

Sunnica Energy Farm
Interested Party
Relevant Representation Resubmission
Nick Harvey
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My “relevant representation” only appears in summary on your web site, some of the document is missing. Here is a complete current document for you to consider and is submitted before the Deadline 2.

Unique Reference: 20030094

(previous reference number 20029954)

Summary

My representation will concentrate on a number of principles and will exclude National Policy complaints which are a major item of concern. It will cover :-

1. the applicants consultation process -
2. the suitability of the site -
3. the size of the site(s) -
4. the lack of detailed information about items of interest and consistent misleading of the public -
5. the Health and Safety of the site - the lack of any real plan to decommission, recycle, upgrade or maintain the site -
6. the refusal to reconsider the site choice -
7. the need and effectiveness of this type of installation-
8. Conclusion

I also show details of the applicants misuse of the planning system simply for financial gain.

(I notice at the Preliminary Meeting that you placed a high emphasis on parties getting together to resolve problems and issues. I fully support this once “Outline” planning approval has been obtained, however I object to the plan as a whole concept and so getting into the detail should not be needed yet. Indeed the application should be thrown out simply on the site and content of the Power Plant.)

1) The applicants consultation process

The consultation process for NIP (National Infrastructure Projects) is fundamental to the process and seeks to ensure all views are taken into account before a planning application is submitted in order that the project is as well designed as possible to fulfil both the National need and the local situation.

For this project there have been two major issues with the process.

- Firstly the Covid Pandemic stopped the running of proper meetings to discuss the project, the involvement of local interested parties, and two way consultations.
- Secondly the attitude of the applicants towards contributors to the process meant that constructive feedback was talked down, ignored, or “cancelled”, and the refusal to discuss other sites, significant amendments to the plans or many other small but important matters was detrimental to the spirit of the NIP process.

(One significant example of this was that at the online consultation meetings there was no interactive two way session when answers to points made could be examined, challenged or refuted where errors were made.

Another is that no “Executive Summary” of the project explaining the size, scope, consequences and implications was ever produced that clearly set out the implications of such a project.

A third is that big areas of the country such as Mildenhall and Newmarket were never mail-dropped to inform locals about the project)

2) The suitability of the site

The main reason for the choice of this site was the proximity to the Burwell Power station and the 400KV connection to the National Grid. Without this the project was a non starter. It turns out that there were no formal contractual agreements to the plan that the applicant put forward by the National Grid and hence the need for an extended and amended application process.

The UK food security aspects of the effect of the application were never discussed and addressed. There were a few arguments about the grade of agricultural land the project was to use but the truth is that this area is currently used for vegetable and livestock farming and the vast acreage being lost to UK PLC food production will affect our food security.

The choice of middle and southern England for Solar installations has only recently become viable as the technology is advancing rapidly. Indeed it has been admitted by the applicant that the current technology will become outdated in a much shorter timescale than the life of the project. The scale of the project (1,000,000 8 feet x 4 feet panels) will mean that its very unlikely (no provision has been made by the applicant) for these to be upgraded. This in turn means unnecessary acreage is required to make this a cost effective scheme.

The UK land use aspects go hand in hand with food security, for example generating power by nuclear means would need a tiny fraction of the land area of this scheme and provide 24x7 power rather than unreliable power needing batteries to store the peaks in generation.

Large scale battery farms have a poor safety record in as much as when a fire starts in a battery it is almost impossible to extinguish and has to be left to "burn itself out". There is no guarantee that this will ever happen on this site but the scale of the solar arrays need significant battery storage and indeed the size and capacity of the batteries proposed for energy trading on top of those required simply for supply smoothing increases the likelihood and severity of any such event.

This part of the country is high value in terms of food production, horse-racing industry, hi-tech business, suburban and rural living, quality of life etc. Putting an industrial power plant in such an area is unnecessary and foolish when there are brown field sites, industrialised areas, rooftops and other less valuable areas (away from populations that can be adversely affected by accidents and pollution from such an installation).

There is an argument that this is a limited time scheme and that at the end all will be restored to its former use. However this has already been proved to be a lie as the applicant has openly said that underground cables will never be removed, concrete cable chambers will be left (the size if these are not just like a street manhole they are hundreds of meters long and there are many of them) There is no funding for this decommissioning built into the business model as yet and its expected that this will only be addressed 10 years before decommissioning is due. As mentioned earlier the technology will be out of date well before this time, also the demand for electricity is likely to still be present and so rebuilding on an existing site seems very likely to be a good planning reason at that time.

Any plan should have recycling of the technology at its heart and it has been stated by the applicant that the industry is in its infancy and that the capacity is so far not there. It seems that recycling is likely to be “outsourced” to far away countries that had a poor record of effective management of polluting waste.

Traffic in the area will be increased significantly during construction with the latest application requiring exceptional sized vehicles to be on the road and indeed to require special road works and permissions. Even if normal HGV lorries are used for most of the works that are proposed the number of vehicle movements (*average* 4 per hour) combined with the associated road works will bring the traffic in the local area to a standstill for what is now a “phased” approach to construction for many years. After construction there will still be additional traffic on what are simple country lanes and “B” roads.

3) Site size

In order to maximise the profits for this project site size has been maximised. In fact this is one of the largest Solar and Battery installations in Europe. Spain and Africa have significantly higher levels of light and solar installations installed in these areas are exponentially more efficient, this will be inefficient at the start and not upgraded as technology progresses, causing excessive size to benefit comparison.

The site size is comparable to Heathrow airport or both RAF Mildenhall and Thetford Forrest combined. Its enormous 2032 football fields. The equivalent generation from a nuclear, gas fired, coal power station would need, by comparison, an insignificant site area. A surprising large part of the site will be “non productive” but still not available for leisure or farming activities. Suggestions to incorporate leisure facilities such as viewing platform, nature reserves/parkland, dog walking areas etc. have been ignored by the applicant.

In short the size is unacceptable and the local communities will not benefit in any meaningful way from the loss of amenity, nature, environment.

There are already a great number of solar installations in this area but all of these will be dwarfed by the immense size of the proposal.

Soham	Triangle Solar Farm	12 MW	70 acres	Solar
Lackford	Lackford Estate Solar Park	20.9 MW	96 acres	Solar
Fordham	<u>Forest Heath Solar Farm</u>	5.0 MW	25 acres	Solar
Stretham	Strowbridge Solar Farm	72 MW	250 acres	Solar
Six Mile Bottom	Great Wilbraham Solar Farm	28 MW	156 acres	Solar
Lakenheath	Toggam farm	13 MW	30 acres	Solar
Chittering	Radical farm	12 MW	70 acres	Solar
Wilburton	Mingay solar farm	24 MW	121 acres	Solar
Stradishall	Broxted solar - Stradishall airfield	32MW	150 acres	Solar
Newmarket Heath	Heath Road			Solar
Wicken	Goose-hall Solar Farm Under Construction	40 MW	178 acres	Solar
Icklingham	Under construction	8 MW	35 acres	Solar
Ingham	Under construction	14 MW	47acres	Solar
Burwell	Under construction	50 MW	200 acres	Solar
Lackford	Lackford Landfill Scheme	1.2 MW		Gas
Risby	Symonds Farm Power Ltd	1.4 MW		Biomass
Red Lodge	Bay Farm Solar Farm	8.1Mw	35 acres	Solar
Burwell	Goosshall Farm			Solar
	Total	341MW	1463 acres	
SUNNICA		500MW	1077 Acres	Solar/Battery

4) A lack of detailed information about items of interest and consistent misleading of the public -

The lack of information and misleading half truths that have been used by the applicant and their teams of contractors to try and explain away points of contention, debate or error is astounding. Spinning of the information by the applicant seems to be the norm.

Transparency is given lip service only. There are so many examples of this that I hesitate to list any, but sufficient to say that as previously mentioned the simple summary of the scheme deliberately minimises the scope, size, impact and issues with such a scheme, and this proposal in particular. (Nowhere did they communicate that there would be nearly 1,000,000 (8 feet by 4 feet) panels required until I challenged them on these figures) (the scale of substations and associated equipment was published but only by detailed and time consuming analysis of the technical drawings) (the Health and Safety implications are still not clear to me and my questions are given the meanest of answers) etc etc.

5) The Health and Safety of the site - the lack of any real plan to decommission, recycle, upgrade or maintain the site

As mentioned previously a proper risk assessment of all aspects of the proposal has not been forthcoming. A risk assessment should include ALL possible risks together with a likelihood and impact of such risks. Only then can plans be drawn up to manage the risks, mitigate them or eliminate them. When questioned they continually put off these questions until the last possible moment, then have assessed the risks as minimal when they are in fact much greater. These can be for items as simple as traffic accidents, industrial accidents or even battery explosion. In assessing if this proposal should be approved a proper H&S assessment should be produced in detail, with alternatives, including details to minimise the risks.

There is no plan to decommission, recycle, upgrade or maintain the installation. Some aspects have been addressed and the proposer has some experience of low scale solar but nothing on this scale; and they have no detailed experience of battery technologies. As mentioned earlier there is no funding plan for decommissioning, no commitment to restore the site to pristine "as found" and in fact a determination not to address these items whilst the current owners are in place. The current proposers have committed to leave the project as soon as they can sell it on. They have no local interest and are treating this as a business transaction rather than an environmental, land use, food security project.

Upgrading of the technology (batteries and panels) is a key point financially, for efficiency and safety reasons, and for the underlying viability of the project. None of these areas has been effectively addressed.

Recycling of panels and batteries is a new technology not yet fully available, effective, efficient or cost effective. No believable plans have therefore been made available and again spin is used to say that these things will all be sorted out in the future.

Statements made about training of apprentices, staff and skilled jobs are all unbelievable to a qualified and experienced H & S Officer, Apprentice Trainer, Service Manager and Engineering supervisor, such as myself.

6) The refusal to reconsider the site choice

The refusal to reconsider the site choice appears to be driven by the profit motive. I do appreciate that this is a private company and that no such project would be possible without the company making a healthy profit and have no problems with this principle. I do however think that all the proposers eggs were put in this one basket well before the project was public knowledge, far before any public consultations and after considerable investment of monies and personal credibility had taken place. One in this position they must have felt committed to the plan and did not want to lose face by back tracking. Again I feel some empathy for this position but the lack of proper research and consultation at the outset has damaged this proposal. In fact major problems are occurring before any work has started. (Such things as a major landowner pulling out once the proposal was made public, the Grid not being properly contracted etc,)

No one has been opposed to solar power installations but almost everyone has seen that this site is wrong for so many reasons. I have no personal investment as I live away from the proposed site (in Mildenhall) and I am unlikely to be affected directly with anything but traffic chaos.

7) The need and effectiveness of this type of installation

The need and effectiveness of this type of installation has not been established.

The UK has a known undersupply for power which has been exacerbated by the current Ukraine crisis. Solar is seen as a quick and cheap, clean alternative and, to a degree, this is true, however this argument only holds good if the site is well chosen.

Not all power can be supplied by renewable sources due to the cyclical nature of the power generated, therefore other power is necessitated such as nuclear generation and also energy storage systems to balance the supply are essential. Land use and food security are other aspects of such a project that have not been addressed in the proposals and should be considered in any such proposal. Brown field sites have been ruled out by the proposer, roof tops have been excluded as alternatives, energy saving and efficiency has been ignored.

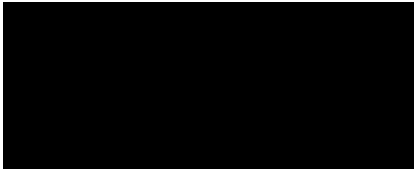
In short there is a need for power generation to meet demand but demand needs to be managed as well as supply and effective sources of power are required. Alternatives to this scheme and others like it need to be examined when looking to grant planning for this scheme - others which would be much better long term solutions.

8) Conclusion

This proposal at first glance is an easy way to get new power generation close to the Grid and reasonable cost in a reasonable time. On starting an examination it begins to look more and more like a proposal to simply make the applicants money and for them to then move off to pastures new than to help the country, environment, locals or our grandchildren.

I repeat, I noticed at the Preliminary Meeting that you placed a high emphasis on parties getting together to resolve problems and issues. I fully support this once "Outline" planning approval has been obtained in principle, however I object to the plan as a whole concept and so getting into the detail should not be needed yet if at all. Indeed the application should be thrown out now² simply on the site and technical content of the Power Plant. proposal

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