

South Brooks Solar Farm

Programme Document

November 2025



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1. Introduction

1.1. Document Purpose

- 1.1.1. Planning Inspectorate (PINS) advice **[Ref. 1]** and government guidance **[Ref. 2]** require the production and submission of a Programme Document for Development Consent Order (DCO) applications which lays out the proposed timetable and activities during pre-application. This document fulfils that requirement.
- 1.1.2. South Brooks Solar Farm is currently at the start of the pre-application process.
- 1.1.3. Following the Inception Meeting with PINS, Blue Planet Solar Limited¹ (the Applicant) will host and maintain a Programme Document on its website and update it as necessary during the pre-application period.

1.2. Summary of South Brooks Solar Farm

- 1.2.1. South Brooks Solar Farm is a proposed new solar farm with associated battery storage and infrastructure that would help meet the country's need for low-carbon, homegrown energy. It includes approximately 1,094 hectares of land that is primarily located within Kent (the 'Site') and would connect into the National Grid at Dungeness substation. The Applicant has a grid connection agreement which would allow the import and export of up to 500MW of electricity to and from the National Grid via Dungeness Substation.

1.3. Document Contents

- 1.3.1. This document details the following information:
 - Timetable of the pre-application process including the planned submission date;
 - Initial areas of interest for examination and how these will be considered and managed;
 - The plan for engaging stakeholders and details of financial support in place; and
 - Cross reference to the Statement of Community Consultation (SoCC).

¹ South Brooks Solar Farm is a joint venture between EDF power solutions and PS Renewables. The directors of Blue Planet Solar Limited are senior members of EDF power solutions and PS Renewables. Blue Planet is the original working name for the project.

2. Pre-Application Timetable

2.1. Overview

- 2.1.1. South Brooks Solar Farm is at an early stage of development. An initial programme has been developed to achieve the key activities required prior to the submission of the DCO. This chapter summarises the activities that have taken place to date and forecasts those activities remaining to achieve successful submission of the DCO application.

2.2. Planning Submission Date

- 2.2.1. It is our intention to submit the DCO application on in **Q1 2027**.

2.3. Timetable of Activities

- 2.3.1. South Brooks Solar Farm publicly launched in **early-September 2025**. This launch comprised the publication of a project website and meetings with key consultees, along with a booklet being sent to properties within the parishes of Lydd, New Romney, Old Romney, Camber and Ivychurch. Prior to launch, meetings were held with the Local Planning Authorities (LPA's) including Kent County Council, East Sussex County Council, Folkestone and Hythe District Council and Rother District Council, and relevant stakeholders, including Natural England and the Royal Society for the Protection of Birds (RSPB), noting the presence of RSPB Dungeness and environmental designations relevant to the Site and surrounding area.
- 2.3.2. An initial phase of non-statutory consultation ('Phase One Consultation') ran between **18 September – 30 October 2025**. This included publishing consultation materials which described the early plans and proposals for South Brooks, holding 5 public events in the local area, publicising the consultation through digital and online advertising as well as ongoing meetings with key consultees.
- 2.3.3. Table 1 summarises the key milestone dates for the South Brooks project. Those highlighted in green are activities that have now taken place and are complete. The remaining dates are approximate quarter forecasts based on the Applicant's current understanding of the South Brooks project and required remaining work.

Table 1: South Brooks Solar Farm Key Pre-Application Activity Dates

Milestone Description	Actual/Forecast Dates
Initial Engagement (LPAs/RSPB)	September 2024 – September 2025
Project Launch	9 September 2025
Non-Statutory Consultation ('Phase One Consultation')	18 September 2025 – 30 October 2025
Inception meeting with PINS	8 October 2025

Environmental Impact Report (EIA) Scoping Report submission	Q4 2025
Receipt of Scoping Opinion	Q1 2026
Consultation on draft Statement of Community Consultation	Q1 2026
Publication of Statement of Community Consultation	Q2 2026
Statutory Consultation ('Phase Two Consultation')	Q2-Q3 2026
Post section 42 consultation meeting with PINS	Q3 2026
Adequacy of Consultation Milestone	Q1 2027
Pre-submission meeting with PINS	Q1 2027
DCO Submission	Q1 2027

2.4. Other new documents required

- 2.4.1. The Applicant is also required to prepare an Issues Tracker in line with the updated PINS guidance.
- 2.4.2. The Issues Tracker has been prepared, and it is the aim to issue this to the Local Planning Authorities and other relevant stakeholders, and PINS during the Non-Statutory Consultation period. Issues have been tracked throughout the pre-application stage and will continue to be tracked, and similar issues have been presented in Section 5 of this document.
- 2.4.3. A Potential Main Issues for the Examination (PMIE) document will also be prepared. This culminates from the Issues Tracker, and should be a short document which, where possible, is agreed by relevant statutory bodies and local authorities. It is the aim to agree the PMIE with as many stakeholders as possible before submission, and it is the aim to issue this document in Q1 2027 to discuss and agree this, where possible, ahead of submission.
- 2.4.4. The Applicant also intends to submit a Design Approach Document (DAD) and a Policy Compliance Document with the DCO application.

2.5. Other consents potentially required

- 2.5.1. Additional consents, licenses and permits may be required as part of the Proposed Development, and are anticipated to include:
 - In terms of hydrology and drainage, a water discharge permit and flood risk activity permit may be required and will be subject to agreement with the Environment Agency.

- Other water resource consents may be required and will be reviewed as the design of the Proposed Development progresses.
- Protected species licenses for bats, Great Crested Newt, badger and other species are likely to be required, subject to agreement with Natural England.
- Because the Proposed Development is partially located within SSSI, SSSI consent will be required.
- Discussions will take place with the Lead Local Flood Authority to determine if land drainage consents are required.
- Highways consents may also be required for any new or altered accesses which may be required.

2.5.2. Where possible, the DCO will seek to disapply any overlapping consents which are identified as the Proposed Development progresses and a schedule of other consents and licences likely to be required will be provided with the DCO application.

3. Areas of Interest for Examination

3.1. Overview

- 3.1.1. The Applicant has assembled an experienced team of technical consultants and is currently undertaking a suite of technical feasibility studies and environmental baseline surveys, in order to inform both the design process and the identification and assessment of the likely environmental effects of South Brooks Solar Farm.
- 3.1.2. The Applicant will, through the submission of an EIA Scoping Request in Q4 2025, be seeking to confirm the scope of the Environmental Statement (ES) and ensure that all necessary environmental baseline surveys have been commissioned. As detailed above, the Applicant has already established contact with a number of prescribed consultees and will be engaging with other parties as necessary to agree the scope of those environmental baseline surveys.
- 3.1.3. Table 2 below identifies the Applicant's view on the main environmental topics that require further discussion with stakeholders and associated next steps.

Table 2: Areas of interest and summary of their status and proposed next steps

Area of interest	Status	Planned work and next steps
Designations	<p>The Site is within and adjacent to the following European designated sites:</p> <ul style="list-style-type: none"> – The Dungeness, Romney Marsh and Rye Bay Ramsar; – The Dungeness, Romney Marsh and Rye Bay Special Protection Area (SPA); – Dungeness Special Area of Conservation (SAC); and – Dungeness National Nature Reserve (NNR). <ul style="list-style-type: none"> • The initial design of South Brooks excludes solar panels, substation or battery storage from being located on land which is nationally or internationally 	<ul style="list-style-type: none"> • Continued engagement with prescribed consultees (e.g. Local Planning Authorities) and non-prescribed consultees (e.g. local Wildlife Trust, RSPB). • Continued engagement with Natural England through the Discretionary Advice Service (DAS). • Consideration of feedback received during Phase One Consultation to inform design. • Ongoing ecological surveys and assessment to inform design. • Interdisciplinary approach to understanding the preferred routing for grid connection corridor.

Area of interest	Status	Planned work and next steps
	<p>designated for ecology. The proposed grid connection corridor between the Site and Dungeness Substation would likely cross the designations.</p> <ul style="list-style-type: none"> Initial engagement with a range of prescribed consultees (e.g. host local authorities) and non-prescribed consultees (e.g. RSPB). Engagement with Natural England through the Discretionary Advice Service (DAS). Ecological surveys ongoing. 	
Ecology	<ul style="list-style-type: none"> Potential for species using the Site to have a functional link to the SSSI and European sites. Initial engagement with a range of prescribed consultees (e.g. host local authorities) and non-prescribed consultees (e.g. RSPB). Engagement with Natural England through the Discretionary Advice Service (DAS). Ecological surveys ongoing. 	<ul style="list-style-type: none"> Continued engagement with prescribed consultees (e.g. Local Planning Authorities) and non-prescribed consultees (e.g. local Wildlife Trust, RSPB) (in progress and continuing). Continued engagement with Natural England through the Discretionary Advice Service (DAS). Consideration of feedback received during Phase One Consultation to inform design. Ongoing ecological surveys and assessment to inform design.

Area of interest	Status	Planned work and next steps
Water resources	<ul style="list-style-type: none"> The Site is partially located within Flood Zones 2 and 3. Engagement with Environment Agency through the Discretionary Advice Service (DAS). 	<ul style="list-style-type: none"> Continued engagement with Environment Agency through the enhanced pre-application service. Engagement with Kent County Council (as main Lead Local Flood Authority) and relevant Internal Drainage Boards. Consideration of feedback received during Phase One Consultation to inform design. Ongoing assessment of water resources, inc. analysis of flood data and modelling to inform design.
Landscape and visual	<ul style="list-style-type: none"> Potential for effects upon local landscape character and visual amenity, noting the Site is not covered by any statutory or local landscape designations. The initial design of South Brooks includes initial offsets from properties and public rights of way. Publication of design principles at Phase One Consultation to guide the design of South Brooks throughout the pre-application period. 	<ul style="list-style-type: none"> Ongoing surveys and assessment to inform design. Continued engagement with prescribed consultees (e.g. Local Planning Authorities) and non-prescribed consultees (e.g. near neighbours to the Site). Consideration of feedback received during Phase One Consultation to inform design.
Agricultural Land Classification (ALC)	<ul style="list-style-type: none"> The Site is partially located within areas which are provisionally mapped as Best and Most Versatile (BMV) soil. 	<ul style="list-style-type: none"> Agricultural Land Classification survey scheduled and assessment ongoing to inform design. Continued engagement with host local authorities.

Area of interest	Status	Planned work and next steps
		<ul style="list-style-type: none"> Continued engagement with Natural England through the Discretionary Advice Service (DAS). Consideration of feedback received during Phase One Consultation to inform design.
Cumulative effects	<ul style="list-style-type: none"> Two other DCO-scale solar farms are also proposed in the local area – South Kent Energy Park and Shepway Energy Park. Engagement with other projects in the local area to understand potential project interrelationships. 	<ul style="list-style-type: none"> Continued engagement with host local authorities. Continued engagement with other projects in the local area to understand potential project interrelationships. Consideration of feedback received during Phase One Consultation. Adherence to Planning Inspectorate Advice Note 17: Cumulative Effects Assessment.
Glint and glare	<ul style="list-style-type: none"> Part of the Site is located near to Lydd Airport. Preliminary glint and glare assessment undertaken. Engagement with Lydd Airport ongoing. 	<ul style="list-style-type: none"> Continued engagement with Lydd Airport and additional stakeholders if required. Detailed assessment of glint and glare ongoing to inform design. Consideration of feedback received during Phase One Consultation to inform design.
Cultural heritage	<ul style="list-style-type: none"> Within 1km of the Site there are some heritage receptors including two scheduled monuments, as 	<ul style="list-style-type: none"> Continued engagement with prescribed consultees (e.g. Local Planning Authorities) and non-

Area of interest	Status	Planned work and next steps
	well as a number of listed buildings.	<p>prescribed consultees (e.g. RSPB who manage the land around the Sound Mirrors).</p> <ul style="list-style-type: none"> Continued engagement with Historic England through the Discretionary Advice Service (DAS). Detailed assessment of cultural heritage ongoing to inform design. Consideration of feedback received during Phase One Consultation to inform design.
Buried heritage	<ul style="list-style-type: none"> Potential for significant effects to buried heritage assets within and in close proximity to the Site. Early desk-based assessment undertaken. 	<ul style="list-style-type: none"> Geophysical survey and walkover site visits scheduled and assessment ongoing to inform design. Agreement of further survey work (e.g. trial trenching). Continued engagement with host local authorities. Continued engagement with Historic England through the Discretionary Advice Service (DAS). Consideration of feedback received during Phase One Consultation to inform design.

4. Approach to Stakeholder Engagement

4.1. Overview

- 4.1.1. The Applicant is engaging widely with stakeholders and members of the communities in the vicinity of the Proposed Development. Audiences for engagement include:
- Statutory Consultees
 - Host and neighbouring local authorities;
 - Prescribed Consultees;
 - Relevant Statutory Undertakers; and
 - Persons with an interest in the land.
 - The Community
 - Walking Groups;
 - Horse Riding Groups;
 - Cycling Groups;
 - Environmental Groups;
 - Local Residents;
 - Local Businesses;
 - Elected Representatives; and
 - Community Groups.
- 4.1.2. Each of these will have different interests in the Proposed Development and wish to engage differently. In this section the Applicant has set out how it will engage with these different groups.
- 4.1.3. An Issues Tracker document will also be produced to consolidate the relevant areas of disagreement during the pre-application phase to inform the PMIE. The PMIE will be produced and submitted with the DCO application.
- 4.1.4. Table 3 below outlines the summary of key stakeholders, the rationale for engagement and proposed methods of engagement.

Table 3: Approach to Stakeholder Engagement

Audience	Methods of Engagement
Planning Inspectorate	<ul style="list-style-type: none">– Direct Engagement– Written Briefings
Prescribed consultees (Technical)	<ul style="list-style-type: none">– Direct Engagement through relevant technical lead(s)

	<ul style="list-style-type: none"> – Written Briefings – Invitation to in-person consultation events – Preparation of Statements of Common Ground (SoCG) (where required) – Project Website
Prescribed consultees (Community and non-governmental organisations)	<ul style="list-style-type: none"> – Direct Engagement – Written Briefings – Invitation to in-person consultation events – Project Website
Host local authorities	<ul style="list-style-type: none"> – Direct Engagement and ongoing liaison with relevant technical leads – Written Briefings – Invitation to in-person consultation events – Project Website – Preparation of SoCG
Neighbouring authorities	<ul style="list-style-type: none"> – Written Briefings – Invitation to in-person consultation events – Project Website
Community	<ul style="list-style-type: none"> – Direct engagement – Newsletter – Invitation to in-person consultation events – Project Website
Landowners	<ul style="list-style-type: none"> – Invitation to in-person consultation events – Project Website – Direct Engagement

4.1.5. The Applicant is aware that the government is reviewing the statutory requirements for how consultation is carried out as part of its Planning and

Infrastructure Bill. The Applicant will carry out future consultation in line with any relevant legislation and guidance in place at that time (early summer 2026). Feedback from Phase One Consultation will also inform the proposed approach.

- 4.1.6. Currently, the Applicant is expecting to conduct a statutory consultation in line with the existing formal requirements and will begin consulting with LPAs on the draft Statement of Community Consultation in Q1 2026. The Applicant will provide an update should this change.
- 4.1.7. A link to the SoCG will be provided once the Applicant has consulted on the SoCG with Folkestone and Hythe District Council, Rother District Council, East Sussex County Council and Kent County Council – the host local authorities. Consultation with surrounding local authorities will also be undertaken if required.

4.2. Financial Support to Stakeholders

- 4.2.1. The Applicant values the inputs of all stakeholders and recognises that many organisations, especially host local authorities, have stretched resources. To support their engagement in the process the Applicant is negotiating a Planning Performance Agreement with the four host local authorities.
 - 4.2.2. In addition, the Applicant will meet the costs of statutory bodies (e.g. the Environment Agency), as appropriate and in accordance with statutory requirements. The Applicant is in the process of setting up Advice Service agreements with Natural England, Environment Agency and Historic England.
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5. Minimising Programme Risks

- 5.1.1. The project manager for the Applicant monitors risks on an ongoing basis, allowing for the early detection and resolution of obstacles that could impede progress. This person is responsible for monitoring and managing all aspects of the risk management process. This includes the following:
- The development and regular review of a risk register;
 - Ensuring there are adequate resources for managing risks;
 - The continual monitoring of the South Brooks project to identify any new or changed risks; and
 - Regular reporting on the status of risks to internal senior management.
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6. References

Ref. 1 – Planning Inspectorate, Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus, 16 May 2024 (last updated 22 October 2025), Source:

<https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-2024-pre-application-prospectus>

Ref. 2 – Ministry of Housing, Communities and Local Government and Department for Levelling Up, Housing and Communities, Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects, 30 April 2024, Source: <https://www.gov.uk/guidance/planning-act-2008-pre-application-stage-for-nationally-significant-infrastructure-projects>



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