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Ref: Sunnica Energy Farm – Statutory Consultation Response – December 2020

Worlington Parish Council objects to the proposal for the Sunnica Energy Farm.

A household survey of Worlington residents, held during October 2020 showed that 89% of respondents were against the proposed scheme as described in the current Statutory Consultation. We had responses from 89 residents of Worlington, with 80 against the proposal in its current proposed size, and 57 in favour of a smaller proposal. In comparison, out of the 89 respondents, 83 were overall in favour of renewable energy, so it is quite clear that our village is not against renewable energy, but are concerned about the size of the proposed Energy Farm.

Worlington Parish Council, after holding village meetings and surveys and listening to its resident's concerns, **Objects to the proposed development on the following grounds:**

- **Size and scale**
- **Visual appearance, trees and screening**
- **Effects on wildlife / environment**
- **Loss of productive farmland**
- **Risks of battery storage, fire risk and health effects**
- **Traffic and disruption during construction**
- **Lack of a proper decommissioning bond**
- **Inadequate consultation** - The government policy UK Solar PV Strategy Part 1: Roadmap to a Brighter Future, which lays out four Guiding Principles for the development of solar PV, with Guiding Principle number three as follows: "Support for solar PV should ensure proposals are appropriately sited, give proper weight to environmental considerations such as landscape and visual impact, heritage and local amenity, and provide opportunities for local communities to influence decisions that affect them."

Government guidance on Paragraph 170 of the National Planning Policy Framework replies to the question: "What are the particular planning considerations that relate to large scale ground-mounted solar photovoltaic farms?" with 9 points describing how to avoid a "negative impact on the rural environment, particularly in undulating landscapes". In our opinion the Sunnica proposal fails to address all aspects of Guiding Principle number three, and also the 9 points from the Guidance on Renewable and Low Carbon Energy.

Size and scale: The scheme would be the largest solar scheme and the largest battery storage scheme in the UK. At 500MW grid connection, it is significantly larger than the previously largest scheme at Cleve Hill (350MW). At 2,792 acres, it covers an enormous area currently used for farming, and is roughly the size of the nearby town of Newmarket. An analysis using publicly available data of solar schemes already planned or constructed within 15 miles of the site indicates over 2000 acres of land generating over 450MW either already built or approved. The largest of these schemes, North Angle Farm at 188 acres, demonstrates that capacity can be accommodated

without taking large contiguous areas of farmland out of use. The huge size of the scheme leads to its own significant issues with siting for the project overall. The search for unusually large parcels of land has led the scheme to base itself well away from the high capacity connection point to the National Grid at Burwell. Smaller schemes do not encounter this issue, connection to the local grid is possible, and much less substation equipment is required as the supply doesn't need to be "stepped up" to the very high voltages used on the National Grid. Losses increase given the approximately 15 miles of cable between East A and the substation at Burwell, and the additional equipment required.

Visual appearance, trees and screening:

The huge scale of the Sunnica West A and Sunnica East A and B proposals, mean that they are much difficult to integrate into the local landscape, and the Joint Response from SCC/CCC/WSC/ECDC highlights the inability of the visual mitigation proposed to achieve this integration, with impact on multiple villages including Worlington, Freckenham, West Row and Isleham. Increased size means increased infrastructure, and the substations and BESS compounds are huge, covering 78 acres in total. As the scheme seeks to connect directly to the National Grid at Burwell, 10-metre high substation equipment is required at the three BESS compounds. This would cause significant visual intrusion, and is very difficult to hide from view, being particularly alien to the farming and rural landscape. The Alternatives site analysis in the PEIR Chapter 4, is incomplete. It contains no information about other sites considered within the 15km radius of the National Grid at Burwell. Comments made during the Sunnica webinars about "energy trading", gives concerns that this scheme is not really about solar after all, if it relies so heavily on energy trading using the battery storage element then surely it might be better sited closer to a grid connection point. We believe that these issues mean that the proposal is not appropriately sited. It also goes against points 1, 2, and 9 of the planning considerations.

We consider that screening is ineffective and insufficient, no thought or has been given to the design and effectivity, using the cheapest possible planting regime at the expense of mitigation effect. The Joint Response from SCC/CCC/WSC/ECDC notes a lack of detail, and fundamental issues with design such as mitigation being inappropriate for the landscape type. Mitigation is monotonous, instead of including character trees in an attempt to produce a realistic skyline. Some site choices cannot ever be mitigated, such as the view north from the Limekilns on the edge of Newmarket. The Joint Response from SCC/CCC/WSC/ECDC questions setback distances, which seem to have moved up to 5 metres from the previous 20 metres setbacks in all cases. Parameter plans show some odd-shaped panelled areas, e.g. towards Worlington on the B1102. Some areas slope uphill away from dwellings in Freckenham, e.g. Lee Farm on Isleham Road, with no intermediate planting. We note that during webinars the timeline for construction included mitigation planting (hedges, trees and grassland) at the end of the two-year construction phase. This means two lost years of potential growth in screening versus planting at the beginning of construction, bearing in mind that most of the planting will take up to 10 years plus, to grow to a height that would substantially hide the development. We consider the reduction in set-back distances from 20 metres to 5 metres may have influenced this decision. We believe that the proposal scheme does not give appropriate weight to landscape and visual impact. We believe that the proposed scheme also contravenes Forest Heath LDF Core Strategy Development Plan Document 2001-2026 policies CS3 Landscape Character and the Historic Environment and CS5 Design Quality and Local Distinctiveness.

Effects on wildlife/environment:

The Ecology Chapter 8 of the PEIR Analysis and mitigation proposals raises significant questions about the preservation of the habitat for bird species including Stone Curlew, found within Sunnica East A and B. We support the statement in the Joint Response from SCC/CCC/WSC/ECDC which questions the approach to mitigation and requests further details. West Suffolk Council Policy DM10 notes mitigation must be in place in advance of construction, not just in advance of the breeding season. This contrasts with statements during webinars which indicated that mitigation works would begin at the end of the construction phase. We are also concerned about the reference to “securing” mitigation sites in Appendix 10i section 7.2.24, does this mean compulsory purchase of further land outside the red line boundary in an attempt to avoid the noise and disruption effects of the two-year construction period? The analysis of noise and vibration from the BESS compounds (e.g. air conditioning units) does not appear to take into account any ecological effects. We note that in the Scoping Opinion, the MOD raises points about the construction of the scheme attracting birds to the site and potential bird strike safeguarding concerns. We believe that the proposal scheme does not give appropriate weight to environmental impact. It also goes against point 1 of the planning considerations of the National Planning Policy Framework. We believe that the proposed scheme also contravenes Forest Heath District Council Core Strategy Development Plan Document 2001-2026 policy CS2 Natural Environment and West Suffolk Council Joint Development Management policy DM10 Impact of Development on Sites of Biodiversity and Geodiversity Importance.

The blanket closure of Public Rights of Way (PRoW) in the area for the two-year construction period, will have a significant negative effect on the recreation and well-being of residents. We do not agree that PRoW, which in many cases run along the edges of the development, or through areas that would be subject to development margins or set-backs, need to be closed for the full construction period, causing residents and visitors a significant loss of amenity. We believe that these issues mean that the proposal does not give proper weight to loss of amenity.

We would also like to see further clarification on the proposed use of irrigation water (for agricultural use) for cleaning purposes, as it is our understanding that this would not be licenced as it goes against its intended use.

Loss of productive farmland:

The loss of 2,792 acres of valuable farmland must be given much thought. Though unfairly categorised by Sunnica, there is significant indication that the data used for the land quality assessment is outdated and needs to be updated, the land has been in continuous use as farmland for generations. Carefully managed using rotations of cereals, root crops and livestock, the light soil is valued for its excellent drainage and lack of large stones. These characteristics allow the growth of high quality crops at above average yields, and minimise the time when the land cannot be worked due to the waterlogging more commonly found on more clay-based soils. The assumption that it would return to productive farmland having been “rested” ignores the fact that it will have been shaded by panels for the duration. Rain, shadows and changed ground temperatures under the huge areas of panels will have affected the Breckland soil, and subjected it to significant wind erosion. There is also the question of “current land use” classifying the land as brownfield/industrial and not agricultural. There is a noted lack of engineering-level technical detail in the proposal, for example with no detail on the generating capacity of the panels or BESS, or the storage capacity of the BESS, precluding calculations about the environmental impact of the scheme, or on its noise impact.

There are significant areas of buried archaeology in the immediate area. Though geophysical surveys have identified some intact buried remains such as those in E06, we remain concerned that the piling for panel supports (up to 3.5 metres into the ground) would damage other undisturbed finds in the panelled areas of the scheme. Local finds such as the Mildenhall Treasure and the Rumbelow Hoard demonstrate the high quality of the artefacts and archaeological record that could be damaged for short-term gain. We believe that these issues mean that the proposal is not appropriately sited and does not give proper weight to heritage assets. It also goes against points 1 and 7 of the planning considerations laid out in National Planning Policy Framework. Larger fields increase the level of construction traffic, access issues and associated soil compaction from delivery vehicles. We believe that these issues mean that the proposal is not appropriately sited. It also goes against point 1 of the planning considerations laid out in National Planning Policy Framework.

Risks of battery storage, Fire risks and Health Risks:

Residents are very concerned about the size and operation of the Lithium-ion Battery Energy Storage Systems (BESS) included in the scheme. Very limited information presented during the webinars implied these systems would, taken together, be the largest such installation in Europe and possibly worldwide. In spite of tens of pages of information about the solar panels, the only technical information about the BESS is provided on three pages in PEIR Chapter 3, Scheme Description. This cannot be considered sufficient detail to assess the impact of the BESS, especially as the storage capacity is not even provided. The Joint Response from SCC/CCC/WSC/ECDC notes that the modelling of electric fields is not included in the PEIR, and requests that it is reported. We believe that the local health authorities (Primary Care Trusts and Care Commissioning Groups) should also be involved in disaster planning and monitoring for any long-term health effects of the scheme, so that residents' health can be assured. If the scheme was designated a COMAH site, as noted above, this would happen automatically. This is made more important by the close proximity of the BESS compounds to residential areas, for example those on Bridge End Road, Elms Road, Isleham Road, and the proximity of the primary schools in Red Lodge. The BESS technology is stated to be lithium-ion. However, lithium-ion covers a broad range of battery chemistries. Given the differing characteristics of each, this is an insufficient description of the technology to allow proper assessment. Lithium-ion batteries of all chemistries are known to present safety concerns, with reports of a fires and the cumulative risk of having such large numbers of batteries in one place is alarming many residents who can find no references to any safety standards such as COMAH in the consultation documentation. As there appears to be no plan in place regarding procedures if there were a fire on site, there is naturally concern regarding health implications of neighbouring residents, in relation to smoke and hazardous gases.

Along with smoke/hazardous gas fumes in the case of a fire, there is also concern around the control of dust during construction e.g. West Suffolk Council, raise the issue of the need to control dust during any construction work. However, the PEIR Chapter 14 Air Quality assessment notes the risk as “low to medium” for amenity and human health receptors, and the effect on respiratory conditions does not appear to have been considered.

There is also concerns regarding sound pollution impacting on local residents, the note in the planning applications for the BESS installations at Burwell state that there have been regular complaints from local people about the noise levels from the Burwell substation, and that this is being actively monitored and investigated. Furthermore, noise mitigation for these much smaller BESS installations is required as part of the planning approval. Sound pressure level estimates for the

BESS compounds in Chapter 11 of the PEIR Appendix 11D do not appear to consider the cumulative effects of many BESS containers being installed in each location, and instead seem to rely on the operational noise level generated by a single container. Since the number of BESS containers at each site is not known, we do not see how overall sound pressure levels for each BESS compound could in any case be generated. Additionally, the cabinet plan in Appendix 11D section 11.4.2 appears to show the air conditioning units inside the cabinet, and does not show the compressor units on top of the cabinets as detailed in Chapter 3. The air conditioning units will create sound pollution. The use of flood lights will also impact on people locally, causing significant light pollution, which will also have an effect on local wildlife.

We do not consider the level of information provided in the consultation documentation is sufficient to provide any meaningful consultation on the BESS and associated infrastructure. We note the enquiry letter dated 18th November 2020 sent to Sunnica by Dr Edmund Fordham CEng noting the insufficiencies in the specifications provided, and setting out 18 questions to “complete the minimum information needed for a meaningful Consultation”. The questions cover capacity, fire risk and mitigation, technology, design codes, safety standards and the application of COMAH regulations to the site. In particular, we expect that the site should be registered under the COMAH regulations, in common with other local businesses handling or making use of hazardous materials.

Traffic and disruption during construction:

The response from Suffolk County Council notes that there has been no engagement with Suffolk Highways on construction traffic planning. The Joint Response from SCC/CCC/WSC/ECDC notes that the modelling in the Construction Environment Management Plan is flawed. We note that the modelling of staff vehicle numbers relies on significant car sharing (ratio 1.5) however no justification as to how this would be achieved is made, it simply appears to be a calculation to reduce the number of vehicles. In light of current COVID-19 restrictions, and no idea of when they will end, taking into account car sharing is not indicative of true figures at present. Locations away from the A11 such as East A are generally inaccessible for the volumes of HGV traffic forecast, with routes using C and U class roads to access site entrances. The Transport Plan shows HGV's using Elms Road for the main access point to East B on a section currently closed to HGV. Significant upgrades to the northbound Red Lodge junction from the A11, and Elms Road, would be required to allow HGV to access the BESS compound at E18 on Elms Road. Similar improvements would be required on other roads around East A. HGV routes are shown on the draft traffic management plan as bi-directional, with multiple vehicles per hour, hence there is a significant chance of HGV's meeting one another as they travel to and from Sunnica East A using the C and U class roads. The HGV routes include “Four-cross bridge” beside enclosure E10, which may well be unsuitable for the proposed level of HGV traffic. The proposed access route to be made just before the railway bridge on the West Row to Freckenham Road, is proposed virtually on a blind corner. The use of ‘Golf Links Road’ in the Transport Plan, is completely unsuitable for HGV traffic, and as a single track, it is completely unsuitable for heavy traffic volume. The Parish Council has raised the poor condition and unsuitability of the Golf Links Road with SCC Highways for the past 5 years, and the road is already struggling and severely damaged with the traffic volumes currently.

Lack of a proper decommissioning bond:

Webinars stated that a decommissioning bond would start to be funded from year 10 or 15, and only be fully funded in the later years of the scheme. However, if for some reason the farm required

decommissioning during its expected life of 40 years, for example because it had been superseded by later technology and was uneconomic, then the burden of decommissioning might not fall on the company but on the local authorities. Please confirm how the decommissioning bond would address the cost of decommissioning during the life of the scheme, since once constructed the need to decommission the farm is an absolute risk. This compares to a contingent risk such as a fire event, which may be insured against. The lack of a fully-funded bond also goes against point 3 of the planning considerations laid out in National Planning Policy Framework. We note that the Joint Response from SCC/WSC/ECDC/CCC makes a similar point.

Inadequate consultation: Concerns about the consultation, in particular that in being online-only, it excluded a significant proportion of residents in the area. Village life does not currently include “garden gate” conversations and other village events that people use to form views about complex issues like this scheme. Booklets and letters from the company have been delivered in plain white envelopes that did not include “Sunnica” on the outside, we suspect many were assumed to be unsolicited marketing materials and thrown away. Limited adverts for the scheme were taken in newspapers, in small print text. The consultation booklet was produced with small text, included confusing and out-of-scale maps, and did not include simple facts such as the size of the parcels of land or the generating capacity of the solar panels and battery storage. Relevant facts were buried deep in the hundreds of pages of online documentation and not in the Consultation Booklet. A printed copy of the Preliminary Environmental Impact Report supplied to the Parish Council, contained only the main chapters in the document and not the appendices available online. During poorly-attended webinars requiring pre-registration and held at inconvenient times, Sunnica admitted that the telephone consultation line had not been very busy, unsurprising as the telephone number is located in small text on the last page of the Consultation Booklet. The lack of any physical consultation events remains a concern. Complaints of long delays in receiving answers to questions submitted to the info@sunnica.co.uk enquiry email address are still being received. Given the long-term nature of the scheme and the current situation with Covid-19 and Brexit, it is felt that the consultation could be delayed until 2021. It feels that the consultation is being pushed through while people are concentrating on their health and livelihoods and “looking the other way”. It is disappointing to find that amongst responses to this Statutory Consultation, we are seeing the same questions as we did in responses to the Non-Statutory Consultation. We believe that the issues raised and lack of responses to previous enquiries mean that the proposal does not provide opportunities for local communities to influence decisions that affect us. The lack of time, clarity and engagement by Sunnica has meant that the Parish Council has severe concerns about the effectiveness of the consultation in properly presenting the true impact of the scheme on parishioners and the local area.