Cambridgeshire County Council

My ref: KW.SC.29102025
Date: 29th October 2025
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Dear Downing Renewable Developments,

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 statutory consultation for the Kingsway Solar Farm proposals, which commenced on Wednesday 17th September and closes on Wednesday 29th October.

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.

Yours sincerely

Frank Jordan
Deputy Chief Executive and Executive Director

Cambridgeshire County Council

Our Reference: KW.SC.29102025

Kingsway Solar Farm: Comments on the Applicant's Statutory Consultation

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

This document contains the response of Cambridgeshire County Council to Kingsway's statutory consultation in accordance with Section 47(2) of the Planning Act 2008.

Cambridgeshire County Council is a host authority for the purposes of Section 42 of the Act, alongside East Cambridgeshire District Council and South Cambridgeshire District Council. This response covers a number of technical specialisms held within Cambridgeshire County Council including Transport Assessment (in its function as the Local Highways Authority), Sustainable Drainage Systems and Flood Risk (in its function as the Lead Local Flood Authority), Archaeology (through the Cambridgeshire Historic Environment Team), Ecology, and Public Health. This response will not therefore cover matters outside of the council's remit, which will be addressed in separate consultation responses by East Cambridgeshire District Council and the Greater Cambridge Shared Planning Service.

The council would like to note that the level of engagement by the applicant prior to the commencement of the statutory consultation was limited. Practice guidance states "the local authority should already be familiar with the information that the applicant provides for consultation (subject to any changes made following earlier non-statutory consultation)." Cambridgeshire County Council is of the opinion that there was limited opportunity for technical officers to engage with the developer and that the information provided for the meetings was often lacking in the detail required for meaningful discussion and review prior to the consultation commencement. Much of the information in the consultation material was new to technical officers.

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

Specialism	Proposal aspect referred to	Comments
Planning	40 year project	Whilst the proposals are referred to as temporary, being the permission sought is for 40 years, the council considers the impacts are of such a length of time to be considered permanent for most technical areas. Impacts of the scheme should therefore be considered as permanent and mitigation measures should reflect this.
Planning	Unknown location of substation	The 'Burwell South' Substation is a key element of the scheme without which the project is undeliverable. The understanding is that this is to be delivered separate to the project by National Grid. The location of the substation is unknown and thus it is assumed that the substation will be aligned with the existing Burwell Substation and the indicative pylon route is shown as such with a wide area of variation. The Preliminary Environmental Impact Report (PEIR) has no baseline for the pylon route. It is therefore not possible to assess its impact. At the point of application, it is appropriate to have certainty with regard to the location of the substation.
Planning	Phasing	Whilst it is outlined there being a construction phase, operational phase, and a decommissioning phase, the council queries if there are further phases for the replacement of photovoltaic panels and batteries over the course of the 40 years, understanding both technologies are not anticipated to have a productive lifespan for such a time. Currently the PEIR does not consider replacement of such infrastructure and the associated impacts as a distinctive further construction, or maintenance, phase. The council would welcome further discussion with the developer regarding how this can be captured and assessed as part of the Environmental Statement and mitigation measures captured in relevant management plans.
Air Quality	PEIR Volume 2 Chapter 13 Air Quality	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 reserves the right to comment on this subject through technical working groups and responses, in particular as it relates to Public Health.

Specialism	Proposal aspect referred to	Comments
Communities, Skills, Employment, Socio-economic	PEIR Volume 2 Chapter 14 Socio Economics and Population.pdf	The council welcomes the proposal for a community benefit fund. The response by the public for how this fund could be delivered is key to shaping the fund. The council would welcome further engagement with the applicant to discuss the appropriate governance arrangements and how best to secure the finance for the communities.
Noise	PEIR Volume 2 Chapter 12 Noise and Vibration	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 reserves the right to comment on this subject through technical working groups and responses, in particular as it relates to Public Health.
Climate and Carbon	PEIR Volume 2 Chapter 15 Climate Change	**PEIR Volume 2 Chapter 15 Climate Change: GHG Emissions** • Greenhouse Gas (GHG) Assessment: 15.2.19 states that the comparator used for net emissions will be "emissions associated with the generation of an equal amount of electricity using a natural gas-fired Combined Cycle Gas Turbine (CCGT) power station". This is provided in the document at 15.3.1-15.3.5. In PEIR Volume 4 Appendix 15.3 Methodology for Determining Significance of Effects it is stated at 1.1.4 that "The GHG assessment will theefore consider the Scheme's lifecycle GHG emissions and associated carbon intensity in two ways" to include both a comparison against a gas-fired turbine and "comparison of the Scheme's carbon intensity against other forms of renewable energy such as other solar schemes, wind, hydro, nuclear etc". This second comparator appears to have been omitted from the overall GHG Assessment section. The council would expect that this comparator, against a scenario of other renewable generation should be included in the impact assessment. • 15.3 Baseline Conditions GHG Assessment compares the baseline emissions to an alternative project or scenario. Reiterating comments made within the council's Environmental Impact Assessment (EIA) Scoping response, while comparison with generation of electricity using gas fired power stations may be the norm within the sector, it is not a methodology that the council

Specialism	Proposal aspect referred to	Comments
		considers aligns to the wider grid decarbonisation, associated Clean Power 2030 target and with National Policy Statement for Renewable Energy Infrastructure (EN-3), which at 1.1.3 reiterates government policy that "by 2035, all our electricity will come from low carbon sources, subject to security of supply", as it does not acknowledge the wider energy decarbonisation efforts underway and risks severely over-estimating the carbon benefit of this proposal. • Should the applicant wish to undertake direct comparison with other energy generation types, another low-carbon option, such as wind, would be a more appropriate comparator – which would align to the previous comment relating to the omission of such a comparison, despite committing to do so at 1.1.4 of PEIR Volume 1 Appendix 15.3 to provide a "comparison of the Scheme's carbon intensity against other forms of renewable energy such as other solar schemes, wind, hydro, nuclear etc" . These figures should be used as a counterfactual comparator to estimate the relative benefit of this renewable scheme as opposed to other technologies. • Future Baseline: The assumptions set out at 15.3.6 – 15.3.8 are considered appropriate noting the limitations identified in relation to data availability. **Appendix 15.4 – GHG Footprint Methodology** • The methodology outlined appears appropriate for this scheme, with appropriate data sets used. The clarity on the assumptions made is helpful. • Embodied Carbon: It is noted at 1.3.1 that the lack of detail on components and materials currently available means the embodied carbon emissions are estimates at this time. While this approach is satisfactory for this phase of the scheme development, the council would expect to see the embodied carbon figures revised at the earliest opportunity when the detailed inventory is produced. • Construction Transport and Site Plant & Machinery: It is helpful to see these recognised at this stage, however the methodology for these estimates is not provided and therefore cannot be scrutinised. • The benefits of this proposal on carbon emissions is one of, if not the, key justification for this proposal. Construction emissions are likely the main source of negative impact on carbon from

Specialism	Proposal aspect referred to	Comments
		this proposal. It is therefore paramount to ensure that the construction emission figures are as accurate as possible to ensure the justification for the proposal remains sound. The council would expect to see all the above carbon emissions figures updated as and when the relevant details come forward, along with the detailed calculations methodologies. This should then be used to review and update any carbon management plan in such a timely manner as to allow alternative materials or plant and machinery (etc) to be identified and used where possible. • **Operational emissions:** It is helpful to see that a conservative approach has been taken to this section. • **Decommissioning:** The emissions sources look appropriate, however in addition, emissions from any land use change should also be estimated. **PEIR Volume 2 Chapter 15 Climate Change: CCRA Assessment** • It is helpful that this has been included in the PEIR despite it being scoped out previously. Similarly, the clarification at 15.1.6 that the construction and decommissioning phases will be incorporated at a later date is helpful. • While helpful that the Climate Change Risk Assessment (CCRA) considers the overarching trends, there does not appear to be consideration for extreme events at his stage – though the council acknowledges extreme events will feature at a later date. Given recent climate analysis from the UK Met Office State of the UK Climate Report 2024 indicating "records are becoming more frequent, and that temperature and rainfall extremes are becoming the norm." The council would anticipate these form the key hazards and areas where resilience measures may be required. • It would be helpful to understand if/how the CCRA and GHG Assessment have been cross-referenced – the council notes that the Operational emissions calculations make assumptions related to equipment maintenance, repair and replacements. It would be helpful to understand if these assumptions reflect current best-practice only or incorporate an uplift resulting from climate extreme events.

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		• The table at 15.5.8 sets out climate risks and mitigations – it is disappointing to see a lack of consideration for green infrastructure as a means to manage risk, e.g. use of planting and landscaping to reduce overheating. These approaches would have added benefit for delivery of the proposal's biodiversity requirements. The council would strongly encourage the applicant to review the mitigation to integrate green infrastructure solutions ahead of materials or technological based solutions that come with their own carbon implications. The council reserves the right to comment on this subject further through technical working groups and representations.
Health	PEIR Volume 2 Chapter 12 Noise and Vibration	The council acknowledges table 122.3 Summary of preliminary residual effects and point 12.5.6 - given the short-term, temporary nature of construction impacts, and the requirement for mitigation measures to be implemented through a Construction Environmental Management Plan (CEMP), significant noise and vibration effects are not considered likely for these receptors. The council look forward to reviewing the CEMP alongside the Health Impact Assessment (HIA) as well as the greater review of the overhead lines impacts on sensitive receptors in the Environmental Statement (ES) in the Operational Phase.
Health	PEIR Volume 2 Chapter 13 Air Quality	The council welcomes point 13.2.4. South Cambridgeshire District Council requested the following: that the Air Quality Assessment consider the worst-case scenario of a battery fire and the resulting hydrogen fluoride vapour, that the applicant will be preparing a Battery Fire Safety Management Plan (BFSMP), and that the Environmental Statement Air Quality chapter will cross reference to the detail and mitigation within that plan in respect of Battery Energy Storage Systems (BESS) fire emissions. The council support the assessment methodology as noted in 13.2.9 and that the construction and decommissioning phase effects on human health have been assessed and look forward to the assessment as stated in 13.3.14. of the locations of sensitive human health receptors, including residential properties in proximity to the Site (that) will be presented in the ES.
Health	PEIR Volume 2 Chapter 16 Other Environmental Topics	The council welcome that Human Health, though originally scoped out of the Environmental Statement as a standalone chapter, is now being responded to via subsection 16.2 and most importantly that a standalone Health Impact Assessment will accompany the Development Consent Order (DCO) application (16.2.2) and where appropriate cross reference.

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		The council mentioned Solar cell efficiency in our previous consultation response – *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.* The council note that point 16.4.17. discusses recycling methods and assumes that there will be an increased recycling capacity over the operational and decommissioning phase of the Scheme. And there is extensive discussion of the waste hierarchy, 16.4.18. (Plate 16.1), highlighting the Scheme will prioritise prevention, followed by preparation for reuse, recycling and recovering, with landfill disposals as the last resort. The maintenance and decommissioning will be well addressed through the Site Waste Management Plan (SWMP) and the Waste Electrical and Electronic Equipment (WEEE) from a waste perspective. However, the council would request further information on the community health impacts of solar cell efficiency regarding the maintenance and or upgrading of solar cells and site hardware over time. This is in regards to effective waste management, as well as other efficiencies that can be passed on to improve the local community's health and wellbeing advantage – financial or otherwise. The council welcomes the clarification in the Health sub section 16.4.48 that a cumulative assessment will be undertaken at the Environmental Statement stage (that it is assumed that each development considered as part of the cumulative assessment would have embedded mitigation in place and additional mitigation, where necessary, to manage waste streams in accordance with the waste hierarchy and other relevant legislation and guidance).
Health	PEIR Volume 2 Chapter 17 Cumulative Effects Assessment	The council previously flagged concerns regarding Cumulative impacts – *Impactful clustering of solar schemes i.e. Sunnica Solar Farm is within 14 miles of proposed sites AB&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. (Cambridgeshire County Council non-statutory consultation response December 2024)* The council welcomes that the HIA Method statement highlights that cumulative effects will draw together the assessment of individual effects to present a qualitative description of the likely overall impact on health. (With the descriptors used to assess significance to reflect those included in the

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		Greater Cambridge Health Impact Assessment Supplementary Planning Document (SPD), and the Institute of Environmental Management and Assessment (IEMA) 2022 Guidance on Determining Significance for Human Health). The cumulative effects discussed so far in Vol 2 Chapter 17 are cumulative **intra** project effects and the council are concerned with the **inter** project effects such as multiple developments occurring in close proximity to the development **and** assessed in the context of mental health effects as well as physical health impacts.
Health	PEIR Volume 4 Appendix 16.2 Scoping Opinion Responses Human Health	https://www.kingswaysolarfarm.co.uk/wp-content/uploads/documents/PEIR Volume 4 Appendix 16.2 Scoping Opinion Responses Human Health.pdf - The council supports that the Aspect chapters for Air Quality, Landscape and Visual Impact, Noise and Vibration, and Traffic and Transport, have all considered the effects on human health in the preliminary assessment and that they will be fully cross referenced within the HIA. The council reserves the right to further comment on these aspects through technical working groups and future responses, as they relate to Public Health.
Health	PEIR Volume 4 Appendix 16.3 Health Impact Assessment Method Statement.pdf	Mental Health remains a primary consideration for the council and the council supports that the Health Impact Assessment (HIA) will include a focussed assessment on direct and indirect impacts on human health including mental health effects. The council notes the importance of reviewing vulnerable groups and welcomes that an Equality Impact Assessment (EqIA) will be undertaken and cross-referenced where appropriate.
Biodiversity	PEIR Volume 1 Chapter 3: The Scheme	Page 3-5. The council notes perimeter fencing will be used, comprising deer wire mesh and wooden post security perimeter fencing. The council seek that gaps are created at the base of the fence to allow passage of wildlife throughout the development. 3.4.17 The firewater containment features should be designed in discussion with the council, to ensure adequate measures are incorporated to prevent potential pollution of groundwater and ordinary watercourses. 3.5.3 The impact of the overhead line and underground cable options on wildlife sites, including Roman Road and Fleam Dyke Sites of Special Scientific Interest (SSSI), must be adequately considered. In accordance with the mitigation hierarchy, a design that avoids any adverse impact on wildlife sites should

Specialism	Proposal aspect referred to	Comments
		be selected. For example, a preference for overhead cables (if trident wood poles are set away from the wildlife sites) or if not possible, utilisation of trenchless installation of underground cables should be adopted. 3.6.4 The council understands that existing pylons are present within the local area and therefore, ask for consideration of ability to utilise these existing pylon lines for transporting electricity to avoid unnecessary additional infrastructure that could impact wildlife site and bird flight-paths. 3.6.5 The council notes that "Grid Connection would be installed underground at the point where it crosses the existing 400kV Overhead Line" and at other locations. The council is concerned about potential usage of underground cables across Devil's Dyke SSSI and the potential adverse impact on its calcareous grassland and associated species. This should be avoided. 3.10.23 The Outline CEMP should also reduce impacts to ground water, for example as a result of trenching and other invasive techniques. 3.12.4. The council notes that "areas where agricultural activity and associated habitats have been maintained or improved during operation" will be returned to the relevant landowners but is concerned that *"landowners may choose to revert the land to arable use"*. The council is concerned that land that may have developed into priority habitat or habitat of district / county importance, supporting notable species or provided as ecological mitigation will be removed following the decommissioning process. Therefore, the council seeks mechanisms be explored to secure long-term management of these habitats beyond the life of the solar farm.
Biodiversity	PEIR Volume 2 Chapter 6 Biodiversity	6.2.7. & Table 6.1 – the search radius for international designated sites should be increased to 30km for Special Areas of Conservation, Special Protection Areas and Ramsar with bat and bird qualifying species / assemblages. Table 6.1 – the study area for "Other habitats, bats, breeding birds, wintering birds, reptile….." should not be restricted to Site. Instead, it should take into account the Zone of Influence. For example, the distance to which invertebrates may be attracted to the solar arrays. Habitats and Vegetation, Table 6.2 (page 6-4) - The council notes that *"completion of additional UKHab surveys in 2025 will inform the requirement for additional botanical surveys in Area C, Inter Array Areas and the Grid Connection Corridor".* However, consideration must also be given to resurveying parts of

Specialism	Proposal aspect referred to	Comments
		Area A or B that were either inaccessible in 2024, or whether land management practices obscured their arable flora potential and that 2025 site conditions would make it favourable to resurvey these areas to gain a better understanding of the floristic value. This is particularly important to allow an accurate assessment to determine whether the site is considered of European or national importance for arable flora. Invertebrates, Table 6.2 (page 6-7) – The council notes that invertebrate surveys are ongoing in 2025, however it is unclear as to the scope of these surveys. The invertebrate survey and assessment must take into account the impact of operational solar panels on aquatic egg-laying species, including species potentially supported by habitats within and in close proximity to the site, as well as wildlife site with designatory invertebrate species (including Chippenham Fen). Adequate weight must be given to Cambridgeshire fens and their national importance for invertebrate assemblages, particularly associated with watercourses / drains etc. Bats, Table 6.2 (page 6-5) – The council is unclear why bat survey work is being restricted to April-October for all three sites. The bat survey work should also adequately assess potential for hibernation sites during the appropriate time of year; during winter months. Breeding birds, Table 6.2 (page 6-5) – the breeding bird assemblage surveys should also take into account British Trust for Ornithology (BTO) data that details the usage of the landscape by breeding birds. Reptiles, Table 6.2 (page 6-8) – The council is concerned that no species-specific surveys are scheduled for reptiles. South Cambridgeshire supports a very small number of slow-worm populations, with any population found likely to be of district or county importance. Given the potential for impacts, including direct harm and habitat destruction, to any isolated populations during construction, the council consider it appropriate that baseline surveys are completed to confirm their present / absence from the development site. Wintering birds, Table 6.2 (page 6-9) – the wintering bird assessment should also take into account BTO data that details the usage of the landscape by wintering birds. The 2025 surveys should also resurvey areas of Areas A / B that could not be accessed during the 2024 surveys (e.g. due to shooting).

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		Wicken Fen Ramsar SSSI, Table 6.4 (page 6-19) – acknowledgement should also be given to the presence of aquatic egg-laying invertebrates (including designatory species) that could be impacted by solar panels, and whether there could be an impact pathway for these populations. Eversden and Wimpole Wood SAC, Table 6.4 (page 6-20) – as part of the assessment, acknowledgement should be given to research that has identified potential adverse impacts of solar farms on bats. Cumulative impacts must also be considered, including East West Rail and other transport schemes (A428, busway and greenway schemes) and other development on this Barbastelle population. Hills Crofts CWS, Table 6.4 (page 6-22) – the table suggested that the Hills Croft CWS is located immediately adjacent to the development site. However, this is not consistent with the drawing contained within the PEIR Volume 3 Figure 2.3 Environmental Sensitivities - Biodiversity (3 of 9), which shows the local wildlife site located within the red-line boundary. Please review and clarify. Paulines Swamp CWS, Table 6.4 (page 6-22) – consideration should also be given to hydrological impacts, including changes to ground water quantity, which could impact the swamp habitat (particularly if there will be trenching within close proximity to the site). Randt's Wood CWS, Table 6.4 (page 6-22) – entry is incomplete as it notes 'none provided' in the 'Reasons for designation' column. Please contact Cambridgeshire and Peterborough Environmental Records Centre for information about reason for designation. Amphibians, Table 6.7 (page 6-29) - It's worthwhile noting that although there is a 'rogue' Great Crested Newt (GCN) record at Chippenham Fen, GCN are considered they are unlikely present at Chippenham Fen section of the Fenland SAC. Please refer to the European Site Conservation Objectives information for Fenland SAC, which discusses GCN at Woodwalton Fen and Wicken Fen (but not Chippenham Fen). Birds (breeding), Table 6-7 (page 6-31) – consideration should also be given to breeding birds utilising the watercourses / waterbodies, particularly kingfisher. Invertebrates, Table 6.7 (page 6-33) – greater consideration should be given to impact of solar panels on aquatic egg-laying species as well as the national importance of the wider Cambridgeshire fen area for invertebrates (as discussed above – see page 9 of this response).

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		Reptiles, Table 6.7 (page 6-34) – as discussed above, reptile surveys must be completed to ascertain the importance of the site for reptiles, particularly slow-worms which are found in very isolated, fragmented populations and therefore could be significantly impacted through construction / decommissioning works. 6.4.12 The council seeks further consultation on the development of both the Outline Operational Environment Management Plan and Outline Landscape and Ecological Management Plan.
Biodiversity	PEIR Volume 3 Figure 2.3 Environmental Sensitivities - Biodiversity (1-3 of 9)	Please review mapping of Cambridgeshire County Wildlife Site boundaries as these are misplaced within the map and drawing information. Firstly, they do not appear to show the correct 'shapes' of the wildlife site boundaries and secondly, they appear to have been misaligned to the baseline map. This has resulted in local wildlife sites being shown within the red-line boundary (e.g. Hills Croft CWS) that do not fall within the red-line boundary, and do not identify land within the red-line boundary that are selected as wildlife sites (e.g. Heath Road / Street Way Green Lanes CWS). The council would recommend contacting the Cambridgeshire and Peterborough Environment Records Centre for the most accurate version of these maps – they should also be able to provide a Geographic Information System (GIS) layer of the information (if required).
Biodiversity	PEIR Volume 3 Figure 7.15 Illustrative Landscape Masterplan	The council welcomes the retention of existing habitat and buffer zones along riparian corridors etc. However, it is unclear what the 'light green' shading specifies. The council assumes these will be landscape / ecologist mitigation & enhancement and therefore, the council would welcome early discussions about the potential habitat creation within these areas. Of particular importance will be the utilisation of these areas to avoid impact to existing ecological features, such as arable flora, farmland birds and provide buffers to wildlife sites. The proposed location of the solar panels and proposed landscape mitigation areas that have been positioned within areas of notable ecological features (e.g. arable flora) must be reviewed. Any adverse impact must be avoided (e.g. relocation of the solar panels / landscape proposals) and allow for optimal management for these habitats / species to be implemented. Given the site has been identified of national and potentially European importance for arable flora, then the council would expect the landscape scheme to prioritise maximising opportunities for these species / assemblages with a target to delivering a site of European importance for arable flora. It would be worthwhile discussing this opportunity with Plantlife Conservation Membership Charity, who have

Specialism	Proposal aspect referred to	Comments
		advised other farms within the nearby Breckland area and having success with improving the quality of their arable flora. The scheme also provides an excellent opportunity to deliver actions for Local Nature Recovery Strategy priority habitats and priority species. The council notes that there is “potential area for ecological enhancement and avoidance of archaeological features”. It must be noted that there can sometimes be conflicts between archaeological requirements and delivering ecological mitigation (as has been seen within the Sunnica solar farm development and trying to create Stone Curlew nesting plots amongst roman villas etc). It will be very important that the landscape architects / ecologists work in partnership with the project archaeologists to understand any constraints or limitations with utilising these areas for ecological mitigation / enhancement. It will be important for ecology management to be embedded within the Outline Historic Environment Management Plan.
Biodiversity	PEIR Volume 4 Appendix 6.2 Baseline Data Part 1	2.4.15 The council note that a full badger survey and sett classification has not been completed as part of the Preliminary Environmental Assessment (PEA). It is essential this survey work in completed, including mapping of badger territories, to ascertain the level of impact to badgers, their setts, foraging resources and territories. 3.3.2 The council note that key habitats for invertebrates were identifies as scrub, woodland and neutral grassland. However, consideration must also be given to waterbodies / watercourses, which may support aquatic egg-laying invertebrate species that will potentially be adversely impacted by solar panels. 3.3.5-3.3.6 Suitability of watercourses for fishes and other aquatic species must take into account the weather pattern, and whether the survey work during a dry period is indicative of typical site conditions (or as a result of prolonged drought). 3.3.22 Detailed Ground Level Tree Assessment for all areas impacted by the development should be completed. 3.3.37 It is unclear why the ‘other notable species’ section appears to only consider Brown Hares, particularly given there are other Cambridgeshire & Peterborough Additional Species of Interest and draft LNRS priority species that could be present within the habitats present.

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		4.3 The council welcome the identification of invasive plant species (Giant Hogweed, Japanese Knotweed and Cotoneaster), however consideration must be expanded to invasive aquatic fauna and flora, which persist in the wider landscape. 5.0 The conclusions within the PEA are not supported. Much greater detailed survey work is required for a number of species. For example, a 'recommended 30m buffer around badger setts' is not considered adequate given that the scheme has the potential to fence off large areas of badger territories / foraging group and as such, must greater survey work is required to ascertain the level of impact.
Biodiversity	PEIR Volume 4 Appendix 6.2 Baseline Data Part 2	UKHab secondary codes and individual land parcel / hedgerow / watercourse reference numbers should be included within the UKHab Habitats Map. The reference numbers will be needed to identify each area within the Statutory Biodiversity Metric. In addition, the council would expect mapping (perhaps a second set of maps) to show the conditions assessments for Statutory Biodiversity Metric.
Biodiversity	PEIR Volume 4 Appendix 6.2 Baseline Data Part 6	The survey work confirms that photovoltaic (PV) Area A and a majority of PV Area B were found to contain an arable plant assemblage of national importance. However, the rest of the development Site, including PV area C has not been surveyed and therefore, it is not possible to determine the importance of this section of the scheme for arable flora. The council notes that the report recommends that "mitigation efforts should concentrate on field margins and could include cultivation on rotation in spring and autumn". However, the council has concerns about the practicalities of managing field margins within a solar farm development. It will be essential that the scheme is well designed to ensure sufficiently wide margins (of at least 10m wide) can be incorporated into the design and avoid adverse impact from shading or changes in microclimate from the solar panel arrays. Elsewhere in Cambridgeshire, notable arable flora is dispersed throughout fields where sensitive farming practices are adopted, rather than being restricted to margins and therefore, mitigation should also look at opportunities to manage large areas for the benefit of notable arable flora (rather than being restricted to margins).
Biodiversity	PEIR Volume 4 Appendix 6.5 Embedded Mitigation	The council considers the proposed embedded measures are inadequate. Currently, the proposals do not provide the necessary measures to avoid, or mitigate, the impact to biodiversity. Of particular concern is the lack of embedded mitigation for ecological features that have been identified of district, county, national and potentially European importance.

Specialism	Proposal aspect referred to	Comments
		Given the site has been identified of national and potentially European importance for arable flora, the council would expect the landscape scheme to prioritise maximising opportunities for these species / assemblages with a target to delivering a site of European importance for arable flora. It would be worthwhile discussing this opportunity with Plantlife, who have advised other farms within the nearby Breckland area and having success with improving the quality of their arable flora. 1.1.4 Appropriate buffers of a "minimum 5m" is considered inadequate to protect notable arable flora and the council question whether this is sufficient distance to avoid impacts on egg-laying invertebrates (if solar panels will be position in close proximity to their habitats). Much wider strips, of at least 10m, but ideally much wider or larger areas must be incorporated into the design to avoid impacts. Mitigation for farmland birds does not appear in the PEIR, with the exception of Barn Owls. This is concerning given the impact of the scheme on farmland birds, particularly for ground nesting birds that require large open habitat for nesting. Large-scale habitat creation / enhancement opportunities for these birds must be incorporated into the design. 1.1.5 Habitat enhancement and creation should also be driven by the Cambridgeshire and Peterborough Local Nature Recovery Strategy's priority habitat (both mappable and unmappable actions) and priority species (including species with and without actions and those identified for translocation, as applicable) which is set to be published by end of 2025. For example, the proposed creation of ponds and temporary scrapes and pools will help deliver action F3A and provide habitat for notable farmland flora and invertebrate (see draft Cambridgeshire and Peterborough Local Nature Recovery Strategy (LNRS), which was out for consultation in summer 2025 https://naturalcambridgeshire.org.uk/lnrs/). However, this must not be at the expense of existing habitats and notable species (e.g. arable flora). 1.1.5 (bullet point 3). The council is concerned that arable field margin seed mixes are proposed. This must be sensitively designed and priority given to protecting and expanding the extent of indigenous arable flora populations. 1.1.6 Habitat enhancement and creation should also provide opportunity for amphibians and reptiles, particularly given that reptiles have been discounted from survey work and therefore must be assumed to be present throughout the scheme.

Specialism	Proposal aspect referred to	Comments
		7.69 (N.B. typo of paragraph numbering – falls between 1.1.7 and 1.1.8). Invasive species management should also consider the plethora of invasive aquatic species found in the local environment, which would require appropriate biosecurity measures (e.g. New Zealand Pygmyweed). Construction and decommissioning Phases (p4-75) There is very limited information provided for the Outline Decommissioning Environmental Management Plan (DEMP). The council would expect that habitats surveys, as well as protected species surveys (1.1.13), would be completed to identify any priority / irreplaceable habitats and any habitats of district / county importance that have established. The council would expect these habitats to be retained beyond the lifetime of the development.
Archaeology and Historic Environment	PEIR Volume 2 Chapter 8a	The applicant acknowledges in this chapter that the information provided and the assessments made are preliminary. The council would underline that point – the extent and number of Archaeological Zones, their nature and significance (i.e. the information contained in Tables 8.1 & 8.2) will change greatly once the results of the trial trenching evaluation are known. Therefore, the Residual Effects assessed in Table 8.3 will also change. The applicant needs to be aware that the density and/or sensitivity of archaeological remains in some areas may mean that the only way to mitigate by preservation in situ is complete avoidance, and the removal of those areas from development. This is acknowledged in e.g. para 8.6.1, with the caveat that it will occur only 'where practicable'. However, if it is the only way to avoid unacceptable impact on a significant archaeological asset then Cambridgeshire Historic Environment Team's (CHET's) position is that it must be the mitigation option adopted. The council notes that an inter-array connection corridor crossed the scheduled Fleam Dyke. As per Table 8.3 there is therefore theoretical potential for Major Adverse impact on remains of high significance, and field evaluation/geophysics for these areas is not planned until after determination. It is presumed that the applicant is planning above ground cabling or directional drilling here, but there does not seem to be reference to an explicit commitment to it, unlike the Grid Connection corridor. The Archaeological Management Strategy proposed is welcome, but this should apply not just to the construction phase, but to the entire life of the project. The argument is made here (e.g. para 8.5.21) that decommissioning (and operation) will likely have negligible physical impact on in situ archaeological remains compared to construction. So long as decommissioning works take place in a responsible way in accordance with an agreed plan this may be the case, but it is unwise to assume so without proper controls in place to safeguard the archaeology. Similarly, Operational Phase works refers

Specialism	Proposal aspect referred to	Comments
		to repair and replacement of infrastructure (PEIR Volume 1 Chapter 3 The Scheme 3.11.2) which may also have an archaeological impact if not conducted in a responsible manner. The statements made in paras 8.7.4 and 8.7.6 regarding 'no residual effects/ would not have a direct physical impact' are therefore not accurate. It is noted that locations for ecological enhancement/Biodiversity (3.9) and Sustainable Drainage Systems (SuDs) (3.8.7) have not been finalised. This is not unusual, but does mean that the effects of these have not been assessed in any detail in Chapter 8a, but may have considerable impact on archaeological assets. The forthcoming Cultural Heritage Chapter of the Environmental Statement and the Outline Archaeological Management Strategy should take these impacts into account, in accordance with the Outline Construction Environmental Management Plan (CEMP) and Outline Landscape Ecological Management Plan (LEMP). Specific comments regarding Chapter 8a: • 8.2.3 When will the Archaeological Desk Based Assessment (ADBA) for the Grid Connection Corridor be made available to Consultees? • 8.2.5 What was the reasoning behind not providing a geophysical survey for the Inter-Array areas? • 8.2.6 This is not the response from Cambridgeshire Historic Environment Team (CHET), this is the response from the Planning Inspectorate in relation to the Scoping Opinion. • 8.2.8 CHET does not entirely accept this. • 8.2.22: Intrusive archaeological fieldwork is conducted by trained professionals and leads to a greater understanding of the heritage asset (i.e. preservation through record) so should not be equated to direct loss of the asset. • 8.3.11 Inter Array cabling may result in considerably more than minor impact. • Table 8.2. The council accepts the majority of these assessments (given currently available information) with the exception of the following:

Specialism	Proposal aspect referred to	Comments
		○ B3: Some concerns with this assessment. It is a very regular rectilinear enclosure with arguably some villa potential. Magnetometer survey will have struggled to pick up any internal structural remains if so. ○ B7: There is a possibility that the linear anomalies leading to the east could be related to the Fleam Dyke in some way. This area is directly adjacent to the Dyke and to scheduled archaeology - Low to Moderate seems insufficient – the council would have this as Moderate to High. ○ C3: The council would assume a minimum of Moderate due to the presence of pit clusters and likely association with archaeology present. ○ C4: This one is definitely not low. It is clearly related to e.g. C5. Pit clusters are potentially very interesting. Low to Moderate at an absolute minimum. ○ C17: Surely minimum Moderate in line with other possible barrows. ○ C6, C7, C9, C10, C16, & C18: All of these could be medieval – shrunken medieval villages, or medieval earthworks given their landscape location. No major problems with the preliminary Sensitivity assessments however the council advises changing Table 8.3 and section 8.5 in line with the above recommendations. • 8.5.10: As above, the council does not agree with the assessment of C4 as Low Sensitivity at all. • 8.6.9: CHET should be consulted on the appropriateness of any mitigation strategies.
Landscape and Visual		Comments relating to landscape and visual are being provided by the district councils. It is noted the height of the PV panels is 4.2m. The impact particularly for Public Rights of Way (PROW) users alongside and traveling through fields of solar PVs will be greater than the more common 2.5-3m high panels. The consultation material does not appear to demonstrate any assessment of the options of panel heights and why 4.2m has been proposed. The landscape and visual impact is significant and it needs to be demonstrated the design is such to minimise its impact. Noting that the location of solar PVs is indicative, the council would welcome further engagement to determine in more detail the location of Solar PVs and their impact on wider landscape views. The

Specialism	Proposal aspect referred to	Comments
		council reserves the right to comment on this subject through technical working groups and future representations.
Land Use, Quality, Soils and Agriculture	PEIR Volume 2 Chapter 10 Soils and Agriculture	The council reserves the right to comment on this subject through technical working groups and future representations. It is noted that the majority of agricultural land within the scheme boundary is classification 3a and above, and therefore Best and Most Versatile (BMV) agricultural land. Para 10.2.13. "*The potential effect of the Scheme on food production has not been considered because the utilised agricultural area (UAA) across the UK is 16.8 million hectares in 2024, therefore the total agricultural land take from this Scheme accounts for less than 0.01% of the UAA*." This does not reflect the local context and productivity of the agricultural land most of which is Best and Most Versatile. "*Additionally, throughout operation, significant proportions of the Site will be able to be grazed, which will help increase soil organic matter and overall soil quality*". There is no certainty the land will be used to graze on and the benefits identified realised. Therefore, this cannot be assumed and a reason for food production to not to be considered. Noting the assessment is preliminary and further details of the mitigation to prevent land degradation will be outlined in the Outline Soil Management Plan (SMP) and Outline Construction Environmental Management Plan (Outline CEMP) the council reserves the right to comment further through technical working groups and future responses to the scheme.
Minerals and Waste	PEIR Volume 2 Chapter 16 Other Environmental Topics	**Waste** Waste: The forthcoming CEMP should seek to minimise and reuse as many suitable materials onsite as possible. A requirement should be imposed requiring the submission and approval of a decommissioning and restoration of the site prior to the end of the life of the site, to the relevant local planning authority. Decommissioning, restoration and aftercare should be carried out in accordance with the agreed Decommissioning plan.

Specialism	Proposal aspect referred to	Comments
Minerals and Waste	PEIR Volume 4 Appendix 16.4	**Proximity to Great Wilbraham Quarry** Paragraph 1.2.5 of the PEIR Volume 4 Appendix 16.4 Draft Mineral Safeguarding Statement states *"...the comments made by the CCC are no longer relevant since the Great Wilbraham Quarry is no longer part of the Site.*" The council would still like to highlight Great Wilbraham Quarry is adjacent to the site boundary, and as shown in PEIR Volume 3 Figure 7.15 Illustrative Landscape Masterplan.pdf, and PV panels are proposed within 100m of the site. Great Wilbraham Quarry is a chalk quarry and inert landfill, with onsite processing of inert and non-hazardous soils and hardcore with a crusher, screener and wash plant. Policy 16 of the Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021) seeks to safeguard minerals facilities, such as quarries. It states that development (within a Consultation Area, which this site is,) will only be permitted where it is demonstrated that the development will not prejudice the existing or future use of the area, i.e. the quarrying (and restoration) operation for which the Consultation Area 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 the Consultation Area has been designated. Great Wilbraham Quarry is safeguarded under Policy 16 and has a Consultation Area that extends 250 metres from the site boundary. The Environmental Statement should recognise the developments proximity to the quarry and identify any issues relating to the compatibility of the two uses. The sensitivity to the PV panels to dust should be detailed within the Environmental Statement. **Prior Extraction** Para 5.4.6 of the PEIR Volume 4 Appendix 16.4 concludes "*As the Scheme is not permanent and would be decommissioned after the lifetime of approximately 40 years, it is considered temporary and reversible, and no prior extraction of the mineral is required*" Given the nature of the project, (i.e. Solar PV and associated connection works), the council, in its role as Minerals and Waste Planning Authority (MWPA) and the safeguarding of minerals, agrees with this conclusion; the MWPA is content that Policy 5, in that respect has been met.

Specialism	Proposal aspect referred to	Comments
Water Resources and Flooding		The council has reviewed the Preliminary Environmental Information Report (PEIR) and associated documentation. The council welcomes the inclusion of several positive elements within the proposal and offer the following comments and considerations. **Positive Aspects of the Proposal** • **Watercourse Responsibilities**: The identification of responsible authorities for watercourses within the site boundary, including Internal Drainage Boards (IDBs) and the Environment Agency, is welcomed and provides clarity for future management and consenting processes. • **Climate Change Consideration**: The proposal appropriately considers climate change within the context of surface water flood risk, acknowledging relevant climate change uplifts dependent on the lifetime of the development. • **Strategic SuDS Integration**: The inclusion of strategic Sustainable Drainage Systems (SuDS) features such as swales and the maintenance of vegetation cover within solar array areas is supported. • **Substation and BESS Drainage Provisions**: The proposal to incorporate long-term SuDS features (e.g. swales, infiltration trenches, attenuation ponds) within substation and battery energy storage areas are supported. However, further detail is required regarding approximate locations of SuDS features, outfall locations, discharge rates, and attenuation volumes. • **Construction and Decommissioning Surface Water Management**: The commitment to provide a Construction Environmental Management Plan (CEMP) and Decommissioning Construction Environmental Management Plan (DCEMP), including surface water management and treatment controls via SuDS, is supported. • **Flood Risk Avoidance**: Based on PEIR Volume 3, the location of substations and BESS compounds outside areas of surface water flood risk is noted and supported by the Lead Local Flood Authority (LLFA).

Specialism	Proposal aspect referred to	Comments
		• **Watercourse Buffer Zones**: The proposed 9–10m buffer zones adjacent to watercourses are appropriate and supported by the LLFA. • **Greenfield rates**: The outline drainage strategy's intention to mimic the existing greenfield runoff characteristics is supported. **Further Comments and Considerations** • **Construction Phase Surface Water Management**: Further detail is required regarding surface water management during the construction phase, particularly for temporary compounds associated with overhead cables and grid connection corridors. These compounds should be located in areas of lowest flood risk, and appropriate drainage measures must be implemented to prevent water quality deterioration. • **Watercourse Crossings and Alterations**: While the responsible authorities for watercourses are identified, no further information has been provided regarding proposed crossings or alterations. Clarification is needed on how these works will be consented and delivered. • **Missing Documentation**: Reference is made to PEIR Volume 4 Appendix 16.10, but this document has not been provided for review. • **Early Review of Drainage Strategy**: Whilst it is acknowledged that, an outline drainage strategy will be developed for the final DCO application, it would be beneficial to review the drainage strategy at an early stage so that the design standards can be agreed prior to final submission.
Traffic and Transport	PEIR Volume 2 Chapter 11 Traffic and Transport	The contents of the PEIR Volume 2 Chapter 11 indicate that a thorough assessment of Traffic & Transport impacts is taking place. The submission lacks sufficient information at present to inform the council's view on the acceptability of the scheme, but such information is expected to be within the Environmental Statement, Transport Assessment and Outline Construction Traffic Management Plan. 11.2.23 states "Highway links within the Study Area that do not meet the above Institute of Environmental Management and Assessment (IEMA) thresholds are considered to experience non-

Specialism	Proposal aspect referred to	Comments
		significant effects on transport as a result of the Scheme and no further assessment is required." This statement is correct only in relation to the environmental impacts of the scheme induced traffic. Network (junction) capacity and safety will need to be given further assessment in the Transport Assessment and Outline Construction Traffic Management Plan. In addition to the Outline Construction Traffic Management Plan (CTMP) requirements listed in 11.4.7, the council would welcome measures to prevent mud and debris from being deposited on the highway during construction, reinstatement plans for any temporary highway works, use of banksmen and / or access control and protocols for the repair of any damage caused to the highway during construction. While typical access design principles can be agreed, each access will need a bespoke design to address site specific constraints. The application will need to provide sufficient detail to ensure accesses are viable, including showing highway boundary, and where appropriate vehicle tracking and visibility splays. If there are any access restrictions such as a culvert, a survey may be needed. Three road collision cluster sites are within the study area, A1303 / Swaffham Heath Road, A1303 / Little Wilbraham Road and A14 J35. The council would expect traffic impacts at these junctions to be given careful consideration as part of the Transport Assessment to determine if intensification linked to the scheme is likely to exacerbate existing safety issues. Subject to the proportional impact of these schemes, mitigating safety measures may be required. Due to the recently completed safety scheme at the A1303 / Swaffham Heath Road junction, the need for further mitigating measures is not considered likely but for avoidance of doubt, the site should still be subject to assessment. The principle of routing construction traffic along the strategic road network as far as possible before switching to local roads is agreed, however there is opportunity to rationalise the routing shown in PEIR Volume 3 Figure 11.3 Indicative Access Points and Routes. In particular, it would appear that there is opportunity to remove routing of cars / Large Goods Vehicles (LGVs) through the village of Balsham (listed as a sensitive receptor) to which the council would welcome consideration. Noting the comments below in respect to PROW and diversions, the use of Westley Bottom Road (link 66) as a traffic route is not appropriate based on the current width and condition of the byway. A level of mitigation would need to be agreed prior to the use of this link as a haul road, such mitigation would likely include provision of passing places and a surface improvement.

Specialism	Proposal aspect referred to	Comments
		PEIR Volume 3 Figure 11.2 Highway Links across the Study Area. Links 31, 32, 33 and 34 have narrow carriageways which are less than 5m width for substantial length, and in places are as narrow as 3.5m. Mitigation in the form or widening or provision of passing places may be needed in response to construction traffic. Link 18 has variable width and tapers to a single lane width. The exact placement of the access point B-1 (PEIR Volume 3 Figure 11.3 Indicative Access Points and Routes) is unclear, but in light of the substantial volume in construction traffic forecast for Valley Farm Road (244% uplift), the access will need to be in advance of the reduction in carriageway width. The council would welcome in future submissions, plans which spatially show traffic flows (incl. change) on a map with access points. In addition to accesses, five crossings are proposed (C-3, C-6, C-7, C-8, C-9). The use of such crossings should be restricted to cars and LGVs, unless managed by banksmen and / or temporary traffic control. Even where appropriate visibility is achievable, crossing of rural de-restricted roads by heavy and slow traffic can be hazardous. Of course, the risk will vary on a crossing-by-crossing basis depending on traffic flows, observed speeds etc. but the latest Stage 2 submission does not include sufficient detail to judge the risk. Further clarity is expected in future documents. **Active Travel** Para 11.3.32 states that 'most of the roads surrounding the Site, with the exception of the A11 and A14, are generally lightly trafficked and therefore would not deter cyclists.' This is not true. Most of the rural roads around the site are national speed limit and busy enough to feel very unsafe and be unsuitable for cycling during peak hours, certainly for more vulnerable users such as school children. Some of the routes have been identified as priorities for improvement to make safe for active travel for this reason, as set out in para 11.3.31. Para 11.3.33 has no information about existing walking facilities such as footways through villages and formal crossing points. Link 27: The route to school (Bottisham) and to the National Cycle Network (NCN) route to Cambridge on the A1303 from the Wilbrahams crosses Wilbraham Rd at the end of Primrose Farm Rd. This is currently a difficult crossing due to speed of traffic so with the predicted significant increase in traffic, including Heavy Goods Vehicles (HGVs), as a result of the scheme, mitigation is needed to improve the

Specialism	Proposal aspect referred to	Comments
		safety of the crossing for Non-Motorised Users (NMUs). The crossing should be included in Table 111.12: Summary of Receptor Sensitivity. Link 43: Table 111.12: Summary of Receptor Sensitivity does not highlight the crossing movement from residents to the east of the B1052 who are walking or cycling to the station. There is currently no formal crossing of the B1052. This is highlighted as a route that is unsuitable for cyclists in our Transport Proposals Database and even a small increase in traffic is likely to lead to an increase in fear and intimidation. Link 57 & 58: these links form part of the Greater Cambridge Partnership (GCP) Swaffham's Greenway and there are proposals to widen the off-road path, including some carriageway narrowing. This needs to be considered in the proposals. Link 51: this forms part of the GCP Bottisham Greenway with widening of the off-road path, and there are also aspirations to improve the crossing points on this link to facilitate access from the Wilbraham's to the NCN route to Cambridge. This needs to be considered in the proposals. Link 62: the link from Burwell to Exning is being developed by Suffolk County Council with developer funding with ongoing links proposed to Fordham so an increase of traffic through the village will need mitigation. **Transport Assessment** A full Transport Assessment, Travel Plan and Outline CTMP will be required as part of the DCO for Kingsway Solar Farm providing detailed analysis with further details on the measures to reduce any potentially significant likely effects identified. In preparing the Transport Assessment (TA) the applicant is referred to the council's Transport Assessment Requirements January 2024 of which a copy can be found in the link below: https://www.cambridgeshire.gov.uk/business/planning-and-development/developing-new-communities/ As such a TA should consider the following in its content: • The planning and transport policy context of the development.

Specialism	Proposal aspect referred to	Comments
		• Reference to the potential for use of other transport modes to the development site, including bus, rail, cycle, and walking. To include reference to the location of the nearest bus stops in relation to the development and facilities at the local bus stops. • Identification of the traffic related study area including any key junctions that may be affected by the development. • Baseline traffic surveys at key junctions and consideration of any committed developments in the area that may add to local traffic flows if shown to be required. • Previous 60 months accident records as obtained from Cambridgeshire County Council Cambridgeshire Insight – Roads, Transport and Active Travel – Road Traffic Collision Data for the study area. • Existing trip generation at the site from surveys or if not possible then Trip Rate Information Computer System (TRICS). • Trip generation assessment for the proposals from surveys taken from any other nearby similar sites and/or TRICS as a comparison. • Trip distribution on the network according to a clear methodology. • Future year assessment of the key junctions with the development. • Assessment of any mitigation for vehicle impacts, and difficulties of access by walking, cycling and public transport to the site. • Travel Plan and Welcome Travel Packs for residents and other uses. Chapter 11 Traffic and Transport para 11.2.79. states that Traffic surveys for some local junctions and roads on the surrounding highway network were undertaken in March 2025, whilst older Department for Transport (DFT) counts are also used. The document states that this will be supplemented by further survey data which is scheduled for collection in September 2025 and will inform the Environmental Statement. The council's Transport Assessment (TA) team agree with this method as all data should be recent, and the scope of the surveys is currently being discussed and agreed with the highway authority. It is advised that National Highways should also be consulted on the traffic survey data and locations. Para 11.5.54. It is stated that links 62 and 63 are considered to be of high sensitivity owing to their location in Burwell and Exning adjacent to local schools. However, it does not look like the junctions in this area have been surveyed. It is recommended that some data is obtained for this area if this is the case.

Specialism	Proposal aspect referred to	Comments
		A map should be provided with the Transport Assessment showing the predicted changes in traffic flows on the various links and routes that will be used, highlighting where the impact could be significant. Any proposed improvements should also be provided. Upgrading of routes where it is considered necessary to cater for additional or larger vehicles should be included. The forecast number of trips should include all movements to and from the site, by all modes, including: vehicles associated with construction of the Scheme, deliveries, the removal of materials and waste, and movements associated with construction workers. The TA should look at the impacts of the additional trips and undertake capacity modelling on junctions as required. Further information should be provided detailing the proposed mode share for the construction workers. Targets should also be included within the Travel Plan. Details will be required showing that there is adequate space provided within the Site to ensure no queuing back onto the surrounding road network occurs by HGV's or other vehicles, and that all worker vehicles can be accommodated to avoid impacting the surrounding areas with on street parking. A parking accumulation exercise should be undertaken. Some information should be provided regarding the expected number of traffic movements during the operational phase and any parking requirements, though it is appreciated this will be much lower than the construction phase. The TA needs to include detailed worker numbers showing where they are likely to travel from and by mode to inform the Travel Plan to enable the best mitigation to be secured. Detailed assessment of the Peak Hour effects and consideration of wider measures and mitigation to reduce effects such as Construction Worker Travel Plan measures are required. It is estimated that construction of the Scheme would last 24 to 36 months. It has been assumed that construction would commence in 2028 and would take 36 months, with a completion year of 2031. 2031 has therefore been assumed to be the future baseline year for this assessment as it is the most distant year and has the greatest level of background traffic growth. This is accepted.

Specialism	Proposal aspect referred to	Comments
		At this stage, cumulative schemes have not been included in the assessment as the applicant needs to undertake further analysis to determine the cumulative schemes and associated traffic. This should be agreed with the council in due course. The latest Personal injury collision data should be included when the full application is submitted to ensure this remains up to date. Any cluster sites need to be assessed to determine whether the impact of this development will require any additional mitigation at these junctions. A Sustainable transport audit of the routes used by construction traffic and workers should be provided, and any mitigation such as footways/ cycle ways identified as part of the mitigation measures. It is understood that an Outline CTMP (Construction Traffic Management Plan) will be developed as part of the DCO Application which will set out the routes that HGVs would adhere to when accessing the Site. This will also include measures to improve the sustainability of worker travel, along with other measures to minimise transport effects from construction traffic. The routes proposed should have the least amount of impact on the surrounding area and residents. This should be agreed with the Highway Development Management team at Cambridgeshire County Council. The Travel Plan will be a key element of this development in terms of mitigating the impacts. There are a significant number of construction employees who will travel to the various sites every day during the construction phase. Shuttle buses will be one of the main focuses on mitigation to ensure that the workers vehicles have the least amount of impact on local roads and villages as possible. Therefore, it is important that a well thought out strategy is proposed showing the potential number of buses required, where collections could be or where the workers are able to park and then get shuttled to the various areas to minimise impacts. A detailed proposal is required along with commitments for funding this mitigation. A car share system would also need to be implemented to match potential sharers and to help staff identify any colleagues who could potentially be collected along their route to / from the site to encourage local construction workers to car share to reduce single occupancy car trips. Incentives may also need to be thought through and implemented. The document states that based on knowledge of similar projects, construction workers will adopt car sharing to / from construction sites. In addition, car sharing will be actively encouraged as a measure in the Outline CTMP which will be submitted as part of the DCO Application. An assumption that each

Specialism	Proposal aspect referred to	Comments
		vehicle will accommodate 1.5 workers has been made to determine the preliminary worker vehicle forecasts. Additional information should be included to back up this assumption of 1.5 and show that it is achievable.
Public Rights of Way (PROW)	PEIR Volume 2 Chapter 7 Landscape and Visual Amenity	After planting is established, there will still be significant level of impact on the visual receptors on a large number of paths. Equally, plant screening at some locations is likely to remove longer distance views across the countryside. The council expects the applicant to provide other mitigations for potential negative impacts on public rights of way or public access users. The council would welcome engagement on this matter from the applicant. The consultation material states to use byway 40/7 as a haul road at site C. Any works to make the byway suitable for a haul route presents a risk to current Landscape and Visual Amenity of that route being lost, if vegetation or surfacing is changed. Change of surface of PROW must be Authorised by Cambridgeshire County Council. The council has been made aware this was meant to read 'alongside'. The above comment relating to landscape and visual amenity would still apply. Furthermore, there would be significant impacts to users of the byway if a haulage route was to operate alongside. The council would welcome further engagement to seek to minimise these impacts.
Public Rights of Way (PROW)	PEIR Volume 2 Chapter 11 Traffic and Transport	Where temporary or permanent diversions to PROW are required the Local Highway Authority must be consulted so that they can be satisfied that the alternatives are appropriate. Where construction access or cable routes utilise or cross Public Rights of Way, then prior to the commencement of development, a dilapidations survey shall be submitted to and approved in writing by Cambridgeshire Highway Authority. Any changes of surface either temporary or permanent and reinstatement condition to be agreed with Cambridgeshire County Council. The proposed use of a public byway as a haul road is incompatible with maintaining access to PROW during the construction phase. Whilst the Applicant refers to temporary or permanent diversion routes, it is unclear at this stage whether they would be appropriate.
Public Rights of Way (PROW)	PEIR Volume 2 Chapter 12 Noise and Vibration	Receptor sensitivity to noise listed in PEIR Volume 2, Chapter 12 is limited to residential receptors. There are 45 PROW that intersect with the Developable Areas, the Grid Connection Corridor or the Site Boundary. During the construction phase there will be significant noise impacts on users of the PROW

Specialism	Proposal aspect referred to	Comments
		network and need to be considered in the assessment and mitigation. Whilst the noise impacts may be considered temporary, recreational users will be sensitive to it. Operational phase. There is a Byway directly adjacent to the BESS compound. Whilst users will only be affected as they pass by the compound, it can distract horses, and this should be considered in the assessment of noise impacts.
Public Rights of Way (PROW)	PEIR Volume 2 Chapter 14 Socio Economics and Population	The PEIR assessment primarily considers where connectivity in terms of journey distance is changed as a result of the scheme. It is necessary that the public's enjoyment of the path is also considered, since PROWs are used primarily for recreational purposes. The plans provided to date, are insufficiently detailed for the council to comment fully on the proposals. The impacts to the PROW network will need review by Cambridgeshire County Council once further information is provided.
Emergency Planning		It would be expected that the operator has an effective emergency plan in place during all phases, to respond to any incident taking place. This would include ensuring effective liaison with the emergency services, effective on-site command and coordination, along with effective access and egress arrangements, and the sharing of relevant information about the operation and risks existing on site. This would be essential to ensure an effective and timely response to any incident that might occur.