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Date: 4th February 2026
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Frank Jordan, Deputy Chief Executive
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**Place and Sustainability
Environment, Planning and Economy**

Sent via email to:
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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 targeted consultation for the Kingsway Solar Farm proposals, which commenced on Wednesday 7th January and closes on Wednesday 4th February.

Attached to this letter is a table containing the council's comments relating to the changes that formed the targeted consultation. 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
Place and Sustainability



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 Targeted Consultation in accordance with Section 47(2) of the Planning Act 2008 for the Kingsway Solar Farm proposals.

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. There are 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 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.

Any comments made in the table below from technical officers are in addition to the council's comments made as part of the Statutory Consultation. Comments below relate to additional impacts as a result of the changes and new information provided.

Specialism	Proposal aspect referred to	Comments
Air Quality		<p>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.</p> <p>The council reserves the right to comment on this subject through technical working groups and responses, in particular as it relates to Public Health.</p>
Noise		<p>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.</p> <p>It is noted substation sites, and the Battery Energy Storage System (BESS) site have been expanded. In terms of the impact of noise from transformers and other electrical infrastructure on users of public rights of way, including equestrian users, the council would request the noise impact is reviewed against the latest design.</p> <p>The council reserves the right to comment on this subject through technical working groups and responses, in particular as it relates to public health and public rights of way.</p>
Biodiversity		<p>Regarding biodiversity, the council has concerns that the proposed changes will reduce the area of land available for landscape and ecological mitigation and enhancement, including areas in area B supporting notable arable plants. The council is also concerned that the design choices for the scheme have not been informed by the biodiversity interest of the site, particularly where the full suite of ecological surveys have not been completed (e.g. no botanical surveys within area C, or any reptile surveys across the site).</p> <p>If these changes go ahead, the council requires more robust demonstration by the applicant as to how they have designed the scheme to avoid biodiversity impact, with a well-planned landscape scheme and Landscape and Ecological Management Plan (LEMP) that will deliver high-quality biodiversity, supporting nationally/internationally important flora, sufficient nesting habitat for ground nesting birds, and supporting the local bat and reptile populations. For example, reliance on creating small strips of</p>

Specialism	Proposal aspect referred to	Comments
		arable field margins along the edge of the solar array field alone will not be acceptable to mitigate impact to arable flora.
Archaeology and Historic Environment		<p>The council has considerable concerns about the changes within the targeted consultation from an archaeological perspective.</p> <p>The archaeological trial trenching evaluation that is currently underway was designed to target areas of impact, including solar arrays. Therefore, the light blue areas proposed for inclusion in the scheme are not within the scope for trial trenching. Several of these areas for inclusion contained geophysical anomalies indicative of significant archaeological remains when subject to archaeological geophysical survey a couple of years ago.</p> <p>The area proposed for inclusion at the northwest end of site A contains a scheduled monument. Historic England will need to be consulted on any development in and around this.</p> <p>The area proposed at the southern end of B is directly adjacent to the scheduled monument of the Fleam Dyke.</p> <p>The area proposed at the northern end of C contains geophysical anomalies indicative of complex, enclosed later prehistoric or Roman remains.</p> <p>All new areas need to be included in the current evaluation to allow consistent and complete information about the schemes impact on the historic environment, and to support the forthcoming Environmental Statement (ES).</p> <p>Having reviewed the new updated areas for solar photovoltaic (PV) panels, the council can support the removal of the land parcel to the immediate southwest (SW) of Weston Colville Hall and southeast (SE) of Bull Lane from the scheme, due to the significance of the archaeology present.</p> <p>It is noted that large new areas are proposed for solar panels, none of which have been included in the scope of the current trial trenching evaluation, and several areas of more major development impact have increased in size.</p> <p>It is noted in the consultation material when referring to field A1, “archaeological constraints in this field will be considered in preparing the detailed layout”. Based on the above this applies to all the new fields proposed to have solar panels, and appropriate evaluation is needed.</p>
Landscape and Visual		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

Specialism	Proposal aspect referred to	Comments
		<p>infrastructure that falls within South Cambridgeshire District Council and East Cambridgeshire District Council's boundary.</p> <p>The council reserves the right to comment on this subject through technical working groups and responses.</p>
Land Use, Quality, Soils and Agriculture		<p>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.</p> <p>The council reserves the right to comment on this subject through technical working groups and responses.</p>
Public Rights of Way (PROW)		<p>It is noted the new areas of solar will add to the impact of public rights of way. This includes PROWs being enclosed on both sides by solar panels. The larger BESS site will also have a greater impact on the bridleway that is alongside the site. The council would welcome the opportunity to discuss further appropriate mitigation measures. This would include but not limited to sufficient offset of panels to PROW, appropriate heights of the panels, and green corridors where PROW are located through or between solar fields, as well as enhancements to the local PROW network.</p>