South Brooks Solar Farm

Preliminary Environmental Information

Volume 2: Environmental Summary

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Blue Planet Solar Limited

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1 Environmental Summary

1.1 Purpose of this Volume

1.1.1 This Environmental Summary sets out the environmental design evolution and preliminary environmental assessment that has occurred since Phase One consultation and submission of the Environmental Impact Assessment (EIA) Scoping Report for South Brooks Solar Farm (the 'Project').

1.1.2 Following the introduction of the Planning and Infrastructure Act 2025, a requirement to complete statutory consultation and the provision of Preliminary Environmental Information (PEI) has been removed as part of the Act. Changes to the Act do not take effect until further secondary legislation is published. The Applicant recognises the value of pre-application consultation and engagement with local authorities, technical and environmental bodies and the local community and is committed to meaningful engagement with these groups prior to the submission of the Development Consent Order (DCO) application.

1.1.3 The Applicant (see Section 1.2 in **Volume 1: Project and Design Summary)** has adopted an approach to provide detailed non-technical information at this stage of the Project, so that local communities and other stakeholders can readily understand the work undertaken to date, potential environmental effects, and next steps. This approach aligns directly with PINS Guidance Note 7[1], supporting effective and inclusive engagement throughout the pre-application stage by presenting information in a manner that is easy to follow and accessible to both specialist and non-specialist audiences.

1.1.4 In addition to the above, engagement with statutory bodies, including the Environment Agency, Natural England, as well as Kent County Council and East Sussex County Council as the Local Planning Authorities (LPAs), has commenced and will continue throughout the development of the Project and beyond the Phase Two Consultation which includes this Environmental Summary. This ongoing engagement is intended to ensure that statutory bodies remain well informed of the Project's progress and that, where possible, key environmental outputs (such as survey results) are discussed collaboratively with the relevant stakeholders and appropriately reflected in the design evolution. Details of this continued engagement will be set out within the Environmental Statement (ES) which will be submitted as part of the DCO application.

[1] Planning Inspectorate (2025), Nationally Significant Infrastructure Projects - Advice Note Seven: Environmental Impact Assessment: process, preliminary environmental information and environmental statements [Online] Available at: https://www.gov.uk/government/publications/nationally-significant-infrastructure-projects-advice-note-seven-environmental-impact-assessment-process-preliminary-environmental-information-an

1.1.5 The design details that have been provided as part of this Environmental Summary represent the current phase of ongoing project design which has developed since Phase One Consultation, which was completed in October 2025. The Environmental Statement will set out information about how the design that is submitted for consent as part of the DCO application has developed following the Phase Two Consultation.

1.1.6 Volume 1 is a separate document, submitted as part of the Phase Two Consultation, and should be read in conjunction with this document. Volume 1:

- Provides further detail on the key components that define the Project at this stage of design development;
- Explains the need for solar farms such as the Project and how the Site (which is defined as the land where the Project is situated) was identified as an appropriate location to meet that need;
- Presents the indicative development timeline, outlining anticipated programme milestones;
- Summarises updated elements of the design that will be consulted on, ensuring stakeholders understand how feedback and new information have informed refinements to date; and
- Sets out the key next steps for the Project as it progresses towards submission of the DCO application.

1.1.7 The purpose of the Environmental Summary is to:

- Summarise the environmental constraints and opportunities across the Site, and detail how environmental measures have informed the design of the Project to date;
- Detail the Environmental Impact Assessment (EIA) process and how it relates to the Project;
- Provide sections for each technical environmental topic (such as biodiversity, hydrology and agricultural soils) which focus on the preliminary work undertaken to date to understand the likely significant environmental effects of the Project, at this point in time, during its construction, operation (including maintenance and replacement of infrastructure) and decommissioning phases;
- Provide an overview of cumulative developments identified at this stage of the Project; and

- Provide an overview of the Habitats Regulations Assessment (HRA) process which is ongoing alongside the EIA aspects of the Project.

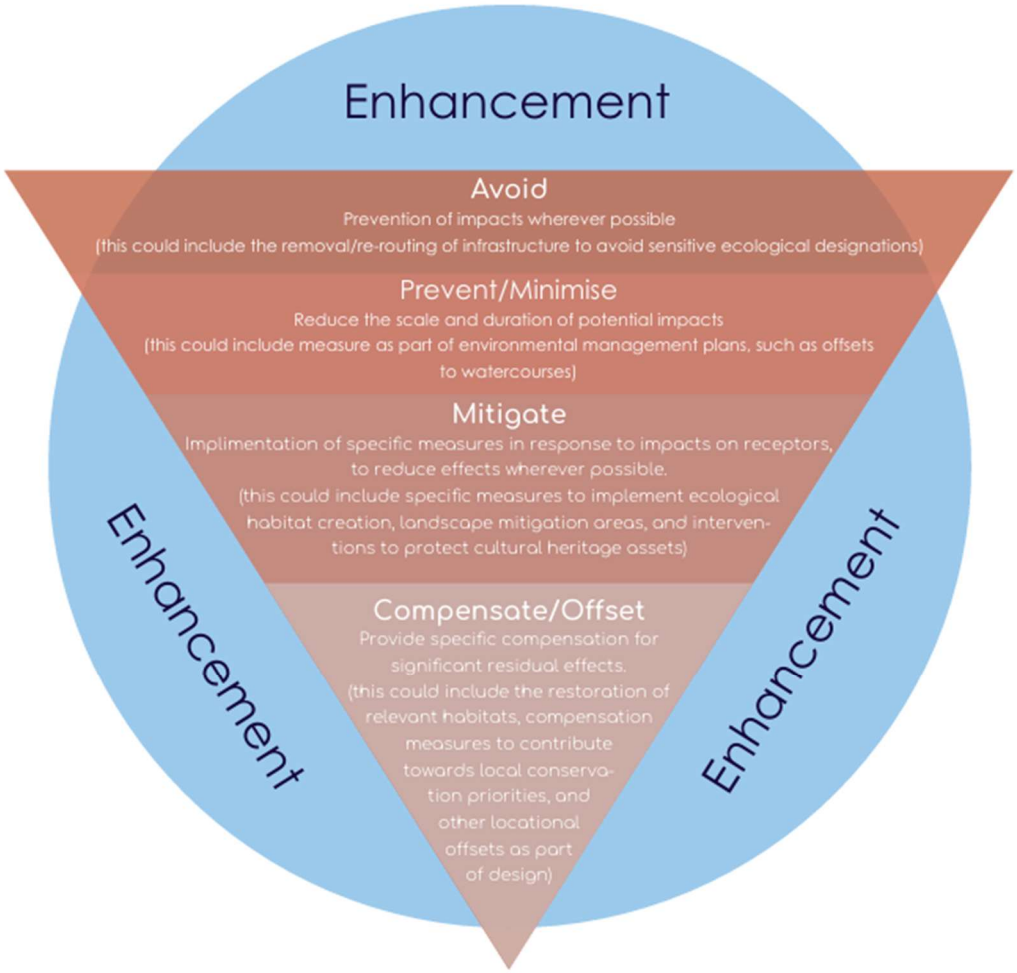
1.1.8 The Environmental Summary is also supplemented by additional appendices where relevant, to provide further detail on key environmental constraints and opportunities. Where possible, draft versions of outline management plans have also been provided. These management plans are the early basis (outline details) to which certain environmental mitigation measures will be delivered and secured. Information received from Phase Two Consultation and further environmental surveys and studies will inform and develop these outline management plans, before they are submitted as part of the DCO application.

2 Environmental Constraints and Opportunities

2.1 How Environmental Measures Inform the Design

2.1.1 The design evolution of the Project is underpinned by the EIA mitigation hierarchy, which is recognised in good-practice guidance from the Institute of Sustainability and Environmental Professionals (ISEP) and the Planning Inspectorate (PINS). The approach aligns with the requirements of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 to identify measures to avoid, prevent, reduce or, if possible, offset any identified significant adverse environmental effects.

2.1.2 The EIA mitigation hierarchy provides a sequential framework for identifying and addressing potential environmental effects, as presented below:

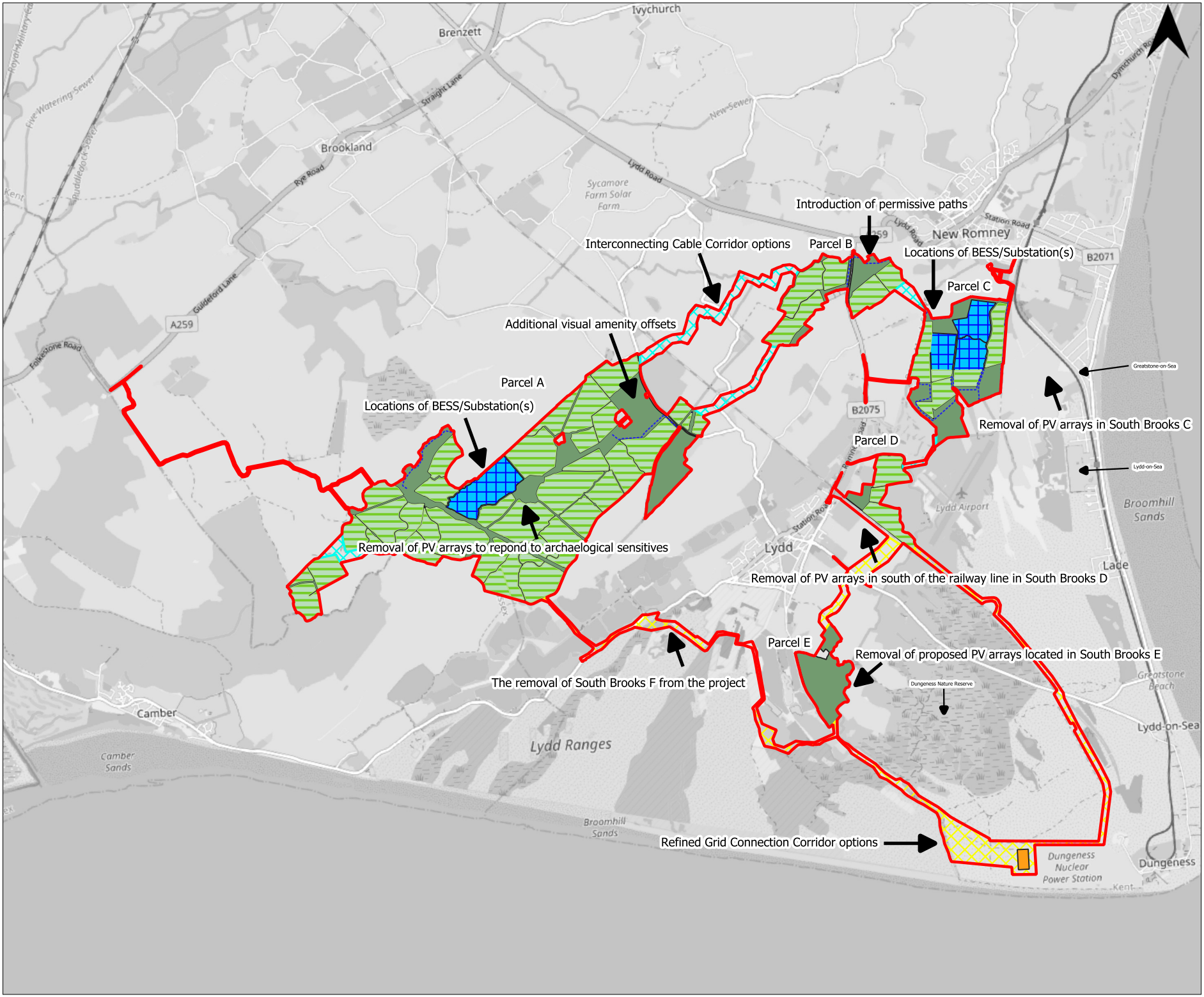


2.1.3 Good practice guidance emphasises integrating the mitigation hierarchy from the earliest stages of project design, ensuring that opportunities to avoid or reduce impacts are identified before any reliance is placed on later-stage mitigation or offsetting measures. Embedding environmental considerations early supports a genuinely iterative design process, enabling environmental constraints and opportunities to shape the evolving layout, refine parameters, and minimise potential effects at source. This iterative approach ensures that mitigation is proportionate and that any residual effects are fully understood and transparently presented. The final details of the mitigation hierarchy will be presented within the Environmental Statement (ES) submitted as part of the DCO application.

2.2 How the EIA Mitigation Hierarchy has been Used in the Project

2.2.1 The design of the Project at this stage has been informed by a combination of site-specific survey data, review of publicly available environmental information, preliminary assessments, and ongoing discussions with key stakeholders. Feedback gathered through the Phase One Consultation has also helped shape the emerging design. Together, this information has enabled the Project to be developed sensitively within its environmental context, avoiding or reducing potential impacts where possible, identifying appropriate mitigation measures, and highlighting opportunities for early environmental enhancements.

2.2.2 **Figure 2-1: Summary of Environmental-led Design Changes** below summarises the environmental led design changes which have been made since the Phase One Consultation and EIA scoping, with the focus on avoidance and prevention of environmental effects.



Drawing number
Figure 2-1

Project/Location
South Brooks Solar Farm

Drawing title
Summary of Environmental-led design changes

Legend

- Site Boundary
- Proposed Mitigation and Enhancement
- Proposed PV Panels and Associated Infrastructure
- Potential BESS Substation PV Panels
- Grid Connection Cable Routes
- Interconnecting Cable Routes
- Point of Connection
- Proposed Permissive path

0 0.5 1 km

Drawing Notes: The site boundary is for indicative purposes only and requires confirmation on site.

Solar and associated infrastructure

2.2.3 The extent and positioning of PV arrays and other associated infrastructure have been refined to avoid and prevent environmental effects, and includes interventions such as:

- A commitment at Phase One consultation to remove above ground infrastructure within designated Sites of Special Scientific Interest (SSSI) as part of the design, with further infrastructure being removed in other sensitive ecological areas, including South Brooks E;
- Increased mitigation offsets have been applied in selected areas including South Brooks A and B, to reduce the potential effects on residential setting and local views;
- Reduction of developable areas in locations of known archaeological and heritage sensitivity;
- Adjustment of the Site boundary to remove the potential for PV arrays immediately east of Lydd within South Brooks D;
- The removal of PV arrays and creation of dedicated mitigation land within South Brooks E, to provide habitat for qualifying bird species associated with the Dungeness, Romney Marsh and Rye Bay Special Protection Area (SPA), and to offer ecological mitigation close to the SSSI and RSPB Dungeness, as well as to reduce impacts to residential amenity;
- Removing sections of the Site boundary and developable areas within South Brooks C and D, following consultation with Lydd Airport and understanding of its operational requirements; and
- New and larger offsets as mitigation land to reduce visual impacts on users of Public Rights of Way (PRoW).

Substation(s) and BESS

2.2.4 Indicative locations for the substation(s) and Battery Energy Storage System (BESS) infrastructure have been identified in response to key environmental constraints, including:

- Flood risk, with a sequential approach to the avoidance of Flood Zones 3/3b;
- A 300-metre buffer from residential properties to minimise potential environmental impacts;
- Agricultural Land Classification (ALC) survey results, avoiding areas of Best and Most Versatile (BMV) land;

- Geophysical survey findings, avoiding areas with potential significant archaeological features; and
- Ecological survey data, ensuring sensitive habitats and areas supporting notable species are avoided.

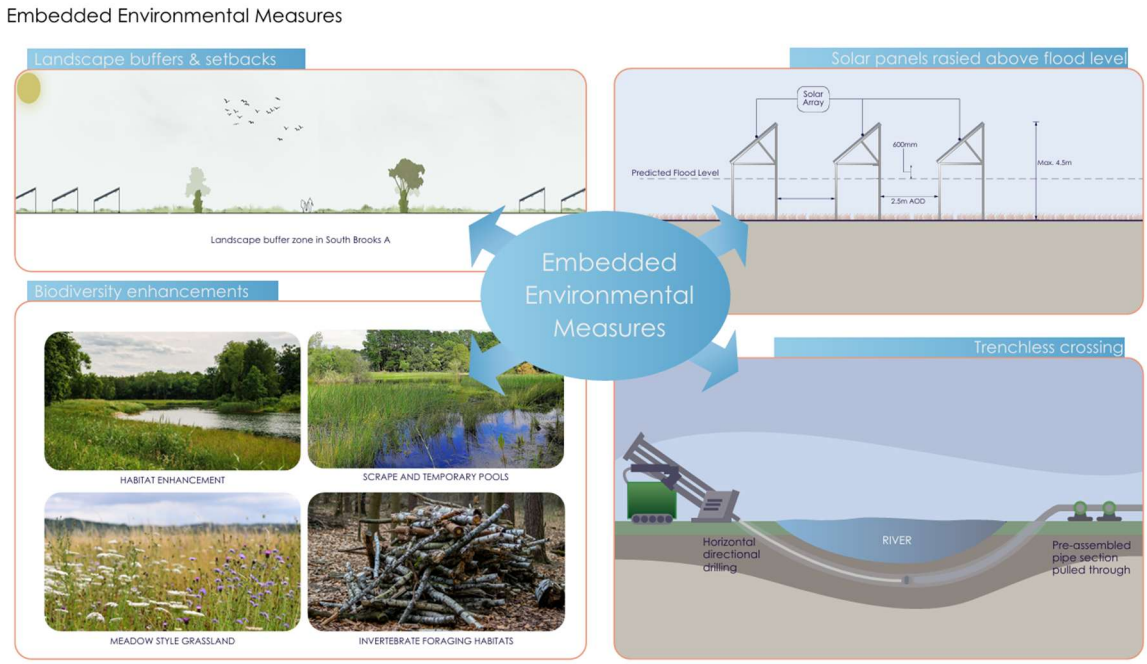
Grid connection and interconnecting cable routes

2.2.5 Options to connect to the Dungeness substation, have been refined to avoid and prevent environmental effects, and includes interventions such as:

- The removal of overhead line (OHL) options to connect to the Dungeness substation due to potential adverse impacts upon environmental receptors including vegetated shingle. which could experience greater impacts in comparison to underground options due to foundation requirements for new OHL pylons. The removal of OHL options also avoids impacts associated with bird strikes and impact to important breeding and habitat locations;
- The avoidance where practicable of OHL options for interconnecting cable corridors to mitigate for visual impacts;
- Providing options for cable corridors within areas of vegetated shingle, so that the route of least impact to designated features is being sought;
- The removal of interconnecting cable route options within SSSI wherever possible;
- Refinements to potential cable routes in response to risks associated with traffic management; and
- Engagement with stakeholders including Natural England, RSPB, EDF Energy, Ministry of Defence (MoD) and Lydd Airport to refine option routes. This includes feedback from Site walkovers and further surveys to understand localised sensitive environmental receptors and how they can be avoided.

2.2.6 In addition to the above, as the Project progresses, further embedded environmental measures will be included within the design and could include the following interventions as visualised in **Figure 2-2: Embedded Environmental Measures**.

Figure 2-1: Embedded Environmental Measures



3 Environmental Impact Assessment Process

3.1 Understanding Environmental Impact Assessment (EIA)

Defining Environmental Impact Assessment

3.1.1 EIA is a process which evaluates the potential for likely environmental effects associated with a project. EIA is inherently a planning process, and forms part of the evidence to which a planning application can be decided upon. In the case of the Project, EIA is a statutory process, which means that the assessment is mandatory as part of the DCO application process as established by the Planning Act 2008[2] and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.

The Purpose of EIA

3.1.2 The main purpose of completing an EIA within the context of the Project is to:

- Identify any likely significant environmental effects associated with the Project, and evidence how these effects can be avoided or mitigated where possible. In effect, EIA is principally concerned with the protection of the environment;
- Set out the evidence for potential environmental enhancements as part of the Project, as well as how these enhancements could be delivered;
- Form part of the evidence-base for improving the overall design of the Project from an environmental perspective;
- Allow all relevant stakeholders as part of the EIA and planning process to analyse the early design and environmental work taking place, through participation in early Project consultation; and
- Inform the decision-making process with regard to the DCO application, providing the Planning Inspectorate and the Secretary of State with comprehensive information on environmental assessments, mitigation and enhancement measures, as well as information on how Project commitments will be adhered to through the lifetime of the Project.

3.2 The EIA Process for South Brooks Solar Farm

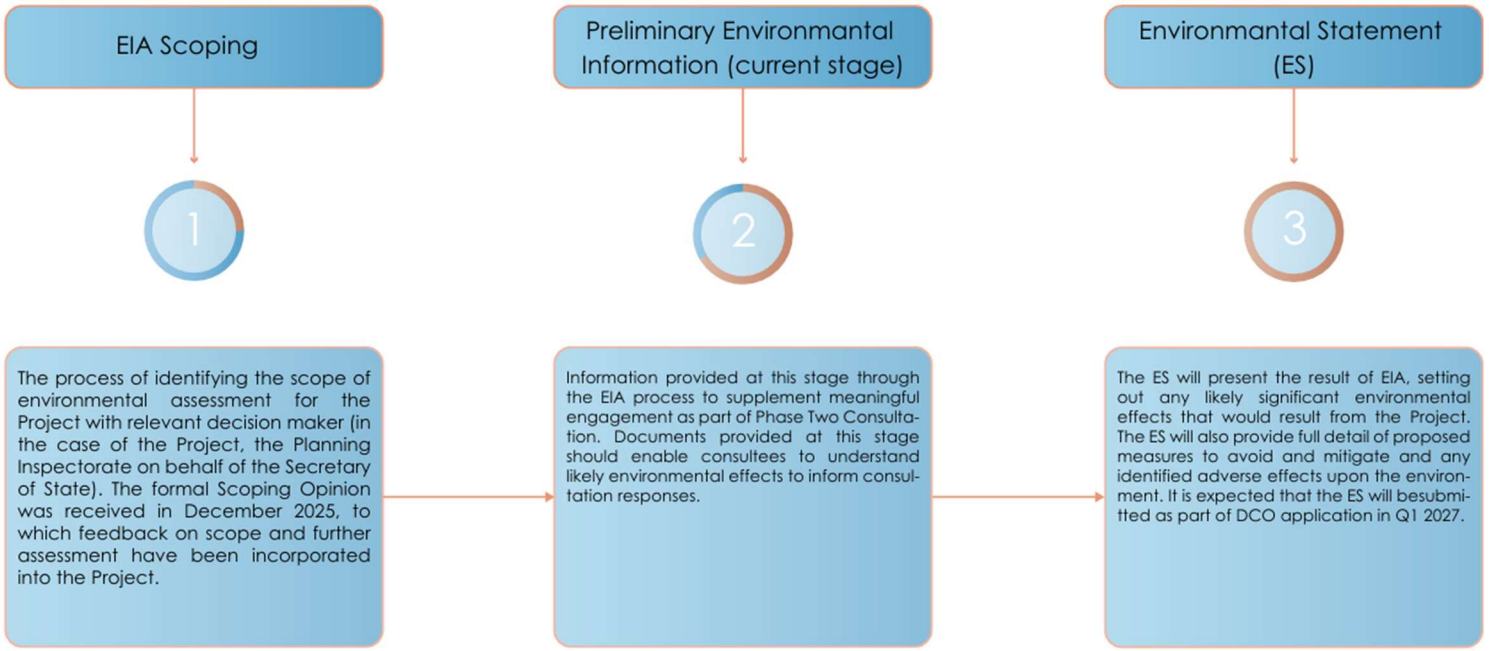
3.2.1 **Figure 3-1: EIA Process** below provides a visual representation of the EIA process specific to the Project. In particular this figure identifies where the Project has

[2] HM Government (2008), Planning Act 2008 [Online] available at: https://www.legislation.gov.uk/ukpga/2008/29/contents

completed environmental work thus far[3], and also what is still to be completed as part of the process.

[3] The EIA Scoping Report, associated appendices and subsequent EIA scoping opinion response, are available to view at: https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN0110027/documents

Figure 3-1: EIA Process



DCO Requirements

3.2.2 Should the Project be granted approval by the Secretary of State, the DCO is made, and this legally approves the Project to proceed.

3.2.3 DCO requirements are set out and form part of the DCO. These requirements are similar to traditional planning conditions and need to be discharged by submitting certain further details or information to the relevant local planning authority for approval before certain development or works can take place. Typical information required to be submitted at the post-consent stage includes detailed design information as well as final, detailed management plans.

Management Plans

3.2.4 Management plans are documents which detail how the Applicant will manage, monitor and deliver mitigation measures that are secured through the DCO. Outline management plans containing outline measures identified in the ES for mitigating environmental effects will be submitted as part of the DCO application. The Draft DCO submitted with the Application will contain requirements to be discharged which ensure that before certain works can commence the Applicant must submit detailed management plans in accordance with the outline management plans with specific measures to deal with specific mitigation to the relevant Local Planning Authority (LPA) for approval. These requirements will also be clear that the Project must be implemented in accordance with the detailed management plans as approved. Non-compliance with the DCO would be a breach of the DCO which constitutes a criminal offence. While not usually prepared until the DCO application, the Applicant received a number of queries during Phase One Consultation on how commitments made by the Project would be implemented and enforced. The Applicant also considers that it will be useful to gain feedback on specific measures within the emerging documents. Details are not final at this stage, and will iteratively be updated as the Project progresses to submission.

3.2.5 Some draft management plans have been compiled at this stage of the Project and have been appended to Volume 2 for Phase Two Consultation. The following documents are available to provide feedback upon, and to support the understanding of how mitigation measures are secured:

- Draft outline Employment, Skills and Supply Chain Management Plan;
- Draft outline Construction Environmental Management Plan;
- Draft outline Landscape and Ecological Management Plan; and
- Draft outline Construction Traffic Management Plan.

4 Potential Environmental Effects

4.1 Introduction

4.1.1 This section of Volume 2 provides an update from each of the relevant environmental disciplines for the Project. These environmental topics reflect the disciplines scoped into the EIA by the EIA Scoping process (as set out in section 3.2 above). Each section details the environmental assessment completed to date, updates upon stakeholder and technical consultation since Phase One Consultation and EIA scoping, design interventions at this stage, and potential significant effects. Further information is also provided on the next steps for environmental assessment, in preparation for the ES submission as part of the DCO application.

4.1.2 Appendices have also been produced to supplement the summary information provided in the sections below. These factsheets provide further technical data regarding ongoing assessments and environmental baselines.

South Brooks
Solar Farm

www.southbrookssolarfarm.co.uk