

FRECKENHAM PARISH COUNCIL

Jadi Coe
Clerk to the Council

17 Bridewell Close
Mildenhall
Suffolk
IP28 7RB
07759 263349
freckenhamparishclerk@hotmail.com

Sunnica Consultation
FREEPOST REF RTRB-LUUI-AGBY
c/o Newgate Communications
Sky Light City Tower
50 Basinghall Street
LONDON EC2V 5DE

4th December 2020

Dear Sir/Madam,

Subject: Sunnica energy farm

With regard to the proposed Sunnica scheme, I would like to inform you that Freckenham Parish Council objects to the proposal. This position has been confirmed by a household survey during October 2020 when 96% of respondents indicated they were against the proposed scheme as described in the current Statutory Consultation [23].

In summary, Freckenham Parish Council objects on the following grounds:

- Size and scale, need for the development
- Visual appearance, trees and screening
- Effects on wildlife
- Industrialisation, archaeology and loss of productive farmland
- Inefficiencies inherent in the scheme
- Risks of battery storage
- Risks of failure
- No community benefit
- Traffic and disruption during construction
- Health effects
- Sound disturbance
- Lack of a proper decommissioning bond
- Loss of amenity
- Inadequate consultation

At a high level, we reference the government policy UK Solar PV Strategy Part 1: Roadmap to a Brighter Future [1] which lays out four Guiding Principles for the development of solar PV, with Guiding Principle number three as follows: (Numbers in [square brackets] are references to other documents; see the References section at the end of this document for details)

III. *“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*” [2].

In our detailed responses below, we demonstrate that the Sunnica proposal fails to address all aspects of Guiding Principle number three [1], and also the 9 points from the Guidance on Renewable and Low-Carbon Energy [2].

At various points, this document refers to the “Joint Response from SCC/CCC/WSC/ECDC” [3]. We support the findings of the four councils as presented in their joint response document.

- Size and scale, need for the development

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 2792 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. Furthermore, the fact that these schemes have been implemented over time carries less risk from a technological standpoint, since advances in panel design and associated infrastructure are naturally taken into account. Compare this to Sunnica being a single scheme “locked in time” at the point of construction.

The huge size of Sunnica West A and Sunnica East A and B mean that they are much less easy to integrate into the local landscape, and the Joint Response from SCC/CCC/WSC/ECDC [3] notes the inability of the visual mitigation proposed to achieve this integration, with impact on multiple villages including Freckenham.

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 countryside landscape.

The Alternatives site analysis in the PEIR Chapter 4 [20] is incomplete. It contains no information about other sites considered within the 15km radius of the National Grid at Burwell. Together with comments made during Sunnica webinars about energy being taken from the grid and returned at different times (“energy trading”), we are unsure if this scheme is really about solar after all, or if it relies so heavily on energy trading using the battery storage element that it might be better sited closer to a grid connection point.

We believe that these issues mean that the proposal is not appropriately sited, as described in Principle number three [1]. It also goes against points 1, 2, and 9 of the planning considerations laid out in [2].

- Visual appearance, trees and screening

We consider that screening is ineffective and poorly designed, using the cheapest possible planting regime at the expense of mitigation effect. The Joint Response from SCC/CCC/WSC/ECDC [3] 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 [3] 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. Far from

being flat, the land around Freckenham undulates as it transitions from the Fenland landscape to the Rolling Chalklands, exacerbating the effect of the significant panelled areas and making effective mitigation more difficult to achieve.

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. 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, as described in Principle number three [1]. It also goes against points 1, 2, 4, 7 and 8 of the planning considerations laid out in [2].

We believe that the proposed scheme also contravenes Forest Heath LDF Core Strategy Development Plan Document 2001-2026 [4] policies CS3 *Landscape Character and the Historic Environment* and CS5 *Design Quality and Local Distinctiveness*.

Freckenham has an emerging Neighbourhood Plan [5], with many key milestones already achieved. Already published are the Landscape Study (Character and Sensitivity Appraisal), Key Views and Supporting appendices, undertaken by a Chartered Landscape Architect and approved by the Parish Council. In particular we draw attention to:

- Chapter 3 of the Landscape Study which notes “...*the parish is on a transitional position with three character types found in the parish - the east is generally considered ‘Estate Sandlands’, the west ‘Rolling Estate chalklands’ and with fingers of ‘Settled fenlands’ coming in from the North...*” This underlines the importance of designing mitigation that respects the landscape character.
 - Chapter 5 of the Landscape Study which presents a Landscape Value and Visual Sensitivity analysis for each Character Area analysed in the report, with Landscape Areas R1 and R2 (to the North of the village) assessed as Very High and High respectively.
 - The Key Views report which analyses key views around the village and presents Change Management Objectives for each. Viewpoints 2, 3 and 4 look towards the proposed scheme.
- Effects on wildlife

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 The Joint Response from SCC/CCC/WSC/ECDC [3] 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 [21] 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, as described in Principle number three [1]. It also goes against point 1 of the planning considerations laid out in [2].

We believe that the proposed scheme also contravenes Forest Heath District Council Core Strategy Development Plan Document 2001-2026 [4] policy CS2 *Natural Environment* and West Suffolk Council Joint Development Management policy [6] DM10 *Impact of Development on Sites of Biodiversity and Geodiversity Importance*.

- Industrialisation, archaeology and loss of productive farmland

The loss of 2792 acres of valuable farmland must be analysed. Though unfairly categorised by Sunnica as

Grade 3b or 4, the land has been in continuous use as farmland for generations. Carefully managed using rotations of cereals, root crops and livestock, the light soil around Freckenham 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. Given Brexit and the need for UK food security, all productive farmland is needed. We cannot just continue importing food and attempting to export the connected carbon emissions.

What will happen to the land at the end of the 40 years? 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, since this will be judged not by today's legislation but that in 40 year's time.

There are significant areas of buried archaeology around Freckenham village. The Suffolk Heritage Explorer [7] lists 200 finds for the immediate area around Freckenham alone. 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. The timescales for this proposal are a blip on the timeline of the sub-surface archaeological record in this area. 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, as described in Principle number three [1]. It also goes against points 1 and 7 of the planning considerations laid out in [2].

- Inefficiencies inherent in the scheme

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.

Larger fields increases 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, as described in Principle number three [1]. It also goes against point 1 of the planning considerations laid out in [2].

- Risks of battery storage

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 semi-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 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 even under the “Rochdale Envelope” regime.

The BESS site on Elms Road in Freckenham is close to residential development and schools in Red Lodge. Lithium-ion batteries of all chemistries are known to present safety concerns, with reports of a recent fire in a small installation in Liverpool [8]. BESS fires in Arizona US [9] and Korea [10] have led to government agencies suspending the use of these systems, 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. We note that the two applications to

construct 49MW BESS installations at Burwell substation [11] [12] both include substantial efforts to mitigate noise levels with soundproof fencing and careful siting of equipment, and this is with far fewer numbers of containers and with air conditioning units mounted at ground level. This contrasts with the Sunnica proposal where far greater numbers of units would have air conditioning units mounted on top of the containers allowing the sound to travel.

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 [13] 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.

At the beginning of October 2020, we understand that Suffolk Fire and Rescue Service had not been consulted on the scheme, but are nonetheless intending to respond to the Statutory Consultation.

In particular, we expect that the site would be registered under the COMAH regulations, in common with other local businesses handling or making use of hazardous materials.

We believe that these issues mean that the proposal is not appropriately sited, as described in Principle number three [1].

- Risks of failure

Sunnica does not have a track record of developments of this size, with the member companies generally installing projects below 50MW and no stated experience of the NSIP planning regime. This is demonstrated in the level of detail present in the PEIR, generally judged insufficient by the Joint Response from SCC/CCC/WSC/ECDC [3]. 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. It also undermines any confidence in the draft Construction Environment Management Plan, since volumes of incoming freight and hence traffic levels cannot be properly estimated.

We also have significant concerns about promises made during the consultation, given that it was accepted during the webinars that if the DCO was granted the directors of Sunnica would change as further companies or investment funds became involved as investors in the proposed scheme. This means that we are aware that only commitments included in a DCO can be relied upon.

- No community benefit

The webinar presentations noted financial and non-financial benefits, though this information was not found in the consultation documentation. Business people in the village are particularly unimpressed by the suggestion that payment of business rates is a community benefit and not an obligation by any company with premises operating in the area.

We understand that recent legislative changes mean that s106 and s111 payments will be required by the district councils, and this is a welcome development. We expect that the expected costs of highway improvement and increased maintenance would be fully chargeable to Sunnica.

We note that the Joint Response from SCC/CCC/WSC/ECDC [3] states that the improvements to Public Rights of Way (PRoW) are insufficient to meet the requirements for increased public access, and that the proposals put forward by the Rights of Way Officers were not taken up. Together with the closure of all PRoW leading from the village during the two-year construction period, this demonstrates a significant reduction in the amenity value of the proposed scheme.

We believe that these issues mean that the proposal does not provide opportunities for local communities to influence decisions that affect us, as described in Principle number three [1]. It also goes against point 4 of the planning considerations laid out in [2].

We also believe that the proposed scheme contravenes Forest Heath District Council Core Strategy Development Plan Document 2001-2026 [4] Policy CS2 *Natural Environment*.

- 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 [3] 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 device to reduce the number of vehicles.

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 draft traffic management plan [14] shows Heavy Goods Vehicles using Elms Road for the main access point to East B on a section currently closed to HGV, past a point that measures just 4.5 metres from kerb to kerb. 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, with Elms Road being strengthened and provided with proper kerbside surface drainage in the same way as the B1085 quarry access has been improved. Similar improvements would be required on other roads around East A.

HGV routes are shown on the draft traffic management plan [14] as bi-directional, with multiple vehicles per hour, hence there is a significant chance of HGV 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.

- Health effects

The Joint Response from SCC/CCC/WSC/ECDC [3] 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.

Many residents have noted the mental health effects of dealing with the COVID-19 pandemic, resulting employment and financial insecurity, and their attempts to find clear and straightforward information on the Sunnica proposal. All this has caused significant stress and feelings of hopelessness in the local community. Consequently the view of the Parish Council remains that the consultation should have been postponed until 2021 when the matter could be considered by residents in more normal times as set out in a letter from the Parish Council to Sunnica dated 9th October 2020 [15].

Several responses from Statutory Consultees shown in the Scoping Opinion [21], 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 [22] 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.

- Sound disturbance

We note the note in the planning applications for the BESS installations at Burwell [11] [12] 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 [16] 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 [16] 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 [17].

We remain unconvinced that the noise levels from construction, particularly piling and construction traffic,

will be sufficiently mitigated to avoid harming established ecology (and in particular Stone Curlew) at the construction sites. The effect of nesting seasons also does not seem to have been taken into account, since they would apply across all sites.

We believe that the proposed scheme contravenes West Suffolk Council Joint Development Management policy [6] DM14 *Protecting and Enhancing Natural Resources, Minimising Pollution and Safeguarding from Hazards*.

- Lack of a proper decommissioning bond

Commentary during 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 [2]. We note that the Joint Response from SCC/WSC/ECDC/CCC [3] makes a similar point.

- Loss of amenity

The blanket closure of Public Rights of Way (PRoW) in the area for the two-year construction period, specifically the footpaths leading from Mortimer Lane, Green Lane and through Blandings Farm, will have a significant negative effect on the recreation and well-being of residents. These PRoW are used both for connections with other areas (e.g. the footpath through Blandings Farm which connects the Icknield Way to the Circular Walk) and for circular walks and by horse riders (e.g. the footpath on Mortimer Lane, and Green Lane.). They are the only footpaths and bridleways leading to and from the village, as the roadways do not include footpaths.

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 amenity, as described in Principle number three [1].

- Inadequate consultation

We wrote to Sunnica with concerns about the consultation [15], 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. These are the same issues as raised in our response to the Non-Statutory Consultation [18].

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 [19].

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 [19].

The lack of any physical consultation events remains a concern for us. We were able to run an “Awareness

Stall” displaying laminated scheme maps printed at A2 in a Covid-safe environment at several outdoor Farmers Markets in the area. Visitors indicated they felt unable to access this basic understanding of the scheme from anywhere else, and had not understood they might request large print maps for themselves.

Anecdotal reports of long delays in receiving answers to questions submitted to the info@sunnica.co.uk enquiry email address are still being received. We are monitoring these enquiries.

Given the long-term nature of the scheme and the current situation with Covid-19 and Brexit, the Parish Council asked Sunnica to delay the consultation until residents have the capacity to consider the scheme properly. 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 raising the same questions as we did in our response to the Non-Statutory Consultation [18]. 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, as described in Principle number three [1].

- Conclusion

The lack of time, clarity and engagement by Sunnica has meant that Freckenham 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.

Furthermore, through public Parish Council meetings, and engagement with parishioners, community organisations and groups in the village, the Parish Council has resolved to object to the proposal.

Yours faithfully



Jadi Coe
Clerk to the Parish Council

cc.

West Suffolk Council, Suffolk County Council, Matt Hancock MP

East Cambridgeshire District Council, Cambridgeshire County Council, Lucy Fraser MP

▪ *References*

Relevant extracts from documents referenced below are included to assist the reader.

[1] UK Solar PV Strategy Part 1: Roadmap to a Brighter Future, October 2013, BEIS available from [UK Solar PV Strategy - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

[2] Guidance on renewable and low carbon energy available from [Renewable and low carbon energy - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

The deployment of large-scale solar farms can have a negative impact on the rural environment, particularly in undulating landscapes. However, the visual impact of a well-planned and well-screened solar farm can be properly addressed within the landscape if planned sensitively.

Particular factors a local planning authority will need to consider include:

- 1. encouraging the effective use of land by focussing large scale solar farms on previously developed and non agricultural land, provided that it is not of high environmental value;*
- 2. where a proposal involves greenfield land, whether (i) the proposed use of any agricultural land has been shown to be necessary and poorer quality land has been used in preference to higher quality land; and (ii) the proposal allows for continued agricultural use where applicable and/or encourages biodiversity improvements around arrays. See also a speech by the Minister for Energy and Climate Change, the Rt Hon Gregory Barker MP, to the solar PV industry on 25 April 2013 and written ministerial statement on solar energy: protecting the local and global environment made on 25 March 2015.*
- 3. that solar farms are normally temporary structures and planning conditions can be used to ensure that the installations are removed when no longer in use and the land is restored to its previous use;*
- 4. the proposal's visual impact, the effect on landscape of glint and glare (see guidance on landscape assessment) and on neighbouring uses and aircraft safety;*
- 5. the extent to which there may be additional impacts if solar arrays follow the daily movement of the sun;*
- 6. the need for, and impact of, security measures such as lights and fencing;*
- 7. great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting. As the significance of a heritage asset derives not only from its physical presence, but also from its setting, careful consideration should be given to the impact of large scale solar farms on such assets. Depending on their scale, design and prominence, a large scale solar farm within the setting of a heritage asset may cause substantial harm to the significance of the asset;*
- 8. the potential to mitigate landscape and visual impacts through, for example, screening with native hedges;*
- 9. the energy generating potential, which can vary for a number of reasons including, latitude and aspect.*

The approach to assessing cumulative landscape and visual impact of large scale solar farms is likely to be the same as assessing the impact of wind turbines. However, in the case of ground-mounted solar panels it should be noted that with effective screening and appropriate land topography the area of a zone of visual influence could be zero.

[3] Joint Response to the Sunnica Energy Farm Statutory Consultation from Suffolk County Council, West Suffolk Council, East Cambridgeshire District Council and Cambridgeshire County Council.

[4] Forest Heath LDF Core Strategy Development Plan Document 2001-2026 available from [Forest Heath Core Strategy \(westsuffolk.gov.uk\)](http://www.westsuffolk.gov.uk)

Policy CS2

Natural Environment

Areas of landscape, biodiversity and geodiversity interest and local distinctiveness within the District will be protected from harm and their restoration, enhancement and expansion will be encouraged and sought through a variety of measures. Links between such areas will also be sought. Measures will include:

....

- *using Landscape Character Assessment (LCA) to inform development decisions within the District;*

....

Where mitigation measures are employed they will result in a net gain of biodiversity for the District. Proposals should also seek to incorporate:

....

- *adequate and appropriate landscaping and natural areas informed by Landscape Character Assessment; and*
- *increased public access to the countryside through green corridors, these should create convenient and attractive links and networks between development and the surrounding area.*

....

New development will also be restricted within 1,500m of any 1km grid squares which has supported 5 or more nesting attempts by stone curlew since 1995. Proposals for development within these areas will require a project level HRA (see Figure 3). Development which is likely to lead to an adverse effect on the integrity of the SPA will not be allowed.

Policy CS 3

Landscape Character and the Historic Environment

- *The quality, character, diversity and local distinctiveness of the District's landscape and historic environment shall be protected, conserved and, where possible, enhanced.*
- *Proposals for development will take into account the local distinctiveness and sensitivity to change of distinctive landscape character types, and historic assets and their settings. Landscape types are described in the Forest Heath Landscape Character Assessment (LCA).*
- *The Landscape Character Assessment will inform detailed assessment of individual proposals. All schemes should protect and seek to enhance overall landscape character, taking account of the key characteristics and distinctiveness of the landscape and the landscape setting of settlements.*

Policy CS 5

Design Quality and Local Distinctiveness

All new development should be designed to a high quality and reinforce local distinctiveness. Design that does not demonstrate it has regard to local context and fails to enhance the character, appearance and environmental quality of an area will not be acceptable. Innovative design addressing sustainable design principles will be encouraged, if not detrimental to the character of the area.

Regard should be taken of current good practice concerning design, and any local design guidance adopted by the Council.

[5] Freckenham Neighbourhood Plan, including Landscape Character Assessment, Key Views and Supporting Appendices available from [Neighbourhood Plan \(suffolk.cloud\)](https://www.suffolk.cloud/Neighbourhood-Plan)

[6] West Suffolk Council Joint Development Management Policies Document available from [JDMPD-FINAL-for-website-R.pdf \(westsuffolk.gov.uk\)](https://www.westsuffolk.gov.uk/Assets/Document-Management/2019/04/JDMPD-FINAL-for-website-R.pdf)

Policy DM10

Impact of Development on Sites of Biodiversity and Geodiversity Importance

When considering development proposals which may have an adverse impact on nature conservation sites or interests, the local planning authority will have regard to the expert nature conservation advice provided by Natural England, the Suffolk Wildlife Trust and other specialist sources and the following criteria:

- a. *the ecological or geological value and objectives for which the site was classified or designated;*
- b. *the integrity of the site in terms of its wildlife value, its diversity and relationship with other ecological resources;*
- c. *the cumulative impact of the proposal and other developments on the wildlife or geological value of the site;*
- d. *the presence of protected species, habitat areas and wildlife corridors, or geological features, and proposed measures to safeguard and enhance them;*
- e. *the opportunity to create new habitat areas and to improve the conservation status of locally vulnerable species;*
- f. *guidance set down within Biodiversity Action Plans (BAP), habitat management plans and other relevant sources; and*
- g. *the extent to which the imposition of conditions or planning obligation:*
 - i. *would mitigate the effects of the development and/or protect the geological or nature conservation value of the locality;*
 - ii. *ensure replacement habitat or features; and/or*
 - iii. *ensure that resources are made available for the future enhancement and management of the replacement habitat or feature to enable it to attain the quality and attributes that have been lost*

Proposals for development which would adversely affect the integrity of areas of international nature conservation or geological importance, as indicated on the Policies Map, will be determined in accordance with the Conservation of Habitats and Species Regulations 2010 (as amended).

Proposed development likely to result in adverse effects to a SSSI will not be permitted unless the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of SSSIs.

Proposals which would result in significant harm to biodiversity, having appropriate regard to the 'mitigation hierarchy', will not be permitted.

Note: With respect to criterion g) the provision of replacement habitat or features is viewed as a last resort, rather than a regular development tool. Where compensation has been established as an acceptable approach, it will be necessary to provide replacement areas of at least equivalent value to the lost habitats. The local planning authority will normally expect new habitats to be in place to a satisfactory standard before the original habitats are lost.

Policy DM14:

Protecting and Enhancing Natural Resources, Minimising Pollution and Safeguarding from Hazards

Proposals for all new developments should minimise all emissions and other forms of pollution (including light and noise pollution) and ensure no deterioration to either air or water quality. All applications for development where the existence of, or potential for creation of, pollution is suspected must contain sufficient information to enable the Planning Authority to make a full assessment of potential hazards. Development will not be permitted where, individually or cumulatively, there are likely to be unacceptable impacts arising from the development on:

- *the natural environment, general amenity and the tranquillity of the wider rural area;*

....

[7] Suffolk Heritage Explorer results for Freckenham available from [Record Search - Suffolk Heritage Explorer \(heritage.suffolk.gov.uk\)](https://heritage.suffolk.gov.uk)

[8] Solar Power Portal report of fire at Carnegie Road battery storage site available from [Ørsted confirms fire at Carnegie Road battery storage site | Solar Power Portal](#)

[9] Bloomberg reports Explosions Threatening Lithium-ion's Edge in a Battery Race available from [Explosions Threatening Lithium-Ion's Edge in a Battery Race - Bloomberg](#)

[10] S&P Global reports Burning Concern: Energy storage industry battles battery fires available from [Burning concern: Energy storage industry battles battery fires | S&P Global Market Intelligence](#)

[11] ECDC Planning Application 17/02205/FUL available from [17/02205/FUL | Development of a 49.9MW battery storage facility, bridge and associated infrastructure | Land North West Of Electricity Sub-Station Weirs Drove Burwell \(eastcamb.gov.uk\)](#)

[12] ECDC Planning Application 19/00155/FUL available from [19/00155/FUL | Application for the construction and operation of a 49.9MW battery storage facility, fencing, landscape planting and site access on land adjacent to the operational Burwell 400kV substation | Site South East Of Burwell Main Sub-Station Weirs Drove Burwell \(eastcamb.gov.uk\)](#)

[13] Letter to Sunnica from Dr Edmund Fordham dated 18th November 2020, “Sunnica Solar Farm Consultation: Battery Energy Storage Systems (BESS) BESS component under-specified: Information required for meaningful Consultation.”

[14] Sunnica PEIR Appendix 13B Construction Traffic Management Plan available from [SEF-PEIR_Chapter-13-Appendix-13B-Construction-Traffic-Management-Plan.pdf \(sunnica.co.uk\)](#)

[15] Letter to Sunnica from Freckenham Parish Council dated 9th October 2020 available from [9.10.20-Sunnica-stat-consultation-complaint.docx.pdf \(suffolk.cloud\)](#)

[16] Sunnica PEIR Appendix 11D Operational Noise Modelling available from [SEF-PEIR_Chapter-11-Appendix-11D-Operational-Noise-Modelling.pdf \(sunnica.co.uk\)](#)

[17] Sunnica PEIR Chapter 3 Scheme Description available from [Jack Douglas Report Sunnica Energy Farm 2019-05-08 \(sunnica.co.uk\)](#)

[18] Freckenham Parish Council response to the Sunnica Non-Statutory Consultation dated 26th July 2019 available from [FINAL-response-to-Sunnica.pdf \(suffolk.cloud\)](#)

[19] Sunnica Non-Statutory Consultation Booklet available from [Sunnica-Booklet-21Sep20.pdf \(sunnica.co.uk\)](#)

[20] Sunnica PEIR Chapter 4 Alternatives available from [SEF PEIR Chapter4 Alternatives Design Evolution \(sunnica.co.uk\)](#)

[21] Sunnica Scoping Opinion adopted 23rd April 2019 available from [Scoping Opinion \(planninginspectorate.gov.uk\)](#)

[22] Sunnica PEIR Chapter 14 Air Quality available from [Jack Douglas Report Sunnica Energy Farm 2019-05-07 \(sunnica.co.uk\)](#)

[23] Freckenham Parish Council Sunnica Household Survey 2020 available from [Freckenham-Parish-Council-Sunnica-Survey-2020-results.pdf \(suffolk.cloud\)](#)

Freckenham Parish Council Sunnica household survey October 2020

Survey Question
During the Non-Statutory Consultation last year, villager surveys indicated overwhelming opposition to the Sunnica scheme. Now you have seen the details of the scheme in the current Sunnica Statutory Consultation, are you in favour of the scheme?

Response	Percentage
Yes/For	0.00%
No/Against	96.70%
No view	3.30%

