



Shepway Energy Park: Programme Document

Public Version

Contents

| | |
|---|-----------|
| CONTENTS | 1 |
| 1. INTRODUCTION..... | 2 |
| 1.1. ABOUT SSE RENEWABLES..... | 2 |
| 1.2. ABOUT SHEPWAY ENERGY PARK..... | 2 |
| 1.3. PURPOSE AND STRUCTURE OF THIS DOCUMENT | 3 |
| 2. PRE-APPLICATION TIMETABLE..... | 6 |
| 3. PRE-APPLICATION ISSUES AND POTENTIAL RISKS..... | 8 |
| 3.2. RISK MANAGEMENT | 9 |
| 4. APPROACH TO STAKEHOLDER ENGAGEMENT | 10 |

Tables

| | |
|--|-----------|
| Table 2.1: Key Project Stages and Anticipated Milestone Dates | 6 |
| Table 3.1: Main Issues Identified by the Applicant | 8 |
| Table 3.2: Main Risks Identified by the Applicant..... | 9 |
| Table 4.1: Undertaken/Planned Consultation and Engagement..... | 11 |

1. Introduction

1.1. About SSE Renewables

- 1.1.1. The Applicant for Shepway Energy Park is SSE Newchurch Solar Limited, a wholly owned subsidiary of SSE Renewables Solar & Battery Holdings Limited (SSER-S&B), who specialise in solar and battery storage projects. SSER-S&B was founded in 2021 under the parent organisation SSE Renewables Limited (SSER) and FTSE-100 listed SSE PLC, with an aim to provide solar projects across the UK to accelerate progress towards the UK governments net-zero ambitions.
- 1.1.2. SSER is a leading developer and operator of renewable energy generation including the world's largest offshore wind farm, Dogger Bank. In addition to wind and hydro, SSER is committed to progressing the delivery of a 1.2 GW pipeline of solar and battery projects across the UK and Ireland. The proposed Shepway Energy Park project is part of a further 1.3 GW of prospective sites currently under development and will make a considerable contribution to the UK's energy sector.

1.2. About Shepway Energy Park

- 1.2.1. Shepway Energy Park comprises the installation of solar photovoltaic (PV) modules, associated electrical equipment, battery energy storage facilities, cabling, on-site electrical substation, and associated infrastructure across a proposed site which lies within the Romney Marsh area of Kent, approximately 10km south of Ashford, 15km west of Folkestone and 15km northeast of Rye.
- 1.2.2. The Battery Energy Storage System (BESS) element would have a capacity of circa 400 Megawatts (MW) and the solar PV element would have a capacity of circa 200 MW. The project has an export capacity of circa 400 MW to a new National Grid Electricity Transmission (NGET) owned substation, proposed by NGET, which is expected to be located nearby to the Scheme along the Dungeness to Sellindge overhead line (OHL).
- 1.2.3. Shepway Energy Park is classed in legislation as a Nationally Significant Infrastructure Project (NSIP) and therefore any forthcoming application for a Development Consent Order (DCO) would be submitted to the Planning Inspectorate (PINS).
- 1.2.4. The proposed solar PV modules, battery energy storage facilities, on-site electrical substation, associated electrical equipment and cabling will be placed on six areas

which together form the 'Energy Park Site'. The Energy Park Site is located within Romney Marsh, immediately north of the Village of Newchurch at its closest point.

- 1.2.5. It should be noted that the Scheme has not yet determined specific routes for the interconnecting underground cables between the field parcels.
- 1.2.6. At a county level, the Site is located within the administrative area of Kent County Council. At a local level, the Site lies within the administrative areas of Folkestone & Hythe District Council and Ashford Borough Council. Kent County Council is the upper tier authority, with functions including highways, minerals and waste, and education.
- 1.2.7. The project will discharge electricity without emissions to air, as well as store electricity in the BESS for later discharge, for supply to homes and businesses via the national transmission system.
- 1.2.8. A degree of flexibility has been maintained regarding a number of design matters that are not fixed at this stage in the Development Consent Order (DCO) application. This is to ensure that there is sufficient flexibility to utilise the latest technologies at the time of construction, to enable potential improvements in efficiency and functionality beyond what can be achieved by current technologies.
- 1.2.9. Certain technological design and layout options and other reasonable alternatives have been considered, taking into account the objectives of the Proposed Development, requirements for optimal functionality, and environmental survey findings.

1.3. Purpose and Structure of this Document

- 1.3.1. In May 2024, the Government published its 'Nationally Significant Infrastructure Project: 2024 Pre-application Prospectus', which introduced a new pre-application service for Nationally Significant Infrastructure Projects ('NSIPs') such as the Proposed Development. The new pre-application service is supported by updated guidance published on the Government's 2024 National Infrastructure Planning Guidance Portal.
- 1.3.2. The Pre-application Prospectus introduces three pre-application tier options reflecting different levels of service that applicants may receive from the Planning Inspectorate ('PINS') ahead of submitting an application for a NSIP. These are:
 - Tier 1: Basic;
 - Tier 2: Standard; and
 - Tier 3: Enhanced.

- 1.3.3. At the current time, the Applicant is progressing under the 'Standard' pre-application service.
- 1.3.4. The government has produced guidance 'Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects', which explains the purpose of preparing a Programme Document and also sets out what it should cover.
- 1.3.5. The guidance states (Paragraph 009 Reference ID 02-009-20240430) that the pre-application process for NSIPs is applicant-led and to deliver a good pre-application process, including effective engagement and a well-prepared application, applicants should put together a Programme Document at the outset of the pre-application stage for submission to PINS.
- 1.3.6. The guidance goes on to state that the Programme Document will enable all those engaged in the pre-application process, particularly statutory consultees, to understand the timescales and ensure their contribution is programmed into the pre-application stage at the most effective point. It will also assist the Applicant in managing the preparation and subsequent submission of the application documents for consideration by PINS at the acceptance stage.
- 1.3.7. It is expected that the applicant will host and maintain the agreed Programme Document on its website and update it as necessary during the pre-application stage to publicise completion of significant stages and demonstrate progress in preparation of the application.
- 1.3.8. While the Programme Document is not a statutory requirement or for consultation, the guidance states that it should include (Paragraph 010 Reference ID 02-010-20240430):
- the date the applicant intends to submit their application;
 - a comprehensive timetable of the applicant's pre-application process, the main events with dates and milestones demonstrating how the pre-application process will be completed (using the maximum target of 2 years as a benchmark);
 - the applicant's view on the main issues for resolution and activities they will undertake to address those;
 - the applicant's proposals for engaging with statutory consultees and local authorities during the pre-application period and any intended financial support agreements, such as Planning Performance Agreements (PPAs);
 - the applicant's identification of risks to achievement of the pre-application stage and the process by which these risks are tracked and managed; and
 - cross references to the Statement of Community Consultation ('SoCC') required by section 47 of the PA 2008.

1.3.9. This Programme Document is, therefore, structured as follows:

- Section 2.0 – Pre-Application Timetable.
- Section 3.0 – Pre-Application Issues and Potential Risks; and
- Section 4.0 – Approach to Stakeholder Engagement.

1.3.10. This Programme Document will be published on the Applicant's project website.

1.3.11. The Programme Document will be updated periodically during the pre-application process when pertinent.

2.Pre-Application Timetable

- 2.1.1. This section of the document sets out the indicative pre-application timetable up to submission of the DCO.
- 2.1.2. As set out previously, SSER is under the ‘Standard’ pre-application service tier and has set out the below timetable on that basis. The key project stages and anticipated milestone dates during the pre-application period are set out in Table 2.1 below.

Table 2.1: Key Project Stages and Anticipated Milestone Dates

| Key Project Stage | Date/s of Milestone |
|--|--|
| Meetings with local planning authorities and key stakeholders (Environment Agency, Natural England and Historic England) | November - December 2024 |
| Inception meeting with PINS | 13 December 2024 |
| Project launch including publication of PINS project page (this was when the project entered public domain) | May 2025 |
| Submit EIA Scoping Opinion Request | 29 May 2025 |
| Early (Non-statutory) Consultation | 28 May to 20 July 2025 (including Consultation Events held on 18 and 21 June at Newchurch Village Hall and on 19 June at Dymchurch Village Hall) |
| Receive EIA Scoping Opinion | 10 July 2025 |
| Statutory Consultation ¹ | January to February 2026 |
| PINS Review of Draft Documents | June to August 2026 |
| Submission of DCO Application | October 2026 |

¹ At the time of writing, pre application consultation is a statutory requirement for DCO applications. However, the government has recently stated this is to become non statutory. The Programme Document will be updated if this is enacted in a way that affects the project, and will describe the proportionate and effective consultation that SSER intend to carry out.

2.1.3. Further detail relating to stakeholder engagement and consultation through the pre-application period can be found at Section 4 of this report.

3. Pre-Application Issues and Potential Risks

3.1.1. This section of the document sets out the Applicant's current view of the main issues and risks, and the relevant mitigations and processes for managing risks. The Applicant is still undertaking initial survey, design and engagement work which will inform the identification of main issues and risks, but initial issues and risks are included below.

3.1.2. The main issues that will be identified in the pre-application process are set out in Table 3.1 below.

Table 3.1: Main Issues Identified by the Applicant

| Main Issues | Mitigation Activities |
|------------------------------|--|
| Flood Risk | There is ongoing engagement with the Environment Agency and LPAs to understand the robustness of the current Environment Agency model. Additional flood risk modelling will be undertaken as appropriate and the design of the Scheme will consider this. |
| Landscape and Visual Impact | Engagement with the LPAs and other Statutory Consultees may help to identify the areas of most concern and suitable mitigation measures within the Scheme design. |
| Archaeology | Proportionate field evaluation will be carried out pre application in consultation with Kent County Council where required to understand the potential impacts of the proposals upon the significance of any archaeology, with appropriate mitigation identified thereafter. |
| Public Right of Ways (PRoWs) | Careful design work will be undertaken to reduce impact on PRoWs. |
| Ecology and Biodiversity | A suite of ecology surveys and protected species surveys will be carried out to understand the potential impacts to ecology and biodiversity with appropriate mitigation identified thereafter with Natural England. |
| Transport and Access | Surveys and design work are ongoing, in addition to engagement with the Local Highways Authority (Kent County Council), to |

| Main Issues | Mitigation Activities |
|-------------|---|
| | identify the safest, most accessible routes to the Site, and any necessary mitigation measures. |

3.1.3. Table 3.2 below sets out potential risks identified by the Applicant to achieving the pre-application stage.

Table 3.2: Main Risks Identified by the Applicant

| Risks to Pre-App Stage | Process for Managing Risks |
|---|--|
| Timing of National Grid Electricity Transmission decision on Point of Connection location | The various possibilities are being considered and appropriate consenting strategy developed so that SSER have duly considered the relevant eventualities. SSER are continuing to work closely with National Grid. |
| Consideration of potential cumulative effects | SSER will monitor applications in the local area, engage with LPAs to agree long lists of potential developments ahead of assessments, and engage with other developers where appropriate, following the Planning Inspectorate methodology in the EIA. |
| Lack of stakeholder engagement | A stakeholder engagement strategy has identified the relevant stakeholders, key messages and communication channels to maximise awareness and opportunities to engage. |

3.2. Risk Management

3.2.1. In order to manage risks during the pre-application period, SSER will produce and maintain an Issues Tracker. The issues tracking process will culminate in a list of Potential Main Issues for the Examination which will be entered into the examination as an application document with any outstanding issues at the time of submission.

4. Approach to Stakeholder Engagement

- 4.1.1. This section of the document sets out SSER's approach to stakeholder engagement, including the initial proposals for engagement with statutory consultees during the pre-application stage.
- 4.1.2. The overarching engagement and consultation objective for the project is to build support and address concerns among key stakeholders and local communities. This will be done through:
- Early identification of issues for the local community or other stakeholders, so these can be considered in the developing design of the project.
 - Openly, empathetically and regularly communicating with stakeholders, to establish productive, open and collaborative relationships.
 - Building a project which is responsive to local community concerns and priorities.
 - Creation of a clear understanding of the project and its purpose. Whilst the project covers a large geographical area, it is recognised that there are communities near to the project boundary who may be impacted.
 - Illustrating the benefits of this project.
 - Ensure public understanding of the design and decision-making processes.
 - Reaching seldom heard audiences by using varied communications methods, providing the tools to participate and demonstrate support for the project.
 - Providing stakeholders with the opportunity to submit comments and feedback while the proposals are still at a formative stage, and to provide them with a number of different ways in which to do so.
 - creating multiple listening opportunities to effectively manage concerns and respond to any objections in a manner that complies with the respective DCO processes.
 - Understanding stakeholders, their objectives and requirements (including their status under the Act).
- 4.1.3. The Applicant undertook a Non-Statutory Public Consultation between 28 May 2025 and 20 July 2025, including three Public Exhibitions held in Newchurch and Dymchurch.
- 4.1.4. The Applicant will undertake Statutory Consultation and publish a Statement of Community Consultation ('SoCC'), as required under Section 47 of the Planning Act 2008. Before publishing the SoCC, the Applicant will consult with Ashford

Borough Council, Folkestone and Hythe District Council and Kent County Council for a minimum of 28 days.

4.1.5. The Applicant is also seeking to agree Planning Performance Agreements with all of the relevant Local Planning Authorities, which are currently under negotiation.

4.1.6. Table 4.1 sets out some of the consultation and engagement undertaken to date, and planned consultation and engagement where known:

Table 4.1: Undertaken/Planned Consultation and Engagement

| Date | Description |
|-------------------------|--|
| 28/11/2024 | Meeting with Folkestone and Hythe District Council |
| 29/11/2024 | Meeting with Ashford Borough Council |
| 29/11/2024 | Meeting with Kent County Council |
| 10/12/2024 | Meeting with Historic England |
| 13/12/2024 | Meeting with Planning Inspectorate |
| 18/12/2024 | Meeting with Natural England |
| 19/12/2024 | Meeting with Environment Agency |
| 27/01/2025 | Meeting with Natural England |
| 06/03/2025 | Meeting with Kent Downs National Landscape Unit |
| 26/06/2025 | Meeting with Natural England |
| 29/04/2025 | Meeting with Kent County Council |
| 09/05/2025 | Meeting with Ashford Borough Council |
| 23/05/2025 | Meeting with Folkestone and Hythe District Council |
| 28/05/2025 – 20/07/2025 | Non-Statutory Public Consultation |
| July 2025 | Meeting with Historic England |
| July/August 2025 | Meeting with the Environment Agency |
| July/August 2025 | Environmental Meeting with Kent County Council |

| Date | Description |
|-----------------------------|---|
| July/August 2025 | Environmental Meeting with Ashford Borough Council |
| July/August 2025 | Environmental Meeting with Folkstone and Hythe District Council |
| August 2025 (Indicative) | Post-Scoping, Pre-Section 42 Consultation Meeting with Planning Inspectorate |
| May 2026 (Indicative) | Post-Section 42 Consultation/Post-Preliminary Environmental Information Report Meeting with Planning Inspectorate |
| August 2026 (Indicative) | Draft Documents Feedback Meeting |
| September 2026 (Indicative) | Pre-Submission Meeting with Planning Inspectorate |