



**EAST
CAMBRIDGESHIRE
DISTRICT COUNCIL**
THE GRANGE, NUTHOLT LANE,
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This matter is being dealt with by:

Andrew Phillips

Sent by Email

Telephone: [REDACTED]
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Unique Reference: 20031149

Your ref EN010106

Date: 7 November 2022

Dear Mr Kean

RE: Application by Sunnica Ltd for an Order Granting Development Consent for Sunnica Energy Farm Project – Written Representation Deadline 2

For the avoidance of doubt, the Planning Committee notes the conclusions formed in the joint Local Impact Report. This letter seeks to elaborate or bring specific light on the main concerns of East Cambridgeshire District Council and should be seen as supplementary to the Local Impact Report.

East Cambridgeshire District Council support projects for renewable energy development in accordance with policy ENV6 of the East Cambridgeshire Local Plan 2015.

However, given the size of the Scheme, the period of time it will be in situ, its overall poor quality, the detrimental harm to the long term landscape would not be outweighed by the benefit of renewable energy. The following sections of the development should be removed from the development as a landscaping scheme would not mitigate against the long term harm:

- E05
- W03 – W12

It is considered that the proposal has not met the requirements of chapter 4.5 and para 5.9.8 of EN-1, and also does not comply with chapter 2.51 of the draft EN-3.

The proposal does not provide sufficient information about the impact of the scheme on trees and the surrounding landscape. The Draft Development Consent Order is seeking to allow the developer to cut down trees protected by Tree Preservation Orders (TPO), which is considered unacceptable. The developer is seeking powers to remove important trees and landscape features before they are required to provide a landscape scheme. Given the lack of quality information the proposal is considered not to comply with para 5.3.14 of EN-1 or 2.51.5 of the draft EN-3.

It is considered that the developer has failed to provide adequate reports or understanding of the potential impact on biodiversity within the local area/development site. Specifically it is recommended the following parcels should be removed from the development as this would

lead to the long term detrimental harm to biodiversity within the district to Chippenham Fen (Ramsar and SSSI) and Snailwell Meadows (SSSI):

- W01-W02

On this basis the proposal is considered not to be able to comply with both national and local policy, specifically paras 5.3.5, 5.3.11 and 5.3.18 of EN-1 and para 2.50.11 of the draft EN-3.

The proposal would lead to substantial harm to the setting of the Grade II Historic Park and Garden of Chippenham Hall, specifically the avenue that connects Chippenham Hall to Newmarket. This harm is not outweighed by the provision of renewable energy, as there are other locations solar farms can be located without causing this level of harm to a heritage asset. In addition, the proposed additional landscaping the developer is suggesting will cause further harm to the historic avenue as it will erode what makes the avenue significant. On this basis parcels W03-W12 and W17 should be removed, as it fails to comply with para 5.8.14 of EN-1 and para 2.53.5 of the draft EN-3.

East Cambridgeshire District Council would also like to draw to the attention of the Examining Authority that the draft EN-3 suggests a Solar Farm of this scale should be typically limited to a lifetime of 25 years while the developer is seeking a 40 year consent without exceptional justification. If the Secretary of State was to approve the application it is requested it is limited to a 25 year lifetime in accordance with emerging national policy.

The Council while not having expertise in battery management or safety would want to see appropriate mitigation measures (secured by the DCO requirements) that ensure that a battery fire does not pose an unnecessary risk to either the public or firefighters; in addition ensuring the environment is protected for instance against water pollution. Given as battery technology is changing at a fast rate this might involve, but not limited to requiring the developer at its expense training the fire services on how to deal with a potential fire. However, the Council will support the comments of the Fire Services and other independents who have expertise in this field.

Again, while the Council does not have expertise in regards to the measuring of the quality of farmland given the great concern raised by the public and those with specialist knowledge, it is requested that an independent survey is undertaken to assess the Agricultural Land Classification and the versatility of this farmland. It is considered this of great importance given the scale of the development.

East Cambridgeshire District Council requests that the Examining Authority provides dedicated time in order to hear and consider those who work within the Newmarket Horse Racing Industry.

The proposed impacts on the wider economy of the local area has not been assessed correctly and on this basis the methodology and assessment of the workforce and its origins presented by the applicant is not sufficient to make an informed decision.

It is requested that the Examining Authority also considers the appropriateness of using Draft Overarching National Policy Statement for Energy. Specific reference here is not made as the draft EN-3, seems to be of direct relevance to what is primarily a solar farm development.

On the basis for the reasons listed above East Cambridgeshire District Council objects to this proposed development.

Yours sincerely

Andrew Phillips
Planning Team Leader