

# KINGSWAY SOLAR FARM

EN010165

## Statutory Consultation

Suffolk County Council

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## Glossary of Acronyms

<i>AIL</i>	<i>Abnormal Indivisible Load</i>
<i>BESS</i>	<i>Battery Energy Storage System</i>
<i>CITB</i>	<i>Construction Industry Training Board</i>
<i>CLMA</i>	<i>Construction Labour Market Area</i>
<i>DCO</i>	<i>Development Consent Order</i>
<i>ES</i>	<i>Environmental Statement</i>
<i>ESDAL</i>	<i>Electronic Service Delivery for Abnormal Loads</i>
<i>ESSCP</i>	<i>Employment, Skills, and Supply Chain Plan</i>
<i>FTE</i>	<i>Full-Time Equivalent</i>
<i>HGV</i>	<i>Heavy Goods Vehicle</i>
<i>NSIP</i>	<i>Nationally Significant Infrastructure Project</i>
<i>NTS</i>	<i>Non-Technical Summary</i>
<i>PEIR</i>	<i>Preliminary Environment Information Report</i>
<i>PPA</i>	<i>Planning Performance Agreement</i>
<i>PV</i>	<i>Photovoltaic</i>
<i>RSA</i>	<i>Road Safety Audit</i>
<i>ZTV</i>	<i>Zone of Theoretical Visibility</i>

*“The Council” / “SCC” refers to Suffolk County Council; and “WSC” refers to West Suffolk Council.*

## **Purpose of this Document**

The document has been prepared by Suffolk County Council to respond to the Statutory Consultation for Kingsway Solar Farm occurring between 17 September and 29 October 2025.

# 1 Introduction

- 1.1 The proposed development is to build a Solar photovoltaic (“PV”) Farm with Battery Energy Storage Systems (“BESS”) and associated development including inter-array connections (underground cable or overhead line) and grid connection (15km 400kV overhead line, proposing to cross a linear scheduled monument, the Devil’s Dyke and another powerline, for which undergrounding may be required).
- 1.2 A map of the consented and proposed NSIPs in Suffolk is provided in Appendix A.
- 1.3 This response contains the comments of the Council, as a consultee under section 42 of the Planning Act 2008, in regard to this Statutory Consultation. The response includes an introductory section, including SCC’s Energy and Climate Adaptive Infrastructure Policy, followed by comments based on perceived impacts by service area following a review of the Preliminary Environmental Information Report (“PEIR”), the PEIR Non-Technical Summary (“NTS”), plans and maps explaining the nature and location of Kingsway Solar Farm, and additional documents included in the statutory consultation.
- 1.4 The SCC electoral divisions affected are as follows:
  - i. Exning and Newmarket
  - ii. Newmarket and Red Lodge

## 2 Policy Context

### SCC Energy and Climate Adaptive Infrastructure Policy

- 2.1 At its Cabinet meeting on 16 May 2023, Suffolk County Council updated its adopted Energy Infrastructure Policy, indicating its overall stance on projects required to deliver the UK's Net Zero ambitions. The policy states:
- 2.2 *“Suffolk County Council has declared a Climate Emergency and is therefore predisposed to supporting projects that are necessary to deliver Net-Zero Carbon for the UK. However, projects will not be supported unless the harms of the project alone, as well as cumulatively and in combination with other projects, are adequately recognised, assessed, appropriately mitigated, and, if necessary, compensated for.”<sup>1</sup>*
- 2.3 SCC will follow this approach in this response, and throughout the subsequent Development Consent Order (“DCO”) process.
- 2.4 The Council considers it essential that effective Planning Performance Agreements (“PPA”) are agreed with the Promoter. Its Energy and Climate Adaptive Infrastructure Policy states:
- 2.5 *“The Council will expect developers to engage in effective pre-application discussion with the Council. The Council expects that the costs of its engagement throughout the consenting process will be covered under the terms of a Planning Performance Agreement. This will be on a full cost recovery basis, to ensure that local services, and local taxpayers, are not disadvantaged financially by the Council’s engagement with project promoters.”*
- 2.6 Further details on SCC’s position in relation to PPAs can be found in its published guidance for project promoters.<sup>2</sup>
- 2.7 SCC continues to be willing to work with the Promoter through the issues, towards improvement of the proposals and required mitigations, and looks forward to further engagement over the coming months.
- 2.8 SCC has also published a Supplementary Guidance Document<sup>3</sup> for its Energy and Climate Adaptive Infrastructure Policy which gives specific guidance for developers of solar farms, following SCC’s experience with such NSIPs, which the promoter is encouraged to consult. The document contains guidance on the roles of the developer and authorities, how they should interact and how SCC expects solar-specific issues to be handled by the promoter.

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<sup>1</sup> [https://committeeminutes.suffolk.gov.uk/DocSetPage.aspx?MeetingTitle=\(16-05-2023\),%20The%20Cabinet](https://committeeminutes.suffolk.gov.uk/DocSetPage.aspx?MeetingTitle=(16-05-2023),%20The%20Cabinet)

<sup>2</sup> <https://www.suffolk.gov.uk/asset-library/planning-performance-agreements-for-nationally-significant-infrastructure-projects.pdf>

<sup>3</sup> <https://www.suffolk.gov.uk/asset-library/scc-policy-large-scale-solar-booklet.pdf>

### 3 Planning Authority

- 3.1 As a neighbouring authority, SCC (Planning) defers to Cambridgeshire County Council as the responsible authority in regard to matters relating to minerals and waste.
- 3.2 SCC notes that the promoter has omitted references to relevant Suffolk local planning policies in the PEIR.
- 3.3 The proposed development will result in impacts in Suffolk, particularly regarding impacts on Suffolk residents and businesses from cumulative effects, economy skills and employment, highways, and landscape perspectives.
- 3.4 SCC considers that there are several relevant local policies and guidance documents omitted, these include:
- i. Suffolk County Council's Climate and Adaptive Infrastructure Policy 2023 (and any successor document)<sup>4</sup>
  - ii. Suffolk County Council's Supplementary Guidance for Large Scale Solar Schemes<sup>5</sup>
  - iii. Suffolk County Council's Supplementary Guidance for Socio-economic Effects<sup>6</sup>
  - iv. Suffolk County Council's Supplementary Guidance for Traffic and Transport<sup>7</sup>
  - v. Suffolk Green Access Strategy, Rights of Way Improvement Plan 2020 – 2030 (and any successor document)<sup>8</sup>
- 3.5 Further, given the proximity to West Suffolk Council's administrative area, SCC considers that there are several relevant policies in the West Suffolk Local Plan.<sup>9</sup>
- i. Policy SP22 Strategic employment
  - ii. Policy SP26 Horse racing industry development
  - iii. Policy SP27 Development affecting the horse racing industry
  - iv. Policy SP29 Safeguarding horse walks and crossings
  - v. Policy SP31 Infrastructure
  - vi. Policy LP42 Rights of Way

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<sup>4</sup> <https://www.suffolk.gov.uk/asset-library/energy-and-climate-adaptive-infrastructure-policy.pdf>

<sup>5</sup> <https://www.suffolk.gov.uk/asset-library/scc-policy-large-scale-solar-booklet.pdf>

<sup>6</sup> <https://www.suffolk.gov.uk/asset-library/nsip-socioeconomic-effectnsips.v6.pdf>

<sup>7</sup> <https://www.suffolk.gov.uk/asset-library/TransportTraffic-InfraPolicy.v4.2.pdf>

<sup>8</sup> <https://www.suffolk.gov.uk/asset-library/imported/suffolk-green-access-strategy-2020-2030.pdf>

<sup>9</sup> [https://www.westsuffolk.gov.uk/planning/Planning\\_Policies/local\\_plans/upload/West-Suffolk-Local-Plan-2024-2041-July-2025.pdf](https://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/upload/West-Suffolk-Local-Plan-2024-2041-July-2025.pdf)

## 4 Summary

- 4.1 SCC considers that the proposed development may result in adverse impacts on the Horse Racing Industry in Newmarket, a valuable asset to the Suffolk economy and recognised as the international home of horse racing. This, therefore, is considered to be an important consideration when assessing impacts near Newmarket. Additional viewpoints are required to clearly visualise the landscape and visual effects of the scheme.
- 4.2 SCC welcomes that the cumulative assessment for Traffic and Transport will be undertaken in consultation with Suffolk County Council, and other key stakeholders. The Council expects the promoter to carry out a similar exercise of meaningful engagement to shape other detailed cumulative assessments. SCC will expect cumulative impacts to be adequately recognised, assessed and appropriately mitigated and compensated for, as per SCC's Climate Adaptive Infrastructure Policy. SCC would note that there are a series of nearby schemes to be constructed over the next decade, both consented and proposed, that must be considered, including the nearby Sunnica Energy Farm NSIP.
- 4.3 SCC holds concerns regarding the proposed grid connection corridor. The proposed approach of a 400kV overhead line will result in significant adverse impacts on the Newmarket Racecourses and is considered to be unusual and disproportionate. SCC expects alternative options to be considered (including an underground cabling system), and further assessment of the potential constraints involved in pursuing the proposed option.

## Impacts by Service Area

### 5 Cumulative Effects

- 5.1 Sunnica Energy Farm, situated in West Suffolk and East Cambridgeshire, has a connection offer at Burwell Main 400kV Substation. The Kingsway Solar Farm Order Limits immediately surrounding the Burwell Substation overlap with the Sunnica Energy Farm Order Limits. The detailed inter-project cumulative effects assessments to be included in the Environmental Statement must adequately detail the in-combination effects of the project and Sunnica Energy Farm. SCC expects the project promoter to apply the mitigation hierarchy to avoid, mitigate or compensate for significant adverse effects as they relate to Suffolk. The promoter should engage and coordinate with the promoter of Sunnica Energy Farm to minimise adverse impacts.
- 5.2 The use of an 400kV overhead line to connect the proposed development to the Burwell Substation (point of connection) will result in significant adverse impacts on the Newmarket Racecourses – a valuable asset to the Suffolk economy - and the designated site at Devil's Dyke which also serves as a valuable asset in landscape and recreational terms.
- 5.3 SCC considers that the use of an overhead line for the point of connection is unusual for solar schemes and will result in disproportionate impacts considering the local significance of the surrounding landscapes that would be affected. If the preferred solution of an 400kV overhead line for the grid connection corridor, plus the numerous small- and large-scale solar schemes near this sensitive landscape, will result in a significantly altered local environment. Much of the landscape is undulating and open, and as such screening proposals will still alter the landscape.
- 5.4 Therefore, SCC considers that alternative options (including underground cabling system) should be considered and that further consideration should be given to constraints and the mitigation hierarchy if an overhead line remains the preferred solution. The nearby, consented, Sunnica Energy Farm will construct an underground cabling system from the proposed development to the point of connection, including the inter-array connection corridors. As such, consideration should be given to this approach considering the sensitivity of the local landscape.
- 5.5 SCC welcomes the promoter's commitment to carry out the cumulative effects assessment for Traffic and Transport in consultation with SCC. SCC expects the promoter carry out a similar exercise of meaningful engagement to shape other detailed cumulative effects assessments where Suffolk is affected.



## 6 Economy, Skills and Tourism

- 6.1 PIER Vol 2, Chapter 14 defines a Construction Labour Market Area (“CLMA”) of 80 km, with a CLMA Focus Area of 16 km. However, paragraph 14.2.13–14.2.15 cites Construction Industry Training Board (“CITB”) data showing average travel-to-work distances of 20 miles, with 40% of workers travelling 10–49 miles and some workers can travel up to 90 minutes daily on a regular basis. SCC expects a robust CLMA definition considering the evidence given, instead of being constrained by administrative boundaries. The CLMA Focus Area should be expanded beyond 16 km to reflect the evidence base.
- 6.2 The CLMA and CLMA Focus Area both include areas within Suffolk, meaning there will undoubtedly be impacts on the local labour market. Despite this, there is an absence of reference to Suffolk County Council local planning policies such as Suffolk County Council’s Energy Infrastructure and Climate Adaptive Infrastructure Policy, as well as the supplementary guidance on skills, workforce and supply chain. There are also essential data sources missing, such as the Technical Legacy Report.
- 6.3 SCC policy requires separate economic study areas for workforce and supply chain. The PIER does not currently distinguish between these, nor does it differentiate between skilled and unskilled labour geographies. Workforce geographies should be defined by skill type and project phase (civils, M&E, commissioning), in line with SCC guidance.
- 6.4 Table 14.5 (Assessment Criteria – Receptor Sensitivity) does not include descriptors for skills/employment. SCC expects clarity via specific descriptors for the classification of the CLMA as “low sensitivity” and the CLMA Focus Area as “medium sensitivity” (14.5.6).
- 6.5 Chapter 14 of the PIER estimates 900 peak Full-Time Equivalent (“FTE”) construction jobs (14.5.2), with net additional employment of 560–640 FTEs in the CLMA and 310 FTEs in the Focus Area (14.5.3). Despite this scale, the assessment concludes only “minor magnitude of change” and “slight beneficial (not significant)” effects. SCC considers this conclusion to understate the potential impacts and benefits of the project on the local labour market.
- 6.6 SCC policy requires scenario-based assessment (low, medium, high) of home-based employment opportunities. The PIER does not currently provide this, nor does it assess the probability of local recruitment by skill type. The applicant should:
- i. Define workforce phases and associated skills/durations.
  - ii. Apply SCC’s low/medium/high probability framework to estimate home-based employment opportunities.

- 6.7 Table 14.4 (Population Receptors, Effects and Study Areas) does not explicitly include Suffolk local authorities (e.g. West Suffolk), despite Suffolk being within the CLMA.
- 6.8 Paragraph 14.2.50 assumes zero displacement, on the basis that construction workers are highly mobile. SCC disagrees due to multiple NSIPs in the region, meaning there is a clear risk of displacement and labour market competition, already being felt in the area. The applicant should reassess displacement risk, particularly in relation to overlapping NSIPs, and adopt a more cautious additionality assumption.
- 6.9 Paragraph 14.7.8 lists selected NSIPs for cumulative assessment. However, the list does not appear to include the full range of projects, taking into account that projects may draw a workforce from a 50-mile radius / 90-minute commute. Significant schemes such as Norwich to Tilbury and Sizewell C are all scheduled to coincide with the construction period and fall within overlapping labour market catchments. These projects must be included to ensure a robust cumulative assessment of workforce and supply chain impacts.
- 6.10 Chapter 17, Table 17.2 (Cumulative Effects Matrix) does not include employment and labour market as receptors. This is a significant omission, and SCC would recommend that the employment and labour market are added as explicit receptors in the cumulative effects matrix.
- 6.11 Paragraphs 14.3.24–14.3.25 uses 2023 BRES data for energy sector employment. This does not take into account the level of employment to be generated by the many NSIPs in the region and therefore would not be an accurate data source to determine impacts on the local labour market. Suffolk is also not included in the baseline or future baseline assessment, despite being within the CLMA.
- 6.12 SCC welcomes the proposal for an Outline Employment, Skills and Supply Chain Plan (“ESSCP”) (14.2.54; 14.4.4–14.4.6). However, Suffolk must be formally consulted on its development and expects the applicant to engage with the Regional Skills Coordination Function to enable a strategic approach to workforce development in the region, maximising local benefits, minimising negative impacts and ensuring efficiencies. The ESSCP should be included within the DCO requirements, with Suffolk County Council named as a consultee.
- 6.13 The ESSCP should detail a strategic approach to developing and supporting the project’s workforce requirements, taking into account each distinct phase of the project, feedback from employment monitoring measures and be reflective of Suffolk’s economics, in particular local opportunity that meets skills legacy for the region.
- 6.14 The applicant should also:

- i. Set an ambition for 5% of the roles required by the project to be filled through ‘earn and learn’ positions (the majority of which will be apprenticeships but may also include graduates on formalised training schemes and sponsored students as per the definition of the ‘5% club’) including a commitment to a minimum number of apprenticeship opportunities to be provided to local people.
- ii. Deliver and fund, in collaboration with the Councils and local partners, activities that develop both local talent pools and local people so that they are enabled to take up opportunities of recruitment into skilled roles across the project;
- iii. Work collaboratively with the Councils to ensure that where possible skills training, aimed at creating wider and deeper local talent pools from which to draw from, also has a long-term demand within the region thus ensuring a greater opportunity for sustainable employment;
- iv. Create tangible mechanisms for ensuring that the skills base developed for the construction of the project is as transferable as possible to other key construction projects being delivered regionally;
- v. Deliver activities with the aim to increase the size and diversity of the labour market pool;
- vi. Put into place clear plans (e.g., commitments within contracts) to drive the behaviours of their associated supply chain(s) to achieve skills and employment outcomes;
- vii. Incorporate social value measures within all activity and use as a tool to quantify the success of any and all interventions and to drive commitment and delivery of the associated supply chain to recruit locally and provide apprenticeship opportunities where feasible;
- viii. Adopt and fund a dynamic approach to monitoring skills, employment and education outcomes and impacts that, through clearly identified governance, processes the use of all available evidence, local expertise and labour market information to ensure home based worker targets are being met and programmes are in place to support/ensure local talent pools are available to combat any negative churn effects.

## 7 Highways

- 7.1 The following comments are based on the traffic and transport information available to date.
- 7.2 SCC, as the Local Highway Authority with regards to highways within Suffolk, is the lead authority on Traffic and Transport matters.
- 7.3 The Council expect developers to provide programmes and estimates of construction vehicles for study by stakeholders to allow informed comments regarding the scoping of documents such as the Transport Assessment, Environmental Impact Assessment and Travel Plan.
- 7.4 For the applicant to be mindful that Newmarket is an important part of the horse racing industry and to be taking this into consideration when assessing impacts.

### **Abnormal Load Movements**

- 7.5 The Council expects the promoter to proactively undertake robust investigations into proposed abnormal indivisible load (“AIL”) routes in order to identify any weight restrictions and, where necessary, identify appropriate measures to resolve these issues.
- 7.6 Whilst accepting there is a notification process – Electronic Service Delivery for Abnormal Loads (“ESDAL”) – this is a reactive, case-by-case method which does not proactively assess AIL routes. The Council would expect the Applicant to undertake sufficiently robust investigations to identify any restrictions on routes proposed for AILs and, where necessary, appropriate measures to resolve these issues.

### **Cumulative Impact**

- 7.7 SCC welcomes that the cumulative impact assessment will be undertaken in consultation with Suffolk County Council.
- 7.8 There are a significant number of NSIPs that are likely to be constructed in East Anglia and Suffolk in the next decade. Besides NSIPs, there are a number of large residential sites and smaller scale energy projects being delivered at the same time. To fully understand the impacts, the cumulative impact of all such projects will need to be assessed. SCC is also concerned about the impact that sequential delivery of these projects would cause, for example the duration of the disruption to the highway network including Public Rights of Way.

### **Protection of Highway Rights and recovery of Costs**

- 7.9 As a Local Highway Authority, SCC would expect that its role is protected either through protective provisions or an agreement with the applicant secured before the end of the examination. The authority would also seek to recover any

reasonable costs it incurs undertaking its duties, including but not exclusively those for checking and approving works within the public highway, additional maintenance resulting from construction traffic and monitoring management plans.

7.10 SCC has published a Traffic and Transport Supplementary Guidance Document to its Energy and Climate Adaptive Infrastructure Policy, which outlines SCC's expectations for pre-application engagement between the promoter and the Local Highway Authority.

7.11 SCC would expect the applicant to use our guidance links:

- i. <https://www.suffolk.gov.uk/asset-library/TransportTraffic-InfraPolicy.v4.2.pdf>
- ii. <https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/development-design-and-specification>

7.12 For Highway boundary information please refer to:

- i. <https://www.suffolk.gov.uk/roads-and-transport/highway-maintenance/road-adoption/highways-and-private-roads>

7.13 For the official street names please use:

- i. <https://www.findmystreet.co.uk/>

7.14 Below are specific comments to the proposal

7.15 For any accesses and routes within Suffolk linked with the below, please note:  
*This informal advice is based on the information readily available and does not bind Suffolk County Council as Local Highways Authority on its response to any future planning applications.*

- i. Pre- commencement works
- ii. Archaeology and other surveys
- iii. accesses and access routes
- iv. Construction
- v. Accesses for construction and maintenance
- vi. Types/locations
- vii. Vegetation removal
- viii. Road Safety Audit ("RSA")
- ix. Haul Roads to access points and crossovers
- x. Construction traffic

- xi. Volumes of Heavy Goods Vehicles (“HGV”)
- xii. Numbers of construction workers and workers transportation
- xiii. Construction workers Travel Plan
- xiv. AILs
- xv. Temporary diversion routes/Temporary traffic management

## 8 Landscape

### Landscape and Visual Assessment Methodology

#### Study Area and ZTV

- 8.1 The Zone of Theoretical Visibility (“ZTV”) figures should show the full extent of the ZTV, which appears to go well beyond the 3km of the proposed study area. The ZTV should be used to inform the study area; the study area should not curtail the visualisation of the ZTV. From these figures it appears that the 3km study area is insufficient.
- 8.2 *Figure 7.11: Screened ZTV, Grid Connection Corridor* demonstrates that the proposed Grid connection corridor of a 400kV powerline would be the most visible element of the scheme, particular towards Suffolk in the east.
- 8.3 Observer height will need to take equestrians into consideration with regards to visibility as well as glint and glare. Observer height of 1.6m only is insufficient (also relevant for visual assessment).

#### Baseline Characterisation Approach

- 8.4 In addition to datasets listed, SCC considers that the following datasets should be included:
  - i. The Suffolk Landscape Character Assessment  
<https://suffolklandscape.org.uk/>
  - ii. Local Nature Recovery Strategies, if published (Suffolks LNRS is now published)
  - iii. The revised Ancient Woodland Inventory, now published for Suffolk,  
<https://naturalengland-defra.opendata.arcgis.com/datasets/Defra::ancient-woodland-revised-england-completed-counties-1/explore?location=52.153911%2C1.358284%2C11.46>
  - iv. Neighbourhood Plan policies of parishes that are potentially affected by the scheme (for example, policies regarding key views), in particular the Newmarket Neighbourhood Plan
  - v. Other published Landscape Character Assessments and Valued Landscape Assessments

#### Scope of Assessment in relation to Landscape and Visual Amenity

- 8.5 Table 7.1 should consider intra- and inter-cumulative effects for each phase (Construction – Operation – Decommissioning). It should also consider night-time effects, such as light pollution.

**Terminology**

- 8.6 Paragraph 7.2.33 Adverse effects should also include potential *indirect* effects.

**Sensitivity of Landscape Receptors**

- 8.7 SCC has reservation with Table 7.2, in particular with the classifications of landscape susceptibility, which do not appear to reflect the definition at the header bar.

**Magnitude of Effect, Landscape Receptors**

- 8.8 Table 7.3: SCC disagrees with the classifications for extent and considers that the geographical area covered by the proposal also needs to be considered. With the current wording the large-scale proposal could be considered to have only localised effects, while in fact affecting a large geographical area

**Landscape Significance of Effect / Assessment Criteria**

- 8.9 Table 7.4: SCC considers that all effects of a moderate significance or above should be considered significant, and those of moderate/minor should be more closely examined as to whether they are significant or not. It should also be noted that SCC considers that an accumulation of effects below the significance threshold can become significant in their accumulation.

**Sensitivity of Visual Receptors**

- 8.10 Table 7.6: SCC does not fully agree with the classifications in this table. For example, unless this is dealt with elsewhere, the visual receptor group of residents in their properties and with direct or oblique views of the development appears to be missing from the assessment. It is also not just about how extensive the views are, but also, if there are sequential views of the development along certain routes.

**Significance of Visual Effects / Assessment Criteria**

- 8.11 Table 7.8: SCC considers that all effects of a moderate significance or above should be considered significant, and those of moderate/minor should be more closely examined as to whether they are significant or not. It should also be noted that SCC considers that an accumulation of effects below the significance threshold can become significant in their accumulation.

**Cumulative Effects**

- 8.12 SCC considers that cumulative effects also include intra-cumulative effects of elements of the overall development, inter-cumulative effects with other developments (not just solar) that are consented but not yet built, and sequential effects of both these effect groups on visual receptors moving through the landscape.



***Future Baseline***

- 8.13 Paragraph 7.3.50 SCC queries on what basis it is assumed that other potential changes to the character of the local landscape would be localised and of no significance to this assessment.

***Viewpoint Locations***

- 8.14 While, to the west, some of the viewpoints are at 3km from the scheme, in the east, this is not the case, in an area for which the ZTVs suggest far greater visibility than 3km. SCC considers that additional viewpoints are required to clearly visualise the landscape and visual effects of the scheme to the west of Newmarket, which is an area of national importance for horse racing (and recognised as the international home of horse racing).<sup>10</sup> The landscape is undulating, resulting in far reaching views. SCC expects that visual effects on Suffolk will be fully addressed in the ES, if required with viewpoints at or beyond 3km from the scheme. SCC and WSC should be included in further consultation with regards to additional viewpoints (omitted in Paragraphs 7.2.10 and 7.9.2 of the PEIR).

***Preliminary Assessment of Likely Significant Environmental Effects***

- 8.15 SCC will comment in detail on the assessment of landscape and visual effects on areas in Suffolk, once the assessments are complete (and additional data sets and viewpoints have been included). Note in Volume 4 Appendix 7.3 Landscape Assessment Tables it should read 'West Suffolk Landscape Character Assessment', not 'West Sussex...'.

***Baseline Visualisations***

- 8.16 SCC would ask that the viewpoint numbers, titles and viewing directions are printed in a much bigger font size, so that they are easily legible, when viewed online.
- 8.17 Location maps that provide a clear spatial context (such as a large enough cropped OS-base) and that show the viewpoint and the viewing direction in this context should be included.

***Illustrative Landscape Masterplan (Figure 7.15)***

- 8.18 As the physical extent of the scheme is currently entirely within Cambridgeshire, SCC will only provide in principle recommendations. SCC considers that all external boundaries of the array parcels should be screened with substantial hedgerows, in addition to those shown on the plan.

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<sup>10</sup> [https://www.westsuffolk.gov.uk/planning/Planning\\_Policies/local\\_plans/upload/West-Suffolk-Local-Plan-2024-2041-July-2025.pdf](https://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/upload/West-Suffolk-Local-Plan-2024-2041-July-2025.pdf)

8.19 There is an opportunity to create additional permissive footpaths through the scheme and promote recreational connectivity. Existing rights of way should be provided with generous corridors through the arrays; any fencing should be screened with hedges.

8.20 With NSIPs of this scale and nature it will be essential to integrate the mitigation for landscape and visual amenity with the requirements for ecological enhancements, archaeological constraints a recreational added value.

#### ***Additional Mitigation, Monitoring and Enhancement Measures***

8.21 SCC expects that the full mitigation hierarchy is applied, including compensation. SCC would welcome, if the Applicant would clearly define the terminology for mitigation relating to landscape and visual terms (such as embedded in the design, mitigation planting to further reduce the impacts and effects on landscape and visual receptors, reinstatement planting as the basis for Biodiversity Net Gain, further landscape enhancements and compensation for residual effects).

#### ***Summary of Preliminary Landscape and Visual Residual Effects***

8.22 Tables 7.14 and 7.15: It would be useful if there was more information included, as to which elements of the development cause which residual effects.

#### ***Vegetation Loss***

8.23 This is not a topic that directly affects Suffolk for this project. However, there is concern that the impacts on vegetation and habitats are underplayed (paragraphs 6.6.10ff in PEIR Chapter 6 Biodiversity), particularly with regards to the grid connection via a 400kV powerline. The caveat ‘where reasonably practicable’ does not instil confidence.

8.24 SCC considers that the proposals require a full and detailed Arboricultural Impact Assessment (including Tree Survey, Method Statement and Tree Protection Plan) in accordance with BS 5937:2012 (or its update) and detailed hedgerow surveys and schedules, identifying Important Hedgerow under the 1997 Hedgerow regulations.

8.25 Reinstatement, aftercare and long-term management will need to be anchored in the control documents, such as the Outline Landscape and Ecological Management Plan.

#### ***Presentation***

8.26 SCC welcomes the clear structure of the Landscape and Visual Amenity Chapter of the PEIR as well as the clear titles of all chapters, appendices and figures. The cross-referencing is clear and easy to follow. SCC would welcome, if this was carried through to the ES documents.

- 8.27 It would be helpful, if significance ratings in the assessments tables would be colour coded, for easier referencing.

# KINGSWAY SOLAR FARM

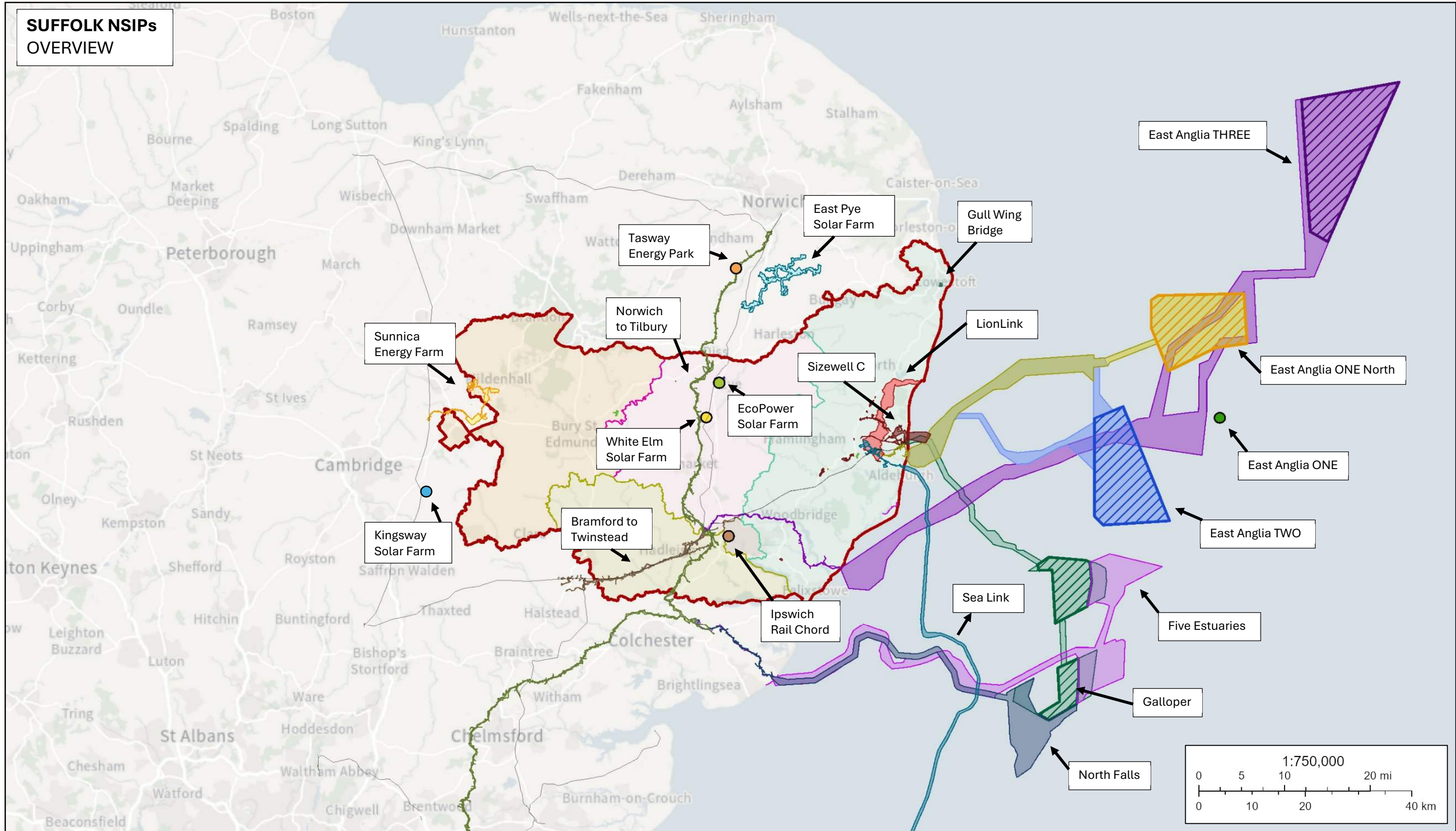
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## Appendix A (Suffolk NSIPs Overview)

Suffolk County Council



# SUFFOLK NSIPs OVERVIEW



**Suffolk**  
County Council

**Growth, Highways, & Infrastructure**  
Endeavour House  
8 Russell Road  
Ipswich  
Suffolk  
IP1 2BX

## SUFFOLK NSIPs

Nationally Significant Infrastructure Projects (NSIP)

October 2025

