

Written Representation of Snailwell Parish Council Sunnica Energy Farm (EN010106)

1 Summary

1.1

Snailwell Parish Council (SPC) does not support the Sunnica proposal and considers that development consent should not be granted for the proposal as submitted.

SPC recognises the potential national benefit of green energy generation and does support renewable energy projects, particularly when maximising the use of roof tops and brown field sites and prioritising these a over greenfield locations. We also believe that they should be shown to actually reduce global carbon emissions, especially when being proposed on sites that have other economic value.

The rationale for the decision not to support the Sunnica proposal is set out in detail, which follows. A consequence of the scale of this proposal is the fact that our Written Representation word count is above 1500. Therefore we have provided this summary.

- The size and layout of the scheme would have a cumulative and substantially adverse impact on our community and way of life – 2.3, 2.5, 2.8, 2.9,
- NSIP Solar Panels and Batteries – 1.3 Policy Framework
- Ecology, Rare Species and Nature Conservation – 2.4, 2.5, 2.6, 2.12, 2.13
- Landscape and Amenity – 2.3, 2.4,
- Heritage – 2.5,
- Transport and Access – 2.3, 2.7, 2.9, 2.12
- Battery Energy Storage Safety and Fire Risk – 2.9, 2.10, 2.13
- Solar Panel Generating Stations and Battery Co Location 1.3, 2.10
- Carbon Reduction – 2.1, 2.11, 2.13
- Insufficient Information – 2.2, 2.11, 6.1
- Construction and Noise – 2.12,A
- Operational Phased Noise – 2.12, B
- Decommissioning – 2.14
- Water supply, Hydrology and Drainage – 2.13

- Alternative locations – 3.1
- Air Quality – 7.1
- Review of the financial and emotional burden placed on the region

1.2

Introduction

This Written Representation is submitted by SPC to ensure that the ExA is informed of the matters of concern to our Parish which appear to be very similar to the matters concerning all other communities affected by the entire proposal by Sunnica.

Throughout the pre-submission period Snailwell Parish Council (SPC) has worked with and formed part of the Parish Council Alliance. Each Parish has agreed to submit separate parish specific Written Representations. SPC support and endorse our four 'host' District and County Councils Joint response and their unanimous vote to reject Sunnica's proposal.

1.3

Policy Framework, Applicability of BESS as NSIP, BESS Location

Solar panels are not currently included in the 2008 Planning Act, NPS EN-3 or any relevant National Policy Statements, and the Battery Storage is excluded. In addition, Battery Storage was removed from the NSIP regime in The Infrastructure Planning (Electricity Storage Facilities) Order 2020 with reference to "exempt electricity storage facility" meaning an electricity storage facility which is not a pumped hydroelectric storage facility. As a consequence, the applicant's planning statement (see 1.4.4 – 1.4.5 of [[APP-261](#)]) states that National Policy Statement EN-3 does not 'have effect' for the purposes of S104 of the Planning act 2008, and is appropriate for the application to be decided under S105.

The Sunnica scheme comprises a vast area of solar panels, with grid scale battery energy storage systems (BESS) co-located with the panels on 3 of the 4 main sites (East Site A, Eats Site B and West Site A). Since the schemes solar panels are projected to generate more than 50MW they can be considered as an NSIP for application purposes as a generating station.

However as rechargeable batteries do not generate electricity or have valid technical necessity for co location with solar panels, we ask that the BESS should be removed from this NSIP application since we do not consider that the battery energy storage to be a material requirement or ancillary component part of this solar panel generating station. Battery storage can be located in an entirely separate separate location to the solar panels, with no reduction to the power output of the solar panels.

Completely stand alone Solar Panel generating facilities and BESS installations have been built throughout the country. One example of a local BESS installation is SMS 50MW storage built at Burwell Substation.

We understand that the Sunnica scheme intends to import electricity from the grid to the on site batteries, which further endorses our conclusion that battery storage located within the scheme boundary, is not a technically necessary requirement.

Furthermore, during Sunnica West Site A and Site B statutory consultation online meeting at 1800 on 10/10/2020 , relevant to Snailwell and the adjacent West A and B sites, Luke Murray answered a question about battery storage, made at 2.07:47. Luke explained at the point 2.08:46 that there was, "limited interplay between solar PV and battery storage" in this scheme and that when there was spare capacity on the interconnection when the solar PV was not able to use it, the interconnection would be used for importing and exporting electricity from the grid to the batteries. He also stated in the same answer that the scheme would not be economically viable without Battery Storage. Sunnica did not say the scheme would not be technically feasible without battery storage. In the same webinar at 1.28:57 Luke Murray stated that the Quantum for battery storage of 50 MW was 10 times that. Therefore SPC concluded that Sunnica propose 500MW battery storage. At 1.37 Matt Hazell stated 'that the aspiration was to Max out that connection importing and exporting electricity.

It is clear that it is not a technical necessity to co locate battery storage and solar panel generating stations and Luke Murray has confirmed this in his webinar. SPC requests the battery storage in this scheme to be removed as it is not necessary or a technical requirement or even part of the NSIP remit.

SPC does not consider that co located BESS is inherently needed to support large scale solar. As an example, the Mallard Pass NSIP that is currently in the planning system is over 2000 acres, and does not have BESS included. The need for the Sunnica BESS has not been adequately justified . In addition, since Sunnica have included BESS in their application, SPC does not consider that their location has been adequately justified by Sunnica as to why they have chosen to locate the BESS in the areas they have and further does not consider that the BESS proposal should form part of the NSIP process.

The only national advantage of BESS is to contribute to grid balancing. Independent BESS installations can and are being approved at suitable locations in England.

2 Specific concerns about the Sunnica scheme

Overall position

- 2.1 SPC recognises that solar panels can produce intermittent electrical power which reduces to zero output at night. Solar panels are part of a green power generating solution but are obviously not the entire solution. The Potential national benefit of renewable energy projects maximising the use of roof tops and brown field sites before any other site is in general supported by SPC if they can be shown to actually reduce global carbon emissions. If we ignore carbon emissions on a global scale, particularly emissions prior to entry to this country, we are ignoring the fundamental issue the global element of global carbon emissions which undoubtedly contribute to global warming.
- 2.2 SPC has a number of concerns regarding the proposal and will use this submission to highlight these. There is insufficient information to establish whether the scheme's impacts can be mitigated. Evidential issues cannot be addressed without clear data.

Scheme Design and Layout

- 2.3 SPC has concerns regarding the scale and layout and shape of the scheme as submitted and the resulting impact. The proposal as it stands comprises 4 main 'solar' areas (which in themselves comprise multiple parcels of land). These main areas are not in a single location, but spread out and in close proximity to the edges of the villages and in some cases people's homes. Unlike some of the other, more discrete, solar farms in this area (e.g. Triangle farm in Soham, Bay Farm at Worlington) the Sunnica main solar areas wrap around the villages and will make their presence felt. In addition, these 4 solar areas will then be connected to each other via an extensive cabling route which will have a negative impact on the area. This scheme layout is stretched over a huge area, and over 2 counties. It is approximately 15 miles from start to finish. Driving by car from one end to the other would be something like a 20-25 minute journey.

The scale cannot be underestimated. It is not like the solar farms we have near here. This means that not only is Snailwell affected by the design, but also around 15 other parishes and towns. The rural open agricultural landscape would be changed into a series of enclosed industrialised zones excluding the populations that live in them. The character and amenity of routes within the area will be compromised by this scheme. It would be highly visible in parts. Large areas of the varied and unique landscapes and distinctive areas will be removed. This leads to a reduced sense of identity for the communities, in addition to them being isolated from each other.

The isolation of each settlement due to the cumulative effect of infills and the consequential loss and degradation of non vehicular routes will change the rural open agricultural landscape into a series of enclosed industrialised zones excluding the population that live here. The character and amenity of routes within the entire area will be compromised by this scheme. Many sections will not be fit for purpose. One such section is the proposed route through Snailwell for site access to West Site B. This will funnel construction and operational traffic through Snailwell for 43 years.

Key concerns

Key concerns remain in relation to the likely environmental impacts, the quality of assessments of these impacts in a number of topic areas:

Landscape and Visual Amenity

2.4 The scale, 40 year longevity and geographical distribution of the proposed development are likely to result in significant and permanent adverse impacts as a result of intra-cumulative and accumulated effects. The isolation of each settlement and heritage assets like Chippenham Park, due to Sunnica's solar 'infills' will change the rural open agricultural landscape into a heavily industrialised area, cutting off and partitioning the populations that live here. SPC is concerned that the cumulative impacts of the proposal have not been adequately considered, the ES assessment tends to under-estimate impacts.

Mitigation proposals will not be effective across some areas particularly Limekilns, which is part of Snailwell Parish, and the negative impact this would have both recreationally and economically, even if it does establish, this will be at least 15 years in the making. So the stark transformation of the landscape into an industrialised one would be visible for at least a generation and mitigation itself will alter the character of the landscapes.

With specific regard to the impact on Landscape, in its entirety the scheme is likely to adversely affect residents' quality of life, contrary to the Design Principles of the National Infrastructure Commission and the Missions in the Levelling Up White Paper 2022 (Executive summary p.7) regarding well-being and Pride of Place. As examples:

A: The footpath and bridleway (204/5) located between the Godolphin Gallops and the Sunnica West A site runs from Snailwell to connect to the Bury Road at the top of the Limekilns gallops in Newmarket. Figure 1 shows this route marked out on a map.

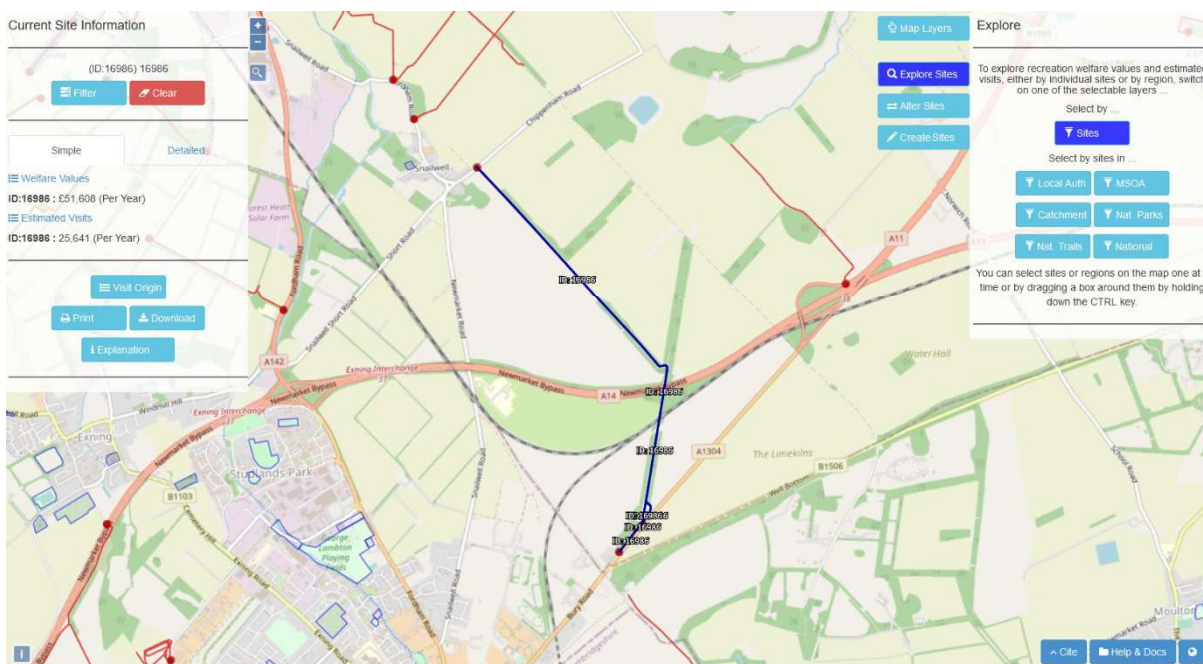


Figure 1: Map showing the Snailwell – Limekiln footpath (

This is the only readily accessible, and safe route for dog-walkers, joggers, families, cyclists, horse riders, etc. in Snailwell. It is used by local residents here and a number of people travel to use this footpath as it is accessible year round. The car park at the entrance (Figure 3) to this route from the Snailwell end is often overflowing, with cars parked on the nearby road verges.



Figure 2 Busy carpark at Snailwell – Newmarket footpath

As well as use for leisure this route also provides a safe, off-road path which connects people in Snailwell and other local villages to those in Newmarket. This connection between our village and our neighbouring towns and villages is important and is deep rooted in this area, where residents move homes between the villages or visit family and friends in nearby areas, or generally help each other out. One lady (Mrs Dunlop) said that she uses this route several times a week to meet her mother, as it is halfway between their respective homes in the nearby villages (see statement). Socialising in outdoor spaces was particularly vital during lockdown. SPC places a high value on this footpath.

Because it is easily accessed from Newmarket, there are often people from Newmarket who use these routes to run, walk, bring their family and friends or exercise their dogs. Cyclists and horses riders too. Residents from the area, particularly from Newmarket, are drawn to our local footpaths and bridleways which are an asset to our community. They are a haven for wildlife and people alike. The routes to Newmarket and The Limekilns are convenient, safe and are family and dog friendly. SPC has had comments from people concerned about loss, or change to this wonderful rural asset and its surroundings. The threat of this proposal, is causing a great deal of anxiety in the community.

Local residents and other members of our neighbouring villages have sent in photos of their use of the route, a selection of which are shown in Figures 3a and 3b



Figures 3a and 3b: Autumnal family meet up (between Chippenham and Snailwell residents) on left and Spring afternoon walk (Isleham family)



Figure 4 c and d: Dog walk - photos from the Newmarket side of the route, with views across the Al Bahathri gallop



Figures 4e-f: A couple enjoying a summer walk on the W204/5 (left). The route is especially popular on summer as it offers shaded areas for walking dogs. Professional dog walkers (right) also use this safe route

According to the ORVal tool (Outdoor Recreational Value tool by Exeter University, published February 2019) this route has 25,601 visits a year (Figure 2). This figure could have only increased since the two COVID lockdowns.

This is consistent, perhaps a little lower, with observation made by the Say No to Sunnica community action group who carried out a headcount survey along this route on Sat 14th May 2022 (between 9.15am to 1.00pm). They recorded 61 people during his period.

Part of this route is set to be closed by Sunnica during the construction period. This will be a huge loss, this route is an essential link for residents and visitors.

B: Limekilns area

Snailwell parish extends from the Bury road to the south of the famous Limekilns gallops and people often walk to and from the gallops to our village and pub, the George and Dragon. It connects to a number of other walks including access to the Warren Hill gallops and Newmarket avoiding the road route, which is not pedestrian or horse friendly. Horse riders can and do use these routes, as well as dog walker and other recreational users (see photographs from local residents, Figures 5).



Figure 5a Dog walker on Limekilns – wide open space allows them to be off lead. The large golden/yellow barn can just be made out in the centre-right



Figure 5b – Dog walkers – The Limekilns



Figure 5c – Looking down from the Limekilns footpath towards the A14 bridge crossing

The Limekilns is valued as it is an all year round asset, providing shade in the summer and shelter in the winter with wonderful, far-reaching views including Ely Cathedral (Figure 6). The routes are a perfect place to walk dogs, on and off their leads.



Figure 6 – Limekilns with Ely Cathedral (red line)

1) Another popular footpath in Snailwell is the W204/1.....

The other popular walking route is the W204/1 from Fordham Road to Chippenham and access to Chippenham Fen. This is a popular route for meeting up with family and friends from different villages as there is a pub at each end, THE George and Dragon and The Tharp inn to provide a welcome stop. If either of these routes are disrupted by Sunnica it will be a significant loss to the area and have a detrimental impact on the people and dog walkers who rely on them for exercise and welfare. The alternatives are to get in a car and travel elsewhere, which is not something residents expect to have to do when living in the open countryside.

This route provides off road access to Chippenham Fen, a tranquil and valued nature conservation asset on our doorstep. Chippenham Fen will be almost impossible to reach from Snailwell off road if this project is approved. This would be a loss to our residents and visitors, some of whom are keen naturalists.

2)

Snailwell village attracts people from the surrounding area. The George and Dragon pub is one of the closest 'country pubs' to the town of Newmarket, and its accessibility via the routes detailed above means that it is a popular spot. It's well known bonfire and fireworks display attracts large numbers from Snailwell and the nearby villages. (elsewhere. The delightful access roads in open countryside attract people to the village and they make the journey to the pub to meet family/ friends or just start a countryside walk through the village.

Some visitors ask about the Say No To Sunnica signs and comment how awful it would be if it was given the go ahead. Some Snailwell residents are considering moving away because they cannot bear to think of the area with the Sunnica development dominating the countryside. All the houses on an elevated street called The Green at the top of Snailwell enjoy views from their property looking over the fields where West Site B is proposed. Their view is almost uninterrupted in the autumn when the leaves fall off the trees. They will have West site B in full view from their properties.

3) Aside from off-road routes being affected by Sunnica, the main route into Snailwell from Chippenham (Chippenham Rd)

This route is popular with cyclists and has recently benefited from tree preservation orders on all the Beach trees which line the road on both sides. This view in fig 7, will almost certainly be a constant reminder of Sunnicas presence despite attempts to mitigated with new planting.



Figure 7 View from Chippenham Road looking North towards the West Site B area.

Ecology and Nature Conservation

2.5 There have been no compelling reasons why this entire scheme and its applicant have not avoided the most sensitive habitats. Proposed developments such as this should seek to avoid impacts on biodiversity as a priority the term is Mitigation Hierarchy.

The schemes identification of land use and quality is not accurate. In concord with other areas an appreciation and appraisal of land and its current usage at West Site B will highlight significant deviations from the proposers assessment. Several areas designated as arable in Sunnicas report is meadow or pastureland or simply fallow.

Successful nature conservation and any claims in line with the principle of biodiversity net gain is highly dependent on accurate assessment of the current environment and critically on future management and monitoring.

Inadequate consideration for adverse impacts to Chippenham Fen and Snailwell Poor Fen Ramsar site and SSSI including Snailwell Meadow and Fenland SAC has been made in the Habitat Regulations Assessment. There is insufficient detail provided within the application to safely base conclusions of no significant effects on the ecological receptors identified within the zone of influence of the scheme.

The cable routes cut through and join the entire scheme and it has been noted that contrary to similar earthworks on major water main projects, there is no acknowledgment or mitigation offered to make good the detrimental effects of soil and substrata compression due to the heavy construction traffic, particularly along the route of the cables where presumably a construction route will have to overlay or parallel the cable trench.

The Defra Metric spreadsheet used by Sunnica at an early stage of their proposal, was not made available until July 2022. This prevented any assessment or comparison until this point. Their data has no plans showing the locations of the habitats that form the BNG assessment.

2.6 Loss of Trees. SPC has significant concerns the lack of information regarding trees. This includes but is not limited to:

- No proposed site plan with the tree locations plotted to show the relationship between the development and the retained trees (Root Protection Areas (RPA) and their proximity to the areas of construction) which should be included in a British Standard BS5837:2012 Trees in relation to design, demolition and construction – Recommendations (BS5837) report.
- Information submitted relies on estimates of tree diameters. No information indicating which trees or how many will be impacted/removed through this development so no assessment of the development impact on the existing vegetation can be assessed.
- There appears to be trees omitted from the landscape master plans relating to sites EC01 W01 and W03 and hedging omitted from EC01, EC02, E05, W01, W02, W06, W08, W10, W11 and W12.
- The landscape master plans have omitted to show some significant tree areas and hedges that would border the sites and could be impacted by the development and new planting such as those adjacent W03, W08, W15, EC04 and EC05.
- A point that was raised at the dDCO ISH - articles 36 and 37 of the dDCO (SEF_3.1_Draft Development Consent Order - Sunnica want the right to remove trees that obstruct the development...even if under TPO. WSC raised this concern and said they were opposed to this request. SPC are particularly concerned about the TPO trees on Chippenham Road.

Transport and Access

- 2.7 The submitted material is not considered to be acceptable by our local highway authorities and there are deficiencies in the highway-related provisions in the draft DCO. SPC support this view and is also concerned by the lack of details provided in respect of the site accesses and street works proposed to facilitate the scheme. The impact of the proposals on non-motorised users and users of the public rights of way network has been underplayed and no sustainable travel measures have been included, either for construction traffic or for the benefit of all road users. A local example here is the Chippenham rd that is regularly used by horses, as well as cyclists and joggers. The character and amenity of routes within the entire area will be irrevocably compromised by this scheme. Significant numbers of construction workers and HGV traffic during the construction phase will have the potential to substantially impact on the road networks around the district, particularly at peak travel times. This connected to existing business commuting time, local community travel and impacts on existing community stakeholders such as businesses and residents

Many road sections will not be fit for purpose. One such section is the proposed route which passes through Snailwell onto Fordham Road to the proposed site access of West Site B. Fordham Road and thus Snailwell are protected for environmental reasons by specifically banning commercial traffic above 7.5 tons from using this route. The schemes requirements are not compatible with this section of road.

Community Impacts

- 2.8 Luke Murray has stated that there is no obligation to mitigate or compensate the communities as a result of this scheme. A project of the scale will radically change the sense of place, the place attachment of the residents, and the recreational amenities of the affected villages and communities, for over 43 years. The ES does not recognise this and has significantly under played the detrimental impact this scheme will create. How can such a project not have a mandate to mitigate/compensate for the substantial impact it will have. There is no local benefit whatsoever with this scheme.
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Extent of battery storage proposed

2.9 The scheme has a total of 31ha of BESS, of which significant portions are close to local communities. This is a particularly acute issue at Sunnica West A. The proposer has made the statement in their application that one or more BESS will be placed in these 31 ha. This area is obviously far greater than that required for one BESS. SPC is of the view that the magnitude of BESS development can remain variable and undefined, even after grant of a development consent order. This vagueness renders any accurate assessment of total carbon emissions, environmental and landscape impacts, transportation impacts to be carried out. Not to mention the threat from well documented battery failures and thermal runaway. SPC believes that every solar panel and battery will require removal and replacement during the scheme lifetime. The solar panels may last 25 years but their output degrades significantly with age. The battery capacity reduces as a function of frequency and depth of cycles resulting in a projected replacement within 10 to 15 years. The cumulative carbon emissions from replacement of equipment over the scheme lifetime needs to be quantified independently to verify Sunnica's carbon reducing claim. Otherwise the aim of the scheme in meeting the UK's Net Zero targets is questionable

2.10 With specific regard to BESS. We note the following statement by email from the applicant in a their opening email to SPC regarding an SOCG between Sunnica and SPC, was "the Scheme's impact according to the 'Rochdale Envelope' method of the maximum parameters or impact, meaning that a worst-case scenario for the impacts of the Scheme has been assessed in the Environmental Statement [APP-032 to APP-259]. The BESS capacity is not relevant to this assessment as the maximum parameters have been assessed (being the maximum footprint of a BESS facility along with height parameters)".

SPC has determined that the worst case scenario for the impacts of the Scheme cannot be defined unless BESS capacity, installation density, separation, barrier design and battery type is stated. It is not in agreement that the BESS capacity or all of the required details above is not relevant to this assessment. Simply stating the maximum parameters of footprint and height is at the very least obfuscation and at worst negligent. Legislation and robust industry standards were introduced many years ago, to ban and then legislate how Lithium batteries are transported by aircraft after a pallet was accidentally dropped during loading, causing a catastrophic thermal runaway fire. No handling and transport protocols have been promulgated by Sunnica, which is a significant risk. In fact, there is a distinct absence of any preventative measures to minimise the risk of battery fires in the application. This is a serious flaw.

Because of the safety issues related to transporting, handling, installation, operation, replacement, decommissioning and recycling of lithium batteries and tackling emergencies such as thermal runaways producing toxic chemicals, fire and explosions, we believe there is a significant risk to our communities, firefighters and the environment and therefore the SPC does not agree that such a significant matter can be hidden within the Rochdale Envelope.

Alternative Locations

2.11

The scheme has not detailed any alternative locations, which SPC believe there is evidently a myriad of options, a pre requisite for the application. Sunnica have only detailed their proposal connected to the Burwell substation. It appears to have contradicted its own parameters for selection of low grade land and ignored gradient and slope and impact on Heritage assets like Chippenham Park.

Noise and vibration

2.12

A) Construction Phase Noise

SPC has concerns related to construction phase noise for two years, especially as the Snailwell Short Rd is being proposed as an access route for the scheme as discussed previously-. The hours of work during construction phases are proposed to be between 0700 -1900 Mon – Sat and will have a significant adverse effect to our parish and surrounding communities. The Jockey Club, which manages the local Newmarket equestrian exercise areas such as The Limekilns and the Gallops and all routes to it, prevent any usage of their land to other than for equestrian purposes prior to 1300 every day. This preserves the unique safe environment essential to what is known throughout the world as the International Home of Horse Racing. This means that the two privately owned stables, Plantation Stud and Snailwell Stud and the British Racing School which are in the Snailwell parish, and are associated with the racing industry, use this protected time to train and exercise their horses. The Godolphin Gallops which run parallel to the bridleway W204/5 is within our Parish and is likely to be adversely affected by this scheme. Pile driving and construction work related activity and noise is not compatible with this multi million pound industry which is rooted in Newmarket and the

surrounding areas. The international horse racing industry relies upon Newmarket as a centre of excellence and the surrounding community rely upon it for their livelihoods.

B) Operational Phase Noise

The impact of low frequency hum from the proposed equipment and plant will likely have cumulative interactions from low frequency sources from multiple pieces of equipment which needs to be quantified and assessed by an independent, qualified Acoustic Engineers once detailed specifications of type and numbers of equipment have been provided by the applicant. Until such time, assessments of noise impact cannot be made

An area of concern is specifically, low frequency 'hums' from transformers. These are prevalent on existing substations, which are a matter of concern for people living in proximity to such sites. Sunnica is proposing to install the equivalent of three substations within their scheme at two different locations with grid scale transformers and shunt reactors. Low frequency sounds vary in their audibility due to temperature, humidity and wind conditions and/or the number of transformers operating at any one time, or the loading on the transformers themselves. Reports from persons affected by low frequency sounds generally suggest it can have a significant detrimental effect on their wellbeing. The lack of clarity relating to equipment size, type and usage prevents any assessment of this issue of cumulative effect on low frequency noise levels emanating from the proposed locations on West Site B and other proposed sites.

An issue with construction projects of this size and scale which involves piling is the noise and vibration. The repetitive nature of the activity and the potential longevity of build and the long days declared are a significant cause for concern. We know that it was a particular issue in Burwell during piling activities to drive in posts for the solar arrays. Comments from local residents there including Mrs Hones, who lives close to the solar farm on [REDACTED] commented that she couldn't use her garden for the entire summer construction period because of the constant and loud drilling and piling.

Piling down to 12m has been stated below the battery sites far deeper than solar panel supports. The submission to date does not provide suitable reassurance that the activity of extensive and widespread piling will not adverse impact.

We have no accurate assessment noise or vibration data created by drilling or 'no dig' cable routing as the size and length and equipment has not been specified.

Flood Risk, Drainage and Water Resources

2.13

Due to the proximity of the scheme to Snailwell Poor Fen, Chippenham Fen and the effects of potential change to current drainage into the unique and fragile fenland biosphere and the overlay of the scheme with apparent complete under estimation of the quantity of water and no consideration of the effect to the ground water source protection zone including the Cam and Ely Ouse chalk ground water area if contaminated by run off from water used to fight a thermal runaway of any significant scale resulting in contamination with toxins such as Hydrogen Fluoride (HF)in vast quantities and the Hydrochloric Acid and Fluorides created when water is combined with HF when used to fight fires in a thermal runaway event. The run off figures mentioned by Sunnica are significantly less and not representative of actual amounts documented in events recorded around the globe.

The delivery of water and the quantities are equally and significantly less than documented in multiple well documented events recorded around the globe.

If contaminated water from runoff or changes to the hydrology occur due to the construction and operational effects of the scheme it could have significant impact on unique and rare and protected species only found in this area in and around several SSSI and Ramsar sites like Chippenham Fen and Snailwell Meadows. These species include amongst others, a nearly exclusive habitat of a plant protected under Section 8. There is little evidence that an alternative habitat could sustain this species. Any disruption or change to the habitat poses a significant risk to the species *Selinum carvifolia*. The Sunnica scheme bisects two documented areas of habitation. Also not mentioned in Sunnicas report is the elusive and once thought extinct spider, the Rosser's sac-spider (*Clubiona rosserae*) which is dependent on it fenland habitat in and around Chippenham Fen.

Decommissioning Phase

2.14

Very little detail has been forthcoming with regard to decommissioning other than a fund will start accumulate after year 10. This project will be built over a period of two years. There will be significant financial and ecological exposure should the project fail, from the moment the construction phase commences. Further information relating to predicted timescale, daily activity, plant, equipment, traffic, air quality and noise, need to be provided in detail. Matters including the vast amount chalk used to cover large areas of land, as a consequence of mitigation proposals, be returned to its original location? Secured and ring fenced funding, similar to the directives mandated in Offshore Wind

Installations- ARUO (2018) must be lodged at the commencement of the project to protect the region and prevent financial exposure to this project. Otherwise there is a risk of significant harm and blight to the local communities, environment and the horse racing industry, even after the end of the project lifetime. This funding requirement prior to construction, should be part of the DCO for schemes of this size and scale.

Air Quality

2.15

The project has proposed ground work including moving substantial amounts of chalk. We request more details be provided relating to mitigation and predictions of worst case Air Quality, dust and light in all phases from construction to decommissioning. There is currently insufficient detail.