

PINS Reference: EN010165
Contact (DCO Lead): Claire Shannon
Claire.shannon@greatercambridgeplanning.org

14th January 2025

KingswaySolar@planninginspectorate.gov.uk
Electronic submission only

Dear Sir / Madam

Application by Kingsway Solar Farm Limited / Downing Renewable Developments for an Order Granting Development Consent for the Kingsway Solar Project (PINS ref: EN010165): – EIA Scoping Report Response

Introduction

1. I am writing on behalf of South Cambridgeshire District Council in response to the EIA Scoping consultation request issued by the Planning Inspectorate (PINS) on the 17th of December for the Kingsway Solar Development Consent Order (DCO).
2. South Cambridgeshire District Council, herein referred to as 'SCDC' or 'the District Council,' has been advised that it is one of the host authorities for the DCO process along with Cambridgeshire County Council, herein referred to 'CCC' or the 'County Council' and East Cambridgeshire District Council (ECDC).
3. The Applicants, Kingsway Solar Farm Limited / Downing Renewable Developments have commissioned an Environmental Impact Assessment (EIA) Scoping Report, dated December 2024, in accordance with Regulations 10 and 11 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (hereafter referred to as the 'EIA Regulations').

Engagement and Duty to Consult

4. The Applicants undertook Phase One Non-Statutory Consultation (NSC 1) between October 31 and 12 December 2024 without engaging with or formally notifying SCDC, which left the District Council with very limited time to respond.
5. Due to the minimal information provided during NSC 1, SCDC anticipated that the EIA Scoping process would offer a more meaningful and comprehensive opportunity to discuss the proposal's technical impacts before submitting the scoping report to PINS. Unfortunately, this opportunity has not materialized. In its response to NSC 1, SCDC

strongly advised the Applicants to undertake meaningful pre-application engagement in advance of the EIA process. However, no such engagement has taken place.

6. Furthermore, SCDC had anticipated that the Scoping Request would be submitted after the Christmas period, in line with advice issued by PINS (Section 51 Advice Log, dated 13 November 2024). However, the Applicant submitted the Scoping Request to PINS on 17 December 2024 without any prior notification to the District Council.

EIA Scoping Report

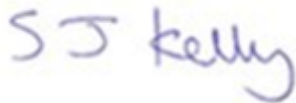
7. Notwithstanding the above, the Council has reviewed the EIA Scoping Report and provided technical comments, as detailed in Table 1 appended to this letter. Key additional areas for scoping have been highlighted in the third column of the table.
8. Please note that there are numerous formatting errors and missing references, including repeated instances of “*Error! Bookmark not defined,*” which are unacceptable. These errors have made the report difficult to navigate and understand. As a result, the District Council has again been unable to carry out the comprehensive review it strives to provide.
9. Additionally, the EIA Scoping Report does not read as a cohesive or comprehensive document. In particular, the report is difficult to interpret, as parts of it appear to have been based on a previous site plan where Parcel C was not included. Furthermore, the report seems to incorporate content from documentation for other NSIP solar farms. For instance, in section 4.11.6, the list of directions and distances of habitats from the solar farm suggests it was copied from the Sunnica (ref: EN010106) documentation.
10. The District Council raises concerns about whether the submitted EIA Scoping Report is adequate, complete, and compliant with the requirements outlined in Regulations 10 and 11 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. Nevertheless, the Council reserves the right to offer further comments on the scope of the Environmental Impact Assessment (EIA) in future submissions. This includes, but is not limited to, feedback on the Preliminary Environmental Information Report (PEIR) and other instances where insufficient information may have led to certain impacts being excluded from consideration. In such cases, the Council retains the right to challenge the adequacy of the EIA Scoping.

Conclusion

11. Notwithstanding the above, the Council has reviewed the Environmental Impact Assessment Scoping Report as submitted and provided technical comments as outlined in this letter and appended table. Please so note however that these

comments are made on a without prejudice basis, and the Council reserves the right to provide further additional comments on the Development Consent Order (DCO) application during the statutory consultation stages and at the Public Examination.

Yours faithfully



Stephen Kelly
Director of Planning & Economic Development
On behalf of: South Cambridgeshire District Council

Encl. Table 1: Response to EIA Scoping Report