

To: The Department for Energy Security and Net Zero

From: Claire Mills, [REDACTED]

Date: 23 January, 2024

ID Reference Number: 20030250.

For the attention of Mr John Wheadon

SUBJECT: Comments on the Response from Pinsent Masons to the Secretary of State's Letter to Sunnica Ltd dated 14 December, 2023 - Ref EN010106

Dear Mr Wheadon,

I am grateful to the Secretary of State for inviting the community to comment on the reply from Pinsent Masons dated 11 January on behalf of the Applicant: Sunnica Ltd.

My interest in this NSIP stems from the fact that my parents and my sister and her family live in the area covered by this DCO and their lives would be directly affected by the development.

My comments are based around two elements, as detailed below:

1. Mitigation of the development

The sheer size and scale of this proposal, if allowed to proceed, will dramatically change the landscape of this rural and unspoilt countryside which includes the unique Breckland area.

The landscape would become an industrial site of gargantuan proportion.

From the outset, Sunnica has built its proposal around the willingness of a few local landowners to give up their land in this area. Sunnica has engineered the largest proposed solar development in Europe based on acquiring these pockets of land and has never, despite numerous requests, been open regarding which alternative sites it had identified previous to this. Sadly, this pattern of lack of transparency by the Applicant has persisted throughout the entire consultation process.

Sunnica has chosen to ignore all calls from the community to provide any form of illustration or architect's drawings to demonstrate the visual impact of the Battery Energy Storage System (BESS) facilities which are on three sites within the project. This arrogant attitude has been evident throughout the process.

Surely the visual impact must be an integral part of the planning and decision-making process as this cannot otherwise be properly assessed. The BESS storage cabins are each the height of a double decker bus, the substations are 30 ft high and these will be surrounded by concrete walls, also 30 ft high. These structures are ugly and will have a devastating impact on the beautiful rural landscape. But that impact has not yet been fully understood due to the lack of sight of the visual proposals. In addition, the solar panels will stand 13 ft high, much taller than the hedgerows, which further exacerbates the spoiling of this beautiful countryside.

Pinsent Masons' letter paragraph 1.2 comments that "Further mitigation measures beyond those set out in the relevant documents should not be required." This is absolutely untrue. Their view is clearly not shared by the community.

The development should be moved to another, more appropriate, site or the scale of the proposal significantly reduced and the risks associated with BESS storage facilities removed. The immense negative effect on our countryside and historical sites will be devastating.

The same paragraph also mentions "...the identified pressing need for renewable energy generation, including solar." This should not be a driving factor for Sunnica to assume that their proposal will be given the go-ahead without due consideration to all the significant factors challenged by the community.

In summary, the Applicant's response is totally unacceptable.

2. Stone Curlews

Natural England (NE) has consistently failed to provide any form of solid evidence to support its theory regarding linkage of stone curlew populations. As a statutory body, NE must demonstrate that it has this evidence, as requested by the Secretary of State. NE's lack of content in its response demonstrates indifference to this formal request and this is unacceptable.

Without compelling evidence, NE is currently not in a position to dispute the impact of this development on the stone curlews as a rare and protected species and a hugely important part of this spectacular countryside.

Any decision made without the evidence required would be illegal.

It is important to note that NE has taken a similar position - without providing their reasoning or considering other evidence - regarding the soil quality assessments. This remains a major concern with the local community. In particular, parcel E05 is high quality farmland and it is vital that it is recognised as such.

I strongly feel that the Secretary of State must decline this application for the reasons outlined in this letter.

Thank you again for taking the initiative to invite our comments.

Yours faithfully

Claire Mills