



**PARISH COUNCIL**

29 Great Lane  
Reach  
Cambridgeshire  
CB25 0JF  
8 January 2025

Dear Deb Glassop,

**EN010165 Proposed Solar Farm and Battery Storage  
Scheme**

**Cambridgeshire**

**Kingsway Solar's Scoping Report**

Your letter and attachments of 17 December 2024 refer.

Reach Parish Council has reviewed Kingsway Solar's Environmental Impact Analysis Scoping Report (SR) and listened to the views of concerned members of the community we represent. In its current form, we consider the SR an inadequate basis for producing an Environmental Statement (ES) and thereafter an Environmental Impact Analysis (EIA).

Firstly the SR has significant omissions. The SR makes no reference to Reach's Neighbourhood Plan (NP) which was made in February 2024 following a turnout of almost 60 per cent of the electorate. This extremely high level of engagement demonstrates our community's commitment to preserving and enhancing our neighbourhood and its unique landscape.

A copy of the NP is attached to this letter. It details those things that make Reach a special place to live and about which residents are very clear they wish to protect. In the context of Kingsway Solar's proposal Policy RCH 6 is most pertinent:

*As appropriate to their scale, nature and location development proposals should:*

- i. have regard to, and conserve or enhance, the rural character and the setting of the village as identified in the Reach Landscape Appraisal;*
- ii. not result in the erosion of the settlement gaps identified on the Policies Map;*
- iii. ensure that there is no unacceptable impact on the key features of important views identified on the Policies Map and described in the Appraisal of Important Views; and*
- iv. respond positively to the Landscape Appraisal Development Guidelines, identified in Table 1 of the Neighbourhood Plan.*

Elsewhere the Reach NP articulates the key landscape features of our neighbourhood that we believe are worthy of protection, noting *'there are significant areas of national archaeological, historical and environmental interest within its (i.e the neighbourhood of Reach's) bounds. The village's form strikingly reflects its rich past and its relationship with the landscape. It is remarkably unchanged for several centuries. It is defined by an artificial spine of the Devils Dyke - Fair Green - The Hythe and Reach Lode that runs through the entirety of the neighbourhood and reflects land use going back to at least the Saxon Period.*

*The Devils Dyke is the largest Anglo-Saxon earthworks in the country.'*

It follows that Reach PC expects Kingsway's ES and subsequent EIA to meet the requirements of RCH6 of the Reach NP wherever its proposal impacts on the neighbourhood of Reach. We also expect the ES to acknowledge and accommodate the wider sentiments of residents of Reach as articulated in the NP.

The SR omits reference to the following assets of the village:

- community orchard, native woodland and equestrian arena at the 24 Acres
- Village Hall
- Church

All could be adversely affected by this proposal.

The SR fails to list the National Trust (NT) as a consultee despite recognising that the land within the proposed connection corridors is hydrologically linked to Wicken Fen (4.2.7) and the lands of the Wider Wicken Vision (WWV) for which the NT is responsible and despite the potentially highly significant visual impact on some of this land were this proposal to be approved. For example, much of the proposed eastern connection corridor is visible from the NT Adventurer's Car Park, a key gateway into the WWV. Approximately two thirds of the of the neighbourhood of Reach lies within the WWV area.

On the specifics of what is in the SR, Reach PC's concerns focus on the visual impact, at a landscape scale, of the proposed construction of a 440kV overhead pylon and cable (OHL) to connect the proposed PV arrays to the national grid at a new substation, termed Burwell South,

which we infer is needed primarily or solely because of Kingsway's proposal.

Kingsway's SR states that National Grid has yet to determine the exact location or footprint of the Burwell South substation. The SR offers no date on which this clarification will be made. It is possible that the new substation will be located closer to Reach than the existing substation which lies in the parish of Burwell. Wherever it is located, by dint of the layout and outlook of Reach, it is likely to have a profound visual impact on our community.

Rather than delineating a precise route for cabling connecting the PV arrays to the national grid, the SR offers two broad 'connection corridors' to mitigate uncertainty about the location the substation. The corridors are in places 3 km wide and together they occupy an area in excess of 40 square km. No field studies or initial visual impact assessments have been undertaken. However, as the SR acknowledges, the landscape and ecology within the corridors varies considerably. In these circumstances we are sceptical that a sufficiently forensic or granular examination of the impact of connecting the proposed scheme to the national grid could be produced on the basis of this SR (see elements of 6.2.2 for example). This is particularly important as the sentiments of the SR are to downplay the impact of an OHL on our neighbourhood and more widely. As a point of important detail on the parameters of a Visual Impact Assessment, we do not accept that the 3 km 'buffer' proposed by Kingsway (beyond which there would be limited impact) is acceptable given the flat and open landscape to the north and west of the proposed connection corridors.

In summary, we consider that such vagueness and uncertainty in respect of key elements of Kingsway's SR would lead to an EIA that is equally imprecise and inadequate for all parties. We therefore request that the EIA process is delayed until Kingsway is able to:

- clarify its preferred connection route and to narrow its width to enable a meaningful landscape impact assessment to be undertaken
- say exactly where connection to the national grid would be made
- outline the infrastructure required at the new substation to import the electricity into the national grid

These requests will clearly require Kingsway to collaborate with National Grid to a greater extent than is evident at present. However we consider the exclusion of the environmental impact of a new substation at Burwell South required to accommodate the feed from Kingsway's proposal would be perverse if consideration of this proposed NSIP(s) is to be rigorous and comprehensive.

Finally we note that Kingsway makes reference to the possibility of placing its connection underground (2.8.3). Whilst Kingsway's preference appears to be for an overhead connection, we advise that the Sunnica Solar Farm scheme (which is of similar scale and distance from a national grid connection to Kingsway's proposal) adopted underground connection to the national grid from the outset. This strongly suggests that an underground connection would be technically and financially feasible. We therefore request that an underground connection option is assessed in exactly the same way as OHL routes for the entirety of Kingsway Solar's chosen route.

We should be grateful for acknowledgement of this letter, a copy of which goes to Charlotte Cane MP.

Yours sincerely,

Susan Bailey

## **Clerk to Reach Parish Council**