

**Summary of Written
Representation of West
Suffolk Council Sunnica
Energy Farm (EN010106)**

11 November 2022

**Unique Reference Number:
20031311**

1. The Council recognises the benefit of renewable energy and in general has been supportive to renewable and low-carbon energy generation schemes. The Council operates its Solar for Business initiative and owns a 12.4MW solar farm.
2. The Council is committed to maintaining and protecting the quality of its unique environment. The site is within, contains or is close to a number of sites designated for their nature conservation importance, including Breckland Special Protection Area (SPA), Worlington Heath County Wildlife Site (CWS) and Badlingham Lane CWS. The area also has a rich historic built environment. The creation of the studlands and training grounds around Newmarket for the horse racing industry has resulted in a unique area of landscape with the horse racing and bloodstock industries making a significant contribution to the local economy.
3. The joint Local Impact Report sets out local policy as it relates to the proposed development. Policy DM8 of the JDMPD relates to Low and Zero Carbon Energy Generation and the proposed development is contrary to this policy. The importance of local policy should not be downplayed given that it is specific to the area in which it applies and it remains an important and relevant consideration.
4. The Council notes that the current NPS for renewables (EN-3) does not have any technology-specific policy within it and that a draft EN-3 was published over 12 months ago. The current Government has yet to affirm its commitment to solar energy and the absence of any current higher status guidance is significant. Members of Parliament for West Suffolk and Southeast Cambridgeshire have publicly objected to the scheme.
5. The scheme will result in a landscape dominated by the presence of infrastructure, altering the existing landscape beyond recognition. The fragmented layout of the scheme is likely to have such an impact on local character so as to affect the sense of place. In places the Applicant confirms that impacts cannot be mitigated to a satisfactory level. Elements of the scheme should be redesigned and more ambitious, robust and deliverable and properly secured mitigation is required. The current proposal to use the U6006 as an access would have a devastating effect. In places the landscape is very open, with little tree cover and where woodland planting would not be appropriate mitigation. The appearance of the battery containers is of concern with white containers being highly visible.
6. The Applicant's submission identifies the potential for likely significant effects during construction to land that is functionally linked to Breckland SPA and its population of Stone Curlew. The scheme should be designed to avoid the destruction of confirmed stone curlew habitat and minimise disturbance.
7. The Council is concerned that the Applicant's ecological baseline survey work is incomplete and as such the extent of any potential effects cannot be judged. There are areas in which mitigation and/or compensation measures are either inadequate, too vaguely defined or inadequately secured by the draft DCO. The Council does not agree with the Applicant's assessment that the

development as proposed would not result in significant residual effects to ecological receptors.

8. The Council recognises that the scheme has the potential to generate local employment and local investment opportunities, however, concerns remain that the scheme will have a negative impact on the local economy.
9. The horse racing industry has made representations on the potential for impacts on Newmarket. The scheme will be visible from the Limekilns gallops and will detract from the special qualities for which the area is known.
10. The Council is unable to verify the Applicant's Soils and Agriculture Baseline Report and notes the concerns raised by the community on the accuracy of the assessment. The Applicant has failed to fully consider the productivity of the land and the issue of food security. The impact of the proposal on the Bay Farm Anaerobic Digester has not been considered.
11. The Council fully endorses and supports the position of Suffolk County Council as the local highway authority in relation to traffic and transport impacts. The impacts of traffic generated during all phases will be acutely felt at a local level. Measures in relation to wheel washing and road sweeping must be implemented.
12. There is a lack of detail in relation to the BESSs and the implications of a fire within the battery compounds, particularly in relation to public safety.
13. The Suffolk Fire & Rescue Service has an interest from operational firefighting point of view only and has acknowledged that there is very little guidance or legislation on this topic.
14. The Council supports the LLFA in their request for further information to demonstrate that a suitable drainage solution can be delivered.
15. The prolonged consultation and pre-examination phases have resulted in a great deal of stress and uncertainty being felt in the community.
16. The construction phase is likely to result in complaints from sensitive receptors in relation to noise and vibration (similar effects at decommissioning). There are no immediate benefits to the local residents.
17. Whilst the Council acknowledges the contribution that the proposed development would make towards achieving energy security and renewable energy generation, it is contrary to many adopted Local Plan policies and fails to deliver any significant community benefits. The Council objects to the proposed development in its current form and recommends that a Development Consent Order is not granted.