



SUNNICA ENERGY FARM
DCO EXAMINATION
SUMMARY OF WRITTEN REPRESENTATION

SAY NO TO SUNNICA ACTION GROUP LTD
11 NOVEMBER 2022

1. Introduction

- 1.1.1. The Say No to Sunnica Action Group Limited (SNTS) is an interested party (ID No **20031080**) in the DCO examination. This document is a summary of the written representation made by SNTS into Examination.
- 1.1.2. SNTS is not opposed to the construction of photovoltaic (PV) generation in the United Kingdom. SNTS similarly supports the effective use of suitable land for solar projects.
- 1.1.3. However, SNTS is opposed to the Sunnica scheme, at least as currently designed, because it is not an effective use of land which properly avoids significant harm to the location and local communities.
- 1.1.4. SNTS say that it is the design of this scheme placed in this proposed location which makes Sunnica a proposal that should not be consented.

2. Cumulative Impact

- 2.1.1. Because Sunnica is exceptional (if consented, it will be by a considerable margin the largest PV-generating installation in the UK), the impact that it has on the location and the communities around it is very significant.
- 2.1.2. As the overall scheme is split into more areas, the amount of land and the number of people affected by the scheme increases. Siting compounds and solar sites between and close to a number of closely related historic villages cause significant and detrimental industrialisation of a wholly rural area.
- 2.1.3. The perimeter of the scheme, and thus the number of people directly affected by its presence and appearance, is vast when compared to one contained site. It means that the scheme dominates the landscape because it is not contained; it is spread across it and engulfs locations. Its design necessarily maximises the possible harm to the location and local communities by being sizeable in both area and perimeter, degree of change and impact on communities.
- 2.1.4. At its purest, therefore, the scheme is an example of bad solar and an example of exceptionally poor design

- 2.1.5. By having such a massive scheme spread over such a considerable area, harms are maximised in a way that will significantly and for many generations damage local communities and the way that they function both socially and in their reliance on tourism and investment in racehorse training, economically.

3. Landscape and Visual Impact

- 3.1.1. SNTS concludes on the basis of expert advice that the proposal would result in major adverse effects on the visual amenity of a number of users, including people who use the local PRoW network, visitors to the Limekilns and users of a number of roads in the area.
- 3.1.2. The proposed mitigation planting will, after a period of 15 years, lessen the views of the infrastructure to varying degrees, but it will not restore the current visual amenity, and in places, the mitigation planting will restrict existing open views.
- 3.1.3. There are several places within the submitted landscape and visual impact assessments of the applicants that underestimate the harm that the proposals would cause. There has been a failure to identify the most valuable aspect of the landscape and, therefore, to adequately assess the impacts on these aspects.
- 3.1.4. There has been no consideration of the landscape impact in wintertime, a major failure and absence of information but one which clearly undermines the conclusions reached on the information submitted.
- 3.1.5. Assessment of the proposed BESS development in compounds has been inadequately considered, including failure to have proper regard to the latest information concerning the need for substantial built development in the countryside.
- 3.1.6. The mitigation measures proposed in the Outline Environmental Management Plan will do little to improve this because the fundamental issue relates to the location of the development sites.
- 3.1.7. The development does not show good design in terms of siting relative to existing landscape character, landform and vegetation; the opposite is true. The development fails to accord with NPPF as it fails to recognise the intrinsic character and beauty of the countryside.
- 3.1.8. It would not protect nor enhance the valued landscape, which includes the Limekilns and Chippenham Park in the case of Sunnica West Site A.

- 3.1.9. Contrary to the Development Plans of West Suffolk and East Cambridgeshire, the development would, due to its location and scale, result in significant, long-term harm to the character of the landscape, including the setting of settlements.
- 3.1.10. It would not be consistent with policy ENV 1 of the East Cambridgeshire Local Plan as, due to its location and scale, it would fail to protect, conserve, or enhance space between settlements and their wider landscape setting, key views into and out of settlements and the unspoiled nature and tranquillity of the area.
- 3.1.11. Overall, the proposals conflict with the relevant national policy statements and national and local landscape policies.

4. Heritage Impact

- 4.1.1. The expert report commissioned by SNTS makes it clear that the construction of the Sunnica Energy Farm will have a negative impact on the significance of a number of designated and non-designated heritage assets.
- 4.1.2. The Applicant's own assessment identifies that several of these impacts are of sufficient magnitude to be considered 'significant', and in many cases, it is apparent that the Applicant's assessments understate the full extent of the impact.
- 4.1.3. Once lost, heritage assets cannot be replaced, and their loss has a cultural, environmental, economic, and social impact. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting.
- 4.1.4. Substantial harm to or loss of designated assets of the highest significance, including Scheduled Monuments; grade I and II* listed buildings; grade I and II* registered parks and gardens, should be wholly exceptional.
- 4.1.5. The identified cultural heritage impacts affect numerous Scheduled Monuments, a Registered Park and Garden, several listed buildings, surrounding Conservation Areas and the historic Limekilns Gallops.
- 4.1.6. The scheme will also have a considerable impact on the extensive archaeological deposits which survive within the proposed development area.

- 4.1.7. The identified heritage impacts range from negligible to major, with particularly significant adverse impacts identified on the scheduled Chippenham Barrow Cemetery, the Grade II registered Chippenham Hall Park, and the Grade II* listed southern lodges and triumphal arches at the southern entrance to the park.
- 4.1.8. In every case, these impacts constitute 'less than substantial harm' to the significance of each heritage asset, with the instances singled out sitting at the top of the 'less than substantial' scale.
- 4.1.9. Under the existing suite of planning legislation and policy, it is required that this 'less than substantial harm' be weighed against the wider benefits of the DCO application. In doing so, 'great weight' should be given to the conservation of the heritage assets concerned, and the more important the assets, the greater that weight should be.
- 4.1.10. Both the Applicant's own assessment presented in the Environmental Statement and our Expert's assessment concluded that the development of the Sunnica Energy Farm will result in multiple instances of adverse heritage impact, which cannot be mitigated.
- 4.1.11. As such, considerable benefits will need to be demonstrated to justify the approval of a DCO Application which will result in such high levels of harm to so many designated and non-designated heritage assets.

5. Agricultural Impacts

- 5.1.1. The impacts of the proposed development on the agricultural land resource are based on the assumption that the development is judged to be merely a temporary use, despite a projected, lengthy 40-year plus timespan.
- 5.1.2. The land resource is assessed by the Applicant to be of low sensitivity to change due to the predominance of land of less than BMV quality in the ALC identified in the baseline. The limited extent of land of BMV quality stated as being affected by the proposed development is contested on the basis that the constraint of droughtiness on some land has been exaggerated and that the ability of land to be irrigated has been discounted.
- 5.1.3. The Applicant claims that the land will improve from being "rested". This fails to take into account that the land will continue to be accessed and subject to repeated vehicle movements for the construction of the scheme, driving steel stanchions into potentially tight

chalk rock in some areas and the potential for mixing soil and substrates when removing those stanchions, and subsequent management of the land and infrastructure along routes necessarily prescribed by the layout of the development with compaction consequences.

- 5.1.4. No information is provided about the feasibility of the establishment and management of the grassland on established productive arable soils, other than vague references to sheep.
- 5.1.5. No evidence has been advanced based on the monitoring of decommissioned or existing solar facilities or similar developments to support the contention that there are no negative impacts arising from the prolonged change in the environment of the land, or if such impacts were likely, how they might be mitigated.

6. Agricultural Land Classification

- 6.1.1. Natural England has confirmed that the guidelines on the assessment of agricultural land quality published in 1988 and including the availability of irrigation as a positive determining factor, remain extant and unqualified.
- 6.1.2. The extent of land of BMV quality affected by the proposed development has, therefore, been understated. Contrary to the Applicant who has assessed that the proportion of BMV land is just 3.8%, the experts employed by SNTS assess that the true proportion is at least 50% of grades 2 and 3a.
- 6.1.3. It is generally accepted that high-quality productive agricultural land is an asset to the Country and as such it is protected in Government Guidance and Policy, including the National Planning Policy Framework (NPPF)⁷ and the Draft Overarching National Policy Statement for Energy (EN-1).
- 6.1.4. This is reflected in Solar Energy UK's ten commitments to best practice, which state in their first guideline that, inter alia, developers "will focus on non-agricultural land or land which is of lower agricultural quality"
- 6.1.5. The Applicant has failed to demonstrate that there is no alternative to development on Best and Most Versatile (BMV) land. This is not in accordance with NPS EN-1:
- 6.1.6. Consequently, in accordance with the NPPF and emerging Government policy on food security (Section 13 in this representation) development of the land for non-agricultural use should be rejected.

7. Ecology and Biodiversity

- 7.1.1. Independent expert checks have been made of the accuracy of much of the baseline habitat survey work presented in the submitted Environmental Statement and in the accompanying appendices and drawings.
- 7.1.2. The effect of these errors is to undermine the reliability and robustness of both the impact assessments and the Biodiversity Net Gain calculations presented by the Applicant.
- 7.1.3. SNTS maintain that the Applicant's submissions on ecology, as encompassed within ES Chapter 8 and the suite of supporting documents, fail to present a sufficiently accurate representation of the baseline ecological interest present within the proposed order limits.
- 7.1.4. Correction of the errors we have identified calls into question the overall compliance of the scheme with national policy to avoid net biodiversity loss.
- 7.1.5. Similarly, the mitigation and compensation proposals offered in the Applicant's submission material, being founded on an incomplete understanding and/or representation of the baseline position and an, at best, optimistic view of the delivery challenges they will face, cannot in their present form be relied upon by decision-makers as a safeguard to avoid the project ultimately giving rise to a significant net loss of biodiversity.
- 7.1.6. The overall conclusion to be reached is, therefore, that it is not possible to determine whether net harm to biodiversity would be avoided by the proposed scheme and that the Examining Authority is, therefore, not in possession of sufficient information to determine whether relevant policies and the duties of the NERC Act 2006 placed on the Secretary of State could be met if the scheme were approved.

8. Horseracing Industry

- 8.1.1. Newmarket is of local, regional, national and, in some cases, international significance because of its longstanding and inextricable association with the horseracing industry.
- 8.1.2. It is likely to be more vulnerable today than at any point in recent history due to the threats to it and pressures on it, particularly from development.
- 8.1.3. The impact of the Sunnica development creates a threat to Horseracing from:

- a) Loss of investment;
- b) A resulting contraction of the industry;
- c) Loss of some or all of the gains made in the last 30 years during which Newmarket has reasserted itself as the preeminent racehorse breeding, training and racing centre in the world;
- d) The risk of a downward trend that could take many years to halt and reverse.

8.1.4. The significance of the nature found in Newmarket and its horseracing industry is rare and it goes without saying that it must be valued and protected.

8.1.5. The key policy, in the East Cambridgeshire Local Plan, states unequivocally that development that would threaten the long-term viability of the horseracing industry will not be permitted.

8.1.6. Further, the West Suffolk Local Plan, also offers a high level of protection for the horseracing industry and stipulates that the benefits of development must significantly outweigh the harm the development would cause for it to be permitted.

8.1.7. Had the proposed development's impact been assessed by the Applicant it would have been shown to be significant and, at the very least, it would have been shown to threaten the long-term viability of the industry.

9. Harm to Local Communities

9.1.1. There are various features of planning policy important to the harm that is done to residents around developments.

9.1.2. When the Written Representations, OFHs and ISHs take place, SNTS is of the view that the evidence provided will support this interpretation (and we will comment on that evidence at the relevant time).

9.1.3. The development is only temporary in the sense that it is one day planned to be decommissioned; It will be in operation for over a generation, and for anyone over a certain age, then in all probability, they will not see it decommissioned in their lifetime.

9.1.4. The harm to local communities is significant. These factors should weigh heavily against the scheme in the planning balance.

10. Skills and Employment

- 10.1.1. The economic impact of horse racing on Newmarket is significant. It was estimated in 2014 that 8500 direct and indirect jobs in the area are dependent on racing.
- 10.1.2. The Applicant has not assessed the impact of the development on racing.
- 10.1.3. SNTS says that employment benefits during construction and decommissioning are only transient and in the case of skilled jobs, likely to use skills from outside the area.
- 10.1.4. The gain of jobs during operation is poor compensation for the impact of this development on the local area and loss of jobs.

11. Impact on Recreation

- 11.1.1. At the highest level, the changes to setting throughout the area will influence and (so say SNTS) damage the use of open recreational areas.
- 11.1.2. The evidence suggests that this will harm the recreational use of the area around the scheme as people feel it is no longer rural. The harm to public rights of way by the scheme is considerable.
- 11.1.3. The introduction of solar panels will fundamentally change the setting of these rights of way. Glimpsed views and enclosure of public rights of way to hide solar panels will degrade the quality and amenity of the public rights of way.

12. Impact on Tourism

- 12.1.1. 2017 saw a record-breaking year for the home of Horseracing, with Newmarket welcoming over 1.6 million visitors, which boosted the economic value of tourism in the town by 6% to a total in excess of £73million.
- 12.1.2. There are insufficient rooms in Newmarket to meet demand during many summer weekends, and many visitors prefer in any event to travel out to neighbouring villages to stay in pubs with rooms and hotels located in the charming historic villages of the area.

- 12.1.3. The Sunnica proposals extend in large blocks within some 1000 Ha, much of which is to be filled with solar panels and large battery containers or substation machinery, like that found next to a container port, not in the heart of the Suffolk and Cambridgeshire countryside.
- 12.1.4. It will, without a doubt, have a huge negative effect on tourism of the area and the village pubs and businesses reliant on tourism in this area will be very hard hit and will be unable to recover.
- 12.1.5. The Sunnica proposals extend their impact well beyond the ugliness of solar panels and industrial compounds in the countryside.
- 12.1.6. If the Sunnica scheme is consented long term severe damage would be done to tourism of this important and unique tourist attraction and the businesses and communities that rely upon it by the Sunnica proposals.

13. Carbon

- 13.1.1. Contrary to the claim of Sunnica, the scheme cannot reach net zero carbon emissions within its lifetime and is in fact a net-emitter of CO₂. This was the assessment of a team at Cranfield University.
- 13.1.2. Considering policy in favour of food security, a scheme which does not even meet net zero overall becomes a scheme for which it is hard to justify the land take from agricultural use.
- 13.1.3. This must be a factor which weighs against the scheme in the planning analysis; food security is an important part of government policy, and it would be an error to ignore it in light of the Cranfield report.
- 13.1.4. SNTS understands the policy objective that the government seeks to achieve in respect of renewable generation and carbon neutrality. However, due to poor design, SNTS say that the scheme does not fall into the category of generation that benefits from those policy objectives.
- 13.1.5. A reasonable assessment of the scheme predicts that the scheme will produce more carbon than it saves over its lifetime compared to the grid over the same period (be carbon net positive).

13.1.6. In those circumstances, the ExA should not take weight from the policy guidance said in the Statement of Need to be supporting the scheme.

14. BESS as Associated Development

14.1.1. Importantly, the losses of electrical energy in the rectification and inversion of electricity is significant. The Applicant's position is that the maximum constraint on the BESS is the land made available in the scheme for such installation.

14.1.2. However, as part of the application no specific detail about the use of the BESS is set out. The evidence suggests that the potential maximum capacity of the BESS is way out of proportion with the generating capacity of the scheme.

14.1.3. The available maximum capacity is entirely consistent with the idea that most of the capacity will be for uses unrelated to the PV generation of the scheme. SNTS view is that the BESS, assessed on a reasonable worst-case basis, is not associated development.

14.1.4. Importantly, in the current position with the current draft DCO, SNTS is of the view that the BESS cannot lawfully be consented as associated development under the 2008 Act.

14.1.5. The question of whether the BESS is associated development is required to be answered as it is a legal requirement for the consenting process under the Planning Act 2008.

15. BESS Planning and Safety

15.1.1. While part of the decision on the capacity of the batteries to install is one of good design, capacity is still an issue insofar as higher capacity batteries entail planning harms that are more significant.

15.1.2. Further, as was discussed in the section on the BESS as associated development, as the capacity increases the uses to which the BESS are put will increasingly not be related to the PV generation. In the section on associated development, the Applicant accepts that BESS is not necessary for the construction of the PV generating part of the scheme.

15.1.3. SNTS say that, whether the capacity must be limited because of the requirement for it to be associated development or not, a capacity limit should be imposed to ensure that it is an appropriate size for the location.

- 15.1.4. SNTS's position is that there were serious flaws in the original Outline Battery Fire Safety Management Plan, and that as a result significant work would have been required to mitigate the risks. The Applicant has now indicated that it may seek hazardous substance consent in the future.
- 15.1.5. This failure matters because items such as the Outline Battery Fire Safety Management Plan will be approved as part of the DCO process.
- 15.1.6. Details are missing from the application as currently written, which is a significant flaw for any hazardous substance consent application.

16. Decommissioning

- 16.1.1. SNTS says that more detail on decommissioning is needed in this application for the ExA to be satisfied that the use is truly temporary and that it can and will be fully restored to agriculture.
- 16.1.2. Currently, the scheme lacks a general decommissioning plan (even in a framework form) and does not have parameters against which successful decommissioning will take place.
- 16.1.3. Such a plan is crucial as, currently, the ExA cannot be satisfied that decommissioning will return the site to its prior nature and use. It can only be satisfied that this will be done from an environmental perspective in compliance with the Framework Decommissioning and Environmental Management Plan.
- 16.1.4. First, there is insufficient obligation to return the land to pre-existing agricultural use. SNTS says that contrary to the position of the Applicant, much of the site includes agricultural land of Best and Most Versatile quality. This land in any case is valuable in the range of crops that it can grow and the yields it can produce. To not secure such a return is to fail to meet the aims of the Government's Food Strategy (published 13 June 2022).
- 16.1.5. Taken in the round, it would be an ineffective and inefficient use of land, which minimises its value, to leave the land damaged and unusable for its original purpose following the decommissioning of the scheme.
- 16.1.6. From a local planning perspective, if the land is not returned to agriculture, it is then previously developed land.

- 16.1.7. Aside from the generality of returning much of this land to agriculture, there is also the specific consideration that the quality of the agricultural land should be returned to its prior state.
- 16.1.8. There is nothing in the decommissioning provisions in the application to ensure a return to the same land quality, nor nothing to require the Applicant to replace and reinstall lost infrastructure.
- 16.1.9. Thus, the return is necessary not only to ensure effective use of the land at the end of the scheme but also to support local communities and avoid permanent impact and decline.
- 16.1.10. SNTS say that the DCO should include a Requirement that if the solar farm has not generated any energy for a period which SNTS say should be a maximum of 2 years that this will trigger decommissioning.
- 16.1.11. The Sunnica scheme is planned to operate for a longer period than most UK solar facilities (40 years instead of 25).
- 16.1.12. SNTS says that there are very real risks of operator failure, and a decommissioning bond must be provided to avoid the costs of decommissioning in the event of business failure falling on local communities and the public purse.

17. Assessment of Alternatives

- 17.1.1. The assessment of alternatives undertaken by the Applicant is not robust and starts from a pre-determined conclusion.
- 17.1.2. The Applicant states that East Anglia is the optimal region in the UK to locate a large-scale solar farm due to high levels of irradiation compared to other parts of the UK and that it is characterised by large flat open land. There are other areas for which this is also true and the distribution of solar energy projects indicates that other parts of the Country are equally suitable.
- 17.1.3. The Applicant says that East Anglia is located near high-demand centres for electricity e.g. Cambridge and London. However, the facility will be connected to the national transmission grid, making it usable anywhere in the UK. There is no need for a power station to be close to centres of consumption as it is the purpose of the electricity grid to convey power from where it is generated to where it is used.

- 17.1.4. Proximity to London and Cambridge or any other area local to a scheme is not demonstrated to be a valid criterion for site selection unless the power generated by an electricity scheme is exclusively for that area.
- 17.1.5. That the Applicant has failed to properly rationalise its decisions is indicative of the backwards manner adopted in selecting Burwell as the substation. The use of a 3% criterion for site selection is unduly restrictive, and the lower bound gradients are primarily based on limiting visual impact rather than solar efficiency.
- 17.1.6. The Applicant has constrained the search by applying a criterion of a minimum area of 38Ha of land being needed for large-scale solar without any evidence to justify this figure or other selection criteria.
- 17.1.7. It has not been demonstrated that large-scale solar is a more effective or efficient use of land than agriculture. The options assessment is flawed, and it would be irrational to suggest that this options assessment weighs in favour of the scheme.
- 17.1.8. Remote substations point – this, in fact, proves the poor location and design of the Sunnica scheme here compared with other sites and locations without remote solar and batteries.
- 17.1.9. None of these are monetarised or mitigated/compensated sufficiently and are to be weighed in the balance against these monetary costs which are of no significant weight without evidence and CoBA of comparative sites.
- 17.1.10. SNTS say it is sufficient for the purposes of the ExA to note that far less constrained locations have been disregarded on a flimsy basis. Thus, the ExA should give no weight to the need basis for the land; indeed, the availability of other options which have not been considered should weigh against the scheme as a whole.

18. Consultation

- 18.1.1. Flaws in respect of the Applicant's approach to consultation have been a consistent feature of this scheme.
- 18.1.2. As locals have been deprived of that proper consultation, the Applicant (and, ultimately, the ExA) have been deprived of the fruits of a proper and successful consultation. As the ExA will see on an examination of the evidence produced by SNTS, both consultations undertaken as part of advancing this application have been flawed.

- 18.1.3. SNTS are of the view that engagement with the application, and the quality of the replies, have been significantly hampered by the difficulties that locals have faced in making their views known. Locals have been deprived of an opportunity to give intelligent consideration and intelligent responses to the scheme in the consultation stage.
- 18.1.4. Those flaws were significant in the statutory consultation, and many of them were repeated as part of the new consultation held in 2022 (concerning the change of the approach to connection to Burwell).
- 18.1.5. SNTS is of the view that many of the flaws in the application and failures to properly avoid serious planning harm can be attributed to the failure to consult properly.
- 18.1.6. A community-led approach is likely to create a scheme which responds more effectively to local needs, minimising harm through avoidance and mitigation. Community involvement is now the direction of Government policy in locating renewable energy schemes.

19. Traffic

- 19.1.1. The approach is set out for people working on site to be required to park in one of the two centralised car parks and then travel to work sites by mini-bus. It is highly probable, therefore, that the permit system will result in nuisance parking in nearby villages where workers who do not have a permit will park to be picked up and hence achieve the mandated occupancy on arrival.
- 19.1.2. Considering the number of people working on such a site, it is likely that staff will need to be ferried in between the main compounds and the working sites continuously throughout the day.
- 19.1.3. The routing of construction traffic through villages is unjustified when traffic could be routed through the site via the cable route. In particular, SNTS object to the use of Short Road, Snailwell.
- 19.1.4. The only reason for not doing so would be the cost which would be moderate, requiring that the haul road required for the cable route construction be semi-hardened for serviceability in all weathers.
- 19.1.5. SNTS say that the use of internal haul roads should be maximised and the use of unclassified roads minimised.

20. Compulsory Acquisition

- 20.1.1. SNTS refers to the finance reports that have reviewed the financial standing of the Applicant Sunnica Ltd and its funder Solaer Holding and the adequacy of the Funding Statement.
- 20.1.2. SNTS has significant concern over the ability of Sunnica Ltd and its funder to fund the development and discharge financial obligations such as compensation to be paid to landowners whose land may be compulsorily acquired.
- 20.1.3. The ExA cannot be assured based on the information provided that Solaer Holding will fund Sunnica Ltd as there is only a reference to the assets held by Solaer Holding and no visible commitment from Solaer Holding to fund the project beyond its existing commitment.
- 20.1.4. A statement that Solaer Holding will be able to fund Sunnica from its own resources when the amounts are unknown is of no reassurance to the ExA.
- 20.1.5. Compulsorily acquisition of the land can only occur if Sunnica can demonstrate that there are no reasonable alternatives. This the Applicant has failed to do.

21. Conclusions

- 21.1.1. There is no doubt that this application is flawed. It is based on an incorrect assessment of agricultural land classification indicating a low proportion of BMV land when the opposite is the case.
- 21.1.2. The landscape and visual impact is also badly flawed. The heritage assessment consistently underestimates the impact on heritage features.
- 21.1.3. The Applicant has incorrectly assessed the ecology and biodiversity and significantly over-estimates the biodiversity net gain of the development.
- 21.1.4. No account has been taken of the dominant economic activity in the area, that of horse racing and breeding and the unique dependency of Newmarket on this industry to the exclusion of others. Concomitant with racing is tourism and the value created by tourism activity on the back of the racing heritage and unique landscape.
- 21.1.5. The scheme causes as a result of its unusual design harm to local communities that cannot be mitigated.

- 21.1.6. A major driver of the scheme is said by the Applicant to be achieving carbon neutrality and assisting in UK travel towards "Net Zero". Yet the scheme is not carbon neutral over its lifetime; in fact, over the 40 years it will be in operation, it will generate more carbon emissions than it saves.
- 21.1.7. The scheme provides for an unquantified amount of Battery Energy Storage. SNTS considers the quantity to not be consistent with Associated Development under Planning Act 2008.
- 21.1.8. Inadequate attention has been given to decommissioning and how the site will be restored. The ExA cannot accept the scheme as being temporary without assurance that it will be fully restored to agriculture.
- 21.1.9. The assessment of alternatives is weak and lacks any sense of a sequential assessment as options are funnelled down to a shortlist. The assessment is transparently based on a pre-determined outcome, and the resulting unusual site layout is entirely the result of land availability criteria and nothing else.
- 21.1.10. Based on the financing concerns and the lack of a robust demonstration that there is no reasonable alternative, the ExA must recommend against granting compulsory acquisition powers.
- 21.1.11. Taken in the round, the planning balance is strongly against the granting of development consent for this scheme.