SUFFOLK PRESERVATION SOCIETY
Respecting the past, shaping the future

Little Hall Market Place
Lavenham Suffolk CO10 9QZ
[redacted]

9 November 2022

Via email: sunnica@planninginspectorate.gov.uk

Dear Sirs,

SUNNICA EAST AND WEST 500MW SOLAR ENERGY FARM
WRITTEN REPRESENTATION

Summary of Objection:

SPS objects to the scheme on the following grounds:

a. **Scale and fragmented nature of the scheme has the potential to destroy the sense of place**
b. **Failure to select a sequentially preferable, previously developed brownfield site in favour of a greenfield site**
c. **Landscape and visual impacts on setting of Newmarket**
d. **Impact upon the pattern of historic landscape**
e. **Inadequate information regarding the layout/distribution of panels and supporting infrastructure including batteries and inverters**
f. **Inadequate information on mitigation of the visual impacts**
g. **Visual amenity and the PROW network**

INTRODUCTION

The Suffolk Preservation Society (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 CPRE, The Countryside Charity, 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.

The SPS will limit its comments to the Sunnica proposals as they affect Suffolk, however our representation will include elements of the scheme which are located beyond the border, but have the potential to impact upon the wider setting of Suffolk.

SPS POSITION ON COMMERCIAL SOLAR

SPS supports the transition towards a zero-carbon energy system and renewable energy schemes which balance the necessary considerations of our natural environment, heritage, landscape and the views of local people and allow local communities to positively shape their energy futures.

We therefore call for:

- The prioritisation of brownfield over greenfield sites
- The retrofitting on industrial/commercial roof tops as the preferred option for commercial solar schemes
- Where greenfield sites are pursued, best efforts should be made to avoid productive food growing land
- Schemes should avoid harmful impacts on historical, archaeological and cultural heritage
- Schemes must allow for appropriate and effective landscape mitigation that ameliorates impact upon receptors including walkers, riders, cyclists and motorists
- Provision of sufficient landscape mitigation to provide biodiversity net gain, nature corridors and to permit the planting of standard trees in hedgerows in so far as it does not give rise to landscape harm by a fundamental change in character

THE SPS WISHES TO OBJECT TO THE SUNNICA SCHEME ON THE FOLLOWING GROUNDS:

a. Scale and fragmented nature of the scheme has the potential to destroy the sense of place

- At 981 hectares (including cable corridors) the Sunnica order limit is the largest commercial solar scheme in the UK and is two-thirds of the size of Newmarket
- It has the potential to fundamentally alter the sense of place across 5 parishes in Suffolk and 6 parishes in Cambridgeshire and to change the existing character of historic landscapes which have been given over to arable and grazing for centuries
- The wider setting of Newmarket, the internationally important home of horseracing, will be negatively impacted.
- The fragmented nature across such a diversity of landscape types means that the assessment of impacts is both complex and challenging and results in significant landscape harm.

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Within the Suffolk Landscape Assessment, the developable area of 621 hectares includes three different landscape typologies the Rolling Estate Chalklands, (part of East A and B), Estate Sandlands (East A and part of East B) and the Settled Fenlands (part of East A). The scale and

fragmented nature of the scheme will also give rise to issues of cumulative impacts of intra and inter related landscape and visual impacts. The site area is a complex patchwork of landscape types, long views and varying visual sensitivity and the fragmented nature of the scheme will result in the landscape and visual impacts affecting a far wider overall area of the countryside.

This complex tapestry of different landscapes will be lost under a vast swathe of panels, battery storage, solar stations, car parks, fencing and other infrastructure. The grain and character of this historic pattern of different landscape types will be permanently changed as the transition from one landscape type to the next will become blurred.

b. Failure to adopt a sequential site selection approach

The site selection process is flawed because environmental constraints and potential alternative sites have not been properly considered.

We strongly object to the selection of unallocated greenfield land over brownfield sites for energy production. The site selection process should clearly and openly demonstrate that brownfield sites have been identified and fully explain the reasons for not pursuing this as the preferred option. However, the overriding site selection criteria would appear to be the availability of contiguous land. 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.

Moreover, we fully endorse the conclusions in the Michelle Bolger Expert Landscape Consultancy report, prepared for Say No to Sunnica, regarding the Red Amber Green (RAG) Assessment. The report concludes that the site selection process is flawed because:

- The landscape and visual criteria were inadequate. They were too coarse and failed to consider landscape character impacts. Consequently, all sites scored the same (amber).
- Aspects such as Green Infrastructure were ignored - the location of Sunnica West Site A is within the Chippenham Fen GI Strategic Area.
- Key viewpoints, such as those at Limekilns Gallops were ignored and therefore there was a failure to identify that it will not be possible to mitigate the impact on certain viewpoints
- Despite the fragmented and dispersed nature of the development and the extensive area that it covers, it was assessed as a single site. Consequently, the assessment is too coarse to have considered the different issues that the geographically discrete sites raise, such as the potential impact on the Limekilns Gallops.
- There was no consideration of the cumulative impacts of the development, which is a uniquely harmful aspect of this proposal.

c. Landscape and visual impacts on setting of Newmarket – Sunnica West A

The industrialising effects of the scheme have the potential to materially harm the character and appearance of the setting of Newmarket which is the international centre of horseracing.

We consider that the submitted LVIA fundamentally underestimates the sensitivity of this landscape by assessing the Limekilns Gallops as being of medium value.

The Newmarket Conservation Area Appraisal (draft 2009) describes the town's landscape setting as lying in a *shallow depression surrounded by a gently undulating chalk grassland and woodland landscape. The land rises gently all round from the centre of the town marked by the Jockey Club to the open grassland landscapes of Newmarket Heath to west, with its view of the town, to the Limekilns in the east, and to the grassland and tree belts of the studs to south and east*. Outside Newmarket the land is occupied by racehorse studs, with pastures set among woodland belts often enclosed by post and rail fences.

The Newmarket Neighbourhood Plan was recently adopted and refers to the importance of the adjoining countryside to the north of the town which form part of the wider setting of the Conservation Area. At Para 6.9 it states that the views over and across the town are defined by the beauty of the wider landscape setting.

The **Limekilns Gallops** form a vital part of the landscape setting of Newmarket as although it is located across the county boundary in Cambridgeshire it forms an integral part of the international centre of horseracing. The gallops perform an important function to the operation of the horseracing industry in the town. It is used for exercise and training of horses together with a range of other horseracing related activities, such as sales.

The Limekilns provides wide ranging views north towards Chippenham Park, which has a cultural, functional and historic relationship with Newmarket racing. It is in essence one of the major shopfronts of the town and makes an important contribution to the significance of Newmarket. Sunnica West A will impact directly on the long panoramic views to the countryside beyond, which can include Ely Cathedral standing as majestic emblem within the fenland landscape, with the development visible across the full horizon.

We consider that the submitted LVIA fundamentally underestimates the sensitivity of this landscape by assessing the Limekilns Gallops as being of medium value. This gives insufficient weight to the rarity or cultural value of the Limekilns. Furthermore, the LVIA does not correctly identify the key receptors and there is no consideration of potential impacts on that value. SPS therefore concurs with the conclusion of the Michelle Bolger Expert Landscape Consultancy report that the level of value and sensitivity of this landscape has been underestimated and that due to the elevated topography of the Limekilns, mitigation planting will be ineffective in screening the development.

Moreover, the avenue from Newmarket to Chippenham Park passes directly through West Site A. This is an important landscape and cultural feature that links the Park to the town. The

avenue is clearly visible from the Limekilns and formed the main C18 entrance drive, entering the park to the south of the Hall from the northern outskirts of Newmarket. The drive runs straight until it reaches the park wall where a pair of neo-classical ashlar limestone High Park Lodges, linked by a Triumphal Arch (listed grade II*), were erected by Lord Sandys in c 1745 to mark the entrance to the park. Although the proposed layout of West Site A includes a set back from the avenue and the edge of the Park, the proposals will adversely impact these heritage assets. SPS notes and concurs with the conclusion in the Heritage Assessment, prepared by Richard Hoggett Heritage on behalf of Say no to Sunnica, which concludes that this impact has been underestimated by the Applicant and that **an adverse impact of high magnitude will result on the setting of both the avenue and Chippenham Park**.

d. Impact upon the pattern of historic landscape – Sunnica East A and B

> The current open agricultural countryside with far reaching views, openness, tranquility and remoteness, which currently surrounds the villages of Worlington and Freckenham, will be fundamentally changed.
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> It will be replaced by a predominantly industrial landscape with planted mitigation screening which has the potential to significantly impact on the landscape character by closing down the views.
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> Crucially, the distinction between the varying landscape typologies will be lost.

This is an historic landscape consisting of three landscape typologies: primarily Rolling Estate Chalklands; Sandland Estate; and Settled Fenland typologies. Nevertheless, the visual experience is predominantly 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 Enclosure in the C18th. 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 areas of solar panels at Sunnica East A and B including the proposed Battery Energy Storage System (BESS) will dwarf those of nearby villages including Worlington and Freckenham.

The footprint of Sunnica East B will overwhelm the size of **Worlington**. Areas of panels and fencing are shown as coming right up to the built-up area of the village and to the roadside when approaching the village from the east, west and south. Moreover, the transitional boundary between the different landscape typologies to the south of the village will be erased by the proposed solar installation.

As part of the evidence base for the emerging **Freckenham** Neighbourhood Plan, the Landscape Sensitivity Report identifies a series of character areas lying outside Freckenham and forming part of its setting:

> The character area R2 comprises the northern part of the parish from the village edge at the end of Mortimer and North Lanes as far north as the parish boundary along the River Lark,

west of West Fen Road. The Report states that *It is a zone where the wide open farms of the fenland edge merge into to the more regularly wooded Breckland landscapes to the east. The transitional character of the landscape (between the Brecks and Fens) is expressed in the visual experience here. Overall, the character is very open and long views are possible. To the east views terminate along a horizon lined with Breckland plantation woodland and hedges, whereas views out to the fenlands to the west are more open and far reaching to the distant horizon, broken by only occasional lines of trees. In this character area hedges are usually present enclosing the roads and lanes, sometimes gappy, although they don't tend to be seen separating fields which have an open, large-scale character, with big skies overhead.* It scores a moderate rating for landscape value but scores a high visual sensitivity because of its open nature with long views and openness and the challenge of accommodating large or vertical structures.

With regard to the proposed Sunnica scheme, the Report states: *Part of this area is under consideration for a large scale solar farm. This character area has much less capacity than the more wooded and contained landscape to the west and south, the openness means that large scale landscape change would be very noticeable from the wider landscape and impacts would be felt across a wide area.*

The proposed installation would fundamentally alter the landscape character spanning and encroaching upon a number of rural settlements, materially affecting the open, flat landscape characterised by large skies and open views. In particular, the height and silhouette of the BESS would be prominent and difficult to effectively mitigate.

e. Inadequate information regarding the layout/distribution of panels and supporting infrastructure including batteries and inverters

Insufficient information has been provided by the Applicant regarding the visual impacts of the multiple proposed BESSs. It is therefore very difficult to assess the effectiveness of any mitigation proposed.

No clear information has been given about the layout of the solar arrays and the number and layout of proposed containers, their orientation or the distances between them.

The proposal represents the industrialisation of a large swathe of landscape on an unprecedented scale. While the PV panels will cover in excess of 600 hectares, the associated infrastructure in the form of three BESSs represents approximately 10% of the site area and their associated visual impacts will be substantial.

The BESS will require in excess of 31 hectares of developable land and consist of: Sunnica East A (6.6ha), East B (16,3ha and West A (8.3ha). The two permanent compounds at East A and East B will include multiple structures including a permanent building measuring 31m (L) x 13m (W) and 5M(H). At East B a building measuring 35.5(L) c 25m (W) and 8m (H) with 20 car parking spaces is proposed. Each BESS will include an inverter, transformer and switchgear.

The number of containers per BESS has not been specified, although the dimensions for each container are quoted as 17m (L) x 5m (W) x 6m (L).

The substation shown at East A measures 85m (L) x 55m (W) x 10m (H) with the substation at East B significantly wider at 130m (W). Each substation may include a control building measuring 25m (L) x 8m (W) x 7m (H) and a welfare building measuring 25m (L) x 8m (W) x 3.5m (H). The drawings of the 400kv connection solution also show a 10m high wall between the transformers/shunt reactor at East B. Each substation also includes a 6m (H) monitoring and control building, water tanks and are surrounded by perimeter fencing measuring 2.5m (H).

Despite the lack of information, it is reasonable to conclude that large vertical structures, especially the 10m height of the proposed substations, would appear incongruous. The visual clutter will seriously impact upon the qualities of openness, rural character and sense of remoteness that define the affected landscapes which will be incapable of effective mitigation given their open and rural nature.

f. Inadequate information on mitigation of the visual impacts

There is an inadequate number of photomontages. Their value is limited as they show summer foliage only and do not accurately represent the BESS infrastructure.

The impact of glint and glare on users of the Limekilns has not been assessed.

The value of the photomontages within the LVIA is limited as they do not consider the effects of the proposals in the wintertime. Consequently, the impact of the proposals on the landscape throughout the winter season, when tree cover will be reduced, is underestimated. The year 15 effects have been based on summer coverage and therefore we expect have overestimated the effectiveness of the proposed mitigation.

The applicant has also failed to assess the impact of glint and glare on users of the Limekilns Gallops despite the raised topography of the land which will render mitigation planting ineffective in screening the development throughout the year.

There are also an inadequate number of viewpoints and photomontages, given the scale and spread of the proposals, to accurately assess the effectiveness of the proposed mitigation. Some of the viewpoints have not been selected to assess key areas for example there are no viewpoints to the south from the avenue between Chippenham Park and the Limekilns. This is of particular concern as no mitigation planting along the facing boundaries of parcels W06, W03 and EC05 of West Site A is shown on the proposals.

The previously mentioned lack of information regarding the layout and appearance of the BESS compounds also results in inaccurate visualisations. The BESS are represented by a solid green block rather than the collection of industrial clutter of the substations, containers and inverters as well as fencing that would be associated with the compounds. The result is that the

impact of the BESS within the landscape is seriously underestimated and the effectiveness of any proposed mitigation planting cannot be assessed.

g. Visual amenity and the PROW network

The area enclosed by the red line includes an extensive footpath network as well as minor roads which are regularly used by walkers and horse riders.

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.

There are footpaths across the Limekilns which are open to the general public when the area is not being used by the horse racing industry. The raised topography affords long ranging views over the countryside to the North, with views as far as Ely cathedral standing as an emblem of the fenland landscape, possible on clear days. The visual amenity of those accessing these footpaths, as well as those using the Limekilns for exercising of racehorses, will be impacted by the proposed 256ha West Site A which due to its scale and the topography will render it incapable of meaningful mitigation. The introduction of lines of solar panels as well as the 8.3ha BESS development, perimeter fencing and access roads into this view will cause a significant adverse impact for the highly sensitive receptors of this historic site.

The experience of the landscape for those travelling along the footpath network and minor roads will be impacted by East Sites A and B will be significantly changed. The adverse effect being particularly great where the solar panels will be on both sides of the highway between Freckenham and Red Lodge, and between Isleham and Freckenham. Those using footpath links between Badingham and Red Lodge and Worlington will also be impacted as the open aspects with far reaching views currently enjoyed will be replaced by views of boundary fencing on either one or both sides.

CONCLUSION

The size of the scheme and the scale of the heritage, landscape and visual harm has the potential to destroy the sense of place across a wide-ranging area. The site selection process results in harm to the pattern of historic landscapes and their distinctive typologies. The scheme is especially harmful to the wider setting of Newmarket, an internationally important home of horseracing.

The magnitude of visual impacts requires the highest quality of assessment to robustly support the proposals and effectively mitigate their impacts. The application as it is currently presented is wholly unacceptable due to the inadequacy of the submitted information and assessment of those impacts.

The SPS respectfully requests that the scheme is modified to minimise the significant landscape and visual harm, and the most important special qualities of Newmarket and its setting are safeguarded and all other impacts are appropriately mitigated.

Yours faithfully,

[redacted]

Robert Townshend Dip.LA, CMLI, Hon FRBS
Chairman

Ccs:
Rt Hon. Mat Hancock MP and Rt Hon Lucy Frazer KC MP
Suffolk County Councillors
Phil Watson - Suffolk County Council Strategic Energy Projects Lead
Portfolio Holder for Planning, WSC
West Suffolk Planning Lead
Catherine Judkins, Say No to Sunnica
CPRE Cambridgeshire
Parish & Town Councils – Worlington, Freckenham, Mildenhall, Barton Mills, Red Lodge, Newmarket