

From: [REDACTED]
To: [Sunnica Energy Farm](#)
Cc: [REDACTED]
Subject: IP 20030127 AND THE SUNNICA ENERGY FARM APPLICATION EN010106
Date: 28 November 2022 13:41:16

Dear Examination Team,

I have led Reach Parish Council's engagement with the Examination of the Sunnica application. However the comments on written representations below are supplied in a personal capacity only because the tight deadline for submission of such comments precluded the Parish Council from meeting to discuss and agree a collective submission. However, based on previous discussions of the Sunnica Application at Parish Council meetings, I do not believe that other councillors would find my comments contentious.

I note in the written representations a broad consensus in grounds for objecting to Sunnica's application. This despite the broad geographical and functional spread of Interested Parties. Furthermore I consider that many of the cases for objection support, sometimes explicitly, Reach Parish Council's case for rejecting Option 2 as the site for transformers and associated infrastructure required to enable electricity from its scheme to be taken into the National Grid.

In particular I note Cambridgeshire County Council's (CCC's) concerns, in REP2-112, that the site for Option 2 has not been evaluated archeologically (para 2.14) and that Sunnica's assessment of the loss of land for food production (para 5.4) is inadequate. Reach PC understands that the land that would be lost under Option 2 consists of Grade 2 soils. I also note CCC's view that 'the applicant has not adequately assessed the impact of the development on users of public rights of way (PROW) as visual receptors in the landscape' (para 7.2). The latter is an especially important omission in the context of Option 2 given that many of the PROWs that surround the site are well used and elevated above the proposed Option 2 site, for example the banks of Reach and Burwell Lodes and on the Devil's Dyke SSSI, which amplifies the visual intrusion of the proposal.

I also note, in the objection of East Cambridgeshire District Council (ECDC) (REP2-131 para 3), a judgement that the applicant has failed to comply with chapters 4.5 and 5.9.8 of NPS EN-1 and chapter 2.51 of draft NPS EN-3, as evidenced in the inadequacies of the applicant's landscape appraisal and proposed mitigations. I also note and concur with ECDC's assessment that 'the detrimental harm to the long term landscape would not be outweighed by the benefit of renewable energy'

There is much in the representation of Say No to Sunnica (SNTS) (REP2-240), especially in chapter 3 on Landscape and Visual Impact, that I consider to be consistent with and indeed to build on Reach PC's objections to Option 2. The germane points are:

- the SNTS landscape architect's view that the applicants have failed to consider and give sufficient weight to the loss of openness (para 3.1.3) and concerns that mitigation planting will restrict open views (para 3.1.2) the inadequate assessment of the visual impact of substations (para 3.1.6) and proposed mitigations and thus non-compliance with NPS EN-3 (Para 6.1.5)
- concerns about loss, without justification, of high quality productive agricultural land (chapter 5)
- harm to local residents (chapter 8) and

- the impact on recreation (chapter 10) primarily through the industrialisation of the loss of rural setting of homes within the proposed scheme (para 8.1.12)

At 16.1.33 of its representation, STNS puts forward a strong case that, under UK Planning Policy and Law, the choice of site for the proposed scheme was inadequate, that 'no weight can..be given to the availability of grid connection at Burwell as a criterion for site connection' and that the applicant has failed to demonstrate consideration of alternative sites (para 16.1.37). In light of this SNTS concludes that the case for Compulsory Acquisition of the Option 2 site cannot proceed as the applicant has not demonstrated that there are no reasonable alternatives for grid connection (para 19.1.7). This is an argument that I strongly support.

Finally I see common cause with the submission of Chippenham Parish Council (REP2-115) in its concern about the cumulative effects of the many elements of Sunnica's proposal and the loss of views and the industrialisation of the countryside that would result from this scheme.

Looking at the application more strategically, many Interested Parties share Reach PC's concerns about the risks to local residents, to wildlife and to the emergency services arising from the Battery Energy Storage System proposed as part of Sunnica's scheme . These include CCC (REP2-112, para 3.6) and ECDC (REP2-131, chapter 8). SNTS's views on the necessity of BESS (chapter 13) and the associated issue of environmental and health and safety risks of the proposed BESS solution also chime with the concerns of Reach PC. Having read SNTS' submission I cannot consider the BESS element of Sunnica's application to be an 'associated development'.

A number of interested Parties share Reach PC's scepticism about the green credentials of this application. As mentioned previously, ECDC assesses that the harm to the local landscape of Sunnica's proposal outweighs the benefit of the renewable energy that it might supply and SNTS's representation (chapter 12) adduces evidence in the form of the Cranfield Report which I consider credibly underpins its assessment that the scheme will produce more carbon than it saves over its lifetime compared to the grid over the same period.

In conclusion I consider that the combined argumentation of the written representations makes a compelling case both for rejecting the scheme in entirety and, as a linked subsidiary point, for rejecting Option 2 as the site for connection to the National Grid.

Yours sincerely,

Nick Acklam
Vice Chair, Reach Parish Council