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DISTRICT COUNCIL**
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This matter is being dealt with by:

Andrew Phillips

Sent by Email

Telephone: [REDACTED]
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Unique 20031149
Reference:
Your ref

Date: 13 July 2022

Dear Mr Kean

RE: Application by Sunnica Ltd for an Order Granting Development Consent for Sunnica Energy Farm Project – Procedural Deadline A

Thank you for your letter dated 28 June 2022.

Written submissions on the Examination Procedure

There is no objection to the use of virtual methods for future Examination hearings.

East Cambridgeshire District Council submitted a joint response with the three other host authorities to the Examining Authority's letter of 4 May 2022 inviting comments on the timing of the Preliminary Hearing. In that response the Councils highlighted their concerns in respect of the holding of the Preliminary Meeting in the week commencing 18 July, at the start of the summer holiday season.

At present East Cambridgeshire District Council considers that the following issues would benefit from fuller consideration at Issue Specific Hearings:

- Landscape (including loss of trees and impact historic landscape) and visual amenity
- Ecology and nature conservation
- Battery storage and safety
- Soil quality/best and most versatile agricultural land and impacts on agriculture and farming operations

Please see below for other points.

Requests to be heard orally at the Preliminary Meeting

East Cambridgeshire District Council will be represented in person at the Preliminary Meeting and may wish to speak to Agenda Items 2, 3, 4 and 6. Brief comments on Items 3 and 4 are set out in this response below.

Item 3 – Initial Assessment of Principal Issues

Under point 2 does this cover the benefit of the scheme/how close the scheme is to carbon neutrality. In addition is the lifetime of the development being considered here or under specific issues (for example potentially landscape)?

Within point 4 and 5, are we covering the impacts that might fall under point 40 in regards to desirable place to live and tourism/visitors? In addition, under point 4 is air quality/dust management being discussed?

In regards to point 11, it should be clearer that long term maintenance of biodiversity net gain will be duly considered and the impact decommissioning will have on biodiversity.

In relation to points 31-34, it should be clear that the cumulative impacts will be discussed.

Item 4 – Draft Examination Timetable

It is requested that the Preliminary Meeting is delayed by a couple of weeks in order to allow provide a clean break between the developer's recent consultation, allow for amendments (if they are coming) to be submitted and give chance for Parish Council's time in order to meet to discuss the application before the process starts.

We have been advised that the placing of Specific Issue Hearing on the Draft DCO on the 27 July 2022, a day after Preliminary Meeting, is unusual. However, notwithstanding this given this will be before the Local Impact Report (currently due 17 August 2022) and Written Representation (we are aiming to take a report to a Planning Committee week commencing 22 August 2022) it will mean anything raised on the 27 July would be informal only. Therefore, can this meeting be placed after the 30 August 2022 in order to give more merit to the is meeting.

Requests to be heard at notified Issues Specific Hearings

Officers of East Cambridgeshire District Council (including those representing them) request to speak at all specific hearings, this might be in person or via zoom.

Requests to be heard at notified Open Floor Hearings

Officers might wish to attend these hearings, though it is understood these are more for members of the public to raise concerns and on this basis officers will not be seeking to speak at these.

Suggested locations for site inspections

- The Ark, a location the Councils consider visually sensitive: long distance views from this location across Sunnica East B – a good vantage point.
- Chippenham Park/La Hogue Road, a visually sensitive historic landscape: the landscape is currently very open with far reaching views; the proposals will transform this landscape either into a visible solar landscape or change the open character in an attempt to mitigate the visual impact of the solar panels and infrastructure (both options are unacceptable within the historic landscape).
- The Avenue: an integral part of the historic landscape around, and setting of, Chippenham Park; the solar proposals, including the embedded mitigation threaten the legibility of this historic feature within the landscape.

- Chippenham Road (east of Snailwell),
 - the footpath leading towards Sunnica West A: open views across the undulating landscape would be curtailed by mitigation planting
 - the road itself: the avenue of young trees would potentially be affected in several places, potentially eroding this landscape feature.
- Burwell, land for Option 2: potential compulsory purchase, proximity to residential properties.
- Dane Hill Road, Views from cottages to W 15 and road works: neither potential views from the cottages and from the road to W15, nor the landscape and visual effects of proposed, but not specified changes to the road as part of the DCO have been sufficiently assessed.
- Footpath, south-east of Chippenham Fen: potential views from sections of the footpath to Sunnica West B do not appear to have been sufficiently assessed and further mitigation may be required.
- Fordham Road, north of Snailwell:
 - field gate, views towards Sunnica West B: potential views to Sunnica West B do not appear to have been sufficiently assessed and further mitigation may be required.
 - bridge, views towards Sunnica West B: potential views to Sunnica West B do not appear to have been sufficiently assessed and further mitigation may be required.
- Horse Racing Training Grounds west of Sunnica West B (private, but close range): potential views to Sunnica West B do not appear to have been sufficiently assessed and current mitigation proposals are considered insufficient.
- Newmarket Road at Fordham Abbey: entire tree belt on eastern side included in DCO limits with no clear justification or specification of works other than 'works to existing streets to facilitate access to Work Nos. 1 to 8' in the Draft DCO.

Yours sincerely

Andrew Phillips
 Planning Team Leader