Planning Inspectorate
Arolygiaeth Gynllunio

# SCOPING OPINION:

## Proposed Kingsway Solar Farm

**Case Reference: EN010165**

Adopted by the Planning Inspectorate (on behalf of the Secretary of State) pursuant to Regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

**23 January 2025**

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**APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED**

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# 1. INTRODUCTION

1.0.1 On 16 December 2024, the Planning Inspectorate (the Inspectorate) received an application for a scoping opinion from Kingsway Solar Farm Limited (the Applicant) under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) for the proposed Kingsway Solar Farm (the Proposed Development). The applicant notified the Secretary of State (SoS) under Regulation 8(1)(b) of those regulations that they propose to provide an environmental statement (ES) in respect of the proposed development and by virtue of Regulation 6(2)(a), the Proposed Development is 'EIA development'.

1.0.2 The applicant provided the necessary information to inform a request under EIA Regulation 10(3) in the form of a scoping report, available from:

Documents | Kingsway Solar Farm

1.0.3 This document is the Scoping Opinion (the Opinion) adopted by the Inspectorate on behalf of the SoS. This Opinion is made on the basis of the information provided in the Scoping Report, reflecting the Proposed Development as currently described by the applicant. This Opinion should be read in conjunction with the applicant's Scoping Report.

1.0.4 The Inspectorate has set out in the following sections of this Opinion where it has / has not agreed to scope out certain aspects / matters on the basis of the information provided as part of the Scoping Report. The Inspectorate is content that the receipt of this Scoping Opinion should not prevent the applicant from subsequently agreeing with the relevant consultation bodies to scope such aspects / matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects / matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.

1.0.5 Before adopting this Opinion, the Inspectorate has consulted the 'consultation bodies' listed in appendix 1 in accordance with EIA Regulation 10(6). A list of those consultation bodies who replied within the statutory timeframe (along with copies of their comments) is provided in appendix 2. These comments have been taken into account in the preparation of this Opinion.

1.0.6 The Inspectorate has published a series of advice pages, including Advice Note 7: *Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping* (AN7). AN7 and its annexes provide guidance on EIA processes during the pre-application stages and advice to support applicants in the preparation of their ES.

1.0.7 Applicants should have particular regard to the standing advice in AN7, alongside other advice notes on the Planning Act 2008 (PA2008) process, available from:

https://www.gov.uk/government/collections/national-infrastructure-planning-advice-notes

1.0.8 This Opinion should not be construed as implying that the Inspectorate agrees with the information or comments provided by the applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this Opinion are without prejudice to any later decisions taken (e.g. on formal submission of the application) that any development identified by the applicant is necessarily to be treated as part of a Nationally Significant Infrastructure Project (NSIP) or Associated Development or development that does not require development consent.

# 2. OVERARCHING COMMENTS

## 2.1 Description of the Proposed Development

(Scoping Report Section 2)

| ID | Ref | Description | Inspectorate's comments |
|---|---|---|---|
| 2.1.1 | Para 1.1.7 | Site boundary | The Scoping Report states that the site boundary is likely to be refined as the proposed development progresses. The ES should describe any alterations to the final boundary for the Development Consent Order (DCO), including an explanation of the reasons for the changes. The applicant should ensure that the scope of assessments within the ES reflects the maximum extent of the proposed development. |
| 2.1.2 | Section 2.5 | Maximum design parameters | At this stage of development, the number and locations of project elements such as Battery Energy Storage Systems (BESS) and on-site substation(s) have not been determined. The Inspectorate notes the applicant's intention to apply a 'Rochdale Envelope' approach to maintain flexibility within the design of the proposed development. The Inspectorate expects that at the point an application is made, the description of the proposed development will be sufficiently detailed to include the design, size, capacity, technology, and locations of the different elements of the proposed development or where details are not yet known, will set out the assumptions applied to the assessment in relation to these aspects. This should include the footprint and heights of the structures (relevant to existing ground levels), as well as land-use requirements for all elements and phases of the development. The description should be supported (as necessary) by figures, cross-sections, and drawings which should be clearly and appropriately referenced. Where flexibility is sought, the ES should clearly set out and justify the maximum design parameters that would apply for each option assessed and how these have been used to inform an adequate assessment in the ES. The Inspectorate advises that each aspect chapter includes a section that outlines the relevant parameters/ commitments that have informed the assessment. |

| ID | Ref | Description | Inspectorate's comments |
|---|---|---|---|
| 2.1.3 | Para 2.7.1 | Construction compounds | The Scoping Report states that the proposed development would require temporary construction compounds within the site, however, the exact location is yet to be determined. To ensure a robust assessment of likely significant effects, the ES should provide details regarding the number, location and dimensions of construction compounds. |
| 2.1.4 | n/a | Construction workers | No indication is given of the expected total workforce during construction, consequently it is unclear what the impact of the traffic movements associated with the local workforce will be. The ES should quantify the number of construction workers required and explain, with reference to relevant thresholds, whether this is likely to result in significant traffic effects. |
| 2.1.5 | Para 2.7.33 | Access routes and potential highway improvements | The ES should describe the proposed site entrance(s) and the routes to be used for all vehicular access during construction and operation of the proposed development and this information should be clearly presented on supporting plans within the ES. The ES should describe and assess the potential impacts (both positive and negative) associated with any improvements/ changes to the access routes which are either required to facilitate construction of the proposed development or are required for restoration purposes on completion of the works. For the assessment of impacts during construction, the ES should explain how the proposed access route(s) relate to sensitive receptors. |
| 2.1.6 | Para 2.8.1 | New National Grid Substation | The Scoping Report states that the electricity generated by the proposed development is contracted to export to a new National Grid sub-station at Burwell South, the location for which is yet to be determined. The ES should clearly describe the relationship between the proposed development and connected projects. This should include the extent to which the proposed development is dependent on their delivery and the development timelines and anticipated consenting routes of the other projects, with an explanation of how these will be coordinated. Cumulative effects with this project should be fully assessed in the ES. |
| 2.1.7 | Paras 2.9.2 and 2.9.3 | Construction phasing | The Scoping Report states that construction is anticipated to last approximately 24 to 36 months. The ES should include details of how the construction would be phased, including the likely commencement date, duration and location of the required construction activities. |

| ID | Ref | Description | Inspectorate's comments |
|---|---|---|---|
| 2.1.8 | Para 2.9.4 | Construction working hours | The Inspectorate notes that core working hours on-site are anticipated to be between 7am - 7pm Monday to Friday, and 7am - 1pm on Saturday, with construction staff travelling to the site before 7am and departing the site after 7pm on weekdays. The ES should assess the potential for noise exposure arising from construction worker movements to result in likely significant effects at sensitive receptors. The applicant's attention is drawn to the comments of East Cambridgeshire District Council (appendix 2 of this Opinion) noting that the proposed working hours contradict the Council's guidance for noise and noise nuisance. |
| 2.1.9 | Para 2.9.9 | Abnormal Indivisible Loads (AILs) | The Inspectorate notes that there will be a requirement for deliveries of abnormal loads. The applicant's attention is drawn to the comments made by National Highways (appendix 2 of this Opinion) regarding the need to consider AILs in the EIA and consult with the National Highway Abnormal Indivisible Loads Team to discuss any matters pertaining to AIL movements. |
| 2.1.10 | | Agricultural land | The ES should contain a clear tabulation of the areas of land in each Best Most Versatile (BMV) classification to be temporarily or permanently lost as a result of the proposed development, with reference to accompanying map(s) depicting the grades. Specific justification for the use of the land by grade should be provided. Consideration should be given to the use of BMV land in the applicant's discussion of alternatives. |

## 2.2 EIA Methodology and Scope of Assessment

(Scoping Report Section 4)

| ID | Ref | Description | Inspectorate's comments |
|---|---|---|---|
| 2.2.1 | Para 2.7.40 and Table 2.2 | Minimum anticipated offsets / buffers | The Scoping Report refers to 'minimum anticipated offsets / buffers' to mitigate effects to heritage assets, waterbodies and ecological receptors. The ES should confirm the buffers to be employed and demonstrate that they are secured through the site layout and/or relevant management plans to be secured within the DCO. |
| 2.2.2 | n/a | Monitoring | The ES should identify and describe any proposed monitoring of adverse effects and how the results of such monitoring would be utilised to inform any necessary remedial actions. |
| 2.2.3 | n/a | Transboundary | The Inspectorate on behalf of the SoS has considered the proposed development and concludes that the proposed development is unlikely to have a significant effect either alone or cumulatively on the environment in a European Economic Area State. In reaching this conclusion the Inspectorate has identified and considered the proposed development's likely impacts including consideration of potential pathways and the extent, magnitude, probability, duration, frequency and reversibility of the impacts.<br><br>The Inspectorate considers that the likelihood of transboundary effects resulting from the proposed development is so low that it does not warrant the issue of a detailed transboundary screening. However, this position will remain under review and will have regard to any new or materially different information coming to light which may alter that decision. |

| ID | Ref | Description | Inspectorate's comments |
|---|---|---|---|
| | | | Note: The SoS' duty under Regulation 32 of the 2017 EIA Regulations continues throughout the application process.<br><br>The Inspectorate's screening of transboundary issues is based on the relevant considerations specified in the Annex to its Advice Page 'Nationally Significant Infrastructure Projects: Advice on Transboundary Impacts and Process', links for which can be found in paragraph 1.0.7 above. |

# 3. ENVIRONMENTAL ASPECT COMMENTS

## 3.1 Environmental aspects proposed to be scoped out of further assessment

(Scoping Report Section 5)

| ID | Ref | Applicant's proposed aspects to scope out | Inspectorate's comments |
|---|---|---|---|
| 3.1.1 | Section 5.2 and Table 5.1 | Flood Risk (Flood Map for Planning and Surface Water Flooding) | The Inspectorate notes the justification provided by the applicant in order to scope out flood risk from the ES. The Inspectorate considers that the information provided aligns with the requirements of the Nationally Significant Infrastructure Projects: Technical Advice Page for Scoping Solar Development and accompanying Solar Scoping Table.<br><br>On this basis, the Inspectorate is therefore in agreement that flood risk can be scoped out of further assessment. The applicant is also directed to the Environment Agency's consultation response (appendix 2 of this Opinion) which provides information in relation to the requirements of the Flood Risk Assessment (FRA). |
| 3.1.2 | Section 5.2 and Table 5.1 | Water quality | The Inspectorate notes the justification provided by the applicant in order to scope out water quality effects from the ES. The Inspectorate considers that the information provided aligns with the requirements of the Nationally Significant Infrastructure Projects: Technical Advice Page for Scoping Solar Development and accompanying Solar Scoping Table. On this basis, the Inspectorate is therefore in agreement that water quality can be scoped out of further assessment.<br><br>The applicant's attention is drawn to the Environment Agency's consultation response (appendix 2 of this Opinion), which requests that further detail is provided on the proposed mitigation to be employed to protect surface water quality should horizontal directional drilling (HDD) be required during construction. Any mitigation measures should be provided with the application along with the proposed methods by which it will be secured in the DCO. |

| ID | Ref | Applicant's proposed aspects to scope out | Inspectorate's comments |
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| 3.1.3 | Para 4.11.3<br>Section 5.2<br>Table 5.1 | Water Framework Directive (WFD) waterbodies | The Inspectorate is content to scope out WFD waterbodies from further assessment on the basis that a standalone WFD assessment will be carried out to identify potential impacts on the water body status of relevant WFD classified waterbodies. The applicant is directed to the Environment Agency's consultation response (appendix 2 of this Opinion) which provides information in relation to the requirements of the WFD assessment. |
| 3.1.4 | Section 5.2 and<br>Table 5.1 | Water resources | The Inspectorate notes that the site is located within an area designated as 'water stressed' by the Environment Agency. The ES should assess the potential impact of the proposed development on water resources where there is potential for significant effects to occur and include details relating to the water supply and demand requirements during the construction and operational phases of the proposed development (including in the context of managing BESS fire risk). |
| 3.1.5 | Section 5.3 | Glint and glare | The Scoping Report proposes to scope out a glint and glare ES aspect chapter, however a standalone glint and glare assessment is proposed to be submitted as a technical appendix to ES. The Inspectorate is content with this approach, however the standalone glint and glare assessment should assess the worst-case scenario and provide a description of any relevant mitigation measures and safety considerations. In the event that glint and glare effects are identified, it should be used to inform the relevant chapters in the ES, in particular for the Landscape and Visual Impact Assessment (LVIA) chapter. |
| 3.1.6 | Section 5.4 | Heat and radiation | The Scoping Report proposes to scope out an assessment of impacts from heat and radiation during construction, operation and decommissioning as no significant sources of heat and radiation are anticipated due to the scale and nature of the proposed development. The Inspectorate agrees that this matter may be scoped out from further assessment provided that the ES clearly signposts any identified sources of heat and |

| ID | Ref | Applicant's proposed aspects to scope out | Inspectorate's comments |
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| | | | radiation and how this has been considered with respect to site selection, site layout and mitigation design. |
| 3.1.7 | Section 5.5 | Electric, magnetic and electromagnetic fields (EMF) | The Scoping Report proposes to exclude EMF on the basis that a separate EMF report will be included as part of the DCO submission. The Inspectorate is content with this approach. The EMF report should include the location, routing and voltages of any cables over 132kV and a risk assessment to any human and ecological sensitive receptors within the Zone of Influence (ZoI).<br><br>The applicant's attention is drawn to the comments from the Environment Agency (appendix 2 of this Opinion) requesting that potential impacts on fish from EMFs where high voltage cables are crossing under main watercourses be scoped into the EIA. |
| 3.1.8 | Section 5.6 | Major accidents and disasters | The Inspectorate notes the justification provided by the applicant in order to scope out major accidents and disasters from the ES. The Inspectorate considers that the information provided aligns with the requirements of the Nationally Significant Infrastructure Projects: Technical Advice Page for Scoping Solar Development and accompanying Solar Scoping Table.<br><br>The Inspectorate agrees that the probability, likelihood and frequency of a major accident or disaster is very low with respect to the proposed development and is satisfied that they would be managed under established legislative requirements, the design process or mitigation measures and management plans described in Section 2 (such as a Battery Safety Management Plan). As such, the Inspectorate agrees that significant effects relating to major accidents and disaster are unlikely and this matter can be scoped out of the ES.<br><br>The applicant's attention is drawn to the comments of the UK Health and Safety Executive (appendix 2 of this Opinion) regarding the assessment of risk to public health associated with failure of the BESS. |

| ID | Ref | Applicant's proposed aspects to scope out | Inspectorate's comments |
|---|---|---|---|
| 3.1.9 | Section 5.7 | Material assets and waste | The Scoping Report proposes to scope out waste in its entirety. The Inspectorate notes the proposal for the ES "Description of the Scheme" chapter to outline potential streams of construction waste and estimate volumes. The Scoping Report confirms that the ES will outline measures to be implemented to minimise waste and a Site Waste Management Plan (SWMP) is proposed to manage waste. An outline Operational Environmental Management Plan (oOEMP) and outline decommissioning Environmental Management Plan (oDEMP) will be submitted as part of the DCO application, which will set out how waste from replacing components during the operational phase and decommissioning waste will be managed and detail opportunities for re-use and recycling.<br><br>However, the Inspectorate notes that excavations may be required during construction, and that component replacement may be necessary during operation. In the absence of information demonstrating the quantities and types of waste anticipated, and the dependence on mitigation measures which are yet to be provided the Inspectorate does not agree to scope this matter out of further assessment. The ES should include estimates, by type and quantity, of expected residues and emissions and quantities and types of waste produced during the construction and operation phases in line with Schedule 4 of the EIA Regulations. The ES should include an assessment of likely significant effects arising from the transportation and disposal of waste. |
| 3.1.10 | Section 5.8 | Human Health | The Inspectorate agrees that a standalone chapter is not required, provided that effects on human health are considered within other aspect chapters where relevant. The EIA methodology chapter should provide clear cross-referencing to where the relevant direct and indirect impacts on human health receptors are considered in the ES. Where human health impacts have been assessed in the ES, consideration should be given to relevant guidance such as the Institute of Environmental Management and Assessment (IEMA) 2022 guidance 'Determining Significance for Human Health in Environmental Impact Assessment'. |

| ID | Ref | Applicant's proposed aspects to scope out | Inspectorate's comments |
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| | | | The applicant's attention is drawn to the comments from Cambridgeshire Council and South Cambridgeshire District Council (appendix 2 of this Opinion) regarding the assessment of mental health impacts of the proposed development on the local population. |
| 3.1.11 | Section 5.9 | Utilities | The Scoping Report states that existing infrastructure will be identified through a utilities search and consultation, and this information will be used to inform the design of the proposed development to avoid impacts on receptors. The outline Construction Environmental Management Plan (oCEMP) will include mitigation measures to protect against interference with below ground utilities during construction. The Inspectorate is content that a standalone ES Chapter for utilities is not required. However, the ES should explain the findings of the utilities search and signpost to where any required mitigation measures are secured. |
| 3.1.12 | Section 5.10 | Transboundary effects | The applicant's attention is directed to the Inspectorate's comments in ID 2.2.3 above. |

## 3.2 Biodiversity

(Scoping Report Section 6.1)

| ID | Ref | Applicant's proposed matters to scope out | Inspectorate's comments |
|---|---|---|---|
| 3.2.1 | Para 6.1.9 | Eversden and Wimpole SAC – all project areas/ all phases | The Scoping Report states that the Eversden and Wimpole SAC has been designated for western barbastelle bats and is located within 20km of the proposed development. The applicant proposes to scope out this matter on the basis that western barbastelle bats are unlikely to be dependent on the habitats within the site boundary due to the distance between the proposed development and Eversden and Wimpole SAC. However, the Inspectorate notes that western barbastelle can forage up to 20km and there is potential for the proposed development to adversely impact the qualifying features of Eversden and Wimpole SAC.<br><br>In the absence of information such as evidence demonstrating clear agreement with relevant consultation bodies, the Inspectorate is not in a position to agree to scope this matter from further assessment. The ES should provide an assessment of likely significant effects on Eversden and Wimpole SAC, including the potential for the proposed development site to provide functionally linked land for species which are qualifying features or provide the evidence referred to above, demonstrating an absence of likely significant effects. |
| 3.2.2 | Para 6.1.9 | Fenland SAC - Developable Areas A, B, C and Inter Array Connection Corridors (IACCs)/ all phases | The Inspectorate considers that the Scoping Report does not demonstrate that all potential pathways for effects on Fenland SAC have been adequately considered, for example through any hydrological pathways. The ES should provide an assessment of likely significant effects on Fenland SAC or provide the evidence demonstrating agreement with relevant consultation bodies and the absence of likely significant effects. |
| 3.2.3 | Para 6.1.9 | Devil's Dyke SAC – Developable Areas A, B, C and IACCs/ all phases | The Scoping Report proposes to scope out this matter on the basis that the Devil's Dyke SAC is located over 10km from the Developable Areas A, B and C and the IACCs. |

| ID | Ref | Applicant's proposed matters to scope out | Inspectorate's comments |
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| | | | However, 6.1.5 of the Scoping Report indicates that the Devil's Dyke SAC is located within 6.5km of the developable areas and IACCs.<br><br>The Inspectorate does not consider sufficient information has been presented to provide confidence that all potential pathways for effects on Devil's Dyke SAC have been adequately considered, for example through impacts to air quality. The ES should provide an assessment of likely significant effects on Devil's Dyke SAC or provide the evidence demonstrating agreement with relevant consultation bodies and the absence of likely significant effects. |
| 3.2.4 | Para 6.1.9 | Wicken Fen Ramsar – Developable Areas A, B, C and IACCs/ all phases | The Scoping Report proposes to scope out these matters on the basis that the Wicken Fen is located over 10km from the Developable Areas A, B and C and the IACCs and it is unlikely that the proposed development would lead to direct and indirect impacts on the designated sites.<br><br>The Inspectorate agrees that construction, operation and decommissioning of Developable Areas A, B and C and the IACCs is unlikely to result in significant effects on the Wicken Fen Ramsar and is content for this matter to be scoped out of further assessment. |
| 3.2.5 | Para 6.1.9 | Fenland SAC – Grid Connection Corridors (GCCs) / operation | The Inspectorate considers that the Scoping Report does not demonstrate that all potential pathways for effects during operation of the GCCs have been adequately considered, for example through any hydrological pathways. The applicant's attention is drawn to the comments from the Environment Agency (appendix 2 of this Opinion) requesting that Fenland SAC is scoped in for potential impacts from EMFs on qualifying fish species where high voltage cables are crossing under main watercourses.<br><br>The ES should provide an assessment of likely significant effects on Fenland SAC during operation or provide the evidence demonstrating agreement with relevant consultation bodies and the absence of likely significant effects. |

| ID | Ref | Applicant's proposed matters to scope out | Inspectorate's comments |
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| 3.2.6 | Para 6.1.9 | Impacts to the following internationally designated sites (GCCs/ operation):<br>• Wicken Fen Ramsar<br>• Devil's Dyke SAC | The Scoping Report states that due to the distance between the GCCs and the designated sites there would be no direct or indirect impacts during operation and the applicant proposes to scope these matters out of further assessment.<br>The Inspectorate agrees that operation of the GCCs is unlikely to result in significant effects on the Wicken Fen Ramsar and Devil's Dyke SAC and is content for this matter to be scoped out of further assessment. |
| 3.2.7 | Para 6.1.9 | Chippenham Fen Ramsar – GCCs/ all phases | The Scoping Report proposes to scope out this matter on the basis that the Chippenham Fen Ramsar is located 5km from the GCCs and there are no hydrological links to the designated site. On the basis that there are no hydrological links between the GCCs and Chippenham Fen Ramsar, the Inspectorate agrees that construction, operation and decommissioning of the GCC is unlikely to result in significant effects and is content for this matter to be scoped out of further assessment. |
| 3.2.8 | Para 6.1.9 | Impacts to the following nationally designated sites (Developable Areas A, B, C and IACCs/ all phases):<br>• Wicken Fen SSSI<br>• Devil's Dyke SSSI<br>• Newmarket Heath SSSI | The Scoping Report proposes to scope out these matters on the basis that the designated sites are located beyond the 2km study area from the Developable Areas A, B and C and the IACCs and it is unlikely that the proposed development would lead to direct and indirect impacts on the designated sites.<br>The Inspectorate agrees that construction, operation and decommissioning of the Developable Areas A, B and C and the IACCs is unlikely to result in significant effects on the designated sites and is content for this matter to be scoped out of further assessment. |
| 3.2.9 | Para 6.1.9 | Impacts to the following nationally designated sites (GCCs/ operation): | The Scoping Report states that due to the distance between the GCCs and the Devils' Dyke SSSI and Newmarket Heath SSSI there would be no direct or indirect impacts during operation and the applicant proposes to scope these matters out of further assessment. |

| ID | Ref | Applicant's proposed matters to scope out | Inspectorate's comments |
|---|---|---|---|
| | | • Devil's Dyke SSSI<br>• Newmarket Heath SSSI | However, 6.5.1 of the Scoping Report notes that Devils' Dyke SSSI and Newmarket Heath SSSI are partly located within the GCC.<br>The Inspectorate considers that the ES should provide an assessment of likely significant effects from operation of the GCCs on Devils' Dyke SSSI and Newmarket Heath SSSI or provide the evidence demonstrating agreement with relevant consultation bodies and the absence of likely significant effects. |
| 3.2.10 | Para 6.1.9 | Wicken Fen SSSI – GCCs/ operation | The Scoping Report states that due to the distance between the GCCs and the Wicken Fen SSSI there would be no direct or indirect impacts during operation and the applicant proposes to scope these matters out of further assessment. The Inspectorate agrees that operation of the GCCs is unlikely to result in significant effects on the Wicken Fen SSSI and is content for this matter to be scoped out of further assessment. |
| 3.2.11 | Para 6.1.9 | Fleam Dyke SSSI – all project areas/ operation | The Scoping Report proposes to scope out this matter on the basis that there would be no direct or indirect impacts on Fleam Dyke SSSI during operation. However, the Scoping Report states that the Fleam Dyke SSSI is located within the IACCs and GCCs and is located directly adjacent to Developable Area A.<br>The Inspectorate considers that the ES should provide an assessment of likely significant effects from operation of the proposed development on Fleam Dyke SSSI or provide the evidence demonstrating agreement with relevant consultation bodies and the absence of likely significant effects. |
| 3.2.12 | Para 6.1.9 | Roman Road SSSI – Developable Areas A and B/ all phases | The applicant proposes to scope out this matter on the basis that the Roman Road SSSI does not "*appear*" to be hydrologically linked to Developable Areas A and B and standard pollution prevention measures would be implemented to prevent any potential indirect effects. The Inspectorate notes that the Roman Road SSSI is located approximately 270m from the Developable Area A. In the absence of evidence demonstrating clear agreement with relevant consultation bodies, the Inspectorate considers that the ES should provide an assessment of the potential effects on the Roman Road SSSI or provide a justification as |

| ID | Ref | Applicant's proposed matters to scope out | Inspectorate's comments |
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| | | | to the absence of likely significant effects including evidence of agreement with relevant consultation bodies. |
| 3.2.13 | Para 6.1.9 | Roman Road SSSI – Developable Area C, IACCs and GCCs/ all phases | The Scoping Report states that this matter has been scoped out on the basis that the Roman Road SSSI would not be directly or indirectly impacted by Developable Area C, the IACCs or the GCCs. However, no justification for this statement has been provided. The Inspectorate considers that the ES should include an assessment of this matter or provide justification as to the absence of likely significant effects including evidence of agreement with relevant consultation bodies. |
| 3.2.14 | Para 6.1.9 | Balsham Wood SSSI - Developable Areas A, B, C and IACCs/ all phases | The applicant proposes to scope out this matter on the basis that the Balsham Wood SSSI is located over 1km from Developable Areas A, B and C and there would not be any direct or indirect impacts. Limited information has been provided in the Scoping Report to support this justification as the designated sites are located within the established 2km study area.<br><br>The Inspectorate considers that the ES should include an assessment of this matter or provide information demonstrating the absence of likely significant effects including evidence of agreement with relevant consultation bodies. |
| 3.2.15 | Para 6.1.9 | Impacts to the following nationally designated sites (Developable Areas A and B/ all phases):<br>• Fulbourn Fen SSSI<br>• Great Wilbraham Common SSSI<br>• Park Wood SSSI | The Scoping Report proposes to scope out these matters on the basis that the designated sites are located beyond the 2km study area for the Developable Areas A and B and it is unlikely that the proposed development would lead to direct and indirect impacts on the designated sites.<br><br>The Inspectorate agrees that construction, operation and decommissioning of the Developable Areas A and B is unlikely to result in significant effects on the designated sites and is content for this matter to be scoped out of further assessment. |

| ID | Ref | Applicant's proposed matters to scope out | Inspectorate's comments |
|---|---|---|---|
| | | • Carlton Wood SSSI | |
| 3.2.16 | Para 6.1.9 | Impacts to the following nationally designated sites (Developable Area C and IACCs/ all phases):<br>• Fulbourn Fen SSSI<br>• Great Wilbraham Common SSSI | The Scoping Report proposes to scope out these matters on the basis that the designated sites are located beyond the 2km study area for the Developable Area C and the IACCs and it is unlikely that the proposed development would lead to direct and indirect impacts on the designated sites.<br>The Inspectorate agrees that construction, operation and decommissioning of the Developable Areas C and the IACCs is unlikely to result in significant effects on the designated sites and is content for these matters to be scoped out of further assessment. |
| 3.2.17 | Para 6.1.9 | Impacts to the following nationally designated sites (Developable Area C and IACCs/ all phases):<br>• Park Wood SSSI<br>• Carlton Wood SSSI | The Scoping Report proposes to scope out these matters on the basis that the designated sites are located over 1km from Developable Area C and there would not be any direct or indirect impacts. Limited information has been provided in the Scoping Report to support this justification as the designated sites are located within the established 2km study area.<br>The Inspectorate considers that the ES should include an assessment of this matter or provide information demonstrating the absence of likely significant effects including evidence of agreement with relevant consultation bodies. |
| 3.2.18 | Para 6.1.9 | Impacts to the following nationally designated sites (GCCs/ all phases):<br>• Carlton Wood SSSI | The applicant proposes to scope out these matters on the basis that the proposed development would not lead to direct and indirect impacts on the designated sites. The Scoping Report states that the Carlton Wood SSSI and Balsham Wood SSSI are located beyond the 2km study area for the GCCs. On this basis, the Inspectorate agrees that construction, operation and decommissioning of the GCCs is unlikely to result in significant |

| ID | Ref | Applicant's proposed matters to scope out | Inspectorate's comments |
|---|---|---|---|
| | | • Balsham Wood SSSI | effects on the designated sites and is content for these matters to be scoped out of further assessment. |
| 3.2.19 | Para 6.1.9 | Impacts to the following nationally designated sites (GCCs/ all phases):<br>• Fulbourn Fen SSSI<br>• Great Wilbraham Common SSSI<br>• Park Wood SSSI | The Scoping Report proposes to scope out these matters on the basis that the designated sites are located over 1km from the GCCs and there would not be any direct or indirect impacts. Limited information has been provided in the Scoping Report to support this justification as the designated sites are located within the established 2km study area.<br>The Inspectorate considers that the ES should include an assessment of this matter or provide information demonstrating the absence of likely significant effects including evidence of agreement with relevant consultation bodies. |
| 3.2.20 | Para 6.1.9 and Table 6.1.10 | Carlton Lane County Wildlife Site (CWS) and Hills Crofts CWS – all project areas / all project phases | The Scoping Report proposes to scope out impacts on Hills Crofts CWS for all project areas and phases. The Inspectorate notes that Hills Crofts CWS is adjacent to Developable Area C, and that the Scoping Report states that buffers "in excess of 15m" will be recommended around all woodlands to avoid impacts.<br>On the basis that the ES secures appropriate measures to avoid impacts on Hills Crofts CWS in the oCEMP and oOEMP to be secured via the DCO, and demonstrates agreement with the relevant consultees, the Inspectorate agrees that this matter can be scoped out of further assessment.<br>The Inspectorate notes that Carlton Lane CWS is within Developable Area C. No supporting evidence has been provided to justify scoping out effects on this receptor, and on this basis the Inspectorate does not agree to scoping this matter out at this stage. Accordingly, the ES should include an assessment of this matter or information demonstrating agreement with the relevant consultation bodies that significant effects are unlikely.<br>The applicant's attention is drawn to the consultation response from the Forestry Commission (appendix 2 of this Opinion) regarding the potential presence of ancient and |

| ID | Ref | Applicant's proposed matters to scope out | Inspectorate's comments |
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| | | | veteran trees within the Hills Crofts CWS that are as yet unidentified by the Ancient Tree Inventory. |
| 3.2.21 | Para 6.1.9 and Table 6.1.10 | Whitings Grove and Rands Woods CWS – all project areas / all project phases | The Scoping Report concludes that there would be no likely significant effects on these receptors due to the distance from all elements of the proposed development.<br>On the basis that the ES secures appropriate measures in the oCEMP and oOEMP to avoid impacts on Whitings Grove and Rands Woods CWS and demonstrates agreement with the relevant consultees, the Inspectorate agrees that this matter can be scoped out of further assessment. |
| 3.2.22 | Para 6.1.9 and Table 6.1.10 | Old Cambridge Road Verges CWS – Developable Areas A and B (operation), Developable Area C and Inter Array Connection Corridors (all project phases) and GCCs (operation) | The Scoping Report proposes to scope out impacts on Old Cambridge Road CWS for Developable Areas A and B and the GCCs during operation on the basis that operation of the proposed development is not anticipated to involve any impacts to the CWS as it is along an existing track which will have similar levels of use during operation, and measures to protect the site (including buffer zones) will be included in the oOEMP.<br>The Scoping Report proposes to scope out impacts on Old Cambridge Road CWS for Developable Area C and the IACCs for all project phases on the basis that these elements of the proposed development are located approximately 90m from the CWS.<br>On the basis that the ES secures appropriate measures in the oCEMP and oOEMP to avoid impacts on Old Cambridge Road CWS and demonstrates agreement with the relevant consultees, the Inspectorate agrees that this matter can be scoped out of further assessment. |
| 3.2.23 | Para 6.1.9 and Table 6.1.10 | Great Covens Wood and Lower Wood (CWS) - Developable Areas A, B and C, Inter Array Connection Corridors (IACCs) and Grid | The Scoping Report concludes that there would be no likely significant effects on this receptor due to the distance from all elements of the proposed development.<br>On the basis that the ES secures appropriate measures in the oCEMP and oOEMP to avoid impacts on Great Covens Wood and Lower Wood CWS and demonstrates agreement with the relevant consultees, the Inspectorate agrees that this matter can be scoped out of further assessment. |

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| | | Connection Corridors (GCCs) – all project phases | |
| 3.2.24 | Para 6.1.9 and Table 6.1.10 | Brinkley Hall Veteran Trees CWS and Ladies Grove and Hay Wood CWS – all project areas / all project phases | The Scoping Report concludes that there would be no likely significant effects on these receptors due to the distance from all elements of the proposed development.<br>On the basis that the ES secures appropriate measures in the oCEMP and oOEMP to avoid impacts on Brinkley Hall Veteran Trees CWS and Ladies Grove and Hay Wood CWS and demonstrates agreement with the relevant consultees, the Inspectorate agrees that this matter can be scoped out of further assessment. |
| 3.2.25 | Para 6.1.9 and Table 6.1.10 | Brinkley Wood CWS and West Wratting Valley Farm RSV CWS – Developable Areas A, B and C and IACC's (all project phases) and GCCs (operation) | The Scoping Report proposes to scope out impacts on these receptors due to the distance from all elements of the proposed development.<br>On the basis that the ES secures appropriate measures in the oCEMP and oOEMP to avoid impacts on these receptors and demonstrates agreement with the relevant consultees, the Inspectorate agrees that this matter can be scoped out of further assessment. |
| 3.2.26 | Para 6.1.9 and Table 6.1.10 | Burwell Disused Railway CWS, Swaffham Bulbeck Protected Road Verge and Heath Road / Steet Way Green Lanes CWS - Developable Areas A, B and C and IACC's (all project phases) and GCCs (operation) | The Scoping Report proposes to scope out impacts on these receptors due to the distance from all elements of the proposed development.<br>On the basis that the ES secures appropriate measures in the oCEMP and oOEMP to avoid impacts on these receptors and demonstrates agreement with the relevant consultees, the Inspectorate agrees that this matter can be scoped out of further assessment. |

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| 3.2.27 | Para 6.1.9 and Table 6.1.10 | Impacts to the following non-designated sites - all project areas / all project phases:<br>• Worsted Lodge Road Side Verge CWS<br>• Beacon Course Green Lane CWS<br>• Bottisham Park CWS<br>• Pauline's Swamp CWS<br>• St George's Churchyard CWS<br>• Burwell Brick Pit CWS<br>• Fleam Dyke Pumping Station CWS<br>• Spring Close CWS<br>• Swaffham Prior Meadow CWS<br>• Lophams Wood CWS | The Scoping Report proposes to scope out impacts to these non-designated sites for all project elements and phases on the basis that they are all outside of the proposed development area and will not be impacted.<br>On the basis that the ES secures appropriate measures in the oCEMP and oOEMP to avoid impacts on these sites and demonstrates agreement with the relevant consultees, the Inspectorate agrees that this matter can be scoped out of further assessment. |

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| | | • Leys Wood CWS | |
| 3.2.28 | Para 6.1.9 and Table 6.1.10 | Habitats: Ancient semi natural woodland – Developable Areas A, B and GCCs (all project phases) and Developable Area C and IACC (operation and decommissioning) | The Inspectorate notes that no ancient semi-natural woodland is present within 1km of Developable Areas A and B and on this basis is content that this matter can be scoped out of further assessment.<br>Regarding Developable Area C, the IACCs and GCCs, the Inspectorate notes that habitat surveys of ancient semi natural woodland have not yet been conducted and on this basis does not agree to scope this matter out at this stage. The ES should include an assessment of the effects on ancient semi natural woodland or provide evidence demonstrating agreement with the relevant consultation bodies and the absence of likely significant effects. The scope of ecological surveys should also be agreed with relevant consultation bodies, including Natural England. |
| 3.2.29 | Para 6.1.9 and Table 6.1.10 | Habitats: woodland – Developable Areas A and B (Operation) Developable Area C, IACC and GCCs (all project phases) | The Scoping Report states that the proposed development does not impact on woodlands in Developable Areas and B and suitable buffers would be incorporated into the design. On this basis, the Inspectorate agrees that this matter can be scoped out of further assessment.<br>Regarding Developable Area C, the IACCs and GCCs, the Inspectorate notes that habitat surveys of woodlands have not yet been conducted and on this basis does not agree to scope this matter out at this stage. The ES should include an assessment of the effects on woodland or provide evidence demonstrating agreement with the relevant consultation bodies and the absence of likely significant effects. The scope of ecological surveys should also be agreed with relevant consultation bodies, including Natural England. |
| 3.2.30 | Para 6.1.9 and Table 6.1.10 | Priority habitats: rivers, and streams – Developable Areas A and B, C and IACC (all project | The Scoping Report states that no rivers and streams are present within Developable Areas A and B, and while rivers and streams (including the River Stour) are located within and adjacent to Developable Area C, the IACCs and GCCs, buffers "in excess of 10m" will be included around all watercourses. |

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| | | phases), GCCs (operation). | On the basis of the information presented in the Scoping Report, the Inspectorate agrees that this matter can be scoped out of further assessment. |
| 3.2.31 | Para 6.1.9 and Table 6.1.10 | Priority habitats: hedgerows – Developable Areas A and B, C and IACC (all project phases), GCCs (operation) | Scoping Report paragraph 6.1.9 states that there is adequate existing access to Developable Areas A and B and therefore impacts to hedgerows are unlikely. On this basis, the Inspectorate agrees that impacts to hedgerows can be scoped out for Developable Areas A and B.<br>The Scoping Report proposes to scope out impacts to hedgerows for Developable Area C, the IACCs and GCCs on the basis that these areas are adjacent to Developable Areas A and B and therefore the habitats are similar. The Inspectorate notes that hedgerows have not yet been surveyed in Developable Area C, the IACCs and GCCs and considers that insufficient information on potential impacts has been provided. The ES should include an assessment of the effects on hedgerows or provide evidence demonstrating agreement with the relevant consultation bodies and the absence of likely significant effects. The scope of ecological surveys should also be agreed with relevant consultation bodies, including Natural England. |
| 3.2.32 | Para 6.1.9 and Table 6.1.10 | Priority habitats: calcareous grassland – Developable Areas A and B (all project phases), Developable Areas C, IACC and GCCs (operation) | The Scoping Report states that while there are small areas of calcareous grassland adjacent to Developable Area B, the proposed development will avoid impacts to this site, and there are no calcareous grasslands present in other project areas.<br>On the basis of the information presented in the Scoping Report, the Inspectorate agrees that this matter can be scoped out of further assessment. |
| 3.2.33 | Para 6.1.9 and | Priority habitats: grasslands (coastal floodplain grazing | The Scoping Report states that coastal floodplain grazing marsh is present within the study area but does not provide information on why this matter has been scoped out of further |

| ID | Ref | Applicant's proposed matters to scope out | Inspectorate's comments |
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| | Table 6.1.10 | marsh), Developable Areas A and B, C and IACC (all project phases), GCCs (operation) | assessment. The ES should include an assessment of impacts on coastal floodplain grazing marsh where significant effects are likely to occur. |
| 3.2.34 | Para 6.1.9 and Table 6.1.10 | Arable fields and ditches: Developable Areas A, B and C, IACC and GCCs (all project phases) | Paragraph 6.1.9 of the Scoping Report state that a minimum buffer of 10m will be employed to avoid impacts to arable fields and ditches.<br>On the basis that the ES secures appropriate measures to avoid impacts on arable fields and ditches, the Inspectorate agrees that this matter can be scoped out of further assessment. |
| 3.2.35 | Para 6.1.9 and Table 6.1.10 | Arable weeds: GCCs (operation) | On the basis that significant effects on arable weeds are unlikely to occur during operation of the proposed development, the Inspectorate is content for this matter to be scoped out of further assessment. |
| 3.2.36 | Paras 6.1.7, 6.1.9 and Table 6.1.10 | Invasive non-native species (INNS): Developable Areas A, B and C, IACC and GCCs (all project phases) | Scoping Report paragraph 6.1.7 states that while INNS have been recorded in the GCCs, they have been scoped out of further assessment as standard protocols to treat invasive species to ensure no significant impacts will be used.<br>The Inspectorate agrees that this matter can be scoped out on the basis that the mitigation measures proposed within the oCEMP and oOEMP should be sufficient to address the likely impacts and avoid a likely significant effect. The ES should include details of the mitigation and explain how its delivery is assured with reference to relevant documents. |

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| 3.2.37 | Para 6.1.9 and Table 6.1.10 | Invertebrates: (Calcareous Grasslands, Hedgerows and woodlands) – Developable Areas A and B (all phases), Developable Area C, IACC and GCC (operation) | The Scoping Report states that Developable Areas A and B (including Fleam Dyke SSSI) provide high value habitat for protected and notable invertebrates. The Inspectorate considers that there may be impacts to the calcareous grassland at Fleam Dyke SSSI and as such does not agree to scoping out impacts to invertebrates at this stage. The Inspectorate has commented on potential impacts on Fleam Dyke SSSI at ID 3.2.11. |
| 3.2.38 | Para 6.1.9 and Table 6.1.10 | Fish: Developable Areas A and B (all project phases), Developable Area C and IACCs (operation and decommissioning) and GCCs (operation) | The Scoping Report states that ditches within the proposed development area are considered unsuitable as fish habitat, and buffers of at least 10m from watercourses will be employed to avoid significant effects on fish species.<br>On the basis that the ES secures appropriate measures to avoid impacts on fish, the Inspectorate agrees that this matter can be scoped out of further assessment. |
| 3.2.39 | Para 6.1.9 and Table 6.1.10 | Otters, water vole, great crested newt (GGN) and reptiles: Developable Areas A and B, C, IACC and GCCs (all project phases) | The Scoping Report states that whilst the proposed development area may contain suitable habitat for these species, no surveys have been completed to date. The Inspectorate considers that insufficient information has been provided to justify scoping these matters out at this stage. The ES should include an assessment of the effects on otters, water vole, GCN and reptiles, or provide evidence demonstrating agreement with the relevant consultation bodies and the absence of likely significant effects. The scope of ecological surveys should also be agreed with relevant consultation bodies, including Natural England. |

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| | | | The applicant's attention is drawn to the comments from the Environment Agency (appendix 2 of this Opinion) regarding the current lack of survey data for otters and water vole. |
| 3.2.40 | Para 6.1.9 and Table 6.1.10 | Common amphibians: all project areas / phases | The Scoping report states that the proposed development area may contain suitable habitat for amphibians but does not provide information on why this matter has been scoped out of further assessment. The Inspectorate therefore does not agree to scope this matter out at this stage.<br>The ES should include an assessment of the effects on common amphibians or provide evidence demonstrating agreement with the relevant consultation bodies and the absence of likely significant effects. The scope of ecological surveys should also be agreed with relevant consultation bodies, including Natural England. |
| 3.2.41 | Para 6.1.9 and Table 6.1.10 | Ground nesting birds: Developable Areas A, B and C, IACCs and GCCs (operation) | The Scoping Report states that compensation habitat will be created prior to construction for displacement of ground nesting birds and given that this will remain in place during operation significant effects are not expected.<br>On the basis that the ES secures appropriate compensation habitat to avoid impacts on ground nesting birds and demonstrates agreement with the relevant consultees, the Inspectorate agrees that this matter can be scoped out of further assessment. |
| 3.2.42 | Para 6.1.9 and Table 6.1.10 | Non-ground nesting birds: Developable Areas A, B and C and IACCs (all project phases) and GCCs (operation) | The Scoping Report proposes to scope out impacts on non-ground nesting birds on the basis that no trees are anticipated to be lost or impacted within the Proposed Development area, and buffers will be used to avoid indirect impacts on non-ground nesting bird habitat.<br>On the basis that the ES secures appropriate measures in the oCEMP and oOEMP to avoid impacts on non-ground nesting birds and demonstrates agreement with the relevant consultees, the Inspectorate agrees that this matter can be scoped out of further assessment. |

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| 3.2.43 | Para 6.1.9 and Table 6.1.10 | Turtle dove: Developable Areas A, B and C and IACCs (operation) and GCCs (all project phases) | The Scoping Report states that a probable breeding pair of county level importance turtle dove were recorded within Developable Area A during 2024 breeding bird surveys, and Developable Area B also contains suitable nesting habitat for this species. Developable Area C, the IACCs and GCCs have not yet been surveyed but are also considered to have suitable nesting habitat for turtle dove.<br><br>The Scoping Report states that as compensation habitat created prior to construction for displacement of turtle doves will remain in place during operation significant effects are not expected and therefore impacts during operation have been scoped out.<br><br>On the basis that the ES secures appropriate compensation habitat to avoid impacts on turtle doves and demonstrates agreement with the relevant consultees, the Inspectorate agrees that impacts on turtle doves during operation of Developable Areas A to C and the IACCs can be scoped out of further assessment.<br><br>Regarding the GCCs, given that surveys have not yet been carried out, the Inspectorate considers that insufficient information has been provided to justify scoping this matter out at this stage. The ES should include an assessment of the effects on turtle doves or provide evidence demonstrating agreement with the relevant consultation bodies and the absence of likely significant effects. The scope of ecological surveys should also be agreed with relevant consultation bodies, including Natural England. |
| 3.2.44 | Para 6.1.9 and Table 6.1.10 | Wintering birds – Developable Areas A, B and C and IACCs (operation) | The Scoping Report states that surveys undertaken in 2023/2024 in Developable Areas A and B considered the wintering bird assemblage present to be of county level importance, and the wintering raptor assemblage potentially of county level importance. The Scoping Report acknowledges that construction and decommissioning of the proposed development could disturb foraging wintering birds and reduce suitable foraging habitat, and on this basis wintering birds have been scoped in for further assessment for these project phases.<br><br>The Scoping Report states that as compensation habitat created prior to construction for displacement of wintering birds will remain in place during operation significant effects are |

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| | | | not expected and therefore impacts on wintering birds during operation have been scoped out.<br><br>The Inspectorate notes that wintering bird surveys have not yet been completed for Developable Area C, the IACCs and GCCs and on this basis is not in a position to scope this matter out at this stage. The ES should include an assessment of the effects on wintering birds during operation or provide evidence demonstrating agreement with the relevant consultation bodies and the absence of likely significant effects. The scope of ecological surveys should also be agreed with relevant consultation bodies, including Natural England. |
| 3.2.45 | Para 6.1.9 and Table 6.1.10 | Peregrine, barn owl and other raptors: Developable Areas A, B and C and IACCs (all project phases), GCCs (construction and decommissioning) | The Scoping report states that these species are present in Developable Area B and given the similar habitat may also be present in other areas of the proposed development that have not yet been surveyed.<br><br>The Inspectorate considers that insufficient information has been provided to justify scoping these matters out at this stage. The ES should include an assessment of the effects on peregrine, barn owl and other raptors or provide evidence demonstrating agreement with the relevant consultation bodies and the absence of likely significant effects. The scope of ecological surveys should also be agreed with relevant consultation bodies, including Natural England. |
| 3.2.46 | Para 6.1.9 and Table 6.1.10 | Bats: foraging and commuting - GCC (operation) | The Inspectorate notes that the justification for scoping out impacts on foraging and commuting bats during operation refers to impacts on watercourses and fish, and thus the applicant's proposed approach is unclear.<br><br>The ES should include an assessment of the effects on foraging and commuting bats or provide evidence demonstrating agreement with the relevant consultation bodies and the absence of likely significant effects. The scope of ecological surveys should also be agreed with relevant consultation bodies, including Natural England. |

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| 3.2.47 | Para 6.1.9 and Table 6.1.10 | Bats: roosting - Developable Areas A, B and C and IACCs (all project phases) and GCCs (operation) | The Scoping Report states that Developable Areas A and B may contain suitable roosting habitat for bats, and that bat surveys have not yet been completed for Developable Area C, the IACCs and GCCs.<br><br>The Inspectorate considers that insufficient information has been provided to justify scoping this matter out at this stage. The ES should include an assessment of the effects on roosting bats or provide evidence demonstrating agreement with the relevant consultation bodies and the absence of likely significant effects. The scope of ecological surveys should also be agreed with relevant consultation bodies, including Natural England. |
| 3.2.48 | Para 6.1.9 and Table 6.1.10 | Hazel dormouse: Developable Areas A, B C, IACC and GCCs (all project phases) | The Scoping Report proposes to scope out impacts on Hazel Dormice on the basis that there are no records of this species within 2km of the Developable Areas, IACCs and GCCs.<br><br>The Inspectorate notes that surveys for this species have not yet been undertaken, and on this basis is not in a position to scope this matter out at this stage. The ES should include an assessment of the effects on hazel dormice or provide evidence demonstrating agreement with the relevant consultation bodies and the absence of likely significant effects. The scope of ecological surveys should also be agreed with relevant consultation bodies, including Natural England.<br><br>The applicant's attention is drawn to the comments from East Cambridgeshire District Council (appendix 2 of this Opinion) advising the applicant to consult Cambridgeshire & Peterborough Environmental Records Centre (CPERC) and not solely the People's Trust of Endangered Species (2018), to ensure a more holistic understanding of local species including the hazel dormouse. |

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| 3.2.49 | Para 6.1.9 and Table 6.1.10 | Badgers: Developable Areas A, B and C and IACCs (all project phases) and GCCs (operation) | The Scoping Report states that badger setts have been identified in Developable Areas A and B, and Developable Areas C, the IACC and the GCCs have not yet been surveyed. The Inspectorate notes that the design of the proposed development will seek to avoid badger setts and where this is not possible, a badger licence for disturbance / closure will be applied for via Natural England.<br><br>On the basis that the ES secures appropriate measures in the oCEMP and oOEMP to avoid impacts on badgers the Inspectorate agrees that this matter can be scoped out of further assessment. |
| 3.2.50 | Para 6.1.9 and Table 6.1.10 | Other small mammals: brown hare, hedgehog, harvest mouse and polecat - Developable Areas A and B, C, IACC and GCCs (all project phases). | The Scoping Report states that brown hare and habitat suitable for hedgehogs were recorded within Developable Areas A and B.<br><br>The Inspectorate considers that insufficient information has been provided to justify scoping this matter out at this stage. The ES should include an assessment of the effects on these species or provide evidence demonstrating agreement with the relevant consultation bodies and the absence of likely significant effects. The scope of ecological surveys should also be agreed with relevant consultation bodies, including Natural England. |

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| 3.2.51 | Para 6.1.4 | Surveys to inform baseline | Paragraph 6.1.4 of the Scoping Report states that ecological surveys are ongoing or due to be completed in 2025. The Inspectorate considers that the possibility of identifying further ecological receptors remains. The ES must report the full survey findings and list all receptors identified as potentially present on site and assess significant effects where they are likely to occur. |

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| 3.2.52 | Para 2.7.40 | Minimum buffers to offset ecological features | The Inspectorate notes that many of the mitigation or compensation measures set out in the biodiversity chapter of the Scoping Report rely on the use of buffer zones to minimise impacts and avoid significant effects. The Inspectorate notes that it is not clear how the minimum buffers have been determined. Appropriate buffer zone distances should be defined in the ES, with reference to how this is secured through the DCO. The applicant should make effort to agree these buffer zones with the relevant consultation bodies, including Natural England. |
| 3.2.53 | Paras 2.9.1, 6.1.7 and 6.1.8 | Lighting | The Inspectorate notes that paragraphs 2.9.11, 6.1.7 and 6.1.8 of the Scoping Report state that construction and operational lighting will be required. The ES should include an assessment of the effects of additional lighting on ecological receptors within the proposed Development Areas where significant effects are likely to occur. |
| 3.2.54 | Paras 6.1.7 and 6.1.8 | Mitigation - birds | Scoping Report paragraphs 6.1.7 and 6.1.8 refer to potentially significant impacts to ground-nesting birds, wintering birds and turtle dove in the absence of mitigation and the use of compensation to avoid significant impacts. The applicant should detail the location, extent, implementation (including specific timings) and management of proposed compensation areas in the ES, with reference to available evidence on the requirements of relevant species. Effort should be made to discuss and agree these details with relevant consultation bodies, including Natural England. |
| 3.2.55 | Para 6.1.7 | Description of likely significant effects – noise and vibration | Scoping Report paragraph 6.1.7 does not refer to likely significant impacts from noise and vibration on ecological receptors, other than referencing potential impacts to turtle doves. Whilst there is no explicit reference to consideration of impacts from noise and vibration in the biodiversity section of the Scoping Report, the Inspectorate considers such impacts should be assessed further for all potentially affected ecological receptors during construction and decommissioning. |

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| 3.2.56 | n/a | Confidential annexes | Public bodies have a responsibility to avoid releasing environmental information that could bring about harm to sensitive or vulnerable ecological features. Specific survey and assessment data relating to the presence and locations of species such as badgers, rare birds and plants that could be subject to disturbance, damage, persecution, or commercial exploitation resulting from publication of the information, should be provided in the ES as a confidential annex. All other assessment information should be included in an ES chapter, as normal, with a placeholder explaining that a confidential annex has been submitted to the Inspectorate and may be made available subject to request. |

## 3.3 Landscape and visual amenity

(Scoping Report Section 6.2

| ID | Ref | Applicant's proposed matters to scope out | Inspectorate's comments |
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| 3.3.1 | Para 6.2.9 | National Character Areas (NCAs) | The applicant proposes to scope out effects on NCAs on the basis that the focus of the assessment will be on county and local level landscape character areas. The Inspectorate considers NCAs to be sensitive receptors within their own right and considers that the ES should identify, locate and assess impacts to NCAs where there is the potential for significant effects to occur. |
| 3.3.2 | Para 6.2.9 | Local Character Areas (LCAs) located beyond the site boundary but within the 3km study area | The Scoping Report states that this matter has been scoped out as effects on LCAs beyond the site boundary are expected to be indirect and not significant. However, the Zone of Theoretical Visibility (ZTV) illustrated in appendix H, figures H.1 and H.2 show that the proposed development would be visible within the 3km study area and therefore have potential to impact LCAs. The ES should identify, locate and assess both direct and indirect impacts to LCAs within the study area where significant effects are likely to occur. |
| 3.3.3 | Para 6.2.9 | Characters areas beyond 3km study area | The Inspectorate agrees that an assessment of effects on character areas beyond the study can be scoped out of further assessment; however, the ZTV should be reviewed according to the final proposed development parameters and presented in the ES to demonstrate that there is no potential for significant effects to occur. |
| 3.3.4 | Para 6.2.9 | National landscape designations | The Inspectorate is content to scope this matter out on the basis that there are no national landscape designations located within 5km of the proposed development. The Scoping Report does not confirm the distance between the site boundary and nearest national landscape designation, this information should be provided in the ES. |
| 3.3.5 | Para 6.2.9 | Visual impacts on the following residential receptors: | The Scoping Report proposes to scope out visual effects on these residential receptors on the basis that they are located over 2km from the site boundary and views of the proposed development would be occasional and unlikely to be significant. The ZTV |

| ID | Ref | Applicant's proposed matters to scope out | Inspectorate's comments |
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| | | • Little Abington<br>• Great Abington<br>• Hildersham<br>• Babraham<br>• Wicken | illustrated in Appendix H, Figures A.1 show that the solar PV panels will be visible beyond 3km. The ES should assess potential effects on views and visual amenity within the ZTV where significant effects are likely to occur.<br>The ES should assess the visual impacts on these receptors or provide evidence demonstrating agreement with the relevant consultation bodies and the absence of likely significant effects. |
| 3.3.6 | Para 6.2.9 | Visual impacts on the following key transport routes:<br>• A11<br>• A14<br>• A1303 | The Scoping Report states that an assessment of these matters has been scoped out due to the transient nature of the views as well as the presence of existing vegetation and infrastructure. However, all three of the key transport routes pass directly through the grid connection corridors.<br>The Inspectorate considers that the ES should assess the visual impacts on these receptors or provide evidence demonstrating agreement with the relevant consultation bodies and the absence of likely significant effects. |
| 3.3.7 | Para 6.2.9 | Visual impact on the Gog Magog Hills and Wandlebury Country Park | The Scoping Report states that the Gog Magog Hills and Wandlebury Country Park is located outside of the study area and due to the distance and intervening vegetation, potential visual impacts would be limited. The Inspectorate agrees that an assessment of visual effects on receptors beyond the study area can be scoped out of further assessment; however, the ZTV should be reviewed according to the final proposed development parameters and presented in the ES to demonstrate that there is no potential for significant effects to occur. |
| 3.3.8 | Para 6.2.9 | Visual impacts on visitors to registered parks and gardens | The applicant proposes to scope out an assessment of the visual impacts on visitors to Registered Parks and Gardens located within the study area on the basis that views towards the proposed development would be limited.<br>The ES should assess the visual impacts on these receptors or provide evidence that there is no intervisibility between the proposed development and registered parks and |

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|---|---|---|---|
| | | | gardens within the study area, this should include reference to the ZTV and agreement with the relevant consultation bodies. |
| 3.3.9 | Para 6.2.9 | Visual impacts to visitors to Fulbourn Fen Nature Reserve and Meg's Mount | Whilst both of these receptors are located in close proximity to the proposed development, the Scoping Report states that an assessment of these matters have been scoped out on the basis that both of these receptors are located outside of the ZTV.<br><br>The Inspectorate agrees that an assessment of operational visual effects on receptors located outside the ZTV can be scoped out of further assessment; however, the ZTV should be reviewed according to the final proposed development parameters and presented in the ES to demonstrate that there is no potential for significant effects to occur. The ES should consider the potential for temporary visual effects on these receptors during construction and decommissioning. |
| 3.3.10 | Para 6.2.9 | Visual receptors beyond 3km study area | The Inspectorate agrees that an assessment of visual effects on receptors beyond the study area can be scoped out of further assessment; however, the ZTV should be reviewed according to the final proposed development parameters and presented in the ES to demonstrate that there is no potential for significant effects to occur. |
| 3.3.11 | Para 6.2.9 | Lighting impacts – all phases | The ES should explain the construction and operational lighting strategy and how the lighting design has been developed to minimise light spill and the effect of intermittent lighting on human and ecological receptors. The ES should provide an assessment of lighting effects during construction, operation and decommissioning, including a night-time assessment, or the information required to demonstrate the absence of potential significant effects. Cross references should be made to other relevant aspect assessments and sensitive receptors (such as ecology and cultural heritage). |

| ID | Ref | Description | Inspectorate's comments |
|---|---|---|---|
| 3.3.12 | Para 6.2.2 | ZTV | The applicant should demonstrate how their approach to using a ZTV complies with the Landscape Institute's guidance on establishing a ZTV for the landscape and visual impact assessment (LVIA). The Landscape Institute's ZTV approach treats the world as 'bare earth' and does not take account of potential screening by vegetation or buildings. |
| 3.3.13 | Para 6.2.2 | GCCs – study area | The ES should justify the extent of the study areas used for the GCCs and IACCs with reference to recognised professional guidance and the extent of the likely impacts, informed by fieldwork and relevant models or approaches such as the ZTV. The applicant should agree the study areas with relevant consultation bodies where possible. |
| 3.3.14 | Para 6.2.6 | Decommissioning | The Scoping Report states that whilst decommissioning phase effects are scoped into the ES, they will be similar to those identified for construction and as such, the effects assessed for construction of the proposed development will stand as a reasonable worst-case scenario in lieu of a separate decommissioning assessment. It is the Inspectorates opinion that decommissioning should be considered as distinct from construction with any potential effects considered separately. |
| 3.3.15 | Para 6.2.6 | Decommissioning mitigation | The Scoping Report states that no additional mitigation is envisaged during decommissioning of the proposed development. Where the avoidance of a likely significant effect is reliant on mitigation measures, these should be described within the ES along with the proposed methods by which they will be secured through the DCO, assisted by a plan or figures where appropriate. |
| 3.3.16 | n/a | Viewpoints | The Inspectorate advises that the ES should include confirmation of the consultation undertaken, together with evidence of agreement about the final viewpoint selection. Where any disagreement remains, an explanation as to how the final selection was made should be provided taking into account the factors that are identified as relevant to viewpoint selection within GLVIA 3. Viewpoint locations should be identified on a plan within the ES. Baseline viewpoint photography for summer and winter should also be provided. |

## 3.4 Cultural heritage

(Scoping Report Section 6.3)

| ID | Ref | Applicant's proposed matters to scope out | Inspectorate's comments |
|---|---|---|---|
| 3.4.1 | Para 6.3.10 | Impacts to designated heritage assets beyond site boundary and within 2km study area – construction and decommissioning | The Scoping Report proposes to scope out this matter on the basis that construction and decommissioning impacts would be temporary and activities would be controlled through the oCEMP and oDEMP, respectively. The Inspectorate considers that noise, vibration, dust, traffic, lighting and visual disturbance associated with construction and decommissioning could impact on the setting of designated heritage assets beyond the site boundary. There is also a lack of information at this stage regarding the likely duration and location of construction activities in relation to heritage assets.<br><br>The Inspectorate does not consider sufficient information has been presented to provide confidence that significant effects would not occur. The ES should include an assessment of the effects on the designated heritage assets during construction and decommissioning or provide evidence demonstrating agreement with the relevant consultation bodies and the absence of likely significant effects. |
| 3.4.2 | Para 6.3.10 | Impacts to non-designated barrows/ ring ditches beyond site boundary and within the 2km study area – construction and decommissioning | The Scoping Report proposes to scope out this matter on the basis that construction and decommissioning impacts would be temporary and activities would be controlled through the oCEMP and oDEMP, respectively. The Inspectorate considers that noise, vibration, dust, traffic, lighting and visual disturbance associated with construction and decommissioning could impact on the setting of non-designated barrows/ ring ditches assets beyond the site boundary. There is also a lack of information at this stage regarding the likely duration and location of construction activities in relation to heritage assets.<br><br>The Inspectorate does not consider sufficient information has been presented to provide confidence that significant effects would not occur. The ES should include an assessment of the effects on the designated heritage assets during construction and decommissioning or provide evidence demonstrating agreement with the relevant consultation bodies and the absence of likely significant effects. |

| ID | Ref | Applicant's proposed matters to scope out | Inspectorate's comments |
|---|---|---|---|
| 3.4.3 | Para 6.3.10 | Impacts to non-designated heritage assets beyond the site boundary | The Scoping Report states that there would be no direct impact on these assets as they are located outside of the proposed development site. The Inspectorate agrees that direct physical impacts to non-designated heritage assets located outside the site boundary can be scoped out of further assessment.<br><br>The Inspectorate notes that the scoping report does not contain information about location of non-designated heritage assets within the context of the ZTV. The ES should assess potential effects on the setting of non-designated heritage assets within the ZTV where there is potential for significant effects to occur. In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope these matters from the assessment. The ES should assess the impacts on non-designated heritage assets or provide evidence demonstrating agreement with the relevant consultation bodies and the absence of likely significant effects. |
| 3.4.4 | Para 6.3.10 | Findspots recorded by Cambridgeshire Historic Environment Record (HER) | The Scoping Report explains that as findspots, these have been removed from the site and the heritage significance of their former locations would not be harmed by the Proposed Development. The applicant's attention is directed to the comments made by Historic England (appendix 2 of this Opinion) in regard to findspots. The Inspectorate considers that the ES should assess the impacts of the proposed development on findspots where there is potential for significant effects to occur. |

| ID | Ref | Description | Inspectorate's comments |
|---|---|---|---|
| 3.4.5 | Para 6.3.2 | Study area | The Scoping Report states that a 2km study area will be used for the cultural heritage assessment. However, designated heritage assets within 3km of the site that are particularly sensitive to changes in their setting will also be considered. The inclusion of designated heritage assets beyond the 2km study area will be determined by professional judgement. It should be clear how the approach taken towards determining the study area ensures that any heritage assets or conservation areas with long views towards or out from |

| ID | Ref | Description | Inspectorate's comments |
|---|---|---|---|
| | | | the proposed development have been identified and considered. The study area should be agreed with the relevant consultation bodies and informed by site visit(s) and visual analysis in the form of understanding the ZTV. The final study areas and locations of the heritage assets should be depicted on supporting plan(s). |
| 3.4.6 | Para 6.3.4 | Archaeological fieldwork | The applicant should ensure that the information used to inform the assessment is robust and allows for suitable identification of below ground assets likely to be impacted by the proposed development. The applicant should make effort to agree the need for intrusive investigations, such as trial trenching, with relevant consultation bodies. Intrusive investigations should be completed prior to submission of the DCO application and reported in the ES, unless otherwise agreed with the relevant consultation bodies. |

## 3.5 Land, soils and groundwater

(Scoping Report Section 6.4)

| ID | Ref | Applicant's proposed matters to scope out | Inspectorate's comments |
|---|---|---|---|
| 3.5.1 | Para 6.4.9 | Land (potential contamination) - operation | The Scoping Report proposes to scope out potential land contamination during operation of the proposed development on the basis that any impacts would be controlled by the requirements of the oOEMP and the oDEMP. Considering the characteristics of the operational phase of the proposed development, the Inspectorate is content that land contamination is unlikely to result in significant effects and therefore this matter can be scoped out of further assessment. However, the ES should describe any measures in place to reduce the potential for contamination during operation, such as measures to prevent discharge, leakage, or fire from the BESS and any chemicals required for washing of PV panels if proposed. |
| 3.5.2 | Para 6.4.9 | Groundwater (potential contamination) - operation | The applicant's attention is directed to the comments made by the Environment Agency (appendix 2 of this Opinion) in regard to the high sensitivity of groundwater resources within the developable areas. In the absence of information detailing the proposed drainage strategy and number and location of BESS and substation structures, the Inspectorate is not in a position to agree to scope these matters from the assessment. The ES should assess the potential impacts of the proposed development on groundwater contamination during operation or provide evidence demonstrating agreement with the relevant consultation bodies and the absence of likely significant effects. |
| 3.5.3 | 6.4.9 | Land (geological units) | The Scoping Report proposes to scope out this matter on the basis that there are unlikely to be substantial excavation or earthworks operations that could result in significant effects on geological units. The Inspectorate agrees that an assessment of geological units can be scoped out of further assessment. |

| ID | Ref | Applicant's proposed matters to scope out | Inspectorate's comments |
|---|---|---|---|
| 3.5.4 | 6.4.9 | Land (geological conservation review sites) | The Inspectorate is content to scope this matter out on the basis that there are no geological SSSIs located within 250m of the proposed development. |
| 3.5.5 | 6.4.9 | Land (mineral safeguarding) | The Scoping Report proposes to scope out an assessment of impacts on Mineral Safeguarding Areas (MSAs) on the basis that a mineral safeguarding assessment will form part of the Planning Statement which will be submitted in support of the DCO application.<br><br>The Inspectorate does not have sufficient information at this stage to exclude the possibility of significant effects to mineral resources. The ES should include an assessment of the sterilisation of mineral resources during the lifetime of the proposed development or provide evidence demonstrating agreement with the relevant consultation bodies and the absence of likely significant effects. This should be supported by evidence of consultation with the relevant Mineral Planning Authority and a plan depicting the locations and extent of any MSAs in relation to the proposed development |
| 3.5.6 | 6.4.9 | Land (geological hazards) – developable areas and IACC | The applicant proposes to scope this matter out on the basis that all geological hazards have been identified as 'no' hazard to 'low' hazard. The Inspectorate agrees that an assessment of geological hazards can be scoped out of further assessment. |

| ID | Ref | Description | Inspectorate's comments |
|---|---|---|---|
| 3.5.7 | 2.9.1<br>6.4.6 | Soil Management | The Scoping Report states that an outline Soil Management Plan (oSMP) will be produced, detailing measures to reduce or avoid damage to soils. For clarity, the oSMP should be provided with the application along with the proposed methods by which it will be secured in the DCO. |
| 3.5.8 | 6.4.7 | Soil resources | The ES should include an assessment of the effects on soil resources and soil structure, due to the potential for soils stripping during construction, compaction from construction and decommissioning activity and to identify potential measures for appropriate soil |

| ID | Ref | Description | Inspectorate's comments |
|---|---|---|---|
| | | | handling and storage, as well as setting out how any potential adverse impacts can be avoided or minimised. |
| 3.5.9 | 6.4.7 | Soils - hydrology | The Scoping Report does not consider the potential impacts on soil quality due to changes in the hydrological regime. The ES should consider the impact of hydrology and hydrogeology changes on soil quality within the site and any potential implications for the wider area. |

## 3.6 Air Quality

(Scoping Report Section 6.5)

| ID | Ref | Applicant's proposed matters to scope out | Inspectorate's comments |
|---|---|---|---|
| 3.6.1 | Para 6.5.9 | Dust and particulate matter emissions resulting from demolition | On the basis that there are no demolition works proposed during construction phase, the Inspectorate agrees that this matter may be scoped out. |
| 3.6.2 | Para 6.5.9 | Dust and particulate matter emissions resulting from operation and maintenance and road traffic exhaust emissions during operation. | Given the nature of the proposed development, the Inspectorate agrees that significant effects from dust and particulate matter emissions from the operational phase of the proposed development are unlikely and that this matter can be scoped out of further assessment.<br>Paragraph 6.5.9 of the Scoping Report states that there will be limited movement of vehicles to the site for operation and maintenance purposes. On this basis, the Inspectorate is content that road traffic exhaust emissions during operation can be scoped out of further assessment. However, the ES should confirm the operational vehicle types and numbers (with reference to thresholds within guidance) to justify this position. |

| ID | Ref | Description | Inspectorate's comments |
|---|---|---|---|
| 3.6.3 | Para 6.5.3 – 6.5.5 | Baseline data | Paragraph 6.5.3 of the Scoping Report proposes to characterise baseline ambient air quality by way of a desk study. Paragraph 6.5.5 states that the closest monitoring site is located approximately 7km southwest of the application site. The applicant should ensure that the baseline can be adequately characterised through a desk study and effort should be made to reach agreement with relevant consultation bodies, including the local authorities, as to whether any additional survey or monitoring work is required. |

| ID | Ref | Description | Inspectorate's comments |
|---|---|---|---|
| 3.6.4 | Para 6.5.2 | Location of receptors | The ES should be accompanied by an appropriate plan illustrating the location of sensitive air quality receptors within the vicinity of the proposed development to aid understanding of the extent of effects. |
| 3.6.5 | n/a | Scope of air quality assessment | The applicant's attention is drawn to the comments of South Cambridgeshire District Council (appendix 2 of this Scoping Opinion) in relation to the assessment of the potential impacts of a BESS fire on air quality. |
| 3.6.6 | n/a | PM2.5 emissions | The applicant's attention is drawn to the Defra advice 'PM2.5 Targets: Interim Planning Guidance'. The ES should explain how key sources of air pollution within the proposed development have been identified and how action has been taken to minimise emissions of PM2.5 or its precursors. |

## 3.7 Noise and Vibration

(Scoping Report Section 6.6)

| ID | Ref | Applicant's proposed matters to scope out | Inspectorate's comments |
|---|---|---|---|
| 3.7.1 | Para 6.6.9 | Vibration impacts from solar PV panels and BESS – operation | The Scoping Report proposes to scope out vibration impacts during operation on the basis that levels of vibration associated with the solar PV and BESS will be low and are highly unlikely to be perceptible over the distance ranges between the plant and the nearest residential dwelling.<br><br>On this basis, the Inspectorate agrees that significant effects are not likely and this matter can be scoped out of the ES. However, the detailed description of the proposed development within the ES should demonstrate that operational plant and equipment (substations and battery storage infrastructure) is of a type and to be used in locations that would be unlikely to result in significant vibration effects on sensitive receptors. |
| 3.7.2 | Para 6.6.9 | Road traffic noise – operation | The Inspectorate is content that minimal road traffic movements would occur during operation and that significant effects are unlikely. On this basis, this matter can be scoped out of further assessment. However, the ES should confirm access routes and the operational vehicle types and numbers (with reference to thresholds within guidance) to justify this position. |
| 3.7.3 | Para 6.6.9 | SSSIs and SACs – all project phases | Para 6.6.9 states that "*SSSIs and SACs within and in close proximity respectively to the Developable Areas, Inter Array Connection Corridors and Grid Connection Corridor are not considered to be sensitive to noise and vibration".* The Inspectorate considers that there is insufficient evidence to support scoping this matter out at this stage. Accordingly, the ES should include an assessment of these matters or information demonstrating agreement with the relevant consultation bodies that significant effects are unlikely. |

| ID | Ref | Description | Inspectorate's comments |
|---|---|---|---|
| 3.7.4 | Para 6.6.4 and 6.6.5 | Noise sensitive receptors and baseline survey | The Scoping Report states that the extent and number of noise sensitive receptors will be determined following refinement of a preferred alignment and locations of associated infrastructure. The ES should explain the basis on which receptor locations are determined to be representative and include a plan showing the location of all sensitive receptors identified for assessment to aid understanding of the potential for significant effects relating to noise. Effort should be made to agree the sensitive receptors and locations for the baseline noise survey with relevant consultation bodies. |

## 3.8 Traffic and transport

(Scoping Report Section 6.7)

| ID | Ref | Applicant's proposed matters to scope out | Inspectorate's comments |
|---|---|---|---|
| 3.8.1 | Para 6.7.9 | Traffic and transport impacts – operation | The Scoping Report proposes to scope out the following matters for the operational phase:<br>• Severance of communities<br>• Road vehicle and passenger delay<br>• Non-motorised user delay<br>• Non-motorised amenity<br>• Fear and intimidation on and by road users<br>• Road user and pedestrian safety<br>The Scoping Report states that impacts on the local road system during operation are expected to be minimal. On this basis, the Inspectorate is content that this matter can be scoped out of the ES. However, the ES should confirm the operational vehicle types and numbers (with reference to thresholds within relevant guidance) to justify this position. |

| ID | Ref | Description | Inspectorate's comments |
|---|---|---|---|
| 3.8.2 | Para 6.7.6 | Potential highway works | The Scoping Report states that highway widening or adjustments may be required in the vicinity of the proposed development to facilitate construction access. The ES should include a description of these works and provide an assessment of significant effects where these are likely to occur. |
| 3.8.3 | 6.7.2 | Study area | Paragraph 6.7.2 of the Scoping Report states that "*the majority of the total construction traffic (including staff trips) would travel to the Site along the above links to access the Site, as shown in Figure 2-3*". The Inspectorate is unable to locate figure 2.3 within the Scoping |

| ID | Ref | Description | Inspectorate's comments |
|---|---|---|---|
| | | | Report. The ES should establish the study area for traffic and transport with reference to the extent of the likely impacts. The applicant should agree the study area with relevant consultation bodies where possible. |

## 3.9 Population

(Scoping Report Section 6.8)

| ID | Ref | Applicant's proposed matters to scope out | Inspectorate's comments |
|---|---|---|---|
| 3.9.1 | Para 6.8.9 | Impacts on private properties and housing – all project phases | The Scoping Report states that no commercial or residential properties are at risk of demolition, and no land within the proposed development boundary is allocated for future residential development. The Inspectorate agrees that significant effects are unlikely in relation to private property and housing and is content that this matter can be scoped out. |
| 3.9.2 | Para 6.8.9 | Impacts on common land and community assets – all project phases | The Scoping Report states that the proposed development will not impact access to any common land or community assets, and visual impacts associated with the operational phase of the Scheme will be assessed in the landscape and visual impact assessment.<br>Given the nature of the proposed development and the information provided within the Scoping Report, the Inspectorate agrees that significant effects on common land and community assets are not likely, and these matters can be scoped out of further assessment. |
| 3.9.3 | Para 6.8.9 | Impacts on accommodation occupancy rates – operation | The Scoping Report states that the proposed development is unlikely to result in significant additional demand on accommodation during operation. Subject to confirmation of likely operational staff numbers, the Inspectorate is content to scope this matter out. |

| ID | Ref | Description | Inspectorate's comments |
|---|---|---|---|
| 3.9.4 | Para 6.8.8 | Baseline / Study area | For ease of understanding, the Inspectorate recommends that any receptors identified in section 6.8.8 are mapped on figures within the ES. |

| ID | Ref | Description | Inspectorate's comments |
|---|---|---|---|
| 3.9.5 | Paras 6.8.9 and 6.8.12 | Workforce | The Scoping Report states that the construction of the proposed development will result in a large number of construction staff, however the number of construction workers is yet to be confirmed.<br><br>The ES should provide the anticipated number of jobs proposed to be created for each of the phases of the proposed development and consider the potential impact of construction workers on capacity of local accommodation and services. |

## 3.10 Climate

(Scoping Report Section 6.9)

| ID | Ref | Applicant's proposed matters to scope out | Inspectorate's comments |
|---|---|---|---|
| 3.10.1 | Para 6.9.9 | Climate change risk – all project phases | Risks from climate change are proposed to be scoped out on the basis that impacts are not likely to be considered significant during the proposed development's lifetime, and potential risks to human health will be considered within other ES chapters such as land, soils, and groundwater, population, major accidents and disasters and flooding.<br>The Inspectorate is content with this approach. However, the ES should explain how the proposed development has been designed to be resilient to climate change risks and provide clear cross-referencing to where potential risks to human health have been considered in the ES. |
| 3.10.2 | Para 6.9.9 | In-combination impact assessment – all project phases | The Scoping Report proposes to scope out an in-combination impact assessment for all project phases on the basis that the resilience of receptors identified in other chapters is unlikely to be affected by a combination of future climate change and the impacts of the proposed Development.<br>The Inspectorate agrees that the proposed development, in combination with changes in climate are unlikely to result in significant effects upon receptors identified by other environmental disciplines. These matters can be scoped out of the ES.<br>The Inspectorate notes that the potential in-combination impacts of heavy precipitation and the proposed development will be assessed within the FRA to be submitted as part of the DCO application. The Inspectorate is content with this approach. |

| ID | Ref | Description | Inspectorate's comments |
|---|---|---|---|
| 3.10.3 | | | n/a |

## 3.11 Cumulative effects

(Scoping Report Section 7)

| ID | Ref | Applicant's proposed matters to scope out | Inspectorate's comments |
|---|---|---|---|
| 3.11.1 | NA | NA | No matters have been proposed to be scoped out of the assessment. |

| ID | Ref | Description | Inspectorate's comments |
|---|---|---|---|
| 3.11.2 | NA | Cumulative development location | The ES should include information on the location of the developments included in the cumulative effects assessment and the distance from the proposed development. This should be supported by a plan depicting the locations and extent of cumulative developments in relation to the proposed development. |

# APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

## TABLE A1: PRESCRIBED CONSULTATION BODIES

Bodies prescribed in Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended) (the 'APFP Regulations (as amended)')

| SCHEDULE 1 DESCRIPTION | ORGANISATION |
|---|---|
| The Secretary of State for Defence | Ministry of Defence |
| The relevant parish council(s) | Burwell Parish Council |
| | Reach Parish Council |
| | Swaffham Prior Parish Council |
| | Swaffham Bulbeck Parish Council |
| | Little Wilbraham Parish Council |
| | Great Wilbraham Parish Council |
| | Dullingham Parish Council |
| | Burrough Green Parish Council |
| | Brinkley Parish Council |
| | Carlton cum Willingham Parish Council |
| | West Wratting Parish Council |
| | Balsham Parish Council |
| | West Wickham Parish Council |
| | Bottisham Parish Council |
| | Wicken Parish Council |
| | Waterbeach Parish Council |
| | Fordham Parish Council |

| SCHEDULE 1 DESCRIPTION | ORGANISATION |
|---|---|
| | Exning Parish Council |
| | Newmarket Parish Council |
| | Stow Cum Quay Parish Council |
| | Stetchworth Parish Council |
| | Teversham Parish Council |
| | Fulbourn Parish Council |
| | Babraham Parish Council |
| | Little Abington Parish Council |
| | Hildersham Parish Council |
| | Linton Parish Council |
| | Withersfield Parish Council |
| | Little Thurlow Parish Council |
| | Great Thurlow Parish Council |
| | Horseheath Parish Council |
| | Great Bradley Parish Council |
| | Weston Colville Parish Council |
| | Lode Parish Council |
| | Westley Waterless Parish Council |
| The Environment Agency | Environment Agency |
| Natural England | Natural England |
| The Forestry Commission | Forestry Commission |
| The Historic Buildings and Monuments Commission for England (known as Historic England) | Historic England |

| SCHEDULE 1 DESCRIPTION | ORGANISATION |
|---|---|
| The relevant internal drainage board | Swaffam Internal Drainage Board |
| | Littleport and Downham Internal Drainage Board |
| | Haddenham Level Drainage Commissioners |
| | Middle Fen and Mere Internal Drainage Board |
| | Old West Internal Drainage Board |
| | Waterbeach Level Internal Drainage Board |
| | Cawdle Fen Internal Drainage Board |
| The Canal and River Trust | Canal and River Trust |
| The relevant Highways Authority | Cambridgeshire County Council |
| | National Highways |
| The Civil Aviation Authority | Civil Aviation Authority |
| The Health and Safety Executive | Health and Safety Executive |
| United Kingdom Health Security Agency, an executive agency of the Department of Health and Social Care | United Kingdom Health Security Agency |
| NHS England | NHS England |
| The Crown Estate Commissioners | Crown Estate |
| The relevant police authority | Essex Police and Crime Comissioner |
| | Cambridgeshire Police and Crime Comissioner |
| | Suffolk Police and Crime Comissioner |
| The relevant ambulance service | East of England Ambulance Service |
| | Essex Fire and Rescue Service |

| SCHEDULE 1 DESCRIPTION | ORGANISATION |
|---|---|
| The relevant fire and rescue authority | Cambridgeshire Fire and Rescue Service |
| | Suffolk Fire and Rescue Service |

## TABLE A2: RELEVANT STATUTORY UNDERTAKERS

'Statutory Undertaker' is defined in the APFP Regulations (as amended) as having the same meaning as in Section 127 of the Planning Act 2008 (PA2008)

| STATUTORY UNDERTAKER | ORGANISATION |
|---|---|
| The relevant Integrated Care Board | NHS Hertfordshire and West Essex Integrated Care Board |
| | NHS Mid and South Essex Integrated Care Board |
| | NHS Cambridgeshire and Peterborough Integrated Care Board |
| | NHS Suffolk and North East Essex Integrated Care Board |
| NHS England | NHS England |
| The relevant NHS Trust | East of England Ambulance Service NHS Trust |
| Railways | Network Rail Infrastructure Ltd |
| | National Highways Historical Railways Estate |
| Canal Or Inland Navigation Authorities | Canal and River Trust |
| | Environment Agency |
| Civil Aviation Authority | Civil Aviation Authority |
| Licence Holder (Chapter 1 Of Part 1 Of Transport Act 2000) | NATS En-Route Safeguarding |
| Universal Service Provider | Royal Mail Group |

| STATUTORY UNDERTAKER | ORGANISATION |
|---|---|
| Homes and Communities Agency | Homes England |
| The relevant Environment Agency | Environment Agency |
| The relevant water and sewage undertaker | Cambridge Water |
| The relevant public gas transporter | Cadent Gas Limited |
| | Northern Gas Networks Limited |
| | Scotland Gas Networks Plc |
| | Southern Gas Networks Plc |
| | CNG Services Ltd |
| | Energy Assets Pipelines Limited |
| | ES Pipelines Ltd |
| | ESP Connections Ltd |
| | ESP Networks Ltd |
| | ESP Pipelines Ltd |
| | Fulcrum Pipelines Limited |
| | GTC Pipelines Limited |
| | Harlaxton Gas Networks Limited |
| | Independent Pipelines Limited |
| | Indigo Pipelines Limited |
| | Inovyn Enterprises Ltd |
| | Last Mile Gas Ltd |
| | Leep Gas Networks Limited |
| | Mua Gas Limited |

| STATUTORY UNDERTAKER | ORGANISATION |
|---|---|
| | Quadrant Pipelines Limited |
| | Stark Works |
| | National Gas |
| The relevant electricity generator with CPO Powers | SMS Energy Services Limited |
| | Sunnica Limited |
| The relevant electricity distributor with CPO Powers | South Eastern Power Networks Plc |
| | Advanced Electricity Networks Ltd |
| | Aidien Ltd |
| | Aurora Utilities Ltd |
| | Eclipse Power Network Limited |
| | Energy Assets Networks Limited |
| | ESP Electricity Limited |
| | Fulcrum Electricity Assets Limited |
| | Green Generation Energy Networks Cymru Ltd |
| | Harlaxton Energy Networks Limited |
| | Independent Distribution Connection Specialists Ltd |
| | Independent Power Networks Limited |
| | Indigo Power Limited |
| | Last Mile Electricity Ltd |
| | Leep Electricity Networks Limited |
| | Mua Electricity Limited |
| | Optimal Power Networks Limited |
| | Stark Infra-Electricity Ltd |
| | The Electricity Network Company Limited |

| STATUTORY UNDERTAKER | ORGANISATION |
|---|---|
| | UK Power Distribution Limited |
| | Utility Assets Limited |
| | Vattenfall Networks Limited |
| | UK Power Networks Limited |
| The relevant electricity transmitter with CPO Powers | National Grid Electricity Transmission Plc |
| | National Grid Electricity System Operation Limited |

**TABLE A3: LOCAL AUTHORITIES AS DEFINED IN SECTION 43(3) OF THE PA2008**

| LOCAL AUTHORITY |
|---|
| Fenland District Council |
| South Cambridgeshire District Council |
| East Cambridgeshire District Council |
| Cambridge City Council |
| West Suffolk District Council |
| Braintree District Council |
| Uttlesford District Council |
| Central Bedfordshire Council |
| North Hertfordshire District Council |
| Borough Council of King's Lynn and West Norfolk |
| North Northamptonshire Council |
| Central Bedfordshire Council |
| Bedford Borough Council |
| Peterborough City Council |

| LOCAL AUTHORITY |
| --- |
| Essex County Council |
| Suffolk County Council |
| Cambridgeshire County Council |
| Norfolk County Council |
| Lincolnshire County Council |
| Hertfordshire County Council |

**TABLE A6:: NON-PRESCRIBED CONSULTATION BODIES**

| ORGANISATION |
| --- |
| Cambridgeshire and Peterborough Combined Authority |

# APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

| CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE: |
|---|
| Balsham Parish Council |
| Borough Council of King's Lynn and West Norfolk |
| Braintree District Council |
| Burrough Green Parish Council |
| Burwell Parish Council |
| Cambridgeshire County Council |
| Canal and River Trust |
| Carlton cum Willingham Parish Council |
| Central Bedfordshire Council |
| Dullingham Parish Council |
| East Cambridgeshire District Council |
| Environment Agency |
| Essex Fire and Rescue Service |
| Fenland District Council |
| Forestry Commission |
| Great Thurlow Parish Council |
| Great Wilbraham Parish Council |
| Health and Safety Executive |
| Horseheath Parish Council |
| Linton Parish Council |
| Little Abington Parish Council |
| Lode Parish Council |

| |
|---|
| Ministry of Defence |
| National Gas |
| National Grid Electricity Transmission Plc |
| National Highways |
| NATS En-Route Safeguarding |
| Natural England |
| North Hertfordshire District Council |
| Peterborough City Council |
| Reach Parish Council |
| South Cambridgeshire District Council |
| Stow Cum Quay Parish Council |
| Suffolk Police and Crime Commissioner |
| Swaffham Bulbeck Parish Council |
| UK Health Security Agency |
| West Suffolk District Council |
| West Wickham Parish Council |
| West Wratting Parish Council |
| Weston Colville Parish Council |
| Withersfield Parish Council |

# *BALSHAM PARISH COUNCIL*

Mrs T Coston (Clerk to the Council)

[redacted]

E-mail: [redacted]

☎ [redacted]

Mobile: [redacted]


Deb Glassop
EIA Advisor, on behalf of the Secretary of State
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN

13th January, 2025

Dear Ms Glassop,

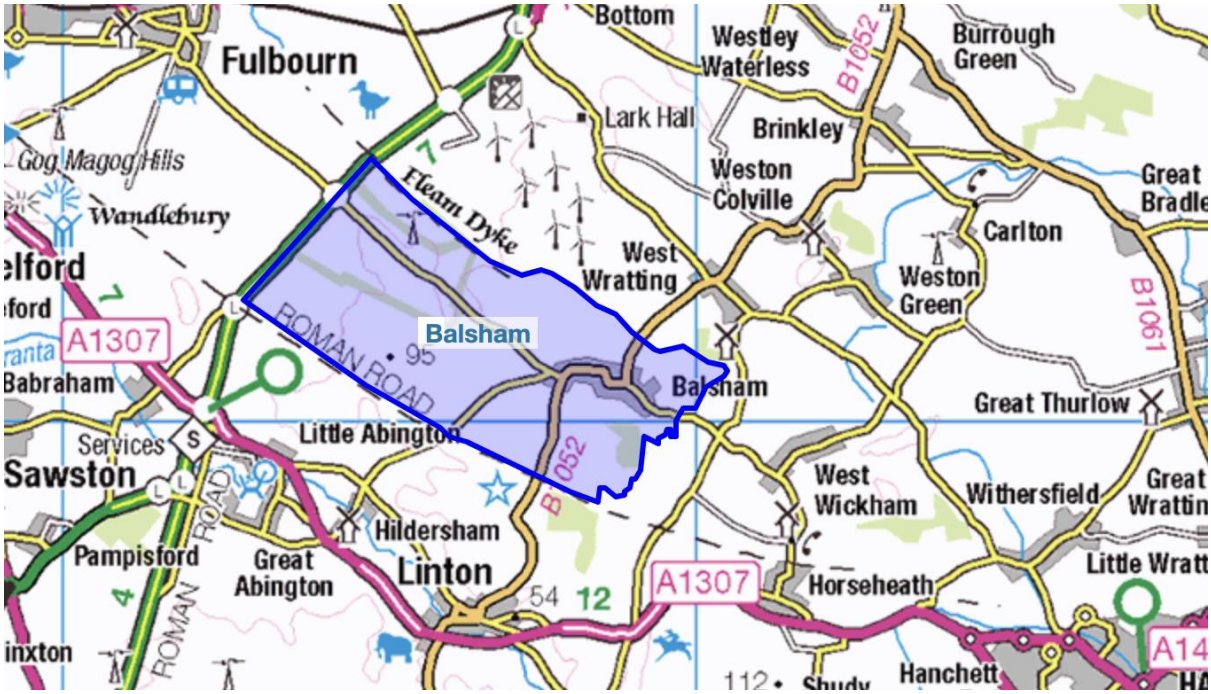
**Application by Kingsway Solar Farm Ltd – Scoping Consultation**

Balsham Parish Council has read and reviewed Kingsway Solar's Environmental Impact Analysis Scoping Report and has had input from concerned residents.

**About Balsham**

Balsham is a parish located southeast of Cambridge, covering 1831 hectares of undulating farmland. The terrain rises from the A11 in the north to the village centre in the south. Roman roads form the west and south boundaries, Fleam Dyke lies to the northwest, and one of the Icknield Way tracks marks the northern edge. The village itself is situated along a single main road, with the church occupying the highest point of the area. The surrounding landscape includes farmland used primarily for arable crops such as wheat, barley, sugar beet, and rapeseed, with some pasture for sheep and cattle. Known as "Balesham" in the Domesday Book, it blends 16th-century cottages with modern homes, expanding significantly since the 1960s.

With about 1,600 residents, Balsham features a primary school, post office, café, two pubs (the Bell and the Black Bull), and arable farms growing wheat, barley, sugar beet, and rapeseed. Its active community supports clubs, sports teams and local trades.




[Balsham Parish Map]

**Concerns about the EIA scoping report**

The scoping EIA report for the Kingsway solar farm contains several difficulties and uncertainties. Key design details, such as the layout and positioning of solar panels and batteries, remain undecided, with the applicant using the 'Rochdale Envelope' approach to delay final decisions until after the development consent order (DCO) is issued. There is also ambiguity regarding the overlap of land use with Wadlow Wind Farm (area B), raising concerns about potential impacts on Fleam Dyke.

The report seems rushed, with errors in references, outdated sections, and inconsistencies reflecting changes in the scheme. Some content appears copied from other solar farm documents, which undermines confidence in its accuracy.

**Location of solar farm**

Areas A and B were initially selected for their proximity to grid infrastructure, but the plan now includes a 15 km pylon link to an unbuilt substation, with the justification shifting to landowner agreements (and inclusion of Area C). These areas, situated in a rolling rural landscape near historical features like Fleam Dyke, make it difficult to minimize environmental and visual impacts (see Landscape and visual amenity and Cultural heritage). The underlying chalk aquifer raises safety concerns about battery storage (see BESS safety). The site selection process seems to overlook local planning policies such as the Local Plan.

**BESS safety**
The scoping EIA report proposes excluding major accidents and disasters, including Battery Energy Storage System (BESS) fires, from further assessment, despite acknowledging significant fire risks. This dismissal is inadequately justified, ignoring the severe, potentially catastrophic impacts of BESS fires, such as toxic hydrogen fluoride emissions and contamination of firewater, which is particularly concerning over a principal chalk aquifer supplying regional drinking water.

***Action required:*** A more rigorous evaluation of risks, detailed mitigation plans, and justification for the BESS location near residences and critical water sources must be included in the EIA and ES.

**Land use**
The scoping EIA report claims that 45.9% of areas A and B consist of grade 3a or better agricultural land, classifying it as Best and Most Versatile (BMV), despite previous classifications identifying all the land as BMV. This downgrading, based on an unreferenced Agricultural Land Classification (ALC) survey from spring 2024, raises doubts about its validity, especially given similar inaccuracies in other projects.

Planning rules usually suggest avoiding BMV land unless no other options are available. While solar farms offer clean energy, they take away land that could be used for farming. It's important to carefully consider the impacts on the environment and community when using BMV land for solar projects.

The importance of protecting BMV land is minimized, with the argument that policy permits its use under certain conditions. However, the scheme acknowledges significant negative impacts on BMV land throughout all stages of development. The reasoning for choosing BMV land over less valuable alternatives near a grid connection is weak and lacks a thorough examination of other options.

***Action required:*** Greater transparency and independent validation of the survey methodology are essential, along with a more compelling case to demonstrate that non-BMV land was not a feasible alternative.

**Hydrology**
No account has been taken of the effect of solar panels on the proportion of precipitation which soaks into the chalk aquifer. Without design and mitigation, there will be some loss to the aquifer, which is serious, as firstly it provides 99% of our drinking water, and secondly, it is the source of Cambridgeshire's rare and important chalk streams. Even a small percentage effect could matter with the very large area of panels proposed. See attached document 'Hydrology Advice'. The first figure in that shows that Area A and part of Area B are within the 'Fleam Dyke Catchment Area'. In section 5.2 the EIA Scoping report scopes "water" out, but it only considers "the potential effects associated with the Scheme on flood risk and surface water drainage".

***Action required:*** Full assessment of ground-mounted solar PV on chalk aquifer to be scoped in.

**Landscape and visual amenity**
Section 6.2 of the scoping EIA addresses the scheme's impact on landscape and visual amenity. The scale and geographical extent of the proposed development are expected to result in **significant adverse landscape effects and prolonged visual impacts**. These effects will be most noticeable to nearby residents of villages like Balsham, although the report primarily highlights the impacts associated with area C. The impacts in areas A and B should not be overlooked, given their proximity to sensitive rural settings and historical features.

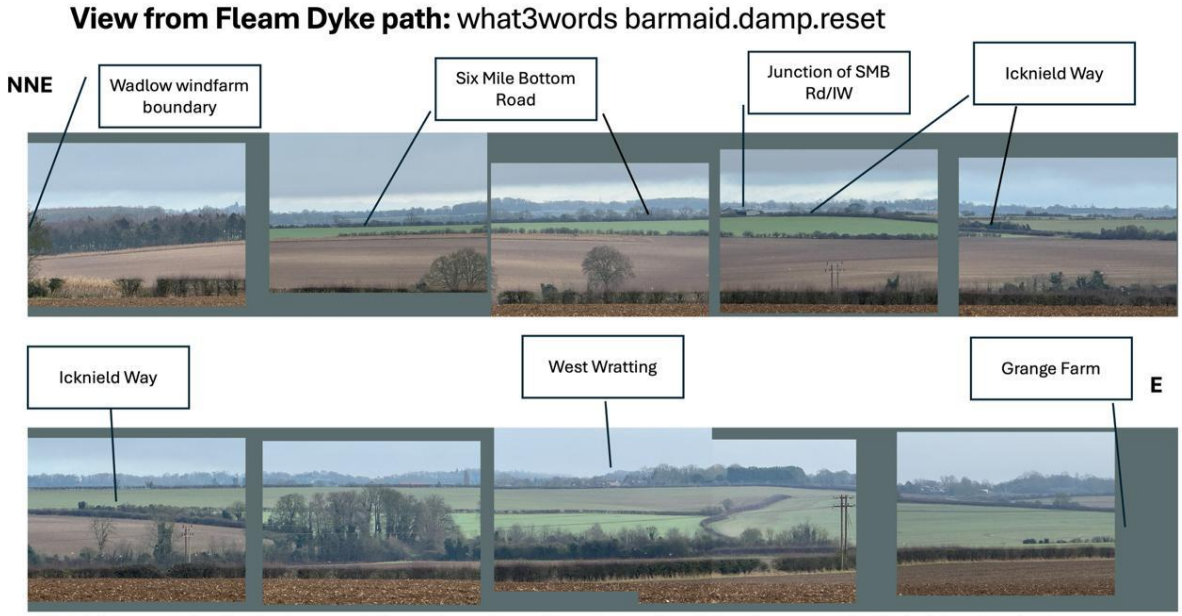
**2.7.26 Substations:** At both 400 kV and 132 kV, it is anticipated that the required **footprint for each individual on-site substation would be approximately 9,000 m2**.

***Action required****:* Further refinement is required through the iterative design process to confirm the parameters and location of on-site substation(s) as the design of the Scheme

Section 6 describes the landscape as having rolling, gently undulating hills and clay woodlands with "long distance and open views" across the area. The elevated land in the middle of area B, with its 13 wind turbines, is visible from many miles away, particularly along the Fleam Dyke and Icknield Way footpath. Co-locating the solar farm in this area, as suggested in the plans, would make the new infrastructure highly visible.

*Photo: from the Fleam Dyke towards West Wratting showing the wind turbines on area B*

Balsham residents frequently use the Fleam Dyke and Icknield Way (Fox Road) in Area B, as well as the Roman Road in Area A near Balsham. Both are popular routes for walking, cycling, and other recreational activities. They hold historical significance and local value, contributing to the area's character and providing an important connection to the surrounding landscape. The solar farm will have a significant impact on regular users of these routes.



All fields beyond the first hedgerow within the boundary of Area B. Panels will be almost double the height of the hedgerows

This is a photo montage of a view of Area B from the Fleam Dyke path showing that screening of this area will be impossible.

The potential of a new construction road discussed in the 'Traffic and Transport' (Page 7) would run through the middle of this picture. Whatever Kingsway does to land area B, and the way they construct it, the impact on the village will be huge. The scoping EIA document does not reflect this or addresses the correct data analysis to assess it.

***Action required:*** Detail any access roads and proposed routes.

We believe the impact on residents extends beyond just how the solar farm affects their views. People in rural areas often have a deeper connection to the land they live on compared to urban dwellers. The introduction of large, industrial structures in the green spaces they cherish will cause significant distress and negatively affect their wellbeing.

***Action required:*** More details on visual screening and other mitigation measures are needed. This includes the height of the solar panels (with a maximum height of 3.5 metres) will be taller than existing hedgerows and would be difficult to screen. When considering the visual

impact of the solar farm, it is crucial to include the existing 13 wind turbines in area B and the pylons connecting them to the Burwell substation. Failing to consider these developments would overlook key factors already impacting the landscape.

**Cultural heritage**
Paragraph 2.4.24 of the scoping EIA report states, "there are no listed buildings within the developable areas," which is correct for areas A and B (but not C).

Designated and non-designated heritage assets are less common in areas A and B of the scheme than C, but these areas, along with the grid connection corridor, contain the scheduled monument Fleam Dyke and remnants of sites that were part of a prehistoric funerary landscape (especially area A).

The preservation of prehistoric funerary remnants during the construction of the solar farm is a critical concern. These archaeological features hold significant historical value. Disturbing or damaging them could result in the loss of valuable cultural heritage. It is essential that thorough archaeological surveys are conducted in advance of construction, and any construction activities near these sites must be carefully managed to ensure their preservation.

The impact of a solar farm on Fleam Dyke, a scheduled monument, requires careful management to protect its cultural, archaeological, and environmental significance. Any disturbance could damage its archaeological integrity. Fleam Dyke is an important feature in the landscape, contributing to its sense of place, so visual or physical changes could diminish its value as a historical landmark. This is especially relevant for any connection corridors or cable routes, such as those between areas A and B, as mentioned in section 6.3.9. (See attached photographs to highlight visual impact on historical footpaths in land area B).

***Action required**:* In addition to the groups and organizations already mentioned, other interested parties that should be consulted include Cambridge Past, Present and Future (CPPF) and the Fleam Dyke and Roman Road Association (FDRRA). Consultations should include local historians, community groups, and projects like the Balsham Map Project.

**Traffic and transport**
Chapter 2 outlines the traffic plan, stating that "construction access will be via the four junctions along the A11, then onto the local road network; Six Mile Bottom Road, London Road, Balsham Road, and an unnamed farm access via Worsted Lodge" (2.7.33). These routes are shown on a low-quality map (Figure 2.2, page 37). Since areas A and B are close to the A11, it may be possible to limit use of rural roads by utilizing existing tracks in the wind farm complex and building new access roads within the scheme boundary. However, there is uncertainty about access to areas B and C via Balsham Road, which could lead to increased traffic flows through the village of Balsham. Additionally, the traffic baseline data is inadequate, and the data collection methodology seems unsuitable for capturing the seasonal nature of local traffic and takes no account of the projected anaerobic digester at Streetly Hall (see attached file), which will add significant traffic flows through Balsham.

The A-B area interconnection runs through land outside of the land agreements and across the Fleam Dyke. This should be included within the scope of the EIA.

*Specific comments on Section 6.7*

6.7.2
Phasing of construction work is not yet determined, and depot sites are not yet fixed. Therefore, traffic volumes for each route not yet identified, and none are indicated. There seems to be a possibility that these may only be determined post-EIA, and if so, how will this be included in the application to the inspectorate?

6.7.3
There appear to be no DfT count points on the routes into Balsham, which means no baseline data is available for traffic through Balsham. Given that Balsham Road is identified as a major access road (via J2 on Fig 2.2) this seems to be a major omission. Note this road has high volumes of traffic at peak times.

6.7.4
The proposals use the term 'may be required' where data is poor. This should be revised to 'will be required'. There is a statement that collected data will be used in the assessment of annual flows. However, there is much seasonal variation in local agricultural traffic, and neutral 24-hour data cannot be extrapolated to annual traffic flows. Sampling methodologies need to take account of this. It is noted that there is no indication at this stage of construction traffic volumes, which will only be known post-design. The EIA will have to take the full design conditions into account survey.

6.7.5
The Harcamlow and Icknield ways are acknowledged as potential constraints to construction access. The nature of these constraints and plans to address them need to be made public.

The configuration classification of the proposed road links is 'not definitive'. One might expect a more detailed assessment of the routes at the stage. It is not stated what additional work will be required to firm up this data.

6.7.8
The list of receptors does not include any road within Balsham (e.g. Fox Road or Balsham High Street). Does this mean that they are absolutely excluded from construction access traffic? This would suggest a need for new access roads between Balsham Road and areas A and B. There is no mention of this, and at least one scenario (access via Balsham or new access road) would appear to be necessary, unless area B will be accessed via Six Mile Bottom Road. This needs clarification.

6.7.10 Opportunities for enhancing the environment
This refers back to 6.2.10, which states that a plan will be produced. This seems like a wholly inadequate provision.

6.7.12
No data is given on expected traffic flows, 'but will be confirmed prior to assessment'. At what point does this confirmation take place and when will it be published? (see comment on 6.7.2).

While area A may be accessed via Worsted Lodge, area B has no direct touch points with the A11. Area B could potentially be accessed via Six Mile Bottom Road/London Road. However, Balsham/Cambridge Road is a named receptor, as is the B1052 (6.7.8). These are probably most suited to HGV traffic. It is not explicit that Balsham High Street will become a main access route and should be a named receptor.

West Wratting access via Honey Hill is currently possible only via Balsham. This route may also be subject to new traffic flows for the anaerobic digestor at Streetly End by the time construction starts. This will have huge impacts on Balsham residents, especially those living on the main road.

In addition, area B is some distance from Balsham Road, but there is no mention of any new access roads to area B to avoid high levels of traffic passing through the village. The impact of these potential new roads on farmland outside of the scoped area B should be assessed. It may be that construction access to area B could be entirely via Six Mile Bottom Road/London Road, with new construction roads built through the construction site (possibly using the windfarm access roads) right through to exit onto Honey Hill on the B1052. This could potentially bypass Balsham altogether but would have a highly visible new road across the south facing hillside of area B, with heavy traffic volumes during construction. If this is to be the plan, then it raises the question why Balsham Road is named as a receptor, if it not to carry traffic through Balsham village.

<u>Balsham Road/Cambridge Road</u> – Balsham High Street has some properties with no off-road parking resulting in parked vehicles on highway restricting road width to single lane.

<u>6.7.8 Receptors/matters to be scoped into further assessment</u> – does not list Fox Road/Hildersham Road indicated in Figure 2.2 as potential connection route between sites A & B - see above. Also does not specify Balsham High Street separately.

The above places extreme pressure on the village of Balsham as it may service construction traffic to areas B and C.

Figure 2.2 Potential construction site access routes and points
It appears that they may be proposing to use Hildersham Road and Fox Road as routes between Area A and Area B. The sight lines from both junctions are limited, particularly from Fox Road. Fox Road is not suitable for heavy vehicles and parts of it are designate footpaths – e.g Harcamlow Way and Icknield Way.
It looks like they are planning to monitor use of the footpaths this year to see if it can be listed in a lower category for assessment on the basis of usage.

In addition, if Fox Road in Balsham is under consideration for any construction access then this should also be a named receptor.

**Biodiversity, habitats and wildlife**
Section 6.1 of the scoping EIA report addresses the impact of the scheme on biodiversity and wildlife. While surveys have been completed for areas A and B, they have not yet been conducted for area C or the connection corridors. Area C has a distinctly different landscape character compared to areas A and B, being wooded clay land rather than chalk hills. As a result, the ecology and habitats are likely to differ significantly and need separate consideration.

Although Fleam Dyke (SSSI and Scheduled Monument) is not designated as a Special Area of Conservation (SAC), we believe a Habitats Regulations Assessment (HRA) should be carried out due to its proximity to areas A and B and the presence of rare species-rich chalk scrub and grassland habitat, which is uncommon in south, central, and eastern England (page 95).

In 6.1.10 (summary of scoping), several receptors have been scoped out of the development areas and grid connection corridors.

***Action required:*** Given their ecological importance and potential for biodiversity enhancement, habitats such as calcareous grassland, priority habitats like hedgerows, rivers, streams, grazing marsh, as well as arable fields and ditches, should not be excluded. These habitats support rare species, serve as wildlife corridors, and contribute significantly to overall biodiversity.

**The assumption that all farmland has low biodiversity value is overly simplistic**

We would like to note that barn owls are known to nest and hunt in area B (particularly at ///mouse.snuck.humidity), in addition to area A, as mentioned on page 151 of the scoping EIA. Furthermore, area B is home to a significant population of brown hares, which are listed in the UK Biodiversity Action Plan (BAP) due to their long-term decline. However, brown hares are grouped with other small mammals like hedgehogs, harvest mice, and polecats, and are scoped out as a biodiversity receptor for areas A, B, and C. This is not acceptable, as brown hares warrant specific consideration due to their conservation status.

***Action required**:* Inclusion of brown hares as a scoped in biodiversity receptor.

In addition, b**ats** are to be scoped in as important references show an apparent adverse effect of solar panels on bats. The reasons are not entirely clear, but one (quite plausible) proposal is that the surfaces are sufficiently similar to water for the bats to try drinking from them. However, evidence comes from studies on much, much smaller developments than this proposal, and the effects could therefore be much more significant. See attached document "Comments on EIA Scoping Report - Bats". One reason why I am pushing this with Balsham is that the caves by the sewage works are an important winter roost. I got this comment from the Cambridge Bat Group: *"One very important site is the Balsham caves, which are visited and surveyed each winter by the bat group, with records as you can see going back many years. These bats (mostly Natterer's, Daubenton's and Brown Long-eared) will forage over a wide area around here. Other important records include Barbastelle, which is a rare bat, which likely has several roost sites in this area as indicated by the records."*

Finally, we believe that most research on the effects of solar farms on biodiversity and wildlife has focused on much smaller-scale projects. There is inherent uncertainty in applying these findings to a development of this size.

***Action required:*** We ask that any biodiversity net gains be supported by robust evidence and not extrapolated from research based on small-scale solar farms.

**Other concerns**

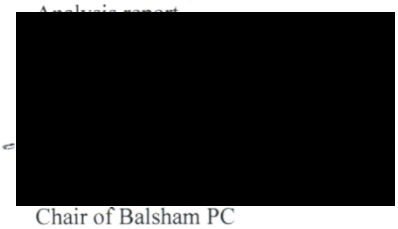
A specific concern is the proposed construction schedule of 07:00 to 19:00 Monday to Friday, and 07:00 to 13:00 on Saturdays, with construction staff arriving before 07:00 and leaving after 19:00 on weekdays. We consider this schedule unacceptable, as it could cause significant disruption to residential amenity.

***Action required:*** To protect residents, we recommend limiting construction hours to 08:00-18:00 Monday to Friday, 08:00-13:00 on Saturdays, with no work on Sundays, public holidays, or bank holidays.

Section 6.8.9 suggests that private properties and housing be scoped out of further assessment, citing the claim that "no significant effects are expected in relation to private property and housing." We challenge this assertion, based on studies showing the impact of other solar farms on property prices and the experiences of those currently trying to sell their homes.

***Action required**:* This socio-economic impact should be included in the EIA, with the applicant required to explain how they plan to mitigate such effects.

The Parish Council believe that in its current form, the Scoping Report is inadequate and does not contain the information required to produce an Environmental Statement or an Environmental Impact Analysis. The issues raised above should be included in the Scoping Analysis report.



Chair of Balsham PC

Summary Action List:

**BESS Safety:**
***Action required:*** A more rigorous evaluation of risks, detailed mitigation plans, and justification for the BESS location near residences and critical water sources must be included in the EIA and ES.

**Hydrology:**
***Action required:*** Full assessment of ground-mounted solar PV on chalk aquifer to be scoped in.

**Landscape and Visual Amenity**
***Action required****:* Further refinement is required through the iterative design process to confirm the parameters and location of on-site substation(s) as the design of the Scheme

***Action required*****:** Detail any access roads and proposed routes.

***Action required:*** More details on visual screening and other mitigation measures are needed. This includes the height of the solar panels (with a maximum height of 3.5 metres) will be taller than existing hedgerows and would be difficult to screen. When considering the visual impact of the solar farm, it is crucial to include the existing 13 wind turbines in area B and the pylons connecting them to the Burwell substation. Failing to consider these developments would overlook key factors already impacting the landscape.

**Cultural Heritage**
***Action required****:* In addition to the groups and organizations already mentioned, other interested parties that should be consulted include Cambridge Past, Present and Future (CPPF) and the Fleam Dyke and Roman Road Association (FDRRA). Consultations should include local historians, community groups, and projects like the Balsham Map Project.

**Biodiversity, habitats and wildlife**
***Action required:*** Given their ecological importance and potential for biodiversity enhancement, habitats such as calcareous grassland, priority habitats like hedgerows, rivers, streams, grazing marsh, as well as arable fields and ditches, should not be excluded. These habitats support rare species, serve as wildlife corridors, and contribute significantly to overall biodiversity.

***Action required:*** Inclusion of brown hares as a scoped in biodiversity receptor.

***Action required****:* We ask that any biodiversity net gains be supported by robust evidence and not extrapolated from research based on small-scale solar farms.

**Other concerns:**

***Action required:*** To protect residents, we recommend limiting construction hours to 08:00-18:00 Monday to Friday, 08:00-13:00 on Saturdays, with no work on Sundays, public holidays, or bank holidays.

***Action required****:* This socio-economic impact should be included in the EIA, with the applicant required to explain how they plan to mitigate such effects.

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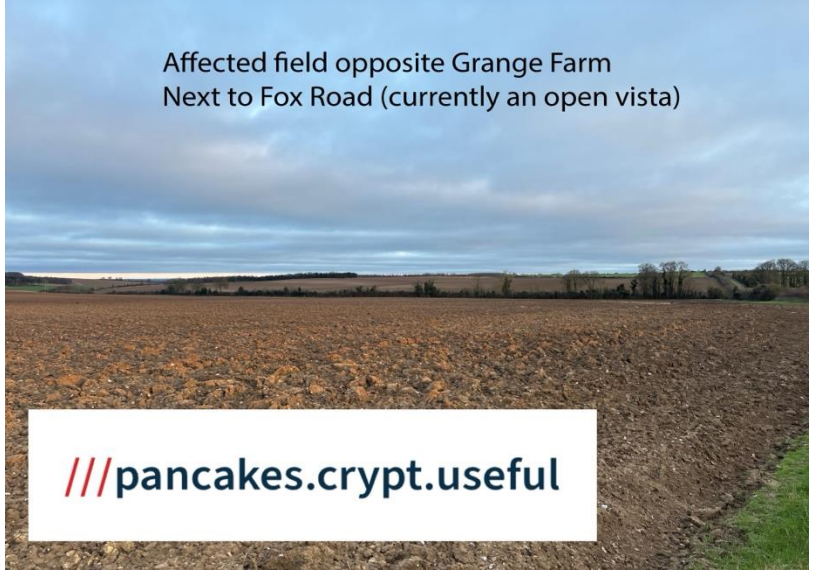
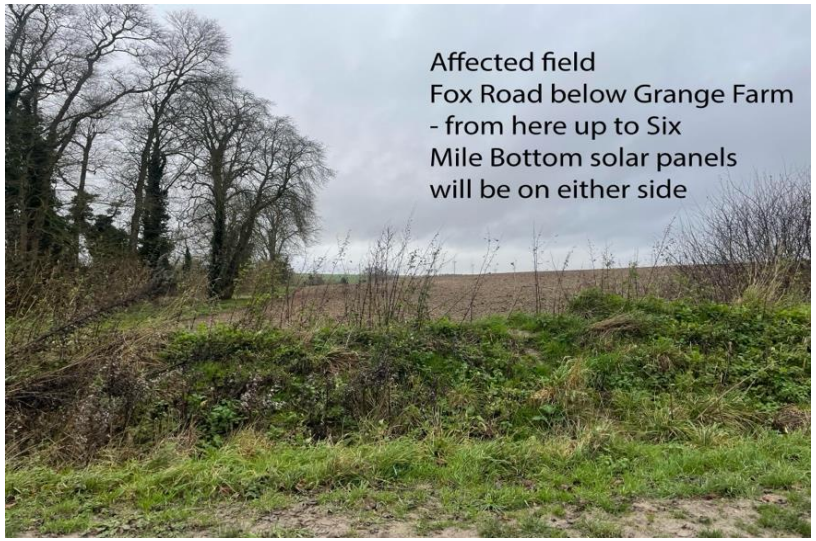
***Attachments:***
Hydrology Advice
Notes of Streetly Hall Anaerobic Digester
Impacted views for Balsham

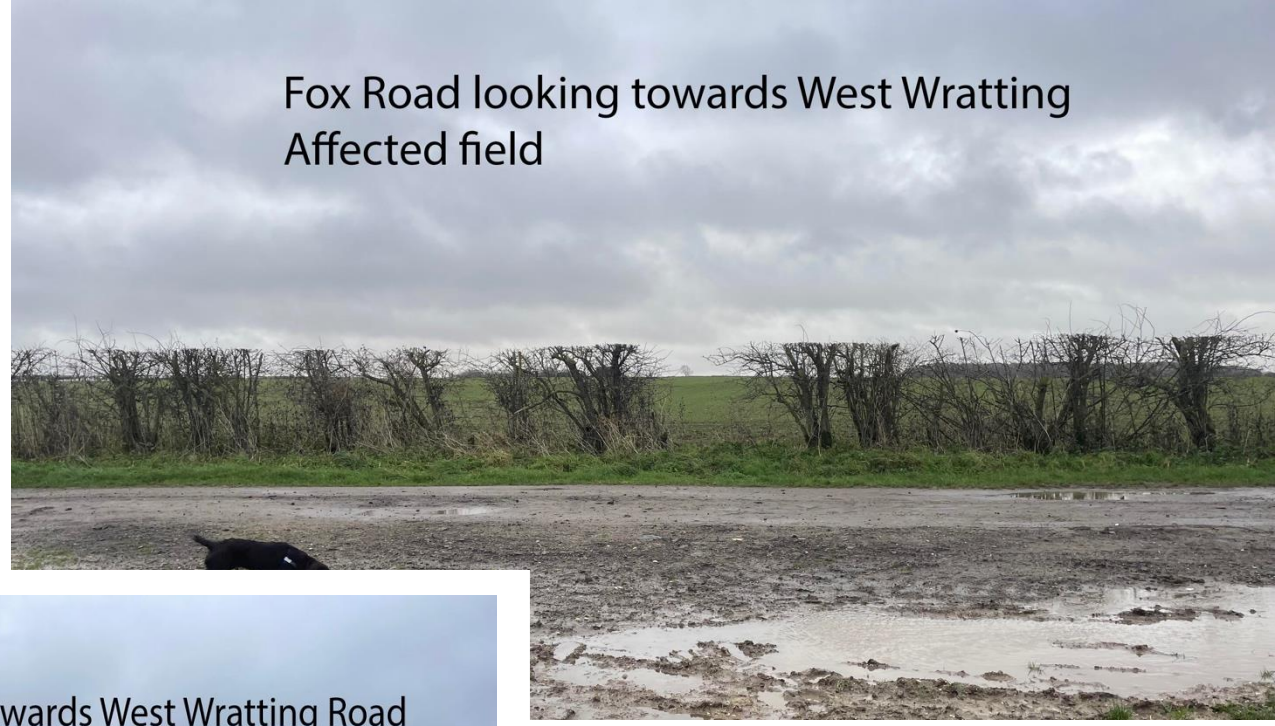


Walking up the Icknield Way (Fox Road) towards Six Mile Bottom Road from Fleam Dyke (Area B)



Left view (west) and right (east) towards the bridleway

Looking towards the wind farm from
Fox Road - all potential affected fields



Fox Road looking towards West Wratting
Affected field

Fox Road looking towards the wind farm
All potential affected fields

Looking east towards West Wratting Road
from Fox Road

Lorem Ipsum

View down Fox Road
Affected fields on right,
bottom and left

Views from Fleam Dyke and affected fields under the wind turbines

# **View from Fleam Dyke path:** what3words barmaid.damp.reset

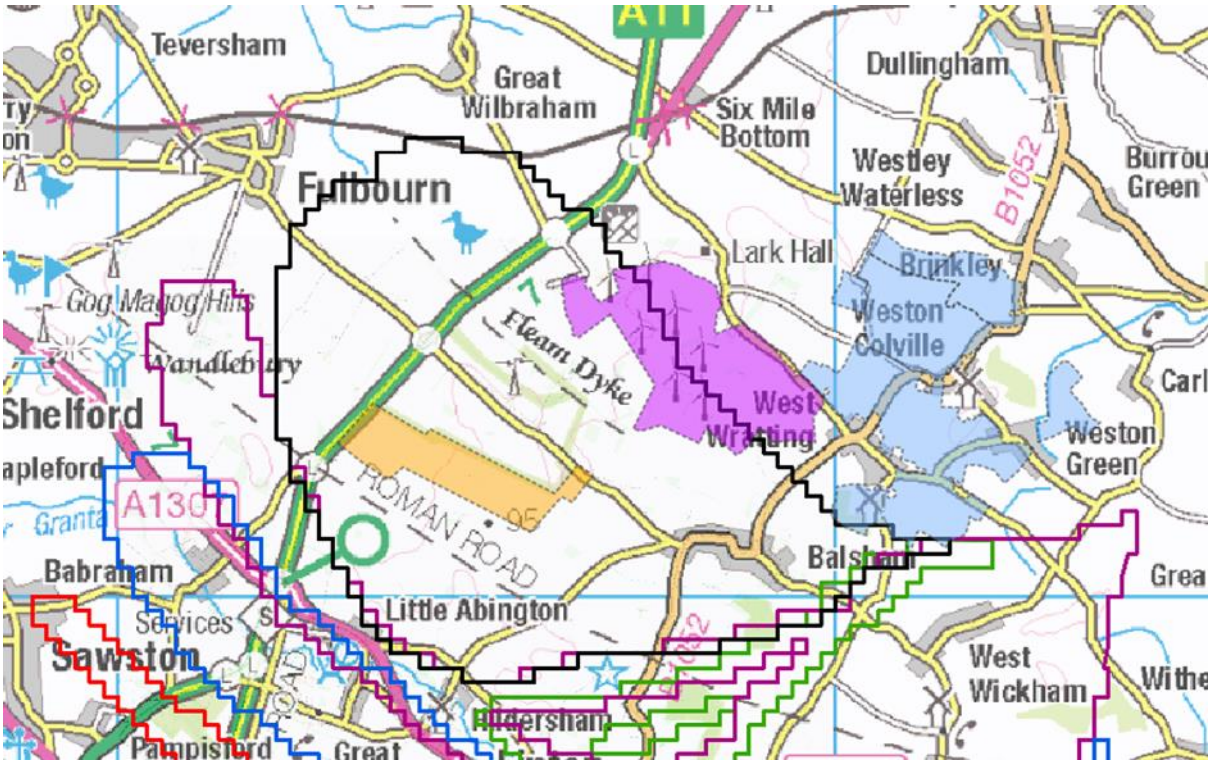
All fields beyond the first hedgerow within the boundary of Area B. Panels will be almost double the height of the hedgerows

# Advice received on hydrology, and in particular the chalk aquifer, 9/12/24

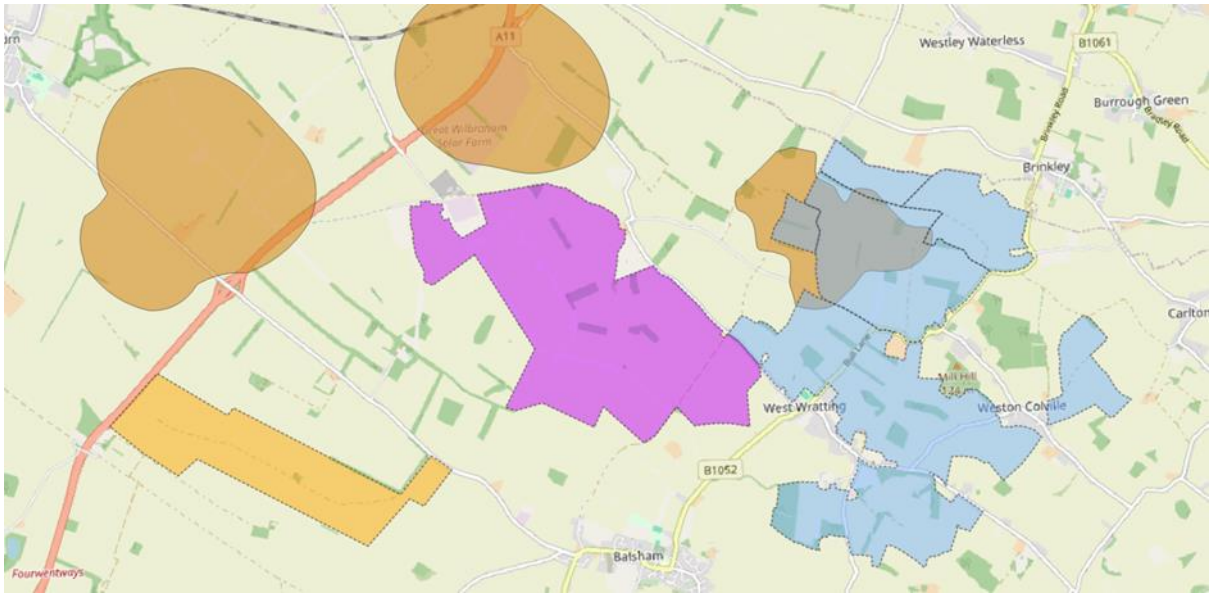
## Can you provide a reference which indicates what area is supplied by water from the chalk aquifer?

## Is there information on what proportion of water comes from the chalk aquifer?

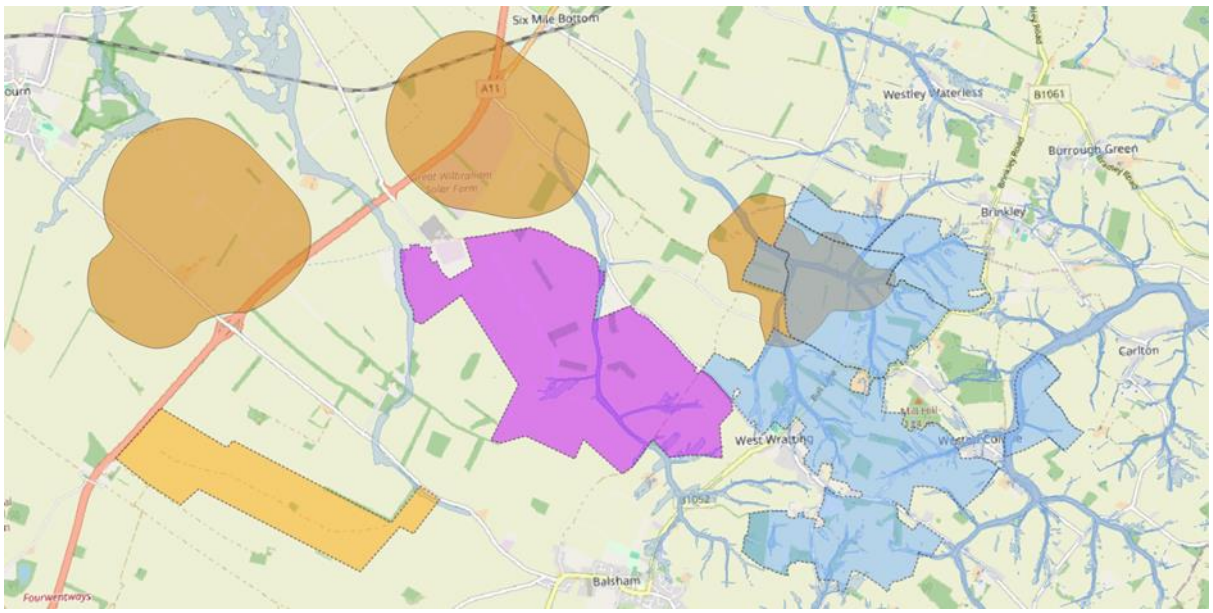
- "The Chalk" is a very large aquifer that runs under the proposed land parcels Principal aquifers in England and Wales | Aquifer, shale and clay maps | Aquifers and shales | Groundwater | Our research | British Geological Survey (BGS)
- Water companies in South East England where groundwater contributes > 75% of total public water supply are heavily reliant on the Chalk. Groundwater resources in the UK - British Geological Survey
- As much as 99% of the public supply provided by Cambridge Water is abstracted from the groundwater supplied by the aquifer. Addressing water scarcity in Greater Cambridge: update on government measures - GOV.UK
- The Cambridge Water groundwater catchments are provided in cambridge-sources-map.pdf.
- Sites A and B are inside the Fleam Dyke Catchment. It looks like Site C is outside the Cambridge Water source catchments. I have not been able to figure out whether Site C lands inside an Anglian Water source catchment instead.



- As shown on https://kingswaysolarfarm.co.uk/wp-content/uploads/2024/10/P663900_Phase_One_consultation_environmental_constraints_A3L.pdf, there is a ground water inner source protection zone overlapping Site C and there is one just to the north of Site B. My version of the map is below.




- Box 3.1 of the report at Baseline report series. 5, the Chalk of the North Downs, Kent and east Surrey - NERC Open Research Archive states that the Inner Source Protection Zone is designed to protect against toxic chemicals and waterborne disease.
- If you also look at the surface water maps, it's clear that the surface water from Site B and some of Site C passes through the inner source protection zones:




- According to Position Statement C1 in The Environment Agency's approach to groundwater protection, the EA will require nationally significant scheme to "protect groundwater".

- Position Statement C5 indicates that the EA would object to fluid filled cables passing through a Source Protection Zone. There is an interesting NRW review of a turbine, solar and battery scheme at CAS 245502 Y0L3.pdf (Chapter 10) which picks up a lot of concerns, including fluid filled cables.

> It should be confirmed if any proposed cables will be fluid filled. Should high voltage fluid filled cables be proposed, we refer to position statement C5 in The Environment Agency's approach to groundwater protection (publishing.service.gov.uk). The application must confirm whether cables are fluid filled and if so, they must be located above the water table.

- The NRW review at CAS 245502 Y0L3.pdf (Chapter 10) also points out that groundwater may need to be monitored and that this would make groundwater monitoring of the baseline conditions necessary for comparison.

> We may require identified groundwater features to be monitored during the proposed workings. We would therefore recommend that the survey be undertaken as soon as possible to enable the developer to carry out suitable baseline monitoring prior to the commencement of workings at the site. This will potentially have an effect on any GWDTEs present on the application area and dependent on groundwater/sub-surface run-off inputs.

- I understand that the groundwater team for a large infrastructure scheme we are working on has been informed by the Environment Agency that they will need 12 months of baseline groundwater monitoring for the planning application. This will pose a significant challenge due to the lead time for ground investigations and monitoring set up.
- I suspect that the Environment Agency and Cambridge Water will both be very keen to monitor and protect the groundwater and will require strong evidence for assessing impacts from the scheme in the application.

## Is there information on risks to the chalk aquifer, particularly from contamination? If there is a battery fire, very large volumes of contaminated water would result. This should be contained, but if not, how serious an issue would that be? For water courses and the aquifer?

- I have not managed to find any good material on the fire and pollution risks of the solar farm's battery energy storage system (BESS).
- There is a BBC news article at BESS: The charged debate over battery energy storage systems - BBC News which mentions one of the few UK examples of a BESS fire in Liverpool.
- To me, the incident report of the Liverpool fire at Significant Incident Report Final redacted.pdf suggests that the fire service did not have well-defined procedures for dealing with a battery fire. Their priority seems to have been to put the fire out without considering what happened to the run-off. The incident report notes that "run-off was low due to the

container involved being sited on a gravel base”.  It's not clear whether the run-off was contained or was allowed to drain through the gravel. The report does not state how much water was used, but I assume full containment to prevent any groundwater pollution would require some very large, lined sumps.

- A Freedom of Information Request at EIR-185-2024 Craig Hughes from June 2024 supports my suspicion that firefighting procedures are immature - “However, to limit the use of water and potential damage to the environment the SFRS are currently developing innovative solutions for dealing with fires involving Lithium-Ion battery fires.”

# Streetly Hall Anaerobic Biodigester

Note for attachment to Kingsway Solar Community Action minutes, 22 July 2024

https://planning.cambridgeshire.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=S0BB1JDYKNQ00

Application ref CCC/23/110/FUL

The feedstock locations are detailed in the planning documents, and there is a table in the Transport Statement (Table 3.1.5 'Transport Figures by Location (Annual)', reproduced below). From this I have calculated that 11% of the feedstock transports come from Grange Farm.

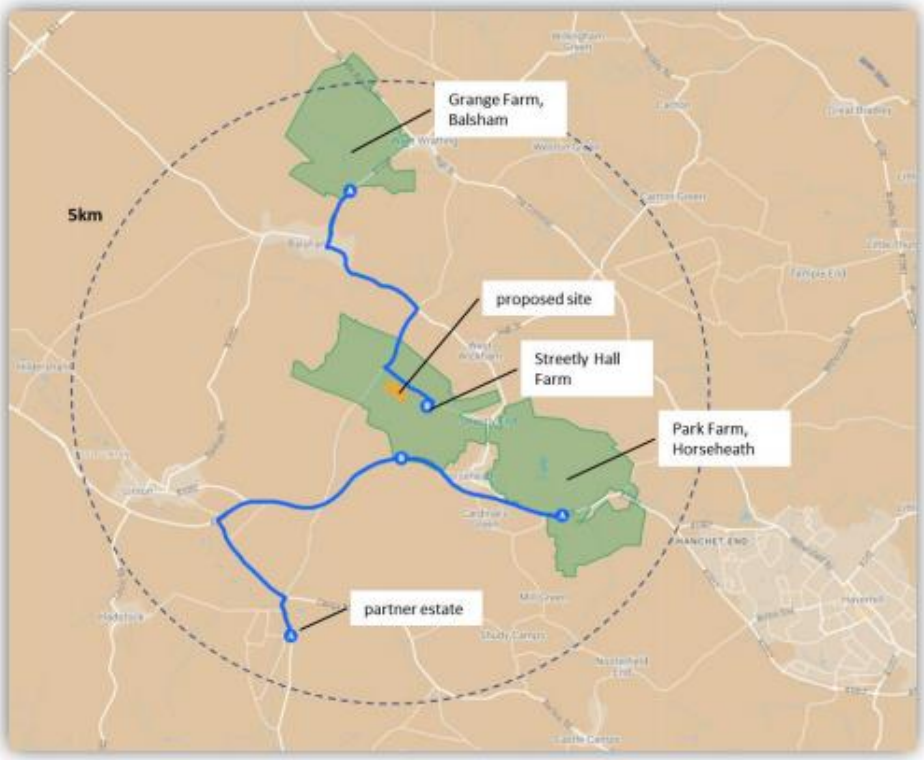



**Image 3.0** Feedstock locations

Material will be imported and exported to various locations including the Applicant's own landholding and partner farms identified on **Image 3.0** above. The below tables breakdown the anticipated number of loads to be imported from/exported to each of the locations annually and daily (on average).

| Transport Figures by Location (Annual) | | | | | |
|---|---|---|---|---|---|
| **Locations** | **Energy Crops** | **Straw** | **Digestate** | **Other** | **Total** |
| Streetly Hall Farm | 158 | 45 | 146 | 29 | 378 |
| Park Farm | 158 | 45 | 146 | 88 | 437 |
| Grange Farm | 321 | 34 | 157 | 59 | 570 |
| Partner Farms | 405 | 180 | 522 | 118 | 1,225 |
| Other Farms | 534 | 339 | 796 | 294 | 1,964 |
| Other agri waste sources | | | | 462 | 462 |
| Bio $CO_2$ to Humber | | | | 333 | 333 |
| **Total:** | **1,666** | **643** | **1,767** | **1,383** | **5,368** |

**Table 3.1.5** Annual movements by location

## Patten, Jack

**From:** Hannah Wood-Handy [redacted]
**Sent:** 19 December 2024 12:14
**To:** Kingsway Solar Farm
**Subject:** EN010165 - Kingsway Solar Farm - EIA Scoping Consultation and Notification

**Follow Up Flag:** Follow up
**Flag Status:** Flagged

> You don't often get email from [redacted]

Dear Sirs

The site is some significant distance from the administrative district of the Borough Council of King's Lynn and West Norfolk. On this basis, the Council offers no comments.

Yours faithfully

**Hannah Wood-Handy, Planning Control Manager – Environment & Planning**
Tel: 0[redacted]

Borough Council of King's Lynn & West Norfolk [redacted]

**********
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**Bottisham Parish Council**
41 Stow Road, Stow cum Quy, CB25 9AD **Tel:** [redacted]
clerk@bottisham-pc.gov.uk www.bottisham-pc.gov.uk
**Chairman**: Jon Ogborn **Vice Chairman**: Nadene Cundell **Clerk**: Sam Chambers-Turner

Ref: BPC/KSF/140125

14th January 2025

Dear Sirs

**REF : EN010165**

Firstly, let me thank you for the opportunity to comment on the Environmental Impact Scoping Report for the above development wish to receive a Development Consent Order.

The Parish Council wishes to raise awareness of this incredibly tight deadline to be able to respond to this application due to the Christmas break. Notification was received on 17th December 2024 and the closure date is 14th January 2025 with no opportunity to extend the deadline. We note that the Planning Inspectorate did make mention of this to the applicant advising against submission at that time, but this was not considered by the applicant. It is also noted that this has happened directly on the back of the public engagement events that have been held by the organisation.

As a Parish Council that may be affected by the pylon corridor, we wish to raise concerns over the proposals. We also wish to lend our support to the villages that are going to be largely encompassed by this development. As a locality is agreed that solar energy is important, however it is felt that the area is going to have all its landscape covered with solar panels, as there is already a large solar farm located at Burwell , another planned between Fen Ditton and Stow Cum Quy and now this development near Great Wilbraham, Six Mile Bottom and the West Wratting area, which already has solar panels covering a large area of its landscape. We therefore wish for the locality to be considered as a whole rather than specific parishes and we wish for the applicant to research any current proposals or previously granted applications when considering the locations of the sites for the panels. Consideration must be given to all of the localities areas of scheduled monuments, SSSI sites and listed buildings should be included within the scoping report for any area that either there is a panel site is located or on any land that the pylon corridor is to cross. Furthermore, it is also felt that the proposed pylon corridor is going to cause significant problems for the landscape as there is already a current line of pylons that run in a similar direction. If consideration is not given to visual appearance of the secondary line in conjunction with the current line this will further impact the visual landscape. The Parish Council are also wishing that consideration is given to the loss of visual landscape and of the implications of such dense areas of solar panels for residents including the financial loss. They also wish for consideration to be given to the physical impact of the panels such as glare to motorists, safety of the sites and the disruption due to the installation.

**Kind regards**

[redacted]

**Clerk to council**

**Our ref:** 24/02665/ODC
**Your Ref:** EN010165
**Direct Dial:** [redacted]
**Ask for:** Mathew Wilde
**Date:** 13.01.2025

Braintree District Council

**Development Management**
Causeway House Braintree
Essex CM7 9HB

Deb Glassop
The Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

Dear Sir/Madam

| | |
|---|---|
| **APPLICATION NO:** | 24/02665/ODC |
| **DESCRIPTION:** | Out of District Consultation from The Planning Inspectorate - Kingsway Solar Farm |
| **LOCATION:** | South Cambridgeshire District Council and East Cambridgeshire District Council |

Thank you for writing to Braintree District Council as a consultation body regarding the Kingsway Solar Farm NSIP scoping submission.

I can confirm that Braintree District Council do not wish to offer any comments to the Applicants scoping submission for the Kingsway Solar Farm.

We trust that the views of the relevant Host Authorities will be considered when deciding what matters should be scoped into the Environmental Impact Assessment.

Yours faithfully

[redacted]

Mathew Wilde MRTPI
Principal Planner
for Planning Development Manager

## Patten, Jack

**From:** clerk@burroughgreenparishcouncil.org.uk
**Sent:** 13 January 2025 12:54
**To:** Kingsway Solar Farm
**Subject:** Burrough Green Parish Council response

**Importance:** High

**Follow Up Flag:** Follow up
**Flag Status:** Flagged

The parish council understands the need for deployment of renewable power and gas and would generally be supportive of small scale local projects as these form an important part in allowing agricultural businesses to contribute to reducing emissions and diversify. The industrial scale project proposed by Kingsway raises concerns.

The scale of the project is out of content with the local and wider area.

Removal of such a large parcel of agricultural land from food production as well as adding barriers to local young people looking to get into the farming industry with further loss of local agricultural jobs.

Concerns over the environmental impact to the local area and its wildlife and flora.

Impacts of the construction of a large scale infrastructure project in a rural area in regards to traffic and road safety for local people.

The addition of new land into the scheme to bypass local planning regulations will limit the input from local council from parish up to county level. Part C of the project does not take into regard the proximity to villages, homes and local businesses which will be adversely affected.

**Karen Peck**
Clerk to Burrough Green Parish Council
clerk@burroughgreenparishcouncil.org.uk

Please be advised that I work part-time, so there may be a slight delay in my responses.

**BURWELL PARISH COUNCIL**
**The Jubilee Reading Room**
**99, The Causeway, Burwell Cambridge. CB25 0DU**
**Telephone 01638 743142**
**E-mail burwellpc@burwellparishcouncil.gov.uk**

**Chairman: Mrs E Swift** **Clerk: Miss K Hyett**

15 January 2025

The Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

Ref: EN010165
Response emailed to KingswaySolar@planninginspectorate.gov.uk

To whom it may concern,

Please be advised that Burwell Parish council's response to your consultation is as follows:

Burwell Parish Council has reviewed Kingsway Solar's Environmental Impact Analysis Scoping Report and listened to the views of concerned members of the community we represent. The Council have stated that it is difficult to respond without having clarity on the preferred connection corridor at this stage or where 'Burwell South', will be located.

However our concerns are as follows:

- the impact on local wildlife and nature sites such as Spring Close, Priory Meadow and Woods and Pauline's Swamp, as well as our chalk streams and lodes should be incorporated with particular emphasis on how this may impact on wildlife corridors to these sites and biodiversity losses or gains;
- the lack of clarity on the route of cabling and the environment impact of cabling either underground or overground;
- the level and impact of noise from the connection disturbing local residents and wildlife, how this will be measured, monitored and enforced;
- the impact on our local farmers and landowners, their well-being and ability to manage their land effectively. They do not feel they are being consulted and the feedback is that they are bullied into having pylons on their land;
- the visual impact of the proposed construction of a 440kV overhead pylon and cable (OHL) to connect the proposed PV arrays to the national grid at a new substation, termed Burwell South. We would

request that an underground connection option is assessed in exactly the same way as OHL routes for the entirety of Kingsway Solar's chosen route.

We are concerned that this process is proceeding with a complete lack of clarity as to where the connection will be and would suggest decisions are delayed until National Grid are able to provide this information.

Yours sincerely

Katherine Hyett
Clerk, Burwell Parish Council

Cambridgeshire County Council

My ref: KwS–EIA Sc-140125
Date: 14th January 2025
Contact: Alice Tithecott
Email: NSIPs@cambridgeshire.gov.uk

Frank Jordan, Executive Director
**Place and Sustainability**
**Environment, Planning and Economy**

**Consents Team**
PO Box 761
ALC2660
Huntingdon
Cambridgeshire
PE29 9QR

Sent via email to:
KingswaySolar@planninginspectorate.gov.uk

Dear PINS,

**Environmental Impact Assessment (EIA) Scoping consultation by Kingsway Solar Farm Limited ("the Applicant") for Kingsway Solar Farm Development Consent Order (DCO) proposals**

I am writing on behalf of Cambridgeshire County Council (the Council) in response to your request dated 17th December 2024 regarding the Applicant's EIA Scoping Report for the Kingsway Solar Farm proposals. The Council understands that the Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008, and that the Applicant has sought a Scoping Opinion from the Planning Inspectorate (PINS), on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Council acknowledges that it has been identified by PINS as a consultation body to inform the Scoping Opinion. Attached to this letter is a table containing the Council's views on this matter.

If you have any queries regarding this submission or require any further information, please contact NSIPs@cambridgeshire.gov.uk.

Yours faithfully

**Tim Watkins**
**Head of Planning**

# Kingsway Solar Farm: Comments on the Applicant's EIA Scoping Report

This document sets out the comments by Cambridgeshire County Council (**the Council**) regarding Kingsway Solar Limited's EIA Scoping Report for the Kingsway Solar Farm Development proposals.

The following table contains comments across a number of technical specialisms.

| Specialism | Proposal aspect referred to | Comments |
|---|---|---|
| Air Quality | | The Council would expect the applicant to consult South Cambridgeshire District Council and East Cambridgeshire District Council on this matter regarding the site and any associated infrastructure that falls within South Cambridgeshire District Council's or East Cambridgeshire District Council's boundary.<br><br>Notwithstanding the above, the Council has concerns related to air quality impacts from the proposal and therefore reserves the right to comment on this subject through technical working groups and future consultation with the applicant, in particular where it relates to Health. |
| Communities, Skills, Employment, Socio-economics | | The Council notes that this Solar Project will not impact on the use of any community land but are concerned over the access to the Public Rights of Way. PRoW come under a separate council team, (see comments below) however the Communities' Service would like to comment that access to walking and the countryside is very important for our communities and brings numerous health and social benefits. Therefore, The Council asks that any alternative routes to the established rights of way must be put in place before closure of existing ones, so no disruption occurs for residents accessing these assets. Consideration is also needed for those accessing these assets and any issues that the new routes would cause this access.<br><br>The council recommends targeted consultation / engagement of directly affected residents, organisations, and businesses to hear their voices on the mitigations against the loss of view, the disruption during build and potential loss of revenue for businesses. Communities should be encouraged to take part in expressing their views and propose realistic mitigations on the negative effects present. Consultation should be done in a variety of different manners to ensure all residents are able to access this and have their say (paper, electronic, face to face, telephone). |

| Specialism | Proposal aspect referred to | Comments |
|---|---|---|
| | | Educational opportunities should be maximised within this project. For example, visits for local groups and schools to the finished site to understand the technology and the benefits of green energy, encouraging new skills and knowledge in learning from this area.<br><br>The report talks of loss of employment from farmland used for the project, but increased employment for construction workers and those employed on site once the project is running. Apprenticeships and employment of local people into these new roles would benefit the local communities affected here and leave a positive legacy for those affected. This would need ensure that the level of loss versus new opportunity is not a deficit. Active effort should be made to draw from local resource. |
| Noise | | The Council would expect the applicant to consult South Cambridgeshire District Council and East Cambridgeshire District Council on this matter regarding the site and any associated infrastructure that falls within South Cambridgeshire District Council's or East Cambridgeshire District Council's boundary.<br><br>Notwithstanding the above, the Council has concerns related to air quality impacts from the proposal and therefore reserves the right to comment on this subject through technical working groups and future consultation with the applicant, in particular where it relates to Health. |
| Climate and Carbon | | The climate change chapter covers both resilience of the Scheme to the changing climate and quantification of any greenhouse gas emissions or reductions which could contribute to future climate change.<br><br>In paragraph 6.9.5 the applicant states that their intention to assess the GHG emissions savings from the operation of the Scheme based upon a comparison of operational emissions per kWh energy generation against those from a gas-fuelled power station, while also noting the difficulties with this methodology. However, this method is not acceptable as it assumes new fossil-fuelled technology would be the likely alternative energy generation to new solar schemes. This assumption does not align with National Policy Statement for Renewable Energy Infrastructure (EN-3), which at 1.1.3 reiterates government policy that "by 2035, all our electricity will come from low carbon sources, subject to security of supply". Therefore, any comparator must be aligned to delivery of this policy. Should the applicant wish to undertake direct comparison with other energy generation types, another low-carbon option, such as wind, would be a more appropriate comparator. |

| Specialism | Proposal aspect referred to | Comments |
|---|---|---|
| | | Alternatively, an acceptable approach could be to calculate the carbon emissions displaced by the scheme when compared to the carbon intensity of the current and future energy generation in the UK. Should this approach be taken, it must take into account projected future decarbonisation over the years, as this must be regarded as the most likely scenario. Predictions of the carbon intensity of the UK electricity grid by year are readily available, published by the Department for Energy Security and Net Zero (DESNZ). Sensitivity analysis may consider the potential change to displaced emissions in the event that the UK electricity grid decarbonises faster or slower than predicted.<br><br>The applicant should consider land use and land use change in addition to the other sources of construction phase GHG emissions listed in paragraph 6.9.7. |
| Health | | The general approach and the topics considered for assessment in Section 5.8 are appropriate, however the impacts on mental health for the lifetime of the scheme living next to a Solar Farm should be considered and added to the of topics to be assessed.<br><br>The methodology is not given and there is no mention of a Health Impact Assessment (HIA). There is a lot of overlap between the Environmental Impact Assessment and HIA; in fact the methodologies are very similar. The preferred option is for the applicant to produce a combined HIA and EIA (an Integrated Assessment (IA)).<br><br>The EIA scoping report suggests a Human Health ES chapter is excluded from the scope of the EIA. The County's view is there ought to be a Human Health chapter inclusive of a HIA. The HIA methodology needs to be agreed with Public Health at the CCC and needs to meet the requirements in the South Cambridgeshire District Council Local Plan and East Cambridgeshire District Council Local Plan. Health impacts, inequalities and mitigations will and should be embedded across all relevant chapters of the ES, however a master summary ideally should be found in the Health Chapter. |
| Biodiversity | Scoping report | 1.72 The list of Local Development Plans should be expanded to include Greater Cambridge's Biodiversity Supplementary Planning Document (including target of 20% biodiversity net gain) and East Cambridgeshire's Natural Environment Supplementary Planning Document. It should also take into account any Neighbourhood Plans for the parishes, particularly where those define biodiversity net gain and opportunities for biodiversity net gain. |

| Specialism | Proposal aspect referred to | Comments |
|---|---|---|
| | | 2.7.42 Biodiversity enhancement shouldn't just focus on increasing the "diversity from the current baseline". It should also take into account the long-term nature conservation proposals for the areas, please refer to East Cambridgeshire Interim Nature Recovery Network and Cambridgeshire & Peterborough Local Nature Recovery Strategy (to be published in 2025).<br><br>2.11.3. It is expected that solar farms implement a comprehensive management and monitoring of biodiversity features throughout the lifetime of the scheme and for a period of 30 years after the decommissioning phase, with biodiversity features retained in-situ. This should be incorporated into the outline Decommissioning Environmental Management Plan and planning obligations, similar to those secured as part of the Sunnica Energy Farm (PINS reference EN010106).<br><br>4.11.7 The council welcomes the inclusion of assessment for Eversden and Wimple Woods SAC as part of the SAC, particularly given the potential adverse impact of solar farms on bats. The council recommends that survey and assessment methodology is agreed with the local authorities and Natural England. It should build on previous / ongoing survey work undertaken in associated with development (e.g. A428 Black Cat – Caton Gibbet road improvement scheme, Bourn Airfield development and East West Rail).<br><br>4.11.9 The Council welcomes the commitment to achieving a "minimum of 10% BNG". However, the scheme should seek to deliver at least 20% Biodiversity Net Gain, in accordance with Greater Cambridge's Biodiversity Supplementary Planning Document. This accords with other NSIP schemes, where 20% BNG has been secured by suitably worded requirements / obligations, see Cambridge Waste Water Treatment Plant Relocation (PINS reference WW010003).<br><br>The Cambridge Nature Recovery Network and East Cambridgeshire's Nature Recovery Network (interim) reports be utilised to identify areas of moderate strategic significance within the biodiversity metric, until the draft Local Nature Recovery Strategy for Cambridgeshire and Peterborough is produced in 2025 (which will map areas of high strategic importance).<br><br>The BNG assessment should be based on the latest statutory biodiversity metric and associated guidance (unless specific metric for NSIPs is produced). It will be important that biodiversity metric calculations accurately reflect the existing habitat and are realistic about what habitat can be delivered on solar farms. Please ensure that solar panel arrays are classified in accordance with version 2.0 of the UKHabs classification system as "*strips of panels as u1b6 and strips of vegetation as grassland"*. The type of grassland will need to reflect the ground conditions, proposed grassland seeding and be based on the most likely management (e.g. can a hay cut be taken? Is it likely that grazing will be implemented?). The council |

| Specialism | Proposal aspect referred to | Comments |
|---|---|---|
| | | would expect the majority of habitat within the solar panel fields to be classified as modified grassland, to reflect the limited diversity of flora capable of being delivered in the stressed and shaded conditions.<br><br>6.1.2 (bullet point 4) Search areas for bat SAC should extended to 30km (as has been the case for other NSIPs in the area, including A428 Black Cat to Caxton Gibbet road improvement scheme).<br><br>6.1.2 (bullet point 7) Search for priority habitats should be extended beyond the Site boundary for those that could be impacted due to impacts on hydrology (e.g. reedbeds & lowland fen), tree root protection areas (woodland) and pollution (e.g. grassland). Assessment must also be extended to irreplaceable habitats (e.g. veteran / ancient trees, ancient woodland and lowland fen).<br>6.1.2 (page 86-87) It is recommended that proposed survey methodology and assessment are agreed in principle with the local authorities.<br><br>The proposed site has the potential to support a variety of notable flora, particularly given it's located to many wildlife sites designated for their botanical interest. For example, Lizard Orchid (Schedule 8 plant) are known to be expanding their distribution across Cambridgeshire, with the likely seed source from the Devil's Dyke Special Area of Conservation. Cambridgeshire also supports farmland of county and national importance for its arable flora. Therefore, the council would expect detailed botanical surveys are completed across the entire scheme and cable route, throughout the botanical season, to provide a true reflection of the site for arable flora. If notable arable flora are present, an arable flora mitigation strategy providing a network of suitable locations for arable flora management across the scheme (outside of solar panel areas) should be developed and agreed in principle with the local authorities.<br><br>The wider landscape, including ditch networks and wildlife sites, support aquatic species of local, national and international importance (including spined loach, for which Fenland SAC is designated). It is therefore important that detailed surveys of watercourses impacted directly (e.g. fragmentation, loss of habitat and shading) or indirection (e.g. pollution) are adequately surveys of watercourses and the species they support, including fishes, aquatic flora and invertebrates should be completed.<br><br>6.1.2 (page 86) it is important for the invertebrate assessment to consider both direct and indirect impacts to aquatic and terrestrial invertebrates. Solar farms impacts to invertebrates could include habitat loss and also affecting lifecycle of those that lay eggs in water. Particularly consideration should be given to aquatic invertebrates found within the nearby waterbodies / watercourses, as well as those for which nearby wildlife sites are designated. |

| Specialism | Proposal aspect referred to | Comments |
|---|---|---|
| | | 6.1.4 The council notes that a number of surveys have been completed, or proposed, to inform the EIA baseline characterisation. It is recommended that the proposed survey and assessment methodology is shared and agreed with local authorities as soon as possible. Survey work must be undertaken in accordance with the latest survey guidelines (e.g. recent publications for badgers and bird surveys).<br><br>6.1.5 Baseline conditions should also consider present of Local Sites within 2km of the Site boundary,<br><br>Non-statutory designated sites (p104) should include all Local Sites within 2km, including Hill Crofts and July Course Grasslands County Wildlife Sites.<br><br>Please note that Cambridgeshire Geological Society are looking at potential candidate Local Geological Sites / Local Geological Sites within this area and therefore recommend future discussions are held with Cambs Geological Society<br><br>6.1.5 (Page 117) Agree that Dormouse is unlikely to be present in this area of Cambridgeshire.<br><br>6.1.6 The council would expect oCEMP to include horizontal directional drilling to minimise impact to watercourses and notable / protected species that they support.<br><br>6.1.6 (Page 121) The council notes that Developable Areas A – West and B – Central support high Important Arable Plant Area of national importance for arable plant assemblages (6.1.5, page 110). These areas must be retained. It must also be noted that arable flora populations can fluctuate significantly on a yearly basis and therefore, it must be assumed that other nearby farmland is also likely to support flora of similar quality, with any 'downgrading' of quality supported by evidence of repeated surveys should be completed in subsequent years. A draft arable flora mitigation strategy should be developed in collaboration with local authorities to ensure that there is adequate protection and management of the areas for these species. The council would expect nationally important areas to be protected and managed for these species linked by a network of land managed for arable flora. The strategy will need to consider the impact of solar farms on the microclimate required by these species as well as ensuring the areas of sufficient size to be resilient and allow adequately management.<br><br>6.1.6 (page 122-123) Assessment for bats much take into account the latest research that suggests solar farms have adverse impact on bats, this is particularly important if it will impact barbastelle bat population of |

| Specialism | Proposal aspect referred to | Comments |
|---|---|---|
| | | Eversden and Wimpole Woods SAC. Consideration must also be given into any impact of the BESS during the operational phase.<br><br>6.1.9 (page 143) The Council considers it impossible to determine at this stage whether any ecological receptors should be scoped out, given the council has not had sight Appendix F (Preliminary Ecological Appraisal) or ecological reports setting out the survey work that has been completed; with much of the ecological survey work is ongoing. The council therefore does not support the scoping out of any ecological receptors at this stage.<br><br>The council is concerned that the impact to Eversden and Wimple Woods SAC has been scoped out, given that solar farms and high-powered cables have been shown to have an adverse impact on bats. Further survey work / evidence if required to demonstrate that the bat population of Eversden and Wimpole Woods SAC remains unaffected.<br><br>The only exception is impacts to Hazel Dormouse, which the council agrees should be scoped out.<br><br>Appendix F: Preliminary Ecological Appraisal (Developable Areas) have not been provided with a copy of this confidential document and therefore as such cannot determine whether it is adequate to be utilised to 'scope out' any species, habitats or wildlife sites.<br><br>6.1.11 The proposed solar farm is a large-scale project and as such, should seek to deliver landscape-scale biodiversity enhancements. Sites A, B and C provide an opportunity to connect wildlife sites of national and internation important and other restoration schemes, such as chalk grassland quarry restoration at Wilbraham Chalk Pit (planning reference CCC/24/110/DCON). As well as helping deliver the Natural Cambridgeshire Local Nature Partnership's target to doubling nature, and the aims of the Cambridge Nature Recovery Network and East Cambridgeshire's Nature Recovery Network (interim). |
| Archaeology and Historic Environment | Scoping Report/entire proposal | The applicant has proposed that Cultural Heritage including below ground archaeology is scoped into the Environmental Statement (ES) for the DCO application, which the Cambridgeshire Historic Environment Team (CHET) welcomes.<br><br>The Scoping Report's Cultural Heritage chapter lays out proposals for surveys to inform the ES, along with broad baseline conditions based on currently available information. It describes potential secondary/tertiary |

| Specialism | Proposal aspect referred to | Comments |
|---|---|---|
| | | mitigation options and likely significant effects. CHET does have concerns/reservations about some of the information and proposals presented.<br><br>The applicant describes consultation that has been carried out and is proposed with various stakeholders in para 6.3.1. CHET has had requests for Historic Environment Record searches (to inform the baseline) and agreed the scope for a geophysical survey back at the start of last year (2024). The council has not been consulted by the applicant's agents with regard to the over-arching archaeological implications of the scheme, which is highly unusual at this stage of such a large project with such major potential impact. The level of engagement is low given the size of the scheme, and the amount of evaluation that will need to take place to inform the DCO submission. Despite requests for updates on the progress of the geophysical survey (which the council expects to monitor) the council has received nothing further from the applicant's agents in this regard.<br><br>There is a lack of commitment to intrusive evaluation in para 6.3.4. Trial trenching will certainly be needed to inform the ES chapter in the DCO, as per other NSIP and TCPA solar applications in Cambridgeshire (e.g. East Park Solar/Sunnica) and as per NPS EN3 (para 3.10.101 footnote 86 & 3.10.104). It is standard practice in Cambridgeshire and regionally to intrusively evaluate solar developments predetermination to identify areas that might require preservation in situ, by nature of the significance of the archaeology or potential impractical expense to the developer of archaeological mitigation excavation. Large areas of significant or dense archaeology can in theory make a solar development unviable, as common 'no dig' solutions for panels and cabling can be considered inappropriate, depending on the depth, significance and fragility of the archaeology. It is therefore imperative to fully evaluate the proposed development site predetermination.<br><br>This landscape has very high potential for as yet undiscovered significant archaeological remains that may be of equivalent significance to scheduled monuments - the number of likely prehistoric barrows alone attests to parts of the developable area being important funerary landscapes. An approach to intrusive evaluation was devised for East Park Solar that CHET believes is proportionate and more widely applicable to solar schemes – The council can share this with the applicant and/or their agents as a brief.<br><br>Please note the figures in Appendix I relating to the historic environment reproduce data licensed from the Cambridgeshire Historic Environment Records (HER) without proper reference or attribution. All HER monument records are referred to as non-designated heritage assets (NDHAs), which is an error - while all NDHAs should be monument records, not all monument records are NDHAs, which is a specific planning |

| Specialism | Proposal aspect referred to | Comments |
|---|---|---|
| | | definition, and the two should not be uncritically correlated. The data is also out of date, as the last HER search requested by the applicant's agents is over a year old. It is also noted there are errors in the figures.<br><br>A few specific comments regarding the scoping report:<br><br>6.3.4 - will the aerial investigation be carried out by a specialist according to Historic England AIM principles?<br><br>6.3.4 – as mentioned above, trial trenching will certainly be needed from a CHET perspective.<br><br>6.3.5 - no reference to the intrusive archaeological work that has happened within the developable area? e.g. ECB3592<br><br>6.3.7 - broadly agree with this<br><br>6.3.9 - agree<br><br>6.3.13 – add the trial trenching<br><br>6.3.14 – answers to the applicant's questions:<br><br>• Do you agree with the proposed consultees to be engaged with on this topic? Yes<br>• Do you agree with the proposed study area? Yes<br>• Do you agree that the data sources listed to inform the EIA baseline characterisation are appropriate? Only if appropriate intrusive evaluation takes place<br>• Do you agree that the surveys proposed to inform the EIA baseline characterisation are appropriate? Only if appropriate intrusive evaluation takes place<br>• Are any receptors/assets/resources not identified that you would like to see included in the EIA? Earthworks around Weston Colville could be a real constraint<br>• Do you agree with the proposed additional (secondary and tertiary) mitigation<br>• measures and is this mitigation appropriate? Yes, avoidance of impact or mitigation excavation<br>• Do you agree with the receptors/matters that are proposed to be scoped in and<br>• out of further assessment? Yes<br>• Do you agree with the proposed factor-specific assessment approach? Yes |

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| Landscape and Visual Impact | | The Council would expect the applicant to consult South Cambridgeshire District Council and East Cambridgeshire District Council on this matter regarding the site and any associated infrastructure that falls within South Cambridgeshire District Council's or East Cambridgeshire District Council's boundary.<br><br>Notwithstanding the above, the Council has concerns related to the landscape and visual impacts from the proposal and therefore reserves the right to comment on this subject through technical working groups and future consultation with the applicant, in particular where it relates to users of public rights of way. |
| Minerals and Waste | | 1.7.2 (Page 9) The Cambridgeshire and Peterborough Minerals and Waste Sites Specific Document was superseded by the Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021)<br><br>Figure 2-1(Page 20): Environmental and planning features Grid Connection Search Corridor A (Environmental Constraints Plan) includes within its area a site (identified in red below) called Great Wilbraham Quarry. This is an active quarry safeguarded under Policy 16 of the Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021) (MWLP). To comply with Policy 16 any proposed development must not prejudice the existing or future use of the area for which it has been designated; and not result in unacceptable amenity issues or adverse impacts to human health for the occupiers or users of such new development, due to the ongoing or future use of the area for which it has been designated. Any proposals should comply with Policy 16 of MWLP. Kingston Solar Project is advised to consider the quarry as a constraint and reflect it as such in the relevant documentation.<br><br>4.4.5 (Page 228) Recognition of the Consultation Area of the safeguarded quarry known as Great Wilbraham Quarry; and the Minerals Safeguarding Areas, both as identified in the Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021) is welcomed. The scoping report does not go into detail as to the likely effect of the proposed development on the safeguarded quarry, and it has not been sufficiently demonstrated that the proposed development will not affect Great Wilbraham Quarry, nor the significance of that effect. Until it has been demonstrated that there is no significant effect, this should remain scoped in. The GIS extents of these constraints are available on the Council's website (https://www.cambridgeshire.gov.uk/business/planning-and-development/planning-policy/adopted-minerals-and-waste-plan) |
| Water Resources and Flooding | | The Scoping Report submitted includes information on surface water flood risk, and demonstrates consideration for water quality, climate change, access for maintenance, as well as protection of surface water during the construction and decommissioning phases. At present there are no details as to how surface |

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| | | water will be managed onsite although the applicant anticipates that surface water will be discharged to watercourses at Greenfield runoff rates.<br><br>Water quality is of particular importance as some areas of the site fall within groundwater Source Protection Zones. Altering any natural flow paths should be avoided where possible and consideration should be given to the design and layout of the Battery Energy Storage System (BESS).<br><br>The LLFA expects a full flood risk assessment and/or surface water drainage strategy to be submitted to support any future submissions which must include:<br><br>1. How the proposed surface water drainage scheme has been determined following the drainage hierarchy<br>2. Pre-development run-off rates<br>3. Post development run-off rates with associated storm water calculations<br>4. Discharge location(s)<br>5. Drainage calculations to support the design of the system<br>6. Drawings of the proposed surface water drainage scheme including sub-catchment breakdowns where applicable<br>7. Maintenance and management plan of the surface water drainage system (for the lifetime of the development) including details of future adoption<br><br>To provide additional support, we offer a pre-application advice service. The applicant should, as part of the surface water strategy, demonstrate that the requirements of any local surface water drainage planning policies have been met, and the recommendations of the relevant Strategic Flood Risk Assessment and Surface Water Management Plan have been considered. |
| Traffic and Transport | | **Transport Assessment**<br><br>From a transport perspective, a full Transport Assessment (TA) will be required to accompany any forthcoming planning application so that the transport implications of the development can be understood. CCC's TA guidelines can be found here Developing new communities \| Cambridgeshire County |

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| | | Council https://www.cambridgeshire.gov.uk/business/planning-and-development/developing-new-communities<br><br>Pre app advice is available and details can be found at the following link Developing new communities \| Cambridgeshire County Council https://www.cambridgeshire.gov.uk/business/planning-and-development/developing-new-communities<br><br>Cambridgeshire's Active Travel Toolkit can be found at the following link Cambridgeshire's Active Travel Strategy \| Cambridgeshire County Council https://www.cambridgeshire.gov.uk/residents/travel-roads-and-parking/transport-plans-and-policies/cambridgeshires-active-travel-strategy<br><br>The applicant should ensure that the transport data used in the EIA and the TA are from the same source to ensure consistency between the two documents.<br><br>The Transport Assessment should give details of the following:<br><br>· A profile of the likely daily (2 way) traffic associated with the construction phase over the 24-month construction period and decommissioning periods. Also, daily and peak hour all mode trips generated over various phases.<br><br>· This should be further broken down into vehicle classifications with particular emphasis of the type of HGV's that will be used and any 'abnormal' or oversized vehicle movements.<br><br>· The proposed routing of vehicles to and from the Strategic Road Network with pinch points such as congested links and or junction being identified.<br><br>· The applicant should refer to Cambridgeshire County Council's 'Transport Assessment Requirements 2024, which sets out the trigger points for further link or junction analysis to be undertaken.<br><br>Non-Motorised User and Road Safety Audits must be carried out where the proposal could result in increased conflict between vehicles and Non-Motorised Users and where the nature of the highway infrastructure changes such that there may be consequential Road Safety issues across all user groups. |

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| | | There is likely to be a requirement for enhanced NMU infrastructure to mitigate the impact of the large volumes of Heavy Goods Vehicles associated with construction and decommissioning phases.<br><br>Mitigation measures will be required to mitigate the impact of the development and enhance connections by sustainable modes.<br><br>A Travel Plan for the construction phase should be submitted.<br><br>**Highway Development Management**<br><br>Main report Section 6.7 Pages 261 – 275<br><br>6.7.4 A significant amount of the historic data traffic indicated appears to be limited across the network and out of date, requiring new ATC and turning movement count data collection to inform both the EIA and the Transport Assessment; this element should be scoped with the council's TA team once the access routes and access points are known.<br><br>6.7.5 Preliminary Tables are provided in relation to the suitability of the for links to cater for two-way traffic: for the:<br><br><u>Baseline Condition of Road Links - Developable Area and Inter Array Connection Corridors</u><br><br><u>Baseline Condition of Road Links - Grid Connection Corridors</u><br><br>Primarily, the extent of use of any given link to be utilised and the location of site access is unclear at this stage; further Parish names have not been provided for all links (i.e 'Mill Road', Mill Hill', 'Common Road', 'Grange Road', 'Brook Lane' etc), and it has not been possible to review these links. It is suggested that the applicant also reviews the National Street Gazeteer to determine 'A', 'B', 'C' and Unclassified Road status.<br><br>Notwithstanding the above, a number of the streets indicated as two-way passing are somewhat challenged geometrically for two-2way HCV's, notably Six Mile Bottom Road, Chapel Road - Weston Green, The Common - West Wratting, Angle End - Great Wilbraham, Station Road Dullingham, Heath Road/ Reach Road/ Wiers Drove – Burwell.<br><br>It is however noted that the submission states "The "Configuration" column reflects the findings of a visual review to ascertain whether a specific link can accommodate two streams of traffic passing each other. It is |

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| | | an initial indicative analysis and is not intended to be viewed as being definitive. (Page 267)"; this element and the suitability of a given link to cater for two-way traffic HCV will require further review in due course and may be reflected in the overall mitigation package.<br><br>In relation to mitigation (6.7.6), the applicant's attention is drawn to the comments made by the HDM and Transport Assessment Teams in relation to the Non-Statutory Consultation of December 2024 and the need for a separate Transport Assessment, to be scoped with CCC and National Highways.<br><br>6.7.12 All construction works within the public highway shall comply with CCC adopted document 'Housing Estate Road Construction Specification 2023 (HERCS)' unless otherwise agreed with CCC. Junction geometry, visibility etc for approach roads and shall be assessed in accordance with CCC adopted document 'General Principles for Development'/ and the suite of documents contained within the 'Design Manual for Roads and Bridges'.<br><br>It is again noted that 'Traffic estimates for any stage of the Scheme are not confirmed at this time and may be subject to change but will be confirmed prior to assessment.'<br><br><u>App Part 1 (A to D) Appendix C Traffic Transport: EIA Significance Criteria Pages 357 - 364</u><br><br>As noted above in relation to Main Report para 6.7.4, discuss data suitability with CCC TA Team.<br><br>The acceptability of the scheme impact/ extent and nature of any mitigation will be dependent upon routing, access point locations, relative impacts/ duration and nature of the link, which are unknown at this stage.<br><br>The wider significance of an impact in accordance with IEMA guidance will need to be considered in more definitive terms in relation to the production of a Transport Assessment for the impacted network, and particularly in relation to the minor links providing access to the site, which will need to be assessed in terms of capacity, condition, safety and any temporary or permanent mitigation. The applicant is referred to CCC commentary in respect of the 'Non-Statutory Consultation' of December 2024. This is acknowledged to a degree in the document Page 363:<br><br>"A quantitative approach to the assessment of traffic and transport related effects will be used, in accordance with the IEMA Guidelines. This relies on percentage changes in daily traffic movements along road links, which determine the significance of effect. However, some traffic and transport related effects, for example non-motorised user amenity and road safety, cannot be assessed using changes in traffic movements |

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| | | associated with the Scheme. To that end, the assessment carried out within this chapter will equally need to rely on other assessment criteria as set out in the IEMA Guidelines, alongside professional judgement." |
| Public Rights of Way (PROW) | EIA Scoping Report | Public Rights of Way (PROW)<br><br>- CCC notes from Appendix L to the EIA that there are a very large number of PROW that are directly and indirectly affected by the proposals. At this stage it is not possible to accurately gauge the impact of the development on each PROW, and it is not known which PROW might be subject to temporary or permanent closures or diversions. Therefore, CCC reserves the right to comment further on the impact the development would have on PROW, and potential mitigations the authority might seek, until further details are available.<br><br>Nevertheless, at this point we do have the following comments:<br><br>- Section 6.8.8 outlines potential for significant impacts on PROW users as a result of the development. Preceding section 6.8.7 outlines additional details of the inconveniences that the development may introduce to PROW users. At the Applicant's admission, these negative impacts are potentially significant and therefore CCC anticipates a robust package of mitigation and compensation measures to be delivered in association with the development.<br><br>- Understanding the potential visual impact of the development on receptors who use CCC's PROW and rural road network forms an important part of CCC's consideration of the application. This will inform the mitigation measures that CCC feels are appropriate. CCC would welcome the opportunity to contribute to the selection of representative viewpoints on its PROW network.<br><br>- National Planning Policy Framework paragraph 105 states that "Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails". CCC's Rights of Way Improvement Plan also states that "development should contribute to the provision of new links and/or improvement of the existing rights of way network".<br><br>Accordingly, CCC wishes to understand how the Applicant intends to maximise this opportunity to deliver mitigations and enhancements to the PROW network in the affected area and its hinterland, to reduce the negative impacts of the development and support achievement of a positive legacy. Mitigation options for the impact that the development will have on PROW users should not be confined to the development |

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| | | boundary. The development will have a lasting impact on the landscape that cannot be removed during the lifespan of the solar park. Compensation for this enduring change should be provided in the form of improvements to public access in adjoining communities.<br><br>- Cambridgeshire's Rights of Way Improvement Plan (ROWIP) should be considered by the applicant when proposing temporary and permanent alterations to the PROW network affected by the solar park. CCC will challenge the imposition of any changes that are contrary to the ambitions of the ROWIP or the NPPF.<br><br>- CCC welcomes the provision of an outline Public Rights of Way Management Plan (oPRoWMP) and is willing to engage with the Applicant regarding the content of this document. The oPRoWMP must be subject to CCC's consent. CCC will not be able to support any alteration to PROW that commences prior to the authorisation of a full PROW Management Plan. CCC requires engagement from the Applicant regarding the agreement of requirements related to management of PROW during construction, protocols related to temporary closures and diversions, restoration of pre-commencement conditions, processes for permanent closure and diversion, and certifications required for adoption of new/diverted PROW.<br><br>- Page 38, para 2.7.40, table 2-2. The table outlines 'Minimum anticipated offset to solar infrastructure', including a 10m offset for PROW. Can the Applicant please clarify if it is referring to a 10m offset on both sides of an affected PROW (effectively creating a PROW corridor of 20m width) or a total offset of 10m (leaving a PROW corridor of 10m width)? CCC also wishes to understand which PROW (or parts of PROW) the Applicant envisages being subject to the 'minimum' offset, and where it is intended to provide more substantial offsets. |

The Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay house
2 The Square
Bristol
BS1 6PN

**Your Ref** EN010165

**Our Ref** IPP-258

**Monday 13 January 2025**

**Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations)**

**– Regulations 10 and 11**

**Application by Kingsway Solar Farm Limited (the Applicant) for an Order granting Development Consent for Kingsway Solar Farm (the Proposed Development)**

**Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested**

Thank you for your consultation.

We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Trust is a prescribed consultee in the NSIP process.

Having reviewed the location of the project and the relationship of the proposals with our network, we do not believe that the proposals as shown would cross any land or waterspace owned or operated by the Trust. The Trust therefore has **no comment** to make on the proposals.

However, pursuant to the charitable objectives of the Trust, we support the preservation, conservation, and protection of inland waterways for the public benefit. We therefore advise that consideration is given to any response from the Inland Waterways Association, The East Anglian Waterways Association and Environment Agency.

Please do not hesitate to contact me with any queries you may have.

Yours sincerely,

**Anne Denby MRTPI**
Area Planner

Canal & River Trust Spatial Planning Team
**E:** planning@canalrivertrust.org.uk **W:** canalrivertrust.org.uk **T:** 0303 040 4040

Patron: King Charles III. Canal & River Trust, a charitable company limited by guarantee registered in England and Wales with company number 7807276 and registered charity number 1146792, Registered office address National Waterways Museum Ellesmere Port, South Pier Road, Ellesmere Port, Cheshire CH65 4FW

**Carlton cum Willingham Parish Council**
**Comments on the Kingsway Solar Scoping Environmental Impact Assessment Report**
January 2025

## Community and rural setting

The parish of Carlton cum Willingham consists of the main village of Carlton, where our only community building, St Peter's church is located, and the small hamlets of Willingham Green one mile or so to the north west and Carlton Green one mile to the south. The total population is about 165. Although only a 20 minute drive from both Newmarket and Haverhill, there is an intensely rural character to the village and hamlets, surrounded as they are by undulating mainly arable fields, small woodlands and shelter belts, hedgerows and miles of footpaths and bridleways.

Many residents were born in the villages and others have deliberately chosen to move here, in order to enjoy the countryside and these footpaths, which are heavily used. We know from the visitors book in St Peter's that many visitors also come to the village, drawn by its attractive setting and enjoying local walks, as well as following nearby walking trails including the Icknield Way, Stour Valley footpath and the E2 European Long Distance Route.

Our parish boundary is unusual in being far larger than the village framework and extends in an elongated 'bulge' all the way to almost reach Six Mile Bottom Road. Area C cuts across this land and runs right up to the Carlton village boundary, to within 200 metres of Cocksedge Farm, surrounds one side of Willingham Green right up to residents' back gardens on the western side of Willingham Green Road and along Weston Colville Road, and its eastern boundaries lie only a couple of fields' distance west from Carlton Green. Lower Wood, a much valued and important local nature reserve, is also right on the boundary of Plot C.

The images below show the countryside around Carlton. The third and fourth image show the view from the footbridge next to Cocksedge Farm.

**Difficulties with responding to the scoping EIA report**

The scoping report has been written before the design of the proposed scheme (position and layout of solar panels, battery storage etc) has been published. The report repeatedly says that 'the detailed design of the Scheme is still emerging, as are the environmental surveys and assessments required to support the planning and EIA process', and further states that some aspects of the design may not be decided until after the development consent order has been made.

We know that area C was a very late addition to the development plan, with A and B having been presented in early 2024. The report says that many of the environmental and other studies that are required will be carried out in area C during 2025 and as a result this scoping report is lacking in detail and any certainty in relation to area C, making it difficult to assess confidently.

**Choice of location and other options considered**

The justification for the choice of area C in the development in particular, is unconvincing in Section 3.2.

In his letter responding to the informal consultation, our district councillor Geoff Harvey, describes how there appears to have been a complete volte-face in DRD's

plans for Kingsway Solar, from presenting areas A and B in early 2024 with a connection offer for 200 MW accepted and with work taking place to establish an onsite Point of Connection to the National Grid through the 400kv Burwell to Pelham line that crosses the site', to now the addition of area C and the need to build a cable back to Burwell South.
Our local MP, Pippa Heylings, has responded to concerns of local residents and stated that the Liberal Democrats are strongly advocating with the government to produce a Land Use Framework, which would guide future renewable proposals to the most appropriate locations and that it is wrong to approve new solar developments before this is in place.
Instead, area C appears to have been added simply because the local landowner in area C has been willing to put up vast tracts of his estate for lease, which is hardly a planned and logical way to develop such nationally important renewables projects on a scale as large as this.
To say in fact (Sections 3.2.4 and 3.2.5) that key factors in choosing the three sites A, B and C were land characteristics and topography calls the choice of these areas into question, given their rolling and undulating landscape which would make it extremely difficult to adequately screen panels and batteries from view. It is also strange that Table 3-1 states under 'proximity to sensitive human receptors' that 'consideration was given to the proximity of nearby sensitive human receptors which include residential dwellings, populated areas and villages', when area C surrounds West Wratting, Weston Colville and as already said, would be right outside the back gardens of residents in Willingham Green.

**Landscape and visual amenity**
It is difficult to understand the report's assertion that (page 191):
'For all of the above settlements there would be generally limited views of the Scheme due to the gently undulating local topography, scattered vegetation across the landscape, inward looking nature of many of the settlements and, in relation to the Developable Area, the largely low-level nature of the Scheme. There is theoretical potential to see elements of the Scheme from the edges of these settlements, particularly those in proximity to the Grid Connection Corridors. There is also potential through design and mitigation to minimise the potential views of new infrastructure, particularly associated with the Developable Areas'.

To describe the residential areas as 'inward looking' and that there is only 'theoretical potential' to see the scheme from the edges of the villages is wrong for what are often linear layouts of villages such as Willingham Green and Weston Colville where back gardens frequently have open views across open countryside and residents walk pathways and bridleways daily across the landscape, looking beyond their residences.

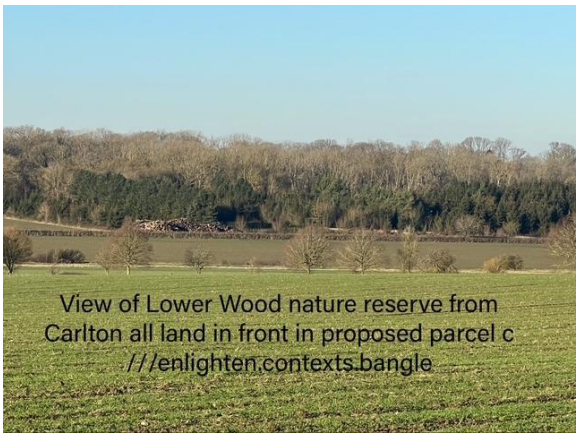
The first group of settlements listed in Section 6.2.5 page 190 Visual Receptors Settlements is confusing and misleading. West Wratting and Weston Colville would be surrounded by the development, not 'directly adjacent to Developable Area C'

and the report also incorrectly states that only the outer edges of West Wratting are within the ZTV, whereas it, along with Weston Colville, Weston Green and Willingham Green, as well as most of Carlton are actually entirely within the STZ.

Section 6.2 does not therefore adequately reflect or give consideration to the significant and adverse impacts  on the landscape and visual amenity that this development would have. As the report states, the ‘landscape has distinctive, open, panoramic views to wooded horizons’.

The project’s vast scale would significantly alter the East Anglian chalk hills landscape in Areas A and B and the wooded claylands landscape of Area C. The introduction of solar arrays, battery energy storage systems (BESS), and a 14 km overhead grid connection would disrupt the rural character and visual continuity of the region. These changes will be particularly noticeable from elevated viewpoints and along public rights of way, diminishing the area’s appeal to both residents and visitors.

Below are some images of the fields around Carlton, which are part of Area C, to show views towards Lower Wood nature reserve from Carlton and the view through the hedge to Area C from the bridleway which goes north west from near St Peter’s Church .



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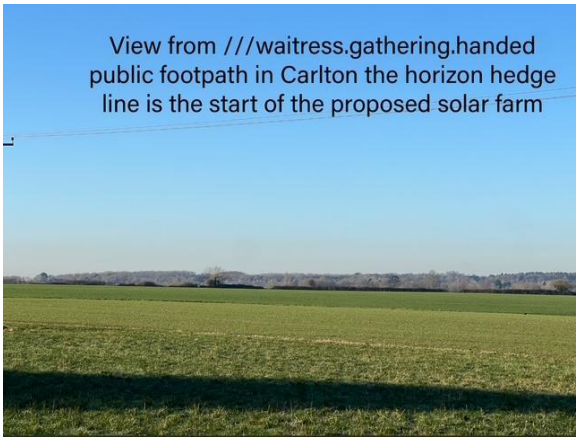
|  | |

The proximity to Registered Parks and Gardens, such as Wilbraham Temple and Swaffham Prior House, and Conservation Areas like Balsham West End and Brinkley, further intensifies concerns. These areas are valued for their historical, aesthetic, and recreational significance. Mitigation measures such as extensive tree planting and visual barriers are unlikely to fully offset the industrial aesthetic.

*Glint and Glare*

For these reasons, although 'Glint and Glare' is scoped out of the environmental factors for further assessment (Section 5.3), it is difficult to believe that on such undulating landscape, hedging and other vegetation would be able to adequately mitigate the impact on dwellings, PRoW and country roads. We note that a detailed separate glint and glare assessment will be undertaken to inform the design development and landscape mitigation plan.

*Lighting*

We are concerned that lighting of the solar farm, particularly during construction, should be scoped in for further assessment in the EIA and ES because of its impact on landscape character and local wildlife. There are poor existing examples of bright lights impacting the local area at the Jelly Warehouse and Weston Woods Farm, and given that the construction phase would last as many as three years, it would be preferable for construction lighting, even if only occasional or temporary, to be appropriate to its rural setting.

***Scoping questions 6.2.13***

*Do you agree with the proposed consultees to be engaged with on this topic?*

Parish Councils are not listed as consultees in this section and it is perhaps not therefore surprising that some parish councils, including ours, were initially excluded from the Planning Inspectorate's notification of EIA Scoping report consultation, and were only included when we questioned this. It is disappointing that despite this omission the deadline for submissions has not been extended. As the closest layer of local government to many of the receptors included for assessment in the

Landscape and Visual Impact Assessment, it is essential that parish councils are involved in discussions and able to represent their residents' concerns.

*Do you agree that the surveys proposed to inform the LVIA are appropriate?*

We would ask that further assessments will be undertaken to inform the EIA, post-scoping (6.2.4) so that we are assured that Area C has been adequately assessed, given it was only added to the development plan in summer 2024.

*Do you agree with the landscape and visual receptors that are proposed to be scoped in and out of further assessment?*

See above regarding glint and glare and construction lighting remaining in scope.

*Are there any other developments which you consider it will be necessary for us to address in a cumulative landscape and visual impact assessment?*

Yes, the 13 wind turbines already in area B and associated pylons across to the substation at Burwell. See also other sites listed in 'Cumulative Effects', below.

**Agricultural Land Classification**

The proposed Kingsway Solar Project will utilise approximately 1,520 hectares, a significant portion of which consists of the Best and Most Versatile (BMV) agricultural land (Grades 1, 2, and 3a). These grades categorise the land as highly productive and critical for food security.

In Section 3.2.5 the applicant details that a site-specific Agricultural Land Classification (ALC) survey was completed in spring 2024 for areas A and B which found that 45.9% of the land in areas A and B is of grade 3a or higher, which is at odds with Natural England classifications that the whole area is BMV, grade 3 and above.

The National Planning Policy Framework (NPPF) emphasises protecting BMV land, stating that local planning authorities should guide development to areas of poorer agricultural quality whenever possible. Developing this project on BMV land contradicts these principles, risking long-term agricultural productivity in the region. In stating that planning policy doesn't preclude the use of BMV land for solar development and finding that the ALC is downgraded in quality, it is concerning that the applicant seems to be laying the ground for a loose interpretation of national policy statements and pursuing development on BMV land. We await the outcome of surveys of agricultural land quality for Area C and hope that sufficient detail will also be provided about the survey itself, as there are no details provided in the report about the organisation which carried out the surveys of Areas A and B and what method was used.

The loss of BMV land to such a huge development also raises concerns about national food security amidst growing demands for sustainable and locally sourced food production. This region contributes significantly to arable farming outputs, supporting a range of crops vital to both local and national markets. The potential

displacement of farming activities may result in increased reliance on imports, which undermines efforts to bolster domestic food resilience.

Furthermore, the loss of prime agricultural land will adversely affect local farming communities, reducing employment opportunities and impacting the local economy. Farming supports not only agricultural workers but also supply chains, local businesses, and regional markets. It is worrying that the report states in 6.8.4 that no surveys are planned regarding employment and the local economy and that baseline information from other environmental factors will be used instead.

The EIA scoping report lacks sufficient justification for prioritising this site over areas of lower agricultural value, and as described earlier in our response, it fails to provide a comprehensive assessment of alternative locations, locations which could minimise the impact on high quality agricultural land.

**Biodiversity, habitats and wildlife**

The developable project site includes and is near several ecologically sensitive areas:

- **Statutory Sites:** Devils Dyke SAC, Fleam Dyke SSSI, and Newmarket Heath SSSI, among others.
- **Non-Statutory Sites:** Old Cambridge Road Verges CWS and West Wratting Valley Farm CWS.

These areas host diverse flora and fauna, including protected species and priority habitats. The development threatens deciduous woodlands, lowland calcareous grasslands, and lowland fen areas. These habitats provide critical ecosystem services, including carbon sequestration, water filtration, and biodiversity support, which would be severely compromised by construction and operation activities.

Disturbances during the construction, operation, and decommissioning phases risk habitat fragmentation, species displacement, and long-term ecological degradation. Having such large tracts of land fenced once the solar farm is operational is bound to have long-lasting impact on the movement of mammals such as deer, badgers and hares.

Furthermore, the report acknowledges proximity to ancient woodlands like Hill Croft and Great Coven's Wood. These irreplaceable resources serve as biodiversity hotspots and cultural landmarks. Disruption to these woodlands could result in the loss of habitat for key species and diminish their historical significance.

The EIA scoping report inadequately addresses potential mitigation measures and it isn't clear what 'mitigation/compensation' means in 6.1.8. While measures such as buffer zones and habitat creation are mentioned, there is insufficient detail on how these will be implemented and monitored over time. A comprehensive ecological management plan is necessary to minimise habitat destruction, manage species relocation, and ensure long-term ecological resilience.

It is therefore very concerning that it is stated that relevant ecological and habitat surveys haven't yet been carried out in area C. How then is it also stated that proximity of Developable areas A and B being close to Area C means that they are known to contain similar habitats? It is doubtful that this can be entirely true given the chalk hill character of the landscape in Areas A and B and the wooded clay land of Area C and the lack of surveying done in Area C to date.

**Scoping question section 6.1.14** - *Do you agree that the surveys proposed to inform the EIA baseline characterisation are appropriate?*
No. The Table in 6.1.10 pages 176-177 scopes out many species and receptors such as woodlands, river and streams in Area C from further assessment. We request that as stated in 6.1.9 the scoping of receptors in and out of the PEIR and/or ES will be revisited as the design of the scheme progresses and would strongly argue that the receptors on pages 176-177 should be scoped in from the outset until equivalent land-based surveys to those already carried out in areas A and B are also carried out in area C.
We note that the scoping report states that Ramsar sites have been avoided and that the planned Habitats Regulations Assessment (HRA) will consider these sites. Wicken Fen (Ramsar criterion 1) for example is only 2.08km north west of the developable site and we are concerned about the impact of the solar farm and pylons during construction and once operational, for important migratory birds, so would argue that these should be scoped in for the developable areas A-C, not only the grid connection corridors.
Finally, we hope that the applicant would be genuinely held to improvement work for enhancing the environment as outlined in Section 6.1.11, as part of any planning approval.

**Water and Groundwater**
Water is scoped out when only two waterbodies in A and B are named but those (the Stour and Granta) in area C are not mentioned in section 4.11.2. It's not clear therefore why it is proposed in 5.2 that water is excluded from the scope of the EIA.

Sections of the site lie within Flood Zones 2 and 3, indicating significant flood risk. We believe that the water table in Area C is high. The construction of impermeable surfaces and infrastructure could exacerbate surface water runoff, heightening the likelihood of downstream flooding. Furthermore, potential contamination from construction activities may jeopardize nearby water bodies and aquifers, including those designated as principal aquifers and Source Protection Zones (SPZ).

**6.4.13 Scoping question** *'Are any receptors/assets/resources not identified that you would like to see included in the EIA?*

It is reassuring to read that groundwater contamination is scoped in to further assessment for the construction and decommissioning phases (6.4.8) but worrying that it is then scoped out of assessment for the operational phase.

The potential impact of contamination during operation caused by for example discharge, losses or fire from the BESS on agricultural drainage systems must be assessed, as disruption to these networks could have cascading effects on local farming operations. We would therefore argue that contamination of groundwater during the operational phase should be scoped into the EIA and ES for more detailed assessment.

**Traffic and road infrastructure**

We note that the applicant states that assessment of potential traffic and road infrastructure is all based on desk -based studies at the moment and that some of the DfT count data in the report is well over ten years old. As residents who are familiar with our local roads we can assert that it is naive and ill advised to think that these roads would be able to cope with an increased volume of HGV traffic during the construction phase of the project.

In areas A and B, proximity to the A11 and the Wadlow Wind Farm may make traffic movement less problematic but area C is further from these and would mean that use of local smaller and narrower roads would be unavoidable.

It is not just the narrowness of many of the roads, particularly in area C that is the problem, but their general state of disrepair with large numbers of potholes. Creating passing places as mitigation will only partly address the challenges of large vehicles, and in reality may not be possible anyway. Existing heavy farm traffic leaves ruts on road verges and at peak times such as harvest, two streams of traffic meeting each other usually results in vehicles having to mount the verges.

Many of the villages in Area C, including Willingham Green, lack pavements for pedestrians meaning that residents are obliged to walk in the road. It is therefore essential that construction traffic should be prohibited from taking routes through these villages.

It is also a major concern that an increase in HGV traffic and traffic volumes will inevitably lead to further degradation in the condition of our roads. The impact of such a large development with its impact on local residents in terms of traffic, noise and air quality over such an extended period of years, should not be underestimated.

For all these reasons the proposed Construction Traffic Management Plan (page 268) would be essential and it should outline specific measures to minimise degradation and disruption, such as designated haulage routes, restricted delivery hours, and regular road maintenance.

**6.7.13 Scoping questions**

Overall we are in agreement with the scoping questions and approach outlined, but it is difficult to see how as stated in 6.7.6, local wildlife sites on verges can be avoided when developing mitigation measures, on such narrow rural roads.

**Major accidents and disasters**

We are extremely concerned that the applicant proposes scoping out of further assessment the risk of a major accident or disaster caused by fire in the Battery

Energy Storage Systems (BESS). Although such fires are rare, the industrial scale of this proposed development must surely raise the risk level. Given that the development could also be located over a principal chalk aquifer that supplies drinking water to Cambridgeshire, Suffolk and beyond, information about mitigation should be comprehensive and detailed in the EIA itself and not only in an outline Battery Safety Management Plan as proposed in section 2.7.19.

In a discussion at our EGM with our residents in November 2024, they also questioned the safety of the panels themselves in a location which is very open and subject to stronger winds than are generally forecast. Coincidentally, shortly after this discussion, Storm Darragh was reported to have left hundreds of panels at the Porth Wen solar farm lifted from their mountings and destroyed. Given the anticipated changes in our weather patterns due to climate change and the potential proximity of the solar farm to housing, this now seems a valid concern.

**Cultural Heritage**

The proposed development endangers several Scheduled Monuments, including Fleam Dyke and Devil's Ditch. These ancient sites hold immense historical and archaeological significance, reflecting centuries of local heritage. Their inclusion within or near the development area risks physical damage and loss of setting integrity, which is crucial to their historical value and public appreciation.

Additionally, the site is near several Listed Buildings and Conservation Areas, such as Willingham Green, West Wratting and Great Wilbraham. These assets contribute to the cultural identity of the region, attracting visitors and supporting local businesses. For example, heritage tourism in these areas sustains small enterprises, including bed-and-breakfasts and guided tours. The project threatens to erode this cultural and historical character, a concern inadequately addressed in the scoping report.

A comprehensive cultural heritage assessment is needed to evaluate the full extent of the project's impact on these assets, including indirect effects on their settings. This assessment should prioritize stakeholder engagement, ensuring local voices are heard in preserving the region's rich heritage.

***6.3.14 Scoping Question*** *- are any receptors/assets/resources not identified that you would like to see included in the EIA*

We note that the list of heritage assets is an 'initial gazeteer' but residents have alerted us to the omission of Cromwell Cottage (grade II listed Ref 1127133) in Willingham Green and the finds of over 614 artefacts of Roman, Celtic, Viking and Medieval origin found in Area C at Grid Ref: TL6258 54126, TL 624 541, behind Cromwell Cottage at TL 625 541 and south down to Cricks Farm TL 618 541 and also at the site of St. Matthews Chapel, Willingham Green TL6247 5395.

Attached with this response is a report from the Environment Team at Cambridgeshire County Council, which we have obtained, detailing the monuments

and sites of cultural, historical and archaeological significance in and immediately surrounding Carlton in area C.

**Cumulative Effects**

Within our local area there are already a number of existing and planned renewable developments, as well as other large agricultural buildings with an industrial aesthetic. These include:

1) The wind farm of 13 turbines and a solar farm at Wadlow beside the A11

2) A biodigester approved to be built at Streetly End with another also in planning near Haverhill

3) An existing solar farm at Great Wilbraham

4) Solar farms approved by Sunnica north of Newmarket and in development at Six Oaks Renewable Energy Park, Bottisham

5) The Thurlow Grain Store at Weston Woods

6) The Camgrain Grain Store at Six Mile Bottom

7) As well as the new substation planned at Burwell.

The huge Kingsway Solar project with a 14 km corridor of overhead lines risks creating a significant cumulative visual impact when considered alongside this other infrastructure. The combined effect risks creating an industrial landscape, diminishing the rural character of the area, residents' enjoyment of their local environment and potentially deterring visitors who contribute to the local economy through tourism and leisure activities.

The EIA scoping report states in 7.1.33 that 'there is no formal guidance on the criteria for determining significance of inter-project cumulative effects' and we fear that the combined effect of these developments will amplify landscape degradation, biodiversity loss, as well as creating a disproportionate burden on the local area. Our local area is already contributing significantly to renewable energy and adding such a huge solar farm and battery storage would create a disproportionate burden.

A more detailed cumulative impact assessment is required to evaluate how these projects collectively affect the region's environmental and social fabric. This assessment should include input from local stakeholders including residents to ensure a comprehensive understanding of the combined pressures on the community, its health and the environment.

**Conclusion**

Overall the EIA Scoping Report has raised many concerns for residents in Area C, particularly since it is stated that many assessments and surveys of Area C are outstanding and have not been carried out before this scoping report was submitted. We hope that the Planning Inspectorate is mindful of this and of the total opposition to this planning proposal amongst residents of our parish in Area C, who are extremely concerned about its impact on local biodiversity and wildlife as well as its

impact on their wellbeing and enjoyment of the Cambridgeshire countryside that they have chosen to live in.

# Cambridgeshire Historic Environment Team Explanatory Notes

## HER Records

### Reference fields in HER Reports

Cambridgeshire HER has three successive formats for the HER reference number, the oldest records are a five digit number (e.g. 09751) and date back to the old pre digital county indexing system. As the HER was transferred to a digital database the old five digit numbering system was replaced by Unique ID's generated by the new database. In order to differentiate our records from other counties they all began with 'CB' for Cambridgeshire (e.g. CB12345). As the database developed further, the unique ID prefix was updated to 'MCB' for **M**onument **C**am**B**ridgeshire (e.g. MCB23456).

The relevant HER reference can be found at the start of the HER Monument record here and should be used as the primary reference for that HER record:

| HER Number | Site Name | Record Type |
|---|---|---|
| 09751 | Ring ditches and linear ditches, Great & Little Chishill | Monument |

### Cambridgeshire HER Records

Different HERs create their records in different ways, there are two main methods – 'lumping' or 'splitting'. Splitting records is usually done on a period basis so a site that recorded Neolithic, Saxon and 19th century features may have three separate records, splitting can also be done based on the source so a site that saw a geophysical survey, an evaluation and an excavation may have separate records for each phase of work. 'Lumping' records is a flatter approach to record creation and is usually geographically based. A large site that has two discrete areas of activity across 4 phases of work, one showing Neolithic and Roman and the other Iron Age and Medieval would have two records with further evidence successively attached to each one.

### County HERs and NMR Archive Swindon

The National Monument Record (NMR) was a separate database created and maintained by Historic England (and their predecessors). As part of a national programme of work we have now accessioned all NMR/NRHE records held by Historic England into the county level HER.

All responsibility for maintaining, securing and providing access has now been transferred to Cambridgeshire and the NRHE records are archived and no longer updated. This includes references to sites identified by the Historic England Aerial reconnaissance team and available online here.

### Further information requests

The majority of unpublished fieldwork reports are now available in digital format online at the **ADS Grey Literature Library** or Oxford Archaeology's **OA library**. The Oxford Archaeology website also includes copies of the Cambridgeshire County Council Archaeological Field Unit (CCC AFU) reports. For all other source enquiries please contact us, quoting the relevant SCB found in the monument/event description. The majority of older reports pre c2005 are held by CHET and can be provided in digital format on request.

# Event Records

Event records represent the known catalogue of archaeological fieldwork in Cambridgeshire from antiquarian investigation through to modern planning led development as well as community led projects. The essential identifier for each site is the ECB (**E**vent **C**am**B**ridgeshire). For planning led fieldwork, the ECB is the principal archive reference for the archaeological archive and will associate that archive with the source and any relevant HER Records.

Event numbers are now issued (since 2018) per site **and** per individual stage of fieldwork to allow for accurate cataloguing of the archaeological archive and different geographic extents to be mapped against each record.

# GIS data

## CHER GIS Licence

Enquiries may include GIS data, free of charge, where the receiving client can accept it. Every enquiry will include a GIS licence. If you require GIS data, please complete page 3 of the licence and return to arch.her@cambridgeshire.gov.uk.

The responsible officer should be the person requesting the GIS data and the Licencee (organisation) should be the company receiving the search results, most commonly the archaeological unit carrying out the fieldwork or research.

GIS data is provided in shapefile format by default but can also be supplied in Geopackage or MapInfo format. Shapefile or geopackage data is compatible with most GIS programs (Esri/opensource QGIS).

Mapinfo format is compatible with Mapinfo only.

- GIS data supplied as standard includes available HER records, Fieldwork and designations. Cropmark mapping data from specific Aerial Investigation Mapping projects is supplied where available.
- We do not provide conservation area information as that is held by the district councils.
- While Cambridgeshire does have historic landscape characterisation, due to fundamental flaws with the dataset we do not use it.
- Cambridgeshire does not use archaeological notification or priority areas.
- Due to GDPR restrictions we do not incorporate the Portable Antiquities Scheme (PAS) data into the HER.

## Coordinate Reference System

GIS Vector files are saved in shapefile format compatible with ESRI/QGIS systems. Mapinfo files can be supplied upon request.

The default CRS is EPSG:27700 OSGB 1936/British National Grid – Projected

## Reference fields in HER Monument shapefiles

The HER Monument layers include a series of fields.

| Field | Description |
|---|---|
| **MonUID** | All HER records have a unique ID, including the original records referred to by their five digit number. This is automatically completed. |
| **Prefref** | This refers to the HER reference ID used by Cambridgeshire HER and should be the reference system used |
| **Name** | Free text and generally follows the format of 'when it was, what it is, where it is.' |
| **RecordType** | HER records have a series of basic types for indexing purposes, they are Buildings, Monuments, Findspots, Landscapes, Maritime, Hedgerow and Park & Garden. |
| **MonType** | This lists the monument types associated with this record. Taken from the Monuments Thesaurus. |
| **Evidence** | Index of evidence types for the record – whether documentary, cropmark, earthwork, excavated feature, sub surface deposit etc. |
| **Date** | General period associated with the HER Record. HER records of cropmark evidence are typically recorded as unknown unless further fieldwork has been carried out. |
| **MI_PRINX** | autogenerated |
| **xgGeometryType** | autogenerated |
| **xgCreated** | autogenerated |
| **xgedited** | autogenerated |

## Reference fields in HER Fieldwork shapefiles

The HER Event Fieldwork layers include a series of fields.

| Field | Description |
|---|---|
| **EvUID** | All HER records have a unique ID. This ID is essential to fieldwork archiving |
| **RecordType** | Event records have a series of basic types for indexing purposes, they are Event – Survey (non intrusive fieldwork), Event – interpretation (documentary/desk based works) and Event – intervention (intrusive fieldwork) |
| **Name** | Free text and generally follows the format of 'what it was, where it was and when' E.G. Excavation at 23 High Street, Whittlesey in 2023 |
| **Organisation** | Principal Archaeological organisation responsible for the fieldwork |
| **Date** | Date range when the fieldwork was carried out. |
| **MI_PRINX** | autogenerated |
| **xgGeometryType** | autogenerated |
| **xgCreated** | autogenerated |
| **xgedited** | autogenerated |

## Geographic Position

HER records have two 'precisions' when it comes to where they are placed on a map. The 'input' precision which relates to what information we know about the unit of archaeological information, and the 'output' with relates to how accurately we can locate that information on a map.

A four digit grid reference is accurate to within 1000m

Records with a four digit grid reference are in the HER, they are normally for verbal or documentary sources with very little accurate information on their exact location, there are a volume of records that

can never be improved. They could relate to a parish, or they could be documentary references to a building in a town but that is the only level of information available. You will often find multiple points at the same location.

Where this is the case, we manually indicate this in the HER coordinates section, but in this case the GIS mapping is **just** as significant because the point will be at the **bottom left corner** of a grid square.

A six figure grid reference is accurate to within 100m, that is the expected standard of the PRN records.

The HER contains a significant number of records that predate GIS, the core dating from the late 1970s to around the 1990s. All records that have a PRN 5 digit HER references were originally drawn on paper maps with an accompanying index card. Where this occurs, the default was only portrayed as six figure grid references because that was the minimum that could be reliably provided and/or recorded at the time.

In other cases, a six digit grid reference may be used the reflect the fact the record is a central point to a much larger heritage feature such as a cropmark or earthwork. The default location information for **the vast majority of** the HER is still point based GIS data. Polygon based GIS data is a relatively recent concept and was only available in HERs from the mid 2000s, and only really became standard in the last decade.

Where this is the case, it will display in the HER database as such. It is important to check the HER record because the GIS will not be aligned with the OS grid squares and may *appear* to be more accurately placed than within 100m of that particular point:

Eight digit grid references are accurate to within 10m

Modern GIS can provide a far greater accuracy and as a minimum we use an output of 8 digit positional accuracy from a point in modern GIS. The default GIS mapping standard is based not on written records (including verbal communication or documentary sources) but on what is visible on **visual** resources (including LiDAR, aerial imagery, rectified historic maps, grey lit plans/shapefiles, websites). This represents a really fundamental shift in how records are created.

When a point or a polygon is created now, the HER gives the record a default positional accuracy of 8 digits to allow for some error in the digitisation. If a modern (by modern I mean created or edited in the last 10 years) record displays a positional accuracy of less than 8 digits, that is because the HER officer has *manually* adjusted the positional accuracy to reflect uncertainty in the GIS location.

There are other factors that may influence the positional accuracy of a record including the digitising source – geo-rectified historic maps for example will be located to the best possible accuracy but are unlikely to fully line up with Mastermap, equally features from aerial imagery that cannot be geo-rectified will also bear some uncertainty in the GIS location.

## Ridge and Furrow and furlong boundaries in Cambridgeshire

Known areas of ridge and furrow records have now been recorded at a parish level with a maximum of three records per parish, extent of known ridge and furrow is recorded as polygons as identified through historic aerial imagery and/or LiDAR. Each parish record maps the known extent of ridge and furrow. They are listed with the Record Type of Landscape and are characterised as follows:

Former ridge and furrow. N*o longer* present on recent imagery. This heritage asset is considered a levelled earthwork feature.

Cropmark remains of ridge and furrow. Is *only* visible as cropmarks on recent imagery. This heritage asset is considered a relict landscape type.

Earthwork remains of ridge and furrow. Remains present as *upstanding earthworks* on current LiDAR dating to c.2020-2022.

Furlong boundaries are a distinctive earthwork feature identified across Cambridgeshire of uncertain but probable Saxon to post medieval date. They have been identified largely through Historic England aerial mapping projects and are mapped at a single record per parish level. They are listed with the Record Type of Landscape.

## Reproduction of HER Data

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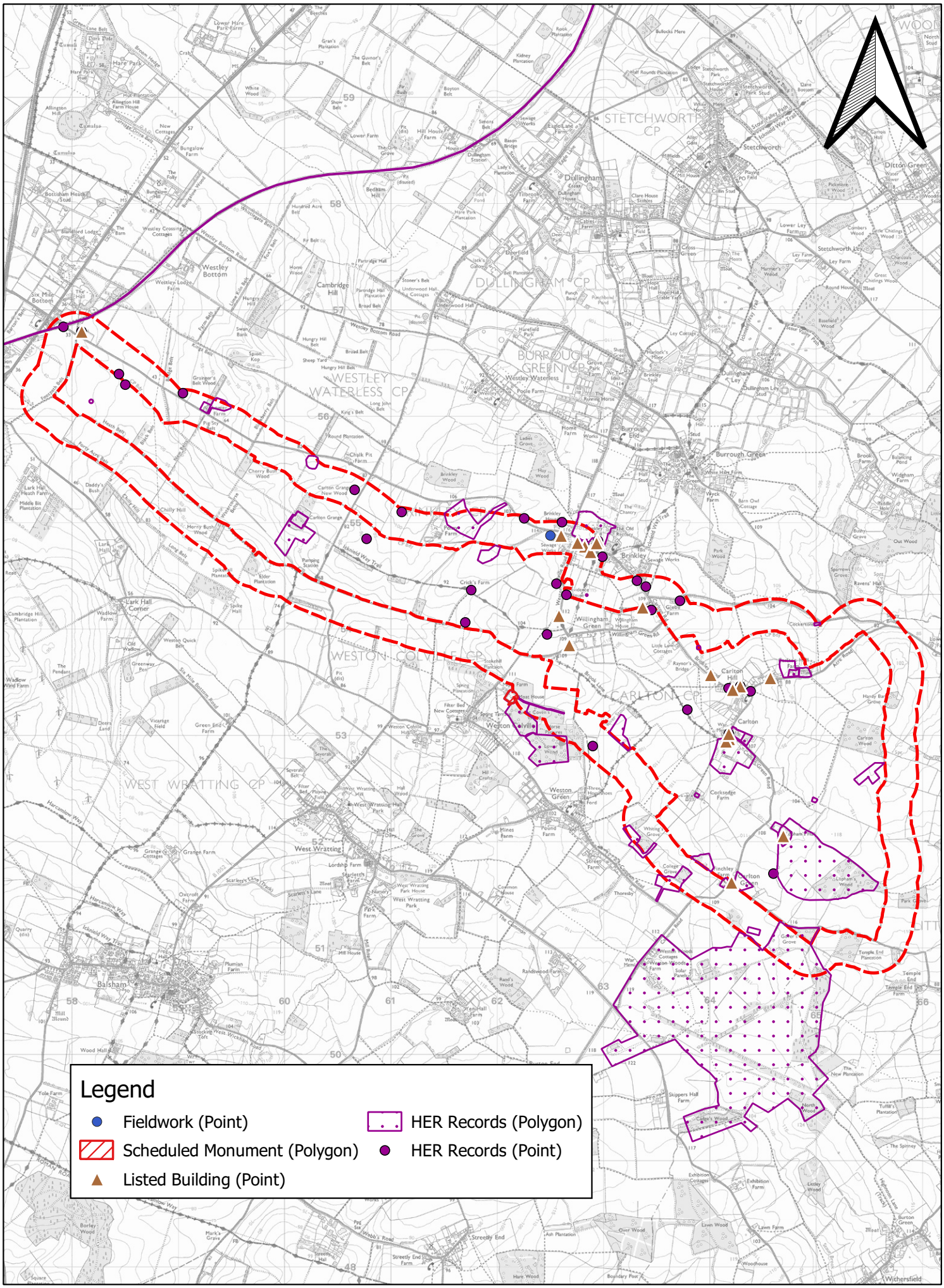
# Cambridgeshire Historic Environment Record

Cambridgeshire County Council




Scale (at A4) 1:45,000

11-12-2024

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## Cambridgeshire County Council Historic Environment Record

*11/12/2024*

| HER Number | Site Name | Record Type |
|---|---|---|
| 01146 | Moat at Carlton Hall Farm | Monument |

### *Classification*

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| Moat | Medieval - 1066 AD to 1539 AD | Earthwork |

### *Monument Status and Scores*

**Associated Legal Designations**

| | | |
|---|---|---|
| DCB920 9 | Active SHINE | A moated site where only the north side survives, it is located directly east of Carlton Hall Farm, Carlton |

**Other Statuses and Cross-References**

| | |
|---|---|
| NRHE to HER HE HOD UID for Monuments - 377270 | Active |
| SHINE Candidate (Yes) | Active |
| Original Record Number - 01146 | Active |

**Ratings and Scorings**

| | |
|---|---|
| Completeness | 4 |
| Condition | B |

### *Location*

**National Grid Reference** TL 648 535

**Administrative Areas**

Civil Parish Carlton, South Cambridgeshire, Cambridgeshire

**Address/Historic Names**

Hall Farm Carlton

### *Description*

1, At site of Carlton Hall. Original size of enclosure appears to have been 200 feet square. The moat only survives along the N side and round the NW and NE corners. It gets its water from the infant River Stour which passes on the N side, and its width is 30 feet. The enclosed area is now deserted and marshy. The site formerly belonged to the priory of Lewes.
O1, The E arm remains as a depression up to 4m wide and up to 20cmdeep.
O2, No trace of hall or moat continuation. Area recently levelled. Delete Carlton Hall (site of).
Status: ?Building: yes C20 Occupied: yesWater supply: streamAssociated mill noSurface finds noAerial photos noEnclosure plan singleEnclosure type ?Enclosure banks noneWet moatSize: width: 20m depth: 0,5mAppendages: noneRidge and furrow: none

2. The manor house for this isestate was at Hall Farm and stood within a rectangular moat, of which there are now only slight traces. On a map of 1767, it was almost as a complete circuit and contained three buildings, with three more outside the moat. The house has now been restored, but the moat is filled in.

5. No evidence of the former Carlton Hall is visible on the ground. The area has been levelled in recent years and parts of the moat destroyed. Only the north arm now remains; this measures 90.0m long by 12.0m wide with no ground evidence of the other arms visible. The site is generally marshy with the water level maintained by a feeder of the River Stour. Published 25" survey revised on AM.

### *Sources*

(1) Bibliographic reference: Salzman, L.F (ed) 1948. The Victoria County History of Cambridgeshire and the Isle of Ely. Volume 2. , 20

ID: SCB14649, Location: HER

(2) Bibliographic reference: Taylor, A. 1998. Archaeology of Cambridgeshire, Vol.2: South East Cambridgeshire and the Fen Edge. , p. 21
ID: SCB21794, Location: HER Library

(3) Map: 1960. OS 6 inch map.
ID: SCB8922

(4) Cartographic materials: Rev ONB 1901 13.
ID: SCB63646, Location: Not in HER

(5) Verbal communication: Stevens, P.A. Field Investigator Comments. , 28/1/78
ID: SCB60592, Location: NMRC, Swindon

(6) Verbal communication: Bishop, S. 2010. observations may during Audley End English Heritage study.
ID: SCB63636

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| 01147 | Moated site at Lopham's Hall, Carlton | Monument |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| Moat | Medieval - 1066 AD to 1539 AD | Earthwork |
| Mound | Medieval - 1066 AD to 1539 AD | Earthwork |
| Ditch | Medieval - 1066 AD to 1539 AD | Earthwork |
| Garden | Medieval - 1066 AD to 1539 AD | Earthwork |
| Garden House | Medieval - 1066 AD to 1539 AD | Earthwork |
| Gazebo | Medieval - 1066 AD to 1539 AD | Earthwork |
| Ditch | Medieval - 1066 AD to 1539 AD | Earthwork |
| Fortified Manor House | Medieval - 1066 AD to 1539 AD | Earthwork |
| Open Hall House | Medieval - 1066 AD to 1539 AD | Earthwork |
| Farmhouse | Medieval - 1066 AD to 1539 AD | Earthwork |
| Manor House | Medieval - 1066 AD to 1539 AD | Earthwork |

***Monument Status and Scores***

**Associated Legal Designations**

| | | | |
|---|---|---|---|
| DCB952 6 | Active | SHINE | Medieval moated site at Lopham's Hall, Carlton |

**Other Statuses and Cross-References**

| | |
|---|---|
| NRHE to HER HE HOD UID for Monuments - 377267 | Active |
| SHINE Candidate (Yes) | Active |
| Original Record Number - 01147 | Active |

**Ratings and Scorings**

| | |
|---|---|
| Completeness | 5 |
| Condition | C |

***Location***

**National Grid Reference** TL 646 520

**Administrative Areas**

Civil Parish Carlton, South Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

S1, Lopham's Hall.
S3, Moat at Lopham's Hall 0,5 mile SE of Carlton Church. This is the site of the manor house of Carlton Parva, successively known as Barbedor's and Lopham's. In its present form it consists of a roughly oval area, with long and short axes measuring 300 and 250 ft , surrounded by a wide and deep moat which is still wet round the greater part of its length. The site stands towards the foot of a hill-side sloping gently from the E, with the result that on the E side the moat, 30 ft wide, has a depth of 12ft, with water 12 ft wide at the bottom. This width is maintained all the way round, though the surface of the water is nearly at ground level on the W side where the level falls. There are two breaks in the circuit, both of them comparatively Mod. one on the W side carries the approach road to the C17 farmhouse in the middle of the moated area and the other is a considerable stretch on the SW, where the moat has been filled up. The great mass of earth which must have been removed in digging this moat is nowhere apparent and the inner verge carries no bank, nor has any attempt been made to level up the slope of the enclosed area. An unusual feature is around flat topped mound, deeply ditched round, standing just outside the moat to the S. The mound is 20 ft across the top and does not exceed the surrounding ground in height, so that it is not the product of digging the wide and deep ditch which surrounds it. This ditch touches the moat of the main site , but it is not clear whether it was originally joined to it. That there was originally some connection can hardly be in doubt, and at the present day water which collects in the mound moat flows out to the main one by a gap. The purpose of the mound is doubtful. It is not either sufficiently large or correctly placed for a barbican, and the original entrance must have been by a bridge across the moat on the W side. It seems to fulfil no possible defensive purpose and it may have been part of some garden scheme and carried a gazebo or summerhouse. The age of the main moat is unknown , but it may be surmised from its strength that its purpose was defensive and that it belongs to the earlier

part of the Middle Ages. Its unusual oval form is not necessarily evidence of early date, as the nature of the ground and slope of the hill make a normal rectangular plan inconvenient, and the plan shows distinct signs of a more angular development on the lower ground to the W. It is probable that the moat was first dug round an already existing building.
O1, Now destroyed: the ditch was filled in at least 12 years ago according to the cow man who has worked here that long. It can still be traced as boundary of the house's grounds. The C17 house is derelict. The grounds have been planted with trees but have otherwise been left to become overgrown. Not recommended for scheduling due to its poor comndition.
S2, In Cambs.....field evidence suggests that some moats were constructed around pre-existing buildings as at Lopham's Hall.....In some cases where the moat is set on sloping ground, no attempt has been made even to level up the interior.
O2, The fill of building rubble shows clearly and parts of the E side are still slightly depressed. The S mound has been completely razed and the W pond is now marked by a small depression.
Status: manorial
Building: yes C17 and earlier
Occupied: yes
Water supply:
Associated mill no
Surface finds no
Aerial photos no
Enclosure plan single
Enclosure type circular
Enclosure banks none
dry moat Size: width: ? depth: ?
Appendages: ponds
Ridge and furrow: none

3. Lopham's Hall Farm (name confirmed) is as described by Authy 2 but is now unoccupied and semi derelict. The surrounding moat and associated features have been completely destroyed and afforested. See OS APs.
Published 25" survey revised on AM.

5. Listed as a possible castle by Cathcart King.

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***Sources***


(1) Bibliographic reference: Salzman, L.F (ed) 1948. The Victoria County History of Cambridgeshire and the Isle of Ely. Volume 2. , (1967 reprint), 4
ID: SCB14649, Location: HER

(2) Map: 1960. OS 6 inch map.
ID: SCB8922

(3) Verbal communication: Stevens, P.A. Field Investigator Comments.
ID: SCB60592, Location: NMRC, Swindon

(4) Unpublished document: DOE Dec 1956. DOE list South Cambridgeshire RD.
ID: SCB5428, Location: Not in HER

(5) Bibliographic reference: Cathcart King, D.J. Castellarium anglicanum : an index and bibliography of the castles in England, Wales and the islands. Volume I : Anglesey - Montgomery.
ID: SCB61251, Location: Not in HER

(6) Aerial Photograph: OS AP 76 059 065-6.
ID: SCB63653, Location: Not in HER

(7) Index: 1941. National Building Record Index. , 10116
ID: SCB60593, Location: NMRC, Swindon


---

***Finds - None recorded***

---

***Associated Events/Activities - None recorded***

---

***Associated Individuals/Organisations - None recorded***

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| HER Number | Site Name | Record Type |
|---|---|---|
| 01149 | Moated site at the Old Rectory, Carlton | Monument |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| Moat | Medieval to 19th century - 1066 AD to 1900 AD | Earthwork, Documentary Evidence |
| House | Medieval to 19th century - 1066 AD to 1900 AD | Earthwork, Documentary Evidence |
| Pond | Medieval to 19th century - 1066 AD to 1900 AD | Earthwork, Documentary Evidence |

***Monument Status and Scores***

**Associated Legal Designations - None recorded**

**Other Statuses and Cross-References**

| | |
|---|---|
| NRHE to HER HE HOD UID for Monuments - 1443826 | Active |
| SHINE Candidate (No) | Active |
| Original Record Number - 01149 | Active |

**Ratings and Scorings**

| | |
|---|---|
| Completeness | 4 |
| Condition | A |

***Location***

**National Grid Reference** TL 641 529

**Administrative Areas**

Civil Parish Carlton, South Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

Rectangular moat shown around the rectory which is due S of the church. Broken centrally on the W side for access, its external length E - W was 200 ft, N - S 132 ft. Two rectangular buildings on the platform, their longer sides E - W. The water features shown on OS map may represent remnants of the N arm.
O1, The analysis of the map is misleading - surely the water is the remnants of the S arm; on the NE side of the church a small ditch runs along the road; at the SW side of the house runs a shallow depression and the owner tells us that he filled it in some years ago. In the owner's possession are two pairs of watercolours entitled 'SW Front of the Rectory House at Carleton, Cambridgeshire' one pair dated 1805, the other 1813, depicting architectural changes and showing the moat and a weeping ash that survives today. The owner regaled us with an account of the incumbent of 1805, a former Chaplain to the Prince of Wales who was drowned "fossae" by his indignant butler who objected to the rectors habitual inebriation. The Cambridgeshire Weekly News covered the story some time ago.
Status: ?Building: yes C18 Occupied: yesWater supply: springAssociated mill noSurface finds noAerial photos noEnclosure plan singleEnclosure type ?Enclosure banks noneWet moatSize: width: 9m depth: 0,5mAppendages: noRidge and furrow: none

2. The Old Rectory moated site is first recorded in 1767 on a 'Plan of the manors of Carlton cum Willingham'. The plan shows a rectangular ditched enclosure with a causeway across the west arm. By 1799 the enclosure map shows only the south east and south west arms remaining and the 1882 1st edition 6 inch Ordnance Survey map depicts only the south east arm. The south east arm of the moat now survives only as a pond; the remains of brick revetting are visible toward the south west end. Two sides of sides of the moat site are now under housing. The south east arm survivies as a buried feature. The pond measures 50m in length by 14m wide and is orientated north-east, south-west. The south western arm is represented by a shallow depression; the ditch being filled in by the owner some years ago

3. Estate map of 1767, possibly based on earlier 17th century map records a rectangular narrow moat surrounding two structures adjacent to the church. A causeway is shown on the northwest arm of the moat.

***Sources***

(R1) Map: 1767. Estate map.

ID: SCB5623, Location: R54/21/1

(2) Unpublished document: English Heritage nd. English Heritage Alternative Action Report.
ID: SCB62317, Location: NMRC, Swindon

(3) Cartographic materials: 1767. CRO_R54_21_1. Estate map.
ID: SCB83528, Location: County Archives Store

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| 01150 | Moat near Uplands, Brinkley | Monument |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| Moat? | Medieval - 1066 AD to 1539 AD | Documentary Evidence |

***Monument Status and Scores***

**Associated Legal Designations - None recorded**

**Other Statuses and Cross-References**

| | |
|---|---|
| SHINE Candidate (No) | Active |
| Original Record Number - 01150 | Active |

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 634 543

**Administrative Areas**

Civil Parish Brinkley, East Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

1. Part of three sides of a rectangular moat shown on map of circa 1811 - 1816. Alignment is NNE - SSW with shorter sides to N and S. The N arm is complete and 150 feet long. The W arm is 100 feet long, while the E arm is 250 feet long and narrow to a point at its S end. A rectangular building is shown within the enclosure. Width of the moat is circa 25 feet.
O1, A young wheat crop is low enough for one to see slight undulations in the ground, but no pattern is discernible.

***Sources***

(1) Map: c.1811-1816. Inclosure Map.
ID: SCB12023, Location: R60/24/2/9

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| 01151 | Moat House, Weston Colville | Monument |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| Moat | Medieval - 1066 AD to 1539 AD | Earthwork |
| Fishpond | Medieval - 1066 AD to 1539 AD | |
| Causeway | Medieval to 19th century - 1066 AD to 1828 AD | |
| House | 19th century - 1801 AD to 1900 AD | |
| Causeway | Modern - 1901 AD to 2050 AD | |
| Manor | Medieval to 16th century - 1066 AD to 1560 AD | Documentary Evidence |
| Ditch | 14th century to 15th century - 1301 AD to 1500 AD | |

***Monument Status and Scores***

**Associated Legal Designations**

| | | | | |
|---|---|---|---|---|
| DCB268 | Active | Scheduled Monument | 1019174 | Moat House moated site |
| DCB885 2 | Active | SHINE | | Medieval earthwork enclosures, field system and woodland boundary,Great Covens Wood, on Great Coven's Wood, Western Colville |

**Other Statuses and Cross-References**

| | |
|---|---|
| NRHE to HER HE HOD UID for Monuments - 377255 | Active |
| SHINE Candidate (Yes) | Active |
| Original Record Number - 01151 | Active |

**Ratings and Scorings**

| | |
|---|---|
| Completeness | 1 |
| Condition | B |

***Location***

**National Grid Reference** TL 621 533

**Administrative Areas**

Civil Parish Weston Colville, South Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

1. Rectangular wet moat about 230 ft square at Great Coven's Wood is 20 ft wide and 5 ft deep.This is thought to be the original site of Colville manor, of which 'Coven' is a corruption

2. Shown on 1612 map.S3, Ye moate.

3. An excavation was carried out in advance of the extension of the C19 house. Cobbled surface with dry laid wall possibly contemporary with the construction of the house and lying above two ditches, the earliest of which may be an early field boundary backfilled in C13 - C14 during the construction of the moat. The second ditch may be associated with drainage into the moat.

4. An archaeological evaluation was carried out on 10/03/1993 in advance of the construction of a garage with forecourt and a five-box stable block. Two L-shaped trenches were excavated by JCB, Trench 1 both axes 5m,Trench 2 15m long N - S and 5m long E - W. No archaeological remains discovered in Trench 1, but Trench 2 revealed a Medieval ditch. Within this ditch were pottery sherds comprising East Anglian red sandy wares and reduced wares. A small, heavily corroded, iron knife blade and handle was also found in this ditch. Ancient woodland belonged to Colville Manor and was divided by a strip of pasture into Great and Lower Coven's Wood to the north and south respectively.

5. The monument includes a medieval moated site and associated fishpond at Moat House, located immediately to the west of Great Coven's Wood and approximately 460m to the north east of the village of Weston Colville.
The moated site includes a roughly square shaped island which measures up to 76m north east to south west by 72m north west to south east. This is enclosed by a seasonally water-filled moat measuring up to 13m wide and 2m high and 7m wide and 1.2m high respectively. There are now two causeways across the moat; that on the north western side is known to have been in use

before 1828 and may represent the original access to the island, whilst that on the south east arm is believed to be modern. Approximately 10m from the southern corner of the moated site is a linear pond measuring 22m in length by approximately 6m wide, following the same alignment as the south east arm of the moat. This is believed to be a fishpond contemporary with the moated site.

The moat is thought to represent the original site of Colville Manor, named after William de Colville, who became the holder when he married Beatrice de Stutville in 1200; the manor had first been subinfeudated to the Stutvilles in about 1150. The manor remained in the Colville family until 1369. By 1560 the moated site was no longer the site of Colville Manor, which by 1612 had been replaced by a house to the south west on the site of the present Weston Colville House. The present Moat House, which now occupies the moated site, dates from the 19th century.
Partial excavations carried out on the island in 1991 and 1993 uncovered a series of internal ditches dated to the 14th/15th centuries. Buried building remains have also been identified.

Status: manorial Building: yes C19
Occupied: yes
Water supply: surface
Associated mill no
Surface finds no Aerial photos no Enclosure plan single Enclosure type rectangular
Enclosure banks external Wet moat Size: width: 15m depth: 1,5m
Appendages: ponds Ridge and furrow: no

O2, Moat house (name confirmed) is probably C19 and not outstanding. The house is surrounded by a sub square ornamental moat situated on level ground and filled by surface drainage at the S angle. It measures overall 102m NW to SE by 95m transversely the arms averaging 6m wide by 1,5m deep. An outer bank O,5m high is visible along the NE arm but this is probably the result of spoil dumping. On the outside of the SE arm a much stronger bank is evident which is cut by the original entrance causeway, it measures 3,2m high by 21m wide but does not continue round the other side of the moat, and it is possible that this is a landscaping feature. A probable fishpond 24m long, is evident at the S angle but a pond at the N angle is part of the moat drainage. It is considered that the whole work is probably contemporary with the house i.e. C19. Published 25 in survey revised on AM.

O3, The manor house of Colvilles, the main Weston manor, mentioned in 1150, probably stood within the moat, a quarter mile E of the church.

O4, photos in owner's possession.

***Sources***


(1) Bibliographic reference: Salzman, L.F (ed) 1948. The Victoria County History of Cambridgeshire and the Isle of Ely. Volume 2. , 43, (CW Phillips)
ID: SCB14649, Location: HER

(2) Aerial Photograph:
ID: SCB2984

(3) Unpublished report: Boast, R. 1991. Archaeological investigations at The Moat House, Weston Colville, Cambridgeshire: An interim report. Cambridge Archaeological Unit Report 033
ID: SCB16983, Location: Librarylink

(4) Unpublished report: Gdaniec, K. 1993. An archaeological evaluation at Moat House, Weston Colville, Cambridgeshire. Cambridge Archaeological Unit Report 080
ID: SCB16984, Location: Librarylink

(5) Scheduling record: English Heritage 2001. Moat House moated site. Scheduled Ancient Monument 33267
ID: SCB18168

(6) Verbal communication: Stevens, P.A. Field Investigator Comments. , 28/1/78
ID: SCB60592, Location: NMRC, Swindon


***Associated Finds***

| Find Types and Dates | Object Material |
|---|---|
| FCB20032 KNIFE (1) | IRON |
| FCB20033 SHERD (14th century to 15th century - 1301 AD to 1500 AD) | POTTERY |

***Associated Events/Activities***

| | |
|---|---|
| ECB89 | Evaluation at Moat House, Weston Colville, 1991 (Event - Intervention) |
| ECB1153 | Evaluation at Moat House, Weston Colville, 1993 (Event - Intervention) |

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| 06321 | Tumulus SE of Saint George's Church, Brinkley | Monument |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| Round Barrow | Bronze Age - 2500 BC to 701 BC | Documentary Evidence |

***Monument Status and Scores***

**Associated Legal Designations - None recorded**

**Other Statuses and Cross-References**

| | |
|---|---|
| NRHE to HER HE HOD UID for Monuments - 374416 | Active |
| SHINE Candidate (No) | Active |
| Original Record Number - 06321 | Active |

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 5844 5640

**Administrative Areas**

Civil Parish Brinkley, East Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

R1, Tumulus (NR).See RN 06322 for possibly same barrow.

2. The site lies on the crest of a chalk ridge at circa 45.0m. OD. Nothing visible on the ground.

***Sources***

(R1) Map: 1835. OS 1st edition map.
ID: SCB8858

(2) Verbal communication: Stevens, P.A. Field Investigator Comments.
ID: SCB60592, Location: NMRC, Swindon

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations***

Stevens, P. A. - Historic England

| HER Number | Site Name | Record Type |
|---|---|---|
| 06322 | Tumulus, Carlton | Monument |

This ?Bronze Age barrow is recorded as a 'tumulus' on the OS map.

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| Round Barrow | Bronze Age - 2500 BC? to 701 BC? | Documentary Evidence |

***Monument Status and Scores***

**Associated Legal Designations - None recorded**

**Other Statuses and Cross-References**

| | |
|---|---|
| SHINE Candidate (Possible) | Active |
| Original Record Number - 06322 | Active |

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 585 563

**Administrative Areas**

Civil Parish Carlton, South Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

S1, "Tumulus" marked on R1.See RN 06321 for possibly same barrow.

***Sources***

(R1) Map: OS 1st edition map.
ID: SCB8855

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| 07382 | Saint Matthew's Chapel (site of), Carlton | Monument |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| Chapel | Medieval - 1066 AD to 1539 AD | Documentary Evidence |

***Monument Status and Scores***

**Associated Legal Designations - None recorded**

**Other Statuses and Cross-References**

| | |
|---|---|
| NRHE to HER HE HOD UID for Monuments - 377264 | Active |
| SHINE Candidate (Possible) | Active |
| Original Record Number - 07382 | Active |

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 6247 5395

**Administrative Areas**

Civil Parish Carlton, South Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

R1, St Matthew's Chapel (site of symbol only).
R2, The site of St Matthew's Chapel is situated 49 chains SW of St Mary's Church, the ground on which it stood is now cultivated and no trace remains. It was supposed to have been an ancient edifice but no date can be obtained.
6, The Chapel at Willingham, probably of All Saints, stood at the Wend of the green (Willingham Green: TL/627-/541-) and probably consisted only of a nave and chancel. The church is mentioned before 1095 and was possibly still in use in 1552. It was temporarily converted to an almshouse about 1580. The chapel was in ruins by 1750 when the walls survived to any height only at the Wend. The ruins were removed between 1807 and 1851.The supposed dedication to St Matthew is an error arising from a misinterpretation of early C16 wills which relate to Willingham in Papworth hundred.

***Sources***

(R1) Map: Ordnance Survey 1960. OS 6 inch map.
ID: SCB9012

(R2) Bibliographic reference: OS, RevONB, 1901, 11.
ID: SCB9885

(R3) Verbal communication: From the Secretary of the Cambridgeshire Antiquarian Society.
ID: SCB6691

(R4) Aerial Photograph: APs 76,059 137 - 138.
ID: SCB820

(5) Verbal communication: Colquhoun, F.D 1970s. Field Investigators Comments. , 6/2/78
ID: SCB60597, Location: NMRC, Swindon

(6) Bibliographic reference: Elrington, C.R. (ed) 1978. The Victoria County History of Cambridgeshire and the Isle of Ely. Volume 6.
ID: SCB14801, Location: HER

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| 07385 | Saint Mary's Church, Brinkley | Building |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| Church | Medieval to Modern - 1066 AD to 2050 AD | Extant Building, Flint |
| Chancel | 13th century to Modern - 1201 AD to 2050 AD | |
| Nave | 14th century to Modern - 1301 AD to 2050 AD | |
| Tower | 15th century to Modern - 1401 AD to 2050 AD | |
| Window | 14th century - 1301 AD to 1400 AD | |

***Monument Status and Scores***

**Associated Legal Designations**

| | | | |
|---|---|---|---|
| DCB147 Active 5 | Listed Building | 1331800 | Parish Church of St Mary |

**Other Statuses and Cross-References**

| | |
|---|---|
| NRHE to HER HE HOD UID for Monuments - 871585 | Active |
| SHINE Candidate (No) | Active |
| Original Record Number - 07385 | Active |

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 629 548

**Administrative Areas**

Civil Parish Brinkley, East Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

1. Perpendicular and C19. Built of flint. W tower perpendicular with flushing decoration at the base. Perpendicular brick porch - a rarity in Cambridgeshire but frequent in Essex. Chancel rebuilt in 1874, but the four-light E window is so typical of c.1300 and unlikely for a High Victorian architect that it must be accurate.
Monumental brass: 1521, Son and daughter of William Stuffield.

3. Church first recorded in the C12. Consists of a chancel, aisled and clerestoried nave, west tower and south porch. Chancel C13 but rebuilt several times. Nave rebuilt C14, tower and porch added C15. The pulpit and some pews are C17, other pews all C18. Church intensively restored in C19, the chancel being mostly rebuilt. Chancel arch enlarged. Some C14 stain glass survives in the chancel.

***Sources***


(1) Bibliographic reference: Pevsner, N. 1954. The Buildings of England: Cambridgeshire. , 1954,
ID: SCB17744, Location: HER

(2) Bibliographic reference: Le Strange, R. 1972. A Complete Descriptive Guide to British Monumental Brasses.
ID: SCB11968

(3) Bibliographic reference: Elrington, C.R. (ed) 1978. The Victoria County History of Cambridgeshire and the Isle of Ely. Volume 6. , 139-140
ID: SCB14801, Location: HER

(4) Index: 1941. National Building Record Index. , 10436
ID: SCB60593, Location: NMRC, Swindon

(5) Map: 1960. OS 6 inch map.
ID: SCB8922


***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| 07396 | Site of windmill, Weston Colville | Monument |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| Windmill | Medieval to 19th century - 1066 AD to 1900 AD | Documentary Evidence |

***Monument Status and Scores***

**Associated Legal Designations - None recorded**

**Other Statuses and Cross-References**

| | |
|---|---|
| SHINE Candidate (No) | Active |
| Original Record Number - 07396 | Active |

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 629 529

**Administrative Areas**

Civil Parish Weston Colville, South Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

R1, Windmill depicted 1612.

***Sources***

(R1) Cartographic materials: 1612. Plan of Weston Colville and Carlton.
ID: SCB4798, Location: MS Plans R,b,19

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| 07409 | Medieval buildings (site of), Carlton | Monument |

Medieval buildings indicated on a map of 1612, lying along a lane which has now disappeared.

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| Building | Medieval - 1066 AD to 1539 AD | Documentary Evidence |

***Monument Status and Scores***

**Associated Legal Designations - None recorded**

**Other Statuses and Cross-References**

| | |
|---|---|
| SHINE Candidate (No) | Active |
| Original Record Number - 07409 | Active |

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 646 517

**Administrative Areas**

Civil Parish Carlton, South Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

R1, Several buildings depicted 1612 but not on OS Maps. Lie along a lane which has now disappeared. Marked by red cross on map.

***Sources***

(R1) Map: 1612. Map of Weston Colville and Carlton.
ID: SCB4714, Location: MS Plans R b 19

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| 09066 | Cropmark enclosures, Carlton | Monument |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| Enclosure | Unknown date | Cropmark |

***Monument Status and Scores***

**Associated Legal Designations**

| | | | |
|---|---|---|---|
| DCB879 4 | Active | SHINE | Cropmark enclosures directly adjacent to Carlton wood, Carlton |

**Other Statuses and Cross-References**

| | |
|---|---|
| SHINE Candidate (Yes) | Active |
| Original Record Number - 09066 | Active |

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 655 526

**Administrative Areas**

Civil Parish Carlton, South Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

1. Enclosures. (A Spedding 30/04/1984, CUCAP AP RC8-EG 133 used).

***Sources***

(1) Aerial Photograph:
ID: SCB3419

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| 09135 | Undated circular enclosure west of Chalk Pit Farm, Brinkley | Monument |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| Enclosure | Unknown date | Cropmark |

***Monument Status and Scores***

**Associated Legal Designations**

| | | |
|---|---|---|
| DCB906 Active 4 | SHINE | Cropmarks showing an incomplete circular enclosure of unknown date, 250m west of Chalk Pit Farm, Brinkley |

**Other Statuses and Cross-References**

| | |
|---|---|
| NRHE to HER HE HOD UID for Monuments - 377161 | Active |
| SHINE Candidate (Yes) | Active |
| Original Record Number - 09135 | Active |

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 602 555

**Administrative Areas**

| | |
|---|---|
| Civil Parish | Brinkley, East Cambridgeshire, Cambridgeshire |

**Address/Historic Names - None recorded**

***Description***

1. Circular enclosure.(H Snape 21/12/1983, CUCAP AP RC8-EG 227 used).(Note on PRC: circle and linear feature)

2. The indicated area is situated on undulating chalk arable land circa 76.0m above OD. Perambulation proved negative and no finds of interest were made.

OS APs show cropmarks of a large sub circular enclosure (probably a beast fold), covering an area of circa 2 acres.

3-4. Visible on recent aerial imagery from 2023

***Sources***

(1) Aerial Photograph:
ID: SCB3493

(2) Verbal communication: RSC 1978. Field Investigator Comments.
ID: SCB60595, Location: NMRC, Swindon

(3) Website: Google Earth 2023. Google Earth Pro Imagery 2023.
ID: SCB83527, Location: Website

(4) Aerial Photograph: Google Earth 2022. Google Earth Pro Imagery from 2022.
ID: SCB76521

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| 09144 | Ring ditch, Carlton | Monument |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| Ring Ditch | Unknown date | Cropmark |

***Monument Status and Scores***

**Associated Legal Designations**

| | | | |
|---|---|---|---|
| DCB993 8 | Active | SHINE | Undated ring ditch visible as cropmark, 350m south of Glebe Farm Cottage, Brinkley |

**Other Statuses and Cross-References**

| | |
|---|---|
| SHINE Candidate (Yes) | Active |
| Original Record Number - 09144 | Active |

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 638 538

**Administrative Areas**

Civil Parish Carlton, South Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

1. Ring ditch. (A Spedding 25/04/1984, CUCAP AP BZK 89 used).

2. Visible on Google Earth Imagery from 2018. Ring ditch measures approximately 27m in diameter and may represent a post medieval feature.

***Sources***

(1) Aerial Photograph:
ID: SCB3516

(2) Aerial Photograph: Google Earth 2018. Google Earth Imagery 2018.
ID: SCB57190

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| 09147 | Enclosures and field system, Carlton | Monument |

Aerial photographs that perhaps show remnants of a strip field and Prehistoric enclosures

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| Enclosure | | Cropmark |
| Trackway | | Cropmark |
| Field Boundary | Medieval - 1066 AD to 1539 AD at some time | |

***Monument Status and Scores***

**Associated Legal Designations - None recorded**

**Other Statuses and Cross-References**

| | |
|---|---|
| NRHE to HER HE HOD UID for Monuments - 377284 | Active |
| SHINE Candidate (No) | Active |
| Original Record Number - 09147 | Active |

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 631 530

**Administrative Areas**

Civil Parish Carlton, South Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

1. Enclosures, lane.(A Spedding 25/04/1984, CUCAP AP BPO 15 used).
2. The NW-SE aligned double cropmark, cutting the south-westernmost enclosure appears to correspond to one of the strip field shown on the 1612 map extract. The map (found in Western Colville Parish file), indicates a considerable amount of the Medieval open field system of the parish still in existence, this central area shows a more varied field pattern, presumably at least in part the result of piecemeal enclosure and amalgamation nearer the settlement (Cushion, B. 18/04/02)

3. The complex lies on level boulder clay at present under plough. No features are visible on the ground and no finds have been reported from the area. St Joseph APs not available for examination

***Sources***

(1) Aerial Photograph: APs, 19/04/1974 BPO 14 - 16.
ID: SCB3861

(2) Unpublished document: Brian Cushion 2002. Document detailing new earthwork discoveries.
ID: SCB17755, Location: HER parish

(3) Unknown reference type: Cambridge Archaeological Unit Records.
ID: SCB63590, Location: Not in HER

(4) Verbal communication: Stevens, P.A. Field Investigator Comments. , 31/1/78
ID: SCB60592, Location: NMRC, Swindon

(5) Aerial Photograph: OS APs 76 059 089-90.
ID: SCB63654, Location: Not in HER

(6) Aerial Photograph: Google Earth 2018. Google Earth Pro Imagery from 2018.
ID: SCB66043

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| 09148 | Ring ditch and enclosures, Carlton | Monument |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| Ring Ditch | Unknown date | Cropmark |
| Enclosure | Unknown date | Cropmark |

***Monument Status and Scores***

**Associated Legal Designations**

| | | | |
|---|---|---|---|
| DCB912 6 | Active | SHINE | Cropmarks of rectilinear enclosures and an associated ring ditch, 420m east of Penny Farm, Carlton |

**Other Statuses and Cross-References**

| | |
|---|---|
| NRHE to HER HE HOD UID for Monuments - 377281 | Active |
| SHINE Candidate (Yes) | Active |
| Original Record Number - 09148 | Active |

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 619 547

**Administrative Areas**

Civil Parish Carlton, South Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

1. Ring ditch and enclosures. (CUCAP grid refTL/620-/547-).(A Spedding 25/04/1984, CUCAP AZX 77 used).
2. Estate worker Mr Chris Wright recalls hedges being removed from this location, suggesting the enclosures may be recent in date.

3. Cropmarks of a probable later prehistoric settlement visible on aerial photographs comprising a large irregular sub-rectagular enclosure sub-divided internally into four large areas with smaller enclosures and pits. Further enclosures are attached to the northern side and eastern end surrounding an existing large ring ditch. The These remains are centred at approximately TL 6196 5471, close to where authoritiy 1 above noted soilmarks.

6. The soil marks lie at the crest of a north-south ridge within a field named 'Big Allotment' according to farm workers. No evidence of desertion was found in the plough and no finds have been reported from the area.

No features are shown in the area on a late 18th century map. St Joseph's APs not available for consultation.

***Sources***


(1) Aerial Photograph: CUCAP APs, 10/11/1969 AZX 75 - 77.
ID: SCB3586, Location: CUCAP

(2) Verbal communication: Information from Len Eeles.
ID: SCB20411

(3) Aerial Photograph: English Heritage NMR 27008_031-039 14-JUN-2011.
ID: SCB63643, Location: NMRC, Swindon

(4) Aerial Photograph: English Heritage St Joseph's APs AZX 75-77 10.11.69.
ID: SCB63644, Location: NMRC, Swindon

(5) Cartographic materials: Map 179 Carlton.
ID: SCB63645

(6) Verbal communication: Stevens, P.A. Field Investigator Comments. , 28/1/78
ID: SCB60592, Location: NMRC, Swindon

(7) Website: Esri 2020. World Imagery Wayback 08/12/20. https://livingatlas.arcgis.com/wayback/.
ID: SCB95508, Location: Website

(8) Website: Historic England 2022. Historic England Aerial Photograph Explorer https://historicengland.maps.arcgis.com/apps/webappviewer/index.html?id=2626ed0c37484d96b8954dd33187084e. https://historicengland.maps.arcgis.com/apps/webappviewer/index.html?id=2626ed0c37484d96b8954dd33187084e. , Aerial Photo - 27008_031
ID: SCB74356, Location: Website

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| 09320 | Ring ditch and other cropmarks, Carlton | Monument |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| Ring Ditch | Unknown date | Cropmark |
| Linear Feature | Unknown date | Cropmark |
| Trackway? | Unknown date | Cropmark |
| Ditch | | Cropmark |
| Field Boundary | Post Medieval - 1540 AD? to 1900 AD | Cropmark |
| Boundary Ditch | Post Medieval - 1540 AD? to 1900 AD | Cropmark |

***Monument Status and Scores***

**Associated Legal Designations - None recorded**

**Other Statuses and Cross-References**

| | |
|---|---|
| SHINE Candidate (No) | Active |
| Original Record Number - 09320 | Active |

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 581 561

**Administrative Areas**

Civil Parish Carlton, South Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

1. Ring ditch. (A Spedding 21/11/1983, CUCAP AP RS 60 used). Note: PRC gives grid ref TL/582-/562- and, in addition to the ring ditch, also lists linear features, possible trackway.

2-3. A ring ditch of possible Bronze Age date, but may be later in origin, is visible on aerial photographs as cropmarks and was mapped as part of the East Cambridgeshire Aerial Investigation and Mapping project (ECB6189). Located in a field south of Brinkley Road and bounded by Heath Belt, Black Belt and Footpath belt, centred at TL 58180 56140, a subcircular ring ditch about 3 metres in diameter encloses a circular internal area about 15 metres in diameter. From its SE corner a curvilinear ditch about 2.5 metres wide extends ESE about 61 metres. Some 60 metres to the north is a slightly curvilinear ditch up to 4 metres wide that extends about 170 metres WNW-ESE. The ring ditch and features described are visible on aerial photographs taken in 2019.

4. A probable post medieval linear field boundary ditch is visible on historic aerial photographs as cropmarks and was mapped as part of the East Cambridgeshire Aerial Investigation and Mapping project (ECB6189). Located in a field about 976 WNW of Lower Farm and centred at TL 58374 56326, a ditch between 4 and 9 metres wide extends SW (perpendicular) from Brinkley Road about 411 metres. No field boundary is depicted on the 1885 1st Edition OS map.

***Sources***

(1) Aerial Photograph:
ID: SCB4001

(2) Geospatial data: East Cambridgeshire AIM 2019. OS/96170 V 239 16-JUN-1996.
ID: SCB68726

(3) Geospatial data: East Cambridgeshire AIM 2019. Next Perspectives APGB Imagery TL5856 24-JAN-2019.
ID: SCB68727

(4) Geospatial data: East Cambridgeshire AIM 2019. OS/76059 V 220 24-MAY-1976.
ID: SCB68741

***Finds - None recorded***

***Associated Events/Activities***

ECB6189 Aerial Investigation Mapping Project, East Cambridgeshire (Event - Survey. Ref: P7767)

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| 10342 | Saint Peter's Church, Carlton | Building |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| Church | Medieval to Modern - 1066 AD to 2050 AD | Extant Building, Brick, Stone, Wood, Wood |
| Nave | 12th century to Modern - 1101 AD to 2050 AD | |
| Chancel | 15th century to Modern - 1401 AD to 2050 AD | |
| Bellcote | 19th century to Modern - 1801 AD to 2050 AD | |
| Roof | 15th century to Modern - 1401 AD to 2050 AD | |

***Monument Status and Scores***

**Associated Legal Designations**

| | | | | |
|---|---|---|---|---|
| DCB438 6 | Active | Listed Building | 1127132 | Church of St Peter |

**Other Statuses and Cross-References**

| | |
|---|---|
| NRHE to HER HE HOD UID for Monuments - 377308 | Active |
| SHINE Candidate (No) | Active |
| Original Record Number - 10342 | Active |

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 6418 5296

**Administrative Areas**

Civil Parish Carlton, South Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

The church is built of field stones, with brick and stone dressings. It comprises only a nave with a S porch and a chancel. The thick nave walls probably date from C12, and the spirally carved shafts reused as window mullions may come from a Norman doorway. The S doorway and 2 S windows of the nave are probably C14. New N and W windows were inserted into the nave in C15, when the nave roof was also reworked. The timber-framed S porch is much reconstructed, but was originally C17.The church was reconstructed in C19 (1885) under F J Smith when a Gothic style bell cote was built. It now contains 2 bells, both with black letter inscriptions, probably cast in C16 (1500) in Bury St Edmunds C15 rood-screen was reused to form a vestry in the nave.

3. Both bells - 15th century, Bury St Edmunds' foundry

***Sources***


(1) Bibliographic reference: Elrington, C.R. (ed) 1978. The Victoria County History of Cambridgeshire and the Isle of Ely. Volume 6. , p. 156
ID: SCB14801, Location: HER

(2) Bibliographic reference: Pevsner, N. 1954. The Buildings of England: Cambridgeshire. , 1970, 313
ID: SCB17744, Location: HER

(3) Index: Council for the Care of Churches 2005. Schedule of Listed Bells in Diocese of Ely.
ID: SCB19765

(4) Material archive: Archaeological Solutions 2004. Carlton Rise, Melbourn. DeepStore Barcode B000001615257, 10112
ID: SCB30593, Location: Off-site store

(4) Material archive: Archaeological Solutions 2004. Carlton Rise, Melbourn. Context 1004, 10112
ID: SCB30593, Location: Off-site store

(4) Material archive: Archaeological Solutions 2004. Carlton Rise, Melbourn. Site Code AS 831, 10112
ID: SCB30593, Location: Off-site store

(5) Cartographic materials: Ordnance Survey 1982. OS 1:10000.
ID: SCB63262

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| 11488 | Enclosures and linear features, Brinkley | Monument |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| Enclosure | Unknown date | Cropmark |
| Linear Feature | Unknown date | Cropmark |

***Monument Status and Scores***

**Associated Legal Designations**

| | | | |
|---|---|---|---|
| DCB895 4 | Active | SHINE | Cropmarks of enclosures and linear features, which are all probably pre-enclosure features, directly east of Penny Farm, Brinkley |

**Other Statuses and Cross-References**

| | |
|---|---|
| SHINE Candidate (Yes) | Active |
| Original Record Number - 11488 | Active |

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 6179 5503

**Administrative Areas**

Civil Parish Brinkley, East Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

1. Cropmarks of enclosures and linear features which are all probably pre-enclosure features, including headlands. Smaller enclosures are situated in a small stream valley. Extends into TL 65 NW. Sketch plotted on to 1:10,000 overlay.

***Sources***

(1) Aerial Photograph: OS APs, 76-059 136.
ID: SCB9107

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| 12037 | Lophams Hall Park, Carlton | Park and Garden |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| Park | 15th century - 1401 AD to 1500 AD | Documentary Evidence, Placename Evidence |
| Park Pale | 15th century - 1401 AD to 1500 AD | Earthwork |

***Monument Status and Scores***

**Associated Legal Designations - None recorded**

**Other Statuses and Cross-References**

| | |
|---|---|
| SHINE Candidate (No) | Active |
| Cambridgeshire Gardens Trust - 200 | Active |
| Original Record Number - 12037 | Active |

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 6511 5183

**Administrative Areas**

Civil Parish Carlton, South Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

1. Lophams Hall - moat and small garden? Small garden survives
2. There is only one currently known reference to the park at Lophams Manor in Carlton. This reference gives a spot date of 1417. However, the approximate position of the park can easily be located on an excellent early map of the area, by both park-related field names and field boundaries, and there is also a possible remnant of a park pale still extant (see appendix 21). The park appears to have been directly in contact with the manor house and chapel and may also have included parts of Lophams Wood, with a possible size of between 80 and 130 acres.

***Sources***

(1) Unpublished document: Way, T. 1998. Cambridgeshire Parks & Gardens Survey.
ID: SCB15975, Location: HER

(2) Bibliographic reference: Way, T. 1997. A Study of the Impact of Imparkment on the Social Landscape of Cambridgeshire and Huntingdonshire from c1080 to 1760. British Archaeological Report British Series 258, p262, park 79
ID: SCB18038, Location: HER

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| 12038 | The Rectory, Carlton | Park and Garden |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| Garden | Unknown date | Documentary Evidence |

***Monument Status and Scores***

**Associated Legal Designations - None recorded**

**Other Statuses and Cross-References**

| | |
|---|---|
| SHINE Candidate (No) | Active |
| Original Record Number - 12038 | Active |

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 642 528

**Administrative Areas**

Civil Parish Carlton, South Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

Grounds around Carlton Rectory: informal? Lawns

***Sources***

Unpublished document: Cambridgeshire Parks and Gardens Survey.
ID: SCB15973

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| 12039 | Carlton Grange | Park and Garden |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| Garden | Post Medieval - 1540 AD to 1900 AD | Documentary Evidence |
| House | 19th century - 1801 AD to 1900 AD | Documentary Evidence |

***Monument Status and Scores***

**Associated Legal Designations - None recorded**

**Other Statuses and Cross-References**

| | |
|---|---|
| NRHE to HER HE HOD UID for Monuments - 504325 | Active |
| SHINE Candidate (Possible) | Active |
| Original Record Number - 12039 | Active |

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 600 548

**Administrative Areas**

Civil Parish Carlton, South Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

1. Carlton Grange - gardens? Little left.

2. House, built in the first half of the 19th century.

***Sources***


(1) Unpublished document: Way, T. 1998. Cambridgeshire Parks & Gardens Survey.
ID: SCB15975, Location: HER

(2) Index: 1941. National Building Record Index. , 10114
ID: SCB60593, Location: NMRC, Swindon


***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| 12333 | Gardens of Brinkley Hall | Park and Garden |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| Garden | | Documentary Evidence |
| Avenue (Landscape Feature) | 19th century - 1801 AD to 1900 AD | Botanical Feature |
| Lawn | 19th century - 1801 AD to 1900 AD | Botanical Feature |
| Formal Garden | 19th century - 1801 AD to 1900 AD | Botanical Feature |
| Kitchen Garden | 19th century - 1801 AD to 1900 AD | Botanical Feature |
| Glasshouse | 19th century - 1801 AD to 1900 AD | Documentary Evidence |
| Temperate House | 19th century - 1801 AD to 1900 AD | Documentary Evidence |

***Monument Status and Scores***

**Associated Legal Designations - None recorded**

**Other Statuses and Cross-References**

| | |
|---|---|
| SHINE Candidate (Possible) | Active |
| Cambridgeshire Gardens Trust - 142 | Active |
| Original Record Number - 12333 | Active |

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 629 549

**Administrative Areas**

Civil Parish Brinkley, East Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

1. "The Hall", Brinkley: grounds, ponds, planting. Nice formal gardens (small) and grounds and lawn

2. Brinkley Hall is situated within a park of some 31 acres and incorporates parts of a smaller house of the 17th and 18th centuries, to which a new front block of brick, five bays long, was added in c.1800; subsequent to which date there have been minor alterations and additions. The stuccoed south front is of five bays and two storeys, while the red brick west front is of three bays. In 1951 the whole was described as a fine Georgian Country House with pleasant views towards the parish church' in a sales catalogue. The Park was not laid out until after the enclosure of the parish in 1811-16, and a sales catalogue of the Hall for 1816 lists the 'Mansion' as adjoining 'two enclosures of most productive meadow land'. By 1951 the park contained 31 acres including a wide lawn with flower beds and herbaceous borders to the west of the house, a walled garden (with soft fruit), a lime avenue to the west onto the Brinkley road, and a sweeping driveway terminating on the south side of the house. The Park also contains the remains of an icehouse (see RN 07398) and adjoins the important moated site of the 'Chantry' just over the parish border (see RN 01162). In 1990 a Cambridgeshire County Council study described the Park as a 'local feature' of some importance, although the 'chestnut' avenue was decaying (CCC 1990). An old orchard still exists to the west of the Hall, and an ancient oak survives next to the orchard (CCC Parklands Survey files 1984). There are attractive photographs of the avenue and walled gardens in the 1951 sales catalogue (CRO 515/SP2139).

3. William Frost purchased the estate c.1800 and built Brinkley Hall (see RN 07405) incorporating parts of a smaller house. It is likely that Frost created the park the lies to the north of the Hall. The hall has two approaches, by a chestnut tree avenue to the west and a short drive from the church to the south. To the west of the hall is a lawn with formal gardens leading to the avenue. Wrought iron gates lead to the walled kitchen garden that includes standard and walled fruit trees, separated by gravel paths and box hedging. The 1886 Ordnance Survey map shows a range of glass and plant houses, apple store and tool shed. There is an ice house to the northwest of the house, near the northern boundary of the park (see RN 07398).

***Sources***

(1) Unpublished document: Way, T. 1998. Cambridgeshire Parks & Gardens Survey.
ID: SCB15975, Location: HER

(2) Unpublished document: Way, T. 1999. Historic Parks and Gardens in Cambridgeshire. , 22
ID: SCB21125, Location: HER digital library

(3) Bibliographic reference: Cambridgeshire Garden Trust 2000. The Gardens of Cambridgeshire: A Gazetteer. , 85
ID: SCB21348, Location: HER Library

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| CB14907 | Saint George's Church, Six Mile Bottom | Building |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| Church | Modern - 1901 AD to 2050 AD | Extant Building |

***Monument Status and Scores***

**Associated Legal Designations**

| | | | |
|---|---|---|---|
| DCB780 Active 4 | Listed Building | 1391541 | Church of St George |

**Other Statuses and Cross-References**

| | |
|---|---|
| SHINE Candidate (No) | Active |

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 5808 5680

**Administrative Areas**

| | |
|---|---|
| Civil Parish | Brinkley, East Cambridgeshire, Cambridgeshire |

**Address/Historic Names - None recorded**

***Description***

1. Built in 1933, just within Brinkley parish, annexed to the parish of Little Wibraham.

***Sources***

(1) Bibliographic reference: Elrington, C.R. (ed) 1978. The Victoria County History of Cambridgeshire and the Isle of Ely. Volume 6.
ID: SCB14801, Location: HER

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| CB15159 | WWII Airfield: Wratting Common | Monument |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| Military Airfield | World War II - 1939 AD to 1945 AD | Destroyed Monument |
| Hangar | World War II - 1939 AD to 1945 AD | Destroyed Monument |

***Monument Status and Scores***

**Associated Legal Designations - None recorded**

**Other Statuses and Cross-References**

| | |
|---|---|
| NRHE to HER HE HOD UID for Monuments - 1432136 | Active |
| SHINE Candidate (No) | Active |

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 64062 50215

**Administrative Areas**

| | |
|---|---|
| Civil Parish | West Wickham, South Cambridgeshire, Cambridgeshire |
| Civil Parish | West Wratting, South Cambridgeshire, Cambridgeshire |
| Civil Parish | Weston Colville, South Cambridgeshire, Cambridgeshire |

**Address/Historic Names - None recorded**

***Description***

WW2 airfield, bomber; DP camp, now agriculture. Also hangars (2x T2s, 1x BI) @ TL6350.

1. Originally known as RAF West Wickham, first occupied from 30th April 1943. First squadron arrived May 1943 (90th Squadron). Bomber command site, also used for storage of Horsa gliders. Total personnel complement 1,348. Report of an accident in which a Stirling crash landed 200yards from the temporary sick quarters.

90 Squadron moved on in October 1943 and in November Stirlings frm 1651 Conversion Unit occupied the site. Total personnel complement 1,615. From December became a Conversion Base with three wings - SHO, Training and Servicing. New buildings included a permanent sick quarters, a gym, photography block, education block, squash court, civilian repaor organisation hanger, machine gun range, new briefing room and rest room. 1651 CU left the site November 1944.

195 Squadron arrived November 1944. Personnel 1.409. Site began demob process July 1945. By 1946 much of the site had been disbanded, however, Site No 2 was to be used to house German prisoners who were to continue the disbanding of the site. 76 of whom arrived April 1946 until June.

Memorial place close to the entrance of Weston Woods Farm in 1989.

2. A former World War Two military airfield, opened in 1943 and closed in 1946. The airfield consisted of three concrete runways and T2 and B1 type aircraft hangars (the hangars were reportedly still extant in 2000). The wartime role of the airfield was as an operational airfield for 3 Group Royal Air Force Bomber Command. There was temporary accommodation for 2125 male and 348 female personnel. the airfield had initially been named West Wickham, but was renamed Wratting Common to avoid confusion with another similarly named airfield. The main units using the airfield were 90 and 195 Squadrons. The site is now used for agricultural purposes.

3. Wratting Common Airfield, Cambridgeshire, TL 645 500

4. The cropmark outline of the airfield's most northerly hangar can be seen on EH Reconnaissance aerial photographs taken in 2010. This is situated to the west of Gover's Grove at TL 6442 5113.

***Sources***

(1) Website: Manning, C & Pearson R 2012. History of RAF Wratting Common. http://www.wcnhistory.org.uk/index.html.
ID: SCB59883

(2) Bibliographic reference: Bowyer, M.J.F. 2000. "Action Stations revisited: the complete history of Britain's military airfields" No 1 Eastern England.
ID: SCB60677

(3) Bibliographic reference: Willis, S. & Holliss, B. 1990. Military Airfields in the British Isles 1939-1945.
ID: SCB60661, Location: Not in HER

(4) Aerial Photograph: English Heritage NMR 26829_045-048 09-JUL-2010.
ID: SCB63649, Location: NMRC, Swindon

(5) Geospatial data: Pillbox Study Group 2020. Extended defence of Britain community project. , e21847
ID: SCB63056

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| MCB16610 | Keeper's cottage, Six Mile Bottom | Building |

***Classification***

| Monument Types and Dates | Building Materials/Evidence |
|---|---|
| Crossing Keepers Cottage 19th century to Unknown - 1848 AD to | Extant Building |

***Monument Status and Scores***

**Associated Legal Designations - None recorded**

**Other Statuses and Cross-References**

SHINE Candidate (No) Active

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 5791 5684

**Administrative Areas**

Civil Parish Little Wilbraham, South Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

1. Built for the Newmarket and Chesterford line in c. 1848. The characteristic triangular pediment is visible at the end nearer the road. An unusual feature is that the upper of the two storeys is at rail level.

***Sources***

(1) Bibliographic reference: Balchin, N. and Filby, P. 2001. A Guide to the Industrial Archaeology of Cambridgeshire & Peterborough. , E 25, p. 31
ID: SCB19119, Location: HER Library: PostMed Cambs

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| MCB19154 | Medieval woodland boundary | Monument |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| Wood Bank | Medieval - 1066 AD to 1539 AD | Earthwork |

***Monument Status and Scores***

**Associated Legal Designations**

| | | | |
|---|---|---|---|
| DCB885 2 | Active | SHINE | Medieval earthwork enclosures, field system and woodland boundary,Great Covens Wood, on Great Coven's Wood, Western Colville |

**Other Statuses and Cross-References**

| | |
|---|---|
| SHINE Candidate (Yes) | Active |

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 6241 5328

**Administrative Areas**

| | |
|---|---|
| Civil Parish | Weston Colville, South Cambridgeshire, Cambridgeshire |

**Address/Historic Names - None recorded**

***Description***

1. Medieval woodland boundary comprising a bank a ditch which extends the whole E-W length of Great Coven's Wood. The bank is shown on a parish map of 1612 and commences at the northern corner of the moat (SAM33267).

***Sources***

(1) Unpublished report: Cushion, B. 2010. An archaeological earthwork survey of ancient woodland in Weston Colville.
ID: SCB21613, Location: LibraryLink

***Finds - None recorded***

***Associated Events/Activities***

| | |
|---|---|
| ECB3396 | Archaeological earthwork survey of ancient woodland, Weston Colville (Event - Survey) |

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| MCB19155 | Earthwork enclosures and possible medieval field syste | Monument |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| Field System | Medieval - 1066 AD to 1539 AD | Earthwork |
| Enclosure | Medieval - 1066 AD to 1539 AD | Earthwork |

***Monument Status and Scores***

**Associated Legal Designations**

| | | |
|---|---|---|
| DCB885 Active 2 | SHINE | Medieval earthwork enclosures, field system and woodland boundary,Great Covens Wood, on Great Coven's Wood, Western Colville |

**Other Statuses and Cross-References**

SHINE Candidate (Yes) Active

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 6222 5317

**Administrative Areas**

Civil Parish Weston Colville, South Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

1. A complex series of enclosures were identified during an earthwork survey in 2010. Their relationship to the medieval moated site (SAM 33267) indicates that they are most likely a series of small fields directly associated with the manor and pre-date the woodland.

***Sources***

(1) Unpublished report: Cushion, B. 2010. An archaeological earthwork survey of ancient woodland in Weston Colville.
ID: SCB21613, Location: LibraryLink

***Finds - None recorded***

***Associated Events/Activities***

ECB3396 Archaeological earthwork survey of ancient woodland, Weston Colville (Event - Survey)

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| MCB19159 | Medieval wood banks, Lower Wood, Weston Colville | Monument |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| Wood Bank | Medieval to 19th century - 1066 AD to 1900 AD | Earthwork |

***Monument Status and Scores***

**Associated Legal Designations**

| | | |
|---|---|---|
| DCB105 Active 45 | SHINE | Medieval wood banks, Lower Wood, Weston Colville |

**Other Statuses and Cross-References**

| | |
|---|---|
| SHINE Candidate (Yes) | Active |

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 6246 5286

**Administrative Areas**

Civil Parish Weston Colville, South Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

1. A well-defined linear feature in the north-east of the wood and similar features to the south appear to be former wood banks. Other features, considered to be modern, were also noted in the wood.
2.The features to the south are clearly visible on LiDAR imagery dated to 2016. Features are also visible to the southwest in areas that were not covered by the initial earthwork survey.

***Sources***

(1) Unpublished report: Cushion, B. 2010. An archaeological earthwork survey of ancient woodland in Weston Colville.
ID: SCB21613, Location: LibraryLink

(2) Geospatial data: Environment Agency 2016. LIDAR composite digital terrain model (DTM) 1m - Raster image. Raster image.
ID: SCB54950, Location: GIS

***Finds - None recorded***

***Associated Events/Activities***

ECB3396 Archaeological earthwork survey of ancient woodland, Weston Colville (Event - Survey)

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| MCB20423 | War Memorial, Carlton | Monument |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| War Memorial | 20th century - 1901 AD to 2000 AD | Portland Stone, Extant Structure |
| High Cross | 20th century - 1901 AD to 2000 AD | Portland Stone, Extant Structure |

***Monument Status and Scores***

**Associated Legal Designations**

| | | | |
|---|---|---|---|
| DCB105 Active 92 | Listed Building | 1427547 | Carlton War Memorial |

**Other Statuses and Cross-References**

SHINE Candidate (No) Active

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 6418 5301

**Administrative Areas**

Civil Parish Carlton, South Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

1. War memorial commemmorating those that lost their lives in the Great War (10 names) and the Second World War (2 names). The memorial was erected after the First World War. It comprises a simple Portland stone cross with chamfered edges, supported by a small square foot which rises from a tapered plinth. The base of the memorial is surrounded by a concrete kerb which enclosues a flower bed.
Inscription:
Front face of plinth: ERECTED/ TO THE MEMORY OF/ THE MEN OF CARLTON. FAITHFUL UNTO DEATH. 1914-1918 (10 NAMES).
Rear face of plinth: 1939-1945 (2 NAMES).
In 2009 the memorial was cleaned and the lettering restored.

***Sources***

(1) Website: Imperial War Museums 2014. Imperial War Museums War Memorial online database. ID: SCB46049

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| MCB24471 | Railway: Cambridge, Newmarket & Bury branch | Monument |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| Railway | 20th century - 1901 AD to 2000 AD | Documentary Evidence |

***Monument Status and Scores***

**Associated Legal Designations - None recorded**

**Other Statuses and Cross-References**

| | |
|---|---|
| NRHE to HER HE HOD UID for Monuments - 1366818 | Active |
| SHINE Candidate (No) | Revoked |

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 5573 5953

**Administrative Areas**

Civil Parish Cambridge, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

1. Railway line introduced from Cambridge to Newmarket built in the start of the 20th century to replace an earlier line direct from Cambridge station.

2., The Cambridge and Newmarket Railway, with branches to Ely (The Newmarket Railway) and Bury St Edmunds, was first proposed in 1846 as the Chesterford and Newmarket Railway, the extensions being authorised in 1847. The early history of the line is complicated by the rivalry between the independent owners, the East Counties Railway, and the Great Northern Railway. Capital costs were high and investment poor, the line running at costs which were impossible to bear. Eventually in 1851, agreement was reached with the ECR by which, when Cambridge was reached, the ECR would take over the whole line. The branch was completed in 1851 to Cambridge via Fulbourne, the Six Mile Bottom - Great Chesterford section being closed and powers to dismantle this section being obtained in 1858, (see Linear 1843). In 1854 the extension to Bury St Edmunds was completed, but the Ely and Newmarket was not built until 1879,

***Sources***

(1) Verbal communication: CCC HET 2016. Observations made from 1st Edition Ordnance Survey map (1885). , 16/01/2018
ID: SCB47894

(2) Bibliographic reference: Gordon, D.I. 1977. Regional History of Railways of Great Britain 5. Eastern Counties.
ID: SCB13860

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| MCB25763 | Old Chalk Pit, Carlton | Monument |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| Chalk Pit | 19th century - 1801 AD to 1900 AD | Documentary Evidence |

***Monument Status and Scores***

**Associated Legal Designations - None recorded**

**Other Statuses and Cross-References**

| | |
|---|---|
| SHINE Candidate (No) | Active |

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 6169 5406

**Administrative Areas**

| | |
|---|---|
| Civil Parish | Carlton, South Cambridgeshire, Cambridgeshire |

**Address/Historic Names - None recorded**

***Description***

1. Site of an 'old' chalk pit illustrated on the 1st edition Ordnance Survey map dated to 1885.

***Sources***

(1) Verbal communication: Donnelly-Symes, B. 2017. Observations made from 1st Edition Ordnance Survey map (1885).
ID: SCB48316

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| MCB26939 | Lower Farm, Brinkley | Building |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| Farm | 19th century - 1801 AD to 1900 AD | Documentary Evidence |

***Monument Status and Scores***

**Associated Legal Designations - None recorded**

**Other Statuses and Cross-References**

SHINE Candidate (No) Active

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 5925 5608

**Administrative Areas**

Civil Parish Brinkley, East Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

1. Site of Lower Farm illustrated on the 1st edition Ordnance Survey map dated to 1885. The original farm buildings appear to be extant.

U shaped courtyard plan with farmhouse to the east. Now converted to private residences

***Sources***

(1) Verbal communication: Donnelly-Symes, B. 2017. Observations made from 1st Edition Ordnance Survey map (1885).
ID: SCB48316

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| MCB26964 | World War II temporary camps, RAF Wratting Commor | Monument |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| Temporary Camp | World War II - 1939 AD to 1945 AD | Documentary Evidence |

***Monument Status and Scores***

**Associated Legal Designations - None recorded**

**Other Statuses and Cross-References**

SHINE Candidate (No) Active

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 6333 5162

**Administrative Areas**

Civil Parish Weston Colville, South Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

1. Series of temporary camps associated with RAF Wratting Common during World War II. The camps were located to the north of the airfied base and included the following:

Operational Block Site
Site No 2 Communal camp
Site No 3 Sick Quarters
Site No 4 unidentified
Site No 5 unidentified
Site No 6 unidentified
Site No 7 unidentified
Site No 8 unidentified
Site No 9 unidentified
Site No 10 WAAF quarters
Site No 11 WAAF quarters
Site No 12 unidentified

***Sources***

(1) Website: Manning, C & Pearson R 2012. History of RAF Wratting Common. http://www.wcnhistory.org.uk/index.html.
ID: SCB59883

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| MCB27247 | Cropmark enclosure, Brinkley | Monument |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| Enclosure | Unknown date | Cropmark |

***Monument Status and Scores***

**Associated Legal Designations - None recorded**

**Other Statuses and Cross-References**

| | |
|---|---|
| NRHE to HER HE HOD UID for Monuments - 1603818 | Active |
| SHINE Candidate (Probable) | Active |

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 6065 5531

**Administrative Areas**

Civil Parish Brinkley, East Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

1. The cropmark of a possible Iron Age or Roman rectilinear enclosure visible on HE Reconnaissance aerial photographs to the southwest of Westley Waterless at TL 6058 5522 taken 10th June 2008. Three sides of the cropmark are visible with the northwest side visible in its entirety. To the north are cropmarks of part of a possible enclosure most likely to be of a similar date.

***Sources***

(1) Aerial Photograph: Historic England 2008. NMR 26020_009-019 10-JUN-2008.
ID: SCB61221, Location: NMRC, Swindon

(2) Verbal communication: CCHET 2017. Observations made from the 2017 CCC Aerial Photographs.
ID: SCB54312, Location: GIS

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| MCB29039 | Possible cropmarks features, Carlton | Monument |

***Classification***

| Monument Types and Dates | Building Materials/Evidence |
|---|---|
| Enclosure | Cropmark |

***Monument Status and Scores***

**Associated Legal Designations - None recorded**

**Other Statuses and Cross-References**

| | |
|---|---|
| NRHE to HER HE HOD UID for Monuments - 1623620 | Active |
| SHINE Candidate (No) | Active |

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 6077 5484

**Administrative Areas**

Civil Parish Carlton, South Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

1. The cropmarks of a possible Iron Age or Roman enclosure can be seen on Historic England Reconnaissance aerial photographs taken in June 2015. This fragmentary cropmark is situated at TL 6077 5485. This is one of a number of enclosures in the vicinity

***Sources***

(1) Aerial Photograph: English Heritage 29410_008-011 30-JUN-2015.
ID: SCB63639, Location: NMRC, Swindon

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| MCB29042 | The Gables and the Old Stores, Brinkley | Building |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| House | 20th century - 1901 AD to 2000 AD | Extant Structure |
| Shop | 20th century - 1901 AD to 2000 AD | Extant Structure |

***Monument Status and Scores***

**Associated Legal Designations - None recorded**

**Other Statuses and Cross-References**

| | |
|---|---|
| NRHE to HER HE HOD UID for Monuments - 504484 | Active |
| SHINE Candidate (No) | Active |

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 6293 5478

**Administrative Areas**

Civil Parish Brinkley, East Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

1. House, probable circa 1900, but containing a fragment of a house of 17th century date comprising one room on each floor with the first floor projecting on the north elevation. This part of the north elevation, which faces onto the churchyard, has a ground floor rebuilt in brick. The first floor is plastered and the wall is carried up into a gable where there are traces of simple pargetted panels. On the west side of the building a brick built wing projects to the south and contains a shop. This wing appears to be contemporary with the early 19th century shop front fitted in the south elevation. This is divided into three by panelled pilasters with a small cornice along the top.

***Sources***

(1) Index: 1941. National Building Record Index. , 10442
ID: SCB60593, Location: NMRC, Swindon

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| MCB30168 | Undated square enclosure, 250m south of 35 Weston Colville Road | Monument |

***Classification***

| Monument Types and Dates | Building Materials/Evidence |
|---|---|
| Enclosure | Cropmark |

***Monument Status and Scores***

**Associated Legal Designations**

| | | | |
|---|---|---|---|
| DCB101 | Active 19 | SHINE | Undated square enclosure, 250m south of 35 Weston Colville Road |

**Other Statuses and Cross-References**

| | |
|---|---|
| SHINE Candidate (Yes) | Active |

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 6255 5442

**Administrative Areas**

| | |
|---|---|
| Civil Parish | Brinkley, East Cambridgeshire, Cambridgeshire |

**Address/Historic Names - None recorded**

***Description***

1. Western half of square or rectilinear enclosure predating 19th century maps visible on Google Earth imagery from 2018. The enclosure measures 40m north-south and at least 65m east-west.

***Sources***

Aerial Photograph: Google Earth 2018. Google Earth Pro Imagery from 2018.
ID: SCB66043

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| MCB30169 | Undated square enclosure, 330m northwest of Penny Farm | Monument |

***Classification***

**Monument Types and Dates**

Enclosure

**Building Materials/Evidence**

Cropmark

***Monument Status and Scores***

**Associated Legal Designations**

DCB101 Active 20 SHINE — Undated square enclosure, 330m northwest of Penny Farm

**Other Statuses and Cross-References**

SHINE Candidate (Yes) — Active

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 6110 5510

**Administrative Areas**

Civil Parish Brinkley, East Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

1. Irregular enclosure predating 19th century maps visible on Google Earth imagery from 2018. The enclosure is aligned northwest to southeast and measures 85m northeast-southwest and 90m northwest-southeast.

***Sources***

Aerial Photograph: Google Earth 2018. Google Earth Pro Imagery from 2018.
ID: SCB66043

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| MCB30722 | A Second World War searchlight battery | Monument |

A Second World War searchlight battery is visible on historic aerial photographs and was mapped as part of the East Cambridgeshire Aerial Investigation and Mapping project (ECB6189).

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| Searchlight Battery | World War II - 1939 AD to 1945 AD | Levelled Earthwork, Demolished Building, Demolished Structure |
| Military Building | World War II - 1939 AD to 1945 AD | Demolished Building |
| Ring Ditch | World War II - 1939 AD to 1945 AD | Levelled Earthwork |
| Anti Aircraft Gun Emplacement | World War II - 1939 AD to 1945 AD | Levelled Earthwork |

***Monument Status and Scores***

**Associated Legal Designations - None recorded**

**Other Statuses and Cross-References**

SHINE Candidate (Unlikely) Active

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 5938 5610

**Administrative Areas**

Civil Parish Brinkley, East Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

1-3. A Second World War searchlight battery is visible on historic aerial photographs and was mapped as part of the East Cambridgeshire Aerial Investigation and Mapping project (ECB6189). Located in a field immediately east of Lower Farm and centred at TL 59437 56093, the battery comprises four C-shaped emplacements, a smaller slit trench or (machine gun?) emplacement along with the remains of five rectangular concrete building platforms of varying sizes, accessed by a roadway leading from Brinkley Road. Two of the C-shaped earthwork bank emplacements are side-by-side, each about 18 metres in diameter and each enclosing an internal area about 10 metres in diameter. Immediately south of these is a third C-shaped earthwork emplacement that appears to have been levelled or its construction never completed. Some 55 metres to the east is a larger C-shaped earthwork emplacement about 23 metres in diameter that encloses an internal area about 11 metres in diameter. About 27 metres NE of the 3 searchlight emplacements is a curvilinear slit trench some 6 metres long. To the NW of this are the concrete plinths for buildings. Built to a fairly standard design searchlight batteries contained pits for one or more searchlights, range finder and light anti-aircraft gun, as well as a power generator and often accommodation for crews. No evidence of the features are visible on aerial photographs taken in 2019.

***Sources***


(1) Geospatial data: East Cambridgeshire AIM 2019. US/7PH/GP/LOC187 PORT 13019 29-FEB-1944. ID: SCB68706

(2) Geospatial data: East Cambridgeshire AIM 2019. RAF/106G/UK/1490 RS 4159 09-MAY-1946. ID: SCB68707

(3) Aerial Photograph: East Cambridgeshire AIM 2019. Next Perspectives APGB Imagery TL5956 24-JAN-2019. ID: SCB68708


***Finds - None recorded***

***Associated Events/Activities***

ECB6189 Aerial Investigation Mapping Project, East Cambridgeshire (Event - Survey. Ref: P7767)

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| MCB31339 | A medieval or post medieval curvilinear trackway or boundary ditch | Monument |

A medieval or post medieval curvilinear trackway or boundary ditch is visible on historic aerial photographs as cropmarks and was mapped as part of the East Cambridgeshire Aerial Investigation and Mapping project (ECB6189).

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| Field Boundary | Medieval to 19th century - 1066 AD? to 1900 AD? | Cropmark |
| Trackway | Medieval to 19th century - 1066 AD? to 1900 AD? | Cropmark |

***Monument Status and Scores***

**Associated Legal Designations - None recorded**

**Other Statuses and Cross-References**

SHINE Candidate (Possible) Active

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 5904 5622

**Administrative Areas**

Civil Parish Carlton, South Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

1. A medieval or post medieval curvilinear trackway or boundary ditch is visible on historic aerial photographs as cropmarks and was mapped as part of the East Cambridgeshire Aerial Investigation and Mapping project (ECB6189). Located in a field immediately west of Lower Farm and centred at TL 59042 56220, a curving ditch up to 8 metres wide extends NW from Brinkley Road about 340 metres. No field boundary is depicted on the 1885 1st Edition OS map, so this may have been a trackway rather than a boundary ditch.

***Sources***

(1) Geospatial data: East Cambridgeshire AIM 2021. OS/76059 V 174 24-MAY-1976.
ID: SCB71073

***Finds - None recorded***

***Associated Events/Activities***

ECB6189 Aerial Investigation Mapping Project, East Cambridgeshire (Event - Survey. Ref: P7767)

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| MCB31533 | Undated ring ditch, 330m northwest of Willingham Hou | Monument |

***Classification***

**Monument Types and Dates** | **Building Materials/Evidence**

Ring Ditch | Cropmark

***Monument Status and Scores***

**Associated Legal Designations**

DCB102 Active SHINE 61 — Undated ring ditch, 330m northwest of Willingham House

**Other Statuses and Cross-References**

SHINE Candidate (Yes) — Active

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 6284 5431

**Administrative Areas**

Civil Parish — Brinkley, East Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

1. Ring ditch visible on aerial imagery from 2013. Measures approximately 12m in diameter.

***Sources***

Verbal communication: CHET 2016. Observations from 2013 CCC Aerial Photographs.
ID: SCB47636, Location: HER GIS

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| MCB31560 | Former school, Brinkley | Monument |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| School | 19th century - 1801 AD to 1900 AD | Documentary Evidence |

***Monument Status and Scores***

**Associated Legal Designations - None recorded**

**Other Statuses and Cross-References**

| | |
|---|---|
| SHINE Candidate (Possible) | Active |

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 6331 5445

**Administrative Areas**

Civil Parish Brinkley, East Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

1. Former school, recorded on Historic maps from Ordnance Survey first edition. Since demolished.

***Sources***

(1) Verbal communication: CCC HET 2016. Observations made from 1st Edition Ordnance Survey map (1885).
ID: SCB47894

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| MCB31562 | Former chimney, Brinkley | Monument |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| Chimney | 19th century - 1801 AD to 1900 AD | Documentary Evidence |

***Monument Status and Scores***

**Associated Legal Designations - None recorded**

**Other Statuses and Cross-References**

| | |
|---|---|
| SHINE Candidate (Possible) | Active |

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 6299 5468

**Administrative Areas**

Civil Parish Brinkley, East Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

1. Former chimney, recorded on Historic maps from Ordnance Survey first edition. Since demolished.

***Sources***

(1) Verbal communication: CCC HET 2016. Observations made from 1st Edition Ordnance Survey map (1885).
ID: SCB47894

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| MCB31563 | Former blacksmiths workshop, Brinkley | Monument |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| Blacksmiths Workshop | 19th century - 1801 AD to 1900 AD | Documentary Evidence |

***Monument Status and Scores***

**Associated Legal Designations - None recorded**

**Other Statuses and Cross-References**

| | |
|---|---|
| SHINE Candidate (Possible) | Active |

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 6281 5479

**Administrative Areas**

| | |
|---|---|
| Civil Parish | Brinkley, East Cambridgeshire, Cambridgeshire |

**Address/Historic Names - None recorded**

***Description***

1. Former blacksmiths workshop, recorded on Historic maps from Ordnance Survey first edition. Since demolished.

***Sources***

(1) Verbal communication: CCC HET 2016. Observations made from 1st Edition Ordnance Survey map (1885).
ID: SCB47894

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| MCB32485 | Cockerton's Farm, Brinkley | Monument |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| House | 19th century - 1801 AD to 1900 AD | Documentary Evidence |

***Monument Status and Scores***

**Associated Legal Designations - None recorded**

**Other Statuses and Cross-References - None recorded**

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 6501 5404

**Administrative Areas**

Civil Parish Brinkley, East Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

1. Farm recorded on Ordnance Survey first edition maps from c.1885. Farmhouse is extant.

***Sources***

(1) Verbal communication: CCC HET 2016. Observations made from 1st Edition Ordnance Survey map (1885).
ID: SCB47894

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| MCB32486 | New Farm, Brinkley | Monument |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| House | 19th century - 1801 AD to 1900 AD | Documentary Evidence |

***Monument Status and Scores***

**Associated Legal Designations - None recorded**

**Other Statuses and Cross-References - None recorded**

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 6372 5426

**Administrative Areas**

Civil Parish Brinkley, East Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

1. Farm recorded on Ordnance Survey first edition maps from c.1885. Farmhouse is extant.

***Sources***

(1) Verbal communication: CCC HET 2016. Observations made from 1st Edition Ordnance Survey map (1885).
ID: SCB47894

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| MCB32487 | Rose and Crown public house, Carlton | Building |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| Public House | 19th century - 1801 AD to 1900 AD | Documentary Evidence |

***Monument Status and Scores***

**Associated Legal Designations - None recorded**

**Other Statuses and Cross-References - None recorded**

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 6345 5418

**Administrative Areas**

Civil Parish Carlton, South Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

1. Farm recorded on Ordnance Survey first edition maps from c.1885. Extant.

***Sources***

(1) Verbal communication: CCC HET 2016. Observations made from 1st Edition Ordnance Survey map (1885).
ID: SCB47894

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| MCB32488 | Former windmill, Brinkley | Monument |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| Windmill | 19th century - 1801 AD to 1900 AD | Documentary Evidence |
| Corn Mill | 19th century - 1801 AD to 1900 AD | Documentary Evidence |

***Monument Status and Scores***

**Associated Legal Designations - None recorded**

**Other Statuses and Cross-References - None recorded**

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 6225 5504

**Administrative Areas**

Civil Parish Brinkley, East Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

1. former corn windmill recorded on Ordnance Survey first edition maps from c.1885.

***Sources***

(1) Verbal communication: CCC HET 2016. Observations made from 1st Edition Ordnance Survey map (1885).
ID: SCB47894

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| MCB32489 | The Poplars, Brinkley | Monument |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| House | 19th century - 1801 AD to 1900 AD | Documentary Evidence |

***Monument Status and Scores***

**Associated Legal Designations - None recorded**

**Other Statuses and Cross-References - None recorded**

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 6261 5500

**Administrative Areas**

Civil Parish Brinkley, East Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

1. House recorded on Ordnance Survey first edition maps from c.1885.

***Sources***

(1) Verbal communication: CCC HET 2016. Observations made from 1st Edition Ordnance Survey map (1885).
ID: SCB47894

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| MCB32629 | Carlton Hall Garden | Park and Garden |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| Garden | 19th century - 1801 AD to 1900 AD | Documentary Evidence |

***Monument Status and Scores***

**Associated Legal Designations - None recorded**

**Other Statuses and Cross-References - None recorded**

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 6475 5362

**Administrative Areas**

Civil Parish Carlton, South Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

1. small garden at Carlton Hall, including ponds of a former moat, structures and ornamental planting.

***Sources***

(1) Verbal communication: CCC HET 2016. Observations made from 1st Edition Ordnance Survey map (1885).
ID: SCB47894

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| MCB32957 | Former model farm at Carlton Grange, Carlton | Monument |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| Model Farm | 19th century - 1801 AD to 1900 AD | Demolished Structure |

***Monument Status and Scores***

**Associated Legal Designations - None recorded**

**Other Statuses and Cross-References - None recorded**

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 6013 5502

**Administrative Areas**

Civil Parish Carlton, South Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

1. Carlton Grange, former model farm location to the north of the village. The complex consisted of a range of stone structures for the house facing a regular enclosed courtyard of farming buildings. The farm buildings were gradually removed throughout the 20th century and the house finally removed by the end of the century.

2. LiDAR records significant disturbance beneath the current woodland.

3. Photograph of the former house.

4. Early 19th century map records a square enclosed courtyard at this location called Rennet Hall

***Sources***

(1) Verbal communication: CCC HET 2016. Observations made from 1st Edition Ordnance Survey map (1885).
ID: SCB47894

(2) Geospatial data: Environment Agency 2020. Environment Agency 1m resolution LiDAR Complete coverage mapping. Raster image.
ID: SCB66292, Location: GIS

(3) Website: 2024. Carlton Grange. https://www.carlton-cambridgeshire.org.uk/maps/carlton_grange.htm.
ID: SCB100631, Location: Website

(4) Cartographic materials: ANON 1808. Cambridge 23.
ID: SCB100632, Location: British Library

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| MCB32958 | Former Rood Hall, Carlton | Monument |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| House | 19th century - 1801 AD to 1900 AD | Demolished Structure |

***Monument Status and Scores***

**Associated Legal Designations - None recorded**

**Other Statuses and Cross-References - None recorded**

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 6378 5324

**Administrative Areas**

Civil Parish Carlton, South Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

1. Former Rood Hall recorded on Ordnance Survey historic maps. Demolished by start of 20th century.

***Sources***

(1) Verbal communication: CCC HET 2016. Observations made from 1st Edition Ordnance Survey map (1885).
ID: SCB47894

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| MCB32959 | Former school, Carlton | Building |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| School | 19th century - 1801 AD to 1900 AD | Extant Structure |

***Monument Status and Scores***

**Associated Legal Designations - None recorded**

**Other Statuses and Cross-References - None recorded**

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 6438 5341

**Administrative Areas**

Civil Parish Carlton, South Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

1. Former school recorded on Ordnance Survey historic maps. Now private residence

***Sources***

(1) Verbal communication: CCC HET 2016. Observations made from 1st Edition Ordnance Survey map (1885).
ID: SCB47894

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| MCB32960 | Former Axe & Saw public house, Carlton | Building |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| Public House | Post Medieval - 1540 AD to 1900 AD | Extant Structure |

***Monument Status and Scores***

**Associated Legal Designations**

| | | | | |
|---|---|---|---|---|
| DCB600 2 | Active | Listed Building | 1127131 | Hillcroft |

**Other Statuses and Cross-References - None recorded**

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 6428 5346

**Administrative Areas**

Civil Parish Carlton, South Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

1. Former public house recorded on Ordnance Survey historic maps. Now private residence

***Sources***

(1) Verbal communication: CCC HET 2016. Observations made from 1st Edition Ordnance Survey map (1885).
ID: SCB47894

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| MCB32961 | Rose Cottage, Carlton | Building |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| House | 19th century - 1801 AD to 1900 AD | Extant Structure |
| Post Office | 19th century - 1801 AD to 1900 AD | Extant Structure |

***Monument Status and Scores***

**Associated Legal Designations - None recorded**

**Other Statuses and Cross-References - None recorded**

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 6417 5344

**Administrative Areas**

Civil Parish Carlton, South Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

1. Rose Cottage recorded on Ordnance Survey historic maps, recorded as the post office. Now private residence

***Sources***

(1) Verbal communication: CCC HET 2016. Observations made from 1st Edition Ordnance Survey map (1885).
ID: SCB47894

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| MCB32962 | Former Norney's Farm, Carlton | Monument |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| Farm | 19th century - 1801 AD to 1900 AD | Demolished Structure |

***Monument Status and Scores***

**Associated Legal Designations - None recorded**

**Other Statuses and Cross-References - None recorded**

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 6498 5239

**Administrative Areas**

Civil Parish Carlton, South Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

1. Former Norney's Farm recorded on Ordnance Survey historic maps. Demolished by start of 20th century. Complex comprised a regular enclosed courtyard with a detached farmhouse to the west.

***Sources***

(1) Verbal communication: CCC HET 2016. Observations made from 1st Edition Ordnance Survey map (1885).
ID: SCB47894

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| MCB32963 | Church Farm, Carlton | Building |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| Farm | 19th century - 1801 AD to 1900 AD | Demolished Structure |

***Monument Status and Scores***

**Associated Legal Designations - None recorded**

**Other Statuses and Cross-References - None recorded**

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 6426 5301

**Administrative Areas**

Civil Parish Carlton, South Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

1. Church Farm recorded on Ordnance Survey historic maps. Complex comprised detached main farmhouse with regular E shaped courtyard to the west. The courtyard buildings have since been converted to private residences.

***Sources***

(1) Verbal communication: CCC HET 2016. Observations made from 1st Edition Ordnance Survey map (1885).
ID: SCB47894

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| MCB32964 | Gardens at Church Farm, Carlton | Park and Garden |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| Garden | 19th century - 1801 AD to 1900 AD | Documentary Evidence |

***Monument Status and Scores***

**Associated Legal Designations - None recorded**

**Other Statuses and Cross-References - None recorded**

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 6429 5299

**Administrative Areas**

Civil Parish Carlton, South Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

1. Church Farm recorded on Ordnance Survey historic maps. Complex comprised detached main farmhouse with regular E shaped courtyard to the west. The courtyard buildings have since been converted to private residences.

***Sources***

(1) Verbal communication: CCC HET 2016. Observations made from 1st Edition Ordnance Survey map (1885).
ID: SCB47894

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| MCB32965 | Cocksedge Farm, Carlton | Building |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| Farm | 19th century - 1801 AD to 1900 AD | Documentary Evidence |

***Monument Status and Scores***

**Associated Legal Designations - None recorded**

**Other Statuses and Cross-References - None recorded**

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 6388 5243

**Administrative Areas**

Civil Parish Carlton, South Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

1. Cocksedge Farm recorded on Ordnance Survey historic maps. Complex comprised U shaped farmyard with attached farmhouse. Largely extant.

***Sources***

(1) Verbal communication: CCC HET 2016. Observations made from 1st Edition Ordnance Survey map (1885).
ID: SCB47894

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| MCB32966 | Providence House, Carlton | Building |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| House | 19th century - 1801 AD to 1900 AD | Extant Structure |

***Monument Status and Scores***

**Associated Legal Designations - None recorded**

**Other Statuses and Cross-References - None recorded**

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 6265 5432

**Administrative Areas**

Civil Parish Carlton, South Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

1. Providence House recorded on Ordnance Survey historic maps. Extant.

***Sources***

(1) Verbal communication: CCC HET 2016. Observations made from 1st Edition Ordnance Survey map (1885).
ID: SCB47894

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| MCB32967 | Crick's Farm, Carlton | Building |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| Farm | 19th century - 1801 AD to 1900 AD | Documentary Evidence |

***Monument Status and Scores***

**Associated Legal Designations - None recorded**

**Other Statuses and Cross-References - None recorded**

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 6175 5436

**Administrative Areas**

Civil Parish Carlton, South Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

1. Crick's Farm recorded on Ordnance Survey historic maps. Complex comprised L shaped farmyard with attached farmhouse. Largely redeveloped

***Sources***

(1) Verbal communication: CCC HET 2016. Observations made from 1st Edition Ordnance Survey map (1885).
ID: SCB47894

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| MCB33021 | Cropmark remains of World War II hangar, Weston Colville | Monument |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| Rectilinear Enclosure | World War II - 1939 AD to 1945 AD | Cropmark |
| Hangar | World War II - 1939 AD to 1945 AD | Cropmark |

***Monument Status and Scores***

**Associated Legal Designations - None recorded**

**Other Statuses and Cross-References - None recorded**

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 6441 5115

**Administrative Areas**

Civil Parish Weston Colville, South Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

1-2. Substantial cropmark remains of a hangar recorded on aerial imagery. The structure is recorded on RAF aerial photographs from World War II.

***Sources***

(1) Website: Historic England 2022. Historic England Aerial Photograph Explorer https://historicengland.maps.arcgis.com/apps/webappviewer/index.html?id=2626ed0c37484d96b8954dd33187084e. https://historicengland.maps.arcgis.com/apps/webappviewer/index.html?id=2626ed0c37484d96b8954dd33187084e. , raf_58_463_v_5145
ID: SCB74356, Location: Website

(2) Website: Historic England 2022. Historic England Aerial Photograph Explorer https://historicengland.maps.arcgis.com/apps/webappviewer/index.html?id=2626ed0c37484d96b8954dd33187084e. https://historicengland.maps.arcgis.com/apps/webappviewer/index.html?id=2626ed0c37484d96b8954dd33187084e. , Aerial Photo - 26829_047
ID: SCB74356, Location: Website

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| MCB33027 | Carlton Hall | Monument |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| House | 19th century - 1801 AD to 1900 AD | Documentary Evidence |
| Farmyard | 19th century - 1801 AD to 1900 AD | Documentary Evidence |

***Monument Status and Scores***

**Associated Legal Designations - None recorded**

**Other Statuses and Cross-References - None recorded**

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 6479 5358

**Administrative Areas**

Civil Parish Carlton, South Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

1. Carlton Hall consisting of detached house with substantial E shaped farmyard to the east. The original house has been somewhat altered. The E shaped courtyard has lost its three ranges but the main spine survives adjacent to the modern barn.

***Sources***

(1) Verbal communication: CCC HET 2016. Observations made from 1st Edition Ordnance Survey map (1885).
ID: SCB47894

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

| HER Number | Site Name | Record Type |
|---|---|---|
| MCB33028 | Finchley Gate Farm, Weston Colville | Monument |

***Classification***

| Monument Types and Dates | | Building Materials/Evidence |
|---|---|---|
| Farmyard | Post Medieval - 1540 AD to 1900 AD | Documentary Evidence |
| Farmhouse | Post Medieval - 1540 AD to 1900 AD | Documentary Evidence |
| Barn | Post Medieval - 1540 AD to 1900 AD | Documentary Evidence |

***Monument Status and Scores***

**Associated Legal Designations - None recorded**

**Other Statuses and Cross-References - None recorded**

**Ratings and Scorings - None recorded**

***Location***

**National Grid Reference** TL 6414 5161

**Administrative Areas**

Civil Parish Weston Colville, South Cambridgeshire, Cambridgeshire

**Address/Historic Names - None recorded**

***Description***

1. Finchley Gate Farm, recorded on Ordnance Survey First Edition maps from c.1885. The site comprised a farmhouse (extant) and an enclosed square courtyard, now largely demolished.

***Sources***

(1) Verbal communication: CCC HET 2016. Observations made from 1st Edition Ordnance Survey map (1885).
ID: SCB47894

***Finds - None recorded***

***Associated Events/Activities - None recorded***

***Associated Individuals/Organisations - None recorded***

# Cambridgeshire County Council Designation Full Report

**DesigUID:** DCB268 **Type:** Scheduled Monument **Status:** Active

| NHLE ID | NHLE ID | Legacy ID |
|---|---|---|
| 1019174 | 1019174 | 33267 |

**Name:** Moat House moated site

**Grade:** **Assigned:** 24/11/2000 **Amended:** **Revoked:**

## Legal Description

DESCRIPTION OF THE MONUMENT
The monument includes a medieval moated site and associated fishpond at Moat House, located immediately to the west of Great Coven's Wood and approximately 460m to the north east of the village of Weston Colville.
The moated site includes a roughly square shaped island which measures up to 76m north east- south west by 72m north west-south east. This is enclosed by a seasonally water-filled moat measuring up to 14m wide and at least 2m deep.
Outer banks, thought to represent upcast from the construction of the moat, are visible along the south eastern and south western arms, measuring up to 13m wide and 2m high and 7m wide and 1.2m high respectively. There are now two causeways across the moat; that on the north western side is known to have been in use before 1828 and may represent the original access to the island, whilst that on the south east arm is believed to be modern. Approximately 10m from the southern corner of the moated site is a linear pond measuring 22m in length by approximately 6m wide, following the same alignment as the south east arm of the moat. This is believed to be a fishpond contemporary with the moated site.
The moat is thought to represent the original site of Colville Manor, named after William de Colville, who became the holder when he married Beatrice de Stutville in 1200; the manor had first been subinfeudated to the Stutvilles in about 1150. The manor remained in the Colville family until 1369. By 1560 the moated site was no longer the site of Colville Manor, which by 1612 had been replaced by a house to the south west on the site of the present Weston Colville Hall. The present Moat House, which now occupies the moated site, dates from the 19th century.
Partial excavations carried out on the island in 1991 and 1993 uncovered a series of internal ditches dated to the 14th/15th centuries. Buried building remains have also been identified.
Moat House, the garage and stable block, together with all fencing, walls, the patio and the oil tank are all excluded from the scheduling, although the ground beneath these features is included.

ASSESSMENT OF IMPORTANCE
Around 6,000 moated sites are known in England. They consist of wide ditches, often or seasonally water-filled, partly or completely enclosing one or more islands of dry ground on which stood domestic or religious buildings. In some cases the islands were used for horticulture. The majority of moated sites served as prestigious aristocratic and seigneurial residences with the provision of a moat intended as a status symbol rather than a practical military defence. The peak period during which moated sites were built was between about 1250 and 1350 and by far the greatest concentration lies in central and eastern parts of England. However, moated sites were built throughout the medieval period, are widely scattered throughout England and exhibit a high level of diversity in their forms and sizes. They form a significant class of medieval monument and are important for the understanding of the distribution of wealth and status in the countryside. Many examples provide conditions favourable

to the survival of organic remains.
The moated site at Moat House survives well in the form of earthworks and buried deposits. The island remains largely undisturbed and will retain buried evidence for structures and other features relating to the development and character of the site throughout the medieval period. The buried silts in the base of the ditches will contain both artefacts relating to the period of occupation and environmental evidence for the appearance of the landscape in which the moated site was set.
Fishponds are artificially created pools of slow moving freshwater constructed for the purpose of cultivating, breeding, and storing fish in order to provide a constant and sustainable food supply. The tradition of constructing and using fishponds began in the medieval period and reached a peak of popularity in the 12th century. They were largely the province of the wealthier sectors of medieval society, and are considered an important source of information concerning the economy of various classes of medieval settlements and institutions. The fishpond to the south west of the moated site forms an integral part of the medieval manorial complex and provides further evidence for its economy and status.
Comparisons between Moat House moated site and further examples, both locally and more widely, will provide valuable insights into settlement developments in medieval England.

### Curatorial Notes

**Designating Organisation:** English Heritage

### Location

**Grid Reference:** Centred TL 6213 5335 (127m by 139m)
**Map sheet:** TL65SW **Area (Ha):** 10,329.98

**Administrative Areas**

Civil Parish Weston Colville, South Cambridgeshire, Cambridgeshire

**Postal Addresses - None recorded**

### Designation History

**Assignment**
24/11/2000

### Sources - None recorded

### Associated Monuments

01151 Monument: Moat House, Weston Colville

### Additional Information

**Checked OK:** Y

# Cambridgeshire County Council Designation List Report

*11/12/2024*

| DesigUID | Name | Type | Grade | NHLE ID | NGR | Assigned | Revoked |
|---|---|---|---|---|---|---|---|
| DCB572 | Beech Cottage | Listed Building | II | 1126334 | TL 62755 54812 | 25/04/1984 | |
| **Description** | TL 65 SW BRINKLEY HIGH STREET (South Side)<br>9/34 Beech Cottage<br>II<br>House, c.1800. Local red brick gables with end stacks and slate roof, front elevation plastered timber frame. Two storeys with rear wing of one storey and attic with gable stack. Extension to south timber framed and weather boarded with red pantile roof; originally a butcher's shop. Street facade of three 'bays' with three first floor and two ground floor flush framed, sixteen-paned hung sash windows. Central modern porch with resited shouldered wooden architrave and half-glazed panelled door. L. & R.M. Taylor, Brinkley Recollections. CC.<br>Listing NGR: TL6275654813 | | | | | | |
| DCB6002 | Hillcroft | Listed Building | II | 1127131 | TL 64288 53462 | 11/04/1986 | |
| **Description** | CARLTON CUM WILLINGHAM BRINKLEY ROAD TL 65 SW (North east side) 5/44 Hillcroft (No 6) II Cottage, formerly public house. C17-C18. Timber framed, rendered and pantiled with red brick ridge stack. Three bay baffle entry with bay added to south. One storey and attic. Two dormers with swept slate roof. Two ground floor sixteen pane hung sashes on either side of doorway. South wing also framed and rendered. Pantiled. Originally extending further to south. One storey and attic. One hung sash on east and single small leaded light on west side.<br>Interior: exposed framing.<br>Listing NGR: TL6428853463 | | | | | | |
| DCB4386 | Church of St Peter | Listed Building | II* | 1127132 | TL 64184 52966 | 22/11/1967 | |
| **Description** | CARLTON CUM WILLINGHAM CHURCH ROAD TL 65 SW 5/48 Church of St Peter 22.11.67 GV II* Parish church. C12 origin, mainly C14-C15 and C19. Fieldstone with clunch dressings repaired in limestone. Slate and tiled roofs. Nave, chancel and south porch. West wall of nave rebuilt c.1885 with gabled bellcot. South wall has two C14 windows, restored, of two lights each with reticulated tracery and one with a square head. There are reused C12 shafts in the mullions of the windows. Later two stage buttressing. South porch, C17 much rebuilt. Timber framed and red brick. Chancel, C15. Two windows in south wall of three cinquefoil lights with vertical tracery. East window of similar period and of three cinquefoil lights in two centred arch. Interior: C15 chancel arch. Two centred and of two orders, continuous ogee outer order and wave moulded inner order on responds with half columns embattled capitals and high moulded base. Chancel arch, C15 now with part reused at west end of nave to form a vestry. C15 nave roof. Octagonal crown post with moulded capital and base and two-way bracing to collar purlin on tie beam with shallow arch bracing and pierced spandrel work. Embattled cornice to wall plate of nave roof. Font: C15 and pulpit early C17, on modern base.<br>Pevsner: Buildings of England p313 V.C.H: Cambs vol VI p156<br>Listing NGR: TL6418552967 | | | | | | |
| DCB6336 | Cromwell Cottage | Listed Building | II | 1127133 | TL 62582 54125 | 11/04/1986 | |
| **Description** | CARLTON CUM WILLINGHAM WILLINGHAM GREEN TL 65 SW Cromwell Cottage 5/50 II Row of cottages, now one. C17-C18, renovated. Timber framed, rendered and thatched. Rendered ridge and end stack. Single range with end to road. One storey and attic. Three gable dormers. Five ground floor casements in enlarged window openings. Doorway to centre bay.<br>Listing NGR: TL6258254126 | | | | | | |
| DCB992 | Boundary Cottage | Listed Building | II | 1163543 | TL 63369 54205 | 25/04/1984 | |
| **Description** | TL 65 SW BRINKLEY HIGH STREET (South Side)<br>9/41 Boundary Cottage<br>II<br>Cottage, C16 with some reused mediaeval timber. Timber framed and plastered thatched half-hipped roof. One storey and attic, three unit plan. Five windows, one modern dormer window. Main entrance in gable lean-to to left hand. Inserted local red brick stack into hall, late C17 or C18. C16 floor frame to hall with joists removed from service end. Cottage formerly on the green before the enclosure. RCHM (Cambs. notes), 1952.<br>Listing NGR: TL6337054205 | | | | | | |
| DCB993 | Red Lion Inn | Listed Building | II | 1163567 | TL 62601 54880 | 25/04/1984 | |

| DesigUID | Name | Type | Grade | NHLE ID | NGR | Assigned | Revoked |
|---|---|---|---|---|---|---|---|
| **Description** | TL 65 SW BRINKLEY SIX MILE BOTTOM ROAD (South Side)<br>9/48 Red Lion Inn<br>II<br>Inn; late C16 hall and service end to right hand of central stack and C17 addition to left hand. C19 weather boarded gable lean-to to left hand. Plastered timber frame and painted brick. Rebuilt central stack above roof and stack to right hand. Asbestos and slate roofs. One storey and attic, and two storeys. One casement dormer window; five first floor casement windows and modern closed brick porch. Interior. Side purlin, wind-braced roof to C16 hall with original floor frame, and wall frames at first floor exposed. Sealed inglenook hearths with C19 boxed staircase at first floor. VCH, Vol. IV, p.136. L. & R.M. Taylor, Brinkley Recollections, 1983.<br>Listing NGR: TL6260254880 | | | | | | |
| DCB5048 | Kingsfield Cottage | Listed Building | II | 1163681 | TL 64009 53569 | 11/04/1986 | |
| **Description** | CARLTON CUM WILLINGHAM BRINKLEY ROAD TL 65 SW (North east side) 5/43 Kingsfield Cottage (No 14) II Cottage. C18 extended C20. Timber framed, rendered and long straw thatch with ridge stack of painted brick. One storey and attic. Two ground floor casements and doorway now in addition following C20 remodelling.<br>Listing NGR: TL6401053570 | | | | | | |
| DCB5053 | Lophams Hall | Listed Building | II | 1163725 | TL 64693 52053 | 22/11/1967 | |
| **Description** | CARLTON CUM WILLINGHAM CARLTON GREEN ROAD TL 65 SW 22.11.67 Lophams Hall (formerly listed as Lopham's Hall 5/47 Farmhouse) II Manor house. C15, C16 and C17. Timber framed, rendered and tiled roofs. Red brick side stack with offsets and rebuilt upper courses to north wall. Late C16 - early C17 side stack to south gable end, also projecting and of red brick English bond with some burnt brick. Offsets with some tumbling. Tiled roofs. Irregular plan. The north range remains of the C15 manor house. The south range was built c.1582 (VCH Cambs p151), probably replacing the open hall of the C15 house, and a south west kitchen wing was added later. Two storeys. Flush frame modern casements. Principal doorway in west gable end. Interior: North range. Two bay solar or parlour wing with some framing exposed including the main posts and tie beams. Framing of substantial scantling with plain deep chamfers, but unmoulded arch bracing to the tie beam of the centre truss. The ground floor ceiling is not exposed but photographic evidence and the existence of a contemporary, moulded middle rail indicate that this winy has always been floored. There is a later hearth exposed on ground floor in north wall. This chimney and the fireplaces may have been added later in C16. Peg holes in the middle rail indicate framing that was replaced by the brickwork of the stack. At first floor there is a fine c.1582 ceiling inserted into the C15 frame. Ogee moulded mainbeams with stops enriched with carvings of roses and one with an elephant. The roof has been much rebuilt over this wing but sufficient remains on the gable ends to indicate that it was of clasped side purlin construction. The wing to the south is of two bays. Ogee moulded main beams to quartered ceiling in ground floor room. Clunch hearth with smaller ogee moulding similar to that in the ceiling in north wing at first floor. This fireplace is reset from the first floor. Contemporary wall painting in this room and the room above has now been removed. At one side of the fireplace is a niche in a round head with key block and shaped shelving, early C18. The side purlin roof is wind braced. A lower range to the south west, C17, has an inglenook hearth. The house is built on a moated site.<br>R.C.H.M.: record card V.C.H: Cambs Vol VI p151<br>Listing NGR: TL6469452054 | | | | | | |
| DCB6827 | Old Rectory | Listed Building | II | 1163776 | TL 64153 52944 | 11/04/1986 | |
| **Description** | CARLTON CUM WILLINGHAM CHURCH ROAD TL 65 SW Old Rectory 5/49 GV II House, formerly rectory. Part early C16, but mainly early and late C18. Timber framed red brick rendered. Hipped roofs now covered with modern tiles. Internal and side stacks. Two ranges forming a T-plan. North range, early C16 in origin. Framed, rendered with C18 hipped roof. Two bays and two storeys. Modern fenestration. South range, early c18 red brick rendered and hipped roof. Two storeys and attic. Two C18 dormers on south side. Rebuilt parapet. The south east corner retains two stages of a turret when the house was altered between 1805 and 1813. Doorway in north west wall. Interior: the early C16 wing has leafed stopped and moulded main beam and a chamfered main beam to the second bay. On a moated site. Two watercolours now in the possession of the owner show the house before and after it was gothicised between 1805 and 1813. Only the south-east turret remains from these alterations.<br>Listing NGR: TL6415452944 | | | | | | |
| DCB5058 | Lambra Cottage and Restormel Cottage | Listed Building | II | 1163793 | TL 62680 53852 | 11/04/1986 | |
| **Description** | CARLTON CUM WILLINGHAM WILLINGHAM GREEN TL 65 SW Restormel and Lambra Cottages 5/51 (Nos 4 and 6) GV II Cottage, formerly a PH and now two dwellings. C18 extended C20. Timber framed, rendered and long straw thatch with red brick axial ridge stack and end stack. One storey and attic. Two gable domers and three ground floor small pane modern casements. Applied framing to front wall. Baffle entry doorway now blocked and entries now at ends. Inside: Restormel has small inglenook hearth of red brick, some exposed wall framing and some inserted timber.<br>Listing NGR: TL6268253854 | | | | | | |

| DesigUID | Name | Type | Grade | NHLE ID | NGR | Assigned | Revoked |
|---|---|---|---|---|---|---|---|
| DCB6243 | Hill House | Listed Building | II | 1318127 | TL 64216 53429 | 10/08/1973 | |
| **Description** | CARLTON CUM WILLINGHAM BRINKLEY ROAD TL 65 SW (South west side) 5/45 Hill House (No 11) 10.8.73 (formerly listed as the Old Post Office) II House. Early C19. Brick, rendered and hipped slate roof with two internal stacks. Double pile plan. Double fronted with slightly projecting pedimented centre bay. Two recessed, twelve pane hung sashes on either side of one of nine panes. Rounded headed arch to doorway with doorcase of pilasters and Doric frieze with cornice. Panelled door and swagged and radial glazing bars to fanlight.<br>Listing NGR: TL6421753430 | | | | | | |
| DCB1255 | Churchyard Cross Fragment to South of South Porch of Parish Church of St Mary | Listed Building | II | 1318176 | TL 62936 54810 | 25/04/1984 | |
| **Description** | BRINKLEY<br>In the entry for<br>TL65SW HIGH STREET 9/46 (North Side)<br>Churchyard Cross to south of south porch of Parish Church of St Mary<br>II<br>The address and description shall be amended to read:<br>HIGH STREET (North Side)<br>Churchyard Cross fragment to south of south porch of Parish Church of St Mary<br>II Churchyard cross fragment. Medieval. Masonry assembled as remains of churchyard cross with limestone base and broken chamfered and moulded 'shaft' incised 'RC 1756.<br>TL 65 SW BRINKLEY HIGH STREET (North Side)<br>9/46 Churchyard Cross to south of south porch of Parish Church of St. Mary<br>II<br>Churchyard cross. Mediaeval. Limestone base and broken chamfered shaft.<br>Listing NGR: TL6293654810 | | | | | | |
| DCB1256 | The Old Forge | Listed Building | II | 1318196 | TL 62824 54778 | 25/04/1984 | |
| **Description** | TL 65 SW BRINKLEY HIGH STREET<br>9/35 The Old Forge<br>II<br>House, early C19 (post enclosure 1816). Timber framed and plastered with local red brick end stack and rear stack. Slate roof. Four first floor flush framed sixteen and twelve-paned hung sash windows. Door to right of centre with six raised and fielded panels.<br>Listing NGR: TL6282454779 | | | | | | |
| DCB5998 | Acre Cottage | Listed Building | II | 1331413 | TL 64571 53541 | 11/04/1986 | |
| **Description** | CARLTON CUM WILLINGHAM ACRE ROAD TL 65 SW (North side) 5/42 Acre Cottage II Cottage. C17 and late C18. Brick front wall, timber framed, rendered and mansard roof, pantiled with red brick ridge stack. One storey and attic. Two dormers. three windows on either side of baffle entry doorway. At east end a single bay with steeply pitched pantiled roof, probably C17.<br>Listing NGR: TL6457253541 | | | | | | |
| DCB5664 | Woodman House | Listed Building | II | 1331414 | TL 64205 51617 | 11/04/1986 | |
| **Description** | In the entry for CARLTON CUM WILLINGHAM CARLTON GREEN TL 65 SW 5/46 Woodman Cottage<br>The address shall be amended to read: CARLTON GREEN Woodman House<br>CARLTON CUM WILLINGHAM CARLTON GREEN TL 65 SW Woodman Cottage 5/46 II Cottage. C17-C18. Timber framed with brick casing to front wall and pantiled roof with painted ridge stack and cut down south end stack. Three C19 slated dormers and three recessed enlarged window openings on either side of baffle entry doorway.<br>Listing NGR: TL6420651617 | | | | | | |
| DCB1474 | The Cottage | Listed Building | II | 1331799 | TL 62878 54727 | 07/04/1982 | |
| **Description** | TL 65 SW BRINKLEY HIGH STREET (South Side)<br>9/36 The Cottage 7.4.82<br>II | | | | | | |

| DesigUID | Name | Type | Grade | NHLE ID | NGR | Assigned | Revoked |
|---|---|---|---|---|---|---|---|

House with late mediaeval open hall, C16 inserted stack and two storey parlour extension to south-west. North-east bay, possibly original service bay, rebuilt in late C17 or early C18. Local red brick gable stacks late C17 or early C18, internal stack also partly rebuilt in similar red brick. Timber frame plastered; half hipped slate roof. One storey and attic. Two gabled dormer windows. Two garden casement windows and one four-light casement window. Six-flush-panelled and glazed door. Interior. Timber frame of mediaeval hall remains in three walls with almost complete smoke-blackened collar rafter roof. Wall frames and floor frame of C16 addition exposed; wide cross- passage behind inserted stack. Floors to hall and service rooms possibly late C17 or C18 insertions. The house was formerly on the green before the enclosure. RCHM (Cambs. notes), 1952. L. & R.M. Taylor, Brinkley Recollections.
Listing NGR: TL6287954727

| DCB1475 | Parish Church of St Mary | Listed Building | II* | 1331800 | TL 62948 54831 | 19/08/1951 | |
|---|---|---|---|---|---|---|---|

**Description** TL 65 SW BRINKLEY HIGH STREET (North Side)
9/45 Parish Church 19.8.51 of St. Mary
GV II*
Parish church, chancel C13, nave, aisles and tower C14. Clerestorey, walls of aisles and chancel largely rebuilt in 1874 restoration (see vestry report). Architect F. Thompson. Flint, pebble and clunch rubble walls originaly plastered, knapped flint restored walls and plinth band to tower. Reused, limestone, clunch and C19 Ketton limestone dressings. C15 red brick porch, originally plastered and red brick repairs. Slate roofs. Tower with clasping west buttresses of three stages with parapet and moulted plinth band. Belfry window of two-lights, arch rebuilt. Clerestorey of four bays with two-light windows linked at imposts by stone bands. Similar bands link restored aisle windows, possibly copies of original C14 clunch windows of two-lights with quatrefoil at head. North chancel window with transome for 'low side' shutters now with C14 glass fragments. East window C13 partly restored, four-lancet-lights with large quatrefoil. South porch with four-centred moulded brick arch and shafted jambs with moulded capitals and bases. Door to north entrance C15 or earlier. Interior nave arcades of four bays with octagonal piers with moulded caps and bases, and two-centred arches of two chamfered orders. Chancel arch raised in C19. Arch braced nave roof, pent aisle roofs, and boarded barrel roof to chancel C19. Altar rails, C18. Stoop and two piscinae in aisles C14. C17 box pew in north aisle, and restored pulpit with carved panels. Modern font. Thirty-hour clock, 1779, in tower. C16 and C17 monuments to Sturville family. Pevsner, Buildings of England, p.308. R.H. Cory, His. Notes of Brinkley, 1973, p.13. Wm. Cole, 1750, MS/CRO. VCH, Vol. VI, p.139. RCHMN (Cambs. notes), 1952.
Listing NGR: TL6294854831

| DCB7804 | Church of St George | Listed Building | II | 1391541 | TL 58090 56800 | 08/03/2006 | |
|---|---|---|---|---|---|---|---|

**Description** DULLINGHAM
170/0/10003 SIX MILE BOTTOM
08-MAR-06 Church of St George
II
Church. 1933. Designed by Seely and Paget and built by the Cambridge builders Rattee and Kett. Knapped flint with narrow red brick and tile dressings and panels. Hipped pantile roof. Plan of nave and chancel in one with west tower and vestry. Neo-Georgian style with eaves coving and Crittall metal windows with intersecting tracery heads. Wide east window with basket-arched head and brick panel under to chancel, which is narrower than nave and projects, but which is under the same hipped roof. Nave has 4 windows either side with round-arched heads and brick panels beneath. The SW tower has 3 stages and a SW angle buttress with pantiled set-offs. South face has church doorway which has a round-arched head and double-leaved doors. Loop holes above and top stage has paired bell-chamber openings under a pyramidal pantiled roof with NE angle stack. Vestry behind with a lean-to roof.

INTERIOR.
The austere barrel-vaulted interior has fine oak panelling to the sanctuary with reeded pilasters. Wooden altar supported on an open arcade and panelled priest's and reader's pews. Communion rails with turned balusters. Nave has complete set of fitted oak pews integral with wall dado. Wooden cornice runs round the interior. At the west end an aedicule incorporating a pair of probably C17/C18 Salamonic columnns under a broken round pediment. Within this is the small moulded metal font which stands on an octagonal wooden pedestal.

Plaque records the building of the church to the memory of W.H.B.Hall and there is also a plaque to the memory of A.C.Hall.

On the outside to the left of the door is a plaque recording the laying of the foundation stone on 1st April 1933 by Mrs.Favell Helen Hall who paid for the building of the church. She was John Seely's godmother.

SUMMARY OF IMPORTANCE.
This is a very carefully crafted church by a distinguished firm of architects. The brickwork, which is of very narrow bricks and thin tiles, and the knapped flintwork are particularly fine. The simple interior has fine woodwork and complete fittings. The church remains a fine unaltered example of an interwar church in the Neo-Georgian style.

Source.

| DesigUID | Name | Type | Grade | NHLE ID | NGR | Assigned | Revoked |
|---|---|---|---|---|---|---|---|
| | Information from The Twentieth Century Society. | | | | | | |
| DCB10592 | Carlton War Memorial | Listed Building | II | 1427547 | TL 6418 5301 | 16/07/2015 | |

**Description**

Summary
First World War memorial, with later additions for the Second World War.

Reasons for Designation
Carlton War Memorial, situated at the junction of Church Road and Carlton Green Road in Carlton, is listed at Grade II for the following principal reasons: * Historic Interest: as an eloquent witness to the tragic impact of world events on this community, and the sacrifice it made in the conflicts of the C20; * Group value: with the Church of St Peter (Grade II*).

History
The memorial was erected after the end of the First World War. The names of two villagers who died fighting during the Second World War were added at a later date. In 2009 the memorial was cleaned and the lettering restored, funded by a War Memorials Trust grant.

Details
Carlton War Memorial stands at the junction of Church Road and Carlton Green Road, opposite the church of St Peter (Grade II*-listed). It comprises a simple Portland stone cross with chamfered edges, supported by a small square foot which rises from a tapered plinth.

The dedicatory inscription reads ERECTED/ TO THE MEMORY OF/ THE MEN OF CARLTON. An inscription on the face of the cross reads FAITHFUL UNTO DEATH. The front face of the foot stone reads 1914 – 1918. The names of the 10 servicemen who died fighting during the First World War are carved on the front face of the plinth, and the two who died in the Second World War on the rear with the dates 1939 – 1945. All the inscriptions are incised and filled with mortar.

The base of the memorial is surrounded by a concrete kerb which encloses a flower bed.

Sources
Websites
War Memorials Online, accessed 16 January 2017 from https://www.warmemorialsonline.org.uk/memorial/78395
War Memorials Register, accessed 16 January 2017 from http://www.iwm.org.uk/memorials/item/memorial/46515
War Memorials Trust, Grants Showcase - Carlton, accessed 22/05/2015 from http://www.warmemorials.org/search-grants/?gID=728

# Cambridgeshire County Council HER - Fieldwork List with non-Archive Sources

*11/12/2024*

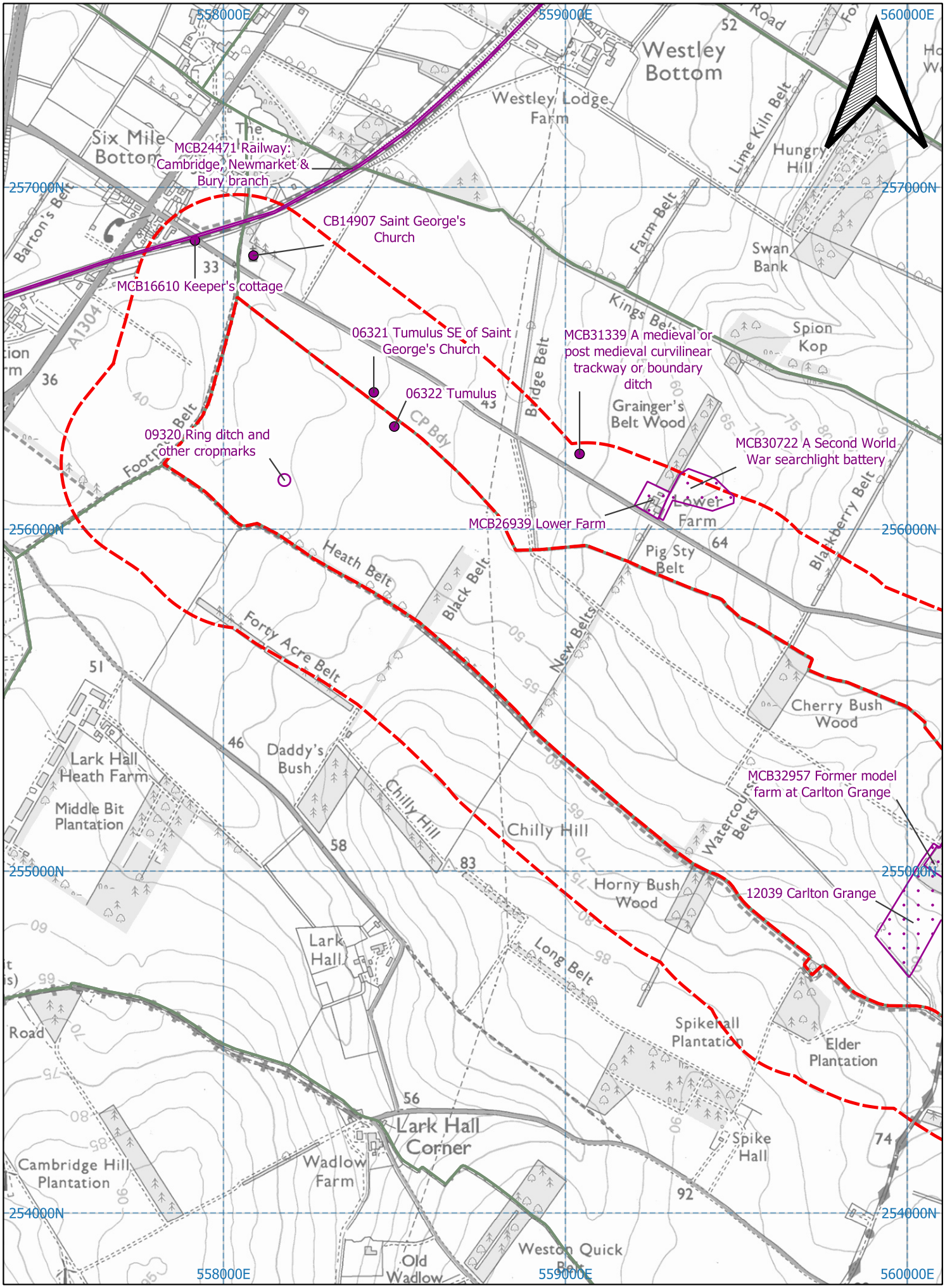
| Event Ref | Event Name | Organisation | Dates | Parish | NGR |
|---|---|---|---|---|---|
| ECB2324 | Land west of Red Lion, Brinkley Road, Brinkley | Heritage Network | 01/01/2008 - 31/12/2008 | Brinkley, East Cambridgeshire, Cambridgeshire | TL 6250 5488 |

**Description** Report in DC. Paper copy only

| **Sources:** | | | |
|---|---|---|---|
| Unpublished report: Winter, M. & Saunders, G. 2010. Land West of the Red Lion Public House, Brinkley, Cambridgeshire: archaeological assessment report. | Heritage Network Report 579 | Location: |

# Cambridgeshire Historic Environment Record

Cambridgeshire County Council




Scale (at A4) 1:14,000 11-12-2024

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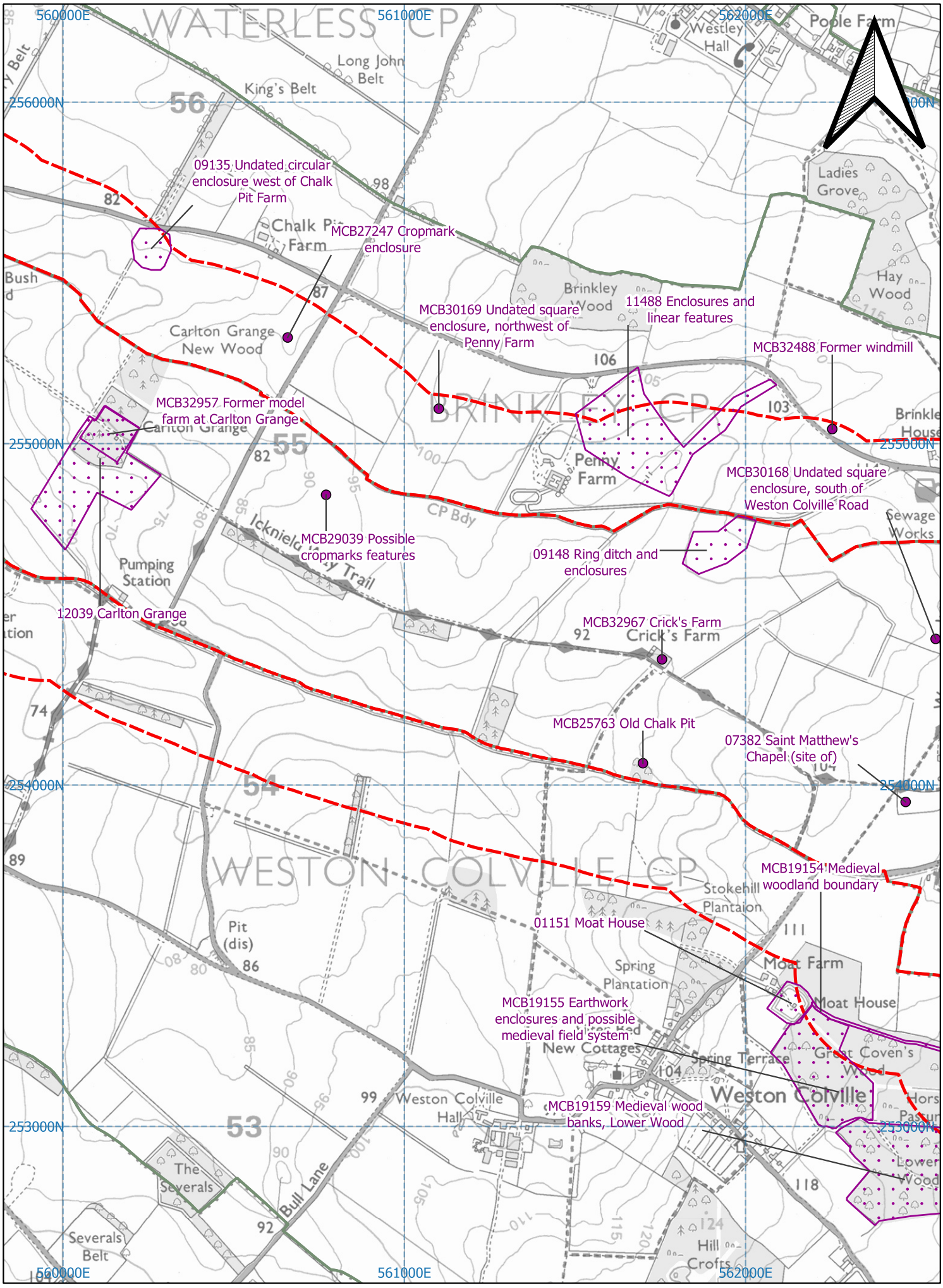


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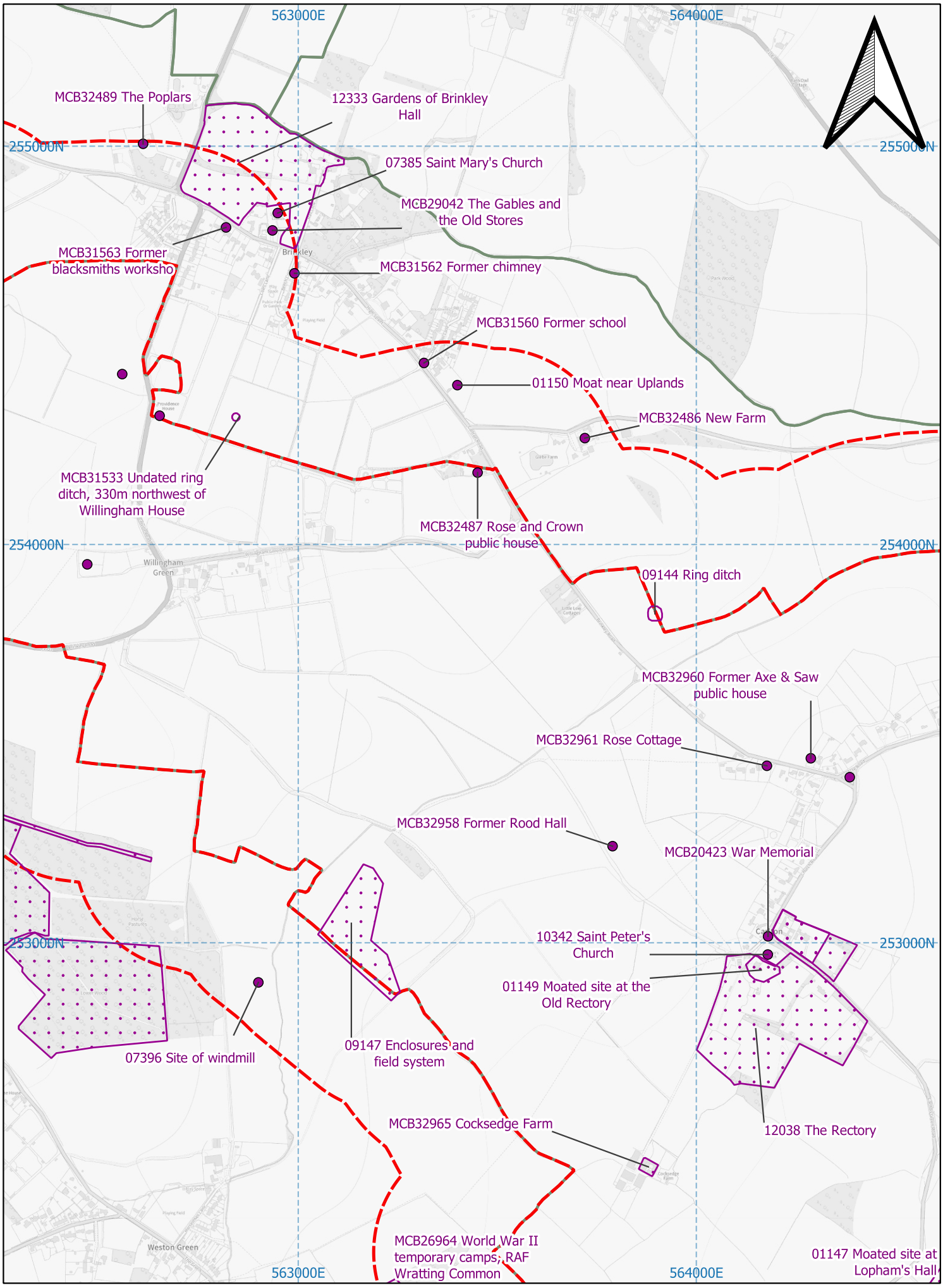


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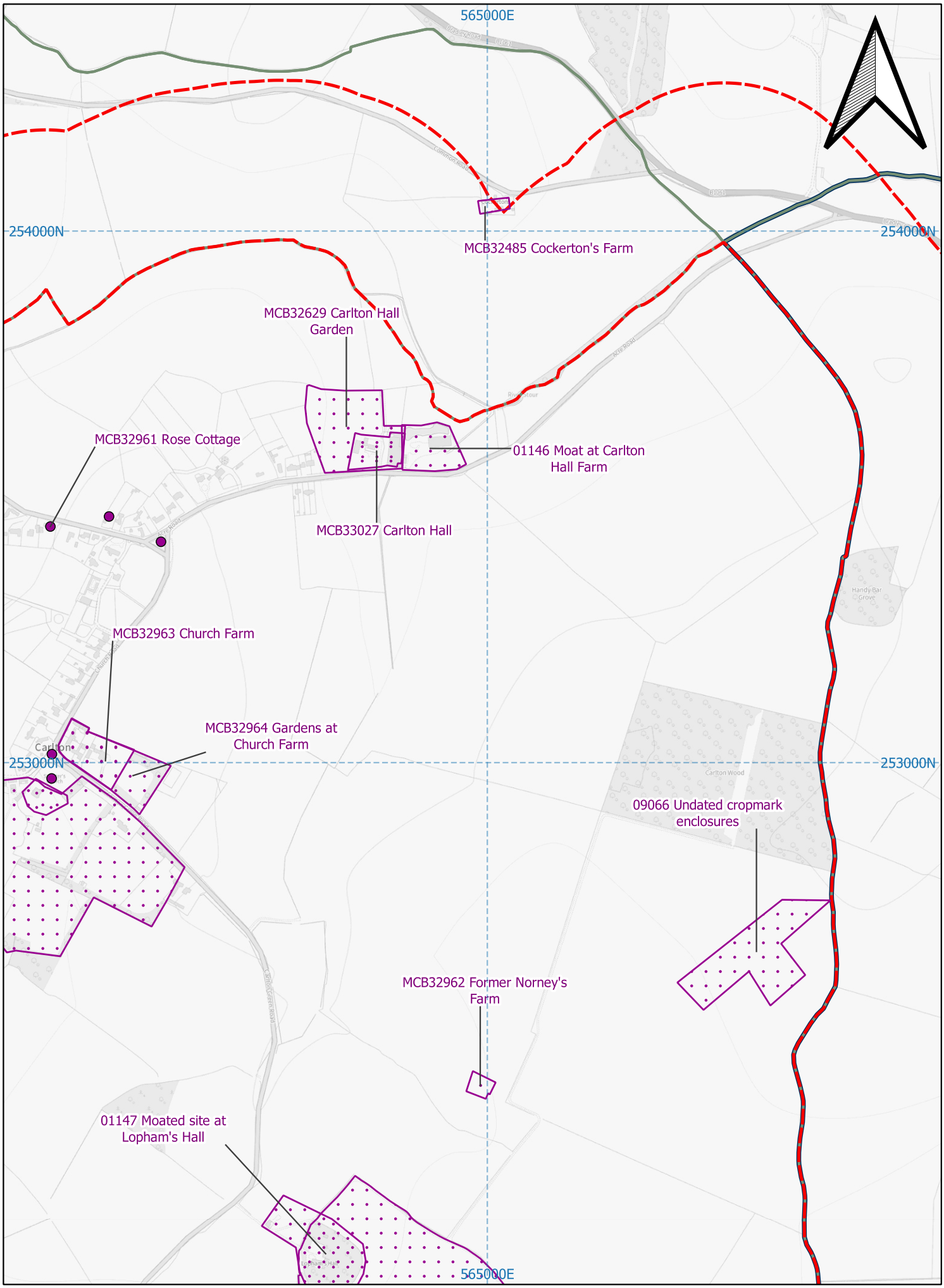


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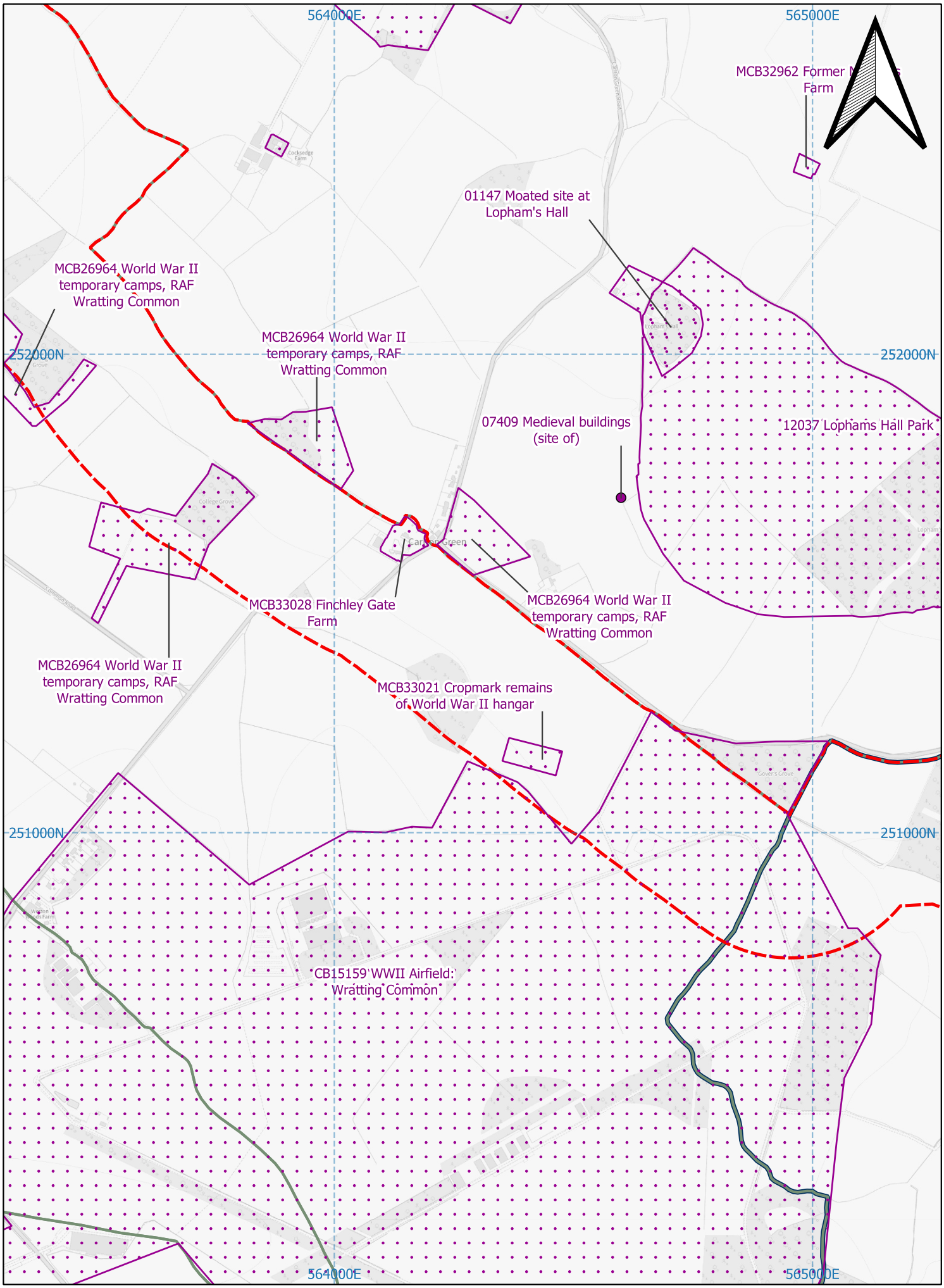


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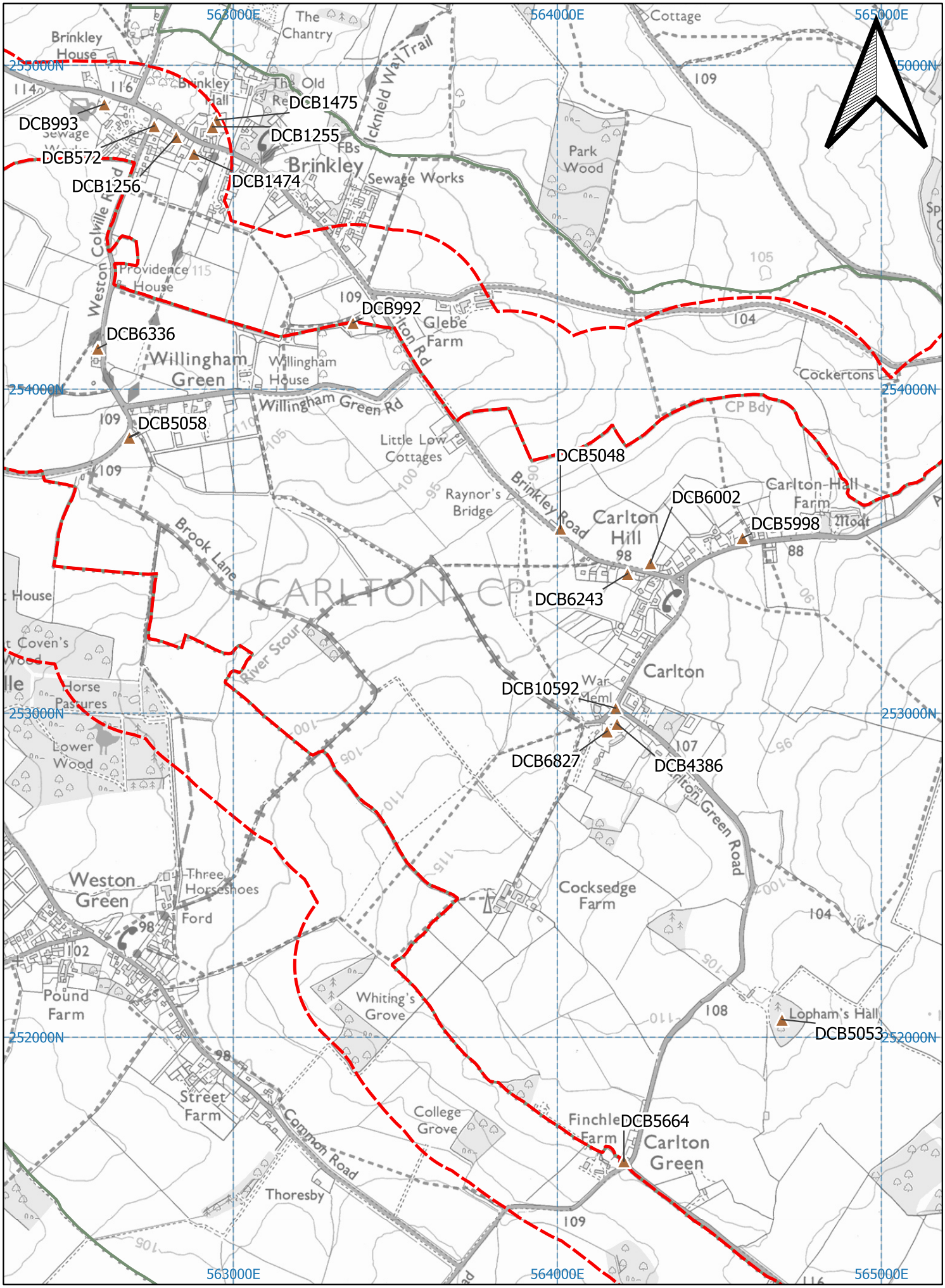


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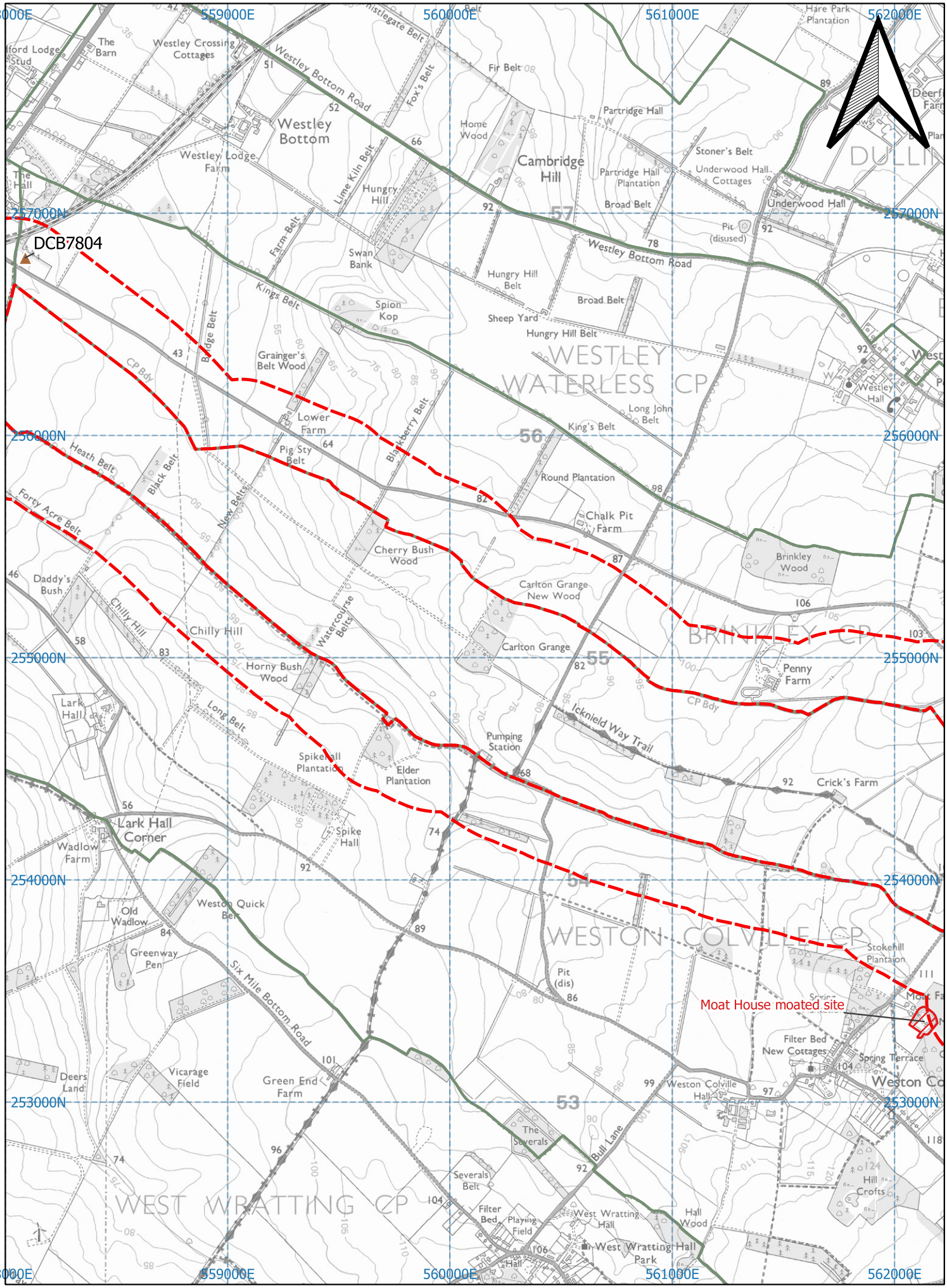


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# Cambridgeshire Historic Environment Record

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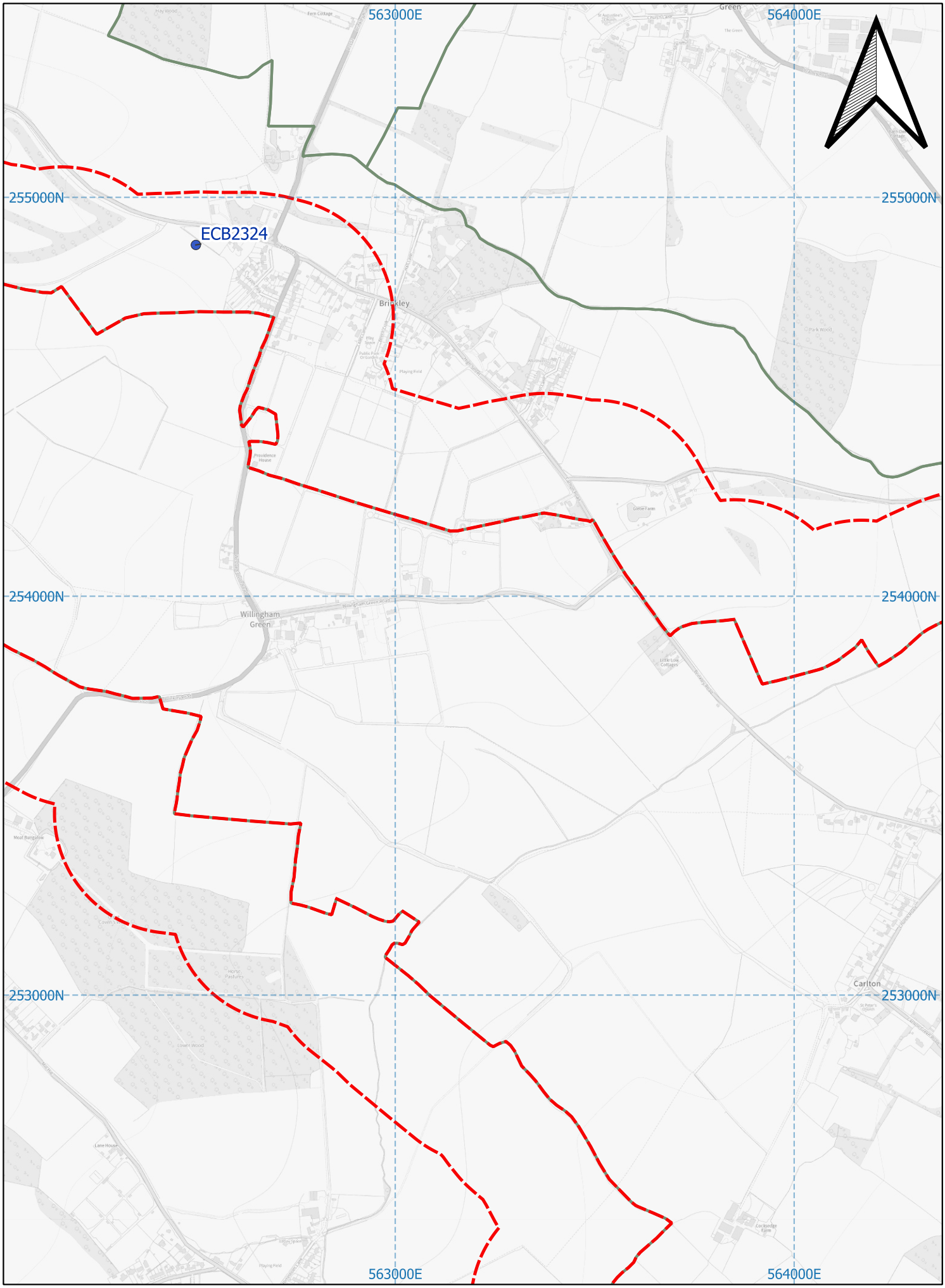


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11-12-2024

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**Development Management**

**Central Bedfordshire Council**
Priory House, Monks Walk
Chicksands, Shefford
Bedfordshire SG17 5TQ
www.centralbedfordshire.gov.uk

Deb Glassop
The Planning Inspectorate
Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN

**Contact** Debbie Quinn
**Direct Dial** [redacted]
**Email** [redacted]
**Your Ref**
**Date** 14 January 2025

Dear Deb Glassop,

**Application No:** **CB/24/03666/OAC**
**Location:** **Kingsway Solar Farm, Cambridgeshire**
**Proposal:** **Other Authority Consultation - Proposal: The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.**

I refer to your letter of 17 December 2024 regarding the Scoping Opinion request as shown above and would confirm that Central Bedfordshire Council has no comments to make on the Scoping Opinion request.

Yours sincerely,

[redacted]

**Andrew Davie**
**Service Director Development & Economy**

## Patten, Jack

**From:** clerk@dullingham-pc.org.uk
**Sent:** 14 January 2025 15:19
**To:** Kingsway Solar Farm
**Cc:** Rob Algar
**Subject:** EN010165 - Kingsway Solar Farm - EIA Scoping Consultation and Notification

**Follow Up Flag:** Follow up
**Flag Status:** Flagged

Please see below Dullingham Parish Council's response:

Whilst Dullingham Parish Council supports the need for more sustainable energy supplies we do not believe the environmental and social costs of this project in anyway justify it proceeding and we strongly OBJECT to this development.

**Construction**
The construction of the site will involve a large increase in vehicular traffic that will itself create environmental harm through emissions, noise and the movement of a large volume of otherwise unnecessary traffic. This will also have a major impact on the quality of life for all those villages and homes that will be within the site area.
The plans show that there will be disruption to existing hedging and woodland and where this is classed as “ancient” the ecosystems are not recoverable and even on a small scale this would not be considered acceptable for other applications.
The construction of the solar panel infrastructure will have an adverse impact on biodiversity that we see little or no evidence to show how it will be able to return to its current state let alone be improved. Whilst an intention has been given to reinstate the land the long term effects of this scale and type of development has no tested methodology for removal of infrastructure and the long term effects are unknown.

**Land use**
This site is spread across agricultural land that currently helps our food security, supports local jobs and benefits the wider economy. The loss of high grade agricultural land is contrary to the guidance originally published for the siting and construction of solar farms. Any suggestion that this land is suddenly of a lower grade, despite there being no change in current use or yields, would not have any logical basis.

**Operation**
Whilst it has been suggested that the areas around the panels will become rich in biodiversity this is, we believe, questionable as the types of plants will need to be controlled so they do not prevent access or reduce light levels and there is a lot of land that will be in shade. The use of sheep has, we understand, not been entirely successful as they themselves cause damage to the infrastructure and mechanical control has to be restricted as debris can damage the panels. This suggests that the use of chemical control may be required but the scale of this has not been indicated.
The operational areas are to be fenced with security fencing that not only will have an industrial appearance but will have a major impact on wildlife movement the consequences of which are not determined. In addition no allowance has been made for any possible adverse effect on highway safety when larger animals are forced to use roads as movement corridors.
Any biodiversity enhancements would be reduced by the restrictions on animal movement and access.

Best wishes

Karen Peck

-----Original Message-----
From: "Kingsway Solar Farm" <SM-KingswaySolar@planninginspectorate.gov.uk>
Sent: Tuesday, 17 December, 2024 10:52
To:
Subject: EN010165 - Kingsway Solar Farm - EIA Scoping Consultation and Notification

### FAO Parish Clerk

Dear Sir/Madam,

Please see attached correspondence on the proposed Kingsway Solar Farm.

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **14 January 2025**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards,

Jack Patten

**Jack Patten** (He/Him)
EIA Advisor
The Planning Inspectorate

The Planning Inspectorate

@PINSgov The Planning Inspectorate planninginspectorate.gov.uk

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East Cambridgeshire District Council

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01353 665555

Deb Glassop
The Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN

Via email only to:
KingswaySolar@planninginspectorate.gov.uk

This matter is being dealt with by

Holly Durrant

Email: holly.durrant@eastcambs.gov.uk

Phone: 01353 665555
My reference: EXT/00015/24
Your reference: EN010165
Date: 14 January 2025

If you require this letter in large format, please email ContactUs@eastcambs.gov.uk.

Dear Ms Glassop,

**Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11**

**Application by Kingsway Solar Farm Limited (the Applicant) for an Order granting Development Consent for the Kingsway Solar Farm (the Proposed Development)**

**Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested.**

I write in relation to the consultation on the Scoping Opinion for the above development on behalf of East Cambridgeshire District Council as a relevant authority under Section 43(1) of the Planning Act 2008.

East Cambridgeshire District Council has reviewed the applicant's EIA Scoping Report and appendices (prepared by Kingsway Solar, dated December 2024). Our comments relate to the Grid Connection Corridors (A and B) and their wider study areas within the Council's administrative boundary.

Comments from the Council's internal departments and specialist officers have been sought to inform this response. It is understood that Cambridgeshire County Council and South Cambridgeshire District Council are responding separately to this consultation, and this response therefore seeks to comment on only those matters within the jurisdiction and specialisms of this Council and its functions.

In preparing this response, the Council is disappointed to note that the Applicant did not heed the Planning Inspectorate's advice as set out within the Section 51 Advice Notice dated 13 November 2024, in which the Inspectorate advised against the submission of the Scoping Report close to the seasonal holiday. This was given the potential for precluding fully informed responses from relevant statutory bodies owing to reduced capacity. Given the limited time in which the Council has had to review the Scoping Report and appendices, the Council is therefore reserving the right to add to these comments under future consultations.

In general, it is considered that the Scoping Report and appendices sets out a comprehensive scope within each topic area for inclusion within the Environmental Statement. Where comments from specialist officers within the Council concur with the conclusions in the applicant's Scoping Report, they are not repeated in full here for conciseness. A short summary is provided.

The following specific comments are noted:

**Policy**
The Scoping Report is generally cognisant of the Development Plan for the Council, with exception of the following supplementary documents:

- East Cambridgeshire District Council's Natural Environment SPD (2020)
- East Cambridgeshire District Council's Renewable Energy (Commercial Scale) SPD (2014)
- East Cambridgeshire District Council's Interim Nature Recovery Network for East Cambridgeshire (2022)

**Biodiversity**
The Council welcomes the design of biodiversity enhancements in accordance with priorities emerging from the developing Cambridgeshire and Peterborough Local Nature Recovery Strategy (LNRS). However, as an interim position and in the absence of an adopted LNRS, the Council's 'Interim Nature Recovery Network for East Cambridgeshire' (August 2022) should be used to guide biodiversity priorities and enhancements.

It is also understood that at the time of preparing the Scoping Report (December 2024), the Grid Connection Corridors had not been surveyed for the purposes of Preliminary Ecological Assessment (PEA). The Council's Senior Ecologist therefore advises against the scoping out of any protected or notable species (for example Hazel Dormice - page 117 of the Scoping Report) until such a time that these surveys have been undertaken. It is also advised that the applicant should be consulting Cambridgeshire & Peterborough Environmental Records Centre (CPERC) and not solely the People's Trust of Endangered Species (2018), to ensure a more holistic understanding of local species.

The Council cannot comment on the acceptability of the Preliminary Ecological Assessment (PEA) (Appendix F to the Scoping Report), or ascertain whether the PEA had any relevance to the Grid Connection Corridors and wider study area, as this document has been marked as confidential and excluded from the documents sent to the Council as well as those available online.

Reference to irreplaceable habitats was not immediately apparent within the Scoping Report. The Council also wishes to draw attention to The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024, which provides a broader but equally important definition of irreplaceable habitats for the purposes of assessment and net gain.

Section 6.2.10 of the Scoping Report notes that the scheme will seek to deliver significant landscape, as well as biodiversity enhancement and green infrastructure connectivity. The Council welcomes further discussions with the Applicant on opportunities for these enhancements.

The Council's Trees Officer would like to ensure that all trees likely to be affected by the proposed development during construction, operation and decommissioning are fully assessed. It is noted that, depending on the chosen route of overhead lines and how they cross tree belts in particular (diagonally/perpendicular/parallel), this could affect the degree of impact and loss.

**Landscape and Visual**

The Scoping Report sets out that the Grid Connection Corridors have been subject to site visits and desk-based assessments to inform key receptors and Public Rights of Way (PRoWs). These assessments have not yet been developed further in terms of Zones of Theoretical Visibility (ZTVs) or viewpoints, and the Council can therefore offer limited comments as to acceptability at this stage. Nevertheless, the Council welcomes further discussion of these matters with the Applicant in due course.

In the absence of ZVTs for the Grid Connection Corridors, it is considered that scoping out visual receptors over 3km (6.2.8) could be premature. This is particularly noting that the report references the existing OHL arrangement being a prominent feature from the Devil's Dyke and drained fens (6.2.5), although does not appear to clarify where along Devil's Dyke or drained fens these are most visible or prominent. This is also noting that the report recognises the high volume of PRoWs within Grid Connection Corridor A (2.4.31), upon which the impacts of the Grid Connection Corridors have not been assessed. The ZVTs provided for the Developable Areas A, B and C and proposed substation expansion further appear to extend beyond the 3km suggested study area.

In identifying receptors, the Scoping Report includes 'key recreational routes' (6.2.5) as one such receptor. The Council would like to ensure that both formal recreational routes such as National Cycle Route 11, and any link routes to these routes, are included as part of this receptor. The Scoping Report's approach to defining and identifying 'key recreational routes' also remains unclear.

The Council would also like to ensure that when preparing ZTVs and agreeing viewpoints, the Applicant considers elevated views from horseback are also considered within the Environmental Statement. This is on account of a large number of bridleways and byways, and horse-related receptors such as stud farms, racecourses and polo clubs, within or in close proximity to the proposed site boundaries, especially within the Council's administrative boundary.

In applying the Rochdale Envelope (realistic worst-case scenario) approach, the applicant's Scoping Report is based upon the installation of overhead powerlines (OHLs) within the Grid Connection Corridors, connecting to a new Burwell South Substation / expansion. The Council understands that in this scenario, the landscape visual impacts of the OHL are unlikely to be fully mitigated, as set out at Paragraph 6.2.6 of the report. At the time of drafting, the assessment of the Grid Connection Corridors appears to remain limited, and the Council would like to see that this element of the Environmental Statement is fully considered and not treated as a secondary matter to the Developable Areas themselves. This is noting especially that these corridors are likely to have long-lasting visual impacts, with limited options for successful mitigation.

**Cultural Heritage**
The Council's Conservation Officer raises no concerns with the scope of the Environmental Statement regarding cultural heritage, although draws the Applicant's attention to the Local Heritage Listing Project which should be included within the list of data sources at 6.3.3 of the Scoping Report. These responses only apply to above-ground built heritage assets within East Cambridgeshire.

**Land, Soils and Air Quality**
The Council's Scientific Officer has reviewed the chapters of the Scoping Report of relevance to land, soils and air quality. The Scientific Officer raises no concern with the scope outline, and concurs with the receptors, assets and resources identified.

**Noise and Vibration**
The Council's Environmental Health Officer welcomes the provision of a Construction Environmental Management Plan, Lighting Strategy and Noise Impact Assessment, and raises no concerns regarding the methodologies proposed for these identified reports.

The Environmental Health Officer notes that core working hours on-site are proposed from 7am Monday to Saturday, with daily finishing at 7pm Monday to Friday. These times, especially the start time of 7:00am, contradicts the Council's guidance for noise and noise nuisance, which generally seeks the following building site hours:

- Monday to Friday: 7:30am to 6pm
- Saturday: 7:30am to 1pm
- Sunday: No noisy work at all

**Population**
The Council will defer to Cambridgeshire County Council for specialist advice on health impacts as set out within the 'Population' section of the Scoping Report. With regard to the socio-economic effects of the proposed development, it is not clear whether the report addresses horse racing industry impacts as result of the proposed scheme. It is also not clear whether the Scoping Report is treating development associated with the horse racing industry as a recreational, tourism or business.

The Scoping Report recognises at 6.2.8 (Landscape and Visual) that there is "Potential for large scale changes in views for visitors and users of the studs" but does not seek to clarify whether these impacts have been considered in an economic sense.

The Council would therefore question whether this matter should be scoped into the Environmental Statement.

**Other Environmental Matters**
The Council has considered the applicant's approach to electromagnetic fields (EMF) for the proposed overhead powerlines as set out at 5.5.5, namely that this matter is to be scoped out of the Environmental Statement in favour of an EMF report to be included with the Development Consent Order (DCO) submission itself. This generally accords with the Planning Inspectorate's guidance and on this basis the Council raises no concerns with this element of the Scoping Report, subject to provision of the identified EMF report.

The applicant proposes to submit an outline Battery Safety Management Plan (oBSMP) with the DCO submission itself. The Council welcomes this as a detailed technical document but questions the proposed scoping out of major accidents and hazards in general from the Environmental Statement.

**Cumulative Effects Assessment**

The applicant is proposing to utilise the Council's planning portal to review relevant applications for the purposes of cumulative assessment, within a defined set of parameters for development types and 'status' of the development (i.e. commenced, granted, or application submitted. The Council is content with the development types set out at 7.1.19 of the report, but suggests the applicant also considers screening opinions and not just scoping opinions for other relevant development types such as solar farms. This is on the basis that many applicants bypass the optional scoping regime for applications that fall under the Town and Country Planning Act (TCPA) 1990 (as amended). The absence of a Scoping Opinion does not therefore necessarily guarantee an application is any less likely to come forwards for TCPA developments.

Section 7.1.23 of the Scoping Report also notes Cambridgeshire County Council as the only statutory authority with which the 'long list' of other developments will be agreed for cumulative assessment. It is considered that all relevant Councils should be included for consultation at this stage of the process to ensure all inter-project cumulative effects are considered, prior to a short list of these developments being prepared.

The Council also queries why 'negligible' residual effects are not to be considered when assessing intra-project combined effects (7.1.7). It is considered that for a comprehensive assessment, all residual effects should be reported.

**Other Matters**

Aside from the above comments, the Council defers to Cambridgeshire County Council regarding specialist advice on water/flood risk, archaeology, traffic and transport, human health, and waste and minerals. The Council also defers to South Cambridgeshire District Council for any matters within or affecting land within their administrative boundary.

Yours sincerely,

Holly Durrant MRTPI

Major Projects Planning Officer
Planning Department
East Cambridgeshire District Council

cc: David Morren, Strategic Planning & Development Management Manager (ECDC)

creating a better place
for people and wildlife

Environment Agency

Deb Glassop - EIA Advisor
Planning Inspectorate,
Environmental Services,
Temple Quay House,
2 The Square,
Bristol,
BS1 6PN

**Our ref:** XA/2024/100230/01

**Your ref:** EN010165

**Date:** 13th January 2025

Dear Deb,

**Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11**

**Application by Kingsway Solar Farm Limited (the Applicant) for an Order granting Development Consent for Kingsway Solar Farm (the Proposed Development)**

Thank you for consulting the Environment Agency on the Environmental Impact Assessment (EIA) Scoping Opinion for the above Nationally Significant Infrastructure Project (NSIP).

We have reviewed the documents: Kingsway Solar Farm EIA Scoping Report – Main Report and Kingsway Solar Farm EIA Scoping Report – Appendices Part 1, 2, 3 and 4 prepared by RSK Environment Limited, dated December 2024 insofar as they relate to our remit. We wish to provide the following comments.

We recommend the following issues are scoped in where they are currently proposed to be scoped out. General comments for consideration and advice to the applicant is provided in Appendix 1.

**Flood Risk**

Table 5.1 highlights flood risk as a water factor receptor to be scoped out of the EIA. All sources of Flood risk should be scoped in for construction, operation and decommissioning phases of the Scheme.

The resilience and impacts of climate change need to be considered and it should be demonstrated that all essential infrastructure can operate in design flood events from all sources of flooding. Climate change should be considered up to the 2050 and 2080 epochs and include the appropriate sensitivity testing for maximum credible scenario.

Flood Modelling

Section 5.2 states the impacts of the Scheme on flood risk and surface water drainage are scoped out of the EIA although a Flood Risk Assessment (FRA) will be undertaken to ensure that flood risk has been considered. Whilst the production of an FRA is welcomed, the impacts of the Scheme on flood risk and water drainage during the construction, operation and decommissioning phases of the development should be scoped in as there are many unknowns around flood modelling and climate change at this stage.

**Groundwater and Land Contamination**

Section 6.4.9 sets out the receptors/matters proposed to be scoped out of further assessment. Items relevant to groundwater quality are as follows:

- Land (potential contamination during operation phase), on the basis that any issues related to land contamination would be managed by the requirements of the outline Operational Environmental Management Plan (oOEMP) and outline Decommissioning Environmental Management Plan (oDEMP), including addressing the potential for the Scheme to affect existing sources of contamination.
- Groundwater (potential contamination during operation phase), on the basis that the operational Scheme is unlikely to significantly affect groundwater quality, and that the mitigation measures set out in the oOEMP would incorporate measures to reduce the potential for contaminative impacts during operation such as measures to prevent discharge, losses or fire from the Battery Energy Storage System (BESS) and information concerning any cleaning agents or other products used during the operational phase.

Due to the high sensitivity of groundwater resources within the Developable Area, in particular the significant proportion of the site within Source Protection Zone (SPZ) 1 and SPZ 2, uncertainty with regard to the proposed number and location of BESS and substation structures as part of the Proposed Development and pending review of the proposed Drainage Strategy for these features, we do not agree with the scoping out of impacts to groundwater during the operation phase at this time.

**Surface Water Quality**

Section 5.2.33 and Table 5.1 provides justification for scoping out consideration of impacts from the Proposed Development on surface water. The following justifications have been used to support this position with respect to surface water quality:

- An outline Construction Environmental Management Plan (oCEMP) and oDEMP will be provided as part of the DCO application which will ensure the protection of surface water quality and to protect Water Framework Directive (WFD) watercourses during construction and decommissioning phases, which would include emergency spill response procedures. The plans will also ensure safe working practices in the flood zones;
- The outline surface water drainage strategy will ensure the quality of surface water discharged from site has been considered during the operational phase;
- The Grid Connection Corridor will contain either an overhead pylon or underground cabling installed via trenching. Overhead pylons can span over watercourses, which will prevent any impact on the water environment. If an underground cable is required, then it is assumed the appropriate techniques will be employed to ensure no impacts on watercourses. Should Horizontal Directional Drilling (HDD) be required then an HDD fluid breakout plan will be provided with the DCO application; and
- The potential cessation of agricultural activities in place of a solar farm will reduce the application of pesticide required. This may improve the water quality of surface runoff and therefore of the receiving watercourses.

We disagree with the proposed scoping out of impacts to surface water quality at this time. The mitigation measures outlined above are welcomed, and we look forward to reviewing the relevant documentation as these become available. However, pending confirmation of the measures to be employed to prevent firefighting water from the BESS compound(s) from entering the surface water environment, we disagree with the scoping out of impacts to surface water quality during the operation phase at this stage.

**Biodiversity**

Otter and water vole are proposed to be scoped out for all phases of development across all Developable Areas despite lack of survey data or assessment for suitable habitat on the basis that it should be possible to avoid impacts. We are unable to support this decision in the absence of survey data and more detailed design information. If these species are found to be present, in addition to avoidance of impacts as proposed within the Scoping Report, we would encourage consideration to be given for how conservation objectives may be supported. For example, this may be achieved through implementing sensitive ditch management practises and other enhancement measures.

**Fisheries**

Fish are noted as scoped in for Developable Area C construction and decommissioning in Table 6.1.8 but scoped out in Table 6.1.10 summary of scoping for decommissioning. These matters should be scoped in until sufficient evidence is available to inform the decision.

Fish species

According to our records there are bullhead (*Cotus gobio*), European eel (*Anguilla anguilla*) and spined loach present in the Burwell Lode. There are records of bullhead and European eel in the Bulbeck Lode. There are records of brown/sea trout (*Salmo trutta*), bullhead and spined loach present in the River Stour, downstream of the proposed Order limits. These should be included in the EIA.

Electro-Magnetic Fields

The potential impacts on fish from Electro-Magnetic Fields (EMFs) where high voltage cables are crossing under main watercourses should be scoped into the EIA. We would favour high voltage cables to avoid crossing beneath main watercourses, but where this cannot be avoided, our position is as follows:

There is potential for the EMF generated to impact on fish behaviour. There is evidence that EMF may also impact the development of fish eggs and fish fry. In the absence of conclusive evidence of no impact, we adopt the precautionary principle and require that appropriate measures are put in place by the developer, so that no detectable EMFs result from the installation of underground cables within the wetted area of an inland waterbody.

The Fenland SAC should also be scoped in for EMFs as it is hydrologically linked to the Burwell Lode water body with the possible presence of spined loach.

Horizontal Directional Drilling

We advise that impacts on fish from noise associated with vibration from HDD should be scoped into the EIA. Certain levels of noise can impact migratory fish through behaviour changes, thus disrupting key migratory life stages. In extreme cases noise levels can cause permanent damage to fish or at worse mortality.

**Geomorphology**

With regards to the impact of the Scheme upon watercourses and their geomorphology, we do not agree that the water element should be scoped out at this stage.

Water Framework Directive

Headwater tributaries of the River Stour (Suffolk) are located within the site boundary, in array area C, along with tributaries of the River Cam. A section of river also flows along one of the boundary lines.

It is also worth noting that small watercourses with catchments of less than 10km sq are not identified on the mapping as being part of the WFD waterbody. Those watercourses that flow into a WFD waterbody are also considered to be part of that WFD waterbody.

Any action in the headwaters of a river could have an effect downstream, which could be either positive (e.g. reduction in agricultural runoff) or negative (e.g. increase in silt, changes in water quality, disturbance of spring lines). To scope out the water element by way of no impact on WFD waterbodies, since there aren't any within the site boundary, is therefore unjustifiable.

We also note that, within Chapter 6, one of the receptors mentioned is Wicken Fen which has been scoped in as it is not known whether there is a hydrological connection with the site and Wicken Fen, despite looking to scope out all the water (i.e. hydrological) elements in the previous chapter.

We trust that this information is of use to you.

If you require any further details, please do not hesitate to contact us on the details below.

Yours sincerely,

**Siobhan Martin**
**Planning Advisor**
**National Infrastructure Team**

Email: NIteam@environment-agency.gov.uk

## Appendix 1 – Informatives / Advice to Applicant

### Flood Risk

Flood Risk Assessment

We welcome the production of a Flood Risk Assessment (FRA) as mentioned in Section 5.2. The FRA will need to consider all flood risk related impacts during the construction, operation, and decommissioning of the Scheme.

The proposed scheme is classified as '*Essential Infrastructure'* as defined in Annex 3: Flood Vulnerability classification of the Planning Practice Guidance (PPG).

There are some areas of the site that are situated within Flood Zones 2 and 3 which have a higher probability of flooding from rivers and/ or the sea. The Sequential Test will therefore be required to be passed, as outlined in the National Policy Statement (NPS) EN-1, and the National Planning Policy Framework (NPPF).

A sequential approach should be applied to the layout of the site, with all buildings, substation, and anything considered to be critical infrastructure located outside of areas at risk of flooding (Flood Zone 1). However, if solar panels and equipment need to be situated in areas at risk of flooding (Flood Zone 2 and 3), then The Exception Test must also be applied and the FRA must assess flood risk from all sources of flooding.

Built development within the fluvial floodplain should be quantified to establish the need for compensatory flood storage and demonstrated in the FRA.

The Scoping Report states that the project has an operational lifetime of 40 years. Please note that the PPG (Paragraph: 006 Reference ID: 7-006-20220825) states that non-residential development should include an assessment of flood risk over at least 75 years.

The impacts of climate change on flood risk must be fully considered. This assessment is necessary to understand the impacts of future flood risk to the development. Due to the lifetime of the development, we would expect the development to be assessed against the higher central and upper climate change estimates for the 2080's epoch. The higher central scenario for the 2080's epoch would constitute the design event for the Scheme. The upper estimate would act as a sensitivity test. The assessment should also be able to demonstrate how proposals can be adapted over their predicted lifetimes to remain resilient to the upper climate change scenario, as required by NPS EN-1.

The applicant should use the 1 in 100 years plus an allowance for climate change as the design event when reviewing the necessity for floodplain compensation. Additionally, the design flood level should be used when designing finished floor

levels and river crossings with an additional 600mm freeboard as the minimum height.

The applicant will need to confirm operational needs for the site, i.e., will the site remain operational and will staff remain on site during a flood event. There will also need to be consideration given to access and egress from the site during flood event scenarios.

Culverting

The Scoping Report indicates potential for new crossings over watercourses, with structures such as culverts and cables. Any proposed crossings should be designed so that the soffit level of any bridges is above the design flood level. The Environment Agency opposes the culverting of any watercourses and instead prefers the installation of a temporary clear-span bridge crossing. This is in line with our policy regarding culverts. We will normally only grant a permit for a culvert if there is no reasonably practical alternative, and if the detrimental effects would be sufficiently minor that a more costly alternative would not be justified or there are reasons of overriding public/economic interest. You should consider the effects of proposed crossings on hydrology, biodiversity and geomorphology.

Cabling

If cabling under main rivers is to be proposed, the applicant should consider the effects on all environmental receptors including hydrology, groundwater, biodiversity and geomorphology. Open cut methods are unacceptable due to the number of crossings and the impacts crossings and access tracks can pose to the environment.

Surface water drainage

Surface water drainage should be appropriately managed for the lifetime of the development as well as throughout the decommissioning of the Scheme.

Buffer zones

Three Main Rivers with associated flood plain are identified in the Scoping Report as within the study area. It is suggested that there will be a 10m buffer zone from all watercourses. This is a welcomed approach. It should be noted that any works within the floodplain that are greater than 10m from top of bank would still be subject to Environmental Permitting Regulations 2016. Furthermore, any loss of floodplain would need to be compensated for.

Environmental Permitting – Flood Risk Activity Permit (FRAP)

The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)

- on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in the floodplain of a main river if the activity could affect flood flow or storage and potential impacts are not controlled by a planning permission

For further guidance please visit https://www.gov.uk/guidance/flood-risk-activities-environmental-permits.

If this type of permit is required, we advise the applicant to consult with us at the earliest opportunity.

**Flood Modelling**

For the most part the Environment Agency do not hold any detailed hydraulic modelling for the ordinary watercourses which bisect the Order limits for the development. The Environment Agency does hold some broadscale hydraulic modelling for the watercourse which runs near panel area A adjacent to Balsham Road (556470 east, 251730 north). This modelling was undertaken in 2023 for the Environment Agency by JBA Consulting using JFLOW 2d modelling software. The Environment Agency holds detailed hydraulic models and output data for Reach Lode, The Weirs, and Burwell Lode. This can be requested via enquiries_eastanglia@environment-agency.gov.uk.

Please note that the Environment Agency will shortly publish new risk of flooding from rivers and sea and surface water data at the end of January 2025. It would be sensible to review this data once available as the flood risk picture for the development area may change. Further details can be found online at: Updates to national flood and coastal erosion risk information - GOV.UK.

Careful consideration will need to be given to how the design flood level will be determined for infrastructure which may fall within flood risk areas. Typically, this would be determined by undertaking detailed hydraulic modelling or referring to existing detailed hydraulic modelling data (where available). The production of the new Risk of Flooding from Rivers and Sea dataset at the end of January 2025 may also provide some useful information. If a reliance is being placed on existing flood risk products such as the Risk of Flooding from Surface Water (RoFSW) mapping, then clear justification should be provided as to why this is a suitable proxy for representing fluvial flood risk taking into consideration the effects of climate change.

Unmapped Flood Zones

Section 5.2.33 notes that, given the limited extents of Flood Zone 2 and Flood Zone 3 within the site, any water sensitive critical components can be feasibly located

outside the Flood Zones including transformers, invertors, switchgear, BESS and substations. This is welcomed although please note, as highlighted in the Scoping Report there are some small ordinary watercourses which cross the site which have no associated Flood Zone mapping due to the small size of their respective catchments. There may be flood risk associated with watercourses which have smaller catchments, it is just not mapped or included within the Flood Map for Planning. Please bear this in mind when assessing flood risk to the proposed site.

We welcome the siting of the more critical elements such as the BESS within areas identified as Flood Zone 1.

Climate Change

Section 5.2.33 describes how limited extents of solar PV modules may be within Flood Zone 2 and Flood Zone 3. As this development would be classed as essential infrastructure the solar panels themselves should be designed such that they sit above the 1% (1 in 100) Annual Exceedance Probability (AEP) plus higher central climate change scenario with an allowance for freeboard (+600mm). Furthermore, as a sensitivity test the impacts of an upper climate change scenario on the development should also be assessed within the Flood Risk Assessment.

Given the design life of the development of 40 years we would recommend using the 2080's epoch for climate change. The impact of the solar panel supports and any other infrastructure on flood risk to third parties should be quantified within the Flood Risk Assessment. Where there are impacts to third parties these should be mitigated for using level for level and volume for volume compensation.

Culverts and Crossings

We would recommend against culverts for any crossings and would prefer the use of open-span structures such as bridges. Any proposed crossings should be designed so that the soffit level of any bridges sits above the design flood level. The design flood level for permanent crossings in this case would be the 1% (1 in 100) annual exceedance probability (AEP) plus higher central climate change scenario. For temporary crossings as part of the construction phase of the Scheme the present day (without climate change) 1% (1 in 100) AEP scenario can be used. For any permanent crossings, considering a proposed design life of the development of 40 years we would recommend using the 2080's epoch for climate change. Further details on climate change uplifts for watercourse (fluvial) flows can be found online at: Flood risk assessments: climate change allowances - GOV.UK

Guidance

The guidance on climate change allowances for flood risk assessment available online at Flood risk assessments: climate change allowances - GOV.UK provides steer with regards to climate change uplifts for different epochs. The guidance on using modelling for flood risk assessment available online at Using modelling for

flood risk assessments - GOV.UK provides some useful information and should be consulted.

**Groundwater and Contaminated Land**

We have reviewed the 'EIA Scoping Report' (December 2024) and provide the following comments in relation to the protection of controlled waters from a Groundwater and Contaminated Land perspective. We have paid particular attention to Chapter 2: Description of the Scheme, Chapter 4: Approach to the EIA, Chapter 5: Environmental Factors Proposed to be Scoped Out of Further Assessment and Chapter 6: Environmental Factors Proposed to be Scoped into Further Assessment.

Section 6.4.7, Description of Likely Significant Effects and 6.4.8, Receptors/matters to be scoped into further assessment, identify potentially significant effects with respect to soil, land quality and groundwater resulting from the Proposed Development, and identifies items to be Scoped In for further assessment. The following effects, which may impact groundwater quality, are proposed to be Scoped In:

- Land (potential contamination due to historic/current use encountered during construction);
- Groundwater (potential contamination due to historic/current use – phase(s) not specified);
- Land (potential contamination during construction phase);
- Groundwater (potential contamination during construction phase);
- Land (potential contamination during decommissioning phase);
- Groundwater (potential contamination during decommissioning phase).

We agree with the scoping in of the above impacts.

The list of key legislation and guidance relevant to ground conditions is presented in Section 6.4.11. This appears to include most documents we expect to see with respect to groundwater and contaminated land including EA Land Contamination Risk Management (LCRM). We recommend that this list should include The Environment Agency's Approach to Groundwater Protection and BS10175:2011+A2:2017 Investigation of potentially contaminated sites. Code of practice.

None of the proposed embedded 'primary' mitigation measures outlined in Section 4.8 would be inherently protective of groundwater quality, and depending on the proposed use of dispersed hardstanding areas the direction of runoff locally to ground could pose an increased risk of contamination in the absence of additional controls.

It is not clearly stated in the Scoping Report that the oOEMP will be developed into a detailed OEMP, although Section 6.1.6 appears to indicate this to be the case**.** We would like further clarification on this.

Site Characterisation

Section 6.4.5 describes the geological setting of the site.

*Developable Areas and Inter Array Connection Corridors*

The Scoping Report states that no mapped areas of artificial ground are identified within the Site, but that made ground may be present locally associated with mineral extraction sites or farm developments. Our records indicate the presence of localised patches of worked ground (undivided – void) in the southeastern part of Developable Area A and the south of Grid Connection Corridor A. Another worked ground (undivided – void) is shown immediately adjacent to the Site boundary at the edge of Developable Area C. Although these are listed as Voids in the BGS dataset, two of these features correspond to Wilbraham Chalk Quarry authorised landfill site and Land off Six Mile Bottom Road historic landfill site, indicating these may be partially or wholly infilled.

The report indicates superficial deposits to be largely absent beneath Developable Area and the Inter Array Connection Corridor areas. Lowestoft Formation (Diamicton Quaternary Glacial Deposits) are indicated on parts of the south and eastern parts of Developable Area A – West and B – Central, Inter Array Connection Corridor 1 and in the southern and eastern parts of Developable Area C – East and Inter Array Connection Corridor 2. These are designated as Secondary (undifferentiated) aquifer. Lowestoft Formation (Sand and Gravel deposits) are indicated beneath parts of Developable Area A – West. These are designated as a Secondary A aquifer.

Bedrock geology is indicated to principally comprise New Pit and Lewes Nodular Chalk formation, with Holywell Nodular Chalk Formation in the north-western parts of Developable Areas A – West and B – Central. These are all designated as Principal Aquifer.

*Grid Connection Corridors*

No mapped areas of artificial ground are identified, however the potential for localised made ground associated with mineral extraction sites and farm developments is raised. Superficial deposits are indicated to be largely absent, however Alluvial Fan deposits, head (clay, silt, sand and gravel), Alluvium (clay, silt, sand and gravel) and River Terrace deposits (sand and gravel) are indicated to be locally present, and peat deposits are identified in the northern part of Grid Connection Corridor A.

There are no active landfill sites within the Developable Area, however an authorised landfill site, Wilbraham Chalk Quarry is situated within Grid Connection Corridor A,

approximately 85m north of the boundary of Developable Area B - Central. Records indicate that there were no restrictions on waste sources at the landfill, but that explosive waste, gas cylinders, offal and clinical waste were prohibited. Our records indicate that the Wilbraham Chalk Quarry site holds a currently active environmental permit (JB3404FG), and while not currently receiving waste is constructing a new treatment plant (formerly EAWML 21029). The original environmental permit for the address (EAWML 70151) was transferred to EPR/NP3331MW/A001 in 2007, and subsequently transferred to JB3404FG in 2021.

Two historic landfill sites are stated to be present immediately adjacent to Developable Area C – East: 'Land off Six Mile Bottom Road' located to the west of West Wratting (receiving industrial, commercial and household wastes between 1966 and 1974), and 'Western Colville', for which little information is available but is listed in our records as having had a licence issued in August 1992. 'Land off Six Mile Bottom Road' landfill is situated immediately outside, and encircled by, the boundary of Developable Area C, with 'Western Colville' landfill lying within the boundary of Grid Connection Corridor B. Not mentioned in the Scoping Report, a linear historic landfill site, 'Mill Road', is also present within the southern part of Grid Connection Corridor A at Hall Farm Cottages and is recorded as having received industrial and commercial wastes (specifically 'general factory waste') between 1967 and 1968. This should be considered alongside the other historic landfill sites.

No significant pollution incidents to Controlled Waters have been recorded on site or within 1km of the Site, and two pollution incidents have been recorded within the Site boundary, both relating to minor incidents involving organic slurry waste.

The Study Area does not fall within a Coal Mining Reporting Area according to the Mining Remediation Authority.

Sections of all three Developable Areas, Inter Array Connection Corridor 1 and the Grid Connection Corridors are situated within a Zone 1 (Inner Protection Zone) of a groundwater Source Protection Zone (SPZ), associated with public potable water abstraction points. The entire Site area, excluding the northern part of the Grid Connection Corridor, falls within Zone 2 (Outer Protection Zone) and Zone 3 (Total Catchment) of a groundwater SPZ, with the majority of the Developable Area falling within SPZ2.

The majority of the Site is indicated to have high groundwater vulnerability, with locally medium to high groundwater vulnerability where superficial deposits are present. The south-eastern corner of the Site, corresponding to the north-eastern part of the Inter Array Connection Corridor between Developable Areas A and B, southern parts of Developable Area B and the south-eastern part of Developable Area C, corresponding to the mapped presence of superficial deposits of Diamicton, are recorded as medium groundwater vulnerability. The north-western portion of

Developable Area A, western portion of Developable Area B and southern part of Grid Connection Corridor A lie within a Drinking Water Groundwater Safeguard Zone, designated due to pressure from nitrate. The south-eastern portion of Developable Area C lies within a Drinking Water Surface Water Safeguard Zone, designated for the River Stour and Abberton Reservoir due to pressure from pesticides (metaldehyde and clopyralid). Although reference to a review of groundwater vulnerability mapping is indicated in the Report, no discussion of this is presented. The applicant should offer commentary on groundwater vulnerability.

There are no Main Rivers present within the Developable Area or Inter Array Connection Corridor areas of the Site, with the closest being the River Granta, approximately 2.6km south-west of Developable Area A. Two Main Rivers – The Weirs and Burwell Lode – are present within the northernmost portion of Grid Connection Corridor A. Several small water features are listed within the Site. Section 5.2.20 states that limited parts of the Site fall within Flood Zone 2 and Flood Zone 3. This matches our records.

No reference to the WFD Groundwater body underlying the site is provided in the Scoping Report. This should be considered as part of the assessment.

Approach to Scoping Report

Section 6.4.2 states that the study area used for land and soil assessment comprises the Site Boundary plus 250m buffer, and that groundwater receptors have been assessed using the Site Boundary plus a 1km buffer. In the context of the proposed development, we consider this to be a suitable approach.

Section 6.4.3 presents the data sources used to characterise the baseline condition of the site for the purposes of the Scoping Report, which includes a review of:

- Geological, hydrogeological, and groundwater vulnerability maps;
- Abstraction and discharge records relating to groundwater within the Developable Area and Inter Array Connection Corridors only;
- Publicly available historic mapping for the Developable Area and Inter Array Connection Corridors; and
- Data from Environment Agency, Local Authority and British Geological Survey (BGS).

Although the Report states that significant site-specific data have been obtained from an Envirocheck search targeting the Developable Areas, this information is not reproduced in the Scoping Report. We recommend that this information should be provided in support of the PEIR. Historic map and Envirocheck report data for the Grid Connection Corridors are stated to be absent pending refinement of the

preferred alignment of this feature. This section also states that a Preliminary Risk Assessment (PRA) report will be prepared in support of the DCO application.

Section 6.4.4 states that intrusive site investigation will be undertaken at an appropriate juncture as the Scheme is developed, and that the scope of the site investigation will be informed by the findings of the PRA. We welcome this approach and direct the applicant to ensure that the investigation is conducted in accordance with the requirements of relevant legislation and guidance documents. An informative on ground investigation is provided at the end of this section.

Section 6.4.11 states that a desk-based PRA survey will be prepared in support of the DCO application, which will assess the potential risks on the existing land, soil and groundwater baseline including contamination issues, and that the conclusions of the PRA and results of ground investigations will determine any necessary mitigation measures to ensure that the construction, operation and decommissioning of the Scheme do not result in significant effects on the receiving land and soil environment. At the time of production of the Scoping Report, the following difficulties and uncertainties are identified:

- Envirocheck search not yet carried out for Grid Connection Corridors – to be commissioned once preferred alignment defined;
- Site surveys not yet carried out on Grid Connection Corridors and Developable Area C – East, to be carried out following definition of preferred alignment;
- Data gaps identified in publicly available historic map records; and
- Intrusive site survey data not available – to be made available as works associated with Scheme progress.

It is recommended that the Desk Study is provided as a supporting document with the Environmental Statement. An informative about ground investigation for land quality investigation is provided at the end of this section. Should any potentially unacceptable risks to controlled waters be identified by the PRA presented in the Desk Study, further intrusive investigations should be undertaken to quantify the risk and enable refinement of the Preliminary Conceptual Site Model.

Table 6.4.4 states that a site walkover was carried out across Developable Areas A – West and B – Central, and the Inter Array Connection Corridor 1 in August 2024. However, no record of findings from the walkover survey is provided in the Scoping Report. We recommend that the site walkover (also referred to as Site Reconnaissance) is carried out in accordance with the recommendations of the Environment Agency's LCRM guidance and BS10175:2011+A2:2017, in particular to establish the potential for infilled ground to be present associated with the former gravel and chalk pits – see informative at the end of this section.

Based on a limited review of BGS borehole records it appears highly likely that the upper surface of the chalk bedrock would be encountered at foundation depth for most structures across the majority of the site. However, a thickness of Diamicton up to, and possibly in excess of 5m, may be present in the south and south-east of the Developable Area. Groundwater strike and rest level information provided on the logs indicate groundwater rest level in the chalk Principal Aquifer to be approximately 27-58m below ground level within the chalk bedrock, with strikes (likely perched water) recorded between approximately 1.2m and 5m in the Diamicton. The closest Environment Agency monitoring borehole at Cherry Tree Stud, near Great Wilbraham (National Grid Reference TL5662257740), approximately 3 km north of the site, shows groundwater rest levels within the chalk to have fluctuated between approximately 10.0m and 16.9m Above Ordnance Datum (mAOD) over the last five years, corresponding to local depths of between 10 and 17m below ground level. However, due to the distance to the Developable Area from this monitoring location and significantly different topographic setting the observations at Cherry Tree Stud may not be reflective of conditions on site, and the presence of surface water bodies in parts of the Developable Area and Cable Corridors may indicate the presence of near-surface groundwater.

Section 6.4.1 states that the applicant will consult with the Environment Agency, South Cambridgeshire District Council and East Cambridgeshire District Council as part of the land, soil and groundwater assessment. We recommend that Anglian Water and Cambridge Water are contacted to request details of assets and abstractions within the Study Area. The Environment Agency should be contacted to request data on licensed public water supply abstractions. Details on private water supplies should be requested from South Cambridgeshire District Council and East Cambridgeshire District Council. The scoping report does not presently state that unlicensed groundwater abstractions will be considered in the ES; this should be addressed.

BGS Mines and Quarries GIS dataset shows the presence of numerous former chalk and gravel pits across the Site and surrounding area, including two former chalk pits within the western part of Developable Area C – East, although the Scoping Report states no record of landfiling or areas of made ground has been identified for these features. Some of these may have been infilled with unknown materials following closure. Note that Drill Hill Chalk Pit, situated immediately outside the boundary of Developable Area C, is recorded as a historic landfill site (Land off Six Mile Bottom Road).

Except for reference to historic ground workings associated with chalk and gravel extraction, and historic and licensed landfill sites, the report does not present a summary of the site history or a discussion of potentially contaminative land uses either on-site or within a defined study area. Section 5.3.6 identifies several active

airfields within the wider surrounding area (Cambridge Airport, Duxford Aerodrome, Little Shelford Airfield, Newmarket Heath Airfield, Woodditton Airfield and Addenbrooke's Hospital Helipad, located between 7.3 km and 8.8km from the Site) which along with any historic airfields may be associated with PFAS usage.

The Report states that a number of documents will be proposed in support of the DCO application. Of these, the following are of particular importance with respect to groundwater quality. We are pleased to see that these are proposed to be produced, and look forward to reviewing the documents once available:

- Outline and subsequently detailed Construction Environment Management Plan (oCEMP and CEMP) (Section 2.9.11);
- Outline and subsequently detailed Operation Environment Management Plan (oOEMP and OEMP) (Section 2.10.7 and 6.1.6);
- Outline and subsequently detailed Decommissioning Environment Management Plan (oDEMP and DEMP) (Section 2.11.3 and 2.11.6);
- Water Framework Directive (WFD) Assessment (Section 4.11.1);
- Outline Soil Management Plan (oSMP) (Section 2.9.1);
- Outline Drainage Strategy (Section 2.7.37);
- Outline Surface Water Management Plan (oSuWMP) (Section 5.2.33);
- Outline Battery Safety Management Plan (oBSMP) (Section 2.7.19); and
- HDD Fluid Breakout Plan (Section 5.2.33 - if HDD is required).

Section 6.4.6 outlines additional mitigation measures to be employed at the site during the construction (via oCEMP and oSMP), operation (via oOEMP) and decommissioning (via oDEMP) phases of the development. Specific mitigation mentioned includes segregation of surface water and foul drainage during construction works, restricting concrete mixing to designated areas to minimise potential impact on watercourses, emergency procedures to manage accidental spillages and leaks, and procedures to manage contaminated land and erosion. We recommend that the CEMP and DEMP should also incorporate the requirement for a Watching Brief for unexpected contamination, and a Discovery Protocol to establish the investigation and mitigation measures and notifications to be applied under such circumstances. We suggest that these documents should also outline the methods to be applied to prevent contamination and cross contamination of soils and surface and groundwater should any sources of pollution be identified.

<u>Impacts</u>

Table C7 and C8 present a list of receptors ranked by importance respective to land and soil and groundwater respectively, however no reference to potable water abstraction or secondary aquifer types is made in Table C8. The sensitive controlled water receptors which have been considered in the Scoping Report should be clearly stated and assigned sensitivity categories. This should include:

- Aquifer designations;
- Source Protection Zones; and
- Private and public groundwater abstractions.

There is potential for pollution of the water environment due to abnormal and emergency situations at Battery Energy Storage System (BESS) developments, in particular fires. This would be exacerbated if in a vulnerable groundwater location. There is a risk that highly polluting chemicals in batteries could enter groundwater in firewater or rainfall. Applicants should assess risks to groundwater and ensure mitigation is in place for containment of this water.

While in the event of a fire at a BESS, it is accepted best practice to let the containers on fire burn out, it is likely water will be used to cool neighbouring containers. This water could enter burning containers through surface run off or directly from spray cooling neighbouring containers. Furthermore, during or following a fire at a BESS development, rainwater could enter exposed containers through the period of time it takes to remove or cover burnt out containers.

There must be a sealed drainage system in place to adequately contain and manage any fire-fighting effluent or contaminated surface waters generated by a fire at the site, to ensure that there is no discharge of polluted water to ground or surface water bodies. Any BESS compound(s) should furthermore be preferentially sited away from sensitive controlled water receptors, including areas of high groundwater vulnerability. The entire site is underlain by a Principal aquifer used to supply public water abstraction (with the entire Developable Area and surrounding area, including the southern and central parts of the Grid Connection Corridors comprising SPZ 1, 2 or 3). BGS mapping and borehole records indicate this to directly underlie the majority of the Site or be covered by a thin superficial layer. Due to the high sensitivity of this receptor and the risk of contaminative impact by spills or leaks, or infiltration of fire water, we urge the applicant to position the BESS away from SPZ1 and SPZ2 preferably on the relatively low permeability Lowestoft Formation – Diamicton deposits present in the south of Developable Area B and south-east of Developable Area C. Confirmation is requested that the BESS flood protection systems and proposed fire-water containment system would be sufficient to prevent impacts on groundwater quality in the reasonable worst-case event of a combined flood event and catastrophic BESS fire.

See also the Informative from National Fire Chief's Council (NFCC) at the end of this section, to which it is understood the applicant intends to adhere.

The applicant should provide the proposed outline Drainage Strategy which should satisfactorily demonstrate that the risks to controlled waters have been fully understood and can be addressed through appropriate measures.

This information should include, but not be limited to:

- A detailed drainage plan which demonstrates, in the event of an emergency, that contaminated firewater can be adequately contained within the site to ensure that there is no discharge of polluted water to ground or surface water bodies.
- The Scheme should include an impermeable base or layer beneath the battery unit compound to ensure infiltration beneath the site can be controlled.
- Any system for the storage of contaminated firewater should have sufficient capacity/headroom for the volumes expected in the event of a fire, even during periods of intense rainfall.

The system for containing firefighting effluent should be automatic with a backup system in place in case of power failure.

The Scoping Report does not clearly state the full range of activities and proposed structures relating to the Proposed Development which could impact on water resources and ground conditions during the Construction, Operation and Decommissioning phases, such as disturbance of potentially contaminated soils and the creation of new contamination pathways as a result of foundation works or HDD activities, or spills, leaks and generation of other fugitive emissions such as fire water in the event of a catastrophic fire. These should be clearly defined by the applicant.

Although reference to Sustainable Drainage Systems (SuDS) is noted in the Scoping Report Glossary of Terms, and reference to reduction of surface water runoff rates is indicated in the Embedded Measures proposed to be applied to the project, no specific stated intent to adopt SuDS is noted in the report. We would encourage the use of SuDS in the Proposed Development. An Informative relating to SuDS is presented at the end of this section.

In accordance with Statement C5 of the Environment Agency's Approach to Groundwater Protection, the Environment Agency does not support pipelines or fluid-filled cables that transport pollutants, particularly hazardous substances that:

- Pass through SPZ1 or SPZ2 where this is avoidable;
- Are below the water table in principal or secondary aquifers.

Where there is an unavoidable need for pipelines or fluid-filled cables to pass through SPZ1 or SPZ2, operators are expected to adopt BAT and operate in accordance with the Energy Networks Association guidance.

The applicant should confirm whether underground fluid-filled cables are proposed as part of the design of the Proposed Development, and if so should demonstrate that the installation of such cables cannot be substituted. If fluid filled cables are proposed this would not be acceptable, as these would pose an ongoing and unmanaged potential source of contamination to the Principal aquifer, SPZ and associated public water supply abstraction. Note that the Environment Agency expects operators to carry out a site-specific risk assessment prior to the decommissioning of fluid-filled cables in SPZ1 and SPZ2, and will work with operators to agree the best available environmental option.

The Scoping Report states in Section 2.11.2 that during decommissioning any underground cable sections would be removed rather than being left in situ unless designations or environmental sensitivities determine otherwise. We are pleased to see this consideration.

The Report makes no mention of dewatering excavations. The EIA should fully assess whether any de-watering will be required in order to lay subsurface infrastructure and foundations. If de-watering may be required, the amount (rates and duration) of dewatering required for EACH associated infrastructure (or specified length of infrastructure) should be assessed. Methods of de-watering to lay infrastructure should also be detailed. It should then be assessed as to whether the de-watering for the construction of the infrastructure will require an abstraction licence (as per water Act 2005) or whether it will be covered by the construction de-watering exemption regulations (2017). This should be assessed at the EIA stage to avoid issues further down the line and bearing in mind the process to gain any abstraction licence required for construction de-watering can be lengthy. A twin tracked approach between planning and permitting is recommended. If de-watering is or may be required then a Hydrogeological impact assessment should be produced as part of the EIA to show the potential impact on identified water features and protected rights (including licenced and unlicenced abstractions). Should this be required, dewatering may require an abstraction licence, and information about this is provided at the end of the response.

The rivers emerging to the west and north of the Site are chalk fed streams (The Lodes, New River, Little Wilbraham River/Quy Water and River Cam), some of which are fed by ordinary watercourses which pass through the Developable Area. Fulbourn Fen SSSI, located approximately 3km West of the Developable Area, is dependent on chalk groundwater. A number of the chalk streams are supported by the Lodes Granta River Support Scheme, established in the 1970s/80s to mitigate the impact of groundwater abstraction on these water bodies, which illustrates both

the vulnerability and utilisation of the aquifer, and the significant interaction between groundwater and surface water. The River Granta, located approximately 2.6 km south of the Developable Area, is fed by an unnamed stream originating in the southern part of Developable Area C. The River Granta is designated a flagship chalk catchment as part of the Chalk Stream Restoration Group's Chalk Stream Strategy and as such is subject to significant scrutiny. Whilst no Main Rivers are present within the Developable Area, watercourses within this part of the site are likely to be chalk fed, most of which feed into chalk fed Main Rivers. As such we consider these to be vulnerable to contaminative impact.

HDD may be locally applied at key crossing points. This work could involve the use of drilling muds, and their use may require risk assessment to ensure they do not pose a risk to controlled waters. If HDD is proposed to be used to cross watercourses the Applicant would need to assess whether this would affect local licensed or unlicenced abstractions by carrying out a water feature survey. We therefore consider that the EIA should include potential impacts from directional drilling and any foundation works that may be required and any other elements of the construction may have the potential to cause or mobilise contamination. Due to the anticipated presence of Principal aquifer immediately underlying the Site, or otherwise at shallow depth, coupled with the use of this resource to support public water supply abstraction and the high sensitivity of surface watercourses, we consider that a Hydrogeological Risk Assessment should be produced to support all proposed HDD works within a groundwater SPZ and/or Principal Aquifer. Due to the likelihood of hydraulic continuity between the underlying Principal chalk aquifer and surface water, we also expect that the applicant will be able to demonstrate for all river crossings required for the Scheme, that the proposed methods would not negatively impact groundwater quality or quantity, and that due consideration has been taken with respect to the need for, and quantity of, dewatering which may be required.

Section 2.7.8 states that the mounting structure for PV panels would be secured by metal posts driven or screwed to an anticipated maximum depth of 1.5m. Foundation details for other proposed structures forming the Proposed Development, including substations, BESS compounds, inverters and overhead line towers are not currently available, and it is presumed these may involve piling or deep foundation works. These activities may result in the introduction of a preferential flow pathway for any mobile shallow contamination which may be present through lower permeability strata (where present) into the Principal aquifer. Due to the high sensitivity of groundwater resources at the site, a Foundation Works Risk Assessment should be produced to ensure the use of piling methodology that minimises the likelihood of creating a pollution pathway to groundwater.

Land Contamination Assessments

We expect land contamination assessments to follow the tiered approach laid out in our Land Contamination Risk Management (LCRM) guidance. The preliminary risk assessment (PRA) should include historical plans of the site, an appraisal of the environmental setting (including geology, hydrogeology, groundwater and surface water receptors, potential contaminants of concern and source areas), an initial conceptual site model (CSM) describing possible pollutant linkages for controlled waters, and identification of potentially unacceptable risks. Land contamination investigations should be undertaken by suitably qualified and experienced professionals and in accordance with BS 5930: Code of practice for ground investigations and BS 10175: Investigation of potentially contaminated sites – code of practice. Soil and water analysis should be fully MCERTS accredited. Investigation, demolition, remediation, or construction works must not create new pathways or linkages to controlled waters. Clean drilling techniques may be required for boreholes that penetrate contaminated ground.

Groundwater related Environmental Permits

If dewatering is required, the applicant may require an abstraction licence if it doesn't meet the exemption in The Water Abstraction and Impounding (Exemptions) Regulations 2017 Section 5: Small scale dewatering in the course of building or engineering works.

If the applicant does not meet the exemption and requires a full abstraction licence, they should be aware that some aquifer units may be closed for new consumptive abstractions in this area. More information can be found on our website: Abstraction licensing strategies (CAMS process) - GOV.UK (www.gov.uk) and Apply for a water abstraction or impounding licence - GOV.UK (www.gov.uk)

Please note that the typical timescale to process a licence application is 9-12 months. The applicant may wish to consider whether a scheme-wide dewatering application rather than individual applications would be beneficial. We suggest talking to our National Permitting Service early in the project planning.

Temporary dewatering of wholly or mainly rainwater that has accumulated in an excavation may be exempt from an Environmental Permit for a Water Discharge Activity. More information can be found on our website: Temporary dewatering from excavations to surface water: RPS 261 - GOV.UK (www.gov.uk). Note that this does not permit discharge of groundwater from a passive or active dewatering activity, or permit the abstraction of groundwater.

The applicant may also need to consider discharge of groundwater, especially if it is contaminated. More information can be found on our website: Discharges to surface water and groundwater: environmental permits - GOV.UK (www.gov.uk)

The use of drilling muds for any necessary directional drilling may require a groundwater activity permit unless the ‘de minimis’ exemption applies. Early discussion about this is also recommended.

General guidance for BESS developments
In line with planning practice guidance:

Applicants are encouraged to engage with Local Fire & Rescue Services to ensure issues of siting and location of BESS are dealt with before applications are made. Ideally this should be done before submitting a planning application.

Local planning authorities are encouraged to engage with Local Fire & Rescue Services and to refer to guidance produced by the National Fire Chiefs Council for consideration when determining applications.

Applicants will also need to comply with relevant Building Regulations in Part B. They require applicants to provide suitable access for the fire service.

Applicants should also refer to guidance published by The Department for Energy Security and Net Zero: Health and safety in grid scale electrical energy storage systems, which provides guidance on a number of topics related to health and safety including on 'Design and planning' that provides guidance on battery technology, site selection, site layout and emergency planning. It also includes a section on ‘Decommissioning and end of life’, including dealing with batteries that have come to the end of their use in the BESS.

Boreholes to abstract water in the event of a fire – groundwater investigation consents
The Environment Agency regulates the abstraction of water from surface water and underground sources. An abstraction licence is not needed to install and test a borehole solely for the purpose of firefighting (including training and testing). It is recommended the operator of the site obtains a groundwater investigation consent (under section 32/3 of the Water Resources Act 1991) so they can find out whether there is adequate water available. See https://www.gov.uk/government/publications/apply-for-consent-to-investigate-a-groundwater-source/apply-for-consent-to-investigate-a-groundwater-source for further information.

Emergency response / contingency plan
As such each site and each site operator which has a BESS installation should have emergency response/contingency plans which detail how those risks as above will be managed and environmental impacts prevented, reduced, removed or contained.

The Department for Energy Security and Net Zero: Health and safety in grid scale electrical energy storage systems, provides guidance on emergency planning.

Any plan for each site must include the EA Incident Number 0800 80 70 60 for prompt operator reporting so that the EA can risk assess the incident and risk to the environment.

Sustainable drainage systems

The Government's expectation is that sustainable drainage systems (SuDS) will be provided in new developments wherever this is appropriate. The Environment Agency supports this expectation. Where infiltration SuDS are to be used for surface run-off from roads, car parking and public or amenity areas, they should:

- be suitably designed
- meet Governments non-statutory technical standards for sustainable drainage systems – these standards should be used in conjunction with the National Planning Policy Framework and Planning Practice Guidance
- use a SuDS management treatment train – that is, use drainage components in series to achieve a robust surface water management system that does not pose an unacceptable risk of pollution to groundwater

Where infiltration SuDS are proposed for anything other than clean roof drainage in a SPZ1, a hydrogeological risk assessment should be undertaken, to ensure that the system does not pose an unacceptable risk to the source of supply.

See the Environment Agency's approach to groundwater protection, position statement G13: Groundwater protection position statements - GOV.UK (www.gov.uk)

**Surface Water Quality**

Although we acknowledge that there are no designated Main Rivers present within the Developable Area, the presence of several ordinary watercourses ultimately feeding into chalk fed Main Rivers is noted within this part of the Site. These could potentially be impacted by construction and decommissioning works, which the applicant identifies would be mitigated by measures outlined in the oCEMP and oDEMP. However, we have an outstanding concern for the construction phase relating to the potential for HDD to impact surface water quality if insufficiently designed and managed, and further detail on the proposed mitigation to be employed to protect these receptors is requested.

**Biodiversity**

Assessment and Methodology

The proposed WFD assessment described in Section 4.11 should consider impact pathways associated with waterbodies connected to the WFD waterbodies, but not

formally part of them (e.g. drainage ditches). These may represent habitat for aquatic species and a pathway for pollution. Enhancement of these habitats including alterations to management could benefit the WFD waterbodies.

The Scoping Report does not provide full survey methods on the surveys proposed or undertaken (Section 6.1.4); therefore, it has not been possible to comment on their appropriateness. Similarly, the full Preliminary Ecological Appraisal report of Area A and B has not been provided for review.

Only a small proportion of the total boundary has been subject to field survey to date, with desk-based assessment informing the remainder. It is therefore possible that additional ecological features relevant to the scope of assessment may be identified.

Watercourse habitats within Developable Areas C and Grid Connection Corridors have not been assessed. Further consultation may be appropriate when this information is available, alongside more detailed development proposals.

Biodiversity Net Gain and Environmental Enhancements

Headwaters of the River Stour run through Developable Area C and Burwell Lode and tributaries are located in the north of the Grid Connection Corridor A. It is recommended that opportunities for enhancement of these watercourses and associated riparian zones should be investigated. Similarly, enhancement of smaller watercourses/ ditches and associated buffer zones may be achievable and would be encouraged.

We welcome commitment of the development to deliver at least 10% Biodiversity Net Gain (BNG). The development should seek to support objectives of the emerging Cambridge and Peterborough Local Nature Recovery Strategy, with specific regard to watercourse units, and exploring opportunities via local catchment partnerships and Catchment Based Approach catchment management plans is advised.

The local catchment partnership, CamEO, have produced a catchment plan. We encourage the applicant to consider this as part of their project to support enhancement. The catchment partnership could also bring together other stakeholders to support a plan for improvement.

The applicant could identify the waterbodies, and the status of those waterbodies, in and adjacent to the development and progress improvement opportunities to improve the status in these waterbodies.

**Fisheries**

The Environment Agency should be included as a consultee to be engaged with given that fish species are within the scope and there are designated statutory main watercourses within the proposed Order limits.

We agree with the proposed study areas and approach to surveys where they relate to fisheries.

Section 6.1.3 Data sources to inform the EIA baseline characterisation should also include freely available Environment Agency fish survey data. Please see: Freshwater fish surveys (NFPD) - data.gov.uk

We are pleased to see that an oCEMP will be produced, however there is the risk that the oCEMP will be too high level or generic and lack specific mitigation necessary for fish. We would expect as detailed mitigation as possible to be presented in the oCEMP.

**Geomorphology**

Crossings/Culverts

The applicant mentions a possible upgrade to river crossings/culverts (Section 2.9.1). This will have a direct impact on any waterbodies concerned and is noted within in the “elements scoped in” section (Chapter 6 – 6.1.2).

It is possible that the connection corridors will utilise overhead lines. Whilst these can cross rivers without impacting the channel, pylons can still be located within the floodplain which can bring issues with positioning if the activity/mobility of the watercourse is not taken into account, especially in areas with more varied topography.

Within the array sites there may also be a need to cross watercourses for access or cable connection, and the access track locations/routes also have not been confirmed (Section 2.7.33), with details being provided in the Environmental Statement.

Biodiversity Net Gain

With regards to Biodiversity, Biodiversity Net Gain (BNG) is mentioned, but only terrestrial components. The watercourse metric is not mentioned at all despite several watercourses being present within the development boundary, and more specifically within the array areas. If this application is still within the DCO process when BNG becomes mandatory, the applicant will need to survey/place a value on watercourses and achieve a minimum of 10% uplift.

**Water Resources**

We are encouraged by the recognition that the region is water scarce and the relevance to water company supply is acknowledged by the report in Chapter 5. The Rivers Cam, Granta and tributaries have measures identified which are designed to improve flows and restore a sustainable balance of groundwater abstraction through changes to water company licences. As a result, water companies in this region are

already unable to supply new non-domestic demands in targeted areas. We recommend that the availability of supply to any non-domestic development be explicitly checked with the water company.

We agree that the project is likely to have low water use during the operational and decommissioning phase. Given the water scarcity in this region, we cannot yet determine the potential impacts (with regards to significance and time scale) of the consumptive uses of water required during the construction phase as potential sources of supply and their viability have not yet been determined.

Should water company supply not be available to the project during construction, other sources of supply should be explored. New consumptive groundwater licences are not available, any dewatering for example would need to demonstrate that it is non-consumptive (returned to the local environment without intervening use) in order to obtain an abstraction licence.

Surface water abstraction will be subject to conditions which restrict access to water to periods of high flow. The use of surface water on site may therefore need to consider storage to meet demand outside of these periods.

The Scoping Report goes some way to identify the water demands during construction which include plant cleaning and dust suppression. We also recommend that water demand for any concrete production and bentonite clay mixing and driving of horizontal directional drilling is also considered.

A basic water supply strategy should evaluate all water consumptive activities and could provide a rough estimate of typical quantities required. This could also include an options appraisal of the sources of supply available in proximity to the site. More information on availability and potential licence conditions can be found in the Abstraction licensing strategy for this catchment. We recommend that this assessment be undertaken early in the planning process as the determination and associated time scales for permitting requirements at a later stage should not be underestimated. An options appraisal now may help to expedite the permitting process ahead of commencement of the construction phase.

**Waste**

Management of end of life industrial batteries

Battery energy storage systems (BESS) facilities are not regulated under the Environmental Permitting Regulations regime.

However, battery storage falls within the scope of the UK's producer responsibility regime for batteries and other waste legislation. This creates additional lifecycle liabilities which must be understood and factored into project costs.

Batteries have the potential to cause harm to the environment if stored inappropriately e.g. subject to a fire as the chemical contents escape from the casing. When a battery within a battery storage unit ceases to operate, it will need to be removed from site and dealt with in compliance with waste legislation. The party discarding the battery will have a waste duty of care under the Environmental Protection Act 1990 to ensure that this takes place.

The Waste Batteries and Accumulators Regulations 2009 also introduced a prohibition on the disposal of batteries to landfill and incineration. Batteries must be recycled or recovered by approved battery treatment operators or exported for treatment by approved battery exporters only.

Many types of batteries are classed as hazardous waste which creates additional requirements for storage and transport.

Manufacturing Waste

Solar panels, inverters, and other components produce waste during their manufacturing process. This includes materials like silicon, glass, metals, and chemicals. Although this waste is not directly generated on-site, its lifecycle impact should be considered as part of the environmental assessment of the project.

Decommissioning Waste

When a solar farm is decommissioned, not only do the panels need managing, but also other infrastructure like frames, cables, inverters, and batteries (if used for energy storage). This phase involves dismantling and disposing of or recycling these materials. The process can generate significant waste if not handled correctly, particularly with components that might be considered hazardous or difficult to recycle.

Construction Waste

During the construction phase, there may be waste from packaging materials, offcuts of materials used for mounting structures, excess concrete, and soil from earthworks. These need to be managed in compliance with waste regulations to minimize environmental impact and a permit may be required (Waste: environmental permits - GOV.UK). Dust mitigation and noise should be appropriately considered.

Regulatory Compliance

All waste management must comply with UK environmental regulations, which dictate how hazardous and electronic waste should be handled, transported, and disposed of or recycled. This includes adherence to the Waste Electrical and Electronic Equipment (WEEE) Directive for recycling solar panels although this site is likely to fall under the definition of a *Large-Scale Fixed Instillation*. See Electrical and electronic equipment (EEE) covered by the WEEE Regulations - GOV.UK

Land Restoration

After decommissioning, the land must be restored to its previous condition or a suitable alternative use. This involves managing any residual waste or contamination that might have occurred during the operational life of the solar farm. Consideration should be given to: Planning and aftercare advice for reclaiming land to agricultural use - GOV.UK

Waste related Environmental Permits

The following guidance covers waste authorisations only:
https://www.gov.uk/guidance/waste-environmental-permits

Movement of waste off-site – Duty of Care

The Environmental Protection (Duty of Care) Regulations 1991 for dealing with waste materials are applicable to any off-site movements of wastes.

The code of practice applies to you if you produce, carry, keep, dispose of, treat, import or have control of waste in England or Wales.

The law requires anyone dealing with waste to keep it safe and make sure it's dealt with responsibly and only given to businesses authorised to take it. The code of practice can be found here:
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/506917/waste-duty-care-code-practice-2016.pdf

If you need to register as a carrier of waste, please follow the instructions here:
https://www.gov.uk/register-as-a-waste-carrier-broker-or-dealer-wales

Waste on site – contaminated land

Excavated materials that are recovered via a treatment operation can be re-used on-site under the CL:AIRE Definition of Waste: Development Industry Code of Practice. This voluntary Code of Practice provides a framework for determining whether excavated material arising from site during remediation or land development works are waste.

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on-site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

The Environment Agency recommends that developers should refer to:

- CL:AIRE Definition of Waste: Code of Practice
- EA Regulatory Position Statement 215: Treating small volumes of contaminated soil and groundwater

Waste to be taken off site – contaminated land

Contaminated soil that is, or must be, disposed of, is waste. Therefore, its handling, transport, treatment and disposal is subject to waste management legislation, which includes:

- Duty of Care Regulations 1991
- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Permitting (England and Wales) Regulations 2010
- The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standards BS EN 14899:2005 'Characterisation of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan'. The permitting status of any proposed treatment or disposal activity should be clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

If the total quantity of waste material to be produced at or taken off site is hazardous waste and is 500kg or greater in any 12-month period, the developer will need to register with us as a hazardous waste producer. Refer to our website at www.gov.uk/government/organisations/environment-agency for more information.

Movement of waste off-site – Duty of Care & Carriers, Brokers and Dealers Regulations Characterisation and classification of waste

In order to meet the Applicant's objectives for the waste hierarchy and obligations under the duty of care, it is important that waste is properly classified. Some waste (e.g. wood and wood based products) may be either a hazardous or non-hazardous waste dependent upon whether or not they have had preservative treatments.

Proper classification of the waste both ensures compliance and enables the correct onward handling and treatment to be applied. In the case of treated wood, it may require high temperature incineration in a directive compliant facility. More information on this can be found here: https://www.gov.uk/how-to-classify-different-types-of-waste

Use of waste on-site – authorisation or permit required

If materials that are potentially waste are to be used on-site, the Applicant will need to ensure they can comply with the exclusion from the Waste Framework Directive (WFD) (article 2(1) (c)) for the use of, 'uncontaminated soil and other naturally occurring material excavated in the course of construction activities, etc…' in order for the material not to be considered as waste. Meeting these criteria will mean waste permitting requirements do not apply.

Where the Applicant cannot meet the criteria, they will be required to obtain the appropriate waste permit or exemption from the Environment Agency.

A deposit of waste to land will either be a disposal or a recovery activity. The legal test for recovery is set out in Article 3(15) of WFD as:

- any operation the principal result of which is waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfil a particular function, or waste being prepared to fulfil that function, in the plant or in the wider economy.
- We have produced guidance on the recovery test which can be viewed at https://www.gov.uk/government/publications/deposit-for-recovery-operators-environmental-permits/waste-recovery-plans-and-deposit-for-recovery-permits#how-to-apply-for-an-environmental-permit-to-permanently-deposit-waste-on-land-as-a-recovery-activity.

You can find more information on the Waste Framework Directive here: https://www.gov.uk/government/publications/environmental-permitting-guidance-the-waste-framework-directive

More information on the definition of waste can be found here: https://www.gov.uk/government/publications/legal-definition-of-waste-guidance

More information on the use of waste in exempt activities can be found here: https://www.gov.uk/government/collections/waste-exemptions-using-waste

Non-waste activities are not regulated by us (i.e. activities carried out under the CL:ARE Code of Practice), however you will need to decide if materials meet End of Waste or By-products criteria (as defined by the Waste Framework Directive). The 'Is it waste' tool, allows you to make an assessment and can be found here: https://www.gov.uk/government/publications/isitwaste-tool-for-advice-on-the-by-products-and-end-of-waste-tests

The direct link to CLA:RE can be found here: https://www.claire.co.uk/projects-and-initiatives/dow-cop

The waste hierarchy and resource management in relation to construction wastes
The developer must apply the waste hierarchy as a priority order of prevention, re-use, recycling before considering other recovery or disposal options. Government guidance on the waste hierarchy in England can be found here: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69403/pb13530-waste-hierarchy-guidance.pdf

Site Waste Management Plans (SWMP) are no longer a legal requirement, however, in terms of meeting the objectives of the waste hierarchy and your duty of care, they are a useful tool and considered to be best practice.

Management and reporting systems

Where a development involves any significant construction or related activities, we would recommend using a management and reporting system to minimise and track the fate of construction wastes, such as that set out in PAS402: 2013, or an appropriate equivalent assurance methodology. This should ensure that any waste contractors employed are suitably responsible in ensuring waste only goes to legitimate destinations.

If Environment Agency permit/authorisation is required, we recommend engaging with our National Permitting Service as early as possible**.** Please also see the following pre-application advice: https://www.gov.uk/guidance/get-advice-before-you-apply-for-an-environmental-permit

## Patten, Jack

**From:** Mailbox - North West Group SDP <NorthWestGroupSDP@essex-fire.gov.uk>
**Sent:** 17 December 2024 10:33
**To:** Kingsway Solar Farm
**Subject:** RE: EN010165 - Kingsway Solar Farm - EIA Scoping Consultation and Notification

**Follow Up Flag:** Follow up
**Flag Status:** Flagged

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Good morning

Im afraid this is for London area

Kind regards

Kerry

**Kerry Chalk**
**North West Group SDP (Delivery)**
Protection
Essex County Fire and Rescue Service
Harlow Central Fire Station
Fourth Avenue,
Harlow,
Essex CM20 1DU
Tel: [redacted]

Email: northwestgroupsdp@essex-fire.gov.uk
Web: essex-fire.gov.uk

---

**From:** Kingsway Solar Farm <SM-KingswaySolar@planninginspectorate.gov.uk>
**Sent:** 17 December 2024 10:19
**Subject:** EN010165 - Kingsway Solar Farm - EIA Scoping Consultation and Notification

Dear Sir/Madam,

Please see attached correspondence on the proposed Kingsway Solar Farm.

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **14 January 2025**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards

Jack Patten

The Planning Inspectorate

**Jack Patten** (He/Him)
EIA Advisor
The Planning Inspectorate

@PINSgov The Planning Inspectorate planninginspectorate.gov.uk

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Fenland
CAMBRIDGESHIRE
Fenland District Council

100% people driven

Contact: Danielle Brooke
Development Services
Direct Dial Tel: [redacted]
E-mail: [redacted]

The Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

Our ref: F/YR24/4057/LACON
Your ref: EN010165

20 December 2024

Dear Sir/Madam,

**Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11**

**Application by Kingsway Solar Farm Limited (the Applicant) for an Order granting Development Consent for Kingsway Solar Farm (the Proposed Development)**

Thank you for your consultation in reference to the above. In response to this consultation the Local Planning Authority have no comments to make.

Yours sincerely

[redacted]

Danielle Brooke SB
Senior Development Officer

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To provide you with our services we need to record personal information, such as your name and address. This information will be kept securely and only accessed by approved staff.

**Patten, Jack**

**From:** Squire, Sandra <[redacted]
**Sent:** 14 January 2025 12:58
**To:** Kingsway Solar Farm
**Subject:** Kingsway Solar Farm EIA Scoping Consultation - EN010165

**Follow Up Flag:** Follow up
**Flag Status:** Flagged

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Thank you for consulting the Forestry Commission on this application.

As a Non-Ministerial Government Department, the Forestry Commission provide no opinion supporting or objecting to an application. Rather we provide advice on the potential impact that the proposed development could have on trees and woodland including ancient woodland.

There are no ancient woodlands within the proposed site, however Hill Croft ancient semi natural woodland is adjacent to the site, with several others in close proximity. The scoping document does not identify any ancient or veteran trees, however there may be some that are as yet unidentified by the Ancient Tree Inventory.

**Ancient Woodland:**

Ancient woodlands are an irreplaceable habitat. They have great value because they have a long history of woodland cover, being continuously wooded since at least 1600AD with many features remaining undisturbed. This applies equally to Ancient Semi Natural Woodland (ASNW) and Plantations on Ancient Woodland Sites (PAWS).

Section 5.4.32 of EN-1 – The Overarching National Policy Statement for Energy states:

"*Applicants should include measures to mitigate fully the direct and indirect effects of development on ancient woodland, ancient and veteran trees or other irreplaceable habitats during both the construction and operational phases"*

Section 5.4.53 goes on to state:

"*The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of any irreplaceable habitats, including ancient woodland, and ancient and veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists"*

We would particularly refer you to further technical information set out in Natural England and Forestry Commission's Standing Advice on Ancient Woodland – plus supporting Assessment Guide and "Keepers of Time" – Ancient and Native Woodland and Trees Policy in England.

The Standing Advice states that proposals should have a buffer zone of **at least** 15m from the boundary of ancient woodlands to avoid root damage which can result in loss or deterioration of the woodland. Where assessment shows impacts are likely to extend beyond this distance, you're likely to need a larger buffer zone. For example, the effect of air

pollution from development that can result from a significant increase in traffic or dust from construction.

There is a need to consider both the direct and indirect impacts resulting from construction.

Direct impacts can include, but are not limited to, damaging or compacting soil, damaging functional habitat connections and changing the woodland ecosystem by removing the woodland edge or thinning trees. Indirect impacts can also include increasing the amount of dust, light, air or soil pollution and changing the landscape character of the area.

We would expect to see a detailed assessment of any impacts to the ancient woodland, including details of measures to be taken to reduce and mitigate any effect. Protection measures include taking care not to cut tree roots (e.g., by trenching) or causing soil compaction around trees (e.g., through vehicle movements or stacking heavy equipment) or contamination from poisons (e.g., site stored fuel or chemicals) and fencing off these areas to prevent unintended incursions into the root protection zone as well as dust prevention measures to reduce any potential impact of dust pollution.

Due to the irreplaceable nature of ancient woodland, most temporary effects will result in irreplaceable damage.

**Priority Habitat:**

We note there are numerous areas of mixed deciduous woodland within the site area.

Mixed Deciduous woodlands are on the National Forest Inventory and the Priority Habitat Inventory (England).

They were recognized under the UK Biodiversity Action Plan as being the most threatened, requiring conservation action. The UK Biodiversity Action Plan has now been superseded but this priority status remains under the Natural Environment & Rural Communities Act 2006. (NERC) Sect 40 "Duty to conserve and enhance biodiversity" and Sect 41 – "List of habitats and species of principle importance in England".

Section 5.11.27 of EN-1 of the Overarching National Policy Statement for Energy states:

"*Existing trees and woodlands should be retained wherever possible…….The applicant should assess the impacts on, and loss of, all trees and woodlands within the project boundary and develop mitigation measures to minimise adverse impacts and any risk of net deforestation as a result of the scheme. Mitigation may include, but is not limited to, the use of buffers to enhance resilience, improvements to connectivity and improved woodland management. Where woodland loss is unavoidable, compensation schemes will be required, and the long term management and maintenance of newly planted trees should be secured"*

Fragmentation is one of the greatest threats to mixed deciduous woodland. Woodlands can suffer loss or deterioration from nearby development through loss of connectivity, damage to soils, roots and vegetation and changes to drainage and air pollution from an increase in traffic or dust, particularly during the construction phase of a development.

For any woodland within the development boundary, land required for temporary use or land where rights are required for the diversion of utilities, the Root Protection Zone must be taken into consideration. The Root Protection Zone (as specified in British Standard 5837) is there to protect the roots of trees, which often spread out further than the tree canopy.

Protection measures include taking care not to cut tree roots (e.g., by trenching) or causing soil compaction around trees (e.g., through vehicle movements or stacking heavy

equipment) or contamination from poisons (e.g., site stored fuel or chemicals) and fencing off these areas to prevent unintended incursions into the root protection zone.

**Net Deforestation and Tree Planting:**

It is expected that there will be a thorough assessment of any loss of all trees within the project boundary and the development of mitigation measures to minimise any risk of net deforestation because of the scheme.

Hedgerows, individual trees and woodlands within a development site should also be considered in terms of their overall connectivity between woodlands affected by the development. Perhaps with the creation of some larger woodland blocks and hedgerow/hedgerow trees between the existing woodland blocks on site, to link them and ensure maximum gains to increase habitat connectivity, to make woodlands more resilient and to benefit biodiversity across the whole site, not solely in specific isolated areas or just to be used as screening.

With the Government aspiration to increase tree and canopy cover to 16.5% of land area in England by 2050, The Forestry Commission is seeking to ensure that tree planting is a consideration in every development not just as compensation for loss. However, there are a number of issues that need to be considered when proposing significant planting schemes:

- Biosecurity of all planting stock needs to be considered to avoid introducing pests and diseases.
- Woodlands need to be climate, pest and disease resilient.
- Maximise the ecosystem services benefits of all new woodland wherever possible (flood reduction)
- Planting contributes to a 'resilient treescape' by maximising connectivity across the landscape.
- Plans are in place to ensure long term management and maintenance of woodland.

We hope these comments have been useful to you. If you require any further information, please do not hesitate to contact me.

Best wishes

Sandra

*Sandra Squire*

Local Partnership Advisor
East & East Midlands

Tel: [redacted]

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Response of **Great Thurlow Parish Council** to consultation to Kingsway Solar Ltd.

Parish Clerk January 12th 2025

Great Thurlow Parish Council objects to the Solar Farm and Battery Storage proposed by Downing Renewable Developments. The council feel that there would be considerable adverse impacts on the rural and agricultural nature of the area and surrounding rural communities and villages. Great Thurlow Parish is in close proximity and shares an agricultural community similar to West Wratting

The Council feels that there is no good reason to convert good agricultural land useful for food production, to such a large-scale energy project.

West Wratting and surrounding community is an area of beautiful countryside adjacent to our parish and this project would remove that quality. The Council has concerns about the proximity of the infrastructure to homes and village amenities. The scale of the project would make it visible from all surrounding areas.

The Council are concerned about above land infrastructures, fencing, cables and potentially pylons which may carry power from site. All footpaths are regularly used in the area and need to be kept in a condition that this can continue safely.

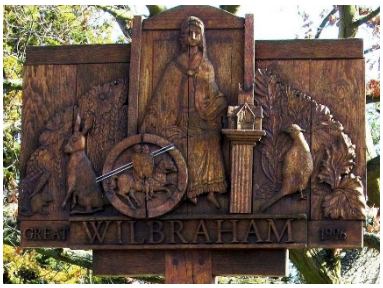
In addition, it is known that some of the land is prone to flooding and concern was raised that this could potentially be worsened due to construction works in this project.

The Council are aware of some local businesses in the area, these could potentially be affected by the development. There is a woodland cemetery close to the project and the council would like to be assured that the nature and peaceful ness of this would remain unchanged.

The Council would like to see a detailed proposal for the preservation and maintenance of the local environment and wildlife habitat, showing consideration for breeding and nesting times during proposed building works.

The Council express concern for the storage of the battery systems and particularly for the storage of lithium batteries near habitation and community buildings.

The roads around West Wratting are not suitable for heavy construction traffic. The Council would welcome a traffic plan showing consideration for restrictions on times and numbers of heavy vehicles, taking into account the impact on the village community. It would also like to see confirmation that all roads would be repaired and reinstated at no expense to the local area or district council.




**GREAT WILBRAHAM PARISH COUNCIL**
**Chairman: Dr Hilary Burton. Clerk: Mrs Sam Chambers-Turner**
[redacted]
**CB25 9AD**
[redacted]
**Email: clerk@greatwilbahamparishcouncil.gov.uk**

**12 January 2024**

**The Planning Inspectorate**

**Dear Sirs**

**Kingsway Solar Farm: Scoping Document**

Please see the following comments from Great Wilbraham Parish Council on the Kingsway Solar Farm Scoping Document.

Yours sincerely

[redacted]

**Hilary Burton**
**Chairman**
**Great Wilbraham Parish Council**

To The Planning Inspectorate

**Response to Kingsway from Great Wilbraham Parish Council**

Thank you for giving us the opportunity to comment on the Environmental Impact Scoping Report (EIA). We note first, two general points:

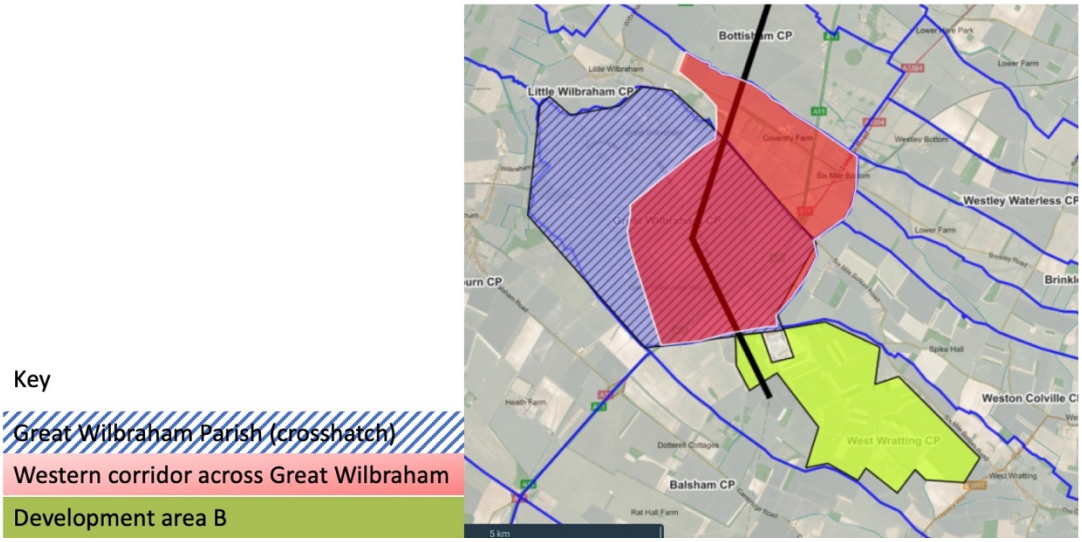
1. As a Parish Council for one of the parishes affected by this development, we request that we should be involved in any assessment of potential harm during construction, running and decommissioning phases and the likely effectiveness of any proposed mitigations.

2. We were notified about this consultation on 17th December, with a response due date of 14th January. We should like it to be noted by HM Planning Inspectorate, that (as they advised developers in their meeting on 13th November) it is unreasonable to expect responders to make a fully informed response over the holiday period. Parish Councils are small organisations of volunteers who operate through public meetings, which tend to be suspended over the holiday period. We have therefore constructed this response to set out those issues that are important to our parish on the basis of the development plans we have seen and the limited time that we have had available.

Great Wilbraham Parish i**s directly affected** by the proposed solar farm (See Figure A):

- The southern border of Great Wilbraham Parish is contiguous with the northern boundary of Development Area B.
- The western connection corridor goes directly across the southern half of the parish.

**Figure A showing Great Wilbraham parish (blue crosshatch), Western Connection Corridor (red) and Development area B (green).**



Aspects that we would expect to be considered within scope include:

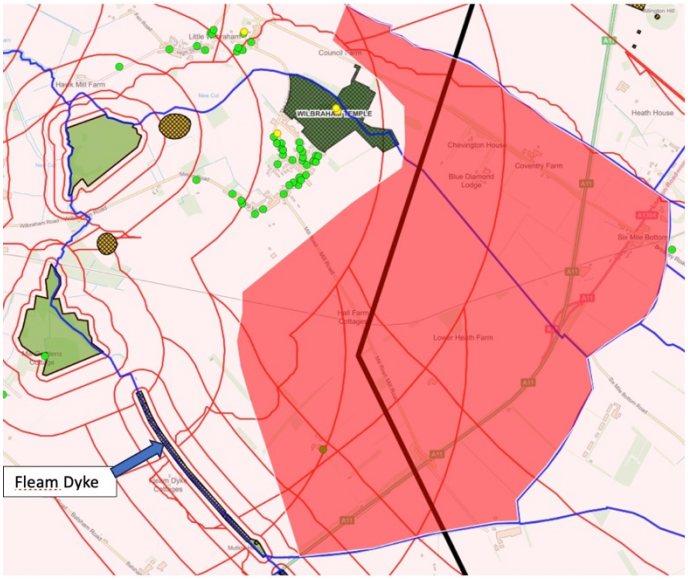
1. (See Figure B) The possible effect on the landscape setting of the village itself, which has around 600 residents and 300 houses and is situated on the north-eastern edge of the Western Connection Corridor. In particular, the detriment to residents of the loss of the current surrounding landscape described as an open agricultural landscape interspersed with gappy hedgerows, distinctive shelterbelts including coniferous and broad-leaf species and occasional hedgerow trees. It should be noted that there is already a line of pylons across the land – there would be a high visual impact if a second line was placed close to this one or ran across the same landscape, particularly if the two lines and towers were awkwardly juxtaposed.

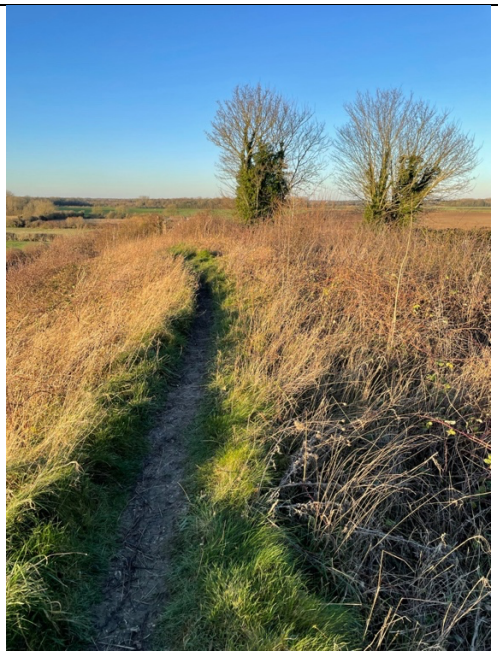
**Figure B showing Western Connection Corridor cutting across very close to the south-eastern edge of Great Wilbraham village. (Note current pylon line already in existence (thick red/black line).**

2. (See Figure C) The possible detrimental effect that a damaged agricultural landscape would have on the situation and surroundings of the current listed buildings (shown with green dots for Grade II and yellow dots for Grade II*), including registered park and gardens of Wilbraham Temple (green cross-hatched) and scheduled monuments (brown), most notably Fleam Dyke (labelled). It should be noted that the current views from Fleam Dyke are particularly open and expansive (See Figure D).

3. (See Figure C). The possible detrimental effect on SSSIs, including, Great Wilbraham Common (light green) and also Fulbourn Nature Reserve (light green) – the map below also shows SSSI impact risk zones.

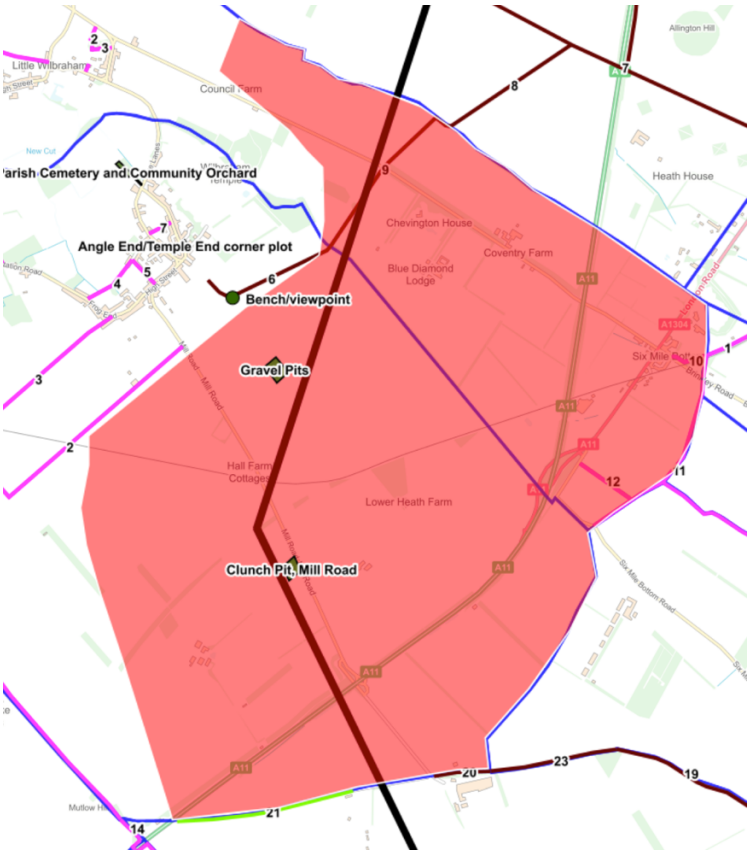
**Figure C Kingsway Western Corridor with listed buildings, scheduled monuments and SSSI with SSSI impact risk zones**




| **Figure D Views along Fleam Dyke**<br><br>**Looking south-east towards A11** | **Looking back towards Fulbourn and Great WIlbraham** |
|---|---|
| |  |

4. (See Figure E). The possible detrimental effect on the views from the Public Rights of Way (shown with numbered lines), particularly numbers 1,2,3,6,8 and 9 which include Street Way and Fleam Dyke.
5. (See Figure E). Damage to the view from our Parish viewpoint at the site of the GW Parish Jubilee Bench and from GW parish land, notably the– Gravel Pits (an old area on Butt Lane used for archery practice in mediaeval times), and the Clunch Pit, a GW parish wood. We would particularly like to request that the impact on views from the Parish Bench and Gravel Pit should be assessed.

**Figure E. Portion of Kingsway proposed West Connection Corridor bounded by the Parish Boundaries of Great Wilbraham and Little Wilbraham/Six Mile Bottom (red zone). Also showing public rights of way (numbered lines), Parish lands (named green areas), Parish bench and viewpoint (green circle) and existing line of pylons (thick red/black line).**




6. See Figure F. Damage to the chalk streams of a) Little Wilbraham River, which rises from springs in Wilbraham Temple and flows through Great and Little Wilbraham and b) the Great Wilbraham River, which rises from springs on Fulbourn Nature Reserve and flows to Little Wilbraham. The springs are fed from aquifers under the boulder clay where solar panels in Areas A, B and C are to be sited. *Please note that we recommend that the Wilbraham River Protection Society should be approached for assessment of potential damage.* *https://www.thewrps.org*

**Figure F. Map showing Little Wilbraham River (top right) arising from springs in Wilbraham Temple and Great Wilbraham River (bottom) arising from springs south of Fulbourn Nature Reserve. (Source Wilbraham River Protection Society https://www.thewrps.org/maps)**

7. The likely damage to roads and tracks caused by extra traffic, particularly HGVs during construction, and decommissioning of the development. Likely effects should be assessed for all the roads through Great Wilbraham and particularly Butt Lane/Street Way (PROW), Mill Road (going south from the High Street towards the A11), junction of Mill Road with High Street, entrance and exit for Great Wilbraham onto A11 and the bridge over A11.

8. The effect of glint and glare from the solar panels particularly for vehicles travelling south up Mill Road.

The Planning Inspectorate
Environmental Services Operations Group 3
Temple Quay House
2 The Square Bristol, BS1 6PN
KingswaySolar@planninginspectorate.gov.uk

CEMHD - Land Use Planning,
NSIP Consultations,
Building 1.2, Redgrave Court
Merton Road, Bootle,
Merseyside L20 7HS.
NSIP.applications@hse.gov.uk

Date: 8/01/2025

Dear Sir/Madam,

**PROPOSED KINGSWAY SOLAR FARM PROJECT**
**PROPOSAL BY KINGSWAY SOLAR FARM LIMITED**
**INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (AS AMENDED) REGULATIONS 10 AND 11**

Thank you for your email on 17/12/2024 regarding the information to be provided in an environmental statement relating to the above project. HSE does not comment on EIA Scoping Reports, but the following information is likely to be useful to the applicant.

**HSE's land use planning advice:**

**Will the proposed development fall within any of HSE's consultation distances?**

According to HSE's records, the proposed DCO application boundary for this Nationally Significant Infrastructure Project is within the consultation zones of several major accident hazard pipelines ['MAHP']. This is based on the Kingsway Solar Park scheme boundaries (Area A, B, C, all connection corridor) in **Figure 1.1 'Scheme locations and boundaries'** in the **EIA Scoping Report Main Report December 2024** [downloaded from: EN010165-000007-Kingsway - EIA Scoping Report - Main Report.pdf].

Due to the scale and complexity of the site boundary against the number of consultation zones in this area and the resulting difficulties in cross-referencing against each other, HSE requested GIS files of the DCO boundary. However, this was not received, so HSE cannot give an accurate list of the pipelines for this consultation. At the next consultation, if the applicant can provide a GIS version of the DCO boundary then HSE can identify the specific pipelines. At this time, HSE can only indicate the likely operators with pipelines in this general area:

- National Grid
- Cadent Gas

The Applicant should contact the above operators to obtain a list of pipelines in this area, and to inform an assessment of whether the proposed development is vulnerable to a possible major accident. There are three particular reasons for this:

i. The pipeline operator may have a legal interest in developments in the vicinity of the pipeline. This may restrict developments within a certain proximity of the pipeline.
ii. The standards to which the pipeline is designed and operated may restrict major traffic routes within a certain proximity of the pipeline. Consequently, there may be a need for the operator to modify the pipeline or its operation, if the development proceeds.
iii. To establish the necessary measures required to alter/upgrade the pipeline to appropriate standards.

HSE's Land Use Planning advice is dependent on the location of areas where people may be present in relation to HSE's consultation zones [HSE: Land use planning - HSE's land use planning methodology]. Based on the information in the **EIA Scoping Report Main Report December 2024** there is not yet enough detail for HSE to give advice. Of particular interest is there is provision for an operations building.

Please note that the advice is based on HSE's existing policy for providing land-use planning advice and the information which has been provided. HSE's advice in response to a subsequent planning application may differ should HSE's policy or the scope of the development change by the time the Development Consent Order application is submitted.

**Would Hazardous Substance Consent be needed?**

Hazard classification is relevant to the potential for accidents. Hazardous substances planning consent is required to store or use any of the Categories of Substances or Named Hazardous Substances set out in Schedule 1 of The Planning (Hazardous Substances) Regulations 2015 as amended, if those hazardous substances will be present on, over or under the land at or above the controlled quantities. There is an "addition rule" in Part 4 of Schedule 1 for below-threshold substances.

Based on the **EIA Scoping Report Main Report December 2024**, it is not clear whether the applicant has considered the hazard classification of any chemicals that are proposed to be present at the development. This may be because there are no in-scope hazardous substances. If hazardous substances planning consent is required, please consult the relevant Hazardous Substance Authority (usually the Local Planning Authority) on the application.

**Consideration of Risk Assessments**

Regulation 5(4) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 requires the assessment of significant effects to include, where relevant, the expected significant effects arising from the proposed development's vulnerability to major accidents. HSE's role in NSIPs is summarised in Advice Note 11 "working with public bodies in the infrastructure planning process" Annex G on the Planning Inspectorate's website: Nationally Significant Infrastructure Projects - Advice Note Eleven, Annex G: The Health and Safety Executive - GOV.UK (www.gov.uk). This document includes consideration of risk assessments under the heading "Risk assessments".

In the **EIA Scoping Report Main Report December 2024** it was not clear if there was consideration of risk assessments arising from the development's vulnerability to major accidents (e.g. from the above identified sites and/or pipelines). We would advise this is considered further in line with Advice Note 11 Annex G taking account of the following: *"it may be beneficial for applicants to undertake a risk assessment as early as possible to satisfy themselves that their design and operation will meet the requirements of relevant health and safety legislation as design of the Proposed Development progresses."*.

**Explosives sites**

Explosives Inspectorates response is no comment to make as there is no HSE Licensed explosive sites in the vicinity of the proposed development.

At this time, please send any further communication on this project directly to the HSE's designated e-mail account for NSIP applications at nsip.applications@hse.gov.uk. We are currently unable to accept hard copies, as our offices have limited access.

Yours sincerely

CEMHD NSIP Consultation Team

Historic England

Ms Deb Glassop
Kingsway Solar Farm
Planning Inspectorate
Environmental Services Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN

Direct Dial: [redacted]

Our ref: PL00797700

(by email to KingswaySolar@planninginspectorate.gov.uk)

14 January 2025

Dear Ms Glassop

**EN010165 - Kingsway Solar Farm - EIA Scoping Consultation**

Thank you for consulting with Historic England on the EIA Scoping for Kingsway Solar Farm. We have reviewed Kingsway Solar Farm EIA Scoping Report and offer the following advice on this EIA Scoping response

**Historic England Advice**

The EIA Scoping Report has identified that the proposed development site lies in a landscape which contains a large number of designated heritage assets including scheduled monuments, listed buildings, conservation areas and registered park and gardens.

Historic England is broadly in agreement with the proposed scope and methodology for the assessment of the cultural heritage impacts of the proposed development that are set out in the EIA Scoping Report. However, we offer the following specific comments on the Report.

The Scoping Report refers to 'Developable Areas A, B and C' to describe the proposed areas of solar panels. Although this terminology is used in our response below it should not be taken as an indication that Historic England supports development in all of the proposed areas at this stage.

**Chapter 2 –Description of the Scheme**

**2.7.1** – This paragraph outlines the elements needed for the proposed development. We note that a number of the elements would require ground disturbance and could have direct adverse impacts on below-ground archaeology.

**2.7.3** - sets out the design parameters of the components of the proposed scheme. Specific details of depth of below-ground elements or the heights of above-ground structures are listed in **Table 2-1**. Whilst we understand that some parameters may change as the proposed scheme is developed, we welcome the inclusion of this useful summary at this stage.



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**2.7.8** – This paragraph states that the metal mounting frames will be pile driven into the ground to a maximum depth of 1.5m. We recommend that the Historic England document '*Piling and Archaeology*' (2019) is referred to and the impact that the piles may have on archaeological remains and deposits is considered: https://historicengland.org.uk/images-books/publications/piling-and-archaeology/.

We note, and welcome, the inclusion of an option to mount panel frames on concrete ballast in areas of archaeological sensitivity to avoid physical impact on buried archaeological remains.

**2.7.29** – states that connections will be required between the proposed Developable Areas and land parcels. It is not clear at present whether these connections will comprise overhead lines, underground cables or a combination of both. The different cabling options will have different implications for the historic environment – overhead cables will primarily have setting implications whilst buried cabling would have potential to have a physical impact on archaeological remains.

**2.8.3 - 2.8.5** – states that the preferred option for the export cables to the proposed Burwell South sub-station is via overhead lines. If overhead lines are used it is indicated that these would use steel lattice pylons up to 50m in height. We have concerns that overhead lines could potentially have significant setting implications for designated heritage assets.

It is stated that, if underground cabling is used, horizontal directional-drilling may be required to install cables in sensitive parts of the proposed scheme area. We recommend that the potential impacts of issues such as bentonite slurry outbreak on archaeological remains is considered. For example, bentonite slurry outbreak could result in physical damage to archaeological remains or it could result in a change in the conditions of an archaeological site that may result in the degradation of fragile remains.

**2.8.7** – We welcome that the choice of cabling type and alignment within the proposed Grid Connection Corridors A and B will be further assessed and presented in the ES.

**2.9.1** – sets out the types of construction activities that may be required for the proposed development. In addition to the potential impacts from the installation of permanent infrastructure, a number of the proposed activities relating to temporary construction infrastructure (e.g. compounds, access tracks etc) have potential to have permanent physical impact on archaeological remains.

## Chapter 4 – Approach to the EIA

**4.2.7** – We welcome that Historic England is included in the list of statutory consultees for the EIA process.



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**4.8.5** – **Table 4-1** sets out the anticipated embedded (primary) environmental mitigation measures. For cultural heritage its proposed that the scheme would be set back 50m from scheduled monuments. We consider that this should be seen as an absolute minimum and that buffers around scheduled monuments should be assess on a case by-case basis as part of the Cultural Heritage Assessment and LVIA.

## Chapter 6.2 Landscape and Visual Amenity

As set out in 'Historic Environment Good Practice Advice in Planning: 3. The Setting of Heritage Assets' (Second Edition 2017) changes to the settings of heritage assets can cause harm to their significance.

There is a high potential that the proposed development would be visible in views from designated heritage assets located within its vicinity. The inclusion of modern infrastructure in the form of solar panels into the existing rural landscape of the surrounding designated heritage assets could adversely affect the manner in which they are appreciated and result in harm to their significance.

It is important to note that it is not only views from designated heritage assets that form part of their settings, but potentially also wider landscape views that would incorporate both the heritage asset and the proposed development in the same vista.

Potential may also exist for the proposed development to adversely affect the settings of non-designated heritage assets in Cultural Heritage study area.

It is important that the LVIA is undertaken in tandem with the Cultural Heritage and Archaeology Assessment and that viewpoints are selected to achieve a clear understanding of the potential visual impacts.

Historic England welcomes the opportunity to discuss potential viewpoints further.

## Chapter 6.3 – Cultural Heritage

**6.3.14** – sets out eight Scoping Questions on the Cultural Heritage Sub-Chapter. Historic England considers that it is beneficial to answer these in the following table at the start of our response to this section supported by additional detailed comments where required.

| Chapter 6.3 (Cultural Heritage) Scoping Question | Historic England comments |
|---|---|
| Do you agree with the proposed consultees to be engaged with on this topic? | Yes, but see comments on 6.3.1 below |
| Do you agree with the proposed study area? | Yes - as proposed in 6.3.2 |
| Do you agree that the data sources listed to inform the EIA baseline characterisation are appropriate? | See comment on 6.3.3 below |



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| | |
|---|---|
| Do you agree that the surveys proposed to inform the EIA baseline characterisation are appropriate? | Yes, but see comments on 6.3.4 below |
| Are any receptors/assets/resources not identified that you would like to see in the EIA? | There are no specific receptors / assets / resources that we wish to see added but see comments on 6.3.5 and 6.3.6 below |
| Do you agree with the proposed additional (secondary and tertiary) mitigation measures and is this mitigation appropriate? | No – see comments on 6.3.7 below |
| Do you agree with the receptors/matters that are proposed to be scoped out of further assessment? | No -see comments on 6.3.9 below |
| Do you agree with the proposed factor-specific assessment approach? | Yes |

**6.3.1** – Historic England acknowledge that it is proposed that we will be consulted in relation to designated heritage assets throughout the EIA. Whilst we agree that we would principally defer to the advice of local authority conservation teams in relation to potential impacts on Grade II Listed buildings, Historic England will consider and provide comments on potential impacts on Conservation Areas.

**6.3.3** – We recommend the use of the Regional Archaeological Research Framework to inform the archaeological assessment. The current version of the Research Framework was released in 2021 and can be found at https://researchframeworks.org/eoe/.

We recommend that the potential value of BGS borehole data (available through the GeoIndex resource: https://www.bgs.ac.uk/map-viewers/geoindex-onshore/) is considered for the baseline assessments. The borehole data can contribute to the development of a preliminary deposit model that helps to characterise the deposits present, their archaeological potential and the likely impacts of the proposed scheme.

**6.3.4** – Historic England is in broad agreement with the range of surveys proposed to inform the EIA baseline characterisation.

It is stated that LiDAR will be used to understand the baseline conditions. The resolution of the gridded data is important because it limits the size of the features that can be seen and recorded; 2m resolution data are generally inadequate for recording many archaeological features; 1m resolution is the basic minimum but where greater detail is required higher resolution data are preferable. We therefore recommend that the Historic England document *'Using Airborne Lidar In Archaeological Survey*' (2018) is referred to: https://historicengland.org.uk/images-books/publications/using-airborne-lidar-in-archaeological-survey/.



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It is not clear whether geophysical survey is proposed on the Inter Array and Grid Cable Connection Corridors as well as the proposed Developable Areas. We would recommend that, where appropriate, geophysical survey is used alongside desk-based assessment and aerial photography/lidar assessment to inform the micrositing of the cable routes.

**6.3.5** – sets out the baseline archaeological information for the Developable Areas A- C and the Inter Array Connection Corridors. Historic England is in broad agreement with the designated heritage assets identified. However, we wish to raise the following concerns about specific heritage assets.

The scheduled monument 'Bowl barrow 1080m north east of Worsted Lodge Farm, part of a dispersed round barrow cemetery in Charterhouse Plantation' (LEN 1019989) is identified as lying on the northern boundary of Developable Area A. The scheduled monument 'Four bowl barrows 920m and 950m south east of Heath Farm, part of a dispersed round barrow cemetery in Charterhouse Plantation' (LEN 1017326) is located 240m to its northwest within the 2km study area. As is acknowledged in Section 6.3.5 and the monument names these two scheduled monuments form part of the same barrow cemetery.

Historic England has particular concerns about the impact of the proposed development on the setting of these barrows. We consider that it is important that these scheduled monuments are assessed as a group along with any associated non-designated ring ditch or barrow remains that form part of the same cemetery.

The eastern end of the 'Fleam Dyke' scheduled monument (LEN 1006931) lies at the southern end of Developable Area B and partly within the Inter Array Corridor. The Fleam Dyke lies within a largely open arable landscape that enables its presence and scale in the landscape to be appreciated.

Historic England has particular concerns about the impact of the proposed development on the setting of this scheduled monument. It is possible that the Fleam Dyke continues further east beyond the scheduled monument but that it does not survive as a substantial earthwork bank and ditch. The route of the possible continuation is uncertain, but it is possible that it follows the southern boundary of Developable Area B. The possible continuation should be given adequate consideration during the assessment of impacts on the Fleam Dyke, both in terms of setting and physical impacts.

Developable Area A lies approximately 270m northeast of the 'Worstead Street (Via Devana) near Cambridge' scheduled monument (LEN 1003263). The landscape context of the Roman Road makes an important contribution to its setting and significance, both in terms of how the monument is understood and experienced. Historic England is concerned that the introduction of solar panels in close proximity to the Roman road would reduce its legibility in the landscape and result in harm to its significance.



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The Worstead Street Roman Road is one of a series of post-Roman linear monuments in Cambridgeshire running parallel to each other across the landscape and including Fleam Dyke and Devils Ditch. These cross the chalk plain from the wetlands in the north to the higher land in the south. These historic features in the landscape provide important information about the organisation of the landscape, as well as the rhythm of movement and transport in the early medieval period. We consider it important that the shared landscape context of these monuments, and the setting impacts upon them are considered together.

The Grade II* Listed 'West Wratting Park House' (LEN 1127902) and its assocaited Grade II Listed buildings are located in the southern part of proposed Developable Area C. The house faces its former parkland to the southeast. The former parkland is partly under arable cultivation but retains some of its planting belts and remains legible as a former park. The former park is an important part of the setting of the GII* Listed house and a non-designated heritage asset. Historic England has serious concerns about solar farm development within the former park and consider that it would have potential to result in a high level of harm to the significance of West Wratting Park House.

We note that proposed Developable Area C lies immediately adjacent to the West Wratting Conservation Area and in close proximity to the Brinkley Conservation Area. We have concerns that the proposed development could result in harm to the significance of these Conservation Areas through development within its immediate setting.

A large number of listed buildings and the 'Moat House moated site' scheduled monument (LEN 1019174) lie in close proximity to the proposed Developable Area C. Historic England has concerns about the impact of the proposed development on the settings of these designated heritage assets.

**6.3.6** – sets out the baseline conditions for the grid connection corridors. As has already been noted, the method of grid connection, whether overhead lines, underground cables or a combination of both has yet to be determined. The historic environment implications of the different grid connection options are very different.

Historic England considers that a thorough assessment of the historic environment implications of the possible grid connection options needs to be undertaken. It is important that an understanding of the potential harm that could arise to designated heritage assets within, and potentially beyond, the proposed connection corridors is used to inform the choice of cable connection method.

Historic England has particular concerns about how the proposed grid connections would cross the line of the 'Fleam Dyke' and 'Devil's Ditch, Reach to Woodditton' (LEN 1003262) scheduled monuments and the level of harm that could potentially arise to their significance through setting or physical impacts.



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**6.3.7** – discusses the additional (secondary and tertiary) mitigation measures. We welcome that proposed mitigation measures will be agreed with Historic England.

Whilst we agree that planting and landscaping have potential to act as appropriate mitigation measures for the areas of solar panels, these should be used in conjunction with embedded design mitigation (layout). We also wish to state that planting and landscaping would be unlikely to provide suitable mitigation measures for overhead lines if these are used for the grid connections.

**6.3.10** – sets out the receptors/matters to be scoped out of further assessment. We do not agree that findspots recorded on the Cambridgeshire Historic Environment Record should necessarily be wholly screened out at this stage. Some archaeological site types (e.g. Early Anglo-Saxon cemeteries) are not conducive to detection through aerial photography or geophysical survey and the only indication of there presence may be through artefacts recovered from the ploughsoil (e.g through metal detecting). Consequently we consider that the potential significance of previously recorded findspots is scoped-in and filtered appropriately for assessment.

**Chapter 6.4 Land, Soils and Groundwater**

Information presented in Chapter 6.4 is of value to aid the understanding and assessment of the archaeological potential considered in Chapter 6.3. This information, such as any geological information obtained from BGS core data, will aid the assessment of the potential for archaeology to be present in areas of the proposed development and its potential state of preservation. The way that geological data is interpreted for archaeological purposes is different compared to assessments for engineering purposes. We therefore recommend that a geoarchaeologist is given access to the information presented in this chapter and allowed to liaise with geotechnical specialists if ground investigation works will be carried out. This would ensure that locations for cores can be targeted so that they will be beneficial for both disciplines, and to ensure that the archaeological relevance is not missed.

Also with relevance to this chapter, it should be noted that changes to groundwater levels or compaction of archaeological deposits may result in physical damage or changes to the preservation of an archaeological site. This could result in the degradation and/or loss of vulnerable remains, particularly organic remains that may be preserved through waterlogging. We recommend that the Historic England document '*Preserving Archaeological Remains*' (2016) is referred to, and the impacts that this issue may have on archaeological remains are considered: https://historicengland.org.uk/images-books/publications/preserving-archaeological-remains/.

**Next Steps**

Historic England considers that the proposed development has potential to have both direct and indirect impacts on designated heritage assets within the proposed development area and in the surrounding landscape through changes to their settings.



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We support the inclusion of a Cultural Heritage and Archaeology chapter within the EIA. Subject to the advice given in this letter, we are in broad agreement with the proposed scope and methodology of the Cultural Heritage Assessment.

Historic England would welcome the opportunity to engage in further detailed discussions regarding the proposed development.

If you have any questions or we can be of further assistance at this stage, please do not hesitate to contact us.

Yours sincerely

**Dr James Albone MCIfA**
Inspector of Ancient Monuments (Cambridgeshire & Norfolk)
Tel: [redacted]
Mob: [redacted]
Email: [redacted]



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## Patten, Jack

**From:** Clerk <clerk@horseheath-pc.gov.uk>
**Sent:** 14 January 2025 15:17
**To:** Kingsway Solar Farm
**Subject:** EN010165

**Follow Up Flag:** Follow up
**Flag Status:** Flagged

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Hello,

Horseheath Parish Council strongly supports the comments made by the following Parish Councils - Balsham, West Wratting, Weston Colville, Wilbrahams, Burwell, Reach, and Swaffham Bulbeck. Horseheath Parish Council expresses concern about transport, if HGV transport would be travelling from the A1307 to the villages. The roads are narrow, and some are single track, unsuitable for large vehicles.

Kind Regards

Jess Ashbridge
Clerk to Horseheath Parish Council
[redacted]

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## Patten, Jack

**From:** Clerk <clerk@horseheath-pc.gov.uk>
**Sent:** 14 January 2025 20:52
**To:** Kingsway Solar Farm
**Subject:** EN010165

**Follow Up Flag:** Follow up
**Flag Status:** Flagged

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Horseheath Parish Council has carefully considered the EIA for the Kingway Solar Proposal. Our comments are:

- Parish Councils should be statutory consultees for projects such as this
- We have read and fully endorse the comments of both Weston Colville Parish Council and West Wratting Parish Council
- In general we believe the inclusion of Area C is detrimental, in terms of landscape and land use, transport, ecology, heritage assets, resources and safety.
- A major concern is the suggested use of Six Mile Bottom road as a route for construction traffic for area C. This road, leading in to West Wratting, is entirely unsuitable for HGVs. The size of the road makes it difficult for two cars to pass each other; there are multiple potholes and the grass verge to road interface is generally in a poor state of repair. It is entirely unsuitable for the proposed 70-100 HGVs during construction.

Kind Regards

Jess Ashbridge
Clerk to Horseheath Parish Council
[redacted]

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# LINTON PARISH COUNCIL

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Telephone: 01223 891001
Chairman: Ms. Kate Kell
www.lintoncambridgeshire-pc.gov.uk


LINTON
PARISH COUNCIL

Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

13th January 2025

**The Planning Inspectorate Ref: EN010165**

**RE: Linton Parish Council comments on information to be provided in the Environmental Statement (ES) and scoping process by Kingsway Solar Farm Limited (the Applicant) for an Order granting Development Consent for Kingsway Solar Farm (the Proposed Development)**

Dear Sir/Madam,

Please find below the comments from Linton Parish Council (LPC) on information should be provided in the ES.

1) Linton is not mentioned in the document despite neighbouring villages being cited.

2) LPC have concerns in relation to negative effects to the water course. There is no consideration of the effects on water currently, specifically in relation to the potential negative effect on tributaries of the protected Chalk Stream and the increased risk of surface water flooding caused by the installation of impermeable infrastructure.

   LPC reference the comments submitted by the Lead Local Flood Authority (LLFA) on planning application reference S/2553/16/CONDO (copies included with this letter and also available of the LPA Planning Portal https://applications.greatercambridgeplanning.org/online-applications/applicationDetails.do?activeTab=documents&keyVal=QPHNUCDXIIU00). These comments highlight the impact of surface water flooding and the risk to the area.

3) LPC have concerns in relation to the negative impact on the environment and biodiversity. There is no consideration of the effects on Barn Owls, raptors and small mammals currently, along with the negative implications and the environmental impact on the wildlife corridor and wider habitat.

Yours faithfully,

[redacted]

Mrs Jenny Seaward
Clerk for Linton Parish Council

ENC.

Cambridgeshire County Council

**My ref:** FR/21-000101
**Your ref:** S/2553/16/CONDO
**Date:** 09/09/2021
**Doc no:** 201106686
**Officer:** Hilary Ellis
**E Mail:** [redacted]

**Steve Cox: Executive Director**
**Place and Economy**
**Environment and Commercial**

Alconbury Weald Civic Hub
Emery Crescent
Enterprise Campus
Alconbury Weald
PE28 4YE

Karen Pell-Coggins
Greater Cambridge Shared Planning
South Cambridge Hall
Cambourne Business Park
CB23 6EA

**PROPOSAL: Submission of details required by condition 11 (Surface water drainage) of outline planning permission S/2553/16/OL**

**Land Off Horseheath Road Linton Cambridgeshire**

**Comments from Lead Local Flood Authority (LLFA)**

Dear Madam,

Further to our letter dated 27 July 2021 and following extensive discussions with the developer, SCDC, Linton Parish Council, local residents and the local MP, we are writing to set out our position with respect to the above application. Our response is laid out in three parts:

1. **Developments since our letter dated 27 July 2021**
2. **Concerns raised by the Parish Council / local residents**
3. **Additional information submitted by Croudace on 3 September 2021**

**Developments since our letter dated 27 July 2021**

In our letter in July we set out three points in relation to our request for a pause on the application.

1. **Photo and video evidence to demonstrate development site may have contributed to the flooding – including overwhelming of the basin and removal of water via a pump into the public sewer network**
   On 20th July it is thought that silt (including cement dust) and other debris was mobilised in the water flowing through the site towards and into the infiltration basin which then impeded its ability to adequately allow water to soakaway. Following site visits and meetings with both the developer and SCDC, it has been agreed that improved measures are required throughout the construction period to reduce the risk of silts and other debris being mobilised in the event of another severe rainfall event. These measures are outlined in the updated Construction Management Plan and include:

- Construction of a temporary drainage channel along the edge of the temporary site entrance
- Construction of a temporary trench to create a soakaway at the end of the drainage channel
- Materials moved away from water channels to mitigate risk of silt and sand being washed into the basin
- Clearance of on-site gullies from site debris on ongoing monitoring throughout construction
- Emergency sand bags filled and stored on site
- Planned installation of French drains around site compound
- Concrete blocks installed along road boundary of infiltration basin to catch any residual silts the may be flowing in surface water

Anglian Water have investigated the impact of any water being pumped into their system and have concluded that no further action is to be taken.

2. **Inadequate soakage rates of the basin during the flood event**
   As outline above, it is understood (and confirmed by local residents and the developer) that a significant amount of debris including silts, sands and cement dust was picked up in flood water and ended up in the basin. In effect, this coated the base of the basin which in turn impeded its ability to drain properly. Once adequate construction management practices are implemented and the basin has been fully and properly constructed, it should function as designed and contain all surface water up to the design event (1 in 100 year plus 40% climate change). An additional 300 mm freeboard has been allowed for around the final basin to contain additional flows in the event of a more extreme event.

3. **Concerns over structural integrity of bund around basin**
   The developer has confirmed that a concrete plug will be constructed through the centre of the bund to mitigate against the risk of bund collapse. In order to ensure the continued integrity of the bund, activities have been included within their maintenance plan which states that on a monthly basis there will be an inspection of banksides, structures, pipework for evidence of physical damage and remedial actions will be undertaken 'as required' to repair damage. As outlined in our previous correspondence, we recommend a qualified structural engineer signs off these works.

We are content that our concerns with respect to the above three points have been adequately addressed. We do however recommend the LPA undertakes regular monitoring of the development throughout construction to ensure it is being constructed in accordance with any agreed plans.

Cambridgeshire County Council

**Concerns raised by Parish Council / local residents**

Since our 27 July letter, further concerns have been raised by residents/Parish Council including the following:

1. **Lack of Exceedance Route Plan**

As outlined in the adopted Flood and Water Supplementary Planning Document, a development should take account of flows that may exceed the design capacity of the drainage system. Section 5.1.0 and Table 5.3 of the SPD state that the central estimate of 20% climate change should be used for design purposes of the drainage scheme and sensitivity testing up to 40% climate change should be undertaken to ascertain whether there is any increased flood risk to third parties as a result of the development. This has been undertaken by the developer. In addition, further sensitivity testing has been undertaken assuming an increase in impermeable site area of 10% (over and above what has been approved) and a factor of safety of 10 for the infiltration basin. This factor of safety effectively models the infiltration rate as 10 times lower than what has been observed on site. This is to cater for potential silting up over time (typically a factor of safety of between 1.5 and 5 would be used for developments). The basin has been designed to cater for surface water on these assumptions and has provided an additional 300mm freeboard within the south west of the site to provide additional storage capacity. The Exceedance Flow Plan Sensitivity Check (FOS10) (March 2021, Rev A) maps the extent of flooding expected at two manholes (CP21 and CP22) and demonstrates this water would be directed towards the basin as a result of the land levels. Given the additional assumptions that have been added into the modelling (factor of safety, additional impermeable area and use of a bund) we would not require further exceedance flow routing to be provided.

2. **Water emanating from off site**

Through our site visits and discussions with the developer, it is clear that during the July flood event water flowed down the temporary site entrance and across the site (unimpeded as there was no formal drainage system in place). It should be noted that once the temporary site access has been removed there will not be a water entry point to the site at this location. Instead, water will continue to flow down Horseheath Road where it will be intercepted by the existing highway drainage network (as it would have done prior to this development commencing). It should be noted that Cambridgeshire County Council are currently investigating the potential to enhance the highway drainage on Horseheath Road.

3. **Ongoing Management**

The Surface Water Drainage Statement contains a management and maintenance schedule including the required activities for each drainage feature that is to be included within the site. This is acceptable to the LLFA.

4. **Damage to the Site**

We have discussed the impacts of the flow of building materials into the basin and the impact this will have on the drainage capability of the site with Croudace. They have confirmed that any material will be cleared out of the basin (without the use of heavy machinery within the basin itself) and the ground will be rotavated to remedy the compaction that has occurred and to allow vegetation to be planted. This is acceptable to the LLFA.

4. **Accounting for a lined basin within the calculations**
   The submitted calculations do take account of this as they show infiltration through the sides of the basin to be zero.

**Additional information submitted by Croudace on 3 September 2021**

Following concerns raised by residents of Linton with regards to the drainage system and in particular the performance of the system following a rainfall event that occurred on 22 August 2021 I raised several specific questions to Croudace. They provided the LLFA with calculations to demonstrate how they would have expected the system to perform in the rainfall event versus how it actually performed. On this basis the LLFA is satisfied that the water drained away sufficiently quickly to meet with design standards. We have however queried the assertion by Croudace that the water level was estimated as 50.25 m AOD as this does not accord with the submitted drainage plans which show the base of the infiltration basin to be 51.50 mAOD. We await a response on this.

**Upon satisfactory clarification of the above point** and based on the following documents:

- Drainage Sensitivity Design Technical Note, Croudace Homes, 035-Linton-Rev 2. Dated: 8th April 2021.
- Exceedance Flow Plan Sensitivity Check (FOS 10), Croudace Homes, 035/356-A. Dated: 7th April 2021.
- Infiltration Basin and Sediment Forebay Detail, Croudace Homes, 035/070-E. Dated: 7th April 2021.
- Private Drainage Details, Croudace Homes, 035/041-A. Dated: 8th December 2020.
- Response to Drainage Objection, Croudace Homes. Dated: 8th April 2021.
- Surface Water Drainage Statement, Croudace Homes, DES/035/410(D). Dated: March 2021.

We could then **recommend the discharge of Condition 11** of planning permission S/2553/16/OL.

Surface water from the site will be managed through the use of an infiltration basin and permeable paving, which will enable surface water to infiltrate into the ground.

A bund will be provided along the south-western boundary of the site to ensure any basin overflows during events greater than the 1% Annual Exceedance Probability (AEP) storm event will be contained within the site.

The permeable paving and the infiltration basin will be maintained by a private management company in accordance with the Ciria SuDS Manual. Permeable paving is an effective method of slowing water as it flows between the induvial paving blocks and into the ground below. The use of this paving means that water won't simply flow down the road and straight into the basin,

instead it will be intercepted and controlled unlike the present situation. The completed infiltration basin will be vegetated and will allow water to soak into the underlying ground.

There is a sediment forebay proposed at the entrance to the basin to ensure that any silts and debris will be contained rather than coating the base of the basin

Yours faithfully,

*H Ellis*

**Hilary Ellis**

**Acting Flood Risk & Biodiversity Business Manager**
**Environment and Commercial**

**If you have any queries regarding this application, please contact the Officer named at the top of this letter (contact details are above).**

*Please note: We are reliant on the accuracy and completeness of the reports in undertaking our review and can take no responsibility for incorrect data or interpretation made by the authors.*

Cambridgeshire County Council

**My ref:** FR/21-000101 / FR/21-000085
**Your ref:** S/2553/16/CONDO / S/1963/15/CONDG
**Date:** 27/07/2021
**Doc no:** 201106503
**Officer:** **Jessica Prest**
**E Mail:** [redacted]

**Place and Economy**
**Environment and Commercial**

Box No. SH1315
Shire Hall
Castle Hill
Cambridge
CB3 0AP

Karen Pell-Coggins and Michael Sexton
Greater Cambridge Shared Planning
South Cambridge Hall
Cambourne Business Park
CB23 6EA

**Comments from Lead Local Flood Authority (LLFA)**

Dear Karen Pell-Coggins and Michael Sexton,

We write in respect of the following planning applications in Linton, Cambridgeshire, which are currently awaiting decision by the Local Planning Authority:

1. **S/2553/16/CONDO** - Land Off Horseheath Road Linton Cambridgeshire - Submission of details required by condition 11 (Surface water drainage) of outline planning permission S/2553/16/OL.
2. **S/1963/15/CONDG** - Land To North And South Of Bartlow Road And Immediate Linton Cambridgeshire - Submission of details required by condition 10 (Surface Water Drainage) of planning permission S/1963/15/OL

Whilst we previously wrote to the LPA on 1 June 2021 advising that we were satisfied with the proposed surface water drainage scheme, it is understood that the conditions have not yet been discharged. As you are aware, significant flooding occurred in Linton on 20 July 2021 and as the Lead Local Flood Authority (LLFA), we are currently conducting investigations under Section 19 of the Flood and Water Management Act 2010 into the cause of this flooding. To date, the LLFA has received 11 formal flood reports since the 20th July, including 9 reports of internal flooding to properties on 8 different streets in the village. We also received 3 further reports of flooding to external areas including gardens and outbuildings.

Both the LLFA and LPA have received information from the Parish Council and residents of Linton to suggest that the development site known as 'Land Off Horseheath Road' (S/2553/16/CONDO) may have contributed to this flooding. Flooding also occurred in the vicinity of the site known as 'Land To North And South Of Bartlow Road' (S/1963/15/CONDG) and whilst the development on that site has not yet commenced, we need to assess whether the proposed drainage system is suitable and adequate based on flooding that has occurred.

**We therefore request that any drainage related applications for both sites (S/2553/16/CONDO and S/1963/15/CONDG) are paused by the LPA until these investigations are complete. We anticipate that the initial stage of this investigation will take approximately two weeks.**

Cambridgeshire County Council

Further comments in relation to each site are provided below.

**S/2553/16/CONDO - Land Off Horseheath Road Linton Cambridgeshire**

- We have received photographic and video evidence to suggest that the development (which has already commenced despite not yet discharging the pre-commencement conditions) may have contributed to the flood events of the 20th July, the effects of which were most notable at Lonsdale, directly adjacent to the east of the development site. Flows are understood to have passed through and across the site, overwhelming the new basin in the south west of the site. We understand that water was manually removed from the basin by the on-site construction team using a tanker and pump. This water is thought to have been discharged into the public sewer network, however investigations into this are ongoing.
- Given that an infiltration basin has been proposed (the purpose of which is to allow water to soak away naturally into the ground), it is concerning that water had to be removed and disposed of manually. In line with the CIRIA SuDS Manual and best practice guidance (including the Cambridgeshire County Council Surface Water Drainage Guidance for Developers), the half drain time of an infiltration basin should not exceed 24 hours (1440 minutes). The reason for this is to allow capacity within the basin to accept any subsequent storms. The hydraulic calculations submitted with the application show an expected half drain time of 12 hours (712 minutes), however following on from 20 July 2021, it is believed it took far in excess of 24 hours for the water level to reduce. This is particularly concerning given that a pump was manually removing water at the same time. The LLFA therefore requires evidence to demonstrate the site and underlying geology are appropriate for infiltration. If not, an alternative strategy will need to be developed and submitted for approval.
- The developer proposes to include a bund around the basin to prevent any overtopping. Whilst the LLFA are not in a position to comment on the structural integrity of such a bund (this should instead be assessed by structural engineers), a breach analysis of the raised embankment would need to be undertaken, assuming bank-full conditions and this must demonstrate there will be no risk of inundation to any properties (new or existing). As per the previously submitted bund design, a concrete plug or similar should be constructed through the centre of the bund to mitigate against risk of bund collapse. An adequate maintenance plan should be put in place to ensure the structural integrity of the bund is maintained in perpetuity.

**S/1963/15/CONDG - Land To North And South Of Bartlow Road And Immediate Linton Cambridgeshire**

- As surface water flooding occurred in the vicinity of the site (namely along Bartlow Road) on the 20th July 2021, we request that any drainage related applications for the site are paused while an investigation by the LLFA takes place to assess the cause of this flooding and risk of flooding to the proposed development.

Yours sincerely,

Cambridgeshire County Council

*H Ellis*

**Hilary Ellis**

**Acting Flood Risk & Biodiversity Business Manager**
**Environment and Commercial**

*Please note: We are reliant on the accuracy and completeness of the reports in undertaking our review, and can take no responsibility for incorrect data or interpretation made by the authors.*

***If you have any queries regarding this application please contact the Officer named at the top of this letter (contact details are above).***

Cambridgeshire County Council

**My ref:** FR/21-000101
**Your ref:** S/2553/16/CONDO
**Date:** 24/02/2022
**Doc no:** 201107231
**Officer:** **Hilary Ellis**
**E Mail:** [redacted]

**Steve Cox: Executive Director**
**Place and Economy**
**Planning, Growth & Environment**

New Shire Hall
Emery Crescent
Enterprise Campus
Alconbury Weald
PE28 4YE

Karen Pell-Coggins
Greater Cambridge Shared Planning
South Cambridge Hall
Cambourne Business Park
CB23 6EA

**PROPOSAL: Submission of details required by condition 11 (Surface water drainage) of outline planning permission S/2553/16/OL**

**Land Off Horseheath Road Linton Cambridgeshire**

**Comments from Lead Local Flood Authority (LLFA)**

Dear Madam,

As you will be aware, this application has been subject to consultation since March 2021. A brief history of the LLFA involvement is summarised below:

- 19 March 2021 – LLFA requested additional information on 3 points: safety factor of the basin; exceedance flows; depths of exceedance flows
- 1 June 2021 – Following submission of additional information, the LLFA removed the objection
- 27 July 2021 – LLFA wrote to SCDC advising that whilst we had previously recommended approval of the surface water drainage scheme, significant flooding occurred in Linton on 20 July 2021 and as such we requested any applications in the area were paused until we concluded our formal flood investigation. As part of this we requested some additional information from the developer
- 9 September 2021 – LLFA wrote to SCDC following extensive discussions with the developer, SCDC, Linton Parish Council, local residents and the local MP. We advised that whilst some of our points had been addressed we still required clarification of water levels during the flood

Given the significance of the flood event that occurred and the potential relationship to the development the LLFA appointed Capita (a national civil engineering and environmental consultancy) to undertake an independent review of the application submission with a view to ultimately providing reassurance that flood risk matters had been adequately addressed.

Upon appointment of Capita, a number of meetings with SCDC, Croudace and local residents have taken place and this has resulted in several further iterations of the drainage strategy being produced.

Both the LLFA and Capita are now of the view that the design of the surface water drainage scheme is sufficient to meet local and national policy and that additional elements have been added to the scheme since it was originally submitted by Croudace in March 2021 to accord with the principles of the original Thomas Consulting report.

In summary, the system has been designed to cater for events up to and including the 1 in 100 year plus 40% allowance for climate change. Surface water will be disposed of by an infiltration basin, the size of which has been determined by the results of on-site infiltration testing. In order to treat the surface water and remove as much silt as possible features such as sumps and permeable paving have been included throughout the site. A sediment forebay has been included at the entrance to the basin to provide a final means of treatment and will allow sediments to settle out before water enters the basin. The level of treatment is in accordance with the CIRIA SuDS Manual which presents best practice.

A management company will be employed to maintain the drainage features and a table of requirements for regular, occasional and remedial maintenance actions for most features has been included within the strategy. Given the topography of the land, the applicant proposes to reinforce the banks of the infiltration basin with concrete and a freeboard of 300 mm will be maintained above the maximum water level within the basin. **We have requested the applicant to definitively include all drainage features within their maintenance plan including the bund/ditch arrangement and the bund along the western boundary of the site and around the basin.**

A factor of safety of 10 has been used in the design calculations which represents a greater value than we would typically expect to see for a residential site. A safety factor effectively reduces the infiltration rate during the analysis to account for silting up or poor maintenance.

No flooding of the drainage system is expected in the 1 in 30 year event but some flooding is expected during a 1 in 100 year plus climate change event. The applicant has provided a plan of the volumes of water expected during such an event and has confirmed that any water would be contained within the road and would flow towards the infiltration basin. During the events in which exceedance is expected, the applicant has demonstrated there would be sufficient capacity within the basin to cater for these volumes.

During the consultation process and following the flooding in July 2021, concerns were raised around the potential for overland flows emanating from off-site to flow through and across the site towards existing properties. In order to mitigate this, the applicant proposes to install a bund/swale arrangement along the eastern boundary and this will be reinforced by a concrete plug. The applicant anticipates the swale will provide approximately 360 $m^3$ of storage and water will infiltrate through the swale. Additionally, a bund will be provided along the western and southern boundaries to reduce the risk of water flowing into Lonsdale. This bund will also contain a concrete plug.

Cambridgeshire County Council

Upon receipt of a satisfactory updated maintenance plan including all aspects of the drainage scheme (including the bund/ditch arrangement and the bund along the western boundary of the site and around the basin) the LLFA will be in a position to recommend the approval of Condition 11.

**Please note: We are aware that significant parts of the site have already been built out including some drainage features. We are not able to comment on whether what has been built so far accords with the information contained within the aforementioned drainage strategy. Checks by the Local Planning Authority or Building Control should be undertaken to ensure the scheme is built in accordance with the approved details.**

Yours faithfully,

*H Ellis*

**Hilary Ellis**

**Flood Risk Business Manager**
**Environment and Commercial**

*Please note: We are reliant on the accuracy and completeness of the reports in undertaking our review and can take no responsibility for incorrect data or interpretation made by the authors.*

## Patten, Jack

**From:** Jessica Ashbridge <clerk@littleabington-pc.gov.uk>
**Sent:** 14 January 2025 15:27
**To:** Kingsway Solar Farm
**Subject:** EN010165

**Follow Up Flag:** Follow up
**Flag Status:** Flagged

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Hello,

Little Abington Parish Council strongly supports the comments made by the following Parish Councils - Balsham, West Wratting, Weston Colville, Wilbrahams, Reach, Burwell, and Swaffham Bulbeck.
There are concerns about HGV transport from the A1307 heading to the villages, as the roads are narrow, and often single track, unsuitable for large vehicles.

Kind regards
Jess Ashbridge

Clerk to Little Abington Parish Council

[redacted]

The content of this email does not represent the opinion of Little Abington Parish Council unless explicitly stated. This email (including any attachments) is intended only for the recipient(s) named above. It may contain confidential information and should not be read, copied or otherwise used by any other person unless express permission is given. If you are not a named recipient, please contact the sender and delete the email from your system. The contact details of the sender and recipients constitutes personal data. These along with any other personal data in the email (including any attachments) must be handled in accordance with the Data Protection Act 2018. It is the recipient's responsibility to ensure that appropriate measures are in place to check for software viruses.

# Lode Parish Council

41 Stow Road, Stow Cum Quy, Cambs, CB25 9AD

clerk@lode-pc.gov.uk

Tel: [redacted]

Chair: Cllr Lucy Wells  Parish Clerk:  Sam Chambers-Turner


14th January 2025

LPC/KSF/140125

Dear Sirs

**REF: EN010165**

Firstly, let me thank you for the opportunity to comment on the Environmental Impact Scoping Report for the above development wishing to receive a Development Consent Order.

The Parish Council wishes to raise awareness of this incredibly tight deadline to be able to respond to this application due to the Christmas break. Notification was received on 17th December 2024 and the closure date is 14th January 2025 with no opportunity to extend the deadline. We note that the Planning Inspectorate did make mention of this to the applicant advising against submission at that time, but this was not considered by the applicant. It is also noted that this has happened directly on the back of the public engagement events that have been held by the organisation.

As a Parish Council that will not be directly affected by the development of the Kingsway solar farm, we are unable at this stage to make comment on specifics. However, we recognise the importance of being able to comment further down the line when more details become available. We are therefore requesting that the Parish Council remain as a statutory consultee during the application process to be able to support the locality which will be majorly affected by the proposals.

**Yours faithfully**

[redacted]

**Clerk to the Council**

## Patten, Jack

**From:** [redacted]
**Sent:** 06 January 2025 12:12
**To:** Kingsway Solar Farm
**Subject:** 20250106_MOD_Response_EN010165_DIO_10065561

**Follow Up Flag:** Follow up
**Flag Status:** Flagged

> You don't often get email from [redacted]

FAO: Deb Glassop.

Thank you for consulting the Ministry of Defence (MOD) on Section 36 EIA Planning Application reference EN010165, MOD response DIO 10065561.
The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the MOD as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System.
I can confirm that, following review of the application documents, the proposed development would be considered to have no detrimental impact on the operation or capability of a defence site or asset. The MOD has no objection to the development proposed.
The MOD must emphasise that this email is provided specifically in response to the application documents and supporting information provided on the The Planning Inspectorate website as of the date of this email. Amendments to any element of the proposed development (including the location, dimensions, form, and/or finishing materials of any structure) may significantly alter how the development relates to MOD safeguarding requirements and may result in detrimental impact(s) on the operation or capability of defence sites or assets.
In the event that any:

- revised plans;
- amended plans;
- additional information; or
- further application(s)

are submitted for approval, the MOD, as a statutory consultee, should be consulted and provided with adequate time to carry out assessments and provide a formal response whether the proposed amendments are considered material or not by the determining authority.
I trust this is clear however should you have any questions please do not hesitate to contact me.

Best wishes,

**Vicki James** | Estates Safeguarding Officer

Defence Infrastructure Organisation
Estates | Safeguarding
DIO Head Office | St George's House | DMS Whittington | Lichfield | Staffordshire | WS14 9PY
Email: victoria.james105@mod.gov.uk

National Gas House
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CV34 6DA

+44 (0) 1926 65 3000
**nationalgas.com**

Submitted via email to: KingswaySolar@planninginspectorate.gov.uk

14th January 2025

Dear Sir/Madam,

**Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11**

**Application by Kingsway Solar Farm Limited (the Applicant) for an Order granting Development Consent for the Kingsway Solar Farm (the Proposed Development)**

I refer to your email dated 17/12/2024 regarding the above proposed DCO. This is a response on behalf of National Gas Transmission (NGT). Having reviewed the scoping consultation documents, NGT wishes to make the following comments regarding gas infrastructure which may be affected by proposals.

NGT has 2 feeder mains located within or in proximity to the Order limits. Details of this infrastructure is as follows:

- Feeder Main – FM03 – Roudham Heath to Gt Wilbraham
- Feeder Main – FM03 – Gt Wilbraham to Whitwell
- Cathodic Protection Groundbeds/TR
- Ancillary apparatus

Please note that NGT has existing easements for these pipelines which provides rights for ongoing access and prevents the erection of permanent / temporary buildings/structures, change to existing ground levels or storage of materials etc within the easement strip.

You should also be aware of NGT's guidance for working in proximity to its assets, further guidance and links are available as follows.

CATHODIC PROTECTION SYSTEM

To ensure a high level of safety and reliability in operation, National Gas Transmission's assets are protected by a cathodic protection system. It is essential that buried steel pipework associated with the transmission and distribution of natural gas is designed, installed, commissioned and maintained to withstand the potentially harmful effects of corrosion and that the corrosion control systems employed are monitored to ensure continued effectiveness. Installations in the vicinity of National Gas Transmission's assets which may potentially interfere with the cathodic protection system must be assessed and approved by National Gas Transmission, and appropriate control measures must be put in place where required.

Installations which have the potential to interfere with National Gas Transmission's Cathodic protection system include (but are not limited to):

1. High voltage cable crossings and parallelism

2. High voltage ac pylon parallelism

3. Battery Energy Storage Systems

4. Third party pipelines with cathodic protection systems

5. PV Solar arrays

Further information on D.C interference can be found in UKOPA/GPG/031 Edition C Microsoft Word - UKOPA GPG 031 DC Interference Ed 1.docx

Microsoft Word - UKOPA GPG 031 DC Interference Ed 1.docx (hold ctrl and click to access)Further information on A.C. interference can be found in UKOPA/GPG/027 UKOPA Good Practice GuideUKOPA Good Practice Guide (hold ctrl and click to access)

The safe limits for transfer voltage and impressed current that a high-pressure gas pipeline can be exposed to are outlined in T/PL/ECP/1, T/PL/ECP/2 and BS EN 50122-1. These are the safe limits for non-electrically trained personnel.

SOLAR FARMS

Please be aware of the specific guidance for developing solar farms near to gas transmission pipelines:

https://www.nationalgas.com/document/82936/download

UKOPA Good Practice Guide - Requirements for the Siting and Installation of Solar Photovoltaic (PV) Installations in the Vicinity of Buried Pipelines - UKOPA/GP/014 Edition 1

**Where the Promoter intends to acquire land, extinguish rights, or interfere with any of NGT's apparatus, NGT will require appropriate protection and further discussion on the impact to its apparatus and rights including adequate Protective Provisions. A Deed of Consent will also be required for any works proposed within the easement strip.**

**Key Considerations:**

- NGT has a Deed of Grant of Easement for each pipeline, which prevents the erection of permanent / temporary buildings, or structures, change to existing ground levels, storage of materials etc.

- Please be aware that written permission is required before any works commence within the NGT easement strip. Furthermore a Deed of Consent will be required prior to commencement of works within NGT's easement strip subject to approval by NGT's plant protection team.

- Any large installations which may result in a large population increase in the vicinity of a high pressure gas pipeline must comply with the HSE's Land Use Planning methodology, and the HSE response should be submitted to National Gas Transmission for review

- The below guidance is not exhaustive and all works in the vicinity of NGT's asset shall be subject to review and approval from NGT's plant protection team in advance of commencement of works on site.

General Notes on Pipeline Safety:

- You should be aware of the Health and Safety Executives guidance document HS(G) 47 "Avoiding Danger from Underground Services", and NGT's Dial Before You Dig Specification for Safe Working in the Vicinity of NGT Assets. There will be additional requirements dictated by NGT's plant protection team.

- NGT will also need to ensure that its pipelines remain accessible during and after completion of the works.

- Our pipelines are normally buried to a depth cover of 1.1 metres, however actual depth and position must be confirmed on site by trial hole investigation under the supervision of a NGT representative. Ground cover above our pipelines should not be reduced or increased.

- If any excavations are planned within 3 metres of NGT High Pressure Pipeline or, within 10 metres of an AGI (Above Ground Installation), or if any embankment or dredging works are proposed then the actual position and depth of the pipeline must be established on site in the presence of a NGT representative. A safe working method agreed prior to any work taking place in order to minimise the risk of damage and ensure the final depth of cover does not affect the integrity of the pipeline.

- Below are some examples of work types that have specific restrictions when being undertaken in the vicinity of gas assets therefore consultation with NGT's Plant Protection team is essential:

  - Demolition
  - Blasting
  - Piling and boring
  - Deep mining
  - Surface mineral extraction
  - Landfilling
  - Trenchless Techniques (e.g. HDD, pipe splitting, tunnelling etc.)
  - Wind turbine installation - minimum separation distance of 1.5x the mast/hub height is required, and any auxiliary installations such as cable or track crossings will require a deed of consent.
  - Solar farm installation
  - Tree planting schemes

Traffic Crossings:

- Where existing roads cannot be used, construction traffic should ONLY cross the pipeline at agreed locations.

- Permanent road crossings will require a surface load calculation, and will require a deed of consent.

- The pipeline shall be protected, at the crossing points, by temporary rafts constructed at ground level. The third party shall review ground conditions, vehicle types and crossing frequencies to determine the type and construction of the raft required.

- The type of raft shall be agreed with NGT prior to installation.

- No protective measures including the installation of concrete slab protection shall be installed over or near to the NGT pipeline without the prior permission of NGT

- NGT will need to agree the material, the dimensions and method of installation of the proposed protective measure.

- The method of installation shall be confirmed through the submission of a formal written method statement from the contractor to NGT.

- An NGT representative shall monitor any works within close proximity to the pipeline to comply with NGT specification T/SP/SSW22

New Asset Crossings:

- New assets (cables/pipelines etc) may cross the pipeline at perpendicular angle to the pipeline i.e. 90 degrees.

- The separation distance for a cable >33kV is 1000mm and pre and post energisation surveys may be required at National Gas Transmission's discretion. A risk assessment/method statement will need to be provided to, and accepted by National Gas Transmission prior to the deed of consent being agreed. Where a new asset is to cross over the pipeline a clearance distance of 0.6 metres between the crown of the pipeline and underside of the service should be maintained. If this cannot be achieved the service shall cross below the pipeline with a clearance distance of 0.6 metres.

- A new service should not be laid parallel within an easement strip

- Clearance must be at least 600mm above or below the pipeline

- An NGT representative shall approve and supervise any cable crossing of a pipeline.

- A Deed of Consent is required for any cable crossing the easement

**Where the promoter intends to acquire land, extinguish rights, or interfere with any of NGT apparatus, protective provisions will be required in a form acceptable to it to be included within the DCO. NGT requests to be consulted at the earliest stages to ensure that the most appropriate protective provisions are included within the DCO application to safeguard the integrity of our apparatus and to remove the requirement for objection.**

**Adequate access to NGT pipelines must be maintained at all times during construction and post construction to ensure the safe operation of our network.**

Yours Faithfully

Asset Protection Team

**Further Safety Guidance**

To download a copy of the HSE Guidance HS(G)47, please use the following link:

https://www.hse.gov.uk/pubns/books/hsg47.htm

Working Near National Gas Assets

https://www.nationalgas.com/land-and-assets/working-near-our-assets

Specification for Safe Working in the Vicinity of National Gas High Pressure Pipelines and Associated Installations

https://www.nationalgas.com/document/82951/download

Tree Planting Guidance

https://www.nationalgas.com/document/82976/download

Excavating Safely

https://www.nationalgas.com/document/82971/download

Dial Before You Dig Guidance

https://www.nationalgas.com/document/128751/download

Essential Guidance:

https://www.nationalgas.com/gas-transmission/document/82931/download

Solar Farm Guidance

https://www.nationalgas.com/document/82936/download

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Warwick Technology Park
Gallows Hill, Warwick
CV34 6DA

Tiffany Bate
Development Liaison Officer
UK Land and Property
[redacted]
+44 (0)[redacted]

www.nationalgrid.com

SUBMITTED ELECTRONICALLY:
KingswaySolar@planninginspectorate.gov.uk

14 January 2025

Dear Sir/Madam

**APPLICATION BY KINGSWAY SOLAR FARM LIMITED (THE APPLICANT) FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE KINGSWAY SOLAR FARM PROJECT (THE PROPOSED DEVELOPMENT)**

**SCOPING CONSULTATION RESPONSE**

I refer to your letter dated 17th December 2024 in relation to the above proposed application. This is a response on behalf of National Grid Electricity Transmission PLC (NGET).

Having reviewed the scoping report, I would like to make the following comments regarding NGET existing or future infrastructure within or in close proximity to the current red line boundary.

NGET has high voltage electricity overhead transmission lines, underground cables and a high voltage substation within the scoping area. The overhead lines and substation forms an essential part of the electricity transmission network in England and Wales.

**Existing Infrastructure**

Substation

- BURWELL MAIN 132 kV Substation
- BURWELL MAIN 400 kV Substation
- Associated overhead and underground apparatus including cables

Overhead Lines

| | |
|---|---|
| 4ZM 400 kV OHL | BURWELL MAIN - PELHAM 1 |
| | BURWELL MAIN - PELHAM 2 |
| 4ZM 400 kV OHL | BURWELL MAIN - WALPOLE 1 |
| | BURWELL MAIN - WALPOLE 2 |

Cable Apparatus

- Cable Fibre: BURWELL - EATON SOCON
- Unknown underground cable in Burwell vicinity

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Registered Office: 1-3 Strand, London WC2N 5EH
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CV34 6DA

I enclose a plan showing the location of NGET's apparatus in the scoping area.

**New infrastructure**

Please refer to the Holistic Network Design (HND) and the National Grid ESO website to view the strategic vision for the UK's ever growing electricity transmission network. https://www.nationalgrideso.com/future-energy/the-pathway-2030-holistic-network-design/hnd'

NGET requests that all existing and future assets are given due consideration given their criticality to distribution of energy across the UK. We remain committed to working with the promoter in a proactive manner, enabling both parties to deliver successful projects wherever reasonably possible. As such we encourage that ongoing discussion and consultation between both parties is maintained on interactions with existing or future assets, land interests, connections or consents and any other NGET interests which have the potential to be impacted prior to submission of the Proposed DCO.

The Great Grid Upgrade is the largest overhaul of the electricity grid in generations, we are in the middle of a transformation, with the energy we use increasingly coming from cleaner greener sources. Our infrastructure projects across England and Wales are helping to connect more renewable energy to homes and businesses. To find out more about our current projects please refer to our network and infrastructure webpage. https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects. Where it has been identified that your project interacts with or is in close proximity to one of NGET's infrastructure projects, we would welcome further discussion at the earliest opportunity.

These projects are all essential to increase the overall network capability to connect the numerous new offshore wind farms that are being developed, and transport new clean green energy to the homes and businesses where it is needed.

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Specific Comments – Electricity Infrastructure:

- NGET's Overhead Line/s is protected by a Deed of Easement/Wayleave Agreement which provides full right of access to retain, maintain, repair and inspect our asset

- Statutory electrical safety clearances must be maintained at all times. Any proposed buildings must not be closer than 5.3m to the lowest conductor. NGET recommends that no permanent structures are built directly beneath overhead lines. These distances are set out in EN 43 – 8 Technical Specification for "overhead line clearances Issue 5 (2019)".

- If any changes in ground levels are proposed either beneath or in close proximity to our existing overhead lines then this would serve to reduce the safety clearances for such overhead lines. Safe clearances for existing overhead lines must be maintained in all circumstances.

- The relevant guidance in relation to working safely near to existing overhead lines is contained within the Health and Safety Executive's (www.hse.gov.uk) Guidance Note GS 6 "Avoidance of Danger from Overhead Electric Lines" and all relevant site staff should make sure that they are both aware of and understand this guidance.

- Plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors when those conductors are under their worse conditions of maximum "sag" and "swing" and overhead line profile (maximum "sag" and "swing") drawings should be obtained using the contact details above.

- If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.

- Drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations or "pillars of support" of any existing tower. These foundations always extend beyond the base area of the existing tower and foundation ("pillar of support") drawings can be obtained using the contact details above.

- NGET high voltage underground cables are protected by a Deed of Grant; Easement; Wayleave Agreement or the provisions of the New Roads and Street Works Act. These provisions provide NGET full right of access to retain, maintain, repair and inspect our assets. Hence we require that no permanent / temporary structures are to be built over our cables or within the easement strip. Any such proposals should be discussed and agreed with NGET prior to any works taking place.

- Ground levels above our cables must not be altered in any way. Any alterations to the depth of our cables will subsequently alter the rating of the circuit and can compromise the reliability, efficiency and safety of our electricity network and requires consultation with National Grid prior to any such changes in both level and construction being implemented.

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To download a copy of the HSE Guidance HS(G)47, please use the following link: http://www.hse.gov.uk/pubns/books/hsg47.htm

**Further Advice**

**We would request that the potential impact of the proposed scheme on NGET's existing and future assets as set out above and including any proposed diversions is considered in any subsequent reports, including in the Environmental Statement, and as part of any subsequent application.**

**Where any diversion of apparatus may be required to facilitate a scheme, NGET is unable to give any certainty with the regard to diversions until such time as adequate conceptual design studies have been undertaken by NGET. Further information relating to this can be obtained by contacting the email address below.**

**Where the promoter intends to acquire land, extinguish rights, or interfere with any of NGET apparatus, protective provisions will be required in a form acceptable to it to be included within the DCO.**

NGET requests to be consulted at the earliest stages to ensure that the most appropriate protective provisions are included within the DCO application to safeguard the integrity of our apparatus and to remove the requirement for objection. All consultations should be sent to the following email address: **box.landandacquisitions@nationalgrid.com**

I hope the above information is useful. If you require any further information, please do not hesitate to contact me.

The information in this letter is provided not withstanding any discussions taking place in relation to connections with electricity customer services.

Yours faithfully

[redacted]

**Tiffany Bate**
**Development Liaison Officer**
**Commercial and Customer Connections**
**Electricity Transmission Property Land and Property**

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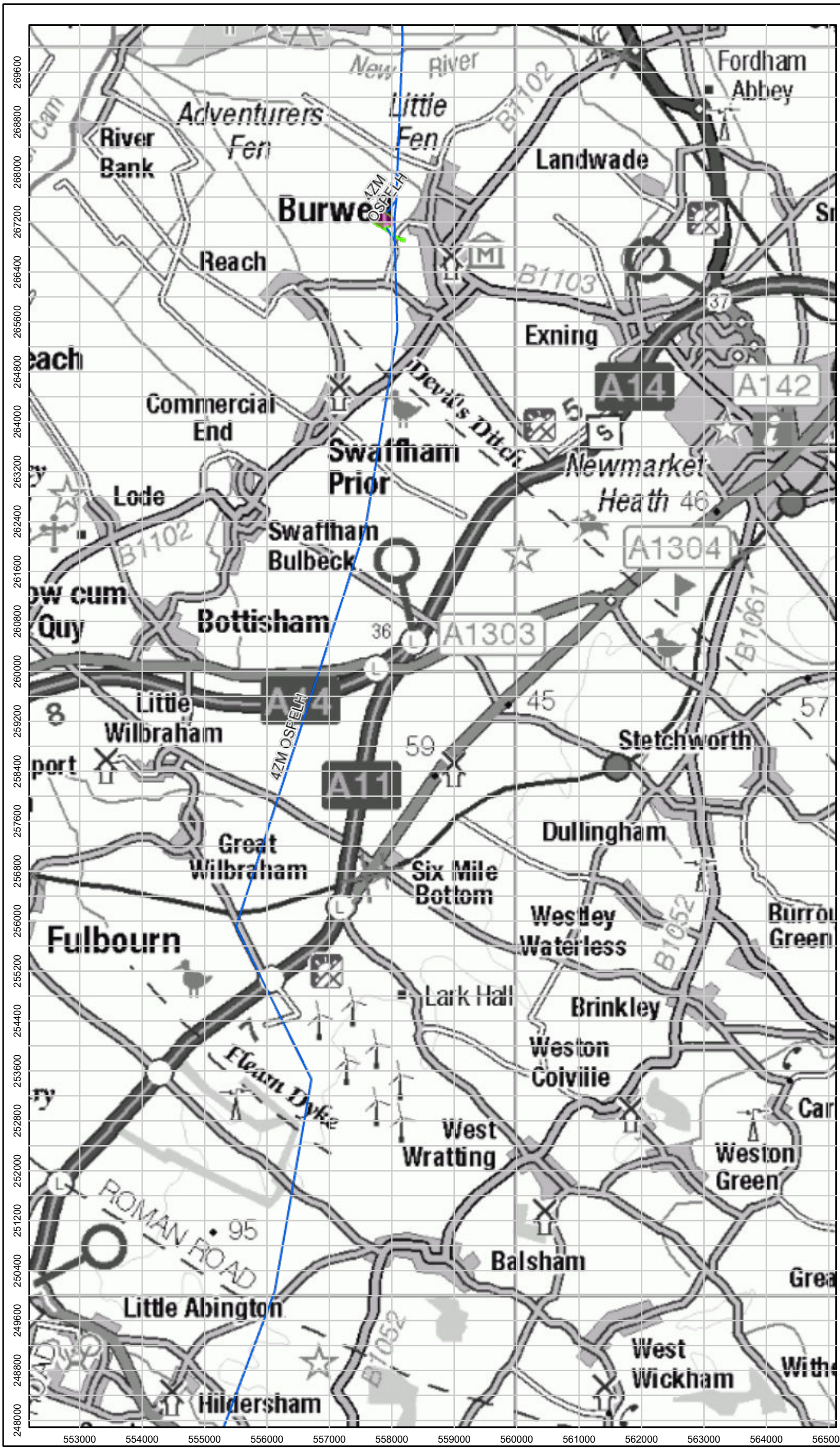

**Legend**

Buried Cable

- Buried Cable Commissioned

OHL 400Kv

- OHL 400Kv Commissioned

Substations

- Substations Commissioned

Notes

0 0.5 1 2 3 4 km

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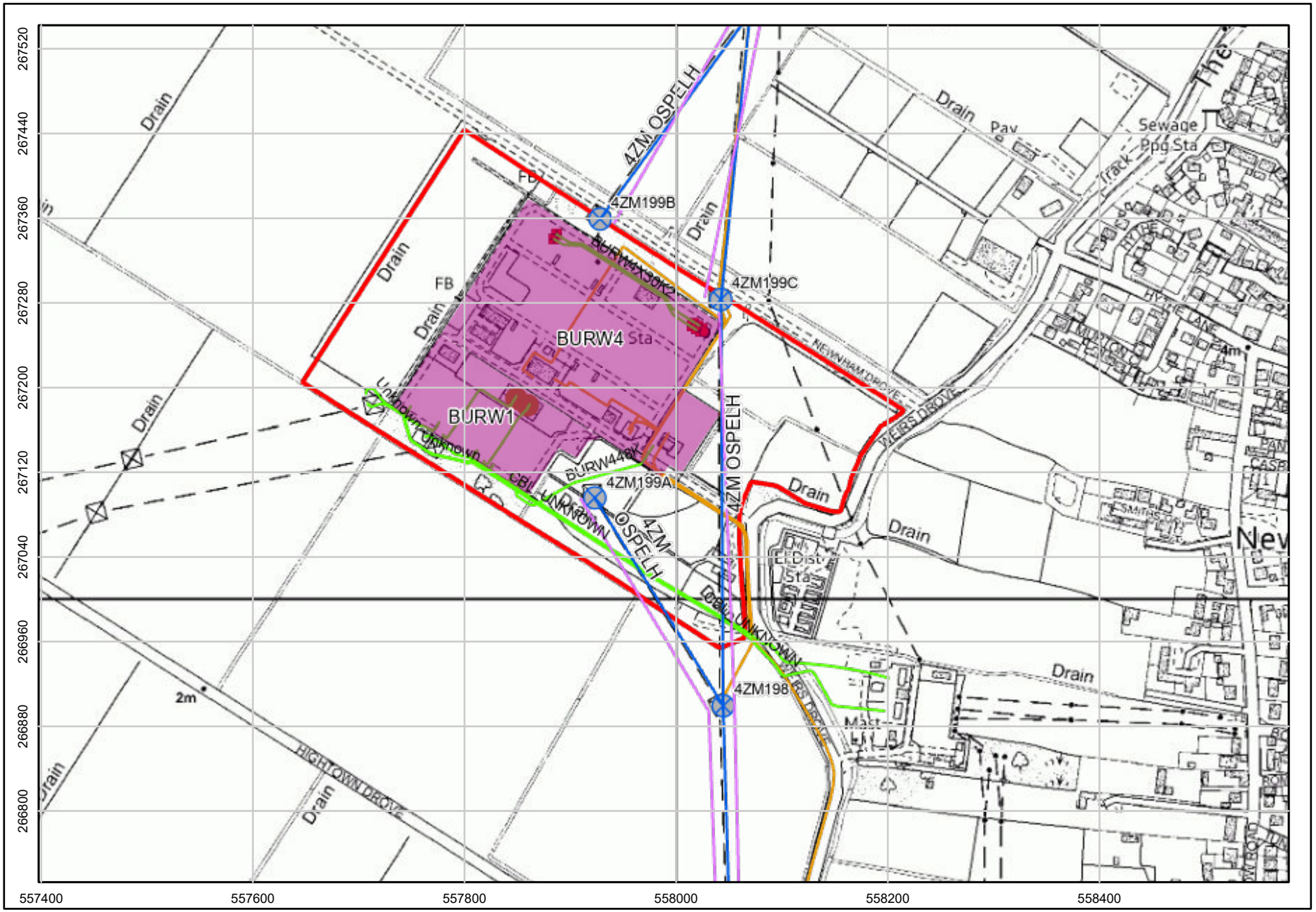


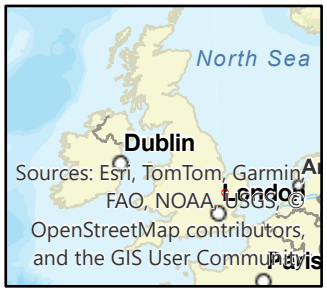


**Legend**

- Electric Land Ownership
  - Electric Land Ownership - Freehold
- Telecoms
  - RAMM
- Cable Accessories
  - Joint Bay
  - Gauge
  - Link Box
  - Oil Tank
  - Pillar
- Fibre Cable
  - Fibre Cable Commissioned
- Buried Cable
  - Buried Cable Commissioned
- Towers
  - Towers Commissioned
- OHL 400Kv
  - OHL 400Kv Commissioned
- OHL Circuits
  - Commissioned
- Substations
  - Substations Commissioned

## Notes

0 0.4 0.8 1.6 2.4 3.2 km

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Technical Guidance Note 287

# Third-party guidance for working near National Grid Electricity Transmission equipment

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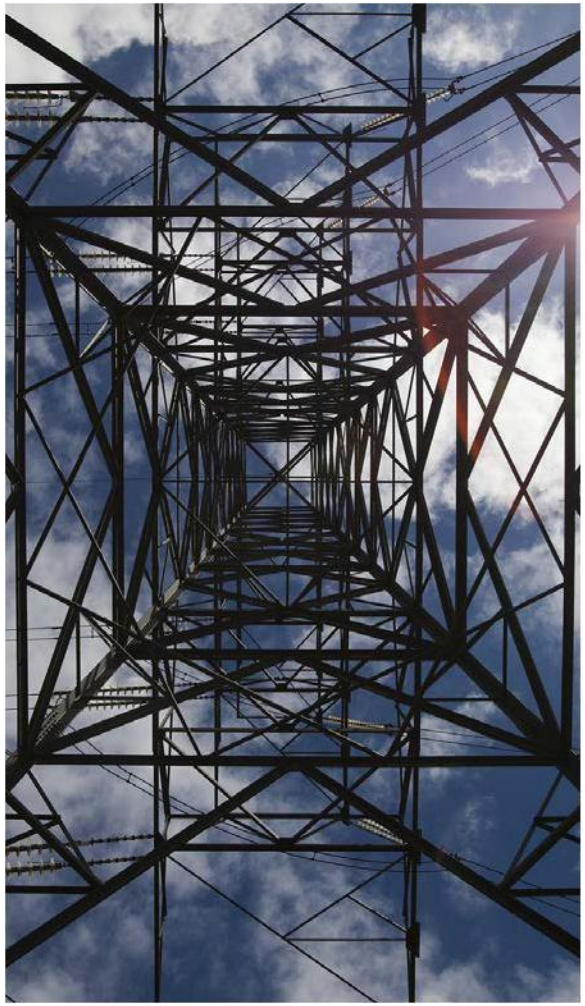

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# Purpose and scope

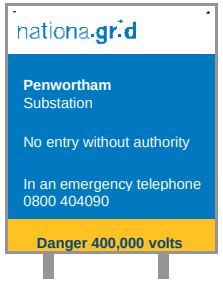
The purpose of this document is to give guidance and information to third parties who are proposing, scheduling or designing developments close to National Grid Electricity Transmission assets.

The scope of the report covers information on basic safety and the location of our assets – and also highlights key issues around particular types of development and risk areas.

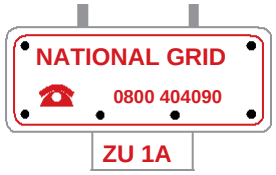
In the case of electrical assets, National Grid does not authorise or agree safe systems of work with developers and contractors. However, we will advise on issues such as electrical safety clearances and the location of towers and cables. We also work with developers to minimise the impact of any National Grid assets that are nearby.

## How to identify specific National Grid sites

**Substations**
The name of the Substation and emergency contact number will be on the site sign.




**Overhead Lines**
The reference number of the tower and the emergency contact number will be on this type of sign.




## Contact National Grid

### Plant protection

For routine enquiries regarding planned or scheduled works, contact the Asset Protection team online, by email or phone.

**www.lsbud.co.uk**

**Email:** assetprotection@nationalgrid.com

**Phone:** 0800 001 4282

### Emergencies

In the event of occurrences such as a cable strike, coming into contact with an overhead line conductor or identifying any hazards or problems with National Grid's equipment, phone our emergency number 0800 404 090 (option 1).

If you have apparatus within 30m of a National Grid asset, please ensure that the emergency number is included in your site's emergency procedures.

### Consider safety

Consider the hazards identified in this document when working near electrical equipment

# Part 1

## Electricity transmission infrastructure

National Grid owns and maintains the high-voltage electricity transmission network in England and Wales (Scotland has its own networks). It's responsible for balancing supply with demand on a minute-by-minute basis across the network.

### Overhead lines

Overhead lines consist of two main parts – pylons (also called towers) and conductors (or wires). Pylons are typically steel lattice structures mounted on concrete foundations. A pylon's design can vary due to factors such as voltage, conductor type and the strength of structure required.

Conductors, which are the 'live' part of the overhead line, hang from pylons on insulators. Conductors come in several different designs depending on the amount of power that is transmitted on the circuit.

In addition to the two main components, some Overhead Line Routes carry a Fibre Optic cable between the towers with an final underground connection to the Substations.

In most cases, National Grid's overhead lines operate at 275kV or 400kV.

### Underground cables

Underground cables are a growing feature of National Grid's network. They consist of a conducting core surrounded by layers of insulation and armour. Cables can be laid in the road, across open land or in tunnels. They operate at a range of voltages, up to 400kV.

### Substations

Substations are found at points on the network where circuits come together or where a rise or fall in voltage is required. Transmission substations tend to be large facilities containing equipment such as power transformers, circuit breakers, reactors and capacitors. In addition Diesel generators and compressed air systems can be located there.

# Part 2

## Statutory requirements for working near high-voltage electricity

The legal framework that regulates electrical safety in the UK is *The Electricity Safety, Quality and Continuity Regulations (ESQCR) 2002*. This also details the minimum electrical safety clearances, which are used as a basis for the Energy Networks Association (ENA) TS 43-8. These standards have been agreed by CENELEC (European Committee for Electrotechnical Standardisation) and also form part of the *British Standard BS EN 50341-1:2012 Overhead Electrical Lines exceeding AC 1kV*. All electricity companies are bound by these rules, standards and technical specifications. They are required to uphold them by their operator's licence.

### Electrical safety clearances

It is essential that a safe distance is kept between the exposed conductors and people and objects when working near National Grid's electrical assets. A person does not have to touch an exposed conductor to get a life-threatening electric shock. At the voltages National Grid operates at, it is possible for electricity to jump up to several metres from an exposed conductor and kill or cause serious injury to anyone who is nearby. For this reason, there are several legal requirements and safety standards that must be met.

Any breach of legal safety clearances will be enforced in the courts. This can and has resulted in the removal of an infringement, which is normally at the cost of the developer or whoever caused it to be there. Breaching safety clearances, even temporarily, risks a serious incident that could cause serious injury or death.

National Grid will, on request, advise planning authorities, developers or third parties on any safety clearances and associated issues. We can supply detailed drawings of all our overhead line assets marked up with relevant safe areas.

« Section continued from previous page

## Your Responsibilities - Overhead lines

Work which takes place near overhead power lines carries a significant risk of coming into proximity with the wires.  If any person, object or material gets too close to the wires, electricity could ‘flashover’ and be conducted to earth, causing death or serious injury. You do not need to touch the wires for this to happen. The law requires that work is carried out in close proximity to live overhead power lines only when there is no alternative, and only when the risks are acceptable and can be properly controlled. Statutory clearances exist which must be maintained, as prescribed by the Electricity Safety, Quality and Continuity Regulations 2002.

Under the Health and Safety at Work etc. Act 1974 and Management of Health and Safety at Work Regulations 1999, you are responsible for preparing a suitable and sufficient risk assessment and safe systems of work, to ensure that risks are managed properly and the safety of your workforce and others is maintained. Your risk assessment must consider and manage all of the significant risks and put in place suitable precautions/controls in order to manage the work safely. You are also responsible for ensuring that the precautions identified are properly implemented and stay in place throughout the work.

Work near overhead power lines must always be conducted in accordance with GS6, ‘avoiding danger from overhead power lines’, and any legislation which is relevant to the work you are completing.

.

## What National Grid will provide

National Grid can supply profile drawings in PDF and CAD format showing tower locations and relevant clearances to assist you in the risk assessment process.

## What National Grid will not provide

National Grid will not approve safe systems of work or approve design proposals

# Part 3

## What National Grid will do for you and your development

### Provision of information

National Grid should be notified during the planning stage of any works or developments taking place near our electrical assets, ideally a minimum notification period of 8 weeks to allow National Grid to provide the following services:

#### Drawings

National Grid will provide relevant drawings of overhead lines or underground cables to make sure the presence and location of our services are known. Once a third party or developer has contacted us, we will supply the drawings for free.

#### Risk or impact identification

National Grid can help identify any hazards or risks that the presence of our assets might bring to any works or developments. This includes both the risk to safety from high-voltage electricity and longer-term issues, such as induced currents, noise and maintenance access that may affect the outcome of the development. National Grid will not authorise specific working procedures, but we can provide advice on best practice.

**400kV**

*The maximum nominal voltage of the underground cables in National Grid's network*

# Risks or hazards to be aware of

This section includes a brief description of some of the hazards and issues that a third party or developer might face when working or developing close to our electrical infrastructure.

## Land and access

National Grid has land rights in place with landowners and occupiers, which cover our existing overhead lines and underground cable network. These agreements, together with legislation set out under the *Electricity Act 1989*, allow us to access our assets to maintain, repair and renew them. The agreements also lay down restrictions and covenants to protect the integrity of our assets and meet safety regulations. Anyone proposing a development close to our assets should carefully examine these agreements.

Our agreements often affect land both inside and outside the immediate vicinity of an asset. Rights will include the provision of access, along with restrictions that ban the development of land through building, changing levels, planting and other operations. Anyone looking to develop close to our assets must consult with National Grid first.

## For further information, contact Asset Protection:

**Email: assetprotection@nationalgrid.com**
**Phone: 0800 001 4282**

## Electrical clearance from overhead lines

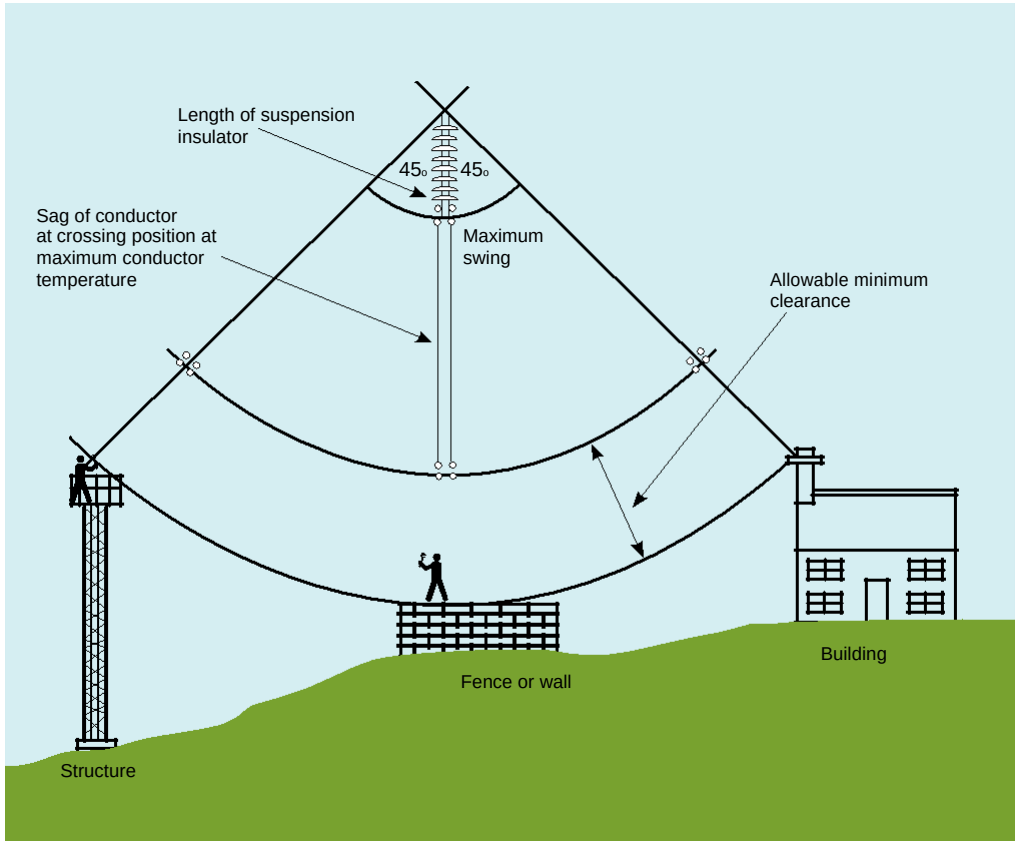
*The clearance distances referred to in this section are specific to 400kV overhead lines. National Grid can advise on the distances required around different voltages i.e. 132kV and 275kV.*

As we explained earlier, *Electrical Networks Association TS 43-8* details the legal clearances to our overhead lines. The minimum clearance between the conductors of an overhead line and the ground is 7.3m at maximum sag. The sag is the vertical distance between the wire's highest and lowest point. Certain conditions, such as power flow, wind speed and air temperature can cause conductors to move and allowances should be made for this.

The required clearance from the point where a person can stand to the conductors is 5.3m. To be clear, this means there should be at least 5.3m from where someone could stand on any structure (i.e. mobile and construction equipment) to the conductors. Available clearances will be assessed by National Grid on an individual basis.

National Grid expects third parties to implement a safe system of work whenever they are near Overhead Lines.

***Diagram not to scale***




***There should be at least 5.3m between the conductors and any structure someone could stand on***

We recommend that guidance such as *HSE Guidance Note GS6 (Avoiding Danger from Overhead Power Lines)* is followed, which provides advice on how to avoid danger from all overhead lines, at all voltages. If you are carrying out work near overhead lines you must contact National Grid, who will provide the relevant profile drawings.

**7.3m**

***The required minimum clearance between the conductors of an overhead line, at maximum sag, and the ground***

Section continues on next page »

*The undergrounding of electricity cables at Ross-on-Wye*

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**Underground cables** Underground cables operating at up to 400kV are a significant part of the National Grid Electricity Transmission network. When your works will involve any ground disturbance it is expected that a safe system of work is put in place and that you follow guidance such as *HSG 47 (Avoiding Danger from Underground Services)*.

You must contact National Grid to find out if there are any underground cables near your proposed works. If there are, we will provide cable profiles and location drawings and, if required, on-site supervision of the works. Cables can be laid under roads or across industrial or agricultural land. They can even be layed in canal towpaths and other areas that you would not expect.

Cables crossing any National Grid high-voltage (HV) cables directly buried in the ground are required to maintain a minimum seperation that will be determined by National Grid on a case-by-case basis. National Grid will need to do a rating study on the existing cable to work out if there are any adverse effects on either cable rating. We will only allow a cable to cross such an area once we know the results of the re-rating. As a result, the clearance distance may need to be increased or alternative methods of crossing found.

For other cables and services crossing the path of our HV cables, National Grid will need confirmation that published standards and clearances are met.

## Impressed voltage

Any conducting materials installed near high-voltage equipment could be raised to an elevated voltage compared to the local earth, even when there is no direct contact with the high-voltage equipment. These impressed voltages are caused by inductive or capacitive coupling between the high-voltage equipment and nearby conducting materials and can occur at distances of several metres away from the equipment. Impressed voltages may damage your equipment and could potentially injure people and animals, depending on their severity. Third parties should take impressed voltages into account during the early stages and initial design of any development, ensuring that all structures and equipment are adequately earthed at all times.

Section continues on next page »

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## Earth potential rise

Under certain system fault conditions – and during lightning storms – a rise in the earth potential from the base of an overhead line tower or substation is possible. This is a rare phenomenon that occurs when large amounts of electricity enter the earth. This can pose a serious hazard to people or equipment that are close by.

We advise that developments and works are not carried out close to our tower bases, particularly during lightning storms.

## Noise

Noise is a by-product of National Grid's operations and is carefully assessed during the planning and construction of any of our equipment. Developers should consider the noise emitted from National Grid's sites or overhead lines when planning any developments, particularly housing. Low-frequency hum from substations can, in some circumstances, be heard up to 1km or more from the site, so it is essential that developers find adequate solutions for this in their design. Further information about likely noise levels can be provided by National Grid.

## Maintenance access

National Grid needs to have safe access for vehicles around its assets and work that restricts this will not be allowed.
In terms of our overhead lines, we wouldn't want to see any excavations made, or permanent structures built, that might affect the foundations of our towers. The size of the foundations around a tower base depends on the type of tower that is built there. If you wish to carry out works within 30m of the tower base, contact National Grid for more information. Our business has to maintain access routes to tower bases with land owners. For that reason, a route wide enough for an HGV must be permanently available. We may need to access our sites, towers, conductors and underground cables at short notice.

**30m**

***If you wish to carry out work within this distance of the tower base, you must contact National Grid for more information***

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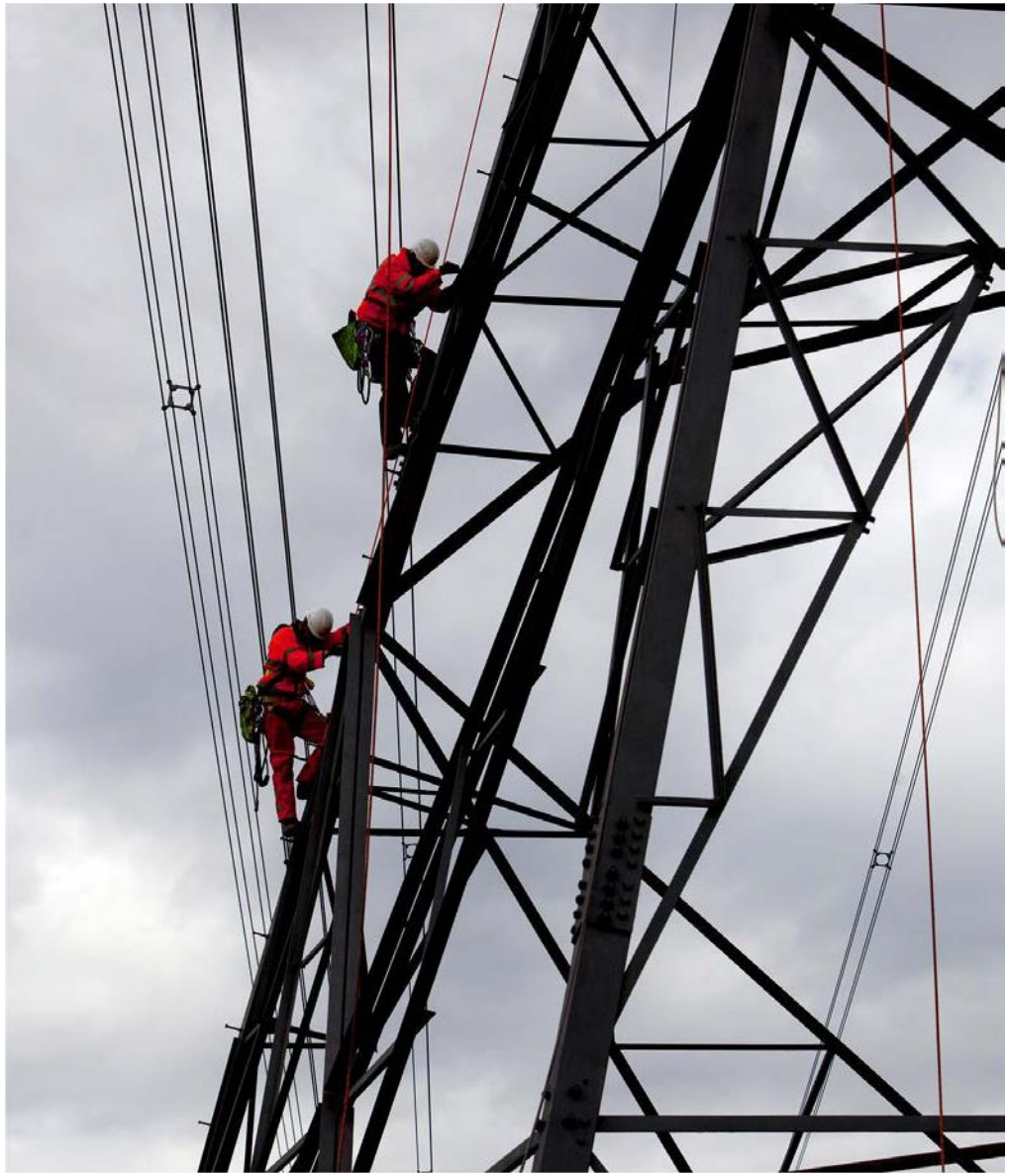

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## Fires and firefighting

National Grid does not recommend that any type of flammable material is stored under overhead lines. Developers should be aware that in certain cases the local fire authority will not use water hoses to put out a fire if there are live, high-voltage conductors within 30m of the seat of the fire *(as outlined in ENA TS 43-8)*.

In these situations, National Grid would have to be notified and reconfigure the system – to allow staff to switch out the overhead line – before any firefighting could take place. This could take several hours.

We recommend that any site which has a specific hazard relating to fire or flammable material should include National Grid's emergency contact details (found at the beginning and end of this document) in its fire plan information, so any incidents can be reported.

Developers should also make sure their insurance cover takes into account the challenge of putting out fires near our overhead lines.

## Excavations, piling or tunnelling

You must inform National Grid of any works that have the potential to disturb the foundations of our substations or overhead line towers. This will have to be assessed by National Grid engineers before any work begins.

*BS ISO 4866:2010* states that a minimum distance of 200m should be maintained when carrying out quarry blasting near our assets. However, this can be reduced with specific site surveys and changes to the maximum instantaneous charge (the amount of explosive detonated at a particular time).

All activities should observe guidance layed out in *BS 5228-2:2009*.

## Microshocks

High-voltage overhead power lines produce an electric field. Any person or object inside this field that isn't earthed picks up an electrical charge. When two conducting objects – one that is grounded and one that isn't – touch, the charge can equalise and cause a small shock, known as a microshock. While they are not harmful, they can be disturbing for the person or animal that suffers the shock.

For these reasons, metal-framed and metal-clad buildings which are close to existing overhead lines should be earthed to minimise the risk of microshocks. Anything that isn't earthed, is conductive and sits close to the lines is likely to pick up a charge. Items such as deer fences, metal palisade fencing, chain-link fences and metal gates underneath overhead lines all need to be earthed.

For further information on microshocks please visit **www.emfs.info.**

**200m**

*The minimum distance that should be maintained from National Grid assets when quarry blasting*

# Specific development guidance

## Wind farms

National Grid's policy towards wind farm development is closely connected to the *Electricity Networks Association Engineering Recommendation L44 Separation between Wind Turbines and Overhead Lines, Principles of Good Practice.* The advice is based on national guidelines and global research. It may be adjusted to suit specific local applications.

There are two main criteria in the document:

(i) The turbine shall be far enough away to avoid the possibility of toppling onto the overhead line

(ii) The turbine shall be far enough away to avoid damage to the overhead line from downward wake effects, also known as turbulence

The toppling distance is the minimum horizontal distance between the worst-case pivot point of the wind turbine and the conductors hanging in still air. It is the greater of:

- the tip height of the turbine plus 10%
- or, the tip height of the turbine plus the electrical safety distance that applies to the voltage of the overhead line.

To minimise the downward wake effect on an overhead line, the wind turbine should be three times the rotor distance away from the centre of the overhead line.

Wake effects can prematurely age conductors and fittings, significantly reducing the life of the asset. For that reason, careful consideration should be taken if a wind turbine needs to be sited within the above limits. Agreement from National Grid will be required.

## Commercial and housing developments

National Grid has developed a document called *Design guidelines for development near pylons and HVO power lines*, which gives advice to anyone involved in planning or designing large-scale developments that are crossed by, or close to, overhead lines.

The document focuses on existing 275kV and 400kV overhead lines on steel lattice towers, but can equally apply to 132kV and below. The document explains how to design large-scale developments close to high-voltage lines, while respecting clearances and the development's visual and environmental impact.

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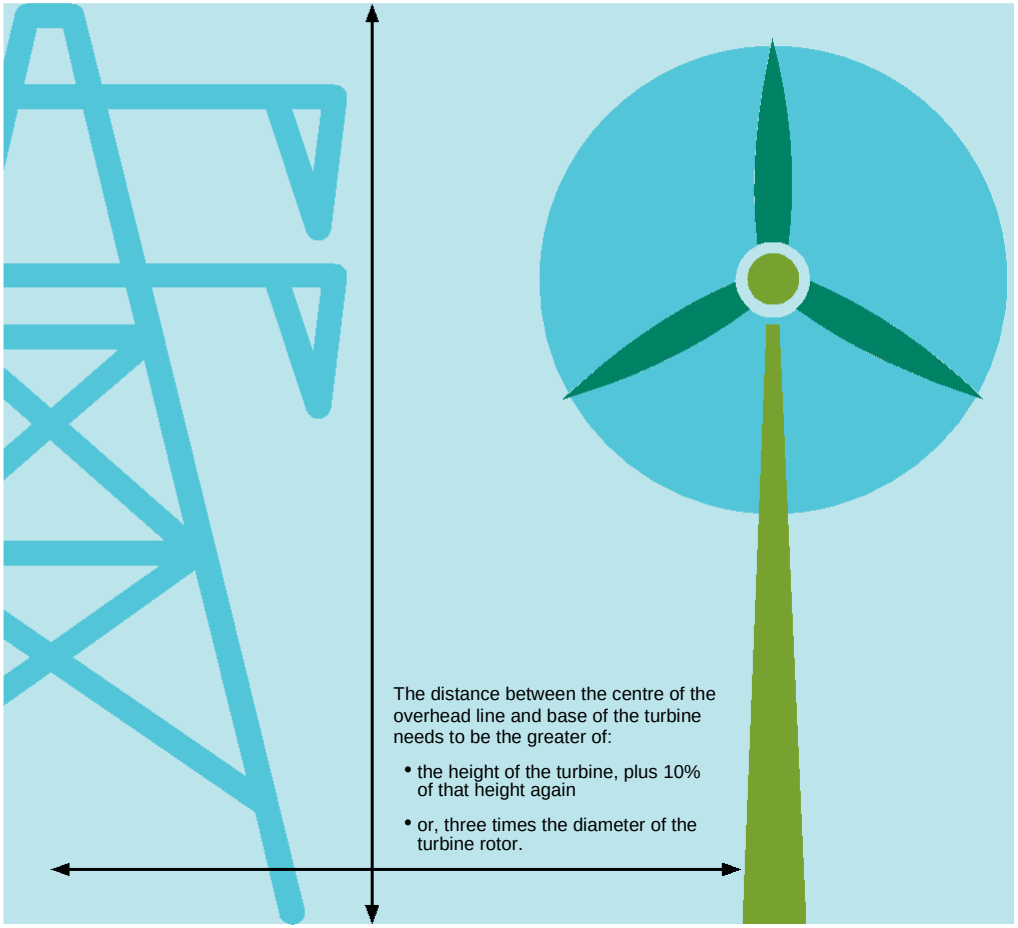
***Diagram not to scale***




***Turbines should be far enough away to avoid the possibility of toppling onto the overhead line***

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The advice is intended for developers, designers, landowners, local authorities and communities, but is not limited to those organisations.

Overall, developers should be aware of all the hazards and issues relating to the electrical equipment that we have discussed when designing new housing.

As we explored earlier, National Grid's assets have the potential to create noise. This can be low frequency and tonal, which makes it quite noticeable. It is the responsibility of developers to take this into account during the design stage and find an appropriate solution.

## Solar farms

While there is limited research and recommendations available, there are several key factors to consider when designing Solar Farms in the vicinity of Overhead Power Lines.

Developers may be looking to build on arable land close to National Grid's assets. In keeping with the safety clearance limits that we outlined earlier for solar panels directly underneath overhead line conductors, the highest point on the solar panels must be no more than 5.3m from the lowest conductors.

This means that the maximum height of any structure will need to be determined to make sure safety clearance limits aren't breached. This could be as low as 2m. National Grid will supply profile drawings to aid the planning of solar farms and determine the maximum height of panels and equipment.

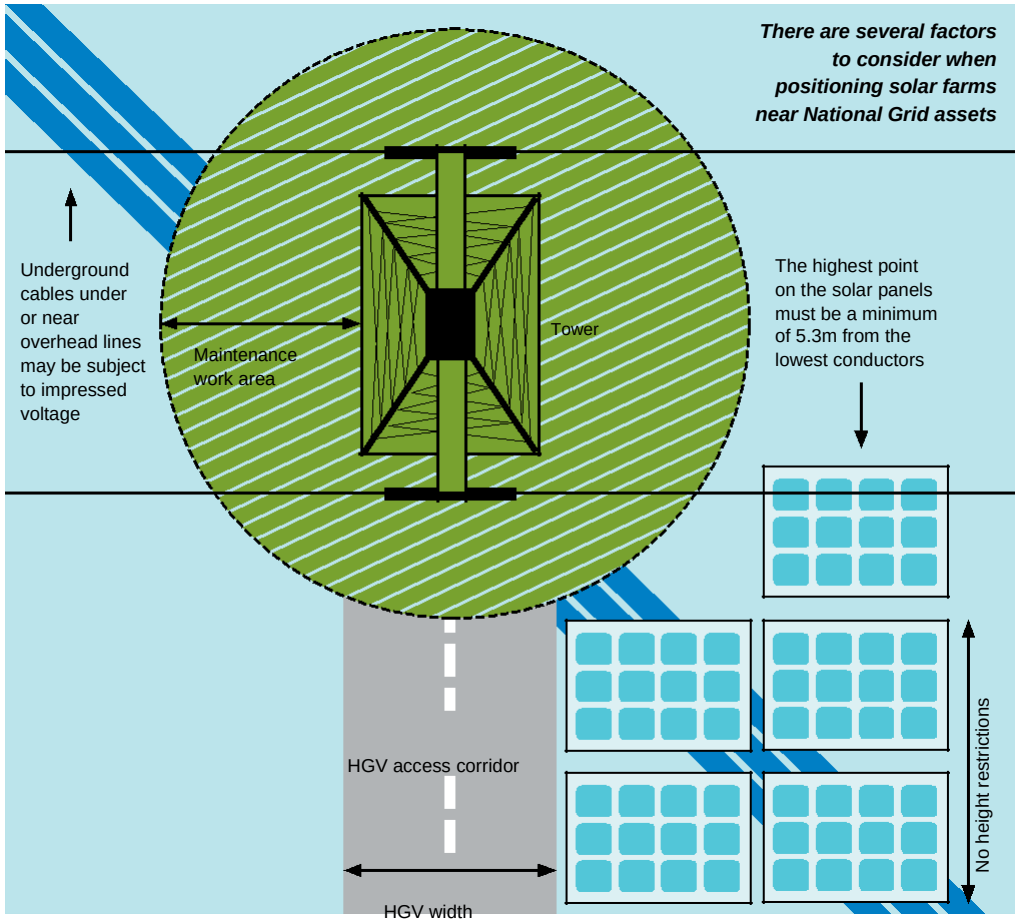
Solar panels that are directly underneath power lines risk being damaged on the rare occasion that a conductor or fitting falls to the ground. A more likely risk is ice falling from conductors or towers in winter and damaging solar panels.

There is also a risk of damage during adverse weather conditions, such as lightning storms, and system faults. As all our towers are earthed, a weather event such as lightning can cause a rise in the earth potential around the base of a tower. Solar panel support structures and supply cables should be adequately earthed and bonded together to minimise the effects of this temporary rise in earth potential.

Any metallic fencing that is located under an overhead line will pick up an electrical charge. For this reason, it will need to be adequately earthed to minimise microshocks to the public.

For normal, routine maintenance and in an emergency National Grid requires unrestricted access to its assets. So if a tower is enclosed in a solar farm compound, we will need full access for our vehicles, including access through any compound gates. During maintenance – and especially re-conductoring – National Grid would need enough space near our towers for winches and cable drums. If enough space is not available, we would require solar panels to be temporarily removed.

***Diagram not to scale***



# Asset protection agreements

In some cases, where there is a risk that development will impact on National Grid's assets, we will insist on an asset protection agreement being put in place. The cost of this will be the responsibility of the developer or third party.

# Contact details

### Emergency situations

If you spot a potential hazard on or near an overhead electricity line, do not approach it, even at ground level. Keep as far away as possible and follow the six steps below:

- Warn anyone close by to evacuate the area
- Call our 24-hour electricity emergency number: 0800 404 090 (Option 1)[1]
- Give your name and contact phone number
- Explain the nature of the issue or hazard
- Give as much information as possible so we can identify the location – i.e. the name of the town or village, numbers of nearby roads, postcode and (ONLY if it can be observed without putting you or others in danger) the tower number of an adjacent pylon
- Await further contact from a National Grid engineer

[1] It is critically important that you don't use this phone number for any other purpose. If you need to contact National Grid for another reason please use our Contact Centre at www2.nationalgrid.com/contact-us to find the appropriate information or call 0800 0014282.

### Routine enquiries

Email:
assetprotection@nationalgrid.com

Call Asset Protection on:
0800 0014282

Opening hours:
Monday to Friday 08:00-16:00

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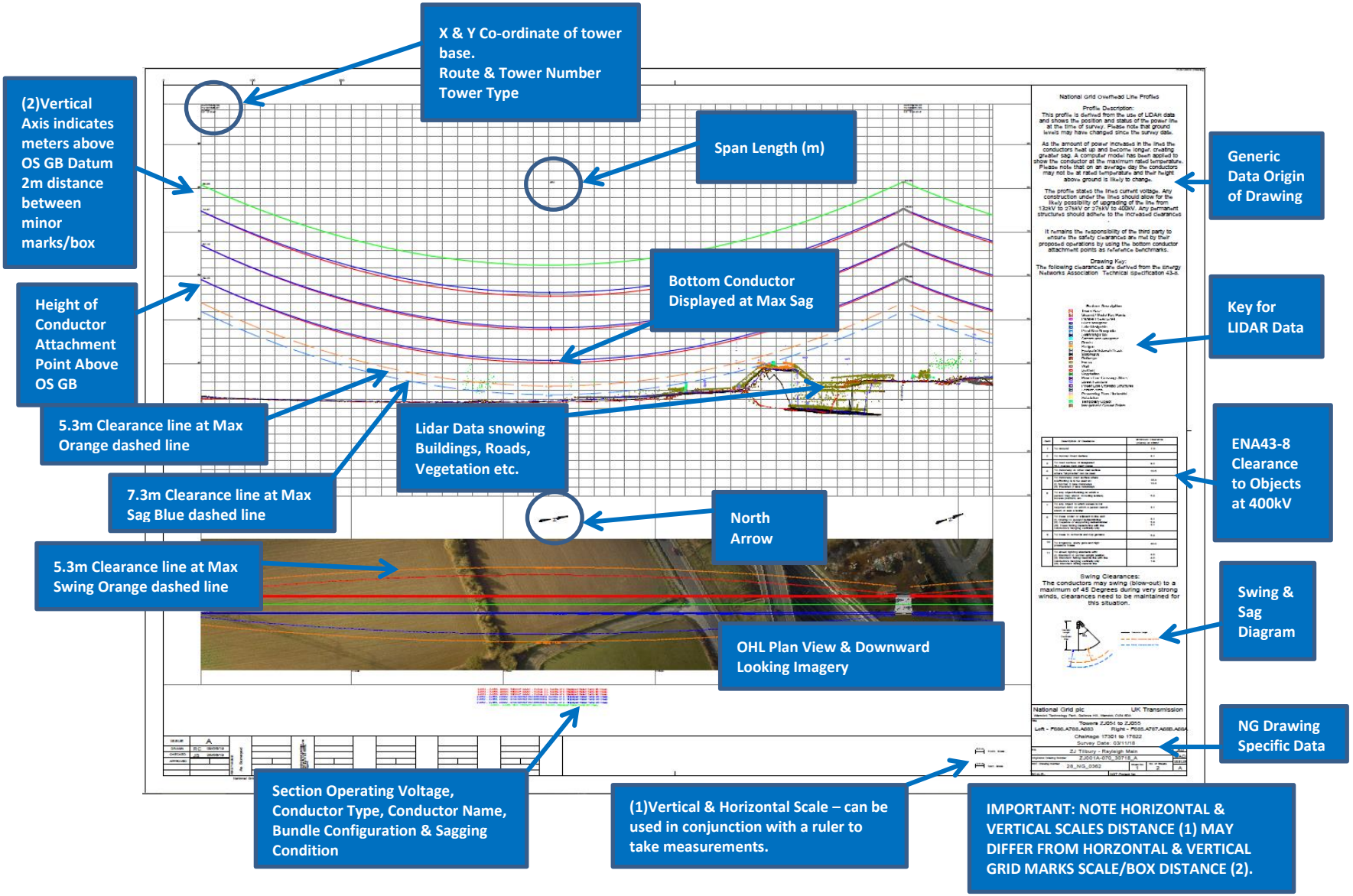
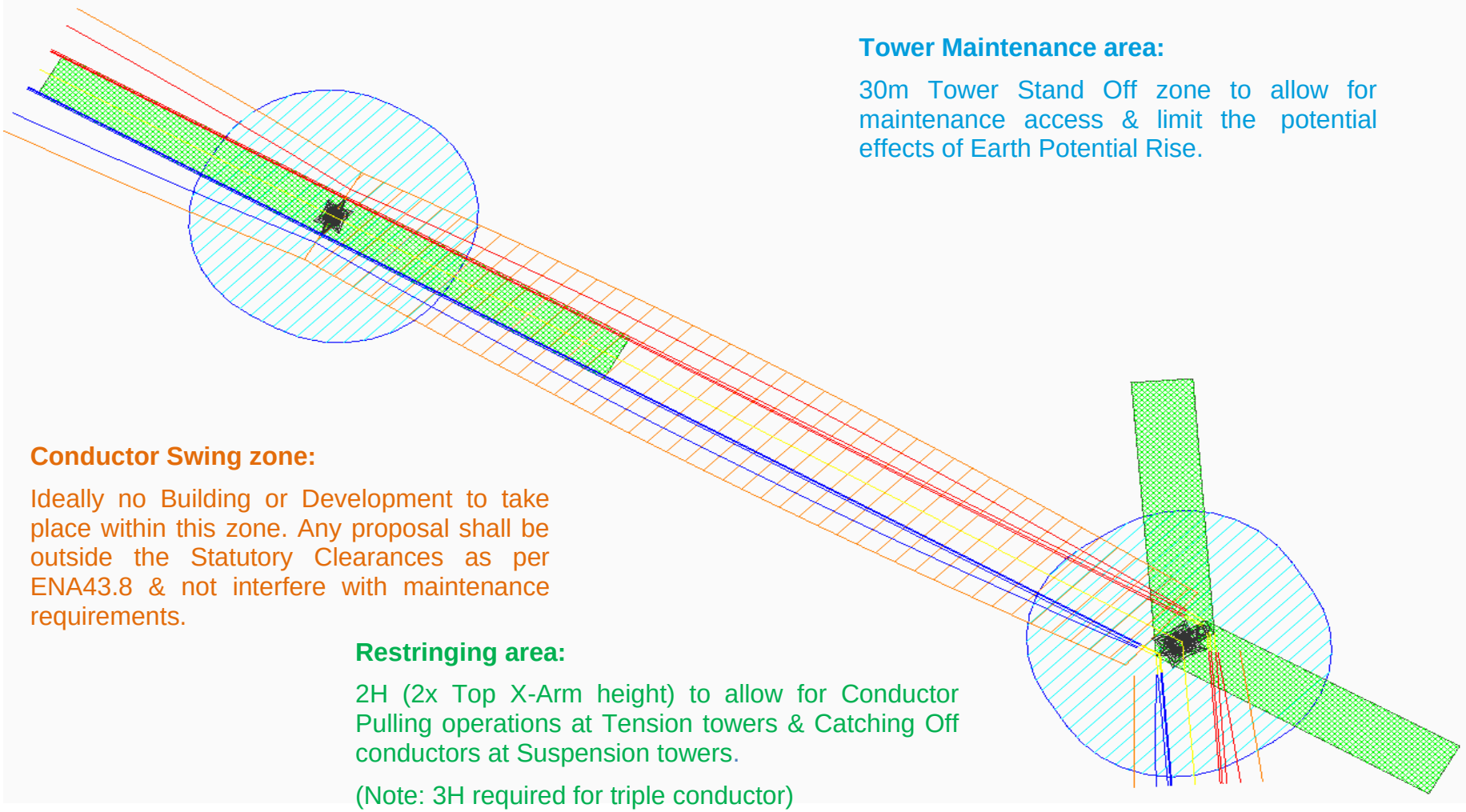
# 14 APPENDIX A

## OHL Profile Drawing Guide



# 15 APPENDIX B

## OHL Tower Stand Off & Reconductoring Area



**Tower Maintenance area:**

30m Tower Stand Off zone to allow for maintenance access & limit the potential effects of Earth Potential Rise.

**Conductor Swing zone:**

Ideally no Building or Development to take place within this zone. Any proposal shall be outside the Statutory Clearances as per ENA43.8 & not interfere with maintenance requirements.

**Restringing area:**

2H (2x Top X-Arm height) to allow for Conductor Pulling operations at Tension towers & Catching Off conductors at Suspension towers.

(Note: 3H required for triple conductor)

**Patten, Jack**

**From:** Alice Lawman [redacted]
**Sent:** 23 December 2024 13:59
**To:** Kingsway Solar Farm
**Subject:** EN010165 - Kingsway Solar Farm - National Highways EIA Scoping Consultation Response

**Follow Up Flag:** Follow up
**Flag Status:** Flagged

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## National Highways Scoping Opinion Consultation Response

National Highways welcomes the opportunity to respond to the consultation for a Scoping Opinion for the application for Development Consent for the Kingsway Solar Farm project.

On behalf of the Secretary of State for Transport, National Highways is responsible for managing and operating a safe and efficient Strategic Road Network (SRN) under the provisions of the Infrastructure Act 2015 and is the highway authority for the Strategic Road Network (SRN). The Department for Transport (DfT) Circular 01/2022 (Strategic road network and the delivery of sustainable development) sets out how National Highways will work with developers to ensure that specific tests are met when promoting a scheme. This includes ensuring the transport impact is understood, any mitigation (or other infrastructure) is designed in accordance with the relevant standards and that environmental impacts are appraised and mitigated accordingly. In addition, National Highways are responsible for ensuring the SRN serves its purpose as a part of a national system for through traffic in accordance with Section 10 of the Highways Act 1980, and to satisfy the reasonable requirements of road safety.

National Highways have reviewed the Scoping Reports and would require the following information to be included within the Environmental Statement:

- a vision as per the Circular 01/2022,
- outline relevant National and Local Policies;
- summarise existing baseline conditions;
- provide details of the Proposed Project;
- sets out the distribution of the construction and operational traffic;
- details the construction and operational trip generation;
- identify any necessary mitigation;
- assesses the impact of local committed developments;
- Carryout a cumulative assessment for the other NSIPs and committed development that are coming through around the project area; and
- summarises the findings and provide an overall conclusion.

National Highways suggest the following documents are referenced within the policy review for the project:

- Relevant National Policy Statements;
- National Planning Policy Framework (NPPF) (2023);
- Department for Transport Planning Policy Paper (DfT Circular 01/2022); and
- National Highways ‘The Strategic Road Network: Planning for the Future Guide’ (2015).

In addition to the above, National Highways have the following comments to make.

National Highways consider AIL's would need to be scoped in and considered at EIA stage. National Highways would advise that the Applicant directly discusses any matters pertaining to AIL movements with the National Highways Abnormal Indivisible Loads team (AbnormalIndivisibleLoadsTeam@nationalhighways.co.uk). Increased congestion and increased journey times/distance due to road closures or diversions for abnormal load access on the receptor 'Road user' would need to be scoped in due to the cumulative impact of other developments on the SRN.

National Highways advises consideration of any committed development and their cumulative impact within the project area are outlined within the Environmental Statement and Transport Assessment.

National Highways agree with the inclusion of SRN junctions within the Study Area. Further to this, we request the Applicant to provides information on the trip distribution, providing flow diagrams which include the junctions with the SRN in the vicinity of the proposed development. If the proposed development proposes to generate an increase of 30 two-way movements or more on any junctions on the Strategic Road Network within a peak period (AM or PM), we expect a capacity assessment to be undertaken to assess the impact of the proposed trips on the affected junctions and provide mitigations, if required. Where a junction capacity assessment could potentially be required, and we ask that National Highways are consulted early during the TA scoping process to ensure impacts to the SRN (and LRN) are appropriately assessed. This will enable us to determine the severity of traffic from this development on the operation and safety of the SRN.

In accordance with paragraph 70 of the 01/2022 Circular, we recommend that the Development Consent Order suite of documents includes a Glint and Glare Assessment, or similar considering the perspective of road users of the A47 to ensure road safety. For clarity, Paragraph 70 of the circular reads as follows: '*Some developments, notably solar farms, wind turbines and those with expansive glass facades, have the potential to create glint and glare which can be a distraction for drivers. Where these developments would be visible from the SRN, promoters must provide an appropriate assessment of the intensity of solar reflection likely to be produced, which satisfies the company that safety on the SRN is not compromised.'*

National Highways trusts its response provides clarification of its concerns and identify other matters which National Highways considers need to be addressed at this stage of the project. However, if you have any questions or comments regarding the contents of the letter then please do not hesitate to contact me on the details provided. National Highways looks forward to continuing positive engagement with Kingsway Solar Farm Limited Project Team as the project progresses.

Kind regards

**Alice Lawman** MRTPI

**Spatial Planner**
Operations (East) | National Highways
Woodlands | Manton Lane | Bedford | MK41 7LW
**Mobile**: +44 (0)[redacted]
Web: www.nationalhighways.co.uk

Please note I will be on Annual Leave between **Wednesday 22nd January and Monday 17th February 2025**. For any issues arising during this time, please email PlanningEE@nationalhighways.co.uk.

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***National Highways Limited | General enquiries: 0300 123 5000 |National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF*** | https://nationalhighways.co.uk | info@nationalhighways.co.uk

*Registered in England and Wales no 9346363 | Registered Office: Bridge House, 1 Walnut Tree Close, Guildford, Surrey GU1 4LZ*

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## Patten, Jack

**From:** NATS Safeguarding <NATSSafeguarding@nats.co.uk>
**Sent:** 17 December 2024 15:44
**To:** Kingsway Solar Farm
**Subject:** RE: EN010165 - Kingsway Solar Farm - EIA Scoping Consultation and Notification [SG38593]

**Follow Up Flag:** Follow up
**Flag Status:** Flagged

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Our Ref: SG38593

Dear Sir/Madam

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully

NATS Safeguarding

E: natssafeguarding@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk

NATS Internal

**From:** Kingsway Solar Farm <SM-KingswaySolar@planninginspectorate.gov.uk>
**Sent:** Tuesday, December 17, 2024 10:19 AM
**Subject:** EN010165 - Kingsway Solar Farm - EIA Scoping Consultation and Notification

Your attachments have been security checked by Mimecast Attachment Protection. Files where no threat or malware was detected are attached.

Dear Sir/Madam,

Please see attached correspondence on the proposed Kingsway Solar Farm.

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **14 January 2025**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards

Jack Patten

The Planning Inspectorate

**Jack Patten** (He/Him)
EIA Advisor
The Planning Inspectorate

@PINSgov The Planning Inspectorate planninginspectorate.gov.uk

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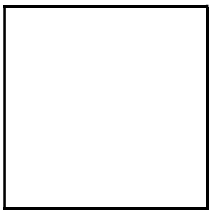

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Date: 14 January 2025
Our ref: 496657
Your ref: EN010165

KingwaySolar@planninginspectorate.gov.uk

**BY EMAIL ONLY**

Consultations
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 900

Dear Deb Glassop,

**Environmental Impact Assessment Scoping Consultation under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulation 11**

**Proposal: EIA Scoping Consultation for Kingsway Solar Farm. Cambridgeshire**
**Location: Kingsway Solar Farm**

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 17 December 2024, received on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

A robust assessment of environmental impacts and opportunities, based on relevant and up to date environmental information, should be undertaken prior to an application for a Development Consent Order (DCO). Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development.

Detailed advice on scoping the Environmental Statement is available in the attached Annex.

For any further advice on this consultation please contact the case officer Jessica James and copy to consultations@naturalengland.org.uk.

Yours sincerely

Jessica James
Senior Advisor for Nationally Significant Infrastructure Projects

**Annex A – Natural England's Advice on EIA Scoping**

**General principles**

a. Regulation 11 of the Infrastructure Planning Regulations 2017 - (The EIA Regulations) sets out the information that should be included in an Environmental Statement (ES) to assess impacts on the natural environment. This includes:
b.
c. A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases
d. Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc.) resulting from the operation of the proposed development
e. An assessment of alternatives and clear reasoning as to why the preferred option has been chosen
f. A description of the aspects of the environment likely to be significantly affected by the development including biodiversity (for example fauna and flora), land, including land take, soil, water, air, climate (for example greenhouse gas emissions, impacts relevant to adaptation, cultural heritage and landscape and the interrelationship between the above factors
g. A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium, and long term, permanent and temporary, positive, and negative effects. Effects should relate to the existence of the development, the use of natural resources (in particular land, soil, water and biodiversity) and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment
h. A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment
i. A non-technical summary of the information
j. An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information
k.
l. Further guidance is set out in Planning Practice Guidance on environmental assessment and natural environment.

**Cumulative and in-combination effects**
The ES should fully consider the implications of the whole development proposal. This should include an assessment of all supporting infrastructure.

An impact assessment should identify, describe, and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment (subject to available information):

a. existing completed projects;
b. approved but uncompleted projects;
c. ongoing activities;
d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

**Environmental data**

Natural England is required to make available information it holds where requested to do so. National datasets held by Natural England are available at http://www.naturalengland.org.uk/publications/data/default.aspx.

Detailed information on the natural environment is available at www.magic.gov.uk. This includes Marine Conservation Zone GIS shapefiles.

Natural England's SSSI Impact Risk Zones are a GIS dataset which can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the Natural England Open Data Geoportal.

Natural England does not hold local information on local sites, local landscape character, priority habitats and species or protected species. Local environmental data should be obtained from the appropriate local bodies. This may include the local environmental records centre, the local Wildlife Trust, local geo-conservation group or other recording society.

**Biodiversity and geodiversity**

The assessment will need to include potential impacts of the proposal upon sites and features of nature conservation interest as well as opportunities for nature recovery through biodiversity net gain (BNG). There might also be strategic approaches to take into account.

Ecological Impact Assessment (EcIA) is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EcIA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal. Guidelines and an EcIA checklist have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).

Many public authorities e.g. National Highways and National Grid have biodiversity duties including taking opportunities for habitat restoration or enhancement. They might have Key Performance Indicators (KPIs) to adhere to via Government policy, or have agreed approaches to BNG. Further information around general duties is available here.

Remember to refer to the relevant sector specific information within National Policy Statements here and our own sector specific guidance on the SD Toolkit.

**Designated nature conservation sites**

**International and European sites**

The development site is within or may impact on the following **European/internationally designated nature conservation site(s):** Devils Dyke Special Area of Conservation (SAC), Fenland SAC, Wicken Fen Ramsar and Chippenham Fen Ramsar.

The ES should thoroughly assess the potential for the proposal to affect internationally designated sites of nature conservation importance / European sites, including marine sites where relevant. This includes Special Protection Areas (SPA), Special Areas of Conservation (SAC), listed Ramsar sites, candidate SAC and proposed SPA.

Article 6 (3) of the Habitats Directive requires an appropriate assessment where a plan or project is likely to have a significant effect upon a European Site, either individually or in combination with other plans or projects.

European site conservation objectives are available at http://publications.naturalengland.org.uk/category/6490068894089216.

Evidence Plans are a useful mechanism NSIP applicants can use to agree what information should be provided to the Planning Inspectorate and Natural England when undertaking Habitats Regulations Assessment (HRA). Agreeing the evidence-needs of the project early prior to applying for Development Consent will help reduce delays in the process. More information on Evidence Plans is available here.

You should also consider where applicable our advice on the environmental considerations and use of data and evidence to support offshore wind and cable projects in English waters – see: Environmental considerations for offshore wind and cable projects - Home (sharepoint.com). This includes Natural England and Joint Nature Conservation Committee (JNCC)'s shared advice on 'Nature conservation considerations and environmental best practice for subsea cables in English inshore and UK offshore waters'. The outputs of Natural England's project 'Offshore Wind Marine Environmental Assessments: Best Practice Advice for Evidence and Data Standards' are also provided.

Natural England's Impact Risk Zones incorporate internationally designated sites and features and can be used to help identify the potential for the development to impact on a European Site. The dataset and user guidance can be accessed from the Natural England Open Data Geoportal.

You can access this information through NE Maps.

**Nationally designated sites**

**Sites of Special Scientific Interest**

The development site is within or may impact on the following **Site of Special Scientific Interest:** Fleam Dyke SSSI, Devil's Dyke SSSI, Newmarket Heath SSSI, Roman Road SSSI, Balsham wood SSSI, Fulbourn Fen SSSI, Great Wilbraham Common SSSI and Wicken Fen SSSI.

The ES should include a full assessment of the direct and indirect effects of the development on the features of special interest within the SSSI's and identify appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects.

Sites of Special Scientific Interest are protected under the Wildlife and Countryside Act 1981 (as amended). Further information on the SSSI and its special interest features can be found at www.magic.gov.uk.

Natural England's SSSI Impact Risk Zones can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the Natural England Open Data Geoportal.

**Regionally and Locally Important Sites**

The ES should consider any impacts upon local wildlife and geological sites, including local nature reserves. Local Sites are identified by the local wildlife trust, geoconservation group or other local group and protected under the NPPF (paragraph 180 and 181). The ES should set out proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks. Contact the relevant local body for further information.

**Protected species**

The conservation of species protected under the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017 is explained in Part IV and Annex A of Government Circular 06/2005 Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System.

Applicants should check to see if a mitigation licence is required using Natural England guidance on licensing Natural England wildlife licences. Applicants can also make use of Natural England's charged service Pre Submission Screening Service for a review of a draft wildlife licence application. Natural England then reviews a full draft licence application to issue a Letter of No Impediment (LONI) which explains that based on the information reviewed to date, that it sees no impediment to a licence being granted in the future should the DCO be issued. This is done to give the Planning Inspectorate confidence to make a recommendation to the relevant Secretary of State in granting a DCO. See Advice Note Eleven, Annex C – Natural England and the Planning Inspectorate | National Infrastructure Planning for details of the LONI process.

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law. Records of protected species should be obtained from appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area.

The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants.

Natural England has adopted standing advice for protected species, which includes guidance on survey and mitigation measures. A separate protected species licence from Natural England or Defra may also be required.

**District Level Licensing for great crested newts**

Where strategic approaches such as DLL for GCN are used, a Letter of No Impediment (LONI) will not be required. Instead, the developer will need to provide evidence to the Examining Authority (ExA) on how and where this approach has been used in relation to the proposal, which must include a counter-signed Impact Assessment and Conservation Payment Certificate (IACPC) from Natural England, or a similar approval from an alternative DLL provider.

The DLL approach is underpinned by a strategic area assessment which includes the identification of risk zones, strategic opportunity area maps and a mechanism to ensure adequate compensation is provided regardless of the level of impact. In addition, Natural England (or an alternative DLL provider) will undertake an impact assessment, the outcome of which will be documented in the IACPC (or equivalent).
If no GCN surveys have been undertaken, Natural England's risk zone modelling may be relied upon. During the impact assessment, Natural England will inform the applicant whether their scheme is within one of the amber risk zones and therefore whether the Proposed Development is likely to have a significant effect on GCN.

The IACPC will also provide additional detail including information on the Proposed Development's impact on GCN and the appropriate compensation required.

By demonstrating that the DLL scheme for GCN will be used, consideration of GCN in the ES can be restricted to cross-referring to the Natural England (or alternative provider) IACPC as a justification as to why significant effects on GCN populations as a result of the Proposed Development would be avoided.

**Priority Habitats and Species**

Priority Habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Lists of priority habitats and species can be found here. Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. Sites can be checked against the (draft) national Open Mosaic Habitat (OMH) inventory published by Natural England and freely available to download. Further information is also available here.

An appropriate level habitat survey should be carried out on the site, to identify any important habitats present. In addition, ornithological, botanical, and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present.

The ES should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys)
- Additional surveys carried out as part of this proposal
- The habitats and species present
- The status of these habitats and species (e.g. whether priority species or habitat)
- The direct and indirect effects of the development upon those habitats and species
- Full details of any mitigation or compensation measures
- Opportunities for biodiversity net gain or other environmental enhancement

**Ancient Woodland, ancient and veteran trees**

The ES should assess the impacts of the proposal on the ancient woodland and any ancient and veteran trees, and the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement.

Ancient woodland is an irreplaceable habitat of great importance for its wildlife, its history, and the contribution it makes to our diverse landscapes. Paragraph 186 of the National Planning Policy Framework (NPPF) sets out the highest level of protection for irreplaceable habitats and development should be refused unless there are wholly exceptional reasons, and a suitable compensation strategy exists.
Natural England maintains the Ancient Woodland Inventory which can help identify ancient woodland. The wood pasture and parkland inventory sets out information on wood pasture and parkland.

The ancient tree inventory provides information on the location of ancient and veteran trees.

Natural England and the Forestry Commission have prepared standing advice on ancient woodland, ancient and veteran trees.

**Biodiversity net gain**

The Environment Act 2021 includes NSIPs in the requirement for BNG, with the biodiversity gain objective for NSIPs defined as at least a 10% increase in the pre-development biodiversity value of the on-site habitat. It is the intention that BNG should apply to all terrestrial NSIPs accepted for examination from November 2025. This includes the intertidal zone but excludes the subtidal zone (an approach to marine net gain is being developed but this will not form part of mandatory BNG). Projects that span both offshore and onshore will be subject to BNG requirements for the onshore components only. Some organisations have made public BNG commitments, and some projects are already delivering BNG on a voluntary basis.

**Landscape**

**Nationally designated landscapes**

**Landscape and visual impacts**

Public bodies have a duty to have regard to the statutory purposes of designation in carrying out their functions (under (section 11 A (2) of the National Parks and Access to the Countryside Act 1949 (as amended) for National Parks and S85 of the Countryside and Rights of Way Act, 2000 for AONBs). Planning Practice Guidance confirms that this duty also applies to proposals outside the designated area but impacting on its natural beauty.

The National Policy Statement for the relevant sector might have relevant protections.

Consideration should be given to the direct and indirect effects on this designated landscape and in particular the effect upon its purpose for designation. The management plan for the designated landscape may also have relevant information that should be considered in the EIA.

The environmental assessment should refer to the relevant National Character Areas. Character area profiles set out descriptions of each landscape area and statements of environmental opportunity.

The EIA should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies. We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.

A landscape and visual impact assessment should also be carried out for the proposed development and surrounding area. Natural England recommends use of the methodology set out in *Guidelines for Landscape and Visual Impact Assessment 2013 (*(3rd edition) produced by the Landscape Institute and the Institute of Environmental Assessment and Management. For National Parks and AONBs, we advise that the assessment also includes effects on the ‘special qualities’ of the designated landscape, as set out in the statutory

management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. This should include an assessment of the impacts of other proposals currently at scoping stage.

To ensure high quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the proposed development should reflect local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides as well as guidance in the National Design Guide and National Model Design Code. The ES should set out the measures to be taken to ensure the development will deliver high standards of design and green infrastructure. It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit.

The National Infrastructure Commission has also produced Design Principles Design Principles for National Infrastructure - NIC endorsed by Government in the National Infrastructure Strategy.

**Connecting people with nature**

The ES should consider the potential impacts on the Click here to enter text. National Trail. The National Trails website www.nationaltrail.co.uk provides further information.

The ES should consider potential impacts on access land, common land, public rights of way and, where appropriate, the England Coast Path and coastal access routes and coastal margin in the vicinity of the development, in line with NPPF paragraph 104 and there will be reference in the relevant National Policy Statement. It should assess the scope to mitigate for any adverse impacts. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

Measures to help people to better access the countryside for quiet enjoyment and opportunities to connect with nature should be considered. Such measures could include reinstating existing footpaths or the creation of new footpaths, cycleways, and bridleways. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Access to nature within the development site should also be considered, including the role that natural links have in connecting habitats and providing potential pathways for movements of species.

Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

**Soils and agricultural land quality**

Soils are a valuable, finite natural resource and should also be considered for the ecosystem services they provide, including for food production, water storage and flood mitigation, as a carbon store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil resources are protected and sustainably managed. Impacts from the development on soils and best and most versatile (BMV) agricultural land should be considered in line with paragraphs 180 and 181 of the NPPF. Further guidance is set out in the Natural England Guide to assessing development proposals on agricultural land.

As set out in paragraph 217 of the NPPF, new sites or extensions to sites for peat extraction should not be granted planning permission.

The following issues should be considered and, where appropriate, included as part of the Environmental Statement (ES):

- The degree to which soils would be disturbed or damaged as part of the development

The extent to which agricultural land would be disturbed or lost as part of this development, including whether any best and most versatile (BMV) agricultural land would be impacted.

This may require a detailed Agricultural Land Classification (ALC) survey if one is not already available. For information on the availability of existing ALC information see www.magic.gov.uk.

- Where an ALC and soil survey of the land is required, this should normally be at a detailed level, e.g. one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres. The survey data can inform suitable soil handling methods and appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space).
- The ES should set out details of how any adverse impacts on BMV agricultural land can be minimised through site design/masterplan.
- The ES should set out details of how any adverse impacts on soils can be avoided or minimised and demonstrate how soils will be sustainably used and managed, including consideration in site design and master planning, and areas for green infrastructure or biodiversity net gain. The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise off-site impacts.

Further information is available in the Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites and
The British Society of Soil Science Guidance Note Benefitting from Soil Management in Development and Construction.

**Air quality**

Air quality in the UK has improved over recent decades but air pollution remains a significant issue. For example, approximately 85% of protected nature conservation sites are currently in exceedance of nitrogen levels where harm is expected (critical load) and approximately 87% of sites exceed the level of ammonia where harm is expected for lower plants (critical level of 1µg) [1].A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The Government's Clean Air Strategy also has a number of targets to reduce emissions including to reduce damaging deposition of reactive forms of nitrogen by 17% over England's protected priority sensitive habitats by 2030, to reduce emissions of ammonia against the 2005 baseline by 16% by 2030 and to reduce emissions of NOx and $SO_2$ against a 2005 baseline of 73% and 88% respectively by 2030. Shared Nitrogen Action Plans (SNAPs) have also been identified as a tool to reduce environmental damage from air pollution.

The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly, or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The ES should take account of the risks of air pollution and how these can be managed or reduced. This should

include taking account of any strategic solutions or SNAPs, which may be being developed or implemented to mitigate the impacts on air quality. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk).

Information on air pollution modelling, screening and assessment can be found on the following websites:

- SCAIL Combustion and SCAIL Agriculture - http://www.scail.ceh.ac.uk/
- Ammonia assessment for agricultural development https://www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit
- Environment Agency Screening Tool for industrial emissions https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit
- Defra Local Air Quality Management Area Tool (Industrial Emission Screening Tool) – England http://www.airqualityengland.co.uk/laqm

**Water quality**

NSIPs can occur in areas where strategic solutions are being determined for water pollution issues and they may not have been factored into the local planning system as they are delivered through National Policy Statements.

The planning system plays a key role in determining the location of developments which may give rise to water pollution, and hence planning decisions can have a significant impact on water quality, and land. The assessment should take account of the risks of water pollution and how these can be managed or reduced. A number of water dependent protected nature conservation sites have been identified as failing condition due to elevated nutrient levels and nutrient neutrality is consequently required to enable development to proceed without causing further damage to these sites. The ES needs to take account of any strategic solutions for nutrient neutrality or Diffuse Water Pollution Plans, which may be being developed or implemented to mitigate and address the impacts of elevated nutrient levels.

North Herts Council

www.north-herts.gov.uk

Deb Glassop

Our Ref : 24/02857/NHC
Contact : Sam Dicocco
Direct Line : [redacted]
Email : [redacted]
Date : 8th January 2025

Dear Sir / Madam,

**NHC Consultee : Order granting Development Consent for Kingsway Solar Farm (the Proposed Development)**
**Kingsway Solar Farm**

The documents contained within the link in the letter for Kingsway Solar Farm Scoping Opinion in respect the forthcoming request for a Development Consent Order has been reviewed.

The Scoping Opinion does not identify North Hertfordshire District Council (NHDC) in any consultation exercise in the creation of the Environmental Statement for any of the matters currently scoped in. NHDC are in agreement with the extent of consultation.

Therefore, NHDC provide no comment on the Scoping Opinion consulted upon.

Yours faithfully

[redacted]

Shaun Greaves
Development and Conservation Manager

The Council's Privacy Notice is available on our website: https://www.north-herts.gov.uk/home/council-data-and-performance/data-protection/information-management-gdpr

**Telephone:** 01733 453410 (9am - 1pm Mon, Wed, Fri)
**Email:** planningcontrol@peterborough.gov.uk
**Case Officer:** Mr Asif Ali
**Our Ref:** 24/01030/CONSUL
**Your Ref:** EN010165

PETERBOROUGH CITY COUNCIL

Planning Services

Sand Martin House
Bittern Way
Fletton Quays
Peterborough
PE2 8TY

**Peterborough Direct:** [redacted]

Ms Deb Glassop
Planning Inspectorate Secretary of State
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN

14 January 2025

Dear Ms Glassop

**Planning enquiry**

Proposal: EIA Scoping Consultation and Notification

Site address: Kingsway Solar Farm

Further to your enquiry received on 17 December 2024, in respect of the above, the Local Planning Authority makes the following comments:

Peterborough City Council can confirm that we have no comments to make.

I trust that the above advice is of use however should you have any further queries, please do not hesitate to contact me on the details shown at the top of this letter.

Yours sincerely

Mr Asif Ali
Senior Development Management Officer

REACH

PARISH COUNCIL

29 Great Lane
Reach
Cambridgeshire
CB25 0JF
8 January 2025

Dear Deb Glassop,

**EN010165 Proposed Solar Farm and Battery Storage Scheme**
**Cambridgeshire**
**Kingsway Solar's Scoping Report**

Your letter and attachments of 17 December 2024 refer.

Reach Parish Council has reviewed Kingsway Solar's Environmental Impact Analysis Scoping Report (SR) and listened to the views of concerned members of the community we represent. In its current form, we consider the SR an inadequate basis for producing an Environmental Statement (ES) and thereafter an Environmental Impact Analysis (EIA).

Firstly, the SR has significant omissions. The SR makes no reference to Reach's Neighbourhood Plan (NP) which was made in February 2024 following a turnout of almost 60 per cent of the electorate. This extremely high level of engagement demonstrates our community's commitment to preserving and enhancing our neighbourhood and its unique landscape.

A copy of the NP is attached to this letter. It details those things that make Reach a special place to live, and about which residents are very clear they wish to protect. In the context of Kingsway Solar's proposal, Policy RCH 6 is most pertinent:

*As appropriate to their scale, nature and location development proposals should:*

i. *have regard to, and conserve or enhance, the rural character and the setting of the village as identified in the Reach Landscape Appraisal;*

ii. *not result in the erosion of the settlement gaps identified on the Policies Map; ensure that there is no unacceptable impact on the key features of important views identified on the*
*Policies Map and described in the Appraisal of Important Views; and*
*respond positively to the Landscape Appraisal Development Guidelines, identified in Table 1 of the Neighbourhood Plan.*

Elsewhere the Reach NP articulates the key landscape features of our neighbourhood that we believe are worthy of protection, noting *'there are significant areas of national archaeological, historical, and environmental interest within its (i.e., the neighbourhood of Reach's) bounds. The village's form strikingly reflects its rich past and its relationship with the landscape. It is remarkably unchanged for several centuries. It is defined by an artificial spine of the Devils Dyke - Fair*

*Green - The Hythe and Reach Lode that runs through the entirety of the neighbourhood and reflects land use going back to at least the Saxon Period. The Devils Dyke is the largest Anglo-Saxon earthworks in the country.'*

It follows that Reach PC expects Kingsway's ES and subsequent EIA to meet the requirements of RCH6 of the Reach NP wherever its proposal impacts on the neighbourhood of Reach. We also expect the ES to acknowledge and accommodate the wider sentiments of residents of Reach as articulated in the NP.

The SR omits reference to the following assets of the village:

- community orchard, native woodland, and equestrian arena at the 24 Acres
- Village Hall
- Church

All could be adversely affected by this proposal.

The SR fails to list the National Trust (NT) as a consultee despite recognising that the land within the proposed connection corridors is hydrologically linked to Wicken Fen (4.2.7) and the lands of the Wider Wicken Vision (WWV) for which the NT is responsible and despite the potentially highly significant visual impact on some of this land were this proposal to be approved. For example, much of the proposed eastern connection corridor is visible from the NT Adventurer's Car Park, a key gateway into the WWV. Approximately two thirds of the neighbourhood of Reach lies within the WWV area.

On the specifics of what is in the SR, Reach PC's concerns focus on the visual impact, at a landscape scale, of the proposed construction of a 440kV overhead pylon and cable (OHL) to connect the proposed PV arrays to the national grid at a new substation, termed Burwell South, which we infer is needed primarily or solely because of Kingsway's proposal.

Kingsway's SR states that National Grid has yet to determine the exact location or footprint of the Burwell South substation. The SR offers no date on which this clarification will be made. It is possible that the new substation will be located closer to Reach than the existing substation which lies in the parish of Burwell. Wherever it is located, by dint of the layout and outlook of Reach, it is likely to have a profound visual impact on our community.

Rather than delineating a precise route for cabling connecting the PV arrays to the national grid, the SR offers two broad 'connection corridors' to mitigate uncertainty about the location the substation. The corridors are in places 3 km wide and together they occupy an area in excess of 40 square km. No field studies or initial visual impact assessments have been undertaken. However, as the SR acknowledges, the landscape and ecology within the corridors varies considerably. In these circumstances we are sceptical that a sufficiently forensic or granular examination of the impact of connecting the proposed scheme to the national grid could be produced on the basis of this SR (see elements of 6.2.2 for example). This is particularly important as the sentiments of the SR are to downplay the impact of an OHL on our neighbourhood and more widely. As a point of important detail on the parameters of a Visual Impact Assessment, we do not accept that the 3 km 'buffer' proposed by Kingsway (beyond which there would be limited impact) is acceptable given the flat and open landscape to the north and west of the proposed connection corridors.

In summary, we consider that such vagueness and uncertainty in respect of key elements of Kingsway's SR would lead to an EIA that is equally imprecise and inadequate for all parties. We therefore request that the EIA process is delayed until Kingsway is able to:

- clarify its preferred connection route and to narrow its width to enable a meaningful landscape impact assessment to be undertaken
- say exactly where connection to the national grid would be made
- outline the infrastructure required at the new substation to import the electricity into the national grid.

These requests will clearly require Kingsway to collaborate with National Grid to a greater extent than is evident at present. However we consider the exclusion of the environmental impact of a new substation at Burwell South required to accommodate the feed from Kingsway's proposal would be perverse if consideration of this proposed NSIP(s) is to be rigorous and comprehensive.

Finally, we note that Kingsway makes reference to the possibility of placing its connection underground (2.8.3). Whilst Kingsway's preference appears to be for an overhead connection, we advise that the Sunnica Solar Farm scheme (which is of similar scale and distance from a national grid connection to Kingsway's proposal) adopted underground connection to the national grid from the outset. This strongly suggests that an underground connection would be technically and financially feasible. We therefore request that an underground connection option is assessed in exactly the same way as OHL routes for the entirety of Kingsway Solar's chosen route.

We should be grateful for your acknowledgement of this letter, a copy of which goes to Charlotte Cane MP.

Yours sincerely,

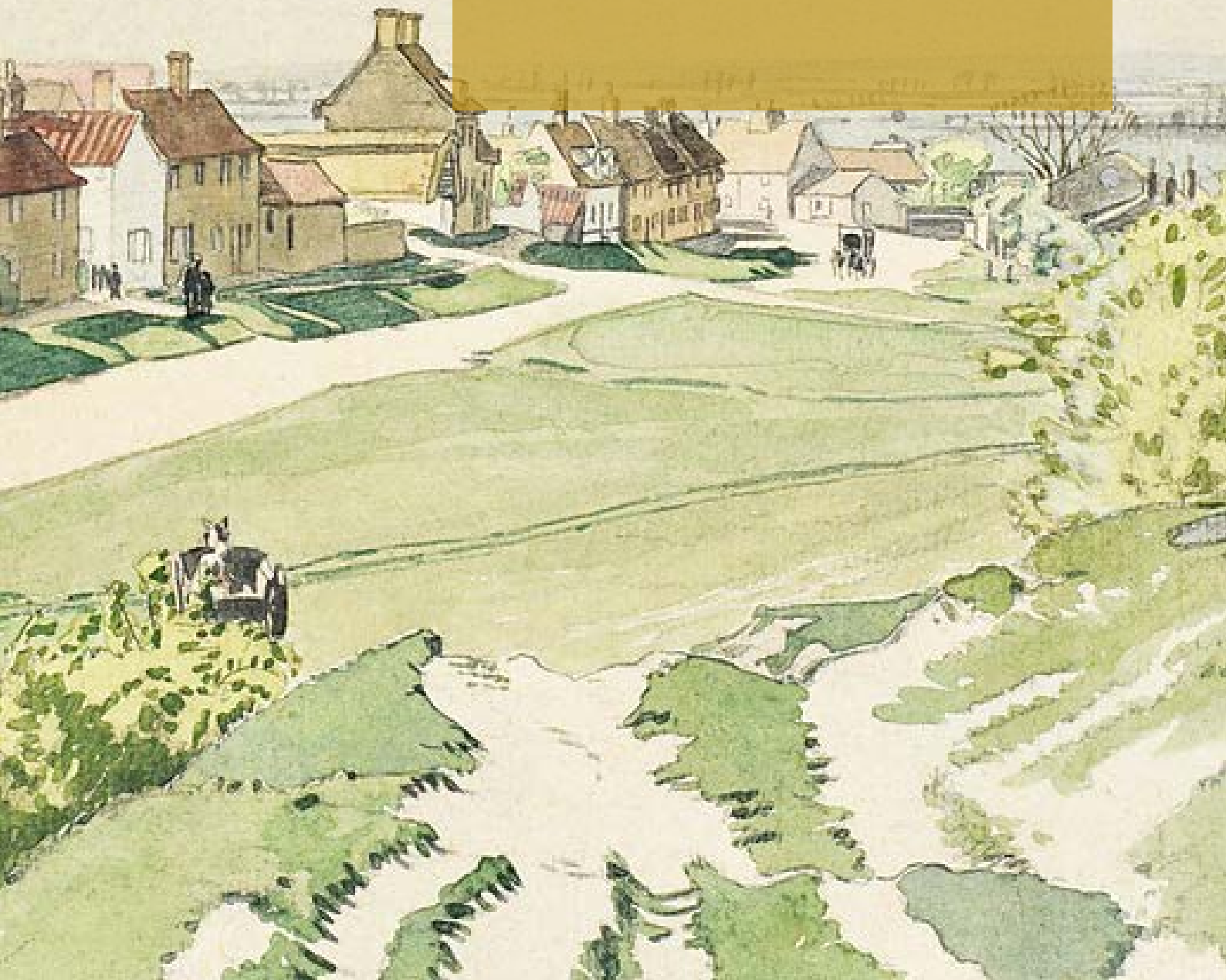
Susan Bailey

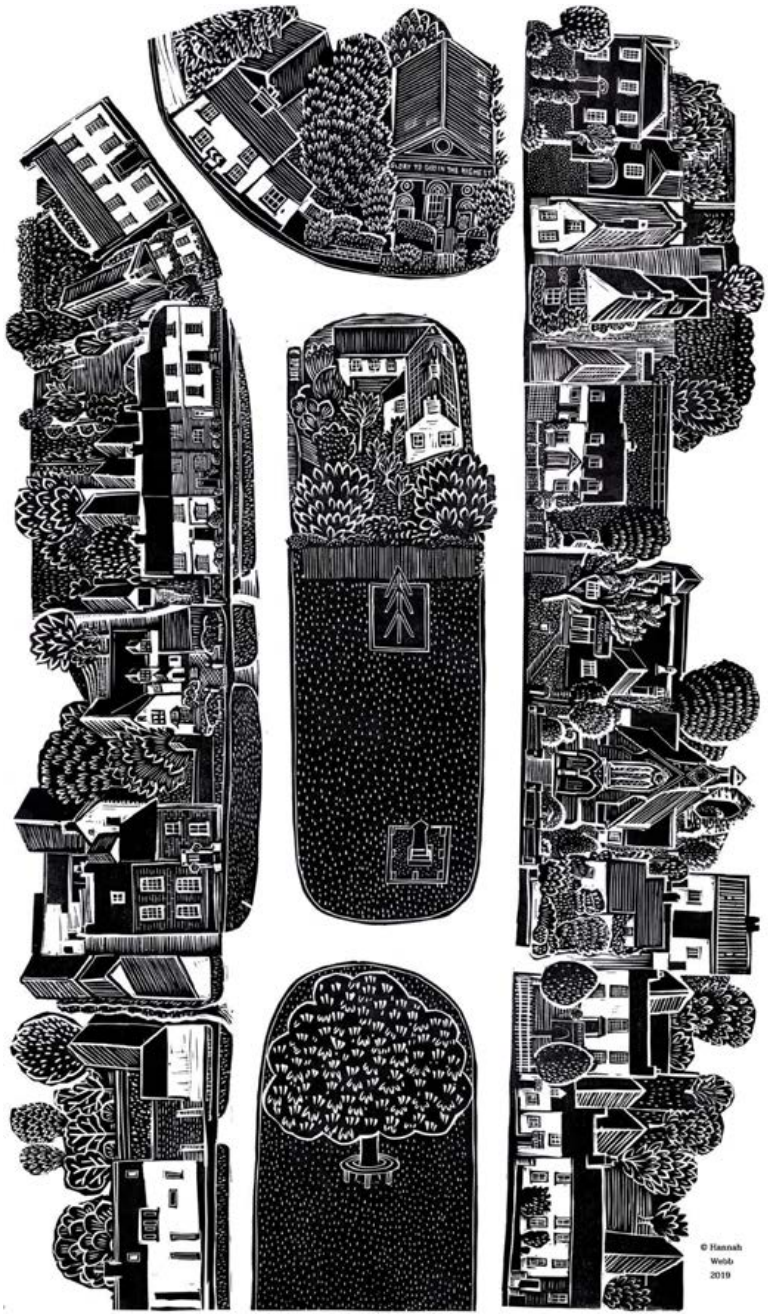
**Clerk to Reach Parish Counc**

# Reach Neighbourhood Plan

MADE VERSION

February 2024
Reach Parish Council






Thank you to Tim and Dafila Clutton-Brock for permission to use an image of a watercolour of Fair Green in 1918 to Hannah Webb for the lino-cut map of the village and to Rosanna Moseley-Gore for photographs of the neighbourhood.

Prepared by a Project Group of Parish Councillors and volunteers on behalf of Reach Parish Council and supported by Places4People Planning Consultancy.

PLACES 4 PEOPLE PLANNING CONSULTANCY P4P

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# 1. INTRODUCTION

1.1 The Localism Act 2011 introduced new rights and powers to allow local communities to prepare Neighbourhood Plans, which establish general planning policies for the development and use of land in the neighbourhood. These Plans, when properly "made", become part of the legal planning framework for the designated area.

1.2 A Neighbourhood Plan is, therefore, a community-led planning framework for guiding the future development, regeneration and conservation of an area. It is about the use and development of land and contains a vision statement, aims, planning policies, proposals for improving the area or providing new facilities, or allocation of key sites for specific kinds of development.

1.3 Parish councils are encouraged to produce their own Neighbourhood Plans enabling local people to have a say as to how their neighbourhood grows and develops. In a designated neighbourhood area, which contains all or part of the administrative area of a parish council, that council is responsible for the preparation of the Plan. Neighbourhood Plans cannot contradict the main government planning policies or the strategic policies in the Local Plan for the area. For example, they cannot propose less development than is planned for in the adopted Local Plan.

1.4 During 2018 there was a strong sense in the village that there was no local control. In January 2019 the Parish Council agreed to prepare a Neighbourhood Plan and established a Project Group to oversee its preparation. In February 2019 East Cambridgeshire District Council designated the whole parish as a "Neighbourhood Area", the area for which the Plan would apply and as illustrated in Map 1. Since the establishment of the project, the following key pieces of work have been accomplished:

- Residents' Survey
- Landscape Character Appraisal
- Design Guidance
- Assessment of Local Green Spaces
- Ecology Survey
- Identification of Buildings of Local Significance
- Appraisal of Important Views

1.5 This Neighbourhood Plan has been prepared by the Project Group. It focuses on local planning related matters and provides the parish of Reach with greater opportunities than ever before to influence change and development within our area, based upon a fair and democratic consultation process.

1.6 The Plan is structured to provide information about the Neighbourhood Plan process; the Village's distinct character, history and geography; Vision and Objectives; and the planning policies that will be used by the District Council when considering planning applications. The Plan covers the period to 2031 to be in alignment with the adopted Local Plan.

1.7 This Neighbourhood Plan represents the culmination of preparing and commissioning background reports and consulting with residents. It conforms with the strategic planning policies of the East Cambridgeshire Local Plan 2015 (as amended 2023), the requirements of the National Planning Policy Framework and, most importantly, reflects the aspirations of the residents of Reach.

### Purpose and Scope of Plan

1.8 The Neighbourhood Plan has been prepared to provide a detailed layer of local policies which reflect the specific context of Reach, as well as providing up-to-date planning policies that reflect the current status of the East Cambridgeshire Local Plan. At important points during the preparation of the Plan, the wishes and opinions of the local community have been sought and are reflected in it. The Plan covers seven main topic areas as illustrated below.

1.9 These areas form the basis for the content of the Plan and the distinct chapters cover the policies and aspirations for each topic. Each chapter contains a reminder of the relevant objectives and a summary of the relevant evidence collected during the preparation of the Plan, culminating in planning policies and, where appropriate, community actions and projects. Community actions do not form part of the "statutory" Neighbourhood Plan but are included to identify other areas of improvement and change that residents have identified during the preparation of the Plan. The planning policies appear in boxes numbered RCH1, RCH2 etc, while separate boxes contain the non-statutory community actions, identified as CA1, CA2.

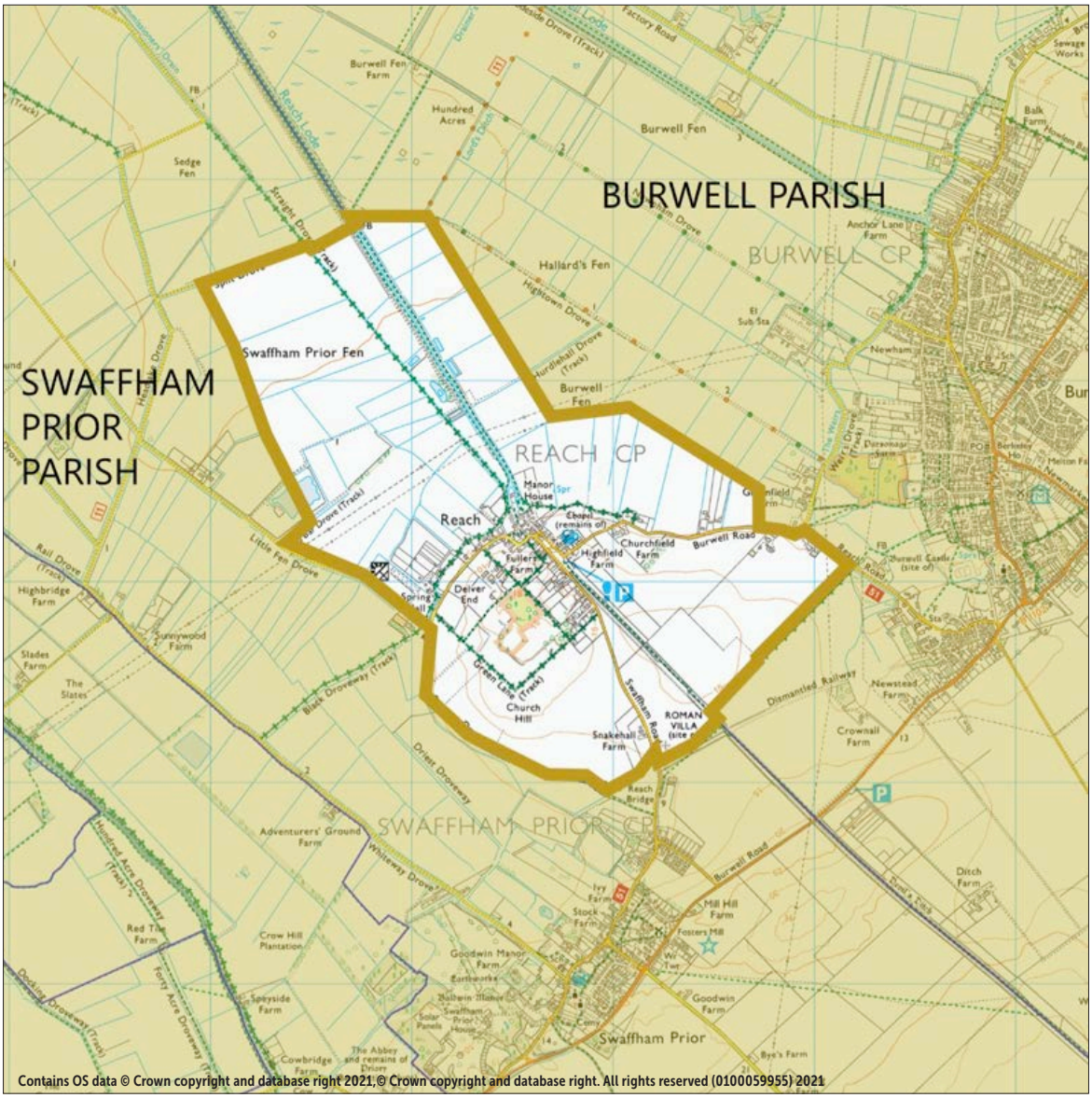
1.10 When considering planning applications, the District Council will use the Neighbourhood Plan policies relevant to the proposal, as well as those in the adopted Local Plan and the National Planning Policy Framework (NPPF). Occasionally the NPPF is updated and, in such circumstances, such changes will supersede the policies in the Neighbourhood Plan.

## How the Plan Has Been Prepared

1.11 The Neighbourhood Plan Regulations require a neighbourhood plan to:

- be appropriate, having regard to national planning policy;
- contribute to achieving sustainable development;
- be in general conformity with strategic policies in the development plan for the local area; and
- be compatible with EU obligations and Human Rights requirements.

1.12 The Neighbourhood Plan has been prepared in accordance with the requirements of the Government's Neighbourhood Planning Regulations and, in particular, has involved local community engagement to gather evidence for the content of the Plan.



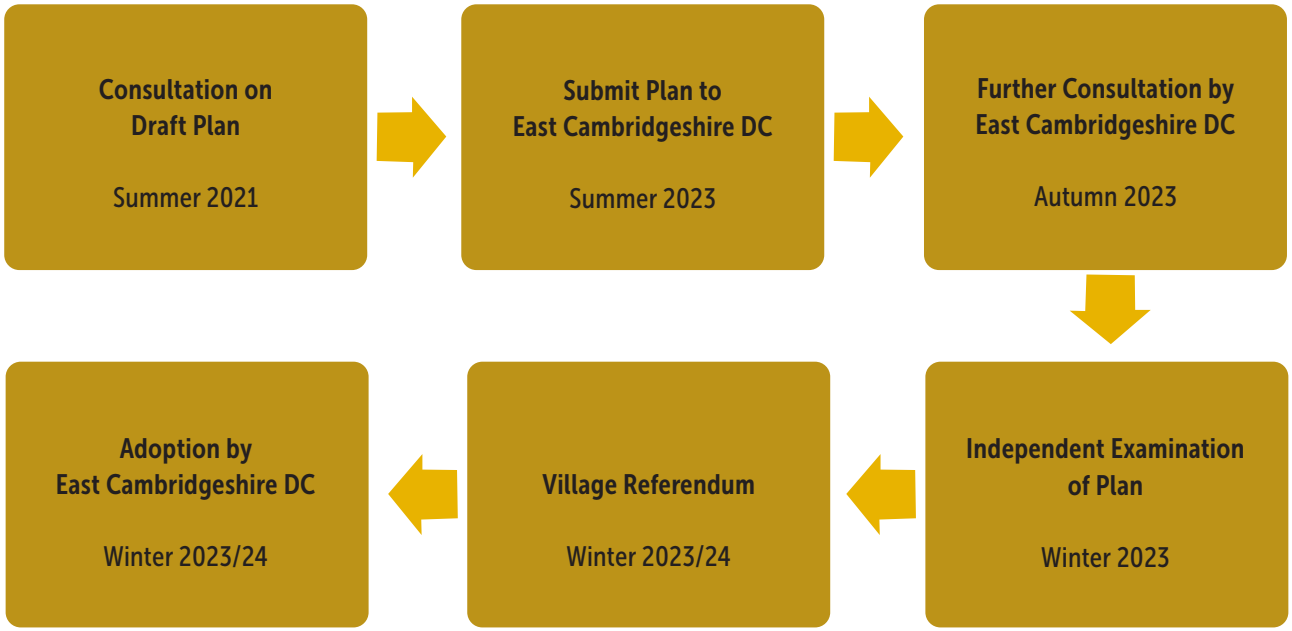

MAP 1: The Designated Neighbourhood Plan Area

1.13 Community consultation events have been held as follows:

- An information stall at Reach Fair in May 2019
- A launch event in Reach Village Hall in June 2019
- A village walkabout also in June 2019 led by a local history, archaeology, ecological, hydrology and geology experts resident in the village.
- Progress reports, including requests for feedback and information, in 'Within Reach' the parish magazine which is delivered bimonthly to every household in the village.
- A webpage (www.reach-village.co.uk/neighbourhood_plan.html) containing information about the NP Working Group and all evidence gathered in support of the Plan

All meetings of the NP Working Group (including those online) were open to the public and agendas circulated, via social media and a village email network, well in advance.

1.14 In June 2021 the Parish Council undertook the "Pre-Submission" consultation on the draft Neighbourhood Plan. Details of that are contained in the Neighbourhood Plan Consultation Statement that accompanied the Plan when it was submitted to East Cambridgeshire District Council. The Neighbourhood Plan was approved at a Parish Referendum in February 2024 and subsequently "made" (adopted) by East Cambridgeshire District Council on 20 February 2024. It is therefore used by the District Council when considering planning applications in the Parish.

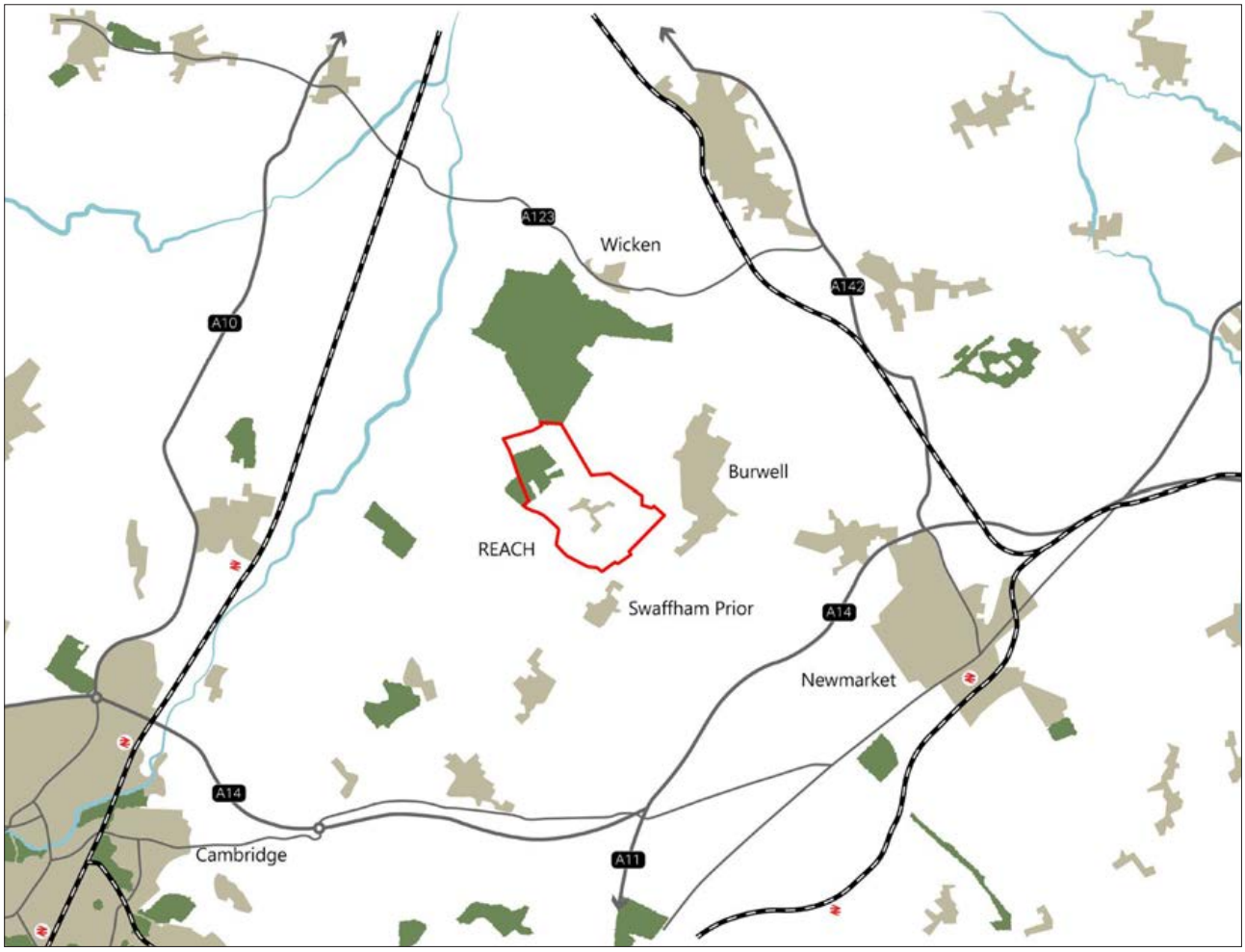


# 2 REACH PAST AND PRESENT

2.1 Reach is a small village in East Cambridgeshire. It sits 11 miles to the Northeast of Cambridge and 5 miles to the east of Newmarket, as illustrated on Map 2. Reach is a compact settlement lying on the fen edge. Virtually all the housing in the village has been built on low-lying chalk abutting the fen soils between 3 and 10 metres above sea level. Though limited in elevation, the choice of site was important in flood mitigation and shapes Reach's visual presence in the landscape.

### Reach is a unique settlement

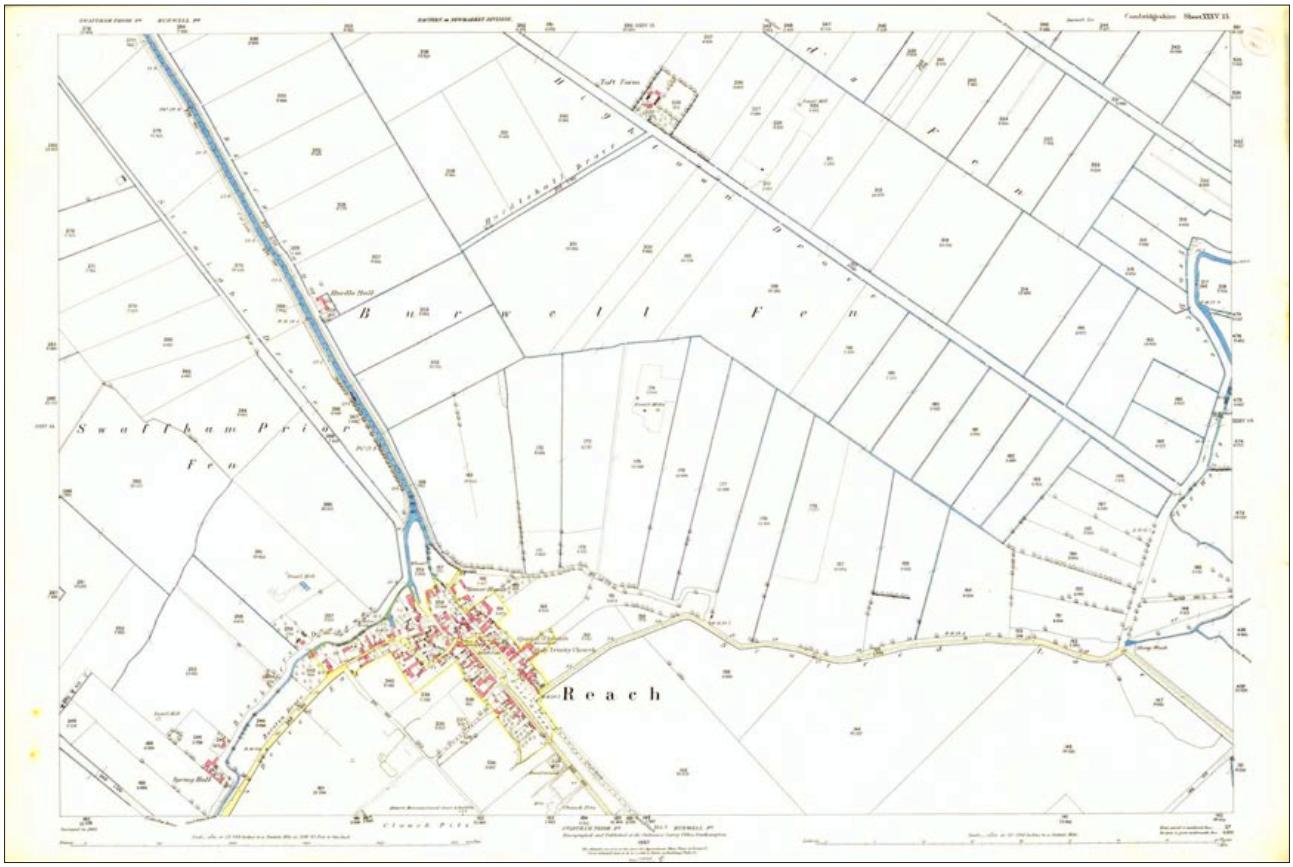
2.2 Reach is a particularly small neighbourhood covering just 422 hectares (1.75 square miles). However, there are significant areas of national archaeological, historical and environmental interest within its bounds. The village's form strikingly reflects its rich past and its relationship with the landscape. It is remarkably unchanged for several centuries. It is defined by an artificial spine of the Devils Dyke - Fair Green - The Hythe and Reach Lode that runs through




Map 2: Location of Reach

the entirety of the neighbourhood and reflects land use going back to at least the Saxon Period. The Devils Dyke is the largest Anglo-Saxon earthworks in the country. Fair Green hosts Reach Fair one of England's oldest festivals, receiving its charter from King John in 1201. There is growing evidence that that a dock may have existed at the site of the Hythe from the Roman period, that the Hythe is a human construction and the associated docks and basins were significantly more extensive than has been previously appreciated. As a port with access to the North Sea, the Hythe was of regional significance during the medieval period and shaped and drove Reach's growth as a commercial centre.

2.3 The Lode, probably created by the Romans but re-routed and re-modelled on several occasions through to the 18th century to join Reach with the River Cam, remains navigable and is popular with leisure boats.




Map 3: Reach 1887 Ordnance Survey Map

2.4 The axis of the village changed at some point in the 18th century. Before that date the Dyke ran intact to the Hythe and the village was probably centred on the current Drying Ground and orientated to a route running from the south west - Barston Drove, Great Lane, Little Lane and then east connecting again to Barston Drove via the Hythe. As far as we can establish, there are no houses round Fair Green that date from medieval period. Fair Green only appears to have been created and to have become the centre of the village from the 18th century. We can assert that some houses around the Green date from the 17th century based on the RCHM inventory of 1972. There are perhaps two houses in the conservation zone but nearer to the Hythe (White Roses and the Manor House) which can be dated to the medieval period and which are on the earlier axis. Today the village has a clearly defined centre around Fair Green and this and the surrounding area form a designated Conservation Area.

2.5 Reach also has a rich natural environment resulting from the chalk/fen junction that runs roughly east-west through the parish. Elsewhere valuable environments have arisen as a result of human activity for example the chalk grassland SSSI that has developed on the Devil's Dyke, the chalk cliff faces of Reach's clunch pits and in and around the borrow pits of Tubney Fen and Hurdle Hall.

2.6 Approximately two thirds of Reach's neighbourhood lies within the National Trust's Wicken Vision area. About one third of the neighbourhood is underlain by peat soils which offer great potential for environmental enhancement. We calculate that they hold over 120,000 tonnes of carbon which, under current management, is being lost to the atmosphere at the rate of over 900 tonnes per year.

2.7 About two thirds of the parish lies below 2 metres above sea level. Furthermore, as Reach Lode and the River Cam, which drain the area, sit above it, there is a growing risk of flooding, given projections for changes in rainfall intensity and pattern arising from climate change. In the longer-term the risk of inundation as the result of sea level rise is likely to increase.

2.8 Reach's infrastructure and services are limited. Whilst the village has a pub, a village hall and a church, there is no shop in the village centre (there is a farm shop at The Prospects Trust one kilometre south of the village), school or medical facilities. Employment opportunities are also limited. The electricity system is quite fragile, prone to outage in bad weather and close to capacity. The sewerage system capacity is similarly limited. Roads into the village are narrow, unlit and contain several bends of very poor visibility. In their current form, none of these services could support significant development. Reach is not on the natural gas grid and approximately 90% of households rely on oil for central heating.

2.9 Reach is a peaceful, small and attractive village set in landscape of significant character, with a strong community spirit and a long history, with much surviving evidence. The Devils Dyke, both a Site of Special Scientific Interest and a Scheduled Monument runs north-south through the village and the National Trust already owns significant areas of land within the neighbourhood and, through its Wicken Vision programme, aspires to acquire more for conservation and recreation benefit.

2.10 The Village holds an Annual Fair in May, one of England's oldest festivals dating back to a Royal Charter of 1201, which attracts visitors from all around Cambridgeshire and beyond. The community also:

- has planted two woodlands and created an orchard, tennis court, horse riding manège and cricket pitch;
- maintains the well-used Village Centre to a high standard;
- manages a children's play park and swings on Fair Green; and
- produces a village magazine every two months which is delivered to each household.

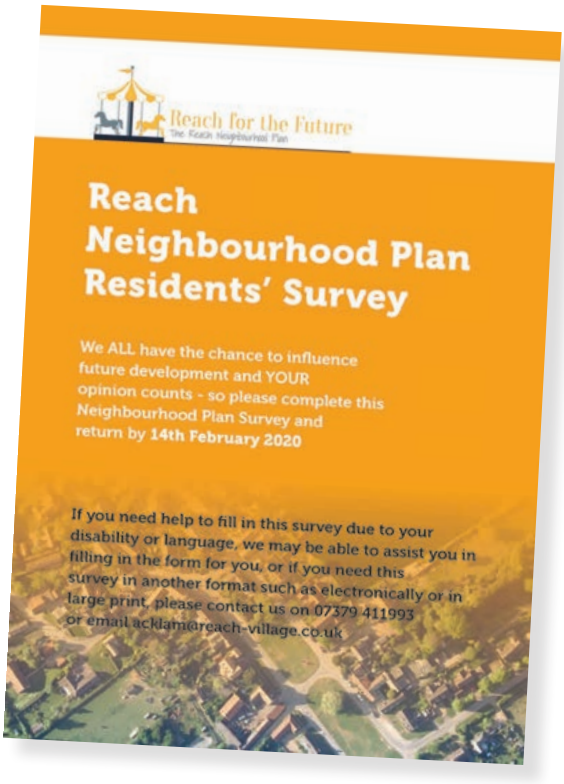
2.11 The community has ambitions to improve the landscape of the Hythe for conservation and recreation based on an improving understanding of the rich history of the site. There are many footpaths, droves, green lanes and byways through and around Reach, which are well-used and popular with locals and visitors, who value the tranquillity arising from limited and, on many routes, no vehicular traffic, views and variety of wildlife. Reach is proud of its pub, The Dykes End which was saved some years ago when the village purchased it. There is also a church with regular services. Reach looks to neighbouring villages for schools, shops and GP's surgery.

2.12 The most recent estimates from the Office for National Statistics suggest that the parish population in mid-2019 was 329, which suggests the population has decreased by nearly 10% from 365 in 2001.

### Residents' Survey Results

2.13 In 2020 a survey was distributed to every household to complete. Some 146 responses were received, and a comprehensive report of the results is available to view and download on the Neighbourhood Plan pages of the village website. The key messages arising from the survey are:

- Most respondents (36%) supported building 1-5 additional homes in the village by 2036, with 30% supporting between 6 and 10.
- The strongest support for any new housing was that it should be owner occupied but there was also a high level of support for housing suitable for downsizing, or for first time buyers and that new homes should be sustainable and built to the highest environmental standards.
- The protection of natural features, important views and paths and droves was very important to most residents.
- Most respondents agreed that it is important to minimise the impact of development on Reach's historic environment and archaeological sites.
- There is a high level of support for a community renewable energy project.
- Around 75% of respondents said more needed to be done to stop HGVs transiting the village.
- Nearly 80% said that safe access routes for pedestrians, cyclists and horse riders to Burwell and Swaffham Prior should be created.
- Only 8% of respondents never used the Dykes End PH.
- 37% of respondents used the Prospects Trust shop either weekly or monthly.
- There was an almost event split (yes/no) when asked whether the Plan should make provision for employment in the village but a slight majority in favour of promoting Reach's attractions.



## Current Issues

- There has been an erosion of the gap between the built-up area of the village and Burwell in the last 50 years. Further building in what remains of the gap or in the gap between the village and Swaffham Prior could have a serious impact on the distinct and discrete character of the village.
- It is possible that in future Reach will become a gateway to the National Trust Vision area and as the population in the Cambridge area grows, the Parish may experience increased visitors. This may lead to development pressure not necessarily in relation to housing but associated with tourism.
- The impact of vehicles. Parking is an issue on the Hythe and, increasingly, around Fair Green at weekends. Traffic levels are likely to increase as car users from the west of Burwell seek quicker commuting to Cambridge. Speeding is an issue which deters walkers, cyclists and horse-riders from using the roads to Burwell and Swaffham Prior which are narrow and have blind bends. Measures are being introduced to tackle the issue of HGV traffic transiting the village. In winter months increasing levels of recreational 4x4 traffic is making some Reach's byways impassable for walkers, cyclists and horse-riders.
- House prices are excluding many that want to live in the village from the housing market. The parish has a significantly higher proportion of home ownership then surrounding parishes.
- Other than those that work from home, few actually work in the village and, at the time of the 2011 Census, most travelled on average 12 miles to work. Commuting to Cambridge, the main work destination, by public transport does not meet most residents' needs and commuting by car is becoming progressively more difficult with frequent lengthy delays at the Stow-Cum-Quy A14 junction. The nearest railway stations are at Dullingham and Cambridge North.
- There is a need for safe, vehicle-free walking, cycling and equestrian routes to neighbouring villages especially Burwell.

# 3. PLANNING POLICY CONTEXT

**3.1** The regulations governing the preparation of Neighbourhood Plans require that they conform with the National Planning Policy Framework (NPPF) and the strategic policies of the Local Plan. The most recent version of the NPPF was published by the Government in September 2023. The Framework sets out a presumption in favour of sustainable development.

Paragraph 11 of the NPPF states:
Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:
a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;
b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:
i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or
ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole

**3.2** For communities preparing Neighbourhood Plans the NPPF states that they should:

- Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.
- Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan.

Towards the end of December 2022 the Government published proposed changes to the NPPF for consultation, as well as a proposal to establish National Development Management Policies which would provide a standard approach to considering proposals relating to, for example, heritage assets.

**3.3** At a more local level, the relevant Local Plan is the East Cambridgeshire Local Plan originally adopted in 2015 but, as noted below, revised in 2023. It focuses most growth on Ely, Littleport and Soham. For villages, including Reach, a "Development Envelope" is defined whereby proposals for new development within that Envelope is supported in principle but development outside it will be strictly controlled.

**3.4** On 19 October 2023 the District Council adopted a revision to its Local Plan. It addressed Policy Growth 1 and its associated supporting text and updated the housing requirement figure for East Cambridgeshire as a whole. The revision does not impact the Neighbourhood Plan in terms of future housing development in the parish.

## THE VISION

In 2031 Reach will have retained its distinct identity where limited sustainable development has taken place that:

- meets identified needs of the local community;
- respects the high quality historic and natural environment;
- embraces new technology;
- makes a positive contribution towards; and reducing the impact of climate change.
- increases levels of biodiversity.

# 4. VISION AND OBJECTIVES

4.1 The vision and objectives for the Neighbourhood Plan have been prepared taking into consideration the outcomes of the community engagement referred to earlier in this Plan as well as the evidence collected from published data, surveys and assessments. They also take account of the need to prepare a neighbourhood plan that conforms with the strategic policies of the Local Plan. The Vision sets out the over-arching approach as to how future development proposals in Reach will be considered through the Neighbourhood Plan. This is amplified through the definition of Objectives for the topic areas that have, in turn, guided the identification of both the planning policies and community actions contained in the Plan. The Planning Policies contained in the Neighbourhood Plan do not repeat the policies in the Local Plan or the NPPF but supplement them by adding local detail, bringing matters up-to-date and addressing locally specific matters.

4.2 Given that Reach is a small and relatively isolated rural community that currently has a limited range of services, the Vision for the Village through to 2031 is one where the level of future growth reflects the lack of services as well as recognising the significance of the historic and natural environment, while welcoming the use of new technology in order to minimise the adverse impact on the climate and to enable residents to change how they live and work.

### Objectives

The Objectives of the Neighbourhood Plan have been developed from the information gathered during its preparation. Each Objective has informed and guided the content of the Planning Policies and Community Actions that follow.

#### Housing Objectives

1. Meet the projected housing requirement for the village to 2031.
2. Ensure that new homes respond to the identified local needs of Reach.

#### Economy and Tourism Objectives

3. Encourage small scale locally sustainable economic initiatives that support the village.
4. Manage opportunities for environmentally sensitive tourism related initiatives.

#### Natural Environment Objectives

5. Minimise impact on the natural environment and improve biodiversity.
6. Protect and enhance the rural setting of the village.

#### Historic Environment Objectives

7. Ensure new development is appropriate to the historic character of the village.
8. Recognise and protect the historic importance of buildings and character areas.

#### Development Design Objectives

9. Have a positive effect on the environment, by promoting actions that contribute to mitigating the Climate Crisis and reducing the carbon footprint.
10. Influence and guide suitable designs of new developments within the Parish.

#### Infrastructure and Services Objectives

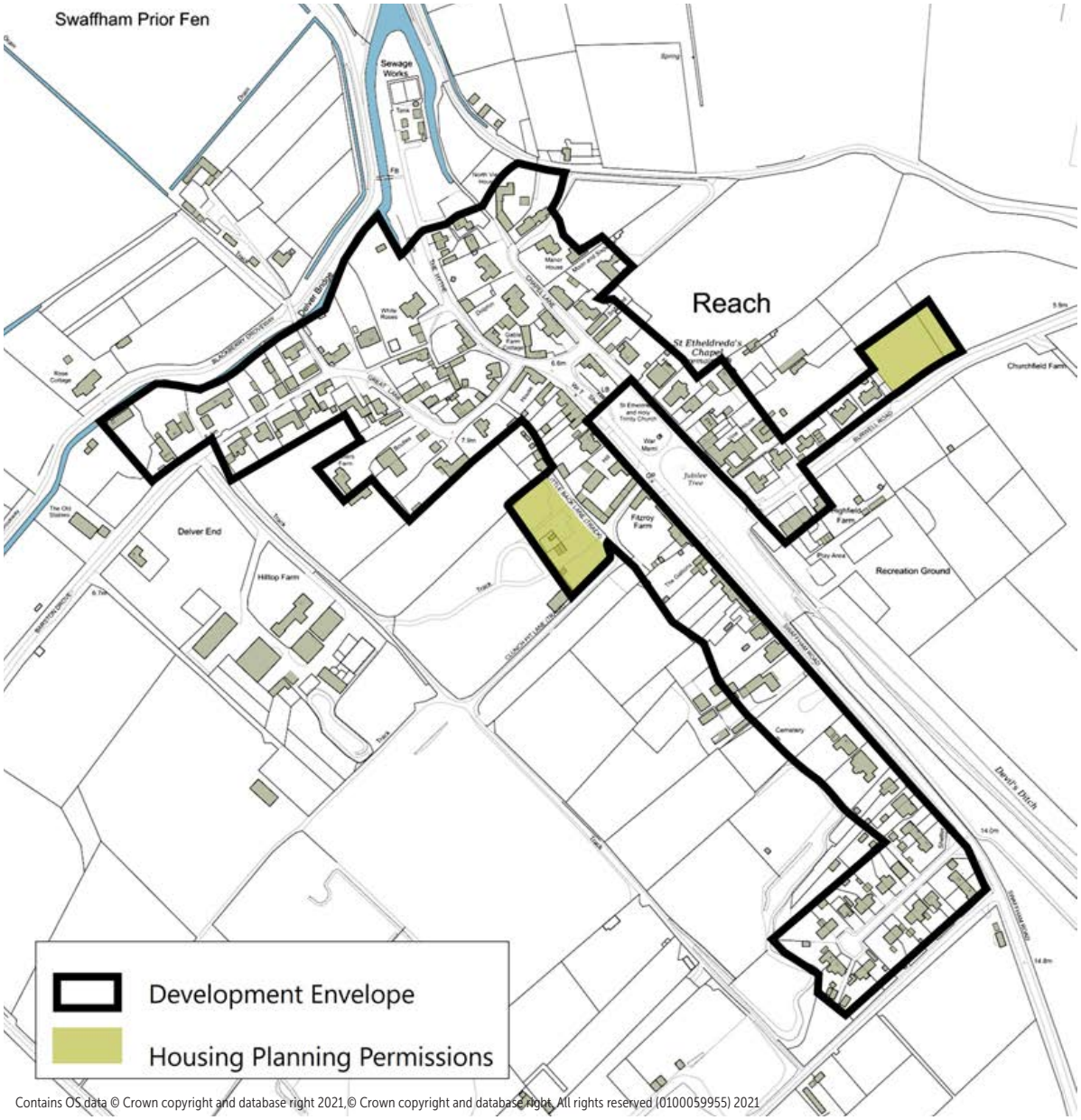
11. Retain existing facilities and encourage the provision of new services and facilities.
12. Ensure that the essential infrastructure including highways is maintained and, where necessary, improved.

#### Travel Objectives

13. Minimise the impact of the motor vehicle on the village.
14. Improve public transport provision to Cambridge and Newmarket
15 Improve opportunities for non-motorised travel, especially the creation of vehicular traffic free routes to Burwell and Swaffham Prior.

# 5. PLANNING STRATEGY

5.1 As noted above, the planning policy framework for the district is contained in the East Cambridgeshire Local Plan 2015 (as amended 2023). It sets out the spatial strategy and policies for the future development of the district and identifies sites for different types of development such as housing and employment, to deliver the planned growth for the district to 2031. The focus of growth is Ely, Littleport and Soham while villages such as Reach with a defined "Development Envelope" will have more limited development within the envelope to help to support local services, shops and community needs. Preparing a neighbourhood plan enables communities such as Reach to review the Development Envelope within the context of the overall development strategy for East Cambridgeshire.

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Map 4: Development Envelope

5.2 The Neighbourhood Plan supports limited growth in Reach commensurate both with its lack of services and the importance of its rural character and presence of natural and historic designations of national importance and the wishes of the great majority of its residents.

5.3 A new Development Envelope, illustrated on Map 4, is defined for the main built-up area of the Village to manage the location of future development and to protect the intrinsic value of the countryside that surrounds the built-up area. It is based on that in the Local Plan but takes account of recent planning decisions and other changes in circumstances since the Local Plan was published.

5.4 In order to manage the potential impacts of growth, new development will be focused within the Development Envelope, but only to the extent that any such proposal should not have a detrimental impact on the setting of historic assets, landscape features and the natural environment, and the amenity of residents in terms of noise, smell, vibration, overlooking, overshadowing, loss of light, other pollution (including light pollution), access to the countryside, or volume or type of vehicular activity generated.

5.5 There may be situations where it is necessary for development to take place outside the Development Envelope, but this will be strictly limited to that which it can be demonstrated is essential for the operation of utilities infrastructure, existing businesses, agriculture, horticulture, forestry, outdoor recreation and other uses that need to be located in the countryside. Such proposals will still need to demonstrate how they will not have a detrimental impact on the landscape and does not give rise to an unacceptable increase in vehicle movements. However, this approach is not intended to restrict the conversion of existing agricultural buildings to residential or business uses, where any proposals meet government regulations and local planning policies for such conversions.

## POLICY RCH 1 - SPATIAL STRATEGY

The Reach Development Envelope is defined on the Policies Map. Sustainable development proposals within the Envelope will be supported where they are of an appropriate scale and do not have an unacceptable impact on:

i. the amenity of residents;
ii. the historic and natural environment;
iii. the provision of services and facilities; and
iv. the highway network.

Proposals for development located outside the Development Envelope will only be supported where they are essential for the operation of utilities infrastructure, existing businesses, agriculture, horticulture, forestry, outdoor recreation and other exceptional uses, where:

a. It can be satisfactorily demonstrated that there is an identified local need for the proposal;
b. It cannot be satisfactorily located within the Development Envelope; and
c. it would not have an unacceptable impact on the character of the landscape or give rise to an unacceptable increase in vehicle movements.

**The most extraordinary fact in Reach is that about 85% of house back onto open countryside and of the remaider none are more than 2 minutes walk away from it. Reach has a distinct shape with clearly defined boundaries.**

Villager comment from 2020 survey

# 6. HOUSING

### Housing Objectives

1. Meet the projected housing requirement for the village to 2031.
2. Ensure that new homes respond to the identified local needs of Reach.

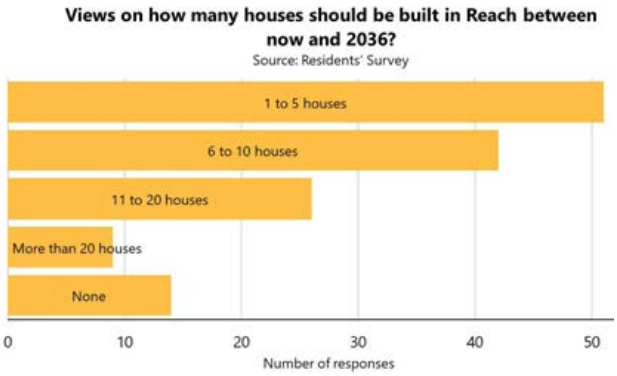
### New Homes

**6.1** A key role of the Neighbourhood Plan is to identify the quantity of new housing to be provided during the period covered by the Plan and to identify where it will be located. The National Planning Guidance states that "the 'policies and allocations' in the plan should meet the identified housing requirement in full, whether it is derived from the standard methodology for local housing need, the housing figure in the area's strategic policies, an indicative figure provided by the local authority, or where it has exceptionally been determined by the neighbourhood planning body."

**6.2** The adopted Local Plan does not identify a specific housing requirement for the village but, in April 2019, the District Council indicated that there is no housing requirement for the period to 2031. This is reinforced by the content of the Local Plan Single Issue Review consultation (March 2021) which does not identify a need to allocate further sites across the District to meet the current calculated need. As such, there is no need to allocate new sites for housing development in the Neighbourhood Plan.

**6.3** The 2018 Reach Residents' Survey, referred to previously, asked how many houses they thought should be built in Reach by 2036. 36% of respondents supported between 1 and 5 houses and a further 30% supported between 6 and 10. Only 25% supported more than 10 houses while 10% of respondents did not want any additional housing.

**6.4** At 1 February 2021 there were planning permissions for 8 additional homes in the parish that had yet to be completed. These permissions are identified in Appendix 1. In some instances, it is possible that the permissions may expire before development commences. Given that the principle of the development has been agreed through a planning permission, sites adjoining but outside the Development Envelope are identified for development should work on site not commence before the permissions expire.




**6.5** There will undoubtedly be opportunities through the lifetime of the Neighbourhood Plan for development that satisfies the Spatial Strategy set out in Policy RCH1 of the Plan, such as infill plots and barn conversions. However, it is not possible to predict how many such opportunities might arise during the Neighbourhood Plan period and no estimate has therefore been made for any such housing provision.

## POLICY RCH2 - HOUSING DEVELOPMENT

This Plan provides for around 8 additional dwellings to be developed in the Neighbourhood Plan area between 2021 and 2031. This growth will be met through:

i. The implementation of planning permissions that had not been completed as at 1 February 2021 including:
* land opposite 20 Burwell Road as identified on the Policies Map (3 dwellings), and
* land southwest of Hill Farm (2 dwellings); and

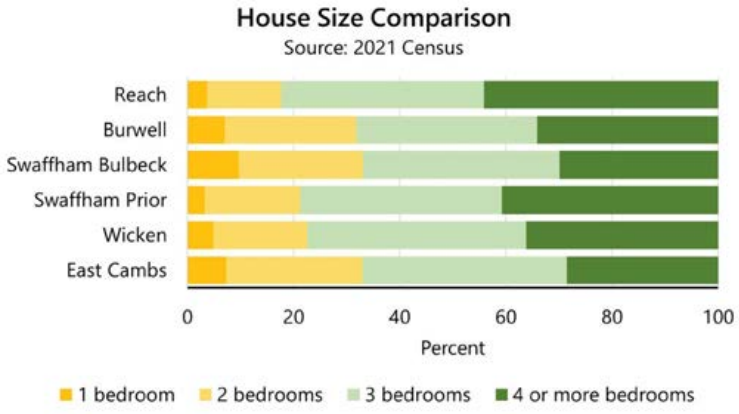
ii. small "windfall" sites and infill plots within the Development Envelope that come forward during the Plan period and are not identified in the Plan.

### Affordable Housing

6.6 The latest government figures identify that median house prices in East Cambridgeshire District are equivalent to almost 9 times the median gross annual earnings of residents. This disparity has a huge impact on the ability of people to buy housing, especially those on lower incomes. Affordable housing provides a potential accommodation solution for those that need to live in the Village but are unable to access open market housing.
A specific "local needs" housing survey has not been undertaken as part of the Neighbourhood Plan preparation process but affordable housing planning policies in the adopted Local Plan and in the NPPF, as well as the development policies in this Neighbourhood Plan, would apply should a specific need be identified during the lifetime of the Neighbourhood Plan.

### Dwelling Sizes

6.7 Research undertaken in preparing the Neighbourhood Plan identified that the proportion of one and two bedroomed homes in Reach is significantly lower that in neighbouring villages and in East Cambridgeshire as a whole, based on the 2021 Census.There is, however, a higher proportion of three and four bedroomed homes when compared with the district and neighbouring parishes.




6.8 Given the relevant shortfall in three bedroomed houses, new development that provides such a home will be supported where it satisfies the other requirements of the Plan.

## POLICY RCH3 - HOUSING MIX

Proposals for housing development should contribute to meeting the existing and future identified needs of the Neighbourhood Plan Area. Proposals that deliver homes with one, two or three bedrooms will be supported.

# 7 THE LOCAL ECONOMY AND TOURISM

**Economy and Tourism Objectives**

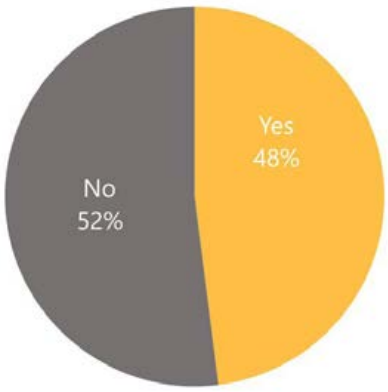
3. Encourage small scale locally sustainable economic initiatives that support the village.
4. Manage opportunities for environmentally sensitive tourism related initiatives.

7.1 Reach is not generally a place of work, with few businesses being recorded in the Parish. There is a high proportion of residents that work from home, a figure that will have increased during the 2020/21 COVID-19 Pandemic. The three highest sectors of employment at the time of the 2011 Census were Professional, scientific and technical activities; Human health and social work activities; and Education. Although the village is set in a highly agricultural landscape, only 11 residents were employed in agriculture in 2011. ((The 2021 Census data for Reach was not published as of May 2023)

7.2 The Residents' Survey asked whether the Neighbourhood Plan should make provision for employment in the village and the opinion in favour or against was very close.

**Should the Neighbourhood Plan make provision for employment in the village?**

Source: Residents' Survey




7.3 Employment development can, where not carefully considered, have a significant detrimental impact of the environment and on residents' wellbeing. The Neighbourhood Plan supports the creation of new jobs where such development is sensitively located and would not have a detrimental impact on the character of the village, the local road network and the amenity of residents living near the site or on the access route to it. It is envisaged that any business development would remain small in terms of the size of the premises and the number of people employed on the site. It may be necessary to restrict hours of operation of such uses to minimise the impact of the business on existing residents.

7.4 Given the location of the village, proposals that would generate a significant number of jobs or movement of materials which would increase road traffic volume could have a detrimental impact on the roads and would not be supported.

## POLICY RCH4 - NEW BUSINESSES AND EMPLOYMENT

Proposals for small scale business development, including those that support the requirements of residents working from home, located within the Development Envelope, as defined on the Policies Map, will be supported where there is no unacceptable impact on:

- the amenity of residents in the immediate locality by reason of noise, smell, vibration, overlooking, overshadowing, loss of light, other pollution (including light pollution); or
- the volume or type of vehicular activity generated; or
- the character or appearance of the built environment.

7.5 There may be opportunities to convert existing farm buildings to small business units in locations where the building is no longer viable or needed for agricultural uses. In such instances, there should not be a detrimental impact on the local area and nearby residents.

## POLICY RCH5 - FARM DIVERSIFICATION

Proposals for the use of redundant traditional farm buildings and other rural buildings for employment purposes will be supported where it can be demonstrated that the buildings concerned are no longer viable or needed for agricultural uses.

### Tourism Development

7.6 The Residents' Survey asked whether the villages attractions should be promoted, to which 58% of respondents agreed although there were a number of comments concerning the availability of parking.

7.7 The Landscape Appraisal noted that the village and its landscape offers opportunities for visitors to engage with the natural environment, but that any change would require a bespoke and sensitive approach to avoid undermining the special qualities of the village. The Wicken Fen Vision offers an opportunity to consider whether tourism in Reach is something to be developed or managed. Being one of the villages on the edge of Wicken Fen and nearest to Cambridge, it could become a destination for visitors to explore the Fen on foot or by cycle as well as the continued walking trips along the Devil's Dyke. Any development will need to be carefully managed, but it is important that a strategy for managing visitors is considered rather than having to react to future demand. Any encouragement of tourism will need to carefully consider how it may change the level of recreational pressure on key habitats. Even small increases in recreational pressure could have significant impacts on the Devil's Dyke, which due to its narrow linear nature has few options available for managing pressures. It will be important that active engagement with the National Trust over the implementation of the Wicken Vision continues to ensure that the scale of any proposals and the active management of visitors is a high priority.

7.8 The Neighbourhood Plan does not propose specific projects, but puts forward the following thoughts for consideration and further investigation:

- Consider the development of Reach as a gateway to Wicken Fen and a destination when visiting the NT Vision area
- Promote Reach as an isolated destination only accessible via sustainable modes of transport
- Consider the creation of a car park for visitors outside of the village
- Support the creation of community cafe /cycle hire (linked to cycle hire at Wicken Fen)
- Improve interpretation of the historic landscape and improved access to The Hythe
- Consider establishing field centre/ environmental education programme and Youth Hostel linked to the National Trust
- Consider branding Reach - heritage, environment and local arts/produce
- Consider provision of increased overnight accommodation
- Provision of additional footpaths and/or signage to improve dispersal and reduce pressure

# 8 NATURAL ENVIRONMENT

## Natural Environment Objectives

5. Minimise impact on the natural environment and improve biodiversity.
6. Protect and enhance the rural setting of the village.

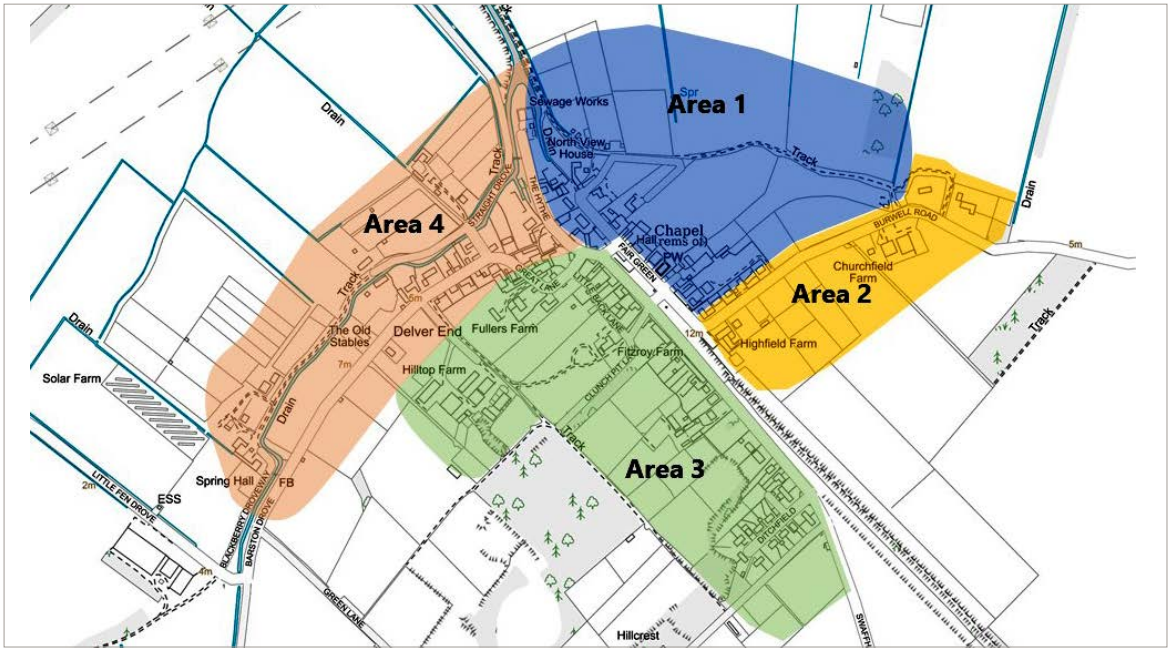
### Landscape

8.1 A separate Landscape Appraisal of the Neighbourhood Area was prepared by Alison Farmer Associates in order to provide a robust evidence base to support the development of policies in the Neighbourhood Plan. The Reach Neighbourhood Plan: Landscape Appraisal Final Report (May 2020) can be found in the Supporting Documents section of the Neighbourhood Plan website.

8.2 The parish is included within several landscape character assessments and at a range of scales including National Character Areas (NCA's), Cambridgeshire Landscape Guidelines and the East of England Typology. All three assessments classify the parish into two landscapes, namely the fen and chalk hills. These two landscapes have very different landscape characteristics which are clearly summarised in the NCA and detailed in the Landscape Appraisal.

8.3 The East of England typology defines the boundary between the chalk and fen landscape. Furthermore, in its description of the chalk and fen landscape types, it highlights that the chalk landscapes contain a low density of settlement which is rural in character comprising discrete historic villages and a scattering of large farms. In terms of the fen landscape, it notes that they are sparsely populated and have a horizontal and geometric character reinforced by straight roads, ditches and linear lines of vegetation. The Fens are described as a quiet, remote landscape where the sky plays a particularly dominant role in creating mood and interest.

8.4 The Landscape Appraisal broke the main built-up area of the village and its environs into four distinct character areas. These are illustrated on Map 5. Each area is described in the Appraisal in terms of character and context followed by an evaluation of sensitivity and capacity to accommodate development in the context of the existing settlement and its setting.




Map 5: Landscape Appraisal Character Areas

8.5 Overall, the Appraisal concluded that no areas surrounding the village can accommodate large scale development without adverse effects. Nevertheless, areas 2 and 3 have greatest capacity to accommodate small scale housing or tourism related development but it should not be assumed that these areas are free of sensitivity. Proposals in these particular areas should have regard to the sensitivity and capacity of the area and, where feasible, promote mitigation measures as part of the development.

8.6 The Landscape Appraisal also identified the importance of the gaps between the village and Burwell and Swaffham Prior and the need to limit any erosion of these. Over the course of time, and especially in recent years, individual developments have reduced what was once an open landscape. Current commercial, power infrastructure development and the creation of a static caravan site in Burwell will significantly erode the gaps. Unchecked, further development will gradually erode the feeling of separation between the villages. The Neighbourhood Plan Spatial Strategy will help to limit further development in these areas, but it is essential that any proposals that accord with Policy RCH1 have regard to the landscape character of the area and do not result in a further reduction in the gaps.

8.7 Helpfully, the Landscape Appraisal provides "management guidelines" to inform land management decisions, inspire local community initiatives, inform development proposals, and assist decision makers in order to reinforce local character and improve legibility. The guidelines are:

- Enhance biodiversity of lane verges throughout the Parish, including in the centre of the village, through appropriate management in collaboration with landowners and highways. Barston and Straight Drove are particularly valued for chalk grassland species and would benefit from positive management.
- Plant new hedgerows/hedgerow trees on the southern edge of the village to reduce the visual prominence of housing at Ditchfield.
- Seek opportunities to reduce the visual effects of pylons and of the Burwell Sub-Station through appropriately located woodland planting and linear lines of trees which can create a layering of vegetation and screen views. Any planting needs to take account of key vistas and views identified by the local community and the protection of peat soils which may be susceptible to desiccation and carbon loss.
- Undertake research and conservation work at The Hythe and consider the suitability of pursuing an extension to the existing Conservation Area boundary. Given this areas historic significance and the lack of encroachment from development within the village, consideration should also be given to the refinement of the Settlement Boundary [Development Envelope] as set out in Local Plan in order to exclude land which forms an immediate setting.
- Undertake survey work to establish if the chalk cliffs in the former chalk pits should be identified as County Wildlife Sites, Regionally Important Geological Sites or have archaeological significance.

8.8 The "development guidelines" in the Landscape Appraisal, set out in Table 1, have helped to inform the content of the Plan and its policies to ensure that the landscape qualities of the parish and the setting of the village within it is maintained and enhanced. The table illustrates how the guidelines are translated into planning policy.

| Reach Landscape Appraisal Development Guidelines | How the Neighbourhood Plan addresses them |
|---|---|
| New development should strengthen approaches and gateways to the village. | Policy RCH13 |
| Avoidance of ad hoc development along Swaffham Road and Burwell Road especially where it reduces the gaps and views to the wider landscape and causes a loss of native hedgerow and rural lane character. | Policy RCH 1<br><br>Policy RCH 8 |
| Avoid curtilage treatment that urbanises the rural lanes on approach and within the village e.g. close board fencing, metal railings, concrete kerbs/urban paviours, fencing/gates and proliferation of add hoc ancillary development such as bin or bike stores. | Much of this does not require planning consent, but residents will be encouraged to have regard to this guidance when considering projects. |
| Avoid development which extends above the 15m contour and or extends the gateways into the village. Changes of this sort are likely to alter perceptions regarding the position and historic form of the village. | Policy RCH 1 |
| Development of small scale solar farm should only occur on the fen and should not be installed on the more visible slopes of the chalk scarp. Solar farm developments should be small in scale and should not be visible in views from the north facing slopes of the chalk, or Devils Dyke, especially where the landscape provides a setting or approach to the village. | Policy RCH 1<br><br>Policy RCH 8 |

Table 1: Landscape Appraisal Development Guidelines

8.9 The Neighbourhood Plan Residents' Survey asked people to identify what they considered to be important views within the Neighbourhood Plan Area. Not surprisingly, given the nature of the landscape, a significant number of views were noted, as identified in the Landscape Appraisal, although no formal assessment of the features of these views was made. A separate Appraisal of Important Views from public locations has therefore been prepared in support of the Neighbourhood Plan. Development proposals that have a detrimental impact on the key features of the views will not generally be supported.

## POLICY RCH6 - LANDSCAPE QUALITY

As appropriate to their scale, nature and location development proposals should:

i. have regard to, and conserve or enhance, the rural character and the setting of the village as identified in the Reach Landscape Appraisal;

ii. not result in the erosion of the settlement gaps identified on the Policies Map;

iii. ensure that there is no unacceptable impact on the key features of important views identified on the Policies Map and described in the Appraisal of Important Views; and

iv. respond positively to the Landscape Appraisal Development Guidelines, identified in Table 1 of the Neighbourhood Plan.

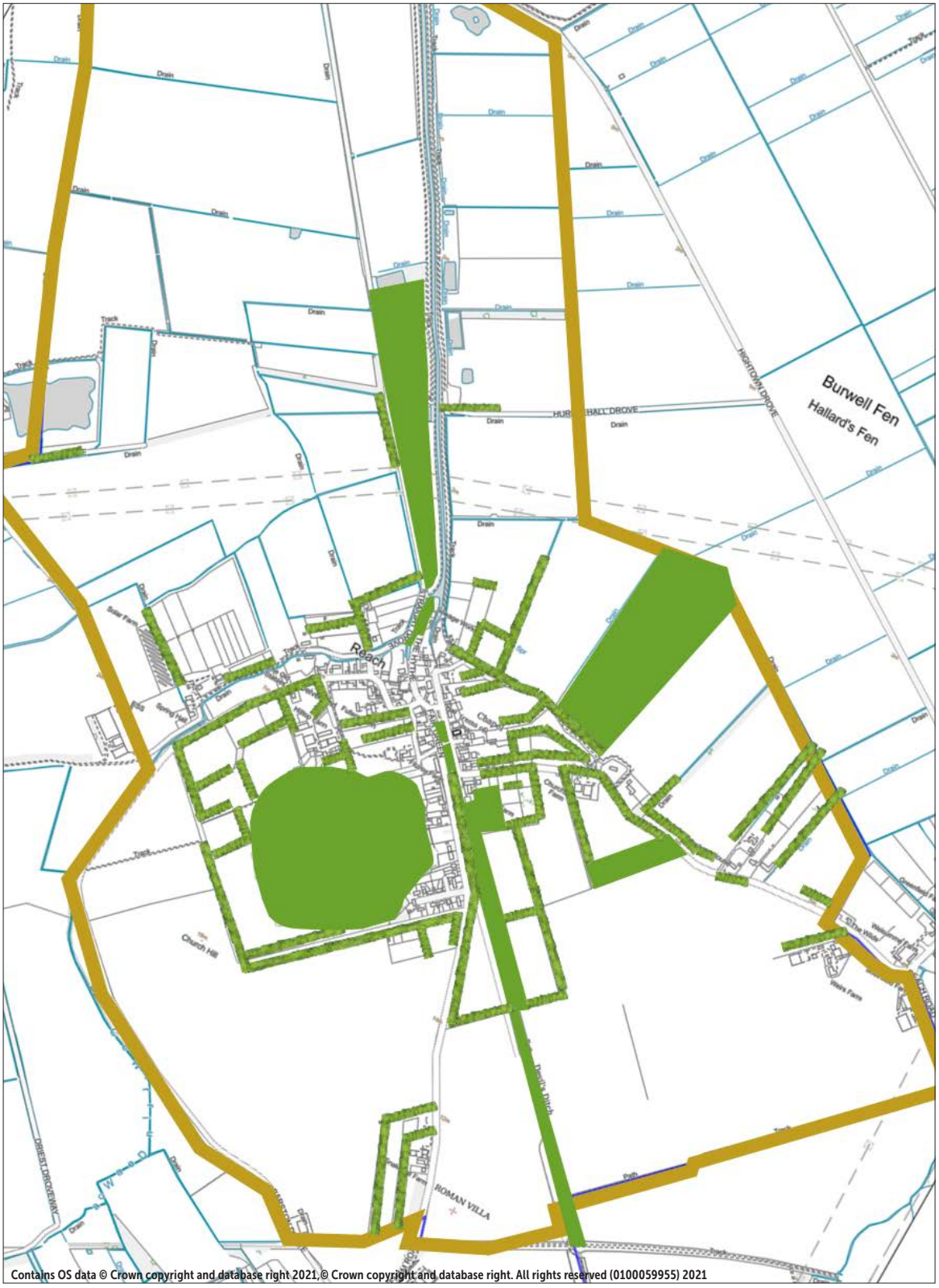
**8.10** Of particular relevance to the Fen landscape is the implementation of the National Trust's Wicken Fen Vision, a 100 year Plan. Approximately two thirds of the Parish falls into the Vision area which includes the north western half of Reach Parish including Tubney Fen and Hurdle Fen. It also abuts the northern, western and eastern edges of Reach's development envelope such that the visual impact of any proposed development in these areas needs particular scrutiny. The Vision seeks to create a mosaic of habitats and natural processes through careful management of water and grazing in order to protect, extend and built resilience of the existing National Nature reserve at Wicken Fen and to enable access to natural greenspace for the growing population in the Cambridgeshire area. Additionally, the Vision is increasingly focused on the retention of carbon in the peat soils that underlie much of the area.

### Green Infrastructure

**8.11** Green Infrastructure is defined as the network of natural and man-made features such as open spaces, woodlands, meadows, footpaths, waterways and historic parks, which help to define and to link the communities, villages, towns and cities with each other and to the surrounding landscape. In 2011 a Green Infrastructure Strategy was prepared and adopted for the whole of Cambridgeshire.

**8.12** For East Cambridgeshire, the Strategy sets a number of priorities but, given the varied nature of the landscape of the district, it is very generalised and is difficult to specifically apply them to Reach.

**8.13** The Neighbourhood Plan Landscape identifies important open spaces which is supplemented by the Reach Biodiversity Assessment commissioned in support of the preparation of the Neighbourhood Plan. Combined, these confirm the significance of the existing green (and blue) infrastructure network in the parish which the Neighbourhood Plan seeks to protect and enhance. Map 6 identifies this network. Proposals will be supported where they maintain and enhance this network.




Map 6: Green Infrastructure Network

## POLICY RCH7 – GREEN INFRASTRUCTURE

The Plan identifies a Green Infrastructure Network on Map 6 (and as shown on the Policies Map).

Proposals which will reinforce, link, buffer and create new green infrastructure, or which would promote, manage, and interpret the identified Green Infrastructure Network and enhance its public enjoyment will be supported.

Development proposals which would result in the loss or an unacceptable harm to the Green Infrastructure Network will not be supported except where it can be satisfactorily demonstrated that the need for and benefits of the development substantially outweigh any impacts on the Network.

### Biodiversity

**8.14** Despite its location in the vicinity of Wicken Fen National Nature Reserve, the parish has little in the way of wildlife designations, with only Devils Dyke being designated as a Site of Special Scientific Interest. There are, however, a number of habitats across the parish that play an important role in the biodiversity network.

**8.15** Protected habitats should be given consideration when proposing new development. Cambridgeshire County Council has produced a Biodiversity Checklist and Biodiversity Guidance Notes which provides more information on habitats for developers. In September 2020 East Cambridgeshire District Council adopted a Natural Environment Supplementary Planning Document (SPD).

**8.16** The Reach Biodiversity Assessment, is published as a separate evidence document on the Neighbourhood Plan pages of the Reach village website. Summarised, the Assessment concluded that:

- the village contains a striking contrast of habitat types, moulded by the underlying geological conditions, which result in an area rich in biodiversity features.
- the diversity of habitats presents numerous exciting opportunities for the promotion of biodiversity, some of which are already being realised in the form of the Wicken Vision.
- the fenland habitats to the north and west of Reach habitats contain a rich aquatic flora and support important assemblages of birds all year round.
- The Devil's Dyke is one of the most important areas of calcareous grassland habitats within the UK, with some parts of international significance.
- Historical quarrying activities have resulted in the creation of a complex mosaic of habitats around the clunch pits on Chapel Hill.

**8.17** The Biodiversity Assessment identified a number of principles that should be applied to all development, as set out below.

- Ensure the mitigation hierarchy is followed. 1) Ecological impacts should be avoided, this may require development in alternative locations. 2) Where ecological impacts are impossible to avoid these should be mitigated, and measures will be required to minimise the scale of impact. 3) As a last resort when impacts cannot be avoided or mitigated then compensation must be provided.

- Ensure no detrimental impacts on Local Green Spaces.
- Any development must adequately assess the potential impacts on ecological features and demonstrate how the mitigation hierarchy has been followed.
- Development should deliver a measurable net gain in biodiversity and this should be calculated with an appropriate metric. In anticipation of a mandatory 10% biodiversity net gain within the forthcoming Environment Bill a Biodiversity Metric has been created by Defra (Crosher et al., 2019). This metric uses habitats as a proxy for biodiversity value and enables a quantifiable comparison of biodiversity value before and after development. Where it is not possible to deliver a biodiversity net gain within the site then off-site measures should be explore. Forthcoming development in Reach must deliver a measurable biodiversity net gain with a target of 20%. This should be calculated using the most up to date metric recognised by Defra.
- Biodiversity measures should be an integral part of development design. Each proposal must be supported by a Landscape and Ecology Management Plan which details how existing ecological features are to be protected, how new features will be created, and how these will be managed in the long-term.
- As standard, all development should incorporate features integrated into the fabric of the buildings to provide habitat for nesting birds and roosting bats. Each dwelling or structure should have a minimum of two integrated bird boxes and two integrated bat boxes. Target bird species are swift and house sparrow, for open cart lodge type structures swallow should be the target species. Crevice roosting bats, such as pipistrelles should be target bat species.

**8.18** Development proposals will be expected to demonstrate how their proposal, regardless of size, has considered nature conservation and biodiversity and how they have had regard to the principles set out above. Wherever possible we would expect to see existing features retained and opportunities for new features to be created. The Network includes the identified Local Green Spaces as set out in Policy RCH9. That policy follows the format as set out in the NPPF towards Local Green Spaces. As such any proposals which affect Local Green Spaces will be determined based on the contents of Policy RCH9 rather than Policy RCH7.

**8.19** At a national level, matters have moved on considerably as the Plan has been prepared with mandatory Biodiversity Net Gain set to commence from January 2024 (for major development) and April 2024 (for minor development). The implementation of mandatory biodiversity net gain will be via extensive government legislation and guidance. In this context, it is not considered appropriate for the Plan to repeat such requirements. Nevertheless, the situation will be carefully monitored throughout the Plan period. Whilst national legislation is unlikely directly to affect householder applications the inclusion of an element of biodiversity gain into such proposals, including bird boxes, insect 'hotels', bee blocks, bat boxes and/or hibernation holes will be welcomed.

### Local Green Spaces

**8.20** There are a number of important open areas within the village that make important contributions to the character and setting of the built environment. The NPPF enables the designation and protection of land of particular importance to local communities as Local Green Spaces ('LGS') in neighbourhood plans. Such designations rule out new development other than in very special circumstances. Paragraph 102 of the NPPF states that the designation should only be used where the green space is:

- In reasonably close proximity to the community it serves;
- Demonstrably special to a local community and holds a particular local significance, for example, because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- Where the green area concerned is local in character and is not an extensive tract of land.

It is recognised that the designation of Local Green Spaces should not be used simply to block development.

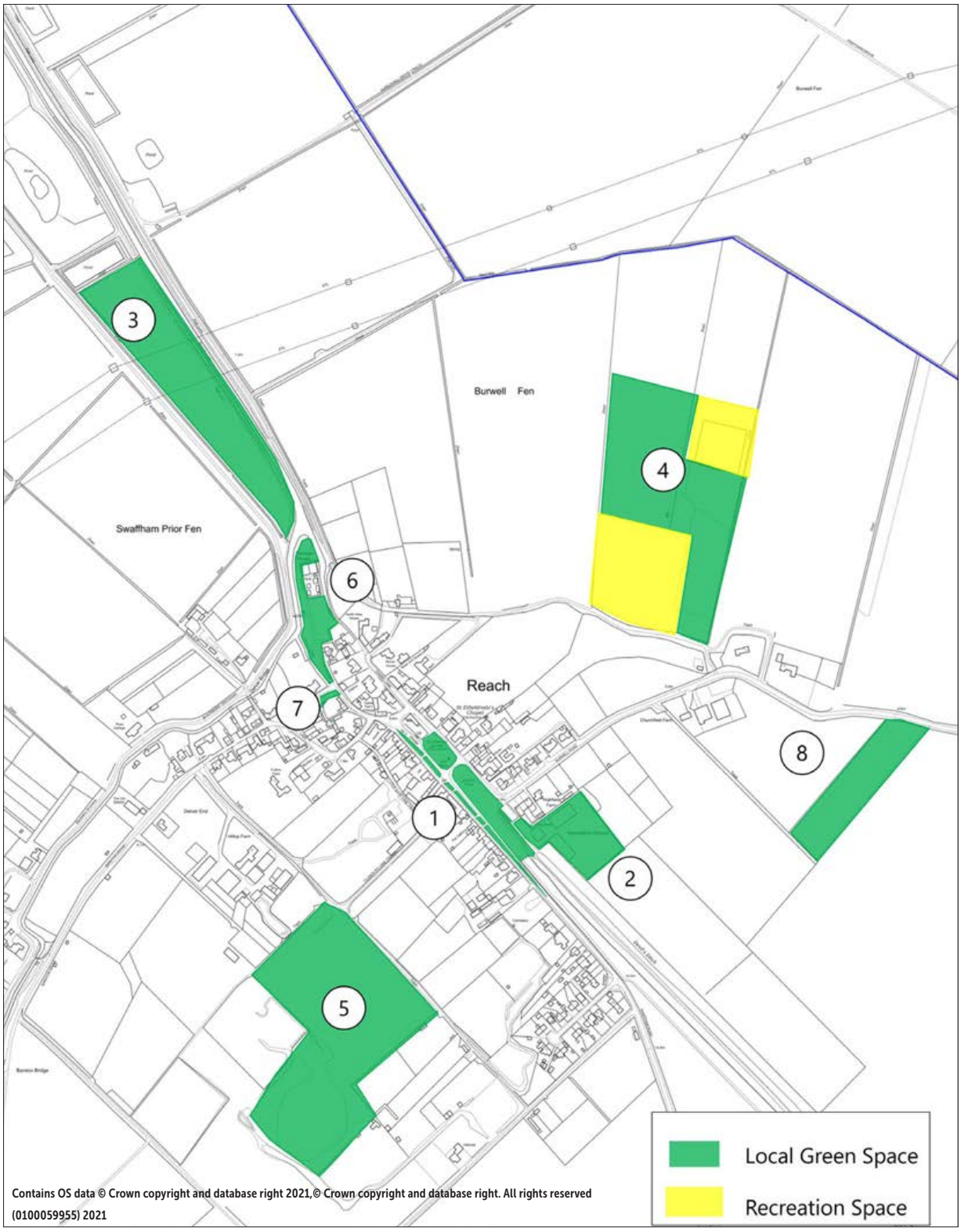
**8.21** A separate Local Green Space Appraisal has been undertaken as part of the preparation of the Neighbourhood Plan, which demonstrates how certain local spaces meet the criteria in paragraph 102 of the NPPF. The spaces that meet the criteria are identified in Policy RCH8 and are illustrated on Map 7 and the Policies Map. Careful consideration has been given to the "24 Acres" against the NPPF criteria. Combined, it is likely that the area would fail the criteria of not being an "extensive tract of land". The Cricket Field and the Manège are sports and recreation facilities and are protected under Policy RCH17. The remainder of the 24 Acres would, however, still constitute an extensive tract of land and likely fail the NPPF criteria. All of the land is identified as part of the Green Infrastructure Network in Policy RCH7 and, with this in mind, the unmanaged area to the north of the Manège is excluded from the Local Green Space designation.

**8.22** The identification of these spaces as LGS means that development is restricted to that which has to be demonstrated as being essential for the site, in line with the Green Belt policies defined by the NPPF. Permitted development rights, including the operational requirements of infrastructure providers, are not affected by this designation.

## POLICY RCH8 - LOCAL GREEN SPACES

The following Local Green Spaces are designated in this Plan and identified on Map 7 and the Policies Map.

1. Fair Green and verges
2. The Recreation Ground
3. Reach Pocket Park
4. The Community Orchard and woodland at the 24 Acres
5. Reach Wood
6. The Hythe
7. The Drying Ground
8. Reach Plantation




Map 7: Local Green Spaces

# 9 HISTORIC ENVIRONMENT

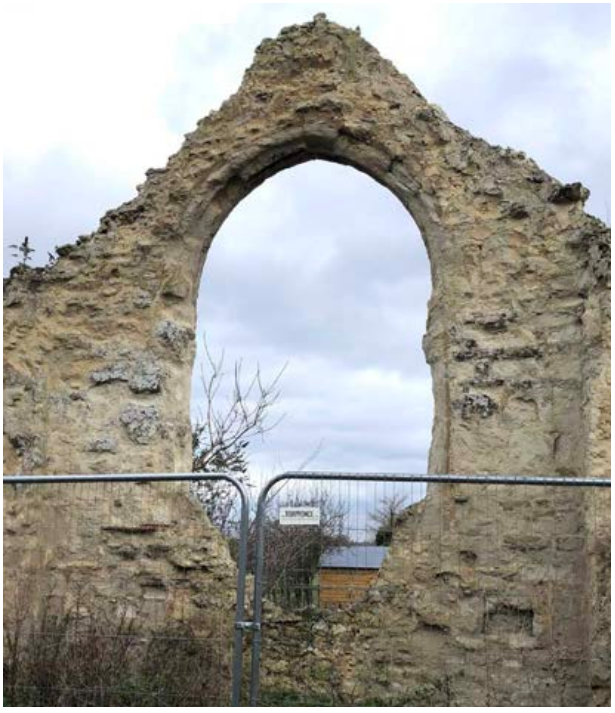
### Historic Environment Objectives

7. Ensure new development is appropriate to the historic character of the village.
8. Recognise and protect the historic importance of buildings and character areas.

**9.1** The built environment and community cohesion of Reach village today has been shaped around Fair Green - a central area of common land framed and dissected by small public highways (C class roads). There is a further registered common The Hythe which dates from times when the village was a busy port. Much of the centre of the village is a Conservation Area which was designated may years ago in 1975. The District Council has yet to prepare a Conservation Area Appraisal for the area or consider whether an extension of the Conservation Area might be appropriate. Given that the Conservation Area has been designated for over 45 years, such an Appraisal is now long overdue. Within the parish as a whole there are a number of archaeological sites of significance, including the Roman Village and Iron Age Settlement discovered between Swaffham Road, Devils Dyke and the old railway line, which, along with Devils Dyke, is a scheduled monument.

### Heritage Assets

**9.2** Listed buildings, conservation areas and scheduled monuments are collectively known as "heritage assets" and are protected from harm by Government legislation. Probably the most significant heritage asset is the Devil's Dyke Scheduled Monument that runs between the village and Wooditton. However, this does not overshadow the many listed buildings, particularly around Fair Green, which make Reach so special. Details of designated heritage assets are contained in Appendix 2. Careful consideration of proposals that might impact on these heritage assets or their setting will be needed and a balanced judgement will be needed, having regard to the scale of any harm or loss and the significance of the asset.



## POLICY RCH9 – HERITAGE ASSETS

As appropriate to their scale, nature and location development proposals should:

a. preserve or enhance the significance of the heritage assets of the Village, their setting and the wider built environment, including views into, within and out of the Conservation Area as identified on the Policies Map;

b. retain buildings and spaces, the loss of which would cause harm to the character or appearance of the Conservation Area;

c. contribute to the Village's local distinctiveness, built form and scale of its heritage assets through the use of appropriate design and materials;

d. be of an appropriate scale, form, height, massing, alignment and detailed design which respects the area's character, appearance and its setting;

e. demonstrate a clear understanding of the significance of the asset and of the wider context in which the heritage asset sits, alongside an assessment of the potential impact of the development on the heritage asset and its context; and

f. provide clear justification, through the submission of a heritage statement, for any works that could harm a heritage asset yet be of wider substantial public benefit, through detailed analysis of the asset and the proposal.

Proposals will not be supported where the harm caused as a result of the impact of a proposed scheme is not justified by the public benefits that would be provided.

Where a planning proposal affects a heritage asset, it must be accompanied by a Heritage Statement identifying, as a minimum, the significance of the asset, and an assessment of the impact of the proposal on the heritage asset. The level of detail of the Heritage Statement should be proportionate to the importance of the asset, the works proposed and sufficient to understand the potential impact of the proposal on the significance and/or setting of the asset.

**9.3** Historic England recognises that neighbourhood plans provide an opportunity for a community to develop a positive strategy for the area's locally important heritage assets that aren't recognised at a national level through listing or scheduling. These are known as non-designated heritage assets. The NPPF explains that the significance of a non-designated heritage asset should be taken into account in the determination of any planning application. The preparation of the Neighbourhood Plan has identified a number of buildings and structures in the village that are of local significance which, while not yet formally designated as 'Local Heritage Assets, make a significant contribution to the historic environment and character of Reach and may be worthy of being protected. This is especially the case around Fair Green where, while being recognised as a Conservation Area, the combination of buildings, even those that are not Listed, makes the area so distinct. In 1972 the then Her Majesty's Stationery Office published "The Royal Commission on Historical Monuments of England survey of North-East Cambridgeshire" which includes records for Reach. It identified buildings and archaeological features of importance in the village, many of which were subsequently Listed although many were not.

- Many of the 17C to 19C houses around Fair Green and on Great Lane that are not listed. It is the combination of styles and materials that makes such a positive addition to the built environment.
- The Hythe the Catchwater Drain on either side of it, including associated earthworks mostly to the north and the basins to the south. The east limb is now silted up.
- The field to the north of the ruined arch in which housing platforms were visible until recently and where LIDAR returns suggest more basins associated with the eastern limb of the Catchwater.
- The Clunch Quarries. These are over 20ha in extent, reflect 800 years or so of industrial activity and contribute to an explanation of the village's and the Hythe's existence. Furthermore, they are the source of stone in the Lady Chapel, Ely Cathedral, many local churches and Cambridge colleges.
- Features in the field to the south east of Church Hill which may indicate the presence of a Bronze Age barrow and an iron Age enclosure.
- Furlong boundaries on either side of the Devil's Dyke. These predate the enclosure Act and may reflect Roman or Medieval farming activity.

9.4 A separate "Assessment of Buildings of Local Significance" (available on the Neighbourhood Plan pages of the village website) has been undertaken to identify buildings which are important to the community and should be taken into account when considering development proposals. Their designation as Buildings of Local Interest by East Cambridgeshire District Council will be pursued and, in the meantime, we have described their significance in Appendix 3 and they are also identified on the Policies Map.

9.5 Whilst designation as Buildings of Local Interest provides no additional planning controls, the fact that a building or site is on a local list means that its conservation as a heritage asset is an objective of the NPPF and a material consideration when determining the outcome of a planning application.

## POLICY RCH10 - BUILDINGS OF LOCAL SIGNIFICANCE

Development proposals should ensure that the retention and protection of local heritage assets and buildings of local significance, including buildings, structures, features, and gardens of local interest, are appropriately secured.

Appendix 3 identifies the Buildings of Local Significance and their locations are identified on the Policies Map.

Proposals for any works that would lead to the loss of, or substantial harm to, a building of local significance should be supported by an appropriate analysis of the significance of the asset to enable a balanced judgement to be made having regard to the scale of any harm or loss and the significance of the heritage asset.

## COMMUNITY ACTION 1 - LOCAL HERITAGE ASSETS

The formal designation of the identified Buildings of Local Significance as Local Heritage Assets by East Cambridgeshire District Council will be pursued.

**We live in a flat open landscape with few trees containing a high density of sites of historic and archaeological significance. Much of our neighbourhood forms part of the National Trust's Vision Area reflecting its national and regional value for conservation and recreation.**

Reach Survey 2020

# 10 SUSTAINABLE DEVELOPMENT AND DESIGN

**Development Design Objectives**

9. Have a positive effect on the environment, by promoting actions that contribute to mitigating the Climate Crisis and reducing the carbon footprint.
10. Influence and guide suitable designs of new developments within the Parish.

**10.1** As part of the government-funded Neighbourhood Planning Technical Support package, design guidelines have been prepared by AECOM Consultants (Reach Design Code). The guidelines are published as supporting evidence to the Neighbourhood Plan and should be used to inform the design that any future development should follow to retain and protect the rural, tranquil nature and scenic beauty of the area. Supporting this overall objective are a number of principles which, where appropriate to the development, proposals in the Neighbourhood Plan Area should have regard.

**10.2** The Design Codes set out a number of principles that should be present on development proposals, as set out below:

1. Integrate with existing paths, roads, circulation networks and patterns of activity.
2. Reinforce or enhance the established village character of roads and lanes, greens, and other spaces.
3. Respect the rural character of views and gaps.
4. Harmonise and enhance existing settlement in terms of physical form, architecture and land use.
5. Relate well to local topography and landscape features, including prominent ridge lines and long-distance views.
6. Reflect, respect and reinforce local architecture and historic distinctiveness.
7. Retain and incorporate important existing features into the development.
8. Respect surrounding buildings in terms of scale, height, form and massing.
9. Adopt contextually appropriate materials and details.
10. Provide adequate open space for the development in terms of both quantity and quality.
11. Incorporate necessary services and drainage infrastructure without causing unacceptable harm to retained features.
12. Ensure all components e.g. buildings, landscapes, access routes, parking and open space are well related to each other.
13. Make sufficient provision for sustainable waste management (including facilities for kerbside collection, waste separation and minimisation where appropriate) without adverse impact on the street scene, the local landscape or the amenities of neighbours.
14. Positively integrate energy efficient technologies.

**10.3** The Design Codes provide a development design checklist which development proposals should seek to respond to. The checklist is attached as Appendix 4 of the Plan.

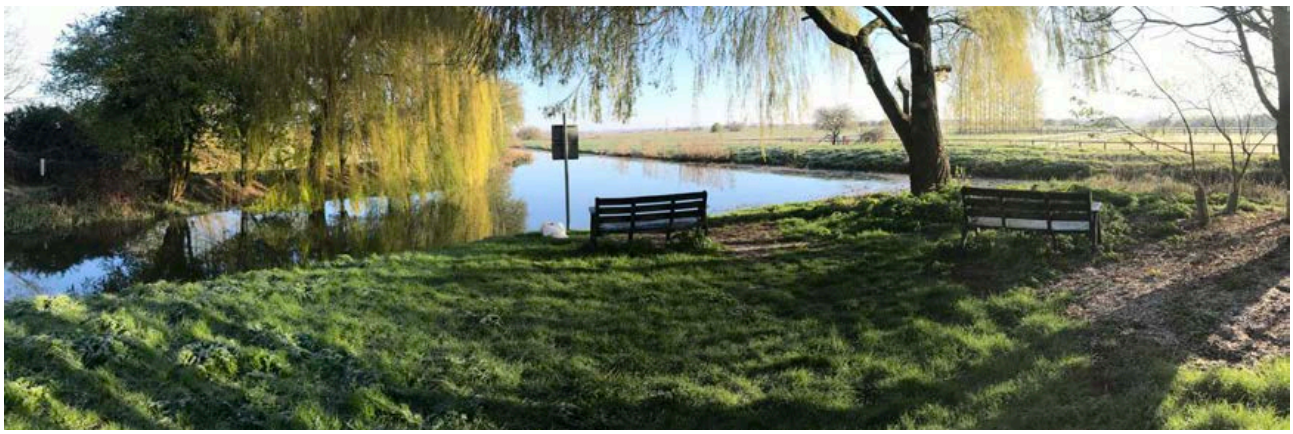
## POLICY RCH11 - DESIGN CONSIDERATIONS

Proposals for new development must reflect the local characteristics and circumstances in the Neighbourhood Plan Area and create and contribute to a high quality, safe and sustainable environment.

Planning applications should demonstrate how they satisfy the requirements of the Development Design Checklist in Appendix 4 of the Neighbourhood Plan, as appropriate to the proposal.

In addition, and as appropriate to their scale nature and location development proposals should be designed so that they:

a. recognise and address the key features, village gateways, characteristics, landscape/building character, local distinctiveness and special qualities of the area and, where necessary, prepare a landscape character appraisal to demonstrate this;
b. do not involve the loss of gardens, important open, green or landscaped areas, which make a significant contribution to the character and appearance of that part of the village;
c. taking mitigation measures into account, do not unacceptably affect:
    i. any historic, architectural or archaeological heritage assets of the site and its surroundings, including those identified Buildings of Local Significance and the Listed Buildings set out in Appendices 2 and 3
    ii. important landscape characteristics including trees and ancient hedgerows and other prominent topographical features;
    iii. identified important views into, out of, or within the village as identified on the Policies Map;
    iv. sites, habitats, species and features of ecological interest;
    v. the amenities of adjacent areas by reason of noise, smell, vibration, overlooking, overshadowing, loss of light, other pollution (including light pollution), or volume or type of vehicular activity generated; and/or residential amenity;
d. do not locate sensitive development where its users and nearby residents would be unacceptably affected by noise, smell, vibration, or other forms of pollution from existing sources, unless adequate and appropriate mitigation can be implemented;
e. produce designs that respect the character, scale and density of the locality;
f. produce designs, in accordance with standards, that maintain or enhance the safety of the highway network ensuring that all vehicle parking is provided within the plot and seek always to ensure permeability through new housing areas, connecting any new development into the heart of the existing settlement;
g. wherever practicable, ensure that development faces on to existing roads;h
h. do not result in water run-off that would add to or create surface water flooding;
i. where appropriate, make adequate provision for the covered storage of all wheelie bins and cycle storage in accordance with adopted cycle parking standards;
j. include suitable ducting capable of accepting fibre to enable superfast broadband.



### Flooding

10.4 The fen area north-west of the village centre is within the highest risk area at risk of flooding from rivers and the sea (Zone 3 flood risk). The NPPF generally directs development away from areas at highest risk of development through a "sequential test". The aim of the sequential test is to steer new development to areas with the lowest risk of flooding. Development proposals will not be supported if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. In 2016 all Cambridgeshire districts adopted the Cambridgeshire Flood and Water Supplementary Planning Document (SPD). Development proposals should have regard to the content of the SPD and will be judged against its content unless it is superseded by more up-to-date policies at a national level or in the East Cambridgeshire Local Plan. The Future Fens – Flood Risk Management initiative also provides an important resource for what the future flood risk management choices for the Great Ouse Fens might look like. The Future Fens - Flood Risk Management initiative also provides an important resource for what the future flood risk management choices for the Great Ouse Fens might look like.

10.5 The risk of flooding from surface water is relatively low in the village centre when compared to many settlements. However, and notwithstanding the low risk, development proposals should be designed to incorporate measures that will not add to or create surface water flowing.

## POLICY RCH12 - MITIGATING THE RISK OF FLOODING FROM DEVELOPMENT

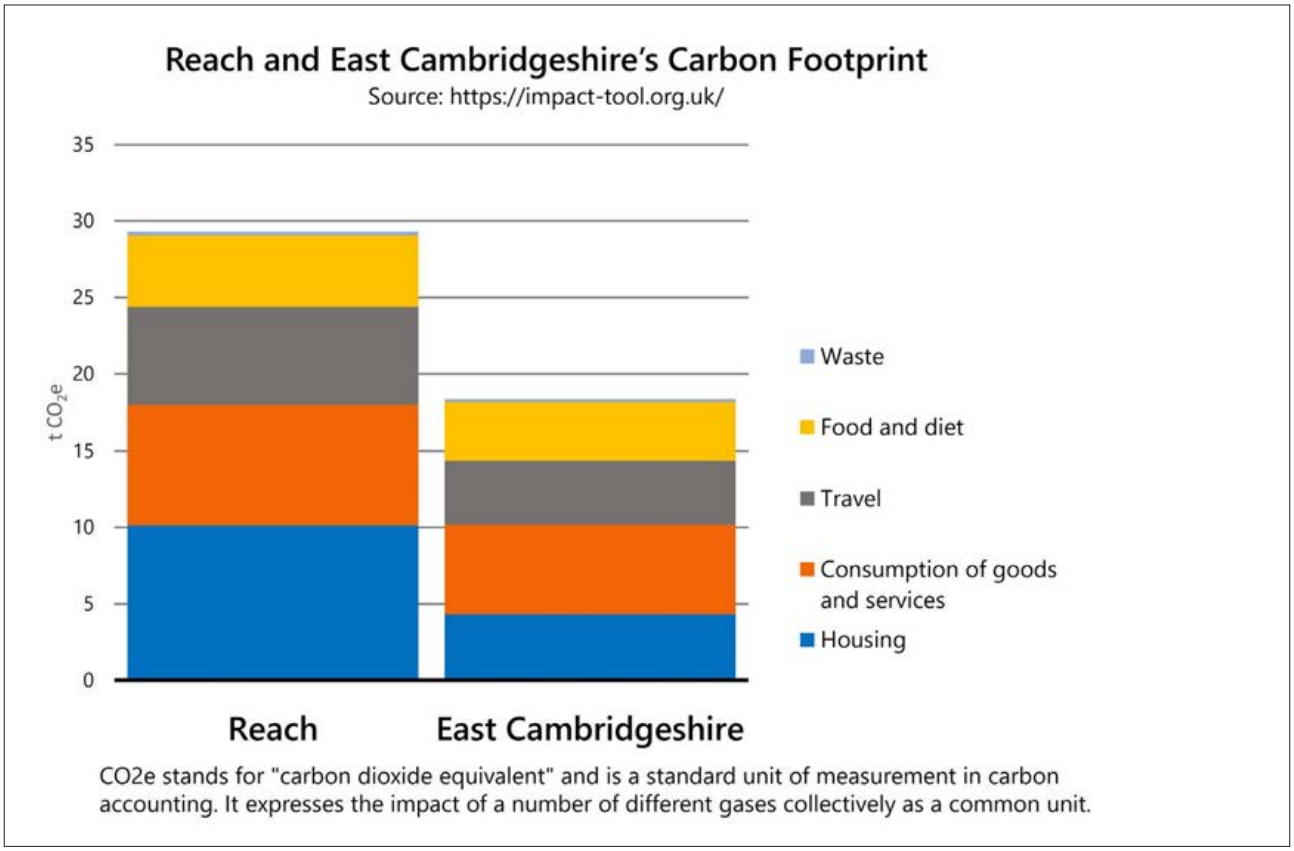
All development proposals involving new build and situated within those areas in the parish at risk from surface water flooding (as documented in the most up to date Strategic Flood Risk Assessment and Surface Water Management Plan) should be accompanied by a site-specific flood risk assessment.

Such development proposals should:

- be accompanied by a Surface Water Drainage Strategy;
- ensure all surface water is appropriately managed through the use of sustainable drainage systems and include detailed proposals for future maintenance of these; and
- be designed and constructed to reduce the overall level of surface flood risk to the use of the site and elsewhere when compared to the current use;

In all locations, sustainable drainage systems for the disposal of surface water should be incorporated into the design and layout of development proposals unless such an approach would be demonstrably unfeasible.

Sustainable drainage systems that benefit Reach's biodiversity and wildlife will be supported.




Reach's Carbon Footprint (Source https://impact-tool.org.uk/)

**10.6** The Centre for Sustainable Energy (CSE), has developed a community carbon calculator in response to a demand from smaller settlements to have robust and accurate data on their carbon footprint, so that they can best direct their efforts to tackle the climate emergency. For reach, it identifies that "land use, land-use change, and forestry" is the biggest source of $CO_2$.

**10.7** Energy consumption and the demand for energy is a major determinant of climate change. Where energy use is necessary, then priority should be given to utilising the most sustainable sources. Many energy-saving initiatives can be installed on homes within permitted development rights (when full planning permission is not required) but there may be occasions where schemes that do require planning permission could have a potential adverse impact on the character of the area and the amenity of nearby residents. Oil is the most frequently used heating source in the village but it is unsustainable and polluting in its production, shipping, distribution and use. In line with national government policy, the long-term aim should be to reduce the overall use of all fossil fuels – gas, oil and coal.

## POLICY RCH13 - SUSTAINABLE BUILDING

Proposals that incorporate latest best practice in energy conservation will be supported where such measures are an integral element of the design of the buildings and minimise any impacts on the buildings or their surroundings.

As appropriate to their scale, nature and location development proposals should:

a. maximise the benefits of solar gain in site layouts and orientation of buildings;
b. be designed to achieve maximum achievable energy efficiency using a fabric first approach to construction;
c. incorporate non fossil fuel-based heating systems;
d. incorporate sustainable design and construction measures and energy efficiency measures, such as, where feasible, ground/air source heat pumps, solar panels, thermal and PV systems; and
e. make provision for grey water/rainwater, and/or surface water harvesting and recycling.

Wherever practicable, development proposals on peat-based fen soils should consider and offset their carbon losses through the incorporation of commensurate carbon offsetting measures.

### Community Energy

**10.8** The Neighbourhood Plan Residents' Survey revealed a significant interest (86% of respondents) in the principle of a community energy scheme. Furthermore (81%) of respondents would consider replacing their current system with a more up-to-date system based on renewable electricity.

**10.9** The receptiveness to greener sources of domestic energy is unsurprising given respondents' views elsewhere in the survey about reducing their carbon footprint and the village's current heavy dependence on fossil fuels. Approximately three quarters of households in Reach rely on oil as their main source of heat and only a very small proportion of homes draw on renewables to assist in heating and hot water.

### Reach Energy Group (REG)

**10.10** As part of the NP project, REG was set up to look into green energy options the village, and in particular, to examine the feasibility of a community scheme to provide low carbon energy for the entire village, drawing on the experience of Swaffham Prior, our neighbouring community. Investigations have yet to identify a technical solution that is appropriate and cost-effective for Reach.

**10.11** REG's work has arguably increased the uptake of greener energy options by individual households aided to a degree by the Government's current Green Homes Grant package. REG will continue to monitor and evaluate evolving technology, the impact of the Green Homes Grant, the take up of greener energy options and the outstanding need of renewable energy in Reach. It will aim to identify and encourage schemes appropriate for Reach's circumstances.

## COMMUNITY ACTION 2 – COMMUNITY ENERGY SCHEME

Given the economies of scale and environmental benefits likely to arise from a collective approach, the delivery of a community energy scheme will continue to be explored to identify a solution that is appropriate and cost-effective.

## POLICY RCH 14 - COMMUNITY ENERGY PROPOSALS

Proposals for community led renewable energy initiatives, especially those providing a long-term source of income for the community and reducing bills by enabling local supply, will be supported provided:

- The energy generating infrastructure is located as close as practicable to existing buildings and or the proposed development it is intended to serve; and
- The proposal is of a proportionate scale to its intended purpose; and
- The siting, scale and design of the energy generating infrastructure will not unacceptably affect the village in terms of visual impact on views, distinctive and archaeologically significant landscapes, listed buildings and on buildings of local significance and through the creation of noise, vibration, or electromagnetic interference.

### Dark Skies

10.12 There is currently minimal street lighting in Reach and any change could have a significant detrimental impact on the rural character of the village and add to light pollution. Paragraph 180 (c) of the NPPF states that planning policies and decisions should "limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation". Artificial lighting of development, while increasing a sense of security, can also impact upon residential amenity, the character and appearance of an area (particularly rural locations) and the environment. Aspects such as poor design, location or the expulsion of unnecessarily high levels of light can also have a harmful impact. When asked in the Village Survey, 75 percent of respondents consider Dark Skies to be an asset to the village. Policy RCH15 seeks to address this important issue. Plainly the policy will need to be applied in a flexible way and take account of highway safety issues, the needs of specific applicants, and security.

## POLICY RCH15 - DARK SKIES

Wherever practicable, development proposals should not incorporate external lighting.

Any required external lighting systems should be designed to reduce the consumption of energy by promoting efficient outdoor lighting technologies, keeping the night-time skies dark and reducing glare. The details of lighting schemes should minimise their impact on the environment, light pollution, and any effects on wildlife.

# 11 INFRASTRUCTURE AND SERVICES

**Infrastructure and services objectives**

11. Retain existing facilities and encourage the provision of new services and facilities.
12. Ensure that the essential infrastructure including highways is maintained and, where necessary, improved.

**11.1** The village currently has very little in the way of services and facilities and can be listed as:

- The Parish Church
- The Village Hall
- The Dykes End Public House
- The Playing Field including tennis court and play equipment
- The Allotments
- Cricket Pitch
- The Menage
- The Prospects Trust Farm Shop
- The bird hide on National Trust land at Tubney Mere

**11.2** The likelihood of additional services being provided, such as a village shop, appears remote and support was not evidenced in the Residents' Survey. However, additional provision will be especially welcomed if it does not have a detrimental impact on the environment and highways. It is also vital that services and facilities are protected and enhanced for the use of current and future residents.

**11.3** In some instances, the loss of a service might have a significant detrimental impact on the settlement and its sustainability. The 'Assets of Community Value' / 'Community Right to Bid' scheme was introduced by the government in the Localism Act 2011 and came into force in September 2012. The aim was to give community groups time to make realistic bids to buy land or buildings that are of importance to the local community when they come up for sale. Under the Community Right to Bid, community groups are able to nominate non-residential buildings or land within their area as 'assets of community value' which cannot be sold without the community group being given the opportunity to put together a bid to purchase the asset. A building or other land is an asset of community value if its main use has recently been, or is presently used, to further the social wellbeing or social interests of the local community and could do so in the future. The Localism Act 2011 states that 'social interests' include cultural, recreational and sporting interests.

## POLICY RCH16 - PROTECTING EXISTING SERVICES AND FACILITIES

Proposals that would result in the loss of valued facilities or services which support the local community (or premises last used for such purposes) will only be supported where:

a. it can be demonstrated that the current use is not economically viable and is not likely to become viable. Supporting financial evidence should be provided including any efforts to advertise the premises for sale for a minimum of 12 months; and
b. it can be demonstrated, through evidenced research, that there is no local demand for the use and that the building/site is not needed for any alternative social, community or leisure use; or
c. alternative facilities and services are available, or replacement provision is made, of at least equivalent standard, in a location that is accessible to the community it serves with good access by public transport or by cycling or walking.

11.4 The relatively recently completed provision of the Cricket Pitch and Menage has made an important contribution to recreation facilities in the village. The further enhancement of these or the provision of further sport and recreation facilities in Reach will be supported subject to careful consideration and mitigation of any impacts that the proposal might cause.

## POLICY RCH17 - OPEN SPACE, SPORT AND RECREATION FACILITIES

Development proposals for the provision of new sports and recreation open spaces and for enhancement and/ or expansion of existing amenity, sport or recreation open space or facilities (as shown on the Policies Map) will be supported where they comply with other development plan policies.

Development proposals which will result in the loss of existing amenity, sport or recreation open space or facilities will not be supported unless:

a. it can be demonstrated that the space or facility is surplus to requirement against the local planning authority's standards for the particular location, and the proposed loss will not result in a likely shortfall during the plan period; or

b. replacement for the space or facilities lost is made available, of at least equivalent quantity and quality, and in a suitable location to meet the needs of users of the existing space or facility.

Any replacement provision should take account of the needs of village, and the current standards of open space and sports facility provision adopted by the local planning authority.

# 12 TRAVEL

### Travel Objectives

13. Minimise the impact of the motor vehicle on the village.
14. Improve opportunities for non-motorised travel within and out of the parish.

**12.1** The village has a poor transport network not helped by its narrow roads. The nature of its position between the villages of Burwell and Swaffham Prior can result in motorists using the village centre as a 'rat run' rather than using the busy main road during rush hours.

### Public Transport

**12.2** The local bus service is sparse but does provide infrequent trips to Cambridge, Burwell, Newmarket and Bury St Edmunds. There is some provision for private transport to localities such as Burwell surgery. School buses are provided for children attending Swaffham Prior Primary School and Bottisham Village College.

**12.3** Students attending further education colleges in Cambridge use service buses but these stop running at 19.15 (Cambridge to Reach) and 18.23 (Reach to Cambridge) curtailing leisure activities. It is not known if Stagecoach plan to change the timetable; the company says so many journeys are made by customers with passes that routes such as those which service Reach run at a loss. There are taxi services in the nearby village of Burwell.

### Cycling

**12.4** The village is on the SUSTRANS National Cycle Network (Route 51) and is a popular destination or cyclists. There are also a number of byways in the parish that allow for off-road cycling, particularly along Straight Drove towards Upware or along Barston Drove and Black Droveway. The strength of village opinion for vehicle free routes to Burwell and Swaffham Prior was revealed in the residents' survey. 80% of respondents thought it 'very important'. A Reach to Burwell greenway has been listed by Cambridgeshire County Council.

### Walking

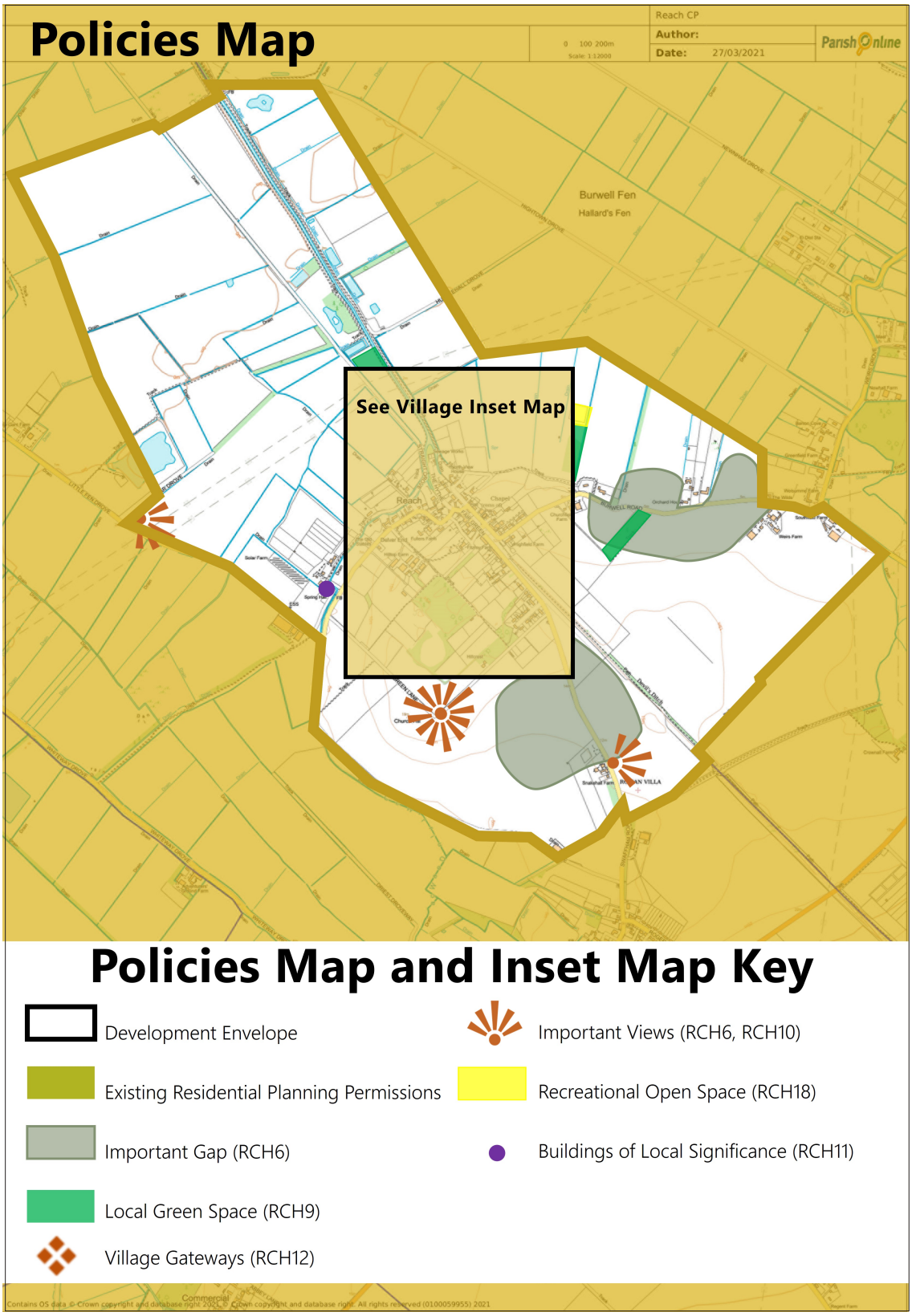
**12.5** Reach is strategically located at one end of the Devils Dyke providing a continuous vehicle-free route from Wicken to Woodditton via Reach.

### Car parking

**12.6** There is a small car park in the village providing parking for the playground, football pitch and tennis court otherwise most parking is street parking and when necessary parking on Fair Green (inadvisable in winter months). A new playground has recently been installed which has proved popular with visitors to the village. This and the limited parking at the village pub has increased roadside parking noticeably.

### POLICY RCH18 - NEW VEHICLE-FREE ROUTES

Proposals that deliver new or improved vehicle-free walking, cycling and equestrian routes to neighbouring villages, or as part of a wider network of provision, will be supported.


Policies Map
Reach CP
Author:
Date: 27/03/2021
Parish Online
Burwell Fen
Hallard's Fen
See Village Inset Map
Reach
Policies Map and Inset Map Key
Development Envelope
Existing Residential Planning Permissions
Important Gap (RCH6)
Local Green Space (RCH9)
Village Gateways (RCH12)
Important Views (RCH6, RCH10)
Recreational Open Space (RCH18)
Buildings of Local Significance (RCH11)
Commercial
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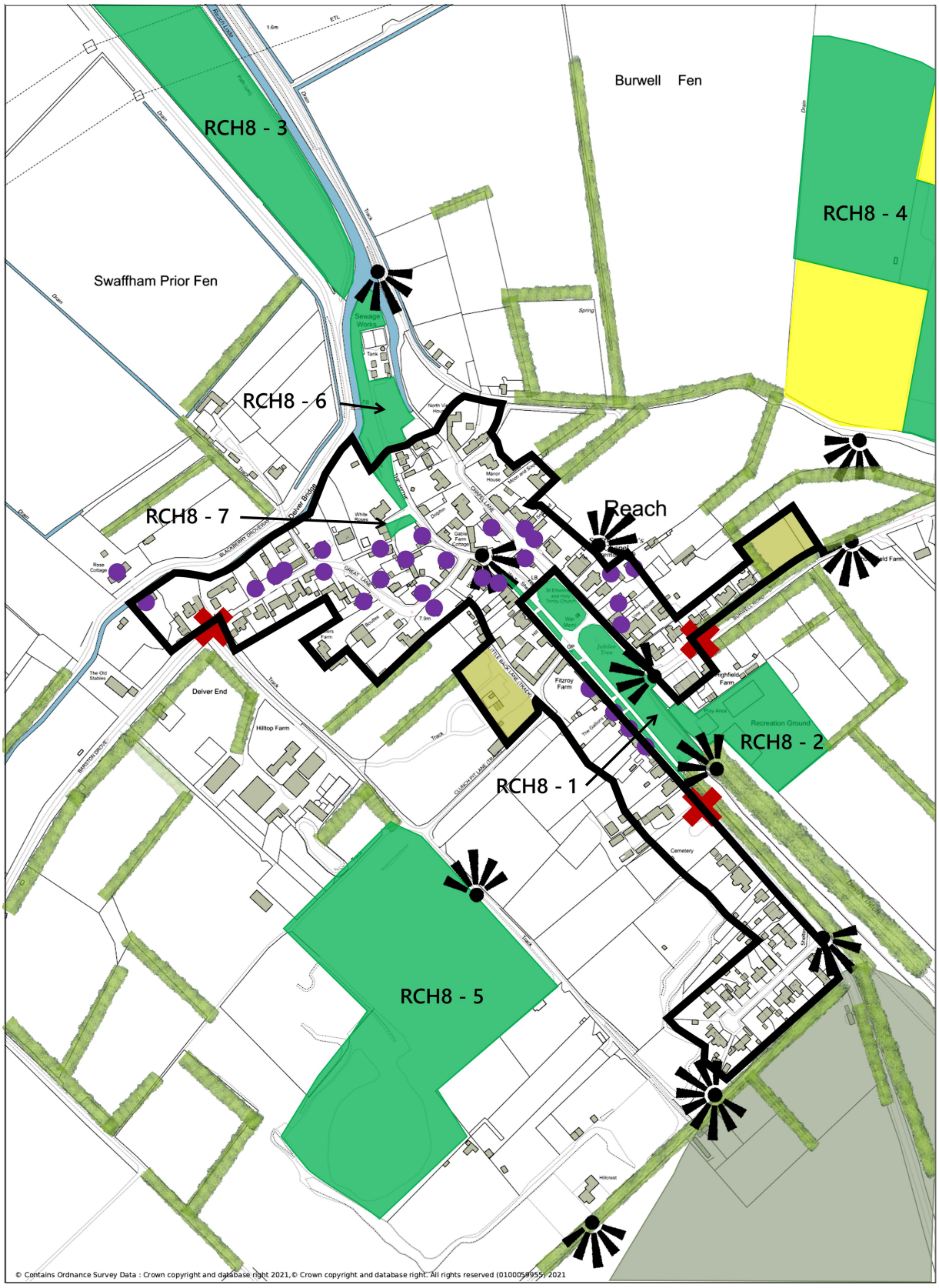
# INSET MAP


RCH8 - 3
Burwell Fen
RCH8 - 4
Swaffham Prior Fen
RCH8 - 6
RCH8 - 7
Reach
RCH8 - 2
RCH8 - 1
RCH8 - 5
Delver End
Hilltop Farm
Recreation Ground
Cemetery
© Contains Ordnance Survey Data : Crown copyright and database right 2021,© Crown copyright and database right. All rights reserved (0100059955) 2021

# APPENDIX 1 -
## Housing permissions not completed as at 1 February 2021

| Site | Proposal | Application Ref | Dwellings |
|---|---|---|---|
| Land East of 27 Burwell Road | 1 x four bedroom, 1.5 storey timber-frame detached dwelling with detached double garage | 20/01415/FUL | 1 |
| Southwest of Hill Farm, Fair Green | Demolition of existing agricultural buildings, construction of two detached bungalows, associated parking and infrastructure | 18/01397/OUT | 2 |
| Land to East of Orchard Cottage, 11 Chapel Lane | Construction of one and half storey detached dwelling with new access | 19/01439/FUL | 1 |
| Churchfield Farm Burwell Road | Change of use of agricultural building to a dwelling | 16/00833/ARN | 1 |
| Land Opposite 20 Burwell Road | Erection of 3 dwellings | 17/00967/OUT | 3 |
| | | **Total** | **8** |

# APPENDIX 2- HERITAGE ASSETS

## Reproduced from Historic England's register of Listed Buildings - February 2021

The buildings and features below are currently identified on Historic England's statutory registry of listed buildings and monuments. The addresses are as recorded on the register and, where necessary, the locally recognised address is stated in square brackets.

### Scheduled Monuments

Devil's Ditch [Dyke], Reach to Woodditton
Roman villa and Iron Age settlement N of Reach Bridge

### Grade II Listed Buildings

Moon and Sixpence, Chapel Lane
Market Cross, Fair Green
Barn to north of Fullers Farmhouse, Great Lane
The Post Office High Street [17 Fair Green]
22 and 23 High Street [22 and 23 Fair Green]
Hill Farmhouse, 28 High Street [28 Fair Green]
Manor House, Chapel Lane
Parish Church of St Ethelreda, High Street [Fair Green]
Myster House, High Street [Fair Green]
24 High Street [24 Fair Green]
K6 Telephone Kiosk, Fair Green
White Roses, The Hythe
21 Great Lane
War Memorial, Fair Green

# APPENDIX 3 - BUILDINGS OF LOCAL SIGNIFICANCE

A separate "Assessment of Buildings of Local Significance" (available on the Neighbourhood Plan pages of the village website) has been undertaken to identify buildings which are important to the community and should be taken into account when considering development proposals. This appendix briefly describes the buildings that are identified in Policy RCH10 and identified on the Policies Map.

### 1 - Chapel of St John

A medieval chapel, possibly the chapel of St. John to which bequests were made in the early 16th century to a chapel at Reach. The chapel is the earliest known standing building in the village. It is very likely to be part of the medieval settlement of East Reach. Its west end will have been destroyed during the construction of the church, but the eastern half is likely to have survived below ground.

### 2 - 15 Fair Green

A 17th century two storey house with timber-framing and tiled gabled roof, standing at right angles to the street. The property lies between the rampart of Devils Dyke (still standing here until the mid-18th century) and the early settlement of East Reach to which the property belonged.

### 3 - Water Hall Cottage

A 17th century house with one storey and attics, clunch walls (perhaps replacing timber-framing) and tiled roof. Its position suggests that it is a survivor of denser settlement along the catchwater drain and basins associated with basins. As such, the property is likely to have evidence of wharfage and trade along the catchwater drain.

### 4 - 21 Fair Green

A late 18th century house of two storeys with clunch and red brick walls, and pantiled, gabled roof. Inside, the cross beams are either chamfered or cased. Originally a single dwelling on a large plot as shown on the 1805 map, at some point it has been divided up into at least 3 dwellings. The property is the northernmost of a terrace of similar buildings. As a group they are among the most attractive and distinctive on Fair Green.

### 5 - 8 Swaffham Road

House with two storeys with clunch walls faced in red brick except on the back. It has a gabled roof with pantiles. The southern part is an early 18th century single story building which had its walls raised at the beginning of the 19th century. Group value.

### 6 - 3/5 The Hythe

No.3 is a two storey brick and clunch house with slate roof and cellar lined with clunch. It was originally two smaller workers houses, combined between 1886 and 1921. It was a shop and farmhouse to the yard behind by the late 19th century. No.5 is a brick and clunch house with a slate roof. It was originally two small 19th century workers houses.

### 7 - Snib End, 2 Chapel Lane

Late 18th century house with two storeys, rendered brick with dentilled eaves course and slated gabled roofs with parapets. It stands at right angles to the street. Elements of the brick frontage and changes in the clunch work on its south wall suggest that it may have originally been a clunch-built one storey and attic building in the 18th century.

### 8 - Prospect House, 38 Great Lane

A brick and clunch house with a slate roof now rendered and painted. The central window on the frontage is perhaps the original front door. The original building was built of clunch in the 18th century and was substantially changed during the 19th. The house lies on the frontage of a large plot running down to the catchwater drain.

### 9 - The Dykes End PH and The Barn, 9A, 9B & 9C Fair Green

An early 19th century village farm represented by its surviving clunch barn to the rear and The Dykes End pub which was originally the farmhouse. The clunch-built barn shows on the 1800 enclosure map, set back from the road with two properties on the frontage.

The Dykes End pub is of white brick, two storeys with a slate roof. With its white frontage and front garden it is perhaps the most iconic element in the village landscape, occupying the central position on the green.

### 10 - Fitzroy Farm

An early 19th century house of two storeys, white brick (now painted) and pantiled gabled roof. In the early 20th century the southern part of the house was the house used to extend No 31, a small house next door. Before this, Fitzroy farm was a much more substantial building with steeper pitched, a central chimney stack and a central entrance (now replaced by a bay window).

### 11 - Spring Hall Farm

A 19th century farmhouse house of two storeys, built of local stone with a hipped slate roof. It is built to the north of the catchwater drain and Blackberry Drove. The frontage has a central entry with symmetrical sash windows.

### 12 - Rose Cottage

A 19th century house in local brick with a modern gabled roof. Only surviving 19th century workers house north of the catchwater drain. Group value with 36, 40 and 42 Great Lane.

### 13 - 40 and 42 Great Lane
A pair of back-to-back late 19th century houses in local brick with a hipped slate roof built at right angles to the road. A date plaque of 1871 is high on the roadside wall. Group value with 36 Great Lane and Rose Cottage.

### 14 - 36 Great Lane
A 19th century house in local brick with a pantile roof. Group value with 40 and 42 Great Lane and Rose Cottage.

### 15 - Delph End Cottage
A 19th century house in local brick and clunch with a slate roof. It was originally two workers houses with a lean-to on each side.

### 16 - Tigh an Righ
A house in local brick-built side on to Little Lane. The western part is a modern extension, but the rest is a complex sequence of earlier, 19th century houses, possibly facing into a shared plot to the south.

### 17 - 17 Great Lane
A 19th century house in white painted clunch and brick with a slate roof. The original buildings were probably agricultural, but the building sequence is not clear.

### 18 - 16 Great Lane
A 19th century house in rendered and white painted clunch and brick with a pantile roof. The original building was a pair of semi-detached two workers houses, gable end to the road.

### 19 - Ivy End Cottage and 14 Great Lane
A pair of 19th century semi-detached houses. Ivy End Cottage has been extended to the west but retains its original frontage. Its neighbour has been extended to the rear and now has its entry off Great Lane.

### 20 - 6 and 8 Great Lane
A pair of 19th century workers houses in local brick with a pantile roof. A modern extension has been added on the east end.

### 21 - 5 Great Lane
A pair of 19th century workers houses in local brick with a pantile roof, now combined into one dwelling. Originally two houses, the right-hand door is now blocked. The left house was Reach Post Office in the 1920s. In 1886 it shared a yard and well with another pair of houses, now demolished.

### 22 - 16 Fair Green
An early 19th century house of two storeys with brick walls and slate gabled roof, early 19th century. The only property on the village green, it was originally a pair of semi-detached houses, perhaps built as a pair of workers cottages.

### 23 - 20 Fair Green
A 19th century house in local brick and clunch with a hipped slate roof built at right angles to the road. It was originally two dwellings within the property of 21 Fair Green.

### 24 - Congregationalist Chapel
In 1863, increasing congregations raised money to build the present chapel which could seat up to 350 people. Normally linked from the 1860s to Burwell Congregationalist chapel, the Reach chapel remained in use until its closure c. 1963. The partly derelict building was sold in 1968 and is now partially converted into a dwelling.

### 25 - 2 Swaffham Road
An early 19th century one storey and attic house with side and back walls of clunch, and font wall and dressings of brick. The building was originally two dwellings, the southern being smaller but with an extension to the rear.

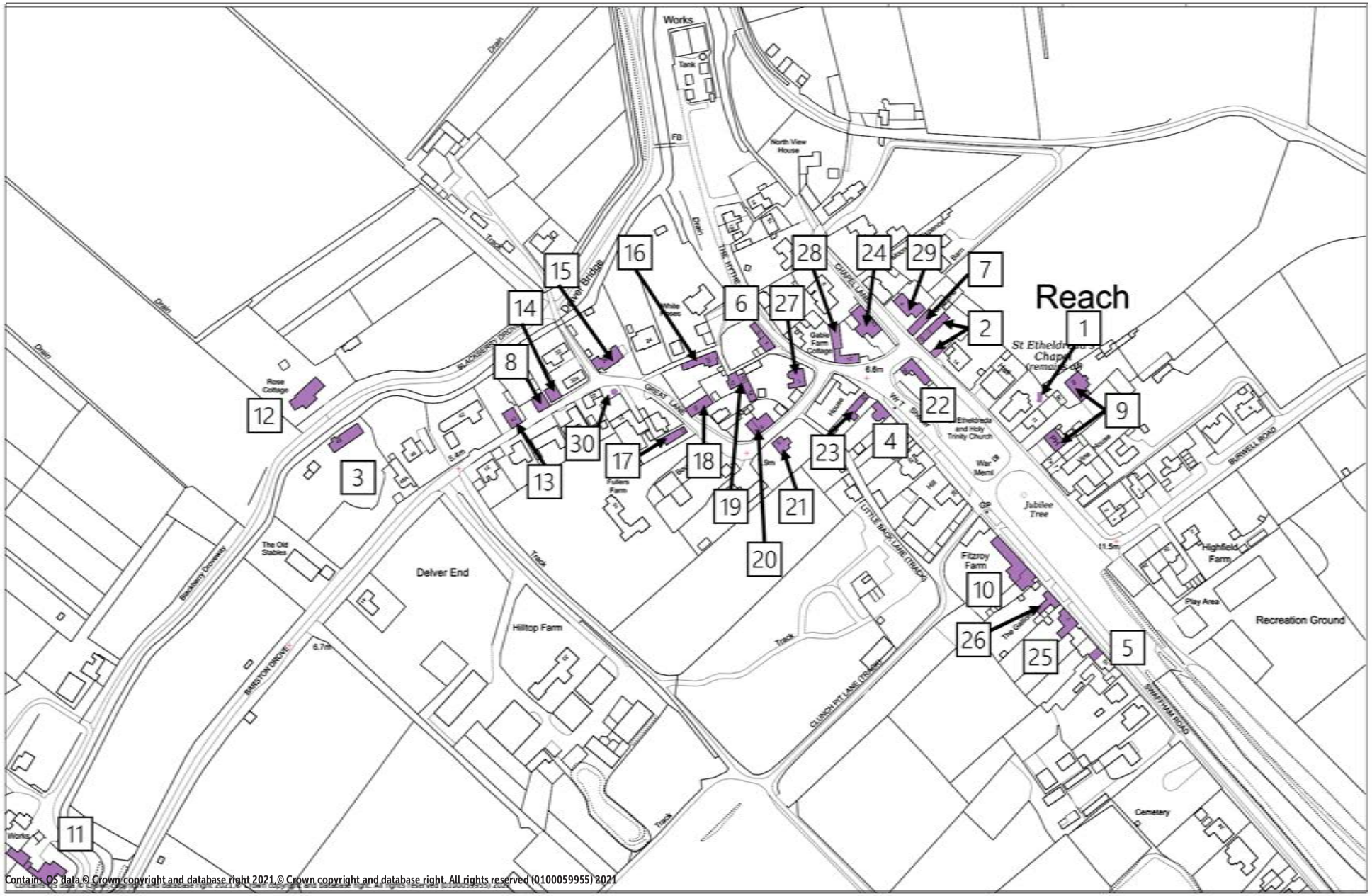
### 26 - Gallions
A 19th century house built in local brick with a pantile roof. Group value.

### 27 - Bull Cottage
A 19th century house with local brick on the frontage but mixed red brick on the side.

### 28 - Gable Farm House
In 18th century two storey house of brick and clunch, with a central chimney and pantile roof. Originally one storey and attic with dormer windows, the eaves were raised to create a second story in the 20th century, leaving its dentil cornice to reveal its old roof line.

### 29 - Chapel Farmhouse
A mid-19th century house of two storeys, built of white brick with slate roof. Its frontage is well preserved. It was the farmhouse for a village farm originally on a plot which included the now converted barn to the rear of Moon and Sixpence.

### 30 - Victorian Water Pump, east of 23 Great Lane




Buildings of Local Significance

# APPENDIX 4 - DEVELOPMENT DESIGN CHECKLIST

Source: Reach Neighbourhood Plan Design Code– AECOM May 2019
The table below identifies a general design principle followed by a number of questions against which the design proposal should be judged.

| Street grid and layout |
|---|
| Does it favour accessibility and connectivity over cul-de-sac models? If not, why? |
| Do the new points of access and street layout have regard for all users of the development; in particular pedestrians, cyclists and those with disabilities? |
| What are the essential characteristics of the existing street pattern; are these reflected in the proposal? |
| How will the new design or extension integrate with the existing street arrangement? |
| Are the new points of access appropriate in terms of patterns of movement? |
| Do the points of access conform to the statutory technical requirements? |
| |
| **Local green spaces, views and character** |
| What are the particular characteristics of this area which have been taken into account in the design; i.e. what are the landscape qualities of the area? |
| Does the proposal maintain or enhance any identified views or views in general? |
| How does the proposal affect the trees on or adjacent to the site? |
| Has the proposal been considered within its wider physical context? |
| Has the impact on the landscape quality of the area been taken into account? |
| How does the proposal affect the character of a rural location? |
| How does the proposal impact on existing views which are important to the area and how are these views incorporated in the design? |
| Can any new views be created? |
| Is there adequate amenity space for the development? |
| Does the new development respect and enhance existing amenity space? |
| Have opportunities for enhancing existing amenity spaces been explored? |
| Will any communal amenity space be created? If so, how this will be used by the new owners and how will it be managed? |
| |
| **Gateway and access features** |
| What is the arrival point, how is it designed? |
| Does the proposal maintain or enhance the existing gaps between settlements? |
| Does the proposal affect or change the setting of a listed building or listed landscape? |
| Is the landscaping to be hard or soft? |

| Buildings layout and grouping |
|---|
| What are the typical groupings of buildings? |
| How have the existing groupings been reflected in the proposal? |
| Are proposed groups of buildings offering variety and texture to the townscape? |
| What effect would the proposal have on the streetscape? |
| Does the proposal maintain the character of dwelling clusters stemming from the main road? |
| Does the proposal overlook any adjacent properties or gardens? How is this mitigated? |
| |
| **Building line and boundary treatment** |
| What are the characteristics of the building line? |
| How has the building line been respected in the proposals? |
| Has the appropriateness of the boundary treatments been considered in the context of the site? |
| |
| **Building heights and roofline** |
| What are the characteristics of the roofline? |
| Have the proposals paid careful attention to height, form, massing and scale? |
| If a higher than average building(s) is proposed, what would be the reason for making the development higher? |
| |
| **Household extensions** |
| Does the proposed design respect the character of the area and the immediate neighbourhood, and does it have an adverse impact on neighbouring properties in relation to privacy, overbearing or overshadowing impact? |
| Is the roof form of the extension appropriate to the original dwelling (considering angle of pitch)? |
| Do the proposed materials match those of the existing dwelling? |
| In case of side extension, does it retain important gaps within the street scene and avoid a 'terracing effect'? |
| Are there any proposed dormer roof extensions set within the roof slope? |
| Do the proposed extension respond to the existing pattern of window and door openings? |
| Is the side extension set back from the front of the house? |
| |
| **Building materials and surface treatment** |
| What is the distinctive material in the area, if any? |
| Does the proposed material harmonise with the local materials? |
| Does the proposal use high-quality materials? |
| Have the details of the windows, doors, eaves and roof details been addressed in the context of the overall design |
| Does the new proposed materials respect or enhance the existing area or adversely change its character? |
| |
| **Car parking solutions** |
| What parking solutions have been considered? |
| Are the car spaces located and arranged in a way that is not dominant or detrimental to the sense of place? |

| |
|---|
| Has planting been considered to soften the presence of cars? |
| Does the proposed car parking compromise the amenity of adjoining properties? |
| Have the needs of wheelchair users been considered? |
| Do new parking spaces integrate electric vehicle charging technology? Can existing parking spaces be retrofitted with electric vehicle charging points? |
| |
| **Architectural details and contemporary design** |
| If the proposal is within a conservation area, how are the characteristics reflected in the design? |
| Does the proposal harmonise with the adjacent properties? This means that it follows the height massing and general proportions of adjacent buildings and how it takes cues from materials and other physical characteristics. |
| Does the proposal maintain or enhance the existing landscape features? |
| Has the local architectural character and precedent been demonstrated in the proposals? |
| If the proposal is a contemporary design, are the details and materials of a sufficiently high enough quality and does it relate specifically to the architectural characteristics and scale of the site? |

Reach for the Future
The Reach Neighbourhood Plan

FEBRUARY 2024
Reach ParishCouncil

# Reach Neighbourhood Plan

Made Version

South Cambridgeshire Hall
Cambourne Business Park
Cambourne
Cambridge,
CB23 6EA
**www.scambs.gov.uk**

South Cambridgeshire District Council

**PINS Reference: EN010165**
**Contact (DCO Lead): Claire Shannon**
[redacted]

14th January 2025

KingswaySolar@planninginspectorate.gov.uk
***Electronic submission only***

Dear Sir / Madam

**Application by Kingsway Solar Farm Limited / Downing Renewable Developments for an Order Granting Development Consent for the Kingsway Solar Project (PINS ref: EN010165): – EIA Scoping Report Response**

**Introduction**

1. I am writing on behalf of South Cambridgeshire District Council in response to the EIA Scoping consultation request issued by the Planning Inspectorate (PINS) on the 17th of December for the Kingsway Solar Development Consent Order (DCO).

2. South Cambridgeshire District Council, herein referred to as 'SCDC' or 'the District Council,' has been advised that it is one of the host authorities for the DCO process along with Cambridgeshire County Council, herein referred to 'CCC' or the 'County Council' and East Cambridgeshire District Council (ECDC).

3. The Applicants, Kingsway Solar Farm Limited / Downing Renewable Developments have commissioned an Environmental Impact Assessment (EIA) Scoping Report, dated December 2024, in accordance with Regulations 10 and 11 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (hereafter referred to as the 'EIA Regulations').

**Engagement and Duty to Consult**

4. The Applicants undertook Phase One Non-Statutory Consultation (NSC 1) between October 31 and 12 December 2024 without engaging with or formally notifying SCDC, which left the District Council with very limited time to respond.

5. Due to the minimal information provided during NSC 1, SCDC anticipated that the EIA Scoping process would offer a more meaningful and comprehensive opportunity to discuss the proposal's technical impacts before submitting the scoping report to PINs. Unfortunately, this opportunity has not materialized. In its response to NSC 1, SCDC

strongly advised the Applicants to undertake meaningful pre-application engagement in advance of the EIA process. However, no such engagement has taken place.

6. Furthermore, SCDC had anticipated that the Scoping Request would be submitted after the Christmas period, in line with advice issued by PINS (Section 51 Advice Log, dated 13 November 2024). However, the Applicant submitted the Scoping Request to PINS on 17 December 2024 without any prior notification to the District Council.

**EIA Scoping Report**

7. Notwithstanding the above, the Council has reviewed the EIA Scoping Report and provided technical comments, as detailed in Table 1 appended to this letter. Key additional areas for scoping have been highlighted in the third column of the table.

8. Please note that there are numerous formatting errors and missing references, including repeated instances of "*Error! Bookmark not defined*," which are unacceptable. These errors have made the report difficult to navigate and understand. As a result, the District Council has again been unable to carry out the comprehensive review it strives to provide.

9. Additionally, the EIA Scoping Report does not read as a cohesive or comprehensive document. In particular, the report is difficult to interpret, as parts of it appear to have been based on a previous site plan where Parcel C was not included. Furthermore, the report seems to incorporate content from documentation for other NSIP solar farms. For instance, in section 4.11.6, the list of directions and distances of habitats from the solar farm suggests it was copied from the Sunnica (ref: EN010106) documentation.

10. The District Council raises concerns about whether the submitted EIA Scoping Report is adequate, complete, and compliant with the requirements outlined in Regulations 10 and 11 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. Nevertheless, the Council reserves the right to offer further comments on the scope of the Environmental Impact Assessment (EIA) in future submissions. This includes, but is not limited to, feedback on the Preliminary Environmental Information Report (PEIR) and other instances where insufficient information may have led to certain impacts being excluded from consideration. In such cases, the Council retains the right to challenge the adequacy of the EIA Scoping.

**Conclusion**

11. Notwithstanding the above, the Council has reviewed the Environmental Impact Assessment Scoping Report as submitted and provided technical comments as outlined in this letter and appended table. Please so note however that these

comments are made on a without prejudice basis, and the Council reserves the right to provide further additional comments on the Development Consent Order (DCO) application during the statutory consultation stages and at the Public Examination.

**Yours faithfully**

**Stephen Kelly**
**Director of Planning & Economic Development**
***On behalf of: South Cambridgeshire District Council***

Encl. Table 1: Response to EIA Scoping Report

# Application by Downing Renewable Developments for an Order Granting Development Consent for the Kingsway Solar Project (PINS ref: EN010165)

## TABLE 1: Response to EIA Scoping Report

| Paragraph | Background comments | Key additional areas for scoping |
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| **Major Accidents and Disasters – Section 5.6** | | |
| 5.6.7 | SCDC defer to Cambridgeshire County Council on this matter however SCDC wish to make the following comments from a public health perspective:<br><br>Air Quality and Major Accidents and Disasters<br><br>Paragraph 5.6.7 specifies that Major Accidents and Disasters as a risk to human health must be scoped into the EIA. While it is acknowledged that battery energy storage system (BESS) fires are rare, their potential consequences can be catastrophic, particularly due to the release of hydrogen fluoride vapour into the atmosphere and potential contamination of surface watercourses. This is especially critical given that the proposed site is located on a | Major Accidents and Disasters as a risk to human health must be scoped in to the EIA |

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| | principal chalk aquifer that serves the populations of Cambridgeshire and Suffolk. In light of the limited guidance currently available from Fire Services, this issue requires detailed examination and must be scoped into the EIA.<br>The Air Quality Assessment should also consider the potential worst-case scenario of a BESS fire and the resulting release of hydrogen fluoride vapour. The significant effects of such an event on air quality and human health must be included in the EIA for further assessment. | |
| | <u>Human Health and Vulnerable Sub-Groups</u><br><br>Referencing the Institute of Environmental Management and Assessment (IEMA) Guide to Determining Significance for Human Health in Environmental Impact Assessment, the EIA should:<br><br>• Include analysis of sub-groups of the population, rather than relying solely on generic health profiles.<br>• Explain how population health is likely to change over time, accounting for the relevant assessment years and project phases. This should address whether health outcomes might worsen or improve over time, particularly in scenarios of prolonged exposure.<br><br>Additionally, the assessment should provide parity between physical and mental health, considering biophysical, social, behavioural, economic, and institutional factors influencing population and human health outcomes. | |

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| **Mineral Assets and Waste – Section 5.7** | | |
| | SCDC would defer to Cambridgeshire County Council as the Minerals and Waste Local Planning Authority on this matter. | Defer to Cambridgeshire County Council as the Minerals and Waste Local Planning Authority on this matter. |
| **Human Health - Section 5.8** | | |
| Para 5.8.2 | Paragraph 5.8.2 of the EIA Scoping Report states that impacts on human health arising from changes to health determinants—such as access to open space and nature, active travel, community safety, and access to work and training—will be addressed through the findings of other assessments within the EIA process. | Air quality, landscape and visual amenity, noise and vibration, and traffic and transport should be scoped in.<br><br>Further details provided within this table under relevant sections. |
| 5.8.4 | <u>Disagreement with Paragraph 5.8.4</u><br><br>SCDC disagrees with the statement in Paragraph 5.8.4 that “any potential human health impacts would be captured by the aforementioned assessments and there are not expected to be any significant human health impacts outside of these assessments.” The mental health impacts of this proposal cannot be fully understood without a specific chapter or stand-alone assessment dedicated to this issue. Such an approach is recommended to comprehensively explore potential impacts and to identify appropriate mitigation measures. | The mental health impacts of this proposal should be scoped in. |
| | <u>Formatting Errors and Missing Information</u><br><br>Currently, topics such as air quality, landscape and visual amenity, noise and vibration, and traffic and transport are referred to in the EIA | |

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| | Scoping Report with the placeholder “Section Error! Reference Source not found.” This issue is repeated throughout the report and must be rectified to ensure clarity and consistency in the documentation. | |
| | Please see section **6.8. Population** for further comments. | |
| **Utilities – Section 5.9** | | |
| | Section 5.9 of the EIA Scoping Report which describes the proposed scope of assessment particularly referring to utilities such as water pipelines (supply and wastewater), telecoms cables, electrical cables, gas mains and drainage. SCDC defers to Cambridgeshire County Council as the Lead Local Flood Authority and to the Environment Agency on this matter. | Defers to Cambridgeshire County Council as the Lead Local Flood Authority and to the Environment Agency on this matter. |
| **Biodiversity and Habitats – Section 6.1** | | |
| Para 6.1.2 | <u>Reptiles</u><br><br>The assessment will focus solely on development areas. However, if reptiles require translocation off-site, the donor translocation site must also be assessed to ensure suitability and compliance with relevant guidelines. | Reptile impacts should be scoped in. |

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| | <u>Bat activity surveys</u><br><br>There are potential active bat corridors adjacent to the developable areas (roadways and water ways for example) these should be included within the activity surveys, particularly if new lighting is to be installed in these areas. | Bat activity should be scoped in. |
| | <u>Preliminary Bat Roost Assessments</u><br><br>The scope of the Preliminary Bat Roost Assessments should be extended to include a 50-metre buffer zone beyond the development boundary to account for any potential indirect impacts on bat roosts. | The scope of the Preliminary Bat Roost Assessments should be extended to include a 50-metre buffer zone beyond the development boundary. |
| | <u>Ground-Level Tree Assessments for Bats</u><br><br>The Ground-Level Tree Assessments for bats should also be extended to a 50-metre buffer zone beyond the development boundary, consistent with the recommendation for the Preliminary Bat Roost Assessments. | The scope of the Ground-Level Tree Assessments for bats should be extended to a 50-metre buffer zone beyond the development boundary. |
| | <u>Badger Surveys</u><br><br>Badger surveys should be extended to cover a 30-metre buffer zone outside the development boundary. This is particularly critical in areas where mammal trails are present, as these could indicate nearby setts or active foraging routes. | The scope of the Badger surveys should be extended to cover a 30-metre buffer zone outside the development boundary |
| 6.1.3 | All desk study data must be up to date at the time of submission. It should be noted that the District and County Councils have access to data from the Cambridgeshire & Peterborough Environmental Records Centre (CPERC), and officers will cross-check the published results against their own records. If any data has been excluded—such as records older than 20 years—this must be clearly explained within the methodology or limitations section of the report. | All desk study data must be up to date at the time of submission |

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| 6.1.4 | The Applicant should adhere to best practice guidance regarding the validity of ecological data. For example, resources from the Chartered Institute for Ecology and Environmental Management (CIEEM) provide recommendations on how long data remains valid after collection. If data validity falls outside of these guidelines, the data should be reviewed, and further surveys are likely to be required.<br><br>Where data gaps exist—due to reasons such as access restrictions or adverse weather conditions—these must be clearly explained. Additionally, a clear strategy should be provided detailing how such gaps will be accounted for within the data analysis if further surveys cannot be conducted. | |
| 6.1.5 | <u>Vegetation Surveys</u><br>All vegetation surveys must be conducted at an appropriate time of year to ensure accurate data collection. For example, grasslands should be surveyed in late spring or summer to provide optimal conditions for identifying plant species. Surveys undertaken at unsuitable times of the year, or following management activities such as grass cutting, are likely to be questioned by Local Planning Authority (LPA) ecologists and may require re-survey. Assumptions regarding species presence or absence, or UKHab classifications, will not be accepted if surveys are not conducted correctly.<br><br>The report (page 111) states that no protected or notable plant species were identified during the Preliminary Ecological Appraisal (PEA). However, it is important to note that the PEA is not a comprehensive vegetation survey, and such assumptions cannot be made until detailed vegetation surveys of all development areas are completed. Additionally, the PEA was conducted in February, a time | Detailed vegetation surveys of all development areas should be scoped in. |

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| | of year when many notable or protected plant species are unlikely to be detected. | |
| | <u>Invertebrates</u><br>The absence of data should not be interpreted as the absence of species, as survey effort for invertebrates outside of protected areas is often limited. Scoping out invertebrate surveys based on limited or unjustified evidence, such as a review of aerial photography, is not acceptable. Further justification is required if invertebrate surveys are to be excluded. If no robust justification can be provided, invertebrate surveys should be scoped in for further assessment. | Invertebrate surveys should be scoped in. |
| Pages 114–115 | <u>Formatting Errors</u><br>Pages 114–115 contain “Error! Bookmark not defined” formatting issues, which must be rectified as such errors are not acceptable in the submitted documentation. | |
| Page 116: | <u>Bats</u><br>SCDC seeks clarification on whether any winter bat surveys have been conducted. Winter bat activity should not be overlooked, as bats remain active during this period, particularly with increased use of artificial lighting in the winter months. Additionally, hibernation surveys may be required for structures and trees that exhibit suitable features to support hibernating bats. | As stated above, all bat activity should be scoped in. |
| 6.1.6 | <u>Construction/Operation/Decommissioning</u><br>The section contains either typographical errors or undefined acronyms, such as LEMP and CEMP, which are not included in the glossary of terms within the document. If these are not typographical errors, their meanings must be clarified. As it stands, the section is poorly written and requires review and amendment for accuracy and clarity. | |

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| | <u>Construction</u><br>References to the LEMP (Landscape and Ecological Management Plan) and BNG Plan (Biodiversity Net Gain Plan) should be reserved for the operational section and not included under construction. | |
| 6.1.7 | <u>Ground-Nesting Birds</u><br>The section acknowledges that, in the absence of mitigation, there will be an impact on ground-nesting birds. A comprehensive strategy is needed to create suitable habitat areas within the development zone where ground-nesting birds (and other species) can disperse. These zones must provide sufficient resources for all present species and ensure internal and external connectivity to support viable populations. | Impacts on ground-nesting birds should be scoped in. |
| | <u>Wintering Birds (Including Raptors) and Turtle Doves</u><br>As with ground-nesting birds, EIA assessment must address mitigation measures for wintering birds. While turtle doves have been specifically highlighted in the scoping assessment, other birds of equal conservation status have not been given due consideration. Farmland bird assemblages, including species such as skylark, yellowhammer, grey partridge, and corn bunting—mentioned in the desk study—have not been included in the analysis as a concern. Given the size of the application site and its current land use, the largest measurable impact is likely to affect farmland bird assemblages. These species, as a group, must be fully incorporated into the analysis and mitigation strategy. | Impacts on Wintering Birds (Including Raptors) and Turtle Doves |
| | <u>Bats (Foraging and Commuting)</u><br>This section also includes comments about roosting bats, which are not addressed elsewhere. Similar to the ground-nesting birds' section, it states that without mitigation, impacts to bats are likely. SCDC wish to remind the applicant that impacts to bats, or any other | All bat activity including foraging and commuting bats should be scoped in. |

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| | species listed within the Conservation of Habitats and Species Regulations 2017 (as amended) does not have to be significant to be considered illegal. SCDC would point the applicant to Supreme Court judgements such as *Morge (FC) (Appellant) v Hampshire County Council (Respondent)*[1] which upheld that the use of the term "significant" is inappropriate in matters of lawfulness. Therefore, mitigation should be designed to remove impacts, not reduce below an arbitrary level, and if there is safety critical infrastructure that requires lighting (for example) these should be located in areas that will not impact bats, rather than creating overly complicated and ineffective mitigation. | |
| | <u>Grid Connection Corridors</u><br>The eastern Grid Connection Corridor passes over two sections of Fleam Dyke SSSI, there is approximately a 500 m corridor between the two sections. That 500 m gap comprises of private properties and farms off Dungate Lane and a tree belt further to the west, much of this area is still under Scheduled Monument status. A power line already exists crossing the southeastern range of the SSSI which will likely push the Connection Corridor northwest across either the tree belt or Fleam Dyke SSSI. Any route should avoid removal of any habitat within the SSSI or impacts to the Scheduled Monument. | |
| | <u>Bats – Legal Implications</u><br>As noted earlier, Supreme Court rulings uphold that the term "significant impact" is not appropriate when assessing legal compliance with protections for bats or other species. Mitigation must seek to entirely eliminate impacts, rather than reduce them to below an arbitrary threshold. | |

[1] https://www.supremecourt.uk/cases/uksc-2010-0120

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| 6.1.8 | The Grid Connection Corridors extend approximately 13.5 km north of the developable Areas already surveyed. Assuming that the ecological constraints will be uniform across such a large distance should be avoided. This is most applicable to areas that cross within or adjacent to protected areas.<br><br>Table: Receptors/matters scoped into further assessments – scoping out of invertebrate surveys in developable areas and inter array Connection corridors has not been fully justified. Absence of desk data and aerial photography are not adequate to do this.<br>Inclusion of Farmland Birds as a receptor group in analysis, as this group is likely to experience the biggest impact from the proposed development. Key species would be turtle doves, grey partridge, yellowhammer, and corn bunting. SCDC would also recommend including skylark in this receptor group due to the number of territories likely to be impacted by the application and its Red Listed conservation status. | |
| 6.1.9 | <u>Receptors/matters/ to be scoped out of further assessment (all sites)</u><br>Reptile surveys have been scoped out of further assessment due to the abundance of arable land; however, there are pockets of suitable habitat connected by hedges and field margins that may contain common lizard and occasional grass snake. These areas will likely not be exclusively exempt form development as temporary haul roads and permanent changes to field access will be necessary and may encroach on suitable areas of habitat and connective corridors. Therefore, reptile surveys should remain under review once designs and development phases are progressed and then reassessed. | Reptile impacts should be scoped in and remain under reviewed until design and development phases are progressed and then reassessed. |
| 6.1.9 | <u>Roosting Bats</u> | As stated above, all bat activity should be scoped in. |

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| | Sufficient surveys will be required to obtain the mitigation licenses as listed in the possible mitigation, so roosting bat surveys should not be scoped out | |
| 6.1.9 | <u>Badgers</u><br>For similar reasons as roosting bats, Natural England require survey data to issue licenses, so further surveys should not be scoped out. | Badger surveys should be scoped in. |
| | <u>Cumulative Impacts</u><br>The National Policy Statement for Renewable Energy Infrastructure (EN-3) emphasises the importance of assessing cumulative ecological impacts as part of the EIA process. Applicants must identify and evaluate the combined effects of multiple projects within the same region, as outlined in Sections 2.6.2 and 2.7.2 of EN-3.<br><br>For a project of this scale, fragmented across three separate land parcels, the potential cumulative impacts on ecology are particularly significant. This is further compounded by the proximity of other large-scale solar developments in the region, such as the Sunnica project (NSIP ref: EN010106). Assessing these cumulative impacts requires a strategic and coordinated approach, supported by early consultation with statutory consultees to determine appropriate methodologies and baseline data collection, as recommended in Section 3.8.118. Given these factors, the ecological cumulative impacts of this large and fragmented photovoltaic (PV) project should be scoped into the assessment. | The ecological cumulative impacts of this large and fragmented photovoltaic (PV) project as well as other large scale PV projects in close proximity should be scoped into the assessment. |
| 6.1.14 | **Scoping Questions**<br><br>The following Scoping Questions set out at the end of the biodiversity section should be read in conjunction with the above comments. | |

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| | Please note the questions were not numbered in the report, as such have been pasted below for clarity.<br><br><u>Q1. Do you agree with the proposed consultees to be engaged with on this topic?</u><br><br>SCDC Response: The list should include local stakeholder groups including but not limited to;<br><br>• Friends of the Roman Road<br>• Cambridge Past Present and Future<br>• Parish Councils<br><br><u>Q2. Do you agree with the proposed study areas?</u><br><br>SCDC Response: SCDC have set out additional buffers for species in the response provided above.<br><br><u>Q3. Do you agree that the data sources listed to inform the EIA baseline characterisation are appropriate?</u><br><br>SCDC Response: The use of data from Cambridgeshire and Peterborough Environmental Records Centre (CPERC) is appropriate; however, SCDC are aware that they hold further large datasets for invertebrates that are slowly being added to the database, and would recommend contacting CPERC directly, and ask if there are any further sources of information.<br><br><u>Q4. Do you agree that the surveys proposed to inform the EIA baseline characterisation are appropriate?</u><br><br>SCDC Response: In the response above, SCDC have set out where it is believes there are required changes | |

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| | Q5. Are any receptors/assets/resources not identified that you would like to see included in the EIA?<br><br>SCDC Response: As set out in the above response, taking farmland birds as a receptor group would be beneficial as they are likely to be the group most impacted by the development.<br><br>Q6. Do you agree with the proposed additional (secondary and tertiary) mitigation measures and is this mitigation appropriate?<br><br>SCDC Response: Details of mitigation are vague, so there can be no agreement until survey data is published and further mitigation details are provided.<br><br>Q7. Do you agree with the receptors/matters that are proposed to be scoped in and out of the EIA?<br><br>SCDC Response: No, and SCDC have made this clear in the above response.<br><br>Q8. Do you agree with the proposed factor-specific assessment approach?<br><br>SCDC Response: One would assume that scoping would take place once a firm idea of location or route had been established. The breadth of the Grid Connection Corridors and that no assessment has been undertaken on large areas of the scheme could be detrimental to assessing the scope of assessment required to complete the ES. Resulting in additional surveys being required and possibly delaying the submission of the DCO. | |

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| **Landscape and Visual – Section 6.2** | | |
| | SCDC has reviewed Section 6.2 of the EIA Scoping Report, which outlines the proposed scope of assessment regarding the historic landscape, and officers have the following comments:<br>• The Solar PV system and its associated infrastructure have been described as reaching a maximum height of 3.5m at the tallest edge of the panel. SCDC has significant concerns about this height and the potential impacts in this particular location. Therefore, SCDC would like to understand more about the alternatives considered and the reasons for selecting this particular panel size/system. While there are several existing panel arrays within the SCDC area, most are community-scale rather than regional in scale, and the panels in those areas do not seem as tall or large. Generally, SCDC would prefer a panel system that is lower.<br>• There is a concern that the impact of the development on the numerous footpaths and bridleways within the redline area may be considerable. Paths in this rural area are highly representative of their recorded Landscape Character Area(s). It would not be suitable to enclose these paths within corridors of fencing which are proposed for adjacent fields. Paths will need enough width and openness to retain their rural aesthetic and setting. 10m offsets for biodiversity primary mitigations have been proposed which is acceptable in principle but depending on locations and setting of the Public Rights of Ways (PROWs), exceptions may be required which are wider. Equally, this offset is specifically about biodiversity; | Height and specification of the Solar PV system and its associated infrastructure should be scoped in.<br><br>The impact of the development on the numerous footpaths and bridleways should be scoped in. |

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| | receptor experience must also be taken into account in relation to the offset. PROW data was not specifically expressed within the data citations other than possibly as "Data in relation to designated landscape interests." (EIA Scoping Main Report; Ch 6.23, pg183) Data for PROW is compiled and stored at Cambridgeshire County Council for Cambridgeshire. – REF: Data Sources Q3 below.<br>• In general, SCDC would welcome an approach which reduces reliance on fencing or exclusion in general. Preferences would be to use natural deterrence including planting, hedging, ditching (where appropriate) etc. General fencing should be low key, rural in nature such as timber post and welded wire, not weldmesh or chain link. More significant fencing for the BESS structures and substations is accepted. Colour is an important aspect and green should be avoided. Weld mesh should be medium grey to black in order to help it disappear better but should also be accompanied by vegetated buffering wherever possible. Other mitigation strategies may be needed on a case-by-case basis for each incident of this type of fencing and should be reviewed collaboratively with Local Authority officers.<br>• SCDC would also welcome an approach which allows the panel areas to be used for a secondary function such as grazing. It is not clear what is being considered for the ground plane within the site. More information on the design proposals for this aspect is needed. | |

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| **6.2.13** | **Scoping Questions**<br><br>The document identified some standard questions within the body of the main report to consider – please note the questions were not numbered in the report, as such have been pasted and numbered below for clarity.<br><br><u>Q1. Do you agree with the proposed consultees to be engaged with on this topic?</u><br>SCDC Response:<br>• Para 2.6.2 references to the Planning Inspectorates Advice on Good Design, and a Design Approach Document (DAD).<br>• Para 2.6.5 identifies that "meaningful engagement will be carried out with communities and stakeholders,"<br>• Para 4.2.7 identifies GCSP (as SCDC) is as a statutory consultee. As one of the listed consultees, SCDC are satisfied that GCSP will be consulted as part of the preparation of the LVIA and EIA as well as the overall layout and design including mitigation strategies and details.<br>• SCDC will expect engagement in relation to the LVIA/EIA which may affect the study area, data and policy sources and viewpoint selection.<br><br><u>Q2. Do you agree with the proposed LVIA study areas?</u><br>SCDC Response: It is considered that the study area is acceptable at this stage and through the filter of desk top studies and preliminary survey and site walking data. SCDC reserve the right to amend either by adding or removing area within the study zone if detailed design work supports this variation. | |

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| | Q3. Do you agree that the data sources listed to inform the LVIA are appropriate?<br>SCDC Response: It is considered that one document at least is potentially missing from the list which is the District Design Guide for South Cambridgeshire (DDG). The DDG includes chapters on landscape and village character and characteristics and is the current adopted policy document. The 2021 Greater Cambridge Landscape Character Assessment (GC LCA) document is also a material consideration, and the two documents should be considered together.<br><br>It is not clear if data associated with PRoW data has been included in the listing. This data is held by Cambridgeshire County Council.<br><br><u>Q4. Do you agree that the surveys proposed to inform the LVIA are appropriate?</u><br>SCDC Response:<br><br>The surveys proposed focus on multiple site visits to capture seasonal views and photography for the key viewpoints which will be agreed as part of the engagement process. It is imperative to ensure an iterative process is achieved and SCDC accept that late requests may not achieve both winter and summer photographic baselines.<br><br><u>Q5. Are any receptors/assets/resources not identified that you would like to see included in the LVIA?</u><br>SCDC Response:<br><br>• It should be noted that the Cambridge Greenbelt is adjacent to part of the Development Areas and will be traversed by part of the Connection Corridors which doesn't appear to have been identified within the baseline conditions specifically. It has been included in the drawings associated with Appendix A but doesn't feature within the LVIA chapter (section 6.2). SCDC | |

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| | are confident it will be discussed within the LVIA but just felt it was worth calling out specifically within the listing<br>• An indication that the elevated nature of the Gog Magog Hills will likely increase the sensitivity of this receptor despite its distance from the site.<br>• As mentioned earlier the adopted District Design Guide SPD provides Landscape Character information at a less detailed level than the new 2021 Greater Cambridge LCA but both should be considered together.<br><br><u>Q6. Do you agree with the proposed additional (secondary and tertiary) mitigation measures and is this mitigation appropriate?</u><br>SCDC Response:<br>• Reference to BS5837:2012 or successor document should be included as well as the sentence as written "Tree, woodland and hedgerow protection would be in accordance with BS5837:2012 (or successor document) and all other best practice and British Standards for construction in proximity to trees and their root protection areas (RPAs).<br>• At this stage the principle of the mitigation approach is acceptable but will achieve more clarity following consultation and detail design where the features, species, distribution and extents of landscape mitigations will be expanded upon.<br><br><u>Q7. Do you agree with the landscape and visual receptors that are proposed to be scoped in and out of further assessment?</u><br>SCDC Response:<br>• IN - The list of receptors is not exhaustive. For example, Table 6.2.8 identifies Key routes – Visual receptors as the more major routes between villages, B-roads and A-roads in the vicinity but does not identify any other key, though minor, | The list of receptors scoped in is not exhaustive and should include lesser routes and roads in the vicinity including High Streets and rural roads. |

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| | routes such as The Common between West Wratting and Withersfield. Could an additional row be included which captures lesser routes and roads in the vicinity including High Streets and rural roads.<br>• IN – SCDC would consider that naming Worsted Roman Road, Fleam Dyke and Devil's Dyke as secondary titles of parts of the Icknield and Harcmalow Ways would be a positive addition as they have an additional level of sensitivity associated with their heritage aspect as well as extending beyond either of the named Ways as they traverse the landscape. Again, beyond their contribution as PRoWs.<br>• OUT – SCDC do not agree with scoping out of NCA 87 and 46. While the impact would be insignificant in relation to the scale of the NCA, the documentation provides SEOs which expand on and support the recommendations within the local LCAs.<br>• OUT – NCA 86, GC LCA-1E, GC LCA-7B, GC LCA-7C, GC LCA-8A, GC LCA 9D – agreed.<br>• Other LCAs outside of the SCDC boundaries are not considered applicable to SCDC review and consultation.<br>• OUT – Listed settlements in Table 6.2.9 - agreed<br>• OUT – A11, A14 and A1303 – agreed<br>• OUT – The scoping out of Gog Magog Hills and Wandlebury Country Park are NOT agreed. Photography showing a lack of visual intrusion on these sites will need to be tested and excluded through the viewpoint selection process.<br>• OUT – All Other 'Recreational and/or Tourist Sites' listed below the Gog Magog Hills/Wandlebury entry are agreed.<br>• OUT – All 'Other' entries at the end of Table 6.2.9 are agreed. | Worsted Roman Road, Fleam Dyke and Devil's Dyke should be scoped in as secondary titles of parts of the Icknield and Harcmalow Ways.<br><br>NCA 87 and 46 should be scoped in.<br><br>Gog Magog Hills and Wandlebury Country Park should be scoped in. |

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| | Q8. Do you agree with the proposed factor-specific assessment approach?<br>SCDC Response: Assessment approach is acceptable.<br><br>Q9. Are there any specific viewpoints that you would like us to consider and/or illustrate as a photomontage?<br>SCDC Response: Local views will be an important factor as will views from elevated points around the development site, including potentially the Gog Magog's and the Wilbraham's. Collaborative decision making on viewpoints, and testing of views through ground truthing will be required to ensure that all sensitivities are addressed.<br><br>Q10. Are there any other developments which you consider it will be necessary for us to address in a cumulative landscape and visual impact assessment?<br>SCDC Response: It is considered that all other existing and approved energy production developments in the area should be included in the cumulative assessment. This includes community-scale solar farms, wind farms, as well as much larger regional-scale solar farms, including but not limited to Sunnica East and Sunnica West, East Park Energy, and the enlargement of the Burwell substations and grid connection point. The developments selected for cumulative assessment, as well as any excluded from the assessment, must be agreed collaboratively with Local Authority officers and tested for inclusion or exclusion. | |

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| **Historic Environment / Cultural heritage – Section 6.3** | | |
| 6.3.14 | **Scoping Questions**<br><br><u>Q1. Do you agree with the proposed consultees to be engaged with on this topic?</u><br><br>SCDC Response: Yes<br><br><u>Q2. Do you agree with the proposed study area?</u><br><br>SCDC Response:<br><br>• (6.3.2) 2km is considered to be sufficient only as a baseline study area, while allowing for the inclusion of more distant assets as identified through assessment and use of the ZTVs (per 6.2.2). However, the 2km/3km limit should be removed for assets so identified, or more information given to justify these limits.<br>• Heritage assets should not be scoped in or out only on the basis of proximity or arbitrary search radius. The extent of setting and effects can vary according to topography and the characteristics of an asset and its surroundings. There are heritage assets in this area which have landmark value and/or which offer raised vantage points and potential for broad views across the historic landscape (e.g., Gog Magog Hills sites). | The scoping should extend beyond the 2km/3km limit for assets identified. |
| | <u>Q3. Do you agree that the data sources listed to inform the EIA baseline characterisation are appropriate?</u><br><br>SCDC Response: | Data sources listed to inform the EIA baseline should include Conservation Area Appraisals, District Design Guide, Greater Cambridge Landscape Character Assessment, Neighbourhood Plans, Conservation Area |

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| | • Para 6.3.3 - The South Cambridgeshire Local Plan 2018 Policy NH/14 is titled 'Heritage Assets'. Other sources of information should include Conservation Area Appraisals, District Design Guide, and Greater Cambridge Landscape Character Assessment.<br>• Para 6.3.1 - In addition to the CHER, non-designated heritage assets (NHDA) are identified in adopted Neighbourhood Plans, Conservation Area Appraisals, and the Cambridgeshire Local Heritage Listing Project. NDHAs may also be identified through the development process (SCDC Local Plan Policy NH/14). | Appraisals, and the Cambridgeshire Local Heritage Listing Project. |
| | <u>Q4. Do you agree that the surveys proposed to inform the EIA baseline characterisation are appropriate?</u><br><br>SCDC Response: Para 6.3.4 Yes, provided heritage assessment and LVIA are completed in parallel and inform each other, in line with Historic England Advice Note HEAN15. It should be noted that while LVIAs are usually based on publicly accessible viewpoints, the contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting. It is expected that key viewpoints will be agreed with SCDC Conservation Officers and inform heritage impact assessment. | |
| | <u>Q5. Are any receptors/assets/resources not identified that you would like to see included in the EIA?</u><br>SCDC Response:<br>• See response to question 2 (Q2). There are elevated locations outside the 2/3km limit but within the ZTV for 3.5m and 18m | |

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| | (Appendix H) where designated assets should be tested for inclusion as part of the baseline surveys.<br>• See response to Q3. NDHAs are only identified through CHER at this stage and more may be identified.<br>• See response to Q4. Note that important viewpoints may lie outside the 2km radius and LVIA viewpoint selection should include heritage asset criteria. This is particularly important for views towards 'Parcel C', where appreciation of the historic environment is enhanced by the landscape setting and grouping of designated and non-designated heritage assets associated with Balsham, West Wratting, Weston Colville, Weston Green, Carlton Green, West Wickham, Horseheath, etc. | |
| | <u>Q6. Do you agree with the proposed additional (secondary and tertiary) mitigation measures and is this mitigation appropriate?</u><br><br>SCDC welcome mitigation hierarchy (4.8.1), high level approach to setting (6.3.7), and recognition of potential opportunities for enhancement (6.3.11). However all very high level and brief at this stage so it not possible to comment on specific measures or if mitigation is appropriate. SCDC note that Table 2-2 (p38) sets a minimum offset/buffer from solar infrastructure to listed buildings given at 10m. This is not a sufficient minimum, as it is unlikely in most cases that this distance would allow for sufficient mitigation of impact on the setting of a listed building. | The offset/buffer from solar infrastructure to listed buildings should be scoped in beyond 10m. |
| | <u>Q7. Do you agree with the receptors/matters that are proposed to be scoped in and out of further assessment?</u> | |

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| | SCDC Response: See comment under question 2 regarding 2/3km limit.<br><br>Para 2.9.11 ( Scoping out) - Listed buildings in close proximity to the potential access point locations should be scoped in to Construction phase assessment. Access point location and construction traffic management must minimise potential harm to designated heritage assets | Listed buildings in close proximity to the potential access point locations should be scoped in to Construction phase assessment. |
| | <u>Q8. Do you agree with the proposed factor-specific assessment approach?</u><br>SCDC Response: A full assessment of significance and potential impacts on setting should also take into account:<br>• Views, including designed views such as those from the Registered Parks & Gardens, as well as fortuitous views which contribute to appreciation and significance of an asset or group of assets within the landscape.<br>• Landscape and settlement character informing the setting of heritage assets.<br>• Group value of assets and connections within the landscape, including historic routes e.g., to churches or between village conservation areas, which contribute to their significance.<br><br>Full assessment must be undertaken in accordance with Historic England guidance including GPA3, HEAN 12, and HEAN 15 Commercial Renewable Energy Development and the Historic Environment, and include cumulative historic environment impacts, alternative location options, and mitigation measures, informed by technical analyses and narrative description | |

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| 3.2.5 | <u>Chapter 3 (Alternatives):</u><br><br>Para 3.2.5, Table 3-1 does not include statutorily designated heritage assets as an environmental consideration in the site selection process. Given the sensitivity of the location concerning potential heritage impacts, the consideration of alternatives should provide more detailed information on historic environment receptors. | Statutorily designated heritage assets should be scoped in. |
| Other | SCDC defer to Cambridgeshire County Council on archaeological matters. | Defer to Cambridgeshire County Council on archaeological matters. |
| **Land, soils and groundwater (Contamination ) – Section 6.4** | | |
| | Land, soils, and groundwater have been scoped into the Environmental Impact Assessment (EIA), with a Preliminary Risk Assessment to be prepared in support of the Development Consent Order (DCO) application.<br><br>SCDC is satisfied with the applicant's statement that, while effects from potential land and groundwater contamination during construction and decommissioning are unlikely to be significant, these have been scoped in for further assessment.<br><br>Effects during the operational phase have been scoped out. While SCDC generally agrees with the justification provided, noting that any contamination issues arising during operation would be addressed under other regulatory controls, the potential risk of contamination from the Battery Energy Storage System (BESS) warrants that effects during the operational phase should also be scoped in for assessment. | The potential risk of contamination from the Battery Energy Storage System (BESS) warrants that effects during the operational phase should also be scoped in. |

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| **Air Quality - Section 6.5** | | |
| | Air quality during construction and decommissioning has been scoped into the Environmental Impact Assessment (EIA), with an assessment to be prepared in support of the Development Consent Order (DCO) application. Air quality has been scoped out of further assessment during the operational phase.<br><br>SCDC generally concurs with the applicant's methodology and statements. The guidance documents referenced in the proposed assessment methodology are also considered appropriate. | |
| **Noise and Vibration - Section 6.6** | | |
| | The applicant has included the following in the scope of their assessment: noise and vibration for construction and decommissioning, road traffic noise for construction and decommissioning, and operational noise from various equipment necessary for the site's operation.<br><br>The applicant has excluded operational vibration, operational road traffic noise, and potential impacts on SSSIs and SACs during construction, operation, and demolition. | |
| | SCDC generally concurs with the methodology and scope outlined by the applicant. However, in relation to operational noise, SCDC recommends that, in addition to BS:4142, the applicant considers predicting third-octave bands in accordance with guidance such as NANR45. This would help ensure that low-frequency noise does not adversely affect any sensitive receptors. | Third-octave bands in accordance with guidance such as NANR45 should be scoped in. |

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| | Given the absence of human receptors in SSSIs and SACs, SCDC cannot confirm the acceptability of the applicant's exclusion of these areas. | |
| | SCDC notes that the applicant intends to seek agreement on the methodology prior to conducting monitoring. The council looks forward to engaging in these discussions. | |
| **Traffic, Transport and Highways – Section 6.7** | | |
| | SCDC defer to Cambridgeshire County Council as the Highway Authority on this matter. | Defer to Cambridgeshire County Council as the Highway Authority. |
| **Population – Section 6.8** | | |
| | <u>Public Rights of Way (PRoWs) and Tourism Receptors</u><br>Section 6.8 of the EIA Scoping Report outlines the proposed scope of assessment, specifically regarding Public Rights of Way (PRoWs) and tourism receptors. SCDC defers to Cambridgeshire County Council, as the Highway Authority, for matters relating to PRoWs. | |
| 6.8.3 | <u>EIA Baseline Characterisation</u><br>The EIA baseline characterisation currently omits relevant data sources, such as local population ward-based data available from the Cambridgeshire Joint Strategic Needs Assessment (JSNA), which can be accessed through Cambridgeshire Insight and Public Health Fingertips data. Additionally, the Local Health Strategy should be considered to provide a more comprehensive baseline assessment. | The EIA baseline characterisation should scope in data sources local population ward-based data available from the Cambridgeshire Joint Strategic Needs Assessment (JSNA) and the Local Health Strategy. |

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| 6.8.3 | <u>Statement of Community Engagement</u><br>In preparing the Statement of Community Engagement, SCDC recommends that the applicant engage with the Parish Council and other local stakeholders, such as schools and community groups that utilise the PRoWs and may be directly impacted by the proposal. | |
| 6.8.4 | <u>Health Profile Assessment</u><br>Paragraph 6.8.4 states that no surveys have been undertaken nor are proposed specifically for the population factor. Instead, baseline information from other environmental factors (e.g., BMV agricultural land) will be used where necessary. SCDC requests clarification on how the impacts on local residents will be measured if there is no intention to understand the local health profile of residents affected by the proposal, as referenced in paragraph 5.8 regarding baseline health profiles. | The baseline of the local health profile of residents should be scoped in. |
| 6.8.5 | <u>Private Property and Housing</u><br>The report notes that there are no commercial or residential buildings at risk of demolition for the scheme. However, Section 6.8.7 briefly addresses the impact on private properties and housing, recognising the potential for visibility of the scheme from neighbouring settlements. The scheme will directly affect approximately 3500 residents within the Ward of Balsham. While the report mentions that minimising visibility will be a key consideration in finalising the design, there is no reference to community engagement or a Statement of Community Consultation within either the Human Health or Population chapters of the EIA Scoping Report. | |
| 6.8.5 | <u>Health Effects on Individuals</u><br>Health effects extend beyond physical impacts, such as air quality, noise, and vibration. The proposed assessment methodology should include significant effects on land use and accessibility for all residents directly impacted by the proposal, particularly in relation to mental health impacts associated with the loss of agency. This includes long-term changes to the living environment, particularly the | The proposed assessment methodology should be scoped in to include significant effects on land use and accessibility for all residents directly impacted by the proposal, particularly in relation to mental health impacts associated with the loss of agency. |

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| | loss of rural and natural views, and ongoing disturbance and nuisance during the construction phase. | |
| 6.8.5 | Mental Health Assessment<br>To properly assess the significant effects on mental health, the mental health of the population should be assessed at baseline and reassessed periodically to capture changes in health due to the planning process, construction phases, and operational phase. | |
| 6.8.5 | Recommendation for Mental Health Impact Assessment<br>SCDC recommends that mental health impacts be scoped into the Human Health chapter of the EIA, and that a separate Mental Health Impact Assessment be conducted to ensure adequate mitigation measures are considered for the local population. | |
| 6.8.5 | Missing Receptors<br>Receptors missing from the assessment methodology include residents as a distinct geographical population group, due to their common proximity to the proposed development. The views of these residents should be considered and captured within the EIA, with their collective assessment forming part of the overall analysis. Failing to include this data would prevent the applicant from fully understanding the significance of the impacts on the local population. | |
| **Climate – Section 6.9** | | |
| | The applicant has provided an outline assessment of the potential implications of the project on greenhouse gas (GHG) emissions, and SCDC is generally supportive of the overview presented.<br><br>The Environmental Impact Assessment (EIA) Scoping document includes an assessment of the likely significant effects of the proposed scheme on climate, with a focus on GHG emissions, while scoping out | Updates to baseline methodology to be scoped in when they become available. |

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| | the vulnerability of the project to climate change. SCDC supports this approach, as the document confirms that vulnerability to climate change will be addressed comprehensively in the Flood Risk Assessments to be provided with the Development Consent Order (DCO) application.<br><br>Section 6.9 outlines the various methodologies and standards to be employed to ensure the accuracy of GHG emissions reporting. SCDC is supportive of the proposed data sources and assumptions used in assessing climate impacts and quantifying GHG emissions.<br><br>SCDC notes that operational emissions from a Combined Cycle Gas Turbine (CCGT) have been used to assess the GHG savings of the scheme. This technology is currently considered the most carbon-efficient fossil-fuelled option available. The applicant acknowledges that the Secretary of State has previously deemed a CCGT baseline inappropriate for such comparisons. However, in the absence of a more suitable methodology, the applicant asserts that a comparison with CCGT emissions remains a robust and appropriate approach for understanding the scheme's GHG savings. SCDC would encourage the baseline to be updated if a more suitable methodology becomes available as the project progresses.<br><br>Overall, SCDC is generally supportive of the data sources and methodologies identified for inclusion in the EIA. SCDC is also satisfied with the proposed secondary and tertiary mitigation measures, which will be detailed in other documentation, such as the Construction Environmental Management Plan (CEMP) and the Decommissioning Environmental Management Plan (DEMP). | |

Stow-cum-Quy
Parish Council

**Chairman: Sarah d'Ambrumenil ,**
**Clerk: Mrs S Chambers-Turner**
41 Stow Road
Stow-Cum-Quy, CB25 9AD,
Tel: [redacted]
Email: clerk@stowcumquy.co.uk

SCQ/KSF/140125

Dear Sirs

Firstly let me thank you for the opportunity to comment on the Environmental Impact Scoping Report for the above development wish to receive a Development Consent Order.

The Parish Council wishes to raise awareness of this incredibly tight deadline to be able to respond to this application due to the Christmas break. Notification was received on 17th December 2024 and the closure date is 14th January 2025 with no opportunity to extend the deadline. We note that the Planning Inspectorate did make mention of this to the applicant advising against submission at that time, but this was not considered by the applicant. It is also noted that this has happened directly on the back of the public engagement events that have been held by the organisation.

As a Parish Council that will not be affected in a major way by the development of the Kingsway solar farm, we wish to lend our support to the villages that are going to be largely encompassed by this development. As a locality is agreed that solar energy is important, however it is felt that the area is going to have all its landscape covered with solar panels, as there is already a large solar farm located at Burwell, another planned between Fen Ditton and Stow Cum Quy and now this development near Great Wilbraham, Six Mile Bottom and the West Wratting area, which already has solar panels covering a large area of its landscape. We therefore wish for the locality to be considered as a whole rather than specific parishes and we wish for the applicant to research any current proposals or previously granted applications when considering the locations of the sites for the panels. Consideration must be given to all of the localities areas of scheduled monuments, SSSI sites and listed buildings should be included within the scoping report for any area that either there is a panel site is located or on any land that the pylon corridor is to cross. Furthermore, it is also felt that the proposed pylon corridor is going to

cause significant problems for the landscape as there is already a current line of pylons that run in a similar direction. If consideration is not given to visual appearance of the secondary line in conjunction with the current line this will further impact the visual landscape. The Parish Council are also wishing that consideration is given to the loss of visual landscape and of the implications of such dense areas of solar panels for residents including the financial loss. They also wish for consideration to be given to the physical impact of the panels such as glare to motorists, safety of the sites and the disruption due to the installation.

We would appreciate as a Parish Council who's immediate locality will be affected to be contacted on future consultations.

Yours faithfully

[redacted]

Sam Chambers-Turner

Clerk to the Council

## Patten, Jack

**From:** Jenkins, Leigh [redacted]
**Sent:** 10 January 2025 15:35
**To:** Kingsway Solar Farm
**Subject:** Suffolk Constabulary: Kingsway Solar Development

**Follow Up Flag:** Follow up
**Flag Status:** Flagged

> You don't often get email from [redacted]

Dear Developer

Where appropriate Suffolk Constabulary looks to engage with those developments within our policing area that may have an impact on the level of policing service that is currently afforded to the communities we serve. Such engagement with developers also allows Suffolk Constabulary to understand the likely demand that may be placed on the police from the developer i.e. the movement of Abnormal and Indivisible Loads (AILs).

Through our experience of working with major developments, it is appreciated that the movement of AILs that require a police escort is an area that can require significant planning and resourcing by Suffolk Constabulary. Whilst for the developer, the need for police escorted AILs to be moved in a timely manner is critical when looking to achieve the build programme for a development.

It needs to be appreciated by the developer that Suffolk Constabulary does not have a dedicated Team for the movements of AILs. AILs are moved through overtime, and so the capacity to move loads is finite. In recent years, this capacity to move AILs has diminished as the growth of developments in Suffolk has seen a significant increase. In view of the proposed growth of Nationally Significant Infrastructure Projects (NSIP) earmarked for Suffolk, the demand for the need for police escorted AILs is only going to increase.

Whilst Suffolk Constabulary will always look to assist with the movements of AILs, if a specific development is likely to have a significant demand for AIL movements for a sustained period, Suffolk Constabulary always encourages large scale developments to engage with us and where appropriate seek a solution and appropriate mitigation to allow Suffolk Constabulary to deliver any agreed solution. Otherwise the movement of loads will be dealt with as business as usual activity, and moved through overtime capacity and will need to be considered as part of the overall demand for police escorted AIL movements across Suffolk and so subject to normal lead times before they can be moved.

To allow Suffolk Constabulary to make an informed opinion as to the likely impact of your development, we would request the following information:

- Number of AILs (over what period, and forecasted demand breakdown i.e. likely Yearly, monthly demand)
- Dimensions of AILs
- Point of origin,
- Proposed routes

Once the above has been received, Suffolk Constabulary can consider the information provided and so the most appropriate solution and the mitigation required to deliver the solution. A meeting can then be convened with yourselves and a proposed solution can be discussed.

It cannot be stressed enough that the need for early engagement by you, and provision of the information requested is imperative. Suffolk Constabulary works to capacity, so any solution agreed upon that requires an uplift in capacity will require a suitable lead in period for Suffolk Constabulary to ensure that appropriate resources are indeed available to deliver the solution.

Regards,


Leigh Jenkins

**Business Liaison Manager**

FUTURES HUB
INNOVATE & IMPROVE

**Suffolk Constabulary**

Police Headquarters

Portal Avenue, Martlesham, IP5 3QS

Tel: [redacted]

Website: www.suffolk.police.uk

Social media:

This e-mail carries a disclaimer

Go here to view Suffolk Constabulary Disclaimer

**SWAFFHAM BULBECK PARISH COUNCIL**
**Chairman: Mr Gordon Reid. Clerk: Mrs Sam Chambers-Turner**
**41 Stow Road**
**Stow-Cum-Quy**
**CB25 9AD**
**Tel:** [redacted]
**Email: clerk@swaffhambulbeckpc.org.uk**

Ref: SBPC/KSF/140125

14th January 2025

Dear Sirs

**REF : EN010165**

Firstly, let me thank you for the opportunity to comment on the Environmental Impact Scoping Report for the above development wish to receive a Development Consent Order.

The Parish Council wishes to raise awareness of this incredibly tight deadline to be able to respond to this application due to the Christmas break. Notification was received on 17th December 2024 and the closure date is 14th January 2025 with no opportunity to extend the deadline. We note that the Planning Inspectorate did make mention of this to the applicant advising against submission at that time, but this was not considered by the applicant. It is also noted that this has happened directly on the back of the public engagement events that have been held by the organisation.

As a Parish Council that may be affected by the pylon corridor, we wish to raise concerns over the proposals. We also wish to lend our support to the villages that are going to be largely encompassed by this development. As a locality is agreed that solar energy is important, however it is felt that the area is going to have all its landscape covered with solar panels, as there is already a large solar farm located at Burwell , another planned between Fen Ditton and Stow Cum Quy and now this development near Great Wilbraham, Six Mile Bottom and the West Wratting area, which already has solar panels covering a large area of its landscape. We therefore wish for the locality to be considered as a whole rather than specific parishes and we wish for the applicant to research any current proposals or previously granted applications when considering the locations of the sites for the panels. Consideration must be given to all of the localities areas of scheduled monuments, SSSI sites and listed buildings should be included within the scoping report for any area that either there is a panel site is located or on any land that the pylon corridor is to cross. Furthermore, it is also felt that the proposed pylon corridor is going to cause significant problems for the landscape as there is already a current line of pylons that run in a similar direction. If consideration is not given to visual appearance of the secondary line in conjunction with the current line this will further impact the visual landscape. The Parish Council are also wishing that consideration is given to the loss of visual landscape and of the implications of such dense areas of solar panels for residents including the financial loss. They also wish for consideration to be given to the physical impact of the panels such as glare to motorists, safety of the sites and the disruption due to the installation.

Yours faithfully

**Sam Chambers-Turner**
**Clerk to the Parish Council**

UK Health Security Agency

Environmental Hazards and Emergencies Department
Seaton House, City Link
London Road
Nottingham, NG2 4LA

nsipconsultations@ukhsa.gov.uk
www.gov.uk/ukhsa

Your Ref: EN010165
Our Ref: CIRIS91570

Ms Deb Glassop
The Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

14th January 2025

Dear Ms Glassop,

**Nationally Significant Infrastructure Project**
**Kingsway Solar Farm EN010165**
**Scoping Consultation Stage**

Thank you for including the UK Health Security Agency (UKHSA) in the scoping consultation phase of the above application. Please note that we request views from the Office for Health Improvement and Disparities (OHID) and the response provided below is sent on behalf of both UKHSA and OHID. The response is impartial and independent.

The health of an individual or a population is the result of a complex interaction of a wide range of different determinants of health, from an individual's genetic make-up, to lifestyles and behaviours, and the communities, local economy, built and natural environments to global ecosystem trends. All developments will have some effect on the determinants of health, which in turn will influence the health and wellbeing of the general population, vulnerable groups and individual people. Although assessing impacts on health beyond direct effects from for example emissions to air or road traffic incidents is complex, there is a need to ensure a proportionate assessment focused on an application's significant effects.

Having considered the submitted scoping report we wish to make the following specific comments and recommendations:

Environmental Public Health

We understand that the promoter will wish to avoid unnecessary duplication and that many issues including air quality, emissions to water, waste, contaminated land etc. will be covered elsewhere in the Environmental Statement (ES), such that a separate Human Health section is scoped out. We believe the summation of relevant issues into a specific section of the report provides a focus which ensures that public health is given adequate consideration.

In terms of the level of detail to be included in an ES, we recognise that the differing nature of projects is such that their impacts will vary. UKHSA and OHID's predecessor organisation Public Health England produced an advice document Advice on the content of Environmental Statements accompanying an application under the NSIP Regime', setting out aspects to be addressed within the Environmental Statement[1]. This advice document and its recommendations are still valid and should be considered when preparing an ES. Please note that where impacts relating to health and/or further assessments are scoped out, promoters should fully explain and justify this within the submitted documentation.

Our position is that pollutants associated with road traffic or combustion, particularly particulate matter and oxides of nitrogen are non-threshold; i.e, an exposed population is likely to be subject to potential harm at any level and that reducing public exposure to non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards will have potential public health benefits. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure) and maximise co-benefits (such as physical exercise). We encourage their consideration during development design, environmental and health impact assessment, and development consent.

Major Accidents & Disasters

We understand that the promoter proposes not to include a dedicated chapter for accidents and disasters. The proposed development will include a Battery Energy Storage System (BESS) and various electrical infrastructure. While the likelihood of an incident involving the BESS can be greatly reduced in the design stage of the project, the impact of such incidents can be severe. The location of the BESS is not currently given in the documentation and consequently the applicant should assess, within the ES, the risk to nearby public health and environmental receptors from:

Failure of the BESS causing fire and release of smoke and associated toxic gases.

Release to the environment of potentially contaminated water used by the fire service in response to a BESS fire.

Fires (including wildfires) involving solar panels and associated electrical infrastructure.

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1 https://khub.net/documents/135939561/390856715/Advice+on+the+content+of+environmental+statements+accompanying+an+application+under+the+Nationally+Significant+Infrastructure+Planning+Regime.pdf/a86b5521-46cc-98e4-4cad-f81a6c58f2e2?t=1615998516658

Further detail should include the likely emissions to air from such incidents and proximity of the BESS to sensitive human health receptors.

Yours sincerely,

On behalf of UK Health Security Agency

Please mark any correspondence for the attention of National Infrastructure Planning Administration.

West Suffolk Council

The Planning Inspectorate
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

Your ref: EN010165
Our ref: ENQ/24/1592
Contact: Ed Fosker
[redacted]

Date: 13 January 2024

Dear Mrs Glassop,

**Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11.**

**Application by Kingsway Solar Farm Limited (the Applicant) for an Order granting Development Consent for Kingsway Solar Farm (the Proposed Development).**

West Suffolk Council as a relevant 'consultation body' defined in the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended) makes the comments laid out below regarding the information that should be provided in the Environmental Statement (ES).

These comments outline the matters that the District Council considers should be included within the Environmental Statement (ES). The Council has considered the specific characteristics of the development, the specific characteristics of development of the type concerned and the environmental features likely to be affected by the development.

Where mitigation of adverse effects is identified, such measures should be described in full within the ES and, where appropriate, linked to identified international, national, and local policy and guidance with reference to appropriate consultees and expert evidence/advice/opinion. The ES should report on how any consultation responses have been addressed and if advice is disregarded, include an explanation to justify or support that decision.

The proposed scope of the ES is noted and given the relationship of the scheme to West Suffolk Council with only the grid connection corridor entering the district boundary the potential issues which have been identified are impacts on ecology and the cumulative impact on the existing highway network during the construction phase and potential for cumulative impacts with any other national infrastructure projects such as Sunnica solar farm which is partially located within West Suffolk.

**Cumulative impacts on the existing highway network**

The ES will need to describe the site and surroundings and provide an account of the baseline conditions. The ES will need to provide an assessment based upon minimum and maximum (or fixed) size and height parameters. A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

The ES should include an impact assessment to identify, describe and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment, (subject to available information):

a. Existing completed projects.
b. Approved but incomplete projects.
c. On-going activities.
d. Plans or projects for which an application has been made and which are under consideration by the consenting authorities.
e. Plans and projects which are reasonably foreseeable, i.e. known projects for which an application has not yet been submitted but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

With regard to approved but incomplete projects in July 2024 the Secretary of State for Energy Security and Net Zero granted development consent for Sunnica Energy Farm.
https://national-infrastructureconsenting.planninginspectorate.gov.uk/projects/EN010106/documents

With regard to highways impact when considering Sunnica the Inspector concluded that the Proposed Development would have adverse transport, traffic and highway safety impacts, particularly during transport of Abnormal Indivisible Loads and in respect of Heavy Goods Vehicles on local roads, but that these adverse impacts are capable of being satisfactorily managed and minimised through the Construction Traffic Management Plan and the recommended Order. However, the Inspector concluded that these impacts will nevertheless cause harm, albeit temporary, and therefore carry moderately negative weight in the planning balance. The Secretary of State agreed with the Inspectors conclusions on this matter and ascribed the matter moderate negative weight in the planning balance.

It is noted that the potential traffic and movement receptors to be scoped are detailed at 6.7.8 of the scoping report, and that traffic estimates for any stage of the scheme are not confirmed at this time and may be subject to change but will be confirmed prior to assessment.

Sunnica is clearly a large-scale national infrastructure project with the potential to cause temporary harm to the existing highway network and the cumulative impact of which must be identified in combination with the current proposal by Kingsway Solar Farm Limited within the Environmental Statement.

Engagement on the following is required:

• A traffic and movement study area (potentially separately for heavy and light

vehicles) for construction traffic (to include in cumulative impacts in combination with other large-scale national infrastructure projects e.g. Sunnica);
• Issues to be considered and addressed in the Environmental Statement; and
• Assessment methodologies, particularly in relation to sensitive receptors.

The key consultees will be the local highway authorities and planning authorities which may be impacted during the construction phase of the Scheme, as well as National Highways.

Anticipated consultees are:

- South Cambridgeshire District Council.
- East Cambridgeshire District Council.
- Cambridgeshire County Council.
- West Suffolk District Council
- National Highways (due to the proximity of the A11 and A14 trunk roads).

Where alternative approaches have been considered, the ES should include a description of the reasonable alternatives studied which are relevant to the proposed development and its specific characteristics and provide an indication of the main reasons for the choice made, including a comparison of the effects.

**Ecology**

The proposed development, which comprises construction of a generating station with capacity of more than 50 MW (Development areas A, B and C and inter array connection corridors) and a new electric line exceeding 2 km (grid connection corridors A and alternative B), is outside of West Suffolk. However, the study area for the project (as described in the scoping report does include the western extents of West Suffolk district.

There are a number of statutory designated sites within the study area that are within or bordering West Suffolk which include:

- Devils Dyke SAC
- Devils Dyke SSSI and
- Newmarket Heath SSSI
- Carlton Wood SSSI

West Suffolk Council note the content of the scoping report and has nothing to add at this stage.

**Landscape and Visual Effects**

The emerging West Suffolk local Plan **West Suffolk Local Plan Submission Draft 2024**
https://westsuffolk.inconsult.uk/gf2.ti/-/1596610/197689797.1/PDF/-/1.%20West%20Suffolk%20Local%20Plan%20Submission%202024.pdf
which is at an advanced stage in the examination process (soon to commence mods consultation) **West Suffolk Local Plan (Regulation 24) 2024 - Examination in public - West Suffolk Planning Policy Consultations**
https://westsuffolk.inconsult.uk/WSLPexamination/consultationHome

has identified locally valued landscapes (policy SP5) and mapped in the Policies Map Book **West Suffolk Local Plan Policies Map Book 2024** https://westsuffolk.inconsult.uk/gf2.ti/-/1596610/197690373.1/PDF/-/7.%20West%20Suffolk%20Local%20Plan%20Policies%20Map%20Book%202024.pdf
The evidence to support these areas is at Landscape Valuation report and annexes April 2022

Where they are present, for example in the vicinity of Great Bradley, the LVL's should be taken into consideration when assessing the impact of the proposals on receptors where West Suffolk is within the 3km study area.

West Suffolk Council note the content of the scoping report and has nothing to add at this stage.

The comments contained within this letter are made without prejudice to the consideration and determination of any subsequent planning application/s or consultations that may be submitted to the Council or the procedure provided by regulation 25 of the Regulations to request further environmental information should the need arise.

If you have any queries regarding the contents of this opinion, please contact the case officer Ed Fosker by means of the contact options set out above.

Yours sincerely,

Penelope Mills

Service Manager (Planning Development)

# West Wickham Parish Council response to Kingsway Solar EIA Scoping Report

## Background about West Wickham

### Character and nature of our community

The Parish of West Wickham has a population of approximately 440 people. It has a distinctive rural character[1]. The residents enjoy pervasive access to the countryside through an extensive public right of way network and have a continuous connection to the natural and agricultural landscape that surrounds the settlement areas.

West Wickham has few amenities and community life is centred around St Mary's Church (///walked.pursue.canoe) and the Village Hall (///space.intervals.nooks). The Village Hall hosts a range of village clubs, societies and regular social events.

Residents of West Wickham feel strongly about protecting their Parish and community from inappropriate development and enthusiastically supported their Neighbourhood Development Plan which was adopted in September 2022. The vision of the plan included *"protecting the rural character of the Parish of West Wickham, the balance of built, agricultural and natural landscapes, its diverse wildlife and its tranquillity."*

### The landscape of West Wickham and the development area

The main village settlement is in the centre of the parish and is situated along a ridge running north-east/south-west with gently sloping valleys on either side. This elevated location means West Wickham is particularly sensitive to damage to the quality and character of the landscape. The entirety of the northern boundary of the West Wickham and Burton End settlement areas are in the zone of theoretical visibility due to the proximity of Area C of the application.

## Responses to the EIA Scoping Report

### Biodiversity, habitats and wildlife

The scoping report repeatedly states for various scoped out species that *"Developable Area C and Inter Array Connection Corridors have not been surveyed but habitats appear to be similar to those present within Developable Areas A and B".* We object to this generalisation and the applicant should complete the necessary due diligence for Area C before requesting to scope out various species and habitats.

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[1] West Wickham Character Assessment, 2018
https://www.scambs.gov.uk/media/19315/west-wickham-character-assessment.pdf

### Devana Centre for Wildlife Recovery

The Devana Centre for Environmental Recovery[2] covers approximately 100 acres between West Wickham and the southern sections of Area C. The site boundary is less than 300m from Area C and entirely contained by the 1km distance radii. This is a rapidly improving habitat area which will include woodland, scrub, grassland, ponds and other high value habitats. We request that the impact of the proposed development on this important site should be scoped into the EIA.

## Landscape and Visual Amenity

The southern part of Area C of the proposed development and West Wickham are contained in the "4E West Wickham Wooded Claylands" landscape area identified by the Greater Cambridge Landscape Assessment[3]. It has specific sensitivities of "distinctive open, panoramic views towards wooded horizons" and we welcome its recognition in the Baseline conditions in 6.2.5 and its inclusion in scoping in 6.2.8.

### Public Rights of Way

We support section 6.2.8 scoping in ProW users within 3km of the development area, This includes the majority of the ProW network in West Wickham Parish.

### Dark Skies and Light Pollution

We strongly object to the de-scoping of lighting impacts on landscape character and visual amenity in section 6.2.6. The landscape around West Wickham is some of darkest in South Cambridgeshire. It is very sensitive to light pollution[4]. Neighbourhood Plan Policy WWK/6 explicitly seeks to protect the night sky from light pollution. Construction and intermittent security lights could have adverse impacts if their design and installation does not consider the minimising of light pollution.

## Cultural Heritage

West Wickham Parish has a rich development history with two Conservation Areas, over thirty Listed Buildings and one Scheduled Monument.

Section 2.4.26 overlooks the conservation area in West Wickham High Street which includes the Grade II* St Mary's Church.

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[2] Ground Control, The Devana Centre for Environmental Recovery
https://www.ground-control.co.uk/insights/news/the-devana-centre-for-environmental-recovery/
[3] Greater Cambridge Shared Partnership, 2021
https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-08/LandscapeCharacterAssessment_GCLP_210831_Part_A.pdf
[4] West Wickham Neighbourhood Plan 2022, Section 4.62 - 4.63
https://www.scambs.gov.uk/media/21611/the-west-wickham-neighbourhood-plan.pdf

**WEST WRATTING PARISH COUNCIL**

clerk.westwrattingparishcouncil@gmail.com 13th January 2025

# West Wratting Parish Council

## Response to the request for comments on the Scoping Environmental Impact Assessment (EIA) Report for Kingsway Solar

West Wratting Parish Council has reviewed Kingsway Solar's scoping Environmental Impact Analysis (EIA) report and listened to the views of concerned members of the community we represent. In the comments presented here we highlight matters that we believe the applicant has wrongly proposed to scope out of the EIA, matters that they have inadequately scoped in, and some matters they have omitted entirely. Where necessary we also point out factual errors in the scoping EIA report.

The following bullet points summarize our key concerns, but other very important points are not listed here so our entire document should be read in detail.

- The scoping report has been put forward too early with too little information about the design of the scheme. The design should have been taken to a more mature stage before the scoping EIA report was presented to the planning inspectorate and to the statutory consultees for comment.
- The scoping report has clearly been rushed, particularly with regard to the late addition of area C, which requires much more rigorous justification for its inclusion in the scheme.
- Surveys of biodiversity that have already been completed for areas A and B must now be carried out in full for area C; the applicant's claim that the A and B results can be used for C are clearly wrong given the different landscape character of area C.
- The scoping EIA's risk assessment for Major Accidents and Disasters is cursory at best and cannot possibly justify the scoping out of this important matter from the EIA. The applicant needs to carry out a much more rigorous risk assessment exercise on hazards that they have failed to even consider in this scoping report. The risk assessment must explicitly acknowledge the high level of uncertainty related to the 'experimental' nature of such large-scale solar farms and the expected increase in extreme climate events during its 40 year working life.
- It is essential that the risk of a Major Accident or Disaster caused by fire in the scheme's Battery Energy Storage System (BESS) is scoped in for further assessment as part of the EIA. We have particular concern about the close proximity to numerous dwellings in area C, but the suitability of the entire scheme area for BESS must be seriously questioned because water used to put out a lithium battery fire could contaminate the underlying principal chalk aquifer that supplies water to the whole of Cambridgeshire.

- The scoping EIA inadequately assesses the risk to a regional source of groundwater during the operation phase of this development. Groundwater must be scoped-in for further assessment in the EIA and ES.
- Because of the numerous errors and oversights in the scoping EIA report related to water this topic must be further assessed in the EIA for inclusion in the ES.
- The applicant's claim that there is less BMV agricultural land in areas A and B than found by earlier analysis must be treated with caution until there is full transparency about the testing methodology and/or the survey is confirmed by an independent source.
- There has been insufficient effort to justify the use of BMV land by the proposed solar farm. A much more rigorous case needs to be presented by the applicant that they were unable to find any suitable location with non-BMV land.
- Parish Councils are not listed as consultees in relation to landscape and visual matters. As the closest layer of local government to many of the key receptors being assessed within the Landscape and Visual Impact Assessment (LVIA) our advice should definitely be sought.
- We can advise from our local knowledge that the existing local roads are not currently suitable for carrying the expected volume of construction HGVs, particularly in the case of area C, Six Mile Bottom Road and West Wratting High Street.
- The Population baseline conditions for area C have not been adequately researched and the list of community assets for West Wratting is incomplete. The section on development land and businesses does not mention area C at all. Population matters, including the impact of the solar farm development on resident's health, must be scoped-in to the EIA.

# Background about West Wratting

## Character and nature of our community

Most of the ~200 houses in West Wratting are situated close to the High Street with others in more isolated parts of the parish. Many of its ~500 residents have lived in the village for a large proportion of their lives while others have chosen to move to West Wratting in order to enjoy the countryside. In choosing to live here they sacrifice good transport links and the convenience of having a local shop in order to enjoy a more peaceful country lifestyle. Many residents, particularly the dog walkers, enjoy the rural setting for regular walks on unpaved footpaths where we can enjoy seeing the changing seasons as arable crops grow, ripen and harvest, and trees come into leaf offering refuge for wildlife.

There is a good community spirit within our village which is evident when visiting the monthly café held in our village hall. Our Church has regular services and seasonal events such as Easter egg hunts, barbecues, and village fetes in the church grounds. These events bring all age groups together.

Figure 1. New Year's Day walk on footpaths around West Wratting Park 1/1/24

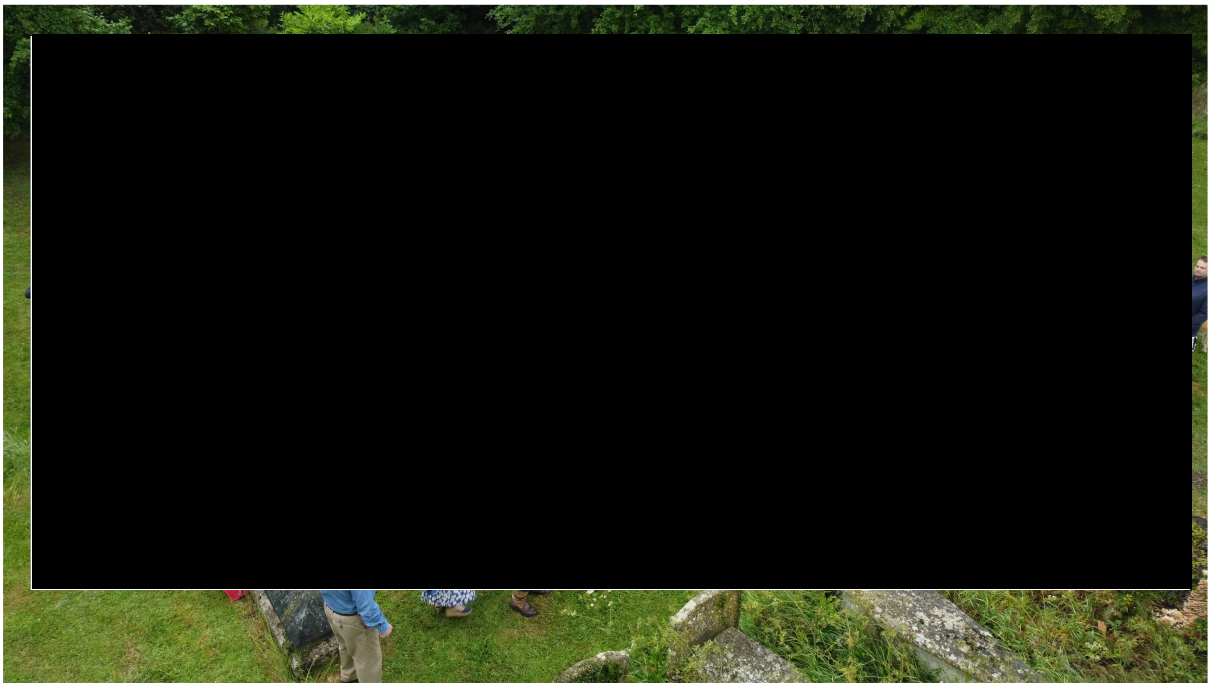

Figure 2. In the grounds of Saint Andrews Church 2022

## The landscape of West Wratting and the development areas

The solar farm's development areas A and B are in a chalk hills landscape (7A in figure 3), whilst area C is a wooded claylands landscape (4D, 4E). The entire area of the proposed solar farm is on landscape classified as good condition with strong character, which the Greater Cambridge Shared Planning's landscape assessment judged to need a management strategy to "conserve" so that the local distinctiveness and sense of place are appropriately protected, managed and enhanced.

The parish of West Wratting - which contains ~65% of the solar farm area - includes both chalk hills and wooded clayland landscape

### Eastern chalk hills landscape

The chalk hills Landscape Character Area (LCA), 7A in figure 3, is a gently rolling rural landscape dominated by large scale arable production. All of development area A and most of area B are in this LCA. Its fields are large with a regular pattern, enclosed by low hawthorn hedgerows. Key characteristics are scattered broadleaf, coniferous and mixed shelterbelts, as well as lines of trees planted along roads. The 13 wind turbines at Wadlow Wind Farm in West Wratting parish are prominent features on the skyline of many views. Other than a few isolated houses there are no areas of habitation in areas A and B.

In this area Fleam Dyke is a distinctive historic linear feature, as is the Roman road which forms the southwestern boundary. Both are sites of special scientific interest (SSSIs). The Harcamlow Way long distance path follows the route of Fleam Dyke, which contains a fragment of lowland calcareous grassland that adds diversity to the otherwise simple landscape. The E2 European Long Distance Route follows the route of the Roman road, and the ancient Icknield Way trail follows straight tracks and roads in the northeast. These walking trails provide connectivity with the generally sparse Public Rights of Way (PROW) network elsewhere in this landscape area, and connect to recreational and historical features in neighbouring LCAs.

### Wooded claylands landscape

Area C of the scheme is mostly a wooded claylands Landscape Character Area, 4D and 4E in figure 3, which is a rolling, tranquil, rural landscape with scattered and some ancient woodland. Arable fields are generally large, enclosed by well-trimmed, sometimes gappy hedgerows with occasional hedgerow trees, and straight open ditches.

The small villages of West Wratting and Balsham are linear and have a wooded setting, with mature hedgerows and trees that contribute to their rural character. These settlements are interspersed with isolated farms. West Wratting Park (Grade II*) forms the eastern edge of West Wratting village, introducing parkland character to the landscape with enclosing fields that give it a soft edge. The landform and woodland cover combine to create long expansive views which extend to distant wooded skylines. The area generally has a remote, rural character.

The routes of the historic Icknield Way and Harcamlow Way pass through this LCA, linking the area with historical and ecological sites in neighbouring LCAs. Part of their route is along the distinctive linear Roman Road in the south of the LCA.

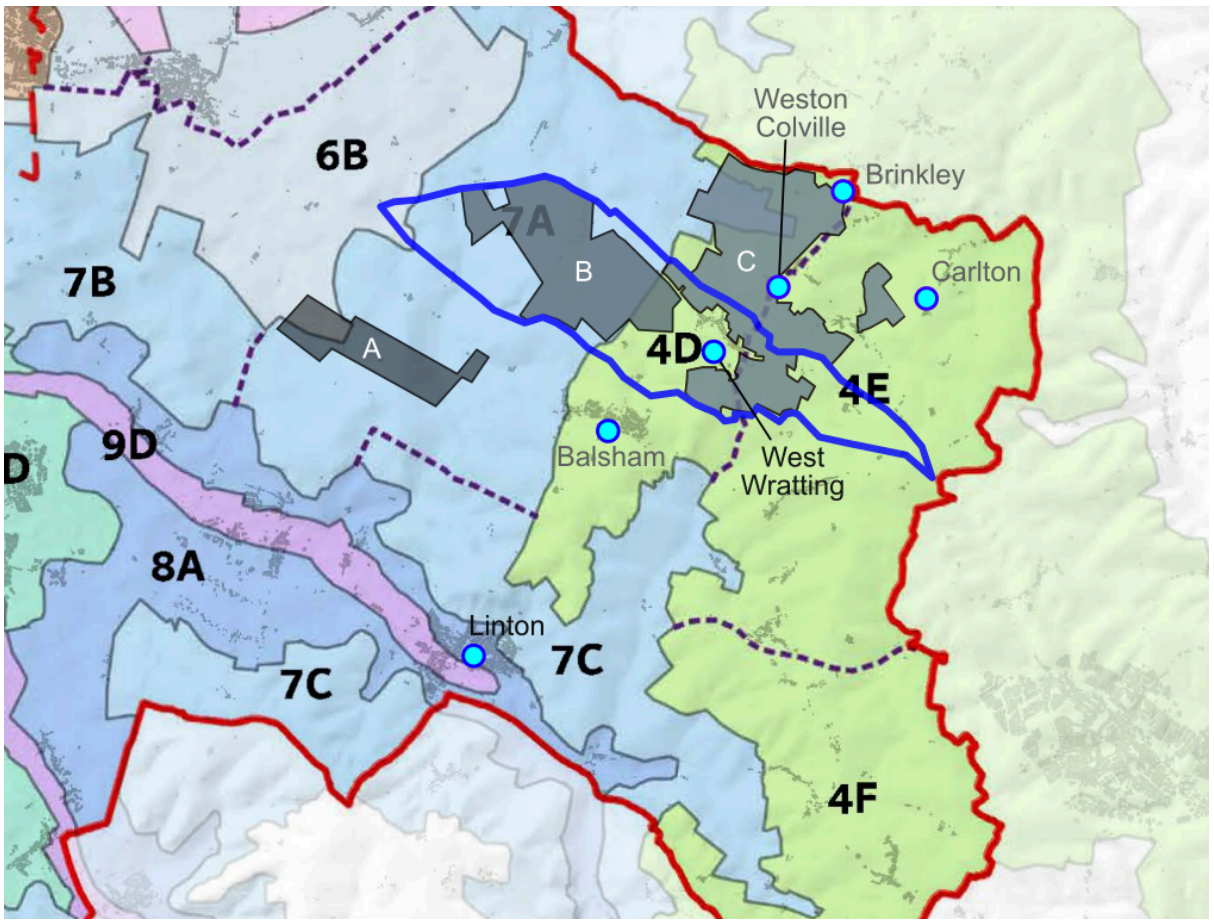


Figure 3. The boundary of West Wratting Parish (blue) and the solar farm areas A, B, C (dark gray) superimposed on the landscape character map (figure 4.1) from the Greater Cambridge Shared Partnership's Landscape Character Assessment[1].

## General difficulties and uncertainties

There are a few general difficulties and uncertainties with the scoping EIA report mostly relating to its lack of sufficient information. In addition, errors in earlier chapters (corrected in later sections) reveal that some parts were written before area C was added to the scheme, whilst other parts appear to have been copied from documentation about other NSIP solar farms, e.g., the list of directions and distances of habitats from the solar farm in section 4.11.6 suggest it is copied from the Sunnica documentation.

Perhaps the biggest uncertainty results from the inherent unreliability of data about the design, installation and operation of such an unprecedentedly large-scale solar industrial facility. This means that the requirement to identify "*any difficulties, uncertainties and assumptions*" (4.5.5) must be rigorously met in the EIA. This point is particularly relevant to the final claim in 4.7.1 that the 'worst-case' scenario of the decommissioning phase will be

[1] Greater Cambridge Shared Partnership *Landscape Character Assessment* (2021). https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-08/LandscapeCharacterAssessment_GCLP_210831_Part_A.pdf

carefully assessed by the EIA. Since decommissioning will not begin until 2070, there is very limited ability to genuinely assess this period, and this self-evident knowledge gap should clearly be stated as a major risk in and of itself.

At this stage the internal layout of the scheme (e.g., position of solar panels, batteries, etc.) has not been published. In fact the scoping report repeatedly says "*the detailed design of the Scheme is still emerging, as are the environmental surveys and assessments required to support the planning and EIA process*". Section 2.5.3 tells us that the applicant intends to use the 'Rochdale Envelope' approach[2] to delay finalising details of design, with some of them possibly not being decided until after the development consent order (DCO) is made!

It's currently unclear if or how land used by Wadlow Wind Farm (in area B) will be used by the solar farm, which appears to occupy the same space in published plans. This creates lots of uncertainty about how Fleam Dyke will be affected by Kingsway solar farm.

The design of the scheme should have been taken to a more mature stage before the scoping EIA report was presented to the planning inspectorate and to the statutory consultees for comment; in our opinion it was rushed through too early in the design process.

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## Choice of location (alternatives considered)

Chapter 3 of the scoping EIA report discusses "*the reasonable alternatives studied by the applicant*" that must be included in the environmental statement (ES). We posit that the route by which the applicant arrived at the area considered in their scheme was much more haphazard than they describe in sections 3.2.2 onwards; this is particularly true of area C, which was clearly added to the plan sometime after parts of the scoping EIA report had been written.

The sole criteria offered in 3.2.2 of finding 'sufficient land offered by willing landowners' proximate to the grid is neither a logical nor credible basis for identifying the 'best' site for such a vast solar industrial complex. Particularly in light of the explicit planning protection of the rural open countryside, Best Most Versatile (BMV) arable land, residential amenities and water protection, the claim in 3.2.4 that 'careful consideration of site options' led to the selection of area C is self-evidently false.

Material presented by Kingsway in March 2024 (that we have on record[3]) stated that the original parcels of land, A and B, were chosen primarily because they could use the existing national grid infrastructure. That encouraged some initial local support for the scheme and enabled them to obtain provisional lease agreements from some landowners. Despite that grid connection no longer being available the applicant has chosen to continue with A and B

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[2] *Nationally Significant Infrastructure Projects - Advice Note Nine: Rochdale Envelope*, https://www.gov.uk/government/publications/nationally-significant-infrastructure-projects-advice-note-nine-rochdale-envelope

[3] *Kingsway Solar Farm, Balsham Parish Council Introduction Meeting, 18 March 2024* https://westwratting.org.uk/wp-content/uploads/2024/12/240318_Kingsway-presentation.pdf

in their plan by adding the development of a new ~15 km pylon link to a substation that has not yet been built. The applicant is also now saying that the main reason for including areas A and B in their plan is that they have agreement from the landowners. The argument has switched! We agree with Brinkley Parish Council's comments in response to the non-statutory consultation[4] that the selection process was perverse and a more rigorous process should have been used to establish possible locations where the least harm would be caused.

The Table in 3.2.5 outlining environmental considerations in site selection simply notes the presence of several sites of special historic, ecological and scientific importance but does not say anything about how the significance of these sites was, will be or should be assessed. In addition, this table substantially underestimates the degree of flooding in the area - particularly in area C around Weston Colville.

Although it is noted in 3.2.6 that topography and aspect were considered in selection of the site(s), it is not at all clear how this was factored in. Large parts of areas A and B are elevated, and thus would create highly visible industrial facilities which could be seen from several miles away. Other areas, for example, slope due west, making them especially ill-suited for solar energy generation.

Section 3.2.1 says that site selection was informed by local planning policies for the relevant county and district councils. A development of this scale in this landscape clearly contravenes those local policies. In reality the local planning policies are being ignored. Similarly, section 3.2.4 says that a key factor in choosing the location was land characteristics and environmental qualities; this is despite the fact that the three land areas have a "rolling rural landscape"[1] - making it impossible to screen large areas of land from the historic linear features in this area (Fleam Dyke, Ickneild Way, etc.) - and that the underlying principal chalk aquifer calls into question the safety of including BESS as part of this scheme.

Table 3-1 states that "*Consideration was given to the proximity of nearby sensitive human receptors which include residential dwellings, populated areas and villages".* This may well be another example of something that was written before area C was added to the scheme; it can possibly be considered true for areas A and B, but is definitely not true of area C which effectively surrounds several villages with a combined population of more than 1500 people - with more houses being built. That claim goes on to say *"The Applicant also considered the location of PRoWs in the area and sought to identify a site which would reduce impact on these routes*". Again, this must have been written before area C with its numerous PRoWs was added to the scheme, and is inconsistent with what is stated elsewhere in the report[5].

We believe that in truth area C has been added to the scheme late and in a particularly careless way. There is currently no Land Use Framework in the UK but the most respected

[4] *Brinkley Parish Council: Response to non-statutory consultation re Kingsway Solar Proposals* https://westwratting.org.uk/wp-content/uploads/2024/12/20241212-Kingsway-Solar-stage-one.pdf

[5] e.g., Section 6.8.5 says "*There are numerous PRoWs which are within, intersect or are located within 500 m of the site*", and paragraph 2.4.31 acknowledges that of the 174 PRoW inside the scheme,the largest number are in area C.

work to identify where solar panels should be located[6] shows suitable land in the vicinity of areas A and B but not C.

In summary, the environmental statement needs to present a much more rigorous justification for the inclusion of area C in the scheme than is suggested by chapter 3 of the scoping EIA report.

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## Major accidents and disasters

Section 5.6 concerning the risk of major accidents or disasters significantly downplays the need to assess these risks, and their potential impact, on the grounds that: a) such events are by definition rare, b) the existing guidance at national and international level already covers them and c) risk management will be continually built into the scheme as it evolves. These justifications are insufficient, and this section is one of the most problematic in the entire scoping EIA report. We strongly contend that major accidents and disasters must be scoped-in for further assessment in the EIA and ES.

### BESS safety

The proposal to exclude major accidents and disasters from the scope of the EIA despite recognising (in table 5-2) that there is a fire risk associated with the Battery Energy Storage System (BESS) shows that the applicant has not adequately researched this topic. The massively simplistic justification that "*the mitigation in place is generally sufficient to manage vulnerabilities to major accidents and/or disasters without the need for additional mitigation in most circumstances*" (5.6.6) and that *"no significant effects in relation to major accidents and disasters are anticipated"* (5.6.6) shows that the applicant does not understand the impact of such an event both locally and regionally - and alone justifies the need for this matter being included for further assessment in the EIA and ES.

BESS fires are rare but when they do occur the impact is severe and potentially life threatening so the overall risk is undeniably high as detailed in numerous articles[7] and in advice from the National Fire Chiefs Council[8]. It is certainly not comforting to read in section 2.10.8 of the scoping EIA that "*all safety concerns around the BESS element are addressed in so far as is reasonably practicable*". From what has been learnt from BESS fires at fairly

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[6] *How England can produce more onshore renewable energy fast*, Friends of the Earth and Environmental Intelligence Centre at Exeter University (2024), https://policy.friendsoftheearth.uk/insight/how-england-can-produce-more-onshore-renewable-energy-fast and particularly the map at https://mapst.ac/foe/onshore-renewables-england#12.13/52.13775/0.30297

[7] e.g., *Safety of Grid Scale Lithium-ion Battery Energy Storage Systems*, https://www.researchgate.net/publication/352158070_Safety_of_Grid_Scale_Lithium-ion_Battery_Energy_Storage_Systems

[8] *Grid Scale Battery Energy Storage System planning – Guidance for FRS*, https://nfcc.org.uk/wp-content/uploads/2023/10/Grid-Scale-Battery-Energy-Storage-System-planning-Guidance-for-FRS.pdf

small scale facilities (~1 MW) experts have warned that a fire at a very large facility (>100 MW) would have very severe and potentially catastrophic consequences[9].

Lithium batteries burn intensely and all current designs likely to be used for this project produce a mixture of combustion products that includes hydrogen fluoride, HF, the most highly corrosive acid[10]. The dangerously toxic plume of acid vapor can be dispersed over many kilometers by the prevailing wind, and the cooling water that must be used to prevent escalation of the fire to other battery units becomes contaminated with the acid. The scoping EIA acknowledges that there are risks of the contaminated fire water entering surface watercourses or the ground (2.7.37), which is particularly concerning given the scheme is situated over a principal chalk aquifer (2.4.22) that is of regional importance in supplying drinking water to Cambridgeshire, Suffolk and further afield.

Many experts in this area agree that because of the fire risk and, in particular, the consequential spreading of HF, sizable lithium batteries should not be located anywhere near urban areas, as in this proposal involving West Wratting, Weston Colville, Brinkley, Carlton and Balsham. A safe distance is difficult to determine as it depends on atmospheric conditions, but an absolute minimum distance should certainly be no less than 1 km if adequate warning and evacuation measures are in place. Were an atmospheric temperature inversion to coexist with the fire, the safe distance would be significantly greater, and at least twice that distance. The possible repercussions in terms of substantial legal claims for injury due inhalation of significant doses of HF by occupant in dwellings downwind of a battery fire must be very significant.

There needs to be a much more rigorous justification from the applicant for positioning lithium-ion batteries anywhere near residences or over a principal aquifer, and information about the layout and mitigation measures needs to be comprehensive and detailed; it also needs to be in the EIA, not just in a outline Battery Safety Management Plan as proposed in section 2.7.19.

## Other

Battery fires are only the most obvious known risk to the solar farm that may arise before decommissioning of the solar farm begins in 2070.

The increasing incidence of extreme climate events is the most obvious cause of potentially catastrophic damage to the solar farm with potentially serious colloquial damage to nearby villages. Events in 2024 have shown this is not just alarmist talk, with significant damage occurring to the 50 MW Porth Wen Solar Farm in Anglesea[11] caused by wind during a storm,

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[9] *Arizona regulator warns of 'unacceptable hazards' of lithium batteries*, https://www.batteriesinternational.com/2019/08/28/arizona-regulator-warns-of-unacceptable-hazards-of-lithium-batteries/

[10] *Review of gas emissions from lithium-ion battery thermal runaway failure - Considering toxic and flammable compounds*, Bugryniec *et. al*. J. Energy Storage, 87 (2024) https://doi.org/10.1016/j.est.2024.111288.

[11] *Solar Farms and Wind Turbines Tested and Failed by Storm Darragh*, The Civil Engineer, https://www.thecivilengineer.org/news/solar-farms-and-wind-turbines-tested-and-failed-by-storm-darragh

and hailstone damage to the 350 MW Fighting Jays solar farm in south-east Texas[12]. Based on current climate predictions similar events in the area of Kingsway solar farm are not just possible in the next 45 years, but inevitable.

A related subject is flooding. The environmental Agency warns that the risk of flooding is increasing[13], with potentially 1 in 4 homes affected by 2050. Local knowledge tells us that area C of the scheme - particularly around Weston Colville - is already prone to flooding, and this will inevitably get worse. For this part of the EIA the applicant is wrong in simply using current data to assess risks to the solar farm and to conclude that "*the majority of the Site is within Flood Zone 1, and therefore considered to be low risk*"[14].

Other security issues are of human origin including the targeting of solar farms during warfare, vandalism, security breaches, data theft, mismanagement, misconduct, fraud, bankruptcy and market failure. At the very least an acknowledgement of the huge uncertainty surrounding the actual risks of this vast half-century industrial scheme should be acknowledged.

### Summary

It is essential that the risk of a major accident or disaster caused by fire in the BESS is scoped in for further assessment as part of the EIA and therefore considered in the ES. This is particularly the case in relation to area C which is in close proximity to numerous dwellings.

As part of the EIA the applicant needs to carry out a more rigorous risk assessment exercise on other hazards that they have failed to even consider in their cursory review, summarized in table 5-2; that simplistic listing of four items paired with reassuring prose is not a good example of responsible industrial planning.

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## Agricultural land classification

In the scoping EIA report section 6.4.5 (repeated in 6.8.5) the applicant says that a site-specific Agricultural Land Classification (ALC) survey was completed in spring 2024 for areas A and B and gives percentages of soil types (1 to 4) that were found to be present. They claim that 45.9% land in areas A and B is of grade 3a or better, and so is considered Best Most Versatile (BMV). This is a downgrading of the previous classifications for this land which found that all this area is BMV[15,16]. Another ALC survey is planned for area C in early 2025.

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[12] *'Golf ball-sized' hailstorms damage Fighting Jays solar project; Array launches hail tracking software*. https://www.pv-tech.org/hailstorms-fighting-jays-solar-project-array-hail-tracking-software/

[13] https://www.gov.uk/government/news/environment-agency-publishes-major-update-to-national-flood-and-coastal-erosion-risk-assessment

[14] Concerns about the Assessment scenarios to be considered by the EIA are considered elsewhere in this document.

[15] *Agricultural Land Classification map Eastern Region (ALC008)*, https://publications.naturalengland.org.uk/publication/127056?category=5954148537204736

[16] *Likelihood of Best and Most Versatile (BMV) Agricultural Land (ALC020)*, https://publications.naturalengland.org.uk/publication/6205542189498368?category=5208993007403008

The applicant's new survey is not referenced in any way so the stated ALC grades need to be viewed with some skepticism. Other applicants for solar farm projects have previously published the results of surveys that downgraded the quality of agricultural land using unspecified methodologies that were later shown to be incorrect by further independent surveying. The results presented by the applicant in the scoping EIA will need to be challenged by local authorities for this scheme.

In an early section of the scoping EIA report (table 3-1 in 3.2.5) the applicant says that "*planning policy seeks to minimise impacts on the best and most versatile (BMV) agricultural land (defined as grades 1, 2 and 3a) but it doesn't preclude its use for solar development and nor should it be a predominating factor in determining its location. Policy simply establishes a preference for development on land graded 3b, 4 or 5 and to utilise previously developed land, brownfield land, contaminated land or industrial land where possible*". Essentially the applicant is making an early case to ignore the guidelines from pretty much everywhere that solar farm developments should avoid using BMV cropland where possible[17] including National Policy Statements (NPSs)[18]. This is in preparation for the scheme causing "*likely significant effects relating to the availability of BMV agricultural land (adverse effects during all three phases)*", as stated in section 6.4.7.

In summary, we believe the degraded land classifications of areas A and B (and probably likewise for area C) should be treated with caution until there is full transparency about the testing methodology and/or the survey is confirmed by an independent source. Moreover, we think there has been insufficient effort (in section 3) to prove why the loss of BMV is justified, and a much more rigorous case needs to be presented that it was not possible to find non-BMV land that was available for lease and at a similar distance from a connection point to the national grid.

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## Landscape and visual amenity

Section 6.2 of the scoping EIA considers the effect of the scheme on landscape and visual amenity. In some respects, this scoping report pre-judges the outcome of the EIA; this cannot be right. We strongly contend that the scale, geographical extent and duration of the proposed development will cause widespread substantial and significant adverse landscape impacts, and prolonged adverse visual impacts[19]. These will be felt most keenly by the residents of West Wratting, Weston Colville, and the other villages that are in such close proximity to the scheme, particularly Area C.

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[17] *Planning guidance for the development of large scale ground mounted solar PV systems*, Building Research Establishment (BRE), https://files.bregroup.com/solar/KN5524_Planning_Guidance_reduced.pdf

[18] *NPS EN-3 - Renewable energy infrastructure*, paras 3.10.14-3.10.16 86 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1147382/NPS_EN-3.pdf and *EN-1 Overarching National Policy Statement for Energy*, para 5.11.12 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1147380/NPS_EN-1.pdf

[19] This is using the methodology of appendix C to judge the magnitude of the effect arising from the scale, geographic extent and duration of the scheme as 'substantial' for all residents, and the significance of change both for the region and community as 'significant'.

## The effect on residents

We maintain that the residents are not just affected by the impact on their public views and public visual amenity (i.e., the adverse effects on views and visual amenity at their place of residence, which is less important to planning as mentioned in 6.2.11) because as rural people their lives are intimately related to the landscape in which they live - probably more so than for urban dwellers. Consequently, the imposition of large scale utilitarian objects in the rural landscape that the residents love so dearly will cause them genuine grief.

This may not be obvious to people who are not themselves from a rural community. For example, the scoping EIA implies in section 6.2.5 (baseline conditions on visual receptor: settlements) that these changes won't impact the residents because the "*inward looking nature of many of the settlements*" will limit views of the scheme. To say "*there is theoretical potential to see elements of the scheme from the edges of these settlements*" pre-judges the outcome of the EIA and suggests that it was written by somebody who doesn't understand how rural dwellers live in their landscape. We don't just live on our high streets or view the outside world from the edge of our settlements. We live here because we have chosen to belong in the countryside. We get out and walk the pathways around our villages almost every day and so look beyond the settlement in which we live. In this respect the residents are also the main "*recreational users of PRoW [that] would likely be the most sensitive visual receptors of any change in the landscape associated with the Scheme"*, as recognised in section 6.2.5 (baseline conditions on visual receptor: recreational routes).

## The effect on West Wratting and PRoWs

The description of 'Landscape context' in section 6.2.5 of the scoping EIA does not mention any of the villages near areas A, B or C; instead it mentions villages and houses that are 12 km away and North of the A14, close to the recently approved Sunnica solar farm; this section appears not to have been written for this NSIP.

In section 6.2.5 on 'Visual receptors' the settlement of West Wratting and Weston Colville are described as "*directly adjacent to Developable Area C*". This is a poor and perhaps misleading description given that these villages are essentially surrounded by the development, as can be seen in figure 3 and figure 4. For example, from the West Wratting village centre from a North West direction right round to Southwest - over 270° - the village is surrounded by Area C. The text in this section also incorrectly says that just the outer edges of West Wratting are within the ZTV, which is the zone where the solar panels and substation are theoretically visible, but figures H1 and H2 clearly show that West Wratting is entirely inside the ZTV, as are Weston Colville, Weston Green, Willingham Green and most of Carlton. In and around these villages there will be more than just "*distant and filtered glimpses*" of the solar farm infrastructure. The huge scale of the development in area C means that the landscape immediately around the village will be changed from rural beauty to an industrial power station, and we will lose the countryside environment in which we've chosen to live.

The description in section 6.2.5 of the effect of the change in landscape and visual amenity on public rights of way (PRoW) downplays the quantity of these routes that will be affected, particularly in area C, merely saying there are "several PRoW within the study area". Elsewhere the report correctly says "*there are numerous PRoWs which are within, intersect*

*or are located within 500 m of the site*", and paragraph 2.4.31 acknowledges that of the 174 PRoW inside the scheme, the largest number are in area C.

The potential for significant landscape and visual effects during construction, operation and decommissioning of the scheme are acknowledged in 6.2.7. There are several references in section 6 to the landscapes - both chalk hills and clay woodland - having a rolling and gently undulating character with "*long distance and open views around the study area*". The elevated land in the middle of area B with its 13 wind turbines is visible from many miles away, particularly along the ancient Icknield Way long distance footpath, so co-locating the solar farm there (which appears possible from the published plans) would make the new infrastructure very visible. Given the character of this landscape it's hard to understand how the applicant can say "*it is likely that any significant [visual] effects would extend across a much narrower distance from the site boundary than the ZTV*". Because the panels will be higher than most existing hedgerows[20] and because the targeted area has a comparatively hilly, rolling and undulating landscape the panels will be very hard to screen from PRoW and roads in the development areas and wider afield; we do not believe the statement in 6.2.5 that *"hedgerows, shelterbelts, … and the gently undulating topography can provide substantial screening to obscure existing vertical structures".*

## Use of infrared lighting

It is proposed in section 6.2 (and 2.7.32) that non-continuous sensor-triggered infrared lighting is used to mitigate the impact of lighting on landscape character and visual amenity. West Wratting welcomes this because we have chosen to not have any street lighting in the village to preserve our excellent low levels of light pollution. Table 6.2.9 does say that this approach would be used in the construction, operation and decommissioning phases, but it also says that "*there may be need for occasional and temporary construction lighting*". Because this exception case is poorly defined and because construction is likely to last 3 years we request that lighting impacts on landscape character and visual amenity be scoped in for further assessment in the EIA and ES. Because this matter is important enough to be planned in the operational phase the extent and duration of any exception in the construction phase needs to be more clearly defined.

## Scoping questions asked in section 6.2.13

*Do you agree with the proposed consultees to be engaged with on this topic?*
Parish Councils are not listed as consultees in section 6.2.1. As the closest layer of local government to many of the key receptors being assessed within the Landscape and Visual Impact Assessment (LVIA) our advice should definitely be sought, particularly on the selection of appropriate viewpoints.

*Do you agree that the surveys proposed to inform the LVIA are appropriate?*
Section 6.2.4 says that surveys of the proposed developable areas were carried out during winter, spring and summer months. It seems unlikely that surveys of area C have been carried out in spring because other evidence from the report indicates that area C was added to the project later than spring 2024.

[20] 2.7.4 says the panels are "typically up to 3.5 m high".

*Are any receptors/assets/resources not identified that you would like to see included in the LVIA?*
No; however, it's important to understand how much more profoundly residents of rural villages will be affected by changes to their surrounding landscape and visual amenity than urban dwellers, as described above.

*Do you agree with the proposed additional (secondary and tertiary) mitigation measures and is this mitigation appropriate?*
We have to express our deep skepticism about the statement made in section 6.2.6 that "*the landscape design will seek to deliver landscape enhancements over and above the requirement to simply mitigate adverse effects*." Without some explanation about the details of this or examples this sounds extremely unlikely. Similarly we cannot believe that *"the scheme will be designed sensitively with consideration to complementing the local character"* (6.2.6). In addition, section 6.2.10. says that a mitigation strategy will be developed that will deliver significant "*green infrastructure connectivity*", but the applicant has already told WWPC in a private meeting that the residents of West Wratting will not be able to take direct advantage of the green energy generated by the solar farm.

*Do you agree with the landscape and visual receptors that are proposed to be scoped in and out of further assessment?*
On the whole yes, but we do not accept some of the judgements made in the scoping - surely, those judgements can only be made by the EIA itself. We also request that the impact of lighting on landscape character and visual amenity remain in scope.

*Are there any specific viewpoints that you would like us to consider and/or illustrate as a photomontage?*
Suggested viewpoints of and from heritage assets are shown in Appendix A which includes links to photographs from those viewpoints. These assets include views of the landscape from along the linear features of the Icknield Way, Fleam Dyke, Harcamlow Way and the Roman Road. It will be important to use views that will show the significance and extent of changes to the settings of the Grade II* listed buildings that are inside or on the boundary of area C. This includes land inside the scheme that is immediately adjacent to the churches at West Wratting and Weston Colville, and the large area of land to the South East of the West Wratting Park House, which was a designed parkland setting for this early 19th century manor house.

*Are there any other developments which you consider it will be necessary for us to address in a cumulative landscape and visual impact assessment?*
It seems unfair not to include the existing presence of 13 wind turbines in the middle of area B, and the pylons that already exist to connect them to the existing substation at Burwell.

# Cultural Heritage

## Listed buildings

West Wratting has 28 listed properties, many of which are in the Conservation Area that runs along the northeast side of the High Street, directly adjacent to Area C of the proposed solar farm.

Paragraph 2.4.24 of the scoping EIA report incorrectly says "*there are no listed buildings within the developable areas*"[21]. In fact, although there are no listed buildings in areas A and B there are three listed buildings that are well inside area C including a grade II* early 19th century manor house that is in a designed landscape setting.

1. II* **West Wratting Park House**
2. II **Stables at West Wratting Park**
3. II **Garden Wall at West Wratting Park**

There are several other listed buildings right on the boundary of development area C, including four of grade II*.

4. II* **Windmill at Mill Cottage, West Wratting**
5. II* **Church of St Andrew, West Wratting**
6. II **Paddock Cottage, West Wratting**
7. II* **Concordia House, West Wratting**.
8. II **Cromwell Cottage, Carlton**
9. II **Lambra Cottage Restormel Cottage, Carlton**
10. II **Weston Colville Hall** (surrounded)
11. II* **Church of St Mary, Weston Colville**
12. II **Barns, Pound Farmhouse** (2), Weston Green, which is missing from the scoping EIA report

In addition, there are numerous other listed buildings within a few hundred metres of development area C in both West Wratting and Weston Colville/Weston Green.

One area of particular concern is that surrounding the West Wratting Parish Church of St Andrew, which is a Grade II* listed building. Putting solar panels in the fields surrounding this would very significantly impact on the heritage value of this building, since the panels would be very visible. It would materially alter the atmosphere of tranquillity that the building currently possesses. Further, the churchyard is regularly used for community events

[21] This is another example that shows how the scoping EIA has not been correctly updated since area C was added to the scheme. This error is corrected in section 6.

(figure 2) and not only would the visual impact of the solar panels be considerable, but the possibility of glare from panels in the south easterly direction may sometimes render the space unusable.

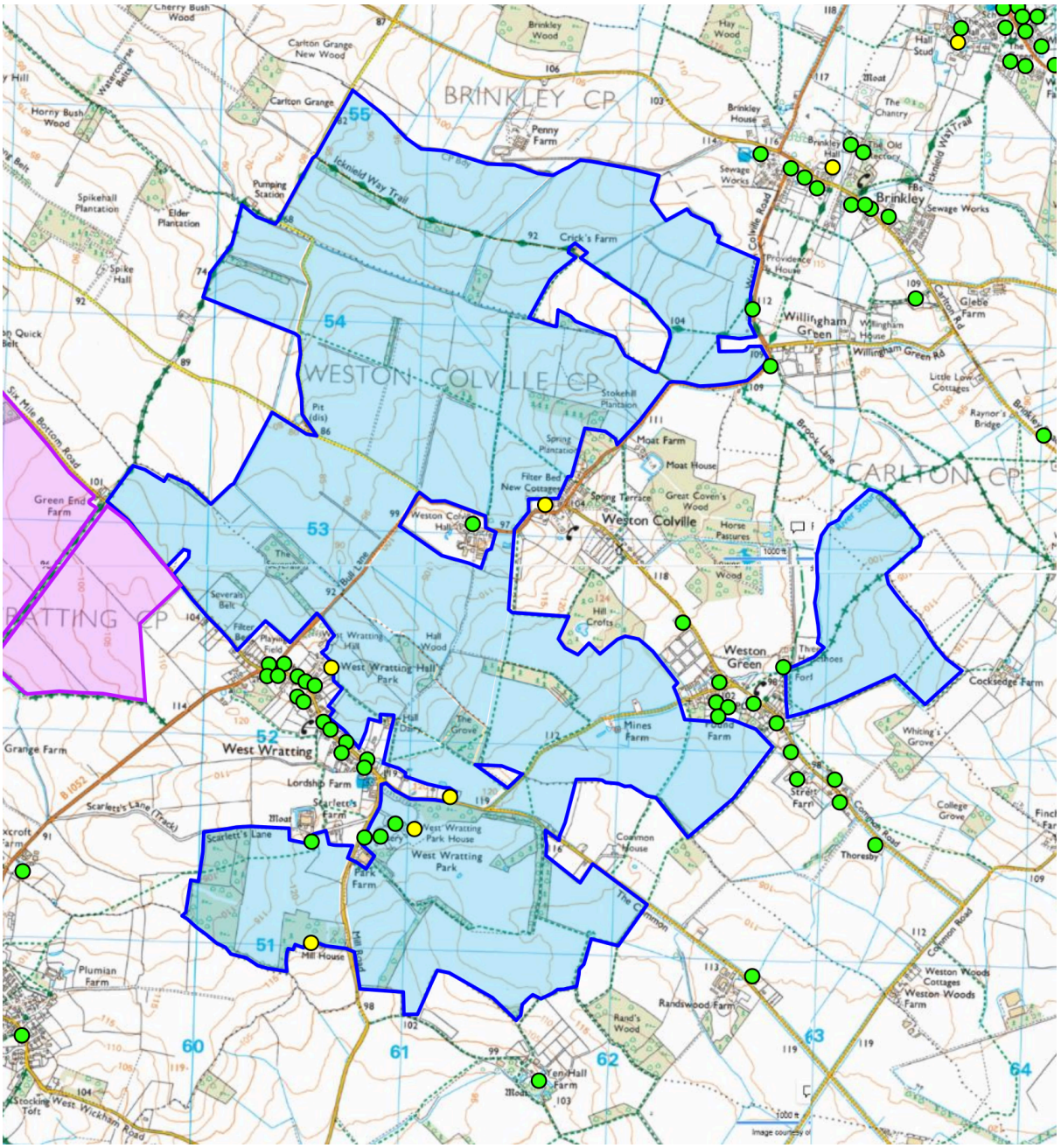


Figure 4. Listed buildings in and around area C (blue). Grade II buildings are shown in green and grade II* in yellow. It is similar to figure I10 in the scoping EIA report.

The significance of the scheme (using the methodology of appendix C) could be very large for some assets of high importance (grade II*) that are in or close to area C if their setting in the landscape is compromised by nearby and visible development. This is particularly true of the land to the South East of West Wratting Park House which has grand sweeping long distance views of an area which was once designed parkland and is now agricultural land. Obviously important views back towards the manor house from PRoWs on that land would also be compromised by development of that area.

Similarly, the settings of the churches at West Wratting and Weston Colville and of Concordia house - which are all right on the boundary of area C - must not be visually compromised by nearby solar farm infrastructure. The text of section 6.3 does not make clear the potential level of change to the setting of these assets. Section 6.8.5 says that both churches are located approximately 20 m from Area C but figure 10 shows their churchyards are immediately adjacent to the scheme boundary.

Designated and non-designated heritage assets are much more sparse in areas A and B of the scheme, but these areas and the grid connection corridor do contain the scheduled monument Fleam Dyke, and the remains of sites that were part of a prehistoric funerary landscape.

## Archeology

There have been two detailed surveys of the archaeology of West Wratting and Weston Colville. According to the 1991 assessment[22] the area has yielded several 'significant' prehistoric artefacts as well as later findings of equal if not greater importance - especially in the Medieval period. West Wratting and Weston Colville were 'substantial villages' by the eleventh century surrounded by 'extensive' fields, earthworks and settlement.

The 2008 report[23] is more detailed and describes numerous Neolithic and Mesolithic artefacts and tools as well as Bronze Age flints, Roman, Saxon and Medieval pottery and extensive earthworks. It concludes that the area is archaeologically considered to be a 'rich historical environment with evidence of activity from the early prehistoric period to the present', and notes that the impact of any development on any remaining archaeological evidence would be 'severe'.

Two potential heritage sites that do not appear to have been recorded so are not listed in the scoping EIA report are what's believed by locals to be a Roman villa (at ///depth.dolphin.geology) and well[24] (///daylight.purchaser.delved). These are in addition to numerous other records that were sent by the Archaeological Officer at Cambridgeshire County Council's Historic Environment Team in response to questions from concerned residents in this area. The applicant needs to liaise fully with that team so the impact on local archeology is comprehensively addressed in the EIA.

## Scoping questions asked in section 6.3.14

*Do you agree with the proposed consultees to be engaged with on this topic?*
In addition to the groups and organisations outlined, other interested parties that should be consulted include Cambridge Past, Present and Future (CPPF) as well as the Fleam Dyke and Roman Road Association (FDRRA). CPPF focuses on protecting and enhancing Cambridge's historic and natural assets, while the FDRRA champions the preservation of ancient pathways and their surrounding landscapes.

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[22] Mines Farm, Weston Green, Weston Colville, Cambridgeshire, G.Appleby, Cambridge Archaeological Unit (2008). https://doi.org/10.17863/CAM.101217

[23] *The Archaeology of West Wratting*, R.Boast, Cambridge Archaeological Unit (1991). https://archaeologydataservice.ac.uk/library/browse/issue.xhtml?recordId=1026253

[24] Possibly Cambridge Historic Environment Record (CHER) MCB17379.

*Do you agree with the proposed study area?*
Yes, but there are factors that have not been identified.

The proposed solar farm is in close proximity to Sunnica solar farm. Areas where the project might combine with other developments (i.e. grid connection at Burwell South) to produce cumulative impacts on cultural heritage should be assessed.

*Do you agree that the data sources listed to inform the EIA baseline characterisation are appropriate?*
This should also include consultations with local historians and community groups, together with any community-led projects such as the Balsham Map Project.

*Do you agree that the surveys proposed to inform the EIA baseline characterisation are appropriate?*
This section appears to be comprehensive, but this is a question that is best answered by South Cambridgeshire District Council Planning as we are not experts in this area.

*Are any receptors/assets/resources not identified that you would like to see included in the EIA?*
No further heritage areas identified in areas A and B.

The potential Roman villa and well in area C (described above) should be added to the lists of assets to be assessed, and there needs to be a more detailed look at the CHER records.

The impact of a solar farm on Fleam Dyke (scheduled monument) requires particularly sensitive management to preserve its cultural, archaeological, and environmental value. Any disturbance could compromise its archaeological integrity. The dyke contributes to the sense of place and continuity in the landscape, so visual or physical changes may undermine its perceived value as a historical landmark. This is particularly important in the context of any connection corridors and laying of cables (such as the connection between land areas A and B) across the Fleam Dyke path, as highlighted in section 6.3.9.

*Do you agree with the proposed additional (secondary and tertiary) mitigation measures and is this mitigation appropriate?*
The proposed secondary mitigation to setting (section 6.3.7) is poorly defined as "*most likely involve planting and landscaping*". More clarity is needed about what is appropriate for different cases. There is no mention of tertiary mitigation factors.

*Do you agree with the receptors/matters that are proposed to be scoped in and out of further assessment?*
Three of the listed buildings that (we assume) are scoped-in as parts of the "within the 2 km study area" group are grade II* listed buildings that are right on the boundary of area C[25]. These will have similar sensitivity to the 9 listed buildings that are fully within the site boundary so must be treated similarly. Weston Colville Hall is a grade II listed building that is in the middle of area C and entirely surrounded by land used by the scheme. It too should be treated with the same priority as buildings that are fully within the site boundary.

We assume (and hope) that the "*Construction activity [that] has the potential to directly impact on these assets …*" in column 3 of table 6.3.9 includes all activity that could physically

[25] i.e., the churches at West Wratting and Weston Colville and Concordia house.

damage the receptors, including indirect causes such as subsidence due to altered drainage.

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## Traffic and Transport

Section 6.7 of the scoping EIA report addresses traffic and transport issues, which local knowledge tells us will be considerable, particularly for the development of area C using Six Mile Bottom Road.

The traffic plan is outlined in chapter 2. Which says that "*construction access will be via the four junctions along the A11, and then onto the local road network; Six Mile Bottom Road, London Road, Balsham Road and an unnamed farm access via Worsted Lodge*" (2.7.33). These routes are shown on a poor quality map, figure 2.2. on page 37[26]. Because areas A and B of the scheme are fairly close to the A11 it may be possible to minimise use of the rural roads by using existing tracks in the wind farm complex and by building some additional access roads inside the scheme boundary; however, to reach the more distant area C from the A11 considerable use will need to be made of the local roads. Unfortunately these are probably not suitable for HGV traffic, and certainly not at the suggested average volume of 80-100 HGV movements per day[27], excluding construction staff transportation and ancillary construction traffic (section 2.9.5). The roads between A11 and area C have little to no ability to absorb this increase in level of heavy traffic without fundamentally improving their present condition. Six Mile Bottom Road is particularly concerning.

In table 6.7.5 Six Mile Bottom Road is shown as having sufficient space for "*two streams of traffic passing each other*". We are sorry to say that is nonsense. Two HGVs struggle to pass each other along that road at all, and in practice even two-way continuous car traffic is not possible at most times of the year because the effective road width is narrowed by deep potholes on both sides of the road. During the winter months there are very frequent occurrences of cars needing to be recovered by the RAC, AA, etc. because their wheels were damaged by driving too close to the edge of the road[28]. Any increase in HGV traffic will further degrade the quality of that road, possibly making it even more of a hazard for road users. Without major resurfacing along the entire 3 mile length of this road from West Wratting to Six Mile Bottom (///overlaid.stretcher.deprives to ///chatted.shape.marzipan), and widening in some locations, this road is impractical for construction vehicles. Simply adding more passing places will not be sufficient.

Near the village of West Wratting Six Mile Bottom Road has no footpath, causing residents - including school children - to have to walk on the road. This route has been classified as dangerous by Cambridgeshire County Council Passenger Transport Team due to having no visibility and no escape from traffic[29]. Construction traffic should not be allowed to use that section of road unless a safe route is first provided for pedestrians. The High Street in West

[26] Elsewhere (6.7.2) reference is made to map 2-3 showing transport routes, but that does not exist.
[27] A parishioner who has worked on similar projects estimates ~120 HGV movements per day for a project of this size.
[28] At peak times this occurs almost daily.
[29] Communication to West Wratting Parish Council, 8th January 2024

Wratting (and other small villages) are also narrow, with poor or non-continuous footpaths. There must be no use of roads through the centre of villages by HGV construction traffic. Further, there are two locations in the High Street of West Wratting which are used by buses for the collection and return of both primary and secondary school children. One is close to the junction with Six Mile Bottom Road and the other close to the Chestnut pub. The safety of these children should be paramount and there should thus be no use of the High Street by non-HGV construction traffic between the hours of 07:30-09:00 and 15:00-16:30.

The quality of The Common road at the South end of West Wratting between the Mill Road and High Street junction (///yield.ranks.tweed) and the junction with Chapel Road (///streaks.ringers.toasted) is also extremely poor and would rapidly degrade further if subject to a higher volume of HGV traffic. In this case the potholes extend across the road rather than just being at the sides. This stretch of road also has no footpath, with little opportunity for pedestrians to escape from the roadway to escape traffic. Again, it must not be used by construction traffic without improving pedestrian safety and resurfacing.

Section 6.7.3 indicates there is only limited and rather old baseline data from the Department for Transport (DfT) for traffic using the roads around West Wratting. Our own community speedwatch data shows that there has been a considerable increase in traffic in the last few years. Section 6.7.4 acknowledges that "*supplementary traffic surveys may be required*" where data is poor, but this should be revised to "*will be required*". The proposal to use neutral 24 hour data is flawed because there is much seasonal variation in local agricultural traffic so sampling methodologies need to take account of this. It is noted that there is no indication at this stage of construction traffic volumes, which will only be known post-design. The EIA will have to take the full design conditions into account.

In summary, section 2.9.9 says that "*existing local roads would be utilised to access the site, subject to the suitability of these roads to carry HGVs*". We can advise from our local knowledge that the existing local roads are not currently suitable for carrying HGVs, particularly in the case of area C, Six Mile Bottom Road and West Wratting High Street. There is significant ambiguity in the scoping EIA around access to areas B and C, which may cause heavy traffic flows through the nearby villages. Traffic baseline data is poor, and the data collection methodology appears inappropriate for the seasonal nature of local traffic.

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## Biodiversity, habitats and wildlife

Section 6.1 of the scoping EIA report is concerned with the impact of the scheme on biodiversity and wildlife. Relevant surveys have already been carried out in areas A and B but not yet for area C or for the connection corridors, so these two regions are dealt with separately in the tables of matters to be scoped in and out for further assessment. We wish to question the scoping out of some receptors from areas A and B, and challenge the justification for scoping out many receptors for area C without even doing surveys.

## All areas

Section 4.11.5 notes that the Habitats Regulation Assessment (HRA[30]) exercise will be applied only for 'protected national sites' within 10 km of the scheme, but given the extensive biodiversity of the entire area affected by the scheme – which is one of the key regions of biodiversity recovery in the 'nature deprived' Cambridgeshire region as a whole – a much more inclusive range of ecologically significant habitats should be assessed. For example, although Fleam Dyke (SSSI and Scheduled Monument) is not a special area of conservation (SAC) we believe an HRA should be carried out there because it is close to areas A and B, and has distinctly different species-rich chalk scrub and grassland priority habitat that is rare in Cambridgeshire and uncommon in south, central and eastern England[31] (page 95). An HRA should also be carried out on Lower Wood in Weston Colville and on all areas of woodland >5 acres within the scheme as many of these are home to rare and endangered species of plants, animals, fungi, insects and microbiota.

Due to the ecological importance and potential for biodiversity enhancement calcareous grassland should not be scoped out from further assessment in the EIA. It is also not acceptable to scope out brown hares as a biodiversity receptor because they are listed in the UK Biodiversity Action Plan (BAP) due to long-term decline[32].

## Area C

Incomplete surveying is highlighted in section 6.1.13 as a "*difficulty and uncertainty*", and 6.1.3 says that Area C and the connection corridors "*will be subject to survey in 2025*". We believe that this subject area is so important and so reliant on field surveys that the scoping EIA should really not have been put forward for consideration until after those surveys were complete.

Section 6.1.9 states:

> *"Whilst the Inter Array Connection Corridors and Developable Area C – East have not been subject to ecological baseline surveys, their close proximity to Developable Areas A - West and B - Central means that they are known to contain similar habitats and be subject to similar constraints to Developable Areas A and B"*.

As described elsewhere in the scoping EIA report and shown clearly in figure 3 area C is a distinctly different landscape character to areas A and B (being wooded clayland rather than chalk hills), so the ecology and habitats are likely to be different. This is definitely apparent to those of us who live here. Moreover, the relevant waterbodies for area C are different from those of areas A and B[33].

Because of these differences we believe section 6.1.9 is not an adequate justification for scoping out a number of receptors/matters from further assessment in area C, including:

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[30] *The Habitats Regulations: What's at risk and how can we build on and strengthen the Regulations to be more effective for nature and people?*
[31] https://designatedsites.naturalengland.org.uk/PDFsForWeb/Citation/1001069.pdf
[32] UK Biodiversity Action Plan, Joint Nature Conservation Committee (JNCC). https://jncc.gov.uk/our-work/uk-bap/.
[33] A and B have Swaffham-Bulbeck Lode and Bottisham Lode-Quy Water, whilst for area C the relevant waterbodies are the Stour (u/s Wixoe) and Granta.

woodlands, rivers, streams, hedgerows, reptiles, non-ground nesting birds, peregrine, barn owl and other raptors, bats, badgers, otter and water vole (table 6.1.9 from pages 157-165). Surveys of all these matters must be carried out for area C as they have been for A and B.

The error in the argument presented in section 6.1.9 (above) is emphasised by the justification that's given for scoping-out badgers from area C, which is that "*the design will seek to avoid all known setts*" (6.1.9 on page 164). The aerial survey mentioned on page 118 is unlikely to have located all badger setts in area C[34], so without carrying out a proper land-based survey as was done in areas A and B the existence of all setts will not be known.

We would like to point out that barn owls are known to nest and hunt in area B (particularly at ///mouse.snuck.humidity) and C (near ///spreads.importing.pays) in addition to area A which is mentioned on page 151 of the scoping EIA. Water vole have also lived in area C, as do many bats.

We would like to comment that the difficulties and uncertainties section (6.1.13) should include acknowledgement that most if not all research data about the effect of solar farms on biodiversity, habitat and wildlife have been generated from much smaller scale solar arrays, and there is considerable uncertainty associated with extrapolating the findings to a scheme of this size.

In summary, we must respond "no" to the scoping question in section 6.1.14 - *Do you agree with the receptors/matters that are proposed to be scoped in and out of the EIA?* The following matters must be scoped in for further assessment by the EIA and ES by carrying out surveys in area C (and the connection corridors) as they have been for areas A and B: woodlands, rivers, streams, hedgerows, reptiles, non-ground nesting birds, peregrine, barn owl and other raptors, bats, badgers, otter and water vole. Furthermore, because of its proximity to areas A and B an HRA should be carried out on Fleam Dyke, and calcareous grassland and brown hares should not be scoped out from further assessment in the EIA.

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## Water and flooding

The topic of water and flooding is addressed in several places in the scoping EIA document and various errors in the report indicate that it was not adequately reviewed after the late addition of area C to the scheme. For this reason water should not be excluded from the scope of the EIA, as proposed in 5.2.

In section 4.11.2 only two waterbodies are named for inclusion in a Water Framework Directive (WFD) assessment: Swaffham-Bulbeck Lode and Bottisham Lode-Quy Water. These are relevant for areas A and B, but the waterbodies for area C, Stour (u/s Wixoe) and Granta, are not mentioned. The latter two should also have a WFD assessment carried out. The Stour and Granta WFDs are later mentioned in 5.2.17 and 5.2.18.

Section 5.2.7 concerning the main rivers identified within the site boundary does not include the river Stour. This is described elsewhere as being "*located to the east of the site*" (5.2.8)

[34] e.g., the badger sett at ///pump.newlyweds.listening is not apparent.

and "*>5 km to the east of the Developable Area B*" (2.4.29), but which in fact has its headwaters in area C, as clearly shown on ordinance survey maps (figure 4, grid reference TL631532). It is therefore incorrect to claim that there are "no Main Rivers" within the site.

The same watercourse is described in the Flood Map for Planning, section 5.2.25, as a 'tributary of the River Stour' that runs through the centre an isolated land parcel in area C. A field survey would quickly show that it runs, in fact, directly adjacent to Common road and Weston Green, i.e., through the very centre of the village, and through both Category 3 flood zones and adjacent to several listed buildings.

Paragraph 5.2.32 claims that there are no expected changes within the site or study area which would change the characteristics of surface water runoff, using the Water Framework Directive and Environment Agency (EA) guidance as a point of reference. However the EA has already changed how they measure surface water runoff as of their most recent report in December 2024, making this claim immediately inaccurate. It is equally inaccurate in its expectation that further changes in the amount and characterisation of surface water runoff – or other Water Directive criteria – will not change within the future lifetime of the site, which is proposed to last until at least 2070.

Section 5.2.33 lists several bullet points justifying the scoping out of water considerations, including 'raw water requirements for plant cleaning' and other purposes, but does not consider how such water would be disposed of, not the need for even larger amounts of water to be kept on site for battery accidents – all of which would need to be prevented from entering the soil or other waterways as it would have become highly toxic.

Because of the numerous errors and oversights in the scoping EIA report related to water, only some of which are outlined above, this topic must be further assessed in the EIA for inclusion in the ES.

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## Groundwater

As mentioned in 2.4.22 and in the Hydrogeology section of 6.4.5 "*the bedrock deposits underlying the Site form a principal aquifer*". Using the methodology of appendix C the importance of this is very high because the principal aquifer provides a regionally important resource. The magnitude of impact caused by contamination or reduction of this resource could be major so the overall significance is very large.

Given the importance of this topic it is concerning that groundwater contamination is scoped out for the operation phase (6.4.9). The scoping EIA report justified this by claiming it "*will be appropriately protected by mitigation measures … put in place to reduce the potential for contamination during operation, such as measures to prevent discharge, losses or fire from the BESS*"; however, there is no detail about what these mitigation measures will be and no evidence presented that they will be adequate either for usual operation or in the case of a BESS fire. The applicant's simple assertion that the effects to groundwater are not likely to be significant because of the "*characteristics of the operational phase*" must be challenged because these 'characteristics' are not explained; this is a wholly inadequate assessment of the scheme's level of risk to the region's water supply.

The poor level of baseline understanding (e.g., “depth to groundwater is unconfirmed”) indicates that hydrogeology data must be improved, including surveys of developable areas A, B and C by independent third-parties.

In summary, section 6.4 inadequately assesses the risk to a regional source of groundwater during the operation phase of this development. This must be scoped-in for further assessment in the EIA and ES.

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## Population[35] and Health

Section 5.8.4 proposes that because human health impacts will be captured by other assessments "*human health is not subject to a stand-alone assessment and therefore a separate ES chapter is excluded from the scope of the EIA*". Although we agree that no stand-alone assessment is needed we would prefer the relevant material from other assessments to be collected into a separate ES chapter, particularly for the topics bulleted in section 5.8.1.

As we try to explain in ‘The effect on residents’ section of ‘Landscape and visual amenity’ there will definitely be a detrimental impact to the mental health and wellbeing of residents of rural villages that are in close proximity to the scheme - particularly so for those next to area C - who will face an immediate and enduring decline in their quality of life due to the changes. This impact on the population does not seem to be addressed anywhere in the scoping EIA document. We believe it should be part of health considerations in the EIA.

One specific area of concern is the proposed construction schedule of  07:00 to 19:00 Monday to Friday, and 07:00 to 13:00 on Saturday, with construction staff travelling to the site pre-07:00 and departing after 19:00 (for weekdays). We consider this to be unacceptable. To prevent detrimental harm to residential amenity for the majority of residents we recommended that construction hours should be limited to between 08:00 and 18:00 Monday-Friday, 08:00 and 13:00 on Saturday, and at no time on Sundays, Public Holidays or Bank Holidays.

Section 6.8.9 proposes that private properties and housing to be scoped out of further assessment with the justification that "*No significant effects are expected in relation to private property and housing*". We challenge this claim, based on an analysis of the effect of another solar farm on house prices[36] and on the experience of people who are currently trying to move. This definite socio-economic effect should be in-scope for the EIA with an explanation by the applicant of how they propose to mitigate this impact of their scheme.

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[35] Section 6.8 explains that the term ‘population’ in this chapter relates to impacts to the population in relation to the socio-economic effects which may occur as a result of the construction, operation and decommissioning of the scheme.

[36] *The effect of Botley West Solar Farm on local house values*, https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/General/General-Advice-00769-2-Attachment.pdf

Section 6.8.5 on baseline conditions has not been adequately researched for area C. The section on development land and businesses does not mention area C at all, and these (e.g., the stables and riding school) must be scoped into the EIA. Similarly the list of community assets for West Wratting is incomplete and this must be corrected when these are assessed further for the EIA. We want to mention in particular omission of the Brinkley woodland cemetery (///slimy.liquid.inventors) from the list of community land in area C.

## Assessment scenarios to be considered by the EIA

We have serious concerns about the overall approach to the EIA that will be taken by the applicant, as set out in chapter 4.

Section 4.7.1 outlining the scope of the assessment scenarios employs a comparison between the *Existing Baseline* (without the proposed scheme) and the *Future Baseline* (with the scheme) for evaluating the impact of the construction, operational and decommissioning phases. Given the accelerating pace of climate change, however, this comparative framework is inadequate as it should also include a Future Baseline *WITHOUT* the scheme. Recent figures from the Environmental Agency, for example, estimate a substantial increase in surface water ('flash') flooding, concluding that by 2050 1 in 4 homes in the UK will be flooded. A proper evaluation, therefore, would not simply compare the risks now without the scheme to the risks later with it, but instead would consider the cumulative effects of the risks LATER without the scheme ADDED TO the risks introduced by the scheme itself. In other words the assessment cannot simply be comparative: it must be both comparative and cumulative. This is because future proofing the scheme crucially depends on taking into account the cumulative changes affecting the existing baseline (e.g., soil, flooding, climate), as well as the added effects of the scheme itself (heat, erosion, accidents, etc.).

Existing baseline guidance based on parameters established from past experience are by definition incomplete for a novel industrial complex of this scale and complexity – especially one that is situated directly adjacent to numerous 'sensitive receptors' including villages, hundreds of acres of valuable arable land, vital niches of wildlife and biodiversity and primary water sources. The impact assessment must be candid and honest about these considerable uncertainties, not hide them under the fig leaf of supposed risk equivalencies based on shallow data findings and misleading comparisons.

# Appendix A:

This appendix shows important viewpoints that may potentially be impacted by the Kingsway solar farm scheme. Most of the views are related to cultural heritage assets, the Ickneild Way, or Fleam Dyke.

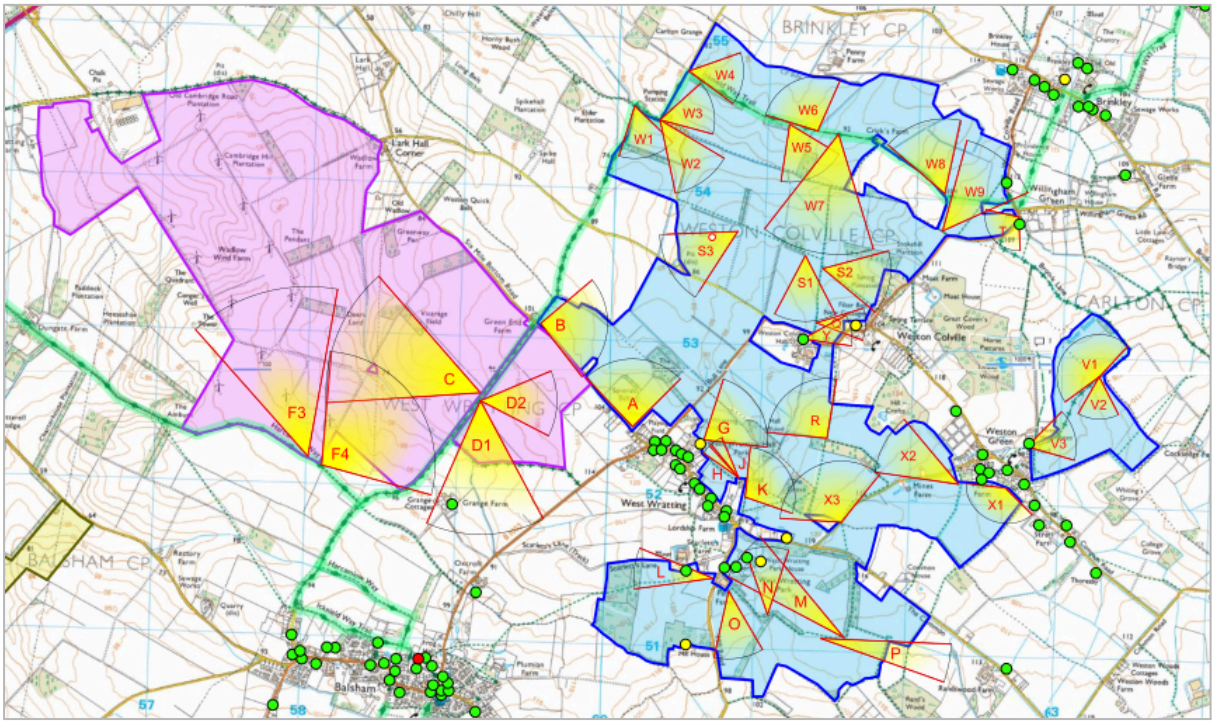



Figure A1. Important viewpoints in the development areas. Grade II buildings are shown by green circles and grade II* by yellow. Ickneild way and Fleam Dyke are shown by green lines.

A high resolution version of figure A1[37] and photographs from each of the viewpoints can be viewed online and downloaded from https://tinyurl.com/yc39pv6k

Rows with orange background are related to the Ickneild Way, or Fleam Dyke.
Rows with green background are related to grade II listed buildings.
Rows with yellow background are related to grade II* listed buildings.

| | summary | filename | viewpoint | direction |
|---|---|---|---|---|
| A | From N edge of West Wratting | A_aquatics.snacking.warmers_N.JPEG | aquatics.snacking.warmers | N wide |
| B | From Ickneild way at SMB road crossing | B_infringe.excavate.develop_E.JPEG | infringe.excavate.develop | E wide |
| C | From Ickneild way towards wind | C_caravan.coconut.g | caravan.coconut.gurgling | W |

[37] https://drive.google.com/file/d/1j3Cr5v4y0ZZNAAc5vJEyQP8rl4S98CKF/view?usp=sharing

| | | | | |
|---|---|---|---|---|
| | farm | urgling_W.JPG | | |
| D1 | From Ickneild way | D1_bronzes.slam.necklaces_S170.JPEG | bronzes.slam.necklaces | S 170 deg |
| D2 | Ickneild Way/Fox Road | D2_bronzes.slam.necklaces_E.jpeg | bronzes.slam.necklaces | E |
| F3 | From Fleam Dyke N | F3_mascot.renewals.weep_N.JPG | mascot.renewals.weep | N |
| F4 | Fleam Dyke montage N-E | F4_Fleam_montage_view.png | barmaid.damp.reset | N-E |
| G | From West Wratting church | G_imitate.flop.profess_NE33.JPEG | imitate.flop.profess | NE 33 deg |
| H | Across horse fields to WW church | H_alike.lovely.tuck_292.JPG | alike.lovely.tuck | WNW 292 deg |
| J | Across horse fields to WW church | J_alike.lovely.tuck_NW.JPG | alike.lovely.tuck | NW |
| K | View from stables | K_muddle.gain.scooters_65.jpg | muddle.gain.scooters | ENE 65 deg |
| L | Paddock Cottage (grade II) with Red Kite | L_guards.novels.promoting_W.JPG | guards.novels.promoting | W |
| M | West Wratting Park (grade II*) | M_leaves.printing.observers_309.JPEG | leaves.printing.observers | NW 309 deg |
| N | West Wratting Park (grade II*) | N_crashing.hunk.necklaces_N.JPG | crashing.hunk.necklaces | N |
| O | From Park Farm | O_milky.downs.consults_S.JPEG | milky.downs.consults | S 175 deg |
| P | Towards Randswood Farm | P_overdrive.dreamers.trips_SE.JPEG | overdrive.dreamers.trips | SE 136 deg |
| Q | From footpath towards church | Q_hammer.remission.sized ESE | hammer.remission.sized | ESE |
| Y | From Weston Colville Hall towards St Mary's church | Y_attend.magically.grazes_E.png | attend.magically.grazes | E |
| R | Towards Weston Colville Hall and St Mary's church | R_passively.stray.sonic_W-N.JPG | passively.stray.sonic | W-N |
| S1 | Towards Weston Colville Hall | S1_opposite.enveloped.asleep_S.JPG | opposite.enveloped.asleep | S |
| S2 | Towards Weston Colville | S2_grit.gazed.bombshell ESE | grit.gazed.bombshell | ESE |
| S3 | Capped Roman well (marked by cone) | S3_roman_well.JPG | clattered.starred.classed | 250 deg |
| W1 | From Ickneild way | W1_meanwhile.blitz.winning_183.JPEG | meanwhile.blitz.winning | S |
| W2 | From Ickneild way | W2_gravel.grass.soaps_SE.JPEG | gravel.grass.soaps | SE |
| W3 | From Ickneild way | W3_gravel.grass.soaps_NE.JPEG | gravel.grass.soaps | NE |
| W4 | From Ickneild way | W4_pronouns.flagged.explained_72.JPEG | pronouns.flagged.explained | 72 deg |

| | | | | |
|---|---|---|---|---|
| W5 | From Ickneild way | W5_itself.cigar.reflected_169.png | itself.cigar.reflected | 169 deg |
| W6 | From Ickneild way | W6_neck.hobbyists.walking_NNW.JPEG | neck.hobbyists.walking | NNW |
| W7 | From Ickneild way | W7_plastic.mothering.shade_S.jpg | plastic.mothering.shade | S |
| W8 | From Ickneild way | W8_plantings.cutaway.verge_N.JPEG | plantings.cutaway.verge | NNW |
| W9 | Looking across the Ickneild way | W9_frozen.forkful.clipboard_NNE.JPEG | frozen.forkful.clipboard | NNE |
| T | Grade II cottage facing area C | T_dorms.wages.quits_SW.png | dorms.wages.quits | SW |
| V1 | In isolated area NE Weston Green | V1_recover.grumbling.relished_NW.png | recover.grumbling.relished | NW |
| V2 | In isolated area NE Weston Green | V2_recover.grumbling.relished_S.JPEG | recover.grumbling.relished | S |
| V3 | 3 Horseshoes Pub (grade II) | V3_weds.scouted.obtain_E.JPEG | weds.scouted.obtain | E |
| X1 | South of Weston Green | X1_tabloid.officer.steam_SSW.JPEG | tabloid.officer.steam | SSW |
| X2 | South West of Weston Green towards Weston House | X2_onwards.memory.excavate_WNW.JPEG | onwards.memory.excavate | WNW |
| X3 | Towards The Grove wood in West Wratting | X3_today.collision.qualify_NW.png | today.collision.qualify | NW |

# Weston Colville Parish Council

## Response to the request for comments on the Scoping Environmental Impact Assessment (EIA) Report for Kingsway Solar

# 1 Executive Summary

- Our response is to the whole EIA Report, but we concentrate on the proposals as they affect development area C.
- We believe Parish Councils should be included as consultees so that benefit can be made of their vast local knowledge.
- The inclusion of area C seems a late, ill-considered and sloppily presented addition to the Report and has raised significant local concern about the primary role of 'willing landowners' in the site selection process as opposed to the use of wider and more appropriate criteria.
- We have grave concerns regarding area C's impact on the villages of Weston Colville and West Wratting. We are especially concerned that the report does not even show Weston Colville or Weston Green as a residential area.
- We identify numerous specific concerns regarding the Kingsway proposal which include:
    - Proximity to dwellings in area C
    - Irreversible loss of visual amenity both on village and public rights of way (PRoWs)
    - Increased flooding risk
    - Biodiversity, habitats and wildlife
    - BESS safety
    - Cultural heritage
    - Traffic and Transport issues and the unsuitability of transport infrastructure for this project
    - Agricultural land classification and the loss of valuable land for food production

Perhaps our greatest concern is the **environmental risk for Weston Colville and its inhabitants of the increased likelihood of flash flooding.**

Finally, we would like to also endorse the comments in West Wratting Parish Councils' response to this consultation which covers all three areas A, B and C.

# 2 Background: about Weston Colville

## 2.1 Character and nature of our community

Weston Colville which also includes Weston Green has been a major settlement since the eleventh century and has a population of about 450 people. This includes several who have lived in the village for a considerable proportion of their lives while others have chosen to move to the area to enjoy the countryside. By choosing to live in Weston Colville they sacrifice good transport links and the convenience of having a local shop and pub to enjoy a more peaceful country lifestyle. Many residents own dogs and enjoy regular dog walks along the footpaths so they can enjoy the rural setting. Walkers enjoy seeing the changing seasons as arable crops grow, ripen and harvest, and trees come into leaf offering refuge for wildlife. Villages take an active interest in nature, biodiversity and the environment and many are involved in local conservation projects such as the preservation of Lower Wood nature reserve and the long running Marsh Tit survey.

The village has a strong sense of community as demonstrated by the high attendances at the various social events at the Reading Room (village hall) and the concerts and dramas performed by professional entertainers in our Church which also has regular services and seasonal events such as Easter egg hunts, carol services and a Christmas Fayre. These events bring all age groups together.

**Figure 1.** Christmas party held in Reading Room

**Figure 2.** Drama performed in the church 12.12.24

## 2.2 The landscape of Weston Colville and the development area

The solar farm's development area C is a wooded clayland landscape (4D,4E) which is in good condition with strong character. The Greater Cambridge Shared Planning's landscape assessment judged it to need a management strategy to "conserve" so that the local distinctiveness and sense of place are appropriately protected, managed and enhanced.

The parish of Weston Colville contains most of the solar farm area C which includes this wooded clayland landscape.

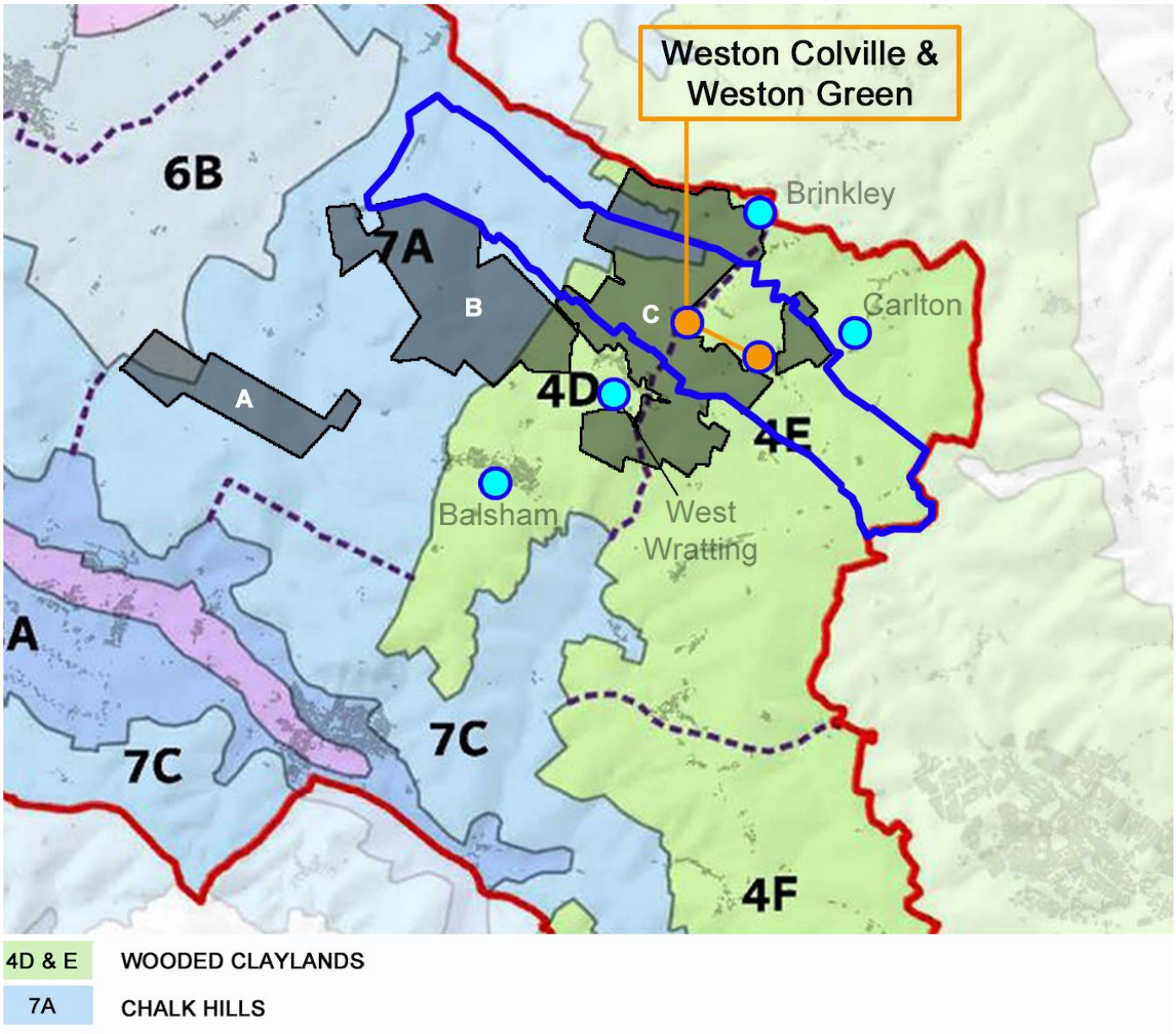



**Figure 3.** The boundary of the solar farm area C superimposed on the landscape character map from the Greater Cambridge Shared Planning Landscape Character Assessment 2021.

Weston Colville's rolling wooded claylands landscape, characterised as 4D & E, is not only comprised of ancient agricultural land (farmed since the neolithic era), but is also hilly and picturesque. Unlike much of Cambridgeshire, which is notoriously flat, the striking vistas of Weston Colville are typical of the gently undulating countryside of East Cambridgeshire as it approaches the Suffolk border. The area generally has a remote, rural and tranquil character not unlike the areas of outstanding beauty further east in Clare, Sudbury

and the Dedham Vale. Large arable fields are surrounded by extensive hedgerows, many of which are of ancient origin, reflecting the area's longstanding association with cultivation of the richly fertile heavy clay soil. Since Neolithic times, the area has been recognised as the ideal site for mixed cultivation of animals, crops and wooded areas. The route of the historic Icknield Way passes through the village linking this area of uniquely picturesque landscapes with historical and ecological sites in neighbouring LCAs.

The village's many intensively cultivated fields and carefully maintained hedgerows rely on a complex network of long-established watercourses for drainage, and these also border the woods, houses, roads and footpaths, feeding ultimately into the River Stour. Together, these features of fields, woodlands, hedges and waterways combine to create long, 'classic' expansive views of open countryside extending to distant wooded skylines. From the most elevated parts of the village, at both ends, and to either side, views extend for many miles, taking in the nearby woodland forests in Great Bradley, and all the way back to Balsham. Both the frequent and comparatively high elevation of many of the woods, fields, footpaths, roads and village houses make it very difficult to envisage how effective 'screening' of glass and metal panels up to four meters high could be achieved in such a landscape.

# 3 General difficulties and uncertainties

There are a several general difficulties and uncertainties of concern within the current draft of the Kingsway EIA scoping report.

At present, the layout of the proposed Kingsway scheme (e.g., position of solar panels, batteries, etc.) has not been finalised. The scoping report repeatedly says, "*the detailed design of the Scheme is still emerging, as are the environmental surveys and assessments required to support the planning and EIA process*". This indeterminacy, which prevents any more specific comment on the exact nature of the Kingsway proposal, exacerbated by the many inaccuracies and errors in the lengthy EIA document that is the basis for this Scoping Consultation. For example, Section 2.5.3 claims that the applicant intends to use the 'Rochdale Envelope' approach to delay finalising details of design, with some of these details possibly not being decided until after the development consent order (DCO) is made. Other parts of the scoping EIA have clearly been copied from documentation about completely unrelated NSIP proposals, such as the list of directions and distances of habitats in section 4.11.6 (which are clearly copied from the Sunnica documentation).

Indeed, the scoping EIA document has clearly not even been proofread as it retains internal references that relate to earlier drafting stages (e.g., section 5.8.1 says "*refer to Section Error! Reference source not found*"). Similar errors in chapter 2 confirm it was written before area C was added to the scheme. Although some of these errors are corrected in later more detailed chapters, others, such as the lack of recognition that Weston Colville is even a residential area, unfortunately add to the impression firmly established by the poorly handled initial Kingsway public consultation that the team in charge of this huge scheme does not appear to have even basic knowledge of the largest area it is proposing to develop.

# 4 Choice of location (alternatives considered)

Chapter 3 of the scoping EIA report discusses "*the reasonable alternatives studied by the applicant*" that must be included in the environmental statement (ES). It would appear to Weston Colville parish council that the path followed by the applicant to arrive at the area considered in their scheme was much more haphazard than they describe in sections 3.2.2 onwards; especially for area C, which, as noted above, was clearly added to the plan sometime after parts of the scoping EIA report had been written. These worrying omissions and inaccuracies are compounded by others.

For example, Section 3.2.1 states that the site selection was informed by local planning policies for the relevant county and district councils. However, any development of this scale in this landscape clearly contravenes those local policies, such as the vital protection of open countryside, which are clearly being ignored. Similarly, section 3.2.4 states that a key factor in choosing the location was land characteristics and

environmental qualities in spite of the fact that all three land areas have a "rolling rural landscape"—making it impossible to screen large areas of land from the historic linear features in this area (Fleam Dyke, Icknield Way, etc.). The presence of the headwaters of the River Stour in the Village of Weston Colville and the direct proximity of the Kingsway scheme to underlying principal chalk aquifer further call into question the suitability of the site, as does the highly residential nature of Area C in relation to the questionable safety of the BESS that would need to be located near the panels. Further questions surround the long distance to an as-yet unbuilt substation in Burwell.

Table 3-1 states that "*The search area is generally outside flood zones 2 and 3'* This was clearly written before the addition of area C which includes numerous residences, including several listed buildings, in flood zones 2 and 3. Both Weston Colville and Weston Green regularly flood, blocking roads and thus access to the village. The impact on flash flooding, which must be calculated for the next half century, in a context of rapidly accelerating climate change effects, cannot be excluded from the Kingsway proposal's EIA and ES

Table 3-1 also states that "*Consideration was given to the proximity of nearby sensitive human receptors which include residential dwellings, populated areas and villages"* providing yet another worrying example of how much of the EIA was written with no consideration at for area C – which is by far the largest and most complex area of the proposed Kingsway scheme. Although it can possibly be considered accurate for areas A and B, lack of proximity to residential dwellings cannot possibly be a criteria for choosing area C, which effectively surrounds several villages with a combined population of more than 1500 people—with more houses being built. Table 3-1 also claims that *"The Applicant also considered the location of PRoWs in the area and sought to identify a site which would reduce impact on these routes"*. This must have been written before area C (with its numerous PRoWs) was added to the scheme and is inconsistent with what is stated elsewhere in the report.

It is the considered view of the Weston Colville Parish Council that area C has been added to the scheme late and in a particularly haphazard way, on the sole grounds that the 'willing landowner' only recently volunteered to make his extensive local land-holdings available to the Applicant. In addition to more than doubling the size of the proposal, this addition also took it out of local planning and into the controversial DESNZ NSIP fast-approval track. There is currently no Land Use Framework in the UK but the most respected work to identify where solar panels should be located shows suitable land in the vicinity of areas A and B but not C.

In summary, the environmental statement needs to present a much stronger detailed justification for the inclusion of area C in the scheme than is suggested by chapter 3 of the scoping EIA report.

# 5 Major accidents and disasters—BESS safety

Section 5.6 of the EIA scoping report proposes to exclude major accidents and disasters from the scope of the EIA even though it recognises (in table 5-2) that there is a fire risk associated with the Battery Energy Storage System (BESS). The worryingly over-confident justification offered for this exclusion are that "*the mitigation in place is generally sufficient to manage vulnerabilities to major accidents and/or disasters without the need for additional mitigation in most circumstances* "(5.6.6) and that *"no significant effects in relation to major accidents and disasters are anticipated"* (5.6.6). This would appear to imply that the applicant does not sufficiently understand the serious impacts of a BESS fire, nor the considerable ongoing uncertainties involved in assessing how best to handle them if they do occur.

Although BESS fires are rare, their impact is severe and potentially life threatening, and as these battery sites become ever larger, such fire risks are exponentially higher. The overall risks to both immediate and less proximate 'sensitive receptors' -- including not only people, plants and animals, but entire ecosystems, waterways and landscapes – are of major concern as has been clearly detailed in advice from the National Fire Chiefs Council Fire Rescue service, as well as in numerous articles in the scientific literature. It is concerning to read in section 2.10.8 of the scoping EIA that "*all safety concerns around the BESS element are addressed in so far as is reasonably practicable*". From what has been learnt from BESS fires at fairly small-scale facilities

(~1 MW) experts (The Arizona Regulator 2019) have warned that a fire at a very large facility (>100 MW) would have very severe and potentially catastrophic consequences.

BESS fires release a plume of hydrogen fluoride vapour (the most highly corrosive acid) that can be dispersed over distances of kilometres, and the cooling water that must be used to prevent escalation of the fire to other battery units becomes contaminated with the acid. The large amounts of cooling water needed to combat potential BESS fires must be stored on-site, and the water from these reservoirs, if deployed, must be recovered to prevent it from affecting the soil or other nearby water bodies.

There needs to be a much more rigorous and credible examination of the risks of battery fires, as well as properly researched justification for positioning tennis court-sized lithium-ion battery banks anywhere near residential communities – several of which there are dispersed throughout area C. Detailed information about the layout and mitigation measures needs to be scoped, documented and meaningfully assessed. For a scheme intended to last half a century, the consideration of major accidents in general – including those associated with decommissioning – must be comprehensive and detailed. These details need to be central to the EIA, not relegated to an outline Battery Safety Management Plan as proposed in section 2.7.19.

In conclusion, it is essential that the risk of a major accident or disaster caused by fire in the BESS is scoped in for further assessment as part of the EIA and therefore considered in the ES.

# 6 Water

The topic of water is addressed in several places in the scoping EIA document and is yet another subject that appears to have been compromised by the late addition of area C to the scheme, the hurried preparation of the EIA, and the unacceptable lack of due diligence that is the result of these gravely worrying deficiencies.

In section 4.11.2 for example only two waterbodies are named for inclusion in a Water Framework Directive (WFD) assessment, Swaffham-Bulbeck Lode and Bottisham Lode-Quy Water. These are relevant for areas A and B but are not the major waterbodies critically relevant to the Environmental Impact on area C, which include the River Stour. The latter must also have a WFD assessment carried out for it The River Stour is already considered a major flood risk as shown on the Environmental Agency's Flood risk depth map produced on 22nd February 2022. As the EA notes in its most recent (12/24) report, flash flooding from surface water is an increasing risk –and the flood risks of large solar farms are known to be much higher in relation to exceptional, 'one off', events that cause flash flooding see ref: **https://vufind.lboro.ac.uk/PrimoRecord/cdi_proquest_journals_2906761596**. This type of flooding has been the subject of revised EA guidelines, indicating both that it is likely as many as 1 in 4 homes in the UK will be flooded by 2050, and that the most likely causes of increased flooding will be caused by surface water flooding. This combination of a rare, 'fluke', extreme rainfall event and flash flooding by surface water is exactly what caused the major flood of 2016 which essentially transformed large areas of the village of Weston Colville – half of which lies in a valley—into a lake. Flooding is already considered such a major risk for the village that the Parish Council have a resolute team who oversee regularly updates of our flood plan, the most recent copy of which is attached in Appendix 1. Pictures showing flooding are included in Appendix 5.

5.2 proposes to exclude water from the scope of the EIA. Based on the information above this is wholly inappropriate. **The River Stour should be surveyed and not scoped-out.**

# 7 Flooding

The biggest environmental risk for Weston Colville is flash flooding due to increased rainfall, likely from climate change. There were 6 incidents in 2024 where flooding led to road closure leaving residents unable to leave their properties or use their cars. During major flood events which in 2024 lasted for up to 72 hours roads, fields and gardens were submerged in up to a meter of flood water.

A primary risk of the proposed scheme is that the installation of a solar farm with numerous arrays on the fields between West Wratting and Weston Colville, and in the northwestern parcel, will lead to increased rainwater run-off from the fields exacerbating the flash flood problem with clear potential for repeats of the flood of 28th June 2016 when an extended period of torrential rain led to the worst flood the village had had for 30 years with twelve houses being flooded in both Weston Green and Church End, Weston Colville.

**This should be included in both the EIA and the Environmental Statement ES.**

# 8 Agricultural land classification (ARC)

The ARC for Area C needs to be completed rigorously, and as soon as possible in 2025. This evaluation, moreover, needs to be independently verified to ensure how suitable the land really is for solar panels or whether it is generally of a sufficient grade to warrant its retained use for farming. The Parish Council expects the latter to be the case and is concerned by the loss of this land to food production, as well as the risk that evaluations of its grading may be compromised by conflict of interest.

# 9 Landscape and visual amenity

Section 6.2 of the scoping EIA considers the effect of the scheme on landscape and visual amenity. The Parish Council believes that the scale, geographical extent and duration of the proposed development will cause widespread substantial and significant adverse landscape impacts, and prolonged adverse visual impacts. These will be felt most keenly by the residents of Weston Colville, West Wratting and the other villages that are in such close proximity to the scheme in Area C. 'Protected Open Countryside' is defined as such primarily because it is a *visual amenity*. Loss of 'open-ness' is by definition not a quality that can be 'mitigated'. Public access to protected open countryside is a cornerstone of land use policy in the UK, as is access to all of the amenities related to the rural environment, green spaces, footpaths and woodlands. All of these vital public amenities have increased in importance in the wake of the COVID 19 epidemics as a) more people have moved to rural areas, b) are working from home and c) appreciate the health and well-being benefits of being outdoors in rural locations

## 9.1 The effect on residents

Residents are not just affected by the impact on their public views and public visual amenity (i.e. the adverse effects on views and visual amenity at their place of residence, which is less important to planning as mentioned in 6.2.11). They also frequently walk in the landscape on the many PROWs and their lives are intimately related to the landscape in which they live—much more than for urban dwellers. Consequently, the imposition of large-scale industrialisation and enclosure of the rural landscape will not only compromise their enjoyment of living in the countryside but cause significant emotional distress.

This sense of grievous loss of treasured local landscape and formerly protected open countryside may not be as strongly felt by people who do not live in a rural community. A good example is in the scoping EIA which implies in section 6.2.5 (baseline conditions on visual receptor: settlements) that the changes introduced by an airport-sized solar industrial complex on their doorstep will not impact the residents because the "*inward looking nature of many of the settlements*" will limit views of the scheme. **This is clearly not true as the substantial number of houses in Weston Green and Weston Colville have windows in living rooms that look out over the fields where the solar panels will be potentially located severely impacting the view of what is currently idyllic countryside**. Section 6.2.5 further claims that "*there is theoretical potential to see elements of the scheme from the edges of these settlements*"—clearly indicating this passage was written by somebody who does not understand rural life. People do not just live in their houses or see the landscape from the edge of our settlements. They live here because they want to be actively part of the countryside. Most villagers enjoy regularly walking the many pathways around our villages and throughout the entire parish enjoying the chance to relax in the beautiful landscape in which we live. As a result, the villagers are the main "*recreational users of PRoW [that] would likely be the most sensitive visual receptors of any change in the*

*landscape associated with the Scheme"*, as recognised in section 6.2.5 (baseline conditions on visual receptor: recreational routes). The Weston Colville Community Led Plan page 11 attached in Appendix 2 shows that in response to a village questionnaire used to prepare the plan in 2015 79.6% of people surveyed thought that maintaining the rural nature of the village including its access to countryside, peace and quiet and wildlife was "very" important to them whilst a further 13.6% described it as 'quite' important -- totalling 93.2% overall who emphasised this amenity – which ranked highest overall in importance to the villagers surveyed.

## 9.2 The effect on Weston Colville and PRoWs

The description of 'Landscape context' in section 6.2.5 of the scoping EIA does not mention any of the villages near areas A, B or C; instead, it mentions villages and houses that are 12 km away and North of the A14, close to the recently approved Sunnica solar farm. This section, again, appears not to have been written for this NSIP.

In section 6.2.5 on 'Visual receptors' the settlement of Weston Colville and West Wratting are said to be as "*directly adjacent to Developable Area C*". This is a very inaccurate description as these villages are essentially surrounded by the development, as can be seen in Figure 4. The text in this section also incorrectly states that only the outer edges of West Wratting are within the ZTV, which is the zone where the solar panels and substation are theoretically visible, but figures H1 and H2 clearly show that West Wratting is entirely inside the ZTV, as are Weston Colville, Weston Green, Willingham Green and most of Carlton. In and around these villages there will consequently be more than just "*distant and filtered glimpses*" of the solar farm infrastructure. The huge scale of the development in area C means that the landscape immediately around all of the affected villages will be changed from rural beauty to an industrial power station, and we will lose the countryside environment in which we have chosen to live.

The description in section 6.2.5 of the effect of the change in landscape and visual amenity on public rights of way (PRoW) underestimates the number of these routes that will be affected, particularly in area C, simply stating there are "several PRoW within the study area". Elsewhere the report correctly states "*there are numerous PRoWs which are within, intersect or are located within 500 m of the site*", and paragraph 2.4.31 acknowledges that of the 174 PRoW inside the scheme, the largest number are in area C.

## 9.3 Scoping questions asked in section 6.2.13.

*Do you agree with the proposed consultees to be engaged with on this topic?*
The List should include Parish Councils in section 6.2.1. As they are the most relevant layer of local government to many of the key receptors being assessed within the Landscape and Visual Impact Assessment (LVIA) their advice must be included, particularly on the selection of appropriate viewpoints.

*Do you agree that the surveys proposed to inform the LVIA are appropriate?*
Section 6.2.4 says that surveys of the proposed developable areas were carried out during winter, spring and summer months. This cannot be true for area C as other evidence from the report indicates that area C was added to the project later than spring 2024.

*Are any receptors/assets/resources not identified that you would like to see included in the LVIA?*
No but, it is vital that it is understood how much more profoundly residents of rural villages will be affected by changes to their surrounding landscape and visual amenity than urban dwellers, as described above.

*Do you agree with the proposed additional (secondary and tertiary) mitigation measures and is this mitigation appropriate?*
We are very sceptical about the statement made in section 6.2.6 that "*the landscape design will seek to deliver landscape enhancements over and above the requirement to simply mitigate adverse effects*." This requires further explanation about the details of this or examples, otherwise this seems extremely unlikely to be the case. Equally we find it hard to believe that *"the scheme will be designed sensitively with consideration to complementing the local character"* (6.2.6). In addition, section 6.2.10 states that a mitigation strategy will be developed that will deliver significant "*green infrastructure connectivity*". However, in the public meeting held

with the Kingsway representative in Weston Colville it was emphatically stated that the residents of Weston Colville would not under any circumstances benefit directly from the green energy generated by the solar farm.

*Do you agree with the landscape and visual receptors that are proposed to be scoped in and out of further assessment?*
Generally, yes, but the Parish Council requests that the impact of lighting on landscape character and visual amenity remain in scope.

*Are there any specific viewpoints that you would like us to consider and/or illustrate as a photomontage?*
Parishioners have prepared a photomontage of and from heritage assets inside and on the edges of the entire scheme area which is included in Appendix 3. It is also important to use views that will show the significance and extent of changes to the settings of Grade II* listed buildings that are inside or on the boundary of area C. This includes land inside the scheme that is immediately adjacent to the churches at Weston Colville and West Wratting — this must also include the land around Weston Colville Hall and the farm buildings adjacent to it which will potentially be surrounded by Solar panels, as well as Pound Farm Barns, which are another set of listed buildings whose setting would be would be utterly transformed by the introduction of an adjacent industrial energy plant of such vast and visually prominent dimensions.

*Are there any other developments which you consider it will be necessary for us to address in a cumulative landscape and visual impact assessment?*
The most northernly parcel of land in Area C, which rises toward Carlton, is directly visible from large parts of Weston Green, and especially from 'The Avenue' on the Byway– the bridleway planted with trees by village residents and a heavily used pathway at the centre of the complex network of footpaths. These amenities, as well as Lower Wood, Whiting's Grove, the Icknield way and the Mines Farm fields are all areas of the village of particular importance in terms of visual amenity.

# Cultural Heritage

Paragraph 2.4.24 of the scoping EIA report states "*there are no listed buildings within the developable areas*". In fact, although there are no listed buildings in areas A and B, there are two important listed buildings in Weston Colville that are well inside area C of which the Church is 2* listed and dates largely from the 14th century:

1. II **Weston Colville Hall**
2. II* **The Church of St Mary**

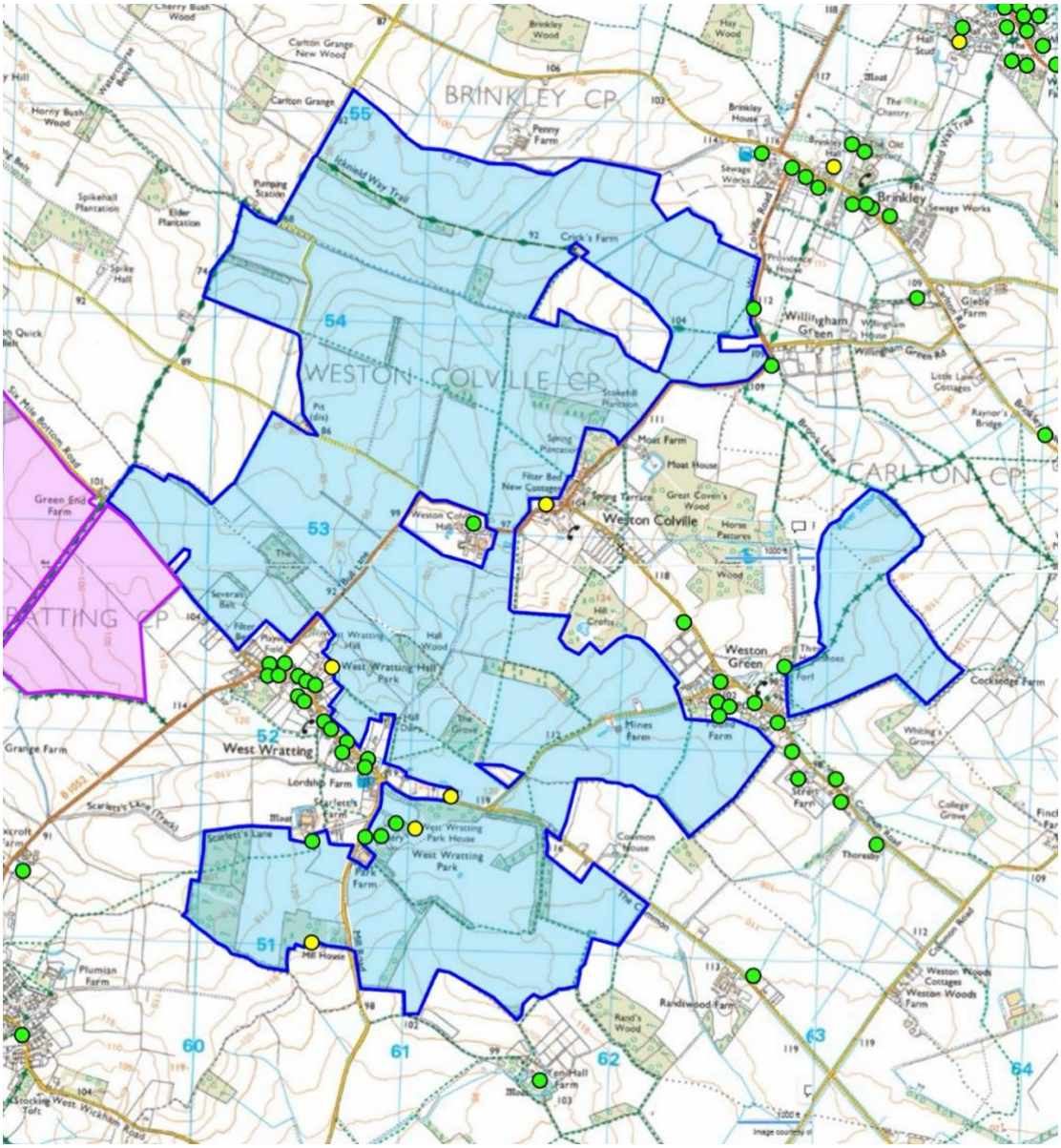



**Figure 4.** Listed buildings in and around area C (blue). Grade II buildings are shown in green and grade II* in yellow. It is comparable with figure I10 in the scoping EIA report.

There are four other listed buildings right on the boundary of development area C, including:

3 II **Pound Farmhouse, Weston Green**
4. II **Barn Pound Farm, Weston Green**
5. II **Barn Pound Farm, Weston Green**
**6.** II **Three Horseshoe Farmhouse, Weston Green**

There are also four listed properties which will have a clear view of the panels:

7. II **Lane House, Weston Colville**
8. II **Lane Cottage, Weston Colville**
9. II **Coven Wood Cottage, Weston Colville**
10. II **Pathways, Weston Green**

In addition, there are seven other listed buildings within a few hundred metres of development area C in Weston Colville and Weston Green.

The significance of the scheme (using the methodology of Appendix C in the scoping document) could be very large for some assets of high importance that are in or close to area C if their setting in the landscape is compromised by nearby and visible development see Appendix 3 , the photomontage which clearly shows the views from these listed buildings. This is particularly true of the land around Weston Colville Hall and the church.

Similarly, the settings of Pound Farm and Three Horseshoes Farmhouse—which are both right on the boundary of area C—must not be visually compromised by nearby solar farm infrastructure. The text of section 6.3 does not clearly explain the potential level of change to the setting of these assets. Section 6.8.5 says St Marys church is located approximately 20 m from Area C but figure 4 shows their churchyard is immediately adjacent to the scheme boundary.

## 9.4 Scoping questions asked in section 6.3.14.

*Do you agree with the proposed consultees to be engaged with on this topic?*
In addition to the groups and organisations outlined, other interested parties that should be consulted include Cambridge Past and Present (CPPF). CPPF focuses on protecting and enhancing Cambridge's historic and natural assets.

*Do you agree with the proposed study area?*
Generally yes

*Do you agree that the data sources listed to inform the EIA baseline characterisation are appropriate?*
These should include consultations with local historians and community groups.

*Do you agree that the surveys proposed to inform the EIA baseline characterisation are appropriate*
Generally, yes but we are especially concerned to ensure potential conflicts of interest arising from the Applicant's role in commissioning these surveys is carefully monitored

*Are any receptors/assets/resources not identified that you would like to see included in the EIA?*
The potential ruins of an old manor house in the farmland of Mines Farm which has been mentioned in all its previous planning applications and its rich archaeological heritage (see Appendix 4 Archaeological Assessment of Mines Farm 2013) mean that an archaeological assessment is required in area C, and this should be added to the lists of assets to be assessed. Key areas of biodiversity recovery include Whiting's Grove, as well as Lower Wood.

There is also strong evidence of a Roman villa in the field due north of Weston Colville Hall as shown in the photo In Appendix 3. This would also require archaeological assessment and investigation.

*Do you agree with the proposed additional (secondary and tertiary) mitigation measures and is this mitigation appropriate?*
The proposed secondary mitigation to setting (section 6.3.7) is required more precise definition rather than as it currently states "*most likely involve planting and landscaping*". This requires better clarification of what is needed and appropriate for the various different cases. Tertiary mitigation factors appear to have been excluded.

*Do you agree with the receptors/matters that are proposed to be scoped in and out of further assessment?*
Two of listed buildings, Weston Colville Hall and St Marys Church which are potentially completely surrounded by the proposed industrial scheme must be scoped-in as parts of the "within the 2 km study area" group, as must be all the listed buildings which are grade II listed on or near the boundary of area C. These will all have comparable sensitivity to the listed buildings that are fully within the site boundary so must be treated similarly. The EIA must ensure that the statement "*Construction activity [that] has the potential to directly impact on these assets …*" in column 3 of table 6.3.9 includes all activity that could physically damage the receptors, including indirect causes such as subsidence due to altered drainage, and activities related to decommissioning.

# 10 Traffic and Transport

Section 6.7 of the scoping EIA report addresses traffic and transport issues. These will definitely be considerable for the Weston Colville Parish due not only to the very narrow roads but the tight fit between the road banks, watercourses and access points. Many roads flood, have major overhanging trees and sharp turns, and suffer from severe potholes, and/or are single track (in particular the Six Mile Bottom Road towards Weston Colville).

The traffic plan outlined in chapter 2 states that "*construction access will be via the four junctions along the A11, and then onto the local road network: Six Mile Bottom Road, London Road, Balsham Road and an unnamed farm access via Worsted Lodge*" (2.7.33). These routes are shown on a hard to distinguish map, figure 2.2. on page 37. The Weston Colville Parish Council would tend to agree that the impact on roads in areas A and B may be less severe due the existing availability of good farm tracks. However, this is not true for area C, from which to access to the A11 will involve considerable use of the local roads – including by heavy transport and maintenance vehicles. Several of the existing roads are not suitable for HGV traffic, and certainly not at the suggested average volume of 80-100 HGV movements per day, excluding construction staff transportation and ancillary construction traffic (section 2.9.5). The roads between A11 and area C have little to no ability to absorb this increase in level of heavy traffic without fundamentally improving their present condition. Six Mile Bottom Road is particularly concerning.

In table 6.7.5 Six Mile Bottom Road is shown as having sufficient space for "*two streams of traffic passing each other*". This is clearly not true as it is not wide enough for even two passenger cars in multiple locations. Two HGVs would struggle to pass each other along that road at all, and even two-way continuous car traffic is often not possible because the effective road width is narrowed by deep potholes on both sides of the road. It is common especially in winter months for there to be daily occurrences of cars needing to be recovered by the RAC, AA, etc. because their wheels were damaged by potholes after being forced to drive too close to the edge of the road when passing other vehicles. Any increase in HGV traffic will further degrade the quality of that road, possibly making it unusable for cars. It will require major resurfacing along the entire 3-mile length of this road from West Wratting to Six Mile Bottom before it could be used for construction vehicles. The addition of more passing places will simply not be sufficient, and it is not at all clear the road could be widened due to the presence of multiple drainage ditches and flood areas.

Near the village of Weston Colville, Chapel Road and Mill Hill are definitely not suitable for 2-way HGV use despite the comments in 6.7.5 *Baseline conditions* based on local knowledge and actual experience see Appendix 6 Road Access through Weston Colville/ Weston Green. As above in the cases of the Six Mile Bottom Road, Chapel Road has a large number of potholes on both edges which often reduce it to a single-track road even for cars. Extensive repair and resurfacing would be required before it could even be used as a single-track road for HGVs. Mill Hill is similarly affected and requires equal amounts of road improvement works before being used by HGVs.

In response to section 6.7.13 *Scoping questions* The Parish Council has the following comments:

- The Parish Councils need to be included in the list of consultees to get the benefit of their local knowledge and experience of the Parish roads and their current use.

- We agree with the proposed study area.
- The data source used to inform the baseline seem to conflict with actual knowledge of the local roads and their lack of width for 2-way traffic.
- Surveys of all local roads in area C should be included in the surveys to inform the EIA baseline characterisation.
- The Green (road linking Mill Hill to Common road) and Horseshoe Lane in Weston Colville should be included as receptors/ assets resources in the EIA.
- There seems little mention of secondary/ tertiary mitigation measures as regards to roads.
- We are happy with the proposed traffic specific assessment approach as long as it includes all local roads in Area C and that it also includes the effect of 'rush hour' and school traffic that severely clogs the roads at the relevant tines.

# 11 Climate Change Risk

The Climate section 6.9 seems to understate the effect of increased rainfall on the flood risk for Weston Green and Weston Colville and definitely needs to be included in the EIA and ES.

This needs to be included in section 6.8.13 as *a receptor / asset / resource*.

It will also need far more mitigation than that covered by the current *secondary and tertiary mitigation measures proposed*.

It then follows from this that the current *proposed factor specific assessment approach* is insufficient as it excludes the potential flood risk.

# 12 Biodiversity, habitats and wildlife

Section 6.1 of the scoping EIA report is concerned with the impact of the scheme on biodiversity and wildlife. The survey for area C still needs to be completed and as a result is dealt with separately in the tables of matters to be scoped in and out for further assessment. The parish council has concerns regarding some of the matters that are scoped out for area C.

The incomplete level of surveying is highlighted in section 6.1.13 as a "*difficulty and uncertainty*", and 6.1.3 states that Area C "*will be subject to survey in 2025*". This subject area is both important and very reliant on field surveys and the parish council believe that the scoping EIA should not have been put forward for consideration until after the surveys were complete.

Section 6.1.9 states:

> *"Whilst the Inter Array Connection Corridors and Developable Area C - East have not been subject to ecological baseline surveys, their close proximity to Developable Areas A - West and B - Central means that they are known to contain similar habitats and be subject to similar constraints to Developable Areas A and B"*.

As mentioned elsewhere in the scoping EIA report and shown clearly in figure 4 area C has a distinctly different landscape character to areas A and B (being wooded clayland rather than chalk hills), which would imply that the ecology and habitats are likely to be different. This is clearly apparent to the residents who live here. More importantly, the relevant waterbodies for area C are very different from those of areas A and B.

Owing to these differences the parish council do not see section 6.1.9 as adequate justification for scoping out a number of receptors/matters from further assessment in area C, which includes: woodlands, rivers, streams,

ponds, hedgerows, reptiles ,ground and non-ground nesting bird (Lark ,Marsh Tits ,Yellow Hammers , Red kites, Barn owl and other raptors ) bats, hares, badgers and newts, frogs , toads and water vole (table 6.1.9 from pages 157-165). Surveys of all these matters must be carried out for area C as they have been for A and B.

There is a clear error in the argument presented in section 6.1.9 (above) to the justification that is given for scoping-out badgers from area C, which states that "*the design will seek to avoid all known setts*" (6.1.9 on page 164). The aerial survey mentioned on page 118 is unlikely to have located all badger setts in area C as they are clearly present to anyone who walks the land so the execution of a proper land-based survey as was done in areas A and B is essential to identify their locations in area C.

The parish council requests that the difficulties and uncertainties section (6.1.13) should acknowledge that most if not all research data about the effect of solar farms on biodiversity, habitat and wildlife has been generated from much smaller scale solar arrays, and there must be uncertainty associated with extrapolating the findings to a scheme of this size.

In summary, we must respond "no" to the scoping question in section 6.1.14—*Do you agree with the receptors/matters that are proposed to be scoped in and out of the EIA?* The following matters must be scoped in for further assessment by the EIA and ES by carrying out surveys in area C as they have been for areas A and B.

# 13 Population and Health

Section 5.8.4 proposes that because human health impacts will be captured by other assessments "*human health is not subject to a stand-alone assessment and therefore a separate ES chapter is excluded from the scope of the EIA*". Although the parish council agrees that a stand-alone assessment is not required it would be better for the relevant material from other assessments to be collected into a separate ES chapter, particularly for the topics bulleted in section 5.8.1.

In the section 'The effect on residents' section of 'Landscape and visual amenity' it should be made clear that there will be a detrimental impact to the mental health and wellbeing of residents of rural villages in close proximity to the scheme—especially those next to area C. This impact on the population seems not to be addressed anywhere in the scoping EIA document. The parish council think it should be part of health considerations in the EIA.

A specific area of concern is the proposed construction schedule of 07:00 to 19:00 Monday to Friday, and 07:00 to 13:00 on Saturday, with construction staff travelling to the site pre-07:00 and departing after 19:00 (for weekdays). The parish council see this to be unacceptable. To prevent detrimental harm to residential amenity for the majority of residents we recommended that construction hours should be limited to between 08:00 and 18:00 Monday-Friday, 08:00 and 13:00 on Saturday, and at no time on Sundays, Public Holidays or Bank Holidays. This is in addition to our far greater concern of the continuous impact of the built site for its entre lifetime.

Section 6.8.9 proposes that private properties and housing to be scoped out of further assessment with the justification that "*No significant effects are expected in relation to private property and housing*". The parish council very strongly contests this claim, based on an analysis of the effect of another solar farm on house prices and on the experience of people who are currently trying to move, sales seem to appear to have stalled because of buyers concerns about the proposed solar farm development. This definite socio-economic effect should be in scope for the EIA with an explanation by the applicant of how they propose to mitigate this impact of their scheme.

# Appendix 1 Weston Colville Parish Council Flood Plan January 2025

https://westoncolville.org.uk/wp-content/uploads/2025/01/Weston-Colville-CLPPv3.pdf

# Appendix 2: Weston Colville Community Led Parish Plan

https://westoncolville.org.uk/wp-content/uploads/2025/01/Floodplanappendix3.docx

# Appendix 3: Images of listed Buildings in Weston Colville / Weston Green and their settings

Pound Farm, Chapel Road, Weston Green

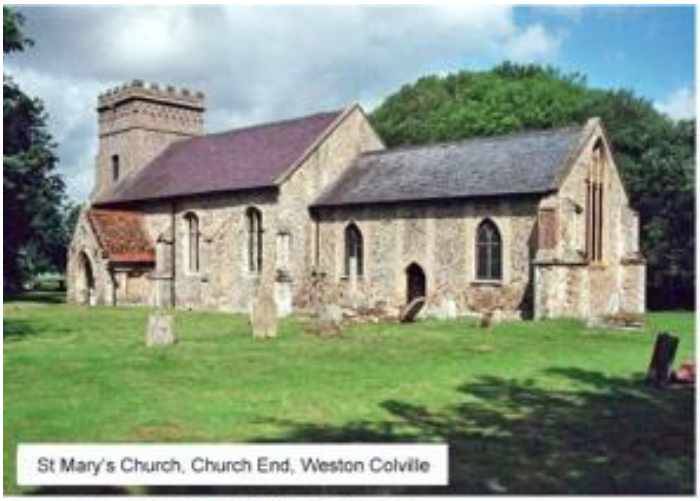
Pound Farm Barns, Chapel Road, Weston Green

Views from Pound Farm & Barns across affected fields around Mine's Farm ///rewriting.roadways.toads S

Views from Pound Farm & Barns across affected fields around Mine's Farm ///shade.exposing.customers S

Views from Pound Farm & Barns across affected fields (winter) around Mine's Farm from footpath ///daffodils.scar.november SE

Views from Pound Farm & Barns across affected fields (summer) around Mine's Farm from footpath ///daffodils.scar.november SW



St Mary's Church, Church End, Weston Colville

St Mary's Church with affected fields behind
///horseshoe.lifters.padlock NW

View from St Mary's Church across affected fields to
Weston Colville Hall ///hazel.boldest.general SW

View from footpath across affected fields to
St Mary's Church ///hammer.remission.sized ESE

View from footpath across affected fields to
St Mary's Church ///kickers.swoop.tube NNW

Weston Colville Hall, Church End, Weston Colville

View from Weston Colville Hall across affected fields and Roman Villa site
///drops.feasted.weep N
Roman Villa Site

View from Weston Colville Hall across affected fields to village ///drops.feasted.weep E

Weston Colville Hall
View from St Mary's Church across affected fields to Weston Colville Hall ///impeached.nerves.ticking SW

St Mary's Church
View from Weston Colville Hall across affected fields to church ///sailor.wreck.toned N to E

Weston Colville Hall
Roman Villa Site
View of Weston Colville Hall and Roman Villa site ///really.hems.showcases W to N

# Appendix 4: Archaeological Assessment of Mines Farm 2013

**https://westoncolville.org.uk/wp-content/uploads/2025/01/Archaeology-Assessment-of-Mines-Farm-Weston-Colville-2013.pdf**

# Appendix 5: Flash Flooding on roads in Weston Colville/ Weston Green, Summer 2016 and Summer 2024

Flash Flooding on roads in Weston Colville/Weston Green, Summer 2016 & Summer 2024

# Appendix 6: Road Access to Weston Colville/ Weston Green

**Road access through Weston Colville/Weston Green, to affected fields**

**Withersfield Parish Council:**

**Comments on the proposed EIA Scoping Application for Kingsway Solar Farm - EN010165**

**Withersfield Parish is the most south and west parish in Suffolk and borders the areas where the proposal would be located.**

**The Parish Council believes that a development of the size and scale of this proposal has the potential to have significant impact on our parish and the lives and well-being of our residents.**

**We fully support the move to green renewable energy and appreciate the positive contribution that solar farms can and are having in making the switch from damaging fossil fuel generation.**

**That said, the Parish Council believes that this should be seen as a green light to all and every development, no matter what size and impact on local communities. We believe that the principles of community engagement and full and meaningful consultation should not be sacrificed.**

**We have set out below a number of questions which we believe should be answered by the applicant prior to any decision being made to permit this development.**

**We are grateful to the Planning Inspectorate for identifying the Parish Council as a formal consultee. However, we wonder why the neighbouring planning authorities – West Suffolk District Council and Suffolk County Council have not been included in your list of consultees. This development would have implications for both the Local Plan and the County Council's strategic infrastructure plans.**

## 1. Environmental Impact and Biodiversity

**We have concerns regarding the impact on local ecosystems, biodiversity, and agricultural land. The project could disrupt wildlife habitats, including protected species like hares and skylarks, and compromise movement of larger mammals due to security fencing. A comprehensive ecological assessment, along with long-term monitoring and habitat management plans, is essential to mitigate these risks and protect local wildlife corridors.**

**Key Questions**:

1. Has a comprehensive Environmental Impact Assessment (EIA) been conducted?
2. What measures will be required to be put in place to protect local wildlife?
3. How will biodiversity be monitored and managed over time?
4. Will wildlife corridors be established?
5. How will construction-phase impacts on biodiversity be minimised?

## 2. Proximity to Residential Areas

**We worry that the location of battery storage systems could have a negative impact on residential properties and of the rural environment more generally. We are concerned that there could be significant landscape alterations, noise pollution from BESS, construction disruptions, and potential impacts on property values, which may affect residents' well-being and the appeal of surrounding areas.**

**Key Questions**:

1. What is the minimum distance to the nearest residence?
2. Has a noise impact assessment been conducted?
3. Will there be anti-glare measures for solar panels?
4. How will construction noise be managed?
5. Will visual screening be implemented around residential areas?

### 3. Agricultural and Land Use Concerns

**We are concerned at the loss of productive agricultural land with a consequential impact on our rural economies, rural employment as well as the potential impact on food security. We understand solar farms can degrade the land, making it less suitable for future agricultural use.**

**Key Questions**:

1. Was the land's agricultural value considered in site selection?
2. How will soil health be monitored during the project?
3. Will land restoration be ensured post-decommissioning?
4. Will there be a commitment to preserve agricultural land post-use?

### 4. Community Consultation and Engagement

**Effective community consultation is crucial for large-scale solar farms. We believe this should not be superficial and conducted only to fulfil legal requirements. We feel that fostering positive relationships with the community can ensure that negative impacts are mitigated and positive benefits for the community and the environment can result.**

**Key Questions**:

1. How will community feedback be incorporated?
2. Is the consultation process designed to be more than a formality?
3. Will there be additional rounds of consultation throughout the project?
4. How will residents and neighbouring communities such as Withersfield be kept informed?

### 5. Flood Risk and Water Management

**We fear large-scale solar farms could negatively impact on drainage patterns and increase flood risk due to increased surface runoff. Given existing flooding issues within the vicinity,**

**including in local rivers and water courses in Withersfield, it is essential that effective measures are in place to safeguard water resources and prevent further environmental impact.**

**Key Questions**:

1. How will water runoff be managed?
2. What flood risk assessments have been conducted?
3. Has the impact on local rivers and water courses been assessed?
4. What provisions are in place for water management?

### 6. Long-Term Viability and Maintenance

**We would expect solar farms to require ongoing maintenance and management, leading to increased traffic in the area. This can impact local roads, particularly narrow and single-track lanes. Adequate road infrastructure is essential to support both construction and operational activities, including access for emergency services.**

**Key Questions**:

1. Will a traffic management plan be required for both the construction period and to cover the long-term management and maintenance of the site?
2. What is the operational lifespan of the solar farm?
3. How will site access and traffic be managed?
4. Are financial provisions for site restoration in place?
5. Are legal protections for site restoration in place?

### 7. Economic and Regional Impact

**Large-scale solar projects can offer economic benefits but also present challenges for local communities. The future use of the land after decommissioning remains uncertain, raising concerns about its long-term impact on the local economy and community character.**

**Key Questions**:

1. What job opportunities will be created locally?
2. How will potential agricultural job losses be mitigated?
3. Are there measures to protect property values?
4. Will there be community investment options?
5. What reinvestments are planned for the local economy?

### 8. Loss of Amenity

**We are concerned about the impact on local footpaths and the visual character of the landscape. Footpaths, protected by law, are essential for recreation and well-being.**

**Key Questions**:

1. How will public footpaths be impacted?
2. Will all paths remain legally accessible?
3. Are there plans to enhance recreational spaces?
4. Is there scope to improve and/or extend public footpaths and cycleways?
5. How will visual impacts along footpaths be minimised?
6. Will green infrastructure be developed to support public access?

### 9. Disruption During Construction

**The construction of the solar farm will involve significant traffic and noise disruption for local and neighbouring communities. Heavy construction vehicles will increase traffic on local roads, potentially causing congestion and road damage. Construction noise and light pollution may also impact residents' quality of life. Additionally, the construction phase could disrupt wildlife habitats, affecting sensitive species.**

**Key Questions**:

1. What is the expected construction duration?
2. How will noise and light pollution be managed?
3. Will any local roads be temporarily closed?
4. Are there measures to manage construction traffic?
5. How will road damage from heavy vehicles be addressed?

### 10. Battery Storage and Technical Infrastructure

**The project includes significant hard infrastructure in the form of the battery storage systems (BESS). We fear that these systems could bring additional risks to the environment and to local amenity.**

**Key Questions**:

1. Where will BESS containers be located?
2. How will fire risks be managed?
3. Have local fire services been consulted?
4. What noise mitigation measures are planned?
5. Will lighting for BESS installations be minimised?

### 11. Benefits to Community

**The Kingsway solar farm project will have long-term impacts on the local community. We believe that if the development proceeds there should be tangible benefits for local and neighbouring communities and are interested in proposals for community benefit fund linked to project income. This could ensure that future generations benefit. Additionally, the project could include measures to mitigate flooding risks, improve local infrastructure, and enhance public access to the surrounding landscape.**

**Key Questions**:

1. Will a community fund be established for local improvements?
2. Will discounted energy benefits be offered to residents?
3. Are infrastructure improvements planned for flood mitigation?
4. Could funds be used to tackle long standing local infrastructure issues - for example east-west transport links between West Suffolk (Haverhill and beyond) and Cambridge?

**Withersfield Parish Council**
**14 January 2025**