

WEST WRATTING PARISH COUNCIL

Clerk to West Wrating Parish Council

10th / December / 2024

West Wrating Parish Council's consultation feedback to Kingsway Solar Ltd

Downing Renewable Developments (DRD) have opened a stage one (pre-application, non-statutory) consultation period from 31 October to 12 December in which they want to hear our views on the potential development as they start to develop their plans and an initial design. This is the best opportunity for West Wrating Parish Council (WWPC) to influence the design of the solar farm so that if it does go ahead its impact on West Wrating will be minimised.

The government's guidance [Nationally Significant Infrastructure Projects: Advice for Local Authorities](#) says

The local authority should engage with the applicant even if they disagree with the project in principle. Early engagement with the applicant will not undermine any objections or submissions they may make during the next stages of the NSIP process.

1. Overall Position

West Wrating Parish Council objects to the solar farm and battery storage proposal as presented by Downing Renewable Developments in October 2024 because of its considerable adverse impacts on the landscape, visual amenity, and heritage of West Wrating and potential of harm from long term hazards.

There is no justification for a solar farm of this scale being placed in such close proximity to a rural village community; this is particularly true of area C in the plan, which is totally unacceptable.

High grade agricultural land should not be considered for conversion to a large-scale energy project until a national policy for land-use is in place.

2. Design Input

The following suggestions from West Wrating Parish Council (WWPC) for improvements to the design are not prejudicial to our overall position on the proposed solar farm, as outlined above.

The order of these suggestions is not indicative of their priority.

2.1 Preservation of landscape and visual amenity

Living in West Wrating must still feel like being in the countryside, not a power station. The following requirements aim to preserve West Wrating's rural character and our quality of life.

- **2.1.1** There must be buffer zones of several hundred meters between all habitation and village amenities, including the Church, and the infrastructure of the solar farm. This includes solar panels, buildings, power cables, and fencing. Where necessary land contours,

WEST WRATTING PARISH COUNCIL

10th / December / 2024

landscaping and natural vegetation must be used as a natural screen. The result must be that none of the infrastructure is obviously visible from the central village envelope.

Wide natural vegetation buffer regions surrounding the solar farm infrastructure will also provide habitat connectivity and nesting areas for wildlife, promoting species resilience.

- **2.1.2** Security fencing and the solar farm infrastructure - including cables - must be set back from and not visible from any footpaths in the network that surrounds the village and cross the solar farm. The security fencing must all be screened by natural contours, landscaping, hedgerows or trees so that being on the footpaths still feels like a rural setting. Again, the natural vegetation buffer regions will also provide habitat for wildlife. This is particularly true for the ancient Ickneild way that runs from Balsham, through West Wratting, and to Weston Colville, but should hold for all the footpaths that are marked on Cambridge County Council's definitive database of footpaths¹, a summary of which is shown in appendix A. **Literally all these paths are used regularly** by many residents of West Wratting and visitors; they do not need to be individually identified.
- **2.1.3** Cables within the solar farm should run underground rather than be on telegraph-like posts so they too are not visible from the central village envelope or footpaths.
- **2.1.4** To compensate for loss of genuine rural landscape the network of footpaths should be extended with additional permissive paths, cycle tracks and bridleways through the solar farm.
- **2.1.5** Mitigation must be put in place to prevent any worsening, and preferably improve, the flooding that occurs regularly in the fields around West Wratting. Examples of areas prone to flooding include: TL 615510, TL620512, TL618518 and wide surrounding area, TL628521 and surrounding area, TL589523.
- **2.1.6** The underlying chalk aquifer in this area is particularly vulnerable to any potentially polluting activity at the surface². DRD must commission - in collaboration with Cambridge Water and Anglian Water - an independent analysis of how Kingsway solar farm may affect both the water supply, and the rare chalk streams and wider ecosystems that they support. Any recommended mitigation measures must be carried out.

2.2 Preservation of heritage and village character

- **2.2.1** Local businesses must not be impacted by development of the solar farm. For example, the equestrian stables at grid reference TL 60912 52090 must be able to continue to operate with no loss of the fields (TL 60797 52232) that are currently used by their horses.
- **2.2.2** It is extremely important that the woodland cemetery that's just outside the published envelope of the development (grid reference TL 60660 55177) is completely unaffected by the solar farm, both visually and in terms of noise. There must be no change to the experience of being there.

¹<https://www.cambridgeshire.gov.uk/residents/libraries-leisure-culture/countryside-access/definitive-map-and-statement>

² DEFRA, *Cam and Ely Ouse Chalk Operational Catchment*,
<https://environment.data.gov.uk/catchment-planning/OperationalCatchment/1026>

WEST WRATTING PARISH COUNCIL

10th / December / 2024

- **2.2.3** Solar farm infrastructure must not be visible from St Andrews Church grounds and graveyard TL606523.
- **2.2.4** West Wrattling does not have any streetlights. This is a deliberate policy that allows our residents to experience rare low-levels of light pollution. The solar farm must not have any “always-on” night time security lighting. The security system must use non-visible wavelength (infra-red) lighting and cameras.

2.3 Preservation of wildlife and habitat

- **2.3.1** There must be a new comprehensive *independent* ecological assessment of the effect of the solar farm *of this scale and design* on the wildlife and biodiversity around West Wrattling. This must be completed as soon as possible - before the examination stage of the NSIP - and made simultaneously available to DRD and the public. If DRD are confident in their claims that Kingsway solar farm will benefit biodiversity and will not adversely affect wildlife then they will not object to the ecological assessment being carried out by an independent expert commissioned by the local authority.
- **2.3.2.a** During construction of the solar farm and continuously thereafter the ecology of the solar farm must be monitored by independent experts appointed by the local authority to confirm that all commitments in the development consent order (DCO) are complied with. Monitoring must happen throughout the year during the life of the solar farm, to ensure that the full seasonal change is covered, and the costs of this monitoring will be borne by DRD, as specified by legislation³.
- **2.3.2.b** Any long-term deleterious impact on wildlife populations and habitat that are identified by the monitoring must be dealt with by DRD, if necessary by removing or redesigning parts of the solar farm.
- **2.3.3** Construction of the solar farm must be done in a way and at a pace that minimises disruption to wildlife. For example, construction activities must be scheduled outside of sensitive breeding or nesting seasons to avoid disrupting critical life stages for wildlife species.
- **2.3.4** Hedges, trees and other habitats for wildlife (ditches, scrub, ponds, streams) must be minimally disturbed prior to and during construction. They must not be removed. Replacing them elsewhere is not satisfactory. This is particularly true for the many significant old hedgerows that would be protected under usual planning applications.
- **2.3.5** Security fencing must have a gap (15-20 cm) between the base of the fences and the ground to allow small wildlife to pass through.
- **2.3.6** Security fencing in the solar farm must be fitted with tunnels so that the movement of badgers (e.g., at TL598528) is not impeded.
- **2.3.7** Security fencing in the solar farm must be fitted with wildlife access gates to preserve the movement of wildlife around the solar farm boundaries. Some method must also be sought to enable the movement of larger mammals, particularly deer.

³ Private communication from Pippa Heylings, MP.

WEST WRATTING PARISH COUNCIL

10th / December / 2024

- **2.3.8** Artificial structures such as nest boxes, hibernacula and log piles should be installed in suitable areas under the guidance of the monitoring ecologist.
- **2.3.9** The solar panels should be situated away from sensitive aquatic invertebrate populations. Although there is some debate about the accuracy of the research on which this recommendation is based⁴, in the absence of counter-evidence the design must err on the side of caution.
- **2.3.10** The solar farm must use panels that are designed to have low and preferably non-polarized reflections (e.g., using low-reflectance cells, optical coatings, structured surfaces), not only for higher efficiency but also to reduce the effect on aquatic invertebrate and the risk of collisions by flying wildlife.
- **2.3.11** The solar farm must be designed to maintain movement corridors and connectivity pathways that allow for the movement of species between fragmented habitats.
- **2.3.12** Setback distances and exclusion zones must be implemented to protect sensitive habitats and breeding sites of priority species, of which there are several in this area (e.g., skylark, yellowhammer, linnet).

2.4 Health and Safety

- **2.4.1** The inclusion of battery energy storage systems (BESS) in the Kingsway development is questionable given the National Grid and others are already developing large scale facilities for matching supply to demand. Due to this and our valid concerns about the safety of lithium batteries. BESS must be excluded from the Kingsway solar farm proposal.
- **2.4.2** If BESS are included in Kingsway solar farm they must be sited at least 2 km from any habitation⁵. It is not safe to live near lithium battery units because of the high risk from them catching fire (low likelihood, very high impact) causing the release of dangerous chemicals into the air.
- **2.4.3** All BESS must be designed with considerable mitigation measures to prevent - in the event of a fire - run off of contaminated water into the chalk aquifer. The chalk aquifer is vulnerable to pollution and contamination would seriously affect the entire Cambridge area⁶.

⁴ Horváth et al (2010). [Reducing the maladaptive attractiveness of solar panels to polarotactic insects](#). Conservation Biology, 24: 1644–1653.

⁵ Gridscale Batteries and Fire Risk

<https://www.netzerowatch.com/all-papers/gridscale-batteries-fire-risk>;

Safety of Grid Scale Lithium-ion Battery Energy Storage Systems.

[DOI:10.13140/RG.2.2.11566.79687](https://doi.org/10.13140/RG.2.2.11566.79687);

Hazardous Substances potentially generated in "loss of control" accidents in Li-ion Battery Energy Storage Systems (BESS) : storage capacities implying Hazardous Substances Consent obligations.

[DOI:10.13140/RG.2.2.35893.76005](https://doi.org/10.13140/RG.2.2.35893.76005);

Application of the COMAH and Hazardous Substances Consents Regulations to Battery Energy Storage Systems (BESS): Does classification as "articles" exempt a technology?

[DOI:10.13140/RG.2.2.22471.98724](https://doi.org/10.13140/RG.2.2.22471.98724).

⁶ *Addressing water scarcity in Greater Cambridge: update on government measures,*

<https://www.gov.uk/government/publications/addressing-water-scarcity-in-greater-cambridge-update-on-government-measures/>

WEST WRATTING PARISH COUNCIL

10th / December / 2024

- **2.4.4** We strongly oppose the use of West Wrattling roads for any construction traffic. At the earliest opportunity a traffic management plan must be agreed with the local authority and the affected parish councils. This must detail proposed access routes for construction vehicles, and the expected volume of construction traffic. It must address ways to mitigate against the impact of daily commuting by many construction workers, and the impact of a large number of heavy vehicle movements each day (estimated at >500). The agreed traffic plan must then be included in the DCO.
 - **2.4.5** Construction traffic must not be allowed to use the roads around West Wrattling during the morning and evening rush hours (times to be agreed in the traffic management plan), and when the schools are starting and ending.
 - **2.4.6** Before any construction begins on Kingsway solar farm, all roads to be used by DRD related traffic must be repaired at the expense of DRD.
 - **2.4.7** The quality of the roads then needs to be monitored continuously by DRD throughout construction and any damage repaired immediately.
 - **2.4.8** If higher than usual levels of solar farm related traffic persist after construction of the solar farm, then ongoing monitoring of the road quality and their rapid repair must continue.
 - **2.4.9** Safe footpaths must be built at DRD's expense to remove the risk of road traffic accidents on roads within the village envelope that are likely to be used by construction vehicles. In particular, the road into West Wrattling from Six Mile Bottom does not have a continuous footpath, causing residents - including school children - to have to walk along a stretch of road (at grid reference TL 60119 52453) that has poor visibility and no easy escape route. This must be included in the traffic management plan.
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3 Compensation

This section asks for methods of compensation to the residents of West Wrattling for the considerable adverse impact of the solar farm on their quality of life and the value of their property⁷. We expect similar compensation will be requested for the residents of other affected parishes.

- **3.1** WWPC does not accept the statement made at the private meeting with Kingsway Solar Farm (at the meeting with them on 19th November) that it will be impossible to compensate the individual households of West Wrattling by reducing the cost of their electricity. Discussions are currently taking place between the solar industry and UK Government to enable this type of compensation, which is supported by Octopus Energy⁸. If Kingsway Solar Farm is approved by the secretary of state, a mechanism to deliver reduced electricity prices **must** have been put in place so that individual households in West Wrattling immediately start to receive compensation.

⁷ See the detailed analysis at <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/General/General-Advice-00769-2-Attachment.pdf>

⁸ *UK residents near solar farms to receive annual payments*, <https://solarstorageextra.com/uk-residents-near-solar-farms-to-receive-annual-payments/>

WEST WRATTING PARISH COUNCIL

10th / December / 2024

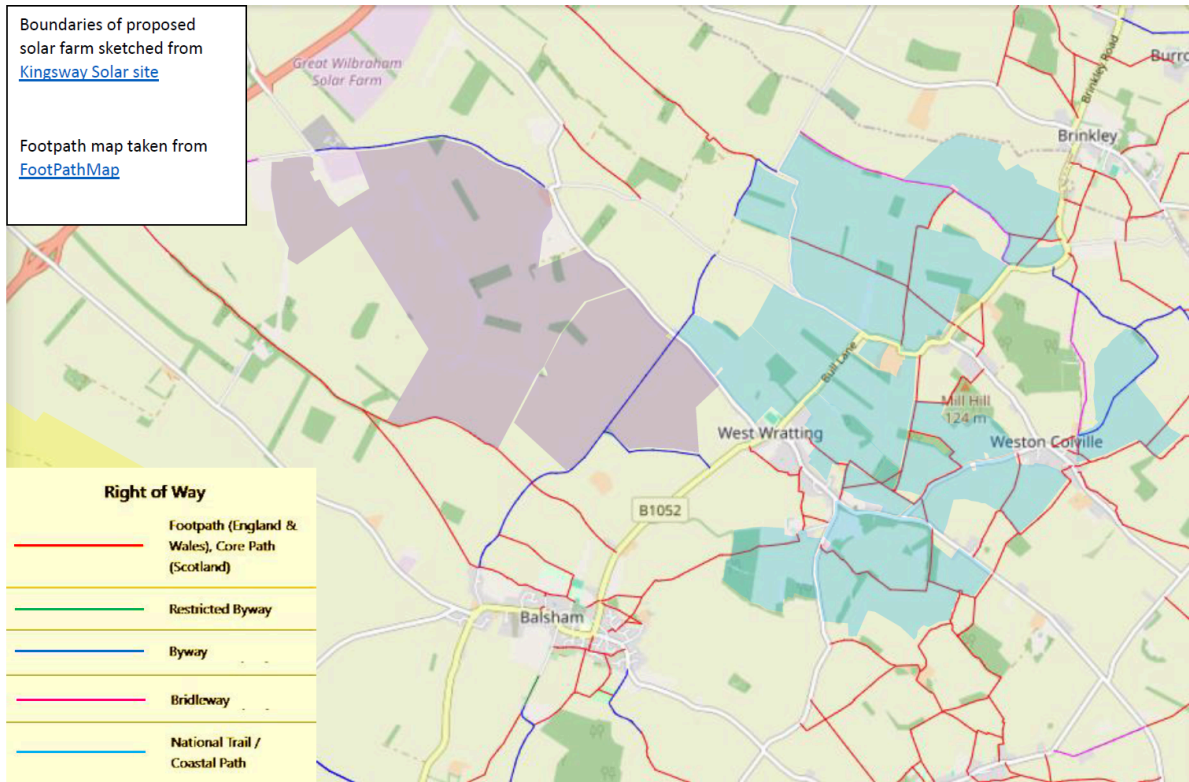
- **3.2** DRD must setup a repeating community grant (e.g., annual) similar to that available from Wadlow wind farm⁹, which is locally managed and incorporates more inclusive eligibility criteria.
- **3.3** DRD must set up a scheme to make free or heavily discounted solar panels available to homes and businesses in West Wrattling. The objection voiced by a representative of Kingsway Solar Farm, that it would be difficult to manage the allocation of this type of compensation can be dealt with in several ways, as evidenced by the fact that this has already been done at other solar farms, including a commitment to do this at least one owned by DRD¹⁰. The details of managing this compensation can be decided at a later date. It is reasonable to expect that through this scheme every home in West Wrattling could have solar panels well before half the life of the solar farm.
- **3.4** DRD must set up a grant scheme to assist individual homes and businesses in West Wrattling to purchase other green infrastructure, such as electric vehicle (EV) charging points, air source heat pumps, etc. Again, this compensation could be managed in several ways¹¹ and can be decided at a later date.

⁹ *Wadlow Wind Farm Community Fund*, <https://www.cambscf.org.uk/funds/wadlow/>

¹⁰ *Fair Park Solar Farm* which is only 49.9 MW offers 2 free domestic rooftop solar installations per year for residents in each Parish Council up to a value of £5,000 per installation. Scaling-up to the 500 MW of Kingsway would give 20 installations per year for each Parish Council, so after only 10 years every dwelling in West Wrattling would have solar panels.

¹¹ For example, by Action on Energy Cambridgeshire, <https://www.actiononenergycambs.org/>

Appendix: Footpaths affected by Kingsway Solar Farm



<https://drive.google.com/file/d/1amuc0ee6UQXiygsYcQJtwNythnrJ9T69/view?usp=sharing>