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Electronic submission only

Dear Andrew,

Response of South Cambridgeshire District Council to the Targeted Consultation for Kingsway Solar Farm Development Consent Order (DCO) – January 2026

Thank you for the opportunity to comment on the proposed design changes to Kingsway Solar Farm, presented by way of targeted consultation. The Council acknowledges receipt of the Section 42 notification letter and notes that the consultation period runs from 7 January to 4 February 2026.

Having reviewed the material provided, the Council remains concerned that significant changes have been brought forward without the necessary accompanying technical information. As a result, the Council is unable to form an informed view of the likely significant environmental, landscape, heritage and ecological effects arising specifically from the changes subject to this targeted consultation. Further, given the previously identified shortcomings in the information presented at earlier stages, it is not possible for the Council to compare the effects of the previous scheme and the amended scheme, or to determine whether the amendments are appropriate. Our detailed comments are set out below.

Changes 1 & 4: Development Area A

The proposed panel field in A1 raise additional heritage, landscape and visual impacts, particularly in relation to Grade II Listed Worsted Lodge, its setting, and the Worsted Street Public Right of Way.

At Statutory Consultation, this area was explicitly identified as unsuitable for panel placement due to its heritage sensitivity, and exposure to visual receptors from the A11. It was instead presented as an opportunity for landscape and biodiversity enhancement.

Change 4 shows an enlargement of the substation footprint to the southwest of the development area.

In the absence of updated technical assessments, the Council cannot evaluate whether the inclusion of additional panel field 'A1' or the enlargement of the substation is justified or acceptable. As such the Council is concerned about the likely significant environmental effects arising from these changes.

Change 2: Development Area B

The introduction of panel fields B1 and B2 gives rise to additional heritage and landscape concerns. The impact on settings of designated heritage assets including Dotterell Hall Barn, Grade I Holy Trinity Church and the Balsham Conservation Areas, and West Wratting Conservation Areas may be further exacerbated by these changes. Additionally, in landscape and visual terms, the additional B1 and B2 panel fields lie in a central location which currently benefits from clear views from the Harcamlow Way and Honey Hill (B1052). The inclusion of screening vegetation would alter the open character of this area which is characterised by wide views and rolling topography. Clear visualisations are required to assess the impacts.

Change 3 & 6: Development Area C

The removal of panel fields C2, C3, and C4 is supported in principle from a heritage perspective as this would allow for a separation between the panel arrays and the Grade II* St Mary's Church and Grade II Listed Weston Colville Hall.

However, the Council has significant heritage concerns with the other changes proposed in this area which include new panel fields C1 and C2, and an increase in footprint of the substation. These changes affect the setting of the aforementioned heritage assets, as well as West Wratting Conservation Area, and Grade II* West Wratting Hall. The siting of Bull Lane substation within Development Area C is of particular concern given its impact on designated heritage assets within close proximity.

It is understood that the substations could potentially reach 12m in height which, when combined with the increased footprints proposed under this consultation, has the potential to give rise to significant effects. The Council is unable to determine the scale or degree of any harm as the supporting baseline heritage assessment has not been provided. Alternative

locations should be considered, and further evidence supplied demonstrating why this location is the most appropriate.

The addition of panel field C1 raises significant concern due to the overall scale and extent of land coverage proposed. This area is crossed by the Icknield Way and other Public Rights of Way (PROW) which are characterised by their open nature and long-distance views. The prominence of the panel fields and the enclosure made up of security fencing and vegetative screening will negatively affect the experience of users of the PROW. To date, no substantive information has been provided on appropriate vegetative screening or other mitigation strategies.

Clear visualisations will be required to assess these matters fully.

Change 5: Enlargement of the Battery Energy Storage System (BESS) Compound

The consultation material indicates a significant increase in the footprint of the BESS compound but provides no technical detail regarding height, massing, ground levels, cut-and-fill requirements or visual impact. Given the topography of the site, this omission is significant. The Council considers that additional scaled plans, cross-sections, presented in clear Above Ordnance Datum (AOD) are required to understand the implications of the proposed enlargement.

In the absence of these details the Council cannot reasonably assess the likely effects on landscape character, designated heritage assets (including Scheduled Monuments), and the network of Public Rights of Way which provide historic and visual connections between villages and conservation areas.

General project position

The Council remains concerned that the project continues to progress towards Development Consent Order submission without the provision of sufficient technical information to support assessment. Despite ongoing engagement, including Technical Working Groups, the information shared to date remains limited and incomplete. This position applies particularly across heritage, biodiversity, landscape, health, and grid connection matters.

Heritage impacts

As mentioned above heritage impacts may now be more significant than what was presented at the previous consultation. As no Heritage Impact Assessment has been provided, and

previously raised concerns from Statutory Consultation remain unaddressed, this is now an area of key concern for the Council.

Biodiversity impacts

Information relating to ecological impacts and mitigation remains has not been shared with the Council, with some surveys still ongoing and no clarity on impacts on protected species or mitigation strategies. The Targeted Consultation materials also do not address earlier concerns regarding Biodiversity Net Gain and vegetation removal for haul routes. As a result, the Council is unable to assess ecological effects or be assured that effective mitigation and Biodiversity Net Gain would be secured.

Pylon corridor and grid connection

The Targeted Consultation provides no information on refinement of the pylon route, height, or design. The Council has separately reviewed draft Order limits, which raise concerns regarding the proposed routing around Devil's Dyke, the use of 'A-frame' pylons at approximately 55–65 metres in height, and visibility across sensitive landscapes including the Gog Magog Hills and Cambridge Green Belt. The proposals are likely to result in significant adverse effects on long-distance views across both South Cambridgeshire and East Cambridgeshire.

Technical Working Groups and programme

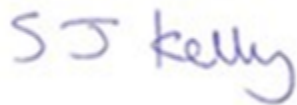
While the establishment of Technical Working Groups is welcomed, the level of information currently under discussion reflects an early stage of engagement. Key matters remain unresolved, including heritage, biodiversity, health impacts, and the scope of the Health Impact Assessment. At this stage in the programme, this raises concern about whether the application is being properly prepared for submission.

Conclusion

The cumulative impacts arising from additional panel fields, enlarged infrastructure, and the grid connection corridor remain a significant concern to the Council. No updated technical assessments or PEIR addendum have been provided to support the proposed changes. As a consequence, the Council's position remains unchanged. Engagement to date has not provided sufficient information to reach an informed view on the likely significant environmental effects arising from this project including the information provided as part of the Targeted Consultation. Proceeding to submission on the current timetable would carry

avoidable risk for all parties. The Council therefore considers that a delay to the anticipated DCO submission date is necessary to allow for effective and meaningful engagement on outstanding matters.

Yours sincerely,



Stephen Kelly
Director of Planning & Economic Development
On behalf of: South Cambridgeshire District Council

Enclosures:

Appendix A – Targeted Consultation – Technical Officer Response Table

Appendix A.

Application by Downing Renewable Developments for an Order Granting Development Consent for the Kingsway Solar Project (PINS ref: EN010165)

TABLE 1: Response to Targeted Consultation January 2026

Technical area/Topic	Comments
1. Landscape	<p>The targeted consultation outlines at a very high/conceptual level of detail changes to the solar array field locations and the scale and distribution of the BESS(s) and Substations.</p> <p>There are concerns from landscape over the additional fields identified in Development Area A – west and the visual and landscape impacts this may have on the listed Worsted Lodge and Worsted Street Public Right of Way and it's setting. There were already concerns relating to the use of much of Development Area A due to the impacts on Worsted Street and clear visualisations will be required to assess.</p> <p>There are concerns about the addition of Fields B1 and B2 in Development Area B – Central due the adjacency of and clear views from the Harcamlow Way and Honey Hill (B1052). The inclusion of screening vegetation would alter the open character of this area which is characterised by wide views and rolling topography. Clear visualisations are required to assess the impacts.</p> <p>There are concerns about the addition of Area C1 to Development Area C due to the overall scale and coverage of the land. The area is also crossed by the Icknield Way and other Public Rights of Way which are characterised by their open nature and long views and which will be negatively affected by the enclosure made up of security fencing and vegetative screening required by panel fields.</p> <p>The enlarged substation and Bess in Development Area B (Change 5) is much larger by comparison but it is not clear what it looks like or how it might impact views from Six Mile Bottom, Lark Hall Corner Road and PROWs in</p>

	<p>the vicinity. There are expected earthworks which may accompany such a large feature and how this is treated in the landscape will also be required for assessment. Clear visualisations are required to assess the impacts.</p> <p>Visualisations of the remaining BESS amendment areas will also be required to assess the impacts.</p>
2. Built Heritage	<p>The information for review under this targeted consultation is very limited. There is no updated built heritage assessment.</p> <p>Clarification about scale and appearance has previously been requested and has not yet been provided in writing or on plan. 1.Substations: the verbal confirmation of 12 metre heights in addition to the increased footprints under this consultation give rise to potential significant effects. There is particular concern about the location of Bull Lane substation in Area C and the potential harm arising from this development in the setting of designated heritage assets. Alternative locations should be considered. 2.Solar arrays: Are the images on page 5 and 9 misleading? They do not seem to correspond to the scale of the arrays previously described with heights up to 4.2 metres.</p> <p>Change 1: There are serious concerns about the inclusion of A1. A1 was previously an area set aside for heritage, landscape and ecology mitigation. A1 is close to Worsted Lodge grade II listed building and curtilage listed former farmstead, and the Worstead Street Scheduled Monument, and appears to form part of the assets' settings. No assessment of impact or potential mitigation has been provided. The statement that the field has 'limited constraints' is not evidenced in this consultation.</p> <p>Change 2: Areas B1 and B2 have the potential to affect or increase impacts on the setting of designated heritage assets including Dotterell Hall Barn, grade I Holy Trinity and the Balsham Conservation Areas, West Wratting Conservation Areas. There is insufficient information to determine the scale or degree of any harm.</p> <p>Change 3 & 6: Serious concerns remain about Developable Area C. The removal of the C3 fields is welcome as this puts a greater distance between arrays and grade II* St Mary's Church and grade II Weston Colville Hall. Again, however, no assessment of impact or potential mitigation has been provided. There are serious concerns about the C4 sub-station location and increased size, and inclusion of field C2, in relation to the setting of the above assets, West Wratting Conservation Area and grade II* West Wratting Hall.</p>

	Concerns previously raised remain relevant. Please refer to built heritage comments made under the previous consultation.
3. Biodiversity	<p>There is no further ecological formation to review in the documents provided by the developer. Therefore, all concerns previously raised regarding ecological and biodiversity constraints remain and are presented here below:</p> <p>SCDC considers that the current information provided is inadequate and requires the Applicant to:</p> <ul style="list-style-type: none"> • Provide a detailed assessment of all statutory and non-statutory protected sites within 2 km of the proposed development, including site-specific impact evaluations and mitigation measures; • Update ecological surveys to ensure all protected and priority species are adequately assessed, with particular focus on ground-nesting birds and their breeding habitats; • Clearly define hedgerow and tree reinstatement timelines and include this within the impact assessment methodology; • Reassess construction-phase impacts on badgers, including haul roads and temporary disturbance factors; • Treat ground-nesting birds as a distinct receptor within the ecological impact assessment and provide appropriate mitigation; • Commitment to delivering at least 20% Biodiversity Net Gain in line with Greater Cambridge policy expectations; and • Secure BNG measures for a minimum of 30 years through a Section 106 agreement. <p>Until these matters are addressed and the necessary ecological information is provided, SCDC does not consider that the Applicant has demonstrated that the impacts on biodiversity and protected habitats can be fully understood or acceptably mitigated. The proposal has therefore failed to demonstrate that the ecological impacts of the proposed development have been identified and that any potential adverse effects have been addressed in the schemes design and mitigation.</p>