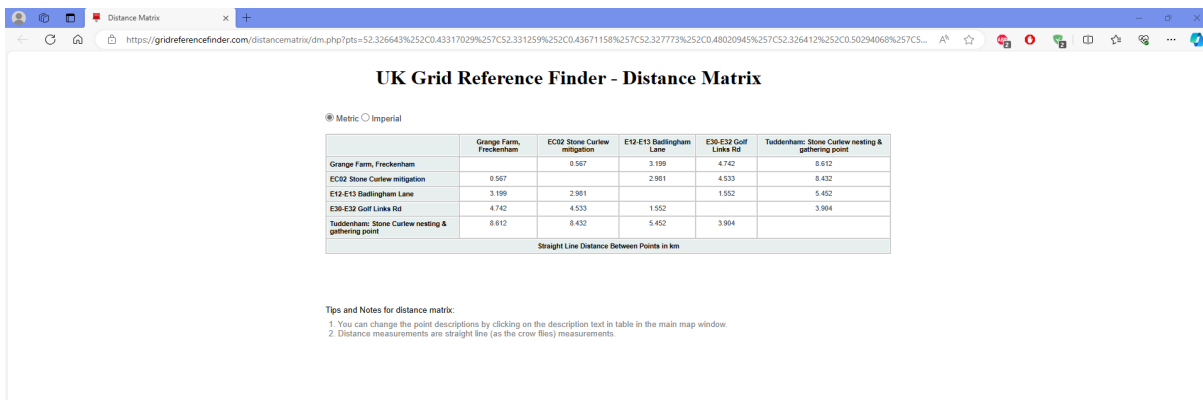
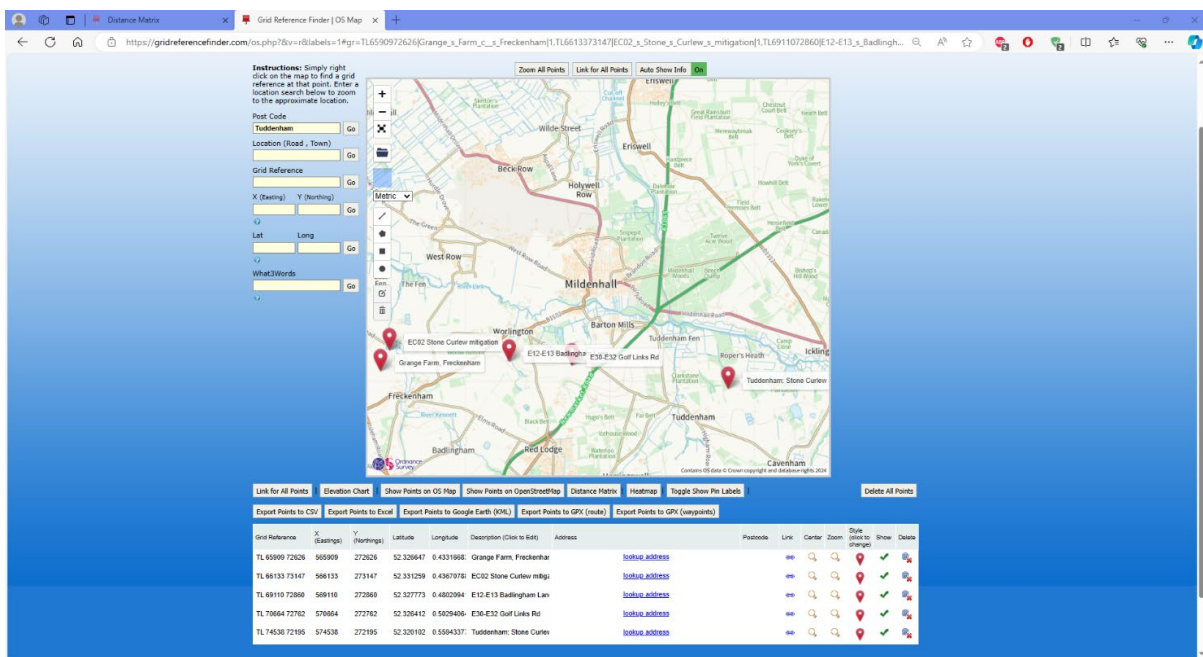


Dear Mr Western

**Response from Natural England - Stone Curlew**

Sunnica and local ornithologists recorded nesting Stone Curlews in 2019-21 over East Site B and 2019-20 & 2022-23 over East Site A. The map below shows approximate distances in kms of these sites to Cavenham Heath. Cavenham Heath is an important pre-migration gathering site for Stone Curlews within the Breckland SPA: Natural England noted over 100 were recorded one September prior to their October departure. [Cavenham Heath NNR, NE Information leaflet, 12 Jul 2014]. More recently, local ornithologists have counted up to 60 individuals. Not all will have nested on the Heath so they must have flown in from elsewhere. Given the close proximity of the Heath and the Sunnica development and the direct flight path between them it is probable local birds were among that number. It defies logic to insist there can be no link between local populations and those of the wider SPA.



Sunnica's Stone Curlew mitigation area EC02 in East Site A is poorly located given the birds' sensitivity to human presence and disturbance. EC02 abuts Mortimer Lane, a popular PROW and bridleway [REP 2-139, pp 8-10] and only a few hundred metres from E33, the BESS and substation at East Site A.

The scale of industrialisation of this scheme will have a negative effect on Stone Curlews and wildlife generally, no amount of mitigation can replace natural habitats: species deprived of suitable nesting over the several years of construction are unlikely to return, especially to a radically changed landscape.

The chosen habitat of Stone Curlews is Breckland: Freckenham, Worlington and Red Lodge are within Breckland but not in Breckland SPA. As Stone Curlew numbers increase an extension of their range must be expected, which NE acknowledge, yet still insist there is no functional linkage. It begs the question why there is a designated area rather than including the whole of Breckland: Stone Curlews are a rare species, Breckland is a rare habitat, all of it should be of interest.

**Agricultural Land Classification** I appreciate this has not come up this round but it is very important and needs to be clarified. Why has NE not been asked to explain their unquestioning acceptance of Sunnica's ALC despite the glaring disparity between it and the three independent assessments undertaken by STNS [REP 10-058 ]? The Secretary of State cannot be expected to come to an accurate or just decision based on conflicting information. These months of delay could have been fruitfully used to settle this.

### **Sunnica response**

**1.2 Design** The sprawling, intrusive nature of the finished scheme was the result of land added piecemeal to fill the acreage gap when Freckenham Estate land was withdrawn, giving the lie that it was design led.

*'The proposals have been designed to avoid nationally and locally designated landscapes'*

Breckland is a land of open spaces, long vistas and wide skies. This scheme seeks to mask its industrial infrastructure with comparatively small blocks of hedging, totally at odds with the natural Breckland landscape. How successful the screening will be is open to question but it will alter the character of the landscape beyond recognition.

**1.3 Glint & Glare** At certain times of year, we have been blinded by panels on the solar field at Bay Farm adjacent to the A11. Despite informing Sunnica of this, we have been assured throughout the entire consultation process that glint and glare was not an issue as solar panels did not reflect light. It is only at this late stage do we learn that industry standard '**generally now**' includes non-reflective surfaces. How can we believe that assertion any more than their previous one. And if isn't specified in the DCO there is no guarantee economic considerations won't be an overriding factor.

We know this is a highly productive landscape but once the land is lost to agriculture it will be lost forever, not least because it will be contaminated at the end of its 40-year life span. It can never be returned to its current, productive agricultural state, despite constant assertions that it is only 'temporary': no proof has ever been given of where a successful restoration has been achieved.

Yours sincerely

Sandie Geddes