



HOUSE OF COMMONS

LONDON SW1A 0AA

Claire Coutinho MP
Secretary of State for Energy Security and Net Zero
1 Victoria Street
Westminster
London
SW1E 5ND

11 September 2023

Dear Secretary of State,

Planning Inspectorate Scheme Ref: EN010106

We are writing to you about the Nationally Significant Infrastructure Project application, 'Sunnica Energy Farm', which has recently been under examination by the National Planning Inspectorate and in response to a request for further information following additional submissions from Sunnica.

The Sunnica Energy Farm is strongly opposed by local people. In a survey carried out in the affected East Cambridgeshire villages, between 85%-95% of residents in every village opposed the scheme, despite being in favour of increasing our output of renewables more generally. Likewise, we are both strongly opposed to this specific scheme, despite our general support for solar as a means of achieving greater energy security and meeting our national net zero target.

The local action group, 'Say No to Sunnica' (SNTS), has raised concerns about a number of issues during the examination, including the way the examination has been carried out. We share their concerns. We have outlined them below:

Battery Energy Storage Systems (BESS)

We understand the Sunnica Energy Farm is due to store 2400 MWh of battery energy in close proximity to communities in our constituencies, which we and local residents find troubling given the historic safety issues associated with the technology. Moreover, enough information has not been made available during the examination stage for the Planning Inspectorate to properly examine the risks. For instance, the applicant decided not to pursue the 'Hazardous Substances Consent' process, and the applicant failed to disclose the capacity of BESS until the examination stage of the process, precluding proper scrutiny from statutory consultees and other relevant interested parties at earlier stages of the process.

Agricultural Land Classification

We have written to your predecessor and the Planning Inspectorate about the issue of land quality at the proposed site, and wish to now clarify why we remain concerned about this:

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London: [REDACTED]

Suffolk: [REDACTED]



Refusal of access

Sunnica has stated that less than 1% Best and Most Versatile (BMV) agricultural land exists on the 924 hectares of land they surveyed, which is significantly less than other independent evidence on this point.

In light of this, SNTS has consistently sought access to resurvey the Sunnica site with an independent soil consultant, evidence from neighbouring land, and other available data, but they have been denied.

SNTS used independent professionals Patrick Stephenson Ltd Agricultural Consultants and Sam Franklin. Their findings show that neighbouring land produces a range of high-yield crops consistent with BMV soils and therefore directly challenge the conclusions and accuracy of Sunnica's report.

Reliability of Predictive Maps and ALC Mapping

Natural England's (NE) own predictive map and ALC mapping shows that over 50% of the Sunnica site is "best-and-most-versatile" land. While SNTS accepts that these sources are not definitive, they are, however, based on the best available information.

Moreover, it is concerning that there is a significant discrepancy between Sunnica's report and four soil experts, neighbouring farmers, and the NE predictive plan. As it stands, neither DBSC, Sunnica nor NE have given any explanation for the difference in the findings, which suggests that Sunnica's report has ignored significant evidence that contradicts its findings.

Lack of Engagement from Natural England

Furthermore, NE has not engaged with SNTS or their professional advisors at any level. NE has also not provided any explanation for their satisfaction with DBSC's report, their total disregard for their own predictive plan, and all the evidence that contradicts the conclusions of the DBSC report.

Importance of Soil Series

The failure to include soil series mapping in Sunnica's report raises further doubts about the accuracy of their assessment. With such discrepancies between Sunnica's report and NE predictive mapping, soil series mapping could have been used to back up the findings.

In light of the above, we believe that no definitive finding of the quality of the land can be made until an independent on-site investigation is carried out.

Importance of Food Security

We would highlight the Government's position, expressed during Prime Minister's Questions on September 6, 2023, which recognised the need to build solar in a way that "protects our most valuable agricultural land so that they can produce food for the nation and increase our food security". That is why the planning system now expresses a clear preference for brownfield sites.



Stone Curlews

NE has stated to our constituents that there is no "functional linkage" between the population of stone curlews using the land affected by the Sunnica proposal and that of the Breckland Special Protection Area. However, they have made this contested statement without any accompanying evidence. Given the value of these birds and the need for accurate scientific evidence in an NSIP ruling, we felt it necessary to make you aware of this.

Isleham Bomber Plane Crash Site

The Isleham Bomber Plane Crash site is an important heritage site in the village of Isleham, considered by many residents as a war grave that should be maintained as it is in memory of those killed. You will see that the Joint Casualty and Compassionate Centre has granted the applicant a licence to proceed with the development here if successful, however we felt it important to point out that their remit does not involve ruling on archaeological, heritage or community value.

Newmarket Racing Industry

The racing industry is a significant employer in the area and Newmarket relies on its position as one of the elite racing centres of the world for domestic and foreign direct investment. If the racing site, including the famous Limekilns gallops, are to be surrounded by solar panels, we share the concern of our constituents that wealthy owners could relocate elsewhere, affecting local jobs and prosperity.

We trust that you will consider these points when evaluating the proposed solar farm and battery storage facility in our constituencies. The protection of our agricultural land and the concerns raised by the local community should be crucial in this decision-making process. We both oppose this application.

Thank you for your attention to this matter.

Yours sincerely

Rt Hon Matt Hancock MP

Rt Hon Lucy Frazer MP