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**Subject:** 20031242 Interested Parties Comments to Sunnica EN010106 proposal  
**Date:** 11 September 2023 21:36:32

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From Snailwell Parish Council (SPC) - An Interested Party  
ref 20031242

With reference to the Secretary of States invitation to interested parties dated 27 July 2023

## **Application by Sunnica Ltd for an Order Granting Development Consent for the Sunnica Energy Farm**

### **Planning Act 2008 (as amended)**

Dear Sir/Madam

Your Ref: EN010106

Thank you for the opportunity to respond on these matters.

We have set out your questions and our response.

#### **Battery Energy Storage System Design and Hazardous Substance Consent**

4. The Secretary of State understands that at the close of Examination, the Applicant had not concluded as to whether the Battery Energy Storage System ("BESS") would fall under one of the three categories in Schedule 1 of the Health and Safety Regulations, as the BESS design had not been finalised.

**The Applicant** should provide an update on its position on the BESS design and whether or not it will fall under one of the three categories in Schedule 1 of the Health and Safety Regulations.

Snailwell Parish Council response to this matter:-

The question was raised with reference to current legislation made in 2015. Could the Secretary of State also please take into account new legislation just announced which state the following.

A reference to this legislation is here:-

In the 3rd Reading stage of the Energy Bill, Andrew Bowie MP, the Parliamentary Under Secretary for Nuclear and Networks, confirmed that regulations for industrial lithium-ion batteries will be updated to more properly take into account potential fire hazards. These facilities will now require an industrial installations permit, a kind of Environmental Permit and Planning Guidance has also already been strengthened, both in response to a campaign run by local Basingstoke MP Maria Miller. Maria Miller's year-long campaign, which culminated in an amendment tabled to the Energy Bill that

was supported by 29 MPs from all the main political parties. Maria has been working with Basingstoke Councillor Kate Tuck since a planning application for a lithium ion battery storage facility was given the green light by BDBC located next to a local hospital, a river, and accessed on a narrow residential road.

Permits will apply retrospectively to existing unfinished BESS.

With BESS now planned at 2400MW and with specific regard to Snailwell Parish Councils Relevant Representation referencing 500MW and the documented and absolute admittance from Sunnica that BESS was a commercial requirement and not a technical requirement. We are convinced that the threat of failure causing environmental damage and associated threat to residents has multiplied almost 5 fold. This is an unacceptable and unnecessary risk to burden this area and population with. There is no technical requirement to co-locate battery storage and solar pv.

### **Isleham Bomber Plane Crash Site**

5. **The Applicant** should provide an update as to whether it has obtained a licence from the Joint Casualty and Compassionate Centre that would confirm the extent of the exclusion zone around the crash site.

Snailwell Parish Council response to this matter:-

The exclusion zone of 50m does not in any way represent the reality on the ground. This plane was carrying 12 crew and three 500lb bombs, the crew died on impact. The explosion at impact with the ground was heard in Ely. The debris including body parts will not be confined to 50m. Please increase this exclusion zone significantly, our suggestion is 1000m at a minimum.

### **Glint and Glare**

7. The Secretary of State notes that disagreement remained at the end of the Examination in respect of the Applicant's glint and glare assessment. **The Applicant** should confirm as to whether or not it has any further updates in respect of its position on its assessment of glint and glare impacts, in particular in relation to impacts on equestrian users.

Snailwell Parish Council response to this matter:-

Please consider the findings and explanation of equine sight in The Iowa State University paper in this link

<https://www.extension.iastate.edu/equine/vision-equine>

This paper clearly explains the function and effect of equine vision. The binocular vision we enjoy as humans is far more limited in horses thus requiring large changes to the height and position of the

head of a horse. Please see the Iowa University Paper. The head height range could be from ground level for near objects up to its maximum height for distant objects, a range from 1/2m-5m at least.

The Sunnica expert seems to have only considered glint and glare in a flat earth perspective and with horses and riders vision fixed at a set height above the flat earth or ground level. This is simply not representative of the real world and the terrain around Newmarket and the proposed area and the height of vision of both horse and rider.

The horizontal or side to side vision is also affected by head position in azimuth. If an object or change of light is detected within a horses binocular vision, as explained in the paper, it can startle the horse, particularly as horses are easily blinded by bright light. The mere existence of flat reflective surfaces will inevitably reflect sunlight throughout the day and year with changes in the elevation and position of the sun.

Solar PV on an industrial scale is not compatible with the existing mature equine environment.

### **Breckland SPA**

8. **Natural England** is invited to confirm whether the draft evidence document regarding its research into the functional linkage of stone curlew populations of the Breckland SPA, as summarised in [REP5-096] and [REP7-104], has now been made publicly available and if not, when it intends to publish it.

Snailwell Parish Council response to this matter:-

Could NE publish their draft evidence document and provide an opportunity for RSPB and possibly other focus organisations such as bee keepers, to comment on its finding as both NE and RSPB organisations are quoted as stating further research in this entire matter was required before they would be able to provide more specific recommendations on large scale industrial solar PV developments and its effect on birds, bats and general ecology. If the research is only focused on Stone Curlew, then may we conclude that their research is incomplete and that the organisations are as yet not fulfilling their own criteria to enable specific recommendations regarding "the ecological impacts of solar PV arrays across a broad range of taxa at multiple geographical scales."

As Part of Sunnica's reply to SoS is relating to Natural Englands response to Breckland SPA and its relevance to the Stone Curlew population on the Sunnica proposed site. Could we draw your attention with specific reference to Natural Englands document titled-

# Evidence review of the impact of solar farms on birds, bats and general ecology (NEER012)

This Natural England paper seems to contradict the Natural England response quoted by Sunnica.  
May we draw your attention to page 40 Conclusions —

'When considering site selection for utility scale solar developments it is generally agreed that protected areas should be avoided. This is reflected in the scientific literature where modelling approaches include many factors such as economic considerations and visual impact but also often avoid protected areas such as SPAs. This is echoed by organisations such as Natural England and the RSPB that recommend that solar PV developments should not be built on or near protected areas. As sensitive species and habitats are not necessarily restricted to the geographical boundaries of protected areas, it is imperative that research is undertaken into the potential interactions between solar PV arrays and biodiversity- especially sensitive habitats and species.'

And - also page 40 -

## 5. Recommendations

Advice given by non-governmental and governmental organisations has been referred to throughout this document. These organisations invariably state that appropriate siting, appropriate timing of construction and maintenance, biodiversity mitigation and biodiversity enhancing practices should be taken into consideration when considering a utility scale solar PV development. Although these general pieces of advice are sensible, no hard evidence has been found during the course of this literature review that allows any more specific recommendation to be given. In the literature, concerns have been raised that solar PV developments have the potential to negatively impact a broad range of taxa including birds, bats, mammals, insects and plants. In light of this, it is highly recommended that research is undertaken into the ecological impacts of solar PV arrays across a broad range of taxa at multiple geographical scales.

In conclusion the financial burden imposed on our community and organisations just considering this atrocious proposal has taken vital resources away from front line services and already has a detrimental effect. We remain opposed to this entire project.

Yours sincerely

Peter Moggridge

Chair Snailwell Parish Council