

Sunnica Energy Farm EN010106

Suffolk County Council Written Representation

Deadline 2

11 November 2022

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GLOSSARY OF ACRONYMS

<i>AIL</i>	<i>Abnormal Indivisible Load</i>
<i>BESS</i>	<i>Battery Energy Storage System</i>
<i>DCO</i>	<i>Development Consent Order</i>
<i>ExA</i>	<i>Examining Authority</i>
<i>FRA</i>	<i>Fire & Rescue Authority</i>
<i>HER</i>	<i>Historic Environment Record</i>
<i>ISH</i>	<i>Issue-Specific Hearing</i>
<i>HGV</i>	<i>Heavy Goods Vehicle</i>
<i>LIR</i>	<i>Local Impact Report</i>
<i>PRoW</i>	<i>Public Rights of Way</i>
<i>SFRS</i>	<i>Suffolk Fire & Rescue Service</i>

"The Council" refers to Suffolk County Council

A. Introduction

1. Suffolk County Council has submitted a joint Local Impact Report (LIR) [REP1-024] alongside the other host authorities, which contains a comprehensive account of the expected impacts of the project alongside some proposals for further mitigation. This written representation does not seek to duplicate the detail of the LIR, and instead summarises the overall position of Suffolk County Council regarding the Sunnica Energy Farm project as currently proposed.
2. In this, and other individual submissions, the Council will seek to avoid duplication or overlap with other local authorities' submissions by focusing those issues for which the Council has particular interests or duties. Any slight variation or omission compared with another authority's submission should not in general be taken as disagreement, but simply a reflection of different geographical and administrative zones of responsibility.

B. Suffolk County Council's general approach to energy infrastructure

3. The Council's Cabinet approved in 2021 its Energy Infrastructure Policy. This policy recognizes that the delivery of Net Zero carbon emissions in the UK by 2050 is required to limit the future impacts of climate change, and that this will result in a succession of electricity generation and connection projects in Suffolk.
4. As a result of the large number of projects hosted in Suffolk, Suffolk County Council has considerable experience of engaging with energy infrastructure projects under the Planning Act 2008 regime. Informed by this experience, the policy sets out that whilst recognising the importance of projects which could contribute to Net Zero the Council considers it is essential that projects do not lead to avoidable, unmitigated or uncompensated detriment to the communities and environment of Suffolk, and its existing businesses.
5. The Council will use this framework to guide its approach to participation in this examination.

C. Key Issues: Cultural Heritage (Archaeology)

6. Suffolk County Council Archaeological Service hosts the Historic Environment Record (HER) for Suffolk and provides advice on and oversight of archaeological issues in relation to planning matters.

7. Detail of the Council's concerns about archaeological issues can be found in section 7 of the LIR [REP1-024]. In summary, the Council wishes to ensure the smooth running of outstanding archaeological evaluation and mitigation programmes.
8. Considerable discussion on these programmes has already taken place between the two County Councils and the Applicant, and it is anticipated that outstanding concerns should be capable of being dealt with by agreement and ongoing dialogue throughout the examination and post-consent.

D. Key Issues: Landscape and Visual Amenity

9. Suffolk County Council hosts landscape expertise and is a partner, with Suffolk's district councils, in the Suffolk Landscape Character Assessment Project.
10. Detail of the Council's concerns about Landscape matters can be found in section 10 of the LIR [REP1-024]. The Council is primarily concerned that the scale, duration and extent of the proposal will have a significant adverse impact on the landscape, which will require an ambitious commitment to high-quality mitigation and, where possible, avoidance of impacts. In some instances, this may require changes to be made to the Application to remove development from parts of the site. The LIR is detailed in its assessment of impacts and proposals for mitigation, and this is not repeated here.
11. The Council has committed to working with the Applicant to achieve understanding of and improvement to current mitigation proposals. Notwithstanding this commitment to cooperation, this is a complex aspect of the proposal and it is anticipated that landscape and visual matters will necessarily be a key focus of the examination.
12. The Council notes and welcomes the inclusion of Landscape and Visual Impact as an agenda item for ISH2.

E. Key Issues: Socio-economics

13. Suffolk County Council has an interest in both skills development and economic growth in its area, and strengthening the local economy is a key ambition in our corporate strategy. The Council approaches this through a variety of partnerships, including with developers of energy infrastructure.

14. The Council's concern is that the assessment of impacts is technically flawed to the degree that the scale of impacts of the development are unclear, and that it is therefore difficult to determine the necessity and appropriateness of any mitigation. Detail of these concerns can be found at section 12 of the LIR [REP1-024].
15. Though the Council set out its concerns at consultation stages with the offer to work through these with the Applicant, development of the position with the Applicant has been limited until recently. The Council and the Applicant are at the early stages of discussion, and the Council hopes that an effective relationship on these matters can be agreed with the Applicant to develop skills strategies, similarly to those established with other infrastructure developers in the area. The Council will be happy to answer the ExA's questions about these issues and provide an update on any progress with the applicant at ISH3.

F. Key Issues: Transport (Highways and Public Rights of Way)

16. Suffolk County Council is the Local Highway Authority (LHA) for Suffolk and has responsibility for managing and maintaining the local highway network as well as the Public Rights of Way (PRoW) network.
17. Detail of the Council's concerns about Highways matters can be found in section 13 of the LIR [REP1-024], while commentary on issues relating to the PRoW network can be found in section 14. At a very high level, the Council is mainly concerned about:
- a. the safety and deliverability of proposed site accesses;
 - b. the impacts of HGV and AIL movements on the local highway network;
 - c. the Council's ability to control works to the local highway network, which it has a statutory duty to maintain;
 - d. disruption and loss of amenity to users of the PRoW network; and
 - e. safeguarding the physical infrastructure of the local highway network from damage caused by construction traffic (especially HGVs/AILs).
18. The mitigation required by the Council to address these issues is set out in detail at paragraphs 13.114 to 13.145. In summary, the Council seeks:

- a. further information on site accesses at this stage of the planning process because failure to resolve such issues prior to determination may make appropriate resolution unfeasible and therefore compromise safe use of the highway;
 - b. robust controls and monitoring of traffic movements secured by either inclusion in the management plans or amendment to the face of the DCO;
 - c. technical approval mechanisms for all measures which involve works to the highway or traffic management measures as well as mechanisms for review of and compensation for damage to the highway. The need for these provisions applies equally to the PRow network.
19. The Council has returned comments to the Applicant on proposed Heads of Terms for a side agreement which could resolve some of the issues related to technical approval and monitoring of physical highway infrastructure. However, a side agreement would not necessarily resolve all of its concerns, and the Council respectfully suggests that it would be useful for transport matters to be examined at a future Issue-Specific Hearing (ISH).

G. Key Issues: Battery Fire Safety

20. Suffolk County Council is the Fire and Rescue Authority (FRA) for Suffolk and hosts Suffolk Fire and Rescue Service (SFRS). SFRS would be one of the emergency service agencies to respond in the case of a fire at the proposed site.
21. The details of the Council's concerns about fire safety matters can be found in section 18 of the LIR [REP1-024]. The Council would like to highlight that its expertise in this domain is limited to the operational response to an emergency event, and that SFRS does not host in-house electrical engineering or technology-specific expertise. The Council is therefore more concerned with the appropriateness of response planning measures and the design of mitigation features than with technical specifications of the Battery Energy Storage System (BESS).
22. As the Applicant seeks flexibility over the precise technology and configuration of the BESS, it is not useful at this stage to be prescriptive about what measures should be provided. The Council considers instead that the DCO and the

supporting outline Battery Fire Safety Management Plan should provide a robust framework for approval of detailed matters. This means that at the post-consent stage the final management plan should at least cover the provision of water supplies, access for emergency response, emergency preparedness measures, and the containment of environmental damage. The DCO and outline plan should require that the detailed design of fire safety features is justified by reference to rigorous modelling and testing by qualified fire engineers.

23. The Council understands that the Applicant intends to provide an updated outline Battery Fire Safety Management Plan, notes the inclusion of fire safety issues on the agenda for ISH3, and looks forward to exploring this issue in more detail in the light of the revised plan.

H. Key Issues: Flood Risk, Drainage and Water Resources

24. Suffolk County Council is the Lead Local Flood Authority (LLFA) for Suffolk and has responsibility for managing the risk of flooding from surface water, ground water and ordinary watercourses.
25. An outline of the Council's concerns about flooding issues can be found in section 6 of the Council's Relevant Representation [RR-1340] and more detailed commentary can be found in section 9 of the LIR [REP1-024]. In general, the Council is interested in securing appropriate assessment of flood risk and implementation of Sustainable Drainage Systems (SuDS) measures at the detailed design stage.
26. In principle, the implementation of high-quality SuDS measures can be decided in the post-consent phase of the project through requirements. However, the Council's experience of other projects indicates that it is important that SuDS features are sized appropriately at an early stage, as they can occupy a large area and it is difficult to make amendments to the order limits of a project after a Development Consent Order is made.
27. The Council notes the inclusion of flooding issues on the agenda for ISH3, and will be happy to elaborate on any of the points raised.