

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
Major Accidents and Disasters – Section 5.6		
5.6.7	<p>SCDC defer to Cambridgeshire County Council on this matter however SCDC wish to make the following comments from a public health perspective:</p> <p><u>Air Quality and Major Accidents and Disasters</u></p> <p>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</p>	Major Accidents and Disasters as a risk to human health must be scoped in to the EIA

	<p>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.</p> <p>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.</p>	
	<p><u>Human Health and Vulnerable Sub-Groups</u></p> <p>Referencing the Institute of Environmental Management and Assessment (IEMA) Guide to Determining Significance for Human Health in Environmental Impact Assessment, the EIA should:</p> <ul style="list-style-type: none"> • Include analysis of sub-groups of the population, rather than relying solely on generic health profiles. • 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. <p>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.</p>	

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. Further details provided within this table under relevant sections.
5.8.4	<u>Disagreement with Paragraph 5.8.4</u> 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> Currently, topics such as air quality, landscape and visual amenity, noise and vibration, and traffic and transport are referred to in the EIA	

	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	<p><u>Reptiles</u></p> <p>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.</p>	Reptile impacts should be scoped in.

	<p><u>Bat activity surveys</u></p> <p>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.</p>	Bat activity should be scoped in.
	<p><u>Preliminary Bat Roost Assessments</u></p> <p>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.</p>	The scope of the Preliminary Bat Roost Assessments should be extended to include a 50-metre buffer zone beyond the development boundary.
	<p><u>Ground-Level Tree Assessments for Bats</u></p> <p>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.</p>	The scope of the Ground-Level Tree Assessments for bats should be extended to a 50-metre buffer zone beyond the development boundary.
	<p><u>Badger Surveys</u></p> <p>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.</p>	The scope of the Badger surveys should be extended to cover a 30-metre buffer zone outside the development boundary
6.1.3	<p>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.</p>	All desk study data must be up to date at the time of submission

<p>6.1.4</p>	<p>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.</p> <p>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.</p>	
<p>6.1.5</p>	<p><u>Vegetation Surveys</u> 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.</p> <p>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</p>	<p>Detailed vegetation surveys of all development areas should be scoped in.</p>

	of year when many notable or protected plant species are unlikely to be detected.	
	<p><u>Invertebrates</u> 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.</p>	Invertebrate surveys should be scoped in.
Pages 114–115	<p><u>Formatting Errors</u> Pages 114–115 contain “Error! Bookmark not defined” formatting issues, which must be rectified as such errors are not acceptable in the submitted documentation.</p>	
Page 116:	<p><u>Bats</u> 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.</p>	As stated above, all bat activity should be scoped in.
6.1.6	<p><u>Construction/Operation/Decommissioning</u> 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.</p>	

	<p><u>Construction</u> 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.</p>	
6.1.7	<p><u>Ground-Nesting Birds</u> 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.</p>	Impacts on ground-nesting birds should be scoped in.
	<p><u>Wintering Birds (Including Raptors) and Turtle Doves</u> 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.</p>	Impacts on Wintering Birds (Including Raptors) and Turtle Doves
	<p><u>Bats (Foraging and Commuting)</u> 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</p>	All bat activity including foraging and commuting bats should be scoped in.

	<p>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 <i>Morge (FC) (Appellant) v Hampshire County Council (Respondent)</i>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.</p>	
	<p><u>Grid Connection Corridors</u> 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.</p>	
	<p><u>Bats – Legal Implications</u> 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.</p>	

¹ <https://www.supremecourt.uk/cases/uksc-2010-0120>

6.1.8	<p>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.</p> <p>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.</p> <p>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.</p>	
6.1.9	<p><u>Receptors/matters/ to be scoped out of further assessment (all sites)</u></p> <p>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 from 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.</p>	<p>Reptile impacts should be scoped in and remain under reviewed until design and development phases are progressed and then reassessed.</p>
6.1.9	<p><u>Roosting Bats</u></p>	<p>As stated above, all bat activity should be scoped in.</p>

	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	<p><u>Badgers</u> For similar reasons as roosting bats, Natural England require survey data to issue licenses, so further surveys should not be scoped out.</p>	Badger surveys should be scoped in.
	<p><u>Cumulative Impacts</u> 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.</p> <p>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.</p>	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	<p>Scoping Questions The following Scoping Questions set out at the end of the biodiversity section should be read in conjunction with the above comments.</p>	

Please note the questions were not numbered in the report, as such have been pasted below for clarity.

Q1. Do you agree with the proposed consultees to be engaged with on this topic?

SCDC Response: The list should include local stakeholder groups including but not limited to;

- Friends of the Roman Road
- Cambridge Past Present and Future
- Parish Councils

Q2. Do you agree with the proposed study areas?

SCDC Response: SCDC have set out additional buffers for species in the response provided above.

Q3. Do you agree that the data sources listed to inform the EIA baseline characterisation are appropriate?

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.

Q4. Do you agree that the surveys proposed to inform the EIA baseline characterisation are appropriate?

SCDC Response: In the response above, SCDC have set out where it is believed there are required changes

Q5. Are any receptors/assets/resources not identified that you would like to see included in the EIA?

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.

Q6. Do you agree with the proposed additional (secondary and tertiary) mitigation measures and is this mitigation appropriate?

SCDC Response: Details of mitigation are vague, so there can be no agreement until survey data is published and further mitigation details are provided.

Q7. Do you agree with the receptors/matters that are proposed to be scoped in and out of the EIA?

SCDC Response: No, and SCDC have made this clear in the above response.

Q8. Do you agree with the proposed factor-specific assessment approach?

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.

<p>Landscape and Visual – Section 6.2</p>		
	<p>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:</p> <ul style="list-style-type: none"> • 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. • 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; 	<p>Height and specification of the Solar PV system and its associated infrastructure should be scoped in.</p> <p>The impact of the development on the numerous footpaths and bridleways should be scoped in.</p>

	<p>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.</p> <ul style="list-style-type: none">• 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.• 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

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.

Q1. Do you agree with the proposed consultees to be engaged with on this topic?

SCDC Response:

- Para 2.6.2 references to the Planning Inspectorates Advice on Good Design, and a Design Approach Document (DAD).
- Para 2.6.5 identifies that “meaningful engagement will be carried out with communities and stakeholders,”
- 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.
- SCDC will expect engagement in relation to the LVIA/EIA which may affect the study area, data and policy sources and viewpoint selection.

Q2. Do you agree with the proposed LVIA study areas?

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.

Q3. Do you agree that the data sources listed to inform the LVIA are appropriate?

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.

It is not clear if data associated with PRow data has been included in the listing. This data is held by Cambridgeshire County Council.

Q4. Do you agree that the surveys proposed to inform the LVIA are appropriate?

SCDC Response:

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.

Q5. Are any receptors/assets/resources not identified that you would like to see included in the LVIA?

SCDC Response:

- 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

	<p>are confident it will be discussed within the LVIA but just felt it was worth calling out specifically within the listing</p> <ul style="list-style-type: none"> • 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. • 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. <p><u>Q6. Do you agree with the proposed additional (secondary and tertiary) mitigation measures and is this mitigation appropriate?</u> SCDC Response:</p> <ul style="list-style-type: none"> • 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). • 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. <p><u>Q7. Do you agree with the landscape and visual receptors that are proposed to be scoped in and out of further assessment?</u> SCDC Response:</p> <ul style="list-style-type: none"> • 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, 	<p>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.</p>
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	<p>routes such as The Common between West Wrating and Withersfield. Could an additional row be included which captures lesser routes and roads in the vicinity including High Streets and rural roads.</p> <ul style="list-style-type: none"> • 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 PRowWs. • 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. • OUT – NCA 86, GC LCA-1E, GC LCA-7B, GC LCA-7C, GC LCA-8A, GC LCA 9D – agreed. • Other LCAs outside of the SCDC boundaries are not considered applicable to SCDC review and consultation. • OUT – Listed settlements in Table 6.2.9 - agreed • OUT – A11, A14 and A1303 – agreed • 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. • OUT – All Other ‘Recreational and/or Tourist Sites’ listed below the Gog Magog Hills/Wandlebury entry are agreed. • OUT – All ‘Other’ entries at the end of Table 6.2.9 are agreed. 	<p>Worsted Roman Road, Fleam Dyke and Devil’s Dyke should be scoped in as secondary titles of parts of the Icknield and Harcmalow Ways.</p> <p>NCA 87 and 46 should be scoped in.</p> <p>Gog Magog Hills and Wandlebury Country Park should be scoped in.</p>
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Q8. Do you agree with the proposed factor-specific assessment approach?

SCDC Response: Assessment approach is acceptable.

Q9. Are there any specific viewpoints that you would like us to consider and/or illustrate as a photomontage?

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.

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?

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.

Historic Environment / Cultural heritage – Section 6.3		
6.3.14	<p>Scoping Questions</p> <p><u>Q1. Do you agree with the proposed consultees to be engaged with on this topic?</u></p> <p>SCDC Response: Yes</p> <p><u>Q2. Do you agree with the proposed study area?</u></p> <p>SCDC Response:</p> <ul style="list-style-type: none"> • (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. • 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). 	<p>The scoping should extend beyond the 2km/3km limit for assets identified.</p>
	<p><u>Q3. Do you agree that the data sources listed to inform the EIA baseline characterisation are appropriate?</u></p> <p>SCDC Response:</p>	<p>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</p>

	<ul style="list-style-type: none"> • 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. • 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.
	<p><u>Q4. Do you agree that the surveys proposed to inform the EIA baseline characterisation are appropriate?</u></p> <p>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 LVIA's 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.</p>	
	<p><u>Q5. Are any receptors/assets/resources not identified that you would like to see included in the EIA?</u></p> <p>SCDC Response:</p> <ul style="list-style-type: none"> • See response to question 2 (Q2). There are elevated locations outside the 2/3km limit but within the ZTV for 3.5m and 18m 	

	<p>(Appendix H) where designated assets should be tested for inclusion as part of the baseline surveys.</p> <ul style="list-style-type: none"> • See response to Q3. NDHAs are only identified through CHER at this stage and more may be identified. • 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 Wrating, Weston Colville, Weston Green, Carlton Green, West Wickham, Horseheath, etc. 	
	<p><u>Q6. Do you agree with the proposed additional (secondary and tertiary) mitigation measures and is this mitigation appropriate?</u></p> <p>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.</p>	<p>The offset/buffer from solar infrastructure to listed buildings should be scoped in beyond 10m.</p>
	<p><u>Q7. Do you agree with the receptors/matters that are proposed to be scoped in and out of further assessment?</u></p>	

	<p>SCDC Response: See comment under question 2 regarding 2/3km limit.</p> <p>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</p>	<p>Listed buildings in close proximity to the potential access point locations should be scoped in to Construction phase assessment.</p>
	<p><u>Q8. Do you agree with the proposed factor-specific assessment approach?</u></p> <p>SCDC Response: A full assessment of significance and potential impacts on setting should also take into account:</p> <ul style="list-style-type: none"> • 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. • Landscape and settlement character informing the setting of heritage assets. • 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. <p>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</p>	

3.2.5	<p><u>Chapter 3 (Alternatives):</u></p> <p>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.</p>	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		
	<p>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.</p> <p>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.</p> <p>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.</p>	<p>The potential risk of contamination from the Battery Energy Storage System (BESS) warrants that effects during the operational phase should also be scoped in.</p>

Air Quality - Section 6.5		
	<p>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.</p> <p>SCDC generally concurs with the applicant's methodology and statements. The guidance documents referenced in the proposed assessment methodology are also considered appropriate.</p>	
Noise and Vibration - Section 6.6		
	<p>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.</p> <p>The applicant has excluded operational vibration, operational road traffic noise, and potential impacts on SSSIs and SACs during construction, operation, and demolition.</p>	
	<p>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.</p>	<p>Third-octave bands in accordance with guidance such as NANR45 should be scoped in.</p>

	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> 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> 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.

6.8.3	<p><u>Statement of Community Engagement</u> 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 PRowWs and may be directly impacted by the proposal.</p>	
6.8.4	<p><u>Health Profile Assessment</u> 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.</p>	The baseline of the local health profile of residents should be scoped in.
6.8.5	<p><u>Private Property and Housing</u> 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.</p>	
6.8.5	<p><u>Health Effects on Individuals</u> 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</p>	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.

	loss of rural and natural views, and ongoing disturbance and nuisance during the construction phase.	
6.8.5	<p><u>Mental Health Assessment</u> 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.</p>	
6.8.5	<p><u>Recommendation for Mental Health Impact Assessment</u> 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.</p>	
6.8.5	<p><u>Missing Receptors</u> 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.</p>	
Climate – Section 6.9		
	<p>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.</p> <p>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</p>	Updates to baseline methodology to be scoped in when they become available.

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.

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.

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.

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).