

From: [REDACTED]
To: [Sunnica Energy Farm](#)
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Sunnica Energy Farm - EN010106

Application by Sunnica Ltd for an Order Granting Development Consent for the Sunnica Farm Project

Written Representation of:

A G Wright & Son (Farms) Ltd (AGW) - Unique ref Nos:SUNN-AFP191
N R W Wright (NW) – Unique ref nos:20031080

The written representation below is submitted under ref nos: SUNN-AFP191
incorporating unique ref nos 20031080

Index
A/ Summary
B/ Background
C/ Consultation
D/ Leisure
E/ Carbon Footprint
F/ Concerns for the Long Term
G/ Agriculture
H/ Farm Budget
I/ Climate Change
J/ Fenland Soil
K/ Lark Abstractors Ltd
L/ Comments on SA application
M/ Comment on the six landowners and the descriptions give by DB
N/ Irrigation information
O/ Photographs
P/ Horse Livery Business
Q/ Compulsory Access
Conclusion

List of Appendices

1/ AGW Farm plan
2/ Emails unanswered by Sunnica

- 3/ Plan of Badlingham Lane horse riding track
- 4/ Letter from Mr Rowley Fenwick
- 5/ Crop yields from four local farmers
- 6/ Soil report by Patrick Stephenson Ltd
- 7/ AGW abstraction licence
- 8/ Letter from Environment Agency
- 9A/ Letter from Agritech Ltd
- 9B/ Letter from Greenvale AP Ltd
- 9C/ Letter from McCain Foods (GB) Ltd
- 9D/ Letter from Farmacy PLC
- 10/ Letter from RL&JP Long Ltd
- 11/ Sunnica Farms Budget
- 12/ Information on Lark Abstractors Ltd
- 13/ Environmental Statement Appendix 12B Soils and Agricultural Baseline Report. Daniel Baird Soil Consultancy Ltd
- 14/ Detailed Comment on Environmental Statement
- 15/ Summary of Abstraction Licences
- 16/ Plan showing Position of soil pits
- 17/ Letter from British Sugar – A Hagen
- 18/ Letter from British Sugar – P Watson
- 19/ Email to Natural England re: ALC grading
- 20/ Detailed Comments on DB report – Landownership
- 21/ Sale particulars for Farmer D land
- 22/ Plan showing land to grow crops for Bay Farm AD
- 23/ Irrigation Information
- 24/ Farmer A Reservoir photo
- 25/ Farmer D Reservoir photo
- 26/ Farmer C Reservoir photo
- 27/ Photographs of 2021 growing season on SISS
- 27A/ Plans indicating photo positions for 27 above
- 28/ Letter from livery owners at Badlingham Farm
- 29/ Compulsory access statement.

I attach a plan showing the AGW farm coloured in pink and green and the southern part of Sunnica East B edged blue **Appendix 1**

A/ Summary : We oppose the Sunnica Industrial Solar Site (SISS) because:

1/ SISS is too large and in the wrong place. SISS will be harmful to the area it occupies it will industrialise the landscape. Whatever mitigation is proposed SISS will always quarrel with the open rural countryside it is taking over. Unfortunately the proposed mitigation will also always look unnatural. The cumulative impact of SISS will affect 10 villages and 2 towns.

2/ The consultation by Sunnica Ltd (SA) has deliberately lacked detail throughout and has been impersonal. SA have avoided telling us the truth.

3/ The SISS takes out of agricultural production 981 hectares of irrigated vegetable growing land. This is not acceptable when we are only 54% self sufficient in vegetable production in the UK . Less than 0.5% of agricultural land in the UK has the benefit of Irrigation. This land is an agricultural jewel. SA have deliberately downgraded the land to predominately grades 3b and 4. Our professional advice is that at least 50% of the site is BMV. This are of land can grow over 32,000 t of produce per annum

4/ We are aware of the reports submitted by SA and the concerns raised by experts who have reviewed these reports for The Say No To Sunnica Action Group Ltd (SNTSAG). The information provided by SA is of poor quality and lacks detail. If you cannot rely on the quality of the evidence provided by the applicant how can we assess the application correctly.

5/ SA - Defend their application by saying as a country we have to reach net zero by 2050 which is a position we support. However we believe this target has to be achieved by supporting good renewable projects. A government target does not give SA the right to inflict an inappropriate scheme on communities and the country as a whole. SA if accepted would create a precedent that would make preventing other poor solar schemes very difficult in the future.

6/ Cranfield University have confirmed the scheme is a carbon emitter. Creating more carbon than it saves during its lifetime.

B/ Background

SA's application has been submitted because a grid connection was secured at the Burwell substation. The following chain of events then happened:

1/ SA realised that they would not be able to build a scheme of this size close to Burwell as it is all Grade 1&2 land.

2/ Working away from Burwell the first area where they felt (incorrectly) they could advance an agricultural argument that the land was of lesser quality and found a willing landowner was Sunnica West B.

3/ This process of putting the SISS together continued. If a willing land owner was found their land was added. If SA were turned down the cable run was extended and the harmful sprawling effect perpetuated. We know this to be the case as we were approached to include our land in the SISS.

4/ East Site A was only added to the SISS when land around Freckenham village was taken out.

5/ The SISS was not designed to integrate with its surroundings it happened were willing landowners could be found.

6/ The profitability of this site depends on securing the Battery Energy Storage Systems (BESS). The 31hectares allocated to the site for BESS will offer storage capacity for electricity well in excess of the amount that will be produced by the solar panels. This will allow the trading of electricity in and out of the grid which is hugely profitable. We recognise the need for BESS - but query why it needs to be put on three different sites in the countryside. Put the BESS close to the grid

connection and avoid all the damage SISS will do to the countryside.

C/ Consultation

1/ Emails - please see [Appendix 2](#) – Email trail of questions that remained unanswered for a period from 21st September to 18th November 2020. As SA failed to either acknowledge or reply to the emails sent we concluded it was not possible to consult with them via email.

2/ We attended the question and answer webinars, during Covid but these were unsatisfactory. Questions had to be submitted by email – the questions were sometimes read out and sometimes not. If SA replied to the question unsatisfactorily there was no chance to pursue it. We analysed the data from one webinar and found that less than 50% of the questions were given proper answers.

3/ Visits to Chippenham – Throughout the whole consultation process SA did not specifically visit Chippenham village to meet the locals or the Parish Council.

D/ Leisure

1/ Cycle - I am a keen bike rider. The narrow local roads that are being asked to take the construction traffic through our villages during the 3 to 5 years of construction as quoted by Sunnica at the ECDC planning meeting on 3rd November 2022 will make the area too dangerous to cycle.

2/ Horse riding. I also ride horses and regularly ride along the Badlingham Green Lane from Elms Rd to Worlington as shown in [Appendix 3](#) marked red. You will see riding from the south you will have solar panels on your right. Then you go into the part of the track when you will have solar panels on both sides. This means I and many others will not ride on this track.

3/ To ride a horse between two 2.5m high wire mesh fences with solar panels butting up to it on either side would be too dangerous. Please see [Appendix 4](#) a copy of a relevant rep submitted by Mr Fenwick who has had two serious riding accidents when riding close to solar panels.

4/ We regularly walk in the area and one of the joys of this is to walk and meet friends in other villages. The interconnection between villages is a special attraction to our area. SISS's sprawling construction and industrial foot print will impinge on this forever.

E/ Carbon Footprint.

I am aware of the Cranfield University report and their conclusion that during the lifespan of Sunnica it will generate more carbon than it saves. As a non-technical person I

find this alarming. I would ask that this is fully investigated. If Cranfield's conclusions are correct the credibility and reason for this scheme is hard to understand.

F/ Concerns for the Long Term

1/ Sheep grazing under the panels is not sustainable agriculture. It is a token gesture and should be regarded as such.

2/ The mitigation in the open flat landscape will never look natural and will therefore always been ineffective.

3/ The damage to soils will make it unlikely the land will ever be returned to agriculture

4/ 40 plus years is a generation it is not a temporary loss.

5/ SISS when decommissioned will be deemed to be a brownfield site and therefore highly unlikely to be returned to agriculture. The SISS must be considered therefore as a permanent loss.

6/ With the SISS as a neighbour the area will become vulnerable to other industrial developments on its boundary.

G/ Agriculture

AGW farm within quarter of a mile of Sunnica East site B as shown in appendix 1. We are therefore well placed to comment on SA's agricultural conclusions.

1/ In brief our farm consists of:

a/ Grassland – for summer grazing of cattle and railed stud land paddocks for rearing valuable thoroughbred and Arab horses

b/ Arable land - 172 ha – rotation of milling wheat, maincrop pre pack potatoes, maize, sugar beet, and onions in a 8 year rotation

c/ **Appendix 5** shows yields achieved by 4 local farmers over the last four growing seasons. The bottom line shows the average national yields provided by The John Nix Pocketbook an established guide to British farming performance. You will see that the four local farms have outperformed the national average in all but one crop in one year. The potato and sugar beet performances are exceptional. Please note the sugar beet yields have been achieved without irrigation.

2/ Soil type: the southern part of the farm is a sandy loam over chalk as we go north across the farm the clay content increases and is described as a sandy clay loam.

Appendix 6 is Patrick Stephenson Ltd report. He sampled Havacre 1 as shown on page 13 of the report as predominantly grade 3A with some 3B. In 2022 this field produced 71t per ha of pre pack Maris Piper for Sainsburys. The Nix average was 50t.

3/ Irrigation and farming – Because of the ability of the soils in this area to grow high quality vegetables and the availability of water in 2011 AGW decided to instal a 32 million gallon winter filled reservoir with a ring main around the farm boundary. The cost of this project was £485,000 part of which was grant funded by the EU as it improved and sustained employment within the area. Intensive vegetable growing generates jobs. The filling of the reservoir is controlled by a licence which is attached at **appendix 7**. The licence allows for extraction of water from the river between 1st November and 31st

March when there is sufficient flow in the river.

The system of winter fill reservoirs is supported by the Environment Agency. [See appendix 8](#). In the 12 years AGW have had the reservoir they have only not been able to completely fill it once in 2018. The reservoir is sized to hold water for two growing seasons.

The soils are ideal for producing a high quality pre pack sample of Maris Piper for the supermarkets. Please see [appendix 9 A B C & D](#) for supporting potato industry expert letters.

In 2021 AGW was awarded the prestigious prize of National Potato Grower of the year at the National Arable and Grassland Awards mainly because of the quality of potatoes we are able to produce from the sandy loam soils.

AGW let land for growing onions annually to RL&JP Long Ltd – please see [appendix 10](#) as confirmation of the suitability of the soils for growing onions.

H/ Farm Budget.

The SISS is a minimum of 981 hectares this area excludes the cable route. We have produced a model farm budget using 4 year local yield information and an accepted and suitable 8 year rotation. The conclusion is that this area would generate in excess of 32,500 tonnes of produce per annum making a net profit in excess of £850,000. [See appendix 11](#)

I/ Climate Change

With wetter winters and warmer drier summers light irrigated soil is becoming more valuable. When heavier land is unworkable in wet winters light land can be worked and during dry summers light land is more responsive to irrigation.

J/ Fenland Soil

As well as farming on the Breckland edge soils near Newmarket, AGW have farming operations on the Cambridgeshire Fens between Ely and Cambridge approximately 10 miles from the Sunnica site. One of our major concerns regarding the proposed SISS is the loss of productive agricultural land. Government is determined to see peatlands in the uplands and lowlands rewetted where possible, but has stated that any rewetting in the lowlands should not compromise agricultural production and profitability. Balancing these two objectives is not easy, and, in order to maintain business profitability, compensation will be required where land use changes reduce production. There is no guarantee from Government that funding will be forthcoming. It is important to understand these are significant pressures on production on our lowland peatlands.

We are members of Fenland Soil which is a non-profit organisation set up to help achieve climate change mitigation and biodiversity enhancement in the Fens and to help agree a set of numbers for GHG emissions from lowland peat so that we can better inform and influence future government policy that may be tasked with reducing production from lowland peats as a means of reducing the countries carbon emissions. There is significant work being done to help show a united front from farmers and help positively influence policy. Being part of this group has shown us the very real threat that lowland peat agriculture faces but also that there are mitigations that can be carried out. However most of the mitigations involve some loss of production for the fenlands as a whole and therefore further reductions in UK food. A great

example of why large scale solar installations must avoid productive mineral soils as food production cannot be transferred onto neighbouring fenland, it has its own pressures to deal with.

K/ Lark Abstractors Ltd

This Company has been formed to proactively manage the Lark abstraction area. To ensure the long term protection and agricultural success of the area. See attached appendix 12 for detail.

L/ Comments on Environmental Statement Appendix 12B Soils and Agricultural Baseline Report. Daniel Baird Soil Consultancy Ltd See appendix 13

In Summary – local knowledge and three soil experts conclude there is more than 3.8% BMV on the SISS. This is backed up by the available ALC and Predictive Land Assessment plans. DB's report fails in three categories of the British Society of Soil Science. If there is one failure the Society recommends the work is reviewed. See Appendix 14 for details

M/ Comment on DB's report Appendix 13 in relation to Landownership. Appendix 20

In summary the faults made in DB's report:

Farmer A –	Irrigation water available is incorrect BMV land on parts of this farm
Farmer B-	irrigation water available not mentioned BMV land on parts of this farm
Farmer c –	area is incorrect 99% of farm BMV
Farmer D –	Sale particulars describe the farm differently to DB Enough winter fill reservoir water to support a vegetable rotation on farm
Farmer E –	Irrigation water not mentioned All the land is committed to the AD plant.
Farmer F	Irrigation water understated All the land is committed to the Bay Farm AD plant.

N/ Irrigation information.

Winter fill reservoirs within the SISS - see details in appendix 23.

O/ Photographs

We have said the farming is good in this area and have attached a photographs of the cropping crops on the SISS during June 2020. Appendix 27 You will see the high quality of

the crops growing for growing season 2021. The numbering on the plans shows fields and corresponds with the photographs.

P/ Horse Livery Business

AGW have a horse livery business with up to 70 horses kept on the farm. This business employs 7 people full time and supports local vets, blacksmiths, saddlers and feedstock suppliers. Part of the business relates to the breeding of high value arab racehorses which is dependent on Newmarket retaining its position as the place to keep and breed racehorses. It is well documented in Rapley's paper to the ExA and other submissions that SISS will harm the racing industry.

The other side of this business is the riding livery owners. One of the reasons they have chosen to keep their horses at Badlingham is the rural location and hacking. Both these will be under threat if SISS happens. I have detailed this in the leisure section above and in appendix 3. Please see attached statement from the livery clients [appendix 28](#).

Q/ Compulsory Access to AGW land.

WSP Lands Team have been corresponding with AGW on behalf of SA since 1st April 2019. The correspondence is detailed in a schedule at [appendix 29](#).

In summary:

1/ Sunnica requested authorisation through the Planning Inspectorate (PINS) under Section 53 of the Planning Act 2008 to enter to survey AGW land on 19th December 2019. Hewitsons our solicitors replied with concerns to PINS 20th January 2020. PINS wrote to Sunnica and AGW on 13th August 2020 expressing concerns . AGW replied on 2nd September 2020 and have heard nothing further.

2/ S 172 Notices were served on AGW on 27th November 2020 and 12th March 2021 but no further action was taken by Sunnica

3/ AGW land has not been surveyed.

4/ Heads of Terms for the permanent Easement relating to the underground cable were sent to AGW ON 29TH June 2021 revised Heads of Terms were sent on 6th December 2021. No negotiation has taken place on these drafts.

5/ AGW was surprised to read in the Heads of Terms clause 6.1 under Planning and Promotion – 6.1.1 ' the landowner will not object or cause any objections to the developers application for DCO, either in principle or in relation to the particulars of the drafting of the DCO nor object to any applications submitted to the local planning authority'

6/ Sunnica have refused to pay AGW's Solicitors bill, and this remains unpaid.

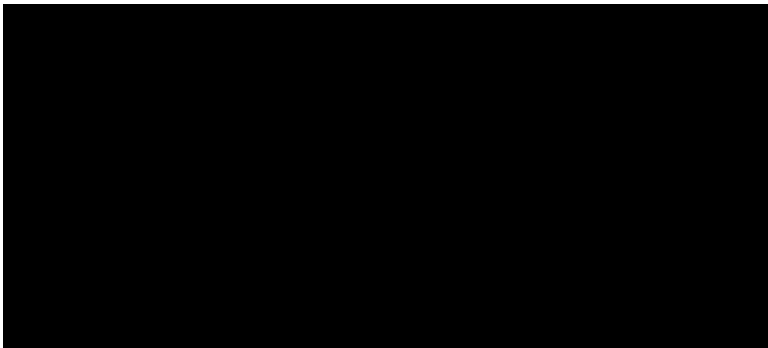
Conclusion :

Sunnica is too big and is in the wrong place. It will take 981 has of arable land out of farming forever. Over 50% of the site is BMV and is capable of producing over 32,000 tonnes of produce per annum. There just has to be a better place for large scale solar. **WE WANT GOOD SOLAR NOT BAD SOLAR. SUNNICA IS BAD SOLAR**

Jan Anderson
Accounts Manager



WRIGHTS DOWSON GROUP



BRITTON PROCOL VALVES
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HELI-TEC SEGMENTS
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