

BALSHAM PARISH COUNCIL

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Downing Renewable Developments Llp / Kingsway Solar Farm Limited
10 Lower Thames Street,
London,
EC3R 6AF

28th October, 2025

Dear Sir/Madam,

Re: Response to Kingsway Solar Farm Stage Two Consultation document

Balsham Parish Council has reviewed the Kingsway Solar Farm Stage Two Consultation documentation, considering in particular how the Preliminary Environmental Information Report (“PEIR”) has addressed the principal concerns raised by the Balsham Parish Council in the initial scoping consultation response of January 2025 (appendix 1).

In assessing the documentation published and following a meeting with the Downing Renewable Developments (“DRD”) Head of NISP Projects, the Balsham Parish Council has concluded that the ***PEIR fails to address the majority of our concerns.***

The reasons for this decision are addressed below:

1. Groundwater and aquifers

We stated that ‘*full assessment of ground-mounted solar PV on chalk aquifer to be scoped in*’ and ‘*A more rigorous evaluation of risks, detailed mitigation plans, and justification for the BESS location near residences and critical water sources must be included in the EIA and ES.*’

The PEIR response to these points **is inadequate:**

- The PEIR fails to address the groundwater risk and has not conducted a full contamination modelling of the areas.
- The receptor summary relating to groundwater issues labels the sensitivity / value from low to high with no proper analysis or discussion in the rationale, nor how this will be mitigated to resolve the issues.

- The sensitivity values are assumptions and not based on actual site survey data as briefly described in 9.3.32 *Assessment Approach* [PEIR Volume 2 Chapter 9: Land and Groundwater Quality](#).
- These assumptions are further documented in section 6.3 *Data Gaps and Uncertainties* [PEIR Volume 4 Appendix 9.2 Risk Geosciences Preliminary Assessment Part 1](#)

Action:

There must be a hydrogeological risk assessment conducted on all areas in particular those identified as BESS areas (appendix 3).

2. Land use, landscape and visual impact:

We stated that *“Greater transparency and independent validation of the survey methodology are essential, along with a more compelling case to demonstrate that non-BMV land was not a feasible alternative.”*

We also identified the ecological importance, biodiversity enhancements and priority habitats in the proposed areas. Likewise, we indicated that a detailed visualisation of the proposed screening and other mitigations are required to minimise the impact on the landscape, and sites of historical importance such as Balsham Fleam Dyke, Icknield Way, the Roman Road and Borley Wood (appendix 2).

The PEIR **does not** address the justification for the permanent loss of best and most versatile (“BMV”) land and gives little to no information regarding the adverse effects to the landscape and visual impacts.

- The PEIR states that the *“changes to the land used for the PV Array and other temporary facilities will be reversible, and the soil will be managed and reinstated to the pre-existing soil quality and ALC grade”* (section 10.2.30 *Significance of effect relating to agricultural land quality and soil ecosystems* [PEIR Volume 2 Chapter 10: Soils and Agriculture](#)).
 - o This statement is unproven and there are no guarantees provided in the PEIR as to how this land will be reinstated to its former state.
- The PEIR has not conducted a detailed ALC survey, as acknowledged in sections 10.2.31 and 10.2.32 *Significance of effect relating to agricultural land quality and soil ecosystems* [PEIR Volume 2 Chapter 10: Soils and Agriculture](#). It provides assumptions that have been made about the soil quality based on provisional ALC data of the area.
 - o The agricultural land varies across the proposed sites, such that chalk and soil depths have not been properly tested and without accurate data, the plan cannot adequately mitigate the impact of the construction.
- The PEIR does not fully address the visual, landscape and ecological impacts, as acknowledged in section 7.7 *Likely Significant Residual Effects* [PEIR Volume 2 Chapter 7: Landscape and Visual Amenity](#), therefore not giving residents the opportunity to address any further concerns during this consultation stage.

Actions:

- I. **There must be a detailed Soil Management Plan and Landscape and Ecological Management Plan before any consent is given to this project.**

- a. Full detailed plans and guarantees for the screening and restoration must be provided.
- II. A sequential site assessment must be conducted to demonstrate that there are no alternative sites, which offer more suitable lower grade land, that would be more appropriate for this type of development.
- III. The assessment must provide detailed justification for choosing high-quality BMV land over National Planning Policy (NPPF and EN-3) guidance.

Traffic and construction impacts

We stated that the plan required detailed information regarding access roads and proposed routes, in addition to limiting construction hours to protect residents from noise, pollution and a significant increase in traffic in our area.

In addition, in our response of January 2025, we provided details of a recently approved anaerobic digester (appendix 4) which we noted would have significant impact on the traffic in Balsham, due to the construction and increased HGVs and farm machinery.

The PEIR **does not** address the concerns raised in our response, nor does it provide complete information about traffic management, emergency access or noise / construction pollution.

- The PEIR does not acknowledge the construction phase or operational cycle of the anaerobic digester near the proposed area.
 - The proposed operational hours of the anaerobic digester are similar, if not the same as those proposed for the solar farm construction phase.
 - The proposed routes identified for the solar farm construction phase are the same as those identified by the Streetly End Farm Anaerobic Digester.
 - The significant increased volume of HGVs on rural and village roads poses substantial risks to the current poor highway / road conditions and general road safety.
- The PEIR does not provide a Construction Traffic Management Plan (“CTMP”) and it states this will only be provided as part of the Development Consent Order.
 - Assumptions have been made that “the majority of construction workers [will] arrive and depart outside of highway peak hours”, (section 11.5.17 *Preliminary Assessment of Likely Significant Environmental Effects* [PEIR Volume 2 Chapter 11 Traffic and Transport](#)) however overlooking the significant volume of commuter traffic on the same rural and village roads, at the same times as their construction workers arrival and departure times.
- The PEIR specifies numerous highway links but fails to make any mention to an emergency access strategy for fire and rescue services, nor addresses the significant impact of construction traffic on these potential routes.

Actions:

- I. A Construction Traffic Management Plan must be finalised prior to any further project submissions.
- II. The Construction Traffic Management Plan must address an emergency access strategy, particularly as risk of lithium battery fires poses substantial health and safety risks to residents and the immediate areas.

- a. In addition, an emergency at any of the proposed sites will have a significant impact on the surrounding roads and infrastructure – until the incident can be safely contained and managed.

3. Community benefits

We stated that the “*socio-economic impact should be included in the EIA, with the applicant required to explain how they plan to mitigate such effects.*”

The PEIR **has not** addressed this concern.

- Following a BPC meeting with the Head of NISP for Downing Renewable Developments we were informed:
 - Any community benefits proposed are separate to the plan and outside the scope of the DCO.
 - That there is no requirement for benefits to be provided under the existing legislation.
 - That the amount proposed is dependent solely on the Head of NISP.

Actions:

- I. **The Kingsway Solar Farm Project must consent to a binding agreement to provide a community fund that benefits the residents in and around the proposed development areas.**
 - a. **This must include the establishment of a formal mechanism to manage the community benefits.**

[BPC Signature]

Appendix [to be added from previous response]

1. Response from Balsham PC for scoping document 13-01-2025.pdf
2. Impacted views from Balsham.pdf
3. Hydrology advice.pdf
4. Notes on Streetly End Farm Anaerobic digester.pdf