

My ref: Kingsway-NonStat-121224  
Date: 12<sup>th</sup> December 2024  
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Frank Jordan, Executive Director  
**Place and Sustainability**  
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Dear Downing Renewable Developments,

**Non-statutory consultation by Downing Renewable Developments for Kingsway Solar Farm Development Consent Order (DCO) proposals**

I am writing on behalf of Cambridgeshire County Council (the Council) in response to the non-statutory consultation for the Kingsway Solar Farm proposals, which commenced on 31 October 2024 and closes on 12 December 2024.

Attached to this letter is a table containing the Council's views on the current proposals, across a number of technical specialisms. The Council reserves the right to comment further in the coming months as the proposals develop and more detail becomes available.

If you have any queries regarding this submission or require any further information, please contact [NSIPs@cambridgeshire.gov.uk](mailto:NSIPs@cambridgeshire.gov.uk).

Yours sincerely

**Frank Jordan**  
Executive Director, Place and Sustainability



## Kingsway Solar Farm: Comments on the Applicant’s Non-Statutory Consultation

This document sets out the comments by Cambridgeshire County Council (**the Council**) regarding Downing Renewable Development’s Non-Statutory Consultation for the Kingsway Solar Farm proposals.

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

Specialism	Proposal aspect referred to	Comments
Air Quality		The Council is not the statutory consultee for this subject area and so would expect Kingsway Solar Farm 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 and East Cambridgeshire District Council’s boundary. The Council would defer to South Cambridgeshire District Council and East Cambridgeshire District Council for a detailed response.
Communities, Skills, Employment, Socio-economics		<p>Cambridgeshire County Council welcomes the consultation including inviting suggestions for community benefits packages or initiatives. Cambridgeshire County Council looks forward to the results of the consultation and being part of discussions to further develop options, including the management of such a community benefit.</p> <p>The area proposed for this project is a rural area with village settlements. This area will have limited employment opportunities and limited transport options. Therefore, potential themes may include improving transport, access to green open space, local employment, and local access to green energy. A consideration should be made for a community fund to include enabling skills and connections to be developed locally, for all ages, as determined by those communities.</p> <p>We note a Statement of Community Consultation is to be produced by the promoter in advance of the Statutory Consultation. We welcome input from the local authorities into this.</p>
Noise		The Council is not the statutory consultee for this subject area and so would expect Kingsway Solar Farm 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

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		and East Cambridgeshire District Council's boundary. The Council would defer to South Cambridgeshire District Council and East Cambridgeshire District Council for a detailed response.
Climate and Carbon		<p>The Council is pleased to see the Environmental Impact Assessment scoping will include consideration of greenhouse gas emissions during construction, operation, and commissioning, however, the Scheme should prioritise avoiding emissions rather than reducing them where possible. Offsetting should only be used as a last resort if further reductions are not possible.</p> <p>The Council would like to see climate adaptation included within the environmental topics. It will be important for the Proposed Development to take future climate risks into account, in particular ensuring the infrastructure will be designed to withstand future climate scenarios.</p> <p>Acknowledging that the information provided so far is at a high level, the Council's Economy &amp; Climate Change team would welcome further discussion and consultation once more information is available.</p>
Health		<p>We recognise that the promoter is at the earliest stages of designing the scheme however we would like to highlight the following:</p> <ul style="list-style-type: none"> <li>● It is unclear in the 'Environmental Approach' document shared if there will be a Human Health chapter in the scope – it mentions 'Population' as a topic that will be covered. Best practice is a dedicated Human Health chapter ideally inclusive of a Health Impact Assessment or possibly an Integrated Impact Assessment as part of the EIA. Health impacts, inequalities and mitigations will and should be embedded across all the relevant chapters of the PEIR however a master summary ideally should be found in the Health Chapter.</li> <li>● A Mental Health Impact Assessment (MHIA) should be included within the scope of a Health Chapter.</li> <li>● An EQiA is also essential standalone document to ensure subgroups, vulnerable people etc are fully considered.</li> <li>● We welcome that Noise &amp; Vibration, Air Quality, Traffic and Transport etc will be assessed fully but highlight that Health is far broader than these elements alone and the wider determinants must be addressed within the scope as well as potential mitigation options.</li> </ul>

Specialism	Proposal aspect referred to	Comments
		<ul style="list-style-type: none"> <li>● The site covers 1500 hectares – which has significant impact on the landscape and visual amenity – this will be discussed within the ES however the relating mental health impacts for surrounding communities needs to be addressed in the MHIA.</li> <li>● Solar cell efficiency – commercial cells are typically 15-20% efficient. Due to the size of proposed sites A, B and C, understanding the project modelling, proposed cell efficiency and construction phase is critical in ascertaining whether the scope of the proposed solar farm is most effective in terms of size and efficiency. Does this in turn serve the community best in the locale in terms of their overall health and wellbeing etc.</li> <li>● Severance between West Wratting, Weston Green, Weston Coleville and Willingham Green by site C is a concern.</li> <li>● Cumulative impacts – Impactful Clustering of solar schemes i.e. Sunnica Solar Farm is within 14 miles of proposed sites AB&amp;C. There are a number of other solar developments in the area E.g., Great Wilbraham Solar Farm. These and other local developments need to be part of a cumulative impact assessment.</li> <li>● Construction process must be carefully reviewed from a human health perspective and including Construction Environmental Management Plans etc is essential.</li> <li>● Location of Battery Energy Storage Systems from a health perspective needs to be considered.</li> <li>● The County Council’s welcomes early and ongoing engagement throughout the DCO process.</li> </ul>
Biodiversity		<p>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 local national importance and other restoration schemes, such as chalk grassland quarry restoration at Wilbraham Chalk Pit (planning reference CCC/24/110/DCON). The scheme should help 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>

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		<p>The scheme must be designed to avoid both direct and indirect adverse impacts to statutory and non-statutory nature conservation sites, irreplaceable and priority habitats and protected, priority and notable species.</p> <p>The scheme design must consider the cumulative impacts from other projects and plans, particularly other solar farm developments and cabling within the landscape. For example, opportunities to utilise the same alignments for the cabling route across the Devils Dyke SSSI (verge at Burwell Road) and horizontal directional drilling under Burwell Disused Railway County Wildlife Site as used for the North Angle Solar Farm and Swaffham Prior Energy Centre (planning application CCC/22/083/FUL), unless an alternative route with less impact is identified.</p> <p>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.</p> <p><u>Wildlife Sites</u></p> <p>The scheme must consider impact to international sites within 10km of the scheme, including Devil's Dyke SAC and its Lizard Orchid population, Fenland Special Area of Conservation, Wicken Fen Ramsar and Chippenham Fen Ramsar, or 30km for sites designated for bats. Discussions with Natural England should also be completed to confirm the requirements for reports produced to inform Habitat Regulations Assessment (both stage 1 and 2, and possibly 3).</p> <p>Schemes should also consider impacts to national sites within 10km, including Devil's Dyke, Fleam Dyke, Balsham Woods, Newmarket Heath, Roman Road SSSI, Wicken Fen, and Chippenham Fen and Snailwell Poor's Fen Sites of Special Scientific Interest.</p> <p>The Scheme should also consider how to avoid impacts to Local Sites located within 2km of the scheme, including Worsted Lodge RSV, West Wratting Valley Farm RSV, Old Cambridge Road Verges, Great Coven's Wood and Lower Wood, Hill Crofts, Brinkley Wood, Brinkley Hall Veteran Trees, Heath Road / Street Way Green Lanes, July Course Grasslands, Bottisham Park, Beacon Course Green Lane and Pauline's Swamp County Wildlife Sites.</p>





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		<p>Please note that Cambridgeshire Geological Society are looking at potential candidate Local Geological Sites / Local Geological Sites within this area and therefore, we recommend future discussions are held with Cambs Geological Society.</p> <p><u>Species</u></p> <p>The scheme must be designed to avoid impact to protected, priority, notable and locally important (Cambridgeshire and Peterborough Additional Species of Interest) species. Ecological assessment should include consideration of impacts to these species, for example bats, badger, bats, reptiles, amphibians (including great crested newts), water vole, otter, breeding &amp; wintering birds, flora and terrestrial and aquatic invertebrates. With particular attention paid to:</p> <ol style="list-style-type: none"> <li>1. 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, we 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.</li> <li>2. Farmland birds - solar farms have the potential to provide additional food resources for farmland birds. However, they can also displace ground nesting birds that nest in open habitat, such as skylark. It is therefore important that a full suite of bird surveys are completed to identified potential impact and adequately mitigation provide, including loss of nesting opportunities. Any residual impacts to farmland birds will need to be provided off-site compensation.</li> </ol>

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		<p>3. Invertebrates - solar farms can also impact invertebrates, such as 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> <p><u>Biodiversity Net Gain</u></p> <p>The scheme should seek to deliver at least 20% Biodiversity Net Gain, in accordance with Greater Cambridge's Biodiversity Supplementary Planning Document. 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>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. We would expect the majority of habitat within the solar panels will be classified as modified grassland, to reflect the limited diversity of flora capable of being delivered in the stressed and shaded conditions.</p>
Archaeology and Historic Environment		<p>The council notes the (very high level) information submitted with this non-statutory consultation states the historic environment will be scoped in to the applicant's Environmental Statement (ES), and that Cambridgeshire Historic Environment Team (CHET) is listed as a key stakeholder who will be consulted. As a broad approach, we support and welcome this.</p> <p>The applicant states that an EIA Scoping Report is being developed, and that survey/baseline data collection has begun. It should be noted that CHET has not been consulted or contacted by Kingsway Solar on the nature and scope of historic environment surveys that may be needed to support the eventual DCO application, beyond some contact with a geophysical survey sub-contractor. The size of the area that requires archaeological survey and evaluation is extremely large, and therefore gathering adequate archaeological information to support the eventual application will take some time – therefore early engagement with CHET is critical.</p>

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		<p>Data in the Cambridgeshire Historic Environment Record indicates a very high potential for archaeological remains of all periods within the proposed development areas. The Roman road of Worstead Street (a Scheduled Monument) directly abuts the western edge of Site A. There are several scheduled barrows (Bronze Age or Neolithic) nearby, and numerous cropmarks of ring ditches and enclosures within the boundaries of the site. Site B is directly adjacent to the Fleam Dyke, a Saxon earthwork that is also a Scheduled Monument, at its southern end, and a continuation of the monument could theoretically enter the site. Limited archaeological excavation has revealed concentrations of prehistoric features within Site B, and there are, again, numerous cropmarks of enclosures and ditches. Site C is directly adjacent to a Scheduled medieval moat, and there are earthwork remains of a possible deserted medieval village within the site – this is of particular concern for the mounting of solar panels. Again, the area is heavily populated with cropmarks indicative of significant archaeological remains.</p> <p>In common with other NSIP solar projects within Cambridgeshire and regionally, the proposed development site will need to be subject to geophysical survey and trial trenching, as a minimum, to inform the Environmental Statement. Any areas of earthworks may require a different approach.</p>
Landscape and Visual		<p>The Council would expect Kingsway Solar Farm 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 and East Cambridgeshire District Council's boundary. The Council would defer to South Cambridgeshire District Council and East Cambridgeshire District Council for a detailed response.</p> <p>The Council reserves the right to comment on this subject through technical working groups and future consultation, in particular where it relates to users of public rights of way.</p>
Land Use, Quality, Soils and Agriculture		<p>The Council reserves the right to comment on this subject through technical working groups and future consultation when more information is available.</p>
Minerals and Waste		<p>Cambridgeshire County Council has identified the following that the promoter will need to consider.</p> <p><b>Great Wilbraham Quarry (Safeguarded Mineral Site)</b></p>



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		<p>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><b>Sand &amp; Gravel and Chalk Mineral Safeguarding Areas</b></p> <p>Parts of the site lie within Chalk and Sand &amp; Gravel Mineral Safeguarding Areas. The developer will wish to address the presence of the mineral resources and Policy 5 of the Cambridgeshire and Peterborough Minerals and Waste Local Plan within their Environmental Statement. Given the nature of the development, the Minerals and Waste Planning Authority is satisfied that prior extraction is not feasible, but best use should be made of any mineral incidentally extracted as part of the development.</p>

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		 <p><b>Key:</b>   West   Centre   East</p> <p>The proposals for Kingway Solar involve three land parcels. The land in the project will include the development of the solar panels and related infrastructure, and areas reserved for the potential environmental mitigation and enhancement zones, recreational areas and community benefit initiatives.</p>
Water Resources and Flooding		<p>Whilst it is acknowledged that limited information is available at this stage, Cambridgeshire County Council would like to highlight the following:</p> <p>All sites appear to be at very low/low surface water flood risk with existing watercourses that intersect the sites. We strongly recommend that ditches for which the landowner is the riparian owner are maintained appropriately and enhanced where possible (e.g. with obstructions to flows such as debris, litter, and fallen</p>

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		<p>trees removed) to ensure effective drainage of the site. Although the sites are at low risk of surface water flooding, altering any natural flow paths should be avoided where possible. Consideration should be given to the design and layout of the Battery Energy Storage System (BESS) and the drainage of the site including when necessary containment. The site layout should clearly demonstrate access for maintenance of any existing and proposed drainage infrastructure.</p> <p>If crossings over ordinary watercourses are required, either through temporary or permanent works. Any such crossings will need to be designed in accordance with <u>Cambridgeshire County Council's Culvert Policy</u> and separate permission will be required for each crossing.</p> <p>Consideration should be given to drainage of the Photovoltaics (PVs) panelled areas - particularly during the establishment of vegetation, as well as any impermeable/semi-permeable areas created as part of the BESS.</p> <p>Cambridgeshire County Council Flood Risk Team encourages the inclusion of measures within the development to reduce the impact of channelised flows and promote the infiltration of water into the ground or the collection of water using an appropriate rainwater system, including:</p> <ul style="list-style-type: none"> <li>• Siting solar arrays along ground contours (wherever possible) such that water flow between rows is dispersed evenly beneath them</li> <li>• Incorporating bunds, filter drains or other measures to interrupt flows of water between rows of solar arrays to disperse water flows over the surface and promote infiltration into the soils.</li> <li>• Incorporating wide grassed filter strips at the downstream side of blocks of solar arrays and maintaining the grass at a long length to interrupt water flows and promote infiltration.</li> <li>• Incorporating gravel filled filter drains or swales at the downstream side of blocks of solar arrays to help infiltrate run-off (where ground conditions allow).</li> </ul> <p>No runoff should leave the site up to the 1% AEP + CC storm.</p> <p>Water quality should be addressed in line with the Simple Index Approach set out in the CIRIA SuDS Manual.</p>

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		<p>A maintenance plan detailing the maintenance activities, frequencies and responsibilities will be required.</p> <p>A Construction Environmental Management Plan (CEMP) will be required demonstrating that surface water can be managed appropriately during the construction phase without causing detriment to water quality.</p>
Traffic and Transport		<p>Any application made should be supported by a Transport Assessment (TA), the TA should be in accordance with Cambridgeshire Transport Assessment Requirements. The TA should show what impact the proposed development would have on the highway network.</p> <p>In the document: 'Kingsway Solar Environmental Approach' it is noted that Traffic and Transport is going to be considered at a later date. It does not include the assessment of the carbon impacts of transport which should be carried out. It also does not include details of how sustainable transport use will be maximised and also if alternatives to road transport have been considered both for construction and use. The further work on Traffic and Transport should review and develop the approach in line with local policy and strategy. These include but are not limited to:</p> <p><a href="https://cambridgeshirepeterborough-ca.gov.uk/what-we-deliver/transport/local-transport-plan/">Local Transport and Connectivity Plan - Cambridgeshire &amp; Peterborough Combined Authority</a></p> <p><a href="https://cambridgeshirepeterborough-ca.gov.uk/what-we-deliver/transport/local-transport-plan/">https://cambridgeshirepeterborough-ca.gov.uk/what-we-deliver/transport/local-transport-plan/</a></p> <p><a href="https://www.cambridgeshire.gov.uk/residents/travel-roads-and-parking/transport-plans-and-policies/cambridgeshires-active-travel-strategy">Cambridgeshire's Active Travel Strategy   Cambridgeshire County Council</a></p> <p><a href="https://www.cambridgeshire.gov.uk/residents/travel-roads-and-parking/transport-plans-and-policies/cambridgeshires-active-travel-strategy">https://www.cambridgeshire.gov.uk/residents/travel-roads-and-parking/transport-plans-and-policies/cambridgeshires-active-travel-strategy</a></p> <p><a href="https://www.cambridgeshire.gov.uk/residents/travel-roads-and-parking/transport-plans-and-policies/transport-strategy-for-east-cambridgeshire">Transport Strategy for East Cambridgeshire   Cambridgeshire County Council</a></p> <p><a href="https://www.cambridgeshire.gov.uk/residents/travel-roads-and-parking/transport-plans-and-policies/transport-strategy-for-east-cambridgeshire">https://www.cambridgeshire.gov.uk/residents/travel-roads-and-parking/transport-plans-and-policies/transport-strategy-for-east-cambridgeshire</a></p> <p>The TA to be scoped with Cambridgeshire County Council should be augmented with:</p> <ul style="list-style-type: none"> <li>• Construction Environment Management Plan &amp; Construction Traffic Management Plan</li> </ul>

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		<ul style="list-style-type: none"> <li>● Travel Plan for Construction Operatives</li> </ul> <p>The TA must consider traffic generation through the construction, operational and de-commissioning phases to assess all vehicle routing, such assessments reflecting the fluctuation in vehicle types and frequency in relation of the proposed development with due regard to existing traffic flows, and the potential need to accommodate HCV's and Abnormal Indivisible Loads (AIL).</p> <p>The TA should identify key strategic routes ('A' Classification), secondary and minor routes, assessing their suitability to cater for the anticipated construction traffic with due regard to vehicle types/ frequencies and flows and identify any necessary mitigation measures (i.e. carriageway widening/ bend improvements/ passing places etc) and clearly identify whether such mitigation are temporary or permanent, and achievable within land in the public highway or the DCO area.</p> <p>It is recommended that pre application advice for a Transport Assessment is sought from the County Council and the scope of the Transport Assessment agreed with the council to ensure the assessment area and various details are identified at early stage. Details for the County Councils pre application advice can be found at <a href="https://www.cambridgeshire.gov.uk/business/planning-and-development/developing-new-communities">https://www.cambridgeshire.gov.uk/business/planning-and-development/developing-new-communities</a>.</p> <p>Any Transport Assessment should be written in accordance with The County Councils Transport Assessment Guidance. Details can be found for the Transport Assessment Guidance on the same web page as above.</p> <p>The Transport Assessment should focus on both the construction element of the development, operation, and decommissioning stages. (Should there be a need to replace equipment on a significant scale during the operational stage, we would also look to include as part of the Transport Assessment). Details of how sustainable transport use will be maximised and if alternatives to road transport have been considered both for construction and use should be included. Travel Plan information for the various phases should be included. Any approach should be in line with local policy and strategies and include relevant mitigation.</p>

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		<p>The overarching principle of the scheme should be to minimise the use of the public highway by means of providing access at the closest point to any 'main' highway, and utilising internal haul roads wherever possible.</p> <p>The verified/ physical extent of any public highway should be acquired from Cambridgeshire County Council Highway Records Team in the form of a 'detailed' Search to inform the assessment and designs/ siting of accesses/ achievement of mitigation measures etc: note that not all features form part of the public highway (i.e. ditches/ drains do not usually form part of the public highway but are in riparian ownership). A link to more information is available here. <a href="https://www.cambridgeshire.gov.uk/business/highway-searches">https://www.cambridgeshire.gov.uk/business/highway-searches</a></p> <p>The submission should provide details of accesses and associated infrastructure with respect to:</p> <ul style="list-style-type: none"> <li>● Whether access is temporary or permanent</li> <li>● Assess access visibility (with regard to nature of the highway) – where reduction in standards to be supported by empirical data in the form of speed surveys to DMRB requirements.</li> <li>● Need for any permanent Traffic Regulation Orders/ Speed Limit Orders/ Temporary Traffic Regulation Orders/ Temporary Traffic Control (signals) to make any access suitable in the short/ long term.</li> <li>● Access geometry suitable to cater for the level of traffic proposed with due regard to the nature of the highway from which access is gained.</li> <li>● Vehicle tracking to be provided at all accesses.</li> <li>● Access construction and operational methodology to prevent mud and debris being trafficked onto the public highway, including wheel wash facilities.</li> <li>● Gate locations (set-back for largest vehicle utilising accesses).</li> <li>● Management of surface water at site access/ public highway interface.</li> <li>● Ditch/ drain infilling identified as required – together with approval of LLFA or relevant drainage authority.</li> </ul>

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		<ul style="list-style-type: none"> <li>● Safety assessment with regard to all above and existing recorded personal injury accident records.</li> </ul> <p>It is strongly recommended that a comprehensive package is submitted for each access point addressing the above points, such that comprehensive assessment can be undertaken.</p> <p>Further:</p> <ul style="list-style-type: none"> <li>● Locations of compounds/ parking/ servicing/unloading to be clarified</li> <li>● Condition Surveys will be required for non-strategic highways including methodology for assessment, review through the construction period, management and reinstatement of any damage caused by construction traffic.</li> <li>● Locations of direct crossing of highways whether vehicular or cable crossing etc – need for Street Works licences etc</li> </ul> <p>The County Council will require all works within the public highway to be constructed to County Council specifications, and to be secured by a S278 agreement outside of the Protective Provisions.</p> <p>The Local Highway Authority welcomes early and ongoing engagement throughout the DCO process.</p>
Public Rights of Way (PROW)		<p>The plans made available for review as part of the consultation are not sufficiently detailed to enable us to fully consider which Public Right of Ways (PROW) are affected, directly or indirectly, by the proposals.</p> <p>A landscape and visual impact assessment (LVIA) study area should be identified so that the impact on PROW and receptors using PROW can be fully understood.</p> <p>Nevertheless it is clear that the proposed development has potential to dramatically impact PROW in this part of South Cambridgeshire. Site C in particular intersects with a large number of PROW in a concentrated area. In line with NPPF para 104 and the Cambridgeshire <i>Rights of Way Improvement Plan</i>, Cambridgeshire County Council requires that development should look to maximise opportunities for</p>

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		<p>enhancement to the PROW network, and that any negative impacts of development on PROW should be effectively mitigated. Cambridgeshire County Council welcomes opportunities to engage with the applicant on this subject.</p> <p>Any LVIA should consider the impact of the development on different types of receptors who have a right to use the PROW network. For instance, bridleway users may experience different impacts to footpath users, as a result of travelling on horseback or by bicycle; the impact of glint and glare on these users is likely to differ to that on pedestrians and should be considered in any assessment.</p> <p>The grid connection corridors outlined in the consultation will also impact a number of PROW. The impact of the development on PROW within the main development sites A, B and C, and within the connection corridor, will need to be closely considered as part of any access measures and mitigation planning. Robust measures to protect public access during the delivery phases should be provided in the Construction Traffic Management Plan, and Construction Code of Practice, as well as ensuring that the pre-existing condition of PROW is restored (or enhanced) post-construction.</p> <p>It is also unclear from the plans exactly which of the outlined land areas are included within the area of the proposed development, and which are not. Cambridgeshire County Council requires clarity on this matter to assist in assessing the potential impacts and determining where the promoter will be able to deliver public access enhancements. Cambridgeshire County Council's preference is that any mitigation for loss of amenity on the PROW network should be compensated for in the form of permanent new/alternative PROW.</p>
Emergency Planning		<p>It would be constructive to ensure liaison with the Cambridgeshire and Peterborough Local Resilience Forum to ensure that aspects of emergency response are considered regarding both the facility, and sites that may be in the vicinity.</p> <p>Cambridgeshire County Council encourages the promoter to engage with Cambridgeshire Fire and Rescue Service, in particular to discuss the location and design of the Battery Energy Storage System (BESS).</p>
Consents Team	Sub Station connection and cable route	<p><b>New Substation</b> New National Grid Sub Station to be located south of the existing substation at Burwell. The county would like more details as to the status of plans for the new sub-station, location and timescales. Furthermore,</p>



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		<p>confirmation if this is coming forward as a separate planning application by National Grid. Lastly it would be helpful to understand the status of the agreement in place with National Grid for the connection.</p> <p><b>Cable route</b> Part of the cumulative impact assessment should consider the existing overhead pylon cable route to Burwell. It is noted cable route A appears to align with the exiting cable route and crosses both site A and B.</p> <p>It would be helpful to understand in developing the two cable route options if a connection to the National Grid line at the point it passes through sites A and B was considered, and if so why it is not an option being taken forward.</p>
	Cumulative effect	<p>Noting the existing solar farm located north west of site B and the wind farm within site B. The cumulative impact for these needs to be considered as part of the Environmental Statement.</p> <p>It should also be noted the wider development of solar farms and battery storage in the area including near to Burwell substation, and the large scale 500MW Sunnica Energy Farm to the north. Consideration needs to be given to this wider area and the cumulative impact. (Please also see comment under Health above).</p>
	Site C and West Wrating and Weston Green	<p>Whilst appreciating sites A, B and C will be designed to include within their boundary, landscaping and other mitigation measures as well as solar PV panels, site C does surround West Wrating on the north, east and south sides. It also borders the north and south of Weston Green. Particular consideration is needed to be given to the design and its impacts for the two communities.</p>
	'Our approach to the Environment'	<p>EIA – Look forward to engaging with Kingsway to scope the EIA.</p>