

26 November 2020

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

Dear Sirs,

Sunnica East and West 500MW Solar Energy Farm – statutory consultation response including the Preliminary Environmental Information Report

Introduction

I write on behalf of the Suffolk Preservation Society (SPS) in response to the statutory consultation on the above proposals for a 500MW Solar Energy Farm on up to 2800 acres of agricultural land across West Suffolk and East Cambs.

SPS is a non-political, independent, self-funding charity with 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.

Whilst acknowledging the imperative for the transition to a low carbon economy and the need to provide renewable energy, SPS campaigns for this to be carefully balanced against the necessary environmental considerations. We work constructively with the county and local planning authorities, local communities and other relevant bodies to help achieve better outcomes in planning and in particular the management of the historic natural and built environment of Suffolk. As such our comments will be restricted to the impacts of Sunnica East on Suffolk

Summary

Since SPS responded to the first round of public consultation in July 2019, we note the amendment to the Sunnica East site boundary which is welcome as it mitigates the impact upon the setting of the Freckenham Conservation Area. However, a number of concerns remain, primarily:

- Failure to select a sequentially preferable, brownfield site in favour of a greenfield site
- Significant harm to the pattern of historic landscape
- Adverse impact upon the public right of way network
- Adverse impact upon residential amenity and visual amenity
- A lack of detail throughout the Preliminary Environmental Information Report (PEIR), namely:
 - Insufficient information on size, scale and detail of the proposals
 - Insufficient information on site selection
 - Insufficient information on landscape and visual impact
 - Inadequate use of embedded mitigation through good design
 - Insufficient archaeological information
 - Inaccurate or incomplete maps, visualisations and photomontages
 - No information regarding legacy benefits/environmental fund

Insufficient information on size, scale and detail of the proposals

The PEIR does not state the electrical generation capacity in the scheme description and this is of fundamental importance and it must be clearly stated. There is also a lack of clarity around whether the Battery Electrical Storage Systems (BESS) are indicative or form a definitive part of the scheme.

There is a lack of clarity around whether the height of the fencing is 2.5m or 3m and insufficient information around the proposed fencing of the BESS. Due to the inappropriate scale of maps included within the PEIR, there is also a lack of clarity around the width of the proposed tree belts and it is unclear whether they are 5m, 15m or 30m. There is also uncertainty around the depth of the proposed buffers between the external boundaries of the site and the PV arrays. The scale of plans at 1:18,000 or 1:32,000 is far too small and makes it very difficult to interpret the portion of existing hedgerows and fully understand the areas of hedgerow mitigation that are to be introduced. There is also a lack of clarity around the proposed ground levelling and where the spoil heaps from the cable routes will be located and how high they will be.

Some of the photomontages are inaccurate and some views are cut in half. There are inadequate locations maps and the many of the maps are unclear and are very hard to read. Although we note that the viewpoints have been agreed with the local authorities, there are some important omissions such as from Freckenham towards the East B site. The annotated photos are not clear or lack detail

and the photomontages incorporating 15-year foliage growth show summer views rather than the worst-case scenario of visibility in winter.

Insufficient information on 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 concerned by the adhoc approach to site selection resulting in a series of poorly related greenfield sites of approximately 2700 acres which has a sprawling site perimeter that fails to relate successfully within the existing landscape fabric. Furthermore, we are concerned not only by the loss of productive agricultural land which is currently used for food production but also results in a site which comes unacceptably close to domestic dwellings and will result in material harm to residential amenity.

The meandering and eccentric boundary of the selected site, gives rise to significant landscape, visual and residential amenity impacts, and is a matter that must be fully assessed in the PEIR. Accordingly, the SPS is of the opinion that it is not acceptable that the Alternative Sites Assessment report will only be submitted at the DCO stage. The SPS does not support the principle of losing productive agricultural land on such a vast scale and advocates a brownfield first principle. Therefore it is important that the applicant clearly explains the reasons for selecting this site as the preferred option.

Insufficient information on landscape and visual impact

The proposed solar installation would result in the industrialization of a large swathe of landscape on an unprecedented scale and would fundamentally alter the landscape character spanning and encroaching upon a number of rural settlements. This is an historic landscape of Rolling Estate Chalklands typology and the visual experience is one of open spaces with long views emphasised by straight roads and a regimented pattern of tree belts and hedges and resulting from Acts of Enclosure in the 18th century. 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 SPS considers that the PEIR includes insufficient information on the landscape and visual effects and consistently underestimates the impacts upon landscape character and visual receptors. The use of “very low” and “low” categories of landscape sensitivity suppresses the values of some categories giving an artificially low score to the landscape and visual impacts.

Whilst there is assurance that **Public Rights of Way** (PRoWs) will be retained during the operational period, a significant loss of five PRoWs is proposed during the two-year construction phase. Moreover, the PEIR contains inadequate information on the impact on visual amenity for those using the PRoW network once construction is complete. The PEIR does not analyse the kinetic views of moving through the installation, by car, by foot or by horse and how the visual impacts will be

experienced. The proper assessment of intra-cumulative effects is very important given that there are effectively four sites which must be assessed both independently and collectively. The PEIR does not provide this level of analysis which is essential to a proper assessment of the landscape and visual impacts of the proposals.

Inadequate use of embedded mitigation through good design

The SPS objects to the monotonous layout of serried ranks of panels which pay no regard to the landscape and visual impacts of the industrialising effects of this layout. It is understood that this scheme will be the largest solar farm in Europe and accordingly every effort should be made to deliver an exemplary scheme that delivers a creative approach to renewable energy delivery in the English countryside.

National policy for energy infrastructure is set out in the Government's Overarching National Policy Statement (NPS) for Energy (EN-1). It emphasises the importance of good design, which includes siting and being sensitive to place, as the key means of minimising the harmful impacts of energy infrastructure on the landscape. A bespoke approach, identifying the features of each landscape area should be the starting point, responding to the characteristics of each area. The failure to adopt the principles of embedded design is a major flaw which is exposed by the inadequate nature of the PEIR. The scheme fails to respect, respond or reinforce existing landscape features. The opportunity to create vistas or eye-catching patterns has not been taken. A comprehensive review of the layout should be sought before the Environmental Statement stage is reached.

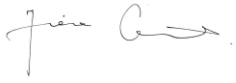
Insufficient archaeological information

The site has significant archaeological potential throughout the redline area, with Sunnica East A having the highest potential. The PEIR shows that large areas of the site have not been surveyed (217 hectares) and the areas that have been surveyed have not been ground truthed. Given the level of archaeological sensitivity, the SPS is of the opinion that much greater levels of ground truthing survey work must be carried out before the Environmental Statement stage is reached. Furthermore, we note that the PEIR refers to documents from the HER which are not up to date.

No information regarding legacy benefits/environmental fund

The SPS continues to lobby for an appropriate legacy fund or environmental fund to compensate (in part) those that will undoubtedly be impacted upon and disrupted during the life of this project. The SPS consider that the applicant should be encouraged to recognise the negative impacts of such significant infrastructure provision upon small rural communities. The price paid by those communities for the benefit of the nation as a whole is inequitable and SPS considers that this should be compensated in the form of an appropriate environmental and community fund.

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