



Historic England

Direct Dial:

Our Ref: PL00797700

David Vernon
Head of NSIP Projects
Downing Renewable Developments

29 October 2025

Dear Mr Vernon,

Kingsway Solar Farm - Statutory Consultation under Section 42 of the Planning Act 2008

Planning Inspectorate reference: EN010165

Thank you for your letter of 17 September 2025 consulting Historic England on the Preliminary Environmental Information Report (PEIR) stage of the Kingsway Solar Farm application.

Historic England is the Government's lead advisor on the historic environment; we are a non-departmental public body sponsored by, and reporting to, the Secretary of State for Culture, Media and Sport. For the purposes of Section 42 of the Planning Act 2008 and Regulation 11 of Infrastructure Planning (Environmental Impact Assessment) Regulations 2009, we are a statutory a consultee.

Historic England Advice

Our advice and comments on the PEIR are set out below, arranged by chapter. Unless specifically identified as referring to the PEIR Appendices, all references to section, paragraph, figure and table numbers in the advice below relate to the main chapters of the PEIR.

Historic England's advice relates to highly designated heritage assets, in this case scheduled monuments, grade I- and grade II*-listed buildings, and conservation areas. We have therefore been highly selective about the parts of the PEIR with which we have engaged. Advice on non-designated heritage assets and grade II-listed buildings should be sought from the historic environment teams at Greater Cambridge Shared Planning and East Cambridge District Council as appropriate.



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As these proposals represent a Nationally Significant Infrastructure Project (NSIP) they will be dealt with through the Development Consent Order regime, and the requirements of the relevant National Policy Statements (NPS) will apply. In this case the relevant NPSs are EN-1 (the Overarching NPS for energy), EN-3, and EN-5.

In its discussion of impacts on the historic environment, EN-1 adapts from the National Planning Policy Framework (NPPF) the widely understood conceptual framework and terminology of significance, harm, and public benefit. Whilst we understand that the impacts of the proposals will be described in the Environmental Statement (ES) accompanying the DCO application using the standardised terminology for Environmental Impact Assessment (EIA), 'significance', 'harm', 'public benefit' remain key underlying terms. We have therefore used these terms in the advice and comments set out below.

Chapter 3: The Scheme

3.3 The Rochdale Envelope Whilst Historic England accept the need at this stage for a flexible approach to the scheme design, and whilst we appreciate the safeguards built into the use of the Rochdale Envelope (which mandates a consideration of the 'worst case scenario'), we have some concerns about the way in which this approach creates uncertainty over the details of the inter-array and grid connections.

It has yet to be determined whether the inter-array connections will be overhead or underground; whilst the wires for connection to the grid are proposed to be mostly carried overhead on pylons there are areas, also yet to be fully determined, where these too will be underground.

One of our main concerns about this scheme (see below) is the potential impact on Fleam Dyke and Devil's Ditch, both linear scheduled monuments. Fleam Dyke runs across the inter-array connection corridor between developable areas A and B; the Devil's Ditch is crossed by the grid connection corridor south of Burwell.

How much harm would be caused to the significance of these designated heritage assets by the final scheme depends on the chosen form of the inter-array and grid connections. On the one hand, excavation of either of these earthworks to lay underground cables across them would cause a very high level of harm to their significance through direct physical intervention; pushing or drilling cables beneath the



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earthworks would also represent a significant risk to their physical integrity, and is likely to cause harm to significance. On the other, taking the cables over them on pylons or poles would also cause some harm to their significance through impact to their setting.

More generally, where overhead lines are firmly proposed, their proximity to the scheduled monuments would cause harm to significance through impact to setting. This is particularly the case with respect to the Devil's Ditch, where it is proposed to run overhead lines parallel to it for a considerable distance between the Burwell Road (B1102) and the A14. This new line of pylons would be highly visible in views from the long-distance footpath which runs along the top of the monument (please see section **8.4.8** below for a more detailed discussion of the effects).

All the present possible options for both the grid connection corridor and the inter-array connections would be of serious concern to Historic England and are likely to result in harm to the significance of the scheduled monuments involved. The degree and level of harm would depend upon the details of the approach, but would represent a significant effect in EIA terms.

These potential impacts are key aspects of the scheme's likely environmental effects. Unlike the precise specifications of the PV panels themselves, or their associated infrastructure, which may be affected by technological developments, we consider that the routes and types of connections will be determined according to stable and well-understood constraints, especially with respect to designated heritage assets. These constraints relate to the particular and well-understood qualities of the heritage assets involved, and are in addition to the clear overarching principles established by the Holford and Horlock rules.

We therefore strongly encourage you to develop this aspect of the scheme with much more certainty before submitting an application for a Development Consent Order (DCO). We recommend that, in doing so, you explicitly rule out any work which would have a direct physical impact on either Fleam Dyke or the Devil's Ditch, by specifying that power-line connections are carried over these features as overhead wires, or routed through existing gaps in the monuments.

It remains unclear if there are any opportunities to reduce the likely impact of the proposals upon the scheduled monuments by consolidating existing cable routes, or by removing some existing elements that detract from their setting. Combining existing and new infrastructure in the same location could also potentially reduce significant



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effects, and we consider that a proactive approach to reducing existing detracting elements could represent a public benefit of the scheme.

We are aware of other nearby schemes - Long Barrow Solar, for instance, (<https://www.longbarrowsolarfarm.co.uk/>) - that have successfully developed an option to bring cables through the Devil's Ditch monument. We would welcome further consideration of the possibilities for co-locating cables to reduce impacts on the designated heritage assets in this area, or of replicating these established approaches. We note that such other schemes would need to be considered in relation to the assessment of cumulative impact (see section **8.2.15**, below).

It is also worth noting here that at least some of the possible proposed works relating to the grid and inter-array connections would require Scheduled Monument Consent in addition to planning permission. These are matters that will need to be directly accounted for in any DCO application, and would also need to be explicitly discussed with Historic England prior to any DCO application being submitted.

Given the implications for the scheduled monuments noted above and the potential additional consent requirements, we strongly recommend that you enter into dialogue with Historic England as soon as practical, to discuss the requirements and possibilities.

Chapter 4: Alternatives and Design Evolution

4.3.37 This section lists environmental aspects considered during site selection and design evolution. It states that there are only three scheduled monuments within the site (Devil's Ditch, Reach to Woodditton (list entry number 1003262), the long barrow 410m southeast of Partridge Hall Farm (list entry number 1020842), and one of the five bowl barrows 270m of Hare Park Stud (list entry number 1016818)).

This is incorrect: as is correctly stated elsewhere in the PEIR, part of Fleam Dyke (list entry number 1006931) runs across the site in the connection corridor between developable areas A and B, and this should be explicitly and consistently acknowledged. The bowl barrow 1080m northeast of Worsted Lodge Farm, part of a dispersed round barrow cemetery in Charterhouse Plantation (list entry 1019989) is also just within developable area A, and should also be acknowledged here.

4.4.15 As above, we recommend that the type of inter-array connection is determined



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as soon as possible so that the impact on the significance of designated heritage assets (in particular the scheduled monuments of Fleam Dyke and Devil's Ditch) can be assessed, and the design further refined if necessary.

Where overhead lines are proposed, the chosen design of pylon or pole would have a bearing on their visual impact, and would determine to some extent the effect on the settings of designated heritage assets within both the site and the wider study area. These, too, should be specified before the application for a DCO is made, so that their impact can be assessed.

As noted above, we recommend that you consider opportunities to reduce the impact upon the scheduled monuments involved by combining existing and new infrastructure in the same space, consolidating new with existing infrastructure, or by seeking to remove some existing elements of the scheme that detract from the setting of these important designated assets. We have also highlighted that co-locating cables with other schemes would also potentially reduce cumulative impacts.

Chapter 7: Landscape and Visual Amenity

This chapter is not a full Landscape and Visual Impact Assessment (LVIA), but presents a preliminary study in order to establish a baseline. A full LVIA will be provided as part of the Environmental Statement (ES) supporting the application for a DCO.

We welcome the provision of a full LVIA, but explicitly recommend that a number of viewpoints of specific relevance to cultural heritage are included as part of the assessment - to be determined in collaboration with the authors of the ES chapter on the historic environment. Such heritage-specific viewpoints will need to be bespoke and relevant to the assets involved, and the information gained will need to be integrated into the heritage chapters of the ES.

The viewpoints of the current PEIR chapter (shown in Volume 3: Figure 7.13) are helpful to give a sense of the likely impact of the proposals on the wider landscape, but do not clearly address the heritage concerns set out at greater length below.

The assessment will need to be carried out in accordance with established policy and guidance, including the National Planning Policy Framework (NPPF) and the Planning Practice Guidance, as well as *The Setting of Heritage Assets*, Historic England Good



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Practice Advice In Planning Note 3 (Second Edition).

Chapter 8a: Cultural Heritage - Archaeology

We note that geophysical survey plots have been provided in PEIR Volume 3 along with baseline maps (Volume 3, 8a.1-8b2).

Non-designated archaeology is primarily the remit of the local authority. The applicant should, however, determine where non-designated archaeology is or has the potential to be of equivalent significance to designated heritage assets in order to address paragraph 5.9.6 of EN-1. We note there are some highly significant areas of archaeology identified within the scheme boundaries that will need to be considered in relation to equivalence.

8.2.6 We welcome the approach to evaluation set out here. Evaluation prior to the determination of the DCO is an appropriate mechanism for establishing risk, although we note the limitations that you have set out in 8.2.31.

8.5.3 We welcome the provision of a buffer zone around the scheduled monument on the edge of developable area A (bowl barrow 1080m northeast of Worsted Lodge Farm, part of a dispersed round barrow cemetery in Charterhouse Plantation (list entry 1019989)). The size of the buffer would need to be appropriate to the monument and established through an assessment of its setting.

8.5.13 This paragraph concerns the scheduled monument Fleam Dyke (list entry number 1006931), and states that 'the inter array connection design will ensure there are no direct impacts to the scheduled monument'. We welcome this statement of intent. We recommend, however, that this principle is stated clearly and consistently throughout the documentation to be submitted for the DCO application, and that a definite design approach is determined in detail before the application is made.

8.5.16 This paragraph concerns the proposed grid connection corridor and states: 'The construction within the Grid Connection Corridor will comprise pylons with Overhead Lines. Archaeological impacts will be limited to the footprints of the bases for the pylons and any associated infrastructure.'

This statement contradicts the information elsewhere that sections of underground cable are being considered in the grid connection corridor. Given that any such sections could disturb buried archaeological remains the proposals should be clarified



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before the DCO application is made. As we noted above, any excavation of the Devil's Dyke or the other scheduled monuments within the grid connection corridor would cause harm to the significance of these designated heritage assets and should be explicitly precluded as soon as possible.

8.6.2, 8.6.3 and 8.6.4 We note the approach to mitigation. Copies of the WSI and the DCO Requirement wording will need to be shared with Historic England prior to the submission of the DCO in order to determine their appropriateness. A copy of the draft Archaeological Management Strategy (AMS) and other control documents should also be shared.

Chapter 8b: Cultural Heritage - Built Heritage

8.2.1 Study Area (see also figures 8b.1 and 8b.2) Given the characteristically rolling topography of the landscape around the developable areas and the consequent limitation of long views, we consider the chosen study area (1km from the site boundary) to be appropriate. Where the landscape flattens considerably around the grid connection corridor there is much greater scope for impacts on heritage assets outside this area; we note that a selective approach has been taken here to include the Swaffham Priors Church Group. This seems a proportionate response to the character of the landscape and the distribution of designated heritage assets.

8.2.2 (see also Appendix 8a.3: Heritage Baseline Tables) At this stage, without more detailed information about the final design of the scheme, it is impossible to produce a full heritage impact assessment (HIA); we therefore agree that the approach taken here - to establish a heritage baseline identifying heritage assets within the study area and describing their significance, including the contribution made by their settings - is proportionate.

Given that many of the designated heritage assets within the study area form meaningful groups - as part of villages, or clusters of related buildings - we agree that in some places it might make good sense to attribute to such groups a single setting.

However, this approach should be taken very cautiously. We remind you that setting is defined in the glossary of the National Planning Policy Framework (NPPF) as 'the surroundings in which a heritage asset is experienced'. Even where two heritage assets are physically adjacent, the surroundings in which each is experienced may differ - if, for instance, one is tall windmill and the other an associated single-storey



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storehouse, then the setting of the former is likely to be much more extensive than that of the latter.

Similarly, even where the setting of adjacent assets is largely the same, the contribution that that setting makes to the significance of each asset might differ widely - for example, if there were a listed seventeenth-century agricultural worker's cottage next to a listed garage from the 1930s, any surviving infrastructure (hardstanding, forecourt walls, petrol pumps etc.) which was part of the setting of both buildings might well contribute positively to the significance of the latter whilst detracting from the significance of the former.

The approach taken in Appendix 8a.3 is consistently to group assets which are physically close together, and not only to attribute to them a single setting, but also to state that this setting makes the same contribution to the significance of all. Whilst this approach might be acceptable at an early stage in the development of an HIA, where some possible impacts can be discounted, it should not be considered sufficiently rigorous to inform the final version.

We have particular concerns about the implication made in Appendix 8a.3 that the setting of a conservation area is the same as the setting of the buildings within it. Conservation areas are designated heritage assets in their own right, and will almost certainly have different and more extensive settings than any group of buildings within them. In order to assess the potential impacts of the scheme on the settings of the conservation areas within the study area, we strongly recommend that a more rigorous assessment is undertaken in the development of the final DCO application.

8.2.9 We support the stated approach, subject to our detailed comments elsewhere in this response.

8.2.10 We agree with the statement that the scheme 'will not result in any direct physical impacts to any built heritage assets', and that the potential effects on such assets can be attributed to changes to their settings.

8.2.15 We note that PEIR Volume 4, Appendix 5.5 and PEIR Volume 3, Figure 5.1, which relate to the cumulative impact of the scheme together with other developments, have not been made available as part of the consultation. Whilst the omission is not likely to seriously change our views about the scheme it does make it impossible to advise, at this stage, about any design choices that have been or need to be taken.



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8.2.16 Similarly, we note that PEIR Volume 4, Appendix 8a.7, which contains the assessment criteria against which the impacts of the scheme on built heritage are to be judged, has been omitted from the consultation documents.

8.2.23 This paragraph mentions the churches of Swaffham Prior and Burwell as noteworthy 'historic built landmarks' in the long views that are possible across the flat areas around the grid connection corridor. The windmills at Swaffham Prior and Burwell should also be considered here; those at Swaffham Prior in particular are extremely prominent.

8.2.24 and 8.2.25 We agree with this identification of designated heritage assets within the site. You should ensure this information is given consistently in all chapters of the final Environmental Statement (ES).

8.2.30 See also above (**8.2.2** and **Appendix 8a.3**). Whilst we accept the grouping of designated heritage assets which share elements of a common setting as a useful tool to allow a 'proportionate assessment' at early stages in the development of the scheme, we strongly recommend that a more rigorous approach to setting is taken in the production of the final HIA.

8.3 Embedded Mitigation We support in principle the measures outlined here, but note that a full assessment of their effectiveness cannot be made until the details are known.

Table 8.3 We note the potential impact on the setting of the Church of St Mary, Weston Colville. From the text of the preliminary assessment it seems to us that the setting of the church and its contribution to the building's significance requires further clarification. The implication of the 'description of likely impact' is that views of the church from the wider landscape are the primary focus of the assessment.

The immediate context in which the building is experienced, however, is the churchyard. There are clear views out from the churchyard over the fields to the west which contribute positively to the significance of the building. When a more detailed assessment of setting is undertaken, we therefore recommend that views from the churchyard towards the site (especially to the west) are carefully considered.

We accept that most if not all of the PVs and associated infrastructure will be screened, and that the impact on the setting of the church is likely to be low. We agree with the assessment of the possible impact of elements of the scheme on views



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towards the church, and recommend that such impacts are avoided as much as possible.

Some small changes to the layout of the panels in the immediate vicinity of the church would seem possible and could potentially reduce any impacts. We therefore recommend the layout is reconsidered in this area.

8.4.6 and 8.4.7 We broadly agree with this preliminary assessment of the potential impact of the proposals on the Moat House moated site and the bowl barrow group in and around Hare Park.

8.4.8 As discussed above, the nature of the power transmission lines needs to be determined before the potential impacts on the significance of Fleam Dyke and the Devil's Ditch can be adequately assessed. In particular, the use of underground cables to cross either of these scheduled monuments would cause harm to their significance and should be explicitly and consistently precluded from the proposals.

The potential impact of new overhead lines on the settings of either earthwork will depend in part on the final design chosen. Whatever the case, however, we consider that there is likely to be some impact on the significance of both monuments through changes to their settings.

In the case of the Devil's Ditch, and judging from the form of the grid connection corridor, the proposals would result in a second line of pylons crossing the earthwork from south to north and then marching parallel to it for some distance on the approach to Burwell.

To reiterate, the setting of the scheduled monument is the surroundings in which it is experienced; in the case of the Devil's Ditch, these surroundings are extensive, and include relatively large areas of the landscape within which the monument is visible. The earthwork is a long, raised, linear feature, and is characteristically experienced both as a barrier to movement across the landscape, and as a route through the landscape itself, with routes either beside it or on top of it.

In general, an important aspect of the earthwork's significance is the way in which it dominates the flat lands to either side, and the way it relates to the naturally raised areas of the fen edges, especially to the south-east - as a man-made structure of such scale its power springs from the inevitable comparison with these natural features.



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In particular, the long-distance footpath which runs along the top of the monument provides near-continuous access to visitors and extensive views in both directions; the dominance of the earthworks within wide views of the landscape forms a considerable part of the visitor experience.

The proposed grid connection pylons would be highly visible, both in views of the Devil's Ditch, and in views from it. Although there is already a line of pylons which crosses the Devil's Ditch at Burwell gap, these take an oblique line across it, which softens the visual impact. The proposed new line of pylons would run more or less parallel to the ditch on the north side, which would not only invite comparisons between the two linear features but also bracket the earthwork for a considerable distance.

The path along the top of the earthwork just east of Burwell gap currently affords extensive views towards the higher ground to the south east, which remain unbroken by power lines. Whilst the erection of a new line of pylons here could broadly be seen as a minor addition into a landscape which has already accommodated similar changes, the specific impact on the significance of Devil's Ditch through changes to this aspect of its setting should not be underestimated.

We recommend that this aspect of the setting is considered in more detail in the full application for a DCO and that you seriously consider alternative arrangements for the cables to minimize the possible harm. Cumulative impacts and co-location of cabling with existing infrastructure or with other schemes (see above) should also be considered.

We consider that the equivalent impact of the inter-array connection on the setting of Fleam Dyke would be much lower. Fleam Dyke is of lesser stature than the Devil's Ditch in the surrounding landscape, and effectively has a less extensive setting. We understand that the inter-array connections are likely to be carried on traditional poles; given that there already exist similar power lines which cross the Dyke, and given that their height is such that they compete for attention with trees and tall hedgerows, we consider that the impact on the significance of Fleam Dyke would be minor.

We nonetheless recommend, however, that alternative arrangements for the cables should also be considered for this element of the scheme. Again, cumulative impacts and co-location of cabling with existing infrastructure would reduce harm and would potentially represent public benefit.



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8.4.10 We broadly accept the conclusion of this paragraph but note that any effects much be clearly assessed once the proposals have been developed. As above, we recommend that you undertake a more rigorous assessment of the settings of the conservation areas in particular, which are likely to be more extensive and more sensitive to change than the buildings within them.

We also recommend that you address the setting of St Andrew's Church, West Wratting, independently and in more detail. As at the church of St Mary, Weston Colville, the churchyard and its relationship with the land to north and east are an important part of the church's setting; changes in views from the churchyard towards the proposed development have the potential to affect the significance of the church, and should be explicitly assessed.

8.4.11 We broadly agree with the conclusions of this paragraph. Note that the contribution of the wider landscape setting of Swaffham Prior Church is different in kind to the contribution made by the same landscape considered as a part of the setting of Devil's Ditch.

As recommended above, you should include some consideration of the windmills at both Swaffham Prior and Burwell, which have a clear historic functional relationship with the wider landscape, and the significance of which could also be affected by the proposed grid connection.

8.8.2 We welcome the provision of a full heritage impact assessment, and advise that it takes account of our comments above. We strongly recommend, however, that this is prioritised, so that its conclusions can be taken into account in the development of the final proposals.

Table 8.4 As discussed in detail above, we do not consider that the setting or significance of many of the designated heritage assets included in the table have been considered in sufficient detail to warrant the conclusions as to the likely effects.

Historic England Position

Historic England has some concerns about the level of uncertainty about the proposals at this stage, and the consequent uncertainty about the nature and magnitude of the potential impacts on designated heritage assets. Whilst we are comfortable that the overall impact of the scheme on cultural heritage will not be large, and may be



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justified, the proposals have the potential to cause some harm to the significance of several designated heritage assets, including Fleam Dyke, the Devil's Ditch, the churches of Weston Colville and West Wrating, and several conservation areas.

Although we appreciate that some uncertainty is strategically acceptable at this stage, especially with respect to elements of the proposals which involve rapidly changing technologies, we consider that other elements are subject to well-understood constraints and could reasonably be developed in more detail.

Accordingly, we recommend that urgent and detailed consideration is given to the proposals for the grid and inter-array connections in order to minimize the possible harm to the scheduled monuments of Fleam Dyke and the Devil's Ditch. The following possibilities should be considered:

- Specifying the proposed routes in more detail, to minimize the impact on the settings of the monuments;
- Using buried cables rather than pylons for some or much of the proposed routes (including to the grid connection at the Burwell south sub-station) to reduce the impact on the settings of the monuments;
- Co-locating cabling either with similar existing or proposed schemes;
- Using existing gaps in the scheduled monuments (the Burwell Gap, e.g.) to cross the lines of the earthworks using buried cables.

More generally, we recommend that the heritage-related parts of the ES (a full HIA, heritage-related aspects of the LVIA) are expedited so that the potential impacts of the proposals on cultural heritage can be understood fully, and amendments made to the proposals to eliminate or suitably mitigate any harm.

In the light of the more nuanced understanding of setting and significance which a full HIA and LVIA analysis will afford, we recommend in particular that the proposed layouts (either of PVs or new screening) in developable area C are adjusted if necessary, to minimise the potential impact on the churches of Weston Colville (St Mary) and West Wrating (St Andrew).

As some if not all of the proposed works relating to Fleam Dyke and the Devil's Ditch would require scheduled monument consent, we urge you to open dialogue with Historic England as soon as possible, as part of the ongoing development of these proposals. We would also welcome the opportunity for further pre-application discussions, once additional survey information and analyses are available.



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Historic England

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Yours Sincerely,

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