

# **Feedback from Kingsway Solar Community Action to the Kingsway Solar Farm non-statutory consultation**

## **Introduction**

Kingsway Solar Community Action (KSCA) are a group of concerned individuals drawn from the communities affected by the proposed Kingsway Solar Farm with particular proximity to land areas A,B and C. Our overarching aim is to prevent the local area from being irreparably damaged by a large-scale development that will cover much of the land areas in solar panels, batteries, substations and grid connections. We believe that this will substantially impact our quality of life for the worse, have a negative effect on wildlife, landscape and land productivity, and bring a scale of industrialisation to the area that will never be reversed.

We understand that Downing Renewable Developments (DRD) will submit an application for this 500MW, 1500ha development whatever our objections may be, and that the role of this non-statutory consultation is to provide the communities with an opportunity to influence the design and present our case for compensatory arrangements (otherwise called 'community benefits'). This response is provided in the spirit of that purpose, but any proposed mitigations must not be taken as evidence for support for the scheme as a whole. They are minimum requirements to reduce the damage.

We would also like to point out that the NSIP process is one profoundly lacking in democratic oversight, and that the communities feel completely disempowered as all local planning is ignored, and there is no proper representational voice to argue our case. Powerful investors are able to bypass all democratic norms, with no statutory protections or routes for compensation for those most affected. The NSIP process has no strategic oversight, and is allowing large areas of land to be subject to plans and designs for which scrutiny seems inadequate, and inspectors' decisions can nevertheless be overridden by the Secretary of State. We would urge all such projects to pause until there is a proper Land Use Framework and Strategic Spatial Energy Plan in place for England. In addition we understand that there are moves to introduce mandatory community compensation schemes in England, such as those that currently exist in Scotland.

KSCA has produced a report, already sent to DRD, setting out our main concerns together with lists of questions we want to be answered. This report, as much as anything, was designed to also provide information to local residents who wanted to understand the possible impacts better, and that could inform their responses to this consultation. KSCA has met with David Vernon who made it clear that many of the questions cannot be answered until the environmental impact assessments are complete, and the preliminary designs and plans are finalised. We attach the original report here and set out below our immediate issues and red lines for this development.

## **Proximity to houses**

- No panels, battery storage or substations should be visible or audible from any houses
- Equipment should not be located on or close to any residential boundaries.
- Battery storage in particular must be sited a safe distance from any properties in keeping with all current standards, guidance and research on battery safety.

## **Landscape and amenity**

It is important to maintain, as much as possible, the character of the existing landscape, which is unique to this part of Cambridgeshire.

- The views from the Fleam Dyke and higher vantage points of the Icknield Way to the north (towards Ely) and north east are unique and should remain unobstructed
- The Fleam Dyke and Icknield way (as historic routes) are public rights of way and should remain in open countryside and not between fences
- All other public rights of way must be fully accessible and not enclosed by fencing to retain the open character of these areas
- Fencing must generally be kept to a minimum, and follow best practice adopted in other countries where sites are left unfenced
- All equipment must be suitably screened with vegetation
- No existing hedges, woodland or plantations should be removed or disrupted

## **Transport during construction and operation**

There will be a very long construction period (2-3 years advised by David Vernon), with large numbers of truck movements (to be advised).

- No regular construction traffic should pass through the villages, and it is paramount that access routes to the sites must be planned to ensure safety of residents and to avoid congestion on local roads
- In particular the Icknield Way must not be used for construction or maintenance traffic
- Frequency and volumes of construction traffic must be communicated to all residents in advance
- Frequency and volumes of maintenance traffic during operation must be communicated to all residents in advance

## **Noise during construction and operation**

We expect there to be significant levels of noise from transportation, piling and other activities

- Expected noise levels and durations during construction must be published with the submitted plans, together with mitigation measures to manage this

- Plans to manage and mitigate noise in operation of battery storage and any other equipment must be provided.

### **Wildlife and biodiversity**

DRD has stated a commitment to 10% biodiversity net gain, which is not a requirement of NSIPs.

- We require absolute assurances that this commitment will not be diluted
- We want assurances that net gain does not come at the expense of existing species and populations of wildlife (e.g. that some species are sacrificed, while allowing proliferation of introduced species that may be detrimental to local ecology)
- The plans should include how existing wildlife corridors will be maintained, and show how new corridors will be established and maintained.
- On-going biodiversity management plans and practices should be published, for example will DRD adopt the principles of BS 8683:2021 in the design and implementation of biodiversity net gain?
- The Fleam Dyke is an SSSI, and any potential impact of the development on this must be fully assessed

### **Hydrology**

The chalk aquifer in Cambridgeshire is unique, and the region relies on this for its drinking water. The area is water stressed and any risk to the contamination of the aquifer must be safely contained.

In addition there are areas subject to local flooding, which need special attention in terms of increased run-off and existing drainage capability.

- The risk of groundwater contamination from damaged panels should be quantified and presented at the earliest stage, with mitigation measures as part of the plans.
- The risk from a catastrophic failure of battery equipment should be quantified, with containment and clean up practices included in the plans
- Kingsway should state their level of confidence that the aquifer will not suffer any contamination from the solar farm over its entire lifetime.
- Areas at risk of surface water flooding should have proper ameliorations set out in the preliminary plans
- Appropriate plans for water runoff and drainage that do not compromise the aquifer are required

### **Heritage**

The area is full of ancient heritage sites and routes, including the Roman Road (adjacent to land area A), the Fleam Dyke (a Saxon fortification adjacent to land area B) and the Icknield Way (an ancient route across southern England passing through and

adjacent to land areas B and C), and other features. There are also ancient burial mounds on the boundary of land area A. Land area C is reported to contain remains of a Roman villa and Roman well, and the Moat House at Weston Colville is a scheduled monument.

- The development plans must show how the unique heritage of the area will be protected, respected and, where possible, enhanced.

### **Local economy**

The development will impact local agricultural jobs, and transform the nature of the local economy and long-standing ways of life. There are also emerging assessments of the impacts on local house prices.

- Evidence should be presented that shows how large scale solar farms are likely to impact the local economy
- The plans should include an assessment on the impact to local jobs, and how these can be replaced by new skilled and unskilled work in the area
- Full account must be taken of the emerging evidence on house price impacts, with a presentation of the evidence and its provenance.

### **Land use, recovery and whole life impacts**

KSCA understands that the local agricultural land is considered Best and Most Versatile, which the guidelines state should be avoided. If the local land is repurposed for solar PV generation this may displace agricultural activity to other areas, with subsequent change in land use there.

KSCA are also concerned that the land may be reclassified, which may reduce its ability to be used for agriculture in future. We understand the aim from Downing is to reinstate the land to its former condition at the end of life. However, there will be concrete pilings which will require to be removed, with significant disturbance to the land and possible degradation of soil quality.

The project is part of the drive to net zero, and the construction process will include transport and other embodied carbon emissions. Best practice for net zero infrastructure projects now exist such as PAS 2080:2023.

- DRD should include analysis of potential agricultural displacement activity in the preliminary plans
- Assurances should be given about the ability to return the land and its soil condition to its former state upon decommissioning
- Given the project is part of the drive to net zero, DRD must show how the entire project life cycle will be net zero, including all embodied carbon. Lifetime emissions should be published, together with proposed mitigations. Using the zero carbon emissions of the solar farm generation as offset will not be sufficient, as these will be incorporated into the national carbon budgets.

- DRD should commit to adopting best practice for net-zero construction such as PAS 2080.

### **Grid connection**

We understand from David Vernon that the grid connection to Burwell South will be built and owned by DRD, and that this will be sized to carry the peak capacity of the solar farm and its battery storage, and that no provision will be made for connection of future generation assets to this connection. There is some question over when the Burwell South grid connection will come on stream.

- KSCA are seeking assurances that no future generation potential is to be built into the design and, as far as DRD is concerned, this will be the sole development of its type in this area
- DRD should explain how any delay in the plans for Burwell South might impact the timelines of the Kingsway project, and whether any work would start on construction of the solar farm before Burwell South becomes operational.

### **Community compensation**

KSCA were advised by David Vernon that no commitments were being given in terms of financial community benefits or compensation, and that these are an explicit subject of this non-statutory consultation process. This is extremely challenging for us as there is no single coordinating body responsible for gauging community opinions and wishes on this, nor one able to negotiate a reasonable position for the wider community. A piecemeal response from this consultation cannot provide an optimum solution for the communities. We were also advised by David Vernon that direct sales or subsidies of electricity to local residents would not be considered under any circumstances.

The community is left entirely powerless as there is no mechanism, currently, to safeguard the interests of those most impacted. This despite the fact that compensation schemes are mandated in Scotland, and are being developed within the government for England. Also under consideration by the government is the ability of communities to access lower priced electricity. For this project to proceed without consideration of these potential legislative developments would seriously undermine public trust in developers' approaches to impacted communities.

- Community funds of the order of £5000/MW are considered in other developments, and this would be KSCA's recommendation to any negotiating body
- Electricity sales could be made possible (direct or indirect), via some appropriate mechanism. If this is not to be considered DRD should explain in detail why this is not possible. The current position that this is not the current DRD business model is an inadequate explanation.
- Any compensatory arrangements must be in addition to maintaining existing landscape, biodiversity measures and minimising other impacts.