

From: [Alan Richardson](#)
To: [Sunnica Energy Farm](#)
Subject: Secretary of State invitation to Interested Parties to comment on the information provided in response to his request for information dated 27 July 2023.
Date: 28 August 2023 10:53:10

Dear Sir

I am interested party Alan Richardson reference 20030381.

My comments on the applicant's submission are:

The applicant has been rather typically evasive in its responses, continuing its behaviour during the consultation and examination.

Deed of Obligation

The important observation on Sunnica's response is that the Deed of Obligation is still under negotiation so no obligations exist.

Battery Energy Storage System and Hazardous Substance Consent

Sunnica's stated position remains one of ignoring the substantive issues. It is a fact that Battery Energy Storage Systems have been the subject of well documented major adverse events including fatalities. An experienced and competent supplier would have wanted to retire these risks by convincing detailed design early in the process. A completely inexperienced supplier (as Sunnica is) had the opportunity to demonstrate its competence by responding to the issue scientifically. Instead Sunnica continues to argue that we should trust them to address the issue later when they have no track record to base any such faith on. It is hard to choose between whether their response is the naïve response of someone with no competence in the issues or the evasive response of an organisation seeking permission to have the discretion to trade-off safety against profit.

Sunnica only disclosed the size of the proposed battery, some 2.4GW hour in the very last stages of the examination. This represents by far the biggest grid scale battery ever suggested and the idea that this doesn't pose unique safety issues would be laughable if the risks were not so serious. The benefits for taking these unique safety risks are very small as the battery capacity represents only four hours storage of peak generation (around 0.1% of annual generation). Why does their offer include this facility when it offers such inconsequential load balancing? It is entirely for commercial reasons in that it greatly enhances the revenues from the solar farm and these revenues are vastly more important to Sunnica than safety concerns. Sunnica have been advised many times that hazardous substance consent will likely be needed, not least by Dr Edmund Fordham in the examination process.

Side Agreement with the Local Highways Authority

The agreements are not completed so there are no obligations.

Glint and Glare

The applicant appeals to the mitigation provided by planting it will undertake. However, when questioned the planned planting was of saplings that would take decades to actually provide shielding from glint and glare so for many years no mitigation will be provided.

Best regards

Alan Richardson