

WRITTEN REPRESENTATION

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Introduction: I fully support the transition to renewal energy although I have reservations about toxic chemicals used in solar panel construction, and panels manufactured by slave labour. However, I strongly object to the Sunnica Solar Energy Schemes: it is too big, in the wrong place, badly designed, its sprawling design will dominate our countryside and negatively affect our quality of life.

Footpaths: Closure of footpaths for short or long periods will detrimentally affect our physical and mental health. There are only four reasonable walks in Freckenham, all will be impacted by the Scheme: three will be closed for part or all of the construction period: the bridleway section of Mortimer Lane [W-257/002/X] for soil stripping of the highly productive ECO2 for acid grassland mitigation; the lower part of Blanding's Farm footpath [W257/003/0] for cabling; and the central section of U6006-Badlingham Lane for construction traffic and underground cabling, which may result in destruction of its trees and hedgerows, as all vegetation above cable corridors must be cleared to prevent root penetration.

U6006 – I am especially concerned for the future of U6006, this unmade-up road, locally known as Badlingham Lane or Green Lane, running diagonally across what was once heathland between Freckenham and Worlington, in part a designated County Wildlife Site. It is a popular footpath and bridleway, also used by cyclists and motor cyclists.

Its scenery is full of interest, transitioning from a productive agricultural landscape through mixed woodland bordered by Scots Pines into open heath, typical of the Brecks, through to the County Wildlife with its mature broadleaves and wide hedgerows. Its rich flora and fauna include a wide range of heathland and hedgerow plants, rare birds and bats (Red Listed Stone Curlews and Lapwings and Amber Listed Tawny Owls and Shelducks), geese, deer,

insects and numerous butterflies; raptors, including buzzards, kites and kestrels are testament to this abundant wildlife.

It is believed to be part of the historic Icknield Way, not least because an Icknield Way Rider's Route signpost has stood at the Badlingham Road-Elms Road crossroad for many years. We have recently learned that when the Ramblers devised their modern walking and riding trails (with which the historic Icknield Way is often and erroneously confused) it was assumed Badlingham Lane was a farm track rather than a PROW, so riders were instructed to bypass it although walkers were encouraged to continue on to Worlington [Shirley Toulson, *East Anglia, walking the ley lines and ancient tracks*. Wildwood House, London 1979, p123]. According to the Ramblers Association Icknield Way path leaflet No. 3, the colouring of the lettering on Riders Route signposts indicates the status of the right of way: 'red for byways, blue for bridleways, yellow for footpaths and white for permissive paths', this one is white.

Seeking clarification of the lane's history we contacted Tim Malim, consultant heritage professional, author, and archaeologist who has considerable practical experience of the archaeology of the Cambridgeshire region and specialism in linear earthworks such as dykes and ancient routeways. Mr Malim gave us the following information which he confirmed in a Relevant Representation :

The Icknield Way is a very ancient route that connected East Anglia with the south-west, following the oolitic limestone and chalk downlands through Suffolk, Cambridgeshire, Hertfordshire, Berkshire, Oxfordshire and Somerset. As a major arterial prehistoric routeway across the country, the Icknield Way (in some counties referred to as The Ridgeway) was a zone of travel rather than a specific road, but its significance as a heritage asset is extremely high. It was regarded as one of the ancient highways of England used not only by prehistoric people, but also by successive Anglo-Saxon armies as a "herepath", a road along which armies moved rapidly. Great linear earthworks such as the Black Ditches and Devils Ditch in Suffolk, and Devils Ditch, Fleam Dyke, Brent Ditch and Bran Ditch in Cambridgeshire, were built across the line of the Icknield Way to control movement through this zone. Parts of the route have become fossilised and constrained into green lanes and bridleways, such as the straight course that runs between two parts of the proposed solar farm . . . [Tim Malim, BA, FSA, MCIfA, Hampton Heritage, Relevant Representation 17 March]

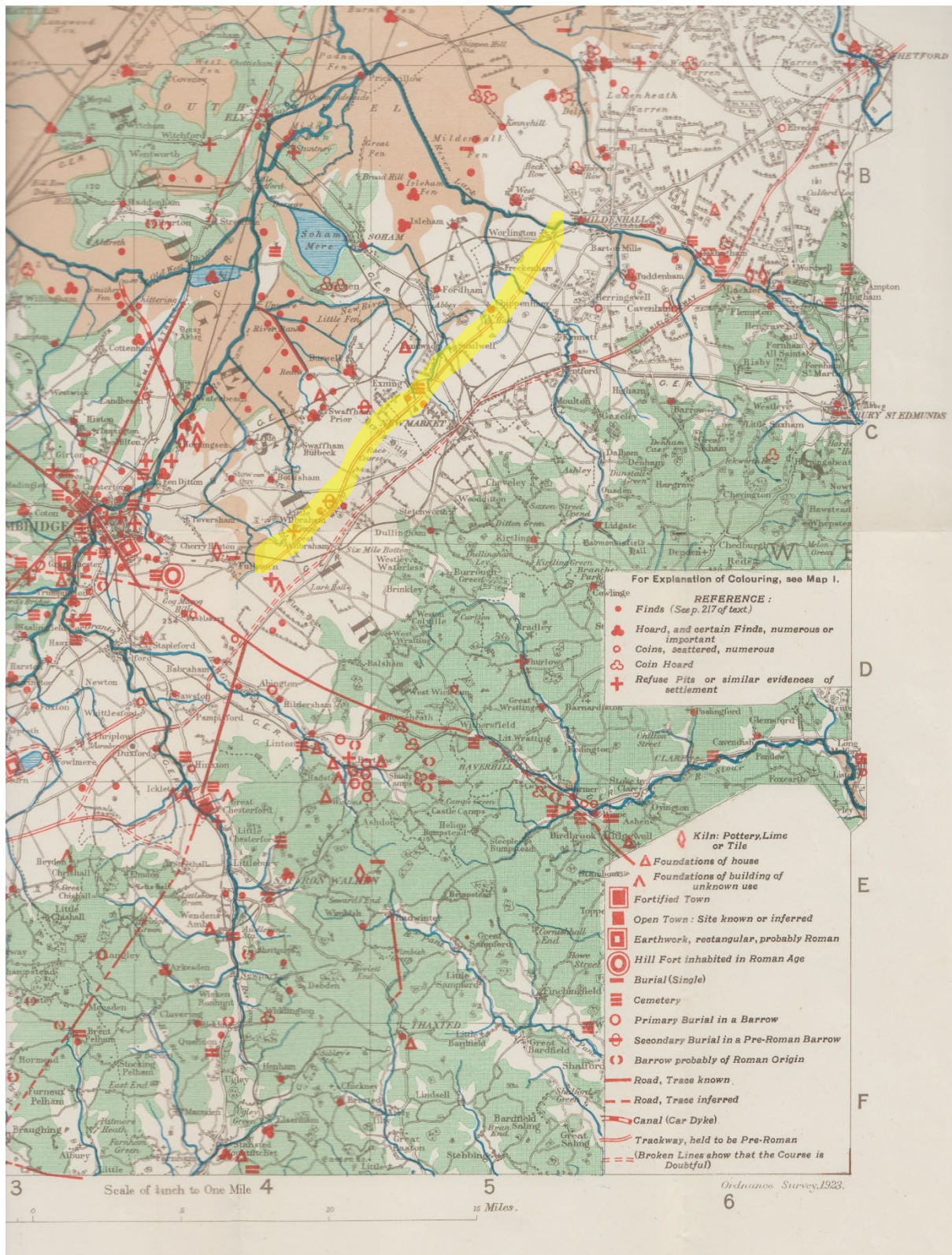
Cyril Fox, in a seminal work of the archaeology of the Cambridge region, using topographical and artefactual evidence, suggested it was an extension of Ashwell Street or Street Way:

The roads that go by these names undoubtedly form one system parallel to the Icknield Way from Ashwell to the River Lark. Evidently Roman or Romanized on one

sector, it presents the characters of a pre-Roman way in others. . . It duplicated the Icknield Way for travellers who desired to be near wood and water, and it may indeed have been the “summer road” of, and therefore as old as, the Way itself.

Street Way runs parallel to, and at a distance of 1-1.1/2 miles from, Icknield Way for 7 miles to Exning, making for the springhead known as St. Mindred’s Well. Though breaks occur its course is clear thence past Snailwell, through Chippenham Park: crossing the Kennett at Badlingham Hall, an ancient manor, it makes by a well-defined ancient way for the River Lark at Worlington [Fox, Sir Cyril, *The Archaeology of the Cambridge Region*, CUP 1923, p147-9]

Fox was unable to trace the route beyond Worlington but suggested it may have been primarily of local importance and had served its purpose once it reached the river Lark. In assessing the value of Fox’s work, Tim Malim concludes that the ‘vast increase in known sites and finds over the past 70 years allows us to confirm his results as well as to add further candidates’ and suggests one of these further candidates may have run from Manea, through Downham, Ely, Soham and Isleham, linking into Badlingham Lane towards its end, also that it was one of the three main routes of the Icknield Way. [Tim Malim, Ch. 11, Prehistoric Trackways, in *An Atlas of Cambridgeshire and Huntingdonshire History*, Tony Kirby & Susan Oosthuizen (eds), APU, 2000].



Map IV – Finds and Remains attributed to the ROMAN AGE: from 43 A.D. to the early V century A.D., from *The archaeology of the Cambridge Region*

Tim Malim was led to the conclusion when re-evaluating the site of the Isleham Hoard, that Bronze Age smiths were itinerant, carrying their materials and storing them along well established routes:

Closer scrutiny of the locations for these founder's hoards does suggest a common thread in that most, if not all, are situated in the proximity of prehistoric routeways. Those at Meldreth and Chippenham lie close to one of the routes of the Icknield Way (The Street Way or Ashwell Street), which follows the springline at the base of the chalk hills. [Tim Malim, et al, *The Environmental and Social Context of The Isleham Hoard*, pp 121-5. The Antiquaries Journal, **90**, 2010, pp 73–130, 14 April 2010].

The Chippenham site referred to is the Late Bronze Age foundry site close to Badlingham [CHER 07573].

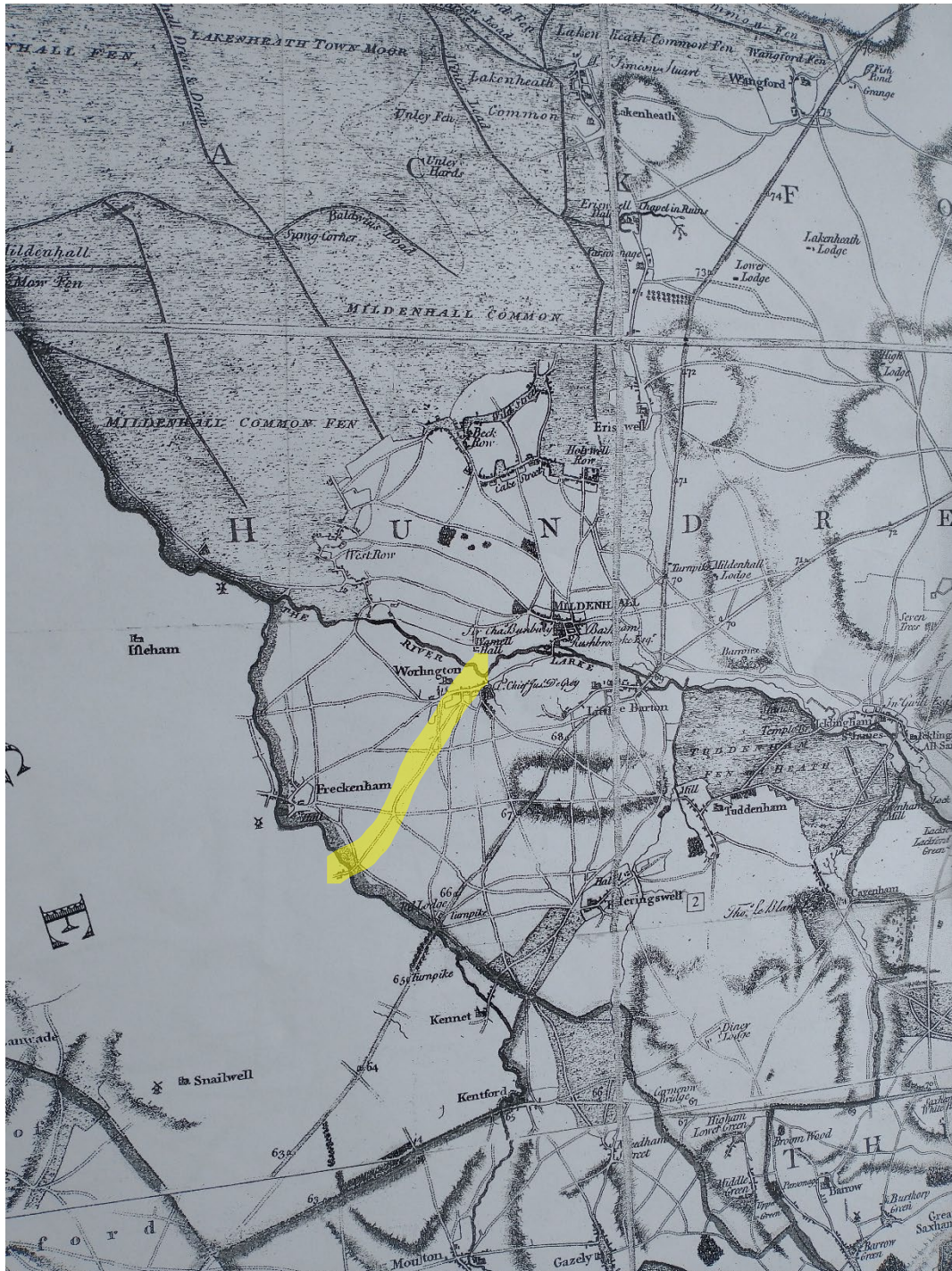
Cambridgeshire Historic Environment Record notes that the bridge over the river Kennett at Badlingham is 'on or near the site of a Roman crossing.' [CHER 01065, Badlingham Manor, Item 5].

Rivers and river valleys enabled ease of movement, often faster and more reliable than roads. The river Lark forms the northern boundary of Worlington parish. Its importance to the local economy is attested by two landing stages: one at the Hythe beyond the church and another at an inlet opposite Wamil Hall, historically once the commercial centre of the village [Colin Dring, *22 Villages*, FHDCA 2000, 96].

Badlingham Lane may have been part of the Walsingham Way pilgrim route. According to the Rev. Leonard Whatmore, Walsingham was the second most popular pilgrim destination after Canterbury, with Mildenhall the principal stopping place between Exning (Newmarket) and Brandon. He noted that Robert Morden's 17C map of Suffolk in Camden's *Britannia* showed that the road ran via Chippenham and Badlingham, then very slightly east and west of Freckenham and Worlington respectively. He noted that this route still exists [Badlingham Lane] but is westward of the present main road from Newmarket to Brandon which now bypasses Mildenhall. [Rev Leonard Whatmore, *Highway to Walsingham*, The Pilgrim Bureau, 1973, CUL 9100.d.8683]. The route is clearer on Morton's Cambridgeshire 1695 map, see Wikipedia UK under Robert Morden Mapmaker.

Badlingham Lane is comparatively straight: Dr Rob Wiseman, President of the Cambridge Antiquarian Society suggested this was a consequence of enclosure thus arguing against its antiquity. However, Hodkinson's 1783 Map of Suffolk disproves this as it predates both Worlington enclosure of 1799 [SROB E18/600/6/1] and Freckenham enclosure of 1824 [SROB E7/24/3.1]. Hodkinson's map, described as the most accurate for its time [David Dymond, Introduction to *Hodkinson's Map of Suffolk 1783*, Larks Press, 2003], depicts a

lane as straight then as it is now, albeit crossed by many tracks and paths which were subsequently absorbed into private allotments. On an 1816 plan of the warren [SROB 613/763/4] these roads are named, by direction, but by 1824 most have disappeared. The Freckenham Enclosure map shows only two roads crossing the heath and warren: Road No. 6 The Bury Road, now Elms Road, and Road No. 7 The Badlingham Road to Barton, now U6006.



Hodkinson's 1783 Map of Suffolk, showing multiple lanes crossing the heath. Badlingham Lane highlighted.

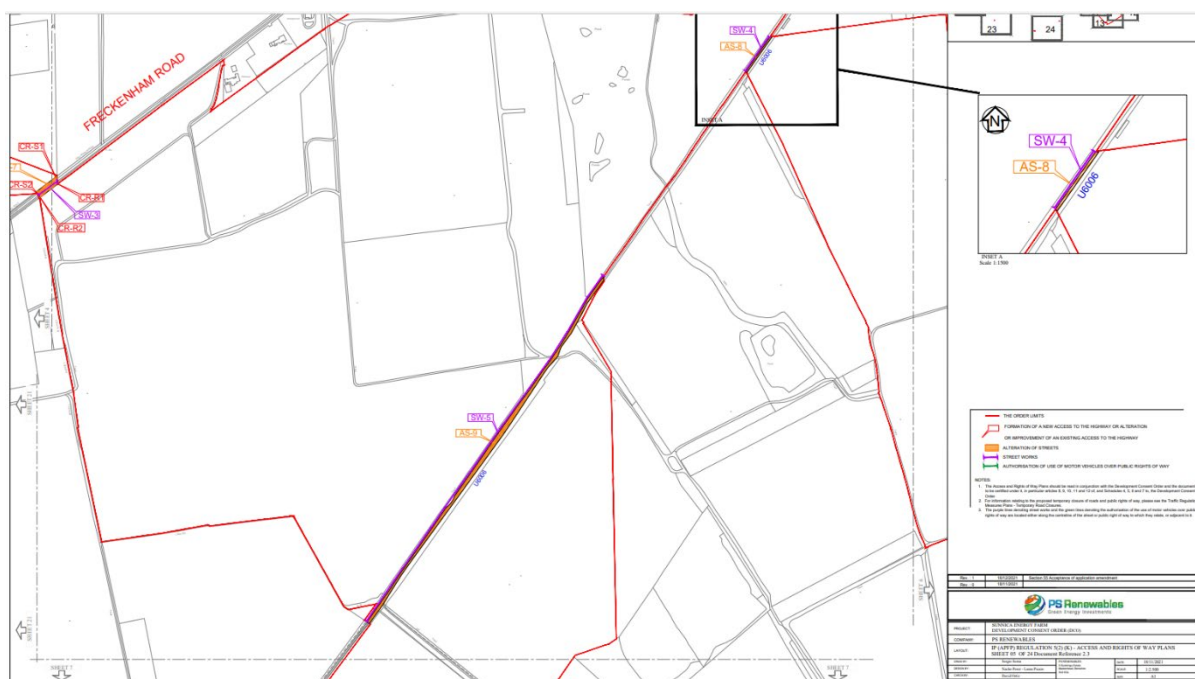
Bunbury (1778-1860) recalled that when he was a boy there was deep fen between Barton Mills, Tuddenham and Icklingham [Proceedings of the Suffolk Institute of Archaeology Vol 1, p250], covering the generally accepted Ordnance Survey route of the Icknield Way, so dryer routes would have been necessary. Whatever the origins of the lane, prehistoric, pre-Roman, or mediaeval, there is no doubt of its antiquity and long-term importance to the inhabitants of two pre Domesday settlements.

According to Tim Malim

The heritage significance of this very ancient route is clearly of high value, and it manifests itself as a physical asset in the landscape as the greenway/bridlepath that now exists. This is how it is valued by the public and how the heritage asset can be understood, appreciated and experienced in its setting [Personal communication].

Bat Survey: A bat survey of Badlingham Lane undertaken in August 2021 identified at least seven different species of bats: Common Pipistrelle, Soprano Pipistrelle, Noctule, Myotis species (probably Natterer's Bat), the Serotine and the nationally rare Barbastelle bat, recently Red Listed by the International Union for Conservation for Nature (IUCN) as **at imminent risk of extinction**, and the Leisler's bat **at near risk of extinction**. [The Bat Conservation Trust 30 July 2020]. The importance of maintaining foraging corridors and roosting sites is vital. Construction works which break the tree line or cause prolonged habitat disturbance will affect the survival chances of all the species we recorded and may contribute to the extinction of three of the species found there. Although various Tree Preservation Orders were imposed in March 2021 the draft DCO includes powers to override TPOs.

Construction Works: Sunnica intend closing the central section of Badlingham Lane 450m from the Worlington entrance and 700m from the Freckenham entrance, for an undefined period but is likely to be for the entire construction period, to allow for cable crossings and cabling along a large part of its length. See Access & Rights of Way plan below.

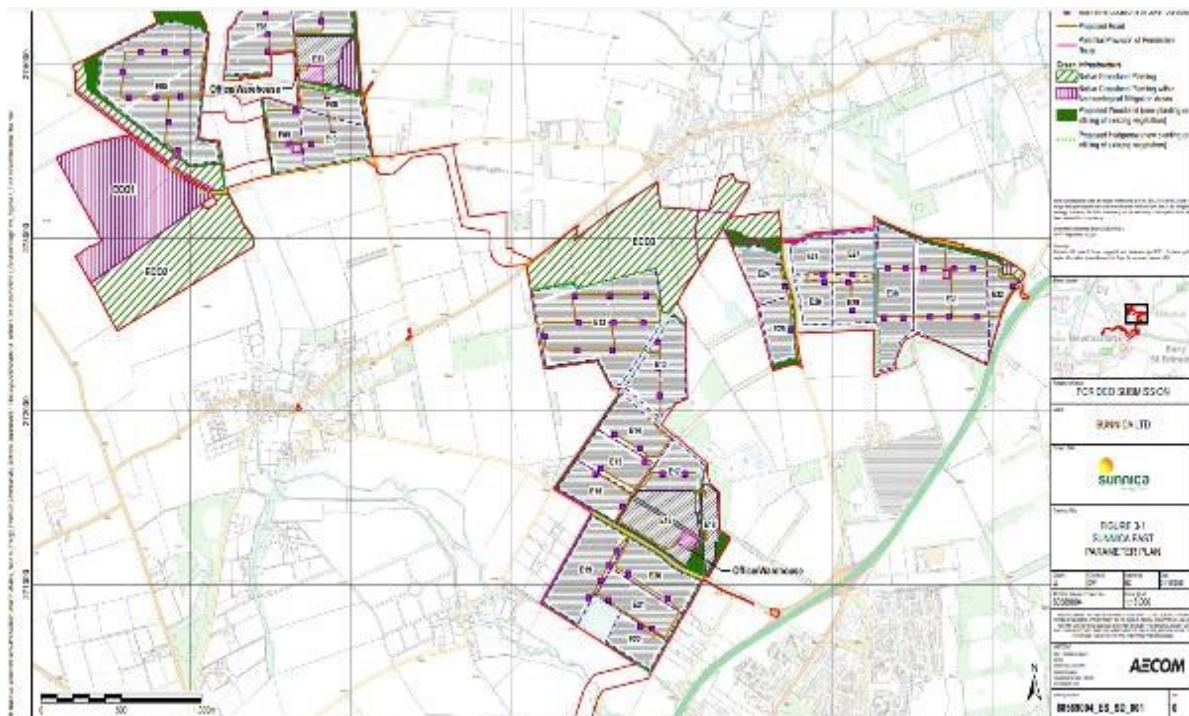


EN010106-002118-SEF_2.3_Access & Rights of Way

Works to be undertaken are described in Schedule 5, Article 9, p. 54, which states 'Works for the provision of a permanent crossing of the U6006 within the area shown hatched orange on the sheet 5 of the access and rights of way plans, ref. AS-8 and AS-9.

Schedule 4, Article 8, p.51, states 'Cable works beneath width of the highway for the **length** shown in purple on sheet 5 of the access and rights of way plans, ref SW-4 and SW-5. As can be seen from the plan, the length covers a considerable distance, on the ground equating to the woodland area bordered by Scots Pines. Despite verbal assurances from Mr Murray and Mr Chalmers that Sunnica has no such intention, works specified in the DCO would be allowed proceed as written. As the construction width required for cable corridors is up to 100m this will involve clearance of the trees and hedgerows. It will also put at risk a prominent Scots Pine on the Freckenham-Worlington boundary, which may be an historic boundary marker.

If works go ahead as outlined above, I fear we will be left with a sterile corridor, denuded of trees and hedgerows, enclosed by 2.1/2m high security fencing, crowded on either side by fields of solar panels. As can be seen from the Sunnica East Parameter Plan overleaf, there is no hedgerow restoration planned. The character of this well-used and much loved historic asset, together with any underlying archaeology, will be lost forever.



If the development goes ahead as planned, it will be a significant loss to the area. The nature and character of Badlingham Lane will be destroyed along with its long views and wildlife, and not just for the 24 months of construction. This could be avoided with a more considerate design where only one crossing point would be needed, at areas with already sparse tree cover. The suggested permissive paths are no substitute.

Domination of landscape: the vast size (c1000 ha) and fragmented design of the Sunnica Solar Scheme will dominate the landscape for miles around, visible even beyond Ely. In reality it is 4 separate schemes, or 7 if the BESS compounds and electrical substations are viewed as independent entities, linked by c.20km of underground cabling to the National Grid at Burwell, directly affecting 9 parishes across two counties: Isleham, West Row, Freckenham, Worlington, Badlingham, Red Lodge, Chippenham, Kennet, and Snailwell, plus the market towns of Mildenhall and Newmarket and the racing industry on which our area depends.

How can something of this magnitude not have a major impact on the area? It will detrimentally influence the lives, health, well-being and economy of everyone who lives here. Rural areas are not the most convenient places to live, they are expensive and lack amenities which townspeople take for granted but for those of us who have chosen to live here it is a price worth paying for beautiful views, green fields, open spaces, clean air, and being within nature.

This Scheme will deprive us of these benefits, changing the character of our landscape forever (40 years is not temporary, for anyone over the age of fifty, it will effectively cover the rest of their lifespan).

Our sense of place will be lost, individual parishes will be physically linked by fields of solar panels, divorcing historic villages from their settings, effectively creating one gigantic power plant.

That is what it will feel like on the ground because there will be no escaping it, visually or physically. Freckenham will be surrounded, every road out of the village will be impacted, if not immediately then before reaching our destination.

Change Even more detrimental is the speed with which this change will happen. Organic change is normal and can be adjusted to but this will be imposed on us in a comparatively short space of time, after which the landscape we have known and loved, in my case for over forty years, will be gone, changed forever.

Views will be significantly affected in the loss of trees and hedgerows and by inappropriate screening: a Breckland landscape is traditionally one of long views and open skies, this is what I value and the reason I moved here. Screening will take years to have any effect but will never be sufficient to block alien electrical substations from the skyline. Its industrial influence will be visible over a wide area - the miles of cleared vegetation above cable corridors will be a permanent eyesore and reminder of what we have lost.

Noise: East Site A is on rising ground to Freckenham. Burwell residents have complained for years about operational noise from the National Grid, and complaints have intensified since the construction of the new 50MW BESS. Relevant Representations complained of 'constant humming noise', 'significant low frequency roar', and 'noisier than what was promised' even for properties at 1500m distance, the same distance as my house from East Site A. [Relevant Representations 30 Jan, 27 Feb, 24 Feb, 2 Mar 2022]. I am very much concerned this will be our fate, especially in summer and at night, forcing us to keep windows closed, denying us healthy sleep, and the pleasure of listening to the sounds of the night, calls of Tawny and Little Owls, and waking to the dawn chorus. This is what living in the country means to me.

Traffic: the chaos of two years of construction is unimaginable. High volumes of additional traffic on our narrow roads will be dangerous for pedestrians especially on roads without footpaths. My access into the village necessitates walking an unpaved section of the B1102, on a steep incline between high banks facing a triple blind bend. It is dangerous but I risk it most days in order to walk my dog, otherwise I have to drive elsewhere. A wet weather walk is the Snailwell path adjacent to Godolphin's training ground which will be impacted by the scheme, so travelling will be difficult and its previously pleasant view of grazing Highland cattle will be replaced by acres of glass. My husband's day will be disrupted as he commutes to his office at the same time scheduled for arrivals and departures of Sunnica

staff. We are working communities – our economy will suffer if we are unable to keep traffic flowing and residents moving.

We experienced this sort of chaos in 2019 when the Burwell to Lakenheath electrical upgrade cable was buried beneath the B1102, resulting in inconvenience, delays, diversions, and extra fuel costs. With few routes choices – there are only four roads serving the village – diversions are inevitably extensive: one instance entailed a 7 mile diversion to get my dog to the vet in Mildenhall. These works were comparatively well organised and only lasted a few months not two years.

There is nothing positive about the Sunnica Solar Scheme. I strongly object to it on every level, its sprawling design will exert a malign influence over the landscape, transforming our productive agricultural land into an industrial power plant. There will be no gain to the community, on the contrary Energy Trading will increase costs to the consumer, everything is loss. Despite its NSIP status, it must not be forgotten that all this disruption and destruction would be for the private profit of a commercial enterprise.