

From: Peter Goodyear [REDACTED]
Sent: 07 December 2022 07:57
To: Sunnica Energy Farm [REDACTED]
Cc: [REDACTED]
Subject: Planning Inspectorate Reference EN010106 Registered party 20030564 Fordham (Cambs) Walking Group, Sunnica Energy Farm,

Dear Planning Inspectorate team,

I am writing in advance of tomorrow's Issue Specific Hearing, to provide an update for item 6b Permissive Paths ISH3 Thursday 8 December 2022.

This may be pertinent to any ExA questions considering that I am not personally registered to speak but will be in attendance.

In relation to the email below sent in response to the accompanied site inspection on 3 November 2022, there has been no response from Sunnica except acknowledgement that the communication has been received and will be responded to.

Whilst there has been no substantive response to my email, I note Sunnica's responses to written representations REP2-137 Deadline 3A Submission - 8.50 Applicant's Response to Written Representations - 12 responses. I feel obliged to provide clarification because our group's objection relates principally to the absence of adequate permissive routes during the operational phase of 40 years. I apologise if this was not clear. Sunnica's responses refers to their assessment of the existing PRoWs and need for mitigation during the construction phase not operational. That is not something I raised in any detail and our proposal is for longer term sustainable benefits for our local communities over the full operational phase of 40 years.

Kind regards
Peter Goodyear
(Fordham Cambs Walking Group)

On Fri, Nov 4, 2022 at 11:42 AM Peter Goodyear [REDACTED] wrote:

FAO Luke Murray Project Director.
Good morning Luke,

Thank you for accommodating me as representative of the Fordham Walking Group on the Inspectorate's accompanied site visit yesterday 3rd November.

You may recall responding to some of my questions, but you asked me to put one specific factual question in writing, for you to respond in a considered way.

You explained that you are currently in discussions with landowners with a view to reaching

agreement for the cabling route. My question was ***“Is there any reason why these discussions cannot include the creation of permissive footpaths or bridleways along the cabling route?”***.

Please find attached your drawing number 60589004_ES_DAS_004 Rev 0 upon which I have overlaid in green sections within the DCO (P2-P8) that I feel warrant scoping, and a short section outside the DCO (P1) linking to East Fen Road Isleham. Whilst the latter section is outside the DCO, I understand the land is in the same ownership as adjoining land where you are having discussions.

My representation and written statement (in preparation) seek to draw attention to the need for a comprehensive look at the wider network of routes for pedestrians, cyclists, and horse riders in the area. There are missing links considering availability of attractive linear and circular routes. Since it is the case that non-vehicular users favour safe, attractive, PROWs and class C or unclassified roads; it would assist consideration of this issue if you were to generate a drawing highlighting these and your “potential” permissive routes. I guess that would simply involve a matter of switching on layers in your CAD system.

On your PROW map, the roads and settlements are greyed out, and the permissive routes are not shown on drawing 60589004_ES_LSP_004 Rev 0. This means it is extremely difficult to extrapolate how the network works and in places fails. It is possible that I have missed something in the volume of submitted material and I’d be grateful if you could point that out if that is the case. I have done my own mapping showing a lattice of existing and potentially beneficial new permissive routes, but I am unable to share this with the inquiry because my OS licence is a private one.

I see that in addition to our written statements, we are being asked to provide statements of common ground by 11th November. I am happy to cooperate if you want to offer suggestions. I find it easier to identify where we might have a difference of opinion.

The Fordham Cambs Walking Group (FCWG) includes members from neighbouring villages. Members have expressed strong concerns regarding the inadequacy of mitigation relating to permissive routes. Other significant concerns have been expressed regarding temporary loss of routes during construction, fire safety, countryside character ecology, and loss of productive farmland. Also, people are feeling threatened with a strongly perceived isolation of village communities as a result of the sheer amount of panels and associated structures proposed over such wide area. It is also fair to say that most members are supportive of the principle of carbon reductions through renewable energy projects. The issues are around the how much, what, and where, together with reference to community impacts and lack of adequate mitigation.

FCWG members have group activities and share individual routes in the area. There is consensus that walking and cycling routes in our area are currently inadequate. The National Cycle Network from Cambridge only comes as far as Burwell. There are villages which are isolated for walkers insofar as the next village is only accessible along roads without footpaths. Where a PROW exists, it is often a far from direct route. In other cases, there is no attractive safe circular route available, which discourages wellbeing walking. I would agree that your “potential” permissive routes provide some beneficial mitigation but

this is very small in relation to the scale of the project. You might clarify what is meant by “potential” and the possibility, implied by the use of that word, that such mitigation may not be provided at all.

Regarding the guiding policies, the Sunnica Planning Statement [EN010106/APP/7.2] details the Scheme’s compliance with the relevant planning policy framework, at national and local levels, and other matters which the Applicant considers are important and relevant to the Secretary of State’s decision. Appendix B of the Planning Statement provides a table detailing the Scheme’s compliance with specific national and local planning policies considered relevant. Applicant’s Planning Statement Para 5.2.9 states “It should be noted that the NPPF was written to guide planning applications under the Town and Country Planning Act 1990 (TCPA 1990) rather than the PA 2008. At paragraph 5 the NPPF makes it clear that the document does not contain specific policies for NSIPs and that applications in relation to NSIPs are to be determined in accordance with the decision making framework set out in the PA 2008 and relevant NPSs, as well as any other matters that are considered both important and relevant. However, the Energy NPSs were published in 2011 and the NPPF, having been updated in July 2021, therefore provides more up to date policy. Its policies relating to specific topics relevant to the Scheme, and where these supersede the NPS policies, are therefore considered important and relevant”.

The Sunnica analysis omits specific reference to the NPPF policies relevant to walking and cycling, nor analyse in detail, nor respond to, the specific policy requirements of the NPPF and the development plan documents.

I might draw your attention to the following and invite comment:

NPPF

Section 8 “Promoting healthy and safe communities

Para 92. Planning policies and decisions should aim to achieve healthy, inclusive and safe places which: a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages; b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.”

Section 9. “Promoting sustainable transport

Para 104. Transport issues should be considered from the earliest stages of plan-making and development proposals, so that: a) the potential impacts of development on transport networks can be addressed; b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated; c) opportunities to promote walking, cycling and public transport use are identified and

pursued;”

Para 112. “Within this context, applications for development should: a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;

b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;

c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;”

Luke, I appreciate that you and your team have a lot to cover in a short time with the forthcoming Inquiry, particularly the deadline for written statements which is only one week away. I am on standby to enter early dialogue on the issues I’m raising.

I have copied in the Inspectorate for information as it relates to a question raised at the accompanied site inspection.

Kind regards

Peter Goodyear

(Fordham Cambs Walking Group)

Attachment

