

Carlton cum Willingham Parish Council

Comments on the Kingsway Solar Scoping Environmental Impact Assessment Report

January 2025

Community and rural setting

The parish of Carlton cum Willingham consists of the main village of Carlton, where our only community building, St Peter's church is located, and the small hamlets of Willingham Green one mile or so to the north west and Carlton Green one mile to the south. The total population is about 165. Although only a 20 minute drive from both Newmarket and Haverhill, there is an intensely rural character to the village and hamlets, surrounded as they are by undulating mainly arable fields, small woodlands and shelter belts, hedgerows and miles of footpaths and bridleways.

Many residents were born in the villages and others have deliberately chosen to move here, in order to enjoy the countryside and these footpaths, which are heavily used. We know from the visitors book in St Peter's that many visitors also come to the village, drawn by its attractive setting and enjoying local walks, as well as following nearby walking trails including the Icknield Way, Stour Valley footpath and the E2 European Long Distance Route.

Our parish boundary is unusual in being far larger than the village framework and extends in an elongated 'bulge' all the way to almost reach Six Mile Bottom Road. Area C cuts across this land and runs right up to the Carlton village boundary, to within 200 metres of Cocksedge Farm, surrounds one side of Willingham Green right up to residents' back gardens on the western side of Willingham Green Road and along Weston Colville Road, and its eastern boundaries lie only a couple of fields' distance west from Carlton Green. Lower Wood, a much valued and important local nature reserve, is also right on the boundary of Plot C.

The images below show the countryside around Carlton. The third and fourth image show the view from the footbridge next to Cocksedge Farm.

View from Carlton
part of parcel c ///



View from C
///sadly.e





Difficulties with responding to the scoping EIA report

The scoping report has been written before the design of the proposed scheme (position and layout of solar panels, battery storage etc) has been published. The report repeatedly says that 'the detailed design of the Scheme is still emerging, as are the environmental surveys and assessments required to support the planning and EIA process', and further states that some aspects of the design may not be decided until after the development consent order has been made.

We know that area C was a very late addition to the development plan, with A and B having been presented in early 2024. The report says that many of the environmental and other studies that are required will be carried out in area C during 2025 and as a result this scoping report is lacking in detail and any certainty in relation to area C, making it difficult to assess confidently.

Choice of location and other options considered

The justification for the choice of area C in the development in particular, is unconvincing in Section 3.2.

In his letter responding to the informal consultation, our district councillor Geoff Harvey, describes how there appears to have been a complete volte-face in DRD's plans for Kingsway Solar, from presenting areas A and B in early 2024 with a connection offer for 200 MW accepted and with work taking place to establish an onsite Point of Connection to the National Grid through the 400kv Burwell to Pelham line that crosses the site', to now the addition of area C and the need to build a cable back to Burwell South.

Our local MP, Pippa Heylings, has responded to concerns of local residents and stated that the Liberal Democrats are strongly advocating with the government to

produce a Land Use Framework, which would guide future renewable proposals to the most appropriate locations and that it is wrong to approve new solar developments before this is in place.

Instead, area C appears to have been added simply because the local landowner in area C has been willing to put up vast tracts of his estate for lease, which is hardly a planned and logical way to develop such nationally important renewables projects on a scale as large as this.

To say in fact (Sections 3.2.4 and 3.2.5) that key factors in choosing the three sites A, B and C were land characteristics and topography calls the choice of these areas into question, given their rolling and undulating landscape which would make it extremely difficult to adequately screen panels and batteries from view. It is also strange that Table 3-1 states under 'proximity to sensitive human receptors' that 'consideration was given to the proximity of nearby sensitive human receptors which include residential dwellings, populated areas and villages', when area C surrounds West Wrating, Weston Colville and as already said, would be right outside the back gardens of residents in Willingham Green.

Landscape and visual amenity

It is difficult to understand the report's assertion that (page 191):

'For all of the above settlements there would be generally limited views of the Scheme due to the gently undulating local topography, scattered vegetation across the landscape, inward looking nature of many of the settlements and, in relation to the Developable Area, the largely low-level nature of the Scheme. There is theoretical potential to see elements of the Scheme from the edges of these settlements, particularly those in proximity to the Grid Connection Corridors. There is also potential through design and mitigation to minimise the potential views of new infrastructure, particularly associated with the Developable Areas'.

To describe the residential areas as 'inward looking' and that there is only 'theoretical potential' to see the scheme from the edges of the villages is wrong for what are often linear layouts of villages such as Willingham Green and Weston Colville where back gardens frequently have open views across open countryside and residents walk pathways and bridleways daily across the landscape, looking beyond their residences.

The first group of settlements listed in Section 6.2.5 page 190 Visual Receptors Settlements is confusing and misleading. West Wrating and Weston Colville would be surrounded by the development, not 'directly adjacent to Developable Area C' and the report also incorrectly states that only the outer edges of West Wrating are within the ZTV, whereas it, along with Weston Colville, Weston Green and Willingham Green, as well as most of Carlton are actually entirely within the STZ.

Section 6.2 does not therefore adequately reflect or give consideration to the significant and adverse impacts on the landscape and visual amenity that this development would have. As the report states, the 'landscape has distinctive, open, panoramic views to wooded horizons'.

The project's vast scale would significantly alter the East Anglian chalk hills landscape in Areas A and B and the wooded claylands landscape of Area C. The introduction of solar arrays, battery energy storage systems (BESS), and a 14 km overhead grid connection would disrupt the rural character and visual continuity of the region. These changes will be particularly noticeable from elevated viewpoints and along public rights of way, diminishing the area's appeal to both residents and visitors.

Below are some images of the fields around Carlton, which are part of Area C, to show views towards Lower Wood nature reserve from Carlton and the view through the hedge to Area C from the bridleway which goes north west from near St Peter's Church .





The proximity to Registered Parks and Gardens, such as Wilbraham Temple and Swaffham Prior House, and Conservation Areas like Balsham West End and Brinkley, further intensifies concerns. These areas are valued for their historical, aesthetic, and recreational significance. Mitigation measures such as extensive tree planting and visual barriers are unlikely to fully offset the industrial aesthetic.

Glint and Glare

For these reasons, although 'Glint and Glare' is scoped out of the environmental factors for further assessment (Section 5.3), it is difficult to believe that on such undulating landscape, hedging and other vegetation would be able to adequately mitigate the impact on dwellings, PRow and country roads. We note that a detailed separate glint and glare assessment will be undertaken to inform the design development and landscape mitigation plan.

Lighting

We are concerned that lighting of the solar farm, particularly during construction, should be scoped in for further assessment in the EIA and ES because of its impact on landscape character and local wildlife. There are poor existing examples of bright lights impacting the local area at the Jelly Warehouse and Weston Woods Farm, and given that the construction phase would last as many as three years, it would be preferable for construction lighting, even if only occasional or temporary, to be appropriate to its rural setting.

Scoping questions 6.2.13

Do you agree with the proposed consultees to be engaged with on this topic?

Parish Councils are not listed as consultees in this section and it is perhaps not therefore surprising that some parish councils, including ours, were initially excluded from the Planning Inspectorate's notification of EIA Scoping report consultation, and were only included when we questioned this. It is disappointing that despite this omission the deadline for submissions has not been extended. As the closest layer of local government to many of the receptors included for assessment in the Landscape and Visual Impact Assessment, it is essential that parish councils are involved in discussions and able to represent their residents' concerns.

Do you agree that the surveys proposed to inform the LVIA are appropriate?

We would ask that further assessments will be undertaken to inform the EIA, post-scoping (6.2.4) so that we are assured that Area C has been adequately assessed, given it was only added to the development plan in summer 2024.

Do you agree with the landscape and visual receptors that are proposed to be scoped in and out of further assessment?

See above regarding glint and glare and construction lighting remaining in scope.

Are there any other developments which you consider it will be necessary for us to address in a cumulative landscape and visual impact assessment?

Yes, the 13 wind turbines already in area B and associated pylons across to the substation at Burwell. See also other sites listed in 'Cumulative Effects', below.

Agricultural Land Classification

The proposed Kingsway Solar Project will utilise approximately 1,520 hectares, a significant portion of which consists of the Best and Most Versatile (BMV) agricultural land (Grades 1, 2, and 3a). These grades categorise the land as highly productive and critical for food security.

In Section 3.2.5 the applicant details that a site-specific Agricultural Land Classification (ALC) survey was completed in spring 2024 for areas A and B which found that 45.9% of the land in areas A and B is of grade 3a or higher, which is at odds with Natural England classifications that the whole area is BMV, grade 3 and above.

The National Planning Policy Framework (NPPF) emphasises protecting BMV land, stating that local planning authorities should guide development to areas of poorer agricultural quality whenever possible. Developing this project on BMV land contradicts these principles, risking long-term agricultural productivity in the region. In stating that planning policy doesn't preclude the use of BMV land for solar development and finding that the ALC is downgraded in quality, it is concerning that the applicant seems to be laying the ground for a loose interpretation of national policy statements and pursuing development on BMV land. We await the outcome of surveys of agricultural land quality for Area C and hope that sufficient detail will also be provided about the survey itself, as there are no details provided in the report about the organisation which carried out the surveys of Areas A and B and what method was used.

The loss of BMV land to such a huge development also raises concerns about national food security amidst growing demands for sustainable and locally sourced food production. This region contributes significantly to arable farming outputs, supporting a range of crops vital to both local and national markets. The potential displacement of farming activities may result in increased reliance on imports, which undermines efforts to bolster domestic food resilience.

Furthermore, the loss of prime agricultural land will adversely affect local farming communities, reducing employment opportunities and impacting the local economy. Farming supports not only agricultural workers but also supply chains, local

businesses, and regional markets. It is worrying that the report states in 6.8.4 that no surveys are planned regarding employment and the local economy and that baseline information from other environmental factors will be used instead.

The EIA scoping report lacks sufficient justification for prioritising this site over areas of lower agricultural value, and as described earlier in our response, it fails to provide a comprehensive assessment of alternative locations, locations which could minimise the impact on high quality agricultural land.

Biodiversity, habitats and wildlife

The developable project site includes and is near several ecologically sensitive areas:

- **Statutory Sites:** Devils Dyke SAC, Fleam Dyke SSSI, and Newmarket Heath SSSI, among others.
- **Non-Statutory Sites:** Old Cambridge Road Verges CWS and West Wratting Valley Farm CWS.

These areas host diverse flora and fauna, including protected species and priority habitats. The development threatens deciduous woodlands, lowland calcareous grasslands, and lowland fen areas. These habitats provide critical ecosystem services, including carbon sequestration, water filtration, and biodiversity support, which would be severely compromised by construction and operation activities. Disturbances during the construction, operation, and decommissioning phases risk habitat fragmentation, species displacement, and long-term ecological degradation. Having such large tracts of land fenced once the solar farm is operational is bound to have long-lasting impact on the movement of mammals such as deer, badgers and hares.

Furthermore, the report acknowledges proximity to ancient woodlands like Hill Croft and Great Coven's Wood. These irreplaceable resources serve as biodiversity hotspots and cultural landmarks. Disruption to these woodlands could result in the loss of habitat for key species and diminish their historical significance.

The EIA scoping report inadequately addresses potential mitigation measures and it isn't clear what 'mitigation/compensation' means in 6.1.8. While measures such as buffer zones and habitat creation are mentioned, there is insufficient detail on how these will be implemented and monitored over time. A comprehensive ecological management plan is necessary to minimise habitat destruction, manage species relocation, and ensure long-term ecological resilience.

It is therefore very concerning that it is stated that relevant ecological and habitat surveys haven't yet been carried out in area C. How then is it also stated that proximity of Developable areas A and B being close to Area C means that they are known to contain similar habitats? It is doubtful that this can be entirely true given the chalk hill character of the landscape in Areas A and B and the wooded clay land of Area C and the lack of surveying done in Area C to date.

Scoping question section 6.1.14 - *Do you agree that the surveys proposed to inform the EIA baseline characterisation are appropriate?*

No. The Table in 6.1.10 pages 176-177 scopes out many species and receptors such as woodlands, river and streams in Area C from further assessment. We request that as stated in 6.1.9 the scoping of receptors in and out of the PEIR and/or ES will be revisited as the design of the scheme progresses and would strongly argue that the receptors on pages 176-177 should be scoped in from the outset until equivalent land-based surveys to those already carried out in areas A and B are also carried out in area C.

We note that the scoping report states that Ramsar sites have been avoided and that the planned Habitats Regulations Assessment (HRA) will consider these sites. Wicken Fen (Ramsar criterion 1) for example is only 2.08km north west of the developable site and we are concerned about the impact of the solar farm and pylons during construction and once operational, for important migratory birds, so would argue that these should be scoped in for the developable areas A-C, not only the grid connection corridors.

Finally, we hope that the applicant would be genuinely held to improvement work for enhancing the environment as outlined in Section 6.1.11, as part of any planning approval.

Water and Groundwater

Water is scoped out when only two waterbodies in A and B are named but those (the Stour and Granta) in area C are not mentioned in section 4.11.2. It's not clear therefore why it is proposed in 5.2 that water is excluded from the scope of the EIA. Sections of the site lie within Flood Zones 2 and 3, indicating significant flood risk. We believe that the water table in Area C is high. The construction of impermeable surfaces and infrastructure could exacerbate surface water runoff, heightening the likelihood of downstream flooding. Furthermore, potential contamination from construction activities may jeopardize nearby water bodies and aquifers, including those designated as principal aquifers and Source Protection Zones (SPZ).

6.4.13 Scoping question *'Are any receptors/assets/resources not identified that you would like to see included in the EIA?*

It is reassuring to read that groundwater contamination is scoped in to further assessment for the construction and decommissioning phases (6.4.8) but worrying that it is then scoped out of assessment for the operational phase.

The potential impact of contamination during operation caused by for example discharge, losses or fire from the BESS on agricultural drainage systems must be assessed, as disruption to these networks could have cascading effects on local farming operations. We would therefore argue that contamination of groundwater during the operational phase should be scoped into the EIA and ES for more detailed assessment.

Traffic and road infrastructure

We note that the applicant states that assessment of potential traffic and road infrastructure is all based on desk-based studies at the moment and that some of the DfT count data in the report is well over ten years old. As residents who are familiar with our local roads we can assert that it is naive and ill advised to think that these roads would be able to cope with an increased volume of HGV traffic during the construction phase of the project.

In areas A and B, proximity to the A11 and the Wadlow Wind Farm may make traffic movement less problematic but area C is further from these and would mean that use of local smaller and narrower roads would be unavoidable.

It is not just the narrowness of many of the roads, particularly in area C that is the problem, but their general state of disrepair with large numbers of potholes. Creating passing places as mitigation will only partly address the challenges of large vehicles, and in reality may not be possible anyway. Existing heavy farm traffic leaves ruts on road verges and at peak times such as harvest, two streams of traffic meeting each other usually results in vehicles having to mount the verges.

Many of the villages in Area C, including Willingham Green, lack pavements for pedestrians meaning that residents are obliged to walk in the road. It is therefore

essential that construction traffic should be prohibited from taking routes through these villages.

It is also a major concern that an increase in HGV traffic and traffic volumes will inevitably lead to further degradation in the condition of our roads. The impact of such a large development with its impact on local residents in terms of traffic, noise and air quality over such an extended period of years, should not be underestimated. For all these reasons the proposed Construction Traffic Management Plan (page 268) would be essential and it should outline specific measures to minimise degradation and disruption, such as designated haulage routes, restricted delivery hours, and regular road maintenance.

6.7.13 Scoping questions

Overall we are in agreement with the scoping questions and approach outlined, but it is difficult to see how as stated in 6.7.6, local wildlife sites on verges can be avoided when developing mitigation measures, on such narrow rural roads.

Major accidents and disasters

We are extremely concerned that the applicant proposes scoping out of further assessment the risk of a major accident or disaster caused by fire in the Battery Energy Storage Systems (BESS). Although such fires are rare, the industrial scale of this proposed development must surely raise the risk level. Given that the development could also be located over a principal chalk aquifer that supplies drinking water to Cambridgeshire, Suffolk and beyond, information about mitigation should be comprehensive and detailed in the EIA itself and not only in an outline Battery Safety Management Plan as proposed in section 2.7.19.

In a discussion at our EGM with our residents in November 2024, they also questioned the safety of the panels themselves in a location which is very open and subject to stronger winds than are generally forecast. Coincidentally, shortly after this discussion, Storm Darragh was reported to have left hundreds of panels at the Porth Wen solar farm lifted from their mountings and destroyed. Given the anticipated changes in our weather patterns due to climate change and the potential proximity of the solar farm to housing, this now seems a valid concern.

Cultural Heritage

The proposed development endangers several Scheduled Monuments, including Fleam Dyke and Devil's Ditch. These ancient sites hold immense historical and archaeological significance, reflecting centuries of local heritage. Their inclusion within or near the development area risks physical damage and loss of setting integrity, which is crucial to their historical value and public appreciation.

Additionally, the site is near several Listed Buildings and Conservation Areas, such as Willingham Green, West Wratting and Great Wilbraham. These assets contribute to the cultural identity of the region, attracting visitors and supporting local businesses. For example, heritage tourism in these areas sustains small enterprises, including bed-and-breakfasts and guided tours. The project threatens to erode this cultural and historical character, a concern inadequately addressed in the scoping report.

A comprehensive cultural heritage assessment is needed to evaluate the full extent of the project's impact on these assets, including indirect effects on their settings. This assessment should prioritize stakeholder engagement, ensuring local voices are heard in preserving the region's rich heritage.

6.3.14 Scoping Question - *are any receptors/assets/resources not identified that you would like to see included in the EIA*

We note that the list of heritage assets is an 'initial gazetteer' but residents have alerted us to the omission of Cromwell Cottage (grade II listed Ref 1127133) in Willingham Green and the finds of over 614 artefacts of Roman, Celtic, Viking and Medieval origin found in Area C at Grid Ref: TL6258 54126, TL 624 541, behind Cromwell Cottage at TL 625 541 and south down to Cricks Farm TL 618 541 and also at the site of St. Matthews Chapel, Willingham Green TL6247 5395.

Attached with this response is a report from the Environment Team at Cambridgeshire County Council, which we have obtained, detailing the monuments and sites of cultural, historical and archaeological significance in and immediately surrounding Carlton in area C.

Cumulative Effects

Within our local area there are already a number of existing and planned renewable developments, as well as other large agricultural buildings with an industrial aesthetic. These include:

- 1) The wind farm of 13 turbines and a solar farm at Wadlow beside the A11
- 2) A biodigester approved to be built at Streetly End with another also in planning near Haverhill
- 3) An existing solar farm at Great Wilbraham
- 4) Solar farms approved by Sunnica north of Newmarket and in development at Six Oaks Renewable Energy Park, Bottisham
- 5) The Thurlow Grain Store at Weston Woods
- 6) The Camgrain Grain Store at Six Mile Bottom
- 7) As well as the new substation planned at Burwell.

The huge Kingsway Solar project with a 14 km corridor of overhead lines risks creating a significant cumulative visual impact when considered alongside this other infrastructure. The combined effect risks creating an industrial landscape, diminishing the rural character of the area, residents' enjoyment of their local environment and potentially deterring visitors who contribute to the local economy through tourism and leisure activities.

The EIA scoping report states in 7.1.33 that 'there is no formal guidance on the criteria for determining significance of inter-project cumulative effects' and we fear that the combined effect of these developments will amplify landscape degradation, biodiversity loss, as well as creating a disproportionate burden on the local area. Our local area is already contributing significantly to renewable energy and adding such a huge solar farm and battery storage would create a disproportionate burden.

A more detailed cumulative impact assessment is required to evaluate how these projects collectively affect the region's environmental and social fabric. This assessment should include input from local stakeholders including residents to ensure a comprehensive understanding of the combined pressures on the community, its health and the environment.

Conclusion

Overall the EIA Scoping Report has raised many concerns for residents in Area C, particularly since it is stated that many assessments and surveys of Area C are outstanding and have not been carried out before this scoping report was submitted. We hope that the Planning Inspectorate is mindful of this and of the total opposition to this planning proposal amongst residents of our parish in Area C, who are extremely concerned about its impact on local biodiversity and wildlife as well as its impact on their wellbeing and enjoyment of the Cambridgeshire countryside that they have chosen to live in.