

Worlington Parish council

Unique REF no: 20030919

Deadline 3a

Response to Written representations in regards to Sunnica Energy Farm application

As we have stated before, Worlington Parish Council (WPC) are in support of the Say No To Sunnica Action Group (SNTS). As a small rural Parish Council we have limited expertise on such matters involving Planning at a government level and we do not have the funds to finance our own individual reports. Along with the Parish Alliance (PA) SNTS advice and understanding have been invaluable during this procedure and we are grateful that such knowledgeable individuals have stood up against this application.

WPC have read the WR submission including Annexes from the SNTS and would like to highlight certain areas we feel reiterate WPC stance.

Social Value

WPC WR 2.5 Badlingham Lane U6006

“Also known locally as Green Lane. This PROW is of great importance to the village.”

SNTS WR Social Value 10.1.13

“U6006 Badlingham Lane, Freckenham-Worlington. ORVal estimates 38,925 visitors per year and a recreational value of £186,978 per year.”

Industrialisation

WPC WR 11.0 Visual Impact

“The applicant’s plan will effectively cut off and isolate our village from the countryside in which it sits and turn our view into one of an industrial aspect.”

SNTS WR 11. Impact on Tourism 11.1.18.

“It will industrialise the gaps between the villages of Isleham, West Row, Worlington, Badlingham, Barton Mills, Red Lodge to the north and east, Fordham to the west, Snailwell to the southwest, with Chippenham and Freckenham partially surrounded in or near the centre”

Is this a green scheme

Carbon Annex F, this whole document is a prime example on WPC limited knowledge.

WPC WR 10.0 Is this a green scheme,

There seems to be a high chance that this will in fact fail to be carbon neutral at all and actually be detrimental towards the UK’s net zero targets. The SNTS Action Group are making specific representation in this area and we WPC support their position on this.

SNTS Annex F - Carbon

“The chief findings are that:

- 1) Sunnica may have overestimated their energy output at 23.5 TWh, unless they are intending an installed capacity of at least 625 Mwp.
- 2) Sunnica’s methodology for calculating GHG (greenhouse gas) emissions throughout the lifecycle stages of the Scheme is not transparent and has led to an underestimation of the lifetime emissions of the scheme.

Applying reasonable estimations based upon the information published in the Sunnica ES, and making assumptions favourable to the scheme** when information is lacking, we conclude:

- The realistic energy output of the proposed scheme would be 17.7 TWh (based on a calculation using Global Solar Atlas, a solar estimation program provided by The World Bank). A 625 MWp scheme would be required to achieve Sunnica's quoted energy output of 23.2 TWh.
- We have recalculated the construction and operational emissions using the data provided in the Environmental Statement and fair assumptions. Our estimation for total emissions is higher than Sunnica's."

Biodiversity

WPC are very concerned in areas of biodiversity, in our own WR almost 25% (not including Appendix) was given over to our unique landscape, flora and fauna.

WPC support the SNTS Written Representation on Ecology Matters in its entirety.

SNTS Annex D - Ecology and Biodiversity

Table A: Position as regards adequacy of protected species information and impact assessments
Hobby

Hobby was heard calling in Sunnica East Site B on 13th July 2022.

WPC note that we failed to mention the Hobby with in our own report; though with in the SNTS report it clearly states they are present.

Landscape and Visual Impact

The Landscape and Visual Impact report by Michelle Blogger was partially financed by WPC so we support this document in its entirety.

In WPC WR 11.0 Visual Impact

"WPC is part of the Parish Alliance and contributed towards the landscape appraisal, we are aware The SNTS Action Group are making specific representation in this area and therefore WPC support their position."

SNTS Annex A - Landscape and Visual Impact

WPC, note; Worlington is mentioned 62 times over the whole 136 page document. Such mentions refer to our landscape, soil types and the impact this scheme will have that will directly affect our residents.

Below is an example of where Worlington has been mentioned.

7.16 The local landscape surrounding and including Sunnica East Site B:

"Distinctiveness: The site and surrounding landscape are representative of the landscape character described in the published landscape character assessments. In particular, the site's contribution to the rural character of the setting and approaches into local settlements, especially Worlington, is valued. "

BESS

Again this is an example where WPC, have lacked the knowledge and finance to submit our own findings for both BESS & Safety Planing.

WPC WR 7.0 BESS

“Sunnica wants to have an uncapped battery capacity – it is not clear if the batteries proposed are solely to support the scheme, or if they are seeking to max out their BESS compounds to do grid balancing.”

SNTS Annex H - BESS

5.1. There are many features in the Sunnica scheme where lack of detail indicates and supports that the BESS included within its application is a stand-alone commercial venture with little or no reliance on the solar facility. The BESS and electrical connection has the capacity to import and store energy.

Battery Fire Safety Planing

The Battery Fire and Safety document produced by SNTS is extremely in-depth and we are supportive of their findings.

WPC WR 8.0 Health and safety

“We were promised indicative plans of the BESS compounds at the Red Lodge PC meeting in March so we could at least try to understand how they have conducted their modelling and fire safety evaluations. Nothing came.”

SNTS Annex L - Battery Fire Safety Planning

“It is disappointing to note that, at this advanced stage in the application process, the Outline Battery Fire Safety Management Plan lacks all essential detail upon which a true assessment may be made.”

Freckenham Parish Council WR.

Freckenham is our neighbouring parish, there is little more than a mile between our residential dwellings. Therefore many of our concerns around the applicants proposal coincide.

FPC WR Impact of Sunnica on our community

“Our treasured rural views will be overlaid by hectares of glass panels, security fencing, huge battery compounds (31 ha in total) and 3 substantial 10 m high substations. There will be no escape, visually or physically, from this alien industrial landscape and this feeling of entrapment is not something that residents here are used to or wish to get used to. We rely on open access, both visual and physical, to avoid feeling isolated and for our health and well-being.”

U6006 Badlingham Lane connects our two villages.

The below is only part of an extensive well researched document on Badlingham Lane.

FPC WR U6006 (The Icknield Way, Badlingham Lane, Green Lane)

Badlingham Land is a remnant of the diminishing Breckland landscape. Its scenery is varied, transitioning from cultivated fields to wide open spaces and long views typical of Breckland, through enclosed woodland bordered by Scots Pines, into open heathland, to the lush verdancy of mature broadleaves and wide hedgerows of the designated County Wildlife Site at the Worlington end [Fig. 5]. There is also an area of open access under the Countryside & Rights of Way Act 2000 (CROW) at the Worlington entrance, approximating the site of the now dismantled railway [Fig. 8 pg. 12 coloured purple]. For a comparatively short lane of only 2.33km it is extraordinarily varied and full of interest

Conclusion

We find the SNTS written representation only enhances our own written representation with the expertises, knowledge and resources that we lack within our own.

Freckenham is our neighbour and we support them and their WR which WPC believe only emphasises the impact to our local area and communities.

WPC also mention here there will be many other WR that coincide with our own but due to time restrictions we have limited our response to the two we believe are most relevant to ourselves.