



SUNNICA ENERGY FARM

EN010106

Volume 5

Reports/Statements

5.2 Consultation Report Appendices A-1 – A-4

APFP Regulation 5(2)(q)

Section 37(3)(c) Planning Act 2008

Infrastructure Planning (Applications: Prescribed Forms and
Procedure) Regulations 2009



18 November 2021
Version: 00

Planning Act 2008

**The Infrastructure Planning
(Applications: Prescribed Forms and
Procedure) Regulations 2009**

**Sunnica Energy Farm
Development Consent Order**

Consultation Report Appendices

Regulation Reference:	Regulation 5(2)(q)) and Planning Act 2008 section 37(3)(c)
Planning Inspectorate Scheme Reference	EN010106
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Author	Sunnica Energy Farm Project Team

Version	Date	Status of Version
Rev 00	18/11/21	Application Version

Appendices

Table of Contents

Appendix A-1: Leaflet introducing Sunnica	3
Appendix A-2: List of organisations consulted as part of the non-statutory consultation	5
Appendix A-3: Consultation materials published for the non-statutory consultation	17
Appendix A-4: Copies of stakeholder written responses received for the non-statutory consultation	63

Appendix A-1: Leaflet introducing Sunnica



The leaflet features a green header with the Sunnica logo and a central photograph of solar panels in a field under a blue sky with white clouds. The text is arranged in a clean, modern layout with white and orange accents.

sunnica
energy farm

Public consultation
17 June 2019 – 28 July 2019
Sunnica Ltd would like to invite you to take part in a public consultation on its proposals for a new energy farm connecting to the National Grid at Burwell in Cambridgeshire.

Sunnica Energy Farm would be located across three separate sites - Sunnica East, located close to Worlington and Freckenham, Sunnica West A, located close to Chippenham, and Sunnica West B, located close to Snailwell. These will be connected to each other and the National Grid using underground cables.

It would allow for the generation, storage, import and export of up to 500 megawatts (MW) of electrical capacity. This has the potential to meet the energy needs of around 100,000 homes.

Due to its generating capacity, it is classified as a Nationally Significant Infrastructure Project (NSIP).

Find out more

We will be consulting between **17 June 2019 and 28 July 2019**. We would like to know what you think about our scheme proposals.

We are holding a series of public exhibitions as part of the consultation to help people find out more about our proposals.

At the exhibitions, you will be able to view information about the proposals and speak to members of the project team.

Venues

Friday 21st June
Worlington Village Hall
3:30pm – 7:30pm

Saturday 22nd June
Red Lodge Millennium Centre
12:00pm – 4:00pm

Friday 28th June
Chippenham Village Hall
3:30pm – 7:30pm

Saturday 29th June
Freckenham Village Hall
2:00pm – 6:00pm

Tuesday 2nd July
Mandeville Hall, Burwell
3:30pm – 7:30pm

Thursday 11th July
West Row Village Hall
3:30pm – 7:30pm

Wednesday 17th July
Fordham Victoria Hall
3:30pm – 7:30pm

Friday 19th July
The Beeches, Isleham
3:30pm – 7:30pm

Share your views

You can share your views by completing our consultation questionnaire by the closing date of 28 July 2019. You can do this online, at one of our events, or returning a completed form by post.

This is a non-statutory consultation. We are carrying it out in advance of the statutory consultation we're required to carry out on the scheme under the Planning Act (2008) because it is an NSIP.

Your comments will be analysed by Sunnica Ltd and any of its appointed agents. Copies may be made available in due course to the Secretary of State, the Planning Inspectorate and other relevant statutory authorities so that your comments can be considered as part of the Development Consent Order (DCO) application process. We will request that your personal details are not placed on public record and will be held securely by Sunnica Ltd in accordance with the data protection law and will be used solely in connection with the consultation process and subsequent DCO application and, except as noted above, will not be passed to third parties.

More info:

We will also make copies of a booklet with information about the scheme and questionnaires available online and at the following locations during the consultation:

Burwell Library
Village College, Burwell, CB25 0DU

Mildenhall Library
Chestnut Close, Mildenhall, IP28 7NL

Newmarket Library
1a the Guineas, Newmarket, CB8 8EQ

You can find out more at our website, www.sunnica.co.uk, or by contacting us directly on info@sunnica.co.uk or 08081 687 925.

Appendix A-2: List of organisations consulted as part of the non-statutory consultation

Description	Consultee
Host local authority	Suffolk County Council
Host local authority	Cambridgeshire County Council
Host local authority	East Cambridgeshire District Council
Host local authority	West Suffolk Council
Neighbouring local authority	Norfolk County Council
Neighbouring local authority	Essex County Council
Neighbouring local authority	Hertfordshire County Council
Neighbouring local authority	Northamptonshire County Council
Neighbouring local authority	Lincolnshire County Council
Neighbouring local authority	Peterborough City Council
Neighbouring local authority	Bedford Borough Council

Description	Consultee
Neighbouring local authority	Central Bedfordshire Council
Neighbouring local authority	South Cambridgeshire District Council
Neighbouring local authority	Huntingdonshire District Council
Neighbouring local authority	Fenland District Council
Neighbouring local authority	Borough Council of King's Lynn and West Norfolk
Neighbouring local authority	Breckland Council
Neighbouring local authority	Mid Suffolk District Council
Neighbouring local authority	Babergh District Council
Neighbouring local authority	Braintree District Council
The relevant Parish Council	Burwell Parish Council
The relevant Parish Council	Exning Parish Council

Description	Consultee
The relevant Parish Council	Fordham Parish Council
The relevant Parish Council	Snailwell Parish Council
The relevant Parish Council	Chippenham Parish Council
The relevant Parish Council	Freckenham Parish Council
The relevant Parish Council	Worlington Parish Council
The relevant Parish Council	West Row Parish Council
The relevant Parish Council	Isleham Parish Council
The relevant Parish Council	Newmarket Town Council
The relevant Parish Council	Mildenhall Parish Council
The Health and Safety Executive	The Health and Safety Executive

Description	Consultee
The relevant clinical commissioning group (CCG)	NHS West Suffolk CCG
The relevant clinical commissioning group (CCG)	NHS Cambridgeshire And Peterborough CCG
Natural England	Natural England
The Historic Buildings and Monuments Commission for England	Historic England
The relevant fire and rescue authority	Suffolk Fire and Rescue Service
The relevant fire and rescue authority	Cambridgeshire Fire and Rescue Service
The relevant police authority	Police and Crime Commissioner for Cambridgeshire and Peterborough
The relevant police authority	Suffolk Police and Crime Commissioner

Description	Consultee
The Environment Agency	The Environment Agency
Homes England	Homes England
The Civil Aviation Authority	The Civil Aviation Authority
The Highways Agency	Highways England
Secretary of State for Transport	Rt Hon Grant Shapps MP
Secretary of State for Defense	Rt Hon Ben Wallace MP
Office of Rail and Road	Office of Rail and Road
The Gas and Electricity Markets Authority	OFGEM
Canals and Rivers Trust	Canals and Rivers Trust
Public Health England, an executive agency of	Public Health England

Description	Consultee
the Department of Health	
The relevant local resilience forum	Cambridgeshire and Peterborough Local Resilience Forum
The relevant local resilience forum	Suffolk Local Resilience Forum
Relevant statutory undertakers	Ely Group of Internal Drainage Boards
Relevant statutory undertakers	Network Rail
Relevant statutory undertakers	Greater Anglia
Relevant statutory undertakers	Anglian Water Services
Relevant statutory undertakers	National Grid
Relevant statutory undertakers	UK Power Networks
Relevant statutory undertakers	NATS EnRoute Safeguarding
Non-prescribed consultee - political	Alok Sharma MP Department of Business, Energy and Industrial Strategy

Description	Consultee
Non-prescribed consultee - political	Mayor James Palmer Cambridgeshire and Peterborough Combined Authority
Non-prescribed consultee - political	Lucy Frazer MP
Non-prescribed consultee - political	Matt Hancock MP
Non-prescribed consultee - political	Richard Tice MEP East of England MEP
Non-prescribed consultee - political	Michael Hever MEP East of England MEP
Non-prescribed consultee - political	June Mummery MEP East of England MEP
Non-prescribed consultee - political	Barbara Gibson MEP East of England MEP
Non-prescribed consultee - political	Lucy Nethsingha MEP East of England MEP
Non-prescribed consultee - political	Catherine Rowett MEP East of England MEP

Description	Consultee
Non-prescribed consultee - political	Geoffrey Van Orden MEP East of England MEP
Non-prescribed consultee – horse racing	Jockey Club
Non-prescribed consultee – horse racing	Newmarket Horsemen’s Group
Non-prescribed consultee – horse racing	Godolphin and Darley
Non-prescribed consultee – horse racing	Tattersalls
Non-prescribed consultee – horse racing	Newmarket Trainers Federation
Non-prescribed consultee – horse racing	Newmarket Stud Farmers Association
Non-prescribed consultee – horse racing	National Heritage Centre for Horseracing and Sporting Art

Description	Consultee
Non-prescribed consultee	National Trust
Non-prescribed consultee	British Horse Society
Non-prescribed consultee	Suffolk Preservation Society
Non-prescribed consultee	Save Historic Newmarket
Non-prescribed consultee	Bedfordshire, Cambridgeshire and Northamptonshire Wildlife Trust
Non-prescribed consultee	Suffolk Wildlife Trust
Non-prescribed consultee	National Farmers Union
Non-prescribed consultee	Country Landowners Association
Non-prescribed consultee	Newmarket Ramblers
Non-prescribed consultee	Gardens Trust
Non-prescribed consultee	Suffolk Green Party

Description	Consultee
Non-prescribed consultee	Cambridgeshire Green Party
Non-prescribed consultee	CPRE East of England
Non-prescribed consultee	RSPB
Non-prescribed consultee	British Trust for Ornithology
Non-prescribed consultee	Suffolk Naturalists Society
Non-prescribed consultee	Suffolk Birds Group
Non-prescribed consultee-economic development	New Anglia LEP
Non-prescribed consultee-economic development	Cambridgeshire and Peterborough Business Board
Non-prescribed consultee-	Newmarket and District Chamber of Commerce

Description	Consultee
economic development	
Non-prescribed consultee- economic development	Ely Chamber of Commerce
Non-prescribed consultee- economic development	CBI East of England
Non-prescribed consultee – community	Mildenhall Cycling Club
Non-prescribed consultee- industry	Solar Trade Association
Non-prescribed consultee- industry	Renewable Energy Association
Non-prescribed consultee- seldom heard	Gypsy and Traveller liaison officers at Cambridgeshire County Council and Suffolk County Council
Non-prescribed consultee- seldom heard	Suffolk Coalition of Disabled People

Description	Consultee
Non-prescribed consultee- seldom heard	West Suffolk Disability Resource Centre
Non-prescribed consultee- seldom heard	Disability Forum for Suffolk
Non-prescribed consultee- seldom heard	Disability Cambridgeshire
Non-prescribed consultee- seldom heard	Suffolk and Cambridgeshire Young Farmers
Non-prescribed consultee	RAF Mildenhall
Non-prescribed consultee	RAF Lakenheath

Appendix A-3: Consultation materials published for the non-statutory consultation

- A.1.1.1 Stakeholder letter introducing the non-statutory consultation
- A.1.1.2 Land interest letter introducing the non-statutory consultation
- A.1.1.3 Press release advertising non-statutory consultation
- A.1.1.4 Non-statutory consultation booklet
- A.1.1.5 Exhibition boards
- A.1.1.6 Non-statutory consultation questionnaire

A.1.1.1 Stakeholder letter introducing the non-statutory consultation

NAME
ADDRESS 1
ADDRESS 2
ADDRESS 3
ADDRESS 4

5 June 2019

Dear XXXXXXX,

Sunnica Energy Farm

We will shortly begin consulting on our proposals for Sunnica Energy Farm. We wanted to provide you with advanced notice of the consultation, and to invite you to a preview of our plans.

Background

Sunnica is a proposal for a new energy farm connecting to the National Grid at Burwell. Located across sites close to Worlington, Chippenham and Snailwell, it would have the potential to deliver up to up to 500MW of renewable energy – enough to power approximately 100,000 homes. Due to its generating capacity, the scheme is classified as a Nationally Significant Infrastructure Project (NSIP).

The scheme is being brought forward by a team of industry experts. Sunnica Ltd is a joint venture between Tribus Energy and PS Renewables. Together we represent a very experienced team with a strong track record of investing in, and delivering high quality solar and energy storage developments.

The consultation

We will consult between **17 June 2019 and 28 July 2019**. This is the first stage of our public consultation programme. It will be a non-statutory consultation, which we are carrying out in advance of the statutory consultation that we are required to conduct on the project as an NSIP.

We're consulting at this early stage in scheme development because we want to gain valuable feedback which will help us prepare the design of our scheme – effectively, what we need to consider as we prepare our plans.

Find out more

We are holding a series of public exhibitions to help local people find out more about our proposals. As a representative of the local community, we would like to invite you to a preview of these events from **1600 to 2000 on 17 June 2019 at Riverside House Hotel, 17 Mill St, Mildenhall, Bury Saint Edmunds IP28 7DP**. We'd be very grateful if you could let us know whether you will be attending the preview by contacting us on 0808 168 7925 or info@sunnica.co.uk.

If you are unable to attend the preview event, we would be very happy to see you at one of our public exhibitions. These will take place at the following dates, times and locations:

Date	Location	Event time
21 June 2019	Worlington Village Hall, The Street, Worlington, Suffolk, IP28 8RU	1530 – 1930
22 June 2019	Red Lodge Millenium Centre, Lavender Cl, Bury St. Edmunds, Red Lodge, Bury Saint Edmunds IP28 8TT	1200 - 1600
28 June 2019	Chippenham Village Hall, Scotland End, Chippenham, Ely CB7 5PR	1530 – 1930
29 June 2019	Freckenham Village Hall, 7 Fordham Rd, Freckenham, Bury Saint Edmunds IP28 8JB	1400 – 1800
2 July 2019	Mandeville Hall, Burwell, Cambridge CB25 0AR	1530 - 1930
11 July 2019	West Row Village Hall, Chapel Road, West Row, Bury Saint Edmunds IP28 8NY	1530 – 1930
17 July 2019	Fordham Victoria Hall, Carter St, Fordham, Ely CB7 5NJ	1530 - 1930
19 July 2019	The Beeches, 32 Mill St, Isleham, Ely CB7 5RY	1530 - 1930

At the exhibitions, you will be able to view information about the proposals and speak to members of the project team.

We will also make copies of a booklet with information about the scheme and questionnaires available on our website, www.sunnica.co.uk, and at the following locations during the consultation:

Location
Burwell Library, Village College, Burwell, CB25 0DU
Mildenhall Library, Chestnut Close, Mildenhall, IP29 7NL
Newmarket Library, 1a the Guineas, Newmarket, CB8 8EQ

Responding to the consultation

Once the consultation opens on **17 June 2019**, you will be able to respond by:

- completing a consultation questionnaire online at www.sunnica.co.uk
- completing a paper copy of the consultation questionnaire and returning it to FREEPOST reference RTRB-LUJJ-AGBY, C/O Newgate Communications, 50 Basinghall Street, London, EC2V 5DE
- in writing to info@sunnica.co.uk or FREEPOST reference RTRB-LUJJ-AGBY, C/O Newgate Communications, 50 Basinghall Street, London, EC2V 5DE

Paper copies of the questionnaire will be available at any of the events or deposit points set out in this letter, or on request.

We'd be very grateful if you could share your response by the closing date of the consultation on **28 July 2019**.

We hope to see you at one of our consultation events. If you have any questions in the meantime, please contact us directly on 0808 168 7925 or info@sunnica.co.uk.

Yours sincerely,



Luke Murray
Sunnica Ltd

A.1.1.2 Land interest letter introducing the non-statutory consultation

NAME
ADDRESS 1
ADDRESS 2
ADDRESS 3
ADDRESS 4

3 June 2019

Dear XXXXXXXX,

Sunnica Energy Farm

We will shortly begin consulting on our proposals for Sunnica Energy Farm. We're writing to you because we have identified you as having a potential interest in land in the vicinity of the scheme. We wanted to provide you with advanced notice of the consultation, and to invite you to a preview of our plans.

Background

Sunnica is a proposal for a new energy farm connecting to the National Grid at Burwell. Located across sites close to Worlington, Chippenham and Snailwell, it would have the potential to deliver up to up to 500MW of renewable energy – enough to power approximately 100,000 homes. Due to its generating capacity, the scheme is classified as a Nationally Significant Infrastructure Project (NSIP).

The scheme is being brought forward by a team of industry experts. Sunnica Ltd is a joint venture between Tribus Energy and PS Renewables. Together we represent a very experienced team with a strong track record of investing in, and delivering high quality solar and energy storage developments.

The consultation

We will consult between **17 June 2019 and 28 July 2019**. This is the first stage of our public consultation programme. It will be a non-statutory consultation, which we are carrying out in advance of the statutory consultation that we are required to conduct on the project as an NSIP.

We're consulting at this early stage in scheme development because we want to gain valuable feedback which will help us prepare the design of our scheme – effectively, what we need to consider as we prepare our plans.

Find out more

We are holding a series of public exhibitions to help local people find out more about our proposals. We would like to invite you to a preview of these events from **1600 to 2000** on **20 June 2019** at **Riverside House Hotel, 17 Mill St, Mildenhall, Bury Saint Edmunds**

IP28 7DP. We'd be very grateful if you could let us know whether you will be attending the preview by contacting us on 0808 168 7925 or info@sunnica.co.uk.

If you are unable to attend the preview event, we would be very happy to see you at one of our public exhibitions. These will take place at the following dates, times and locations:

Date	Location	Event time
21 June 2019	Worlington Village Hall, The Street, Worlington, Suffolk, IP28 8RU	1530 – 1930
22 June 2019	Red Lodge Millenium Centre, Lavender Cl, Bury St. Edmunds, Red Lodge, Bury Saint Edmunds IP28 8TT	1200 - 1600
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2 July 2019	Mandeville Hall, Burwell, Cambridge CB25 0AR	1530 - 1930
11 July 2019	West Row Village Hall, Chapel Road, West Row, Bury Saint Edmunds IP28 8NY	1530 – 1930
17 July 2019	Fordham Victoria Hall, 12-52 Carter St, Fordham, Ely CB7 5NJ	1530 - 1930
19 July 2019	The Beeches, 32 Mill St, Isleham, Ely CB7 5RY	1530 - 1930

At the exhibitions, you will be able to view information about the proposals and speak to members of the project team.

We will also make copies of a booklet with information about the scheme and questionnaires available on our website, www.sunnica.co.uk, and at the following locations during the consultation:

Location
Burwell Library, Village College, Burwell, CB25 0DU
Mildenhall Library, Chestnut Close, Mildenhall, IP29 7NL
Newmarket Library, 1a the Guineas, Newmarket, CB8 8EQ

Responding to the consultation

Once the consultation opens on **17 June 2019**, you will be able to respond by:

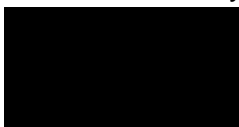
- completing a consultation questionnaire online at www.sunnica.co.uk
- completing a paper copy of the consultation questionnaire and returning it to FREEPOST reference RTRB-LUJJ-AGBY, C/O Newgate Communications, 50 Basinghall Street, London, EC2V 5DE
- in writing to info@sunnica.co.uk or FREEPOST reference RTRB-LUJJ-AGBY, C/O Newgate Communications, 50 Basinghall Street, London, EC2V 5DE

Paper copies of the questionnaire will be available at any of the events or deposit points set out in this letter, or on request.

We'd be very grateful if you could share your response by the closing date of the consultation on **28 July 2019**.

We hope to see you at one of our consultation events. If you have any questions in the meantime, please contact us directly on 0808 168 7925 or info@sunnica.co.uk.

Yours sincerely,



Luke Murray
Sunnica Ltd

A.1.1.3 Press release advertising non-statutory consultation



News Release

11 June 2019

Sunnica launches public consultation on energy farm proposals

Proposals for a new energy farm, Sunnica, connecting to the National Grid at Burwell will be on display at a series of public exhibitions in the local area between 11 June 2019 and 23 July 2019.

Sunnica Energy Farm, a joint venture between Tribus Clean Energy and PS Renewables, would comprise two new solar farms located on separate sites near to Chippenham in Cambridgeshire and near to Worlington and Freckenham in Suffolk. These would be connected to each other and the National Grid using underground cables.

If built, it would allow for the generation, storage, import and export of up to 500 megawatts (MW) of electrical capacity and have potential to meet the energy needs of around 100,000 homes. Due to its generating capacity, it is classified as a Nationally Significant Infrastructure Project (NSIP).

The exhibitions are taking place as part of a public consultation being carried out by Sunnica Ltd. They will give local people a chance to view the plans and provide feedback to the project team.

Luke Murray of Sunnica Ltd said:

“This is the first stage of our public consultation programme. We’re consulting at an early stage in scheme development because we want to gain valuable feedback which will help us prepare the design of our plans. We encourage as many people as possible to attend one of our upcoming public exhibitions to learn more about the scheme and share their views.”

The exhibitions will take place at the following dates and locations:

- Friday 21st June – Worlington Village Hall (3:30pm-7:30pm)
- Saturday 22nd June – Red Lodge Millennium Centre (12:00pm – 4:00pm)
- Friday 28th June – Chippenham Village Hall (3:30pm – 7:30pm)
- Saturday 29th June – Freckenham Village Hall (2:00pm – 6:00pm)
- Tuesday 2nd July – Mandeville Hall, Burwell (3:30pm – 7:30pm)
- Thursday 11th July – West Row Village Hall (3:30pm – 7:30pm)
- Wednesday 17th July – Fordham Victoria Hall (3:30pm – 7:30pm)
- Friday 19th July – The Beeches, Isleham (3:30pm – 7:30pm)

Further information is available on the project website: www.sunnica.co.uk.

Ends

**For further information, please contact
Douglas Johnson**

██████████@newgatecomms.com

██████████
██████████

Paul Kelly

██████████@newgatecomms.com

██████████
██████████

Notes to Editors:

Sunnica Ltd

Sunnica Energy Farm is being brought forward by Sunnica Ltd. This is a joint venture between two solar energy specialists, Tribus Clean Energy and PS Renewables.

Both companies are highly experienced in the development of solar energy and energy storage projects in the UK and abroad.

Together, the partners in Sunnica Ltd already contribute 1GW of clean energy to the UK with more on the way.

Sunnica Energy Farm

Sunnica Energy Farm is a proposed new energy farm connecting to the Burwell National Grid Substation in Cambridgeshire.

It would comprise two new solar farms located on separate sites – one near to Chippenham, known as Sunnica East, and one near to Worlington and Freckenham, known as Sunnica West. These will be connected to each other and the National Grid using underground cables.

Each solar farm will use ground-mounted photovoltaic (PV) panels to generate electricity from the sun. The scheme will also include a Battery Energy Storage System (BESS), which will allow it to store, import and export electricity to and from the National Grid.

Sunnica Energy Farm will allow for the generation, storage, import and export of up to 500 megawatts (MW) of electrical capacity. This has the potential to meet the energy needs of around 100,000 homes.

Nationally Significant Infrastructure Projects

The scheme is classified a Nationally Significant Infrastructure Project (NSIP) because of its generating capacity. NSIPs are major developments which require planning permission to be granted by the relevant Secretary of State through a Development Consent Order (DCO). This is a process established by the Planning Act 2008.

Unlike local planning permissions, which are considered by local authorities, DCO applications are made to the Planning Inspectorate. This administers the application process on behalf of the Secretary of State. In this case, the relevant Government Department is the Department for Business, Energy and Industrial Strategy (BEIS).

DCOs are governed by a fixed, statutory process which requires applicants to consult with the local community and to carry out environmental assessments. This current consultation is non-statutory consultation which Sunnica Ltd is carrying out in advance of a future statutory consultation.

Further information about the DCO process is available at the Planning Inspectorate's website:
<https://infrastructure.planninginspectorate.gov.uk/>

A.1.1.4 Non-statutory consultation booklet

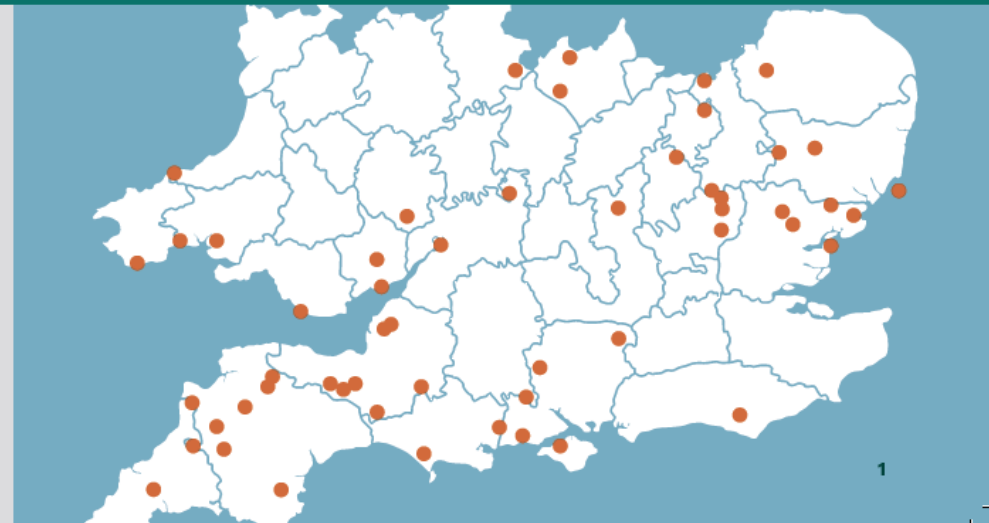


Who is behind Sunnica Energy Farm

Sunnica Energy Farm is being brought forward by Sunnica Ltd. This is a joint venture between two solar energy specialists, Tribus Energy and PS Renewables.

Both companies are highly experienced in the development of solar energy and energy storage projects in the UK and abroad.

Together, the partners in Sunnica Ltd already contribute nearly 1GW of clean energy to the UK with more on the way.



Why is Sunnica Energy Farm needed?

Carbon reduction

UK to stop using coal by 2025.

The UK is going through a major change in the way that it meets its energy needs. We're moving away from centralised carbon-intensive electricity generation, such as coal and gas fired power stations, to a more decentralised system of cleaner, sustainable energy generation such as solar power.

There are several reasons for this change. Older methods of electricity generation are reaching the end of their life. The Government has set out plans for all power stations in the UK to stop using coal by 2025.

Changing energy demands

National Grid has predicted that there may be up to 36 million electric vehicles on the UK's roads by 2040.

The UK also needs to reduce how much it uses coal and gas fired power stations in order to meet its commitments to address climate change. The Government's independent adviser on climate change, the Climate Change Committee, recommends that the UK reduces its emissions to meet a target of net-zero greenhouse gas emissions by 2050. We cannot therefore simply open or operate more coal or gas fired power stations.

At the same time, the way we use electricity is changing. This can be seen through the use of new products such as electric powered vehicles. National Grid has predicted that there may be up to 36 million electric vehicles on the UK's roads by 2040. Managing

Net-zero emissions by 2050

UK must reduce its emissions to meet a target of net-zero greenhouse gas emissions by 2050.

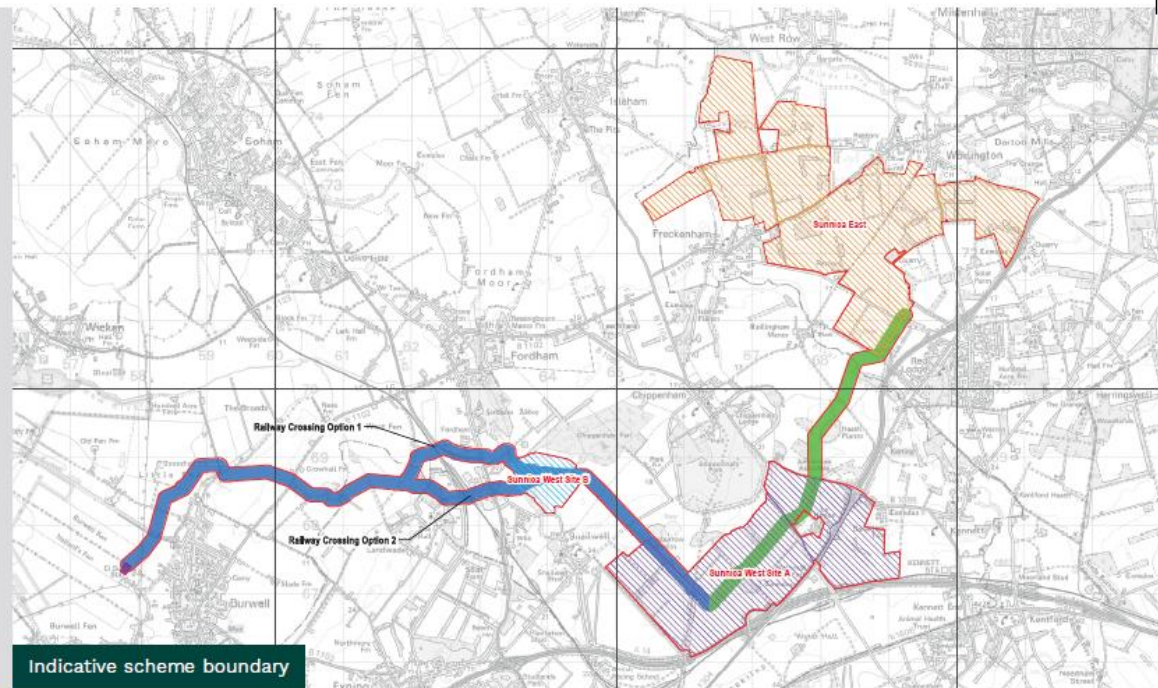
the UK's electricity demands will therefore become increasingly complex.

If we do not replace older methods of generation appropriately, the country will increasingly struggle to meet its energy needs. National Grid's 'Two Degrees' scenario shows a 107 GW gap between the 53 GWs of low-carbon generation capacity today and that which is projected to be needed in 2050.

Meeting this challenge requires a revolution in the way we meet our energy needs. We need to adapt our infrastructure in order to offer clean, low carbon sources of energy generation that are fit for the future. We are bringing forward a project that will make a significant contribution to this process.



What is proposed?



Sunnica Energy Farm is a proposed new energy farm connecting to the Burwell National Grid Substation in Cambridgeshire.

It would be located across three separate sites – Sunnica East, located close to Worlington and Freckenham, Sunnica West A, located close to Chippenham, and Sunnica West B, located close to Snailwell.

These will be connected to each other and the National Grid substation using underground cables. This will require an extension to the substation. The area that we have identified for the extension is a field immediately to the west of the existing substation.

At each of the solar farm sites, we would use ground-mounted photovoltaic (PV) panels to generate electricity from the sun. The scheme will also include two battery energy storage systems, which will allow it to store, import and export electricity to and from the UK electricity grid.

Sunnica Energy Farm will allow for the generation, storage, import and export of up to 500 megawatts (MW) of electrical capacity. This has the potential to meet the energy needs of around 100,000 homes.

We are at an early stage in scheme development. We will consider feedback from this consultation as we develop the scheme in more detail.

Location



Solar farms need to be in locations with enough consistent light levels to generate sufficient electricity to be economically viable. In practice, this means that the south and east of the country are better locations for projects of this type.

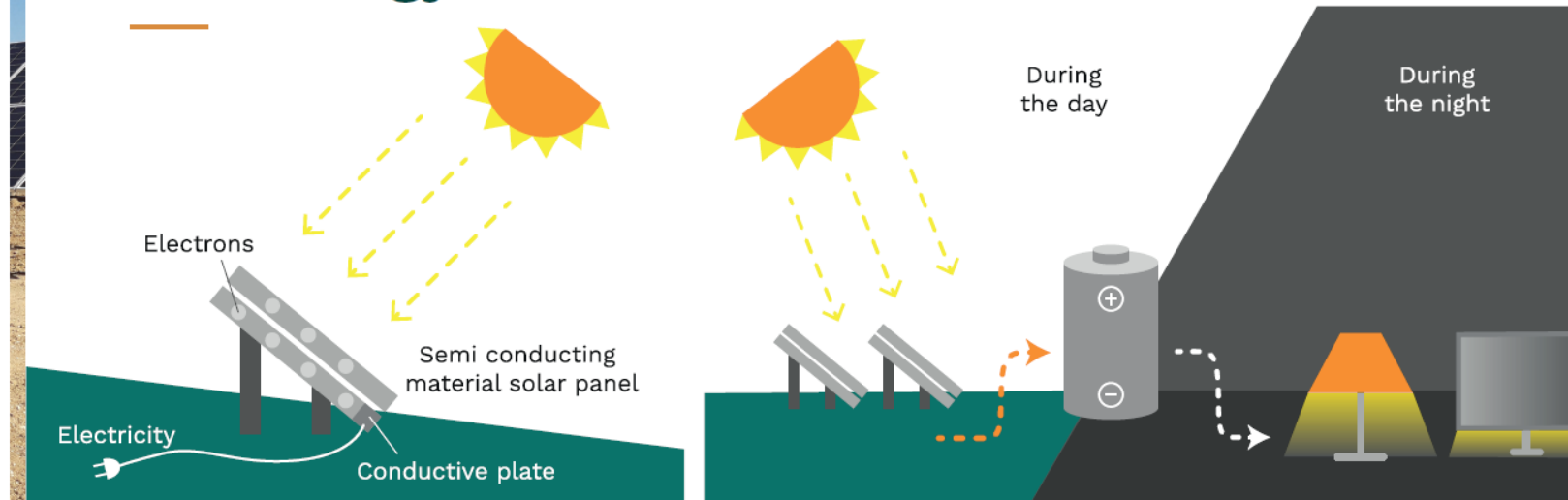
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We then need to find a location where there is sufficient transmission capacity in the National Grid for the scheme. We have secured a grid connection at the Burwell National Grid Substation in Cambridgeshire, which will be extended to accommodate the proposed grid connection.

Sites for solar farms need to be as close as possible to the point of grid connection. The land also needs to be available. We are predominantly aiming to use land which is not considered by the Government to be 'Best and Most Versatile'.

We are bringing forward our proposals at Sunnica East, Sunnica West A and Sunnica West B because these sites meet all of these criteria.

Technology



Solar photovoltaic energy generation

We are proposing to use a tried and tested technology – photovoltaic (PV) energy generation. This involves the conversion of light energy to electrical energy through the use of semiconducting materials. We will use solar panels up to 3.5 metres tall and mounted on the ground.

This allows us to produce totally clean energy, without emissions. Once installed and operational, the panels only require the use of sunlight. There is a direct relationship between the amount of land we use for solar PV and the level of energy we are able to produce.

We are yet to make many of the decisions relating to the design of the solar panels, their dimensions, and the angle of their slope.

We need to progress our environmental assessments of the project sites to inform these decisions. We'll also take into consideration the feedback from this consultation.

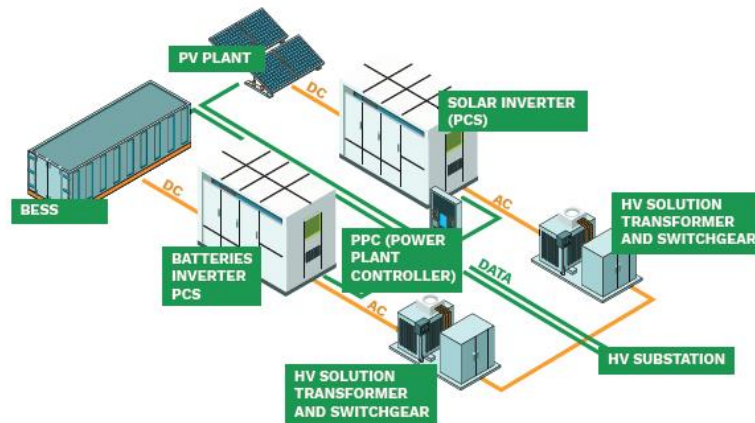
Technology

Battery energy storage systems

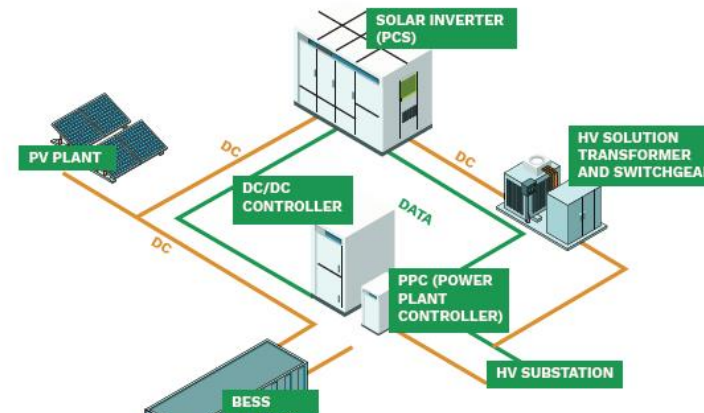
We are also proposing to include battery energy storage systems at Sunnica East and Sunnica West A and B. This technology will mean that electricity can be stored when more is being produced than is being used at a certain time, and released again when it is needed.

The battery energy storage systems will be in containers around 4-5 metres in height. We are currently considering the best locations for the battery energy storage systems at each site – they will either be distributed around the sites or in a central location at each.

Elements of existing battery energy storage systems



Distributed battery energy storage system



Centrally located battery energy storage system

Grid connection route

Sunnica East, Sunnica West A and Sunnica West B will be connected to the UK electricity grid using an underground cable.

The grid connection cable will run from Sunnica East to Sunnica West A, then Sunnica West B, and onwards to the Burwell National Grid Substation. This will cross existing infrastructure including the railway line between Ely and Bury St Edmunds.

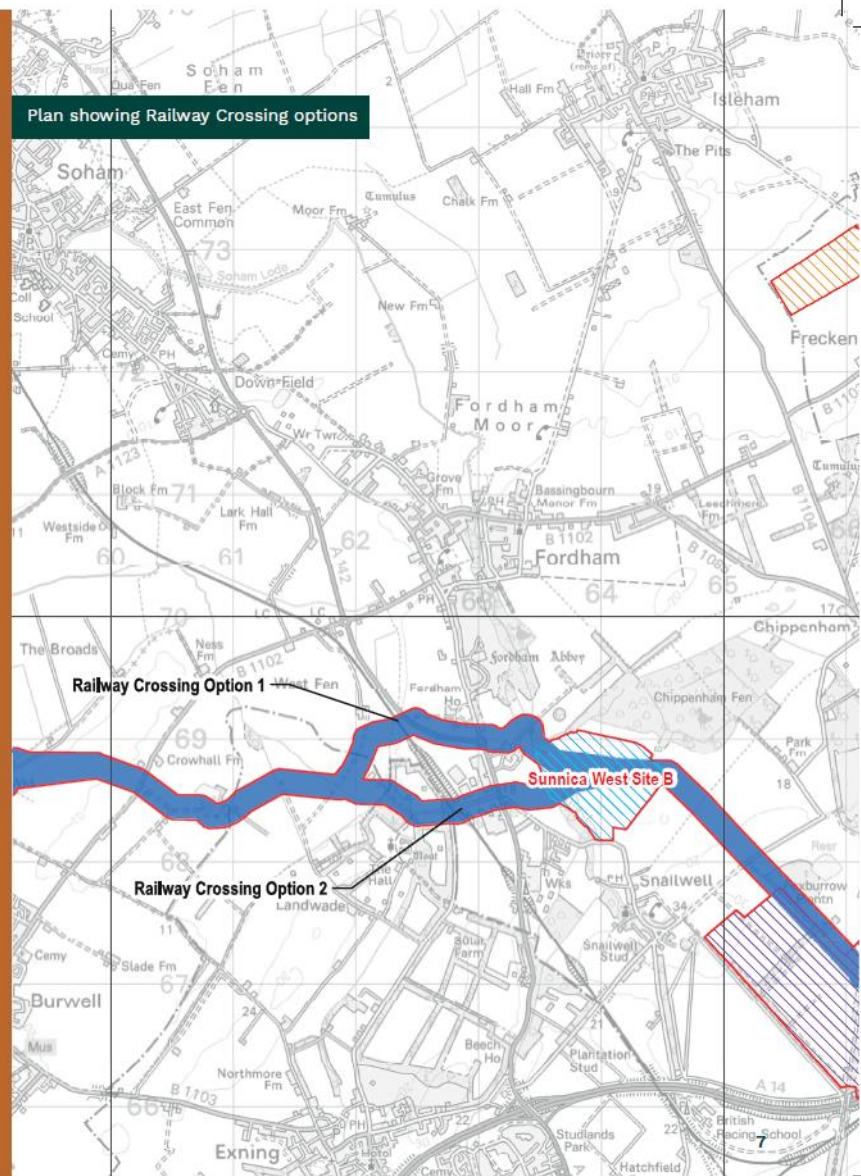
We're currently defining the precise route that the cable will follow, and are considering options within the corridor shown on the plan on this page. This includes two possible options for where we cross the railway line.

Our choice of route will also impact on the way we install the cable. Generally, we expect to use open cut trenching – but there are some places where we may need to use a technique known as directional drilling or boring.

This involves using a targeted drill to make a hole for the cable and pulling it through.

There are a wide range of constraints we need to consider in making these decisions, including physical, ecological, cultural heritage and human interactions, technical engineering, legal and commercial considerations.

That means that we need to refine our options for the route over time, taking into account the surveys and environmental impact assessments that we are currently carrying out. We will present more information about this at the next round of consultation.



Environmental Impact Assessment

Solar energy generation and battery storage are a sustainable and clean means of meeting our changing energy needs. However, as with any major infrastructure project, we recognise that the scheme has potential environmental impacts, which need to be managed.

We will conduct a programme of environmental assessment, which will help to shape the design of the scheme. These will include assessments of the scheme's potential impacts on cultural heritage, ecology, landscape and visual impact, flood risk and water resources, glint and glare, noise and vibration, socio-economics and land use, and transport and access. Where appropriate, we will propose mitigation.

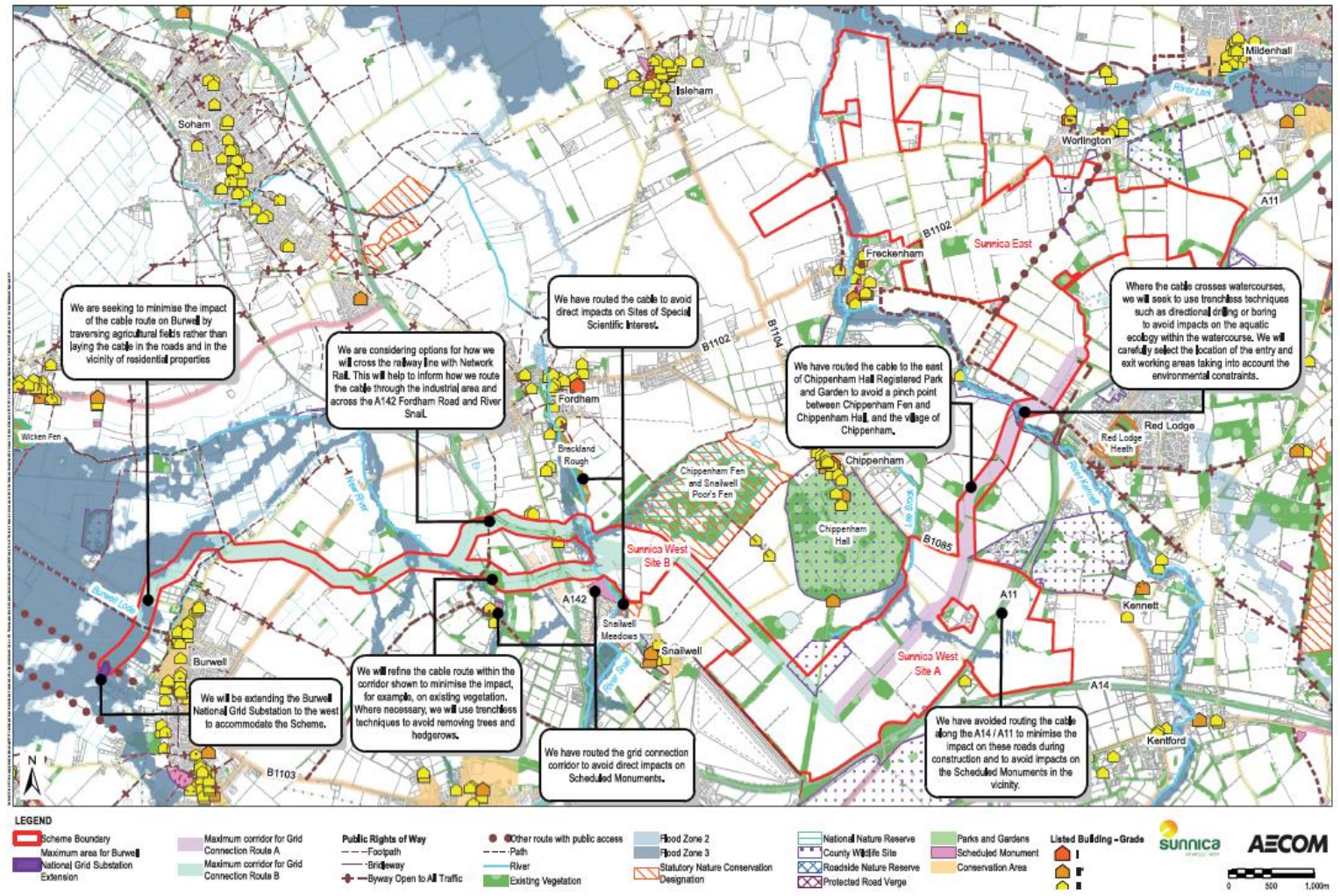
We need to carry these assessments out iteratively, over time. We are engaging with relevant authorities such as Natural England and the Environment Agency, as well as local people, to understand the correct scope and focus of our assessments.

That means that the information we are presenting as part of this consultation includes some details of the types of assessments we plan to carry out, but it is not a full Environmental Impact Assessment.

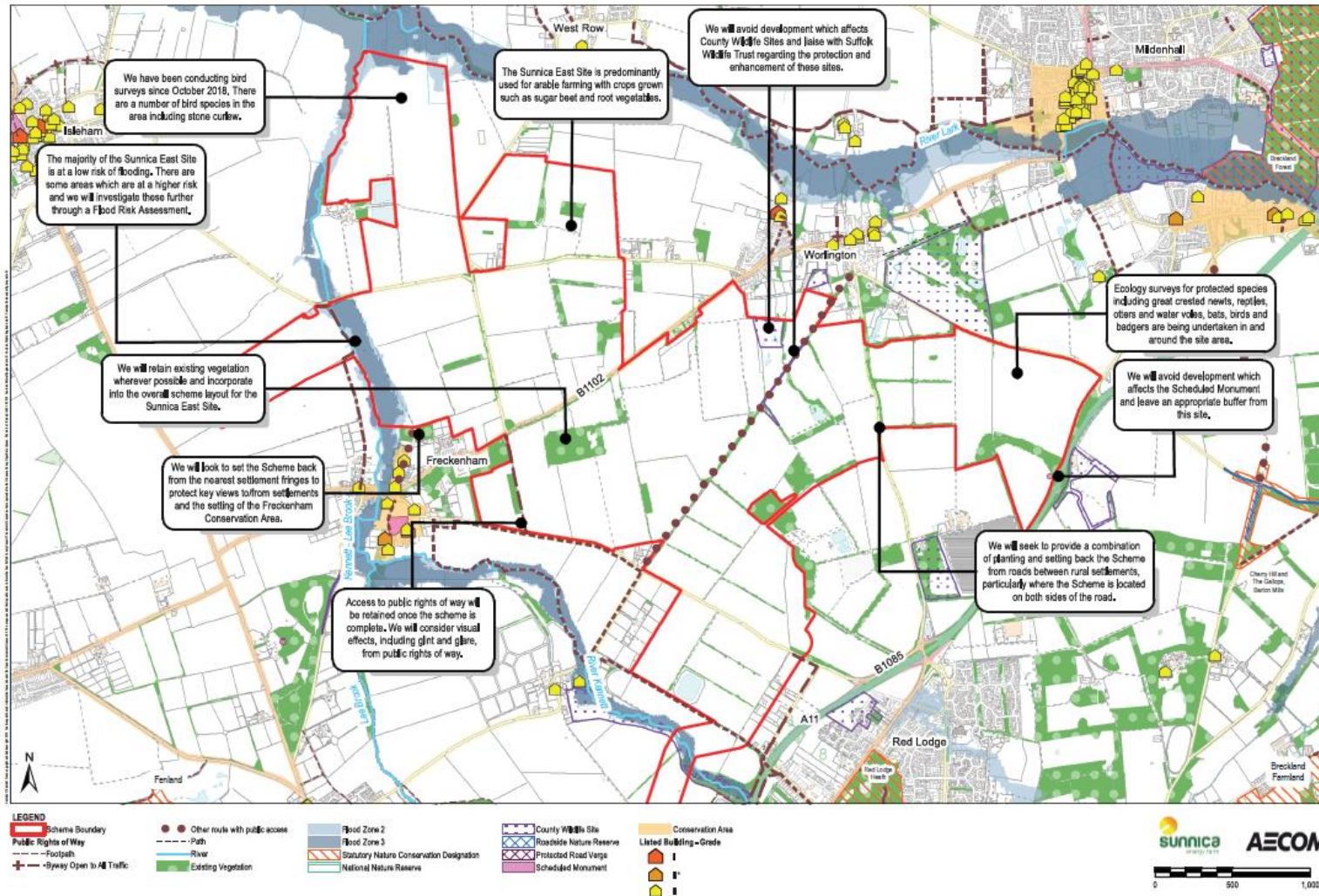
Following this consultation, we will consider feedback and conduct assessments to allow us to present more detailed information when we next consult.

We will prepare and submit an Environmental Statement as part of our application for development consent. This will set out the outcomes of our assessments, as well as details of any proposed mitigation. More information will be available during the statutory consultation where we will share the preliminary results of our Environmental Impact Assessment.

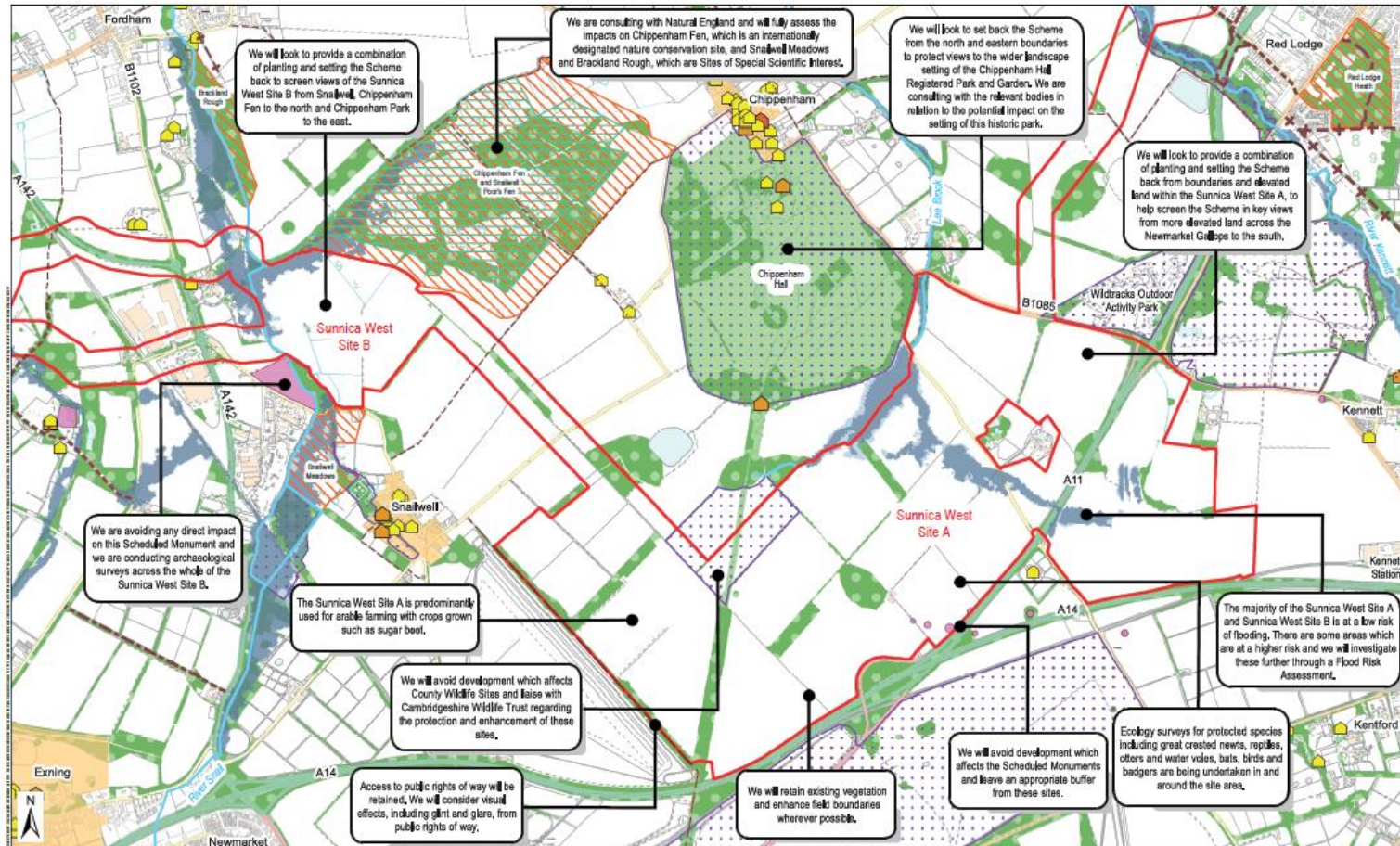
Environmental constraints plan



Environmental constraints - Sunnica East



Environmental constraints - Sunnica West A and Sunnica West B



LEGEND

Scheme Boundary	River	Statutory Nature Conservation Designation	Parks and Gardens	Listed Building - Grade I
Public Rights of Way	Existing Vegetation	National Nature Reserve	Scheduled Monument	Listed Building - Grade II
Footpath	Flood Zone 2	County Wildlife Site	Conservation Area	Listed Building - Grade II*
Brideway	Flood Zone 3	Protected Road Varge		
Byway Open to All Traffic				



Landscape and views

We know that understanding where and how Sunnica Energy Farm will be visible will be particularly important to members of the local community, and we are working to ensure that the scheme is as integrated as possible into the local landscape.

We will carry out an assessment of the effects of the scheme on the landscape and from a number of key views. We are currently in consultation with the host local authorities' landscape specialists to agree the viewpoints, which we will present and assess in our Landscape and Visual Impact Assessment (LVIA).

This will help inform our design – it will be important in determining where we locate solar panels or battery energy storage systems, for example. Where appropriate, we will also propose mitigation. This could include setting back development from the edge of the sites or planting to screen or filter views in affected locations.

Ecology

We are aware that there are a number of sites designated for their ecological significance near the scheme. These include Chippenham Fen, which is a Special Area of Conservation and Ramsar site, the Breckland Special Protection Area, as well as other SSSIs and County Wildlife Sites in close proximity.

We are carrying out habitat and species surveys over a period of time to allow us to identify the potential impacts of the scheme. These surveys include wintering and breeding birds, bats, reptiles and amphibians, invertebrates, water vole and otter. Where appropriate, we will propose mitigation informed by the results of these surveys, as well as discussions with Natural England and other relevant bodies. We will develop a comprehensive site-wide biodiversity and landscape management plan for each of the sites - in consultation with stakeholders - to secure opportunities to protect and enhance biodiversity. Our aim will be to create a net improvement in biodiversity.



Cultural heritage

We have already carried out initial assessments to identify the known archaeological and cultural heritage assets within and around the scheme boundary and the potential for unknown archaeology.

There are Scheduled Monuments on both the Sunnica East and Sunnica West A sites, as well as a history of archaeological finds in the local area. Sunnica West A is also close to the Grade II listed Chippenham Hall Registered Park and Garden. There are also a number of other listed buildings in the area whose setting will need to be considered.

We will avoid development which directly affects Scheduled Monuments and we are currently conducting archaeological surveys of all three sites, in consultation with Historic England and the Cambridgeshire and Suffolk County Archaeologists. This will provide the information we need to assess the impacts and identify an appropriate mitigation strategy.

Our cultural heritage team is working closely with our landscape team to identify appropriate mitigation to reduce the effects on the setting of the Chippenham Hall Registered Park and Garden, and other historic buildings and monuments.

Traffic and access

Once operational, Sunnica Energy Farm will lead to very few additional vehicles on local roads. However, building the scheme will create traffic – and we're aware how important it is that this is properly managed.

We are evaluating how many vehicle movements will be needed to build the scheme. This depends in part on the final design of the scheme – for example, the layout of the site and the number of panels we'll be using. We're currently therefore considering our options for accessing the site and discussing these with Highways England and the local highways authorities. We will present more information on this at the next round of consultation. We will produce a comprehensive Construction Traffic Management Plan which sets out how we aim to control traffic movements throughout the construction period.

The planning process

The scheme is classified a Nationally Significant Infrastructure Project (NSIP) because its proposed generating capacity is higher than 50MW.

NSIPs are major developments which require planning permission to be granted by the relevant Secretary of State through a Development Consent Order (DCO). This is a process established by the Planning Act 2008.

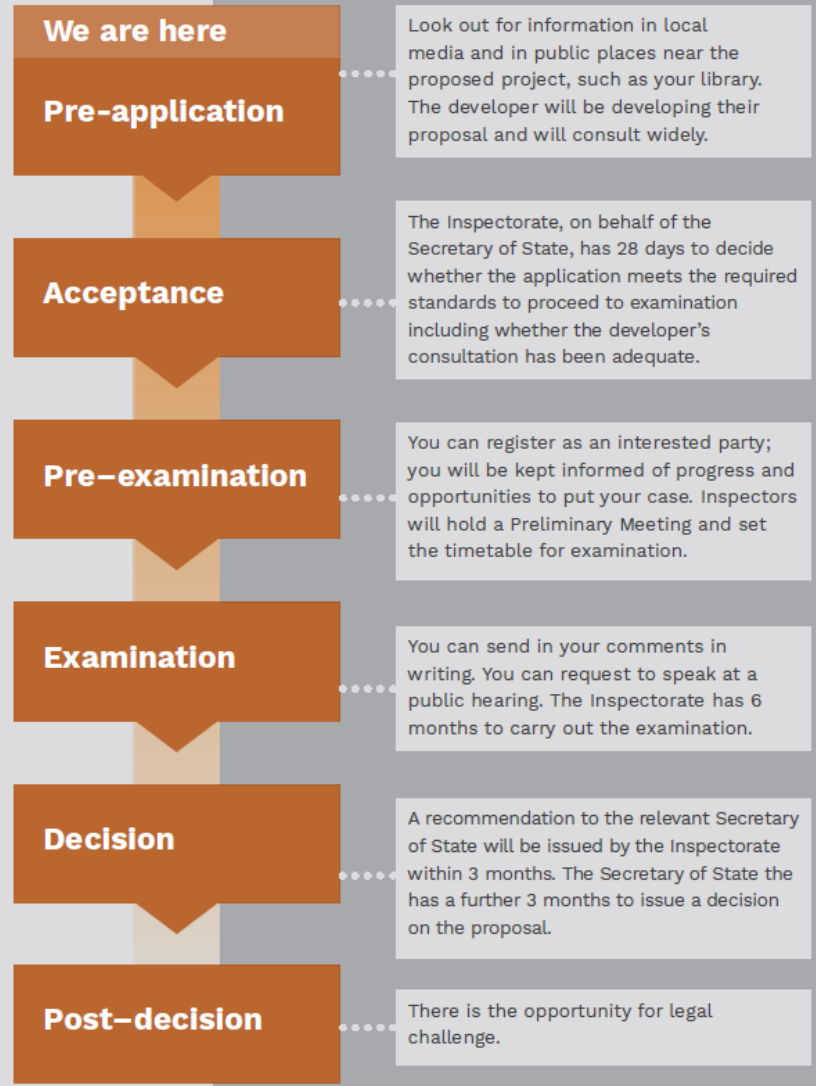
Unlike local planning permissions, which are considered by local authorities, DCO applications are made to the Planning Inspectorate. This administers the application process on behalf of the Secretary of State. In this case, the relevant Government Department is the Department for Business, Energy and Industrial Strategy (BEIS).

DCOs are governed by a fixed, statutory process which requires us to consult with the local

community and to carry out environmental assessments. It also provides a fixed role for local authorities and means we will be following a fixed, clear process to develop the scheme.

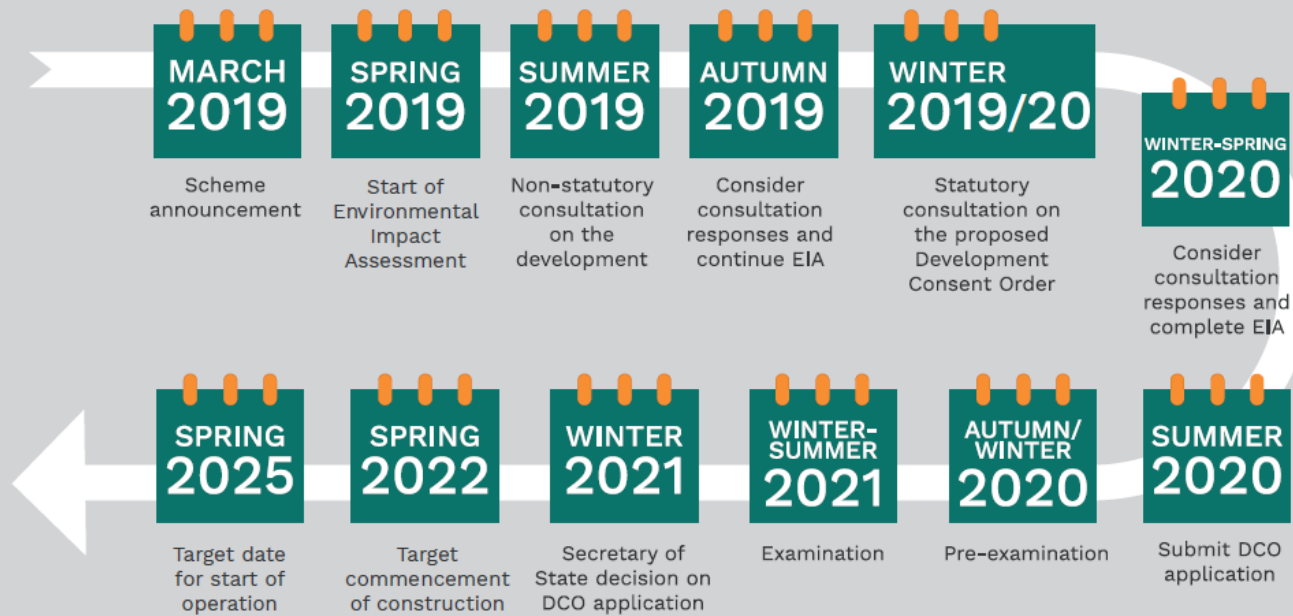
This current consultation is non-statutory consultation. We are carrying this out before our statutory consultation because we want to gain valuable feedback that will allow us to develop a better scheme and to ensure that later consultation is appropriate and effective.

You can find out more about the DCO process at the Planning Inspectorate's website: <https://infrastructure.planninginspectorate.gov.uk/>



Timeline

This is our first round of consultation on our proposals for Sunnica Energy Farm. We will conduct a round of statutory consultation in the winter, before submitting our DCO application in summer 2020.



How to respond to this consultation

We are consulting between **17 June 2019** and **28 July 2019**. We would like to know what you think about our scheme proposals.

Share your views by:

- a. Completing a consultation questionnaire online at www.sunnica.co.uk
- b. Picking up a consultation questionnaire at one of the exhibitions or deposit points set out on page 17 and returning it to

FREEPOST reference
RTRB-LUUJ-AGBY,
C/O Newgate
Communications,
50 Basinghall Street,
London, EC2V 5DE

"We'd be very grateful if you could share your response by the closing date of the consultation on 28 July 2019."

Following this consultation

We will consider all views we receive, continue our technical assessments, and prepare our scheme design. We will present more information on this at the statutory consultation later in the year.

Your comments will be analysed by Sunnica Ltd and any of its appointed agents. Copies may be made available in due course to the Secretary of State, the Planning Inspectorate and other relevant statutory authorities so that your comments can be considered as part of the Development Consent Order (DCO) application process. We will request that your personal details are not placed on public record and will be held securely by Sunnica Ltd in accordance with the data protection law and will be used solely in connection with the consultation process and subsequent DCO application and, except as noted above, will not be passed to third parties.

Consultation questions

The consultation questions are:

1. What do you think we need to consider in terms of:
 - a) The design of Sunnica East?
 - b) The design of Sunnica West?
 - c) The design of our cable routes?
 - d) Environmental impacts?
2. We are currently proposing that the cables associated with Sunnica Energy Farm should be underground. Do you have any comments on this and the route we are currently proposing?
3. We are considering whether the battery storage element of the scheme should be spread around Sunnica East and Sunnica West or concentrated at particular locations. Do you have any comments on this?
4. Do you any information relevant to the scheme and/or local environment which you think we should take into account?
5. Are there any specific enhancements locally you feel could be included as part of the scheme?
6. Is there anything you would like to know more about at the next round of events?
7. Do you have any further comments?

Find out more



We are holding a series of public exhibitions as part of the consultation to help people find out more about our proposals:

Venues

Friday 21st June
Worlington Village Hall
3:30pm – 7:30pm

Saturday 22nd June
Red Lodge
Millennium Centre
12:00pm – 4:00pm

Friday 28th June
Chippenham, Village Hall
3:30pm – 7:30pm

Saturday 29th June
Freckenham
Village Hall
2:00pm – 6:00pm

Tuesday 2nd July
Mandeville Hall, Burwell
3:30pm – 7:30pm

Thursday 11th July
West Row Village Hall
3:30pm – 7:30pm

Wednesday 17th July
Fordham Victoria Hall
3:30pm – 7:30pm

Friday 18th July
The Beeches, Isleham
3:30pm – 7:30pm

At the exhibitions, you will be able to view information about the proposals and speak to members of the project team.

Booklets and questionnaires

We will also make copies of a booklet with information about the scheme and questionnaires available at the following locations during the consultation:

Burwell Library
Village College, Burwell, CB25 0DU

Mildenhall Library
Chestnut Close, Mildenhall, IP28 7NL

Newmarket Library
1a the Guineas, Newmarket, CB8 8EQ

You can also find out more by:

Going online: www.sunnica.co.uk
Email: info@sunnica.co.uk
Phone: 08081687925





Public consultation 17 June 2019 – 28 July 2019



Sunnica Ltd is consulting on its proposals for a new energy farm connecting to the National Grid at Burwell in Cambridgeshire.

Sunnica Energy Farm would be located across three separate sites - Sunnica East, located close to Worlington and Freckenham, Sunnica West A, located close to Chippenham, and Sunnica West B, located close to Snailwell. These will be connected to each other and the National Grid using underground cables.

If built, it would allow for the generation, storage, import and export of up to 500 megawatts (MW) of electrical capacity and have the potential to meet the energy needs of around 100,000 homes.

Find out more

We are holding a series of public exhibitions as part of the consultation to help people find out more about our proposals:

- | | |
|---|--|
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- Burwell Library**
Village College, Burwell, CB25 0DU
- Mildenhall Library**
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1a the Guineas, Newmarket, CB8 8EQ

You can find out more at our website, www.sunnica.co.uk, or by contacting us directly on info@sunnica.co.uk or 08081687925.



A.1.1.5 Exhibition boards

An exhibition board with a teal background. At the top left is the Sunnica Energy Farm logo. Below it, the word "Welcome" is written in a large, white, sans-serif font. Underneath "Welcome" is a thin horizontal line. The main text of the board is in white, sans-serif font, and is organized into two columns. The bottom portion of the board features a photograph of a solar farm with rows of blue solar panels in a grassy field under a blue sky with white clouds. The bottom of the board has a solid teal background.

sunnica
energy farm

Welcome

Thank you for taking an interest in Sunnica Energy Farm, our proposal for a new energy farm at sites in Suffolk and Cambridgeshire.

This is the first stage of our public consultation programme. The purpose of this exhibition is to inform the public about our proposals and gather initial thoughts and observations to help shape our plans moving forward. We'll also explain the planning process for the scheme.

Much of our planning is at an early stage. We want to get your views now as this will help to improve our proposals from the outset.

To help you understand our proposals, the project team is on hand at this exhibition to explain them in more detail and to listen to your views. Please feel free to approach them with any questions you might have.

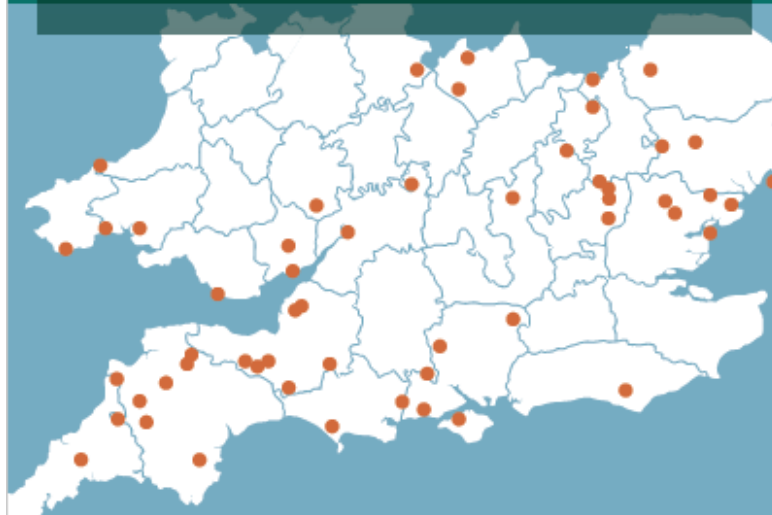


Who is behind Sunnica Energy Farm?

Sunnica Energy Farm is being brought forward by Sunnica Ltd. This is a joint venture between two solar energy specialists, Tribus Energy and PS Renewables.

Both companies are highly experienced in the development of solar energy and energy storage projects in the UK and abroad.

Together, the partners in Sunnica Ltd already contribute nearly 1GW of clean energy to the UK with more on the way.



Projects currently operated by the partners in Sunnica Ltd

Why is Sunnica Energy Farm needed?

The UK is going through a major change in the way that it meets its energy needs. We're moving away from centralised carbon-intensive electricity generation, such as coal and gas fired power stations, to a more decentralised system of cleaner, sustainable energy generation such as solar power.

<p>There are several reasons for this change. Older methods of electricity generation are reaching the end of their life. The Government has set out plans for all power stations in the UK to stop using coal by 2025.</p>	<h2 style="margin: 0;">Carbon reduction</h2> <p style="margin: 0; background-color: #8B4513; color: white; padding: 2px;">UK to stop using coal by 2025.</p>
<h2 style="margin: 0;">Changing energy demands</h2> <p style="margin: 0; background-color: #8B4513; color: white; padding: 2px;">National Grid has predicted that there may be up to 36 million electric vehicles on the UK's roads by 2040.</p>	<p>The UK also needs to reduce how much it uses coal and gas fired power stations in order to meet its commitments to address climate change. The Government's independent adviser on climate change, the Climate Change Committee, recommends that the UK reduces its emissions to meet a target of net-zero greenhouse gas emissions by 2050. We cannot therefore simply open or operate more coal or gas fired power stations.</p> <p>At the same time, the way we use electricity is changing. This can be seen through the use of new products such as electric powered vehicles. National Grid has predicted that there may be up to 36 million electric vehicles on the UK's roads by 2040. Managing the UK's electricity demands will therefore become increasingly complex.</p>
<p>If we do not replace older methods of generation appropriately, the country will increasingly struggle to meet its energy needs. National Grid's 'Two Degrees' scenario shows a 107 GW gap between the 53 GWs of low-carbon generation capacity today and that which is projected to be needed in 2050.</p> <p>Meeting this challenge requires a revolution in the way we meet our energy needs. We need to adapt our infrastructure in order to offer clean, low carbon sources of energy generation that are fit for the future. We are bringing forward a project that will make a significant contribution to this process.</p>	<h2 style="margin: 0;">Net-zero emissions by 2050</h2> <p style="margin: 0; background-color: #8B4513; color: white; padding: 2px;">UK must reduce its emissions to meet a target of net-zero greenhouse gas emissions by 2050.</p>

What is proposed?

Sunnica Energy Farm is a proposed new energy farm connecting to the Burwell National Grid Substation in Cambridgeshire.

It would be located across three separate sites – Sunnica East, located close to Worlington and Freckenham, Sunnica West A, located close to Chippenham, and Sunnica West B, located close to Snailwell.

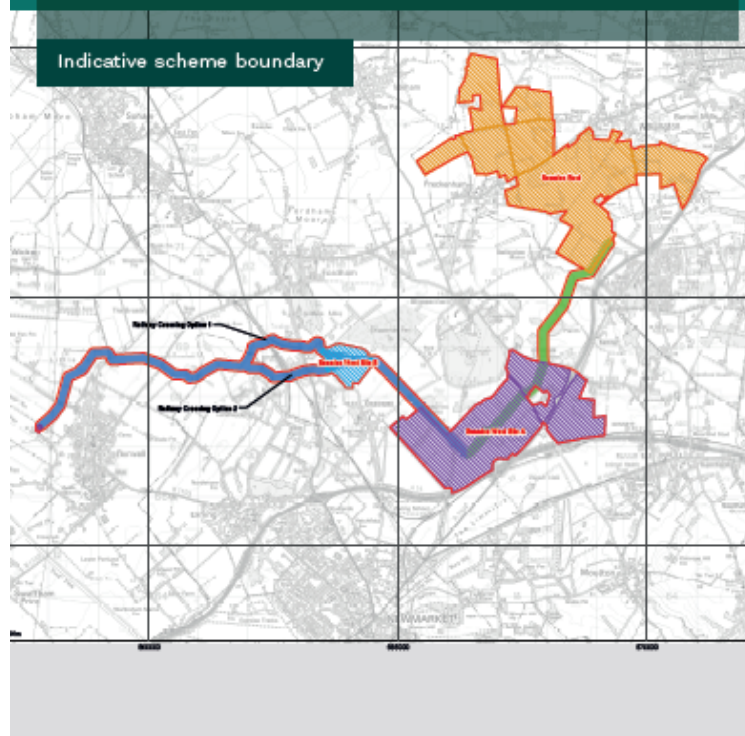
These will be connected to each other and the National Grid substation using underground cables. This will require an extension to the substation. The area that we have identified for the extension is a field immediately to the west of the existing substation.

At each of the solar farm sites, we would use ground-mounted photovoltaic (PV) panels to generate electricity from the sun. The scheme will also include two battery energy storage systems, which will

allow it to store, import and export electricity to and from the UK electricity grid.

Sunnica Energy Farm will allow for the generation, storage, import and export of up to 500 megawatts (MW) of electrical capacity. This has the potential to meet the energy needs of around 100,000 homes.

We are at an early stage in scheme development. We will consider feedback from this consultation as we develop the scheme in more detail.



Location

Solar farms need to be in locations with enough consistent light levels to generate sufficient electricity to be economically viable. In practice, this means that the south and east of the country are better locations for projects of this type.

We then need to find a location where there is sufficient transmission capacity in the National Grid for the scheme. We have secured a grid connection at the Burwell National Grid Substation in Cambridgeshire, which will be extended to accommodate the proposed grid connection.

Sites for solar farms need to be as close as possible to the point of grid connection. The land also needs to be available. We are predominantly aiming to use land which is not considered by the Government to be 'Best and Most Versatile'.

We are bringing forward our proposals at Sunnica East, Sunnica West A and Sunnica West B because these sites meet all of these criteria.



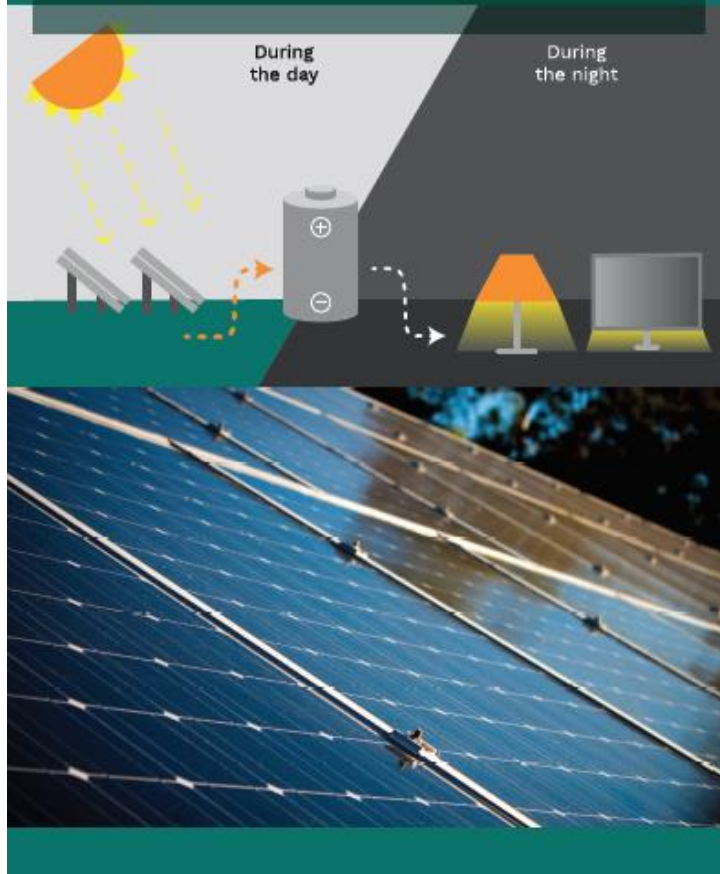
Technology - solar photovoltaic energy generation

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We are yet to make many of the decisions relating to the design of the solar panels, their dimensions, and the angle of their slope.

We need to progress our environmental assessments of the project sites to inform these decisions. We'll also take into consideration the feedback from this consultation.



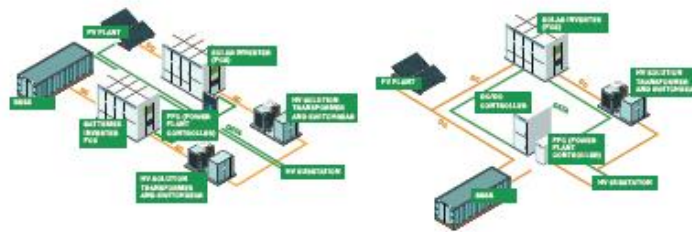
Technology

battery energy storage systems

We are also proposing to include two battery energy storage systems at Sunnica East and Sunnica West A and B. This technology will mean that electricity can be stored when more is being produced than is being used at a certain time, and released again when it is needed.

The battery energy storage system will be in containers around 4-5 metres in height. We are currently considering the best locations for the battery energy storage system at each site

– it will either be distributed around the sites or in a central location at each. Each option would have a different visual impact. Dependent on the outcome of our landscape and visual impact assessments, this could influence the type of mitigation we use at each site.



Connecting to the grid

Sunnica East, Sunnica West A and Sunnica West B will be connected to the UK electricity grid using an underground cable.

The grid connection cable will run from Sunnica East to Sunnica West A, then Sunnica West B, and onwards to the Burwell National Grid Substation. This will cross existing infrastructure including the railway line between Ely and Bury St Edmunds.

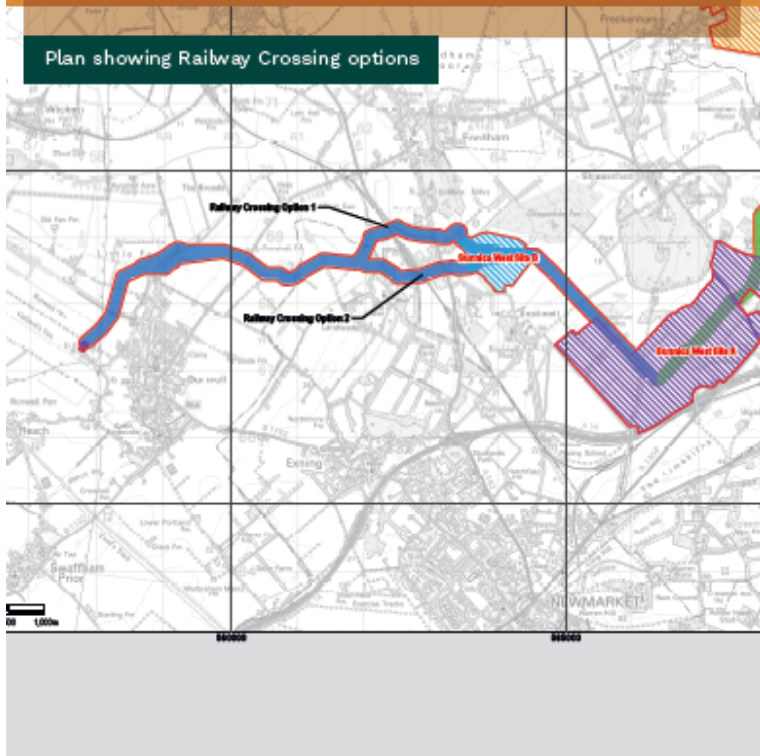
We're currently defining the precise route that the cable will follow, and are considering options within the corridor shown on the plan on this board. This includes two possible options for where we cross the railway line.

Our choice of route will also impact on the way we install the cable. Generally, we expect to use open cut trenching – but there are some places where we may need to use a technique known as directional drilling or boring. This involves using a targeted drill to make

a hole for the cable and pulling it through.

This would require the use of 'entry' and 'exit' working areas either side of the cable route. Following the completion of construction we would reinstate work sites to their former condition. There are a wide range of constraints we need to consider in making these decisions, including physical, ecological, cultural heritage and human interactions, technical engineering, legal and commercial considerations.

That means that we need to refine our options for the route over time, taking into account the surveys and environmental impact assessments that we are currently carrying out. We will present more information about this at the next round of consultation.





The planning process

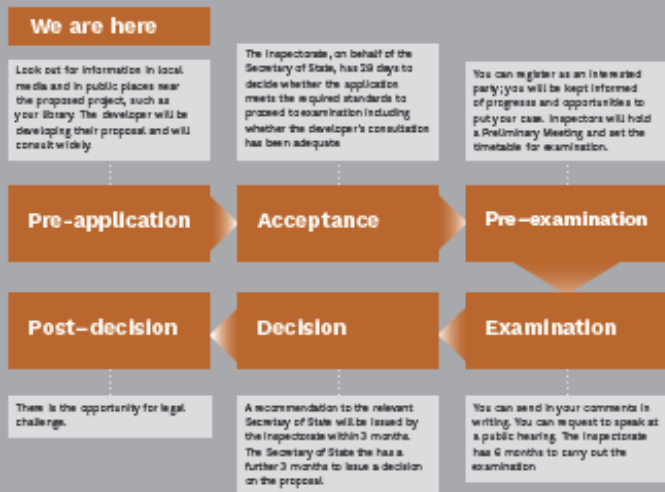
The scheme is classified as a Nationally Significant Infrastructure Project (NSIP) because its proposed generating capacity is higher than 50MW. NSIPs are major developments which require planning permission to be granted by the relevant Secretary of State through a Development Consent Order (DCO). This is a process established by the Planning Act 2008.

Unlike local planning permissions, which are considered by local authorities, DCO applications are made to the Planning Inspectorate. This administers the application process on behalf of the Secretary of State. In this case, the relevant Government Department is the Department for Business, Energy and Industrial Strategy (BEIS).

DCOs are governed by a fixed, statutory process which requires us to consult with the local community and

to carry out environmental assessments. It also provides a fixed role for local authorities and means we will be following a fixed, clear process to develop the scheme.

This current consultation is non-statutory consultation. We are carrying this out before our statutory consultation because we want to gain valuable feedback that will allow us to develop a better scheme and to ensure that later consultation is appropriate and effective.



Timeline

This is our first round of consultation on our proposals for Sunnica Energy Farm. We will conduct a round of statutory consultation in the winter, before submitting our DCO application, expected to be in summer 2020.



Next steps

Thank you for taking the time to attend this public exhibition.

We want to engage early with people in the local area to seek feedback on our proposals. We will use local knowledge to inform and refine our approach wherever possible.

We want to understand the issues that are important to you, as well as any suggestions you have as to how we can make improvements.

You can share your views by:

- 1) Completing a questionnaire here today
- 2) Taking away a questionnaire and returning it to
FREEPOST reference
RTRB-LUUJ-AGBY,
C/O Newgate Communications,
50 Basinghall Street,
London, EC2V 5DE
- 3) Completing a questionnaire
online at www.sunnica.co.uk

We are consulting between **17 June 2019** and **28 July 2019**. We'd be very grateful if you could share your response by the closing date of the consultation.

For further information, please contact us directly on **0808 168 7925** or info@sunnica.co.uk.



Following the non-statutory consultation, we will consider all views we receive, continue our technical assessments, and prepare our scheme design. We will present more information on this at the statutory consultation later in the year.

Your comments will be analysed by Sunnica Ltd and any of its appointed agents. Copies may be made available in due course to the Secretary of State, the Planning Inspectorate and other relevant statutory authorities so that your comments can be considered as part of the Development Consent Order (DCO) application process. We will request that your personal details are not placed on public record and will be held securely by Sunnica Ltd in accordance with the data protection law and will be used solely in connection with the consultation process and subsequent DCO application and, except as noted above, will not be passed to third parties.

A.1.1.6 Non-statutory consultation questionnaire

CONSULTATION QUESTIONNAIRE 17 JUNE 2019 TO 28 JULY 2019

Thank you for taking an interest in Sunnica Energy Farm, our proposal for a new energy farm at sites in Suffolk and Cambridgeshire. We are holding a non-statutory consultation on our proposals between 17 June 2019 and 28 July 2019. We would like to know what you think about our scheme proposals.

You can share your views with us by completing this consultation questionnaire. We will consider all views we receive, continue our technical assessments, and prepare our scheme design. We will present more information on this at a further statutory consultation later in the year.

1. What do you think we need to consider in terms of:

a) The design of Sunnica East?

b) The design of Sunnica West?

c) The design of our cable routes?

d) Environmental impacts?

2. We are currently proposing that the cables associated with Sunnica Energy Farm should be underground. Do you have any comments on this and the route we are currently proposing?

3. We are considering whether the battery storage element of the scheme should be spread around Sunnica East and Sunnica West or concentrated at particular locations. Do you have any

comments on this?

4. Do you any information relevant to the scheme and/or local environment which you think we should take into account?

5. Are there any specific enhancements locally you feel could be included as part of the scheme?

6. Is there anything you would like to know more about at the next round of events?

Telephone: _____

**Email
address:** _____

Please tick the boxes below as appropriate:

Age:

0-19

20-39

40-59

60-79

79+

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Occupation:

Student

Part-time

Full-time

Retired

Unemployed

--	--	--	--	--

All consultation questionnaires should be returned by **28 July 2019** to: FREEPOST reference RTRB-LUJJ-AGBY c/o Newgate Communications, Sky Light City Tower, 50 Basinghall Street, London, EC2V 5DE or info@sunnica.co.uk. You can also complete this consultation questionnaire online at www.sunnica.co.uk.

Your comments will be analysed by Sunnica Ltd and any of its appointed agents. Copies may be made available in due course to the Secretary of State, the Planning Inspectorate and other relevant statutory authorities so that your comments can be considered as part of the Development Consent Order (DCO) application process. We will request that your personal details are not placed on public record and will be held securely by Sunnica Ltd in accordance with the data protection law and will be used solely in connection with the consultation process and subsequent DCO application and, except as noted above, will not be passed to third parties.

Appendix A-4: Copies of stakeholder written responses received for the non-statutory consultation

- A.1.1.7 Cadent Gas
- A.1.1.8 Cambridgeshire County Council Waste Authority
- A.1.1.9 Canal and Rivers Trust
- A.1.1.10 Chippenham Parish Council
- A.1.1.11 East Cambridgeshire District Council
- A.1.1.12 The Environment Agency
- A.1.1.13 Freckenham Parish Council
- A.1.1.14 Kennett Garden Village
- A.1.1.15 National Grid
- A.1.1.16 National Trust
- A.1.1.17 Matt Hancock MP
- A.1.1.18 RSPB
- A.1.1.19 Suffolk County Council and West Suffolk Council
- A.1.1.20 Suffolk Chamber of Commerce
- A.1.1.21 Suffolk Preservation Society
- A.1.1.22 Hydrology and Operations Team (Environment Agency)
- A.1.1.23 National Grid Gas Transmission
- A.1.1.24 Swaffham Internal Drainage Board
- A.1.1.25 Ramblers, Newmarket and District Council
- A.1.1.26 Moulton Parish Council

A.1.1.7 Cadent Gas



Plant Protection
Cadent
Block 1: Floor 1
Brick Kiln Street
Hinckley
LE10 0NA

E-mail: plantprotection@cadentgas.com

Telephone: +44 (0)800 688588
0800 111 999*

National Gas Emergency Number:
0800 40 40 90*

* Available 24 hours, 7
days/week. Calls may be
recorded and monitored.

www.cadentgas.com

Date: 15/07/2019

Our Ref: EA_GE3B_3SWP_566779

Your Ref: : Sunnica-WSP-ACC-20190614-2223134 4 RC

RE: Proposed Works, National Grid substation, Burwell

Thank you for your enquiry which was received on 11/07/2019.

Please note this response and any attached map(s) are valid for 28 days.

An assessment has been carried out with respect to Cadent Gas Limited, National Grid Electricity Transmission plc's and National Grid Gas Transmission plc's apparatus. Please note it does not cover the items listed in the section "Your Responsibilities and Obligations", including gas service pipes and related apparatus.

For details of Network areas please see the Cadent website

[REDACTED] or the enclosed documentation.

As your works are at a "proposed" stage, any maps and guidance provided are for information purposes only. This is not approval to commence work. You must submit a "Scheduled Works" enquiry at the earliest opportunity and failure to do this may lead to disruption to your plans and works. Plant Protection will endeavour to provide an initial assessment within 14 days of

receipt of a Scheduled Works enquiry and dependent on the outcome of this, further consultation may be required.

In any event, for safety and legal reasons, works must not be carried out until a Scheduled Works enquiry has been completed and final response received.

As your proposed activity is in close proximity to National Grid's Transmission assets we have referred your enquiry/consultation to our Asset Protection team for further detailed assessment. We request that you do not commence work or take further action with regards to your proposal until you hear from us. We will endeavour to contact you within 21 days from the date of this response. Please contact us at [REDACTED] if you have not had a response within this time frame.

Your Responsibilities and Obligations

The "Assessment" Section below outlines the detailed requirements that must be followed when planning or undertaking your scheduled activities at this location.

It is your responsibility to ensure that the information you have submitted is accurate and that all relevant documents including links are provided to all persons (either direct labour or contractors) working for you near Cadent and/or National Grid's apparatus, e.g. as contained within the Construction (Design and Management) Regulations.

This assessment solely relates to Cadent Gas Limited, National Grid Electricity Transmission plc (NGET) and National Grid Gas Transmission plc (NGGT) and apparatus. This assessment does **NOT** include:

Cadent and/or National Grid's legal interest (easements or wayleaves) in the land which restricts activity in proximity to Cadent and/or National Grid's assets in private land. You must obtain details of any such restrictions from the landowner in the first instance and if in doubt contact Plant Protection.

Gas service pipes and related apparatus

Recently installed apparatus

Apparatus owned by other organisations, e.g. other gas distribution operators, local electricity companies, other utilities, etc.

It is **YOUR** responsibility to take into account whether the items listed above may be present and if they could be affected by your proposed activities. Further "Essential Guidance" in respect of these items can be found on either the [National Grid](#) or [Cadent](#) website.

This communication does not constitute any formal agreement or consent for any proposed development work; either generally or with regard to Cadent and/or National Grid's easements or wayleaves nor any planning or building regulations applications.

Cadent Gas Limited, NGGT and NGET or their agents, servants or contractors do not accept any liability for any losses arising under or in connection with this information. This limit on liability applies to all and any claims in contract, tort (including negligence), misrepresentation (excluding fraudulent misrepresentation), breach of statutory duty or otherwise. This limit on liability does not exclude or restrict liability where prohibited by the law nor does it supersede the express terms of any related agreements.

If you require further assistance please contact the Plant Protection team via e-mail [REDACTED] or via the contact details at the top of this response.

Yours faithfully

Plant Protection Team

ASSESSMENT

Affected Apparatus

The apparatus that has been identified as being in the vicinity of your proposed works is:

High or Intermediate pressure (above 2 bar) Gas Pipelines and associated equipment

Low or Medium pressure (below 2 bar) gas pipes and associated equipment. (As a result it is highly likely that there are gas services and associated apparatus in the vicinity)

Electricity Transmission underground cables and associated equipment

Electricity Transmission overhead lines

Above ground electricity sites and installations

Requirements

BEFORE carrying out any work you must:

Refer to the attached cable profile drawings (if any) which provide details about the location of National Grid's high voltage underground cables.

Carefully read these requirements including the attached guidance documents and maps showing the location of apparatus.

Contact the landowner and ensure any proposed works in private land do not infringe Cadent and/or National Grid's legal rights (i.e. easements or wayleaves). If the works are in the road or footpath the relevant local authority should be contacted.

Ensure that all persons, including direct labour and contractors, working for you on or near Cadent and/or National Grid's apparatus follow the requirements of the HSE Guidance Notes HSG47 - 'Avoiding Danger from Underground Services' and GS6 – 'Avoidance of danger from overhead electricpower lines'. This guidance can be downloaded free of charge at [REDACTED]

In line with the above guidance, verify and establish the actual position of mains, pipes, cables, services and other apparatus on site before any activities are undertaken.

GUIDANCE

High Pressure Gas Pipelines Guidance:

If working in the vicinity of a high pressure gas pipeline the following document must be followed: 'Specification for Safe Working in the Vicinity of Cadent and/or National Grid High Pressure Gas Pipelines and Associated Installations - Requirements for Third Parties' (SSW22). This can be obtained from:
[REDACTED]

Dial Before You Dig Pipelines Guidance:

[REDACTED]

Working Near National Grid Electricity Transmission equipment:

If you are carrying out any work in proximity to an overhead line or any excavation that may be near an underground cable then please consult National Grid Technical Guidance Note 287 that can be found at
[REDACTED]
[REDACTED]

[REDACTED] Further guidance related to underground cables can also be found at
[REDACTED]
[REDACTED]

Excavating Safely - Avoiding injury when working near gas pipes:
[REDACTED]
[REDACTED]

Standard Guidance

Essential Guidance document:

[REDACTED]

General Guidance document:

[REDACTED]

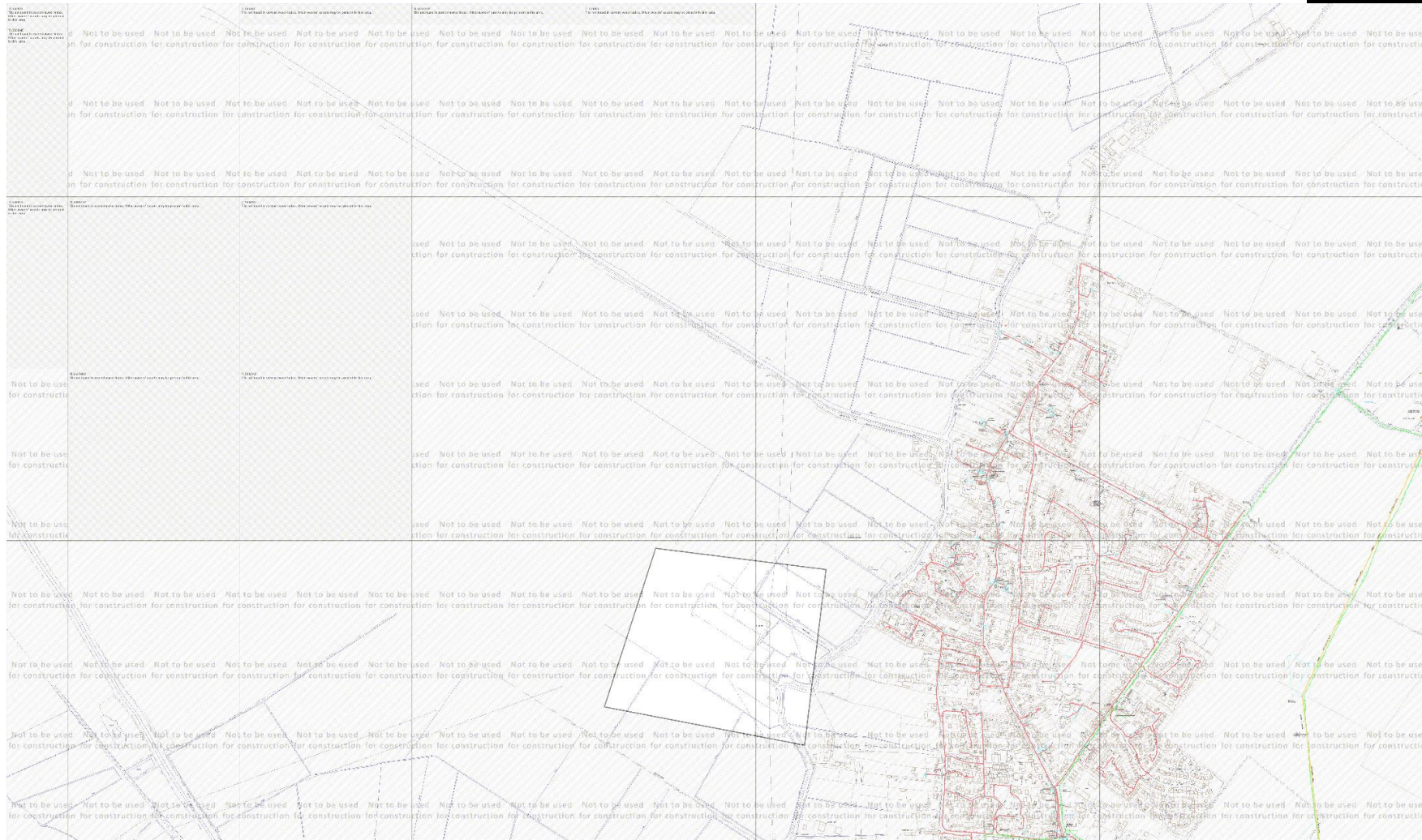
Excavating Safely in the vicinity of gas pipes guidance (Credit card):

[REDACTED]

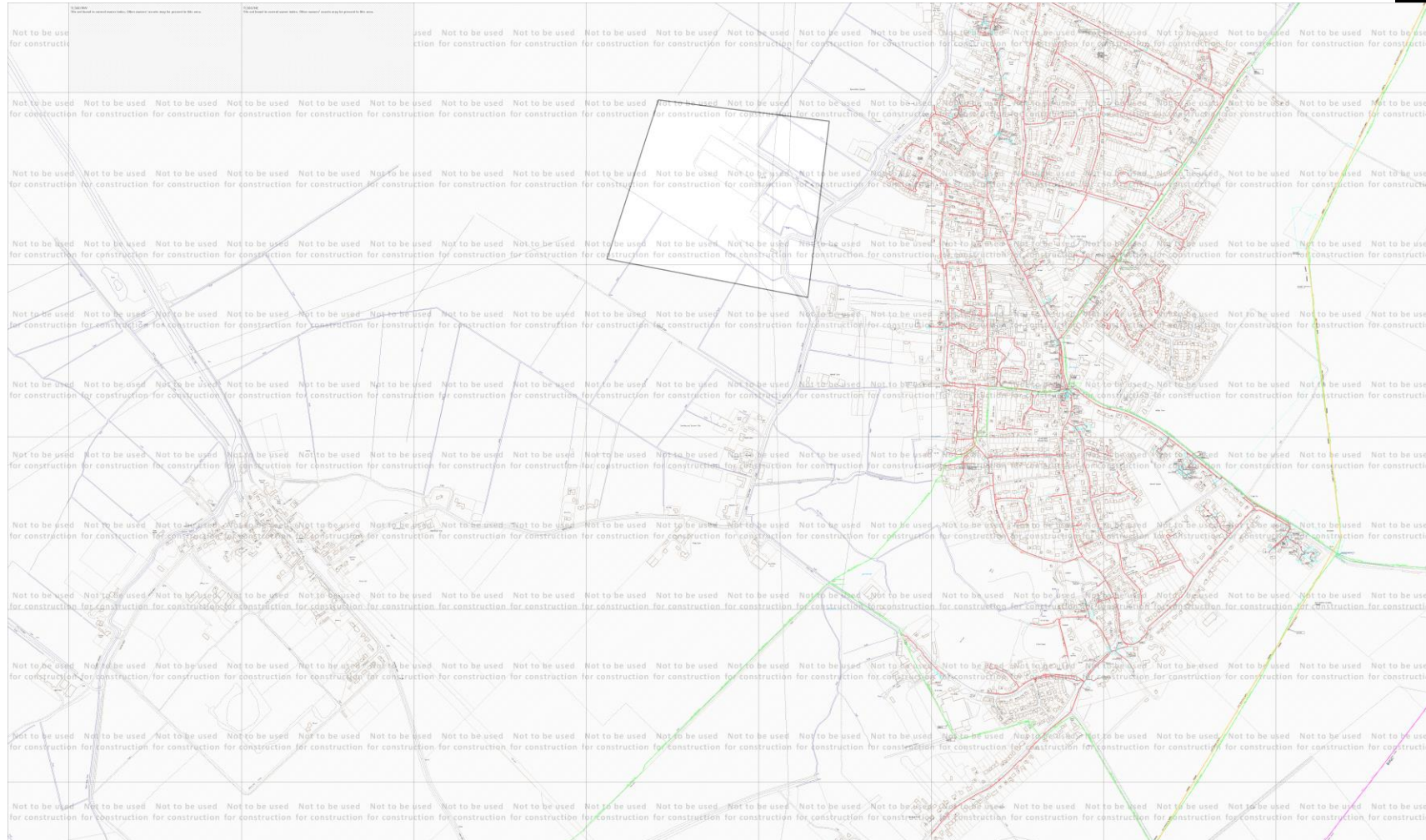
Excavating Safely in the vicinity of electricity cables guidance (Credit card):

[REDACTED]

Copies of all the Guidance Documents can also be downloaded from the [National Grid](#) and [Cadent](#) websites.



ID: EA_GE3B_3SWP_566779		View extent: 4120m, 2440m	Map not to be used for construction	Map 1 of 3 (GAS: A-1)
USER: Rachel Carruthers	LP MAINS		<p>This plan shows those pipes owned by Cadent Gas Limited in its role as a Licensed Gas Transporter (GT). Gas pipes owned by other GTs, or otherwise privately owned, may be present in this area. Information with regard to such pipes should be obtained from the relevant owners. The information shown on this plan is given without warranty, the accuracy thereof cannot be guaranteed. Service pipes, valves, syphons, stub connections, etc., are not shown but their presence should be anticipated. No liability of any kind whatsoever is accepted by Cadent Gas Limited or their agents, servants or contractors for any error or omission. Safe digging practices, in accordance with HSG47, must be used to verify and establish the actual position of mains, pipes, services and other apparatus on site before any mechanical plant is used. It is your responsibility to ensure that this information is provided to all persons (either direct labour or contractors) working for you on or near gas apparatus. The information included on this plan should not be referred to beyond a period of 28 days from the date of issue.</p>	MAPS Plot Server Version 1.11.0
DATE: 15/07/2019	IP MAINS			<p>Cadent Your Gas Network</p>
DATA DATE: 14/07/2019	LHP MAINS			
REF.: Sunnica-WSP-ACC-20190614	NHP MAINS			
MAP REF: TL5767				
CENTRE: 557882, 267843			Requested by: Sunnica Ltd	
<p>Some examples of Plant Items:</p>		<p>0m 200m Approximate scale 1:10000 on A3 Colour Landscape</p>	<p>This plan is reproduced from or based on the OS map by Cadent Gas Limited, with the sanction of the controller of HM Stationery Office. Crown Copyright Reserved. Ordnance Survey Licence number 100024886</p>	

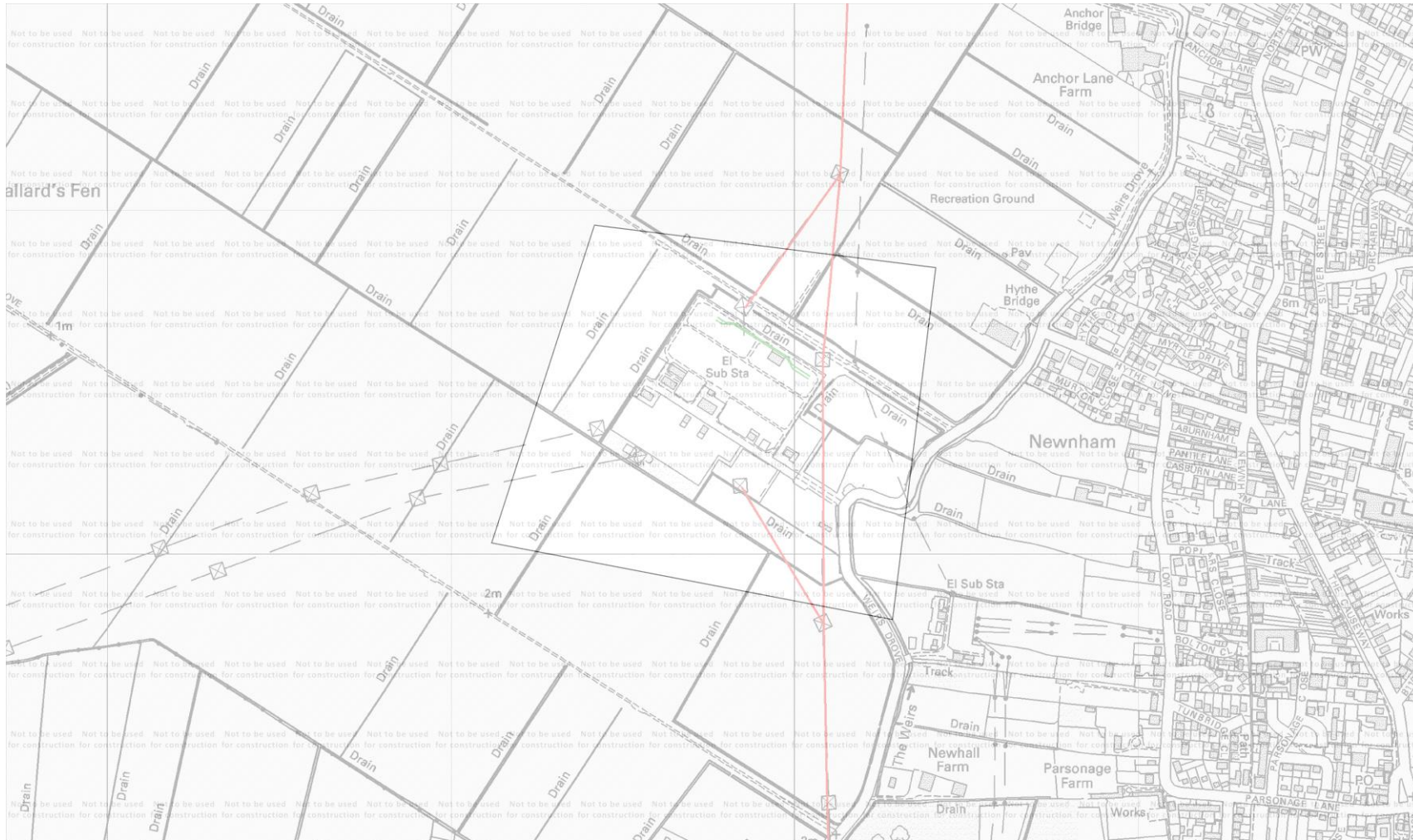



ID: EA_GE3B_3SWP_566779 USER: Rachel Carruthers DATE: 15/07/2019 DATA DATE: 14/07/2019 REF.: Sunnica-WSP-ACC-20190614 MAP REF: TL5786 CENTRE: 557882, 266540		View extent: 4120m, 2440m 0m 200m Approximate scale 1:10000 on A3 Colour Landscape		Map not to be used for construction This plan shows those pipes owned by Cadent Gas Limited in its role as a Licensed Gas Transporter (GT). Gas pipes owned by other GTs, or otherwise privately owned, may be present in this area. Information with regard to such pipes should be obtained from the relevant owners. The information shown on this plan is given without warranty, the accuracy thereof cannot be guaranteed. Service pipes, valves, syphons, stub connections, etc., are not shown but their presence should be anticipated. No liability of any kind whatsoever is accepted by Cadent Gas Limited or their agents, servants or contractors for any error or omission. Safe digging practices, in accordance with HSG147, must be used to verify and establish the actual position of mains, pipes, services and other apparatus on site before any mechanical plant is used. It is your responsibility to ensure that this information is provided to all persons (either direct labour or contractors) working for you on or near gas apparatus. The information included on this plan should not be referred to beyond a period of 28 days from the date of issue.		Map 2 of 3 (GAS: B-1) MAPS Plot Server Version 1.11.0 Your Gas Network Requested by: Sunnica Ltd This plan is reproduced from or based on the OS map by Cadent Gas Limited, with the sanction of the controller of HM Stationery Office. Crown Copyright Reserved. Ordnance Survey Licence number 100024886	
Some examples of Plant Items: Valve: Death of Cover: Syphon: Diameter Change: Material Change: Out of Standard Service:							

GAS: A-1

GAS: B-1

User: Rachel.Carruthers
Organisation: Sunnica Ltd
Reference: : Sunnica-WSP-ACC-20190614-2223134 4 RC
Job ID: EA_GE3B_3SWP_566779
Full Grid Extents: 4120m x 3743m
Single Map Extents: 4120m x 2440m
Date: 15/07/2019



ID: EA_GE3B_3SWP_566779 USER: Rachel.Carruthers DATE: 15/07/2019 DATA DATE: 18/02/2019 REF.: Sunnica-WSP-ACC-20190614 MAP REF: TL5767 CENTRE: 557882, 267191	View extent: 2060m, 1220m Underground cables Overhead lines 0m 100m Approximate scale 1:5000 on A3 Colour Landscape	<p>Map not to be used for construction</p> <p>This plan shows those cables owned by National Grid Electricity Transmission plc in its role as a Licensed Electricity Transporter (ET). Electricity cables owned by other ETs, or otherwise privately owned, may be present in this area. Information with regard to such cables should be obtained from the relevant owners. The information shown on this plan is given without warranty, the accuracy thereof cannot be guaranteed. Ancillary equipment such as cooling systems and communication cables are not shown but their presence should be anticipated. No liability of any kind whatsoever is accepted by National Grid Electricity Transmission plc or their agents, servants or contractors for any error or omission. Safe digging practices, in accordance with HS(G)147, must be used to verify and establish the actual position of cables and other apparatus on site before any mechanical plant is used. It is your responsibility to ensure that this information is provided to all persons (either direct labour or contractors) working for you on or near electricity apparatus. The information included on this plan should not be referred to beyond a period of 28 days from the date of issue.</p>	Map 3 of 3 (ELECTRIC) MAPS Plot Server Version 1.11.0  Requested by: Sunnica Ltd This plan is reproduced from or based on the OS map by National Grid Electricity Transmission plc, with the sanction of the controller of HM Stationery Office. Crown Copyright Reserved. Ordnance Survey Licence number 100024241
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ENQUIRY SUMMARY

Received Date 11/07/2019

Your Reference: Sunnica-ESP-ACC-20190614-2223134 4 RC

Location Centre Point: 557882, 267191

X Extent: 648

Y Extent: 576

Postcode: CB25 0BP

Location Description: Nationalgrid substation, burwell

Map Options

Paper Size: A3

Orientation: LANDSCAPE

Requested Scale: 2500

Actual Scale: 1:10000 (GAS), 1:5000 (ELECTRIC)

Real World Extents: 4120m x 2440m (2 maps) (GAS), 2060m x 1220m (ELECTRIC)

Recipients pprsteam@cadentgas.com

Enquirer Details

Organisation Name: Sunnica Ltd

Contact Name: Douglas Johnson

Email Address: info@sunnica.co.uk

Telephone: 0800 014 576

Address: Sky Light City Tower, 50 Basinghall Street, London, EC2V 5DE

Description of Works

Proposed new energy farm connecting to the Burwell National Grid substation. . It would be located across three separate sites, these will be connected to each other and the substation using underground cables.

Enquiry Type

Proposed Works

Activity Type

Utility Works

Work Types

Work Type: Deep Excavation (greater than or equal to 0.3m)

Work Type: Solar Farm

A.1.1.8 Cambridgeshire County Council Waste Authority

Sunnica Energy Farm non-statutory public consultation

SurveyMonkey

#60

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, July 17, 2019 3:37:09 PM
Last Modified: Wednesday, July 17, 2019 3:41:13 PM
Time Spent: 00:04:04
IP Address: 208.46.163.7

Page 1: Sunnica Energy Farm - non-statutory consultation

Q1 What do you think we need to consider in terms of:

c) the design of our cable routes?

see answer to Q2

Q2 We are currently proposing that the cables associated with Sunnica Energy Farm should be underground. Do you have any comments on this and the route we are currently proposing?

Waste Management -

Grid connection Route A appears to go adjacent to, or through the safeguarded waste management site, Plantation Farm, Kennet. This is safeguarded under Policy CS30 of the adopted Cambridgeshire and Peterborough Minerals and Waste Core Strategy 2011, and Policy W8BB of the associated Site Specific Proposals Plan 2012. Given, the importance of safeguarded waste management facilities which make a significant contribution to the management of Cambridgeshire's waste, and taking into account adopted policy, this matter should be addressed in the proposals. Policy CS30 is clear states that development must only be permitted where it is demonstrated that the proposed development will not be prejudice existing or future planned waste management operations. The proposal will need to address this.

Q3 We are considering whether the battery storage element of the scheme should be spread around Sunnica East and Sunnica West or concentrated at particular locations. Do you have any comments on this?

-

Q4 Do you any information relevant to the scheme and/or local environment which you think we should take into account?

-

Q5 Are there any specific enhancements locally you feel could be included as part of the scheme?

-

Q6 Is there anything you would like to know more about at the next round of events?

-

Sunnica Energy Farm non-statutory public consultation

SurveyMonkey

Q7 Do you have any further comments?

-

Q8 If you would like to be kept updated on this project, please provide your contact details below:

Name

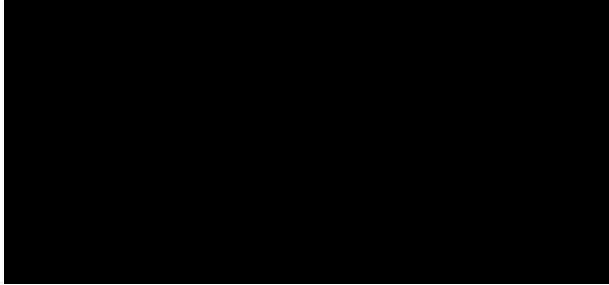
Address

Address 2

Postcode

Email Address

Phone Number



Q9 Please tick your age as appropriate:

Respondent skipped this question

Q10 Please tick your occupation as appropriate:

Respondent skipped this question

A.1.1.9 Canal and Rivers Trust



Info@sunnica.co.uk

Your Ref

Our Ref IPP - 107

Thursday 18 July 2019

Dear Sir

Sunnica Energy Farm

Waterway: N/A

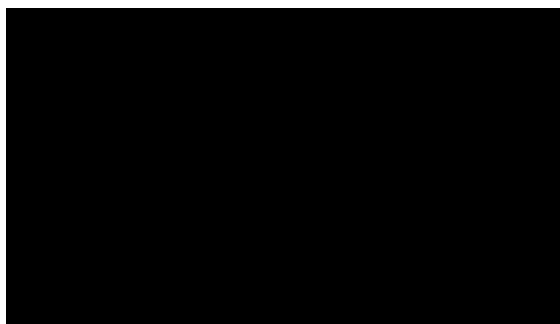
Thank you for your consultation.

We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Trust is a prescribed consultee in the Nationally Significant Infrastructure Projects (NSIPs) process.

The Trust has reviewed your proposals and on the basis that they appear unlikely to have any impact on our waterway we have no comment to make at this time.

If your proposals become significantly altered, we ask that you re-consult us in order that we can re-consider this position.

Please do not hesitate to contact me with any queries you may have.



A.1.1.10 Chippenham Parish Council

CHIPPENHAM PARISH COUNCIL.

CHIPPENHAMPARISHCOUNCIL@HOTMAIL.COM

27th July 2019

RTRB-LUUI-AGBY

C/O Newgate Communications

50 Basinghall Street

London

EC2V 5DE

Sunnica Energy Farm

Dear Sir

In regards to the proposal of Sunnica Energy Farm I am writing to inform you that Chippenham Parish Council object to the development for the following reasons:

Consultation process - not enough time or meaningful information has been provided to allow residents, parish council and other interested parties to fully consider this proposal

The total size of the development is too large

It is still unclear the exact location and size of the development. No further plans have been issued following the withdrawal of one of the landowners

The chosen location of the development – the council objects to the project using viable agricultural land rather than brownfield sites or sites such as alongside road junctions where the visual impact is less important and the ground cannot be used for other purposes. The land earmarked for this project has access to irrigation and can and does grow root vegetables and cereal crops. The council cannot support a scheme that takes viable arable land out of production.

Lack of clear understanding on how the development will impact wildlife and allow for healthy ground conditions.

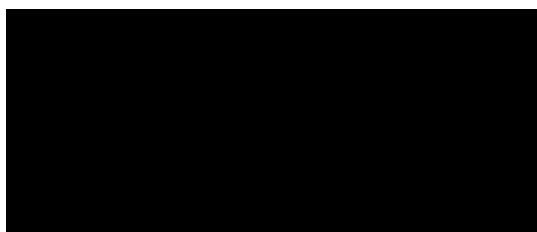
1/2

The parish council would like to see detailed answers to the following points about the scheme:

1. What is the possibility of permanent change of use status for the land in question and how will this effect small rural villages?
2. How will the scheme impact wildlife and ecology?
3. How will the developers mitigate the impact of the scheme on the locality?
4. Why have the developers chosen to target productive agricultural land rather than less fertile land?
5. What size scheme would still be economical enough to justify a large dedicated cable route?
6. Could the scheme be more acceptable if downsized to the point where a single large dedicated grid connection is not required?
7. Could the scheme be better managed with a CLT or other community based involvement?
8. What is the impact on the local area during construction and whilst the solar panels are in place?
9. What is Sunnica offering to the community in terms of compensation for having this scheme on their doorstep?
10. Are any of the materials in the scheme hazardous?
11. How is the removal of panels and making good of the land going to be managed?
12. What will happen about public footpaths, bridle paths and rights of way?

It is for the above reasons that Chippenham Parish Council cannot support this application in its current form or at its current scale.

Yours faithfully



A.1.1.11 East Cambridgeshire District Council



EAST CAMBRIDGESHIRE DISTRICT COUNCIL

THE GRANGE, NUTHOLT LANE, ELY,
CAMBRIDGESHIRE CB? 4EE

Telephone: Ely (01353) 665555

DX41001 ELY Fax: (01353) 665240

www.eastcambs.gov.uk

2nd August 2019

Dear Mr Woodisse

Re: Installation of solar voltaic panels, on site energy storage facilities and associated infrastructure at Land North Of Snailwell (West (North)) And Land South Of Chippenham Park (West(South)) Including Connecting Network Through To Burwell Sub Station And To Sunnica (East) In West Suffolk Norwich Road Kennett Suffolk

Thank you for your pre-application enquiry received in this department on the 13th June 2019. This letter outlines the discussions of our meetings held on the 19 June 2019 and 24 June 2019. The meetings only focused on visual impact, heritage (excluding archaeology) and ecology; this letter only focuses on these issues. It should also be noted that the Council has commented on the Scoping Opinion and these comments should still be referred to.

The following comments are made on the basis of the information provided. The issues raised may not be exhaustive, and should you submit a planning application other issues may arise which could affect the outcome of any application.

It is noted that the development is in the early stages and the exact maximum dimensions of the proposal have not been finalised; nor has the exact arrangement of batteries and solar panels been confirmed.

All planning applications are assessed against the statutory development plan for the District, which comprises the East Cambridgeshire Local Plan 2015 and the Cambridgeshire and Peterborough Minerals and Waste Plan 2012 and the appropriate policies are listed below. The Local Plan and the referenced policies are accessible via our website www.eastcambs.gov.uk, through the planning portal www.planningportal.gov.uk or a paper copy is available to view at the Council Offices.

The policies which are most relevant to your proposals are:

East Cambridgeshire Local Plan 2015

GROWTH1 Levels of housing, employment and retail growth

GROWTH 2 Locational strategy

GROWTH 3 Infrastructure requirements

GROWTH 4 Delivery of growth

GROWTH 5 Presumption in favour of sustainable development

ENV 1 Landscape and settlement character

ENV2 Design

ENV4 Energy efficiency and renewable energy in construction

ENV6 Renewable energy development

ENV7 Biodiversity and geology

ENV8 Flood risk

ENV9 Pollution

ENV 11 Conservation Areas

ENV12 Listed Buildings

ENV14 Sites of archaeological interest

ENV15 Historic parks and gardens

COM 1 Transport impact

COMB Parking provision

Supplementary Planning Documents

Cambridgeshire Flood and Water Supplementary Planning Document (SPD)

Contaminated Land

Renewable Energy (Commercial Scale) SPD

National Planning Policy Framework 2019

2 Achieving sustainable development

8 Promoting healthy and safe communities

9 Promoting sustainable transport

11 Making effective use of land

12 Achieving well-designed places

14 Meeting the challenge of climate change, flooding and coastal change

15 Conserving and enhancing the natural environment

16 Conserving & enhancing the historic environment

Technical Guidance to the National Planning Policy Framework

Landscape Visual Impact Assessment

As emailed to your colleague Clare Le Brecht on the 19 June 2019, it is expected that additional viewpoints are provided in order to assess the impact upon/from the 'Garden Village' extension to Kennett; which has a resolution to approve, subject to the completion of a S106 (18/00752/ESO).

It is also expected that additional viewpoints from Chippenham Road, Snailwell are provided looking in a southerly direction.

An additional viewpoint should be taken from Little Fen Drove, Burwell looking southwards towards the proposed extended substation .

Finally a viewpoint should be explored on Junction 38 (A14/A11) junction, due to the several raised roads in this area that will give a vantage point(s) over the proposed energy farm.

It is expected that all viewpoints will take into account both the summer and winter periods. In addition to this either viewpoints should be included to demonstrate the loss of planting or a methodology/scheme submitted to demonstrate how the proposal will protect this vegetation in the long term.

Heritage

As discussed in the meeting it is expected that additional viewpoints will be taken approximately half way down the Chippenham Hall avenue (leading towards the A14) in order to assess in greater detail the impact upon this Grade II Historic Garden. The damage to the setting of the historic avenue is likely to be the most significant harm to heritage from this proposal; you will need to carefully consider and mitigate against this harm to lower the harm to the lowest levels of less than substantial harm. With the amount of potential space (and that you have stated the exact dimensions of the proposal have not been finalised) to accommodate the development; the benefits of the proposal (renewable energy) would unlikely outweigh substantial harm (historic character/setting) to this heritage asset. You will, therefore, need to clearly demonstrate how the significance of this heritage asset has been measured, how the harm has been mitigated and the benefits of the proposal.

The viewpoints from Chippenham Hall (especially from the higher floors) is supported, as this will help determine the impact upon the setting of this Grade II Listed Building.

It is expected that the impact on High Lodge on the A1303 is considered and viewpoints considered from this building, as it appears as the original gatehouse to Chippenham Hall and defines this end of the Listed Historic Garden.

Badlingham Manor is a Grade II Listed Building and is within close proximity to the Energy Farm on the Suffolk Side. It is expected that viewpoints are taken from this Listed Building and the impact on its setting is fully considered.

It is supported that you are seeking to get viewpoints from the church towers in Chippenham and Snailwell; it is understood and accepted that this will be if accessible.

The Schedule Ancient Monument (SAM) of a Roman Villa located on the edge of the proposal on Snailwell Road and the bronze age barrows near the A11/A14 junction will need to be duly considered. With the proposal now extending towards Kennett, the impact upon this bronze age barrow will need to be considered.

Ecology

While the SSSI of Chippenham and Snailwell Fen is the most important ecological feature within the area, it is also noted the several County Wildlife Sites are located close to the site. However, the size of the development means the potential impact will be far greater than this. The substantial loss of agricultural land/change in environment will need to be considered and its impact upon biodiversity will need to be duly considered.

The developer has not at the time of the meeting completed several biodiversity surveys. It is not possible to comment until all these surveys have been undertaken, with a detailed methodology and then detail protection/mitigation/enhancement measures.

It is not possible to provide detailed comments on ecology until the surveys have been undertaken.

Conclusion

I would expect future pre-application to contain significant more detail and be firmer on the exact dimensions of the proposal. With the significant size of the proposal with both the possibility of substantial harm and benefits; greater detail must be provided in order for detailed and considered comments to be provided.

As with any proposal, the only way to fully test the merits of the proposed development would be through the submission of a formal planning application.

Please see attached a list of relevant documents which is to be used as guidance only. It may be when an application is submitted it comes to light further information is required, that has not been highlighted on this list.

Where specific design advice or examples of architectural buildings or styles have been given, please be aware that these are for illustrative purposes only in order to help inform the design process and are not a specific design instruction.

The above comments are made at Officer level only and do not prejudice any future decision, which may be taken by this Planning Authority. The information contained in this letter is based on the current situation and any future changes in National and Local Policies will not be reflected in this response. I hope this information is useful to you, and if you require any further advice please do not hesitate to contact me.

Yours sincerely,

A.1.1.12 Environment Agency



Luke Murray
Sunnica Ltd
c/o Newgate Communications
50 Basinghall Street
London
EC2V 5DE

Our ref: AC/2019/128466/02-L01

Date: 26 July 2019

Dear Mr Murray

SUNNICA ENERGY FARM

Thank you for your consultation.

We note that this is a non-statutory public consultation and there is no detailed information on design that has been presented at this stage.

On the 11th April 2019, we provided comments on the Environmental Impact Assessment (EIA) Scoping Opinion (letter attached). We generally agreed with the proposed scope of work and methods to be applied when carrying out the EIA. Therefore, we do not have further comments to make at the moment. We look forward to providing additional comments when the plans are developed further.

If you have any further queries please do not hesitate to contact us.

Yours sincerely

A.1.1.13 Freckenham Parish Council

FRECKENHAM PARISH COUNCIL

26th July 2019

RTRB-LUJ-AGBY
C/O Newgate Communications
50 Basinghall Street
London
EC2V 5DE

Dear Sirs

Sunnica Energy Farm

In regards to the proposal of Sunnica Energy Farm I would like to inform you that Freckenham Parish Council object to the proposal in its current form and at its current scale, subject to a proposed residents survey.

In Summary

- The size of the total site
- The loss of productive agricultural land
- Loss of country side views
- Noise pollution from construction and removal of the panels
- Loss of habitats for wildlife
- Operational noise and light pollution
- Negative affect on village settings
- Effect on human health including mental health
- Effect on property values in the area
- Potential Change of use from farm land

The outline of the land boundaries is totally incorrect as it includes areas where landowners have not even given consent to lease or “even been approached by Sunnica”

The Parish Council are also very concerned that the consultation period was too short and lacked valuable information for the Parish Council to gather more information on the site and Solar Farms to respond to the consultation in more detail.

However we have a meeting planned with yourselves on or around 6th September and as you have informed us you will take our further comments into consideration after we have had this meeting.

Details of objection

In regards to the proposal of Sunnica Energy Farm I would like to inform you that Freckenham Parish Council object to the proposal based on the following points:

- 1) The size of the total site proposed, as the Sunnica East site occupies all the land between the village of Freckenham and the surrounding villages of Worlington, Badlingham and West Row. Its impact on the local area is disproportionate.

- 1) The close proximity of the site to the village settlement boundary, e.g.
 - 1.1) the site boundary is within 30 metres of housing association properties in East View, Freckenham, designed for occupation by elderly residents in the area.
 - 1.2) The site completely encloses a farmhouse on the North side of the village
 - 1.3) The site boundary directly abuts gardens and amenity land for properties on the Eastern side of the village on Mildenhall Road and Elms Road.
- 2) The loss of productive agricultural land which is in constant use for crop production and livestock rearing.
- 3) The inclusion of smaller parcels of land in the proposal that are owned by local landowners who have not been identified by Sunnica before the consultation started.
- 4) The loss of valuable country side views across the important Breckland landscape:
 - 4.1) From properties in the village adjoining the site, and from the upper storeys of properties with views over the site,
 - 4.2) From registered footpaths and bridleways adjoining or passing through the site, all of which are in constant use.
 - 4.3) From roads such as:
 - 4.3.1) Mildenhall Road leading to Worlington (site both sides for about 1 mile)
 - 4.3.2) West Row Road leading to West Row (site both sides for about 1 mile)
 - 4.3.3) Elms Road leading to Badlingham and Red Lodge (site on one side for approximately ½ mile, then on both sides for a further ½ mile)
- 5) The loss of habitats for wildlife in the area such as:
 - 5.1) The managed habitats for stone curlews between Freckenham, Worlington and West Row,
 - 5.2) The deer habitats between Freckenham and Worlington, where the deer move freely between the woodland habitats and the Lea Brook.
- 6) The lack of any coherent and written design guidelines or constraints in any of the published consultation literature, with only vague statements of intention, such as:
 - 6.1) No information about the style or height of the panels proposed (e.g. east/west or south facing, size or height above the ground
 - 6.2) Very limited information about the siting of any battery storage facilities, expected to be in containers or buildings at a height of 2 storeys which would be clearly visible given the flat landscape in the area.
 - 6.3) No information about the proposal for the siting or design of inverters which would generate constant background humming noise while the panels or battery storage facilities are operating.
 - 6.4) No information about the design or method of screening and hedging with typical heights, typical widths of any field margins or green areas used in mitigation, or type and heights of fencing used as the boundary for security purposes.

- 1) The operational noise and light pollution from security required to protect the site
- 2) The blanket closure of footpaths, bridleways and green lanes, all in constant use, for a period of up to two years while construction of the site progresses, and the effect on the physical health of villagers unable to use these routes and forced to walk on busy roads (many without designated footpaths) instead.
- 3) The effect on the mental health of villagers concerned about the lack of meaningful engagement with the local community about the location and design of the site.
- 4) The negative affect on village settings, and the negative effect on property values while the scheme is proposed due to the confusion about the impact of the scheme.
- 5) The bundling together of the proposed 3 solar sites and battery storage facilities into a single application, resulting in to the NSIP classification which excludes the normal planning mechanisms and well-known consultation mechanisms in place for the local area.

The Parish Council are also very concerned that the consultation period was too short and poorly advertised.

- 6) Information leaflets were posted to residents in plain white envelopes, which meant that many villagers were unaware of their content or importance and simply discarded them as if they were irrelevant marketing materials
- 7) The design of the leaflets was very poor with very small text, lack of contrast between text and background, and a lack of description about the proposal, all of which excluded visually impaired residents from the communication.
- 8) A similar lack of descriptive information in local paid Newspaper advertisements, with small text sizes used.
- 9) Consultation events were not signposted or advertised outside the venues, either in advance or on the day.
- 10) Adjoining villages such as Fordham and Isleham had only days to respond to the scheme before the closing date, with their public exhibitions taking place on the 17th and 19th July respectively.

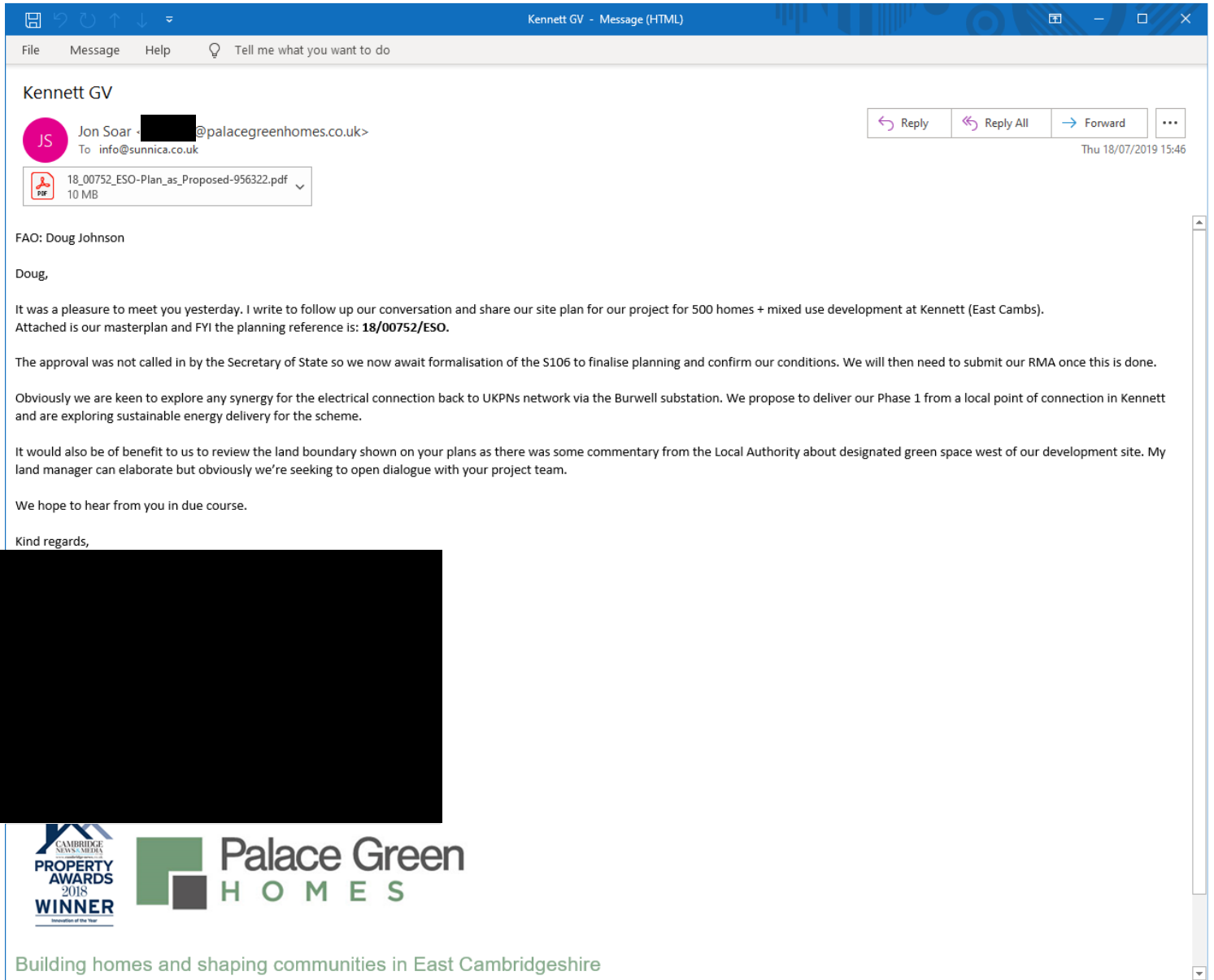
This lack of time, clarity and engagement by Sunnica has meant that Freckenham Parish Council have severe concerns about the effectiveness of the consultation in properly presenting the true impact of the scheme on parishioners and the local area.

However, through public Parish Council meetings, and engagement with parishioners, community organisations and groups in the village, the Parish Council has resolved to object to the proposal.

Freckenham Parish Council does not support the current Sunnica proposal in its current form or at its current scale.



A.1.1.14 Kennett Garden Village






- Key
- Existing context
- Existing houses / village
 - Existing Kennett C. P. School
 - Bus stop / bus stop station
 - 11m x 22m tennis (scheduled / unscheduled)
- Masterplan
- Village green
 - Primary school
 - Primary school playing fields
 - Village centre
 - Village square
 - Car park / delivery of housing
 - Commercial area
 - Existing green
 - Recreational
 - Soft build plan
 - Paved area road
 - Access to bus
 - Football field
 - Aluminium / community building
 - Children's play space
 - Market
 - Train station car park

Kennett Garden Village
 Illustrative Masterplan
 For Palace Green
 2020 APP1
 JTC

A.1.1.15 National Grid



National Grid house
Warwick Technology Park
Gallows Hill, Warwick
CV34 6DA

SUBMITTED ELECTRONICALLY:
info@sunnica.co.uk

03 July 2019

Dear Sir/Madam

SUNNICA ENERGY FARM

NON STATUTORY CONSULTATION

This is a response on behalf of National Grid Electricity Transmission PLC (NGET) and National GridGas PLC (NGG).

I refer to your letter dated 5th June 2019 in relation to the above proposed application and the non-statutory consultation event. Having reviewed the consultation booklet, I would like to make the following comments:

National Grid infrastructure within / in close proximity to the order boundary

Electricity Transmission

National Grid Electricity Transmission has high voltage electricity overhead transmission lines and substations within or in close proximity to the scoping area /proposed order limits. The overhead lines, and substations form an essential part of the electricity transmission network in England and Wales.

The details of the electricity assets are shown below:Substations

Burwell Main 400kV Substation

Burwell Main 132kV SubstationOverhead Lines

4ZM (400kV) overhead line Burwell Main – Walpole 1

Burwell Main – Walpole 2

Gas Transmission Infrastructure:

National Grid Gas has high pressure gas transmission pipelines, and associated apparatus, located within or in close proximity to the proposed order limits. The transmission pipelines form an essential part of the gas transmission network in England, Wales and Scotland:

Feeder Main 3 Roudham Heath to Great Wilbraham

I enclose plans showing the route of National Grid's overhead line, the gas transmission pipelines and the locations of the substations.

Specific Comments – Electricity Infrastructure:

National Grid's Overhead Line/s is protected by a Deed of Easement/Wayleave Agreement which provides full right of access to retain, maintain, repair and inspect our asset.

Statutory electrical safety clearances must be maintained at all times. Any proposed buildings must not be closer than 5.3m to the lowest conductor. National Grid recommends that no permanent structures are built directly beneath overhead lines. These distances are set out in EN 43 – 8 Technical Specification for "overhead line clearances Issue 3 (2004).

If any changes in ground levels are proposed either beneath or in close proximity to our existing overhead lines then this would serve to reduce the safety clearances for such overhead lines. Safe clearances for existing overhead lines must be maintained in all circumstances.

The relevant guidance in relation to working safely near to existing overhead lines is

contained within the Health and Safety Executive's () Guidance Note GS 6 "Avoidance of Danger from Overhead Electric Lines" and all relevant site staff should make sure that they are both aware of and understand this guidance.

Plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors when those conductors are under their worst conditions of maximum "sag" and "swing" and overhead line profile (maximum "sag" and "swing") drawings should be obtained using the contact details above.

If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.

Drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations or "pillars of support" of any existing tower. These foundations always extend beyond the base area of the existing tower and foundation ("pillar of support") drawings can be obtained using the contact details above.

National Grid Electricity Transmission high voltage underground cables are protected by a Deed of Grant; Easement; Wayleave Agreement or the provisions of the New Roads and Street Works Act. These provisions provide National Grid full right of access to retain, maintain, repair and inspect our assets. Hence we require that no permanent / temporary structures are to be built over our cables or within the easement strip. Any such proposals should be discussed and agreed with National Grid prior to any works taking place.

Ground levels above our cables must not be altered in any way. Any alterations to the depth of our cables will subsequently alter the rating of the circuit and can compromise the reliability, efficiency and safety of our electricity network and requires consultation with National Grid prior to any such changes in both level and construction being implemented.

Gas Infrastructure

The following points should be taken into consideration:

National Grid has a Deed of Grant of Easement for each pipeline, which prevents the erection of permanent / temporary buildings, or structures, change to existing ground levels, storage of materials etc.

Pipeline Crossings:

Where existing roads cannot be used, construction traffic should ONLY cross the pipeline at previously agreed locations.

The pipeline shall be protected, at the crossing points, by temporary rafts constructed at ground level. The third party shall review ground conditions, vehicle types and crossing frequencies to determine the type and construction of the raft required.

The type of raft shall be agreed with National Grid prior to installation.

No protective measures including the installation of concrete slab protection shall be installed over or near to the National Grid pipeline without the prior permission of National Grid.

National Grid will need to agree the material, the dimensions and method of installation of the proposed protective measure.

The method of installation shall be confirmed through the submission of a formal written method statement from the contractor to National Grid.

Please be aware that written permission is required before any works commence within the National Grid easement strip.

A National Grid representative shall monitor any works within close proximity to the pipeline to comply with National Grid specification T/SP/SSW22.

A Deed of Consent is required for any crossing of the easement.

Cable Crossings:

Cables may cross the pipeline at perpendicular angle to the pipeline i.e. 90 degrees.

A National Grid representative shall supervise any cable crossing of a pipeline.

Clearance must be at least 600mm above or below the pipeline.

Impact protection slab should be laid between the cable and pipeline if cable crossing is above the pipeline.

A Deed of Consent is required for any cable crossing the easement.

Where a new service is to cross over the pipeline a clearance distance of 0.6 metres between the crown of the pipeline and underside of the service should be maintained. If this cannot be achieved the service shall cross below the pipeline with a clearance distance of 0.6 metres.

General Notes on Pipeline Safety:

You should be aware of the Health and Safety Executives guidance document HS(G) 47 "Avoiding Danger from Underground Services", and National Grid's specification for Safe Working in the Vicinity of National Grid High Pressure gas pipelines and associated installations - requirements for third parties T/SP/SSW22.

National Grid will also need to ensure that our pipelines access is maintained during and after construction.

Our pipelines are normally buried to a depth cover of 1.1 metres however; actual depth and position must be confirmed on site by trial hole investigation under the supervision of a National Grid representative. Ground cover above our pipelines should not be reduced or increased.

If any excavations are planned within 3 metres of National Grid High Pressure Pipeline or, within 10 metres of an AGI (Above Ground Installation), or if any embankment or dredging works are proposed then the actual position and depth of the pipeline must be established on site in the presence of a National Grid representative. A safe working method agreed prior to any work taking place in order to minimise the risk of damage and ensure the final depth of cover does not affect the integrity of the pipeline.

Excavation works may take place unsupervised no closer than 3 metres from the pipeline once the actual depth and position has been confirmed on site under the supervision of a National Grid representative. Similarly, excavation

with hand held power tools is not permitted within 1.5 metres from our apparatus and the undertaken with NG supervision and guidance.

work is

To view the SSW22 Document, please use the link below:

To download a copy of the HSE Guidance HS(G)47, please use the following link:

Further Advice

We would request that the potential impact of the proposed scheme on National Grid's existing assets as set out above and including any proposed diversions is considered in any subsequent reports, including in the Environmental Statement, and as part of any subsequent application.

Where any diversion of apparatus may be required to facilitate a scheme, National Grid is unable to give any certainty with the regard to diversions until such time as adequate conceptual design studies have been undertaken by National Grid. Further information relating to this can be obtained by contacting the email address below.

Where the promoter intends to acquire land, extinguish rights, or interfere with any of National Grid apparatus, protective provisions will be required in a form acceptable to it to be included within the DCO.

National Grid requests to be consulted at the earliest stages to ensure that the most appropriate protective provisions are included within the DCO application to safeguard the integrity of our apparatus and to remove the requirement for objection. All consultations should be sent to the following email address: box.landandacquisitions@nationalgrid.com.

I hope the above information is useful. If you require any further information please do not hesitate to contact me.

The information in this letter is provided notwithstanding any discussions taking place in relation to connections with electricity or gas customer services.

Yours faithfully

National Grid is a trading name for:
National Grid Electricity Transmission plc
Registered Office: 1-3 Strand, London
WC2N 5EH Registered in England and
Wales, No 2366977

National Grid is a trading name for:
National Grid Gas plc
Registered Office: 1-3 Strand, London
WC2N 5EH Registered in England
and Wales, No 2006000

A.1.1.16 National Trust



National
Trust



Sunnica

Via email:
info@sunnica.co.uk

Dear Sir/Madam

Reference: Sunnica Energy Farm

Address: Sites close to Worlington, Chippenham & Snailwell Proposal: Proposed new energy farm

The National Trust was founded in 1895 as an independent charity to hold and manage, in perpetuity for the benefit of nation, countryside and historic buildings in England, Wales and Northern Ireland. The Trust fulfils its statutory responsibilities as laid down in the National Trust Acts, through ownership and direct management of the properties in its care. The National Trust owns and manages Wicken Fen, which is approximately ½ a mile to the east of National Grid substation at Burwell and parts of cable corridor outlined in the Sunnica Energy Farm indicative scheme.

Wicken Fen is a rare surviving remnant of un-drained fen and the UK's oldest nature reserve. It is one of only four surviving fragments of the great fen basin of East Anglia, as over 99.9% of the former Fens have now been replaced by arable cultivation. Now one of Europe's most important wetlands, it supports an abundance of wildlife. There are more than 8,500 species, including a spectacular array of plants, birds and dragonflies, many of which are UK Biodiversity Action Plan priority rare species. The site is also designated as a SSSI, Ramsar site and SAC all of which are underpinned by the wetland habitat it provides. The site forms part of a network of SSSI's in that locality which together make a significant contribution to the biodiversity of Cambridgeshire.

The National Trusts' interest in this area is extensive; our Wicken Fen Vision is an ambitious landscape-scale conservation project which stretches from Wicken all the way south into Cambridge. We have a long term aspiration to create a mosaic of new wildlife habitats and space for people to explore on foot, bike, horse and boat. This strategic greenspace project is identified as part of the Cambridgeshire Green Infrastructure Strategy and is identified as such in the Local Plan Policies of East and South Cambridgeshire District Councils.

In addition, the Trust has the benefit of a Section 8 covenant over Chippenham Fen. It is section 8 in the National Trust Act 1937 that enables the Trust to take the benefits of such covenants to protect specific features of the land such as an historic building, view or landscape, even when there is no Trust land immediately adjoining the covenanted land. Chippenham Fen is designated for its ecological importance as a SSSI, SAC and Ramsar site. The covenant was given to the Trust in 1946 in order to protect the ecological nature of the fen at a time when farmers were felling and draining the surrounding area. The covenant stipulations are very specific with regards to protecting the flora and fauna of the site as well as the hydrology.

In principle the Trust is supportive of renewable energy developments to help meet the country's low carbon energy needs and thereby tackle climate change. We're proud of the measures that we have taken to increase the generation of our energy from renewable sources, including solar, hydro and small scale wind schemes. However, each proposal must demonstrate that they are located, designed and on a scale that avoids compromising the special qualities of its locality. Where environmental impacts can be accommodated they can offer an opportunity to encourage habitat enhancements.

We would like to raise the following points with relation to the Sunnica energy farm proposal:

The pylons and sub-stations at Burwell substation already have a significant visual impact on Wicken fen and the surrounding area and we would be concerned about any new infrastructure which increases this.

Chippenham Fen NNR (SSSI, SAC, Ramsar) is important for its fen habitats, ditches, wet woods and associated aquatic invertebrates and breeding bird assemblages. The behavioural and habitat requirements of these features have to be taken into consideration.

Changes to hydrology due to solar farm infrastructure installation, including cabling works, need careful consideration as this could impact on fenland and other habitat.

We would be happy to meet with the developer to discuss our concerns as the project develops.

A.1.1.17 Matt Hancock MP

info@sunnica.co.uk

Sunnica Ltd
FREEPOST reference
RTRB-LUUI-AGBY
C/o Newgate Communications
50 Basinghall Street
London, EC2V 5DE

28 July 2019
MH/hd

Dear Sirs,

Sunnica East and West 500MW Solar Energy Farm

I am writing on behalf of my constituents as the Member of Parliament for West Suffolk regarding your proposals for Sunnica solar energy farm.

I am in favour of the benefits of solar power when used nationally, but also recognise that proposals should be done in sympathy with the local community. As the Government has set out: We need to make sure residents' views are taken into consideration, and people are given the time to consider the proposals, and comment on them.

Greg Barker: DECC Paper 2013

[REDACTED]

Having met residents and seen Sunnica's proposals, I am concerned that you have not engaged sympathetically with residents. I have concerns particularly about the proximity to Worlington and Freckenham which are in my constituency, together with the loss of view and local amenities for villagers, also the increased movement of traffic in the area.

I support the submission by West Suffolk Council and Suffolk Country Council, which sets out the minimum reassurances needed for this project to be viable locally.

I hope you will consider these concerns when developing your proposal. I would also welcome the opportunity to meet you to discuss them in more detail.

Yours faithfully,

[REDACTED]

The Rt Hon Matt Hancock MP

A.1.1.18 RSPB



THIS CORRESPONDENCE REFERS TO THE PRESENCE OF SCHEDULE 1 BREEDING BIRDS AND SHOULD BE REDACTED ACCORDINGLY BEFORE ENTERING THE PUBLIC DOMAIN

Sunnica Energy Ltd,
c/o Newgate
Communications,
50 Basinghall Street,
London
EC2V 5DE

By email only to info@sunnica.co.uk

Your ref: RTRB-LUJJ-AGBY

Our ref: 785503

26 July 2019

Dear Sir/madam,

Re: Sunnica Energy Farm non-statutory public consultation

Development Consent for the Sunnica Energy Farm, Suffolk/East Cambridgeshire–DC/19/0472/EIASCO

The RSPB wishes to make the following comments regarding the potential environmental impacts of this proposal.

Our understanding of your scheme

The proposal comprises 3 sites (Sunnica East, Sunnica West- north and Sunnica West- south) with connecting cable routes between the sites and to the National Grid.

The Sunnica East site contains a habitat of hedgerows, field margins, deciduous woodland, shrub and dispersed trees within a matrix of agricultural fields.

The Sunnica East site location is 640m to 2.8km from national (SSSI and NNR), European Natura2000 (SPA and SAC) and international (Ramsar) wildlife sites.

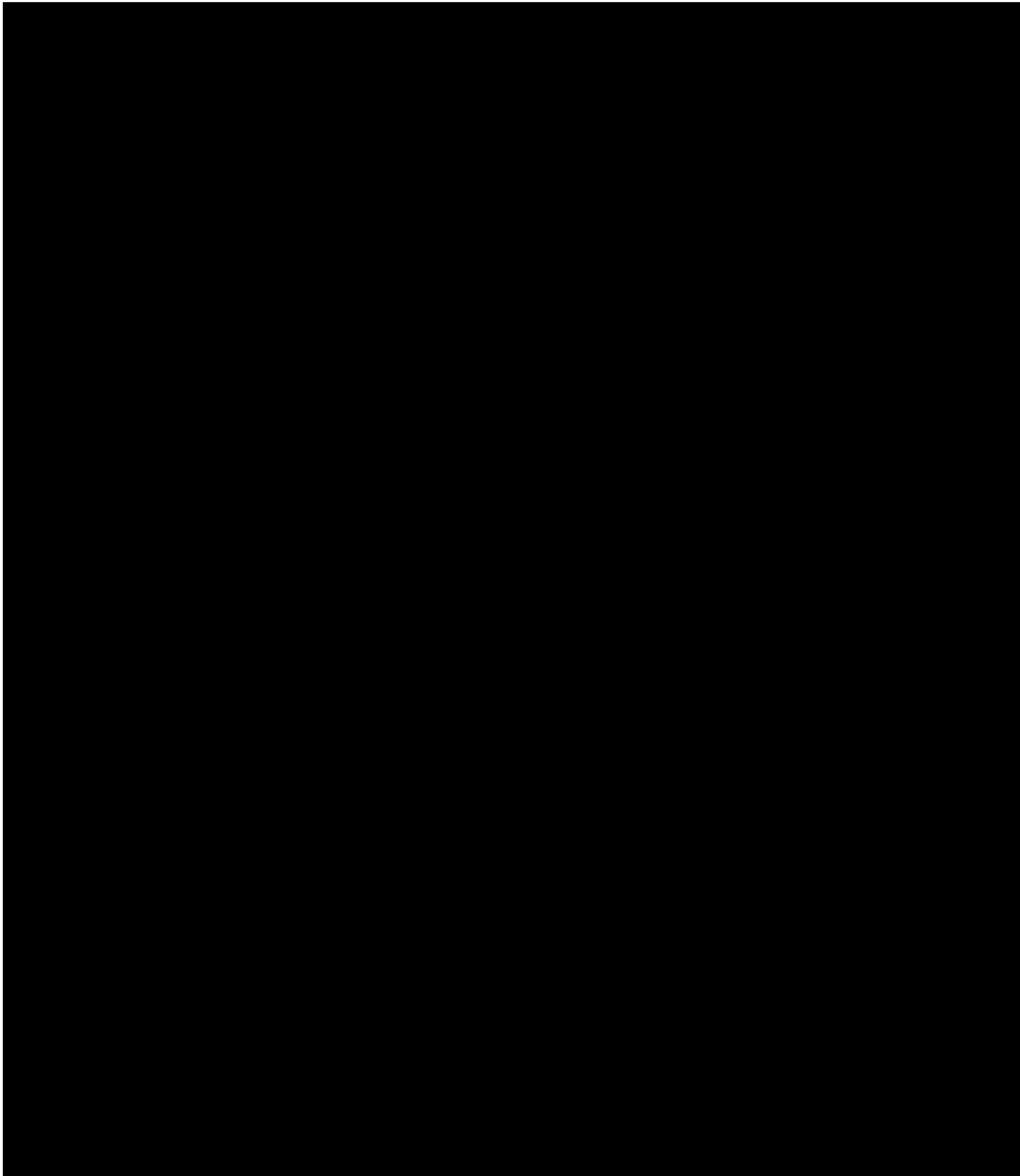
The Sunnica East and West sites are located within a flood zone.

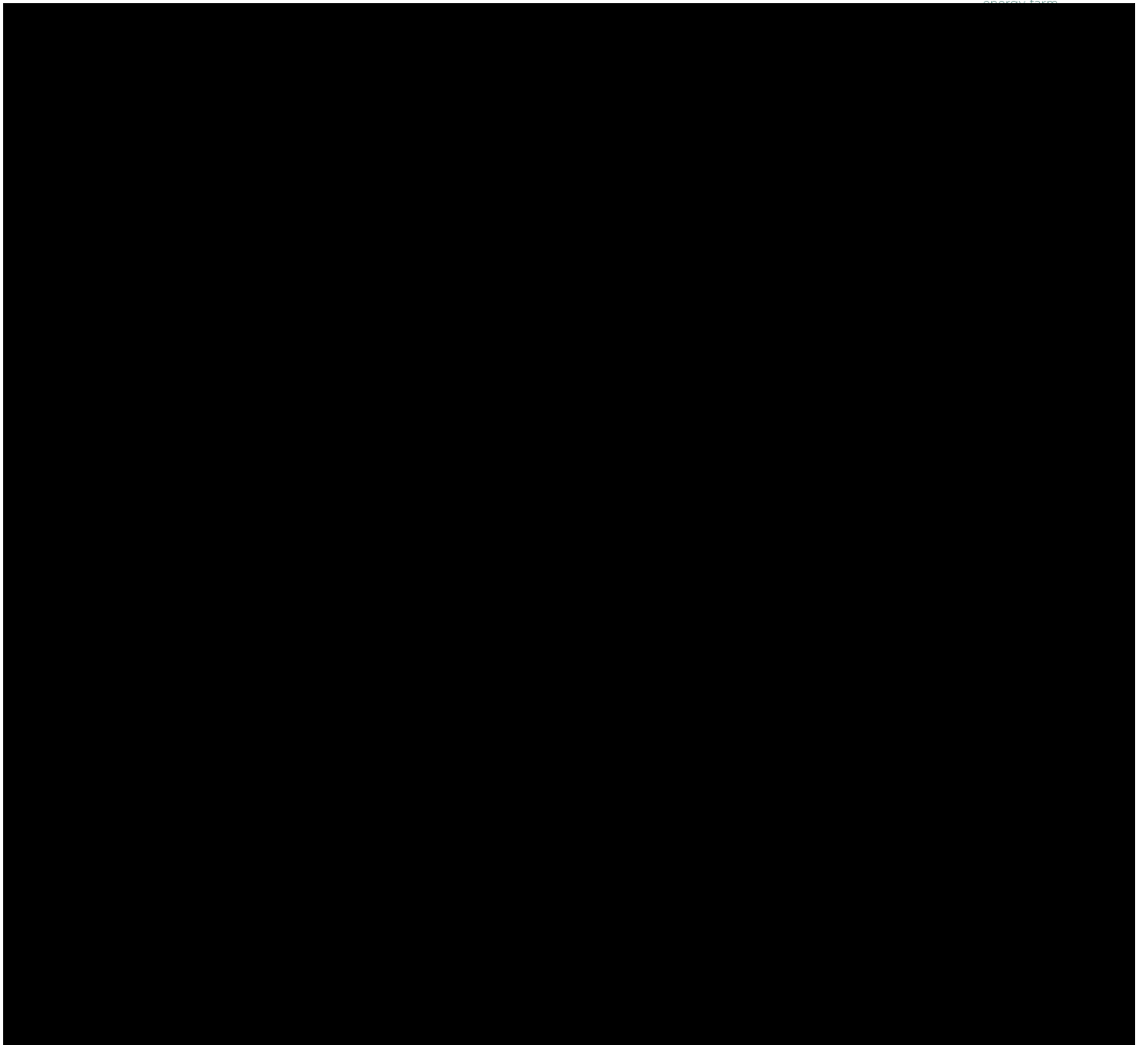
The Sunnica West sites contain hedgerow, tree stands/ shelter belts, grassland and woodland habitats, together with parkland containing mature trees. The location of the former Chippenham Hall carriageway and parkland suggests the presence of veteran trees of significant age, biological, aesthetic or cultural importance.

The Sunnica West (north) site is immediately adjacent to Fenland Special Area of Conservation (SAC) Chippenham Fen Ramsar and National Nature Reserve (NNR), Chippenham Fen and Snailwell Poor's Fen Site of Special Scientific Interest (SSSI).

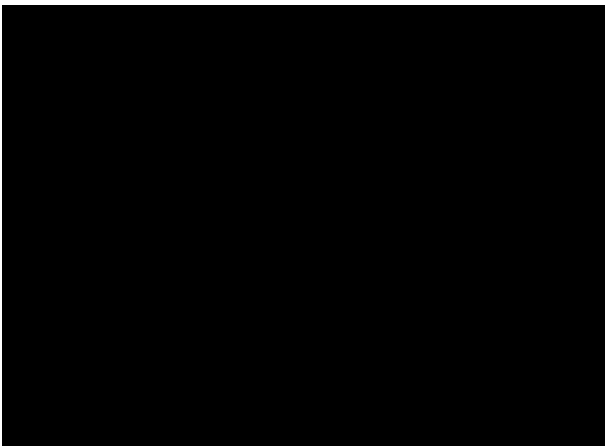
Cable routes will be installed using underground cables between the three power generation sites and to an existing National Grid Substation

Survey requirements and Potential Impacts

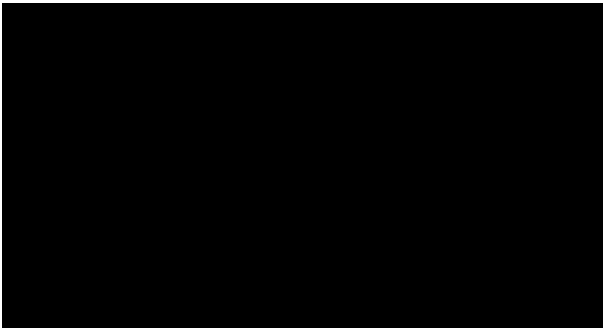




Yours sincerely,



A.1.1.19 Suffolk County Council and West Suffolk Council



Dear Sir/Madam,

Thank you for the opportunity to comment on the Sunnica Energy Farm Non-statutory public consultation report. This is a joint response of the two Suffolk local authorities relevant under Section 43(1) of the Planning Act 2008. It is understood that Cambridgeshire County Council and East Cambridgeshire District Council will also provide responses relating to the parts of the scheme that fall in their respective areas. This response should be read in conjunction with the joint response submitted to PINS in respect of the EIA Scoping Report dated March 2019.

The proposal is an unprecedented development both in terms of scale and nature and can be expected to have significant likely impacts on local communities and the environment. It is clear that the proposal will require an exemplary approach to design, mitigation and compensation to address these impacts.

The following text comprises our answers to the consultation questions. We have focused on questions 1a), 1d), 4 and 5 throughout this letter, with comments grouped by our own areas of responsibility.

County as Minerals & Waste Planning Authority

Sunnica East and the associated electricity transmission cable falls within a Minerals Consultation Area and includes in its entirety Bay Farm Quarry, Worlington which is an operational sand and gravel quarry and inert waste landfill site. There is also a concrete batching plant and inert waste recycling facility on that site.

Minerals Core Strategy Policy 5 “Safeguarding mineral resources” applies:

[Redacted]

Minerals Specific Site Allocations Policy MSSA1 “Proposed Sites” applies:

[Redacted]

Draft Suffolk Minerals & Waste Local Plan (SMWLP) Policies MP9 “Safeguarding of port

and rail facilities for the manufacture of concrete, asphalt and recycled materials” MP10 “Minerals consultation and safeguarding areas” and WP18 “Safeguarding of waste management sites” apply:

[REDACTED]

Draft SMWLP Policy MS10: Worlington, also applies.

[REDACTED]

In interpreting the above policies, Suffolk County Council as Minerals & Waste Planning Authority is mindful of the non-irreversible nature of the proposed development. However it will also be concerned to safeguard existing minerals and waste developments and potential future areas of extraction including those which might offer further potential extensions in the foreseeable future to the existing quarry in addition to those already identified in the SMWLP. It is also possible that existing previously worked and restored areas of the quarry might be utilised for the proposed solar farm development so long as it does not prejudice the overall objectives of the proposed restoration such as biodiversity net gain.

County as Lead Local Flood Authority

It is noted in the consultation report that the environmental assessment process will cover flood risk and water resources. This is welcomed, but we would add that this should specifically include a Flood Risk Assessment and Drainage Strategy (FRA/DS) which should be submitted as part of the EIA. The Drainage strategy must follow national guidance (Non-Statutory Technical Standards for SuDS, BS8582:2015 & Ciria SuDS Manual C753) and our local policy (Appendix A of Suffolk Flood Risk Management Strategy). We expect the drainage strategy to utilise infiltration type drainage pending preliminary site investigations and ground-intrusive investigations. But please make sure the FRA/DS assesses all areas of hardstanding and all building types of the development i.e. substations and battery compound and not just the main solar farm itself. BRE 365 infiltration testing has been referenced in the scoping report and we will expect data gathered from these tests to form the basis of the FRA/DS.

The greatest potential impact to the water environment will be during the construction phase of the development when site works have potential for ground compaction and pollution, this is especially important given the site will likely use infiltration. SCC will expect the EIA to distinguish between main phases of the development lifecycle (construction, operation, decommissioning) and its impact on the water environment (hydrology and hydrogeology). A construction surface water management plan (CSWMP) or similar should be submitted in support of the EIA to outline procedures that will be in place to reduce impacts of the construction phase.

Any alterations or construction within watercourses will need prior land drainage consent from SCC under the Land Drainage Act 1991.

County and District Ecology

The authorities will be expecting a site-specific plan for managing biodiversity. To inform this, a full suite of surveys for wildlife and habitats must take place. Ecological design should be informed by the mitigation hierarchy and be guided by the site's location, in Suffolk, on the edge of the Brecks. In addition, monitoring must take place throughout construction and operation and this must inform a site management plan and a dedicated management team.

These should be prepared even at the pre-DCO stage so that fears regarding negative impacts can be resolved and a clear path to biodiversity net gain can be mapped.

We will expect all surveys to meet the appropriate guidelines and guidance (especially those produced by CIEEM and Natural England). All data should be shared with the relevant Biological Records Centres, which for Suffolk is the Suffolk Biodiversity Service

We expect the bare bones of a monitoring strategy to be shared as early as possible. An idea of the various parts of a Construction and Environment Management Plan (CEMP) should be submitted as soon as the biodiversity data informs the contents of such a plan. This will also be informed by the mitigation hierarchy.

Along with the CEMP, we shall expect a long-term Landscape and Environment Management Plan (LEMP) to be, at least, sketched out prior to DCO submission which will show who will be undertaking the site's management and how they will be informed by and react to the essential and on-going monitoring. This will be informed by the mitigation hierarchy and include realistic proposals for Biodiversity Net Gain.

We do not expect the CEMP and the LEMP to contain exhaustive detail until such time as the relevant survey data has been collated and analysed. We should, however, have an agreed structure into which these essential documents can fit prior to DCO submission.

County and District Landscape

Site Description and context – Sunnica East

The site is located west of the A11 and stretches out between the villages of West Row (to the north), Freckenham (to the south-west) and Worlington (to the north-east). Its southern edge is north-west of Red Lodge.

Within the red line, the land use is predominantly agricultural. However, there are also active gravel extraction sites, woodlands, rows of trees, road-side hedges, minor roads linking the above villages, and some PRowS.

The land is relatively flat to gently sloping, allowing far-reaching views of open countryside, often with wooded horizons, where roadside hedges do not confine the view.

The landscape is perceived as tranquil, and human activity is present in the form of the agricultural land use. Overall the landscape appears to have changed very little over the

last hundred years, providing a sense of time-depth.

Despite the vast extent of Sunnica East, public access to the site is limited. There are few PRoWs in the area, which lends the existing ones potentially greater importance and value. Similarly, the country lanes from where views of the site are to be expected, are important areas from which this landscape is perceived.

Roadside hedges and existing blocks of vegetation (such as small woodlands) will be crucial to successful mitigation; there should be an assumption to retain and strengthen existing structural vegetation (hedges, tree lines, tree belts, woodlands), and creative ways sought to work around them, wherever possible. New mitigative planting will however also need to take into account the open nature of the landscape in this area.

Likely landscape and visual effects

The proposed solar farm (in combination with Sunnica West and the necessary links to Burwell Power Station) will be the largest solar farm in the UK, if implemented. The area potentially affected is vast (approx. 800ha for Sunnica East). The landscape between the villages of West Row, Freckenham and Worlington will be transformed substantially.

Due to the scale of this proposal, it is insufficient to consider this solar farm as a development sitting within a particular landscape. The implementation of this proposal is more akin to the creation of an entirely new landscape, with its own character, which will be experienced from within as well as from the outside.

This has implications for the approach to the baseline studies, landscape and visual assessment and the design and mitigation process.

Baseline studies (local landscape character and sensitivity) and preliminary design

The proposals of Sunnica East will mean a profound change of the landscape character around and between the three villages of West Row, Worlington and Freckenham. The potential effects on the residents of these villages are likely to be greater than the sum of the potential roadside views. There needs to be consideration of the 'cumulative' effect within the Sunnica East site, as it is equivalent to multiple traditional solar plants. Local parish level landscape character assessments should be carried out, assessing the value, sensitivity and expected change of the landscape for each of the three villages and the connecting routes between them, key views need to be identified, and measures taken within the design to protect and retain these.

An accurate understanding of the local landscape character, the local landscape sensitivity and key views from and to the villages will be essential.

Based on this it will be possible to discern areas within the red line that will be more suitable for solar panels/ battery stations etc. and areas that are more sensitive to change and that will need to be protected (heat map). These are then the areas which can be set aside to enhance the local landscape character and achieve the biodiversity net gain. It is important

that these areas are identified through detailed field work. A formulaic approach (i.e. standard setbacks of the development from roads etc.) will be insufficient and possibly counter-productive.

Visual assessment

The suggested viewpoints for the Visual Assessment, require some refinement in their exact location.

However, they only represent viewpoints looking towards the proposal site from locations outside of, or from the edge of the red line.

Due to the scale of the proposal, and the fact that the connecting roads between the three villages traverse the proposal site, internal viewpoints will be critical to comprehend the magnitude of the change that is to be expected.

Winter viewpoints will be essential for full assessment.

For comments on individual viewpoints and recommendations for additional viewpoints, please see Appendix 1, at the end of this document.

Design and enhancement

The approach to design needs to address and integrate both local sensitivities (such as key views on the settlement edge) and overall requirements, (such as a green infrastructure).

Given the extent of the red line, the opportunities to achieve ecological benefits (biodiversity net gain), a well-designed landscape and improved pedestrian access through links to existing footpaths should be fully realised.

It will not be possible to completely hide a project of this scale. It will be insufficient to screen the edges. The challenge for the design will be to avoid a solar panel desert and instead aim to create a 'solar park landscape', that proudly showcases this large-scale renewable energy farm, integrated successfully into the surrounding landscape.

Examples of detailed design should be provided for key areas (such as PRow's, stretches of road, settlement edge locations). This will allow to clarify and agree the design approach and desired outcomes at an early stage.

It is further considered that a project of this significance is likely to require detailed design to be subjected to an External Design Review Panel of Landscape Architects prior to discharge of the conditions relating to landscape.

Conclusion

The Sunnica Energy Farm proposal is of a very large scale, which requires an iterative

design process, utilising the large size of the whole proposal site to address its effects on a small scale, localised level.

Emerging principles, strategies and priorities for the assessment and design include (but are not limited to) the following:

Landscape

- The design and layout of Sunnica must be sensitive to place. For Sunnica East this does not only refer to the Suffolk LCA landscape character types (Estate sandlands and Rolling estate chalklands) and the Norfolk and Suffolk Brecks LCA, but also to the local character of the villages (West Row, Freckenham and Worlington) and their interconnecting routes.
- Cumulative effects between each part of the project must be assessed and minimised.
- Landscape mitigation must be a bespoke response to local requirements, emerging from detailed landscape character and sensitivity assessments, as well as being part of a wider landscape strategy for the whole site.
- Key views must be identified, and measures taken within the design to protect and retain these.
- Views of solar panels or other structural parts of the development (such as storage battery stations) from villages (both from residential properties and public spaces, such as streets and squares) must be avoided.

Public Amenity

- Existing amenities, such as PRoWs, both permissive and statutory, are to be retained and enhanced and must be fully considered as part of the design. Any rights of way affected directly or indirectly by the development should be restored to their original, or an agreed, enhanced, state after construction is completed.
- The possibilities for new/additional PRoWs should be fully explored.
- The potential effects of the development on an existing travellers' site within the red line must be fully assessed and minimised.

Ecology

- The design of the site must support West Suffolk Council's Natural greenspace study for the former Forest Heath area, which sets out a recreation strategy to support growth in the Local Plan
[REDACTED]
- The effects of the development must result in a net gain for biodiversity. Possible ways to achieve this include:
 - creation of replacement habitat;
 - maintaining the connectivity of wildlife corridors across the site;
 - avoidance of the most sensitive habitats and species;
 - suitable construction methods.
- Ecologically sensitive areas, such as river valley locations, should be prioritised as areas for mitigation.

Overall Design

- The requirements for cohesive green infrastructure, incorporating public amenity, landscape and ecology (biodiversity net gain) must form an integral part of the overall

design.

- All temporary infrastructure used to facilitate the construction of Sunnica East must have consideration of the visual amenity of permissive and statutory routes and must be removed following construction. The visual impact of any remaining 'footprint' or remnant of temporary development must be minimised.
- It is considered that for key areas (such as PRoWs, important stretches of roads, and settlement edge locations) examples of detailed design should be provided with the submission of the DCO such that the Examining Authority and consultees can clearly understand the approach to design and mitigation.
- A project of this significance is likely to require detailed, post-consent design to be subjected to an External Design Review Panel of Landscape Architects prior to discharge of the requirements relating to landscape. The decision rests with the local authority, West Suffolk Council.
- A detailed scheme for the protection of environmental and landscape assets during construction will be required. It is anticipated that details of this will form part of the Construction Environment Management Plan (CEMP) as a requirement of the DCO.
- The design of security systems and lighting should be such as to minimise adverse landscape and visual impacts. Infrared security lighting will be preferable in terms of minimising adverse effects on wildlife and the nocturnal character of the landscape.

Decommissioning

- A detailed scheme of decommissioning and restoration of the site and an appropriate bonded fund must be in place. This can be expected to be a requirement of the DCO.

County Archaeology

This extremely large proposal affects an area of known archaeology recorded in the County Historic Environment Record (HER). Within the red line development boundary itself, both above and below ground archaeological remains and extensive multi-period find scatters have been recorded (see baseline information below), with large numbers of further archaeological finds and features recorded surrounding the Sunnica East site. However, the majority of the proposed development area has never been subject to systematic archaeological investigation and, therefore, the character, extent and significance of surviving below ground heritage assets which will be impacted upon by this scheme has yet to be defined.

The proposed development (including temporary land take areas for construction, infrastructure improvement works, landscaping and screening works and any other mitigation works involving ground disturbance) would have a direct impact upon heritage assets as the planned works will damage or destroy any surviving remains which exist within the site, however, without further assessment, the impacts cannot be fully understood. The scale of this proposed development scheme means that it has the potential to cause wholesale destruction of an archaeological landscape. Thorough desk top assessment and field evaluation is therefore needed to allow the archaeological potential of the different parts of the study area and therefore the likely impacts of the proposed development, to be fully assessed. Evaluation will provide sufficient baseline information to enable design decisions to be made and to inform planning decisions. The potential impact of this development upon the

setting of designated heritage assets as well as the historic landscape also needs to be assessed.

Our detailed archaeological comments to the Planning Inspectorate also apply to this consultation. Full details can be found at Appendix 2.

Agricultural Land Classification, Economic and Employment Considerations

The consultation report states that there is an aim to use land which is not considered by the Government to be 'Best and Most Versatile' land. The land within the red line boundary for Sunnica East is predominantly arable farmland, in regular use for the production of a variety of crops. It is expected that the EIA will include an Agricultural Land Classification assessment together with details of current and historic use of the land and likely impacts on food production in the area.

The removal of land from agricultural use will directly impact local employment and the effects of this should be also fully assessed.

Bay Farm Anaerobic Digester is located adjacent to the site boundary for Sunnica East. The land surrounding the plant is a source of sugar beet and maize feedstock and a planning condition was imposed on the planning permission for the plant (DC/15/2109/FUL) requiring feedstock to only be sourced from certain areas. A copy of the plan referred to within the planning condition is attached as Appendix 3. The areas denoted for Sunnica East and Sunnica West includes large swathes of the land that is expected to generate the feedstock for the plant. This conflict needs to be considered and it is recommended that Sunnica undertakes consultation with the operator of the plant.

Impact on future growth and employment opportunities in West Suffolk

An Employment Land Review (October 2016), produced to support the emerging Forest Heath Local Plan which is currently at an advanced stage in the planning process, recognises that a wide range of employment sites in the area rely on their proximity to the A11 corridor (and connected A14 Newmarket Bypass) for strategic road access, providing a route down to London in the South and Norwich in the East. It is a long-term aspiration of West Suffolk and adjoining authorities to achieve employment growth in this location.

In light of the above, consideration should be given whether Sunnica East would prejudice the council's long-term cross boundary aspirations for employment growth along the A11 corridor through the review of its Local Plan.

Transport strategy

In Transport terms very little detail is provided in the consultation material. We would welcome more information on the impacts of traffic on the roads and Public Rights of Way (PRoW) maintained by Suffolk County Council.

While welcoming undergrounding of cables we note that these will cross a number of public highways and PRoW. As the Local Highway Authority (LHA) we would expect to approval of the technical aspects of this and any access road cross overs or access points for construction and maintenance

As LHA we would expect to see a detailed Transport Assessment and Construction Traffic Management Plan to support any application.

One of our main concerns is the quantity and routing of traffic during construction. A specific concern is how any large vehicles to/from Ipswich and Felixstowe via the A14 will access the sites. As it is not possible to access the northbound A11 at the A11/A14 Junction 38 interchange traffic has three options:

- Routing cross country via Tuddenham or Cavenham,
- Travelling to the A14/A142 Junction 37 at Newmarket and turning around to use the eastbound slip from the A14 to the A11 at Junction 38,
- Leaving the A14 at Junction 43 at Bury St Edmunds and travelling via the A134 to Thetford and joining the A11 there.

The first option is not acceptable to the LHA while the others present their own difficulties. The nature, volume and routing of Abnormal Invisibile Loads (AILs) also concerns the authority and no details are provided. While infrequent movement of transformers from Ipswich Docks to the Burwell Sub Station has an impact on road users along the A14 corridor and the cable network supporting this scheme requires cable drums and drilling equipment, both delivered and removed as AILs.

Any PRoW within or adjacent to the sites and cable corridor must to be retained both during and after construction, Temporary closures will only be accepted when other options have been exhausted.

Future growth in and around Mildenhall – highways issues

The United States Visiting Forces in Europe (USVF) have set out their intention to withdraw from RAF Mildenhall by 2024 at the earliest. The MoD has identified that part of the site should be

released for housing, and the council is committed to reviewing this issue as part of a new West Suffolk Local Plan, the preparation of which has recently commenced.

A cumulative impact transport study (August 2016) produced by AECOM for the Forest Heath Plan has identified highways constraints at key junctions within Mildenhall which will be difficult to mitigate and states that the potential for a relief road should be explored.

Given the nature conservation constraints to the east of Mildenhall, it is likely that any future relief road is likely to be located to the west of Mildenhall and south of Worlington, with the potential to link through to the A11 at Red Lodge. In light of this, it would be appropriate to give consideration to whether the Sunnica East proposals would prejudice both the bringing forward Mildenhall USAF base, and additional development in Mildenhall and the surrounding area, through the review of the West Suffolk Local Plan.

Cambridge and Peterborough Combined Authority are developing a Cambridge Autonomous Metro (CAM) mass rapid transit network which will include regional connections to service

locations with significant planned or potential growth including Mildenhall. The [Strategic Outline Business Case](#) commissioned by the Combined Authority states an ambition for a Newmarket Road Park and Ride to Mildenhall route (30km) as one of the outer corridor routes with an indicative delivery date of 2028. These metro corridors would serve existing towns that have the potential for significant growth, and can potentially support the development of new settlements. The Sunnica development could impact on proposed route alignments for the CAM route to Mildenhall, therefore the Cambridgeshire and Peterborough Combined Authority should be consulted as key stakeholder.

Community engagement with design details

The DCO application should propose a model to use the discharge of requirements process to ensure community engagement in the detailed design of specific aspects of the development relating to design and landscaping. This should include a process of seeking community input into design details at an early stage before making applications to discharge, and then a process of public consultation and feedback by the relevant discharging authority after application.

Pre-application engagement could take inspiration from the Enquiry by Design (EbD) model, which is used by the Princes Foundation for the Built Environment for proposals for housing development. Involving the local community at an early stage in the design process can result in increased community buy-in for a proposal and improves the quality of final outcomes.

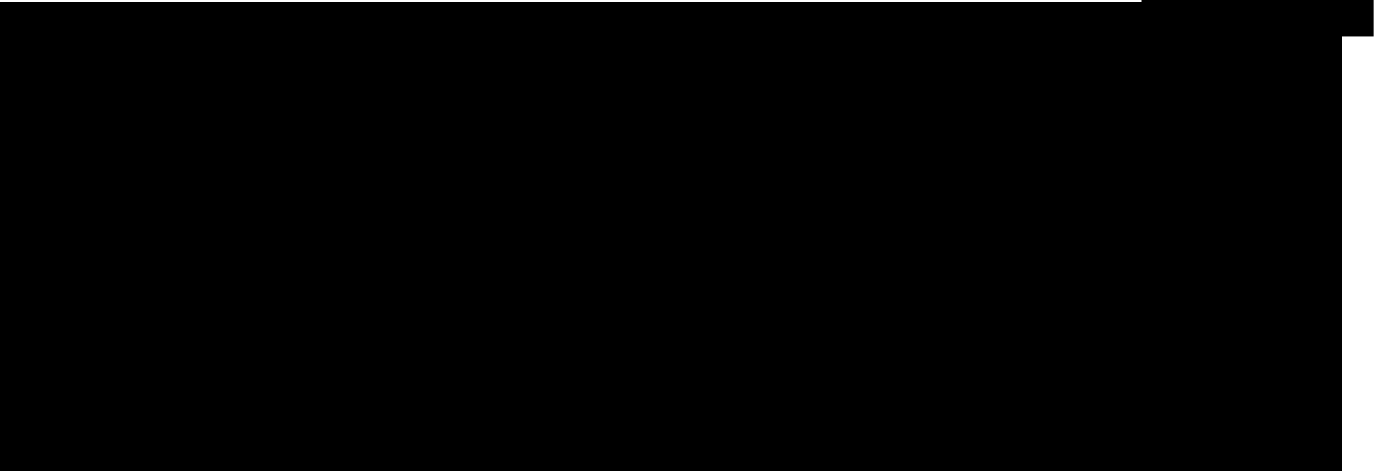
Conclusion

The scale and nature of this proposal are unprecedented in the UK; if approved it would be this country's largest solar farm. It will require a bespoke approach on the part of the promoter and the local planning authorities. The sheer extent of the proposal means that it has potential to make a significant contribution to meeting the need to reach net zero carbon emissions by 2050 and to addressing the climate emergency.

But the large scale also means that the project will have significant impacts on the local environment and communities, both during construction and operation, that must be addressed. In order for this impact to be acceptable the project will need to be exemplary in design and execution to minimise its impacts on the local community and the quality and character of the place.

The local authorities encourage the applicant to consider further interim consultation with communities after reviewing the responses to this consultation in order to address emerging concerns.

The scale of the scheme is so large that even with the best mitigation proposals it is very likely that there will be significant residual impacts. The local authorities will therefore expect these to be addressed with a robust and effective s106 agreement alongside a community benefit scheme.



A.1.1.20 Suffolk Chamber of Commerce

RTRB-LUUJ-AGBY
C/O Newgate Communications
50 Basinghall Street
London
EC2V 5DE

By email to: info@sunnica.co.uk

8 July 2019

Dear Sir/Madam,

Non-statutory consultation response

Suffolk Chamber of Commerce welcomes the opportunity to comment on Sunnica's initial proposals for the Sunnica Energy Farm in West Suffolk/Cambridgeshire. As a county at the forefront of clean energy, and with a Local Industrial Strategy currently being developed which focuses on clean-energy, Sunnica's plans will help the Eastern Region continue to be a world-leader in clean energy, whilst meeting the UK's net-zero emissions target for 2050.

As the key business organisation in the county, Suffolk Chamber of Commerce is pleased to see some initial proposals being brought forward by Sunnica, and, although we appreciate that this is a non-statutory consultation, we look forward to seeing more in-depth proposals and statistics outlining the economic and energy benefits of the Sunnica project alongside local employment figures and how the project will be delivered. Furthermore, we hope to see Sunnica employ a number of local people on the project and support skills locally by providing training and upskilling opportunities, potentially in the form of apprenticeships or the hiring of local skilled and unskilled workers during the construction and legacy phases. Moreover, we are particularly interested in how Sunnica will deliver the project and whether they will be using local businesses in the supply chain. As a chamber, we have vast experience of running supply-chains for large energy projects as we are currently doing with EDF. Going forward, we would be keen to discuss and work with Project Manager, Luke Murray about how Suffolk Chamber of Commerce can work with Sunnica to ensure local businesses benefit from the project.

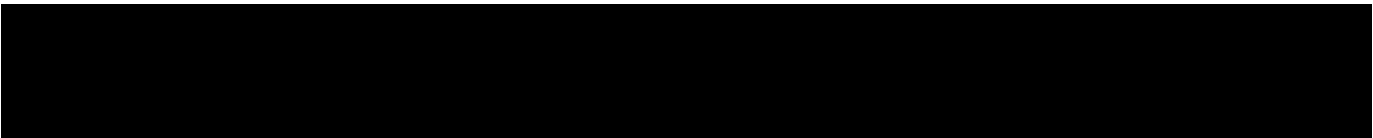
Despite the plans being at an early stage, Suffolk Chamber of Commerce would welcome further information on the traffic and access arrangements for the site during the construction phase. At present, Suffolk Chamber of Commerce is running a high-profile campaign alongside our public partners to lobby the Department for Transport to invest in the A14 which hampers economic growth regionally due to congestion and delays. As part of this, there are seven key pinch points, two of which are at Newmarket, J37 (Exning / A142) and J38 (A14 / A11 North). With the largest solar farm in the UK being built nearby, it is likely that construction traffic would worsen the current situation and add to the delays on the A14 especially at those key junctions mentioned. Further information on how the project would impact the A14 and how you would mitigate this is therefore required. Again, we would be happy to meet with Project Manager, Luke Murray to discuss the project and its impact on the A14.



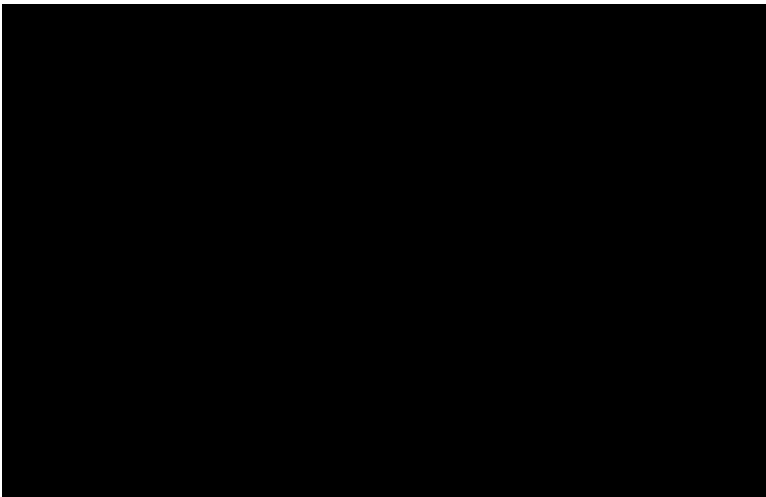
Finally, Suffolk as a whole is a popular tourist destination. Newmarket, Bury and the Forest Heath area are popular destinations for those visiting our county. As a result, Sunnica Energy Farm must not only protect the cultural and environmental assets within this part of Suffolk but actively support and assist local charities and environmental groups in their mission to improve, sustain and promote this part of Suffolk. Clean energy is most welcome in Suffolk but not at the expense of our local assets and our green environment.

To summarise, Suffolk Chamber of Commerce warmly welcomes further green energy in the county, especially that which boosts economic growth and works in conjunction with our Local Industrial Strategy. Nevertheless, we expect to see further information on the economic benefits of the project, how it will employ and use local skilled and unskilled workers, how the project will work with local businesses/suppliers, and the impact on our already congested roads.

We look forward to receive more detailed information at a later date, and we would be more than happy to meet with the Project Manager, Luke Murray to discuss the above and how we can work together.



Yours faithfully,



A.1.1.21 Suffolk Preservation Society

26 July 2019

info@sunnica.co.uk

Sunnica Ltd
FREEPOST reference
RTRB-LUJ-AGBY
C/o Newgate Communications
50 Basinghall Street
London, EC2V 5DE

Dear Sirs,

Sunnica East and West 500MW Solar Energy Farm - Non-statutory public consultation response

I am writing on behalf of the Suffolk Preservation Society (SPS) regarding your proposals for the Sunnica project currently out to public consultation. 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 Campaign to Protect Rural England (CPRE) 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.

Whilst acknowledging the imperative for the transition to a low carbon economy and the need to provide renewable energy, it must be balanced with the environmental considerations. Early engagement with the local community and wider organisations is welcomed and can be beneficial in the long run, but we are very disappointed with the extremely low level of detail currently provided in terms of the projects’ design, scale and resulting visual impacts. It is therefore difficult for SPS to provide a detailed response to the project until significantly more information is made available. The following comments are therefore made in general terms, but where specific sites or areas are referred to, these have been restricted to the impact on Suffolk. Moreover, whilst the proposals will impact three county wildlife sites, we defer to the Suffolk Wildlife Trust and Natural England on points of ecology.

In summary SPS objects to the scheme on the following grounds:

- Failure to comply with national and local planning policy
- Failure to select a sequentially preferable, previously developed brownfield site in favour of a greenfield site
- Significant harm to the pattern of historic landscape

SPS registered charity no 1154806 Representing CPRE in Suffolk



- Significant harmful visual impacts resulting from the scale, height, orientation and layout
- Inadequate information regarding the layout/distribution of panels and supporting infrastructure including batteries and inverters
- Impact on heritage assets including the setting of the Freckenham Conservation Area, Bowl Barrow at Chalk Hill and listed buildings in proximity to the Sunnica East boundary
- Impact upon the public right of way network
- Impact upon residential amenity and visual amenity

National and local policy

The relevant planning policy document NPS EN-1 supports the production of low carbon energy, yet there is no specific national policy statement relating to the commercial scale energy generation from solar. However, relevant planning advice on large scale solar development can be found within the NPPF. The Framework makes clear that commercial scale proposals should be Development Plan led and allocated through the planning system (para. 149), alternatively they should be community led (para. 152). In view of the magnitude of likely harmful visual effects it is unclear how the proposals could be well received by the communities who will be expected to host this development.

Furthermore, Policy DM8: Low and Zero Carbon Energy Generation of the West Suffolk Joint Development Management Policies Document (2015) requires proposals to be designed and sited to minimise intrusion and visual impact, include mitigation measures to address the visual impact and include an appraisal of the impact on the environment of the proposal either in isolation or cumulatively with any other similar developments. The policy concludes that in nature conservation sites, or within or visible from Conservation Areas or other heritage assets proposals must demonstrate that they represent the highest standards of siting and design appropriate to the location.

Sequential site selection

We strongly object to the selection of unallocated greenfield land over brownfield sites for energy production. We call for the site selection process to clearly and openly demonstrate that brownfield sites have been identified and fully explain the reasons for not pursuing this as the preferred option. 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.

Impact on historic landscape

This is an historic landscape of Rolling Estate Chalklands typology. The visual experience is 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 Inclosure in the C18th. In particular the historic green lane that links Badlingham Manor to the village of Worlingworth is a significant historic landscape feature that must be protected and retained as a public right of way. 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 proposed installation would fundamentally alter the landscape character spanning and encroaching upon a number of rural settlements. Important landscape features including tree belts, hedgerows, footpaths must be protected and mitigation of visual impacts

embedded within the scheme.

Industrialisation of landscape

The proposed solar installation would be a highly visible industrialisation of a large swathe of landscape on an unprecedented scale. Although no details are given on the design and layout of the solar panels, the visual impact of the scheme will be substantial. The height of the panels may exceed 2.5m and we note from the scoping report that an East West orientation option for the panels is being considered. If placed on this alignment it will result in a highly intrusive feature that give rise to an unrelieved coverage of the countryside due to the close proximity of the panels and limited green space between them. Whilst we await visualisations and the conclusions of a landscape and visual impact assessment to fully assess the implications of this approach, we consider that this option could have a particularly industrializing visual impact. We call for a layout that minimises the visual impacts and maximises green corridors between the arrays for both visual impact and biodiversity purposes.

Supporting Infrastructure

We are very disappointed by the lack of clarity regarding the proposals relating to the proposed batteries, with no information around the concentrated or dispersed distribution. This element will be highly prominent, standing up to 5m in height with inverters and large industrial structures, including stacked shipping containers repeating across the landscape with no attempts made to screen. It is necessary to have both scenarios fully designed before seeking views from the public about the implications of each alternative. In the absence of any thorough assessment of the number of batteries and how they might be distributed across the site and mitigated, the purpose of the consultation is severely undermined.

Impact on heritage assets

We consider that there is a significant risk of harm to nationally designated heritage assets. In particular we are concerned about the potential harmful impact on the setting of Freckenham Conservation Area. There are concentrations of listed buildings in the historic villages of Freckenham and Worlington that may be impacted by the proposals. We also note that Badlingham Manor, a listed building, is in close proximity to the south western boundary of Sunnica East and consider that the proposals may result in significant harm to its setting. On the eastern edge of the site, 380m north west of Chalkhill Cottages is the bowl barrow on Chalk Hill, a scheduled ancient monument. This well-known landmark is the only visible survivor of an immediate cluster of four barrows. There is no information supplied on how the proposals take into account the setting of these assets. A heritage assessment carried out using the methodology set out by Historic England's Historic Environment Good Practice Advice in Planning: 3 (2nd Edition) (2017) is required to fully assess these impacts. In the absence of this fundamental level of information the Society considers it virtually impossible to make meaningful comments other than to call for any harm to heritage assets to be minimised and mitigated.

Visual and residential amenity

We are concerned that the area enclosed by the red line area includes an extensive footpath network as well as minor roads. No detail is available on the siting and layout of the solar panels or any screening. However, 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. Moreover the experience of the

landscape for those travelling along the roads will be significantly changed, particularly where the solar panels will be on both sides of the highway. Any further public consultation must include comprehensive level of detail regarding the setback buffer areas and hedging referenced within the consultation documentation.

We have serious concerns that the red line is drawn very close to the built up edges of Freckenham and Worlington. Whilst the consultation material states that there may be some set back buffer areas in some areas, no detail is given and therefore the impact of the development on residential amenity in these areas is entirely unclear. In the absence of this fundamental level of information the Society considers it virtually impossible to make meaningful comments but call for a scheme that prioritises the residential amenity of local residents.

We trust that you will find these preliminary comments helpful in developing a less damaging and more sensitive scheme that satisfactorily reconciles the needs of the communities hosting this proposal while meeting the challenge of providing renewable energy as part of the transition to a low carbon economy.



Ccs:

Chairman Suffolk Preservation Society, Andrew Fane

Rt Hon. Mat Hancock MP

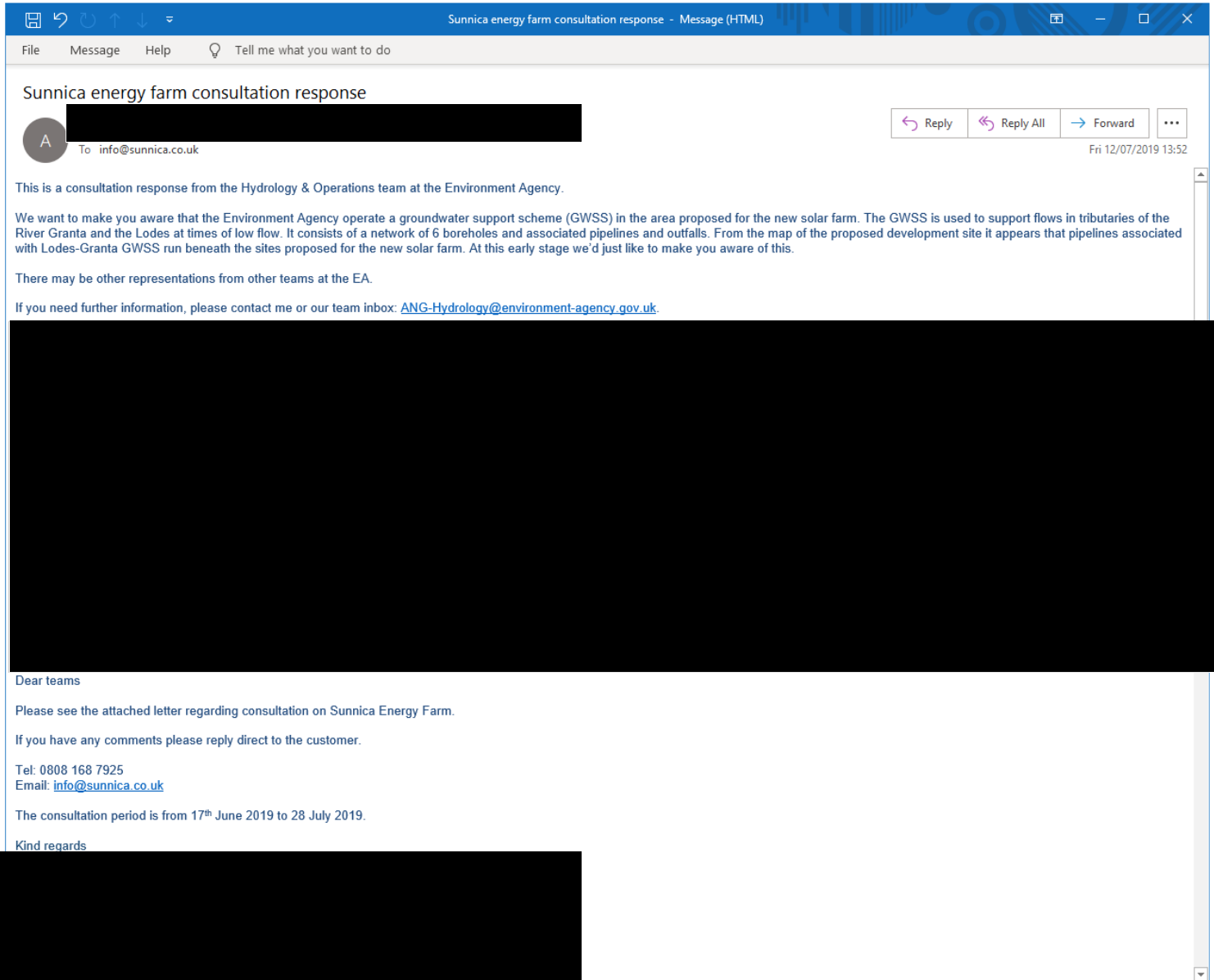
Suffolk County Councillors

Phil Watson - Suffolk County Council Landscape Officer Portfolio Holder for Planning, WDC

Boyd Nicholas, Principal Planner (Conservation and Design), West Suffolk CPRE Cambridgeshire

Parish Councils – Worlington, Freckenham, Isleham, West Row

A.1.1.22 Hydrology and Operations Team (Environment Agency)



Sunnica energy farm consultation response - Message (HTML)

File Message Help Tell me what you want to do

Sunnica energy farm consultation response

To info@sunnica.co.uk

Reply Reply All Forward

Fri 12/07/2019 13:52

This is a consultation response from the Hydrology & Operations team at the Environment Agency.

We want to make you aware that the Environment Agency operate a groundwater support scheme (GWSS) in the area proposed for the new solar farm. The GWSS is used to support flows in tributaries of the River Granta and the Lodes at times of low flow. It consists of a network of 6 boreholes and associated pipelines and outfalls. From the map of the proposed development site it appears that pipelines associated with Lodes-Granta GWSS run beneath the sites proposed for the new solar farm. At this early stage we'd just like to make you aware of this.

There may be other representations from other teams at the EA.

If you need further information, please contact me or our team inbox: ANG-Hydrology@environment-agency.gov.uk

Dear teams

Please see the attached letter regarding consultation on Sunnica Energy Farm.

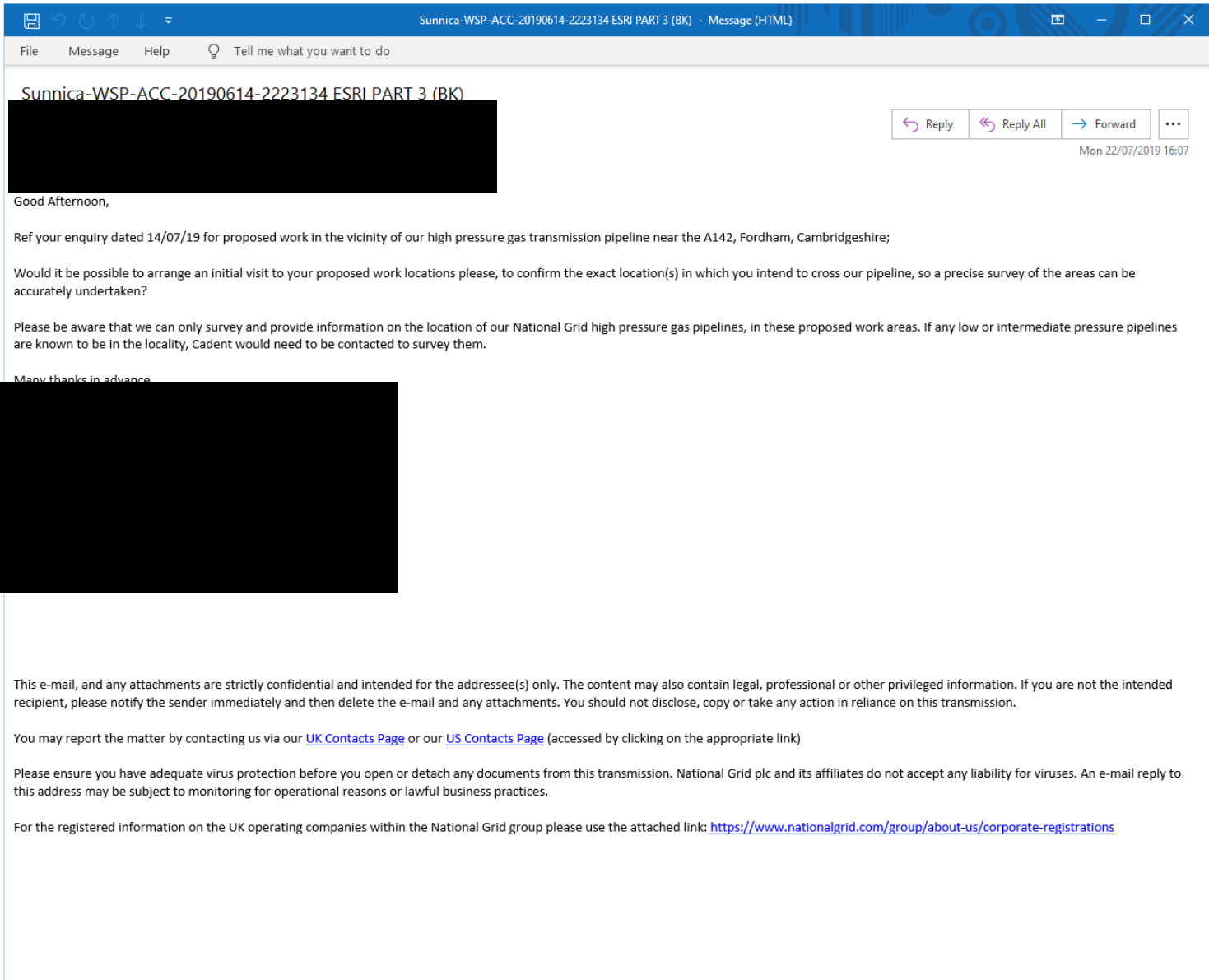
If you have any comments please reply direct to the customer.

Tel: 0808 168 7925
Email: info@sunnica.co.uk

The consultation period is from 17th June 2019 to 28 July 2019.

Kind regards

A.1.1.23 National Grid Gas Transmission



Sunnica-WSP-ACC-20190614-2223134 ESRI PART 3 (BK)

Good Afternoon,

Ref your enquiry dated 14/07/19 for proposed work in the vicinity of our high pressure gas transmission pipeline near the A142, Fordham, Cambridgeshire;

Would it be possible to arrange an initial visit to your proposed work locations please, to confirm the exact location(s) in which you intend to cross our pipeline, so a precise survey of the areas can be accurately undertaken?

Please be aware that we can only survey and provide information on the location of our National Grid high pressure gas pipelines, in these proposed work areas. If any low or intermediate pressure pipelines are known to be in the locality, Cadent would need to be contacted to survey them.

Many thanks in advance

This e-mail, and any attachments are strictly confidential and intended for the addressee(s) only. The content may also contain legal, professional or other privileged information. If you are not the intended recipient, please notify the sender immediately and then delete the e-mail and any attachments. You should not disclose, copy or take any action in reliance on this transmission.

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For the registered information on the UK operating companies within the National Grid group please use the attached link: <https://www.nationalgrid.com/group/about-us/corporate-registrations>

A.1.1.24 Swaffham Internal Drainage Board

SWAFFHAM INTERNAL DRAINAGE BOARD

ENGINEER: ANDREW NEWTON
CLERK: JEAN HEADING

DRAINAGE OFFICE
MAIN STREET
PRICKWILLOW
CAMBS. CB7 4UN
TEL: ELY (01353) 688296
FAX: (01353) 688561

Sunnica
RTRB-LUUI-AGBY
c/o Newgate Communications FREEPOST
50 Basinghall Street London
EC2V 5DE

Our ref: **AN/tr** Your ref:

27th June 2019

Dear Sirs

Sunnica Energy Farm

Thank you for consulting the Board on your project.

The three energy farm sites are outside of an Internal Drainage District. However, the cable route to the sub-station in Burwell does pass through the Board's District.

The Board has no objections to the scheme in principle, but any crossing of a watercourse within our District will require the prior consent of the Board.

A plan of the Board's District can be found on our website at www.elydrainageboards.co.uk.

Please contact us if you require any further information.

A.1.1.25 Ramblers, Newmarket and District Group

Luke Murray

Sunnica Ltd

26th July 2019

Dear Mr Murray

Sunnica Energy Farm.

I refer to your letter dated 6th June 2019, addressed to me, on behalf of Newmarket Ramblers, (the Newmarket and District Group of the Ramblers Association).

My Group is responsible for monitoring rights of way matters, including planning applications 'affecting a public right of way'. In this case, the role includes not only the West Suffolk parishes of Freckenham, Worlington and Barton Mills, but also the East Cambridgeshire parishes of Chippenham and Snailwell, which feature in your scheme, but not Burwell.

In truth, there are very few rights of way, actually, within the areas under consideration, and none whatsoever within Sunnica West Sites A & B. As you have noted, though, Snailwell bridleway no 5 runs, literally, over the hedge, from West Site A and special treatment will be required, should the scheme proceed, so as not to spoil the enjoyment of users, including 'higher-seated' riders. It is noted that rights of way will be crossed by the link between West Sites A & B and between West Site B and Burwell and long term closures will not be welcome.

Moving on, now, to Sunnica East, where there are rather more rights of way but, generally, field-edge, and 'over the hedge', with the exception of Freckenham bridleway nos 1 and 2, requiring a wide route. The 'green lane', (6006), on SCC records, and as an 'other route with public access' on the OS map, running from Rectory Farm, Freckenham, to Worlington, will also require special treatment. It has to be said, at this stage that, in both Freckenham and Worlington, the 'red line' is rather too close to existing dwellings for comfort.

We recognise the need to reduce the use of fossil fuels and to develop alternative ways of meeting the increasing demand of electricity, but this should, surely, not be at the expense of the production of food. It has been cited that the land intended for this project is not of a particularly high grade, something that the laymen amongst us are not qualified to challenge. Nevertheless, a whistle-stop tour, a few days ago, revealed that all the fields within the sites, visible from the road, were in crop, mainly with cereals and sugar beet; in fact, some of the former have now been harvested.

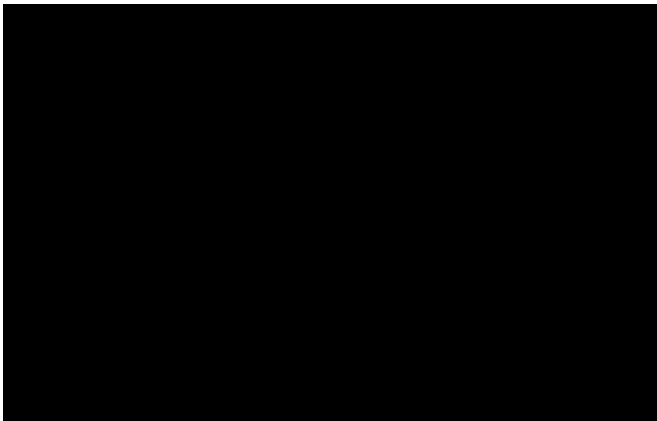
In recent years, the reputation of Newmarket as 'the home of horse racing' has resulted in an ongoing increase in the number of stud farms and private training facilities in the area surrounding the town, a policy that appears to be encouraged by the district councils in both counties. This has, of course, resulted in a significant reduction

of the acreage of land in arable use, and the wisdom of permitting the loss of further substantial areas to accommodate Sunnica Energy Farm, even for an alleged forty year period, must be questioned.

The question of viability comes to mind, following the arrival of some guidance notes indicating that “arrays’ should be installed as close to the point of use as possible’, say on the roofs of buildings. Small schemes, of course, but how different from your proposal, the eastern extremity of which, near the Golf Club at Worlington, is about 11 miles from Burwell, tolerably following your routes; and rather further than the existing overhead route from Burwell to Cambridge!

Should the provision of additional rights of way arise in the future, we would be pleased to be a party to any discussions, along with the appropriate County Council Rights of Way Officer.

It is hoped that you will find these comments to be useful, at this non-statutory stage



A.1.1.26 Moulton Parish Council

Moulton Parish Council is firmly behind the Community Action Group - Say No To Sunnica. Government guidelines recommend that renewable energy schemes of this magnitude should be located on brownfield sites. Productive agricultural land is being earmarked for an industrial scale of development. The sheer scale of the development will totally change the character and setting of villages, with unknown negative effects on wildlife and human health as well as concerns for future generations having to decommission the panels.