

FAO [REDACTED]
Head of NSIP Projects
Downing Renewable Developments
By email: enquiries@kingswaysolar.co.uk

Lancaster House, Lancaster Way,
Ermine Business Park, Huntingdon,
Cambridgeshire. PE29 6XU

www.anglianwater.co.uk
strategicgrowth@anglianwater.co.uk

Our ref: Kingsway Solar/Stat Con

29 October 2025

Dear [REDACTED]

**Planning Act 2008, Section 42: Duty to consult on a proposed application
Kingsway Solar Farm – Statutory Consultation**

Thank you for consulting Anglian Water on the statutory consultation for Kingsway Solar Farm (the Project), which is located within the local planning authority areas of East Cambridgeshire District Council, South Cambridgeshire District Council, and Cambridgeshire County Council. Anglian Water is the statutory sewerage undertaker within the Project area as defined by the draft Order Limits, and statutory water undertaker for the area within East Cambridgeshire. This response is in our statutory capacity regarding water resources, water supply network, water recycling assets and the sewer network, as well as the related role of surface drainage.

PRELIMINARY ENVIRONMENTAL IMPACT REPORT (PEIR)

It is noted that the PEIR references the meeting the Applicant has held with Anglian Water following our representation on the non-statutory consultation. Anglian Water would welcome further engagement with the Applicant to discuss the matters raised in our response.

PRELIMINARY ENVIRONMENTAL IMPACT REPORT (PEIR)

CHAPTER 2: SITE CONTEXT

The site extent is wholly within the Anglian Water's operational area for sewerage, and partially within our water supply area (broadly in the East Cambridgeshire district part of the project area).

Within the sub-section Water Resources (2.7.23 - 2.7.25) there is no mention of the water resource zones that the project area falls within. These will be WRZs within Anglian Water and Cambridge Water operational areas, which should be referenced accordingly.

CHAPTER 3: THE SCHEME

3.2.2 It is noted that the decision on whether the inter-array connections will be via overhead lines or underground cabling is yet to be decided. However, based on the map [Vol.3 Fig. 1.3] the

proposed inter-array connection corridors 1 and 2, do not appear to interface with our underground assets.

3.2.3 The grid connection is proposed to comprise a 15km 400kV overhead line (OHL) to connect the developable area to the planned Burwell South Substation. This corridor interfaces with Anglian Water underground assets, and a planned strategic interconnector for water supply between Grafham and Rede (via Cambridge). We advise the Applicant to seek further technical and design assurance from Anglian Water when these decisions are refined in advance of the DCO submission. This can assist with ensuring suitable mitigation measures are addressed in the Construction Environment Management Plan (CEMP) and Register of Environmental Considerations (REAC), together with any implications for refining the red line boundary should any diversions be required.

3.3.4 Anglian Water agrees that key design aspects such as the layout of the solar PV modules will require flexibility. For example, a sufficient buffer should be provided each side of our underground sewers in the layout and configuration of the PV panels in the developable areas, so there is a suitable working area to repair and maintain our pipes in an emergency or as planned operational maintenance. This mitigation measure should be identified in the Outline CEMP.

As a result of these interfaces with our water supply and sewerage assets, Anglian Water strongly recommends that clash detection and asset assessment is undertaken as early as possible and before the design fix. This ensures clarity, reduces risk, and supports the timely and efficient delivery of the Project. Given the large number of NSIPs across the East of England and other Anglian Water projects being delivered in this Asset Management Period 8 (AMP8 - 2025-2030), there is a strong advantage to having upfront discussions with Anglian Water in relation to our asset interfaces with the Project.

Discussions with Anglian Water will help ensure that tailored, project-specific advice can be provided to help de-risk the delivery programme as the Project comes forward. Where there are interfaces with our assets, we will require specific Protective Provisions for Anglian Water to be included in the draft DCO - our template Protective Provisions have been sent to the Applicant for review.

Our National Infrastructure team is responsible for identifying Anglian Water assets in relation to the Development Consent Order (DCO) process. Early engagement is critical to ensure accurate asset data is captured and to avoid potential delays later in the Project lifecycle. Sharing data at an early stage enables timely clash detection and coordination. To support efficient assessment and integration into our systems, it would be helpful if the revised boundary/mapping is provided in Shapefile format so that we are able to update our records.

Engagement with us on the asset interfaces of the Project can include:

- Clash detection and resolution
- Early design and technical assurance
- Asset protection and diversion planning
- Coordination with Anglian Water investment schemes (current and planned)
- Review of red line boundary implications

Costs will be incurred to support project development and internal planning and this can be discussed further with the Applicant, to provide a high-level desktop assessment of each interface between the Project and Anglian Water assets or projects, but this will be dependent on project size, complexity and requirement from the Project. Typically, this includes input from both Anglian Water Services and our delivery teams.



Water Management

Water Usage

Paragraphs 3.8.2- 3.8.4 state that solar farms typically have low potable/non-potable water usage but will require more water through the construction phase. We support the fact that there will be no more than 20m³/day required during construction.

Anglian Water's non-domestic water requests position statement can be found [here](#). It is noted that the demand for water during construction, will be less than 20m³/day and as such we would be satisfied if the CEMP provides a requirement for the preparation of a Construction Water Management Plan to detail the water requirements, sources of supply and measures to reduce consumption. We would encourage pre-planning enquiries to be made through our [InFlow](#) platform to ensure the Project's water requirements are appropriately addressed.

However, if in the intervening period, prior to submission, the Project calculates that it is likely to exceed 20m³/day for non-domestic water, we would require the submission of a Water Resources Assessment for consideration by our internal Board to determine whether the water could be made available. We would request that this level of demand is appropriately addressed through the Environmental Statement, detailing the amount of water for domestic and non-domestic use, and any requirements for fire suppression. Bearing in mind that the project crosses two different water company areas, and the assessments should be based on the respective components of the project during construction and operation and the water requirements associated with these.

It is also proposed that BESS Unit fire water storage capacity of up to approximately 240,000 litres will be initially filled by water transported to site. The Developable Area B and the site for the BESS is not within Anglian Water's water supply area - however, we would seek confirmation regarding where the water to fill tanks will be sourced. We support the use of rainwater harvesting to help maintain and top-up the storage tanks, however, we are aware that there are requirements regarding the period of time within which the tanks need to be refilled to provide a fire suppression system, which may require a mains supply.

Foul Drainage

Anglian Water notes that there are no plans to connect temporary construction compounds to the mains sewer network, and operational sites will have cess pits that will require wastewater to be tankered away for treatment [3.8.5]. Anglian Water notes that due to the rural location of the Project, and public sewers will be in discrete catchments associated with a settlement or settlements, then permanent operational sites (such as the BESS or substations) will not be in a reasonable distance to the connect to the sewer network.

Surface Water Drainage

Anglian Water supports the use of attenuation and sustainable drainage systems (SuDS) to address run-off from the substation and BESS compounds [3.8.8]. The Environmental Statement (ES) should be clear that there will be no connection to the public surface water sewer network and the draft DCO should not include any power to discharge to the public sewer.

3.10 Construction

Paragraph 3.10.2 lists the types of construction activities that may be required. This includes the installation of bellmouths and haul roads and the establishment of construction compounds. Anglian Water's assets can be located adjacent/under existing tracks, follow roads/within road verges and cross fields, within the Project's red line boundary. Any reprofiling of land associated with these construction activities can reduce the depth of soil covering over our assets, and increase risk of damage to pipes from soil compaction/vibration from large vehicles. The Outline CEMP should ensure that these risks are avoided, or suitable mitigation measures are put in place.

CHAPTER 4: ALTERNATIVES AND DESIGN EVOLUTION

4.3.33. The PEIR states that land beneath the OHL can remain in its existing use. However, OHL can present challenges, and increased risks to working on our below ground assets such as water mains and sewers, due to easements and safe working distances that require consultation with the operator to agree the measures required when maintaining, repairing existing assets or installing new assets. In terms of high voltage OHL there is also the risk of AC interference with underground pipes to take account of. The OHL route should be sited to avoid interfaces with our assets wherever possible.

Other environmental considerations [para 4.3.37] should include the presence of utilities in order to avoid or minimise any significant environmental or social effects.

Grid Corridor Options: Table 4.1 outlines the comparison of Grid Connection Corridors. Anglian Water has underground assets within both corridors and our strategic interconnector between Grafham and Rede (via Cambridge) would interface with either option as it will bisect the corridors in a east-west direction. Anglian Water supports the statement that the corridor will be refined further having regard to the statutory consultation and ongoing engagement with stakeholders. The indicative OHL route and pylons in Plate 4.2 will require ongoing refinement, and Anglian Water would welcome further engagement on these matters.

Table 4.2 Design Evolution states that PV layout design has responded to environmental considerations by setting appropriate offsets. Offsets to existing underground utility assets should also be included to inform the layout design to ensure appropriate working distances for the repair and maintenance of our assets. It is noted the Final DCO application design will evolve in response to feedback from the consultation and information gathered through the completion of environmental surveys.

CHAPTER 5 EIA METHODOLOGY

Cumulative Effects

Inter-Project Effects Assessment Methodology

Anglian Water recognises that cumulative schemes are generally based on existing and/or approved development, given that the information is readily available from local authority planning registers or the Planning Inspectorate website [para. 5.9.13]. It is not identified whether projects in early stages of development that are brought to the attention of the Applicant, and have the potential to interact in a cumulative manner, will be considered in the ES.

Anglian Water will be delivering a strategic interconnector pipeline between [Grafham and Rede](#) (West Suffolk) as identified in the Water Resources Management Plan and PR24 Business Plan - therefore, it is considered to be a matter that the Applicant should assess under Criteria Tier 3 for "*other developments identified within other relevant plans and programmes...that are considered reasonably likely to be progressed*".

CHAPTER 9 LAND AND GROUNDWATER QUALITY

9.3.27 In respect of the cumulative assessment for this chapter, whilst Anglian Water's Cambridge Waste Water Treatment Plan Relocation DCO is listed and was consented in April 2025, the Government has decided not to fund the delivery of the project. Further information can be found [here](#).

It is noted that the Source Protection Zones (SPZs) are identified where the developable areas, inter-array connections and grid connections apply. These SPZs lie within both Anglian Water and Cambridge Water operational areas - for Anglian Water's operational area for water supply, it applies to the SPZs within the grid connection corridor. Table 9.1 Summary of Receptor Sensitivity identifies all SPZs as high sensitivity; Anglian Water therefore agrees that piling risk assessments should be prepared as part of the outline CEMP particularly where pylons are proposed through SPZ1 and 2 of the grid connection [9.5.3]. Anglian Water would seek further consultation on any piling risk assessment or hydrogeological assessment for the Project as it progresses and supports the embedded mitigation measures proposed in 9.5.5 that seek to mitigate identified risks to vulnerable aquifers, such as locating permanent infrastructure away from sensitive SPZs and groundwater abstraction points.

Table 9.2: Key developments near the Scheme should include the 70km [Grafham to Rede pipeline](#), which will be delivered in two stages. The first section of this pipeline, Grafham to Cambridge, has reached the Scoping Stage with the EIA Scoping Report submitted to the Local Planning Authorities, and initial [public consultation](#) currently being undertaken. The second section (Cambridge to Rede) will be delivered separately by Anglian Water at a future date. Anglian Water considers that the strategic interconnector should be assessed with the other developments listed in the table at the ES stage to understand any potential cumulative impacts (Chapter 17 Cumulative Effects Assessment).

CHAPTER 12 NOISE AND VIBRATION

The impact of traffic vibration on underground water/sewer mains is not identified as an effect in Table 12.3. This is mainly a risk where the depth of soil covering our assets has been reduced due to the construction of temporary construction compounds, bellmouths and haul roads used by construction traffic. We would seek appropriate mitigation measures/key principles to be addressed in the Outline CEMP to avoid any adverse impacts arising from construction traffic vibration on the operation of our assets [12.5.5].

CHAPTER 16 OTHER ENVIRONMENTAL TOPICS

16.6 Water

Water Stress Area

Paragraph 16.6.20 should be corrected to state that "The Site and study area falls within the Anglian Water and Cambridge Water (water companies) extents which are classified as areas of serious water stress."

Surface Water Management

Anglian Water supports the preparation of an outline Surface Water Management Plan (SWMP) for the Scheme, and the use of strategic SuDS features to provide ecological and biodiversity benefits. As previously alluded to, in our response under Chapter 3, Anglian Water supports the management of surface water in accordance with the drainage hierarchy, so that measures such as SuDS and drainage to an existing water course is prioritised over connection to a public surface water sewer. The outline SWMP should clarify that a connection to a surface water sewer is not required.

Water Resources

Further to our response under Chapter 3, Anglian Water supports the statement that the Applicant will not exceed 20m³/day limit for non-domestic water in accordance with our Position Statement

[16.6.34]. Measures to reduce potable water demand are supported - e.g. through rainwater harvesting to provide water for dust suppression during construction, and refilling water storage tanks for fire suppression.

It is noted that private water supplies and abstraction will be used for raw water requirements, with public mains supply where feasible. Should a water supply connection be required within Anglian Water's operational area, we would encourage the early submission of a pre-planning enquiry to our Inflow platform to assess feasibility and deliverability.

CHAPTER 17 CUMULATIVE EFFECTS ASSESSMENT

Anglian Water would suggest that the assessment of likely significant cumulative effects in combination with other developments, should include the Grafham to Rede strategic pipeline, when these are updated as the Scheme evolves through the design process, to inform the ES.

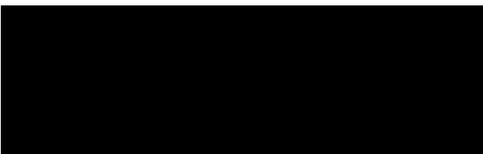
CONCLUSION

Anglian Water will seek to engage further with the Applicant through the pre-application phase to discuss, amongst other matters:

- Impact of construction/operation of the Project on Anglian Water's water and water recycling assets
- The design of the project to minimise interfaces with Anglian Water's existing and proposed assets and specifically to avoid the need for diversions which have carbon costs
- The need for potable water supply connections (including tankering requirements)
- Draft Protective Provisions and Requirements, and
- The preparation of a draft Statement of Common Ground prior to submission.

We look forward to continuing discussions with the Project Team on these matters, to ensure these are appropriately addressed in the draft DCO.

Yours sincerely,




Spatial and Strategic Planning Lead

