



HOUSE OF COMMONS

LONDON SW1A 0AA

The Planning Inspectorate
Temple Quay House
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8 November 2022

Dear Examining Authority,

Further to our 'Relevant Representation', dated 15 March 2022, we wish to provide further details of our opposition to the proposed solar scheme by Sunnica Ltd. We believe that the project would cause irrevocable harms to our local communities and landscape.

It is important to note that our views about this application are based on its specific issues. Our comments on this application should not be taken to indicate any position more generally on the merits of solar energy. We are both supporters of solar energy as an important means to achieving energy security and a net zero carbon economy for the UK by 2050.

We are most concerned by the following aspects of Sunnica Ltd's Development Consent Order application:

1. The scale of the project
2. The proposed use of 'best-and-most-versatile' agricultural land
3. The proposed use of battery energy storage systems
4. The impacts of construction on our constituents
5. The lack of community engagement by the applicant
6. The quality of decommissioning plans

The scale of the project

At a reported 2,424 acres, the proposed solar farm would become the largest in Europe and multiple times the size of any other existing or planned solar farm in the United Kingdom. Sunnica Ltd' proposed solar farm is poorly designed, impacting at least twelve villages in our constituencies: Isleham, Fordham, Chippenham, Kennett, Snailwell and Burwell in South East Cambridgeshire; and Freckenham, Worlington, West Row, Mildenhall, Red Lodge and Newmarket in West Suffolk. We believe that the design will fundamentally alter the East Anglian countryside landscape and

affect the amenity of the villages involved – such that they feel enclosed by industrial technology.

The proposed use of ‘best-and-most-versatile’ agricultural land

In this year’s British Energy Security Strategy, Ministers stated that they would be: “... encouraging large scale projects to locate on previously developed, or lower value land, where possible, and ensure projects are designed to avoid, mitigate, and where necessary, compensate for the impacts of using greenfield sites[1].”

This is significant because we have been presented evidence, compiled by local residents, which appears to show that the sites selected by Sunnica Ltd are actually graded ‘best-and-most-versatile’. A report undertaken by Patrick Stephenson Ltd, for example, indicated that, based on an 80 hectare survey of six fields neighbouring the Sunnica Solar Farm sites, we can expect approximately 10% of the site to be ‘grade 2’ land, and 68% of the site to be ‘grade 3a’ land[2].

In addition, Bidwells LLP have assessed that, across the Sunnica Energy Farm sites, there is a combined minimum of 195.76ha (483.73ac) ‘best-and-most-versatile’ ‘grade 2’ and ‘grade 3a’ land[3]. Moreover, their ‘Predictive BMV Land Assessment’, suggests that 959.893ha (2371.95ac) of site land has a ‘high likelihood’ of being ‘best-and-most-versatile’ [4].

We also understand from our constituents that the assessment findings put forward by Sunnica Ltd do not correspond with the produce of the land. We are told by farmers in the vicinity that the land in question is a seedbed for quality wheat and root vegetables, which appears to be consistent with BMV land of grade 2 and 3a. On this basis, it is difficult to see how 96% of the site can be “moderate quality” or “poor quality”; especially the latter, which Sunnica Ltd places at 40% of the entire land[5].

Given the obvious divergence between Sunnica Ltd’s analysis and that of our constituents and their expert sources, we would fully expect this to be reviewed at the examination stage by specialists, who we understand can be employed by the Planning Inspectorate for planning and environmental impact assessment.

We also note Cambridgeshire County Council’s analysis of Sunnica Ltd’s land assessment in their Relevant Representation:

“... the capability of the soils to produce high yield crops with the support from irrigation seems to be understated. Grade 3 soils in Cambridgeshire can produce a greater range and yield of crops than Grade 3 soils in other areas of the country albeit using irrigation. Evidence of the yield from this area is needed to inform the assessment of the scheme’s impact on agricultural production in the area[6].”

Finally, we share our constituents’ concern that the assessment presented by the applicant is the only land assessment being mentioned for examination, and that

access to the site to verify the results of a soil survey has not been forthcoming. In fact, we note that Sunnica Ltd admit to communicating to landowners their view that no further assessment is necessary[7]. We struggle to understand this resistance if Sunnica Ltd's land assessment findings are indeed unequivocal.

Battery Energy Storage System

According to Sunnica Ltd, 78 acres over three site compounds will be populated with lithium-ion battery energy storage systems (BESS)[8]. The planned total energy stored in these cells will amount to between 1.4-2.7 kilotons of TNT, which is the equivalent of 92-270% of the energy released in the Beirut warehouse explosion in August 2020[9].

We appreciate our constituents' concern that a project with such major accident potential is being considered so near to residences. According to Sunnica Ltd, some residences would lie just 0.27km from the development[10]. We urge the Examining Authority to seriously consider these safety risks during the examination period.

The impacts of construction on our constituents

According to Sunnica Ltd, approximately 160 heavy goods vehicles and 841 staff will commute to the site daily for six days a week, from 7:00 until 19:00[11]. Residents expect this to cause significant levels of disruption, as they will have to share these roads for their daily journeys, including for work purposes.

There are also fears relating to the durability of the local highways which are not designed for, or used to, such volumes of traffic.

The lack of community engagement

Throughout the application process, we have been disappointed by the regard shown by Sunnica Ltd for our constituents. Most recently, this manifested itself in the applicant's letter dated 21st July 2022 to the Examination Committee, in which Sunnica Ltd called for the examination to commence even though their proposed changes to the scheme were not due to be clarified until 30th August. Assessments relating to noise, traffic, changes to landscape, safety, security, and decommissioning had not been completed.

Just before this, during the period 6th June – 6th July, when there was a consultation on their proposed changes, Sunnica Ltd not hold any consultation in Suffolk, despite two of the affected locations residing in the county. The omission of in-person meetings also occurred last Autumn, when Sunnica Ltd refused to attend an open meeting with residents on 15th October and failed to schedule any alternative in-person sessions despite the relaxation of all legal social restrictions in July.

This issue is compounded by a consistently poor standard of communication. Our

constituents have frequently highlighted to us poor information access, especially for those who struggle with digital technology; low quality webinars; a general unwillingness to provide further details about the scheme; and short notice for deadlines as a result of Sunnica Ltd's changeable agenda.

The quality of decommissioning plans

Finally, we would welcome more information about the economic and environmental effects of the decommissioning phase. At present, we believe Sunnica Ltd have only accounted for these effects during the construction and operation phase.

We would greatly appreciate your thoughtful consideration of all of the above points during the examination period.

Yours sincerely,



Lucy Frazer MP & Matt Hancock MP

References

[1] Gov.uk, [British Energy Security Strategy](#)

[2] Stephenson, P [2021], [Agricultural Land Classification Report - Sunnica Energy Farm.pdf](#), p.9

[3] Bidwells LLP, [Sunnica Energy Farm Proposed Layout.pdf](#)

[4] Bidwells LLP, [Sunnica Energy Farm Proposed Layout - Predictive BMV Land Assessment.pdf](#)

[5] Sunnica Energy Farm, [Environmental Statement](#), Volume 6, p.12.

[6] National Infrastructure Planning, Sunnica Energy Farm, [Cambridgeshire County Council Relevant Representations](#), p.9.

[7] Sunnica Ltd [July 2022], [Access for Land Assessments.pdf](#), p.2

[8] Sunnica Energy Farm, [FAQs](#)

[9] Fordham, E, et al. (2021), [Safety of Grid Scale Lithium-ion Battery Energy Storage Systems](#), p.15

[10] Sunnica Ltd, *Sunnica Energy Farm*, [FAQs](#)

[11] Sunnica Ltd, [Preliminary Environmental Information Report, Chapter 3: Scheme Description](#), p.24