



7th November 2022

Planning Inspectorate
Temple Quay House
Bristol

Representation on the application for consent by Sunnica Ltd for Sunnica Energy Farm,
case ref: EN010106

Registration identification 20030080

Dear Sir,

EXECUTIVE SUMMARY

Further to my initial registration summary of objection to this proposal, I wish to make the following points with particular reference to Sunnica East, site B. I am resident at the western end of the village of Worlington, adjacent to Worlington Heath and close to the B1102. I am a regular recreational user of the U6006 Badlingham Lane and whilst I am particularly concerned about the future of the lane, I am also greatly concerned that this vast proposal would damage every aspect of our lives.

I have endeavoured to read as much as possible of the documentation produced, including detail in the various appendices, but to absorb it all, even the parts relevant to my particular location, is impossible within the constraints of a normal life. There is insufficient brevity and clarity in the documentation for local residents to be confident that the project will be constructed and managed without causing unnecessary disruption and damage to their environment. Neither can I have any confidence that survey work has been carried out thoroughly and that local factors such as soil type, vegetation cover, resident fauna and road network have been properly understood. It is my view that the applicant has completely disregarded the needs of local residents.

From my point of view as a resident this is potentially a hugely destructive scheme, which has not been presented with the benefit of thorough data, local knowledge, clarity of purpose or sufficient challenge from the Planning Inspectorate. Indeed the communications from the Planning Inspectorate are nearly as verbose and confusing as the application itself, which is unacceptable when the cumulative effects of this proposal mean it would affect every aspect of residents' lives.

In detail my concerns are as follows:

1. The process followed, with reference to the methods and attitude of the applicant and the response of the Inspectorate.

This application appears to be speculative and is being imposed on local communities based on the willingness of some local landowners to give up farming. There is no evidence that other sites, (or types of sites such as roofs or derelict land), have been given serious consideration. Neither has any justification been presented for such a massive loss of farmland and rural space for relatively little power generation. I have formed the impression that it is the battery storage that is most important to the applicant – it will enable Sunnica not only to store its own power but to buy cheap power from the grid and sell it back for profit when demand is high. If I'm correct, this is not entirely a solar power application and this should have been made abundantly clear to interested parties from the start. Neither have I seen any independent, verifiable data that would suggest that the project is, on balance, environmentally beneficial (see ES 6.1 Ch18 table 18-2).

There has been no meaningful discussion with local residents with regard to their welfare or amenity, and there is no evidence that local communities will profit in any way from the scheme. For an application on this vast scale, this lack of robust, challengeable information and meaningful engagement is a real failure. In my view, the Inspectorate has provided insufficient challenge to the information it has received, and I sincerely hope this will change during the inquiry.

I have personal experience of trying to ask questions of Sunnica management and their PR representative having sought clarification on a matter of site boundaries from them face-to-face. I was taken aback by the tone of the response I received, the gist of which was that they were going to see what they could get away with and then consider compulsory purchase of an individual's land. I could not understand why they would chose to respond to a civil question in such a way and it caused me to believe there is a serious lack of regard given to us "receptors" (people). Further details including quote, location and the names of persons concerned are available on your request.

2. The effect of the proposal on the natural environment and residential amenity

One of my biggest concerns is the future of the U6006 Badlingham Lane, which is a beautiful rural track with varied and unusual Breckland scenery and noted areas of uncommon flora. It is currently available for the enjoyment of the whole community. When footpaths north of the village close to the River Lark become very wet in winter, Badlingham Lane becomes our most passable recreational path. It is also a track of historic origin- it is referred to by some residents as Green Lane and has some indicators of a drover's track. It's level of importance to the local environment warrants it being considered a heritage asset for the purpose of this application.

Documentation indicates that the track will be closed during the construction phase of development, but the documentation does not make the intended use of the route clear. As it is designated as an unclassified road, does this mean it can be used as an access and as a vehicle route between parts of the site? Such use would be as destructive to it's present natural unsurfaced character as would panels either side. The documentation makes it clear

that the effect on the track will be significant and permanent, and this would represent a serious loss to residents and nature.

I am also concerned by the lack of attention given in wildlife surveys to the area of grassland between Badlingham Lane and the B1102 Freckenham Road, (Worlington Heath). For example ES 6.2 Appendix 8i Fig 3, stone curlew survey stopping points miss out Worlington Heath and the grassland as far as Badlingham Lane, where there are plenty of sightings. As my home backs onto this area, I am very aware of skylark, stone curlew, oyster catcher, lapwing and plover frequenting the grassland and adjoining farmland. The night-time calling of field birds is an important part of the area's character. I am also concerned that our gardens and those in the wider village were not surveyed, work being restricted to within 50m of site. We are visited by common garden species, including jay, various woodpeckers, field fare, song thrush, sparrow hawk, goldcrests and little owls. Blackcaps sometimes overwinter in the garden. We have also had brambling, tree sparrow, woodcock and turtle dove visit occasionally. Large flocks of goldfinches and long tailed tits are common visitors in winter. Neither is there mention in the report of the village's thriving summer swift colony, or the various groups of house sparrows that inhabit areas close to the site.

The same is true of fauna: the document seems to underplay the extent of animal life. There is no record of the bats that frequent the trees in our gardens at the edge of the site, or of our resident amphibians - we have toads in the garden and have occasionally been visited by smooth newts. Further attention should also be given to the thriving hare population in the fields either side of Badlingham Lane.

The documentation contains no real safeguards for existing hedgerows, shelterbelts and trees: the ES is full of intentions to protect existing flora 'where practical' (e.g. 6.5 Schedule of Environmental Mitigation, 116; and ES 8 table 8.10 "Boundary vegetation such as mature hedgerows connecting woodland sites, will be retained as much as is practicable"). This is not acceptable and only serves to emphasise that the survey work has been carried out in insufficient depth. It also raises the question of how decisions about such things will be made on the ground. If the developer makes them, then clearing vegetation which might overshadow panels or limit access will presumably be at the forefront of decision making.

3. Construction: levels of disturbance and local infrastructure capacity

The entire area subject to this proposal is repeatedly written off in the documents as 'sparsely populated' (Preliminary EIA 4.8.2) and 'lightly trafficked' (e.g. ES 6.2 App 13B Transport Assessment). By what standard is not explained, and I have not seen a calculation of the number of affected residents across the area. Considering the size of the entire site, thousands of people must be directly affected. This area has experienced considerable population growth in recent years, especially with the development of Red Lodge, and growth will continue with the proposed extension to Mildenhall. This has put pressure on local infrastructure.

The roads connecting Worlington to other settlements and the A11 could once have been considered rural backroads, but are now quite hazardous due to insufficient upgrading. They are narrow, some lacking space for two large vehicles to pass comfortably and many have no footpaths or very narrow footways. Some don't have consistent edges. The road linking Worlington and Red Lodge is a prime example; fast, with areas of restricted visibility, no pedestrian or cycle facilities, potholes at the edge and no markings. The entrance to Bay

Farm illustrates what happens to the condition of the road under heavy traffic. There is no recognition in the application of the obstruction and damage that will inevitably ensue, or who's responsibility it will be to put the damage right.

I couldn't identify any traffic data for the most important access points including La Hogue Road and Elms Road; and there is apparently no traffic survey data for routes through Worlington village even though this will be a construction route. Neither did the Planning Inspector look at the B1102 on the unaccompanied site visit. This is an omission for reason of traffic generation, and also because of the setting of the road between Worlington and Freckenham, which has a great deal of character and some notable sections of shelterbelt.

I am also concerned that the application does not fully take into account the character of our local Breckland soil, (Statutory Nuisance Statement para 4.2.5). This is very light and dry, even in average conditions without accounting for increasingly hot and dry summers; it continually blows into our homes as dust and we have to periodically remove the soil build-up from our roofs. Insufficient regard has been given to the effect of dust-generating construction on such a large scale- spraying is unlikely to make a difference unless it is carried out 24hours per day over the whole area. In previous centuries this area was subject to dust storms and this could happen again with vegetation removal. The ES points out there will be a significant effect on air quality from dust, traffic and plant (Non-Tech summary 7.10.1). As with other parts of the ES, the Statutory Nuisance Statement contains repeated references to things being done "where reasonably practicable" or "if possible". Once again, who decides what is practicable and possible?

On the matter of vegetation, I can also find nothing in the documentation on the methods for forming sustainable vegetation cover under the panels or indeed what constitutes the 'native flora' to be re-instated. Neither is it possible to know which areas will be subject to vegetation protection and which areas will have soil stripped. One part suggests a lot of soil stripping in Sunnica East B, and another part suggests it will be minimal.

4. Cumulative Effects

There is a table in the documentation which lays out the cumulative effects of the application, (6.2 Appendix 17A Effect Interaction matrix), but it does not draw them together in such a way as to describe the totality of all the negative effects on residents, except to point out that by year 15 there will still be "moderate adverse significant" effects on Sunnica East site B. In fact the area in which I live is completely written off with "No additional mitigation measures are available or practicable". (ES 6.1 Ch18 table 18-1)

Whilst making it abundantly clear that the effects on residents of Worlington will be negative and persist over the long term, up to and beyond the 15 year mark, (See ES Non-tech summary 7.6.13), the documentation rejects the idea of any health concerns, (7.11). In fact there are profound health effects. In fact, this proposal has already caused enormous stress, and the effects of the loss of amenity and intrusive construction will so obviously have a profound affect on us in the future. We moved here to be in a relatively rural area, somewhere we could and enjoy the walks and wildlife with our family. We did not expect to be foisted into the middle of a vast power station. Neither did we ever expect to be treated in such a fashion- without the basic courtesy of a well thought out, comprehensively tested and honestly presented proposal taking our lives and the environment into account.

There is some information in the proposal about other major planning applications affecting the area, but this is too generic to be relevant: at the western end of Worlington we are affected by several large proposals, including a suggestion of building up to 70 houses and a separate scheme for a large traveller camp. We are also aware that there may be a new relief road proposed locally. There does not seem to be any co-ordinating process or plan and there is no apparent consideration of the cumulative effect on local residents.

5. Conclusion

According to Sunnica's own mapping, we will be affected by this scheme whatever we do and wherever we go, (For example ES 6.3, Noise contour plot Fig 11.2, Bare Earth 2TV combined Fig 10-11c). We will be affected by it at home in terms of noise and traffic and loss of amenity and wildlife. The same will be true whilst doing the simple local chores we do all the time, whether it be going to the shops, the La Hogue farm shop or the garden centres in Fordham. It will also be true when we walk the dog, drive our regular commute to Ely or visit friends and community centres in Red Lodge. When we go further afield, whichever way we leave Worlington we will see Sunnica. or drive through it, or encounter the construction traffic for it. This proposal is unacceptable and unjustifiable in its total disregard for local people and environment in pursuit of profit.