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KSCA Response to Policy CC/RE: Renewable Energy Projects and Infrastructure

[Policy CC/RE](#) as part of the Draft Greater Cambridge Local Plan currently under consultation, provides a framework for supporting renewable energy generation in Greater Cambridge and recognises the role of renewable infrastructure in meeting climate change and net-zero objectives.

This policy is particularly relevant to KSCA's current interest in the Kingsway Solar proposal and the plan to develop a large-scale solar farm in South Cambridgeshire with a co-located battery energy storage system (BESS).

While Policy CC/RE sets out positive intentions, it lacks sufficient detail and safeguards to ensure that developments of this scale avoid unacceptable environmental, landscape and community impacts. From KSCA's perspective, although parts of the policy promote sustainable design and biodiversity protection, other areas remain unclear and fail to establish robust mechanisms to prevent adverse environmental, social or landscape effects. In practice, this creates a real risk that large-scale projects could proceed without fully addressing local concerns, ecological sensitivities or the cumulative impacts of major infrastructure on the community and environment.

Supportive aspects of the policy

Policy CC/RE appropriately supports renewable energy projects in principle, including associated infrastructure such as battery energy storage systems (BESS) and grid connections. This aligns with national and local climate objectives, including the target of achieving net zero by 2050.

The intention to identify broad areas of suitability for different renewable technologies is welcomed. If underpinned by robust landscape, ecological and technical evidence, this approach could provide greater certainty for communities and decision-makers, particularly in identifying locations where large-scale solar development may or may not be appropriate.

While the policy refers to support for community-led schemes, it does not exclude or distinguish against larger commercial projects.

Key assessment criteria and concerns

The policy sets out assessment criteria that are particularly relevant to large-scale solar developments and which require careful and consistent application:

Residential amenity and quality of life

Visual impact, noise and effects on wellbeing must be fully assessed and avoided or mitigated. For large-scale solar developments, strong expectations around layout, buffering, screening and separation from sensitive receptors are essential to prevent unacceptable impacts on nearby communities.

In relation to noise, users of public rights of way should be explicitly recognised as receptors. The significance of noise impacts should reflect the likely duration and proximity of exposure when close to infrastructure such as inverters, transformers and BESS. Such users should not be dismissed as “transient receptors” and therefore treated as insignificant within noise assessments.

Landscape character and appearance

Landscape capacity is a critical consideration. High-density layouts, limited spacing between arrays and impacts on public rights of way can fundamentally alter landscape character. The policy should ensure that landscape mitigation is not treated as secondary to maximising generating capacity and that sufficient space is retained for landscape integration and ecological enhancement.

Biodiversity and ecological impacts

The policy rightly requires protection and enhancement of biodiversity, including delivery of Biodiversity Net Gain (BNG). However, greater clarity is needed on how BNG commitments will be secured, monitored, managed and enforced over the lifetime of large-scale developments, to ensure that stated benefits are realistic, measurable and enduring.

The policy should also explicitly require the protection of existing species and habitats that may contribute little or nothing to BNG calculations. This should include species associated with open landscapes, such as ground-nesting and overwintering birds and brown hare, which are particularly vulnerable to disturbance and displacement. Where off-site mitigation is proposed, the policy should require robust justification and evidence demonstrating that such measures would not adversely affect species or habitats already present at the off-site locations.

Heritage and archaeology

Consideration of heritage assets and archaeological remains is appropriate and should be proportionate to the scale and location of development.

Other infrastructure constraints

Impacts on aviation, telecommunications, highway safety and sensitive scientific infrastructure must be addressed. For large-scale solar projects with extensive grid infrastructure, these considerations are particularly relevant and should be clearly reflected in supporting guidance.

Cumulative impacts

Explicit reference to cumulative impacts is welcome. In areas where multiple energy or infrastructure projects are proposed, cumulative landscape, ecological and community

impacts must be assessed in a meaningful and transparent way. This is particularly important where several large-scale schemes may come forward within the same locality (e.g. Kingsway Solar and Sunnica).

Relationship to NSIPs

Policy CC/RE confirms local support for renewable energy but does not differentiate between small-scale, community-led schemes and large-scale developments. However, it is important to recognise that projects such as Kingsway Solar are NSIPs and are determined by the Secretary of State under the Planning Act 2008. While the Local Plan provides important local context and articulates community expectations, its direct weight in NSIP decision-making is limited compared with national policy and statutory assessments.

Strengthening Policy CC/RE to avoid unintended loopholes

While Policy CC/RE supports renewable energy in principle, greater precision is required to prevent developments being approved primarily on the basis of climate benefits, without adequately addressing local environmental and community impacts. To strengthen the policy and ensure balanced decision-making, the following clarifications are recommended:

- **Clear limits on “in principle” support:** The policy should explicitly state that support for renewable energy does not override the need to avoid significant adverse impacts on landscape character, residential amenity, biodiversity, heritage assets and public rights of way.
- **Avoidance before mitigation:** The policy should prioritise avoidance of harm through site selection, scale, layout and design, before reliance on mitigation, compensation or future habitat creation.
- **Robust delivery of BNG:** Biodiversity Net Gain must be demonstrably deliverable, measurable and secured for the lifetime of the development. Aspirational or unenforceable proposals should not be used to offset significant on-site ecological harm.
- **Ecological impacts:** Protection of existing species and habitats that may contribute little or nothing to BNG calculations must be required. Robust justification should be required for any off site compensation, along with evidence demonstrating that such measures would not adversely affect species or habitats already present at the off-site locations.
- **Preventing piecemeal approvals:** Cumulative impacts should be assessed against reasonably foreseeable developments, not only those already consented, to avoid incremental erosion of landscape and ecological value.
- **Transparency on layout and density:** The policy should discourage overly dense layouts designed primarily to maximise output at the expense of landscape integration, biodiversity function and community experience.
- **Clear evidential standards:** Compliance should be demonstrated through site-specific, robust and proportionate evidence, rather than high-level or generic assessments.

Suggested policy clarification

To avoid ambiguity, the policy could include wording such as:

“Support for renewable energy development will not be afforded where proposals result in significant harm to landscape character, biodiversity, residential amenity or heritage assets that cannot be demonstrably avoided and acceptably mitigated. The climate benefits of renewable energy generation must be balanced against, and not automatically outweigh, these considerations.”

Conclusion

Policy CC/RE provides a positive starting point for supporting renewable energy development in Greater Cambridge. For large-scale solar projects, its effectiveness will depend on:

- Clear and balanced application of landscape, amenity and biodiversity criteria
- Strong expectations for avoidance, mitigation, monitoring and long-term management
- Meaningful and transparent assessment of cumulative impacts

With these refinements, the policy can better support renewable energy delivery while safeguarding landscape character, biodiversity and community wellbeing.

For further information about KSCA, please go to: www.kingswayaction.org