

I am all for renewable energy in its many forms of generation (solar, wind and hydro to name a few). However, from listening to and seeing the ever changing plan submitted by Sunnica Energy Farm (SEF), I am very worried. My concerns arise from claims made, lack of information, no maths as well as no science behind claims and just the amateur, random nature of the plans. For example, for such a large project why is the number of solar panels not known and estimated at 1.1 million (down 500,000 from previous estimates which is a considerable percentage), BESS design and layout still unknown, number of houses the farm can supply energy to varies by the day (which is understandable since BESS, solar panels, and everything else is not based on facts and figures, maths and science (physics and chemistry mainly)). There is just so much lacking and plans for something of this magnitude should be thorough and well documented and readily available for analyses by all parties.

Issues which need addressing which SEF simply have not addressed because they do not know, do not care and really are using this planning application to get rich rather than contribute to the national infrastructure and greater economy (less energy reliant on unstable foreign countries).

In the following, points 1 to 8 detail my specific concerns (part of my bulleted executive summary). Points contained in 9 list my overall worries. I have included a letter I sent to the MP for West Suffolk which includes diagrams, especially of BESS placement and proximity to houses and the school. Also, a letter I sent to the BBC describing my concerns. Apologies for the depth of my writing but I am a scientist and therefore detail and higher level research is what I do. I sincerely thank you in advance for your time and consideration in reviewing my opposition to the SEF plans and happy to answer any questions/queries you may have. Thank you.

1) BESS placement.

- a. Complete and reprehensible disregard for human life, health and wellbeing as well as residential and business properties. Moved one BESS site to closest possible position to Red Lodge. Done on a whim without explanation. This is dangerous.
- b. Distance of 1 km or even 1 mile is regarded as safe. 1 mile includes a school. Hundreds of homes as well, some only a few hundred metres away. To do this deliberately proves this claim.

2) BESS size

- a. Sunnica initially planned 10m high BESS units and reduced them to 6m after many complaints but this is still too high. You do not go too high and you must have the ability to vent during fire caused by thermal runaway. If not explosions will result. Lithium and hydrofluoric acid are two particularly unpleasant toxic substances given off from lithium battery first. This plan due to the amateur nature of the applicants has the potential to be an environmental disaster.
- b. Recently SEF change battery size to 10m. This is dangerous. They have done this so they can compromise and still get battery size of 6m. If granted, they will then re-apply for 10m high batteries.
- c. At 10m ability to vent means nothing. It will explode.
- d. The size of the 3 BESS sites means the capacity is far greater than the planned solar farm operating for 24 hours in brilliant sunshine. SEF have not released any numbers. It's all about storing energy from other sources.
- e. To not provide any details on batteries using excuse it is a developing technology is totally incorrect and improper. Battery technology will not advance much further than currently due to chemical components used so such an excuse is a smokescreen for they do not know, are unclear, do not want to declare how dangerous the batteries will be or all of these excuses.

3) BESS:

- a. No manufacturing QC or QA.
- b. Batteries will need replacing every 5000 recharges therefore over 40 years replacing at least once possible 3 times. Who pays? Where will the replacements be sourced from? Batteries rely on an even more finite source than current energy suppliers.
- c. No expert from BESS specialist firms on battery design (SEF have not got one). This should have been done immediately due to the SEF planned sizes. Why did they not do this?
- d. No HSE nor fire service report. Extensive contribution from these organisations should be produced.
- e. No police report on security. A massive American airbase is close by. Possible terrorist target? Hope not but must be considered.
- f. No BESS site design nor fire safety/extinguishing plans.

- g. No local evacuation plans.
- h. No battery supplier details. Nothing about where the materials required will be sourced and obtained.
- i. Korea, USA, Australia and UK – previous BESS fires and banning in South Korea. Latter tells its own story. One of the biggest manufacturer of batteries does not like BESS.
- j. During consultation Luke Murray used car batteries as an example of lithium battery safety. A couple of days after this Hyundai put out a EV recall. EV ship fire and sinking recently. EV cars banned from high rise car parks in Germany. They cause concrete to burn and weaken.
- k. Nothing on:
 - I. Efficiency.
 - II. Design.
 - III. QA and QC.
 - IV. Source.
 - V. Manufacturer.
 - VI. Repair and maintenance.
 - VII. Toxins.
 - VIII. Recycling.
 - IX. Waste management.
 - X. Risk analysis and management.
 - XI. Environmental protection.

4) Solar panels.

- a. One SEF director in a video stated 1.1 million solar panels. Said not 1.6 million. 500,000 solar panels is quite some difference in plans.

5) Solar panels:

Nothing on:

- I. Efficiency.
- II. Design.
- III. QA and QC.
- IV. Source.
- V. Manufacturer.
- VI. Numbers.
- VII. Repair and maintenance.
- VIII. Toxins.
- IX. Recycling.
- X. Waste management.
- XI. Risk analysis and management.
- XII. Environmental protection.

6) Loss of farmland and reliance on others outside of UK

- a. Loss of UK farmland means over reliance on others to supply UK food. The suppliers deforest to create farmland to supply increase in demand from UK. This contributes to global warming and therefore self-defeating.

7) Glint or glare.

- a. Pagerpower glint and glare report. Modelling not done as 'in their experience' it is not necessary yet they have never worked on something this big. Military airbase, major roads and residential areas nearby yet predict no significant impact/no solar reflections. This was deliberate.

8) Additional points to consider are:

- a. Previous consultations have been biased and contrived. Deliberately avoided all BESS questions (no excuse its lithium technology which will not advance); no glint and glare report for 1.1 to 1.6 million solar panels; biased SEF paid for environmental reports; deliberately misleading statements on SEF website and by SEF.

9) From listening to SEF people, SEF paid representatives (biased analyses of project to put it in good light), concern residents and doing my own research I have come to the following conclusions:

- a. The solar farm is an elaborate and very expensive smokescreen. Its maximum output does not meet the BESS's capacity (it will never achieve this because of its global location and can produce only a fraction of its claimed

maximum capability). It is about buying in cheap energy regardless of how it is generated and selling it back to the grid at inflated prices. The sites were chosen as there are existing solar panels near Red Lodge so a planning application can be made using National Infrastructure which circumvents any local planning requirements. Only reason for this. Why place BESS's 16 miles from the nearest hub?

- b. Sunnica stated to BBC News the land they have taken is low grade is a lie/deliberately misleading. It is high grade farmland.
- c. Only benefit SEF have said for local community is business rate, whatever that means.
- d. Number of shell companies are involved. SEF appears to be one. Shell companies are used deliberately to get out of liabilities. Is it that lithium battery energy storage systems are extremely dangerous especially when it's poorly planned?
- e. AECOM - environmental reports paid for by SEF. Will not look like this when finished. Putting forward best scenario.
- f. Bullying and intimidation during compulsory land purchase. During consultation stated it would not disclose land purchase negotiations.
- g. There is something very wrong when SEF can use the NI to compulsory purchase high grade farmland, and if granted then look to sell on this land at greatly inflated prices, multiples of what it was compulsory purchased for. That is wrong.
- h. SEF are using the NI to bypass local opposition and planning laws. This is not using the NI for the good of the country but an abuse of NI powers to get rich.
- i. Major SEF investor/partner is none UK company therefore money raised for the project from government (and the taxpayers) will go straight to this none UK entity (easily done by overcharging for work).
- j. During consultation Luke Murray stated it is about learning so the biggest planned solar energy farm is an experiment, a very expensive and dangerous at no risk to him.
- k. Companies used by Sunnica: AECOM, Pagerpower and IT company are paid by Sunnica to present best scenario on behalf of their client and deliberately critical points e.g. BESS, glint and glare, environmental impact, loss of farmland, and so on.
- l. Sunnica have gone round threatening landowners with compulsory purchase. Is this the actions of a trustworthy company or group of people?
- m. Discussions with land owners – ok to intimidate/threaten with compulsory order if do not want to lease land. Why won't Sunnica share these discussions? Sunnica avoid post development liabilities by leasing from landowners as just hand lease over to future purchaser of farm.
- n. Stated big six energy companies interested – need evidence of this. Need people and companies who know what they are doing. Why are these companies not involved now?
- o. Sunnica stated in zoom link webinar on Wednesday 25/11/2020 that they are learning about batteries therefore the residents surrounding the energy farm are an experiment/trial while he gets rich. Also, they are learning so contradictory as he's not around to learn from this experiment as he will sell it off most probably before its built. Deliberately misleading again.
- p. If it's a trial, build it trial size and someone else, more skilled, professional and experienced can do it instead of a group of get rich quick cowboys.
- q. Sunnica are not experienced nor skilled enough to deliver any type of solar energy farm safely and ensure it stays safe.
- r. By Sunnica controlling the webinars they were able to refuse to answer or dismiss questions or even be held to account by not answering questions or answering questions properly.
- s. BESS – only location and nothing else about them in all documentation supplied. No reference to health and environmental impact it could have.
- t. Lacking full and complete reports from EPA, HSE, Natural England, English Heritage, Fire Service and Police.
- u. The lack of experience and skills to carry out the project safely and successfully. Dormant companies, pop-up shell companies and companies with debts are involved.
- v. No risk assessments.
- w. AECOM - environmental etc report. No way will it look like this when finished. Putting forward best scenario. Paid by SEF to do this. Cannot believe this report.
- x. One director active director of 9 other companies, the other director active in 24 other companies. They have other interests. SEF is just a try to get through a scattergun effect of projects in multi attempts to get filthy rich.
- y. No plans submitted which state liabilities and who will be responsible for the inevitable battery fire and damage to human health.
- z. Sunnica have produced a lot of documents ([REDACTED]). However, there are some extremely important, possibly glaring omissions.

- I. Batteries – sourcing, storage, installation, placement, manufacture, quality assurance (QA) and quality control (QC), cooling, risk assessments, preventative strategies, HSE report, fire service reports, EPA reports.
 - II. Responsibilities and liabilities – ultimately who is liable should anything go wrong or just day to day running?
 - III. Batteries – used solely by the energy farm or storing energy from elsewhere?
 - IV. Solar panels – see queries/questions for batteries.
 - V. Sunnica Energy Farm - ease of access to emergency services?
- aa. No one from Sunnica especially the directors nor the planning departments have expressed their willingness to live within 1 mile of the batteries. Would they not want to live nearby?
 - bb. SEF Directors and all other people paid by them to report should move to Red Lodge and send their children to the school which is within the 1 mile radius of the BESS location. If they refuse they should state why they refuse.
 - cc. There should be a list of standards adhered to in the sourcing, manufacture and installation of all energy farm components. Especially battery manufacture. Quality Assurance, Quality Control, Product Verification and Validation with extended testing under extremes of temperature. This same applies to the air conditioning used to stop the batteries overheating.
 - dd. It appears Sunnica will build and sell or even sell before build. The issue therefore is who is responsible for the upkeep, health and safety and general maintenance of the site? Who is responsible for any issues, big or small, which will arise in the future? Without a clear responsibility path and structure, any future issues may be almost impossible to resolve quickly if there is any lack of clarity on responsibility. Quick, safe action will be paramount considering the Sunnica Energy Farm project proposal.
 - ee. After a review of the available documents, and there is quite a lot to read, a number of critically important reports and information are missing. The effects and potential effects of the Battery Energy Storage Systems (BESS) on health and environment and all other documents associated with a component of critical importance to the Sunnica Energy Farm.
 - ff. The very fact that Sunnica want to sell and leave at the earliest possible convenience speaks volumes about their true intentions and motives. It negates any statements they make about energy and the environment and any mitigating actions they are intending to put in place. It is all window dressing.
 - gg. From what I have read about Sunnica Ltd (as very little on Sunnica Energy Farm but the same will apply), it is a tender based business in that it wins major contracts, does not do much itself and sub-contracts work. In such cases the sub-contractors have very little margin so compromises happen which will not be in the best interests of the surrounding local population of West Suffolk and East Cambridgeshire. Typically, the main contractor is only concerned about its profit margins regardless of what promotional activities it undertakes. Examples of such companies would be Carillion and estate management companies.
 - hh. There appears no awareness of the proximity of schools to the energy farms and the batteries placements. Again, have the people at Sunnica, especially the directors, and planning officers sent their children to these schools? Would they allow them? Schools in Red Lodge and Isleham are very, in fact too close to the battery locations.
 - ii. There should be a list of standards adhered to in the sourcing, manufacture and installation of all energy farm components. Especially battery manufacture. Quality Assurance, Quality Control, Product Verification and Validation with extended testing under extremes of temperature. This same applies to the air conditioning used to stop the batteries overheating.
 - jj. The design of the Sunnica Energy Farm. Has there been a full quality assurance carried out on the solar panels to ensure they are of a high enough standard. What quality control are in place to ensure they are safe before and post installation?
 - kk. There is no plan for evacuation should an incident occur during installation and during operation.
 - ll. There is no fire service report. The fire service should receive detailed reports listing everything from chemicals used, risk assessments, equipment and apparatus present, detailed access to and movement through the solar energy farm.
 - mm. There is no 'in case of fire' report or emergency procedures. What plans such as automated fire extinguishing systems will be put in place? What form of fire extinguishing will these take? Will they be suitable for large battery fires which will be chemical based?
 - nn. There is no police report. Have the police been informed of the risks to their health should they be called to the site in emergency? Same for the fire and ambulance services.
 - oo. There are no Risk Assessments (RAs) covering batteries and solar panels.
 - pp. There is no full Health and Safety Executive report considering everything that should be covered.

- qq. There is no full Environmental Protection Agency report considering everything that should be covered.
- rr. There is no full Natural England report considering everything that should be covered. 6.2.2. negative impact environmental protection, Natural England.
- ss. There is no full English Heritage report considering everything that should be covered.
- tt. There are documents relating to environmental impact. However, has this been done deliberately, these do not include the use of lithium batteries (BESS) nor the solar panels themselves.
- uu. There is no quality assurance nor quality control nor risk assessment on the proposed use of air conditioning to cool the batteries. There is no report detailing back up plans in case of failure of the air con.
- vv. There is no report detailing where the batteries are being sourced from, what manufacturing systems were in place during their production – standards for battery manufacture used, quality assurance, quality control, ISO and guarantees or warranties.
- ww. There is no consideration of the effects the reflection from the solar panels will have on overflying aircraft. The concern is the build and leave attitude e.g. the glare report. The company who carried it out stated they did not look at it in their experience. This is a unique project and the first time such a large solar energy farm is planned therefore to simply dismiss because of experience is a dereliction of duty. It needs doing as this project smacks of build it and if any issues arise later it is not their problem as they have sold it on.
- xx. Glint and glare report by Pagerpower. They state no modelling done because they predict no significant impact/no solar reflections. The stated reason for this is their past experience. The solar farm is 3x bigger than anything else. It is the first of its kind this size in the UK yet in their experience, as they have experience of working on such sizeable projects, a solar farm this big, they do not have to assess by model the impact of glint and glare on nearby roads, houses and low flying , especially military aircraft. The military aircraft routinely fly around and over the proposed solar energy farm. This is a fact.
- yy. There is no report on prevention of deliberate interference with the solar energy farm. Military bases are located in the local vicinity.
- zz. Slight aside but an example of how to deal with issues by proper QA and QC. I received a message from Apple about a potential fault with the battery. They sent a shipping box, paid all costs for me to return it and replaced with a newer better iPod with no battery fault. The battery was a small lithium one which had overheated – it appears the issue was caused by batteries supplied from a single manufacturer.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] and [REDACTED]

[REDACTED]

- aaa. The transient, pop-up and small/micro nature of the business's involved indicate heavily that the plan is build, sell and leave. Maximise profits, say it's for the future when it is obviously not, and get out leaving someone else to pick up the pieces. How was this contract ever awarded to Sunnica Energy Farm and the many companies and people behind this dormant company?
- bbb. The submitted plans. Not only are they being changed, there appears to be no thought to the impact. Also, the area covered by the proposed solar farm. Again, there appears no thought in the design as it appears it's just thrown together in random manner and joined up by lots of cables. By doing this are SEF able to maximise profits by charging more for additional infrastructure which could have been avoided if a more professional, thoughtful, cohesive project design had been submitted.
- ccc. Remember the statistics of BESS fires and emergencies and damage: 22 fires in Korea, 3 fires in Australia, 2 fires in Arizona, USA and 1 fire so far in Liverpool, UK. Red Lodge next and at what cost. If a fire does happen it will be the biggest that is for sure.
- ddd. Sunnica Energy Farm is a 'Carillionesque' set up. It is a dangerous undertaking by people who do not care and just want to get rich quick.

In Summary:

These are just a few important points. I am all for solar energy and I am only highlighting the real issues associated with lithium battery storage and the involvement of build and sell companies. It is not a good combination and state I do not suggest or say or infer any impropriety has gone on but there is a lot of missing information and the plans of the directors of Sunnica Energy Farm as well as their abilities to deliver a safe solar energy farm has too many missing critical components as well as being rather haphazard in the project planning, for example, complete change of BESS location. Also, there has to be a highly detailed plan about batteries, their handling, placement, manufacture, maintenance and safe use. This is just one of a number of highly critical elements of a very complex

project. The reports provided by Sunnica Energy Farm and their online webinars do not inspire any confidence in me. I do want solar power but not at cost to future health and the environment. Anyone or any company cannot say they are committed to, in this case, solar energy when they intend to build and run with huge amounts of money.

For reference I sent this sent to the current MP a while ago:

Dear Mr Hancock,

I would like to take this opportunity to raise a number of questions I have about the Sunnica Energy Farm consultation and the documents they have provided.

However, before I begin I want to state for the record that I am totally for renewable energy such as solar, wind and hydro power. They are the future to both reduce the UK's dependency on others for our energy and it protects the environment for future generations in the UK and worldwide. On saying this though, the concerns I have is the people and companies engaged in such developments. Are they up to the tasks in hand?

These are only thoughts, opinions, observations and have put them forward to generate discussion and hopefully engage the right experts. I have done a bit of scientific research and have included some links should you and anyone else like to find out more about some of the points I have raised.

Initial main points:

1. BESS – only location and nothing else about them in all documentation supplied. No reference to health and environmental impact it could have (see points 2, 3 5, 6, 7, 8, 9, 10 and 27).
2. BESS location – closest point to Red Lodge. Just moved there. No thought (see Figures 2, 3, 4, 5 and 6).
3. Glint and glare report – modelling not done as 'in their experience' it is not necessary (see points 22 and 23).
4. Lacking full and complete reports from EPA, HSE, Natural England, English Heritage, Fire Service and Police (see points 11, 12, 13, 15, 16, 17 and 18).
5. The lack of experience and skills to carry out the project safely and successfully. Dormant companies, pop-up companies and companies with debts are involved (see points 4, 28, 29 and 30).
6. No risk assessments (see point 14).

My concerns detailed:

1. It appears Sunnica will build and sell or even sell before build. The issue therefore is who is responsible for the upkeep, health and safety and general maintenance of the site? Who is responsible for any issues, big or small, which will arise in the future? Without a clear responsibility path and structure, any future issues may be almost impossible to resolve quickly if there is any lack of clarity on responsibility. Quick, safe action will be paramount considering the Sunnica Energy Farm project proposal.
2. After a review of the available documents, and there is quite a lot to read, a number of critically important reports and information are missing. The effects and potential effects of the Battery Energy Storage Systems (BESS) on health and environment and all other documents associated with a component of critical importance to the Sunnica Energy Farm. (See Links 1 and Links 2).
3. The very fact that Sunnica want to sell and leave at the earliest possible convenience speaks volumes about their true intentions and motives. It negates any statements they make about energy and the environment and any mitigating actions they are intending to put in place. It is all window dressing.
4. From what I have read about Sunnica Ltd (as very little on Sunnica Energy Farm but the same will apply), it is a tender based business in that it wins major contracts, does not do much itself and sub-contracts work. In such cases the sub-contractors have very little margin so compromises happen which will not be in the best interests of the surrounding local population of West Suffolk and East Cambridgeshire. Typically, the main contractor is only concerned about its profit margins regardless of what promotional activities it undertakes. Examples of such companies would be Carillion and estate management companies.
5. Sunnica have produced a lot of documents [REDACTED]. However, there are some extremely important, possibly glaring omissions.
 - a. Batteries – sourcing, storage, installation, placement, manufacture, quality assurance (QA) and quality control (QC), cooling, risk assessments, preventative strategies, HSE report, fire service reports, EPA reports.
 - b. Responsibilities and liabilities – ultimately who is liable should anything go wrong or just day to day running?

- c. Batteries – used solely by the energy farm or storing energy from elsewhere?
 - d. Solar panels – see queries/questions for batteries.
 - e. Sunnica Energy Farm - ease of access to emergency services?
6. No one from Sunnica especially the directors nor the planning departments have expressed their willingness to live within 1 mile of the batteries. Would they not want to live nearby?
 7. There appears no awareness of the proximity of schools to the energy farms and the batteries placements. Again, have the people at Sunnica, especially the directors, and planning officers sent their children to these schools? Would they allow them? Schools in Red Lodge and Isleham are very, in fact too close to the battery locations.
 8. There should be a list of standards adhered to in the sourcing, manufacture and installation of all energy farm components. Especially battery manufacture. Quality Assurance, Quality Control, Product Verification and Validation with extended testing under extremes of temperature. This same applies to the air conditioning used to stop the batteries overheating.
 9. The design of the Sunnica Energy Farm. Has there been a full quality assurance carried out on the solar panels to ensure they are of a high enough standard. What quality control are in place to ensure they are safe before and post installation?
 10. There is no plan for evacuation should an incident occur during installation and during operation.
 11. There is no fire service report. The fire service should receive detailed reports listing everything from chemicals used, risk assessments, equipment and apparatus present, detailed access to and movement through the solar energy farm.
 12. There is no 'in case of fire' report or emergency procedures. What plans such as automated fire extinguishing systems will be put in place? What form of fire extinguishing will these take? Will they be suitable for large battery fires which will be chemical based?
 13. There is no police report. Have the police been informed of the risks to their health should they be called to the site in emergency? Same for the fire and ambulance services.
 14. There are no Risk Assessments (RAs) covering batteries and solar panels.
 15. There is no full Health and Safety Executive report considering everything that should be covered.
 16. There is no full Environmental Protection Agency report considering everything that should be covered.
 17. There is no full Natural England report considering everything that should be covered. 6.2.2. negative impact environmental protection, Natural England.
 18. There is no full English Heritage report considering everything that should be covered.
 19. There are documents relating to environmental impact. However, has this been done deliberately, these do not include the use of lithium batteries (BESS) nor the solar panels themselves.
 20. There is no quality assurance nor quality control nor risk assessment on the proposed use of air conditioning to cool the batteries. There is no report detailing back up plans in case of failure of the air con.
 21. There is no report detailing where the batteries are being sourced from, what manufacturing systems were in place during their production – standards for battery manufacture used, quality assurance, quality control, ISO and guarantees or warranties.
 22. There is no consideration of the effects the reflection from the solar panels will have on overflying aircraft. The concern is the build and leave attitude e.g. the glare report. The company who carried it out stated they did not look at it in their experience. This is a unique project and the first time such a large solar energy farm is planned therefore to simply dismiss because of experience is a dereliction of duty. It needs doing as this project smacks of build it and if any issues arise later it is not their problem as they have sold it on.
 23. Glint and glare report by Pagerpower. They state no modelling done because they predict no significant impact/no solar reflections. The stated reason for this is their past experience. The solar farm is 3x bigger than anything else. It is the first of its kind this size in the UK yet in their experience, as they have experience of working on such sizeable projects, a solar farm this big, they do not have to assess by model the impact of glint and glare on nearby roads, houses and low flying, especially military aircraft. The military aircraft routinely fly around and over the proposed solar energy farm. This is a fact.
 24. There is no report on prevention of deliberate interference with the solar energy farm. Military bases are located in the local vicinity.
 25. There appears some work already being carried out in W15 at the very top but it is unclear if it's just the surrounding area for the buildings already located there (see Figure 1). An earth wall has been prepared and earth movers are at work. Sunnica needs to comment.
 26. Slight aside but an example of how to deal with issues by proper QA and QC. I received a message from Apple about a potential fault with the battery. They sent a shipping box, paid all costs for me to return it and replaced

with a newer better iPod with no battery fault. The battery was a small lithium one which had overheated – it appears the issue was caused by batteries supplied from a single manufacturer.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] and [REDACTED]
[REDACTED]).

27. There is also an excellent write up on the issues involving BESS by a local GP I believe. It's been reposted on the Red Lodge Facebook page.
28. A quick look at Companies House reveals quite a lot about Sunnica Energy Farm Ltd. It is quite the usual unclear set up. 2 Directors (one involved in 9 of 11 companies and another 24 of 45 – dissolved or resigned hence of). According to companies house Sunnica Energy Farm Ltd is a dormant company and was formed in 2018. The only significant interest stake holder in Sunnica Energy Farm is Sunnica Ltd. One of the directors of Sunnica Energy Farm is 1 of 3 directors of Sunnica Ltd and has over 25% stake in Sunnica Ltd (which is active). The other 2 directors have major stakes in Jigg Fm UK Limited which is the other significant stake holder in Sunnica Ltd. It would appear Sunnica Energy Farm has been set up for this purpose and will in all probability not exist post completion or sale. They all share the same address. Some may say that's the way it happens. I just would like to know why it cannot be simpler or is this too complex a request?
(<https://find-and-update.company-information.service.gov.uk/search/companies?q=sunnica>).
29. Furthermore, in the documentation provided, Sunnica Energy Farm (small business) is stated as being proposed by Sunnica Ltd. Sunnica Ltd. (small business) being a joint venture between Tribus Energy (a management consultancy and micro business: <https://find-and-update.company-information.service.gov.uk/company/11770878> incorporated in 2018) and PS Renewables (another dormant company: <https://find-and-update.company-information.service.gov.uk/company/08279667> incorporated in 2012). Yet in companies house there appears to be no mention of their direct link to Sunnica Energy Farm. Quite odd this. However, there is a connection in that both directors of Sunnica Energy Farm are a director of either Tribus Energy (Tribus Clean Energy Ltd really) or PS Renewables. Tribus Clean Energy Ltd, PS Renewables and Sunnica Ltd share the same address as Sunnica Energy Farm. The significant interest holders of Sunnica Ltd is a director of Sunnica Energy Farm (SEF) and Jigg Fm UK Limited who has one director of Sunnica Energy Farm. So directors and significant interest holders are all intertwined and for the most part share the same address. Either way points 25 and 26 are viewed, there appears a disconnect in the Sunnica Energy Farm statement (on website: [REDACTED] / see 'About Us') and screenshot (Figure 1).
30. The transient, pop-up and small/micro nature of the business's involved indicate heavily that the plan is build, sell and leave. Maximise profits, say it's for the future when it is obviously not, and get out leaving someone else to pick up the pieces. How was this contract ever awarded to Sunnica Energy Farm and the many companies and people behind this dormant company?
31. The submitted plans. Not only are they being changed, there appears to be no thought to the impact. Also, the area covered by the proposed solar farm. Again, there appears no thought in the design as it appears it's just thrown together in random manner and joined up by lots of cables. By doing this are SEF able to maximise profits by charging more for additional infrastructure which could have been avoided if a more professional, thoughtful, cohesive project design had been submitted.

A note worthy point which I have a real issue with regarding validity and reason for making the statement when it is contradicted by the facts (see Figure 1. Screenshot for SEF website). To quote from the website: 'Sunnica Energy Farm is being proposed by Sunnica Limited – a joint venture between two established solar developers, Tribus Energy and PS Renewables. Together the Scheme partners have assembled an experienced team with a strong track record of delivering high quality solar and energy storage developments.'

Two of the mentioned companies are dormant and not active. One is just over 2 years old (incorporated).

Contradicts the 'two established solar developers' statement a little. This could be regarded as misleading, possibly deliberate.

Additoinal Bullet points:

- I. No mention of batteries except location (which has changed recently).
- II. No reference to prevailing wind direction.
- III. No reference to noise pollution from air con.

- IV. Houses within 1000m of battery storage due to the recent change in planned location. Total disregard for peoples welfare – health and property. Placement, recent change, demonstrates deliberate disregard and disdain for people and properties of Red Lodge. 400 m at nearest point . A large part fo Red Lodge in 1 km radius and even more in 1 mile radius. Theres 2 schools in Red Lodge, with one lying within the radius. Sunnica has not thought for impact, just concenred with delivery and making money.
- V. East Site B. Batteries E18 placement. 4th closest point to Red Lodge, largets and most populated of the surrounding villages,
- VI. What are the regulatory body and the other regulatory bodies Sunnica Energy Farm are engaging with?
- VII. Why cross 2 county boundaries? Deliberate? More difficlut to co-ordinate opposition?
- VIII. Liabilities – accident or deliberate but what happens? Who pays? Insurance? Indeminty? House prices affected?
- IX. What do developers think – Barratts and Crest Nicholson?
- X. Environmental Impact Assessment (EIA). No mention of batteries. Why?
- XI. Preliminary Environmental Information Report (PEI Report). No mention of batteries. Why?
- XII. Tables 3 in Chapter 16 Appendix 16C. In the Risks section there is no mention of batteries as potential risks to human health. Questions validity if supplied documentation. Do not address, review nor investigate impact of batteries, one of the major components of the Sunnica Energy Farm. Why is this?
- XIII. Have the polcie been informed? How to deal with fire? Protected site? Report by them? Appropriate PPE in emergency?
- XIV. Chap 16 16.5 Lots of diagrams, maps and figures. For example. Include transformers, inverters, solar panels but none for the battereis. Also no assessment of batteries and dangers they pose.
- XV. What is stopping a cascade of fires to neighbouring batteries should one battery catch fire. Lots of info yet nothing on batteries.
- XVI. Who benefits from this clean energy? Not the surrounding villages that’s for sure. Who will farm supply?
- XVII. SEF-PEIR visualisation does not indicate prevailing wind direction i.e. no wind direction.
- XVIII. SEF – Covers/borders Isleham, West Row, Red Lodge, Barton Mills, Worlington, Part of Mildenhall, Fordham, Par of Exning, Snailwell, Chipenham, Burwell, Part of Newmarket – so not ideally located.
- XIX. Chap 10 App 10I. PEI Report. No mention of batteries
- XX. SEF states RL 0.4km from E18 yet nothing mentioned re: battery storage.
- XXI. All SEF reports, as do not include battery issues or concerns are not appropriate for this consultation. Major environmental impact of batteries.
- XXII. Risk Assessments – none
- XXIII. Full reports from HSE, EPA and Natural England are missing. Fire service also.
- XXIV. Appears Sunnica not fit nor capable of delivering the solar farm to necessary standards – to allow them to build and sell is dangerous.
- XXV. No clean up/decontamination reports. Who is repsonsible for life time and clean up of project?
- XXVI. Sunnica have focussed reports instead of doing what they should be doing – open and clear. Spent a lot of money doing this.
- XXVII. Do landowners realise their full and complete liabilities?
- XXVIII. Sunnica demonstrate their amateurism. Move BESS sites. Chop and change on a whim which demonstrates no planning. Cannot do this plan in a hotch potch manner.
- XXIX. Companies with significant interests in Sunnica Energy Farm owe significant amounts of money (have major debtors) or are dormant. Why?
- XXX. Was a full backgorund check done on people involved as it is hard to believe that they were given the tender/contract if there had been. Who gave tender to Sunnic and agreed deal? What is deal?
- XXXI. Apparently, the landowners were threatened with potential compulsory purchase if they did not lease their land. This is totally inappropraite way for Sunnica EF or whoever did this to behave. Also, again, it leads to responsibility. The set up appears that regardless, Sunnica Energy Farm and the Directors could walk away when they want or should any issues arise leaving the landowners liable. This is wrong.

Figure 1. Screenshot from Sunnica Energy Farm Ltd website.

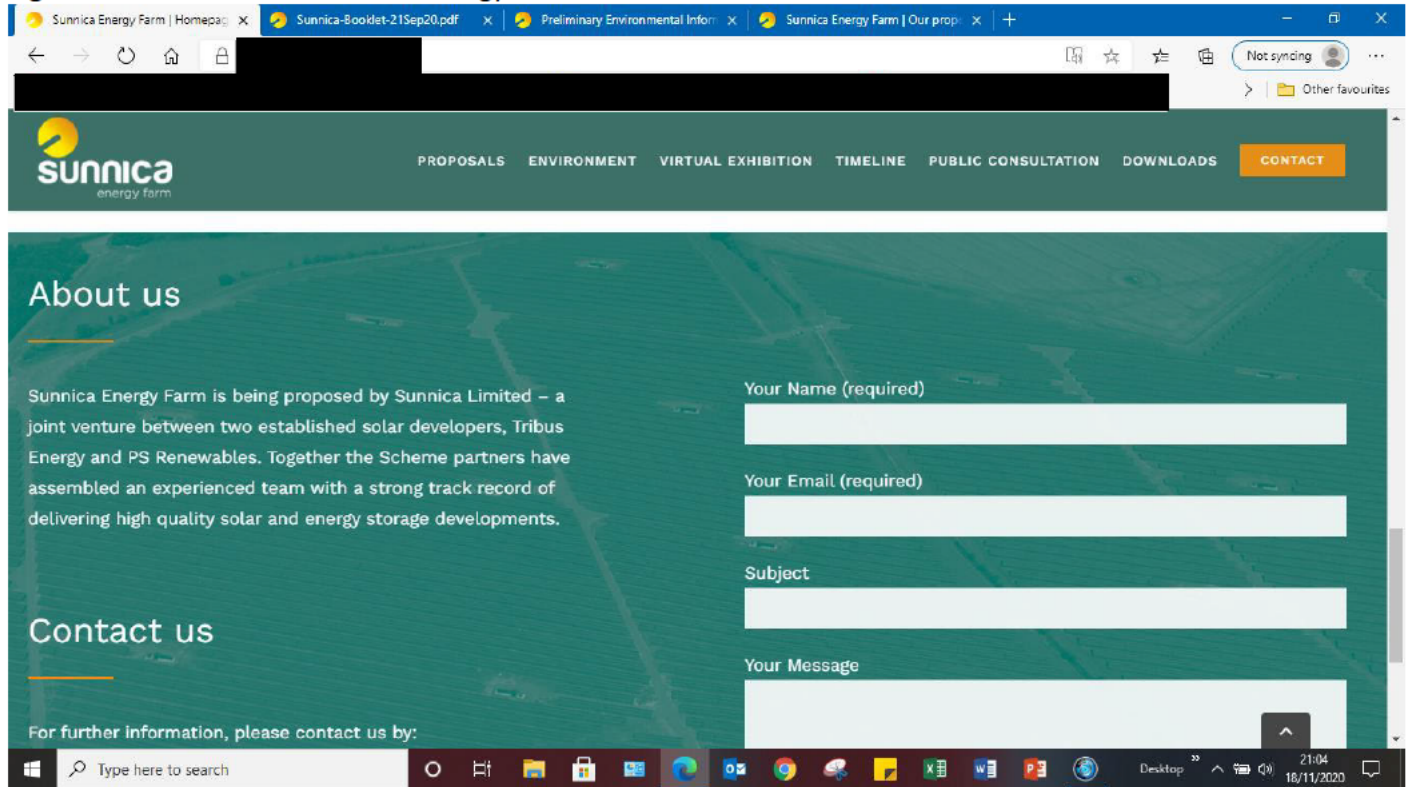


Figure 2. Map of proposed Sunnica solar Energy Farm.

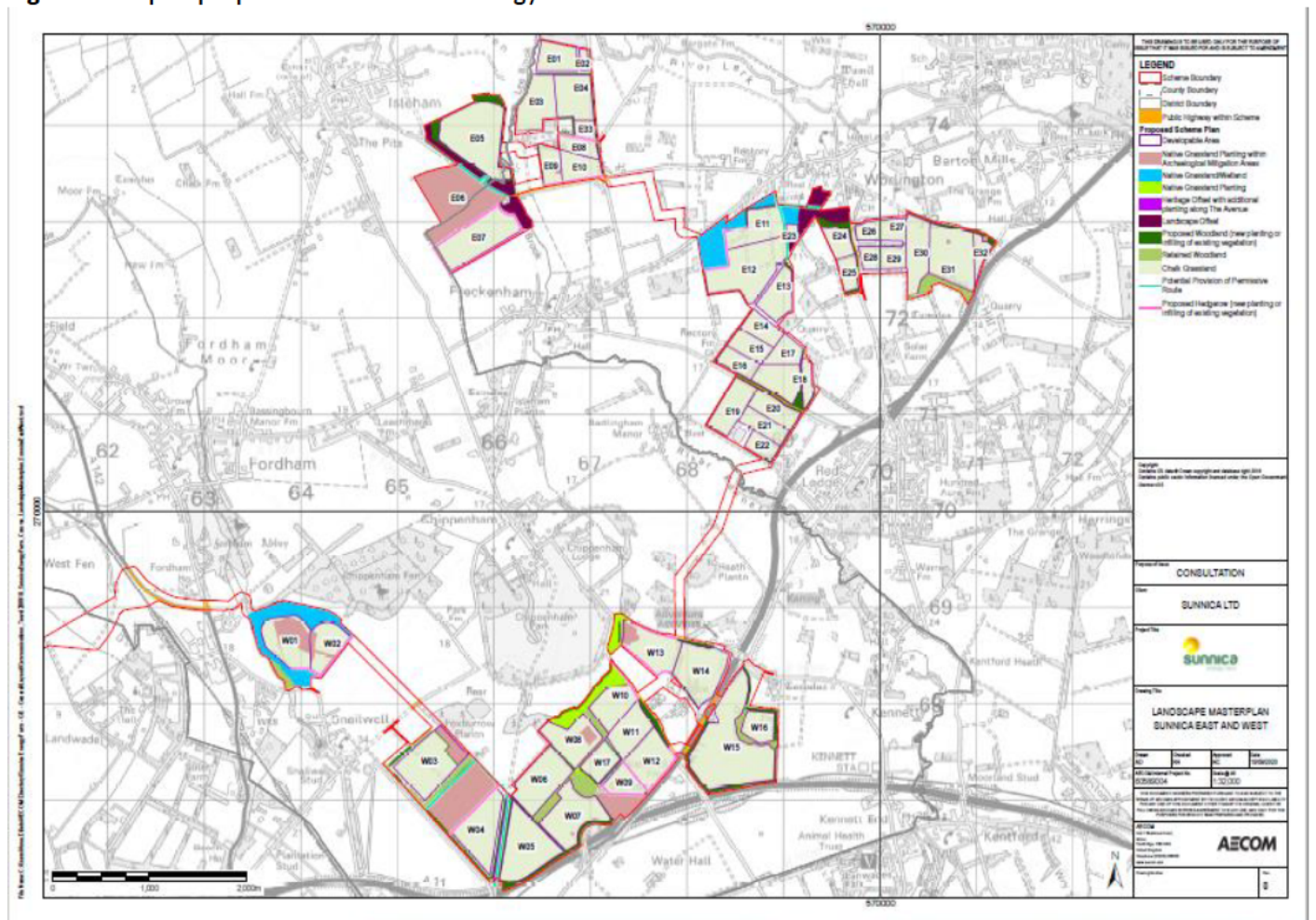


Figure 3. Map of 1000 m radius from centre point of E18 (BESS location).

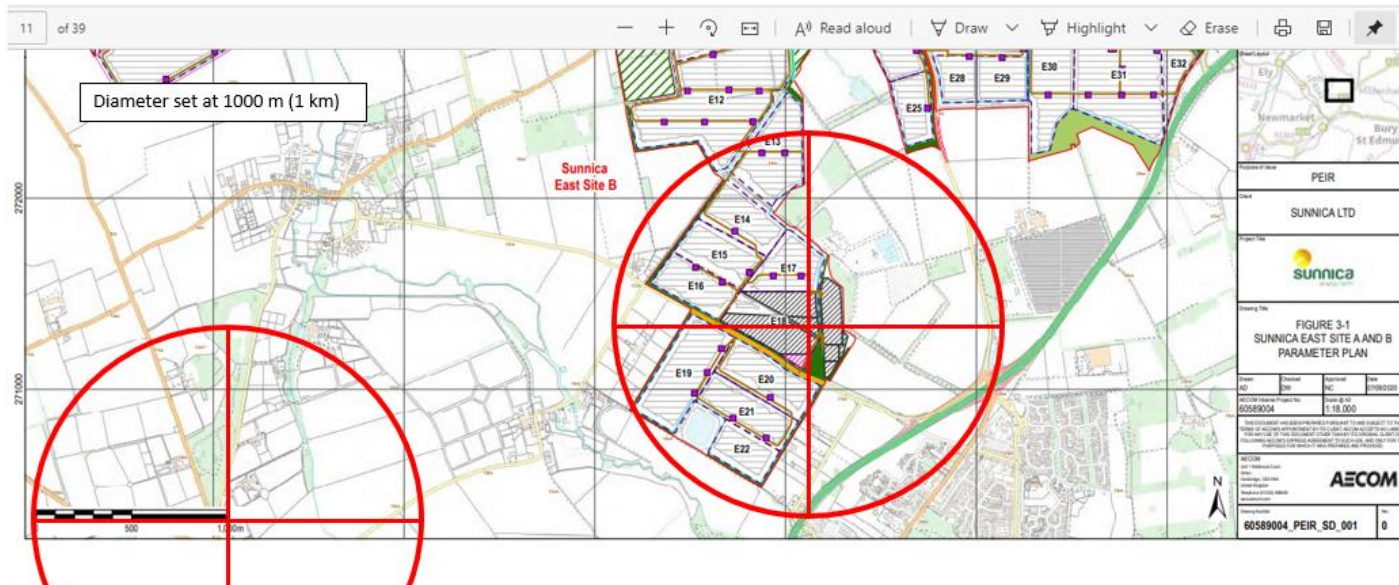


Figure 4. Map of 1000 m radius from closet point of E18 (BESS location) to Red Lodge.

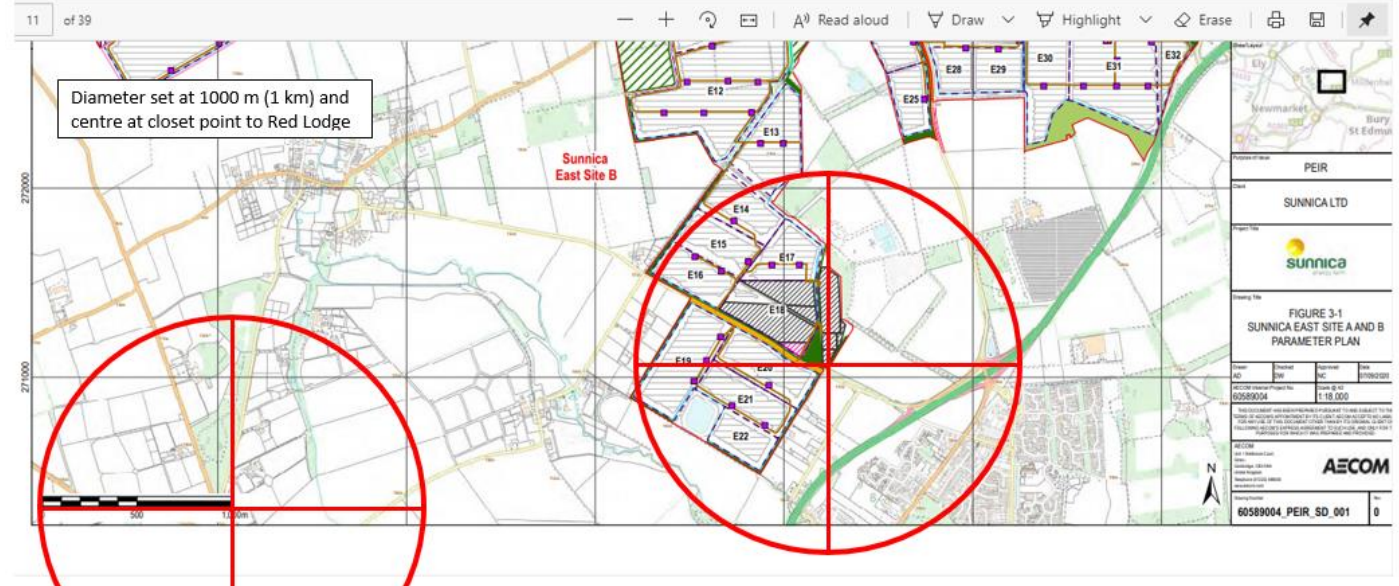


Figure 5. Map of 1 mile radius from centre point of E18 (BESS location).

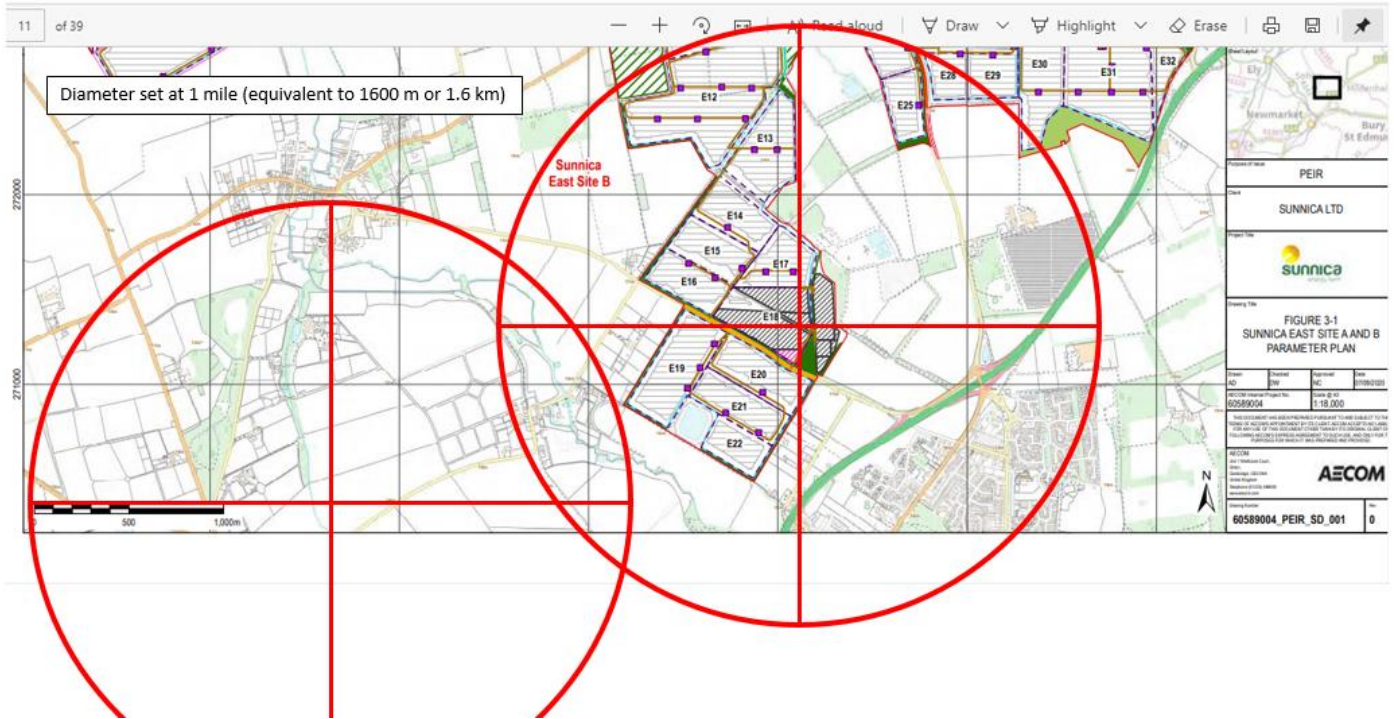
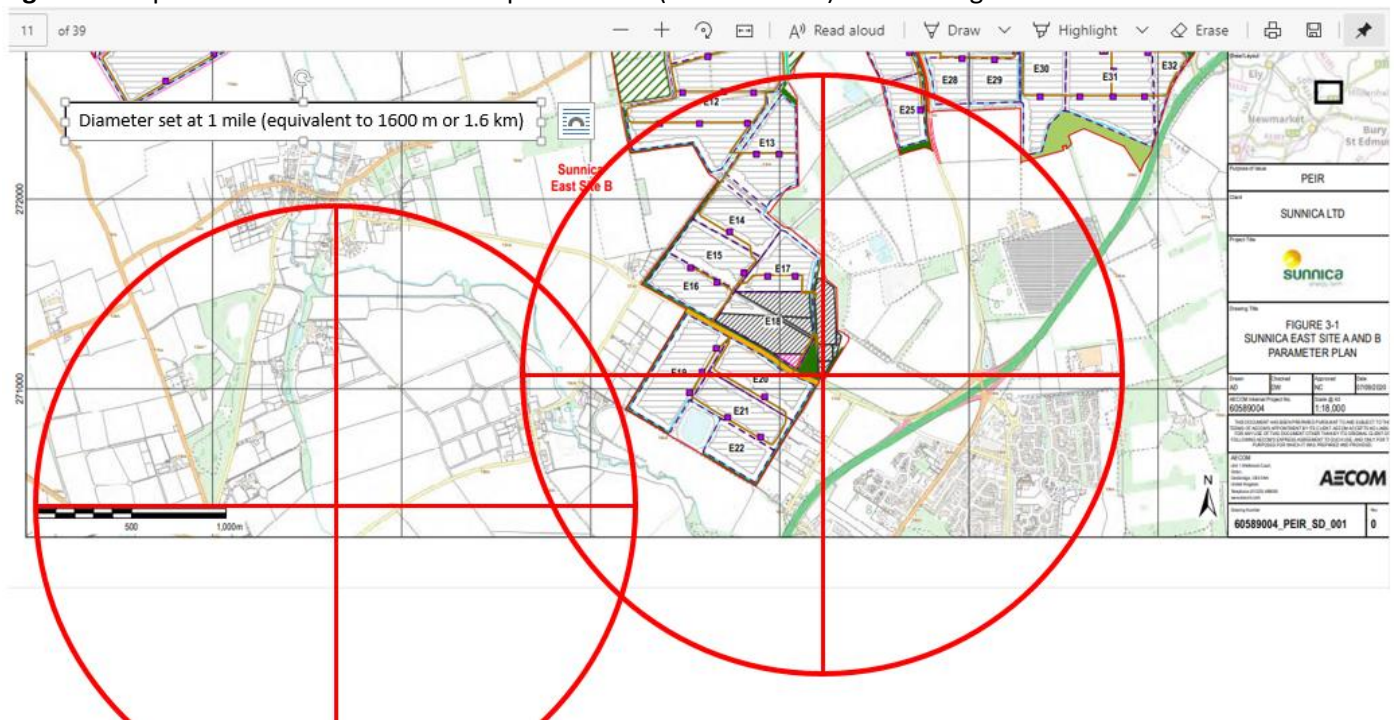


Figure 6. Map of 1 mile radius from closet point of E18 (BESS location) to Red Lodge.



Links 1. Issues with lithium batteries and hydrogen fluoride:

- I. Lithium batteries fires can release a large amount of hydrogen fluoride. Science paper: 'Toxic fluoride gas emissions from lithium-ion battery fires'.
Open access paper in Nature [REDACTED]
- II. Issues with lithium batteries. Lithium battery leaks. Science paper: 'Risk assessment of lithium-ion battery explosion: chemical leakages'
[REDACTED]
- III. Issues with lithium batteries. Science paper: 'Risk assessment of lithium-ion battery explosion: chemical leakages'.
[REDACTED]
- IV. Issues with lithium batteries. Science paper: 'Application of RAC Method in Fire Risk Assessment of Lithium-ion Battery Factories'.
[REDACTED]

Links 2. A number of links highlight issues experienced at other solar energy farms and health and safety issues with some of the chemical used in the batteries:

- 1. [REDACTED]
- 2. [REDACTED]
- A. [REDACTED]
- B. [REDACTED]
- C. [REDACTED]
- D. [REDACTED]
- E. [REDACTED]
- F. [REDACTED]

I want to re-state this is not an exercise in scaremongering. Far from it. I am only highlighting the real issues associated with lithium battery storage and the involvement of build and sell companies. It is not a good combination and state I do not suggest or say or infer any impropriety has gone on but there is a lot of missing information and the plans of the directors of Sunnica Energy Farm as well as their abilities to deliver a safe solar energy farm has too many missing critical components as well as being rather haphazard in the project planning, for example, complete change of BESS location. Also, there has to be a highly detailed plan about batteries, their handling, placement, manufacture, maintenance and safe use. This is just one of a number of highly critical elements of a very complex project. The reports provided by Sunnica ENERGY Farm and their online webinars do not inspire any confidence in me. I do want solar power but not at cost to future health and the environment. Anyone or any company cannot say they are committed to, in this case, solar energy when they intend to build and run with huge amounts of money. Very happy to discuss my points raised and be corrected if anyone finds anything which needs updating. Thank you for your time in reading my review.

Kind regards, Simon.

Just think about legacy in your West Suffolk constituency. Don't be taken in by large amount of information when the most important part, the batteries is deliberately omitted. Remember the statistics of BESS fires and emergencies and damage: 22 fires in Korea, 3 fires in Australia, 2 fires in Arizona, USA and 1 fire so far in Liverpool, UK. Red Lodge next and at what cost. If a fire does happen it will be the biggest that is for sure.

Just emailed BBC News about a report they recently ran on the planned biggest Solar Energy Farm in Europe. It is about what is really happening.

Email address of BBC News: eastofenglandnews@bbc.co.uk

My email address: [REDACTED]

Email sent to BBC News:

Hi there,

My name is Simon Stafford and I currently live in Red Lodge, Suffolk. I am contacting you about your recent BBC News report on the planned Sunnica Solar Energy Farm (see link A.). If possible, I would like to invite you to consider the following and update your report once you have carried out further research and fact checking.

1) The statement made by Luke Murray about powering 172,000 homes. Elsewhere, his colleague mentions in a video link an estimate of 1.1 million solar panels not 1.6 million. That's out by 500,000 which is not a small number. Any estimate from Sunnica needs fact checking before publishing. Also, see point 3.

2) Sunnica stated the land they have taken is low grade is a lie/deliberately misleading. It is high grade farmland. This is a fact.

3) It is odd the report A. does not mention the solar farm is an elaborate and very expensive smokescreen. Its maximum output does not fill the BESS's (it will never achieve this because of its global location and therefore will produce only a fraction of its maximum capability). Let's be truthful and honest, it's about buying in cheap energy regardless of how it is generated, selling it back to the grid at inflated prices. The sites were chosen as there are existing solar panels near Red Lodge so a planning application can be made using National Infrastructure which circumvents any local planning requirements. Only reason for this. Why place BESS's 16 miles from the nearest hub?

4) Also, anyone noticed how many small companies are involved (Check Companies House please)? Sunnica appears to be one. Shell companies are used deliberately to get out of liabilities. I wonder why there is the need to do this? Is it that lithium battery energy storage systems are extremely dangerous especially when it's poorly planned with no quality control nor assurance, fire control, monitoring, no designs, distance from people and everything which needs to be done for dangerous large scale lithium battery developments?

5) Sunnica initially planned 10m high BESS units and reduced them to 6m after many complaints but this is still too high. Please engage in your own discussions with experts involved in BESS management and they will inform you that you do not go too high and you must have the ability to vent during fire caused by thermal runaway. If not explosions will result. Lithium and hydrofluoric acid are two particularly unpleasant toxic substances given off from lithium battery first. This plan due to the amateur nature of the applicants has the potential to be an environmental disaster.

6) Just had a thought. We are currently in an energy crisis due to reliance on others. We are seeing abuse/misuse of national infrastructure not to address this issue but to get rich quick. Here's my line of thinking and is a possible reach but if valuable farming land is being steam rolled for such abuses, we are losing the ability to produce our own food and then become food reliant on others. So that's an obvious issue. Also, the producers elsewhere need to produce more food. To do that they clear more forest for farmland. The net result is food dependence and environmental damage i.e. possible contributing factor to global warming by additional deforestation maybe? Bet they haven't seen that one coming or even thought about that one. In the drive to become energy independent by such reprehensible get rich quick schemes instead of genuine, realistic, workable, long term, renewable schemes, they could actually be causing more environmental damage and contributing more to global warming! Just a thought and I realise it may even be a very small factor but it may happen/contribute. Quite the opposite to Luke Murrays claim in the report link A. Myself, I'm all for renewables and in the UK wind renewable appears the better option to me. Maybe instead of using the money for such plans of and similar to Sunnica we need to invest in research into hydrogen fuel cells. Potentially much safer than lithium batteries. The waste given off from this technology is water. Hmmm.

BBC news reports:

A. Suffolk: Angry scenes at meeting about giant solar farm - BBC News [REDACTED]

B. Plans for Newmarket solar farm the size of '900 football pitches' - BBC News [REDACTED]

C. Giant Suffolk solar farm plan is substandard says council - BBC News [REDACTED]

D. Solar energy project: Suffolk County Council finds plans 'flawed' - BBC News [REDACTED]

Happy for you to contact me and confirm my identity. I look forward to hearing from you and discussing the issues.

Kind regards, Simon.