

PINS Reference: EN010165
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Kingsway Solar Project Team
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Electronic submission only

Dear Sir / Madam

Application by Kingsway Solar Farm Limited on behalf of Downing Renewable Developments for an Order Granting Development Consent for the Kingsway Solar Project (PINS ref: EN010165): Response to Statutory Consultation (SC-1)

Introduction

1. I am writing on behalf of South Cambridgeshire District Council, hereafter referred to as 'SCDC', in response to the Statutory Consultation (SC-1) for the Kingsway Solar Development Consent Order (DCO). The consultation commenced on 17 September 2025 and invites comments until 29 October 2025.
2. The proposed development is classified as a Nationally Significant Infrastructure Project (NSIP) under sections 14(3) and 15(2) of the Planning Act 2008 (as amended) ('the Act'). This designation requires that an application for a Development Consent Order (DCO) be submitted to the Secretary of State in accordance with section 31 of the Act.
3. SCDC understands that it would act as one of the host authorities for the Kingsway Solar DCO under sections 42 and 43 of the Act as the development is located within the district.

Engagement and Technical Content

4. The proposed NSIP would be determined having regard to the relevant National Policy Statements (NPS) EN-1 and EN-3. EN-1 also refers to the Secretary of State's ability to consider the National Planning Policy Framework (NPPF) and National Planning Guidance (NPG), together with, where appropriate, relevant Local Development Plans.
5. The Government's Guidance: "*Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects*" clearly outlines the expectation that applicants for a NSIP will adopt a "front-loaded" approach to their proposals. This

includes a strong recommendation for early engagement with expert bodies and the local community, alongside the more formal provisions for engagement outlined in Chapter 2, Part 5 of the 2008 Act.

6. The assessment principles in Chapter 4 of EN-1, together with the guidance on assessing generic impacts in Chapter 5 of EN-1, make clear the importance of good design and of the early consideration and assessment of impacts, particularly in the context of exploring mitigation, at the earliest stage of a project. Part 2.10 of EN-3 emphasises that, notwithstanding the technical and operational parameters affecting solar photovoltaic (PV) generation, applicants are expected to devote significant effort towards identifying, assessing and minimising the adverse impacts of their proposals.
7. Against that policy backdrop, it is regrettable that the applicant has undertaken very limited engagement and consultation with the Local Authority and its specialist officers to date. Through the Greater Cambridge Shared Planning Service (GCSP), SCDC agreed the principle of entering into a Planning Performance Agreement (PPA) with the applicant in November 2023 to facilitate early, structured and collaborative engagement.
8. At the time of writing, the PPA has not yet been concluded. Progress has been constrained by the applicant's failure to advance key workstreams or to meet agreed milestones for information sharing and dialogue ahead of the Statutory Consultation. This has severely impacted opportunities for constructive, early and structured engagement. This is contrary to the expectations set out in the Government's *Guidance on the Pre-application Stage for Nationally Significant Infrastructure Projects* and the principles of early and effective consultation set out in National Policy Statements EN-1 and EN-3. The Council has therefore sought assurances from the applicant on means to bring effect to the NPS expectations for effective engagement for the future phases of this project.
9. The PPA process was intended to include meaningful Technical Working Group (TWG) discussions with specialist officers, opportunities to review draft documents and contribute to scheme design, and review of the Draft Preliminary Environmental Information Report (PEIR). The Council considers that early engagement of this kind is essential to inform the design of a project before it reaches design freeze, ensuring that the needs and concerns of local communities, as well as the technical and environmental considerations identified by statutory consultees, can be fully understood and addressed through appropriate mitigation. By limiting early dialogue, the applicant has curtailed this important opportunity to shape and refine the scheme in a way that responds constructively to local context and stakeholder input.
10. To date, only Noise, Odour, Public Health, and Landscape TWGs have convened. These meetings, which began in late July 2025, represented the first opportunities for Local Authority officers to participate in pre-application discussions. However, they

have been limited in scope, often described as “early stage” or “high level”, with detailed information deferred to later stages.

11. It is particularly regrettable that only one Landscape TWG meeting has taken place to date, held at a very late stage and with very limited information provided. Key details, including the proposed pylon route and the location of the photovoltaic (PV) panels, remained unresolved at that time. Furthermore, landscape-related information was not made available to officers until the commencement of the Statutory Consultation. As a result, the Council’s Landscape Officer was not afforded the opportunity to be involved in a key element of the schemes design and configuration that result in potentially significant adverse effects.
12. Specialist officers for Ecology, Heritage, and Climate have also not yet been engaged in any TWG discussions with the applicant. The Council notes that these key matters were also not addressed ahead of the Statutory Consultation. Given the importance of these subject areas to the overall assessment and evolution of the scheme, their omission is a serious concern.
13. The Council is also disappointed not to have had the opportunity to review and provide comments on the Draft Preliminary Environmental Information Report (PEIR) or other key details including the proposed pylon route, the location of the battery storage facility, the precise siting of solar panels within each parcel, and the approach to screening in advance of the Statutory Consultation. The absence of this information has constrained officers’ ability to offer meaningful input at a formative stage, and to collaborate with the applicants to explore opportunities for design and mitigation to optimise the outcomes from the project.

Next Steps

14. The Council considers that both in the pre-application process leading up to the formal consultation and through the limited engagement and information sharing to date, the applicant’s pre-application process is inadequate for a project of this significance and impact and falls short of the requirements outlined in the Government’s *Guidance on the pre-application stage for Nationally Significant Infrastructure Projects* and *National Policy Statements EN-1 and EN-3*.
15. The officer commentary on the consultation material attached to this letter makes clear that further information and engagement with the Council is required if the proposal is to fulfil the objectives set out in the Overarching National Policy Statement for Energy (EN-1), the National Policy Statement for Renewable Energy Infrastructure (EN-3), and the requirements of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (as amended). Without such engagement, there is a significant risk that the consultation process will fail to meet national policy expectations for front-loaded and collaborative engagement, resulting in critical

issues being addressed too late in the process to meaningfully influence the design or mitigation strategy.

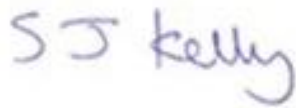
16. In addition to the points set out above, the Council has prepared a table of officer comments on each topic area, appended to this response. The attached table aims to provide further clarification of the Council's position based upon the information to date and identifies specific matters that the applicant should address with the objective of enabling constructive engagement and the effective mitigation of the project's impacts.
17. The Council requests that these comments are given full consideration as part of the Statutory Consultation process.

South Cambridgeshire District Council's Current Position

18. Given the limited detail provided, the omissions and errors in the consultation material identified and the inadequate engagement to date, the Council is not currently in a position to determine whether the proposals are acceptable having regard to the Overarching National Policy Statement for Energy (EN-1), the National Policy Statement for Renewable Energy Infrastructure (EN-3), and the relevant objectives of the National Planning Policy Framework (NPPF). In particular, the proposals fail to demonstrate compliance with the assessment principles set out in Part 4.2 of EN-1, which require early consideration of alternatives and effective engagement to inform good design and mitigation.
19. The Council considers that responsibility rests with the Applicant to provide sufficient information, as detailed in the appended table of responses and to engage meaningfully with the Council and other stakeholders to fully explore the impacts and mitigate where possible in order to address the outstanding issues before submission of the DCO application. This includes demonstrating how the proposals have been shaped through engagement and consultation to satisfy the requirements of EN-3 (Part 2.10) to minimise adverse landscape, visual, and cumulative impacts, and to secure appropriate mitigation through design.
20. In addition, the Council requests a fuller understanding of, and a more active role in shaping, the proposed *Community Benefit Fund*. As a key mechanism for ensuring that local communities directly affected by the scheme are fairly compensated and that benefits are distributed transparently and equitably, the Fund's structure, governance, and scope need to be developed in consultation with the Council and local representatives if the fund is to be successful.
21. The Council recognises the importance given by the Government to the expansion of renewable energy generation. The proposals have the potential to supply a significant number of homes and workspaces with renewable electricity. However, based on Government guidance and the principles of early and effective consultation in EN-1

and EN-3, the shortcomings in the process to date mean that alongside the omission of important information concerning the schemes development and the assessment of its impacts, it is not possible to conclude that the balance of impacts and benefits from the scheme justify support for this proposal. The Council has raised these concerns with the applicant earlier in the process and they have not been resolved. Accordingly, the Council has no option but to object to the proposals at this time.

Yours faithfully



Stephen Kelly

Director of Planning & Economic Development

On behalf of: South Cambridgeshire District Council

Encl. Table 1: Response to Statutory Consultation (SC-1)

Application by Downing Renewable Developments for an Order Granting Development Consent for the Kingsway Solar Project (PINS ref: EN010165)

TABLE 1: Response to Phase One Statutory Consultation (SC-1)

Technical area/Topic	Comments
<p>1. Grid Connection</p>	<p>General Comments</p> <p>The Kingsway Solar project is contingent upon a separate National Grid application for the proposed Burwell South Substation. This application remains at an early pre-application stage, with its specific location and delivery timeline yet to be confirmed.</p> <p>Without this grid connection, the Kingsway Solar project would have no access to the National Grid and therefore could not be delivered. In addition, given the competing demands from several other nearby solar developments also seeking grid connections, South Cambridgeshire District Council, herein referred to as ‘SCDC’ or ‘the Council’, has significant concerns regarding the overall deliverability of the Kingsway Solar project and the sufficiency of capacity at the Burwell South Substation to accommodate all proposed developments.</p> <p>SCDC supports the position set out by the Planning Inspectorate (PINS) in the adopted Scoping Opinion dated 23 January 2025¹, which states that details of the grid connection must be provided at the submission stage of the Development Consent Order (DCO). As set out in the Scoping Opinion, the</p>

¹ <https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010165-000025-EN010165%20-%20Kingsway%20Solar%20-%20Scoping%20Opinion.pdf>

	<p>Environmental Statement (ES) should clearly describe the relationship between the Kingsway Solar project and any other connected or dependent projects.</p> <p>This should include:</p> <ul style="list-style-type: none"> • The extent to which the Kingsway Solar project is dependent on the delivery of the grid connection and any related infrastructure; • The anticipated development timelines and consenting routes for the grid connection and associated projects; and • A clear explanation of how these elements will be coordinated to ensure deliverability. <p>Furthermore, cumulative effects arising from the grid connection and other relevant projects must be fully assessed within the ES to provide transparency and enable an informed assessment of the project's overall impacts.</p> <p>Summary of Requirements: SCDC consider that the Applicant should:</p> <ol style="list-style-type: none"> 1. Provide full details of the grid connection, including its route, design, and delivery timeline, within the DCO submission; 2. Clarify the interdependencies between the Kingsway Solar project and any associated or connected infrastructure; and 3. Undertake a robust cumulative impact assessment encompassing the grid connection and all relevant nearby projects. <p>Until this information is provided, SCDC does not consider that the project's deliverability or cumulative impacts have been adequately demonstrated.</p>
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<p>2. Pylon Route and Photovoltaic Panels (General Comments)</p>	<p>General comments</p> <p>It is noted that the eastern corridor has been selected as the route for the overhead powerlines, comprising pylons approximately 50–65 metres in height, connecting the Kingsway Solar project to the proposed Burwell South Substation, located approximately 15 kilometres from the sites where the Photovoltaic (PV) panels will be located.</p> <p>The Council was not made aware of this element of the proposal until the commencement of the Statutory Consultation. The proposals will give rise to significant impacts upon the landscape and its assets. Given that it has not been possible to understand through such engagement the decisions that have led to this specific route selection and design, or to explore less impactful routes or mitigation proposals, the Council cannot conclude that the proposals satisfy National Policy Statement EN-1 (Part 4.5: Good Design) and EN-3 (Paragraph 2.55–2.58: Landscape and Visual Considerations), or with Paragraph 187 of the National Planning Policy Framework (NPPF), which requires applicants to ensure that new development is sympathetic to local character and landscape setting.</p>
<p>3. Biodiversity and Habitats</p>	<p>General Comments</p> <p><u>Statutory Protected Sites</u></p> <p>SCDC considers that the statutory protected sites likely to be impacted by the proposals are as follows:</p> <ul style="list-style-type: none"> • Balsham Woods Site of Special Scientific Interest (SSSI) • Carlton Woods SSSI • Fleam Dyke SSSI • The Roman Road SSSI • Park Wood SSSI (outside of district boundary)

All of the above statutory protected sites fall within 2 km of the proposed development area and will require further consideration as part of a comprehensive pre-application process.

Non-statutory protected sites to be impacted

The following non-statutory protected sites are located within 2 km of the proposals and may also be impacted:

- Carlton Lane County Wildlife Site (CWS)
- Great Coven's Wood and Lower Wood CWS
- Hill Crofts CWS
- Leys Wood CWS
- Lopham's Wood CWS
- Old Cambridge Road Verges CWS
- Rand's Wood CWS
- Signal Hill Plantation Grassland CWS
- West Wratting Valley Farm Roadside Verge CWS
- Whiting's Grove CWS
- Worsted Lodge Roadside Verge CWS
- Binkley Wood CWS (outside of district boundary*)
- Ladies Grove and Hay Wood CWS (outside of district boundary*)
- Binkley Hall Veteran Trees CWS (outside of district boundary*)

** Please note: County Wildlife Site data outside of the SCDC boundary is based on 2020 datasets and may have been subject to amendment since that time.*

Protected and priority species that maybe impacted

- Great crested newt

- Barn owl
- Skylark
- Farmland birds (including grey partridge, corn bunting, turtle dove, and yellow hammer)
- Arable weeds
- Invertebrates
- Reptiles
- Bats, including western barbastelle
- Brown hare
- Badger
- Water vole
- Harvest mouse
- Polecat
- Hedgehog

Biodiversity Net Gain

- Biodiversity Net Gain (BNG) will be required under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021).
- As part of the emerging Greater Cambridge Local Plan, SCDC expects the proposals to deliver at least 20% BNG, including all habitat units, linear units, and river habitat units.
- SCDC supports BNG delivery either on-site, off-site, or through a combination of both.
- All BNG should be secured for a period of 30 years through a Section 106 agreement.

Comments on the Preliminary Environmental Information Report (PEIR)

PEIR Volume 2; Chapter 6; Paragraph 6.6.10 - Hedgerow and Tree Removal During Construction

	<p>The PEIR describes hedgerow and tree removal impacts as “temporary”. However, there is no assessment of the timeframe for reinstatement or the period required for hedgerows and trees to return to pre-development condition. This recovery period will be significant and variable and must be considered within the assessment.</p> <p><u>PEIR Volume 2; Chapter 6; Paragraph 6.6.18 – Impacts to badgers during construction.</u></p> <p>The PEIR states that no main setts are located within 50 m of development land. It is unclear whether this includes haul roads, where increased traffic, air and noise pollution, and ground vibration during construction may cause disturbance. This requires clarification and, if necessary, reassessment.</p> <p><u>PEIR Volume 2; Chapter 6; Paragraph 6.6.48-49 – Impacts to skylarks and other ground nesting birds.</u></p> <p>No assessment has been provided on the duration, significance, or magnitude of impacts on ground-nesting birds. Although skylark plots are proposed, there is no analysis of their effectiveness or feasibility given the likely presence of established territories. Similarly, no mitigation has been proposed for lapwing, grey partridge, or quail. This represents a significant gap in the ecological assessment. For example, given the surrounding landscape, there are likely to be adjacent skylark territories to those that will be lost, meaning that providing meaningful mitigation through skylark plots could be problematic if there are already established territories. Grey partridge relies on a variety of food sources throughout their lifetime, requiring a combination of invert (chick) and vegetative (adult) resources. Clarity is required on what mitigation will be in place to provide such resources.</p> <p>SCDC recommend that ground nesting birds are separated from the general breeding bird's data analysis and analysed as an independent receptor. This will likely provide a very different outcome in terms of magnitude of impact, and then specific mitigation can be designed into the scheme to reduce it. The current information does not provide confidence that the impacts to ground-nesting birds are acceptable or will be effectively mitigated.</p>
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	<p>Summary of Requirements</p> <p>SCDC considers that the current information provided is inadequate and requires the Applicant to:</p> <ol style="list-style-type: none"> 1. Provide a detailed assessment of all statutory and non-statutory protected sites within 2 km of the proposed development, including site-specific impact evaluations and mitigation measures; 2. Update ecological surveys to ensure all protected and priority species are adequately assessed, with particular focus on ground-nesting birds and their breeding habitats; 3. Clearly define hedgerow and tree reinstatement timelines and include this within the impact assessment methodology; 4. Reassess construction-phase impacts on badgers, including haul roads and temporary disturbance factors; 5. Treat ground-nesting birds as a distinct receptor within the ecological impact assessment and provide appropriate mitigation; 6. Commit to delivering at least 20% Biodiversity Net Gain in line with Greater Cambridge policy expectations; and 7. Secure BNG measures for a minimum of 30 years through a Section 106 agreement. <p>Until these matters are addressed and the necessary ecological information is provided, SCDC does not consider that the Applicant has demonstrated that the impacts on biodiversity and protected habitats can be fully understood or acceptably mitigated. The proposal has therefore failed to demonstrate that the ecological impacts of the proposed development have been identified and that any potential adverse effects have been addressed in the schemes design and mitigation.</p>
<p>4. Landscape and Visual</p>	<p>Landscape and Visual Impact Assessment (LVIA) The Council considers that the Landscape and Visual Impact Assessment (LVIA) is not complete. Accordingly, it is not clear how the LVIA is being used to inform design of the site and panel layouts. The Illustrative Masterplan nevertheless appears to be at an advanced stage.</p>

In accordance with National Policy Statement EN-1 (Part 4.5 – “Good Design”) and EN-3 (Part 2.10.15–2.10.20 – “Landscape and Visual”), applicants are expected to demonstrate that the design process has been informed by early and iterative assessment of landscape and visual effects, and that opportunities to mitigate harm through siting, scale, and layout have been fully explored. The Council does not consider that this requirement has yet been met.

T LVIA and Heritage Impact Assessment (HIA) should be developed together and with input from the landscape and heritage teams of the Local Authority so that viewpoints and the consideration of sensitive receptors might help shape the schemes development positively.

Comments on the Preliminary Environmental Information Report (PEIR)

Grid Connection Corridor / Pylon Route Selection

PEIR Volume 1; Chapter 4; Paragraph 4.3.18

The Council has significant concerns regarding the decision to utilise the eastern connection corridor. The potential impacts on users of Newmarket Racecourse and the historic Devil’s Dyke do not appear to have been fully assessed. Both the Rowley Mile and July Courses at Newmarket Racecourse should be identified as receptor for the LVIA and must be considered when assessing the pylon corridor routes. The requirement for the pylon route to cross the Dyke close to the A14, and to run roughly parallel to it, may result in a visually intrusive feature that is highly visible from the racecourse and land to its north.

In the absence of completed LVIA and HIA, the Council’s preliminary view is that the western corridor may have offered an opportunity to avoid or substantially reduce these impacts, and while the potential for coalescence with other pylon routes is recognised, the overall effect on visual receptors requires further investigation. Additional evidence and justification for the selection of the eastern route is therefore required.

PEIR Volume 1; Chapter 4; Paragraph 4.3.42

This section provides additional guidance information relating to the Holford Rules. The first three bullet points refer to areas of high amenity value, while the sixth bullet point highlights the need for a collaborative approach to route selection. Although the Applicant has consulted with National Grid, consultation has not been undertaken with the Council who possess valuable local landscape and visual knowledge that could inform the process. Further work is required to clarify how the selected approach can be mitigated for local receptors, and how local knowledge has been incorporated into route selection and design.

Design Parameters and Mitigation

PEIR Volume 2; Chapter 7; Paragraph 7.4.3: First Bullet

The Council notes that the proposed maximum panel height has increased from 3.5 m (as presented during non-statutory consultation) to 4.2 m. This represents a notable and currently unjustified increase and is considered a significant height for development with additional harm to a rural landscape. Further explanation is requested to justify this alteration.

PEIR Volume 2; Chapter 7; Paragraph 7.4.3: Second Bullet

Further clarification is required regarding exclusion zones proposed near residential properties. Details should be provided on the extent, function, and design of these zones.

PEIR Volume 2; Chapter 7; Paragraph 7.4.3: Fourth Bullet

The mitigation wording - "All existing vegetation within and adjacent to the Site and not directly affected by the Scheme..." - is not supported. This phrasing suggests that vegetation affected by the Scheme may be removed. Existing vegetation should first be regarded as a constraint to development, with removal only considered as a last resort, not as a default position. We recommend the wording is amended to ensure that ALL vegetation and trees are protected except where explicitly defined and approved through the review process.

PEIR Volume 2; Chapter 7; Paragraph 7.4.3: Sixth Bullet

Proposals for offsetting should be informed by detailed tree survey data to ensure appropriate mitigation and landscape integration.

PEIR Volume 2; Chapter 7; Paragraph 7.4.3: Seventh Bullet

The commitment to retain field patterns “where practicable” is not supported. The retention of field patterns delineated by hedgerows, trees, or topographical features should be treated as a design principle rather than a conditional aspiration.

PEIR Volume 2; Chapter 7; Paragraph 7.4.3 – Fifteenth Bullet

The timeline for reinstatement planting should specify implementation in the first planting season (October to March) following the completion of construction, rather than using the less precise wording “as soon as practicable.”

PEIR Volume 2; Chapter 7; Paragraph 7.4.3: Twentieth Bullet

Reinstatement planting should not prejudice the long-term restoration of the land to its existing use or landscape pattern following the decommissioning of the solar farm.

General Observations

All instances of “Devils Ditch” should be corrected to “Devil’s Dyke.”

The On-Site Substation Location as shown on the Illustrative Masterplan adjacent to the existing wind farm near CamGrain has been located in an area which is away from residential properties, but it is nearing the crest of the hill. The ZTV suggests it would be quite visible, and it is unknown if other less intrusive locations were considered. More details on the expected scale, mass and materiality of the On-Site Substation must be provided to ensure that visual impact assessments can be made.

The other smaller substations require more detail in order to assess their impact in their locations as shown on the Illustrative Masterplan

PEIR Volume 2; Chapter 7; Paragraph 7.5.3: Visual Receptors

Users of Newmarket Racecourse, including both the July Course and Rowley Mile stands, must be explicitly recognised as key visual receptors. This is a nationally significant recreational venue, and the viewing direction of spectators (towards the north and northwest) coincides with part of the proposed connection corridor. Consequently, the sensitivity and importance of these visual receptors are considered to be high.

Landscape and Visual Impact Assessment (LVIA) Photography Baseline

- View 7 appears to be oriented south/southwest, rather than north. The location and direction of the viewpoint should be verified, as features such as telephone poles and horse fencing suggest an error.
- View 32 does not appear to correspond accurately with the mapped location. Clarification is required.
- View 38 appears to be looking southeast, not northwest. A series of dynamic viewpoints from Devil's Dyke, where it crosses the A1304, should be included, showing views in both directions.

General Comments

The Council notes that the Landscape and Visual Impact Assessment (LVIA) identifies impacts on both landscape and visual receptors as ranging from Major to Moderate Adverse. The designation of these impacts as “temporary” is questioned. Given the 40-year operational lifespan of the proposed development, these impacts are, in effect, long-term or quasi-permanent. Assessments should instead reflect the true duration and permanence of the effects experienced.

Summary of Requirements

In order for the Council to reach a definitive conclusion on the extent to which the proposals satisfactorily engage with the matter of landscape and visual impacts, further engagement and information is required from the applicant to:

1. Justify the selection of the eastern grid connection corridor, including detailed comparative analysis with the western option, supported by visual evidence and assessment of effects on Newmarket Racecourse and Devil's Dyke;
2. Demonstrate compliance with the Holford Rules, particularly in relation to avoidance of high-amenity landscapes and collaborative route planning;
3. Engage directly with the Council incorporate local landscape knowledge and ensure design sensitivity;
4. Provide justification for the increased panel height (4.2 m), with supporting visualisations;
5. Clarify exclusion zones near residential receptors, including their extent, purpose, and mitigation value;
6. Strengthen vegetation protection measures, ensuring that existing trees and hedgerows are treated as design constraints;
7. Provide detailed tree survey data to underpin offsetting and planting proposals;
8. Reinstate a design principle to retain existing field patterns rather than treating them as conditional features;
9. Specify reinstatement planting timelines as the first planting season post-construction (October–March);
10. Ensure reinstatement planting supports long-term restoration of landscape character following decommissioning;
11. Correct all references from “Devils Ditch” to “Devil’s Dyke”;
12. Identify Newmarket Racecourse (both courses) as key visual receptors with high sensitivity;
13. Correct errors in LVIA viewpoint mapping and orientation, and include additional dynamic views from Devil’s Dyke and A1304; and
14. Reassess impact duration terminology, acknowledging that effects over a 40-year period should be treated as long-term.

Until these matters are addressed, the Council does not consider that the LVIA or associated landscape and visual assessments provide a sufficiently robust or transparent basis for assessing the full landscape and visual impacts of the proposed development.

<p>5. Historic Environment – Built Heritage</p>	<p>Comments on the Preliminary Environmental Information Report (PEIR)</p> <p><u>PEIR Volume 2; Chapter 8; Paragraph 8.2.1 Study Area</u></p> <p>The Council considers that the reduction of the built heritage study area to 1 km, as stated in paragraph 8.2.1 of the PEIR is not adequately justified.</p> <p>The Scoping Report submitted to the Planning Inspectorate (PINS) originally identified a 2 km study area, intended only as a preliminary baseline to support further engagement and the inclusion of additional assets identified through Zone of Theoretical Visibility (ZTV) and Cambridgeshire Historic Environment Record (CHER) mapping. The Council raised concerns at the scoping stage regarding the potential for visual impacts extending beyond 2–3 km.</p> <p>Paragraph 8.2.1 of the PEIR refers to the use of a combined ZTV to define the reduced study area. If this refers to Figure 7.12 – Screened ZTV Combined Scheme, it does not support a 1 km limit, as it indicates visibility extending well beyond 3 km (the full extent not being mapped). No ZTV/CHER overlay is included within the PEIR, and built heritage assets beyond 1 km are not mapped, meaning potential receptors have likely been omitted.</p> <p><u>PEIR Volume 2; Chapter 8B - Non-Technical Summary</u></p> <p>There is an inconsistency between documents. The Non-Technical Summary cites a 2 km study area, whereas Volume 2, Chapter 8B adopts a 1 km extent.</p> <p><u>PEIR Volume 2; Chapter 8; Paragraph 8.2.2 - Baseline Characterisation & PEIR Volume 4, Appendix 8a.3 - Built Heritage Baseline.</u></p>
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While paragraph 8.2.2 acknowledges that the current document is preliminary, the Council has concerns regarding the identification of receptors and the accuracy of sensitivity assessments in Volume 4, Appendix 8a.3 (Built Heritage Baseline).

Key issues include:

1. Exclusion of Assets

The 1 km boundary omits key receptors visible in the Landscape and Visual Impact Assessment (LVIA). For instance, Figure 7.13 includes Viewpoint 13 adjacent to West Wickham Conservation Area, which is excluded from the built heritage study area. Similarly, the Balsham Conservation Area and Grade I listed Holy Trinity Church are largely excluded despite likely intervisibility.

2. Inconsistency with LVIA Findings

The LVIA (which uses a 3 km study area) identifies potentially significant effects across public rights of way, community access routes, and views around Balsham, which are not reflected in the built heritage assessment.

3. Area C Assessment Discrepancies

The PEIR identifies non-significant effects for most heritage assets in Area C, contrasting sharply with significant LVIA effects in the same area. This discrepancy raises doubts about the adequacy of receptor sensitivity ratings and overall consistency.

4. Inaccurate Descriptions

*Grade II St Andrew's Church, West Wrattling** is described as being surrounded by mature trees that screen open views. This is incorrect; the church occupies a rise with expansive views of open countryside, confirmed through site observation and corroborated by the church's own description.

5. Assessment Group Rationale

The rationale for grouping some heritage receptors, including those within West Wrattling, is unclear and requires clarification.

PEIR Volume 4; Appendix 8a.3, Section 1.3

The aspects listed under Volume 4, Appendix 8a.3, Section 1.3 should be fully integrated into the detailed built heritage assessment to ensure a robust evaluation of potential impacts.

The Council recommends that the Heritage Impact Assessment and LVIA are undertaken in parallel, informing one another to ensure consistency in assessing visual and setting-related effects. Appropriate visualisations will be essential to demonstrate potential impacts on the historic character of the area and to show how mitigation measures may reduce harm to heritage significance.

SCDC has concerns that the proposed mitigation (Section 8.3) remains vague and heavily caveated. Paragraphs 8.8.1 - 8.8.4 propose engagement with heritage stakeholders to establish a proportionate baseline; however, no engagement has yet taken place with the Council's conservation officers

Other Observations

Guidance Documents (8.1.2)

- Volume 4, Appendix 8a.4 does not provide any of the referenced guidance or good practice documents. Although Volume 2, Chapter 8B, paragraph 8.2.9 references GPA2, GPA3, and HEAN12, there is no mention of HEAN15: Commercial Renewable Energy Development and the Historic Environment, which is directly relevant to this project and should be included.

Mapping Accuracy:

- Figure 7.15: The plan should refer to West Wickham, not "Weston Wickham."
- Volume 3, Figures 2.4–2.6 ("Environmental Sensitivities – Historic") the use of coloured mapping obscures asset symbols. The Council requests that greyscale basemaps are used to improve clarity and legibility.

Summary of Requirements

	<p>The Council is of the view that in order for the impacts of the proposals to be properly assessed as part of the forthcoming DCO process, the application materials need to :</p> <ol style="list-style-type: none"> 1. Reinstate a minimum 2 km study area for the built heritage assessment, with further inclusion of assets up to 3 km where ZTV or LVIA analysis demonstrates potential intervisibility; 2. Provide a ZTV/CHER overlay clearly showing all identified heritage receptors within the agreed study area; 3. Review and correct inaccuracies in baseline data, included references to St Andrew's Church, West Wrattling, and other misdescribed assets; 4. Ensure the Heritage Impact Assessment and LVIA are developed in parallel, with cross-referencing of findings and consistent assessment of setting and visual impacts; 5. Provide appropriate visualisations to illustrate potential effects and inform mitigation, to be agreed with the Council in advance to ensure that the scope, format, and viewpoints are suitable for assessing and illustrating likely landscape and visual impacts; 6. Update and include all relevant Historic England guidance, including HEAN15, within the methodology; 7. Engage with the Council's Conservation Officers and other relevant stakeholders at the earliest opportunity and prior to formal submission of the DCO to agree the scope and baseline approach; and 8. Amend mapping and figures to ensure accuracy and clarity, correcting any naming errors and improving visibility of asset data. <p>Until these matters are addressed, the Council does not consider that the built heritage baseline or assessment within the PEIR provides a sufficiently robust or reliable foundation for determining the scheme's likely effects on the historic environment.</p>
<p>6. Trees</p>	<p>Comments on the Preliminary Environmental Information Report (PEIR)</p> <p>All areas proposed for development lie within a network of agricultural fields, many of which are defined by established hedgerows. These hedgerows may be protected under the Hedgerow Regulations 1997 and</p>

could qualify as Important Hedgerows under those criteria. Insufficient detail has been provided to confirm which, if any, hedgerows are likely to be affected or removed as part of the proposals.

Satellite imagery indicates the presence of pockets of trees and small wooded areas within the proposed development boundary. In addition, individual trees are likely to be present within established hedgerows and along roadsides or near settlements, where they may contribute to public amenity and local landscape character.

The Council considers that a Tree Constraints Plan and a comprehensive Arboricultural Impact Assessment (AIA) should be prepared to accurately identify existing tree and hedgerow features, assess potential impacts, and inform appropriate mitigation or retention strategies. These documents should accompany the Environmental Statement (ES) to ensure compliance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, the National Policy Statements EN-1 and EN-3, and the relevant provisions of the National Planning Policy Framework (NPPF) - notably paragraphs 131 and 180, which emphasise the protection and enhancement of trees, woodlands, and biodiversity.

Summary of Requirements

The Council considers that a full and appropriate assessment of the impact of the development on Trees requires further information from the applicant:

1. A Tree Constraints Plan clearly identifying all existing trees, hedgerows, and woodland features within and adjacent to the site;
2. A full Arboricultural Impact Assessment (AIA) in accordance with BS 5837:2012 (“Trees in relation to design, demolition and construction - Recommendations”);
3. Identify all Important Hedgerows under the Hedgerow Regulations 1997, confirming which are proposed for retention or removal; and

	<p>4. Include within the Environmental Statement a tree and hedgerow mitigation strategy, detailing protection measures during construction and proposals for replacement or compensatory planting where loss is unavoidable.</p>
<p>7. Health and Wellbeing</p>	<p>General Comments</p> <p>In response to the Non-Statutory Consultation (NSC1), the Council raised concerns regarding potential disruption to access to services within the Minor Rural Centres, which provide key amenities for local residents. SCDC specifically requested that proactive consultation be undertaken with identified vulnerable groups, extending beyond passive methods such as leaflet distribution and village hall presentations. However, no evidence has been found of this more proactive and inclusive form of engagement</p> <p>The Greater Cambridge Health Impact Assessment Supplementary Planning Document 2025² provides clear guidance on how health and wellbeing considerations should be addressed in major development proposals. This SPD should be referenced or integrated within the Statement of Community Engagement when undertaking the Health Impact Assessment (HIA) to ensure alignment with local policy expectations.</p> <p>Comments on the Preliminary Environmental Information Report (PEIR)</p> <p>The Council also raise concerns regarding the potential fire risk associated with the Battery Energy Storage System (BESS). No reference to this issue has been identified within the statutory consultation materials. While the proposed location of the BESS appears to be set back from residential areas, risk remains in relation to the potential contamination of nearby watercourses, which are abundant in this area.</p> <p>During NSC1 consultation, it was also suggested that the Applicant, in collaboration with the Council and local communities, should consider establishing a Community Fund to help mitigate any adverse impacts of the development on local residents. No further reference to this proposal has been found within the statutory consultation documentation.</p>

² https://www.scambs.gov.uk/media/c4ccvtx/greater_cambridge_hia_spd_adoption_2025.pdf

	<p>SCDC do however welcome the acknowledgement within the consultation that mental health impacts have been considered and that the HIA will address both mental and physical health effects, alongside wider determinants of wellbeing.</p> <p>Given the recent rapid expansion of solar farm development across rural areas, there is a valuable opportunity to investigate the longer-term effects on human health and wellbeing. While the environmental benefits of renewable energy generation are well recognised, there is limited understanding of how large-scale solar infrastructure may influence local communities.</p> <p>This application, if progressed, provides an opportunity to initiate monitoring and evaluation of such impacts, which could in turn inform future public health responses and planning policy. A longitudinal study would be particularly beneficial in assessing both risks and benefits over time, ensuring that the transition to clean energy and environmental sustainability also delivers positive outcomes for community health and wellbeing.</p> <p>Summary of Requirements SCDC considers that the Applicant should:</p> <ol style="list-style-type: none"> 1. Demonstrate that proactive engagement with vulnerable groups has been undertaken, beyond standard consultation methods; 2. Reference and integrate the Greater Cambridge Health Impact Assessment SPD 2025 within the Statement of Community Engagement and the forthcoming Health Impact Assessment (HIA); 3. Provide clear evidence that fire risk associated with the BESS has been considered, including potential pathways for contamination of watercourses; 4. Revisit the proposal for a Community Fund, in collaboration with local authorities and affected communities, to mitigate potential local impacts; and 5. Explore opportunities for long-term monitoring and research into the health and wellbeing impacts of large-scale solar developments, including the potential establishment of a longitudinal study.
<p>8. Communities</p>	<p>General comments - Consultation</p> <p>SCDC note that the comments previously submitted on the applicants earlier Statement of Community Consultation (SoCC) have not resulted in any material changes to the Statutory Consultation approach.</p>

SCDC raise concern that this may result in a less effective consultation process, potentially failing to identify key issues at an early stage, which could have implications for the project's design and delivery later in the process.

As outlined in the Council's response to the draft SoCC, SCDC considers that four consultation events were insufficient for a project of this scale, with no online or hybrid options or clear accessibility information provided. This may have limited participation, particularly for those in remote areas or with mobility or caring responsibilities. There is also no evidence of targeted engagement with children, young people, or seldom-heard groups identified in the SoCC. While materials were distributed to schools and parish councils, this alone is unlikely to have secured meaningful input. SCDC recommends more inclusive and targeted engagement, which the Council would be willing to support.

Mitigation and Community Benefit

SCDC notes that while the Statutory Consultation materials refer to a potential Community Benefit Fund, no meaningful engagement has taken place with the Council on this matter. Given the Council's statutory role in representing local communities, this omission is considered inappropriate and inconsistent with the expectations for early and collaborative engagement set out in the Government's Guidance on the Pre-Application Stage for Nationally Significant Infrastructure Projects and National Policy Statements EN-1 and EN-3.

At present, the consultation provides very limited information on either the proposed structure or purpose of the Fund. It also remains unclear how the applicant intends to differentiate between mitigation measures, which are required to address the direct and residual impacts of the project, and any voluntary community benefits intended to deliver wider value. This lack of clarity, combined with the absence of early dialogue, has constrained the Council's ability to contribute meaningfully to the development of a fair and locally responsive approach.

	<p>The Council's position is that:</p> <ul style="list-style-type: none"> • Mitigation measures - such as landscape treatment, biodiversity enhancement, and transport or access improvements - must form an integral part of the project design and consent process, in accordance with national policy, rather than being delivered through a discretionary community benefit mechanism; and • Any Community Benefit Fund should be additional to these requirements and designed to deliver long-term social, environmental, and economic value for communities most directly affected by the scheme. <p>SCDC would expect to work collaboratively with the applicant, the host local authorities, and relevant community partners to develop transparent and accountable governance arrangements for any such fund. Local communities must have a meaningful role in decision-making, ensuring that benefits are aligned with local priorities and that unspent funds remain available for community use.</p> <p>Given the lack of early engagement and the absence of a clear framework at this stage, the Council cannot conclude that the applicant's approach to mitigation or community benefit currently meets national policy expectations. This area therefore requires further detailed dialogue with the applicant, Members, and the Council's Communities Team to establish an appropriate structure and ensure that any benefits are genuinely proportionate, locally relevant, and secured in addition to required mitigation.</p>
<p>9. Noise and Vibration</p>	<p>Comments on the Preliminary Environmental Information Report (PEIR)</p> <p><u>PEIR Volume 2; Chapter 12</u></p>

The Council's Environmental Health have reviewed the submitted assessment and are generally satisfied with the statements provided within the Noise and Vibration chapter of the Preliminary Environmental Information Report (PEIR).

SCDC reiterates that, in relation to operational noise, reliance solely on BS 4142:2014 to determine impacts on sensitive receptors is insufficient. The Council previously advised that the assessment should also include analysis of predicted third-octave bands, in accordance with guidance such as NANR45, to ensure that low-frequency noise is properly evaluated and is unlikely to cause disturbance.

This recommendation was discussed directly with the Applicant's noise consultant during a meeting held on 29 July 2025. This matter is referenced within the submitted documentation, and both authorities raised concerns that low-frequency noise requires specific consideration beyond the BS 4142 methodology.

Upon review of Chapter 12 of PEIR, the SCDC notes paragraph 12.5.7, which states:

“As discussed above, the primary noise generating plant and equipment (the BESS, substation and inverter equipment) are located more than 300m from residential receptors. Therefore, this equipment is outside of the operational noise study area, and no significant noise effects are anticipated.”

Whilst the Council appreciates that there may be some difficulty in absolute compliance (NANR45 is an internal measurement and therefore dependent on the property and how it was constructed), at the meeting on the 29th July, the Council's Environmental Health Officer were advised by the applicant's acoustician that they would be able to provide some detail of potential impact based on assumptions of construction of identified sensitive receptors.

However, the chapter submitted seems to suggest that the applicant is not looking to consider low frequency noise but is relying on distance attenuation instead.

	<p>SCDC considers this to be inadequate for the following reasons:</p> <ul style="list-style-type: none"> • It was previously agreed that low-frequency noise would be considered within the assessment; and • Low-frequency noise can travel considerable distances, and therefore exclusion of such assessment based on distance alone is not supported by best practice guidance. <p>Summary of Requirements:</p> <p>SCDC considers that the applicants assessment requires further development including:</p> <ol style="list-style-type: none"> 1. Undertake an assessment of low-frequency noise in accordance with NANR45 (or equivalent recognised methodology); 2. Provide an assessment of potential impacts on sensitive receptors using third-octave band predictions; and 3. Amend the Noise and Vibration chapter to reflect these requirements and the discussions held at the meeting of 29 July 2025. <p>Until these matters are addressed, the operational noise assessment cannot be considered complete or robust.</p>
<p>10. Air Quality</p>	<p>Comments on the Preliminary Environmental Information Report (PEIR)</p> <p><u>PEIR Volume 2; Chapter 13; Paragraph 13.3.2</u></p> <p>The Applicant makes reference to the <i>Cambridge City Air Quality Management Area (AQMA)</i>. This information is out of date, as the Cambridge City AQMA was revoked in January 2025. The Environmental Statement (ES) should be updated to reflect this change and ensure all assessments are based on the most current policy and designation context.</p> <p><u>PEIR Volume 2; Chapter 13; Paragraph 13.3.4</u></p>

The Applicant states that SCDC does not undertake PM₁₀ or PM_{2.5} monitoring. This statement is incorrect. SCDC actively monitors both pollutants at three locations across the district, as detailed in the Council's Annual Status Report (ASR). This data provides an important evidence base and must be used to inform baseline air quality conditions within the assessment.

SCDC's 2025 Annual Status Report is now publicly available on the Council's website³, and SCDC consider therefore that the baseline data within the ES be updated using the most recent monitoring results.

General Comments:

- SCDC broadly agrees with the Applicant's methodology and the use of appropriate technical guidance, including the procedures for assessing construction dust impacts.
- The preliminary assessment of likely significant environmental effects on air quality is also generally supported.
- However, to ensure transparency and proper understanding of the assessment's scope, a map clearly identifying the air quality receptor locations must be included within the submission.

Summary of Requirements:

SCDC considers that the applicant should:

1. Update all references to reflect the revocation of the Cambridge City AQMA (January 2025).
2. Revise the baseline air quality assessment using the latest SCDC monitoring data from the 2025 Annual Status Report.
3. Provide a detailed map of receptor locations to accompany the air quality assessment.

³ <https://www.scambs.gov.uk/media/1wdb3dp/air25880822-south-cambridgeshire-district-council-asr-2025-v70.pdf>

	<p>Until these updates have been made, the Air Quality chapter cannot be considered robust or fully compliant with current local evidence and policy context.</p>
<p>11. Climate and Carbon</p>	<p>Comments on the Preliminary Environmental Information Report (PEIR)</p> <p>The PEIR considers two separate impact areas within the climate change section:</p> <ol style="list-style-type: none"> 1. Greenhouse Gas (GHG) emissions, relating to the release of emissions into the atmosphere; and 2. Climate Change Resilience and Adaptation (CCRA), addressing the vulnerability of the scheme to future climatic conditions. <p>Both aspects will be carried through the Environmental Impact Assessment (EIA) and Environmental Statement (ES) to ensure they are adequately addressed.</p> <p>Greenhouse Gas Emissions</p> <p><u>PEIR Volume 2; Chapter 15</u></p> <p>The baseline for the greenhouse gas assessment has been developed using appropriate data sources and takes account of both the emissions associated with the current agricultural land use and the carbon sequestration potential of the existing landscape. Baseline emissions are estimated to be approximately 831 tCO₂e per year.</p> <p>The proposed development itself is expected to result in minimal direct emissions, primarily associated with the construction phase, which the Applicant has indicated will be managed appropriately.</p> <p>A number of comparable solar schemes are currently progressing through the Development Consent Order (DCO) process, although relatively few have been approved to date. In this context, the 2022 Energy Security Strategy set out a national commitment to accelerate and increase solar power capacity by up to fivefold — from 14 GW to 70 GW by 2035. The Kingsway Solar Farm would therefore contribute to</p>

achieving this strategic objective. In the absence of such renewable energy development, electricity generation from gas-fired power stations would likely form the alternative means of supply.

An alternative comparative baseline has therefore been developed, based on the generation of electricity from gas-fired power stations, representing the most probable scenario should the proposed development not proceed. This comparative scenario is estimated to generate approximately 3.9 million tCO₂e, demonstrating that the proposed scheme would deliver a substantial net reduction in greenhouse gas emissions and is consequently considered to be strongly beneficial in terms of climate change mitigation.

Climate Change Risk

PEIR Volume 2; Chapter 15

The Applicant has utilised Met Office key climate projections to assess climate change risk, considering worst-case scenario projections for the period 2070–2089. The following climate hazards have been identified:

- Heat waves
- Drought
- Flooding

These risks have been assessed as minor, with the following mitigation measures proposed to enhance resilience:

- Use of flood-resilient infrastructure
- Incorporation of durable materials
- Implementation of health and safety plans incorporating worker safety measures under extreme weather conditions

SCDC is generally in agreement with the applicant's methodology and baseline positions and the guidance used is appropriate. The initial assessments of likely impacts on climate and carbon are also broadly agreed with.

	<p>Summary of Requirements SCDC considers that that the Applicant should:</p> <ol style="list-style-type: none"> 1. Confirm that both greenhouse gas emissions and climate change resilience assessments will be carried through to the Environmental Statement (ES); 2. Provide a detailed breakdown of lifecycle emissions, including embodied carbon associated with construction materials and decommissioning; 3. Include a climate adaptation plan demonstrating how resilience measures will be implemented and maintained over the lifetime of the development; and 4. Commit to ongoing monitoring of carbon performance and climate risk as part of the scheme's Environmental Management Plan (EMP).
<p>12. Land and Groundwater Quality</p>	<p>Comments on the Preliminary Environmental Information Report (PEIR)</p> <p>Structure and Presentation of Land and Groundwater Quality</p> <p><u>PEIR Volume 2; Chapter 9 and Chapter 10</u> Within the Non-Technical Summary, the <i>Land and Groundwater Quality</i> section is positioned between Section 9 (Built Heritage) and Section 10 (Soils and Agriculture) and therefore lacks a distinct section of its own. It is also omitted from Table 3 as a listed topic, despite being referenced within the accompanying key. This inconsistency should be rectified to ensure that the topic is clearly represented and appropriately assessed within the Environmental Statement (ES), in line with the requirements of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (as amended).</p> <p>Ground Gas and Contamination</p> <p><u>PEIR Volume 2; Chapter 9; Paragraph 9.3.13.</u> This paragraph states that potential risk from ground gas has been scoped out of further assessment, nothing that</p>

“The potential source-pathway-receptor linkage relating to ground gas at the site was not considered to be sufficiently viable to require further assessment”

This statement appears inconsistent with the findings and recommendations of the RSK Preliminary Risk Assessment (PRA) (Appendix 9.2). The PRA recommends further investigation, including gas monitoring. This discrepancy requires clarification to confirm whether the site has been appropriately characterised and whether the scoping decision remains justified.

PEIR Volume 2; Chapter 9; Paragraph 9.5.2

At paragraph 9.5.2, mitigation measures are described as being secured through the Outline Construction Environmental Management Plan (CEMP), including best practice measures such as use of appropriate personal protective equipment (PPE), dust suppression, piling risk assessment, and a *Discovery Strategy* for unforeseen contamination. While a Discovery Strategy is considered an appropriate precautionary measure for the wider development, this alone does not align with the recommendations of the RSK PRA, which identifies the need for a Phase 2 Site Investigation to address the potentially complete contaminant linkages identified in the preliminary assessment.

Soils and Agricultural Land

PEIR Volume 2; Chapter 10; Paragraph 2.13

The Council notes that the majority of agricultural land within the scheme boundary is classified as Grade 3a and above, and therefore falls within the category of Best and Most Versatile (BMV) agricultural land. The PEIR states that:

“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.”

The Council considers that this approach fails to reflect the local context and productivity of the affected land, much of which is classified as BMV (Grades 1, 2 and 3a). Nationally, these grades represent the most productive and versatile soils, capable of supporting a wide range of crops and contributing significantly to food security. The consultation proposals lack detail on the likely impact of the indicative layout on BMV land. No discussion has taken place with the Council that would help to inform the Council conclusions on this matter at this time. The Council therefore requires clarity from the applicant on the impact of the proposals on BMV land within the development by way of a detailed breakdown of agricultural grades within the development area, including confirmation of the extent and distribution of Grades 1, 2, and 3a land of the total site area, including the grid connection corridor.

The PEIR also states that

“...throughout operation, significant proportions of the Site will be able to be grazed, which will help increase soil organic matter and overall soil quality”.

However, there is no certainty that grazing will occur in practice, nor that the benefits suggested would be realised. Such assumptions cannot be relied upon as mitigation or justification for discounting the potential effects of the loss of productive land on food production.

Furthermore, National Policy Statement EN-3 (Part 2.48–2.49) requires applicants to demonstrate that the use of BMV land has been minimised and that alternative, lower-quality land has been fully considered through the site selection process. On the basis of the current information, the Council is not satisfied that the applicant has met this requirement or provided sufficient evidence to show that the loss of BMV land has been avoided or appropriately mitigated.

Recognising that the assessment remains preliminary, and that further details on soil management and mitigation are to be provided in the Outline Soil Management Plan (SMP) and Outline Construction Environmental Management Plan (CEMP), the Council reserves the right to comment further on this matter through Technical Working Groups and in subsequent engagement stages.

	<p>Summary of Requirements</p> <p>SCDC require the Applicant to:</p> <ol style="list-style-type: none"> 1. Ensure <i>Land and Groundwater Quality</i> is clearly presented as a standalone section within the ES; 2. Provide clarification on the decision to scope out ground gas assessment, with reference to the findings of the RSK PRA; and 3. Commit to undertaking a Phase 2 Site Investigation in accordance with the recommendations of the RSK PRA to appropriately assess and mitigate land contamination and ground gas risks. 4. Provide a full Agricultural Land Classification (ALC) survey (including the grid connection corridor), confirming the distribution and extent of Grades 1, 2, 3a, 3b, and below. 5. Demonstrate compliance with EN-3 (Parts 2.48–2.49) by evidencing that the use of Best and Most Versatile (BMV) land has been minimised and that alternative, lower-quality land has been properly considered. 6. Provide a clear Soil Management and Mitigation Strategy through the Outline Soil Management Plan (SMP) and Outline CEMP, to ensure soil function, structure, and fertility are preserved during and after construction.
<p>13. Water resources & Flood Risk</p>	<p>SCDC defer to Cambridgeshire County Council as the Lead Local Flood Authority and the Environment Agency on this matter.</p>
<p>14. Minerals and Waste</p>	<p>SCDC defer to Cambridgeshire County Council as the Minerals and Waste Local Planning Authority on this matter.</p>
<p>15. Transport and Highways</p>	<p>SCDC defer to Cambridgeshire County Council as the Highway Authority on this matter.</p>

16. Public Rights of Way	SCDC defer to Cambridgeshire County Council as the Highway Authority on this matter.
17. Archaeology	SCDC defer to Cambridgeshire County Council on this matter.