

26 July 2019

info@sunnica.co.uk

Sunnica Ltd
FREEPOST reference
RTRB-LUUI-AGBY
C/o Newgate Communications
50 Basinghall Street
London, EC2V 5DE

Dear Sirs,

Sunnica East and West 500MW Solar Energy Farm - Non-statutory public consultation response

I am writing on behalf of the Suffolk Preservation Society (SPS) regarding your proposals for the Sunnica project currently out to public consultation. SPS is a non-political, independent, self-funding charity with its charitable aims to “*promote the conservation, protection and improvement of Suffolk’s physical and natural environment for the public benefit by ensuring any change is undertaken sympathetically and to the highest level of design and sustainability possible*”. The Society also represents the Campaign to Protect Rural England (CPRE) in Suffolk. We campaign on important issues, working constructively with the county and local planning authorities and other relevant bodies to help achieve better outcomes in planning and the management of our historic natural and built environment.

Whilst acknowledging the imperative for the transition to a low carbon economy and the need to provide renewable energy, it must be balanced with the environmental considerations. Early engagement with the local community and wider organisations is welcomed and can be beneficial in the long run, but we are very disappointed with the extremely low level of detail currently provided in terms of the projects’ design, scale and resulting visual impacts. It is therefore difficult for SPS to provide a detailed response to the project until significantly more information is made available. The following comments are therefore made in general terms, but where specific sites or areas are referred to, these have been restricted to the impact on Suffolk. Moreover, whilst the proposals will impact three county wildlife sites, we defer to the Suffolk Wildlife Trust and Natural England on points of ecology.

In summary SPS objects to the scheme on the following grounds:

- Failure to comply with national and local planning policy
- Failure to select a sequentially preferable, previously developed brownfield site in favour of a greenfield site
- Significant harm to the pattern of historic landscape

- Significant harmful visual impacts resulting from the scale, height, orientation and layout
- Inadequate information regarding the layout/distribution of panels and supporting infrastructure including batteries and inverters
- Impact on heritage assets including the setting of the Freckenham Conservation Area, Bowl Barrow at Chalk Hill and listed buildings in proximity to the Sunnica East boundary
- Impact upon the public right of way network
- Impact upon residential amenity and visual amenity

National and local policy

The relevant planning policy document NPS EN-1 supports the production of low carbon energy, yet there is no specific national policy statement relating to the commercial scale energy generation from solar. However, relevant planning advice on large scale solar development can be found within the NPPF. The Framework makes clear that commercial scale proposals should be Development Plan led and allocated through the planning system (para. 149), alternatively they should be community led (para. 152). In view of the magnitude of likely harmful visual effects it is unclear how the proposals could be well received by the communities who will be expected to host this development.

Furthermore, Policy DM8: Low and Zero Carbon Energy Generation of the West Suffolk Joint Development Management Policies Document (2015) requires proposals to be designed and sited to minimise intrusion and visual impact, include mitigation measures to address the visual impact and include an appraisal of the impact on the environment of the proposal either in isolation or cumulatively with any other similar developments. The policy concludes that in nature conservation sites, or within or visible from Conservation Areas or other heritage assets proposals must demonstrate that they proposal represent the highest standards of siting and design appropriate to the location.

Sequential site selection

We strongly object to the selection of unallocated greenfield land over brownfield sites for energy production. We call for the site selection process to clearly and openly demonstrate that brownfield sites have been identified and fully explain the reasons for not pursuing this as the preferred option. We are aware that the MoD is in the process of disposing of a number of soon to be redundant airfields and consider that this type of land would be sequentially preferable for solar energy production over the loss of extensive tracts of countryside.

Impact on historic landscape

This is an historic landscape of Rolling Estate Chalklands typology. The visual experience is one of open spaces with long views emphasised by the straight roads and regimented pattern of tree belts and hedges and resulting from Acts of Inclosure in the C18th. In particular the historic green lane that links Badlingham Manor to the village of Worlingworth is a significant historic landscape feature that must be protected and retained as a public right of way. Crop production is focused on field vegetables which has a significant impact on the landscape character whilst straight rows of hawthorn hedges or narrow belts of trees divide large fields. The proposed installation would fundamentally alter the landscape character spanning and encroaching upon a number of rural

settlements. Important landscape features including tree belts, hedgerows, footpaths must be protected and mitigation of visual impacts embedded within the scheme.

Industrialisation of landscape

The proposed solar installation would be a highly visible industrialisation of a large swathe of landscape on an unprecedented scale. Although no details are given on the design and layout of the solar panels, the visual impact of the scheme will be substantial. The height of the panels may exceed 2.5m and we note from the scoping report that an East West orientation option for the panels is being considered. If placed on this alignment it will result in a highly intrusive feature that give rise to an unrelieved coverage of the countryside due to the close proximity of the panels and limited green space between them. Whilst we await visualisations and the conclusions of a landscape and visual impact assessment to fully assess the implications of this approach, we consider that this option could have a particularly industrializing visual impact. We call for a layout that minimises the visual impacts and maximises green corridors between the arrays for both visual impact and biodiversity purposes.

Supporting Infrastructure

We are very disappointed by the lack of clarity regarding the proposals relating to the proposed batteries, with no information around the concentrated or dispersed distribution. This element will be highly prominent, standing up to 5m in height with inverters and large industrial structures, including stacked shipping containers repeating across the landscape with no attempts made to screen. It is necessary to have both scenarios fully designed before seeking views from the public about the implications of each alternative. In the absence of any thorough assessment of the number of batteries and how they might be distributed across the site and mitigated, the purpose of the consultation is severely undermined.

Impact on heritage assets

We consider that there is a significant risk of harm to nationally designated heritage assets. In particular we are concerned about the potential harmful impact on the setting of Freckenham Conservation Area. There are concentrations of listed buildings in the historic villages of Freckenham and Worlington that may be impacted by the proposals. We also note that Badlingham Manor, a listed building, is in close proximity to the south western boundary of Sunnica East and consider that the proposals may result in significant harm to its setting. On the eastern edge of the site, 380m north west of Chalkhill Cottages is the bowl barrow on Chalk Hill, a scheduled ancient monument. This well-known landmark is the only visible survivor of an immediate cluster of four barrows. There is no information supplied on how the proposals take into account the setting of these assets. A heritage assessment carried out using the methodology set out by Historic England's Historic Environment Good Practice Advice in Planning: 3 (2nd Edition) (2017) is required to fully assess these impacts. In the absence of this fundamental level of information the Society considers it virtually impossible to make meaningful comments other than to call for any harm to heritage assets to be minimised and mitigated.

Visual and residential amenity


We are concerned that the area enclosed by the red line area includes an extensive footpath network as well as minor roads. No detail is available on the siting and layout of the solar panels or any screening. However, the scale of the land coverage, the height and orientation of the panels, the number and distribution of batteries are all material to the extent of the visual impact and the

likely significant and sustained loss of visual amenity for those accessing the PROW network. Moreover the experience of the landscape for those travelling along the roads will be significantly changed, particularly where the solar panels will be on both sides of the highway. Any further public consultation must include comprehensive level of detail regarding the setback buffer areas and hedging referenced within the consultation documentation.

We have serious concerns that the red line is drawn very close to the built up edges of Freckenham and Worlington. Whilst the consultation material states that there may be some set back buffer areas in some areas, no detail is given and therefore the impact of the development on residential amenity in these areas is entirely unclear. In the absence of this fundamental level of information the Society considers it virtually impossible to make meaningful comments but call for a scheme that prioritises the residential amenity of local residents.

We trust that you will find these preliminary comments helpful in developing a less damaging and more sensitive scheme that satisfactorily reconciles the needs of the communities hosting this proposal while meeting the challenge of providing renewable energy as part of the transition to a low carbon economy.

Yours faithfully,



**Fiona Cairns BA(Hons) DipTP DipBldgCons(RICS) MRTPI IHBC
Director**

Ccs:

Chairman Suffolk Preservation Society, Andrew Fane

Rt Hon. Mat Hancock MP

Suffolk County Councillors

Phil Watson - Suffolk County Council Landscape Officer

Portfolio Holder for Planning, WSC

Boyd Nicholas, Principal Planner (Conservation and Design), West Suffolk

CPRE Cambridgeshire

Parish Councils – Worlington, Freckenham, Isleham, West Row