

**From:** [REDACTED]  
**To:** [Sunnica Energy Farm](#)  
**Subject:** Sunnica Scheme No EN010106 Deadline 8 Submission  
**Date:** 13 March 2023 11:12:01

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Dear Sirs

## **Scheme No EN010106**

### **Deadline 8 Submission**

The Parish & Town Councils' Alliance (The Alliance) would like to comment as follows:

#### **1. Agriculture**

We are aware of the Joint Councils REP7-095 promoting a Rochdale Envelope approach to resolving the dispute between Say No To Sunnica (SNTS) and Sunnica in relation to the amount of Best and Most Versatile (BMV) land within the scheme site. As we have previously written, in our opinion the Applicant's report APP-115 - which states that less than 4% of the whole site is BMV - is incorrect. We find it even more surprising that the applicant has surveyed 924ha of the site and found less than 1% BMV.

Our opinion is based on:

- The applicant and/or Landowners have not allowed SNTS on the site to verify the conclusions of APP-115 jointly with them. We know that SNTS have been turned down on four occasions. We think this would be the logical way to solve any dispute. The fact that this has not happened is of concern.
- The conclusions of APP-115 are not consistent with the indicative and detailed soil mapping of the area. This is irregular.
- We have read the concerns that have been highlighted about the methodology used in the preparation of APP-115. We cannot see how the report can come to a reliable conclusion with so many anomalies in the processes of getting and presenting the evidence.
- We are locals - we see what grows in the fields every year and we do not recognise the description of the land in APP-115.

A solution to this problem has to be found as the potential loss of BMV if this is not resolved could be as much as 940ha

#### **2. Carbon**

Figures presented in the PEIR and examined by Cranfield University showed that when a full carbon lifecycle is done on the scheme it produced more carbon than it saved during its lifetime. These figures were then amended for publication in the DCO documents and again in REP-036.

The scenarios presented show that in terms of carbon saving it would be better to charge the batteries directly from the grid rather than from the solar panels. Requests from Cranfield for further information have been denied by the applicant. Without this clarity, it is impossible to determine whether all elements such as fencing, the trenching and tunnel boring, and electrical losses along the 16 miles of cabling, have been accounted for.

The applicant does disclose that the batteries will only operate at around 85% efficiency but again it is unclear whether those losses have been factored into the lifetime carbon analysis. The use of Gas turbines with the highest emissions as comparators suggests that, as the grid becomes greener and emissions decrease, the applicant is not entirely confident in their assertion that the scheme will save carbon.

The applicant must be asked to provide correct and final figures for Cranfield to analyse.

### **3. Size and Scale**

Even with the removal of Sunnica West B, the Sunnica scheme remains disproportionately large. The sprawling nature of the scheme causes harm that can never be mitigated. 40 years is a lifetime. Sunnica will not sit within the landscape it will become the landscape – an industrialised one.

### **4. Battery Energy Storage**

The scale of the BESS is unprecedented at 2,400 mwh. The applicant has been unable to demonstrate that the BESS are not a major safety hazard as continually demonstrated by fires and explosions worldwide. These points have been submitted by Dr Fordham and need to be resolved.

### **5. Heritage, Ecology and Landscape**

We are aware of significant concerns and outstanding matters relating to Heritage, Ecology and Landscape which will be reported to you in detail at Deadline 8 by experts working for the Alliance and SNTS. We will not repeat these here but support the issues raised and would like to see a conclusion to them.

We would be grateful if matters in points 1 to 5 above are considered and concluded before the closure of the examination process.

Yours faithfully

Fiona Maxwell

Chairman, The Parish & Town Councils' Alliance

Interested Party Number: 20031117

**Fiona Maxwell**

**Chairman**

Chippenham Parish Council

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The Alliance Represents the following Parish and Town Councils: Chippenham, Fordham, Freckenham, Exning, Isleham, Kennett, Mildenhall, Newmarket, Reach, Red Lodge, Snailwell, West Row, Worlington.