

To: Kingsway Solar Ltd/Downing Renewable Developments (“Downing”)

Response from Brinkley Parish Council (“Brinkley”)
to the non-statutory pre-application in respect of the Kingsway Solar proposal

1. General

Brinkley objects to the Kingsway proposal in the form as shown on Downing’s website. Brinkley does not object to the principle of good solar development in the countryside; we acknowledge the need for the UK to swiftly transition towards net zero and wish to play our part in facilitating that.

Our principal reasons are as follows:

- Site selection and particularly Parcel C
- Lack of clarity as to what land will be used for panels and the location of the battery storage
- Lack of clarity as to how the harmful effects on the landscape, biodiversity and heritage assets will be minimised
- The absence of details as to how/where the supply to the grid connection point will be located
- Uncertainty around the delivery of benefits to offset the harm to nearby communities

Further consultation prior to the statutory consultation could help to minimise our concerns. We acknowledge the effort of David Vernon to meet with the Parish Council on 4th December.

In an effort to work with Downing, we have set out our concerns in more detail below.

2. Site Selection

It seems that Downing have started by identifying the opportunity for a grid connection at Burwell, secured that connection (listed as 480MW on the most recent “tec” register with an effective date of 31/10/2032) and then sought to secure the land on which to place panels. They have then tied up Rat Hall Farm (parcel A) and talked to other landowners nearby. Three landowners have turned them away to our knowledge and there may be more. They have then looked eastwards to Wadlow Farm (Parcel B) albeit this may not have received consent from the wind farm operator to collocate panels with solar panels and then further east to the West Wrattling Estate (Parcel C).

This is a completely perverse way of selecting sites. WE would expect them to have been through a robust process to establish the possible locations where the least harm would be caused.

It appears that they have not considered land north of the A11. This is within the Green Belt of Cambridge, but we consider that the harm caused to the Green Belt is considerably less than the damage that could be caused to the landscape, heritage assets and biodiversity by siting any panels on Parcel C.

There are precedents for siting solar farms within Green Belt – see the Hanningfield example which was granted on Appeal¹ as was Crays Hall² for example. In all cases the harm caused to the Green Belt was outweighed by the benefits offered. It should be remembered that the key purposes of the Green Belts are:

- To check the unrestricted sprawl of large built-up areas
- To prevent neighbouring towns from merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns

We do not consider that the siting of solar panels north of the A11 would contradict these purposes.

We refer below to landscape and agricultural differences.

There is currently no Land Use Framework in the UK but the most respected work to identify where solar may be located is the study by Exeter University's Environmental Intelligence Centre³, which shows suitable land in the vicinity around Parcels A and B but not Parcel C. Given that this study identifies more land than is required to meet our needs from solar, it would be perverse to site panels in Parcel C and further consideration should be given to other sites.

If this is a genuine consultation, then the site selection should be revisited.

3. Land Quality

Government policy remains that solar farms should avoid the best and most versatile land (BMV) defined as Grades 1, 2 and 3A.

All of Parcel C is within Grade 2 per the provisional Agricultural Land Classification as shown coloured blue below. Whilst it would be for Downing to have a proper assessment of the soil quality where they may wish to site panels, it is unlikely that any of Parcel C would be assessed as worse than Grade 3A and is most likely to be Grade 2.

¹ <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?Caseid=3300222&CoID=0>

² <https://www.boom-power.co.uk/boom-power-win-appeal-for-solar-scheme-in-essex/>

³ <https://mapst.ac/foe/onshore-renewables-england#12.13/52.13775/0.30297>

Without the withdrawal of Parcel C from the areas for panels, we would maintain our objection on the grounds that there has not been sufficient effort to prove why the loss of BMV is justified.



4. Landscape Quality and Visual Amenity

In the Landscape Character Assessment carried out for the Greater Cambridge Partnership in 2021⁴, the areas where Parcels A and B are located fall within the National Character Area 87 East Anglian Chalk “*covering much of the south and east of Greater Cambridge, this is simple and uninterrupted landscape of smooth, rolling chalkland hills and large regular fields enclosed by low hawthorn hedges, with few trees and expansive views to the north*”.

This is true of those parcels. The land north of the A11 is similar but at this point the hills have mellowed, and it is a softer landscape more capable of accommodating solar panels without a high visual impact, particularly with screening, and thus cause minimal harm to the character of the landscape.

Parcel A comprises featureless land which has not been managed for the environment with no evidence of the landlord or tenant having put anything back to boost the environment or biodiversity. The hedges are poorly maintained and offer little to wildlife or biodiversity. It is unfortunate that such management has been the reason why this parcel could be suitable.

Parcel B also has few natural features with no evidence of efforts to improve the natural capital. There are some post war woodland plantings which date back to a previous owner. There is already a wind farm with thirteen turbines each of 2MW. Were it not for the wind turbines then part of this Parcel would also be suitable. The combination would

⁴ https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-08/LandscapeCharacterAssessment_GCLP_210831_Part_A.pdf

result in an industrialised landscape and this would set the bar considerably higher to demonstrate that the landscape harm could be reduced.

Parcel C is a different landscape character altogether. Within the same study, it forms part of Area 86 South Suffolk and North Essex Clayland “*covering the south-east of Greater Cambridge, this is an ancient landscape of wooded, arable countryside with a distinct sense of enclosure, set within a gently undulating plateau with small scale river valleys*”.

The Assessment goes on to categorise Parcels A and B as within *Chalk Hills and Scarps* where historically there have been no villages and few houses other than those at the few farmsteads that exist.

Parcel C is within *Wooded Village Farmlands* and the villages affected are Brinkley, Weston Colville, West Wrating and Balsham. These villages are ancient settlements with unique characters that sit sheltered but prominently within their landscape and they lie in a line that marks a difference in soil types from chalk to clay. They are linked by a highway that has some of the best views in Cambridgeshire looking out over uninterrupted countryside to Cambridge to the north-east and Ely Cathedral to the north. The character strengths of all the Parcels are described as *strong* where the objectives should be to *Conserve where emphasis should be on conservation of existing character and....Great care will need to be taken in the introduction of new characteristics.*

Clearly the incorporation of solar panels into this landscape would be totally at odds with the findings of this very recent study and we cannot see how the harm can be justified where there has been insufficient attention paid to site selection. Parcel C is the area where the character would be most affected.

Should part of Parcel C be used for mitigating the effects of Parcels A and B, it is important that the Biodiversity Net Gain is in excess of the statutory minimum given the currently denuded nature of Parcels A and B.

5. Heritage Assets and Environmental Designations

The settlements of Brinkley Weston Colville and West Wrating have a number of listed buildings and important historical features including a Scheduled Monument at Weston Colville. These would be adversely affected and there are strong policy grounds for panels not being within proximity or site. This particularly applies to Parcel C.

Unsurprisingly, given the Landscape Assessment referred to earlier, there are a large number of Ancient and Semi-natural woodlands within Parcel C.

6. Design

The consultation is lacking any detail of design and in particular where the panels would be sited. We note however that the normal design criteria requires 2.5 acres (1 hectare per) MW of installed capacity where the land is level and remote from habitation or where natural features need to be buffered. It thus looks as though the “yield” of panels relative to area would be good in Parcels A and B and the loss of agricultural land can be minimalised. The opposite is the case for Parcel C where extensive buffering would be required (houses, listed buildings, natural features, semi natural woodland, rights of way, etc.) and the topography is less suitable. The yield would thus be lower causing a greater loss of agricultural land per MW of installed capacity. This is abhorrent given that there may be other sites available not in the current proposal.

7. Public Access

There are a number of historical rights of way which are well used and which would be adversely affected. These are enjoyed by local users as well as being a destination for enthusiasts (Ramblers, etc). and visitors to the area. Any proposals for panels should be accompanied by studies of access use. Locals will testify to the number of people specifically coming to enjoy walking, cycling and riding because of the peaceful rural nature and the views that can be enjoyed.

These particular features apply mostly to Parcel C. It also includes the historic Icknield Way which runs from Wiltshire to Norfolk along the chalk spine of England⁵.

Siting panels close by would be a travesty given its historical significance.

There are numerous examples of important views that would be adversely affected in Parcel C.

Despite being told that the reason for including Parcel C was to provide mitigation, there has clearly been an intention to site panels on the fields at the eastern most point as there is an adjacent linkage with a cable connection search shown on the website. The Byway Open to All Traffic (BOAT) that runs through this area is a particularly important facility for Brinkley parishioners and it is both important for the views in and out.

8. Cable Routes

We note the absence of any detail and were surprised to be told that these would only be disclosed at the second statutory consultation. Furthermore, the statement that compulsory powers would be used, almost as a matter of course, was not reassuring. We would expect cables to be underground and not to see a secondary high voltage line

⁵ <https://icknieldwaypath.co.uk>

beside the existing huge pylons. We note that part of the corridors runs through the Green Belt and in this case, pylons would conflict with the purposes stated above.

9. Community Benefit

There is an absence of any information regarding this but a vague assurance that the directors of Downing would decide what was appropriate. We would expect a binding commitment to an annual sum akin to wind farms. We note that at the Wadlow Wind Farm the agreed amount is £39,000 per annum in respect of the 26MW installed capacity or £1,500 per MW. We would expect a similar amount per MW.

There will be various issues to which this can be applied in each village but the over-riding matters which matter to residents are highways maintenance (likely to be exacerbated by construction), further rights of way and space to enjoy nature in peaceful surroundings, education (formal and informal) and being able to access public facilities like healthcare.

Rural areas like ours already feel neglected by local and national governments and if we are to host renewable energy for the benefit of the urban populations it is only fair that we can see marked improvements in all these matters.

Any community funds should be administered in a way which is not restrictive as is found with the Wadlow Fund leading to unused funds being diverted elsewhere. Possible uses should assist with lower energy bills, assistance with installing solar panels, car charging points and the like so that residents can feel part of the move to decarbonisation we all aspire to.

10. Conclusion

Whilst we can be extremely critical of the way in which a heavy-handed approach has been taken, we strongly object to any panels being included on most of Parcel C, we are willing to meet further with Downing to help prior to any Stage two consultation.

Brinkley Parish Council
12th December 2024