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Subject: Formal Objection – Kingsway Solar Farm and Battery Energy Storage System (Stage 2 Statutory Consultation)

Dear Sir or Madam,

I write on behalf of Carlton-cum-Willingham Parish Council to record our ongoing, unwavering, and **strong objection** to the Kingsway Solar Farm and associated Battery Energy Storage System (BESS), currently under statutory consultation. We recognise the importance of renewable energy and support well-planned solar infrastructure, but this proposal, in both its scale and siting, poses unacceptable risks to the local environment, heritage, and community.

The development, as currently presented, is inconsistent with the principles of sustainable and proportionate planning.

Parish Voice

In preparing this objection, the Parish Council rightly invited parishioners to contribute their views. Individual letters have been submitted separately; however, we have undertaken a thematic analysis of their content and included specific references throughout this response to illustrate the overarching distress and concern that this project has generated within our community.

Consultation process

We must begin by acknowledging the enormous weight of the obligation placed upon local communities during a Nationally Significant Infrastructure consultation. Ordinary parish representatives, volunteers, and residents are being asked to interpret and respond to hundreds – if not thousands of pages - of highly technical documentation within limited time and without the benefit of professional training or independent guidance. This is, for most, an untenable position, one which risks silencing legitimate concern beneath procedural complexity. Any inaccuracies in parish council and community responses should therefore not be construed as misrepresentation but as the genuine expression of a parish confronted with an industrial-scale proposal of unprecedented magnitude, threatening to alter a landscape that has borne continuous human settlement and **recorded heritage for over a thousand years.**

Residents note that the Construction Traffic Management Plan is deferred to post-consent, leaving road safety and amenity “currently unassessed,” which is inconsistent with meaningful consultation on a scheme of this magnitude.

Rochdale envelope

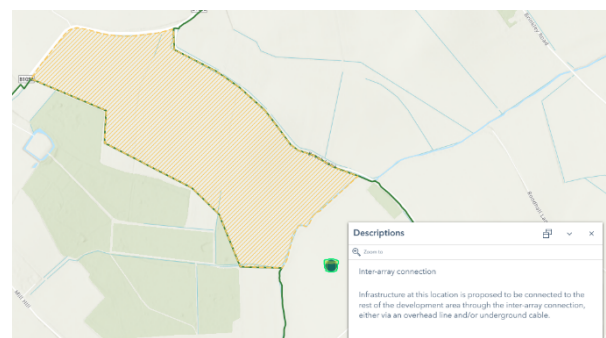
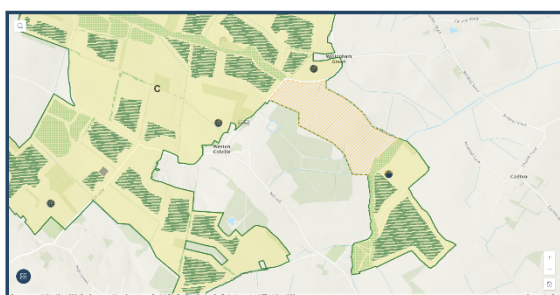
The Parish Council also expresses serious concern regarding the use of the “Rochdale Envelope” approach in the Kingsway proposal. While flexibility is a recognised principle within the NSIP framework, it has been applied here so broadly that it undermines the ability of parishioners and other consultees to comment effectively and in good time. Throughout this Stage Two consultation, key elements of the scheme have shifted - including the positioning of infrastructure, developable areas, and access routes - leaving residents drafting responses to information that is later revised or contradicted.

Several resident letters describe a moving target that thwarts meaningful comment. As one states: plans feel “vague and changeable... use of the Rochdale Envelope means siting can be changed at any stage.” With another expressing: “Factual inaccuracies and errors... if easily checked data is wrong, how can we trust the process?” Another comments that the consultation “lacks transparency, accuracy and clarity... key details deferred under Rochdale Envelope.”

This creates **confusion, erodes trust in the process, and falls short of the transparency and certainty required. The cumulative effect is to frustrate meaningful participation and falls short of the transparency and certainty envisaged by the Planning Act 2008 and associated guidance for NSIPs.**

Landowner consultation

The Parish Council is also deeply concerned by the notification of “usable land” within the project boundary without prior consultation with affected landowners. Landowners in the ‘inter-array connection’, shown in the map below, have only



recently become aware that parts of their property may be included for potential development use or temporary access during the consultation and construction phases.¹

This approach is wholly unacceptable. While representatives of Kingsway Solar Ltd acknowledged in our consultation meeting that this was “less than ideal,” we are at the time of writing unaware of whether apology or corrective action has been offered. In any event, **such conduct contravenes the spirit and intent of the legislation and processes, which require early, direct consultation with all land interests prior to or during statutory consultation.**

Proceeding in this manner risks procedural unfairness and undermines confidence in the adequacy of consultation under section 47 Planning Act 2008.

Acknowledgement of design adjustments

While Kingsway Solar Ltd has made limited adjustments to land parcel boundaries and indicative layouts since Stage One - most notably the partial removal of land east and south of West Wratting and minor offsets within Parcel C - these refinements fall substantially short of addressing the scale of harm. The relocation of panels or screening belts does not mitigate the cumulative visual, ecological, and cultural impacts that will result from industrialising a historic rural landscape.

The magnitude of change proposed remains fundamentally incompatible with the parish’s historic character, landscape and setting. No degree of planting, screening, or boundary redrawing can preserve what would be lost through the industrialisation of this deeply rural environment. The following sections set out the historical, archaeological and cultural foundations of Carlton-cum-Willingham, demonstrating that this is not simply farmland but a living historic landscape whose physical and intangible heritage would be severed by the proposal.

To understand the scale of potential harm, it is necessary to recognise the extraordinary historical depth and continuity of Carlton-cum-Willingham itself. This is not an anonymous expanse of agricultural land but one of the oldest continuously inhabited parishes in South Cambridgeshire, whose settlement pattern, field

¹ <https://kingswaysolarfarm.co.uk/the-scheme/>

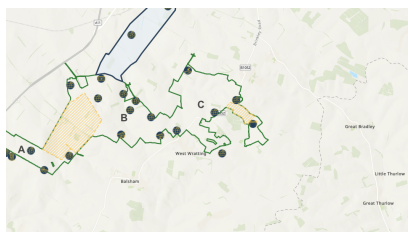
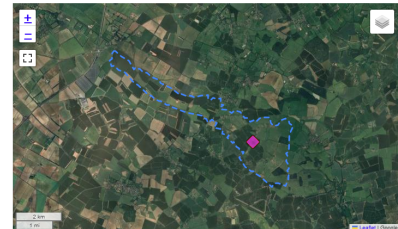
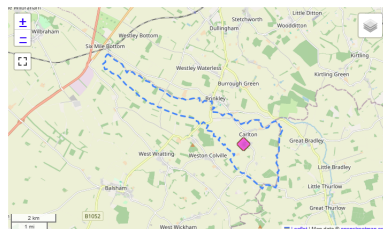
systems, and ecclesiastical landmarks have remained largely unchanged for over a millennium.

For over a thousand years, this has been more than a working landscape; it is a place of quiet reflection and spiritual continuity. The parish lies along ancient routes historically followed by travellers, monks, and pilgrims journeying between Cambridgeshire's medieval churches and shrines.

Some modern-day visitors still trace the course of the St Michael and St Mary alignment, one of Britain's oldest identified ley lines, believed to connect sites of ancient worship, healing, and devotion. Whether viewed through faith, folklore, or cultural heritage, this connection reinforces the parish's identity as part of a sacred geography that holds deep meaning for many who live in or visit the area.

What follows therefore outlines the historical, archaeological, and cultural foundations of Carlton-cum-Willingham, demonstrating that this landscape is not simply agricultural land, but a living repository of historical resonance. The proposed development would sever that connection between place, memory, and meaning - an intangible yet vital heritage that has endured for centuries.

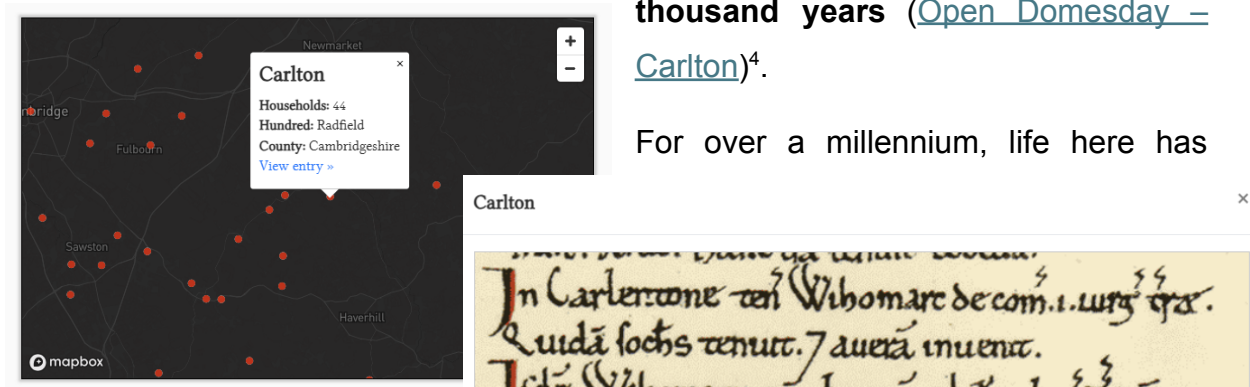
Carlton-cum-Willingham



Historical setting

The parish of Carlton-cum-Willingham is one of the oldest continuously inhabited settlements in South Cambridgeshire, its history traceable to Anglo-Saxon origins

and recorded in the [Domesday Book of 1086](#),² where it appears as *Carleton* within [Radfield Hundred](#),³ confirming its continuous occupation for more than a thousand years ([Open Domesday – Carlton](#))⁴.



For over a millennium, life here has

revolved around the rhythm of agriculture, faith, and community. **Carlton is defined by its Norman church of St Peter, a striking Grade II* landmark that has served as a spiritual and visual anchor for generations, rising above an intricate network of ancient lanes, moated sites, and medieval field systems.**



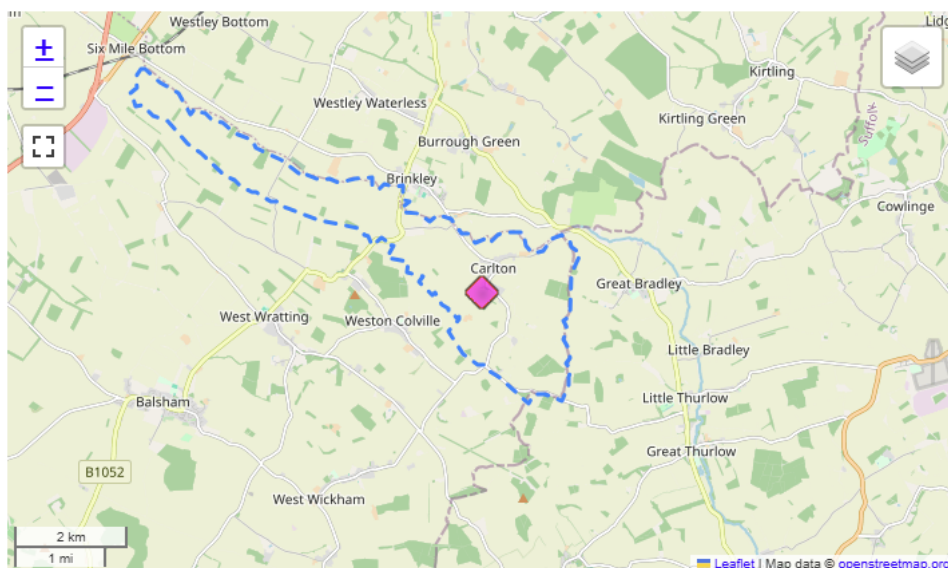
Archaeological evidence of earlier occupation, including traces of Roman and Iron Age activity, reveals that this landscape has been farmed, travelled, and worshipped upon for centuries. **Its open chalk ridges, historic hedgerows, and distinctive views form part of a cultural landscape that has changed remarkably little since enclosure, preserving a sense of time depth rare in modern Cambridgeshire.**

² <https://opendomesday.org/place/TL6453/carlton/>

³ <https://opendomesday.org/hundred/radfield/>

⁴ <https://opendomesday.org/place/TL6453/carlton/>

⁵ <https://www.raddesley.com/st-peters-carlton.html>



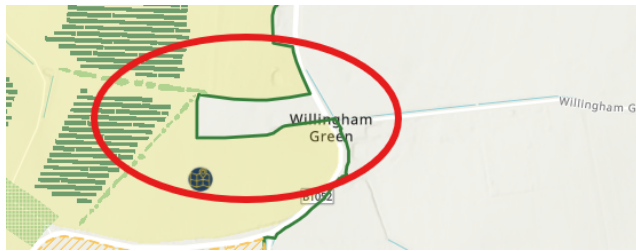
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The parish's twin settlements of Carlton and Willingham Green together form a unique example of historical continuity and dispersed village form.⁷ While Carlton developed around its medieval church and manorial holdings, Willingham Green originated as a cluster of smallholdings and cottages surrounding a traditional green, historically used for grazing and communal gatherings. Local oral history and historic mapping suggest former chapel remains in the area indicated, underscoring the hamlet's ecclesiastical and historic sensitivity.



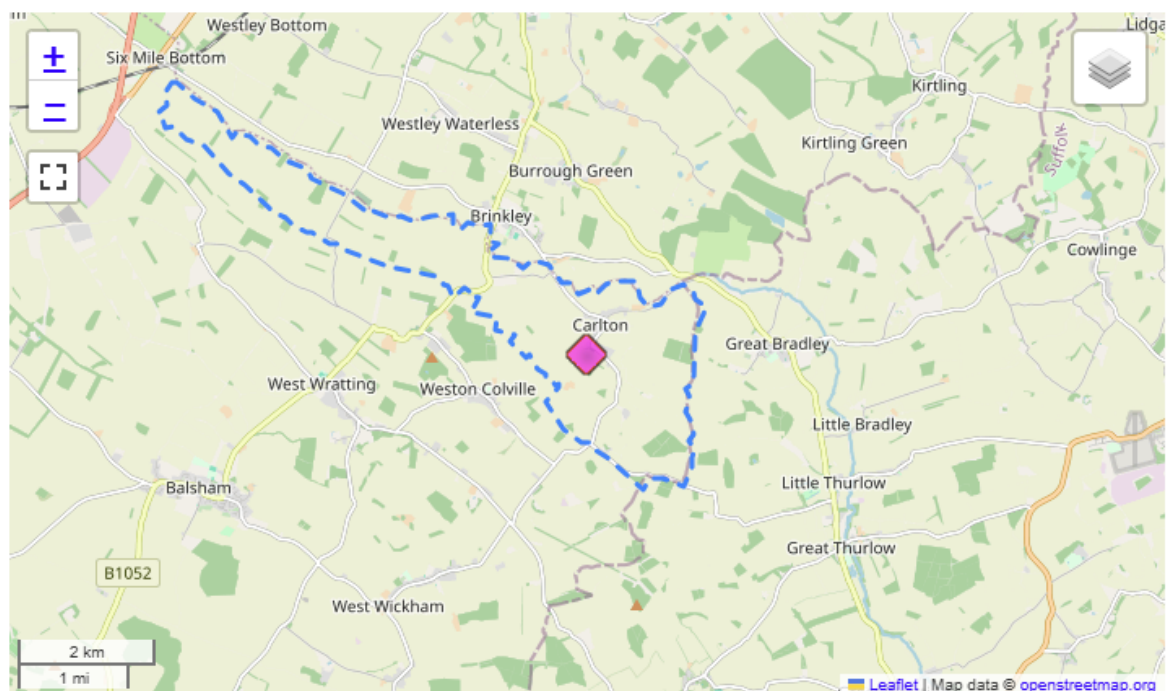
⁶ <https://historicengland.org.uk/listing/the-list/>

⁷ <https://www.genuki.org.uk/big/eng/CAM/CarltonCumWillingham>



⁸ Its very name, meaning “the settlement of Willa’s people,” reflects Saxon roots. Willingham Green forms an important part of the parish’s historic identity and contributes to the area’s distinctive sense of place.

The history of Carlton-cum-Willingham is exceptionally well-documented and easily verifiable through [multiple authoritative sources](#).⁹ Its ecclesiastical and architectural heritage is detailed in the National Heritage List for England, which lists the Church of St Peter and several unaltered eighteenth-century farmhouses and cottages within the village ([Historic England – Carlton-cum-Willingham listings](#)).



Further historical accounts and transcribed parish records are accessible through GENUKI ([GENUKI – Carlton-cum-Willingham](#)) and the Vision of Britain project

⁸ https://www.francisfrith.com/willingham-green/brinkley-1885-1901_hosm38959

⁹ <https://carltoncumwillinghampc.org.uk/history/>

([Vision of Britain – Carlton](#)), while the Cambridgeshire Historic Environment Record (CHER) and the Carlton-cum-Willingham Parish Council history archive ([Parish History](#)) provide detailed evidence of archaeological findings, manorial boundaries, and heritage assets. **Together, these sources demonstrate that the parish's origins, built form, and cultural continuity are among the best-documented of any small rural settlement in South Cambridgeshire.**

Parishioners continue to stress the parish's time-depth and the importance of its historic ways. Many highlight "historic byways, bridleways and footpaths which have existed for centuries," warning that the proposed development will damage their character forever. Others express concern that Willingham Green's open approaches and sightlines, including views northwards towards the chalk ridge and east to the historic byways leading to Weston Green, would be industrialised and diminished beyond recognition. Another notes Carlton's heritage sensitivity and fears "visual intrusion" on listed buildings and views to the church; the scale would "industrialise views...".

Life today

Today, Carlton-cum-Willingham remains a small, close-knit rural community whose identity is inseparable from its setting. The village continues to embody a traditional pattern of life - family farms, equestrian activity, smallholdings, and the quiet continuity of local craftsmanship **and stewardship of the land**. Residents, several of whom have moved from towns and cities for their health and wellbeing, value not only the peace and remoteness of the parish but also the collective memory embedded in its buildings, byways, and churchyard, where the same surnames appear across centuries of headstones. This living continuity of place and people gives Carlton-cum-Willingham a profound cultural resonance that extends far beyond its modest population.

The parish and neighbouring communities occupy one of the most archaeologically and environmentally sensitive areas of South Cambridgeshire. Willingham Green settlement lies close to the Icknield Way, one of Britain's oldest trackways and a route of national archaeological significance, whose ancient line continues to shape the pattern of lanes, byways, and farm boundaries in the surrounding fields. The proximity of Lower Wood, a remnant of ancient semi-natural woodland, indicates

sustained human activity dating back centuries. These features, together with the undisturbed field systems and historic rights of way, represent a landscape of rare integrity - one that retains its original relationship between habitation, agriculture, and the natural environment.

Any large-scale industrial development in such a landscape would not merely alter the view; it would dismantle a heritage-based way of life that connects the present generation directly to over a thousand years of recorded history.

Examples of, and links to, dwelling houses and landmarks

Carlton Green:

[Finchley Gate Farm](#); [Woodman House \(167\)](#); [Rood Hall](#); [Woodmans](#); [169 \(Ginty's\)](#); [170](#); [Fields View Cottage \(171\)](#); [Apple Tree Cottage \(172\)](#); [Lopham's Hall](#); [Norney Farm](#);

Carlton:

[Park Cottage](#); [Oakland](#); [Church Farm](#); [South Barn](#); [Carl's Barn](#); [St Peter's Church](#); [War Memorial](#); [The Old Rectory](#); [Cocksedge Farm](#); [Pond Cottage](#); [Almancil House](#); [Long House](#); [The Square House](#); [Church Barn](#); [Field Cottage](#); [Madison House](#); [Orchard House](#); [Walnut Trees](#); [Port-na-Craig](#); [Swedish Houses](#); [Odums](#); [Talland](#); [Cyrynti](#); [Hawkwind Stud](#); [The Old School House](#)

Carlton Hill - Brinkley Road

[Corner Cottage](#); [The Gables](#); [Four Winds](#); [Poppy Barn](#); [Hillcroft](#); [Hillview](#); [Oak House](#); [Hill House](#); [Rose Cottage](#); [Chimneys](#); [Crackers](#); [Woodland View](#); [The Old Hall](#); [Kingsfield](#); [Little Low Cottages](#); [The Old Rose & Crown](#); [Boundary Cottage](#)

Carlton Hill - Acre Road

[173-174](#); [Paverley](#); [Breydon](#); [Shantah](#); [High House](#); [Acre Cottage](#); [Carlton House](#); [Beech Lodge](#); [1, 2, 3 & 4, Acre Road](#); [1&2 Hall Farm Cottages](#); [Hall Farm](#)

Willingham Green

[Willingham House](#); [Indiana](#); [The Bungalow](#); [Raasay](#); [Woolmer Cottage](#); [1&2 Willingham Green Road](#); [Lambra](#); [Restormel](#); [Stone Cottage](#); [Christmas Cottage](#); [Horseshoe Cottage](#); [Cromwell Cottage](#)

Current dwelling-houses illustrate both continuity of occupation and the preservation of the parish's built character. While formal heritage listing and parish records confirm a number of such examples, many properties in Carlton-cum-Willingham and its immediate environs show little alteration since the late nineteenth or early twentieth century, some earlier still.

A submission highlights views from the churchyard over fields long worked by local families, warning that a "sea of panels" would constitute serious setting harm to a place of remembrance.

Some of these properties, the heart of the parish, are documented on Historic England's National Heritage List for England and Cambridgeshire Historic Environment Record (CHER). **Their unchanged fabric and form across more than a century reinforce the argument that Carlton-cum-Willingham is an exceptionally well-preserved rural settlement, where continuity of scale, material, and pattern is central to its heritage value.**

While there are further examples, these buildings collectively demonstrate exceptional architectural continuity in a parish where both the scale and fabric of dwellings have remained largely unchanged. They show that Carlton-cum-Willingham has evolved through preservation, not replacement, reflecting a sustained respect for traditional materials, proportions, and setting. **This historical stability underscores how incongruous the introduction of industrial-scale solar infrastructure would be within a village that has resisted substantial physical alteration for generations.**

Disproportionate Impact on Local Residents and Landscape Character

Residents consistently describe the scheme as industrial in scale and out of character with a small, historic parish. In their response, a resident points to the "industrialisation of rural land" and notes there are "many brownfield... sites" better suited to solar. From another: "This vast industrialisation of rural land is entirely out of proportion... panels, fencing, cameras, and substations will dominate." And another rightly states: "A 3,700-acre industrial area in what is now a beautiful rural landscape... **no mitigations will overcome this.**"

The proposed Developable Area C appears to sit within a few hundred metres of residential properties along Willingham Green Road and Carlton Green, despite the availability of far more remote land parcels within the wider site. This siting prioritises commercial convenience over proper planning logic and **fails to respect the small-scale, ridge-line character of Carlton-cum-Willingham and adjacent parishes.**

The proposal would **introduce industrial-scale infrastructure into a distinctive medieval landscape of open fields, lanes, and church-centred settlement that has remained largely unchanged for centuries.**

Harm to Heritage and Archaeology

We believe that archaeological evaluation near St Peter's Church, Carlton (Grade II*) would reveal medieval and possibly earlier remains consistent with the known shrunken village and ecclesiastical precinct. In any event, **Parcel C lies within an area of high archaeological sensitivity.**

Under law, assets of this significance must be preserved in situ wherever feasible. Continuing to include Parcel C within the developable area, so close to the historic village core, would **breach both the precautionary principle and established national policy on heritage conservation.**

Agricultural land & food security

Residents repeatedly stress that the land affected by the proposal comprises high-quality arable fields that have been productively farmed for generations. The permanent loss of such land undermines local and national food security at a time when resilience and domestic production are vital. The notion that the land can simply be “returned to agriculture” after forty years is widely regarded as unrealistic: soil structure, drainage, and fertility would deteriorate irreversibly through compaction, shade, and contamination. Parishioners advocate a more sustainable national strategy - prioritising solar generation on rooftops, brownfield land, and commercial car parks - so that renewable energy is achieved without sacrificing the countryside that sustains both food and community life.

Multiple letters from parishioners emphasise productive farmland and national food resilience. Residents describe the site as “high-quality, productive farmland,” with its

loss “inappropriate and unnecessary.” Another adds: “We do not have food security as it is... taking precious, good-quality farmland is not to the benefit of this locality or the country long term.” In particular, the parcel at the heart of Carlton, Weston Green and Willingham Green comprises high-grade agricultural land, with only limited flood affectation - materially smaller than the developer appears to assume.

BMV classification and evidence base.

Residents also point out that well-drained chalk loams under continuous arable rotation already support high yields, with existing field drainage/irrigation in place; removing these fields from production “is madness in today’s unstable world,” as one letter puts it.

Much of the land within and around Parcel C comprises Best and Most Versatile (BMV) agricultural land (Grades 1–3a). Natural England’s agricultural land classification mapping indicates well-drained chalk loams under continuous arable rotation, with existing field drainage/irrigation infrastructure that supports high productivity. Development on BMV land is inconsistent with national food security objectives when viable alternatives exist on brownfield, rooftop and lower-grade land. **The Council therefore asks Kingsway to publish a grade-by-grade (1/2/3a) breakdown of affected hectares and to revisit site selection accordingly.**

BESS: Unacceptable Risk to the Principal Chalk Aquifer

The entirety of the proposed site, including Parcel C bordering Carlton village, lies above a Principal Aquifer within Source Protection Zones (SPZ 1 and 2) serving the public drinking-water supply. **The inclusion of a large-scale BESS in this location is indefensible.**

A single battery fire could generate tens of thousands of litres of toxic, contaminated fire-water. The Environment Agency’s Groundwater Protection Policy requires absolute containment in such zones; yet Kingsway’s Preliminary Environmental Information Report (PEIR) provided no engineered solution capable of guaranteeing this. **A containment failure would result in irreversible groundwater pollution affecting hundreds of thousands of residents across Cambridgeshire.**

The responses reflect these concerns and there is deep anxiety about battery fires, fire-water and the chalk aquifer/SPZs. A resident warns BESS incidents have led to

“toxic smoke emissions” and asks who pays for emergency response. Another states: “Battery systems have and do catch fire... dousing water becomes contaminated... seep into the Chalk Aquifers supplying drinking water.” One states, soberingly: **“There cannot be any guarantees this will never happen... the potential risks would be catastrophic.”**

The Parish Council notes with concern that the Kingsway Battery Energy Storage System (BESS) appears to meet or exceed thresholds that would ordinarily require Hazardous Substances Consent (HSC) under the Planning (Hazardous Substances) Regulations 2015. We therefore expect East Cambridgeshire District Council, as the relevant authority, to confirm that a formal HSC application will be required prior to any DCO submission. This mechanism provides statutory scrutiny of explosion, fire, and toxic release risks that cannot be achieved through a Battery Fire Safety Management Plan alone. The Parish further requests that the Councils and Fire and Rescue Service be supported by an independent Lithium-Ion Battery Safety Specialist, ensuring that all emergency planning, containment, and pollution prevention measures are reviewed by suitably qualified experts. Lessons from the Sunnica and Cleve Hill cases demonstrate that reliance on deferred or developer-authored fire plans leaves communities exposed to unacceptable residual risks. **A transparent HSC process would provide the independent oversight, enforceability, and public confidence currently absent from the Kingsway proposal.**

The parish also notes the River Stour headwaters arise in the immediate landscape, with downstream abstraction for public supply. Any failure of **containment during construction or a BESS incident** risks mobilising pollutants to surface water as well as the Principal Chalk aquifer.

Public Rights of Way and access

Parishioners consistently stress that everyday walking routes are central to life here, both for recreation and as links between villages. Much-used circuits include Brook Lane (the ancient green lane/byway), the fords, Willingham Green, and the Cocksedge Farm–Weston Green path, described by one resident as a “wonderful, rolling, and unspoilt” route. Community submissions single out the **Icknield Way National Trail** and Brook Lane as especially sensitive, warning that proposals to

resurface Brook Lane for construction traffic and to run fencing and panels tight against the Cocksedge–Weston Green link would transform open, panoramic views into industrial corridors. Residents characterise resurfacing a flood-prone, narrow, flora-rich track, home to scarce species such as oxslips, as “desecration,” and emphasise that “walking between panels rather than fields is not the same.”

The indicative Zone C layout would place solar arrays and security fencing directly along these historic routes, enclosing walkers between tall boundaries and erasing the freedom and beauty that define the rolling chalk landscape. These paths are not only for exercise; they are cultural and ecological corridors that have endured for centuries, supporting wellbeing, social connection and wildlife movement across generations. The Parish notes that several footpaths and byways appear at risk of closure or diversion during construction or operation, yet consultation materials provide no definitive routes, timescales, or binding reinstatement assurances. The Outline PRow Management Plan is insufficient without local input, legal safeguards, and clarity on whether temporary powers or compulsory acquisition are sought where inter-array corridors cross land without consent. Accordingly, the Parish requests: ground-level cross-sections and realistic photomontages from named PRow; confirmation of **no operational closures**; and binding DCO obligations for protection, reinstatement, and aftercare of all affected routes.

Biodiversity and Landscape Ecology

Residents across the parish repeatedly express deep concern that the proposed fencing, haul roads, and extensive groundworks would fragment the long-established wildlife corridors that sustain the area’s ecological balance. Submissions identify likely impacts on birds, bats, deer, and pollinators, describing the developer’s proposed mitigation as “hollow” and unworkable at this industrial scale. Parishioners mourn the probable loss of the distinctive local soundscape, fearing that the calls of neighbourhood birds will be “drowned by the buzzing of batteries and pylons.” Others highlight the disruption of hedgerows, wildflowers, and ancient woodland that have evolved undisturbed for centuries, forming a landscape of rare ecological continuity.

Lower Wood and its surrounding fields are of particular concern. This area supports an abundance of wildlife, including cuckoos, willow warblers, hares, deer, and other species that depend on the meadows, copses, and hedgerows for shelter and

movement. Verges along ancient tracks such as Brook Lane are home to scarce wildflowers, notably oxslips, while mature black poplars grow near the ford—an endangered species thriving in the unique wetland conditions of this locality. These habitats collectively represent the ecological fabric of the parish, interwoven with the historic landscape and maintained through generations of careful stewardship. Any attempt to widen or repurpose these routes for construction traffic would irreparably damage these delicate ecosystems.

Taken together, the evidence provided by residents and the absence of credible, site-specific ecological safeguards indicate that the Kingsway proposal would result in irreversible ecological fragmentation and the permanent loss of a living landscape that has remained biologically rich and visually coherent for centuries. Security fencing would block the natural movement of mammals such as deer, hares, and badgers; construction noise and lighting would displace birds and nocturnal species; and overhead cables would heighten collision risks for raptors such as red kites. The cumulative effect would be a measurable decline in biodiversity that no mitigation can realistically replace. Without complete, transparent ecological surveys and locally informed protection measures, the proposal falls far short of the regulatory standards and principles of environmental stewardship expected under national policy and Natural England’s standing advice.

Traffic, safety & construction disturbance

Road safety continues to be a critical issue for the local area due to the frequency of accidents on the rural highways that run throughout the parish of Carlton-cum-Willingham. The large volume of construction traffic to facilitate the Kingsway Solar project would be fundamentally at odds with the nature and layout of the roads of the surrounding area, including single track lanes, with no pavement, frequented by sharp bends and poor lines of sight. The inherent dangers in this proposal are further exacerbated due to the large network of regularly frequented public footpaths and bridleways which intersect the parish, including the Icknield Way, a National Trail used by walkers, stretching from Norfolk to Wiltshire. Furthermore, equestrian businesses form a key part of the local economy, with a number of commercial stables located in and around Willingham Green, in immediate proximity to parcel C, where the transit of large construction vehicles

would regularly encounter riders on the highways and byways, proving an increased risk to vulnerable road users.

Submissions emphasise that these lanes are single-track, pavement-free, with sharp bends and poor sightlines. Residents highlight the unsuitability of the narrow rural lanes proposed for construction traffic, particularly where these coincide with public footpaths or bridleways. Brook Lane, cited as a potential access route, is a single-track byway prone to flooding and bordered by fragile flora. Its conversion into a haul road for heavy vehicles would be entirely inappropriate. The surrounding roads lack pavements, have limited sightlines, and are routinely used by pedestrians, dog-walkers, and equestrians. Any significant increase in construction traffic would create unacceptable safety risks for all road users and cause damage to verges and heritage boundaries. **This would transform quiet rural lanes into industrial corridors, contrary to the principles of proportionality and rural protection set out in national planning policy.**

There is strong opposition to using narrow rural lanes for heavy construction traffic. Notable points from responses: “400 heavy truckloads a day... will transform our quiet lanes into industrial corridors.” Residents whose properties are situated along proposed construction routes fear damage and risk: “Local roads are not designed... our listed house is close to the road and vulnerable to vibration.” One questioner claims that the site is “close to the A11/A14” given the 5–10 miles of unsuitable rural roads in between.

Noise, lighting & loss of dark skies

Amenity concerns include operational hum, alarms, and intrusive lighting. As one resident wrote, “Dark skies are part of life here... security lighting... will be enormous.” Another observed that “people near large solar schemes report a constant background hum... it is not sufficient to assume no one beyond 300m is affected.” Residents describe regular meteor-shower watching and visible satellite passes; they say security floodlighting would erase this “everyday dark-sky experience” that defines local quality of life.

These comments reflect a deep anxiety about the erosion of tranquillity that defines Carlton-cum-Willingham and its neighbouring hamlets. The area currently benefits

from exceptionally low light pollution, allowing clear night skies and contributing to residents' wellbeing and sense of place. The introduction of security floodlighting, motion sensors, and continuous operational noise from inverters, fans, and battery cooling systems would fundamentally alter that character.

National policy requires adverse noise and lighting impacts on health and amenity to be mitigated. In the absence of a lighting strategy, cumulative baseline assessment and operational noise contouring (including low-frequency profiles), the effects cannot be judged acceptable. A Dark Skies Lighting Strategy and enforceable operational noise limits at receptors are prerequisites, not post-consent details. In this context, Kingsway's failure to provide detailed lighting plans, noise contour mapping, or cumulative assessment against the baseline conditions makes it impossible to conclude that these effects would be acceptable.

Testimonies from residents emphasise the parish's exceptional tranquillity as a defining characteristic of daily life. The introduction of construction traffic, machinery, alarms, and operational hum from inverters and cooling systems would shatter this peace. Continuous or intermittent noise - particularly at night - would interfere with rest, concentration, and overall wellbeing. Equally damaging would be the intrusion of artificial light into a landscape presently defined by its dark, starlit skies.

The combination of mechanical sound and glare would destroy the calm that draws people to the area and has supported generations of residents, artists, and those seeking a low-stimulus environment for health or neurodivergent needs.

The permanent loss of dark skies would represent not only a visual intrusion but a profound cultural and environmental harm to a parish long valued for its peace and remoteness.

Property Value, Wellbeing and Mental Health

Residents link the anticipated loss of amenity to both mental strain and reduced property marketability. A submission warns that "our ability to work from home may be compromised by noise," while another cautions that "the cumulative impact on mental health and wellbeing cannot be overstated." A resident describes "sleepless nights" caused by anxiety over the scheme and references national evidence on the

restorative value of access to green space. These concerns are echoed across the parish, where peace, dark skies, and open countryside are not luxuries but essential features of daily life and personal equilibrium.

Carlton-cum-Willingham provides a sanctuary for many residents - including those who are neurodivergent - who have deliberately chosen this setting for its tranquillity, predictable rhythms, and sensory stability. For some, the ability to function, work, and contribute meaningfully to society depends upon the absence of constant noise, light, and disruption. The intrusion of industrial infrastructure, operational hum, and security lighting would directly undermine this fragile balance, risking profound and lasting harm to mental health, focus, and wellbeing.

Research consistently confirms that regular access to nature and quiet rural environments promotes mental health and reduces anxiety, while intrusive development and environmental degradation have the opposite effect. The National Planning Policy Framework recognises the need to safeguard communities from noise and light pollution that affect health and quality of life, and the Equality Act 2010 imposes a public duty to consider the disproportionate impact of policy decisions on protected groups, including disabled and neurodivergent individuals.

Parishioners link the proposed development to a predicted decline in property desirability, value, and local investment. Beyond economics, residents describe profound anxiety about the industrialisation of their surroundings and the anticipated effect on quality of life. Many have settled in the parish specifically for its stability, quiet, and natural environment, which support both mental health and social cohesion. The introduction of large-scale solar infrastructure would disrupt these conditions, compromising the wellbeing of those who rely on calm, predictable environments to function and contribute fully to society. These human impacts - though less quantifiable than technical assessments - are among the most significant and enduring consequences of the proposal.

Parishioners ask why, if imposed despite local objection, there is no tangible local benefit (e.g., discounted local tariff or community energy share), and how loss of value for properties overlooking operational equipment would be addressed.

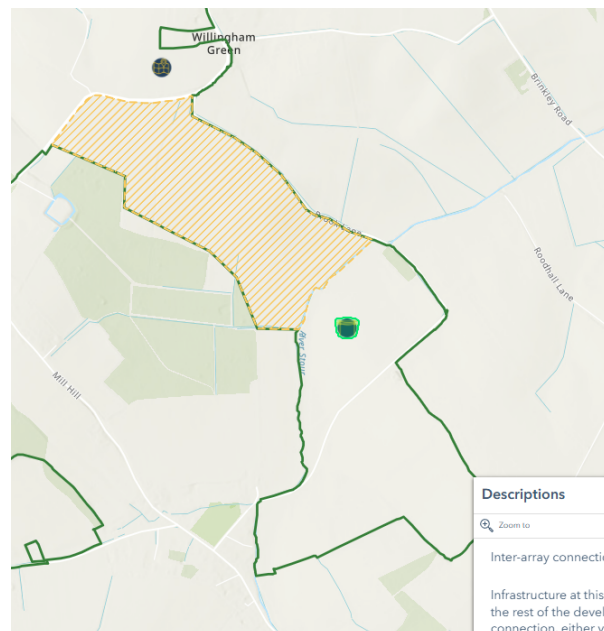
For many in Carlton-cum-Willingham, the proposed solar and battery installation would destroy not merely the view, but the very conditions that make life liveable and

meaningful. **No mitigation proposed by Kingsway can offset the psychological, social, and economic harm that would follow the industrialisation of this deeply connected rural community.**

Requested Actions

Accordingly, the Parish Council requests that Kingsway Solar Ltd:

1. **Withdraw Parcel C from the developable area** (permanently, or at minimum pending full archaeological trenching, hydrogeological testing, and heritage setting assessment agreed with the County Archaeologist and Historic England). Or, specifically, the inter-array and land parcel connected here, quite literally dividing the parish, to be permanently withdrawn:



2. **Remove or relocate the BESS away from SPZ1/2 and the Principal Chalk Aquifer**, or alternatively submit a detailed Hazardous Substances Consent (HSC) application under the Planning (Hazardous Substances) Regulations 2015, supported by independent expert review and confirmation from the Environment Agency. We request written confirmation that HSC falls within scope for the proposed BESS and that a formal HSC application (with public consultation) will be required prior to DCO submission.
3. **Fix the layout envelope and re-consult:** publish a stable, scaled layout (panels, fencing, BESS, compounds, access) and commit to a short targeted

re-consultation so residents are not commenting on moving parameters under the Rochdale Envelope.

4. **Requested disclosure:** a grade-by-grade (1/2/3a) hectare breakdown using Natural England mapping and site-specific surveys, with an alternatives assessment that avoids BMV wherever practicable.
5. **Publish all baseline data and QA:** release survey dates, raw datasets (GIS/shapefiles), borehole logs, permeability tests, acoustic measurement points, lighting baselines, and ecology survey logs - plus a correction note addressing mapping/text errors flagged by residents.
6. **Public Rights of Way protections:**
 - a. Confirm no closures or diversions of key routes (e.g., Cocksedge Farm–Weston Green link) during operation and set out any construction-phase diversions with durations, signage, and safe alternatives;
 - b. Provide ground-level cross-sections and photomontages from named PRoW;
 - c. Secure PRoW reinstatement and aftercare as a binding DCO requirement.
7. **Requested disclosure:** ground-level cross-sections and photomontages from named PRoW; confirmation of no operational closures; binding DCO obligations for reinstatement and aftercare.
8. **Legally binding buffers:** commit to minimum stand-off distances from parish boundaries, residential curtilages, heritage assets, PRoW and veteran hedgerows - with the buffers secured as DCO requirements (not discretionary “best endeavours”). We request a 1km buffer from the Norman church of St Peter.
9. **Traffic and haul route certainty:** publish a draft Construction Traffic Management Plan now (not post-consent) with confirmed haul routes that avoid narrow lanes, greens/green lanes and PRoW; include HGV caps by hour/day, school-bus hour embargoes, freight management, and road condition surveys with repair bonds.
10. **Noise & dark skies:** publish a full and accessible operational noise contour map (including low-frequency profiles) and a Dark Skies Lighting Strategy (zero up-lighting, curfews, lux limits at receptors, PIR logic); set enforceable

noise limits at nearest dwellings and commit to independent post-commissioning compliance testing.

11. **Health, Equality & Neurodiversity Impacts:** provide a proportionate Health Impact Assessment and an Equality Impact Assessment that explicitly considers neurodivergent residents who depend on low-stimulus environments; specify design and operational adjustments (e.g., lighting curfews, acoustic screens, no tonal alarms) to avoid disproportionate impacts.
12. **Aquifer/groundwater method statements:** publish a construction Groundwater Protection Method Statement covering trenching, dewatering, refuelling, spill response, soils management, and post-event monitoring -reviewed by the EA and Cambridge Water.
13. **Independent peer reviews:** publish independent reviews (names, firms, PI insurance) for hydrology/groundwater, BESS fire and safety modelling, transport, noise, lighting, and ecology - together with a “red-flag log” and close-out actions.
14. **Heritage mitigation hierarchy:** confirm that where significant below-ground remains or setting harm are identified, the default will be avoidance/preservation in situ (layout removal), with excavation only as a last resort and under a published Written Scheme of Investigation.
15. **Land control clarity & landowner engagement:** issue formal written notifications to all parcels shown within order limits, identify where voluntary agreements are absent, and state whether temporary possession or compulsory acquisition powers are being sought - plot by plot.
16. **Decommissioning & restoration security:** commit to a ring-fenced, index-linked financial bond (or equivalent instrument) sufficient to remove panels, cabling, foundations and contaminated soils, restore soils to agricultural quality, and reinstate PRow and hedgerows - secured as a DCO requirement.
17. **Emergency response & cost-recovery:** publish a BESS incident plan agreed in principle with Cambs Fire & Rescue, including water supply/containment logistics, cordon modelling, community notification, and confirmation that all incident and training costs are developer-funded (not borne by local services). Ensure that the Battery Fire Safety Management Plan (BFSPM) is reviewed and endorsed by an independent lithium-ion

battery specialist and Cambs Fire and Rescue, with a clear funding mechanism for training, incident response, and post-incident remediation.

18. **Genuine alternatives & need:** provide a transparent summary of the alternatives assessment (rooftops, car parks, brownfield, and less sensitive greenfield layouts) and explain why smaller, distributed options such as rooftop, car-park, and brownfield installations were rejected - before submitting any DCO.
19. **Construction environmental controls:** provide an outline CEMP now (not post-consent) covering dust, vibration at sensitive receptors and listed buildings close to carriageways, hours of work, and monitoring/enforcement triggers.
20. **Binding community liaison:** establish a parish-level liaison group with minutes published, a named technical contact, and a commitment to respond to evidenced errors within 10 working days.
21. Preserve the character and accessibility of Brook Lane and the Icknield Way by excluding adjacent fields from solar development and prohibiting any use of these routes for construction or haulage traffic. Implement protective designations for Lower Wood, its black poplars, and associated habitats.
22. **Ownership & accountability:** Identify the legal entity that will hold the DCO and remain responsible for environmental compliance, monitoring, remediation and decommissioning for the project's life, including evidence of standing and insurance.
23. **Evidence annex:** Publish an evidence log annexing raw survey dates, community submissions and a schedule of corrections to mapping/text errors identified by residents, to enable transparent audit.

The proposed Kingsway Solar development seeks to install solar panels and large-scale battery storage across 1,246 hectares (3,079 acres) of productive farmland in South East Cambridgeshire. The affected area spans the villages of Balsham, West Wrating, Weston Colville, Willingham Green, Carlton, Brinkley, and Six Mile Bottom. In addition, a significant 15-kilometre connection corridor is planned to link the site to Burwell. With a capacity exceeding 500 megawatts, this would be among the largest solar installation in the European Union. The industrial scale of this project - covering a land area larger than Heathrow Airport - would encircle our

villages and irreversibly alter the landscape, character, and heritage of this much-cherished part of the English countryside.

The Kingsway Solar proposal, as currently presented, fails to demonstrate that it can be delivered safely, sustainably, or in accordance with national policy. The environmental, archaeological, and community risks are substantial, and the evidence base incomplete.

Until these deficiencies are resolved - and independent experts confirm the site's suitability - **Carlton-cum-Willingham Parish Council cannot support any part of this development across parcels A, B, or C.**

We therefore urge Kingsway Solar Ltd to reconsider its site layout and scope before proceeding to a DCO submission.

Yours faithfully,

Kathryn Jones

Chair, Carlton-cum-Willingham Parish Council