

**From:** [Isobel](#)  
**To:** [Sunnica Energy Farm](#)  
**Subject:** Interested Party Comments on Sunnica"s responses to request for information, 27.07.2023, from Secretary of State  
**Date:** 11 September 2023 23:53:12

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### **Interested party: Isobel Newport-Mangell, Chippenham**

With reference to to the Secretary of State or the Department of Energy Security and Net Zero's letter of 27<sup>th</sup> of July, the responses given by Sunnica and their representatives, and further to my previous written submissions to the Planning Inspectorate:

With regard to the issue of **Agricultural Land Classification**:

I note – unless I have misunderstood - that the Secretary of State makes no reference to this most contentious, and inadequately executed area of assessment in the consultation process.

The [British Society of Soil Guidance](#) note published by Sunnica on the 11/08/2023 states clearly the Government policy, and therefore obligation, to **'protect the nation's 'best and most versatile land' for agricultural production'**. It continues to describe the process for this classification, admitting that *'Proficiency in ALC Survey Grading of land using the ALC system is not straightforward.... There are comparatively few experts capable of carrying out ALC to a sufficient professional standard... there is no register of qualified ALC surveyors and no legal framework for chartership... ALC surveys can be influential in planning decisions. They can be subject to specialist challenge at any point in time, even years in the future. It is very important reports are assessed thoroughly... There is no approved format for ALC reports. The quality of reports - and reliability of methods / findings - can vary significantly'*.

Similarly the

[Natural England Predictive BMV map explanatory note \(also published by Sunnica 11/08/2023\)](#) provides scant reassurance that any assessment could give conclusive assurances about the classification process:

*' The Strategic Map data has a number of limitations which make it best suited for strategic planning rather than detailed site assessment purposes. These are: • The soil association data at 1:250,000 scale is a relatively crude indicator of agricultural land quality • The relative lack of (post 1988) ALC site data for some soil associations and its uneven spatial distribution means the allocation to 'best and most versatile' agricultural land categories cannot be completely objective'*

When, eventually, the public were actually able to meet in 'consultation' with Sunnica, of the many inchoate proposals and arguments that Sunnica were putting forward, the validity of the outcomes of the ALC's that they had commissioned frequently contradicted the local landowners and farmers' (those who had no conflict of interest) lived experience of yields and quality of soil for, in particular, potato crops. The land which this proposal seeks to appropriate, has prime soil and climatic conditions for particular crops. The documents make no reference to this, relying on data which, by its own admission, is not entirely reliable.

The farmers who continue to produce abundant crops on this land know that this is some of the ***nation's 'best and most versatile land' for agricultural production', it is the Government's duty to protect this essential resource.***

A much more detailed, thoroughly objective, examination and assessment of the entire area subject to industrial appropriation must be executed, and yields, quality of crop and commercial values included in the data.

With regard to the issue of: **Battery Energy Storage System Design and Hazardous Substance Consent**

The Secretary of State's observation on the lack of rigour in the Applicant's submissions relative to the Battery Energy Storage System ("BESS") should be – at this stage in the proceedings – of utmost concern.

From the start, the proposal has barely addressed this item – the key element on which the

whole business proposal hinges.

Of the 18 Chapters in the Preliminary Environmental Information Report, not one was dedicated to this, the most significant element, and the one which poses the greatest environmental risk.

In fact very few references were made in the entirety of the report. Sunnica's responses in the consultations and hearings were similarly dismally inadequate.

The response to the Secretary of State: *'Sunnica responded to many of the submissions made although as some of the submissions became repetitive as the examination progressed it made the . 2 decision that it was not proportionate to keep responding to repeated submissions.'* Is wholly inadequate.

It suggests that the challenges were inappropriate because they were repetitive. They were repetitive because Sunnica revealed themselves incapable of answering the pertinent questions relating to data on construction, materials, safety of a relatively new technology, with a rapidly evolving record for instability and serious issues relating to uncontrollable combustion with extreme levels of toxicity. And all this within metres of settlements.

It must, surely, be unacceptable for consent to be given on the understanding that a 'detailed design' will follow, 'post the granting of the development consent order', and that it is for Sunnica to determine that hazardous substances consent is required. Preposterous.

This cavalier lack of concern for the unknown, unquantified risks is deeply shocking. We have, as a nation, witnessed the entirely avoidable tragedy of Grenfell, where organisations, both private and public, felt entitled to ignore legitimate and reasonable concerns.

Installations on this scale are for deserts, or abandoned industrial sites, miles from settlements and livestock.

Thank you

Isobel Newport-Mangell

- Huge discrepancy on soil - 'best most versatile' land classification - this is a big issue and potential win. Sunnica say this land is only 1% fertile the action group expert evidence says 50%
- Stone curlew - Natural England have just abdicated from proper assessments and similarly in their involvement on soil (above). Dereliction of their Independent duty.
- Landscape - changing Limekilns beyond historic recognition, another potential win.
- Battery Safety - Sunnica say they can't provide the exact design and if hazardous regulation were necessary, which they still claim it won't be, then they will deal with it after the DCO is approved.
- We demand COMAH regulation and siting further from people. Also an ethical supply chain