

From: [REDACTED]
To: sunnica@planninginspectorate.gov.uk
Subject: Secretary of State's letter of 14 December 2023 - Natural England
Date: 26 January 2024 18:19:39
Attachments: [Natural England response 26th January 2024.docx](#)

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Dear Sir

I attach my response to the letter dated from Natural England 10th January 2024 (Ref 460604)

Regards
John Leitch

Response from John Leitch, resident of Freckenham.

Natural England response to request for information from the Secretary of State dated 14 December 2023.

Natural England 10th January 2024 (Ref 460604)

Regarding the above reply from Natural England, I find it difficult to understand why Natural England are struggling to submit their draft evidence documents regarding its research into the functional linkage of Stone Curlew populations of the Breckland SPA (Special Protection Area) when it would appear below that they were well on the way to finalising a report in January 2023 on functional linkage.

Ref REP5-096 Date: 12 January 2023 Our ref: 417158

3.2. Natural England is currently finalising a piece of work that looks at when populations of stone curlew are functionally linked to Breckland SPA and when they are not.

Regarding the next paragraph,

3.2.As a result of this work, we now consider that the birds found within the order limits and within 500m of the order limits are not functionally linked to the SPA (Special Protection Area) and therefore do not need to be considered within the scope of a Habitats Regulations Assessment.

How can Natural England say in January 2023 that the Stone Curlews are not functionally linked. Then in January 2024 say that they have not yet completed the draft evidence documents regarding its research into functional linkage?

Regardless of whether Stone Curlews found within the order limits and within 500m of the order limits are not functionally linked to the SPA and therefore do not need to be considered within the scope of a Habitats Regulations Assessment, surely Natural England's position is to conserve the environment for the Stone Curlew which is a protected species under the Wildlife and Countryside Act 1981. The Stone Curlew still needs to be represented in the Habitats Regulation Assessment.

In conclusion Natural England have a duty of care to honour statutory protection to special places and the wildlife that inhabits within for future generations. Enhancement through mitigation of an established landscape does not quantify as contributing to sustainable development.

From: [REDACTED]
To: sunnica@planninginspectorate.gov.uk
Subject: Secretary of State's letter of 14 December 2023 - Sunnica
Date: 26 January 2024 18:22:48
Attachments: [Sunnica 26th January 2024.docx](#)

You don't often get email from [REDACTED]

Dear Sir

I attach my response to Pinsent Masons (on behalf of Sunnica Limited) dated 11th January 2024 to request for information from the Secretary of State dated 14 December 2023.

Regards
John Leitch

Response from John Leitch, resident of Freckenham.

Pinsent Masons (on behalf of Sunnica Limited) response to request for information from the Secretary of State dated 14 December 2023

1.4 It is worth noting that solar modules are designed to absorb sunlight and not reflect it, with manufacturers aiming to maximise the efficiency of the modules. Appendix B of the Glint and Glare assessment [Examination Library Reference APP-121] refers to a publication in 2010 by the US Federal Aviation Administration (FAA) based on a previous generation of solar PV panels that shows the reflectivity from solar PV modules at the time was only 5%, the same as standing water. In comparison snow was shown to reflect 80% of light, vegetation reflects 50%, and soil reflects 30%. Research published in 2009 (also referred to in Appendix B of the Glint and Glare Assessment) revealed that the reflectivity of a solar panel is considerably lower than that of 'standard glass and other common reflective surfaces.'

Please note this comment the Federal Aviation Administration (FAA) based on a previous generation of solar PV panels that shows the reflectivity from solar PV modules at the time was only 5%, the same as standing water. I am concerned about the wording "At the Time" what time? I would like to refer you to the tar macadamised road surfaces of the United Kingdom. Like solar modules the surface is designed to absorb light and not reflect it however; some smooth surfaces still reflect especially after a summer downpour. I think all drivers would agree with this? Now take into account Seasonal Variation. During the winter months the Sun performs a lower arc and if you encounter gritted roadways, you will experience the glint / glare from the reflective wet road surface which can be almost blinding to the point of risk of accident. So, when I see these per-centages they do not take into account Seasonal Variation, which is a pivotal point to be taken into account for Sunnica's Glint /Glare assessment.

2 Breckland Special Protection Area ("SPA")

2.4 This position was re-stated in Natural England's 4 August 2023 response to the request for information from the Secretary of State, dated 27th July 2023, which states "The draft evidence document, which will provide advice on whether populations of stone curlew are functionally linked to Breckland SPA is not yet publicly available and we are not currently able to provide a date by which it will be published. However, our advice remains consistent that the birds found within the order limits and within 500m of the order limits, are not functionally linked to the SPA and therefore do not need to be considered within the scope of the Habitats Regulations Assessment."

What I do not understand is why this draft evidence which is not currently available is accepted as a proven document when it still has not yet been fully substantiated?

Decisions are being made on an unseen document.

Any Stone Curlew found within the order limits and within 500m of the order limits maybe considered not to be functionally linked to the SPA, but the fact still remains that they are a protected species that is covered by the Wildlife and Countryside Act 1981; therefore, they have to be protected whether they are functionally linked or not.

1.Landscape/Visual Impacts

1.1 Question 3-Introduction

ARUP 1.2 Question 3i: provide any updates to its position on the mitigation provided for landscape and visual impacts.

“The design of the Scheme was landscape-led from the outset, informed by the LVIA and consultation. It has evolved to respond positively to the local landscape character and to mitigate impacts on people’s views and visual amenity, while addressing the ecological and heritage constraints and opportunities within the Scheme’s context.”

The design of this scheme being landscape led is questionable especially as more land had to be acquired when one landowner pulled out from the scheme at quite an advanced stage leaving some villages bereft of their full consultation period due to extra land being negotiated closer to their village.

The scheme snakes its way through circa 2500 acres of land from West Row to the grid connection at Burwell. The scheme is so spread out it would create its own landscape environment.

Why was the Scheme not presented as a scaled model mock up during their presentations? Changes could have been represented for on-going clarity of this so-called landscape-led design.

Arup 1.3 Question 3ii: With the aim of minimising harm to the landscape and visual effects as far as reasonably possible, advise whether their work concluded that the proposed mitigation was the best available or if any further mitigation could reasonably be provided

Question 3ii In order to minimise harm you have to mitigate. The proposed level of mitigation will seriously change the areas that provide the characteristically wide-open expanses with far reaching views all round. This dramatic change will inevitably cause visual harm to established communities and change an already established natural environment.

The Sunnica development still remains a severely flawed scheme. The affected communities have been bludgeoned repeatedly by Sunnica with the threat of an NSIP (Nationally Significant Infrastructure Project) and their attitude to the affected communities has been dire in particular the removal of town names from maps to disorientate communities.

Why does someone deliberately remove town and village names from a map for such a significant development?

Year 15 of Operation.

This raises concern about how the planting of mitigated areas is managed. Climate Change will affect the planting and every year where neglectful water management has happened will create an adverse effect to year 15 of operation. In other words, the proposed effective screening will not be in place.

40 years locked in time

Sunnica Energy Farm is a locked in time development which will be unable to respond to new innovations within the renewable energy market.

To Conclude I would like to quote Sir David Attenborough

Waitrose Magazine 01 October 2020.

“It isn’t so much that politicians disbelieve you,” he suggests “It’s that they’re more likely to respond to what they see as other, more pressing problems. But people now urgently want their politicians to listen to what they’re saying. They don’t want these longer-term problems brushed under the table.”