



From: Martin Baker

Sent: 27 October 2025 12:08

To: enquiries@kingswaysolar.co.uk

Subject: Stage 2 Consultation October 2025

Dear Kingsway Team,

This email is a formal response from the Wildlife Trust BCN, in relation to your October 2025 consultation on the Kingsway Solar Park proposals. At this stage, due to constraints of time, the comments are restricted to selected aspects of the proposals and do not represent a full consideration of the whole scheme. We reserve the right to make more extension comments in future and if necessary to object to any proposals submitted as part of a formal application for permission.

Overall Scheme

The proposals presented in the current stage 2 consultation include an industrial-scale solar park covering over 400 Ha of arable land in South Cambridgeshire between the villages of Balsham, West Wratting, Weston Colville, Carlton, Brinkley and Six Mile Bottom. In addition, a new pylon route is proposed north towards Burwell. While the stage 2 consultation scheme appears to represent a significant reduction from stage 1 consultation, where the prospect of a 1200 Ha solar park was presented, it still none-the-less represents a significant loss of land for food production and in the absence of a land use strategy, it is far from clear that this scale of solar development represents the best, or most sustainable use of the land.

Nature Sites

The scheme largely avoids direct impacts on nature sites. The Wildlife Trust is pleased to see that Fleam Dyke SSSI and its surrounding land has been avoided in the latest solar park layout. The scheme is also set back from Great Coven's Wood County Wildlife Site (CWS) and Hill Croft CWS, due to the 50 metres buffer adjacent to all woodlands. South of Hill Croft CWS, there is a recently identified small ancient woodland site, that meets the criteria for a County Wildlife Site. A wedge of solar panels is located between these two sites, however a 50 metres wide buffer is included adjacent to the woodlands. Other ancient woodland SSSIs and CWS in the wider area have been recognised and the scheme avoids these.

However, the scheme also directly abuts two other County Wildlife Sites, Old Cambridge Road Verges and West Wratting Valley Farm Road Verges. The proposed sub-station is located adjacent to Old Cambridge Verges and the pylon route will cross this site. There would therefore appear to be a high chance of both direct and indirect adverse impacts on this site from construction activities, and

depending on access routes, ongoing operations. If this scheme proceeds, it will be essential that the County Wildlife Site verges are protected from adverse impacts such as use as construction access routes or from dust. However, provision should also be made for their enhancement through better management, and buffering / extension of each site through the creation of species-rich grassland.

The new pylon route is shown as crossing Devil's Dyke SAC, SSSI. The pylon route will also cross Burwell Disused Railway CWS (though this may make use of the existing pylon connection route as opposed to be an additional route). The fields either side of the Devil's Dyke and Burwell Disused Railway have been identified as one of the top priorities in East Cambridgeshire for nature recovery action and in particular the creation of species-rich chalk grasslands to buffer and extend the internationally important Devil's Dyke. It is essential that should this scheme proceed that any new pylon routes do not compromise the nature recovery ambitions.

Arable Plants

The ecological surveys have identified that the proposed solar park site is of national importance for rare arable plants, particularly Parcel A, Parcel B1 and Parcel B2. Following the refinement of the scheme design, solar panels are no longer proposed for Parcel B2, however those in Parcel A and Parcel B1 are still impacted.

While a summary of the data for each parcel has been provided, I could not find information on the location of the individual field margins surveyed and therefore where each of the notable arable plant species are located. This information is essential to understanding the impacts of the proposals, and whether / how the scheme has been designed to avoid impacts of these rare species assemblages.

The maintenance of the populations and distributions of the nationally important assemblage of rare arable plants will require continued and sensitive, nature-friendly arable farming. With solar panels now proposed over 436 Ha of the original 1200+ Ha site there is potential to avoid impacts in the first place, though it is not clear if this has been done. It is also not clear what is proposed for the land not allocated to solar panels. Will arable farming be continued over a significant part of the area, and if so, does this include fields with nationally important arable flora, or if not, how will the arable land be managed to support the nationally important plant populations lost from other parts of the site?

Breeding Birds

The bird surveys have identified that the area supports significant populations of farmland breeding birds, including in terms of numbers of breeding species (64 recorded) and in terms of numbers of territories of individual species. Breeding populations of Corn Bunting, Grey Partridge, Skylark and Turtle Dove are of County importance, while Linnet and Yellowhammer are of district importance. Two to four pairs of Lapwing were also noted as possibly breeding.

For species that nest within hedgerows, scrub or woodland and feed on arable field margins or grassland, the solar park is unlikely to have significant adverse impacts, so long as breeding habitats such as hedgerows are retained and well-managed and there is a good supply of seed and insect food within arable field margins and species-rich grassland. However, for species such as Skylark and Lapwing that nest in open landscapes, the solar park is likely to have adverse impacts. Skylarks will not nest or nest at much lower densities among solar panels than across open farmland or grassland habitats. The breeding bird survey identified 114 pairs of Skylark across the site and this is likely to become much reduced should the solar park be built. New hedgerows or planting proposed to help

screen the solar park from properties may also further reduce the area of suitable habitat for skylarks.

A detailed analysis must be undertaken of the impacts of the proposals on the local Skylark population. How many territories will be impacted by and lost to fields of solar panels? How many territories could be supported in the non-developed part of the site taking account of continued arable farming, proposed new grassland and woodland habitat creation and hedgerow and tree planting. If the number of territories can not be increased in the non-solar park area, what off-site measures will be implemented in the surrounding landscape to maintain the local Skylark population and how will these be legally secured throughout the lifetime of the solar park?

In addition, for the Turtle Dove, a rapidly declining breeding species, it will be essential to design the scheme to avoid impacts in the first place. It is unclear whether or how this has been done in the design of the southern Parcel A, where the Turtle Dove appears to have been recorded. The species requires suitable scrub / dense hedgerow habitats for breeding, seed rich foraging areas including species-rich grassland and various types of enhanced arable field margins and a nearby water supply, e.g. ponds. If the solar scheme proceeds, specific habitat enhancements must be provided to support and encourage an expansion of the Turtle Dove population.

Nature Recovery

The area adjacent to Fleam Dyke and Devil's Dyke are two of the top priorities in the County for nature recovery and the creation of species-rich chalk grasslands. By avoiding the area immediately adjacent to Fleam Dyke the solar park will not compromise the long-term nature recovery ambitions in this location. Likewise, the pylon route crossing the Devil's Dyke should not compromise the creation of chalk grassland, though it will introduce additional predator perches and therefore limit the potential for future chalk grassland habitats to support ground nesting bird species.

Should the solar park proceed, both of Parcel A and Parcel B should make an active contribution to nature recovery for arable plants and breeding farmland birds and could also contribute to restoration and creation of a larger area of species-rich chalk grassland to buffer and connect the few remaining and isolated chalk grassland sites, such as the road verge CWS.

The northern part of the scheme (Parcel C) is adjacent to and partly within the Boulder Clay Woodlands priority area of the East Cambridgeshire Nature Network. There could be opportunities to actively contribute to wider landscape-scale biodiversity enhancements through the creation of well-located woodland, scrub and hedgerow habitats, and through species-rich grassland and pond creation. In addition, there are opportunities to undertake natural flood management and catchment sensitive farming at the headwaters of the River Stour and along other watercourses.

Should the solar park go ahead, it must demonstrate a landscape-scale approach to biodiversity enhancements with the right combination of habitats in the right locations, alongside continued nature-friendly arable farming.

Conclusion

Further work is required to demonstrate how the Kingsway Solar Park proposals represent a sustainable use of land with such a large-scale loss of arable farmland. Further work is required to demonstrate how the scheme has avoided impacts on nationally important populations of rare arable plants, on breeding farmland bird populations of county and district importance, and where impacts have not been avoided, how the scheme will deliver effective mitigation or compensation

measures. Continued and nature-friendly arable farming will be essential to the continued presence of many of these species in the local landscape.

Detailed design work will need to be undertaken to show how such a large solar park can effectively contribute to landscape-scale nature enhancement. This will require effective management of the land throughout the lifetime of the solar park, with monitoring and adaptive management based on monitoring results. It is likely that local landowners would be best placed to deliver an effective management solution which must be clearly set out from the outset. Too many solar parks promise the earth and fail to deliver the biodiversity enhancements promised at application stage.

Finally, it will be essential that the biodiversity enhancements and habitat creation delivered as part of the solar park are secured for the long-term and beyond the 40 years “lifetime” of the solar park for a truly sustainable outcome.

Yours sincerely,

Martin Baker

Conservation Manager