

Comment on Replies to PINS letters of July 27th from Interested Party ID:11564

Ref: Natural England

I am appalled at the response from Natural England, a tax-payer-funded public body mandated to protect the environment and to be an independent guardian of our countryside. Their cursory reply that they have no public availability of information, nor a timescale for such an answer is beyond incompetent. I believe alternative expert evidence has been provided that links the nesting distances to stone curlew populations within SPA limits and requires a greater independent investigation. It is a reflection of the way they have been biased towards the developer throughout this examination.

I also have grave concerns about evidence of bird populations based on RSPB data. As stated verbally at the public hearing in Newmarket in December, Aecom on behalf of Sunnica, admitted that they had been maintaining the statistics across the area as a favour to the charity RSPB throughout the COVID period; presenting this data as fact is therefore opaque at best and manipulated in favour of the applicant at worst.

On the soil analysis that the Ex. Authority has not demanded an independent soil analysis and relied on Natural England, which is further biased. Sufficient external expert evidence has been provided via SNTS on the quality of soil and crop production across the area which is 50% BMV land. Sunnica has not disclosed their sampling sites, and landowners have signed NDAs and will not provide access – the Ex. A should appoint an independent consultant and the developer should fund this given the huge discrepancies raised and questions left unanswered. We the community see the benefit and range of crops every season and know first-hand what occurs on this fertile, irrigated soil and the investment of many local farmers.

Ref: BESS

Sunnica's BESS rationale is again inadequate drawing on two other large-scale DCOs consented to in 2020 & 2023. The Sunnica proposal is different in siting, grid voltage connection and overall scale, its piecemeal design has a far greater cumulative impact on people and landscape. One can't approve one bad plan based on acceptance of something different in a different setting.

I object to this strongly - Alok Sharma Sec of State BEIS in responding to the Cleeve Hill decision (The UK's first mega BESS) in 2020 highlighted there was no adequate regulation at the time. Sunnica's argument is attempting to use this still-remaining policy void as a precedent.

Thermal runaway is well acknowledged within the industry and Fire Services. In three years since the Cleeve Hill decision there have been many more fires and explosions around the world; warehouses of batteries, EV vehicles banned from shipping vessels, our Fire services have proven they cannot cope with tiny lithium fires in EVs and waste sites – this scheme is a Grenfell disaster waiting to happen. As a Deputy Chief London Fire officer said in the

investigation of BESS in Ireland “I would not want to stand in court and have to say I knew about this beforehand”.

Likewise, the reference to COMAH regulation – ‘only if it becomes necessary’ - Sunnica has been clear that they will sell on this site at the earliest opportunity and there is a risk that compliance ‘along the way’ will be lost in construction. Or will allow other constructors/operators to move the goalposts, leaving those ‘human receptors’ most impacted powerless and local authorities footing the costs of compliance supervision.

Maria Miller MP has raised the need to ensure considerable safe distances from communities for BESS storage and compliance with COMAH regulation, while Hampshire's Chief Fire Officer, Neil Odin, is on recent record saying his crews would face an "impossible choice" between protecting the community from a potential toxic or explosive gas plume or applying water that would pollute local waterways for years. The Sunnica location design places certain villages at twice or three times the risk, and for Red Lodge, there is only 1200 meters from a primary school. Centuries of racing bloodstock lines could be wiped out.

Police Forces are now calling to combat the serious increase in solar establishment crime. Sunnica’s plan currently includes approx. 35 miles of 2m deer fencing which will inevitably industrialise the area, but now law enforcement is recommending security fencing, CCTV and lighting. This vast scheme will subject people to living in an industrial compound with light pollution and intrusion to privacy and liberty. Not to mention the theft of essential operating cables and high voltage danger now the power plants are rated at 400KW on site. How has Sunnica been challenged on this emerging issue?

STOP Sunnica now, evidence shows:

- Vast discrepancies in expert soil analysis, and the potential loss of a high food production area.
- Evidence from Cranfield University shows that this scheme will never be carbon neutral.
- Lack of effective regulation on what will be the UK’s largest BESS to date, poor input from Fire Services as the design is still subject to being disclosed!
- There are better alternatives - Rishi Sunak stated in PMQs just this Weds 6th September that brownfield and rooftops should take precedence over farmland. And the need to protect our most valuable land for food production.
- Sunnica’s credibility on poor consultation, lack of expertise, the quality of application and still lack of information inspires no confidence in their stated ability to deliver this scheme, their incompetence should not be awarded tax-payer funded finance. ‘Suffolk County Council calls this the worst NSIP application they have ever seen’.