

The Jockey Club includes Jockey Club Racecourses, (including Newmarket Racecourses), Jockey Club Estates and The National Stud.

The Jockey Club operates under a Royal Charter placing all net profits into the sport of British horseracing. It was founded in 1750 has held land and premises in Newmarket since 1752. Today it is a major landowner in the Newmarket area, owning land in and around the town, including racehorse training gallops, Newmarket Racecourses and The National Stud.

Newmarket is generally accepted in horse racing as being the premier location in the world for the training and breeding of thoroughbred racehorses. The Newmarket racehorse industry underpins the local economy of the area in and around the town and of the town itself. It is one of the two major business clusters in the region, the other being the Cambridge Science Park. The total economic contribution of its equine cluster was estimated in 2014 to be more than £200 million with over 3000 direct FTE employees, including a substantial component of part-time employment, with a further 5000+ attributable jobs within the wider area around Newmarket. The economy of the town of Newmarket is dependent on a thriving equine industry.

Racehorse breeding and training is a valuable part of the local character of the area with its cluster of equine establishments and facilities in and around Newmarket, including the historical gallops on the edge of the town dating back to the 18th Century. This cluster is currently pre-eminent but is always under continued competition in particular from Ireland, France and the USA.

It is not an overstatement to say that racehorse training and breeding at Newmarket is of worldwide renown. The Newmarket equine industry depends, however, upon continued investment by individuals in racehorses and racehorse training and breeding, including in particular high net worth individuals who are footloose and can invest practically anywhere in the world. Newmarket competes not only with other locations worldwide for this investment in horseracing but also with other opportunities for leisure and sport investment both here and abroad. The choice such investors have is wide, not only of different places in the world where they can invest but also of many different sports and leisure pursuits.

Newmarket offers a unique set of factors which attract investors, in particular the historical association with horseracing, including that of the gallops and their integration within the countryside and landscape in which they lie. This includes the highly valued Limekilns gallops, arguably the most historical and highest quality of them all, where winners of many of the most prestigious horse races in the world have trained since the early 18th century, including winners of the July Cup at Newmarket, the Gold Cup and Champion Stakes at Ascot and the Epsom Derby, the Arc de Triomphe in France, the Breeders Cup in America and the Melbourne Cup in Australia. The setting of the Limekilns gallops would be fundamentally changed by the Sunnica proposals from an agricultural backdrop to a landscape including an industrial solar scheme.

The area to the north and north-east of Newmarket is where a number of equine establishments are located and employees live. Not only would there be substantial harm caused by the Sunnica scheme in the short term, with extensive construction works and vehicle movements impacting on visitors and equestrian operatives causing extensive cumulative impact over a short period, but also remaining in place semi-permanently over 40 years. The nature of the Newmarket landscape to its north-east, historic as it is, would be substantially and detrimentally changed by the Sunnica proposals. Sunnica accepts and admits that it would be visible after 15 years from a number of locations without the potential of mitigation, including from the Limekilns. The large expanse of gallops known as the Limekilns is where potential investors are brought to view horses in training. It is also used by the public as an area of recreation in the afternoons all the year round when not

used as gallops. It is highly valued. Views from here would appear industrialised, transformed from an agricultural and equine landscape and part of Newmarket's historical equestrian culture into a landscape with large areas of industrial solar development. This would also be the case when living and moving around the villages, footpaths and roads in the area, especially if on horseback.

The cumulative impact of the separate solar sites, covering such a huge rural area, would have a despoiling effect on the Newmarket horseracing industry. Horseracing in Newmarket extends far beyond the town itself. The town with its cluster of equine facilities and training yards is at the centre and there are then the gallops on the edges of the town. The horseracing industry then extends to include the stud farms dotted throughout the neighbouring villages and countryside. Equine workers live and work in all these areas.

It only takes one major investor to choose not to invest in Newmarket for substantial harm to be caused. That investor is not identifiable by the very nature of footloose investment. It is imperative that all is done to avoid causing potential harm to the major benefits that the horseracing industry brings to the area, by avoiding and not imposing upon it harmful challenges and changes outside its control.

The Sunnica proposals would also cause harm to users of minor roads in the area including through villages such as Snailwell, used by horses and riders, cyclists and pedestrians. During the course of construction and renewal of plant over the scheme's lifetime the traffic especially of HGVs would introduce unwelcome and potentially harmful noise, vibration and disruption to the relatively quiet equine establishments including studs where the breeding of valuable racehorses takes place and which depends upon relative peace and quiet with no sudden noise and disturbance.

Often construction noise and disruption is dismissed as being an inevitable consequence of any major infrastructure project, but in the case of the breeding and training of horses especially thoroughbred racehorses, due to the vulnerable nature of horses, it can cause significantly greater harm than to a normal user of land including an ordinary agricultural unit. In addition, the potential danger caused to horses and riders exercising on the roads should clearly be avoided.

The Sunnica proposals would also cause harm to businesses reliant upon the equine industry, including tourism in and around the area.

The information which has been provided by Sunnica is seriously lacking in detail in a number of respects. In addition, other areas of harm will be caused by the proposals including the following;

- a) Overriding need for the proposals has not been demonstrated,
- b) Inadequate consideration of alternative sites,
- c) Failure to accord with government, National Infrastructure and local development plan policy,
- d) Excessive claims in relation to carbon benefits,
- e) Failure to demonstrate and ensure satisfactory decommissioning,
- f) Failure to demonstrate economic viability of the scheme,
- g) No or minimal benefits to the local area,
- h) Harm to the equine industry in the area and those who rely upon it including local businesses, Newmarket town and employment
- i) harm to ecology,
- j) harm to agriculture,
- k) harm to recreation and rights of way,
- l) harm due to cumulative impact,
- m) harmful impact on villages and communities,

- n) visual harm and harm to the landscape character and appearance of the area,
- o) harm to the area's historic character,
- p) harm during construction including highways, traffic and disruption
- q) harm at the decommissioning stage,
- r) lack of adequate consideration of glint and glare,
- s) inadequate agricultural soil quality and ALC evidence produced
- t) unplanned and insufficiently considered proposals of the solar development areas as a whole including the battery storage facilities (BESS).
- u) It is unclear whether this is a proposal in reality with the principal purpose and use being that of battery storage with an ancillary solar energy farm attached. This would not be within the powers of the 2008 Planning Act.
- v) The safety of the battery storage facilities has been inadequately considered.

The Sunnica proposals comprise an unplanned, ill-considered, poorly designed solar/battery storage development scheme, cause harm and bring no material benefit to the area, segregate villages and communities one from the other and are strung out over a length of some 20 km, maximising cumulative impact and minimising sustainability. The area north of Newmarket and between Newmarket and Mildenhall would in a very short space of time undergo a radical change to an area with 1000 ha of industrial solar panels and battery storage farms, none of which benefit the local area in terms of electricity generation, significant employment or otherwise.

The carbon benefits of the scheme have been exaggerated and lack material information of the lifecycle of the scheme as a whole including plant production, renewal and decommissioning.

It is a very substantial development (understood to be the largest in the UK and possibly Europe), radically changing semi-permanently the historical rural area within which it is proposed from one which has been in agricultural and equine use for centuries into an area with constant visual reminders of large areas of an industrial type of use. The equine and agricultural uses have been in harmony with each other for many centuries without radical change.

The Sunnica proposals are seeking to impose a substantial and large development on the area wholly against the will of those who live and work in the area including their representative Councils. They will radically change the character of this area as a whole over a very short space of time and will bring