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## Objections to Sunnica Energy Scheme

Deadline 2 – 11<sup>th</sup> November 2022

Summary of the document below:

To summarise the Sunnica development is a wholesale abduction of good quality agricultural land and the areas unique archaeological heritage.

Sunnica are changing the edge of the Breckland landscape through mitigation of their proposed industrial development.

Communities will not only have to endure two years of excessive traffic disruption, there will also be the loss of visual amenity and restrictions on their Right to Roam.

Finally, Sunnica's approach to the consultation failed to present the facts in a clear and concise manner. Questions were answer with a reference to a document only, which could be anything from 5 pages to well in excess of 100 pages, in other words find it yourself. Hardly community engagement.

### **Inadequate Consultation**

- Sunnica faced envelopes were not used to raise the profile of literature being distributed to residents by Sunnica during the consultation period.
- Booklet reference maps had Town and Village names removed which made navigation of the Sunnica Proposal difficult at times to comprehend
- Booklet print used a grey print medium which lacked clarity.
- The use of the Covid Umbrella to force a non-representation by Sunnica at the Statutory Consultation process shows a disinterest to engage with the affected communities.
- The Statutory Consultation is a monumental failure for an industrial construction of this size and scale. The whole approach has been reactive and not proactive to demand

## **Battery Storage**

- Concern of the size and operation of the Lithium-ion Battery Energy Storage System (BESS) which still has to be finalised.
- Proximity to residential development, schools and major trunk roads is of great concern.
- Why are Bess battery storage systems not covered by the Control of Major Accident Hazards Regulations?

## **Visual Appearance**

- The influence of Climate change now, questions the choice of what is planted now to sustain 40 years of growth.
- From attending the ASI (Accompanied Site Inspections) it has become very evident that the visual impact from the proposed Sunnica Development will radically change the visual amenity in the area.
- Take for example View point 10.90D and 10.90E (Beck Road). This area has no hedges and sparse tree plantation as in 10.90D, this will be transformed into an alien landscape as in 10.90E that changes the edge of the Breck land Landscape.
- The visualisation photomontages only show the growth rate for the Sunnica 15-year timetable. The proportionate growth of the other landscape features had not been represented.
- The proposed Bess (Battery Energy Storage Systems) compounds and ground mounted Solar Arrays will cause significant damage to the visual amenity.

## **Environmental Impact**

- Wildlife habitat is under a major threat from noise and pollution.
- Loss of key Ground Bird Nesting habitat is under threat from relocation.
- Nocturnal species will be affected by artificial light across their foraging pathways.
- The planting of trees and hedgerows to screen the solar panel arrays, Bess compounds and transformers will change the Breck land landscape to the detriment of the current native species.

## Size and Scale

- Sunnica has failed to make full use of the current landscape features to plan their proposed development. The whole process has been one of “this is what we want” rather than “this is what we need to reduce mitigation.”
- Within a 15-mile radius of the Sunnica proposed development, there are already multiple ground mounted solar photovoltaic farms.
- Phased in schemes over time of smaller developments allows for advances in technology to be taken advantage of and reduces the need for vast scale mitigation of the countryside. (see Toggam Farm owned by West Suffolk Council, a brownfield site of a former maggot farm, <https://carboncopy.eco/initiatives/west-suffolk-solar-farm> )
- Sunnica is a “locked in time” construction that allows for no further advancement in green technology.

## Suffolk Heritage

- Piling for the panel supports will affect our archaeological heritage from excessive ground disturbance.
- Solar Arrays will alter the Breck land landscape and subject it to wind erosion and air turbulence.
- Wind erosion from the construction traffic on farmland could affect the silting up of the river water courses during the initial development phases. What is the planned maintenance for the water courses in the event of such damage?
- The effect of solar panel arrays upon the landscape from rainwater troughing has the ability to create a flooded landscape. This in turn will affect field drainage leading to carriageway ponding and dangerous driving conditions.
- Water courses will be affected by the surge of rainwater from the solar arrays.
- Glint and glare will have an effect upon the visual amenity at some time during the day.

## Infrastructure

- Concerns over the suitability of classified and unclassified roads to support construction traffic and Abnormal Indivisible Loads (AIL's)
- Carriageway damage from the construction phase will affect Kerb Stone Displacement, Man Hole Covers, Drainage Covers, Roadside Furniture, Soft Verge Erosion, Carriageway Markings and Frequency of Drain Clearance to avoid carriageway flooding.
- Winter light pollution from construction traffic headlights.
- Suitability of classified and unclassified roads to support two-way traffic. The B1102 Freckenham and the unclassified road to Sunnica East Site A being particularly narrow to support two-way HGV traffic. This was particularly noticeable when attending the ASI site visit to Sunnica Site A where a skip lorry had to mount the pavement to avoid our coach in Freckenham.
- Heavy Goods Vehicle (HGV) traffic during the winter months is intimidating for older residents driving to events within the locality.
- Loss of revenue for Village Halls during the winter months from sustained HGV traffic causing older residents not to attend their classes. (Freckenham Village Hall) Currently nominated for an award as the Most Active Community by Active Suffolk and Community Action Suffolk.  
<https://freckenham.suffolk.cloud/freckenham-village-hall/>

## Community Bereavement

- Reduction of access to PRoW (Public Rights of Way) is a direct loss of amenity value.
- Some PRoW will totally lose their visual amenity Reference Green Lane (U6006). The solar panels that will engulf Green lane are E16, E15, E14, E13 and E12. Views beyond these fields will be covered by further solar panels E17 and Bess and Substation on E18.
- Green Lane is a vital green portal for wildlife within our agricultural heritage that runs from Badlingham Road junction with Elms Road right through to the village of Worlington.
- Green Lane provides a safe passage for pedestrians, bird watchers, walkers and cyclists.

## **United Kingdom Food Security**

- Productive farmland needs to be protected to secure native food production.
- The land in and around the scheme has always been productive and rotated in accordance within good farming practises.
- The land is unique with its free draining soil that is ideal for the growth of root and cereal crops, carrots, parsnips, onions, wheat and barley to name but a few.

## **Project Scheme Failure**

- Sunnica have no track record for managing a scheme of this size.
- What are the risks associated with Project Scheme Failure for the communities affected by the proposal

## **Energy Trading**

- Is the Sunnica scheme a solar efficient scheme or does it rely too heavily upon energy trading to survive?
- Energy trading currently incorporates fossil fuel, so not clean energy.
- The Sunnica Proposal will not provide “cheap” electricity

## **Decommissioning Bond**

- Should be up and running in year 1 with an annual review in line with inflation.
- The Decommissioning Bond must be “Ring Fenced” for security.

## **Grant To Extend Sunnica**

- The grant to extend the “scheme” after 40 years should be referred to the local planning Authority for re-approval.

## **Land Classification**

How will the current land proposed under the Sunnica Scheme be classified after 40 years?