

**Summary of Relevant
Representations of West
Suffolk Council Sunnica
Energy Farm (EN010106)**

20031311

19 October 2022

WSC has in general adopted a supportive approach to renewable and low-carbon energy schemes, however, significant concerns remain and WSC considers that development consent should not be granted for the proposal as submitted.

Policy Framework

- WSC agrees with the applicant's that National Policy Statement EN-3¹ does not 'have effect' for the purposes of S104 of the Planning act 2008.
- Given that draft EN-3 may be designated before the conclusion of the examination, or the grant of consent, the Applicant should address matters raised by draft EN-3.

Cultural Heritage

- WSC agree in principle to the methodology used for assessing impacts on built heritage.
- Freckenham Conservation Area needs to be denoted as a single entity.
- The Applicant should address whether the proposal will affect the character and appearance of the Freckenham and Exning conservation areas.

Landscape and Visual Amenity

- The scale, longevity and geographical distribution of the proposed development are likely to result in significant adverse impacts from intra-cumulative and accumulated effects.
- The ES assessment under-estimates impacts.
- Mitigation proposals are not sufficiently tailored across a variety of landscape character types and are not ambitious enough to deal with the degree of harm caused.

Ecology and Nature Conservation

- The applicant should avoid the most sensitive habitats, deliver appropriate mitigation and compensation as well as ecological enhancements.
- The success of any measures is dependent on future management and monitoring.

Community Impacts

- The ES does not recognise the change to the sense of place and recreational amenity of affected villages and the need to mitigate/compensate for these impacts.

Noise and vibration

- The submission lacks detail in the assessment of adverse amenity impacts and reliance on fixed limits can underestimate the impact on receptors.
- Monitoring procedures should be adopted within the CEMPs and vibration monitors installed at key sites during specific periods.

¹ [1940-nps-renewable-energy-en3.pdf \(publishing.service.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/344211/1940-nps-renewable-energy-en3.pdf)

- Construction hours are proposed to be 0700-1900 Mon-Sat. Construction hours are restricted in West Suffolk to 0800-1800 Mon-Fri, 0800-1300 Sat and at no time on Sundays, Public or Bank Holidays.

Socio-economics and Land Use

- The Council is aware of community concerns regarding the reliability of the Applicant's soil survey data.
- There remains a lack of recognition of the importance of emerging local plans and projects.
- No sizeable gain in permanent employment numbers, though investment in employment opportunities and green energy is welcomed.
- The opportunities highlighted in the Outline Skills, Supply Chain and Employment Plan are welcomed but the Applicant needs to demonstrate this will be delivered.
- Negative influence on tourism and visitor numbers.

Transport and Access

- SCC, as local highway authority, have concerns regarding the Transport Assessment methodologies, the assessment of Transport and Access impacts and lack of protective provisions in the DCO.
- Lack of detail as to the highway works for the purposes of facilitating access and the passage of abnormal indivisible loads.
- Concerns as to the suitability of narrow rural lanes for construction traffic and the impact on street U6006.

Air Quality

- The impact of additional road traffic during construction is not identified as significant.
- Impacts during the operation have been scoped out due to the small number of vehicle movements.

Human Health

- Conclusions in the Human Health chapter cannot be verified until the local highway authority has accepted the information submitted in the Transport and Access chapter.
- Impacts on non-motorised users result in a negative health impact on accessibility, active travel, social cohesion and lifetime neighbourhoods.
- Applicant's failure to recognise stress and anxiety caused to the community.

Other Environmental Topics

- Glint and Glare - parties with an interest in this topic should be consulted.
- Ground conditions - the Ground Conditions Phase 1 Preliminary Environmental Risk Assessment report is accepted.

- Major Accidents and Disasters - with the exception of the Outline Battery Fire Safety Management Plan there is no specific detail on the risks associated with major accidents and disasters.

Battery Fire Safety

- Significant concerns remain in the community.
- SFRA has indicated that the OBSMP appears to meet the requirements outlined by SFRA during the consultation process
- WSC remains concerned by the lack of detail on the size of the BESS and the technology to be utilised so that the impact of a battery fire cannot be fully assessed.
- Potential for impacts on controlled waters.
- WSC is unable to evaluate the Unplanned Atmospheric Emissions from Battery Energy Storage Systems report.

Fuel Consumption

- The applicant should set out an approach to reduce fuel consumption and associated emissions.

Construction Standards

- The Considerate Constructors Scheme is not a robust enough standard to adopt.

Impact on Horse Racing Industry

- Newmarket is recognised as the international home of horse racing and plays a significant role in terms of its economic importance and social/cultural influence.
- The Limekilns gallops are identified in the Newmarket Neighbourhood Plan as an historic and protected view. Sunnica West A will be directly visible from the Limekilns, which will detract from the attractiveness of Newmarket as a place in which to breed/train racehorses.
- The applicant has failed to conduct a detailed, genuine assessment of the impact of the proposal on the horse racing industry.