



Date 11 November 2022

This Written Representation is in response to the application by Sunnica Limited for an order granting development consent for the Sunnica Energy Farm.

Executive Summary

Introduction

To explain the nature of a tightly knit community with roots deeply embedded in agriculture and an ancient history.

Impact

This will show our concerns for our environment, the oppressive nature of this scheme on the well-being of all.

Landscape

Either born and bred or by choice this village and its neighbours enjoy the open east anglian landscape. This is now under threat and for the older inhabitants lost for their remaining lifetime.

Traffic concerns

These are numerous, our small country roads are suitable for agricultural vehicles and local traffic.

Footpaths and Bridleways

These are of significant value to the community on every level, recreation, exercise and connecting the other

Villages these also are under threat.

BESS

The research to date would give us all great concern, being in such close proximity.

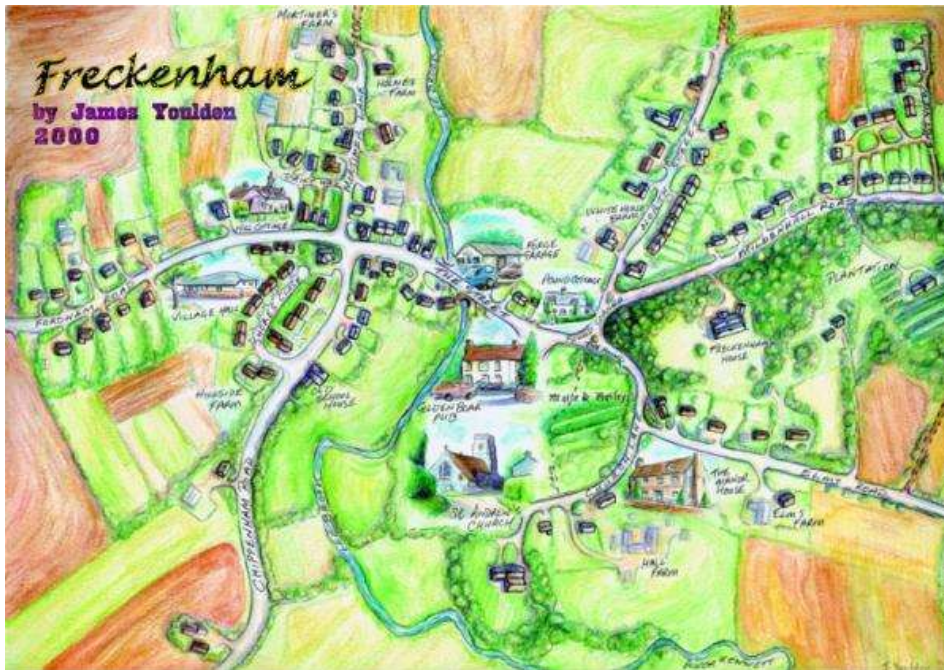
Local Business

Although a suggested 2 years, it takes very little time to severely impact this.

Noise pollution

Conclusion

The sheer magnitude of this application would change life as it has been lived in these communities for ever and would devastate a traditional way of life.



Introduction

The parish of Freckenham occupies an area of over 2,500 acres that sits North East of Newmarket and Chippenham. It has been inhabited since Neolithic times and has a rich history. A hoard of gold coins from AD20 suggest it was within the territory of the Iceni tribe and the Mildenhall treasure trove only a few miles away. The contemporary village itself is new in the sense that the Medieval heart of the settlement of church, manor house and rectory cluster above the village on a spur from Elms Road. This is protected by the remains motte and bailey castle (Scheduled Monument FRK007), possibly erected on earthworks on an older fortification on an escarpment over looking the river valley. Some idea of how the land might have looked before the Fens were drained occurs when the river Kennett (Lee Brook) floods, as it does most years after heavy rains. The draining of the Fens in the late 17th Century meant the village folk turned their attention to farming and the primary industry has been arable farming in the centuries since.

The village developed in the shape of a loose Cross of Lorraine: two crossroads linked by one long street: the B1102 Fordham to Mildenhall road is bisected by the Chippenham Road and Mortimer Lane, which fades into PRoW W-257/002/0 and Bridleway W-257/002/X exiting onto Beck Road at Beck Bridge; the other runs from the A11 along Elms Road crossing The Street at Pound Corner into North Street where it disappears into a farm track, once also a footpath to Beck Road until closed by the landowner. Our limited road network makes the population vulnerable during road closures.

Freckenham is an agricultural parish with four working farms, a stud farm, and a boarding kennels/cattery. It has no industry or commerce although some people undoubtedly work from home especially since Covid. We are a small parish of around 361 inhabitants split into age groups: 58 (16.1%) 0-15 years; 216 (59.8%) 16-64 years; and 87 (24.1%) 65 plus [2020 figures, SODA, The Suffolk Office of Data Analytics], which has remained largely constant since 1801. Although the village size hasn't changed facilities have diminished: in recent years we have lost our post office-shop, one of the pubs and a garage:



remaining facilities are the Golden Boar pub, Village Hall, and St Andrews church.



Despite the lack of facilities, ours is a lively community centred around the Golden Boar and Village Hall, the latter hosting numerous classes and events, including live theatre productions and film nights, plus a popular monthly Farmers' Market which attracts people from the wider area. Freckenham has always been a close-knit community with excellent community spirit, an attractive place to live, even becoming, in estate agent jargon, a 'desirable' place to live, presumably because main centres of employment like Newmarket, Bury St Edmunds, Cambridge, Ipswich, and London are within reasonable commuting distance. Extensive new development or infill building has not been an issue here, and our Neighbourhood Plan seeks to maintain this.

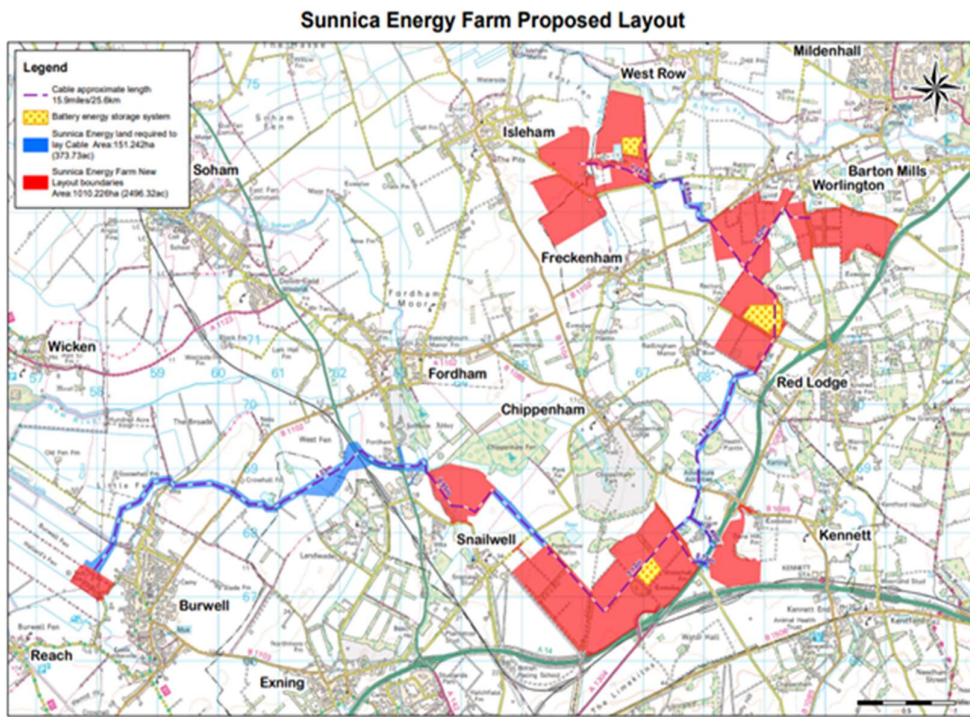


The only provisions available in the village are eggs and potatoes from two roadside stalls, plus seasonably grown asparagus. The nearest food shops are the Coop stores at Fordham (4.71km from Pound Corner) and Isleham (3.34km), La Hogue farm shop at Chippenham (4.29km), and the post office at Red Lodge (4.27km). For main facilities and health care the nearest towns are Mildenhall (5.28km) and Newmarket (13km). The nearest schools are at Red Lodge, West Row, Isleham, Fordham, Mildenhall. There is one bus service a day so residents without their own transport are either dependant on neighbours, taxis or on home deliveries. As a working community with a high proportion of school age children it is essential our road networks remain clear. Because of the limited facilities in the village, Freckenham residents are regular patrons of the local shops, takeaways, post offices, and amenities in our neighbouring villages. If you want a Chinese takeaway, the closest places to go would be Isleham or Fordham. If you want fish and chips, residents may go to Fordham. For Indian takeaway, Mildenhall, Fordham, Red Lodge can all accommodate. This sharing of facilities between villages creates a broader sense of community, which is key to our well-

being. The freedom of being able to simply walk or cycle or drive to the next village, or the village beyond is something we rely on and often take for granted. Residents help each other by doing food shopping or collecting prescriptions or other items for others in the village who may not be able to get out. The fact that residents have always had to travel around the area to access broader facilities forces residents here to forge strong links with our neighbours in the surrounding villages and build up a wider network of friends than they might otherwise do if living in an isolated town or village with lots of amenities.

Families move between the villages in this area for various reasons – change of school or workplace, to be closer to a family member or friend nearby, sometimes for a change of scene. Occasionally they move back again. The result of all of this is that we are a close-knit community, that looks out for each other, but which is outward looking and with strong connections to the surrounding area and surrounding communities. We are proud of our local heritage, we value the area we live in.

Impact of Sunnica on our community



As shown in the Sunnica Energy Farm proposed layout, Freckenham will be surrounded by the Scheme on 3 sides. If you look at the above map and imagine a clock with Freckenham just above the centre, there is only 1 small gap between 9 o’ clock and 11 o’clock that would remain unaffected by the Sunnica scheme, leaving just one ‘escape route’ in the direction of Fordham. Pound Corner (junction of Elms Road and The Street) is less than 1.85km south of East Site A battery energy storage system (BESS) and substation compound (yellow areas on the above map), and 1.75km west of the East Site B boundary. The vast East Site B BESS and substation compound is only 2.5km south-west of the village [distances from Grid Reference Finder]. The wrap-around design and the close proximity of the Sunnica scheme will be highly intimidating – Our treasured rural views will be overlaid by hectares of glass panels, security fencing, huge battery compounds (31 ha in total) and 3 substantial 10 m high substations. There will be no escape, visually or physically, from this alien

industrial landscape and this feeling of entrapment is not something that residents here are used to or wish to get used to. We rely on open access, both visual and physical, to avoid feeling isolated and for our health and well-being.

Visual and Landscape Concerns

The visual impact of the Sunnica scheme cannot be understated. Several years of construction on 3 sides of the village, several years of being surrounded by large scale building sites. Post construction, we would be left with a stark change of grey sterile fields, with their natural living content removed, and security fencing, cameras, solar panels, inverters, BESS containers, weather stations put in their place. By Sunnica's own admission, their planned screening will take at least 15 years to reach maturity (if successful) but without appreciating that the screening itself will destroy our traditional open fen edge and Breckland landscape, adding yet another alien element. Not to mention there are some areas of the scheme that simply cannot be screened due to their elevation such as the Limekilns next to West A and some areas around the East A site closest to our neighbours in Isleham. Although these are not directly in Freckenham, residents here would be affected by them as they travel through the wider community of villages and towns.

The design is visually unacceptable, underestimates impacts, and omits detail on important infrastructure areas such as battery compounds so that its potential effects are impossible to calculate. The Scheme will industrialise our tranquil rural landscape for decades to come, possibly permanently – despite Sunnica's description of the Scheme as being 'temporary', 40+ years is more than 2 generations. For 'older' residents, (anyone over fifty), it will be a lifetime. Some of our families are indigenous, their families have been here for generations. It is unfair to foist an industrial landscape on anyone who chooses to live in the countryside, and doubly so for those of us who were born here.

Traffic Concerns

The ease of being able to move around the wider area will be gone during the Sunnica construction period and Freckenham PC believes that the wellbeing of residents will suffer as a result, since this has always been an integral part of living in Freckenham.



Fig. 1 View of B1102 from North Street showing (R to L) Pound Corner – junction of Elms Road with The Street leading into Mildenhall Road. The deep pit of the Old Marl Pit opposite.

We are deeply concerned about the disruption 2-3 years of construction will create. Our country roads, some little more than lanes, were not designed to take the increase in daily traffic numbers including HGVs anticipated by Sunnica (see photos below). Nor the passage of 450 ton to 1000 ton cranes, or the undisclosed weight of the AIL. Damage to roads and verges is a strong probability and it is unclear who would foot the bill for repairs. This should certainly not fall to the parishioners here.



Fig. 2 Elms Road to Pound Corner, left into The Street, right to Mildenhall Road

As described above, there are only four roads in and out of the village, each of which to a greater or lesser extent will be impacted by this sprawling Scheme. Our main access to the A11 along Elms Road will be through acres of solar panels on one side and beside the vast BESS compound and substation on the other. The experience of travelling along this main route will be one of misery and oppression and a stark contrast to the lovely countryside experience that we are currently used to. The B1102 to Mildenhall will also be impacted with closures and fields of solar along the southern border. Claims that road closures will be for 3 weeks are optimistic given the size and scale of the scheme. It is unclear whether Sunnica have accounted for any adverse events that may prolong this. At any rate, 3 weeks would feel like a very long time for Freckenham residents given the few routes in and out of the village. The inconvenience described by rail travellers in recent 1 day strike actions was impactful, 3 weeks of disruption and people all but trapped in their village, trying to get to work or school or just to the shop would feel considerably longer.

Post construction this route would be in full view of the industrial BESS compounds and substations at East Site A, and the expansive fields of solar. This would be highly visible given the elevation and openness of this fen edge landscape. Similarly, the road to Newmarket both through Chippenham or via the A11 will either be through or beside the Scheme. It may just be possible to escape its oppressive views towards Fordham although elements will be visible from the elevated Fordham Road.



Fig. 3 View from Church Lane corner – demonstrating why Elms Road is unsuitable for HGVs



Fig. 4 View into Church Lane, vehicles habitually use full width of road to negotiate this tight corner

Road closures in this area cause chaos because of the limited alternative routes, unsuitability of the roads for some forms of transport, etc. In the first half of 2019, the UK Power Networks Burwell to Lakenheath Area Electricity Reinforcement Scheme involved laying underground cables through the centre of Freckenham village to carry high powered cables to USAAF Lakenheath, necessitating staggered closure of sections of the B1102. Although each section was closed for only a few days at a time, rather than weeks, and was reasonably well organised, it still resulted in delays, long diversions and considerable inconvenience with extra travelling time and expense. Journeys to Mildenhall were diverted down Elms Road onto the A11, or towards Isleham onto Beck Road, or even through Fordham. This is a significant detour – being forced to drive west to go east. Some inhabitants were virtually imprisoned here because the bus service stopped and taxis refused to accept fares. Given the lack of shops in the village, this is even more challenging because residents here simply have to go out to get provisions.

If the Sunnica Scheme goes ahead the chaos will be far more extensive, especially if construction is attempted in two years which is likely to involve simultaneous or consecutive closures throughout

the Scheme. This will result in huge stress for residents attempting to maintain as normal a life as possible while making allowance for extra travelling time and higher fuel costs.

Footpath and Bridleway Concerns

Residents have expressed concerns over access to footpaths, bridleways and open spaces. Being able to walk/ exercise in quiet, familiar places was vital to our physical and mental health during the dark days of Covid and remains so today. Despite living in the country there are few public open spaces as this is a working landscape. The parish has only four footpaths worthy of that name, the rest are practical shortcuts to get from A to B, like the very short path from The Street to the church, with a handy stile from the Golden Boar.

Freckenham PC is particularly concerned about the following routes:

Mortimer Lane, Isleham - Freckenham W-257/002/0 & W-257/002/X

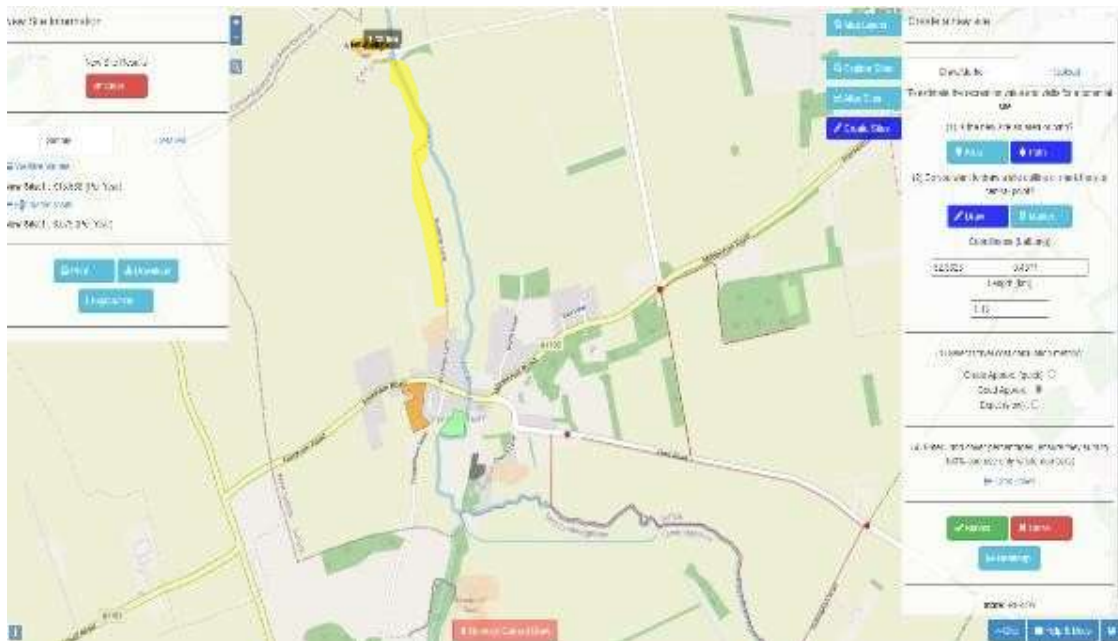


Fig. 5 Orval image of Mortimers Lane, highlighted yellow, footpath W-257/002/0 & bridleway bordering the Lee Brook W-257/002/X. [Footpath numbers taken from the Sunnica DCO documentation]

Mortimer Lane is not currently recorded on ORVal, Outdoor Recreation Valuation, a planning tool that was created by the Land, Environment, Economics and Policy (LEEP) Institute at the University of Exeter. However, their ‘Create Sites’ Tool enables it to be included.

The lane consists of footpath W-257/002/0 and bridleway W-257/002/X. The combined length is a modest 1.03km. Orval estimates its Welfare Value at £13,668 per year and 6,079 visitors per year. It is a well-used route for general exercise and recreation, horse riders and a through route linking residents of Isleham and Freckenham. The Isleham Joggers group regularly use it.

In June 2022 the Say No to Sunnica community group set up a trail camera along this lane over a 46 hour period, which recorded 29 visitors. These included dog walkers and casual joggers. This figure is roughly in line with the ORVal report.

Freckenham resident Nikki Lushington exercises her horse in the lane and surrounding areas on a daily basis. She can name around 20 horse rider friends and acquaintances who also use the lane as part of their regular route and as a link with surrounding areas. See Riders Map below.

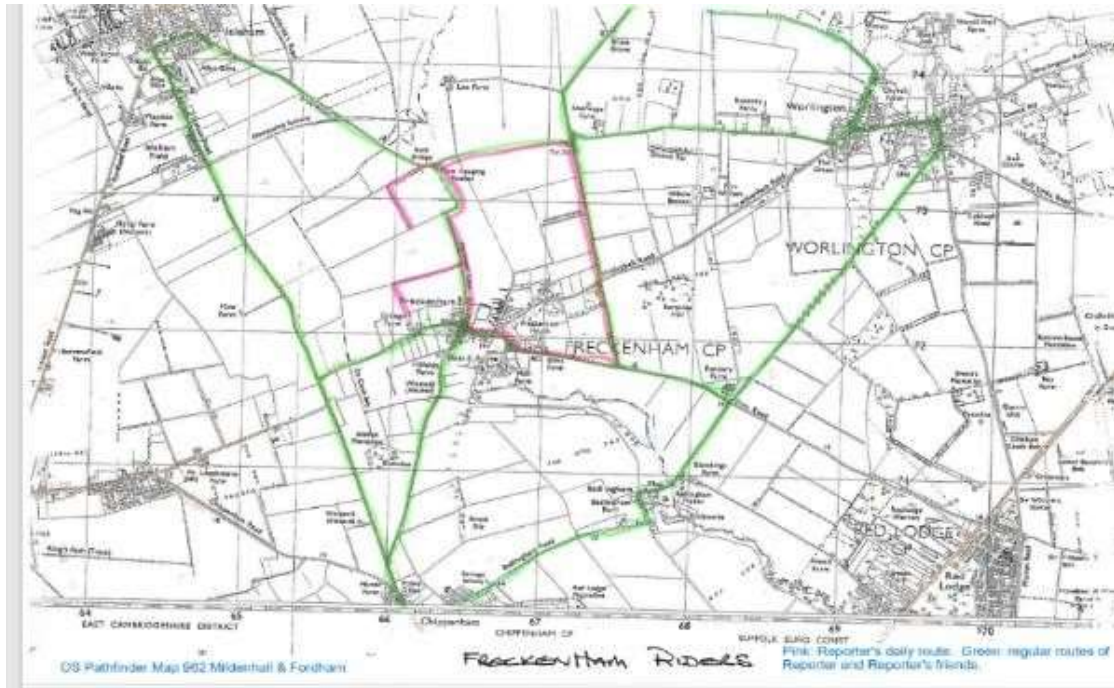


Fig. 6 Riders' Routes, Mortimer Lane and surrounding areas. Pink highlight = reporter's regular usage; Green highlight = regular routes of c.20 other riders.

Mortimer Lane is also used by children to access the Lee Brook chalk stream, for 'pond' dipping or other fun by the water. Children from Isleham and Freckenham meet up here. At least one pupil of Isleham Primary School who lives in Freckenham uses this route to get to school.

Freckenham residents born in Isleham use Mortimer Lane to visit their families. Mrs Brenda Knowles said she often used it when her children were young as a good way to combine pleasurable outings with healthy exercise, and it was important during Covid lockdowns as it enabled her to maintain contact with her sister, when they would meet at the half-way point at Lee (Beck) Bridge. Another indigenous Isleham couple, now living on the Fordham Road, use Mortimer Lane to visit family.

Closing a third of this comparatively short lane, even for the optimistic 'few weeks', will severely impact users especially those using it as a through route to Isleham. Noise and pollution from planned works may discourage people from using any part of the lane for leisure activities – especially those with horses. Thus people's health and well-being, and even household budgets will suffer. Being able to walk to one's destination rather than taking the car has multiple benefits, not least in times of high fuel costs.



Fig. 7 Bridleway section of Mortimer’s Lane, W-257/002/X due for ‘temporary’ closure

The bridleway section follows the Lee Brook, at left of picture; the footpath section W257/002/0 goes through the line of trees crossing the horizon, long views to the top of Freckenham church just visible in the distance. This section, which would also be closed, shows the field of nearly ripe wheat destined to be soil stripped to be laid down to acid grassland as EC02 [see Fig. 7]. It is worth noting that this field and the one adjacent has been constantly under crop for the last three years, a three course rotation of wheat, potatoes and sugar beet. It has been highly productive and perhaps due to its favourable position is harvested several weeks before another farm whose land is closer to the village.

U6006 (The Icknield Way, Badlingham Lane, Green Lane)

Badlingham Lane runs diagonally between Freckenham and Worlington, it is not numbered as a PROW as it was officially designated as U6006, an unmade-up road, in the 1950s. Like many old paths it is known by more than one name; Sunnica has chosen to call it Badlingham Lane and we have done the same to avoid confusion.

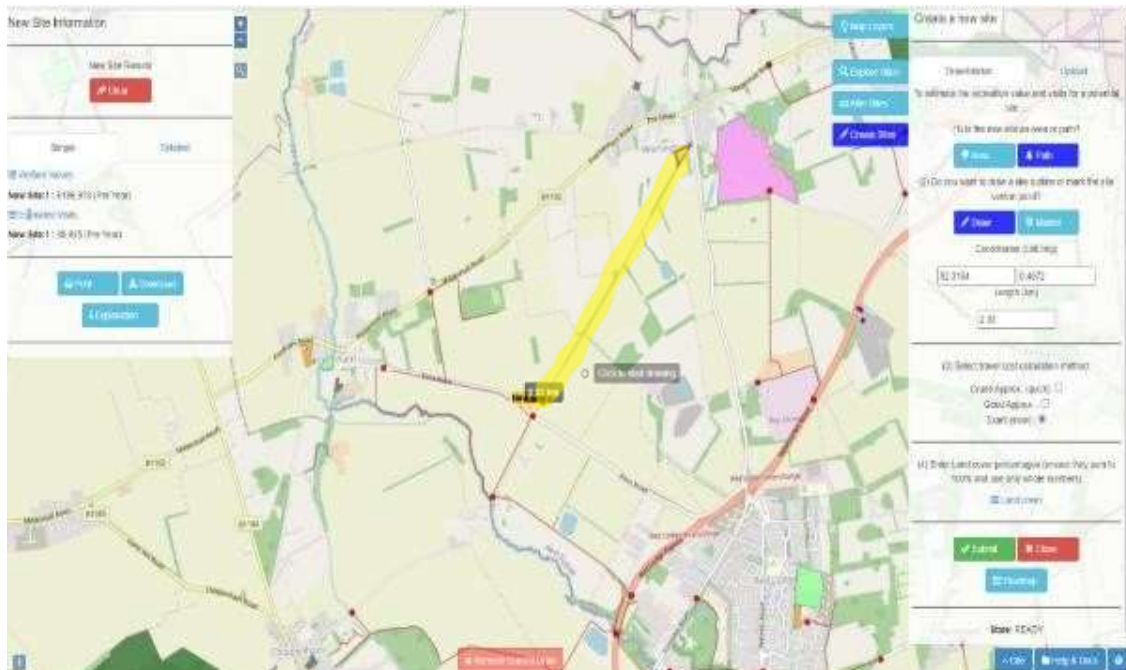


Fig. 8 ORVal Create Sites Tool - Badlingham Lane highlighted yellow. Length 2.33 km. Common Right of Way (CROW) area at Worlington entrance outlined in purple.

The ORVal ‘Create Sites’ facility gives an estimated welfare value of £186,978 and estimated annual visitor usage of 38,925. Annual usage is not unfeasible as Badlingham Lane is popular with walkers, dog walkers, horse-riders, joggers, cyclists, and the occasional motor cyclist, including those using nearby Wild Tracks. It draws users from a wide area as it is open to wheeled traffic (although unsuitable for HGVs, heavy or sustained traffic) and by its proximity to a number of communities. Users encountered during recreational walks typically come from Freckenham, Worlington, Badlingham, Chippenham, Red Lodge, Lakenheath and Icklingham, demonstrating Badlingham Lane is used not only for immediate recreational purposes but as a means of getting from A to B. The same cyclists and motorcyclists are regularly met in the Lane and at nearby Cavenham Heath confirming it is part of a longer circular route.

A brief headcount survey taken at the Worlington entrance (limited parking) of Badlingham over two hours one Sunday lunchtime in July 2022 recorded 21 users, mostly dog walkers plus a couple of cyclists. It is possible to meet no-one, however, especially if walks are timed for early mornings, to enjoy its peace, tranquillity, and abundant wildlife. This was a particular solace during the recent pandemic, when green spaces were acknowledged by the government and the medical profession to be beneficial - if not crucial - to maintain physical and mental health. Simon Bullock, a long distance lorry driver from Chippenham, said that he can’t wait to get on his bike immediately he gets off shift, as it is the only thing keeping him sane and healthy.



Fig. 9 SEF_ES_6.3_Figure 2-2 Sunnica East Constraints. County Wildlife Site ringed pink.

Badlingham Land is a remnant of the diminishing Breckland landscape. Its scenery is varied, transitioning from cultivated fields to wide open spaces and long views typical of Breckland, through enclosed woodland bordered by Scots Pines, into open heathland, to the lush verdancy of mature broadleaves and wide hedgerows of the designated County Wildlife Site at the Worlington end [Fig. 5]. There is also an area of open access under the Countryside & Rights of Way Act 2000 (CROW) at the Worlington entrance, approximating the site of the now dismantled railway [Fig. 8

coloured purple]. For a comparatively short lane of only 2.33km it is extraordinarily varied and full of interest.

Its rich flora and fauna reflect this varied landscape, including heathland and hedgerow plants, deer, bats, insects, and butterflies. It is important for nesting and migrating birds, including red listed Stone Curlews and Lapwings, Amber Listed Tawny Owls, Shelducks, and Greylag Geese; the several species of raptors seen along the lane, including Kites, Buzzards and Kestrels, are testament to this abundant wildlife. Worlington resident Donald MacBean in his Relevant Representation of 29 January 2022 said he'd counted 43 species of birds at the Worlington end.



Fig. 10 Badlingham Lane at Freckenham, facing south-east. Hedgerow across centre borders Elms Road.

This tranquil agricultural scene, with fields constantly under crop, will be unrecognisable covered in solar panels [E16] with the massive industrial BESS compound beyond indicated by the red dot [E17 & E18]. Proposed woodland infilling will take more than five years to have any real affect on screening.

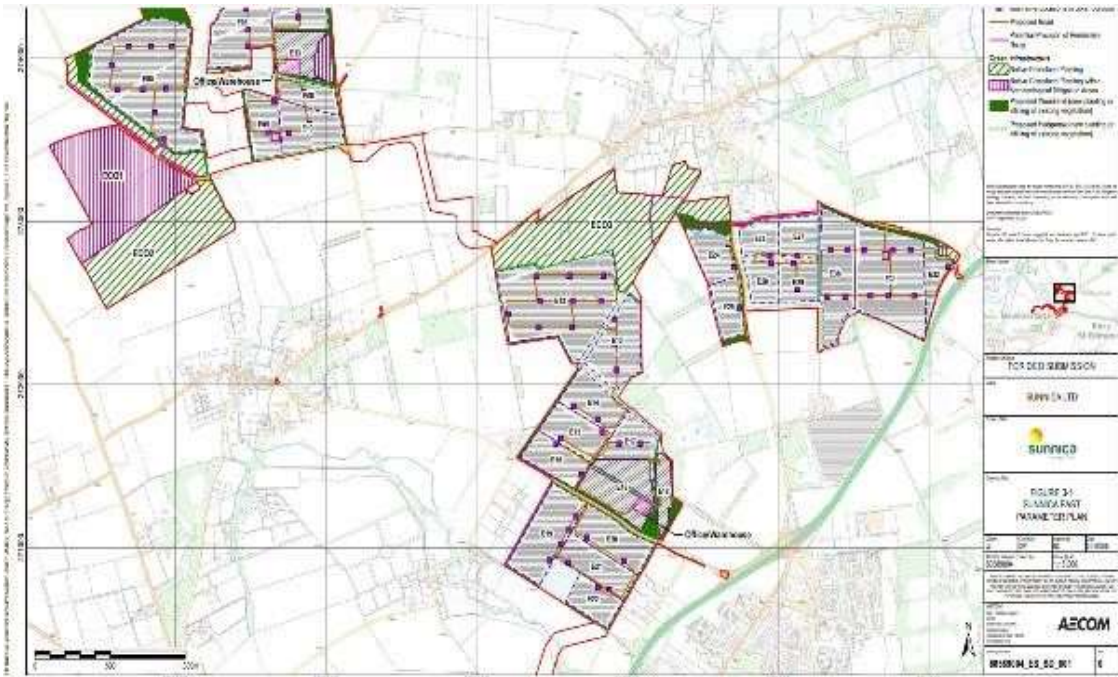


Figure 11 [EN010106-001890-SEF_ES_6.3 Figure 3-1 Sunnica East Parameter Plan \(1\).pdf](#)

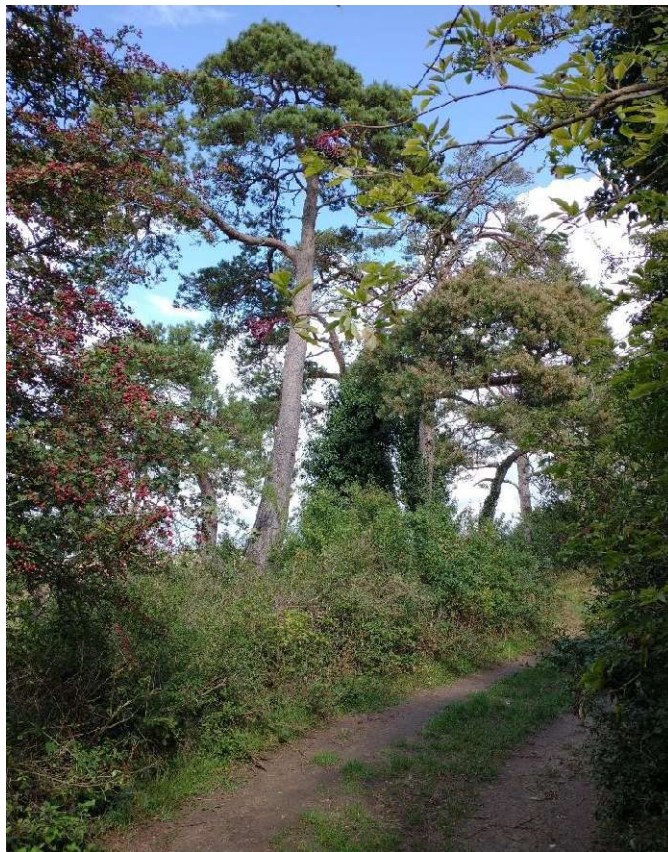


Fig. 12 Badlingham Lane, beginning of woodland section travelling N.E. Prominent Scots Pine may be parish an historic boundary marker.



Fig. 13 View N.E. of typical Breckland pines and sandy soil



Fig. 14 View S.W. adjacent to the heath EC03. Beyond the pine belt the path runs between solar fields E12 & E13 enclosed by 2m high security fencing. No screening is planned.



Fig. 14 Broadleaves and wide hedgerows towards Worlington

A bat survey of Badlingham Lane under the guidance of Arthur Rivett of the Suffolk Bat Group in August 2021 identified at least seven species of bats including Serotines, Leislars, and the nationally rare Barbastelle bat. According to Natural England some of these species are at imminent risk of extinction (A Review of the Population and Conservation Status of British Mammals - JP025 (naturalengland.org.uk)). The survey report noted that the whole of U6006 Badlingham Lane is a vital corridor for bats commuting between roosting sites and foraging areas in the surrounding countryside. It is therefore important that none of the trees and hedgerows are removed and any crossing points are kept as narrow as possible [See Appendix for full survey].

Recommendations were to: 1. Leave dead standing trees as roosting sites; 2. Leave all trees with splits in the trunk and loose peeling bark as these are important roosting sites for Barbastelle bats; 3. Do not remove any wind damaged or dead branches from the old trees as the splits and holes in these also provide important roosting sites, often some distance from the main trunk; 4. Before carrying out work on any trees which may have cavities in them it is important that a thorough search is done to make sure no bats are present [contact the Bat Conservation Trust for advice]; 5. Do not remove or kill mature Ivy on the large trees as it provides roosting sites for Barbastelle bats; 6. Retain and improve any hedgerows and tree belts that link roosting and foraging areas as these provide good commuting routes for bats; 7. Maintain any areas of open unimproved flower rich grassland which provides insects for foraging bats; 8. Maintain ponds etc. in an open condition as they provide good feeding sites for bats; 9. It is important that no large gaps are created between the trees along Badlingham lane as this would interrupt commuting routes used by bats. Some species of bat will not fly across wide gaps in tree lines.

Sunnica have requested the right to remove overhanging branches etc as part of their works, [articles 36 & 37, Sunnica draft DCO, SEF 3.1, p27] which we strongly object to.



Fig. 15 Suitable roosting sites Barbastelle Bat along Badlingham Lane

As well as ecological and landscape interest, Badlingham Lane is of historic interest, possibly one of the three main routes of the prehistoric Icknield Way, a wide zone of travel consisting of multiple routes covering the south of England from Wilshire to East Anglia. Cyril Fox, using topographical and artefactual evidence, suggested it was of pre-Roman origin, possibly an extension of the Icknield Way or its Ashwell Street/Street Way variant, primarily of local significance to access the River Lark at Worlington [Cyril Fox, *The Archaeology of the Cambridge Region*, CUP 1923, pp147-9]. It may have been used as a mediaeval pilgrim route to Walsingham and other nearby shrines [Leonard Whatmore, *Highway to Walsingham*, The Pilgrim Bureau, 1973, CUL 9100.d.8683]. Hodkinson's 1783 Map of Suffolk showed it as one of a number of lanes and tracks crossing the heath but it was the only one retained subsequent to Freckenham's parliamentary enclosure in 1824.

An 'Icknield Way Riders Route' signpost stands at the Badlingham Road-Elms Road crossroad. At the time The Ramblers Association were devising their modern single Icknield Way Walkers Route and Riders Trail, broadly following the route of the historic the Icknield Way, it was assumed that Badlingham Lane was a farm track rather than a PROW, so horseriders were instructed to bypass it but walkers were encouraged to continue along the track to Worlington [Shirley Toulson, *East Anglia, walking the ley lines and ancient tracks*. Wildwood House, London 1979, p123].

The U6006 is scheduled to be 'Closed to all traffic save for traffic under the direction of the undertaker' for an undisclosed period; this is to enable its use by construction traffic and for underground cabling. It will no longer be able to fulfil its highway function as a through route for an undetermined extended period. [draft DCO, Schedule 4 *Street Works*, p51, Schedule 5 *Alteration of Streets* pp 54, Part 3 *Temporary Road Closures* pp 138-9].

The closed section will include the whole of the wood which has been in existence for a hundred and fifty years or more; it was sufficiently mature to be shown as an enclosed lane bordered by pine trees

on the highly detailed 1881 1st edition OS map, and may have existed since Worlington enclosure of 1799 as the wood begins at Worlington's parish boundary. The prominent Scots Pine at the Freckenham entrance [see Fig. 12] to the wood may be an historic parish boundary marker (this magnificent specimen is in the line of the cable corridor so would be felled along with all other vegetation along its route).

Works outlined in the draft DCO allows for underground cabling along the entire length of the wood with deep cable corridors of up to 30 metres working width, which is wider than the wood itself so in practical terms the wood will be destroyed. Freckenham PC is deeply concerned about Sunnica's request (Articles 36 & 37 of the draft DCO, SER 3.1, p 27) to remove trees and shrubs that interfere with their development and would strongly oppose this request. At the end of the construction period we would be left with a sterile corridor enclosed by metal security fencing topped by CCTV cameras. There are no plans for restoration of hedgerows and they certainly would be unable to replace the trees. [see Parameter Plan, Fig. 7]. As is made clear in the August 2021 Bat Survey [see Appendix] the whole of U6006 Badlingham Lane is a vital corridor for bats commuting between roosting sites and foraging areas in the surrounding countryside. It is important that none of the trees and hedgerows are removed and any crossing points are kept as narrow as possible.

Two 'permissive paths', outlined in green on Fig. 16, are offered at the Worlington end of Badlingham Lane. The righthand permissive path is within or on the edge of the order limits and will be subject to all the inconveniences of construction, visually, aurally and in polluted air; the route exits onto the busy Newmarket Road, which is without footways until it reaches Lark Close just before The Walnut Tree pub, so is potentially dangerous for pedestrians, dog walkers and horse riders. The lefthand permissive path appears to create a short circular route skirting Manor Farm or Reeder's stables school, returning to Badlingham Lane close to the point destined for the upper cable crossing, in full view of works and very distressing for people who value the mature trees and the bats they support.

These permissive paths are no substitute for the loss of an historic wildlife haven which has connected two historic communities since time immemorial. Moreover permissive paths are dependent on the goodwill of the landowners and could be withdrawn at any time, thus there is no guarantee they will remain available for the full 24 months or more that Badlingham Lane will be closed, or more worryingly permanently, as Figure 12-6 Public Rights of Way Post Construction implies. The experience of using such permissive routes in an industrial zone cannot compare with what we have at present. People would likely have to drive to more distant unspoiled areas for their recreation.

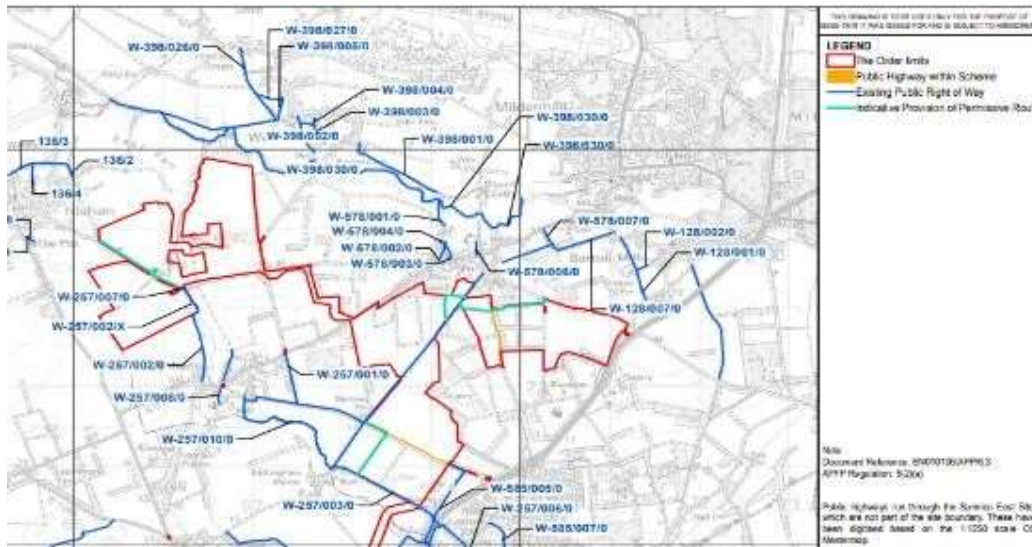


Fig. 16 Public Rights of Way Post Construction EN010106/APP/6.3 Figure 12-6 – ‘Permissive Paths’ shown in green

Blanding’s Farm footpath W-257/003/0

ORVal estimates the Welfare Value of this path at £12,822 per year and visitor numbers at 5,061. The footpath is accessed through Blanding’s Farm and runs parallel to Elms Road to Red Lodge terminating at a bridge over the Red Lodge bypass (A11). It is a useful extension to the Badlingham Lane path, convenient for residents of Red Lodge and serious long distance walkers who need a safe means of crossing the A11, or avoiding the increasingly busy Elms Road, which seems to attract HGVs despite warning notices that it is unsuitable for HGVs, much to the concern of drivers who have been known to lose wing mirrors. The bottom end of Blanding’s Farm path is also scheduled for an untold period of closure to facilitate cable works, cutting off its through function.



Fig. 17 Orval showing Blanding’s Farm footpath W-257/003/0, length from Badlingham Road to the bridge crossing the River Kennet at Red Lodge, 1.64 km.

A permissive path is proposed for here, see Fig. 17, taking a rectangular course parallel with Badlingham Road presumably with the idea of linking into Blanding’s Farm path. It has no practical function as it runs partly along the busy Elms Road then alongside construction works on Plot E19,

with attendant dust and noise, which could dangerously spook horses into bolting onto Elms Road. [NB We have been informed by the landowner that Sunnica have not approached them for permission to access their land]. If users were unable to link into W-257/003/0 this permissive path would be a pointless diversion forcing them to return and exit onto Elms Road. There seems little point directing walkers, with or without dogs, runners, joggers or horse riders along busy main roads, to which they already have access.

Unnamed circular route W-257/010/0

The last of the four Freckenham footpaths is the unnamed recently created circular route, W-257/010/0, following the perimeter of a large field, bordering the Lee Brook, Badlingham Road and Elms Road. This footpath will also be impacted by works as it will be in full view of the Scheme for most of its route.

Permissive Paths A loss of a PROW may not be a huge inconvenience if closed for three weeks or so but will be detrimental to health and well-being when closed for 24 months or more; two years is an extremely long time to be denied exercise in familiar or much loved places that have been relied on to relieve the stresses of modern life. It is no exaggeration to say that for the elderly it could be life changing. Mortimers Lane, Badlingham Lane and Blanding's Farm are half the total of PROWs in Freckenham parish. Remaining paths are the bridleway W-257/001/0, which is merely a shortcut between Elms Road and Mildenhall Road (B1102), similarly the path across Castle Mound, numbered W-235/008/0, is a shortcut between The Street and the church but can hardly be considered a good recreational walk. These paths, together with Mortimers Lane, Badlingham Lane and Blanding's Farm path are historical and practical in that they lead somewhere, and pass through some beautiful and diverse areas of countryside. Walking is a real pleasure here – an opportunity to spot wildlife and take in the rural landscapes. Permissive routes through industrial zones cannot compare and are unlikely to be used for leisure, only out of necessity (e.g. need to walk the dog etc). This would have a significant impact on the way of life here. Residents value the journey, not just reaching their destination.

It is clear that any Freckenham resident who values peace and tranquillity, will be forced to either forgo daily exercise or get in the car and find it elsewhere.

BESS concerns

The size and proximity of the BESS compounds is of major concern due to the volatile nature of lithium-ion batteries and their reputation for fires and explosions world-wide. Sunnica have provided minimal information about the BESS so residents are rightly concerned as they know about the risk of these, but Sunnica have offered no meaningful re-assurance. We have been denied the possibility of assessing the impacts of the BESS from a safety, noise and visual perspective.

Local business impacts

Freckenham PC shares the concerns raised by two local businesses along the Elms Road, who will be adversely impacted by the Sunnica development. They are: Mrs Linda Saich of Lindcoly Cattery

and Kennels and John James of Brookside Stud. We are aware that the business owners have submitted their own representations, which we support.

Noise concerns

Freckenham PC is concerned by noise during construction – especially as we are surrounded by the development on 3 sides. Operational noise and light pollution is a worry, given that East Site A is on rising ground to Freckenham village and in close proximity (1500m) to residents in East View. As Option 3 will have the voltage capacity equal to the Burwell National Grid and larger BESS compounds than the recently installed 50MW BESS at Burwell we fear our residents will experience the same unacceptable noise levels that Burwell residents complain about: of ‘a significant low frequency roar clearly audible in residential areas’ [Roger Osborn, 3 Jan]; and ‘a constant humming noise’ heard by local residents [Graham Radford, 27 Feb]; and that the noise is ‘a constant feature despite a distance of 1500m from the storage location to our property’ [Graham Gordon, 24 Feb]; and the noise is ‘far in excess of that promised’ [Hilary Binks, 2 March 2022]; and a ‘constant hum from fans’ [Jillian Gamlin, 25 Feb]. These effects will be especially adverse at night. [Quotes from Relevant Representations, 2022].

Freckenham PC does not have access to an acoustic expert, so will rely on submissions from the local authorities or other experts to cover these concerns. We would also recommend that acoustic impacts are assessed by a qualified and independent acoustic expert to ensure impartiality and accuracy.

Freckenham Parish Council

Freckenham Parish Council consists of 5 councillors with scheduled meetings every second month. The Parish Council object to the Sunnica Solar Energy Farm; their views are as stated in our response to Sunnica’s non statutory consultation in July 2019, but our concerns have intensified by the

- Size and scale which is disproportionate to the size of the parish, the acreage of the BESS at East Site B is larger than the village itself.
- Loss of productive agricultural land: contrary to Sunnica’s claims, since 2019 farmland earmarked for the Scheme has been under constant crop in a productive rotation of wheat, potatoes, sugar beet [EC02]. It is unacceptable in times of low food security and high international instability that large areas of land like EC02 will be soil stripped to be laid to acid grassland for wildlife mitigation.
- Loss of wildlife habitats – no amount of mitigation will guarantee that wildlife will use areas set aside for them. Our chalk streams are home to rare fish species and water voles but FPC has not seen mitigation planned for these.
- Loss of countryside views – something we treasure here are our long views and open skies, both of which will be heavily impacted, if not destroyed by this Scheme. It will take at least fifteen years for screening to grow to any serviceable height, but that in and of itself is alien to our open Breckland landscape.
- Industrialisation of the countryside - land is finite, agricultural land is precious and can be improved, but not when covered in glass panels industrial batteries and electrical substations. One of the benefits of solar is its versatility, it can go anywhere: according to a recent report, unused warehouse roofs have space for up to 15GW of new solar power, which could double the UK’s solar capacity by 2030, without competing with farmland.

[Report from Delta Energy & Environment for UK Warehousing Association, 1 Sept 2022].

- Noise pollution from construction - and at decommissioning (if that ever happens)
- Negative affect on village settings
- Effect on human physical and mental health
- Potential permanent change of landscape from agricultural to industrial

Conclusion

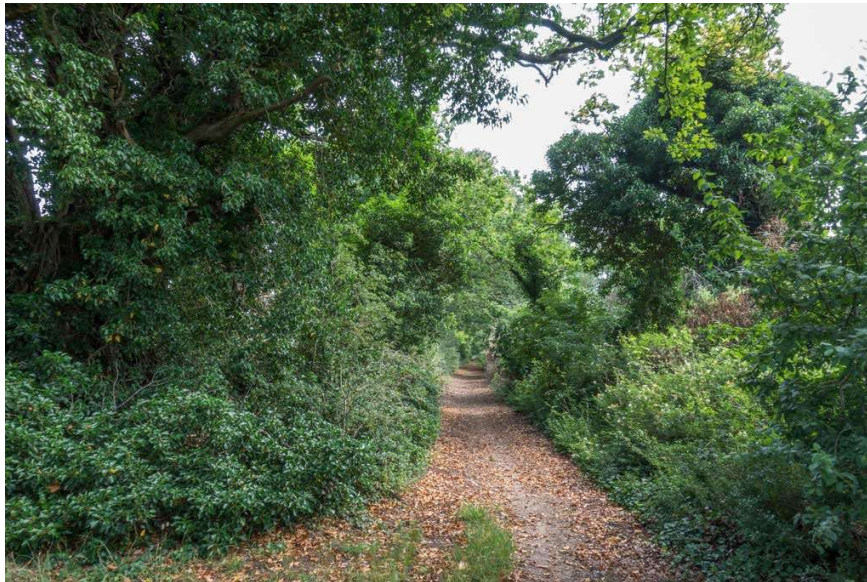
We hope this gives the examiners a picture of Freckenham village and its inhabitants and the harm that the Sunnica scheme would cause them on many levels. And with nothing in return from Sunnica save for a few permissive routes through an industrial park. We are not an island, the villages within the parish alliance and further towns operate as an extended community. For work, recreation and family life it is this interaction that gives us the quality of rural life which drew many of us here in the first place. The dread for all of us is that the enormous impact of this scheme would lose this forever and cut us off from one another.

Living in a rural community one is constantly at risk to the vagaries of weather conditions and the need for all of us to have care of our environment. No one in the community is against renewables but equally this must be weighed against the loss to British agriculture of highly productive land.

APPENDIX

Bat Survey carried out by Arthur Rivett of the Suffolk bat group

Badlingham Lane Bat Activity Survey 11th August 2021



1. Survey Methodology

The survey was carried out at various fixed points along the lane [see map]. The points were chosen because they were judged to offer good sheltered feeding areas for bats so as to maximize the amount of feeding activity detected.

Batbox Duet bat detectors were used in conjunction with digital recorders to record bat echolocation. Recording times were synchronized and ran for 90 minutes from sunset. Analysis was done on computer using Batscan and Batsound analysis programmes.

Survey Points, 11th August 2021



Badlingham Lane[Green Lane]
Bat Survey 11th August 2021.
Survey Points.

2. Summary of Results

Recording points 11th August 2021.

Point 1. TL69377312

Three species were recorded. Common Pipistrelle *Pipistrellus pipistrellus*, Soprano Pipistrelle *Pipistrellus pygmaeus* and Barbastelle *Barbastella barbastellus*.

Point 2. TL69337305

Three species were recorded. Common Pipistrelle, Soprano Pipistrelle and a Myotis species [probably Natterer's bat *Myotis nattereri*].

Point 3. TL69187286

Four species were recorded. Common Pipistrelle, Soprano Pipistrelle, Serotine *Eptesicus serotinus* and a Myotis species [probably Natterer's bat].

Point 4. TL69057267

Four species were recorded. Common Pipistrelle, Soprano Pipistrelle, Serotine and a Myotis species [probably Natterer's bat].

Point 5. TL69007257

Five species were recorded. Common Pipistrelle, Soprano Pipistrelle, Barbastelle, Serotine and a Myotis species [probably Natterer's bat].

Point 6. TL68867238

Seven species were recorded. Common Pipistrelle, Soprano Pipistrelle, Barbastelle, Serotine, Noctule *Nyctalus noctula*, Leisler's bat *Nyctalus leisleri* and a Myotis species [probably Natterer's bat].

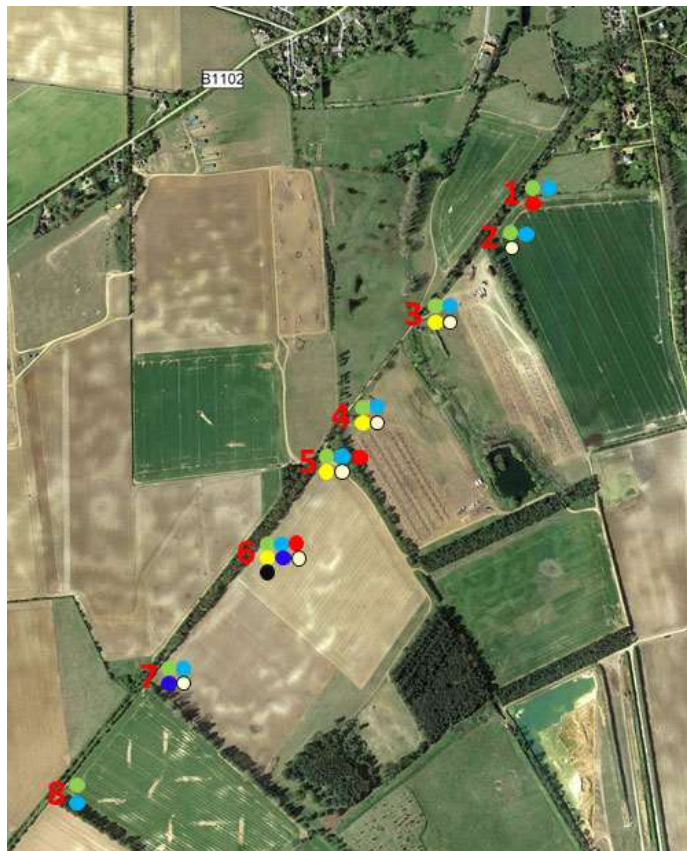
Point 7. TL68717215

Four species were recorded. Common Pipistrelle, Soprano Pipistrelle, Noctule and a Myotis species [probably Natterer's bat].

Point 8. TL68527190

Two species were recorded. Common Pipistrelle and Soprano Pipistrelle.

Species distribution 11th August 2021.



Badlingham Lane [Green Lane]
bat survey 11th August 2021

- Common Pipistrelle
- Soprano Pipistrelle
- Barbastelle
- Noctule
- Serotine
- Myotis species
- Leislars

3. Conclusions

Both Common and Soprano Pipistrelle bats were widespread along Badlingham Lane, being recorded at all points. These bats will be roosting in a number of different trees or buildings depending on the time of year and weather conditions. In both species there will have been main maternity roost sites during June and July with other sites being used at other times.

Barbastelle bats were recorded at three different points. The Barbastelle is a nationally rare bat with a stronghold in East Anglia, even here it is still rare with colony sizes being small and very mobile. Barbastelle bats roost mainly in trees but will also use buildings. As this species is very mobile with colonies regularly changing roost sites all of the old trees are very important. Roost sites will be in holes and splits in both the trunk and branches and behind loose lifting bark on dead or lightning struck trees. Ivy is also very important for this species as it is known to roost in crevices between thick stems and the tree trunk.

Serotine bats were recorded at four of the points. The Serotine is one of our largest bats and is not very common. This species is only known to roost in buildings, usually large houses and barns, there is a known roost in Worlington church. Serotines feed around woodland edges, along tall hedges and very low down over unimproved grassland which supports large insects, including beetles and moths. The pastures behind Manor Farm and the stables on the south side of Worlington village north of points three and four will be very important for foraging and Serotines will fly along tree belts and hedgerows to get to these areas.

Noctule bats were recorded at two of the survey points but as they fly high and travel long distances to feed the records could have been the same bat. The Noctule bat is still decreasing in numbers due to loss of roosting sites and good feeding areas. This is another of our largest bats, almost always found roosting in tree holes, they have a particular liking for the old Breckland pine trees, often roosting in old woodpecker holes. They will fly up to twenty miles at night from roost sites to good feeding areas and can be seen flying over as the Swifts go to roost.

The Leisler's bat recorded at point six is a smaller and rarer relative of the Noctule and will roost in buildings as well as trees. Leisler's bats mainly roost in tree holes and could possibly be roosting in one of the old pine trees in the area.

The Myotis bats recorded at six of the points could be any one of the four species we have in Suffolk, these are Daubenton's bat, Natterer's bat, Whiskered bat *Myotis mystacinus* and Brandt's bat *Myotis brandtii*. The last two are very rare in Suffolk and the most likely species will be the Natterer's bat which is a species that mainly feeds around trees and roosts in both tree holes and buildings.

There is one other species that we do not pick up on the bat detectors but is widespread in Suffolk and will be present along Badlingham Lane, that is the Brown Long-eared bat *Plecotus auratus*. This bat has very quiet echo-location and such sensitive hearing that it can pick insects, particularly moths, off foliage while flying in amongst the tree branches. Brown Long-eared bats roost in both tree holes and the roof spaces of buildings, including modern houses, churches and barns.

Badlingham Lane, good for foraging, commuting and roosting.



Suitable roosting site along Badlingham Lane for Barbastelle bats.



Example of lifting bark suitable for Barbastelle bats to roost behind.



Old pine trees along Badlingham Lane offer good roosting potential.



Old pine trees for roosting and unimproved pasture for foraging.



Old pine tree with holes suitable for bats



Flower rich pasture at Manor Farm, good for foraging.



4. Hibernation

It is likely that many of the older trees in the area will be used for hibernation for at least part of the winter, particularly by Noctule and Barbastelle bats. Barbastelles are known to roost behind loose tree bark as well as in cavities and will only move to alternative sites during very cold weather.

5. Recommendations.

Leave dead standing trees as roosting sites.

Leave all trees with splits in the trunk and loose peeling bark as these are important roosting sites for Barbastelle bats.

Do not remove any wind damaged or dead branches from the old trees as the splits and holes in these also provide important roosting sites, often some distance from the main trunk.

Before carrying out work on any trees which may have cavities in them it is important that a thorough search is done to make sure no bats are present [contact the Bat Conservation Trust for advice].

Do not remove or kill mature Ivy on the large trees as it provides roosting sites for Barbastelle bats.

Retain and improve any hedgerows and tree belts that link roosting and foraging areas as these provide good commuting routes for bats.

Maintain any areas of open unimproved flower rich grassland which provides insects for foraging bats.

Maintain ponds etc. in an open condition as they provide good feeding sites for bats.

It is important that no large gaps are created between the trees along Badlingham lane as this would interrupt commuting routes used by bats. Some species of bat will not fly across wide gaps in tree lines.

Acknowledgements.

Many thanks to Sandie Geddes and her group of volunteers for their time spent on this survey.

Arthur Rivett
27th October 2021

Contacts.

Suffolk Bat Group. [REDACTED]

Bat Conservation Trust. [REDACTED]