

I do not agree with the proposed Sunnica Energy 'Farm' development because:

- 1 The scheme is a vast Solar Battery Station masquerading as a Solar Farm which is designed primarily as an arbitrage scheme to buy, store and re-sell electricity for profit to the National Grid.
- 2 Due to the 'lifetime' greenhouse gas emissions arising from the scheme, it will never deliver the carbon neutral requirement of the plan and net zero target aim of the Government.
- 3 The Cumulative Size of the scheme – effectively four individual large solar sites – is excessive, the impacts and consequences of which – during construction, operation, decommissioning and post-operation – are complete unknowns, there being no precedent for a scheme of this size either in the UK or the whole of Europe, and as demonstrated further overseas, large schemes have proved detrimental to the land, landscape, environment and local communities.
- 4 The proposed linked solar sites would enclose all of the local villages, significantly affecting the daily lives of residents during construction, operation, decommissioning and post-operation. The enormous visual impact is not confined to boundaries of the scheme but well beyond, stretching across significant areas of Suffolk and Cambridgeshire.
- 5 Sunnica have publicly acknowledged they are exploiting the requirements of an NSIP to ensure local level decision making is bypassed, cannot be challenged, turned down or resisted by local authorities and communities, undermining local democracy and demonstrating Sunnica's contempt for the local community.
- 6 No evidence has been demonstrated that there will be any benefit - in any way whatsoever - to the residents of the area and local community whose environment have been so compromised.
- 7 Conversely, the proposed plans will negatively affect tens of thousands of local people who have invested their lives, homes, businesses, and childrens future in the area – it is horrific to think that any Government should intend by its' policy that via the demands of a few opportunistic and largely absent landowners, foreign investors, overseas slave labour and hostile Compulsory land acquisitions a development of this nature could be permitted unchallenged by the communities it affects most.
- 8 The location is totally unsuitable – being home to ecologically sensitive areas and adjacent to or in close proximity of NNRs, SSSIs, AONB, SAC, CWS, PRV, RNR, Ramsar, Scheduled Monuments, Grade I and II Listed Buildings, High Grade Agriculture Land, Conservation Areas, Rural businesses, villages and homes, a rich and diverse nature friendly environment, places to walk and ride, quiet country roads and unspoilt views – all of which will be destroyed and replaced by wholesale industrialisation of the countryside.
- 9 The scheme would result in a severe loss of Nationally important habitats for wildlife and rural views across important natural landscapes, both within and well beyond the boundaries of the scheme.
- 10 These vitally important, environmentally sensitive landscapes have taken millennia to evolve – they will never recover from development and industrialisation.
- 11 The scheme fails to fulfil points of the Governments Ten Point Plan for a Green Industrial Revolution, destroying not protecting the Natural Environment, landscape and ecosystems and making redundant existing rural jobs not creating more Green Jobs.

- 12 The local community – both authorities and residents – have no guarantees of future impacts on the locality post-operation after de-commissioning, should such a scheme be permitted. From critical safety and security issues to permanent change of use of farm and high grade agricultural land to brownfield site, and impacts on land and property values. Failed and decommissioned schemes overseas have been left as dangerous industrial wastelands.
- 13 Opposition to the Scheme throughout the locality is virtually unanimous – all County, District and Parish Councils, Consultees and over 95% of more than 40,000 residents object to it.
- 14 The local area has already embraced renewables having given over substantial areas to smaller solar farms, namely at Soham, Burwell, Stretham, Great Wilbraham, Lakenheath, Exning and Red Lodge with further projects to come.
- 15 The relative proximity of the Scheme to the Burwell substation is a key factor in the location currently proposed. There are many other areas nationally more suitable to an energy farm development, but in my opinion, none whatsoever, where a Scheme of this size could be developed without significant detriment to its locality.
- 16 Since the original application was made critical factors concerning Land Use have further developed – Food Security and Environmental challenges, Energy costs, climate change, population increases and the War in Ukraine impacting supply chains of food and commodities.
- 17 England is a small country with a huge and increasing population. It does not enjoy the (relatively) infinite plains of the US or Australia on which to site industrial development.
- 18 In England the appropriate use of land is therefore critical.
- 19 Land is a FINITE resource – Food Security should be prioritised. Any loss or change of use of productive agricultural land/farm should be resisted.
- 20 East Anglian is noted for the highly productive fenland primarily in the north of the region. At 1500 square miles (388,498 hectares) the Fens include half of the most productive agricultural land in England with nearly 40% of England’s vegetables grown there supporting a food chain worth £3bn to the economy. However, much of its highly-productive soil is below sea level and at serious risk from flooding as a consequence of climate change, threatening the profitability of agriculture and food security.
- 21 In addition, continual soil erosion and the consequences of hundreds of years of intensive land management is threatening soil quality; it is considered future active agricultural use of the Fens could cease in less than 30 years. Regionally and nationally, we cannot afford to take any productive farmland out of production.
- 22 New industrial, energy and housing developments should be sited away from productive and protected landscapes. Solar energy developments should only be permitted on brownfield, new housing, new and/or existing commercial and industrial sites.
- 23 I am aware the ASIs have been extremely helpful in demonstrating both the vast unwieldy size and piecemeal nature of this ill-conceived and incomprehensible scheme.
- 24 ASI1 and ASI3 demonstrating all too clearly the shocking reality the impact the proposed scheme would have on this historic rural environment, high quality agricultural landscape, special ecology and heritage asset values which dominate the area and that would be destroyed by any development.
- 25 The ASIs served to confirm my view of the total inappropriateness – without exception – of the location of the Solar Arrays, Inverters, Solar Stations and cabling proposed for W01 and W02.
- 26 It also became clear that the obvious logistical challenges presented do not appear to have been fully considered by the Applicant.

- 27 I am aware the ASI1 coach had difficulties accessing the sites once away from the trunk roads – a number of the sites being only accessible by local village roads and lanes – therefore access for the far larger equipment required during the two years of construction of the scheme will prove impossible without significant disruption, long term road closures and costly re-routing, including of essential and emergency services as highlighted by the Fire and Rescue Service.
- 28 Cabling under both the A11 and River Snail and obtaining numerous access points through land acquired via compulsory purchase acquisition is unacceptable.
- 29 ASI1 and ASI3 demonstrated the negative impact – there are no positives – logistical issues and impracticable solutions the applicant is suggesting; these will only be magnified as the scheme is further examined.
- 30 From the outset Sunnica has refused to engage meaningfully with the local community; the quality of project information throughout has been poor, as has access to it; even at this stage there are still too many unknowns – from the key issue of a ‘possible’ connection to the National Grid from a ‘possible’ substation within West Site A to smaller detail; the applicant failing to distinguish between permanent and temporary elements within the boundaries of the scheme, failing to represent elements at the correct scale, failing to provide details of specification, design and function of the proposed Inverters and Solar Stations and insufficient/inappropriate Green Infrastructure mitigation.
- 31 Sunnica has yet to address serious safety concerns particularly regarding BESS locations or to provide comprehensive factual information – errors/omissions, incomplete/ misleading information in respect of size/scale and location of Battery stations/Solar panels, roads, footpaths, access and viewpoints still remain.
- 32 Sunnica exploited the social restrictions imposed during the Covid Pandemic and refused to engage with the community in-person since the relaxation of them. They have repeatedly attempted to change timetables and force through late changes to the application without the opportunity for proper consideration.
- 33 Sunnica has persisted in using outdated Grading to assess and classify Agricultural Farmland. At the Special Planning Committee Meeting of East Cambridgeshire District Council on 3 November 2022 independent analysts in attendance provided evidence that the classifications Sunnica have used are incorrect.
- 34 A proposed scheme of this size would be of National importance with total national, locality-changing and precedent-setting significance. An NSIP should be of National benefit and as such criteria for selecting suitable sites should be followed, evaluating each for impacts, benefits and constraints. Such a strategy would never have permitted the development Sunnica is proposing in this location to even be considered.