

Cambridgeshire County Council

ID Number 20031358

Sunnica Solar Energy Farm Planning Inspectorate Reference: EN010106

Written Summary of Oral Case for Cambridgeshire County Council Open Floor Hearing 1

December 2022

Introduction

My name is Cllr Lorna Dupré, and I chair the Environment & Green Investment Committee of Cambridgeshire County Council. It is this committee that is responsible for considering and approving the Council's submissions in response to those National Strategic Infrastructure Project applications in the Council area which relate to energy and waste projects.

Size and scale of the application

I need to start by pointing out the obvious, that this very large-scale application is of great significance to many residents across a large part of Cambridgeshire, and that elected members of Cambridgeshire County Council have been actively engaged with its progress since its earliest stages.

At 1,130 hectares or 2,792 acres, this application—if granted consent—would be the largest solar farm in the UK. Included within the red line are a total of eleven parish councils, six in Cambridgeshire and five in Suffolk. The effects of this development would be felt by communities across the Cambridgeshire-Suffolk border.

Our concerns, raised in July 2021 with the Secretary of State for Business, Energy & Industrial Strategy, consisted of the size and scale of this proposal on agricultural farmland; the effect of Covid restrictions then in force on opportunities for public engagement with the consultation, and the exclusion of some residents from the initial round of consultations; and the impact of the proposals on rural communities.

Climate and energy security

Cambridgeshire County Council declared a climate emergency in 2019, and earlier this year the Council's Joint Administration refreshed its Climate Change & Environment Strategy. The Council recognises the need to increase the country's energy security, to reduce dependence on fossil fuels, and to develop clean energy at pace and at scale.

However, the Council does not support this proposal as it currently stands. The applicant has so far failed to demonstrate that the proposals are deliverable, and the proposed mitigations sufficient.

Food security and competing land uses

Councillors also recognise the need to increase the country's food security, and that there are competing potential land uses for limited land resource. That is why we are supporting the Food Farming & Countryside Commission in its pilot work in Cambridgeshire on a Land Use Framework.

Cambridgeshire is part of a vital agricultural region, with its excellent soil making it an important location for a wide variety of crop and horticultural production.

We therefore remain concerned that the Agricultural Baseline Report appears inconsistent with local knowledge and evidence about the quality of land within the application boundary. The agricultural specialist employed by the Action Group—who have submitted their own representations—to review the report is one used by the Council, whose work the Council therefore finds credible.

We are concerned at the adequacy of the existing assessment of Best and Most Versatile agricultural land supplied by the applicant. We therefore welcome the

fact that this is to be discussed as part of the Issue Specific Hearing on Thursday 8th December.

We note that Grade 3 soils in Cambridgeshire can produce a greater range and yield of crops than Grade 3 soils in other areas of the country, albeit using irrigation. We believe that the loss of land capable of food production, and the productivity of the soils, is less well documented in the application.

Biodiversity

Cambridgeshire is one of the least biodiverse counties in the country, and protection of the area's ecology and habitats is therefore extremely important to us.

The Environmental Statement provides inadequate detail in its assessments to determine if the mitigation measures proposed for this project are sufficient; and more evidence is needed to demonstrate the Biodiversity Net Gain. It is essential this is addressed prior to decision, otherwise the consented development is likely to result in avoidable ecological impacts.

The Council is concerned that the impact of Battery Energy Storage System fire safety measures on watercourses and hydrologically linked wildlife sites, wetland habitats and associated species has not been adequately assessed.

The Construction Environmental Management Plan does not provide sufficient details to demonstrate that biodiversity will be adequately mitigated through the construction phase; and the Decommissioning Environment Management Plan provides insufficient details of the decommissioning phase to determine whether the scheme will result in long-term adverse impact on biodiversity. The Council is concerned that no long-term management or monitoring for these

habitats, or compensatory habitat or reinstatement of original habitats, is created as part of the decommissioning phase.

Transport and access

The local highway network in the application area consists of rural roads, many narrow, with poor surface quality and subject to the national speed limit.

Construction and decommissioning will have significant effects, and sufficient mitigation to ensure highway safety is needed, in agreement with the Local Highway Authority.

Public rights of way

Given the size and impact of this scheme, we are disappointed that opportunities to enhance public rights of way have not been realised. The creation of permanent new rights of way would deliver not only connectivity but also long-term health and wellbeing benefits to the community. The Council has also raised concerns about visual and noise impacts of aspects of the scheme on users of public rights of way.

Cultural heritage and archaeology

A number of archaeological interests and mitigation areas have been assigned, and we need details of how they are to be managed to ensure suitable protection over the forty years of the scheme. We have expressed significant concerns about the proposed construction timescales particularly in areas of the

site which are yet to be fully archaeologically investigated.

Flood risk, drainage and water resources

And finally, the County Council as the Lead Local Flood Authority will want to see more detail of the proposed Sustainable Drainage Systems features.

Conclusion

I'm grateful for the opportunity to raise our very significant concerns with the Examining Authority.