

THE REPRESENTATION OF REACH PARISH COUNCIL (IP 20030127)

1. Background

Reach is a small village in East Cambridgeshire. It sits 11 miles northeast of Cambridge and 5 miles east of Newmarket. The most recent estimate from the Office for National Statistics indicates that the parish population in mid-2019 was 329.

Reach is a particularly small neighbourhood covering just 422 hectares (1.75 square miles). However, there are significant areas of national archaeological, historical and environmental interest within its bounds. The village's form strikingly reflects its rich past and its relationship with the landscape. It has remained remarkably unchanged for several centuries. It is defined by an artificial spine, formed by the Devils Dyke, Fair Green, the Hythe and Reach Lode, that runs through the entirety of the neighbourhood and reflects land use going back to at least the Saxon Period. The Devils Dyke is the largest Anglo-Saxon earthworks in the country.

Reach also has a rich natural environment resulting from the chalk upland/fen junction that runs roughly east-west through the parish. Elsewhere, ecologically valuable environments have arisen as a result of human activity- for example the chalk grassland SSSI that has developed on the Devil's Dyke, the chalk cliff faces of Reach's clunch pits and in and around the borrow pits of Tubney Fen and Hurdle Hall.

In terms of built environment, Reach is a compact settlement lying on the fen edge. Virtually all the housing in the village has been built on low-lying chalk abutting the fen soils between 3 and 10 metres above sea level. Although limited in elevation, the choice of site was important in flood mitigation and shapes Reach's gentle visual presence in the landscape. The majority of houses in the village have outlooks onto the surrounding fen.

In summary, Reach is a peaceful, small, discrete and attractive village set in landscape of significant character and a long history. The Devils Dyke, both a Site of Special Scientific Interest(SSSI) and a Scheduled Monument, runs through the village. The National Trust already owns significant areas of land within Reach's neighbourhood and, through its Wicken Vision programme, aspires to acquire more for conservation and recreation benefit.

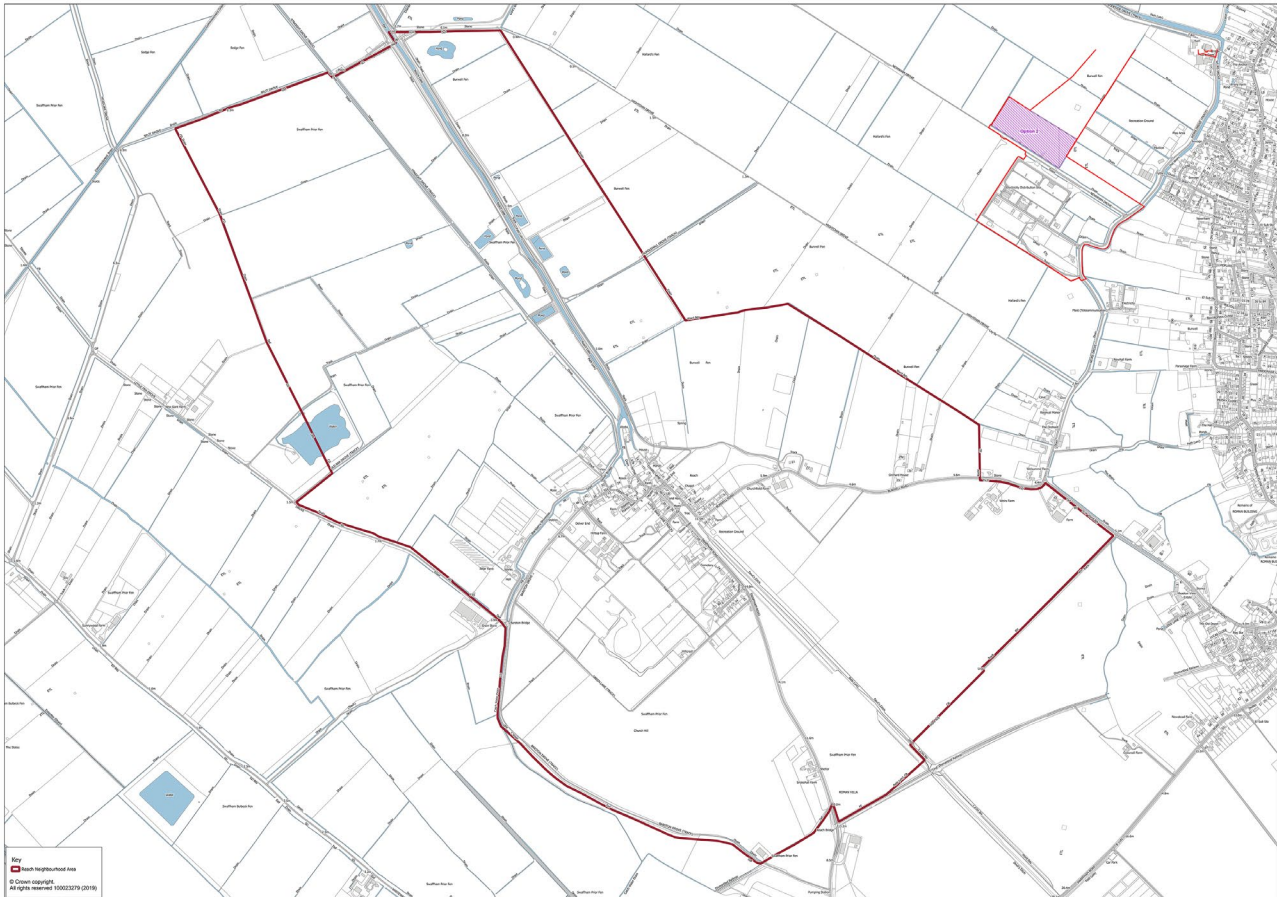


Location of Reach. *The red line marks the Parish Boundary. The areas of green represent significant areas of recreation or conservation value including land owned by the National Trust.*

This representation focuses on the impact on Reach of Sunnica's 'Option 2' proposal but also comments on the entire Sunnica scheme.

2. Sunnica's Option 2 Site

Sunnica's proposed Option 2 site, for transformers and associated infrastructure required to enable electricity from its scheme to be taken into the National Grid, lies on Burwell Fen, one mile from the centre of Reach and a similar distance from the Devil's Dyke SSSI. The site is within the National Trust's Wicken Vision area (<https://www.nationaltrust.org.uk/wicken-fen-nature-reserve/features/wicken-fen-vision>) and in close proximity to land already owned by the National Trust.



The Village and Parish of Reach in relation to Sunnica's Option 2 site

Sunnica's proposal would require significant expansion of the substation at Weirs Drove. We calculate that the land required (43m by 76m) would represent a 20 percent increase in the footprint of the substation. In the flat and largely hedge and tree-free landscape of Burwell Fen, the vertical dimension of the proposal - the transformers installed on the site would be up to 12m in height - would have profound impact. In the round, the proposal would create a sizeable, visually intrusive presence in our landscape and would greatly contribute to the increasingly urbanised or industrialised feel of the south east end of Burwell Fen and the Weirs Drove area. The site would be particularly visible from the north east end of Devil's Dyke SSSI, from Burwell Road which is a main gateway to the village of Reach, from the banks of Reach Lode and from the footpaths of Wicken Vision land. These are all key recreational routes for villagers.

Work to construct the site would require significant HGV traffic, some of it of exceptional size.

3. Reach PC's assessment of Sunnica's Option 2 Proposal

Sunnica's proposed scheme has generated concern in Reach. However, the views of residents of Reach to Sunnica's application will, to a great extent, be determined by where Sunnica finally proposes to locate the transformers and associated infrastructure to enable electricity from its scheme to be taken in to the National Grid. We believe that a decision to proceed with Option 2 installation of transformers on land adjacent to Weir's Drove substation would attract unhappiness and strong opposition in the village. We base this assessment on the following:

a. A residents' survey undertaken in February 2020 in support of Reach's draft Neighbourhood Plan. Every household was invited to participate and 146 responses were received. This is a significantly high response for exercises of this kind and we judge that the results received are representative of general opinion within the village. The messages from the survey germane to Sunnica's application are:

- Villagers attach importance to views approaching and leaving Reach (over 90 percent of respondents)
- Villagers place great value recreational value on the land surrounding the village (over 97 percent of respondents)
- The protection of natural features, important views and paths and droves is very important to most residents (over 90 per cent of respondents).
- Most respondents agreed that it is important to minimise the impact of development on Reach's historic environment and archaeological sites (over 90 percent of respondents).

b. A landscape appraisal of Reach's neighbourhood area prepared by Alison Farmer Associates (AFA) in May 2020 in support of the draft Neighbourhood Plan (attached). The appraisal identified the importance of the gaps between the village and Burwell and Swaffham Prior and the need to limit erosion of these. (This was also a concern to 88 percent of respondents in the above mentioned residents' survey). In recent years, piecemeal developments have reduced what was once an almost entirely open landscape between Reach and Burwell. A 90 home park-home site, a battery storage facility and an 80 hectare solar farm and associated infrastructure (all close to Sunnica's Option 2 site) are notable examples of this erosion. The AFA appraisal concluded that, unchecked, further development would erode the feeling of separation between the villages. The appraisal acknowledged the deleterious impact on the landscape of the neighbourhood of Reach of the Weirs Drove substation

in its current form and recommended that the village sought opportunities to reduce the visual effects of pylons and of substation through appropriately located woodland planting and linear lines of trees.

Notwithstanding the above mentioned developments, Reach PC considers that the Option 2, through the introduction of a substantial body of visually intrusive industrial infrastructure, fencing, lighting and cameras onto open, hedge and tree-free arable land, would:

- significantly and irrevocably damage the character of Burwell Fen, an important constituent of the Fens landscape (NCA 46), defined in East Cambridgeshire's Local Plan 2015 as "large open, flat and low-lying fields under wide skies, crossed by numerous waterways and drainage channels". We judge that the cumulative impact of the above mentioned developments has removed any capacity of the landscape of Burwell Fen to absorb further large development. Screening through the planting of trees would not obscure the proposed development for many years, if ever, and would itself have a detrimental impact, fundamentally altering a previously open and flat landscape. The proposed development would be an unavoidable visual presence across the entirety of Burwell Fen and particularly from key recreational routes on the banks of Reach and Burwell Lodes and the Devil's Dyke, which run 3 metres or more above Burwell Fen. Accordingly the proposal would have a significant adverse effect on the recreational use of these areas and Burwell Fen itself by many residents of Reach and other local communities who walk, cycle, ride and bird watch there. The area would cease to be perceived as rural and open. The proposed development would be visible from significant tracts of Wicken Vision land owned by the National Trust and would diminish the sense of space and wilderness that the Trust is endeavouring to build in this area.
- erode the zone of separation between Reach and Burwell, thereby removing the distinctiveness of both communities. The fact that the proposed development sites would be visible on long stretches of the only road connecting the two settlements would make this very and regularly obvious to all residents of Reach.

Policy Considerations

Reach Parish Council considers that the Option2 proposal contravenes the following planning policies:

The Planning Act 2008 and National Policy Statements for energy infrastructure (2011) Overarching Policy (EN-1)

Criteria for Good Design

4.5.3

Whilst the applicant may not have any or very limited choice in the physical appearance of some energy infrastructure, there may be opportunities for the applicant to demonstrate good design in terms of siting relative to existing landscape character, landform and vegetation. Furthermore, the design and sensitive use of materials in any associated development such as electricity substations will assist in ensuring that such development contributes to the quality of the area.

We do not believe that the applicant has demonstrated good design in respect of Option 2

Landscape Impact

5.9.8

...Projects need to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate.

We see no evidence of design associated with Option 2 to minimise harm to the landscape

5.10.8

Applicants should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5) except where this would be inconsistent with other sustainability considerations...

The land for the proposed Option 2 site is grade 2. We have seen no justification from Sunnica for removing this productive agricultural land from the system. A number of Reach villagers have recently expressed concern at the loss, locally, of good agricultural land and its impact on UK food security.

ECDC Local Plan 2015

Policy ENV 1 refers to Landscape and Settlement Character and *requires that development should be informed by and respect the distinctive character area within East Cambridgeshire as defined in the Cambridgeshire Landscape Guidelines, 1991. ENV1 goes on to state that development proposals should demonstrate how they will create positive and complementary relationships with existing development and how they will protect, conserve and, where possible, enhance the pattern of historic and traditional landscape fea-*

tures, such as watercourses, characteristic vegetation, individual and woodland trees, field patterns, hedgerows key views, unspoilt nature and tranquility of the area, public amenity and access.

Policy ENV 6 sets out the criteria against which renewable energy proposals will be assessed. It supports proposals for renewable energy and associated infrastructure, *unless the wider benefits would be outweighed by significant adverse effects on the local environment and landscape, key views...*

We do not believe that Sunnica has met the requirements of ENV1 and ENV6 of the ECDC Local Plan and in particular the criteria emphasised in italics.

The draft Reach Neighbourhood Plan

The Reach Neighbourhood Plan (NP) is yet to be approved by village referendum and 'made'. Furthermore, the Option 2 site lies just outside the Parish and Neighbourhood of Reach. Nonetheless we think it worth drawing attention to elements of two policies contained in the draft NP which reflect the sentiments of our residents which we judge extend across all of Burwell Fen and thus beyond our parish/neighbourhood boundary.

Policy RCH1 Spatial Strategy

Proposals for development outside the (Reach) Development Envelope will only be permitted where it is essential for the operation of utilities infrastructure and where it can be satisfactorily demonstrated that there is an identified local need for the proposal ...and it would not have an unacceptable impact on the character of the landscape or give rise to an unacceptable increase in vehicle movements.

Policy RCH6 - Landscape Quality

To conserve the essential landscape, heritage and rural character of the draft Neighbourhood Plan Area, development proposals shall, where appropriate, demonstrate how they:

- have regard to, and conserve or enhance, the rural character and the setting of the village as identified in the Reach Landscape Appraisal;*
- would not result in the erosion of settlement gaps*
- ensure that there is no detrimental impact on the key features of important views identified on the Policies Map and described in the Appraisal of Important Views; and*

- *have regard to the Landscape Appraisal Development Guidelines, identified the draft Neighbourhood Plan.*

We do not believe that Sunnica complies with policies RCH1 and RCH6 of the draft Reach Neighbourhood Plan

Reach PC therefore opposes the Option 2 element of Sunnica's application in its entirety.

4. Reach PC's assessment of the entire Sunnica application

Reach PC supports the principle of green energy generation but is unconvinced of the claimed environmental benefits of Sunnica's application. Reach PC has concerns that the scheme is not as sustainable as it claims, being too focused on electricity storage and trading rather than green electricity generation. We are aware that Cranfield University has written a paper on the Sunnica application. Cranfield concludes Sunnica has overestimated the output of the scheme and as a consequence Sunnica will create more carbon than it saves during its lifetime. The failure to meet this key criterion undermines the justification of a scheme that will disrupt many lives and communities.

Reach PC also believes that the battery technology Sunnica proposes to use to store electricity carries a significant fire risk which poses a threat to public health and the environment. In particular we have reservations about Sunnica's modelling of the impact of a fire in one of its battery storage units and consider that it has adopted benign assumptions about how any such fire would progress including the temperature of the fire, the number of batteries caught in the fire and extent of spread between battery stacks, about wind direction and strength and the ability of combustion gases to vent from a container. Accordingly, we suspect that the true risk of a fire becoming a conflagration is not captured in Sunnica's assessments and assurance. We believe that the likelihood of a major incident with a legacy of longterm environmental and public health damage is significantly under-estimated. In certain circum-

Reach PC therefore cannot support Sunnica's application in its current form.

stances this damage could extend to Reach.

REACH PARISH COUNCIL

9 November 2022