

***BALSHAM PARISH COUNCIL***

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Deb Glassop  
EIA Advisor, on behalf of the Secretary of State  
Environmental Services  
Operations Group 3  
Temple Quay House  
2 The Square  
Bristol  
BS1 6PN

13<sup>th</sup> January, 2025

Dear Ms Glassop,

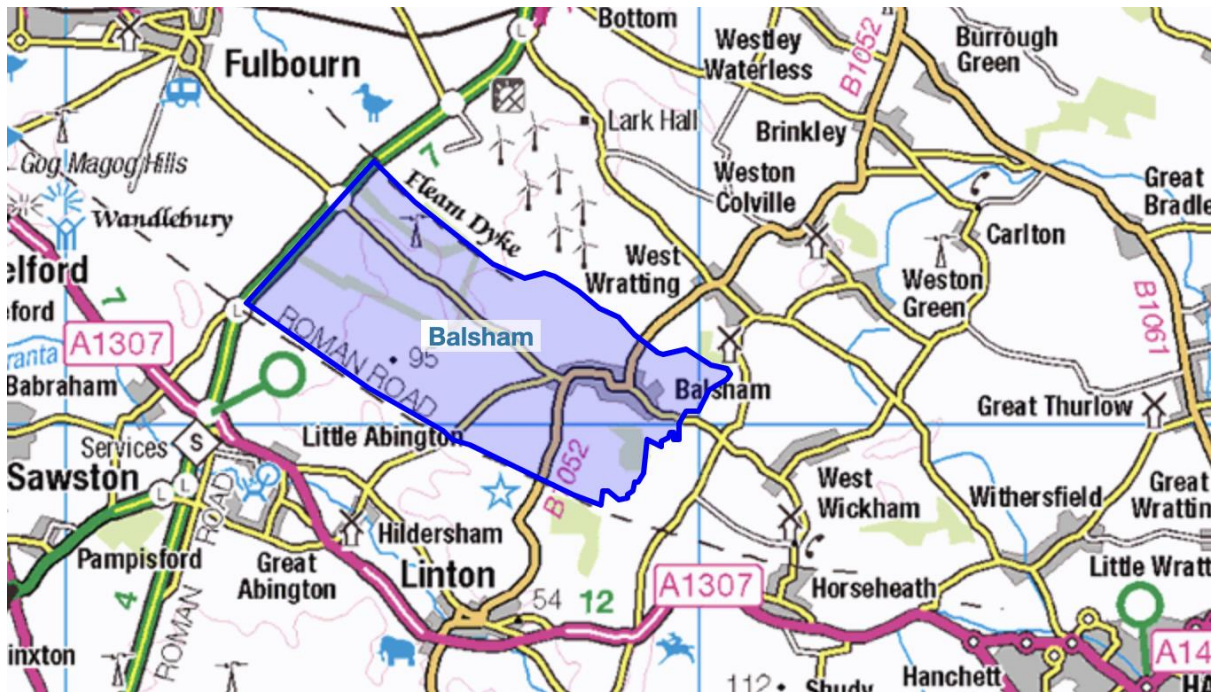
**Application by Kingsway Solar Farm Ltd – Scoping Consultation**

Balsham Parish Council has read and reviewed Kingsway Solar's Environmental Impact Analysis Scoping Report and has had input from concerned residents.

**About Balsham**

Balsham is a parish located southeast of Cambridge, covering 1831 hectares of undulating farmland. The terrain rises from the A11 in the north to the village centre in the south. Roman roads form the west and south boundaries, Fleam Dyke lies to the northwest, and one of the Icknield Way tracks marks the northern edge. The village itself is situated along a single main road, with the church occupying the highest point of the area. The surrounding landscape includes farmland used primarily for arable crops such as wheat, barley, sugar beet, and rapeseed, with some pasture for sheep and cattle. Known as "Balesham" in the Domesday Book, it blends 16th-century cottages with modern homes, expanding significantly since the 1960s.

With about 1,600 residents, Balsham features a primary school, post office, café, two pubs (the Bell and the Black Bull), and arable farms growing wheat, barley, sugar beet, and rapeseed. Its active community supports clubs, sports teams and local trades.



[Balsham Parish Map](#)

### **Concerns about the EIA scoping report**

The scoping EIA report for the Kingsway solar farm contains several difficulties and uncertainties. Key design details, such as the layout and positioning of solar panels and batteries, remain undecided, with the applicant using the ‘Rochdale Envelope’ approach to delay final decisions until after the development consent order (DCO) is issued. There is also ambiguity regarding the overlap of land use with Wadlow Wind Farm (area B), raising concerns about potential impacts on Fleam Dyke.

The report seems rushed, with errors in references, outdated sections, and inconsistencies reflecting changes in the scheme. Some content appears copied from other solar farm documents, which undermines confidence in its accuracy.

### **Location of solar farm**

Areas A and B were initially selected for their proximity to grid infrastructure, but the plan now includes a 15 km pylon link to an unbuilt substation, with the justification shifting to landowner agreements (and inclusion of Area C). These areas, situated in a rolling rural landscape near historical features like Fleam Dyke, make it difficult to minimize environmental and visual impacts (see Landscape and visual amenity and Cultural heritage). The underlying chalk aquifer raises safety concerns about battery storage (see BESS safety). The site selection process seems to overlook local planning policies such as the Local Plan.

### **BESS safety**

The scoping EIA report proposes excluding major accidents and disasters, including Battery Energy Storage System (BESS) fires, from further assessment, despite acknowledging significant fire risks. This dismissal is inadequately justified, ignoring the severe, potentially catastrophic impacts of BESS fires, such as toxic hydrogen fluoride emissions and contamination of firewater, which is particularly concerning over a principal chalk aquifer supplying regional drinking water.

*Action required:* 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.

### **Land use**

The scoping EIA report claims that 45.9% of areas A and B consist of grade 3a or better agricultural land, classifying it as Best and Most Versatile (BMV), despite previous classifications identifying all the land as BMV. This downgrading, based on an unreferenced Agricultural Land Classification (ALC) survey from spring 2024, raises doubts about its validity, especially given similar inaccuracies in other projects.

Planning rules usually suggest avoiding BMV land unless no other options are available. While solar farms offer clean energy, they take away land that could be used for farming. It's important to carefully consider the impacts on the environment and community when using BMV land for solar projects.

The importance of protecting BMV land is minimized, with the argument that policy permits its use under certain conditions. However, the scheme acknowledges significant negative impacts on BMV land throughout all stages of development. The reasoning for choosing BMV land over less valuable alternatives near a grid connection is weak and lacks a thorough examination of other options.

*Action required:* 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.

### **Hydrology**

No account has been taken of the effect of solar panels on the proportion of precipitation which soaks into the chalk aquifer. Without design and mitigation, there will be some loss to the aquifer, which is serious, as firstly it provides 99% of our drinking water, and secondly, it is the source of Cambridgeshire's rare and important chalk streams. Even a small percentage effect could matter with the very large area of panels proposed. See attached document 'Hydrology Advice'. The first figure in that shows that Area A and part of Area B are within the 'Fleam Dyke Catchment Area'. In section 5.2 the EIA Scoping report scopes "water" out, but it only considers "the potential effects associated with the Scheme on flood risk and surface water drainage".

**Action required:** Full assessment of ground-mounted solar PV on chalk aquifer to be scoped in.

### **Landscape and visual amenity**

Section 6.2 of the scoping EIA addresses the scheme's impact on landscape and visual amenity. The scale and geographical extent of the proposed development are expected to result in **significant adverse landscape effects and prolonged visual impacts**. These effects will be most noticeable to nearby residents of villages like Balsham, although the report primarily highlights the impacts associated with area C. The impacts in areas A and B should not be overlooked, given their proximity to sensitive rural settings and historical features.

**2.7.26 Substations:** At both 400 kV and 132 kV, it is anticipated that the required **footprint for each individual on-site substation would be approximately 9,000 m<sup>2</sup>**.

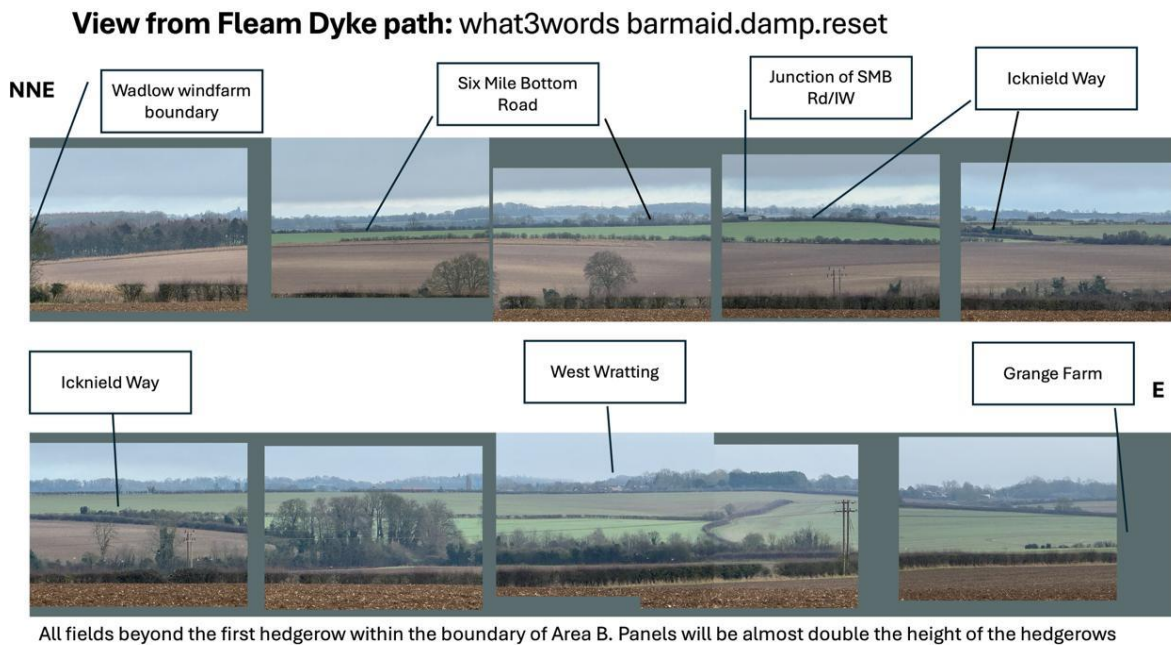
**Action required:** Further refinement is required through the iterative design process to confirm the parameters and location of on-site substation(s) as the design of the Scheme

Section 6 describes the landscape as having rolling, gently undulating hills and clay woodlands with "long distance and open views" across the area. The elevated land in the middle of area B, with its 13 wind turbines, is visible from many miles away, particularly along the Fleam Dyke and Icknield Way footpath. Co-locating the solar farm in this area, as suggested in the plans, would make the new infrastructure highly visible.



*Photo: from the Fleam Dyke towards West Wratting showing the wind turbines on area B*

Balsham residents frequently use the Fleam Dyke and Icknield Way (Fox Road) in Area B, as well as the Roman Road in Area A near Balsham. Both are popular routes for walking, cycling, and other recreational activities. They hold historical significance and local value, contributing to the area's character and providing an important connection to the surrounding landscape. The solar farm will have a significant impact on regular users of these routes.



This is a photo montage of a view of Area B from the Fleam Dyke path showing that screening of this area will be impossible.

The potential of a new construction road discussed in the 'Traffic and Transport' (Page 7) would run through the middle of this picture. Whatever Kingsway does to land area B, and the way they construct it, the impact on the village will be huge. The scoping EIA document does not reflect this or addresses the correct data analysis to assess it.

**Action required:** Detail any access roads and proposed routes.

We believe the impact on residents extends beyond just how the solar farm affects their views. People in rural areas often have a deeper connection to the land they live on compared to urban dwellers. The introduction of large, industrial structures in the green spaces they cherish will cause significant distress and negatively affect their wellbeing.

**Action required:** More details on visual screening and other mitigation measures are needed. This includes the height of the solar panels (with a maximum height of 3.5 metres) will be taller than existing hedgerows and would be difficult to screen. When considering the visual

impact of the solar farm, it is crucial to include the existing 13 wind turbines in area B and the pylons connecting them to the Burwell substation. Failing to consider these developments would overlook key factors already impacting the landscape.

### **Cultural heritage**

Paragraph 2.4.24 of the scoping EIA report states, "there are no listed buildings within the developable areas," which is correct for areas A and B (but not C).

Designated and non-designated heritage assets are less common in areas A and B of the scheme than C, but these areas, along with the grid connection corridor, contain the scheduled monument Fleam Dyke and remnants of sites that were part of a prehistoric funerary landscape (especially area A).

The preservation of prehistoric funerary remnants during the construction of the solar farm is a critical concern. These archaeological features hold significant historical value. Disturbing or damaging them could result in the loss of valuable cultural heritage. It is essential that thorough archaeological surveys are conducted in advance of construction, and any construction activities near these sites must be carefully managed to ensure their preservation.

The impact of a solar farm on Fleam Dyke, a scheduled monument, requires careful management to protect its cultural, archaeological, and environmental significance. Any disturbance could damage its archaeological integrity. Fleam Dyke is an important feature in the landscape, contributing to its sense of place, so visual or physical changes could diminish its value as a historical landmark. This is especially relevant for any connection corridors or cable routes, such as those between areas A and B, as mentioned in section 6.3.9. (See attached photographs to highlight visual impact on historical footpaths in land area B).

**Action required:** In addition to the groups and organizations already mentioned, other interested parties that should be consulted include Cambridge Past, Present and Future (CPPF) and the Fleam Dyke and Roman Road Association (FDRRA). Consultations should include local historians, community groups, and projects like the Balsham Map Project.

### **Traffic and transport**

Chapter 2 outlines the traffic plan, stating that "construction access will be via the four junctions along the A11, then onto the local road network; Six Mile Bottom Road, London Road, Balsham Road, and an unnamed farm access via Worsted Lodge" (2.7.33). These routes are shown on a low-quality map (Figure 2.2, page 37). Since areas A and B are close to the A11, it may be possible to limit use of rural roads by utilizing existing tracks in the wind farm complex and building new access roads within the scheme boundary. However, there is uncertainty about access to areas B and C via Balsham Road, which could lead to increased traffic flows through the village of Balsham. Additionally, the traffic baseline data is inadequate, and the data collection methodology seems unsuitable for capturing the seasonal nature of local traffic and takes no account of the projected anaerobic digester at Streetly Hall (see attached file), which will add significant traffic flows through Balsham.

The A-B area interconnection runs through land outside of the land agreements and across the Fleam Dyke. This should be included within the scope of the EIA.

#### *Specific comments on Section 6.7*

##### 6.7.2

Phasing of construction work is not yet determined, and depot sites are not yet fixed. Therefore, traffic volumes for each route not yet identified, and none are indicated. There seems to be a possibility that these may only be determined post-EIA, and if so, how will this be included in the application to the inspectorate?

##### 6.7.3

There appear to be no DfT count points on the routes into Balsham, which means no baseline data is available for traffic through Balsham. Given that Balsham Road is identified as a major access road (via J2 on Fig 2.2) this seems to be a major omission. Note this road has high volumes of traffic at peak times.

##### 6.7.4

The proposals use the term 'may be required' where data is poor. This should be revised to 'will be required'. There is a statement that collected data will be used in the assessment of annual flows. However, there is much seasonal variation in local agricultural traffic, and neutral 24-hour data cannot be extrapolated to annual traffic flows. Sampling methodologies need to take account of this. It is noted that there is no indication at this stage of construction traffic volumes, which will only be known post-design. The EIA will have to take the full design conditions into account survey.

##### 6.7.5

The Harcamlow and Icknield ways are acknowledged as potential constraints to construction access. The nature of these constraints and plans to address them need to be made public.

The configuration classification of the proposed road links is 'not definitive'. One might expect a more detailed assessment of the routes at the stage. It is not stated what additional work will be required to firm up this data.

##### 6.7.8

The list of receptors does not include any road within Balsham (e.g. Fox Road or Balsham High Street). Does this mean that they are absolutely excluded from construction access traffic? This would suggest a need for new access roads between Balsham Road and areas A and B. There is no mention of this, and at least one scenario (access via Balsham or new access road) would appear to be necessary, unless area B will be accessed via Six Mile Bottom Road. This needs clarification.

#### 6.7.10 Opportunities for enhancing the environment

This refers back to 6.2.10, which states that a plan will be produced. This seems like a wholly inadequate provision.

#### 6.7.12

No data is given on expected traffic flows, 'but will be confirmed prior to assessment'. At what point does this confirmation take place and when will it be published? (see comment on 6.7.2).

While area A may be accessed via Worsted Lodge, area B has no direct touch points with the A11. Area B could potentially be accessed via Six Mile Bottom Road/London Road. However, Balsham/Cambridge Road is a named receptor, as is the B1052 (6.7.8). These are probably most suited to HGV traffic. It is not explicit that Balsham High Street will become a main access route and should be a named receptor.

West Wrattling access via Honey Hill is currently possible only via Balsham. This route may also be subject to new traffic flows for the anaerobic digester at Streetly End by the time construction starts. This will have huge impacts on Balsham residents, especially those living on the main road.

In addition, area B is some distance from Balsham Road, but there is no mention of any new access roads to area B to avoid high levels of traffic passing through the village. The impact of these potential new roads on farmland outside of the scoped area B should be assessed. It may be that construction access to area B could be entirely via Six Mile Bottom Road/London Road, with new construction roads built through the construction site (possibly using the windfarm access roads) right through to exit onto Honey Hill on the B1052. This could potentially bypass Balsham altogether but would have a highly visible new road across the south facing hillside of area B, with heavy traffic volumes during construction. If this is to be the plan, then it raises the question why Balsham Road is named as a receptor, if it not to carry traffic through Balsham village.

Balsham Road/Cambridge Road – Balsham High Street has some properties with no off-road parking resulting in parked vehicles on highway restricting road width to single lane.

6.7.8 Receptors/matters to be scoped into further assessment – does not list Fox Road/Hildersham Road indicated in Figure 2.2 as potential connection route between sites A & B - see above. Also does not specify Balsham High Street separately.

The above places extreme pressure on the village of Balsham as it may service construction traffic to areas B and C.



### Figure 2.2 Potential construction site access routes and points

It appears that they may be proposing to use Hildersham Road and Fox Road as routes between Area A and Area B. The sight lines from both junctions are limited, particularly from Fox Road. Fox Road is not suitable for heavy vehicles and parts of it are designate footpaths – e.g Harcamlow Way and Icknield Way.

It looks like they are planning to monitor use of the footpaths this year to see if it can be listed in a lower category for assessment on the basis of usage.

In addition, if Fox Road in Balsham is under consideration for any construction access then this should also be a named receptor.

### **Biodiversity, habitats and wildlife**

Section 6.1 of the scoping EIA report addresses the impact of the scheme on biodiversity and wildlife. While surveys have been completed for areas A and B, they have not yet been conducted for area C or the connection corridors. Area C has a distinctly different landscape character compared to areas A and B, being wooded clay land rather than chalk hills. As a result, the ecology and habitats are likely to differ significantly and need separate consideration.

Although Fleam Dyke (SSSI and Scheduled Monument) is not designated as a Special Area of Conservation (SAC), we believe a Habitats Regulations Assessment (HRA) should be carried out due to its proximity to areas A and B and the presence of rare species-rich chalk scrub and grassland habitat, which is uncommon in south, central, and eastern England (page 95).

In 6.1.10 (summary of scoping), several receptors have been scoped out of the development areas and grid connection corridors.

**Action required:** Given their ecological importance and potential for biodiversity enhancement, habitats such as calcareous grassland, priority habitats like hedgerows, rivers, streams, grazing marsh, as well as arable fields and ditches, should not be excluded. These habitats support rare species, serve as wildlife corridors, and contribute significantly to overall biodiversity.

### **The assumption that all farmland has low biodiversity value is overly simplistic**

We would like to note that barn owls are known to nest and hunt in area B (particularly at [///mouse.snuck.humidity](#)), in addition to area A, as mentioned on page 151 of the scoping EIA. Furthermore, area B is home to a significant population of brown hares, which are listed in the UK Biodiversity Action Plan (BAP) due to their long-term decline. However, brown hares are grouped with other small mammals like hedgehogs, harvest mice, and polecats, and are scoped out as a biodiversity receptor for areas A, B, and C. This is not acceptable, as brown hares warrant specific consideration due to their conservation status.

**Action required:** Inclusion of brown hares as a scoped in biodiversity receptor.

In addition, **bats** are to be scoped in as important references show an apparent adverse effect of solar panels on bats. The reasons are not entirely clear, but one (quite plausible) proposal is that the surfaces are sufficiently similar to water for the bats to try drinking from them. However, evidence comes from studies on much, much smaller developments than this proposal, and the effects could therefore be much more significant. See attached document "Comments on EIA Scoping Report - Bats". One reason why I am pushing this with Balsham is that the caves by the sewage works are an important winter roost. I got this comment from the Cambridge Bat Group: *"One very important site is the Balsham caves, which are visited and surveyed each winter by the bat group, with records as you can see going back many years. These bats (mostly Natterer's, Daubenton's and Brown Long-eared) will forage over a wide area around here. Other important records include Barbastelle, which is a rare bat, which likely has several roost sites in this area as indicated by the records."*

Finally, we believe that most research on the effects of solar farms on biodiversity and wildlife has focused on much smaller-scale projects. There is inherent uncertainty in applying these findings to a development of this size.

**Action required:** We ask that any biodiversity net gains be supported by robust evidence and not extrapolated from research based on small-scale solar farms.

### **Other concerns**

A specific concern is the proposed construction schedule of 07:00 to 19:00 Monday to Friday, and 07:00 to 13:00 on Saturdays, with construction staff arriving before 07:00 and leaving after 19:00 on weekdays. We consider this schedule unacceptable, as it could cause significant disruption to residential amenity.

**Action required:** To protect residents, we recommend limiting construction hours to 08:00-18:00 Monday to Friday, 08:00-13:00 on Saturdays, with no work on Sundays, public holidays, or bank holidays.

Section 6.8.9 suggests that private properties and housing be scoped out of further assessment, citing the claim that "no significant effects are expected in relation to private property and housing." We challenge this assertion, based on studies showing the impact of other solar farms on property prices and the experiences of those currently trying to sell their homes.

**Action required:** This socio-economic impact should be included in the EIA, with the applicant required to explain how they plan to mitigate such effects.

The Parish Council believe that in tis current form, the Scoping Report is inadequate and does not contain the information required to produce an Environmental Statement or an Environmental Impact Anaysis. The issues raised above should be included in the Scoping Analysis report.

Yours sincerely

Gordon Fiddy  
Chair of Balsham PC

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## Summary Action List:

### **BESS Safety:**

*Action required:* 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.

### **Hydrology:**

*Action required:* Full assessment of ground-mounted solar PV on chalk aquifer to be scoped in.

### **Landscape and Visual Amenity**

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***Attachments:***

Hydrology Advice

Notes of Streetly Hall Anaerobic Digester

Impacted views for Balsham