

Dear Sirs

Scheme Nos EN01010
Sunnica
Interested Party ref:20031117

I write on behalf of the Councils listed below and comment as follows on the letter submitted by Pinsent Mason 10th August 2023, and using their numbering:

1. Battery Energy Storage System Design and Hazardous Substance Consent

The Alliance fully supports the following statement:

We remain of the opinion expressed amply in Examination and by Dr Edmund Fordham that there is a critical absence of detail in respect of the design of the Battery Energy Storage System (BESS) and that the safety of these, after a number of incidents around the world, is not assured. Concern is mounting over Li Ion battery chemistry, thermal runaway in the event of damage, and the toxic emissions.

The BESS system proposed by Sunnica - at 2,400 MWh energy storage capacity - exceeds the capacity of the facility at Moss Landing, California, currently the largest in the world, by 50%. We would ask the Secretary of State to note that to date installations of this magnitude have been located in remote desert areas.

That previous installations have been consented is of no relevance, a decision to consent should be based on the facts and the information put before the Secretary of State. We argue that the SoS simply does not have enough information to consent a BESS installation of this size, in this location. It is clear that Hazardous Substances Consent (HSC) is required and there has been an abject failure by The Health and Safety Executive to engage with the risks that such installations present before they are consented.

It is not acceptable for the Applicant to simply defer this to a later stage. Your letter of 27 July makes it clear that you require the Applicant to determine which category it falls in and we support this. We suggest that if the applicant was able to say now that HSC was not required it would do so. This implies, as was imbued in Examination, that HSC is required.

3. Isleham Bomber Plane Crash

1) This site is important to our Parishes and Towns because of the close links we have with the USAF due to our proximity to the bases at Mildenhall and Lakenheath and the many Service Personnel who live in our communities. This site, an open, peaceful, agricultural field, should not be developed. This war grave is an important part of our local history and residents of Isleham feel forever indebted to the bravery of the crew who sacrificed their own lives to save the lives of those in the village.

2) We do not agree with the applicant that the crash site is limited to the primary impact crater. It is clear from reports at the time that the remains of crew and the

aircraft were scattered over a significant area. Isleham Parish Council has already provided our views on this in REP6-067 and REP8-046.

3) We understand that the JCCC's remit when considering licence applications is narrow and is mainly confined to the preservation of remains on military sites. The JCCC does not consider the harm caused by development of the site to the local landscape, the harm to local heritage or the ethical and moral considerations regarding development of a war grave. These considerations are for the Examining Authority and Secretary of State to consider and should be informed by the views of residents (as set out in Isleham Parish Council's above-mentioned submissions, the submissions of the Say No to Sunnica community action group and their highly regarded expert on heritage and the Isleham Society, a local heritage group (REP2-149).

7. Other Matters

The Sunnica site surrounds our Parishes and Towns. Every year we see the variety and quality of crops that the land produces. We therefore know that the soil report submitted by Sunnica is incorrect. In this productive area, it is not possible to survey 924 hectares and find less than 1% best and most versatile land [BMV]. Having read submissions on this matter during the Examination process we know that our position is confirmed by the following information:

1. Natural England's predictive mapping
2. The Agricultural Land Classification mapping
3. The detailed soil series mapping of 1:63,363 and 1:10,560
4. Four soil experts including a Fellow of the British Society of Soil Science
5. Sunnica's soil report does not comply with the British Society of Soil Science guidelines or the Government's document '*Guide to assessing development proposals on agricultural land*' 5/02/2021. This allows for Sunnica's conclusions to be incorrect. If the report had been done according to the guidelines it would have shown considerably more BMV than less than 1% on the site.
6. If Sunnica were confident of the soil report they submitted, they would have allowed access to the site for other surveys to take place. Despite three requests for access, this was always denied by Sunnica.

As has been the case throughout the examination, Sunnica fail to address the core issues in point 7. Why does their Soil Report vary so dramatically from all the established opinion and evidence? The Secretary of State is now being asked to decide on a scheme not knowing how much of it is BMV. All she will know for certain is that there is more than 1%. This is an impossible position to be put in and must lead to the application being refused. **You cannot guess BMV.**

It should be noted that Rishi Sunak, in response to a question at a public meeting on 27th July 2022 at the Heath Court Hotel Newmarket, categorically stated that ground mounted solar would not be allowed on productive arable land. In response to a question at Prime Minister's Questions on 6th September 2023, the Prime Minister confirmed that ground mounted solar **should not be on productive arable land**. The Sunnica site **is** productive arable land capable of producing over 34,000 tonnes

of vegetables and cereals per year; the equivalent farm in a cereal only rotation would produce 6,500 tonnes per year.

The Examination process has highlighted so many reasons why the sprawling industrializing Sunnica scheme should be refused. There must be better schemes to help us reach Net Zero.

Yours faithfully

Fiona Maxwell
Chairman, Parish & Town Council Alliance

The Parish & Town Council Alliance represents the following Councils:

Chippenham Parish Council

Exning Parish Council

Fordham Parish Council

Freckenham Parish Council

Isleham Parish Council

Kennett Parish Council

Mildenhall High Town Council

Newmarket Town Council

Reach Parish Council

Red Lodge Parish Council

Snailwell Parish Council

West Row Parish Council

Worlington Parish Council