

My ref: KWS-EIA Sc-140125
Date: 14th January 2025
Contact: Alice Tithecott
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Frank Jordan, Executive Director
**Place and Sustainability
Environment, Planning and Economy**

Sent via email to:
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Consents Team
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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		<p>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.</p> <p>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.</p>
Communities, Skills, Employment, Socio-economics		<p>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.</p> <p>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).</p>

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		<p>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.</p> <p>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.</p>
Noise		<p>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.</p> <p>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.</p>
Climate and Carbon		<p>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.</p> <p>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.</p>

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		<p>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.</p> <p>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.</p>
Health		<p>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.</p> <p>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)).</p> <p>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.</p>
Biodiversity	Scoping report	<p>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.</p>

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		<p>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).</p> <p>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).</p> <p>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).</p> <p>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).</p> <p>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).</p> <p>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 "<i>strips of panels as u1b6 and strips of vegetation as grassland</i>". 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</p>

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		<p>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.</p> <p>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).</p> <p>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).</p> <p>6.1.2 (page 86-87) It is recommended that proposed survey methodology and assessment are agreed in principle with the local authorities.</p> <p>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.</p> <p>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.</p> <p>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.</p>

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		<p>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).</p> <p>6.1.5 Baseline conditions should also consider present of Local Sites within 2km of the Site boundary, Non-statutory designated sites (p104) should include all Local Sites within 2km, including Hill Crofts and July Course Grasslands County Wildlife Sites.</p> <p>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</p> <p>6.1.5 (Page 117) Agree that Dormouse is unlikely to be present in this area of Cambridgeshire.</p> <p>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.</p> <p>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.</p> <p>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</p>

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		<p>Eversden and Wimpole Woods SAC. Consideration must also be given into any impact of the BESS during the operational phase.</p> <p>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.</p> <p>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.</p> <p>The only exception is impacts to Hazel Dormouse, which the council agrees should be scoped out.</p> <p>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.</p> <p>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 international importance 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).</p>
Archaeology and Historic Environment	Scoping Report/entire proposal	<p>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.</p> <p>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</p>

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		<p>mitigation options and likely significant effects. CHET does have concerns/reservations about some of the information and proposals presented.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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</p>

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		<p>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.</p> <p>A few specific comments regarding the scoping report:</p> <p>6.3.4 - will the aerial investigation be carried out by a specialist according to Historic England AIM principles?</p> <p>6.3.4 – as mentioned above, trial trenching will certainly be needed from a CHET perspective.</p> <p>6.3.5 - no reference to the intrusive archaeological work that has happened within the developable area? e.g. ECB3592</p> <p>6.3.7 - broadly agree with this</p> <p>6.3.9 - agree</p> <p>6.3.13 – add the trial trenching</p> <p>6.3.14 – answers to the applicant's questions:</p> <ul style="list-style-type: none"> • Do you agree with the proposed consultees to be engaged with on this topic? Yes • Do you agree with the proposed study area? Yes • Do you agree that the data sources listed to inform the EIA baseline characterisation are appropriate? Only if appropriate intrusive evaluation takes place • Do you agree that the surveys proposed to inform the EIA baseline characterisation are appropriate? Only if appropriate intrusive evaluation takes place • 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 • Do you agree with the proposed additional (secondary and tertiary) mitigation measures and is this mitigation appropriate? Yes, avoidance of impact or mitigation excavation • Do you agree with the receptors/matters that are proposed to be scoped in and out of further assessment? Yes • Do you agree with the proposed factor-specific assessment approach? Yes

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Landscape and Visual Impact		<p>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.</p> <p>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.</p>
Minerals and Waste		<p>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)</p> <p>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.</p> <p>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)</p>
Water Resources and Flooding		<p>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</p>

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		<p>water will be managed onsite although the applicant anticipates that surface water will be discharged to watercourses at Greenfield runoff rates.</p> <p>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).</p> <p>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:</p> <ol style="list-style-type: none"> 1. How the proposed surface water drainage scheme has been determined following the drainage hierarchy 2. Pre-development run-off rates 3. Post development run-off rates with associated storm water calculations 4. Discharge location(s) 5. Drainage calculations to support the design of the system 6. Drawings of the proposed surface water drainage scheme including sub-catchment breakdowns where applicable 7. Maintenance and management plan of the surface water drainage system (for the lifetime of the development) including details of future adoption <p>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.</p>
Traffic and Transport		<p>Transport Assessment</p> <p>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</p>

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		<p>Council https://www.cambridgeshire.gov.uk/business/planning-and-development/developing-new-communities</p> <p>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</p> <p>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</p> <p>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.</p> <p>The Transport Assessment should give details of the following:</p> <ul style="list-style-type: none"> · 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. · 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. · The proposed routing of vehicles to and from the Strategic Road Network with pinch points such as congested links and or junction being identified. · 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. <p>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.</p>

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		<p>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.</p> <p>Mitigation measures will be required to mitigate the impact of the development and enhance connections by sustainable modes.</p> <p>A Travel Plan for the construction phase should be submitted.</p> <p>Highway Development Management</p> <p>Main report Section 6.7 Pages 261 – 275</p> <p>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.</p> <p>6.7.5 Preliminary Tables are provided in relation to the suitability of the for links to cater for two-way traffic: for the:</p> <p><u>Baseline Condition of Road Links - Developable Area and Inter Array Connection Corridors</u></p> <p><u>Baseline Condition of Road Links - Grid Connection Corridors</u></p> <p>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 Gazetteer to determine ‘A’, ‘B’, ‘C’ and Unclassified Road status.</p> <p>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.</p> <p>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</p>

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		<p>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.</p> <p>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.</p> <p>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’.</p> <p>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.’</p> <p><u>App Part 1 (A to D) Appendix C Traffic Transport: EIA Significance Criteria Pages 357 - 364</u></p> <p>As noted above in relation to Main Report para 6.7.4, discuss data suitability with CCC TA Team.</p> <p>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.</p> <p>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:</p> <p>“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</p>

Specialism	Proposal aspect referred to	Comments
		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	<p>Public Rights of Way (PROW)</p> <ul style="list-style-type: none"> - 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. <p>Nevertheless, at this point we do have the following comments:</p> <ul style="list-style-type: none"> - 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. - 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. - 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”. <p>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</p>

Specialism	Proposal aspect referred to	Comments
		<p>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.</p> <ul style="list-style-type: none"> - 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. - 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. - 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.