

## **Response to the SoS's letter of 27 July 2023.**

### **BESS and Hazardous Substances Consent:**

The BESS is the most worrying aspect of the scheme given Lithium-Ion's propensity for spontaneous combustion and release of highly toxic gases; a responsible developer would have understood this and offered several scenarios based on possible outcomes. It is not acceptable for BESS designs to be produced only after DCO consent when it will be too late for residents to have any input.

Quoting precedent has been a tactic of Sunnica's legal team throughout the Examination. Reference to the precedent set by the Longfield BESS is irrelevant, precedents cannot be applied in all circumstances regardless of context. The discrete compact Longfield design involving relatively few dwellings with one BESS is substantially different from Sunnica's sprawling development impacting seven villages and two market towns with three mega BESS compounds. This scheme permanently industrialises a productive agricultural landscape, inhibiting any future development and effectively killing our communities (forty years is not temporary, it is a generation and beyond my life expectancy).

The Health and Safety Executive should have been involved from the start, anything capable of producing a hazardous substance like hydrogen fluoride during thermal runaway events needs thorough oversight, so there should be no question of the HSE's involvement. BESS should never be sited anywhere near residential areas, as demonstrated by the Liverpool fire in 2019. The HSE must be fully aware of Li-Ion's volatile nature as they have been conducting their own tests since 2021 [ [New battery abuse testing facilities at the HSE Science and Research Centre \(hsl.gov.uk\)](https://www.hsl.gov.uk/news/new-battery-abuse-testing-facilities-at-the-hse-science-and-research-centre)]. If this scheme is approved it will be like living on top of a powder keg. No one should be subject to the imposition of such sustained stress, least of all in a modern democracy,

Sunnica will deprive the nation of c.2,500 acres of productive farmland in exchange for a poorly designed scheme which Dr Fordham and other have convincingly calculated cannot possibly produce the 500MW of energy claimed; Cranfield University concluded it will never be carbon neutral in its 40-year lifetime as the carbon cost of panel manufacture and transport has not been factored in. Only China is currently capable of producing the vast numbers of panels this scheme will need but it would be unacceptable and immoral to use panels manufactured by Uyghur slave labour.

A simple question should elicit a simple response. Pinsent Mason's answer failed to provide it, their unnecessarily complex response, cross-referencing and with poorly presented plans, results in obfuscation and confusion not the clarity required; a practice with which we have become wearily familiar throughout the NSIP process, including the contemptuously

arrogant tone. What seems to be the real answer here is ‘we don’t know and can’t be bothered to find out’.

### **Soil Classification**

Despite their insistence that the majority of the soil within the scheme is not Best and Most Versatile (BMV) land this does not reflect what we see on the ground: on the contrary we see high yielding crops in almost all fields destined for the scheme apart from heathland [EC03], which one does not expect to be high yielding, nevertheless parts of the heath do produce crops, currently it is down to maize, and provides excellent habitat for Breckland wildlife without recourse to soil stripping.



*Fig. 1 Image from 2022 showing ECO2 at the top of Mortimer Lane, one of only four footpaths in Freckenham. This highly productive field regularly produces wheat and potatoes, in 2023 it is potatoes, but it will be taken out of production for Stone Curlew mitigation.*

It is telling that Sunnica refused numerous requests to allow STNS to conduct an independent soil assessment. If they were confident of the accuracy of their assessment there would have been no reason to withhold permission and the dispute could have been settled immediately. That they have resisted all requests suggest they do not have confidence that their assessment is correct. To settle this vital question I am surprised the Inspectorate did not order an independent analysis to be paid for by both parties.

Natural England's deplorable refusal to communicate with STNS while conducting advisory sessions with Sunnica is contrary to natural justice and to the spirit of fairness we were encouraged to expect of the NSIP process. As a government body one would expect Natural England to be bound by the same spirit of fairness.

The irony is that there does not need to be any conflict between farmland and solar, we need both and we could have both if the government supported the CPRE's campaign to put solar on roofs. There are several large empty warehouse roofs in Snailwell, in full view of agricultural land destined for solar [W03]. According to a 2022 report commissioned by the UK Warehousing Association there is sufficient roof space for up to 15GW of new solar power, which could double UK's solar capacity; reduce carbon emissions by 2 million tonnes/year; provide a more secure power supply; and enable the sector to become a net producer of green electricity. [As energy costs spiral, new report reveals that warehouse rooftops could double UK's current solar capacity and save billions | Logistics & Handling \(logisticshandling.com\)](#) Energy from warehouse roofs could be available in a fraction of the time before Sunnica's chaotic scheme is likely to be operational.

### **Isleham Crash Site**

Lack of meaningful consultation was another theme throughout the NSIP process which resulted in Sunnica's ignorance of the Isleham Plane Crash site or appreciation of its historic and emotional importance to the community and to the families of the men who died. Had Sunnica attended the public meeting at Isleham Village Hall to which they were invited by our local MPs, Lucy Frazer and Matt Hancock, they would have seen prominently displayed the plaque in commemoration of the crash. Sunnica's determination to include every possible acre into this scheme demonstrates a mean spirited lack of respect for the sacrifice made by these gallant airmen and an arrogant disregard for local cultural history.

### **Response to the SoS letter of 23 August.**

Plot 5-11 (U6006) forms the upper part of Badlingham Lane/Green Lane, leading to the Worlington entrance. U6006 is a much loved and popular routeway between Freckenham and Worlington, adopted as a road in the 1950 at the same time as Elms Road in Freckenham but has remained in its unmade-up state. It is regularly used by foot, horse, and two-wheeled traffic. It is of historic significance, recognised as an Undesignated Heritage Asset recorded on the County Historic Environment Record [WGN097, FRK214], believed to be a remnant of the ancient Icknield Way, and possibly a medieval pilgrim route to Walsingham and other holy shrines [Written Representation, 16/12/22].

The lane and verges covered by Plot 5-09 and the north-east section of Plot 5-07 [see plan overleaf] is a County Wildlife Site, having been identified as a site of rare Breckland plant

species, so presumably comes within the purview of Suffolk County Council. Plot 5-11 is an extension of the CWS and leads to the Worlington entrance of the lane.

Despite being a road, Sunnica has never acknowledged it as a 'highway within the scheme'. Even SCC are ambivalent about its status although they take responsibility for it as a footpath and bridleway, mowing it as necessary.

Our suspicions that Sunnica planned to use the lane for works traffic seemed to be confirmed by their original intention to close it for 24 months. In response to robust objections from locals and Suffolk County Council's acknowledgement that the lane was one of the best footpaths in the area, Sunnica reduced their original plans of 24 months closure to a maximum of 3 weeks (at a time) and to minimise any damage to the lane, its verges and protected trees by channelling two of the three cable corridors underground [5-10, 5-08], leaving only one physical crossing point [5-04] so it is unclear why Plot 5-11 would need to be in the ownership or control of Sunnica.

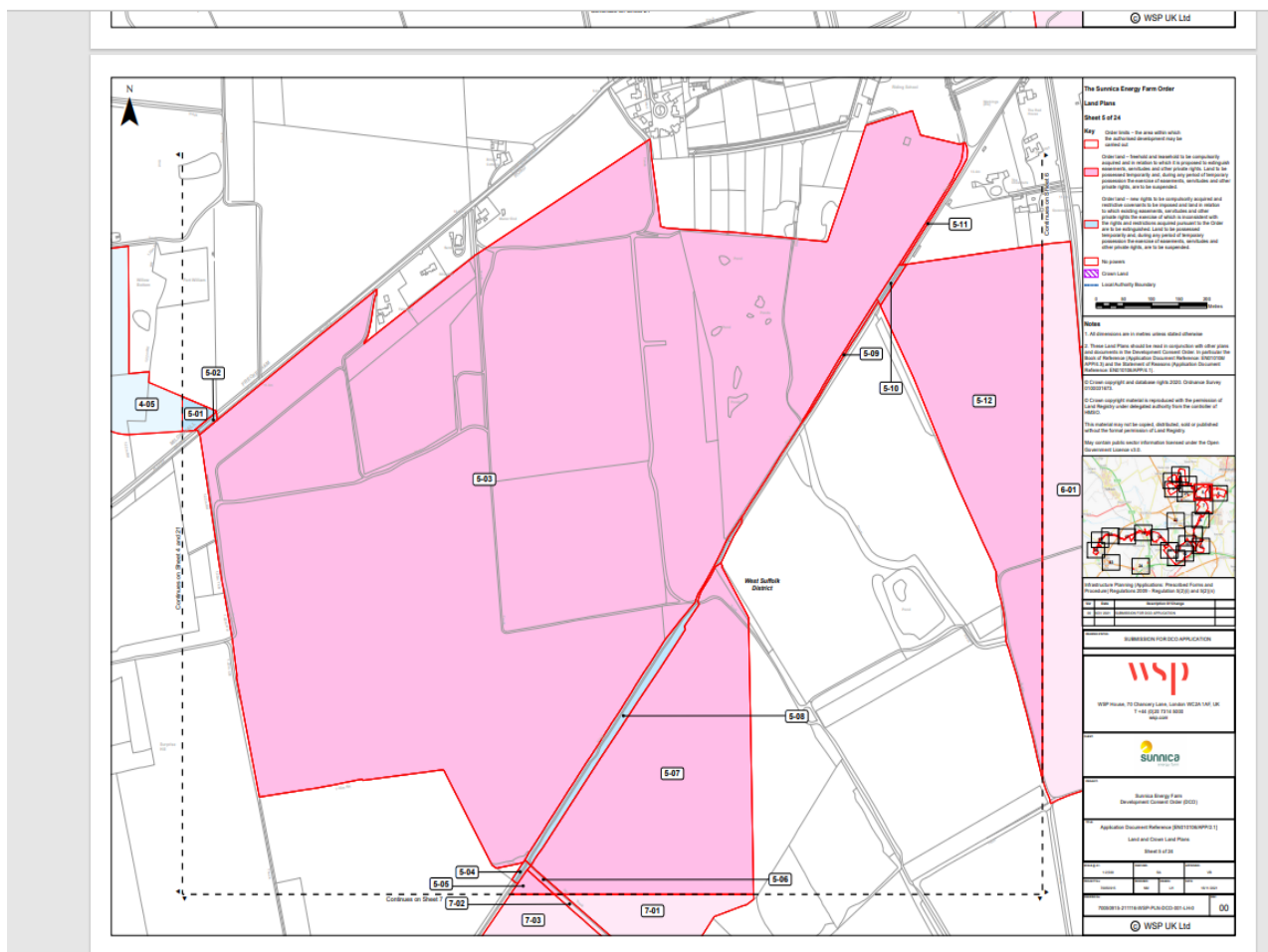


Fig 2 EN010106-001770 SEF 2.1 Land and Crown Lands

I fear for the safety of the lane which is vital to our health and well-being. Freckenham has only four footpaths worthy of that name, all of which will be impacted in some way by this scheme.

The thought of this development going ahead fills me with dread, its sprawling design will exert a malign influence over the landscape, transforming our lovely rural landscape into an industrial power plant - there will be no escaping it. There is nothing positive about the Sunnica Solar Scheme, any energy produced will go directly into the National Grid and have to be paid for at general retail rates. It may even be costlier as Sunnica made no secret that they planned to energy trade, although they have rolled back on that somewhat since realising it might amount to a material change to the application.

I have lived here for over forty years, deliberately choosing this area because its warm sunny climate is beneficial to my health. Everything I possess is invested here, not just materially and financially but emotionally. I love this landscape and being part of a small close-knit community but my aspirations for a contented old age have already been fractured by the loss of so many of my neighbours who have moved away over the last few years, undoubtedly in part due to the threat of Sunnica.

This ill thought-out scheme will result in the transformation of a beautiful rural landscape to an industrial eyesore, destroying centuries old communities and blighting countless lives solely for the private profit of a commercial enterprise with no benefit whatsoever to the local community.