

Submissions Received During Acceptance Period

EN010106 - Sunnica Energy Farm

Number	Name	Date
1	Alan B Smith	02 November 2021
2	Snailwell Parish Council	17 November 2021
3	Freckenham Parish Council	19 November 2021
4	Nick Harvey	19 November 2021
5	Isleham Parish Council	22 November 2021
6	Chippenham Parish Council	22 November 2021
7	John Leitch	23 November 2021
8	Nick Wright	29 November 2021
9	Worlington Parish Council	29 November 2021
10	The Ark Church	30 November 2021
11	Worlington Parish Council	02 December 2021
12	Catherine Judkins	02 December 2021
13	Catherine Judkins (on behalf of the Say No to Sunnica Community Action Group)	03 December 2021
14	Lucy Frazer MP and Matt Hancock MP	03 December 2021
15	Mr and Mrs MSP Stone	05 December 2021
16	Daniel Smith	05 December 2021
17	Jan Smith	05 December 2021

From: [REDACTED]
To: [Sunnica Energy Farm](#)
Cc: enquiries@beis.gov.uk
Subject: Sunnica Inadequency of consultation
Date: 02 November 2021 10:44:49
Attachments: [INADEQUENCY OF CONSULTATION BY SUNNICA LTD REPORT DATED NOV 4TH 2021.docx](#)

Dear Sirs

Please see attached report sent to Julie Barrow at West Suffolk Council today.

Kindly acknowledge receipt.

Yours faithfully

Alan B Smith Worlington.

Sent from [Mail](#) for Windows

INADEQUACY OF CONSULTATION BY SUNNICA LTD REPORT DATED NOV 2nd 2021.

TO Julie Barrow Principal Planning Officer Planning Development West Suffolk.

Copies to

Brian Harvey District Councillor.

Lance Stanbury County Councillor

Matthew Hancock MP.

Planning Inspectorate and BEIS for attention of Chris Mulvee

FROM Mr Alan Smith on behalf of self and wife, [REDACTED], address [REDACTED]
[REDACTED] (email [REDACTED])

Under the Data protection Act we authorise this report being sent to the Planning Inspectorate and/or BEIS with accompanying documents from the Council.

Introduction.

Sunnica Ltd had a legal duty to carry out the consultation under Section 42 and 47 of the Planning Act 2008.

The directors of Sunnica Ltd had a duty to ensure the Consultation was conducted in accordance with the Statement Of Community Consultation (SOCC)

It is felt that both have failed in their duties and I will produce facts to support that statement.

Sunnica Energy Farm Non-statutory public consultation.

This was introduced to the residents of Worlington (Sunnica East) on the 21st June 2019 between 15.30 and 19.30pm at Worlington Village Hall. The directors of Sunnica Ltd were present together with staff from their agents AECOM.

There has been no further personal meetings by the 2 directors of Sunnica Ltd, Mr Hazell and Mr Murray, since that date and the date of this report with any local residents, for over 2 years.

What was put forward as proposals actually constituted a moveable red-edged application site. It was not appropriate to hide behind the "Rochdale Envelope" in order to repeatedly and significantly amend site boundaries. This action by Sunnica has continued right up to the submission of the DCO. At this early stage it was not clear as to how the site had been selected as it is clearly an important historic landscape well known as The Brecklands. A lot of play had been made on the quality of the agricultural land which is not set-aside but is intensively cropped for onions, potatoes, sugarbeet, parsnips etc and has also provided land for pigs, chickens, sheep and horses.

The true level of solar panels had not been detailed so nobody could understand the number of panels required versus the land required for development. The type, height and orientation of the panels was also in question, with heights of 3.75 m suggested. As to battery storage units there was contradictory evidence as to their true height, with Sunnica documents referring to heights of circa 10m, 5m and 2.5m. There was scant information provided regarding these issues and the consultation team were unable to provide it. [REDACTED] approach had made a major impact on how the scheme was regarded.

Many local residents made the point after that meeting that it would be advisable for the directors of Sunnica Ltd to try to work with our local communities rather than continue with the [REDACTED] advice that had been provided to date.

Sadly that has never happened only that the position has got worse as will be outlined further in this report.

Campaign Group

Following on from the June consultation meeting in July 2019 a campaign group was formed "saynotosunnica" covering the 4 villages then affected by the proposed Sunnica development. The aim of this was to challenge Sunnica on its plans and to share information with local residents. Meetings were held at the Golden Boar Freckenham on the 5th Aug, 2nd Sept, 7th Oct and the 4th Nov 2019. On each occasion up to 60 people attended with standing room only.

The campaign group has continued to function throughout the pandemic using IT facilities but has been severely disadvantaged by the lack of public meetings.

In early 2020 the country was struck with the Covid pandemic and it was not possible to organise a public meeting to discuss Sunnica between 4th November 2019 and the 15th October 2021, a period of almost 2 years.

The meeting on the 15th October 2021 for a question and answer session was organised by Lucy Frazer and Matt Hancock our 2 local MPs in the Isleham village hall where up to 250 local residents attended.

The invitation by the 2 MPs for the directors of Sunnica to attend was turned down by them. A further demonstration of their [REDACTED].

Statutory Consultation.

This was held between 22nd September- 18th December 2020. This was carried out, due to the Covid pandemic, by way of a consultation booklet and webinars. There was no attendance at any event by the directors of Sunnica Ltd who saw this as an opportunity to distance themselves from residents and provide important answers to the many questions they were being asked.

Longfield Solar Farm by Longfield Solar Energy Farm Ltd.

This is a NSIP project at Boreham/Hatfield Peverell Essex with the planning inspectorate and their consultation finished on the 13th July 2021.

Matthew Justin Hazell, the principal director of Sunnica Ltd, is also a director of Longfield Solar Energy Farm Ltd.

It is noted from the Longfield Campaign group web site that he organised public ticketed exhibitions on the 8th, 9th and 12th June 2021 at Terling and Hatfield Peverel village halls.

The Timeline of UK Coronavirus lockdowns March 2020 to March 2021 shows Mr Hazell could have organised the same Public Ticketed Exhibitions during the Sunnica Ltd Consultation between the dates of 22nd September and the 5th November 2020, the date when the second national lockdown commenced.

This raises the question why were the residents affected by the Sunnica proposal not given the same degree of consultation opportunity as those in the Longfield area.

Sunnica Energy Farm Consultation Booklet 22nd September-2 December 2020 extended to 18th Dec 2020.

On the 2nd November 2020 I was forced to write a complaint report on the way the consultation was being conducted after referring the matter to the Planning Inspectorate. They advised me to write to the 4 Councils involved with Sunnica which I did with copies being sent to the 2 MPs the SOS and The Planning Inspectorate.

Webinars.

These were discriminatory against the many senior citizens in villages such as Worlington 26.8%, Freckenham 24.1%, Snailwell 20.1% and Chippenham 13.8% (Source UK office for National Statistics as at 30th June 2020)

████████████████████████████████████████ we were unable to take part due to our very limited computer knowledge. Therefore it is only fair for me to leave it to those that could participate to put forward their comments.

Consultation Booklet

I can only describe this as “Not fit for Purpose.”

Maps included were unreadable, not to scale, boundaries could not be properly identified, road numbers could not be identified and numbered roads were not named. The word farm was inappropriate as we were dealing with an industrial complex covering 2,800 acres to include offices warehousing solar panels and 75 acres of battery storage over 3 sites. My request for a detailed map on a scale 1:25 000 was declined by Sunnica.

It would have been appropriate for the PEIR to be attached for ease of reference.

Page 8 it refers to the splitting of Sunnica East but this was only forced upon Sunnica by the withdrawal of the 800 acres of the Freckeham estate.

Page 12 “Solar PV technology”

The plan is to arrange each panel orientated to the South at a slope of between 15 and 35 degrees from the horizontal with a picture of Solar PV Modules as planned on page 12. This was in alignment with the PEIR Chapter 3. The following timeline gives a different picture.

15th July 2020 Freckenham PC Write-up from Sunnica to Parish Council Alliance briefing states The proposal is to arrange the panels facing South, in lines across fields running from East to West.

22nd Sept 2020 Consultation booklet published for start of consultation.

12th November 2020 (within consultation period) I receive a letter from Sunnica in answer to questions I raised advising me the panels will be positioned south-facing and in rows running from East to West.

The directors were aware of the East-West orientation in mid-July so the statement on page 12 and the picture plus the picture on page 20 is totally misleading to the public and will not include grassland as per page 20.

August 2021 Sunnica sent out an Update Newsletter. There is no mention in that document of a change of plan from panels facing south but in an East-West orientation.

That newsletter was sent to 11,048 addresses (confirmed by Sunnica to me 29th Sept 2021) as was the consultation brochure which means all those residents have been deliberately misled on how the landscape in the 2,800 development will change for 40 years.

Turning now to the EA report on Cleve Hill page 69 para 5.3.19 and 5.3 20 that applicant applied for East-West orientation in the knowledge that design was less efficient than a South facing arrangement. However the loss of efficiency was then offset by a higher density of solar panels.

East/West orientation is 15% less efficient than South facing. (Source Sheffield University Jamie Taylor) They also state there are problems with modelling software and the design on what's happening beneath the panels. The frames create roof-like structures that block natural light and rainwater from reaching the ground underneath. Therefore sheep cannot graze as per purely South facing. At Cleve Hill as such, Cleve Hill Solar Park Ltd had to enlist expert researchers in the UK to put together detailed environmental impact assessments analysing light and water levels, soil content and more.

There is no evidence from Sunnica that any research has been done as part of the Consultation process.

There is reference on page 69 EA report in para 5.3.20 to a scheme in the Netherlands that employed the East-West layout and a picture is available at (APP-035) plate 5.6b on the Cleve Hill planning inspectorate website under library documents. Similarly in a 300MW Cestas project in Bordeaux France that was East-West orientation and by googling this site a very clear picture is there for a 0.8 hectare of land.

Sunnica has never produced an image of an East-West orientation and their website, Environmental images, only shows the South facing design.

The public have no perception of the meaning East West design or the impact on the landscape.

I would also refer you to Solar Energy volume 209 Oct 2020 and a case study on Cleve Hill under the heading

“What shapes community acceptance of large scale solar farms. A case study of the UK's first NSIP solar farm at Cleve Hill. “

Comment here is made on the lower efficiency and higher density requirement and the fact that design has a profound adverse effect on wild life.

The public have NOT had the chance to consult on the East-West orientation. Therefore Sunnica should have provided the number of solar panels for what was described in the brochure and what they plan with the different orientation. Furthermore in studying the pictures from the Netherlands and Bordeaux and comparing with the South facing picture in the brochure it is chalk and cheese and something the communities would be reluctant to accept without consultation.

Sunnica in all my communications have refused to state the number of solar panels within the 1,770 developable area of the 2,800 acre development. However figures have been published for Cleve Hill at 884,000 for 900 acres so my estimate for Sunnica would be in the region of 1,768,000 million panels.

Pages 14 and 29 refer to battery energy storage systems known as BESS. Sunnica refuse to tell us how many battery units on each of the 3 sites. It is difficult to understand how a BESS safety management plan can be worked on recently by Sunnica and the local fire services when the facts

are unknown. Sunnica openly admits in public they are on a steep learning curve re battery technology and safety. Local fire services have no national regulations via the National Fire Chiefs Council (NFCC) for attending a BESS fire and explosion as advised to me by their [REDACTED] in 2021.

The statement on page 29 re major accidents and disasters Heading outcome and mitigation is misleading to the public to say the least. The Sunnica directors and their agents A.E.C.O.M are not aware of the academics reports on BESS fires and explosions as outlined in the Cleve Hill report and what has been commissioned by the Sunnica campaign group in 2021 and The Atkins report for Northern Ireland. It is obvious A.E.C.O.M have not researched safety problems, the risks to the public and the consequences of a major catastrophe. Their statement is unacceptable and they do not possess the technical information to make such comments. BESS are not safe.

Page 16 Grid connection The distance from the solar units to the Grid connection at Burwell is 15km. The Examiners report for Cleve Hill page 69 para 5.3.17 states 5km is the area beyond which the grid connection becomes uneconomic. So why is the development not next door to the Burwell substation where there are hundreds of acres of flat land with sparse human habitation?

Solar panels lose their efficiency over a period of 25 years. Greenwich in an article 18th December 2020 states that during the life of photovoltaic panels, a 20% decrease in power capacity might occur. Between the first 10-12 years the max decrease is 10% and 20% when reaching 25 years.

So why are Sunnica negotiating 40 year leases with landowners?

An Article published 21st October 2019 states that Smith Brothers Contracting is set to provide turnkey electrical engineering services at the planned Sunnica Energy farm. Even they say, and they state 16km of cabling, it will prove challenging. How has a contract been signed before planning consent is granted.

Another key question Sunnica refuse to answer is what is the cost?

Page 32. Decommissioning. Mentions the operating life of the scheme of at least 40 years. However this does not make sense if the efficiency of the panels as described above is 25 years. The directors need to give clarification. Furthermore if the planning consent is, on sold, as they have publicly announced, then there will be no obligation on the Sunnica directors to decommission. At the present time BEIS is holding an open consultation and EN3 will include solar PV in the future. Therefore until new Government policy is available on decommissioning it is difficult to see if bonding is appropriate. If Sunnica is to include this subject in its DCO then the cost of decommissioning must be made known and the time scale.

Alternative sites are not mentioned in the brochure and all attempts by me over the last 2 years to obtain this information together with brownfield sites from Sunnica has drawn a blank. Once again the public have a right to know this information which should not be left until the DCO is submitted.

Brownfield sites should take priority over farmland. Sunnica have taken the easy option with their plans to incorporate 2,800 acres of food producing land. Savills "current land use" document dated 17th Jan 2019 says that the agricultural area has declined by 64,000 acres per year over the last 20 years. If we add on a further 2 years and with increased building and solar installations then over 22 years a staggering 1.5 million acres of farmland has been lost.

Inside front cover About Us Lastly on the design and content of the brochure I am unhappy with the "About us" statement on the inside front cover.

It is stated that the development is a joint venture with 2 established solar developers, Tribus Energy and PS Renewables. Tribus Clean Energy 11 Ltd was incorporated in 2019 and struck off Companies House register in April 2020 Tribus Clean Energy Ltd was incorporated in Aug 2018 and shows capital in 2019 of £138. Hardly an established company and with no track record.

The other company mentioned is PS Renewables. If it is PS Renewables Ltd they refer to, then it was incorporated in November 2012 and has been dormant ever since.

Otherwise PS Renewables is a facing name for Solaer founded in Spain in 2004 and Padero Solar Ltd a small company created in 2011.

There is no evidence in Companies House records or any information provided by the directors to support their statement.

In my opinion as the statement is so short and in such small print that it constitutes "misrepresentation of fact".

The public should have been provided with profiles of the 2 directors, evidence of their involvement with Solar PV and Battery Storage Units to support their glib comment of years of experience. They should also have provided a chart of all the connected web of companies available from Companies House in relation to Sunnica Ltd. This should not be left to the DCO and funding statement stage.

Nowhere is evidence provided to support a NSIP with a capital cost on which they remain silent but based on Cleve Hill 900 acres cost at £450million for the Sunnica proposal is likely to be in my estimate up to £1.5billion.

Compulsory purchase

There is no mention in the Scoping Opinion report by the planning Inspectorate case No Ref EN10106 April 2019 or in the Consultation booklet, made available to the public of any plans for Sunnica Ltd or its directors to compulsory purchase.

This is also confirmed in a letter to me dated 31st March 2021 from West Suffolk Council in which it states Sunnica have not yet advised West Suffolk Council they will be seeking authorisation for compulsory purchase in their application.

Following this letter the Planning Inspectorate then wrote to me with the very detailed rules and regulations on Compulsory Purchase and that it is only the SOS who can grant permission.

In recent months I have had correspondence with BEIS on the Sunnica consultation and I have a letter from them dated 13th October 2021 in which they state under section 122 of the planning Act 2008 compulsory acquisition may only be authorised if

- The land is required for the development to which the consent relates; or
- It is required to facilitate or is incidental to that development; or
- It is replacement land which is to be given in exchange for the Order land under sections 131 or 132 of the planning Act 2008; and
- There is a compelling case in the public interest.

In connection with this:

- The land required to be taken must be no more than is reasonably required and be proportionate;
- There must be a need for the project to be carried out;
- All reasonable alternatives to compulsory acquisition have been explored;
- The applicant has a clear idea of how it intends to use the land and can demonstrate that funds are available to pay for the acquisition; and
- They are satisfied that the purposes stated for the acquisition are legitimate and sufficient to justify the interference with human rights of those affected.

Since Sunnica advertised its plan in 2019 there have been instances within the 2,800 acres of The Company and/or its directors using threatening tactics to landowners and owners of residential properties to exercise their right to compulsorily purchase.

Evidence can be submitted as follow.

In 2019 Mr Tuke the landowner at Freckenham withdrew his 800 acres from the scheme. There is a post on the Freckenham parish council website in 2019 headed

Withdrawal of the Freckenham Estate from the Sunnica scheme. This should be accessed to support the evidence and the remarks made by Mr Tuke.

Similarly in 2020 La Hoque farm at Chippenham had the same problem. There is a posting on the Chippenham website and facebook page via the PC headed

Sunnica compulsory purchase of land at La Hoque farm. Again this should be accessed to support the reference from the 2 families that own La Hoque.

In 2021 there has been talk of 81 private residential properties being contacted by Sunnica re road widening. Unfortunately due to the secret tactics used by Sunnica I have no further evidence of where this has happened, who has been affected and the content of the letter.

Surely this is evidence of individuals having interference with their human rights.

The letter I refer to from BEIS 13th Oct concludes by saying I should get professional advice regarding the compulsory purchase matters I have mentioned above.

I think this is the duty of the 4 Councils to raise in their paper of Inadequate Consultation to the Planning Inspectorate.

Conclusion

There is sufficient evidence in this report that Sunnica Ltd and the Directors Mr Hazell and Mr Murray have demonstrated an inability to be transparent with local residents and to properly inform in a professional way during their consultations.

Any NSIP requires top professional presentation and this is sadly lacking from their very amateur and flawed application.

Their public statement that their intention is to on-sell the planning consent if granted is evidence more of financial gain than any firm commitment to green energy and the environment.

There is no justification in view of the inadequacy of consultation for this application to be approved by BEIS.

From: snailwellparishcouncil@hotmail.com
To: [Sunnica Energy Farm](#)
Subject: Snailwell Parish Council Response
Date: 17 November 2021 15:45:24
Attachments: [Sunnica Covering Letter.pdf](#)
[Inadequacy of consultation bullets.pdf](#)

Dear Sir/Madam,

Please see the attached documents from Snailwell Parish Council which relate to the adequacy of consultation for the Sunnica Solar Farm Development.

The Council formally request that these comments are taken into account when you consider this proposal.

Kind Regards



Locum Clerk to Snailwell Parish Council



Snailwell Parish Council

Laura Yates (Clerk to the Parish Council)

COUNCIL OFFICE: 38 LESTER PIGGOTT WAY, NEWMARKET, SUFFOLK, CB8 0BJ

EMAIL: snailwellparishcouncil@hotmail.com

CONTACT PHONE: [REDACTED]

DATED: 27th day of JULY 2021

- East Cambridgeshire District Council
Planning Officer

Andrew.phillips@eastcambs.gov.uk

- Cambridgeshire County Council
Strategic Planning Team

Daniel.snowdon@cambridgeshire.gov.uk

- Mayor for Cambridgeshire & Peterborough

Nik.johnson@cambridgeshirepeterborough-ca.gov.uk

Dear Council Planning Officers

Sunnica Statutory Consultation

Snailwell Parish Council would like to inform you that they still find that Sunnica's Statutory Consultation was inadequate and requests that this letter and accompanying documents are shared with the Planning Inspectorate as part of the Council's "Adequacy of Consultation" representation during the Acceptance phase. This request is per paragraph 7.1 of the Planning Inspectorate's Advice Note 2 "The role of local authorities in the development consent process".

Snailwell Parish Council is a member of the Parish Councils Alliance - Sunnica Group and endorses the list of inadequacies found by this group. A copy of the list is attached.

Finally, Snailwell Parish Council carried out a household survey within Snailwell on the Sunnica Statutory Consultation, using four standard questions supplied by the Parish Councils Alliance, Sunnica Group. The survey results and comments raised are attached.

Yours faithfully

Laura Yates

(Laura Yates)
Clerk to Snailwell Parish Council

Inadequacy of Consultation – bullets

Sunnica's 'virtual-only' consultation has not been delivered as well as it should have been. Residents would like a second round of consultation when more details about the scheme have been put together by Sunnica and when they can offer a means of truly engaging with all of the affected residents (which has been so lacking to date). Main concerns are as follows:

Lack of Access to Information:

- When planning the consultation during the pandemic, how did Sunnica assess what proportion of the population of the affected villages had access to the internet/ computers? The Covid pandemic has highlighted all too clearly that there are many families who do not have laptops/ computers (as shown, for example, with the issues accessing home school work). The *virtual-only* format discriminates against older members of the population and those without computers, as well as those who are less computer literate.
- Sunnica placed far too much reliance on a brochure and questionnaire as a means of 'consulting.' Consulting means 'discussing' - a brochure drop is NOT a discussion. Unfortunately, the Sunnica consultation brochure (which only gave a very superficial overview of some aspects of the proposal) was all that those residents who could not access the virtual information had to rely on, thus excluding many of them from making meaningful assessments of the scheme.
- The Sunnica consultation brochure and webinars made numerous mentions of the PEIR, which Sunnica described as a 'significant document' as it contains important additional detail about the scheme. But this was not made available to all residents – it was only available online. Many villagers were unable to access the electronic version. During a telephone request for a hard copy PEIR, Sunnica said that they couldn't post one out as it was too big for printing and too big for e.g. a DVD. In their brochure and **Statement of Community Consultation (SoCC)** it stated that they could supply hard copies, if requested, at a cost of 35p per page (it's a 900 page document!). This is discriminatory – against those who could not access the e-version and those that could not afford to pay for copies (especially at a time when many are facing financial hardship). After being asked multiple times about obtaining a hard copy of the PEIR in each of the villages (requests from residents, Parish Councils, as well as during the October webinar question sessions, etc.) Sunnica then put the onus on the Parish Councils to try and find a way of getting hard copies available in the villages. Such a vital part of the consultation has to be made available by the applicant from the very beginning of the consultation. It is not the responsibility of the PCs to distribute Sunnica's information about the scheme simply because they were unwilling to make a trip to the villages. Unfortunately, despite these requests, the hard copies never did make it to some of the villages (e.g. Isleham, Snailwell). Even where they did make it, by the time they arrived there was a second national lockdown so people were unable to leave their house to go and read it. Fordham village received their PEIR copy in December, just before the consultation closed (despite Fordham PC sending reminders!). In addition, the villages that did eventually receive a hard copy PEIR (e.g. Chippenham, Freckenham, Fordham) only received a partial document, without any of the appendices that contain further vital detail. Had a full, hard copy of the PEIR (main document and appendices) been made available in all affected villages from 22nd September, more people could have read it. There is no reason why this could not have been done.

- Lack of any physical consultation events excluded many villagers who would otherwise have engaged with the consultation. The pandemic was used as an excuse not to hold any physical meetings whatsoever. However, many of the villages held community events such as Farmer's Markets, Neighbourhood Plan consultations while complying with Government's COVID-19 safety guidelines during the first 7 weeks or so of the consultation period. It was possible for Sunnica to design a safe event for each village, particularly at the beginning of the consultation period. They were asked several times to do this during their webinars but they chose not to.
- Villagers reported difficulties with the consultation booklet maps at a small scale. They were unclear and difficult to read. Small font size was used in the brochure, making it difficult for visually impaired residents to interpret or measure e.g. distances from their homes to the edge of the scheme boundary etc. Maps such as Sunnica East Site A and B Parameter Plan on page 9 show no village names, road names or other landmarks, meaning they must be read in conjunction with other maps which is difficult to manage given the reader may also be using magnifying lenses. Large format maps are required for villagers to comprehend the boundaries and features of the scheme and need to be supplied by the applicant. Sunnica could easily have placed some large scale maps and other information displays in e.g. village halls for people to go and look at – even if these information displays were not manned by Sunnica.
- Consultation booklets were delivered in plain white envelopes addressed to “The Resident” without any mention of Sunnica on the outside (including the return address). Some people mistook these for unwanted marketing materials and discarded them. This point had been raised during the Non-statutory Consultation (which was publicised in similar plain envelopes) but the problem was repeated during the statutory consultation.

Webinars

- Lengthy time delays with the webinars being presented and the recordings uploaded onto websites. This took up a significant portion of the consultation period. The consultation started on 22nd Sept. The first webinar was not until 1st October. Thereafter, webinars were held on 3rd/8th/10th/15th/17th October, each focussing on a different topic. During the first 30-45 mins of each of these webinars Sunnica gave an introduction to the scheme. These introductions to the topics could have been pre-recorded and made available online at the very beginning of the consultation period (i.e. from 22nd Sept). Unfortunately, because of the way Sunnica chose to schedule it's webinars, it meant that anyone wishing to hear e.g. the webinar on Construction and Operations (which first aired on 17th Oct) had to wait almost one month until the webinar on this subject was available. And anyone who missed the 'live' webinars then had to wait a further week or more before they could access the recorded version. Had the introduction for the various elements of the scheme been recorded and made available from the beginning, it would have meant that the 'live' webinars could have focussed on the questions and answers, which is ultimately what 'consultation' is all about. This would also have made the webinars more manageable from a time perspective, and would have allowed people to prepare questions in advance, on all topics. This would have also made it easier to ask questions across all topics in each of the webinar sessions, rather than the questions being 'funnelled' in a topic-specific manner, which limited opportunities for broader questions to be asked.

- Some of the webinars had very poor sound quality. The recorded versions should have been made available online immediately – not over a week later (thus further eating into the time allowed to consider the scheme).
- The webinar format itself was completely inadequate as a means of ‘speaking’ with residents. There was no facility for meaningful dialogue between the people asking and answering a given question. Sunnica could have easily replicated the format used by Lucy Frazer MP, Matt Hancock MP, Brian Harvey (Chair of WSC) etc, who all held excellent Zoom meetings about the Sunnica proposal – these Zoom meetings allowed a proper 2-way dialogue to take place, and ensured that residents’ questions were fully understood and answered. Instead, Sunnica chose to do a 1-way only webinar format in which questions had to be either submitted in advance or via a chat function during the live webinar. This allowed them to pick which questions they wanted to answer (and they did not answer all). It also meant that if the question was misinterpreted/ not fully understood, there was no means of clarifying it. Or if the response was incomplete or unsatisfactory, there was no way of coming back to it. So anyone asking a question did not necessarily get the answers they needed. Sunnica said that they chose this format for GDPR reasons, which seems a rather ‘flimsy’ excuse. Privacy issues can easily be addressed by the individual attendees choosing to enable video or not, use an anonymous name etc.
- The Say No to Sunnica community group summarised three webinar meetings and they show that over 50% of the non-administrative questions were not answered fully.
- Webinars were poorly attended, reinforcing the comments above about their unsuitability as a means of consultation. During the first series of webinars, fewer than 25 connections were made while the event was being transmitted and questions could be asked online.

Inadequate Time to Review Information

- Consultation started as the Covid-19 pandemic was escalating again after the first national lockdown. During the consultation, a second national lockdown was introduced. This 4 week national lockdown was not adequately compensated for by the 16 day extension to the consultation. The lockdown further reduced people’s already limited access to information. In addition, the scheme boundary was modified yet again during this lockdown (on 9th Nov) making it even more difficult to properly consult as the scheme changed part way through the process.
- Isleham and West Row areas were added to the scheme boundary very late (additional land was added just ahead of the statutory consultation starting) so these villages did not realise the huge impact the new scheme boundary would have on their villages. The Sunnica website was not updated with these changes until the statutory consultation started. So these villages effectively had no ‘pre-consultation’ or pre-warning about the new boundary and had very limited time to learn about the new scheme proposal, made even more difficult during the pandemic. (Example: Ely Standard article dated 28th August 2020, just over 3 weeks before the consultation started. The article shows the scheme boundary as having 3 sites, stating that Isleham is only affected by cabling routes. This article was based on information taken from the Sunnica website at that time.....and then contrast this to the reality that was introduced to Isleham via the consultation booklets just a few weeks later [Huge solar plant moves to stages in East Cambs | Ely Standard](#)).

- Councils were given insufficient time to consider the Statement of Community Consultation (from 3rd Aug-1st Sept 2020) during the pandemic. Difficult to achieve when staff are ill/ working remotely etc.
- NSIPs normally have several rounds of statutory consultation before the application is submitted. This makes sense as it allows for as many details as possible to get answered / be decided before the application proceeds. A second round of consultation is essential to properly review the Sunnica scheme and the impact it will have locally.
- Statutory bodies found it difficult to respond in time due to working from home during the pandemic, staff illness etc.
- Sunnica was very slow in replying to written questions, blaming the pandemic. This prevented residents being able to understand the proposal properly in the allocated time. Many official departments (council offices, planning depts, government depts, etc.) also had long response times due to the pandemic, which further delayed residents obtaining information to assist their understanding of the development.

Sunnica's Inability / Unwillingness to Answer Questions / Lack of Detail About the Scheme

- There were many questions that Sunnica were unable/ unwilling to answer during the consultation despite being asked repeatedly throughout the consultation period. Examples include details of decommissioning, details of batteries (battery type, battery number, outline safety plans etc), details as to how they have assessed the land grade, details of job losses, traffic impact and road damage, etc. Sunnica *chose* not to divulge the alternative sites they have allegedly considered (they said they had a list of alternative sites but that they were unwilling to disclose it at this stage). Lucy Frazer MP also requested some of this 'missing' information on behalf of residents, and was also denied by Sunnica. Much of this 'missing' information has been summed up in the excellent joint consultation response document by ECDC/CCC/WSC and SCC. So much of this information is key to making an informed decision about the scheme and the impact it will have for local residents. It is therefore imperative that residents have a further round of consultation to allow more of these questions to be answered. Particularly now that the Covid-19 vaccination programme is well underway, so this could take place in the not too distant future, possibly with some face-to-face meetings.
- Instead of giving details, Sunnica made multiple references to working within 'The Rochdale Envelope.' This principle expects applicants to be able to state the worst-case scenario of many relevant factors for public discussion i.e. environmental impact, safety. But worst-case scenarios were not provided by Sunnica – just an omission of detail. We therefore need a second round of consultation so that these details may be considered. As stated in the Planning Inspectorate's guide to using the Rochdale envelope ([Advice-note-9.- Rochdale-envelope-web.pdf \(planninginspectorate.gov.uk\)](https://www.planninginspectorate.gov.uk/advice-note-9-rochdale-envelope-web.pdf)), *the assessments should be based on a cautious 'worst case' approach; the level of information required should be: "sufficient information to enable 'the main,' or the 'likely significant' effects on the environment to be assessed."* This is clearly not the case with the Sunnica scheme and the absence of any detail about batteries, alternative sites, decommissioning etc. The Rochdale envelope guide also states that, *"The need for 'flexibility' should not be abused - this does*

not give developers an excuse to provide inadequate descriptions of their projects.” We feel strongly that Sunnica’s descriptions are inadequate.

- The site boundaries in the scheme have not been fully decided – it is difficult to assess a scheme when the boundaries are still subject to so much change. (Examples: late addition of land area close to Isleham just before the statutory consultation began; recent withdrawal of La Hogue land from the scheme; landowners along the current proposed cable route are resisting access, so these routes may not be the ones used, etc). The landowners whose land is contained in the scheme have not signed agreements with Sunnica – this makes the scheme very fragile and fluid and difficult for residents to comment on.
- As Sunnica is prepared to use compulsory purchase powers, what other land are they considering compulsory purchasing? The scheme boundaries could be anywhere if this principle is allowed to develop. If Sunnica is going to try and compulsory purchase land they must say what land and how will they fund the purchase. This needed to be stated in the consultation.

Misleading Statements and Claims/ Poor Advertising

- Misleading images in the consultation brochure (shows panels of around 1.5m high). No information in the brochure about the sheer scale of the scheme, and how this compares to the more usual solar farms we have come to know in this area. It implies that the scheme is ‘just another’ solar farm (typical size for this area is around 25-150 acres, not ca. 2800 acres!)...when it is clearly of a very different magnitude and this needed to be highlighted. If approved, this would be the largest solar plant in Europe – but this is not mentioned anywhere in the brochure, or in the SoCC.
- In the brochure introduction the proposal is introduced as, “a new solar energy farm and battery storage facility connecting to the Burwell National Grid Substation in Cambridgeshire.” No mention of the exact location. No mention of the fact it is so huge it spans 2 counties. No mention at all of Suffolk....so residents in Suffolk will not have considered this relevant to them.
- Failure to mention key information about how the scheme will actually operate, which fundamentally changes residents’ understanding of the scheme and is very different to the ‘usual’ solar farms that we have in this area. I.e. no mention of the fact that the huge batteries are intended for 'energy trading' of solar, other renewable and fossil fuel energy types. This aspect of the scheme throws up additional questions (such as why do the batteries need to be stored so far from the Grid, and so close to residential areas, if they are used for trading energy in and out of the Grid? How much energy is lost during the transfer of this energy, especially along such vast cabling routes, etc etc). This aspect in itself requires a second round of consultation as the overwhelming majority of residents are unaware of this, the crux of the entire scheme.
- Feedback from the pre-consultation process (during which the proposal did not include land at Isleham and West Row) was that the scheme was too big. Misleading statements appeared in the statutory consultation brochure that the scheme was made ‘smaller’ as Sunnica had taken the feedback from the pre consultation into account. This is not true.

The current scheme boundary change was due to a landowner in Freckenham withdrawing his land, thus forcing Sunnica to look for alternatives. The alternative that they chose (near Isleham and West Row) meant that 1 site had to be split into 2 'smaller' sites, but this does not affect the overall size of the scheme. In fact, it makes it even more unpalatable as it requires additional cabling routes to connect the patchwork of solar sites together. Other claimed 'reductions' included amendments relating to preliminary environmental and archaeological findings - not as a result of listening to community feedback (as indicated by Sunnica).

- Consultation notifications in local newspapers were written in the small print at the back of the newspapers – these are not widely read (see photograph example below from the Newmarket Journal). Again, no mention of the scale / location was given in the adverts. Whilst this might meet their 'bare minimum' statutory obligations, Sunnica has an **award winning communications company** working on their scheme, so it is very disappointing that they could not have found a more effective means of advertising the consultation...through local village publications, community Facebook groups etc. These are much more widely read by the local residents, particularly during a pandemic. The village publications (e.g. Informer in Isleham, Turnpike in Red Lodge, etc) are hand delivered to every household in the directly affected villages and would have been a far more effective way of engaging with residents about the consultation.
- Sunnica did run a small number of 'panel adverts' in a few local papers, but these again used very small white text on a dark background, making them difficult to read. And the same description for the scheme was used as discussed earlier in this document (i.e. no mention of the scheme being in Suffolk, no mention of it being a NSIP, no mention of the size, location, etc. etc.). Many residents (especially in Suffolk) would therefore not pay any regard to these. Surely the point of advertising is to draw the attention of *all* affected people to what the proposal actually is and to attract their engagement. Their newspaper adverts did no such thing. Sunnica also claimed during one of their webinars that they ran a paid Facebook campaign resulting in several thousand page impressions – but we are not aware of any of the village FB community pages getting any 'hits,' so it's unclear who the recipients actually were.
- No physical advertising in the form of posters and banners was available in the villages until Freckenham Parish council requested these 5 weeks into the consultation. Even then, only 1 small banner was sent per village. More banners/ posters/ placards etc were needed to draw attention to the consultation – one solitary banner per village has practically no impact. And by the time the banners arrived and were put in place we were in a second national lockdown, meaning that residents were not moving around the villages, so didn't see them. The banners also had incorrect dates on them, which were never changed. The use of banners agrees with the adopted West Suffolk Council Statement of Community Involvement on "Line of sight publicity" as recommended by Advice Note 2 from the Planning Inspectorate, Section 5.3 "A local authority's adopted Statement of Community Involvement (or Community Involvement Scheme in Wales) is likely to have a bearing on its response to the developer's SoCC Consultation."

[REDACTED]

[REDACTED]

- The lack of effective advertising limited the awareness of the consultation, which was reflected in the lack of engagement in online activities such as the webinars (where fewer than 20 connections were made for webinars on the 1st and 3rd October 2020). Sunnica could have advertised in the local village publications and community social media pages – they chose not to do this. A second round of consultation is required to allow proper advertising in the press as detailed in the Statement of Community Consultation, as well as community publications and social media platforms, in order to allow more of the affected residents to engage properly with the consultation.

No Means of Tracking Consultation Response/ Ensuring that Questionnaire Responses Actually got to Sunnica

- Consultation responses that were submitted via the paper questionnaire were not traceable. The questionnaires were not numbered/ coded, so there is no way of gauging gaps in responses or issuing receipts to confirm they arrived at the Sunnica address. Consultation responses submitted via the online questionnaire also had no confirmation/ acknowledgement of receipt, which is normal practice for online surveys. It would have also been useful for those submitting online to receive a confirmation copy of what they had submitted. This means that residents have no way of knowing if their views have even made it to Sunnica. A second round of consultation is needed with better traceability of the responses so that residents can be assured that their comments have been included in the consultation report.

Statement of Community Consultation (SoCC)

- Mistakes and misleading information in the SoCC and in newspaper adverts (see also previous notes on advertising). Scheme advertised as, “Sunnica Energy Farm is a proposed new solar energy farm and battery storage facility connecting to the Burwell National Grid Substation in Cambridgeshire.” No mention of the size and scale. No mention of location. No mention at all of Suffolk – only Cambridgeshire. So residents in Suffolk unlikely to take much notice.
- Mention of previous solar projects by Tribus/PS renewables is misleading (e.g. Oakfield and Eveley, which are on a totally different scale at 3.3 MW and 49 MW, respectively). Implies that this new scheme is of a similar ilk. SoCC also mentions that it is a NSIP as it exceeds 50 MW...but it doesn't say by how much. 500 MW is a significant 'leap' from what a 'typical' solar farm output is considered to be (the ones in this area are between 5 and 38 MW). The purpose of a description/ advert is to draw the attention of the public to what the scheme actually is. It needs to adequately reflect what is being proposed. The misleading descriptions in the SoCC and adverts do not do this. By way of an analogy, it is like a council advertising a 'housing development with associated infrastructure' when they really mean to build a whole new town.
- In the SoCC it states that there are “two battery energy storage systems” – but three were included in the plan.
- It specifically states in SoCC that locals will be asked to consult on: Operational impacts, Impacts from decommissioning - but there is negligible information provided on these.

Sunnica instead stated during a webinar that it's decommissioning plan will be put together 6 months prior to decommissioning taking place, so they had very little detail at this stage. How are we, therefore, expected to consult on this? Not even a 'worst-case' scenario was provided. No details about how it might be decommissioned, which parts are likely to be decommissioned, no detail at all on how the land is meant to be restored to "it's previous condition" (which is unlikely given the potential soil damage resulting from this massive scale construction project). How are people meant to form a view of the legacy we will be left with after this scheme ends with no detail provided on which to consult?

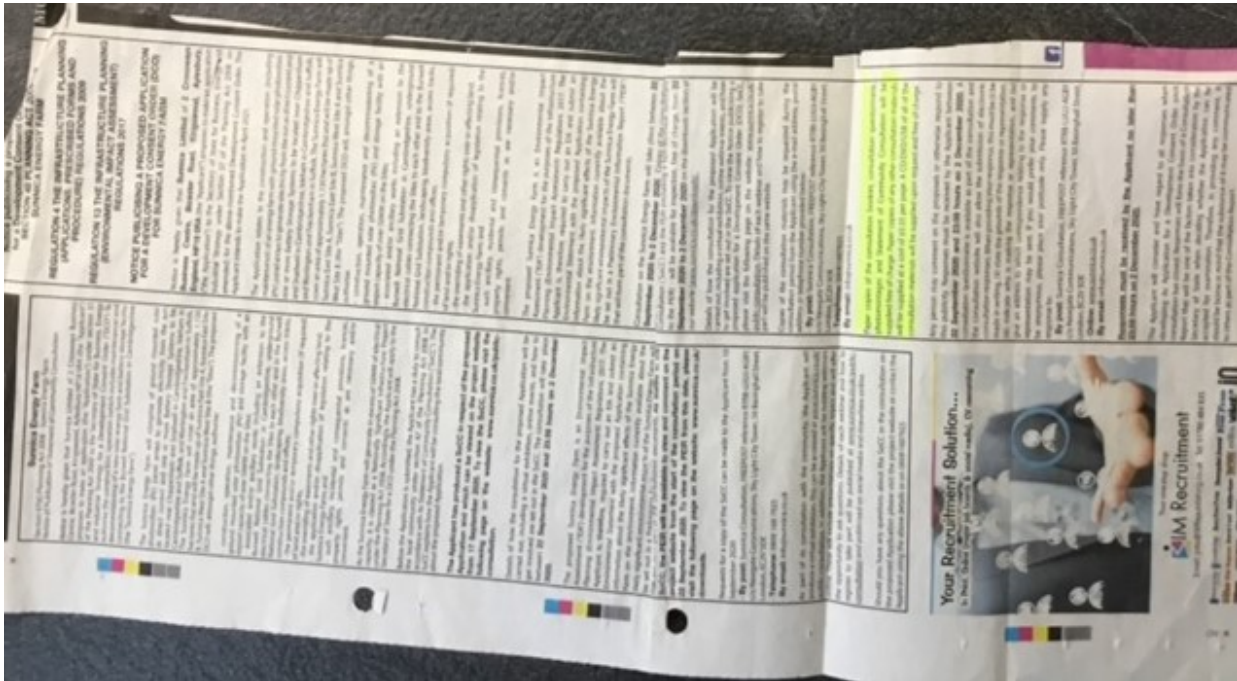
- In the SoCC it also specifically states that the public will be asked for views on the PEIR. As mentioned previously, this was not made available to all residents, so how can they be consulted? Sunnica said the PEIR was too big to put onto DVD, so anyone without a computer/ internet access cannot see it. In the SoCC it states that hard copies will be available on request – but at a charge of 35p per sheet as mentioned previously. This is discriminatory. Sunnica was requested multiple times in the webinars to provide hard copies of the PEIR in the villages....but this was not honoured. Chippenham and Freckenham got partial copies (the main document, but none of the supporting appendices). Isleham and Snailwell did not receive any hard copy at all. And even if the villages did receive a partial hard copy, it was close to/ during the 2nd national lockdown and couldn't be accessed. This document is a key part of the consultation and should have been made available in villages right from the very beginning of the consultation period. The Planning Inspectorate "Guidance on procedural requirements for major infrastructure projects" suggests, "*Applicants should engage proactively with local authorities and local communities to find alternative means to provide access to the documentation where required, to ensure on-going fair participation in the planning process, for example by providing copies of documents on a USB flash drive where parties have access to a computer but have limited or no internet access or, where reasonably practicable, by making copies of documents available for inspection free of charge where a person is unable to access the documentation electronically or finds it difficult to do so.*"

Complaints

- ECDC councillors have already complained about the "woefully inadequate and laughable" consultation ([East Cambridgeshire District Council - YouTube](#) relevant meeting, Sunnica starts about 2 hours in [East Cambridgeshire District Council, Planning Committee 2nd September 2020 - YouTube](#)
- [Say No To Sunnica - YouTube](#) – WSC Councillor describes the consultation as 'farcical' (listen to 3.01 mins)
- Despite claims in the SoCC, ECDC councillors said that 3 Cambridgeshire Parish Councils that are directly affected by the scheme have had NO direct contact from Sunnica. (Ely Standard Newspaper article Sept 2020: ECDC councillors ['Man up' and start talking energy firm told](#)).
- Suffolk councillors requested further information so that people can make an informed assessment of the scheme. Comments such as, "At this stage of the process we have many questions to which the answers are not entirely clear, so it's appropriate at this stage to take these issues to the developer." And, "The sheer scale of the project means its impact will be significant and very far-reaching ([REDACTED]
- Freckenham Parish Council – sent letter to Sunnica on 9th Oct outlining many concerns about the inadequacy of the consultation. Sunnica declined to offer additional support for

most of the concerns raised ([9.10.20-Sunnica-stat-consultation-complaint.docx.pdf](https://www.suffolk.cloud/9.10.20-Sunnica-stat-consultation-complaint.docx.pdf) ([suffolk.cloud](https://www.suffolk.cloud)))

Example of newspaper advertising. Newmarket Journal – small print at back of paper



Example of 'Panel Ad.' Bury Free Press

Public consultation
22 September 2020 – 2 December 2020

Sunnica Energy Farm is a proposed new energy farm with solar photovoltaic (PV) and energy storage infrastructure connecting to the Burwell National Grid Substation in Cambridgeshire.

Find out more

You can find out more about the proposals and how to respond the consultation by:

1. Going to our website, sunnica.co.uk/public-consultation
You can view all the documents we are publishing as part of the consultation as well as a virtual public exhibition there.
2. Contacting us to request a copy of a booklet summarising the proposals and a consultation questionnaire.
3. Viewing a series of webinars we will give about the proposals online. These will offer the opportunity to ask questions about the proposals. You can find a list of all the webinars and register to take part at sunnica.co.uk/public-consultation
4. Booking an appointment to speak to the project team individually. You can book the appointment using the contact details in this advert.
5. Contacting us directly using the details below.

Contact us
For further information, please go to sunnica.co.uk or contact us on info@sunnica.co.uk or 08081667925.

Alternatively, you can write to us at: Sunnica Consultation, FREEPOST reference RTM8-LULU-AGRY, c/o Newgate Communications, Sky Light City Tower, 80 Beaulieu Street, London, EC2V 8DE



From: [REDACTED]
To: [Sunnica Energy Farm](#)
Subject: Sunnica Statutory Consultation
Date: 19 November 2021 13:23:01
Attachments: [3BB38DAF221C4238813617F1637602EA.png](#)
[23.3.21 SCC letter confirming Stat Consultation inadequate.pdf](#)
[23.3.21 WSC letter confirming Stat Consultation inadequate.pdf](#)
[Freckenham statutory consultation survey results graphs and comments 21Mar2021.pdf](#)
[Parish Councils Alliance - Sunnica Group - Inadequacy of statutory consultation bullets 7th feb\[16144\].pdf](#)
[Letter to Freckenham Parish Council - 15 October 2020.pdf](#)
[9.10.20 - Sunnica stat consultation complaint.docx.pdf](#)

Good afternoon

Please find attached copy of letter sent to Luke Murray in October 2020 along with his response and copies of letters sent to West Suffolk District Council and Suffolk County Council on 23rd March 2021 in regard to the concerns and inadequacy of the Sunnica Statutory Consultation. The concerns are echoed by the residents of Freckenham, which are shown in the survey results attached.

Lastly please find attached a document detailing the concerns as per the Parish Council Alliance Sunnica Group.

Kind regards

Jadi

Jadi Coe

Clerk to Freckenham Parish Council

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

FRECKENHAM PARISH COUNCIL

Jadi Coe
Clerk to the Council

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Suffolk County Council
Planning Department
Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

23rd March 2021

Dear Council

Sunnica Statutory Consultation

Freckenham Parish Council would like to inform you that they still find that Sunnica's Statutory Consultation was inadequate, and requests that this letter and accompanying documents are shared with the Planning Inspectorate as part of the Council's "Adequacy of Consultation" representation during the Acceptance phase. This request is per paragraph 7.1 of the Planning Inspectorate's Advice Note 2 "The role of local authorities in the development consent process".

Freckenham Parish Council engaged with Sunnica during the Statutory Consultation in an attempt to raise concerns while the consultation was still underway, but found the response from Sunnica did not address the concerns raised. Copies of the relevant correspondence are attached.

Freckenham Parish Council is a member of the Parish Councils Alliance - Sunnica Group, and endorses the list of inadequacies found by this group. A copy of the list is attached.

Finally, Freckenham Parish Council carried out a household survey within Freckenham on the Sunnica Statutory Consultation, using four standard questions supplied by the Parish Councils Alliance, Sunnica Group. The survey results and comments raised are attached.

Yours faithfully

[REDACTED]

Jadi Coe
Clerk to the Parish Council

CC Brian Harvey (WSC)
Andy Drummond (WSC)
Louis Busttuil (SCC)
Richard Rout (SCC)

FRECKENHAM PARISH COUNCIL

Jadi Coe
Clerk to the Council

[REDACTED]
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West Suffolk Council
Planning Department
West Suffolk House
Western Way
Bury St Edmunds
IP33 3YU

23rd March 2021

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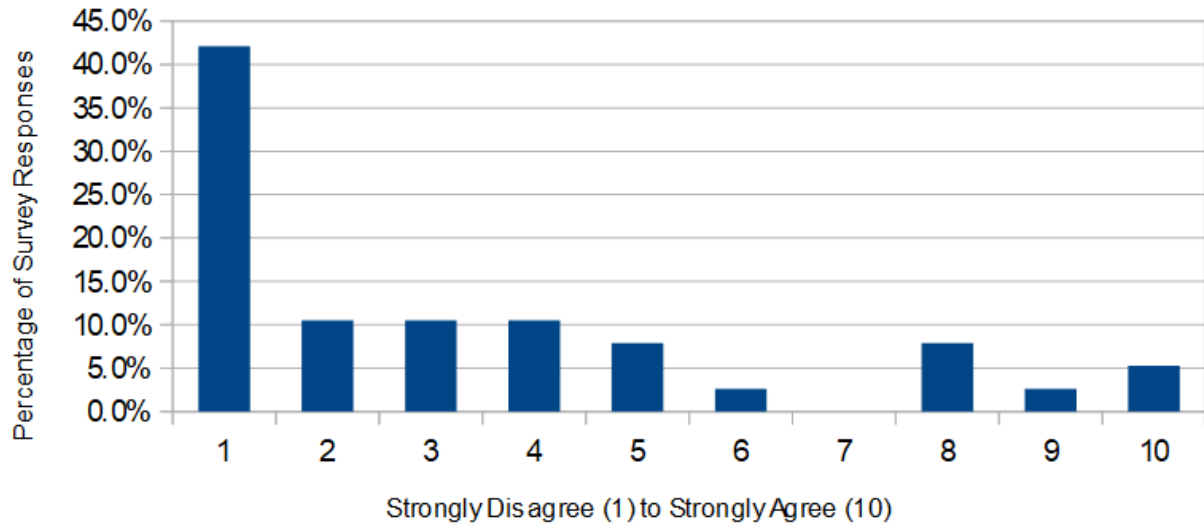
CC Brian Harvey (WSC)
Andy Drummond (WSC)
Louis Busttuil (SCC)
Richard Rout (SCC)

Sunnica Statutory Consultation Survey by Freckenham Parish Council.

Graphs of responses to questions

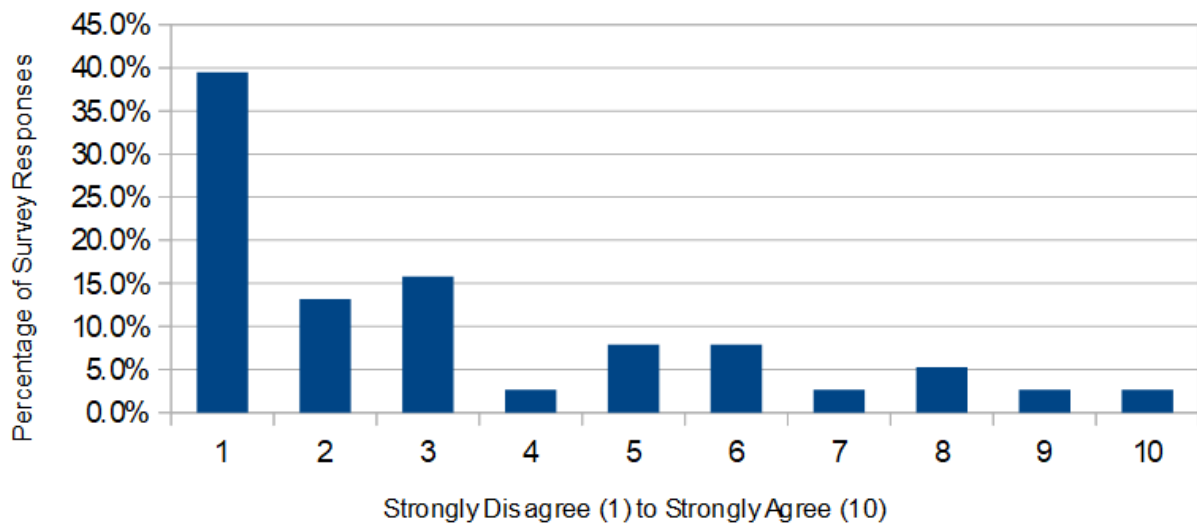
Sunnica Statutory Consultation Survey by Freckenham Parish Council

Q1: I had no problems using the booklet and online information provided



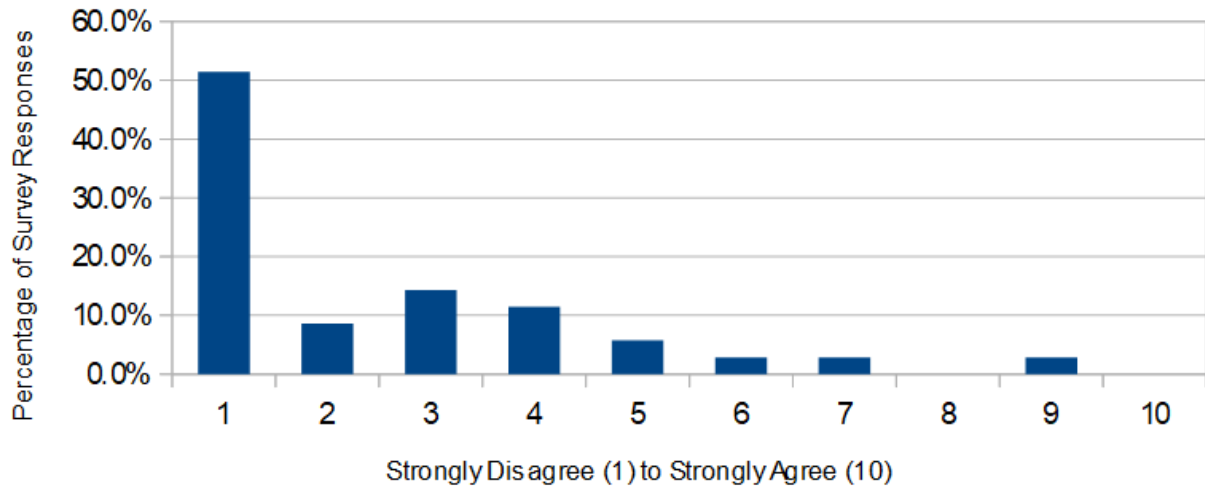
Sunnica Statutory Consultation Survey by Freckenham Parish Council

Q2: The information supplied was easy to understand



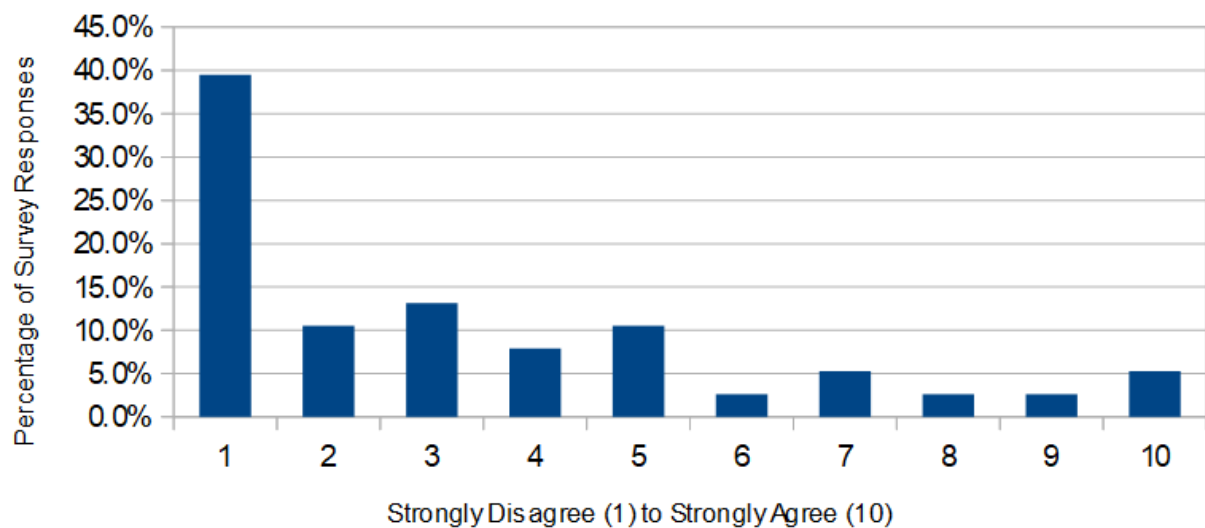
Sunnica Statutory Consultation Survey by Freckenham Parish Council

Q3: The online exhibition, webinars and contact arrangements meant questions could be raised and answered



Sunnica Statutory Consultation Survey by Freckenham Parish Council

Q4: The consultation has helped me to respond to Sunnica's proposal



Written comments received, organised by survey question.

Comments to Question 1

“I had no problems using the booklet and online information provided.”

Some detail ambiguous

Badly presented

Failed to provide maps of a standard that could help identify where the proposed sites were, i.e. poor colour choice and no village names

Booklet light on detail. Online information very dense. Too much cross-referencing with multiple PEIR volumes, never able to find certain figures or images

The plans were deliberately difficult to understand

Map presentation both in the booklet and online was extremely poor with grey and white being a resolution that is difficult to read. Research on the parameter plan was made arduous due to all village names being removed, why?

Maps were too small and information was biased in Sunnica's favour

Montages were no convincing

At times the information wasn't up-to-date

Vague and provided little clear information I required

Maps not clear in booklet

Booklet vague, not aware of the online information available

Unclear, too much irrelevant waffle.

The map was very poor in detail and by being online, the views of most senior citizens were completely ignored.

The online was better

The booklet was not easy to read. It assumed knowledge of the scheme that I did not have and didn't find its introduction.

I found the booklet very difficult to understand, particularly the map section which was in very small print and impossible to understand.

All information unclear

Detail could have been better and more explanatory. Printing and maps too small and lacked detail

Comments to Question 2

“The information supplied was easy to understand.”

Technical information needed more clarity

As obscure as possible

Information was insufficient and you needed to refer to various web documents to gather information on the same topic

No – too much information, often repetitive, too often vague. The process was very time consuming.

Not enough information was given in respect of volume of traffic concerning construction of the various sites

Information was not easy to understand due to the amount of cross referencing required to navigate the data. Why did Sunnica wait until mid November to substantially update the original consultation. This was not new information, therefore it should have been available at the onset of the consultation in September.

Vague and provided little clear information I required

Too much superfluous information and jargon. Where technical information required this was

lacking.

The information was limited and the booklet makes some pretty big statements and claims backed up by no proof, see my letter [statutory consultation response]

The information was not at all easy to understand and should have been available much earlier.

The drawings could have been larger

The information was not easy to understand. It was technical in content and used complex language.

It wasn't written to be read by an ordinary person in the street.

It seemed deliberately unclear

Not entirely clear; could have been better, one-sided to their benefit. Technical details, poor specification.

Comments to Question 3

“The online exhibition, webinars and contact arrangements meant questions could be raised and answered.”

We do not do webinars. When contacting Sunnica mid November 2020, they were unable to give an indication of solar panels to be used, because scheme design was not far enough advanced and supplier had not been confirmed.

Maps impossible to follow

Webinars were poor, answering of questions insufficient so you had to go back with more questions and wait for replies, which usually just said to look at X documents on web.

Favoured experienced computer users. My emailed questions waited one month for reply, then only half answered, the rest again cross-referenced to PEIR volumes.

There was no ability to raise questions in any satisfactory forum

Yes, questions could be raised but the answers were very much a one-way communication; therefore not answered in a meaningful manner. Written answers to questions raised took far too long to be answered and were seriously open to misinterpretation.

Sunnica used the pandemic in order to avoid objectors' face-to-face questions

Did not use any of these [webinars] so not applicable

Answers were often neither straight nor correct. As a solar array owner with full-time recording of current and past performance, some answers were badly wrong.

[webinars] At difficult times during the day

The Sunnica team did not answer questions and it was impossible to have a discussion

Questions were not fully answered as submitted and structure of webinar Q&A meant it was not possible to debate or clarify answer.

I was never made aware of the online exhibition or webinars.

Absolutely not

Any questions raised were very much a one way dialogue. Written questions took far too long to get any answer.

There was not enough time for questions, the answers were sidestepped

It was easy to ask the questions but the answers weren't always answered fully, or we were told Sunnica hadn't formulated an answer or didn't wish to release the information.

The exhibition and webinars in my opinion were not consultative, but a putting forward of Sunnica's plans for our area.

Inadequate answers given and unable to challenge answers given

I think it was a difficult process and not easy to ask questions, discuss points or get straightforward answers.

Questions raised were not always answered in detail if at all. Information appeared to be held back or they did not know themselves.

Comments to Question 4

“The consultation has helped me to respond to Sunnica's proposal.”

Not this type of consultation

Has added strength to my resolve to continue to protest

Consultation was very one-sided, Sunnica had little in depth knowledge of Health and Safety issues raised on battery storage and emergency procedures as just one example.

This wasn't a 'consultation' – that needs to be physically interactive: it was a statement of intent but they kept changing the goal posts.

Plans were constantly changing and even now there are no definite sites for construction.

The consultation has helped me to respond to Sunnica's proposal and reject it wholeheartedly!

The consultation was flawed and ambiguous. Conclusions in the Environmental Impact Assessment report were one sided and adopted a “laissez faire” approach with poor respect for rural communities and the environment alike.

I am not in favour of this Sunnica build at all.

Yes, the lack of consultation has convinced me to strongly oppose the proposal.

Several questions remained unanswered

Disgraceful all of it. It will destroy wildlife and should be stopped, or made much, much smaller.

Consultation, especially at the start, has been abysmal.

Neither the consultation nor individual communication to Sunnica provides answers

I did not feel involved and felt it was a 'tick in the box' exercise.

Please see my attached letter sent to Alok Sharma which demonstrates that there was considerable 'vagueness' to much of the content of the booklet. My questions demonstrate that we need more clarity.

It allowed me to respond, nothing else.

The consultation was very muddled. The statements in the Environmental Impact Assessment were very much from Sunnica's viewpoint and showed very little understanding of rural communities.

Yes not against solar power just the size of the project. As a note I wanted to put solar panels on the roof of my house and was told NO.

The consultation has created grave doubts in me on the fitness of Sunnica to create and manage a scheme of this complexity.

This has made me do all I can to prevent this proposal being forced upon this community.

Responded where able to but very unclear information given.

To a degree, but I feel it was not a fair opportunity to discuss it [the proposal].

This development should not take place. Consultation should have been put back until such time as open meetings could take place. This consultation type was entirely to their benefit and not to the general public.

Inadequacy of Consultation – bullets

Sunnica's 'virtual-only' consultation has not been delivered as well as it should have been. Residents would like a second round of consultation when more details about the scheme have been put together by Sunnica and when they can offer a means of truly engaging with all of the affected residents (which has been so lacking to date). Main concerns are as follows:

Lack of Access to Information:

- When planning the consultation during the pandemic, how did Sunnica assess what proportion of the population of the affected villages had access to the internet/ computers? The Covid pandemic has highlighted all too clearly that there are many families who do not have laptops/ computers (as shown, for example, with the issues accessing home school work). The *virtual-only* format discriminates against older members of the population and those without computers, as well as those who are less computer literate.
- Sunnica placed far too much reliance on a brochure and questionnaire as a means of 'consulting.' Consulting means 'discussing' - a brochure drop is NOT a discussion. Unfortunately, the Sunnica consultation brochure (which only gave a very superficial overview of some aspects of the proposal) was all that those residents who could not access the virtual information had to rely on, thus excluding many of them from making meaningful assessments of the scheme.
- The Sunnica consultation brochure and webinars made numerous mentions of the PEIR, which Sunnica described as a 'significant document' as it contains important additional detail about the scheme. But this was not made available to all residents – it was only available online. Many villagers were unable to access the electronic version. During a telephone request for a hard copy PEIR, Sunnica said that they couldn't post one out as it was too big for printing and too big for e.g. a DVD. In their brochure and **Statement of Community Consultation (SoCC)** it stated that they could supply hard copies, if requested, at a cost of 35p per page (it's a 900 page document!). This is discriminatory – against those who could not access the e-version and those that could not afford to pay for copies (especially at a time when many are facing financial hardship). After being asked multiple times about obtaining a hard copy of the PEIR in each of the villages (requests from residents, Parish Councils, as well as during the October webinar question sessions, etc.) Sunnica then put the onus on the Parish Councils to try and find a way of getting hard copies available in the villages. Such a vital part of the consultation has to be made available by the applicant from the very beginning of the consultation. It is not the responsibility of the PCs to distribute Sunnica's information about the scheme simply because they were unwilling to make a trip to the villages. Unfortunately, despite these requests, the hard copies never did make it to some of the villages (e.g. Isleham, Snailwell). Even where they did make it, by the time they arrived there was a second national lockdown so people were unable to leave their house to go and read it. Fordham village received their PEIR copy in December, just before the consultation closed (despite Fordham PC sending reminders!). In addition, the villages that did eventually receive a hard copy PEIR (e.g. Chippenham, Freckenham, Fordham) only received a partial document, without any of the appendices that contain further vital detail. Had a full, hard copy of the PEIR (main document and appendices) been made available in all affected villages from 22nd September, more people could have read it. There is no reason why this could not have been done.

- Lack of any physical consultation events excluded many villagers who would otherwise have engaged with the consultation. The pandemic was used as an excuse not to hold any physical meetings whatsoever. However, many of the villages held community events such as Farmer's Markets, Neighbourhood Plan consultations while complying with Government's COVID-19 safety guidelines during the first 7 weeks or so of the consultation period. It was possible for Sunnica to design a safe event for each village, particularly at the beginning of the consultation period. They were asked several times to do this during their webinars but they chose not to.
- Villagers reported difficulties with the consultation booklet maps at a small scale. They were unclear and difficult to read. Small font size was used in the brochure, making it difficult for visually impaired residents to interpret or measure e.g. distances from their homes to the edge of the scheme boundary etc. Maps such as Sunnica East Site A and B Parameter Plan on page 9 show no village names, road names or other landmarks, meaning they must be read in conjunction with other maps which is difficult to manage given the reader may also be using magnifying lenses. Large format maps are required for villagers to comprehend the boundaries and features of the scheme and need to be supplied by the applicant. Sunnica could easily have placed some large scale maps and other information displays in e.g. village halls for people to go and look at – even if these information displays were not manned by Sunnica.
- Consultation booklets were delivered in plain white envelopes addressed to “The Resident” without any mention of Sunnica on the outside (including the return address). Some people mistook these for unwanted marketing materials and discarded them. This point had been raised during the Non-statutory Consultation (which was publicised in similar plain envelopes) but the problem was repeated during the statutory consultation.

Webinars

- Lengthy time delays with the webinars being presented and the recordings uploaded onto websites. This took up a significant portion of the consultation period. The consultation started on 22nd Sept. The first webinar was not until 1st October. Thereafter, webinars were held on 3rd/8th/10th/15th/17th October, each focussing on a different topic. During the first 30-45 mins of each of these webinars Sunnica gave an introduction to the scheme. These introductions to the topics could have been pre-recorded and made available online at the very beginning of the consultation period (i.e. from 22nd Sept). Unfortunately, because of the way Sunnica chose to schedule it's webinars, it meant that anyone wishing to hear e.g. the webinar on Construction and Operations (which first aired on 17th Oct) had to wait almost one month until the webinar on this subject was available. And anyone who missed the 'live' webinars then had to wait a further week or more before they could access the recorded version. Had the introduction for the various elements of the scheme been recorded and made available from the beginning, it would have meant that the 'live' webinars could have focussed on the questions and answers, which is ultimately what 'consultation' is all about. This would also have made the webinars more manageable from a time perspective, and would have allowed people to prepare questions in advance, on all topics. This would have also made it easier to ask questions across all topics in each of the webinar sessions, rather than the questions being 'funnelled' in a topic-specific manner, which limited opportunities for broader questions to be asked.

- Some of the webinars had very poor sound quality. The recorded versions should have been made available online immediately – not over a week later (thus further eating into the time allowed to consider the scheme).
- The webinar format itself was completely inadequate as a means of ‘speaking’ with residents. There was no facility for meaningful dialogue between the people asking and answering a given question. Sunnica could have easily replicated the format used by Lucy Frazer MP, Matt Hancock MP, Brian Harvey (Chair of WSC) etc, who all held excellent Zoom meetings about the Sunnica proposal – these Zoom meetings allowed a proper 2-way dialogue to take place, and ensured that residents’ questions were fully understood and answered. Instead, Sunnica chose to do a 1-way only webinar format in which questions had to be either submitted in advance or via a chat function during the live webinar. This allowed them to pick which questions they wanted to answer (and they did not answer all). It also meant that if the question was misinterpreted/ not fully understood, there was no means of clarifying it. Or if the response was incomplete or unsatisfactory, there was no way of coming back to it. So anyone asking a question did not necessarily get the answers they needed. Sunnica said that they chose this format for GDPR reasons, which seems a rather ‘flimsy’ excuse. Privacy issues can easily be addressed by the individual attendees choosing to enable video or not, use an anonymous name etc.
- The Say No to Sunnica community group summarised three webinar meetings and they show that over 50% of the non-administrative questions were not answered fully.
- Webinars were poorly attended, reinforcing the comments above about their unsuitability as a means of consultation. During the first series of webinars, fewer than 25 connections were made while the event was being transmitted and questions could be asked online.

Inadequate Time to Review Information

- Consultation started as the Covid-19 pandemic was escalating again after the first national lockdown. During the consultation, a second national lockdown was introduced. This 4 week national lockdown was not adequately compensated for by the 16 day extension to the consultation. The lockdown further reduced people’s already limited access to information. In addition, the scheme boundary was modified yet again during this lockdown (on 9th Nov) making it even more difficult to properly consult as the scheme changed part way through the process.
- Isleham and West Row areas were added to the scheme boundary very late (additional land was added just ahead of the statutory consultation starting) so these villages did not realise the huge impact the new scheme boundary would have on their villages. The Sunnica website was not updated with these changes until the statutory consultation started. So these villages effectively had no ‘pre-consultation’ or pre-warning about the new boundary and had very limited time to learn about the new scheme proposal, made even more difficult during the pandemic. (Example: Ely Standard article dated 28th August 2020, just over 3 weeks before the consultation started. The article shows the scheme boundary as having 3 sites, stating that Isleham is only affected by cabling routes. This article was based on information taken from the Sunnica website at that time.....and then contrast this to the reality that was introduced to Isleham via the consultation booklets just a few weeks later [Huge solar plant moves to stages in East Cambs | Ely Standard](#)).

- Councils were given insufficient time to consider the Statement of Community Consultation (from 3rd Aug-1st Sept 2020) during the pandemic. Difficult to achieve when staff are ill/ working remotely etc.
- NSIPs normally have several rounds of statutory consultation before the application is submitted. This makes sense as it allows for as many details as possible to get answered / be decided before the application proceeds. A second round of consultation is essential to properly review the Sunnica scheme and the impact it will have locally.
- Statutory bodies found it difficult to respond in time due to working from home during the pandemic, staff illness etc.
- Sunnica was very slow in replying to written questions, blaming the pandemic. This prevented residents being able to understand the proposal properly in the allocated time. Many official departments (council offices, planning depts, government depts, etc.) also had long response times due to the pandemic, which further delayed residents obtaining information to assist their understanding of the development.

Sunnica's Inability / Unwillingness to Answer Questions / Lack of Detail About the Scheme

- There were many questions that Sunnica were unable/ unwilling to answer during the consultation despite being asked repeatedly throughout the consultation period. Examples include details of decommissioning, details of batteries (battery type, battery number, outline safety plans etc), details as to how they have assessed the land grade, details of job losses, traffic impact and road damage, etc. Sunnica *chose* not to divulge the alternative sites they have allegedly considered (they said they had a list of alternative sites but that they were unwilling to disclose it at this stage). Lucy Frazer MP also requested some of this 'missing' information on behalf of residents, and was also denied by Sunnica. Much of this 'missing' information has been summed up in the excellent joint consultation response document by ECDC/CCC/WSC and SCC. So much of this information is key to making an informed decision about the scheme and the impact it will have for local residents. It is therefore imperative that residents have a further round of consultation to allow more of these questions to be answered. Particularly now that the Covid-19 vaccination programme is well underway, so this could take place in the not too distant future, possibly with some face-to-face meetings.
- Instead of giving details, Sunnica made multiple references to working within 'The Rochdale Envelope.' This principle expects applicants to be able to state the worst-case scenario of many relevant factors for public discussion i.e. environmental impact, safety. But worst-case scenarios were not provided by Sunnica – just an omission of detail. We therefore need a second round of consultation so that these details may be considered. As stated in the Planning Inspectorate's guide to using the Rochdale envelope ([Advice-note-9.- Rochdale-envelope-web.pdf \(planninginspectorate.gov.uk\)](https://www.planninginspectorate.gov.uk/advice-note-9-rochdale-envelope-web.pdf)), *the assessments should be based on a cautious 'worst case' approach; the level of information required should be: "sufficient information to enable 'the main,' or the 'likely significant' effects on the environment to be assessed."* This is clearly not the case with the Sunnica scheme and the absence of any detail about batteries, alternative sites, decommissioning etc. The Rochdale envelope guide also states that, *"The need for 'flexibility' should not be abused - this does*

not give developers an excuse to provide inadequate descriptions of their projects.” We feel strongly that Sunnica’s descriptions are inadequate.

- The site boundaries in the scheme have not been fully decided – it is difficult to assess a scheme when the boundaries are still subject to so much change. (Examples: late addition of land area close to Isleham just before the statutory consultation began; recent withdrawal of La Hogue land from the scheme; landowners along the current proposed cable route are resisting access, so these routes may not be the ones used, etc). The landowners whose land is contained in the scheme have not signed agreements with Sunnica – this makes the scheme very fragile and fluid and difficult for residents to comment on.
- As Sunnica is prepared to use compulsory purchase powers, what other land are they considering compulsory purchasing? The scheme boundaries could be anywhere if this principle is allowed to develop. If Sunnica is going to try and compulsory purchase land they must say what land and how will they fund the purchase. This needed to be stated in the consultation.

Misleading Statements and Claims/ Poor Advertising

- Misleading images in the consultation brochure (shows panels of around 1.5m high). No information in the brochure about the sheer scale of the scheme, and how this compares to the more usual solar farms we have come to know in this area. It implies that the scheme is ‘just another’ solar farm (typical size for this area is around 25-150 acres, not ca. 2800 acres!)...when it is clearly of a very different magnitude and this needed to be highlighted. If approved, this would be the largest solar plant in Europe – but this is not mentioned anywhere in the brochure, or in the SoCC.
- In the brochure introduction the proposal is introduced as, “a new solar energy farm and battery storage facility connecting to the Burwell National Grid Substation in Cambridgeshire.” No mention of the exact location. No mention of the fact it is so huge it spans 2 counties. No mention at all of Suffolk....so residents in Suffolk will not have considered this relevant to them.
- Failure to mention key information about how the scheme will actually operate, which fundamentally changes residents’ understanding of the scheme and is very different to the ‘usual’ solar farms that we have in this area. I.e. no mention of the fact that the huge batteries are intended for 'energy trading' of solar, other renewable and fossil fuel energy types. This aspect of the scheme throws up additional questions (such as why do the batteries need to be stored so far from the Grid, and so close to residential areas, if they are used for trading energy in and out of the Grid? How much energy is lost during the transfer of this energy, especially along such vast cabling routes, etc etc). This aspect in itself requires a second round of consultation as the overwhelming majority of residents are unaware of this, the crux of the entire scheme.
- Feedback from the pre-consultation process (during which the proposal did not include land at Isleham and West Row) was that the scheme was too big. Misleading statements appeared in the statutory consultation brochure that the scheme was made ‘smaller’ as Sunnica had taken the feedback from the pre consultation into account. This is not true.

The current scheme boundary change was due to a landowner in Freckenham withdrawing his land, thus forcing Sunnica to look for alternatives. The alternative that they chose (near Isleham and West Row) meant that 1 site had to be split into 2 'smaller' sites, but this does not affect the overall size of the scheme. In fact, it makes it even more unpalatable as it requires additional cabling routes to connect the patchwork of solar sites together. Other claimed 'reductions' included amendments relating to preliminary environmental and archaeological findings - not as a result of listening to community feedback (as indicated by Sunnica).

- Consultation notifications in local newspapers were written in the small print at the back of the newspapers – these are not widely read (see photograph example below from the Newmarket Journal). Again, no mention of the scale / location was given in the adverts. Whilst this might meet their 'bare minimum' statutory obligations, Sunnica has an **award winning communications company** working on their scheme, so it is very disappointing that they could not have found a more effective means of advertising the consultation...through local village publications, community Facebook groups etc. These are much more widely read by the local residents, particularly during a pandemic. The village publications (e.g. Informer in Isleham, Turnpike in Red Lodge, etc) are hand delivered to every household in the directly affected villages and would have been a far more effective way of engaging with residents about the consultation.
- Sunnica did run a small number of 'panel adverts' in a few local papers, but these again used very small white text on a dark background, making them difficult to read. And the same description for the scheme was used as discussed earlier in this document (i.e. no mention of the scheme being in Suffolk, no mention of it being a NSIP, no mention of the size, location, etc. etc.). Many residents (especially in Suffolk) would therefore not pay any regard to these. Surely the point of advertising is to draw the attention of *all* affected people to what the proposal actually is and to attract their engagement. Their newspaper adverts did no such thing. Sunnica also claimed during one of their webinars that they ran a paid Facebook campaign resulting in several thousand page impressions – but we are not aware of any of the village FB community pages getting any 'hits,' so it's unclear who the recipients actually were.
- No physical advertising in the form of posters and banners was available in the villages until Freckenham Parish council requested these 5 weeks into the consultation. Even then, only 1 small banner was sent per village. More banners/ posters/ placards etc were needed to draw attention to the consultation – one solitary banner per village has practically no impact. And by the time the banners arrived and were put in place we were in a second national lockdown, meaning that residents were not moving around the villages, so didn't see them. The banners also had incorrect dates on them, which were never changed. The use of banners agrees with the adopted West Suffolk Council Statement of Community Involvement on "Line of sight publicity" as recommended by Advice Note 2 from the Planning Inspectorate, Section 5.3 "A local authority's adopted Statement of Community Involvement (or Community Involvement Scheme in Wales) is likely to have a bearing on its response to the developer's SoCC Consultation."

[REDACTED]

[REDACTED]

- The lack of effective advertising limited the awareness of the consultation, which was reflected in the lack of engagement in online activities such as the webinars (where fewer than 20 connections were made for webinars on the 1st and 3rd October 2020). Sunnica could have advertised in the local village publications and community social media pages – they chose not to do this. A second round of consultation is required to allow proper advertising in the press as detailed in the Statement of Community Consultation, as well as community publications and social media platforms, in order to allow more of the affected residents to engage properly with the consultation.

No Means of Tracking Consultation Response/ Ensuring that Questionnaire Responses Actually got to Sunnica

- Consultation responses that were submitted via the paper questionnaire were not traceable. The questionnaires were not numbered/ coded, so there is no way of gauging gaps in responses or issuing receipts to confirm they arrived at the Sunnica address. Consultation responses submitted via the online questionnaire also had no confirmation/ acknowledgement of receipt, which is normal practice for online surveys. It would have also been useful for those submitting online to receive a confirmation copy of what they had submitted. This means that residents have no way of knowing if their views have even made it to Sunnica. A second round of consultation is needed with better traceability of the responses so that residents can be assured that their comments have been included in the consultation report.

Statement of Community Consultation (SoCC)

- Mistakes and misleading information in the SoCC and in newspaper adverts (see also previous notes on advertising). Scheme advertised as, “Sunnica Energy Farm is a proposed new solar energy farm and battery storage facility connecting to the Burwell National Grid Substation in Cambridgeshire.” No mention of the size and scale. No mention of location. No mention at all of Suffolk – only Cambridgeshire. So residents in Suffolk unlikely to take much notice.
- Mention of previous solar projects by Tribus/PS renewables is misleading (e.g. Oakfield and Eveley, which are on a totally different scale at 3.3 MW and 49 MW, respectively). Implies that this new scheme is of a similar ilk. SoCC also mentions that it is a NSIP as it exceeds 50 MW...but it doesn't say by how much. 500 MW is a significant 'leap' from what a 'typical' solar farm output is considered to be (the ones in this area are between 5 and 38 MW). The purpose of a description/ advert is to draw the attention of the public to what the scheme actually is. It needs to adequately reflect what is being proposed. The misleading descriptions in the SoCC and adverts do not do this. By way of an analogy, it is like a council advertising a 'housing development with associated infrastructure' when they really mean to build a whole new town.
- In the SoCC it states that there are “two battery energy storage systems” – but three were included in the plan.
- It specifically states in SoCC that locals will be asked to consult on: Operational impacts, Impacts from decommissioning - but there is negligible information provided on these.

Sunnica instead stated during a webinar that it's decommissioning plan will be put together 6 months prior to decommissioning taking place, so they had very little detail at this stage. How are we, therefore, expected to consult on this? Not even a 'worst-case' scenario was provided. No details about how it might be decommissioned, which parts are likely to be decommissioned, no detail at all on how the land is meant to be restored to "it's previous condition" (which is unlikely given the potential soil damage resulting from this massive scale construction project). How are people meant to form a view of the legacy we will be left with after this scheme ends with no detail provided on which to consult?

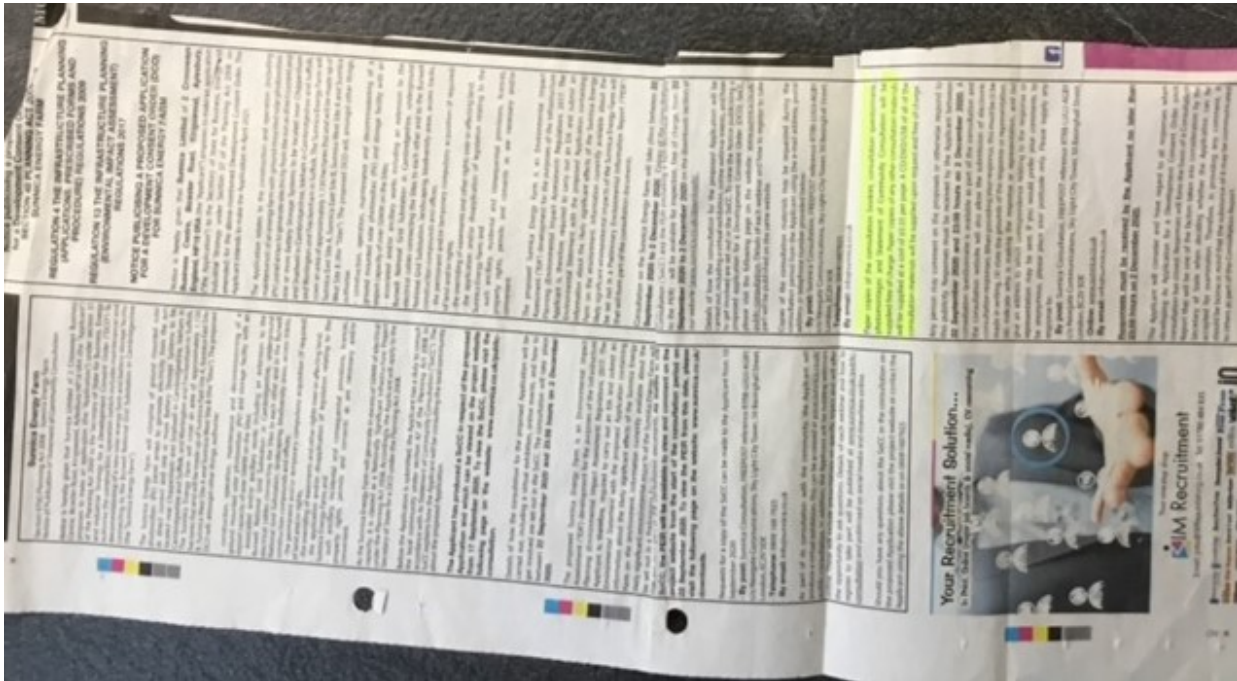
- In the SoCC it also specifically states that the public will be asked for views on the PEIR. As mentioned previously, this was not made available to all residents, so how can they be consulted? Sunnica said the PEIR was too big to put onto DVD, so anyone without a computer/ internet access cannot see it. In the SoCC it states that hard copies will be available on request – but at a charge of 35p per sheet as mentioned previously. This is discriminatory. Sunnica was requested multiple times in the webinars to provide hard copies of the PEIR in the villages....but this was not honoured. Chippenham and Freckenham got partial copies (the main document, but none of the supporting appendices). Isleham and Snailwell did not receive any hard copy at all. And even if the villages did receive a partial hard copy, it was close to/ during the 2nd national lockdown and couldn't be accessed. This document is a key part of the consultation and should have been made available in villages right from the very beginning of the consultation period. The Planning Inspectorate "Guidance on procedural requirements for major infrastructure projects" suggests, "*Applicants should engage proactively with local authorities and local communities to find alternative means to provide access to the documentation where required, to ensure on-going fair participation in the planning process, for example by providing copies of documents on a USB flash drive where parties have access to a computer but have limited or no internet access or, where reasonably practicable, by making copies of documents available for inspection free of charge where a person is unable to access the documentation electronically or finds it difficult to do so.*"

Complaints

- ECDC councillors have already complained about the "woefully inadequate and laughable" consultation ([East Cambridgeshire District Council - YouTube](#) relevant meeting, Sunnica starts about 2 hours in [East Cambridgeshire District Council, Planning Committee 2nd September 2020 - YouTube](#)
- [Say No To Sunnica - YouTube](#) – WSC Councillor describes the consultation as 'farcical' (listen to 3.01 mins)
- Despite claims in the SoCC, ECDC councillors said that 3 Cambridgeshire Parish Councils that are directly affected by the scheme have had NO direct contact from Sunnica. (Ely Standard Newspaper article Sept 2020: ECDC councillors ['Man up' and start talking energy firm told](#)).
- Suffolk councillors requested further information so that people can make an informed assessment of the scheme. Comments such as, "At this stage of the process we have many questions to which the answers are not entirely clear, so it's appropriate at this stage to take these issues to the developer." And, "The sheer scale of the project means its impact will be significant and very far-reaching ([REDACTED])
- Freckenham Parish Council – sent letter to Sunnica on 9th Oct outlining many concerns about the inadequacy of the consultation. Sunnica declined to offer additional support for

most of the concerns raised ([9.10.20-Sunnica-stat-consultation-complaint.docx.pdf](https://www.suffolk.cloud/9.10.20-Sunnica-stat-consultation-complaint.docx.pdf))

Example of newspaper advertising. Newmarket Journal – small print at back of paper



Example of 'Panel Ad.' Bury Free Press

Public consultation
22 September 2020 – 2 December 2020

Sunnica Energy Farm is a proposed new energy farm with solar photovoltaic (PV) and energy storage infrastructure connecting to the Burwell National Grid Substation in Cambridgeshire.

Find out more

You can find out more about the proposals and how to respond the consultation by:

1. Going to our website, sunnica.co.uk/public-consultation
You can view all the documents we are publishing as part of the consultation as well as a virtual public exhibition there.
2. Contacting us to request a copy of a booklet summarising the proposals and a consultation questionnaire.
3. Viewing a series of webinars we will give about the proposals online. These will offer the opportunity to ask questions about the proposals. You can find a list of all the webinars and register to take part at sunnica.co.uk/public-consultation
4. Booking an appointment to speak to the project team individually. You can book the appointment using the contact details in this advert.
5. Contacting us directly using the details below.

Contact us
For further information, please go to sunnica.co.uk or contact us on info@sunnica.co.uk or 08081667925.

Alternatively, you can write to us at: Sunnica Consultation, FREEPOST reference RTM8-LULU-AGRY, c/o Newgate Communications, Sky Light City Tower, 80 Beaulieu Street, London, EC2V 8DE





Jadi Coe
Clerk, Freckenham Parish Council
By email: freckenhamparishclerk@hotmail.com

15 October 2020

Dear Jadi,

Sunnica Energy Farm

Thank you for your letter dated 9 October 2020 regarding the current consultation on our proposals for Sunnica Energy Farm. Like you, we want as many people as possible to respond to the consultation and are grateful to Freckenham Parish Council for its suggestions on how we could engage local people.

Approach to consultation

We do not, however, agree that the current consultation is flawed in the manner set out in the Parish Council's letter. This project is considered a nationally significant infrastructure project and there are consultation requirements set out in statute which we are required to comply with - failure to do so would mean that the Secretary of State would not accept our application for development consent when the application is made next year.

We have set out our approach to consulting with the local community in a Statement of Community Consultation. This was developed through extensive engagement with Cambridgeshire County Council, East Cambridgeshire District Council, Suffolk County Council and West Suffolk Council. We considered these councils' Statements of Community Involvement in developing the Statement of Community Consultation.

We believe that the approach set out in the Statement of Community Consultation allows for effective and appropriate consultation while complying with Government guidance about COVID 19. While we are consulting in accordance with the Statement of Community Consultation, we will consider all reasonable suggestions for other consultation activities which would help the local community engage with the consultation process.

The Statement of Community Consultation includes a consultation period significantly longer than the statutory minimum of 28 days and this formed an important part of our discussions with the councils. We are still early in this period and do not believe we need to extend the consultation period to accommodate any additional consultation activity we might carry out on a voluntary basis.

Physical events

We carefully considered whether it would be possible to hold physical public exhibitions in developing our Statement of Community Consultation. We agree that they are a useful consultation tool – that is why we included public exhibitions in our non-statutory consultation last year.

Given the interest in the proposed Sunnica Energy Farm, we concluded that we would not be able to arrange physical public exhibitions in a way that we felt was compatible with current Government guidance regarding COVID 19. The Statement of Community Consultation therefore sets out a consultation programme designed to allow people from across the community to respond while complying with Government requirements in relation to COVID 19.

We recognise that people living in the Parish may not be able or comfortable with online engagement methods. That is why we sent a copy of the consultation booklet along with the consultation questionnaire and a pre-addressed Freepost envelope to all addresses within the Parish, as well as advertising the consultation in print newspapers locally.

We are also offering telephone surgeries for people who would prefer to ask questions about the project this way and have included details of our Freephone telephone number in all consultation materials. If the Parish Council is aware of parishioners who would benefit from additional support in responding to the consultation, we would be happy to work together to provide this.

We do set out that we would consider holding public exhibitions on a voluntary basis if the COVID 19 alert level set by the Government is changed to 1 or 2 by 27 October 2020. We have set this as the date because it would allow us to organise the events before the end of the consultation period. We would consider whether there was any need to extend the consultation period to allow for additional events when scheduling them.

Consultation materials

We do not agree with the Parish Council's comments regarding the consultation booklet. To date, we have had a higher level of response to the consultation than at the same stage of the non-statutory consultation. Distributing the booklet, questionnaire and pre-addressed Freepost envelope to addresses in Consultation Zone 1 has been an effective means of enabling people in the local area to respond to the consultation.

We will send a copy of the consultation booklet, questionnaire, and pre-addressed Freepost envelope, as well as physical copies of the plans in the consultation booklet, to anyone who requests them. We are also happy to provide large print copies of the booklet on request. The £0.35 per page charge you refer to applies specifically to the PEIR and not to other documents such as large print copies of the booklet. We have been in touch with the Parish Council separately, as we have with others, to offer to provide a hard copy of the PEIR for people living within the Parish to access. This



access would need to be subject to measures to ensure that access to the hard copy documentation is carried out in compliance with the Government's COVID-19 measures in place at the time.

On the basis of the above, we do not believe there is a need to extend the consultation period to allow for them to be provided.

Consultation publicity

We publicised the consultation widely in accordance with the Statement of Community Consultation. This included sending a copy of the consultation booklet, questionnaire and a Freepost envelope to all addresses in Consultation Zone 1, writing to elected representatives in Consultation Zone 1 with details of the consultation, and advertising the consultation online and in the local media.

This includes adverts placed in the paper editions of the *Eastern Daily Press* and the *East Anglian Daily Times* on 23 September 2020, the *Cambridge News* on 24 September 2020, *Bury Free Press* on 25 September 2020 and the *Ely Standard* and *Newmarket Journal* on 1 October 2020. I have enclosed proof of publication for each of these publications with this letter.

We are happy to take the Parish Council's advice that a banner would be a helpful addition to the publicity measures set out in the Statement of Community Consultation. We would be happy to provide a banner to the reasonable specifications provided by the Parish Council. This would be a voluntary addition to the activity in the Statement of Community Consultation.

Webinars

The webinars we have organised as part of the consultation include a presentation from relevant members of the project team and a Q&A session. The presentations are not pre-recorded as this allows us to respond to issues and questions raised during the webinar at the time.

We have adopted the Q&A format used in the webinars because it allows for people to seek answers while maintaining their privacy. This is important given that recordings of the webinars are being placed on our website. Over the course of the webinars to date, we have answered more than 250 questions about the proposals. Anyone wanting a more detailed discussion can arrange an appointment to speak with us by telephone.

The scheduling of the webinars allows consultees to consider them in their response. We are repeating each of the webinars live. Recordings of a webinar on each topic being covered will be placed online, which are due to be completed more than 28 days before the close of consultation.

Anyone who wishes to contact us with a question ahead of that point can do so using the Freephone number, email address or Freepost address included in consultation materials.

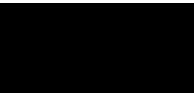
Conclusion

We are consulting in line with the Statement of Community Consultation, as we are obliged to do by the relevant legislation. We believe that the consultation process set out in the Statement of Community Consultation is robust and will enable the local community to communicate their views of our proposals. The consultation period is significantly longer than the statutory minimum of 28 days. While we are happy to consider additional voluntary activities on their own merits, we do not believe there is a need to extend the consultation period to accommodate these.

We are aware there are outstanding matters from the Parish Council's email of 21 September 2020 and will respond on those separately. We responded to questions posed ahead of the briefing with the Parish Solar Alliance of 15 July 2020 at that briefing. We also sought a meeting with the Parish Council, alongside other parish councils, to discuss the issues raised in its response to the non-statutory consultation following that consultation. While this did not occur, we have had subsequent engagement with the Parish Council via the Parish Solar Alliance and do not intend to respond separately in writing at this stage.

We would be very happy to meet with the Parish Council online to discuss any of the above in further detail. Please do get in touch with any questions using 0808 168 7925 or info@sunnica.co.uk.

Yours sincerely,



Luke Murray
Sunnica Ltd

From: Nick Harvey [REDACTED]
Sent: 19 November 2021 17:27
To: NI Enquiries <NIEnquiries@planninginspectorate.gov.uk>
Cc: HANCOCK Matthew [REDACTED]
Subject: Sunnica Energy Powerstation

Dear Sir/Madam,

I notice that the DCO application has now been submitted. As I understand it you have 28 days to decide if this application will be accepted and one of the things you will consider is if the consultation was adequate.

I am writing to explain briefly that the consultation was not adequate so the application should not be accepted.

The main reason for saying this is that the format of the statutory consultation was curtailed by Covid restrictions and hence "Zoom" type meetings were used as the main core of consultation. These meetings were not the full meeting that Zoom is capable of but simply a chance to put written questions. The answers to these questions were given with no "two way" communication; so inconsistencies, errors, follow on or subsequent points or supplementary questions were at best out of context and at worst entirely missing. The video of these meetings are available on the Sunnica WEB site but no record of the written questions and hence the relevance or timeliness of the answers is available.

Also the applicant has a duty to take full note of the consultation and this clearly cannot and has not been done as the questions and comments were answered piecemeal rather than in a wholistic and complete way.

I am happy to explain in more detail but wanted to make this point ASAP after the application was made.

Please reject the application

Copy to MP Matt Hancock MP who with Lucy Fraser MP are two of the many objectors to the scheme.

Best Regards
Nick Harvey

[REDACTED]



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The statements expressed in this e-mail are personal and do not necessarily reflect the opinions or policies of the Inspectorate.

DPC:76616c646f72



From: [REDACTED]
To: [Sunnica Energy Farm](#)
Cc: alok.sharma.mp@parliament.uk
Subject: Lack of consultation - Sunnica
Date: 22 November 2021 10:08:46
Attachments: [Sunnica inadequacy of consultation letter November 2021.docx](#)
[0408 Mayor Sunnica Sept 2021.docx](#)

Dear Sir/Madam

Please find attached a letter from Isleham Parish Council which we trust will be considered as part of the pre examination process for the Sunnica planning application.

Kind Regards

Richard Liddington

Clerk to Isleham Parish Council

ISLEHAM PARISH COUNCIL

Clerk: Richard Liddington



E mail: islehampc@gmail.com

Mr A Sharma MP
The Planning Inspectorate
Temple Quay House
Temple Quay
Bristol
BS1 6PN

22nd November 2021

re Sunnica

Dear Mr Sharma

The following is a copy of a letter sent to our local MPs Lucy Frazer and Matt Hancock in September 2021, which we are hoping will be considered by the Inspectorate Department as part of their pre examination stage.

I am writing on behalf of Isleham Parish Council to emphasize our continuing disappointment at the lack of consultation undertaken by Sunnica as part of their forthcoming application to construct an enormous solar farm, some of which falls within this parish.

Sunnica have repeatedly failed to respond to our requests to hold formal meetings with residents of this parish, preferring to simply rely on written brochures which contain confusing information, maps and lack of reference points for example the maps on pages 9 & 11 of their consultation booklet dated 21st September 2020.

The subsequent newsletter from Sunnica, received by residents in late August 2021 makes what we believe to be a number of false / misleading statements. These include their claims that:

1. They have engaged with a wide range of relevant agencies.

Comment: While that may be partly true, Sunnica have still completely refused to consult directly with the residents of this parish.

2. They ‘have spent .. additional time considering the feedback that we received during the consultation and carrying out additional engagement and survey activities’

Comment: Although we are obviously still to see their formal consultation report there is little optimism amongst members of this Parish Council’s that this will reflect any of the significant (Sunnica’s choice of words!) concerns raised by residents towards their proposal.

3. Changes were made to sites south of Isleham as a result of the consultation process.

Comment: Our understanding is that these changes were made as a result of the relevant landowner changing their mind over the sale / lease of the land, not the consultation process!

Also, although there is some reduction in the total area included in site 1, the actual proximity of the nearest panels to the village remains unchanged!

4. These areas will now provide additional habitat for stone curlews and other nesting birds. (pg 2)

Comment The additional habitat suggested in this newsletter only relates to their initial proposals. The new proposals for the location of the solar PV array in this area is actually on land previously shown as native grassland planting. The net results of these new proposals is therefore a reduction in the overall habit for these birds, not an increase!

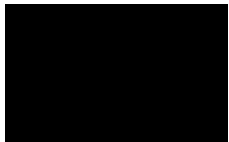
5. They have been in targeted consultation with landowners potentially affected by changes to the Order Limits.

Comment: We believe from dialogue with some of these parties that the information provided by Sunnica to these landowners is extremely nominal and can't therefore be considered as "effective consultation"

As stated above, it is not easy to draw comparisons from this newsletter with the original proposals due to the scale of the maps issued. This is particularly true in relation to Site 2 around Worlington

Finally, we would also like to draw to your attention the attached letter from Dr Nik Johnson Mayor for Cambridge and Peterborough which reflects many of our previously expressed concerns.

Yours sincerely



R. Liddington
Parish Clerk



**CAMBRIDGESHIRE
& PETERBOROUGH**
COMBINED AUTHORITY

Date: 15 December 2021
Telephone: 01353 667721
E Mail: Nik.Johnson@cambridgeshirepeterborough-ca.gov.uk

The Right Honourable Robert Jenrick,
Secretary of State,
Ministry of Housing, Communities and Local Government

The Mayor's Office
72 Market Street
Ely
CB7 4LS

Dear Minister,

SUNNICA ENERGY FARM PROPOSAL

I am writing to express my concerns over a proposal to establish a huge solar farm within Cambridgeshire. This is due to be submitted this year as a Nationally Significant Infrastructure Project for your decision.

My predecessor wrote in response to the pre-submission consultation on the Sunnica Energy Farm that the project needed to be "*exemplary in avoiding detrimental impacts*". Having looked myself at the proposals and spoken to residents I am extremely concerned about the impacts this proposed development would have and cannot support it.

I am supportive of the role that solar farms can play as part of delivering renewable energy supply and recognise the attractiveness of Cambridgeshire and Peterborough to the solar farm market. Indeed, there are already a number of solar farms operating in the area. However, this project dwarfs those schemes covering the equivalent of 900 football fields with its output equal to a third of all the current UK installed capacity on large (>25MW) solar sites.

Such a scale of development is inappropriate in the location proposed, given its proximity to 13 local villages and would result in the loss productive farmland rather than being located on brownfield sites. This is borne out by the Preliminary Environment Report that identified even after mitigation there would be "major adverse" impacts on environmental aspects, such as landscape, and adverse impacts during its long construction. Residents are rightly opposed to this proposal on those grounds.

My residents have expressed concerns not just over visual and amenity aspects highlighted in the Report, but the safety implications of the significant battery storage facilities in the event of a fire. It appears that concerns about the technical risk and impact of battery fires that on the scale of the proposed development would release highly toxic chemicals into the local environment, along with the risk of potential explosion have not been fully addressed with residents. I would ask that you give this aspect particular attention in considering the suitability of the proposal. As a Doctor one of my priorities is to ensure protection and enhancement of public health and my residents deserve to be satisfied that this proposal won't expose them to any future health risks.

There are suggestions from my residents that the statutory consultation was inadequate, particularly due to some late boundary changes around Isleham after a landowner withdrew support for the scheme resulting in late changes by Sunnica, upon which residents may not have

The Mayor's Office,
72 Market Street,
Ely, CB7 4LS

had the opportunity to fully appreciate and therefore comment on the change. Consultation meetings only seem to have been conducted electronically, effectively excluding those without access to the technology and there are suggestions that not all questions from the electronic engagement were answered.

I will appreciate if you can factor in the concerns I am raising when considering a future decision.

Yours Sincerely,



Dr Nik Johnson
Mayor of Cambridgeshire and Peterborough



FRECKENHAM PARISH COUNCIL

Jadi Coe
Clerk to the Council

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
freckenhamparishclerk@hotmail.com

Luke Murray
Director
Sunnica Limited
2 Crossways Business Centre
Bicester Road
Kingswood
Aylesbury
HP18 0RA
info@sunnica.co.uk

9th October 2020

Dear Mr Murray,

Please find below a number of concerns about the current Statutory Consultation noted by Freckenham villagers and reported to Freckenham Parish Council. We welcome the opportunity to discuss these points with you, however our position is that the current consultation is flawed in a number of key respects. Overcoming these flaws will require changes and a significant extension to the consultation period. Given that any extension to the consultation would bring the end date towards Christmas 2020, Freckenham Parish Council requests that the consultation is extended until at least the 31st January 2021, or ten weeks after the issues are resolved if later. Our concerns are as follows:

Physical consultation events

- The lack of physical consultation events is excluding many villagers who would otherwise engage with the consultation. Freckenham and surrounding villages are able to hold community events such as monthly outdoor Farmers Markets and the recent Freckenham Neighbourhood Plan consultation event (26th September) while complying with Government COVID-19 safety guidelines. It should be possible for Sunnica to design a safe event for each village.
- Freckenham has a high proportion of villagers who are not confident in accessing online materials or webinars, who are hence excluded from the opportunity to ask questions or view the scheme in sufficient detail. Villagers are also reporting difficulties with the consultation booklet (see below) and would much prefer to see maps at large scale. The population profile of Freckenham shows that 25.4% of villagers are over 65, a higher proportion than the national average of 18.4% (ONS 2019, see

- [REDACTED]
[REDACTED]
- The Statement of Community Consultation page 16 details the process for beginning consultation events, but the decision point at the 27th October 2020 and the two-week notice period mean any events would not start until mid-November. With only two weeks until the consultation closes on 2nd December 2020, Freckenham Parish Council believes the consultation closing date should be significantly extended. This would allow more time for villagers to visit an event, consider the scheme and how it affects them, and make a meaningful consultation response.
- [REDACTED]
[REDACTED]

The Consultation Booklet

- Villagers are reporting problems reading and understanding the consultation booklet which is negatively affecting their ability to engage with the consultation. They report:
- Maps on pages 7, 9, 11, 17, 21-24 are scaled for A3, but reduced to less than A4. Many villagers report these maps are too small for them to read. The incorrect scaling for the printed page size means that they cannot measure any distances on the map and correctly interpret them, for example the width of Native Grassland Planting or distances from their homes to the edge of the scheme. Certain maps such as Sunnica East Site A and B Parameter Plan on page 9 show no village names, road names or other landmarks, meaning they must be read in conjunction with other maps which is difficult for people to manage given they may also be using magnifying lenses. All these points mean that larger format maps are required for many villagers to comprehend the boundaries and features of the scheme
- Consultation booklets were delivered in plain white envelopes addressed to “The Resident” without any mention of Sunnica on the outside (including the return address). People may have mistaken them for unwanted marketing materials and discarded them. This point was raised in Freckenham Parish Council’s response to the Non-statutory Consultation
[REDACTED]
- The instructions on booking an individual appointment to speak to a member of the Sunnica staff is located on the back of the booklet, in small point type. The use of small typefaces was raised in Freckenham Parish Council’s response to the Non-statutory Consultation
[REDACTED] For those with a visual impairment, knowledge about telephone appointments is effectively hidden. A statement at the front of the booklet, or in other advertising, would have been much more effective in ensuring appointments were accessible to those who need them.
- Given the above points about the Consultation Booklet, Freckenham Parish Council believes that the consultation end date should be extended to allow time for large print maps and consultation materials to be made available to those requiring them. Villagers requiring these items could make themselves known to Sunnica through contact with Parish Councils and other relevant organisations in Consultation Zone 1. The large print maps should be made available free of charge: in our view it would be discriminatory to apply the £0.35 per page printing fee mentioned on the reverse of the consultation booklet.

Advertising the consultation

- The Statement of Community Consultation Table 3 states that the consultation will be publicised in local newspapers including the Newmarket Journal and the Bury Free Press. There are no advertisements of the type used during the non-statutory consultation in the paper editions of the Newmarket Journal dated 10th, 17th, 24th September and 1st October, nor in the Bury Free Press dated 2nd October.
- Freckenham Parish Council submitted a written question to the 21st September briefing requesting a single large banner advertising the consultation for display in a prominent position in villages directly affected by the scheme. The question was mentioned during the briefing, but no response has been made. The use of banners agrees with the adopted West Suffolk Council Statement of Community Involvement on “Line of sight publicity” (Table 1) as recommended by Advice Note 2 from the Planning Inspectorate, Section 5.3 “A local authority’s adopted Statement of Community Involvement (or Community Involvement Scheme in Wales) is likely to have a bearing on its response to the developer’s SoCC Consultation.”
 - [REDACTED]
 - [REDACTED]
- The lack of effective advertising has limited awareness of the consultation in progress, and this is shown in the lack of engagement in online activities such as the webinars, where fewer than 20 connections were made for webinars on the 1st and 3rd October 2020. Freckenham Parish Council believes the consultation end date should be significantly extended while proper advertising in the press is carried out as detailed in the Statement of Community Consultation, allowing villagers time to engage properly with the consultation.

Webinar format

- The consultation webinars provide a means for villagers to have an audio-description of the scheme as it affects them. It isn't clear why the 30-minute presentations weren't recorded up-front, since they could have been made available as soon as the consultation opened, maximising the time they were available. A villager wishing to hear the webinar on Construction and Operations would need to wait almost one month from the start of the consultation until the webinar is available. The webinar format could have focussed on the questions and answers, with the presentation inset at the start if required. However, the format of the question and answer session is currently inadequate, as there is no facility for a meaningful dialogue between the people asking and answering a given question. The open audio format used during the Parish Solar Alliance briefings on the 15th July and 21st September 2020 was much more effective in promoting an open dialogue on the points raised.
- Freckenham Parish Council believes that the webinar presentations should be made immediately available online, and the consultation extended to allow villagers time to consider the webinars, utilise the question and answer sessions and make their responses to the consultation.

In conclusion, Freckenham Parish Council hasn't received any written responses from Sunnica to written questions previously submitted. Still outstanding are responses to Freckenham Parish Council's response to the Non-statutory Consultation, and written questions submitted by email to the 15th July 2020 and 21st September 2020 briefings. We look forward to written responses to these submissions and, more importantly, to the points raised in this letter.

Yours sincerely



Jadi Coe
Clerk to the Parish Council

From: [REDACTED]
To: [Sunnica Energy Farm](#)
Cc: alok.sharma.mp@parliament.uk
Subject: Lack of consultation - Sunnica
Date: 22 November 2021 10:08:46
Attachments: [Sunnica inadequacy of consultation letter November 2021.docx](#)
[0408 Mayor Sunnica Sept 2021.docx](#)

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Kind Regards

Richard Liddington

Clerk to Isleham Parish Council

ISLEHAM PARISH COUNCIL

Clerk: Richard Liddington



Tel: [REDACTED]

E mail: islehampc@gmail.com

Mr A Sharma MP

The Planning Inspectorate

Temple Quay House

Temple Quay

Bristol

BS1 6PN

22nd November 2021

re Sunnica

Dear Mr Sharma

The following is a copy of a letter sent to our local MPs Lucy Frazer and Matt Hancock in September 2021, which we are hoping will be considered by the Inspectorate Department as part of their pre examination stage.

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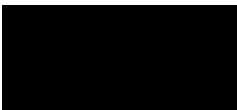
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Finally, we would also like to draw to your attention the attached letter from Dr Nik Johnson Mayor for Cambridge and Peterborough which reflects many of our previously expressed concerns.

Yours sincerely



R. Liddington
Parish Clerk



**CAMBRIDGESHIRE
& PETERBOROUGH**
COMBINED AUTHORITY

Date: 15 December 2021
Telephone: 01353 667721
E Mail: Nik.Johnson@cambridgeshirepeterborough-ca.gov.uk

The Right Honourable Robert Jenrick,
Secretary of State,
Ministry of Housing, Communities and Local Government

The Mayor's Office
72 Market Street
Ely
CB7 4LS

Dear Minister,

SUNNICA ENERGY FARM PROPOSAL

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Yours Sincerely,



Dr Nik Johnson
Mayor of Cambridgeshire and Peterborough



From: [REDACTED]
To: [Sunnica Energy Farm](#)
Subject: Sunnica Energy Farm - Adequacy of Consultation
Date: 22 November 2021 13:57:51
Attachments: [Adequacy of Consultation letter July 2021.pdf](#)
[Final Report Sunnica - Statutory Consultation Survey.pdf \(1\).pdf](#)
[Parish Councils Alliance - Sunnica Group - Inadequacy of statutory consultation bullets.pdf](#)

Dear Sir, please find attached a copy of Chippenham Parish Council's letter, originally addressed to our principal authority, outlining the council's concerns on the lack of an adequate consultation for the Sunnica Energy Farm NSIP planning application. This letter is supported by the results of a village-wide survey and also a bullet list of key concerns. This list was put together by our Parish Council Alliance which is made up of representatives from the majorly affected parishes impacted by the Sunnica proposal and reflects concerns for the wider area.

We ask that this information be taken into consideration when the Inspector assesses whether an adequate consultation process has been carried out.

Yours

Sally Hughes

Clerk

Chippenham Parish Council

CHIPPENHAM PARISH COUNCIL



PARISH CLERK: MRS SALLY HUGHES
CHIPPENHAMPARISHCOUNCIL@HOTMAIL.COM

21st July 2021

Andrew Phillips
Planning Dept
East Cambridgeshire District Council
Nutholt Lane
Ely
CB7

Dear Andrew

Sunnica Statutory Consultation

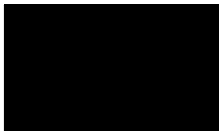
Chippenham Parish Council would like to inform you that they still find that Sunnica's Statutory Consultation was inadequate and request that this letter and accompanying documents are shared with the Planning Inspectorate as part of the Council's "Adequacy of Consultation" representation during the Acceptance phase. This request is per paragraph 7.1 of the Planning Inspectorate's Advice Note 2 "The role of local authorities in the development consent process".

Chippenham Parish Council engaged with Sunnica during the Statutory Consultation in an attempt to raise concerns while the consultation was still underway, but found the response from Sunnica did not address the concerns raised.

Chippenham Parish Council is a member of the Parish Councils Alliance - Sunnica Group, and endorses the list of inadequacies found by this group. A copy of the list is attached.

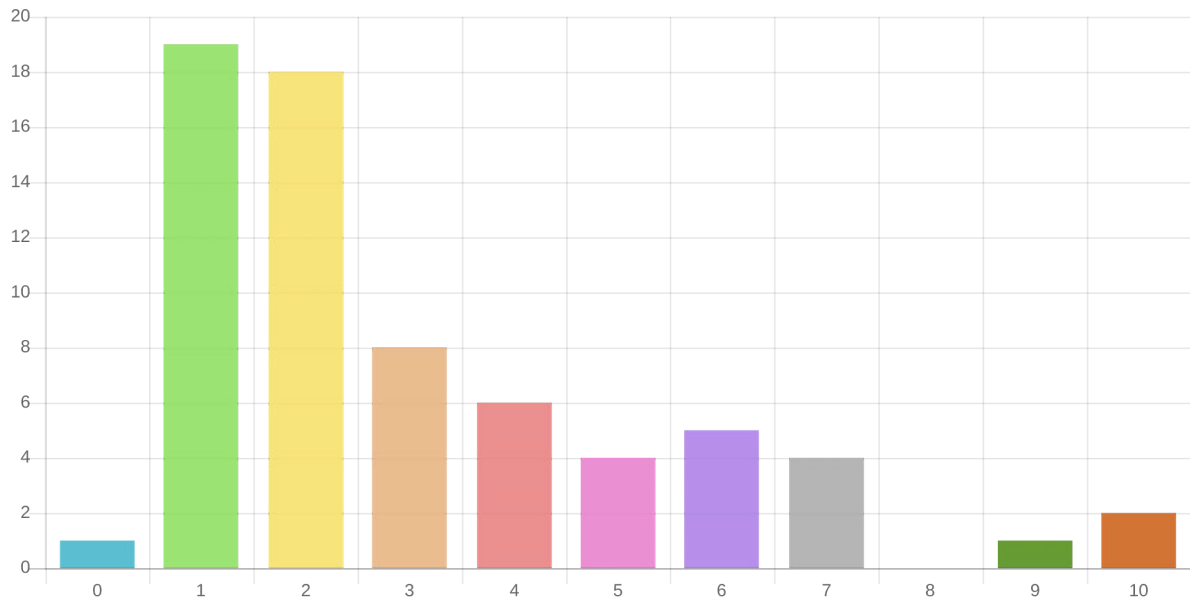
Finally, Chippenham Parish Council carried out a household survey within Chippenham on the Sunnica Statutory Consultation, using four standard questions supplied by the Parish Councils Alliance, Sunnica Group. The survey results and comments raised are attached.

Yours faithfully



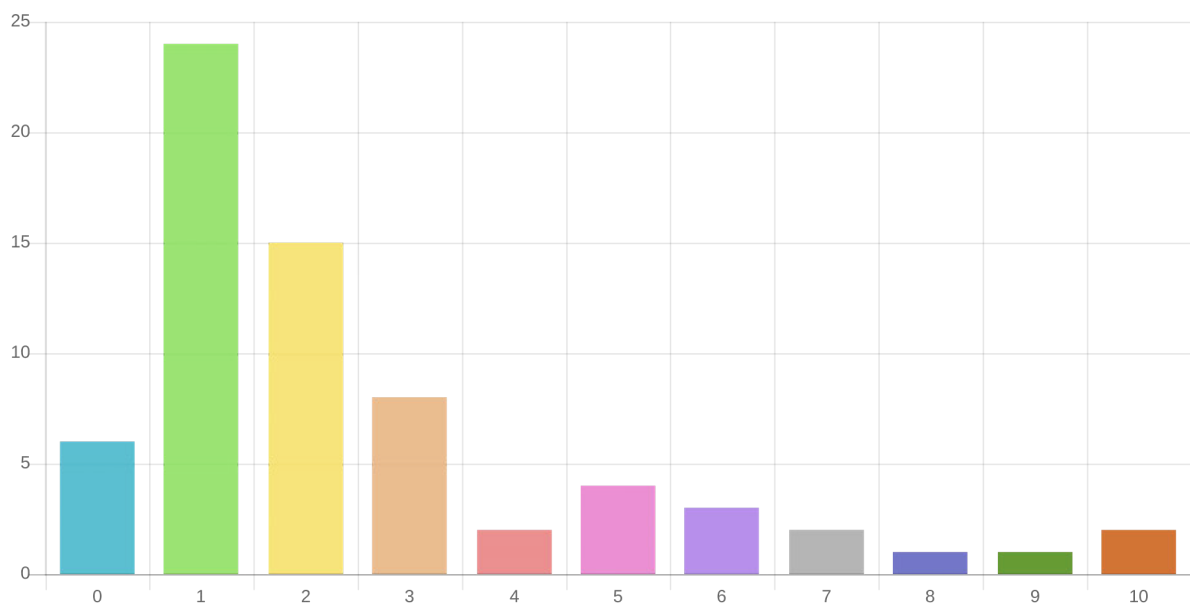
Sally Hughes
Clerk
Chippenham Parish Council

2 The information supplied was easy to understand



	0	1	2	3	4	5	6	7	8	9	10	Standard Deviation	Responses	Weighted Average
Strongly Disagree - Strongly Agree	1 (1%)	19 (28%)	18 (26%)	8 (12%)	6 (9%)	4 (6%)	5 (7%)	4 (6%)	0 (0%)	1 (1%)	2 (3%)	6.24	68	3.09 / 10
														3.09 / 10

3 The online exhibition, webinars and contact arrangements meant questions could be raised and answered



	0	1	2	3	4	5	6	7	8	9	10	Standard Deviation	Responses	Weighted Average
Strongly Disagree - Strongly Agree	6 (9%)	24 (35%)	15 (22%)	8 (12%)	2 (3%)	4 (6%)	3 (4%)	2 (3%)	1 (1%)	1 (1%)	2 (3%)	6.87	68	2.57 / 10

5 If you wish to add any comments on the consultation process then please do so in the box below.

A lack of information provided by Sunnica has made it extremely difficult to feel that concerns have been acknowledged or considered by Sunnica

The concerns raised over unstable batteries have not been sufficiently addressed by Sunnica.

Whether they have consulted or not, they have not changed my opinion on the best use and most appropriate use of the land. I do not believe that productive agricultural land should be covered in solar panels, it should be used to grow food crops to improve the sustainability of the UK food supply chain

Consultations have been deliberately misleading and done nothing to reassure locals or even answer their questions.

Question 3 - simply not correct. Answers were rarely given fully. At no point has Sunnica made understanding any part of the NSIP application easy to understand

Questions could not be raised and answered. They were very selective. Question 5 - not at all.

Appalling, few questions were meaningfully answered. Inaccessible for many. Absence of vital information on which to consult; exact site boundaries, true scale, decommissioning, detail of archeological and biodiversity information they have found, disruption of construction, compensation. Total one way dialogue from Sunnica.

Never addressed the size issue or how this misuse of agricultural property fits with the government's post Brexit strategy for agriculture. Or the fact that the land identified is labelled as 'lower quality'. Nor did they comment on how or if it was possible to reduce the impact on local village traffic. Also, there has been no comment made about the impact on public rights of way - footpaths, bridleways, green lanes.

I feel that this has all been an underhanded, one-sided consultation in favour of Sunnica. How despicable that surveyors are already out digging proposed sites, even before permission has actually been granted. This proposal is, in my view, very unfair. The size of it is far too large for one area to cope with. I am all for moving forward with the times, therefore I think something on a much smaller scale would have been more acceptable with the majority. [REDACTED] I only hope we are still not too late to be heard. I am deeply resentful and untrusting of anything Sunnica. From a very concerned resident.

I was able to read the booklet/online information supplied by Sunnica. However, the information was incomplete, based on outcomes for which there is no current precedent, and in many cases deliberately vague and extremely misleading. My own questions raised with Sunnica have not been answered. Therefore the consultation process itself, lack of comprehensive information and of answers/clarification to my queries subsequent to it, has not helped me to respond to the proposal. I am computer literate and have online access; many of those whose views are important may not have been able to access and participate in an online consultation.

Need to involve people who do not use Zoom. Not many of the webinar questions were properly answered sadly.

TBH it isn't even clear that there is a consultation occurring!

Consultation online doesn't work. Sunnica had control of the meetings due to being online, which meant a true picture of the communities thoughts couldn't be obtained. The consultation process should have been delayed until physical meetings could happen.

This is a welcomed proposal.

Not enough engagement to allow members of the public who will be affected by this scheme to fully engage and understand its impact.

Maps were not easy to comprehend. Large amount of detail lacking.

This is a massive project, with a lot of detailed information available. To expect individuals to be able to assimilate this is unrealistic. To expect individuals to be able to challenge it is also realistic, even if the mechanisms are available. I have read and understood parts of the information (where I have a particular interest) and found it simplistic and inaccurate- this leads me to doubt the accuracy of the rest.

Whilst I saw the online and booklet, I was unaware of the webinars by Sunnica. But looking back at their times, I would have been unable to attend due to work, leaving me with no way to add my opinions. It also shuts out people who are unable to use video calls. There have been no further options for those of us to take part at an alternative time/way. It makes it seem as though Sunnica are doing their best to use being unable to meet face to face to their advantage and plough ahead, by making it look as though there are no objections. When in fact, a majority of local residents have been unable to join in or have not been aware of these consultations at all. Completely unfair process.

Inadequacy of Consultation – bullets

Sunnica's 'virtual-only' consultation has not been delivered as well as it should have been. Residents would like a second round of consultation when more details about the scheme have been put together by Sunnica and when they can offer a means of truly engaging with all of the affected residents (which has been so lacking to date). Main concerns are as follows:

Lack of Access to Information:

- When planning the consultation during the pandemic, how did Sunnica assess what proportion of the population of the affected villages had access to the internet/ computers? The Covid pandemic has highlighted all too clearly that there are many families who do not have laptops/ computers (as shown, for example, with the issues accessing home school work). The virtual-only format discriminates against older members of the population and those without computers, as well as those who are less computer literate.
- Sunnica placed far too much reliance on a brochure and questionnaire as a means of 'consulting.' Consulting means 'discussing' - a brochure drop is NOT a discussion. Unfortunately, the Sunnica consultation brochure (which only gave a very superficial overview of some aspects of the proposal) was all that those residents who could not access the virtual information had to rely on, thus excluding many of them from making meaningful assessments of the scheme.
- The Sunnica consultation brochure and webinars made numerous mentions of the PEIR, which Sunnica described as a 'significant document' as it contains important additional detail about the scheme. But this was not made available to all residents – it was only available online. Many villagers were unable to access the electronic version. During a telephone request for a hard copy PEIR, Sunnica said that they couldn't post one out as it was too big for printing and too big for e.g. a DVD. In their brochure and Statement of Community Consultation (SoCC) it stated that they could supply hard copies, if requested, at a cost of 35p per page (it's a 900 page document!). This is discriminatory – against those who could not access the e-version and those that could not afford to pay for copies (especially at a time when many are facing financial hardship). After being asked multiple times about obtaining a hard copy of the PEIR in each of the villages (requests from residents, Parish Councils, as well as during the October webinar question sessions, etc.) Sunnica then put the onus on the Parish Councils to try and find a way of getting hard copies available in the villages. Such a vital part of the consultation has to be made available by the applicant from the very beginning of the consultation. It is not the responsibility of the PCs to distribute Sunnica's information about the scheme simply because they were unwilling to make a trip to the villages. Unfortunately, despite these requests, the hard copies never did make it to some of the villages (e.g. Isleham, Snailwell). Even where they did make it, by the time they arrived there was a second national lockdown so people were unable to leave their house to go and read it. Fordham village received their PEIR copy in December, just before the consultation closed (despite Fordham PC sending reminders!). In addition, the villages that did eventually receive a hard copy PEIR (e.g. Chippenham, Freckenham, Fordham) only received a partial document, without any of the appendices that contain further vital detail. Had a full, hard copy of the PEIR (main document and appendices) been made available in all affected villages from 22nd September, more people could have read it. There is no reason why this could not have been done.

- Lack of any physical consultation events excluded many villagers who would otherwise have engaged with the consultation. The pandemic was used as an excuse not to hold any physical meetings whatsoever. However, many of the villages held community events such as Farmer's Markets and Neighbourhood Plan consultations while complying with Government's COVID-19 safety guidelines during the first 7 weeks or so of the consultation period. It was possible for Sunnica to design a safe event for each village, particularly at the beginning of the consultation period. They were asked several times to do this during their webinars but they chose not to.
- Villagers reported difficulties with the consultation booklet maps at a small scale. They were unclear and difficult to read. Small font size was used in the brochure, making it difficult for visually impaired residents to interpret or measure e.g. distances from their homes to the edge of the scheme boundary etc. Maps such as Sunnica East Site A and B Parameter Plan on page 9 show no village names, road names or other landmarks, meaning they must be read in conjunction with other maps which is difficult to manage given the reader may also be using magnifying lenses. Large format maps are required for villagers to comprehend the boundaries and features of the scheme and need to be supplied by the applicant. Sunnica could easily have placed some large scale maps and other information displays in village halls for people to go and look at – even if these information displays were not manned by Sunnica.
- Consultation booklets were delivered in plain white envelopes addressed to “The Resident” without any mention of Sunnica on the outside (including the return address). Some people mistook these for unwanted marketing materials and discarded them. This point had been raised during the Non-statutory Consultation (which was publicised in similar plain envelopes) but the problem was repeated during the statutory consultation.

Webinars

- Lengthy time delays with the webinars being presented and the recordings uploaded onto websites. This took up a significant portion of the consultation period. The consultation started on 22nd Sept. The first webinar was not until 1st October. Thereafter, webinars were held on 3rd/8th/10th/15th/17th October, each focussing on a different topic. During the first 30-45 mins of each of these webinars Sunnica gave an introduction to the scheme. These introductions to the topics could have been pre-recorded and made available online at the very beginning of the consultation period (i.e. from 22nd Sept). Unfortunately, because of the way Sunnica chose to schedule its webinars, it meant that anyone wishing to hear e.g. the webinar on Construction and Operations (which first aired on 17th Oct) had to wait almost one month until the webinar on this subject was available. And anyone who missed the ‘live’ webinars then had to wait a further week or more before they could access the recorded version. Had the introduction for the various elements of the scheme been recorded and made available from the beginning, it would have meant that the ‘live’ webinars could have focussed on the questions and answers, which is ultimately what ‘consultation’ is all about. This would also have made the webinars more manageable from a time perspective, and would have allowed people to prepare questions in advance, on all topics. This would have also made it easier to ask questions across all topics in

each of the webinar sessions, rather than the questions being 'funnelled' in a topic-specific manner, which limited opportunities for broader questions to be asked.

- Some of the webinars had very poor sound quality. The recorded versions should have been made available online immediately – not over a week later (thus further eating into the time allowed to consider the scheme).
- The webinar format itself was completely inadequate as a means of 'speaking' with residents. There was no facility for meaningful dialogue between the people asking and answering a given question. Sunnica could have easily replicated the format used by Lucy Frazer MP, Matt Hancock MP, Brian Harvey (Chair of WSC) etc, who all held excellent Zoom meetings about the Sunnica proposal – these Zoom meetings allowed a proper two-way dialogue to take place, and ensured that residents' questions were fully understood and answered. Instead, Sunnica chose to do a one-way only webinar format in which questions had to be either submitted in advance or via a chat function during the live webinar. This allowed them to pick which questions they wanted to answer (and they did not answer all). It also meant that if the question was misinterpreted/ not fully understood, there was no means of clarifying it. Or if the response was incomplete or unsatisfactory, there was no way of coming back to it. This meant that anyone asking a question did not necessarily get the answers they needed. Sunnica said that they chose this format for GDPR reasons, which seems a rather 'flimsy' excuse. Privacy issues can easily be addressed by the individual attendees choosing to enable video or not, use an anonymous name etc.
- The Say No to Sunnica community group summarised three webinar meetings and they show that over 50% of the non-administrative questions were not answered fully.
- Webinars were poorly attended, reinforcing the comments above about their unsuitability as a means of consultation. During the first series of webinars, fewer than 25 connections were made while the event was being transmitted and questions could be asked online.

Inadequate Time to Review Information

- Consultation started as the Covid-19 pandemic was escalating again after the first national lockdown. During the consultation, a second national lockdown was introduced. This 4 week national lockdown was not adequately compensated for by the 16 day extension to the consultation. The lockdown further reduced people's already limited access to information. In addition, the scheme boundary was modified yet again during this lockdown (on 9th Nov) making it even more difficult to properly consult as the scheme changed part way through the process.
- Isleham and West Row areas were added to the scheme boundary very late (additional land was added just ahead of the statutory consultation starting) so these villages did not realise the huge impact the new scheme boundary would have on their villages. The Sunnica website was not updated with these changes until the statutory consultation started. So these villages effectively had no 'pre-consultation' or pre-warning about the new boundary and had very limited time to

learn about the new scheme proposal, made even more difficult during the pandemic. (Example: Ely Standard article dated 28th August 2020, just over 3 weeks before the consultation started. The article shows the scheme boundary as having 3 sites, stating that Isleham is only affected by cabling routes. This article was based on information taken from the Sunnica website at that time and then contrast this to the reality that was introduced to Isleham via the consultation booklets just a few weeks later [Huge solar plant moves to stages in East Cambs | Ely Standard](#)).

- Councils were given insufficient time to consider the Statement of Community Consultation (from 3rd Aug-1st Sept 2020) during the pandemic. Difficult to achieve when staff are ill/ working remotely etc.
- NSIPs normally have several rounds of statutory consultation before the application is submitted. This makes sense as it allows for as many details as possible to get answered / be decided before the application proceeds. A second round of consultation is essential to properly review the Sunnica scheme and the impact it will have locally.
- Statutory bodies found it difficult to respond in time due to working from home during the pandemic, staff illness etc.
- Sunnica was very slow in replying to written questions, blaming the pandemic. This prevented residents being able to understand the proposal properly in the allocated time. Many official departments (council offices, planning depts, government depts, etc.) also had long response times due to the pandemic, which further delayed residents obtaining information to assist their understanding of the development.

Sunnica's Inability / Unwillingness to Answer Questions / Lack of Detail About the Scheme

- There were many questions that Sunnica were unable/ unwilling to answer during the consultation despite being asked repeatedly throughout the consultation period. Examples include details of decommissioning, details of batteries (battery type, battery number, outline safety plans etc), details as to how they have assessed the land grade, details of job losses, traffic impact and road damage, etc. Sunnica chose not to divulge the alternative sites they have allegedly considered (they said they had a list of alternative sites but that they were unwilling to disclose it at this stage). Lucy Frazer MP also requested some of this 'missing' information on behalf of residents, and was also denied by Sunnica. Much of this 'missing' information has been summed up in the excellent joint consultation response document by EDCD/CCC/WSC and SCC. So much of this information is key to making an informed decision about the scheme and the impact it will have for local residents. It is therefore imperative that residents have a further round of consultation to allow more of these questions to be answered. Particularly now that the Covid-19 vaccination programme is well underway, so this could take place in the not too distant future, possibly with some face-to-face meetings.

- Instead of giving details, Sunnica made multiple references to working within ‘The Rochdale Envelope.’ This principle expects applicants to be able to state the worst-case scenario of many relevant factors for public discussion i.e. environmental impact, safety. But worst case scenarios were not provided by Sunnica – just an omission of detail. We therefore need a second round of consultation so that these details may be considered. As stated in the Planning Inspectorate’s guide to using the Rochdale envelope ([Advice-note-9.Rochdale-envelope-web.pdf \(planninginspectorate.gov.uk\)](https://www.planninginspectorate.gov.uk/advice-note-9-rochdale-envelope-web.pdf)), the assessments should be based on a cautious ‘worst case’ approach; the level of information required should be: “sufficient information to enable ‘the main,’ or the ‘likely significant’ effects on the environment to be assessed.” This is clearly not the case with the Sunnica scheme and the absence of any detail about batteries, alternative sites, decommissioning etc. The Rochdale envelope guide also states that, “The need for ‘flexibility’ should not be abused - this does not give developers an excuse to provide inadequate descriptions of their projects.” We feel strongly that Sunnica’s descriptions are inadequate.
- The site boundaries in the scheme have not been fully decided – it is difficult to assess a scheme when the boundaries are still subject to so much change. (Examples: late addition of land area close to Isleham just before the statutory consultation began; recent withdrawal of La Hogue land from the scheme; landowners along the current proposed cable route are resisting access, so these routes may not be the ones used, etc). The landowners whose land is contained in the scheme have not signed agreements with Sunnica – this makes the scheme very fragile and fluid and difficult for residents to comment on.
- As Sunnica is prepared to use compulsory purchase powers, what other land are they considering compulsory purchasing? The scheme boundaries could be anywhere if this principle is allowed to develop. If Sunnica is going to try and compulsory purchase land they must say what land and how will they fund the purchase. This needed to be stated in the consultation.

Misleading Statements and Claims/ Poor Advertising

- Misleading images in the consultation brochure (shows panels of around 1.5m high). No information in the brochure about the sheer scale of the scheme, and how this compares to the more usual solar farms we have come to know in this area. It implies that the scheme is ‘just another’ solar farm (typical size for this area is around 25-150 acres, not ca. 2800 acres!) It is clearly of a very different magnitude and this needed to be highlighted. If approved, this would be the largest solar plant in Europe – but this is not mentioned anywhere in the brochure, or in the SoCC.
- In the brochure introduction the proposal is introduced as, “a new solar energy farm and battery storage facility connecting to the Burwell National Grid Substation in Cambridgeshire.” No mention of the exact location. No mention of the fact it is so huge it spans 2 counties. No mention at all of Suffolk....so residents in Suffolk will not have considered this relevant to them.
- Failure to mention key information about how the scheme will actually operate, which fundamentally changes residents’ understanding of the scheme and is very different to the ‘usual’

solar farms that we have in this area. There is no mention of the fact that the huge batteries are intended for 'energy trading' of solar, other renewable and fossil fuel energy types. This aspect of the scheme throws up additional questions (such as why do the batteries need to be stored so far from the Grid, and so close to residential areas, if they are used for trading energy in and out of the Grid? How much energy is lost during the transfer of this energy, especially along such vast cabling routes, etc etc). This aspect in itself requires a second round of consultation as the overwhelming majority of residents are unaware of this, the crux of the entire scheme.

- Feedback from the pre-consultation process (during which the proposal did not include land at Isleham and West Row) was that the scheme was too big. Misleading statements appeared in the statutory consultation brochure that the scheme was made 'smaller' as Sunnica had taken the feedback from the pre consultation into account. This is not true.

The current scheme boundary change was due to a landowner in Freckenham withdrawing his land, thus forcing Sunnica to look for alternatives. The alternative that they chose (near Isleham and West Row) meant that one site had to be split into two 'smaller' sites, but this does not affect the overall size of the scheme. In fact, it makes it even more unpalatable as it requires additional cabling routes to connect the patchwork of solar sites together. Other claimed 'reductions' included amendments relating to preliminary environmental and archaeological findings - not as a result of listening to community feedback (as indicated by Sunnica).
- Consultation notifications in local newspapers were written in the small print at the back of the newspapers – these are not widely read (see photograph example below from the Newmarket Journal). Again, no mention of the scale / location was given in the adverts. Whilst this might meet their 'bare minimum' statutory obligations, Sunnica has an award-winning communications company working on their scheme, so it is very disappointing that they could not have found a more effective means of advertising the consultation using local village publications, community Facebook groups etc. These are much more widely read by the local residents, particularly during a pandemic. The village publications (e.g. Informer in Isleham, Turnpike in Red Lodge, Chippenham Village News etc) are hand delivered to every household in the directly affected villages and would have been a far more effective way of engaging with residents about the consultation.
- Sunnica did run a small number of 'panel adverts' in a few local papers, but these again used very small white text on a dark background, making them difficult to read. And the same description for the scheme was used as discussed earlier in this document (i.e. no mention of the scheme being in Suffolk, no mention of it being a NSIP, no mention of the size, location, etc. etc.). Many residents (especially in Suffolk) would therefore not pay any regard to these adverts. Surely the point of advertising is to draw the attention of all affected people to what the proposal actually is and to attract their engagement. Their newspaper adverts did no such thing. Sunnica also claimed during one of their webinars that they ran a paid Facebook campaign resulting in several thousand page impressions – but we are not aware of any of the village FB community pages getting any 'hits,' so it's unclear who the recipients actually were.

- No physical advertising in the form of posters and banners was available in the villages until parish councils requested these 5 weeks into the consultation. Even then, only 1 small banner was sent per village. More banners/ posters/ placards etc were needed to draw attention to the consultation – one solitary banner per village has practically no impact. And by the time the banners arrived and were put in place we were in a second national lockdown, meaning that residents were not moving around the villages, so didn't see them. The banners also had incorrect dates on them, which were never changed.
- The lack of effective advertising limited the awareness of the consultation, which was reflected in the lack of engagement in online activities such as the webinars (where fewer than 20 connections were made for webinars on the 1st and 3rd October 2020). Sunnica could have advertised in the local village publications and community social media pages – they chose not to do this. A second round of consultation is required to allow proper advertising in the press as detailed in the Statement of Community Consultation, as well as community publications and social media platforms, in order to allow more of the affected residents to engage properly with the consultation.

No Means of Tracking Consultation Response/ Ensuring that Questionnaire Responses Actually got to Sunnica

- Consultation responses that were submitted via the paper questionnaire were not traceable. The questionnaires were not numbered/ coded, so there is no way of gauging gaps in responses or issuing receipts to confirm they arrived at the Sunnica address. Consultation responses submitted via the online questionnaire also had no confirmation/ acknowledgement of receipt, which is normal practice for online surveys. It would have also been useful for those submitting online to receive a confirmation copy of what they had submitted. This means that residents have no way of knowing if their views have even made it to Sunnica. A second round of consultation is needed with better traceability of the responses so that residents can be assured that their comments have been included in the consultation report.

Statement of Community Consultation (SoCC)

- Mistakes and misleading information in the SoCC and in newspaper adverts (see also previous notes on advertising). Scheme advertised as, "Sunnica Energy Farm is a proposed new solar energy farm and battery storage facility connecting to the Burwell National Grid Substation in Cambridgeshire." No mention of the size and scale. No mention of location. No mention at all of Suffolk – only Cambridgeshire meaning that residents in Suffolk would be unlikely to take much notice.
- Mention of previous solar projects by Tribus/PS renewables is misleading (e.g. Oakfield and Eveley, which are on a totally different scale at 3.3 MW and 49 MW, respectively). This implies that this new scheme is of a similar ilk. SoCC also mentions that it is a NSIP as it exceeds 50 MW...but it doesn't say by how much. 500 MW is a significant 'leap' from what a 'typical' solar farm output is considered to be (the ones in this area are between 5 and 38 MW). The purpose of

a description/ advert is to draw the attention of the public to what the scheme actually is. It needs to adequately reflect what is being proposed. The misleading descriptions in the SoCC and adverts do not do this. By way of an analogy, it is like a council advertising a 'housing development with associated infrastructure' when they really mean to build a whole new town.

- In the SoCC it states that there are "two battery energy storage systems" – but three were included in the plan.

- It specifically states in the SoCC that locals will be asked to consult on: Operational impacts, Impacts from decommissioning - but there is negligible information provided on these.

Sunnica instead stated during a webinar that its decommissioning plan will be put together 6 months prior to decommissioning taking place, so they had very little detail at this stage. How are we, therefore, expected to consult on this? Not even a 'worst-case' scenario was provided. No details about how it might be decommissioned, which parts are likely to be decommissioned, no detail at all on how the land is meant to be restored to "it's previous condition" (which is unlikely given the potential soil damage resulting from this massive scale construction project). How are people meant to form a view of the legacy we will be left with after this scheme ends with no detail provided on which to consult?

- In the SoCC it also specifically states that the public will be asked for views on the PEIR. As mentioned previously, this was not made available to all residents, so how can they be consulted? Sunnica said the PEIR was too big to put onto DVD, so anyone without a computer/ internet access cannot see it. In the SoCC it states that hard copies will be available on request – but at a charge of 35p per sheet as mentioned previously. This is discriminatory. Sunnica was requested multiple times in the webinars to provide hard copies of the PEIR in the village but this was not honoured. Chippenham and Freckenham got partial copies (the main document, but none of the supporting appendices). Isleham and Snailwell did not receive any hard copy at all. And even if the villages did receive a partial hard copy, it was close to/ during the 2nd national lockdown and couldn't be accessed. This document is a key part of the consultation and should have been made available in villages right from the very beginning of the consultation period. The Planning Inspectorate "Guidance on procedural requirements for major infrastructure projects" suggests, "Applicants should engage proactively with local authorities and local communities to find alternative means to provide access to the documentation where required, to ensure on-going fair participation in the planning process, for example by providing copies of documents on a USB flash drive where parties have access to a computer but have limited or no internet access or, where reasonably practicable, by making copies of documents available for inspection free of charge where a person is unable to access the documentation electronically or finds it difficult to do so."

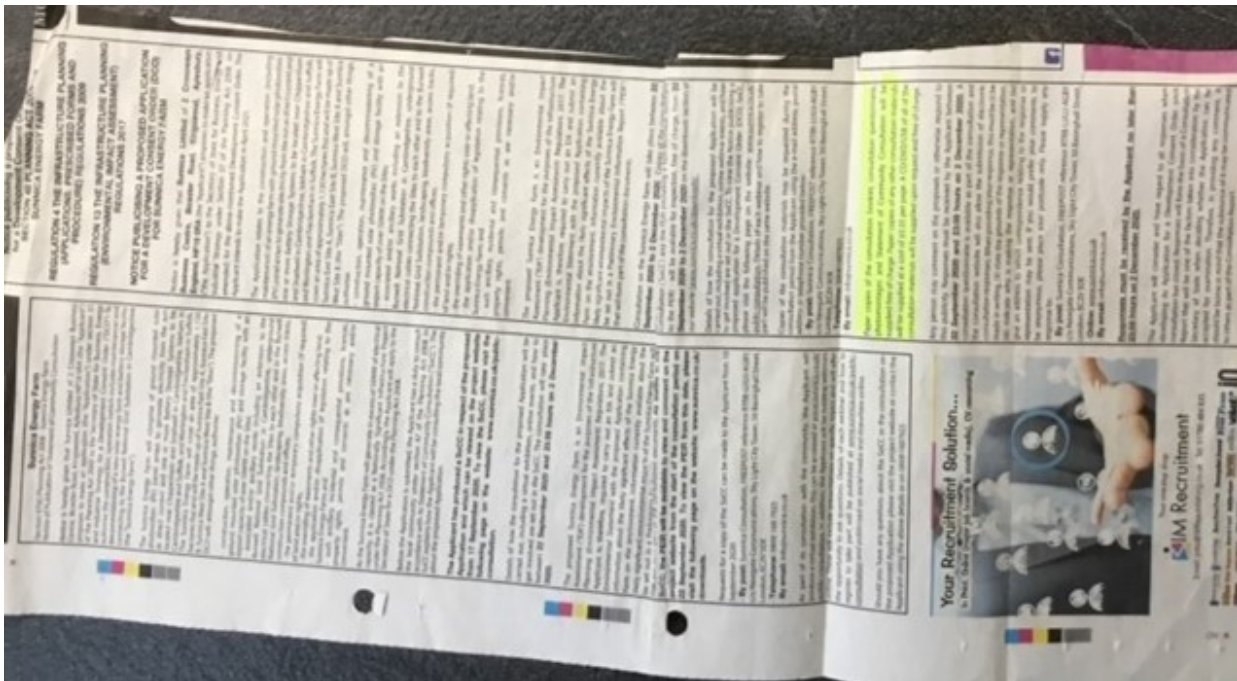
Complaints

- ECDC councillors have already complained about the "woefully inadequate and laughable" consultation ([East Cambridgeshire District Council - YouTube](#) relevant meeting, Sunnica starts

about 2 hours in [East Cambridgeshire District Council, Planning Committee 2nd September 2020 - YouTube](#)

- [Say No To Sunnica - YouTube](#) – WSC Councillor describes the consultation as ‘farical’ (listen to 3.01 mins)
- Despite claims in the SoCC, ECDC councillors said that three Cambridgeshire Parish Councils that are directly affected by the scheme have had NO direct contact from Sunnica. (Ely Standard Newspaper article Sept 2020: ECDC councillors [‘Man up’ and start talking energy firm told](#)).
- Suffolk councillors requested further information so that people can make an informed assessment of the scheme. Comments such as, “At this stage of the process we have many questions to which the answers are not entirely clear, so it’s appropriate at this stage to take these issues to the developer.” And, “The sheer scale of the project means its impact will be significant and very far-reaching [REDACTED]
- Freckenham Parish Council – sent letter to Sunnica on 9th Oct outlining many concerns about the inadequacy of the consultation. Sunnica declined to offer additional support for most of the concerns raised ([9.10.20-Sunnica-stat-consultation-complaint.docx.pdf \(suffolk.cloud\)](#))

Example of newspaper advertising. Newmarket Journal – small print at back of paper



Example of ‘Panel Ad.’ Bury Free Press

Public consultation

22 September 2020 – 2 December 2020

Sunnica Energy Farm is a proposed new energy farm with solar photovoltaic (PV) and energy storage infrastructure connecting to the Burwell National Grid Substation in Cambridgeshire.

Find out more

You can find out more about the proposals and how to respond the consultation by:

1. Going to our website, sunnica.co.uk/public-consultation

You can view all the documents we are publishing as part of the consultation as well as a virtual public exhibition there.

2. Contacting us to request a copy of a booklet summarising the proposals and a consultation questionnaire.

3. Viewing a series of webinars we will give about the proposals online. These will offer the opportunity to ask questions about the proposals. You can find a list of all of the webinars and register to take part at sunnica.co.uk/public-consultation

4. Booking an appointment to speak to the project team individually. You can book the appointment using the contact details in this advert.

5. Contacting us directly using the details below.

Contact us

For further information, please go to sunnica.co.uk or contact us on info@sunnica.co.uk or 08081687925.

Alternatively, you can write to us at: Sunnica Consultation, FREEPOST reference RTR8-LUJL-AGRY, c/o Newgate Communications, Sky Light City Tower, 80 Basinghall Street, London, EC2V 8DE



From: [REDACTED]
To: [Sunnica Energy Farm](#)
Subject: Adequacy of Consultation
Date: 23 November 2021 20:19:37
Attachments: [Sunnica Adequacy of Consultation 1.docx](#)

Dear Sir

Below is my concerns about the adequacy of consultation conducted by Sunnica at their consultation of 22nd September – 2nd December 2020. I have provided it as a word attachment document for your additional convenience.

Sunnica :- Adequacy of Consultation.

Sunnica Pre-Application Process for a NSIP across two sites in Suffolk and Cambridge.

- The comments below reflect Sunnica's attitude not to engage with the communities affected by their proposed scheme.
- Newgate Communications failed miserably to take on board the points raised at the non-Statutory public consultation in June / July 2019. The request raised was that going forward any future literature regarding Sunnica should be delivered on "Sunnica Faced Envelopes" to raise the profile of Sunnica and engage with the communities affected.
- Presentation of the scheme boundary in the Sunnica Consultation Booklet 22 September – 2 December 2020 was poor and confusing. Sunnica's use of grey ink, is a poor medium to read, whereas black ink would have enhanced detail and definition.
- Parameter Plans for Sunnica East A and B and Sunnica West A and B had all Towns and Village names removed. Why would you remove town and village names from such a key consultation document?
- The Sunnica Consultation Booklet 22 September – 2 December 2020 failed to declare the site acreage involved on each of the East and West Sites.
- Sunnica Consultation Booklet 22 September – 2 December 2020. The booklet was not delivered to some households until after the 22nd September. A consultation of this importance should have been delivered on the actual start date.
- No "mock ups" were available to show the size and scale of this project which should have been available for the Sunnica Consultation of the 22 September – 2 December 2020. A project classified as a "Nationally Significant Infrastructure Project" should have this detail.
- Updates that took place on 07.11.2020 radically changed the format and volume of information presented prior to that date. Why did Sunnica wait 46 days to update this information which changed the format of the original Consultation Booklet delivered on the 22nd September?
- Environmental Impact Assessment is a critical part of the Consultation Process. Why then, have Sunnica omitted from their consultation that there could be a cumulative Environmental Impact from the Strategic Pipeline proposed by Anglia Water being in the proposed location at the

same time.

Webinar meetings were not satisfactory for the following reasons: -

- The Sunnica Covid 19 Consultation process is under a cloud of “Age Discrimination”. Many of the older members in these villages have a long association with their village and they care passionately about their environment. They are unsure of the technology, the webinars and the cold phone calls which takes away their physical ability to go to a map and point out their immediate concerns to Sunnica.
- Failure to answer written questions in a timely manner to allow for cross examination at a later date.
- Written and oral questions were answered from a point of view of Sunnica’ s interpretation and allowed for no immediate correction by the addressee.
- Sunnica placed too much emphasis on referral to sections in the on-line Consultation Document rather than give a direct answer.
- Poor attendance at the webinars is confirmation of the difficulties experienced with the technology available.
- The on-line consultation document was not easy to navigate to find answers for yourself. This was further compounded by the adjustment of information on the 07th November which changed the orientation of the original documents issued on 22nd September.
- Presentation of The Construction Management Plan is based upon proposed routes for construction traffic making it difficult to interpret the impact upon the current infrastructure and the villages adjoining the final planned route.
- Sunnica have failed to engage with The Highways Department during their preliminary hearings again showing a total neglect towards the affected communities.

In conclusion Sunnica continue to be evasive about their commitment to the villages and communities that their project will engulf. These communities have a right to question this change which will have a long-term repercussive effect upon their visual amenity and well-being not forgetting that this development is a static ageing technology that may no longer be fit for purpose after 40 years.

John Leitch

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

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- Environmental Impact Assessment is a critical part of the Consultation Process. Why then, have Sunnica omitted from their consultation that there could be a cumulative Environmental Impact from the Strategic Pipeline proposed by Anglia Water being in the proposed location at the same time.

Webinar meetings were not satisfactory for the following reasons: -

- The Sunnica Covid 19 Consultation process is under a cloud of “Age Discrimination”. Many of the older members in these villages have a long association with their village and they care passionately about their environment. They are unsure of the technology, the webinars and the cold phone calls which takes away their physical ability to go to a map and point out their immediate concerns to Sunnica.
- Failure to answer written questions in a timely manner to allow for cross examination at a later date.
- Written and oral questions were answered from a point of view of Sunnica’ s interpretation and allowed for no immediate correction by the addressee.
- Sunnica placed too much emphasis on referral to sections in the on-line Consultation Document rather than give a direct answer.
- Poor attendance at the webinars is confirmation of the difficulties experienced with the technology available.
- The on-line consultation document was not easy to navigate to find answers for yourself. This was further compounded by the adjustment of information on the 07th November which changed the orientation of the original documents issued on 22nd September.
- Presentation of The Construction Management Plan is based upon proposed routes for construction traffic making it difficult to interpret the impact upon the current infrastructure and the villages adjoining the final planned route.
- Sunnica have failed to engage with The Highways Department during their preliminary hearings again showing a total neglect towards the affected communities.
- In conclusion Sunnica continue to be evasive about their commitment to the villages and communities that their project will engulf. These communities have a right to question this change which will have a long-term repercussive effect upon their visual amenity and well-being not forgetting that this development is a static ageing technology that may no longer be fit for purpose after 40 years.

John Leitch



From: [REDACTED]
To: [Sunnica Energy Farm](#)
Subject: FW: Adequacy of Consultation - SUNNICA Industrial Solar Scheme
Date: 29 November 2021 11:48:25
Attachments: [image018646.png](#)
[image030132.png](#)
[image832057.png](#)
[image844144.png](#)
[image913115.png](#)
[image056187.png](#)
[image110619.png](#)
[image355892.png](#)
[Scan_compressed.pdf](#)

To whom it may concern.

Please find attached a copy of my letter referencing the terrible Consultation conducted by Sunnica. Please acknowledge receipt of this email.

Many thanks

Nick Wright

Nick Wright

Director



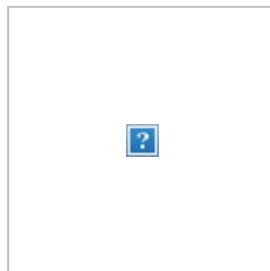
[REDACTED]
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Tel: [REDACTED]

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From: Nick Wright

Sent: 04 November 2021 08:42

To: andrew.phillips@eastcambs.gov.uk

Subject: FW: Adequacy of Consultation - SUNNICA Industrial Solar Scheme

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

4TH November 2021

Dear Mr Phillips

Adequacy of Consultation – Sunnica

I write to state my strong belief that the communities affected by the Sunnica Industrial Solar Farm, have not been adequately consulted during the pre and statutory consultation periods. The Department for Communities and Local Government published a Guidance on the Pre Application Process in March 2015. I have based my comments on the information contained within this document and particularly advise given to any NSIP applicant in point 20, and I quote and have highlighted in yellow:

Experience suggests that, to be of most value , consultation should be:

Based on accurate information that gives consultees a clear view of what is proposed including any options. I have listed below many examples of when information was inaccurate and why it has been impossible to gain a clear view of Sunnica's intentions :

1/ Richard Tuke a landowner who owns land neighbouring Freckenham village withdrew his land from the Sunnica scheme. This land was included in the original pre consultation scheme. Sunnica were forced to take other land which was between West Row and Isleham into the scheme. This new land had not been considered in the pre consultation process. Sunnica's statement that they had listened to pre consultation was untrue. The scheme had altered because a landowner had taken his land out.

2/ Sunnica have refused to give the details of the solar panels they intend to use or any details other than area of land to be taken about the BESS. It is simply impossible for them to have worked on the scheme and not know this information. They have also refused to give any details of the BESS safety plans. How can a consultation be meaningful without this information.

3/ Sunnica have claimed the cable route is agreed – it is not. They have said they will use compulsory powers if landowners deny access to land they want to use in their scheme, but have not been clear when and how they will use these powers.

4/ Sunnica have refused to give details of the highway routes they will use to bring in all the equipment for construction. Access plans to the sites for the building of the solar fields and the BESS have not been given to the local communities.

5/ Sunnica have refused to give details of the electricity trading business they intend to enter into using the BESS they are proposing. They have refused to tell us how much electricity will be lost when it is taken from the grid and sent up to 15 miles to be stored in BESS.

6/ No evidence of other options and sites, that have been considered have been offered to us by Sunnica.

7/ Sunnica have provided misleading information on the following ;

a/ Output of the scheme in MWH - it will not be a 500MWH scheme

b/ The manufacturing carbon footprint of equipment being supplied to the scheme has not been taken in to account in calculating the overall carbon footprint of the Scheme despite Sunnica claiming it has in the text.

c/ The reasonable life span of the scheme has been extended to 40 years by Sunnica. Solar schemes have an expected lifecycle of between 20 and 25 years.

8/ Sunnica have been disingenuous in the use of the Rochdale Envelope principle. This format should be used to give sufficient information to enable the likely effects on the environment to be assessed. This is clearly not how Sunnica have used the principle. They have quoted the

principle to avoid answering questions but have never employed it when assessing the scheme. This was apparent in all the webinars and throughout the whole consultation. The Rochdale principle is not an excuse for developers to give inadequate descriptions of their project which is exactly how Sunnica have used it.

9/ Sunnica withheld the Soil Analysis reports, and refused to allow other soil experts to take samples from the proposed site. Misleading comments on the quality of the land were made. Other consultees commenting on the scheme took Sunnica's misleading comments to be true and therefore did not comment correctly.

10/ the Statutory consultation document refers to the scheme being in Cambridgeshire only. Nobody in Suffolk would have been alerted. It refers to two BESS not three.

12/ No detailed costings or method of payments were supplied re: decommissioning. Sunnica said on a Webinar that a plan would be put in place 6 months before decommissioning was due to take place.

13/ Sunnica have [REDACTED] La Hogue with compulsory purchase. They have not explained their position on Compulsory Purchase, and will not make a clear statement when asked.

14/ The PEIR was referred to in the webinars and the booklet, but was not made available to all residents. It was only available online. If a hard copy was requested Sunnica wanted to charge 35p per page and it was over 900 pages long. In their brochure they said they would provide hard copies.

15/ It is misleading to claim either Tribus or PS Renewables had experience of large solar schemes. The two they quote as examples of their experience are Eveley and Oakfield. These schemes are 3.3MW and 49MW respectively. Sunnica is 500MWH. They are not experienced operators at the scale of the Sunnica scheme.

16/ At no point during the advertising of the Sunnica Scheme do they refer to the huge scale of the scheme. They talk about a Solar Farm not mentioning its scale. This is misleading. As Sunnica is the largest scheme ever proposed in the UK mention of its size is vital for people to understand.

shared at an early enough stage so that the proposal can still be influenced, while being sufficiently developed to provide some detail on what is being proposed: and

1/ From the above you will see so much detail was withheld, or was changing it has been impossible to accurately assess the Sunnica scheme. This has been a deliberate and exploited ploy by Sunnica throughout.

2/ I sent an email question to info@Sunnica on 21/9/2020 and I had no reply despite four chases by email by 26th October 2020. I sent a further question 30th October 2020 and had no reply.

Engaging and accessible in style, encouraging consultees to react and offer their views:

Sunnica made optimum use of the Covid rules to avoid open public meetings with the effected communities. During the first 7 weeks of the consultation period it would have been possible to hold meetings in person which Sunnica avoided. Sunnica never engaged in any personal open contact with the communities after the pre consultation meetings.

The whole consultation was conducted by webinar meetings. Some of these were held at peculiar times during weekends making it difficult for people to attend. They were not open dialogue meetings. Questions had to be submitted by email and they were not always read out. Sunnica gave a reply, but no follow up was allowed. This meant often the question was not answered or if it was a supplementary question could not be asked. The consultation was in direct contradiction to the sentence above. We analysed three webinar meetings and they show that over 50% of the non-administrative questions were not answered fully.

As demonstrated by the above we were not provided with sufficient information or allowed an open dialogue with Sunnica. We have not been consulted adequately. We do not have enough genuine information about the scheme to allow us to make an informed opinion.

We have to make many assumptions. For a scheme that it appears will have such a detrimental effect on the area this is not acceptable. PINS should ask Sunnica to reconsult with the local communities and Councils and be honest and open about what they intend to do and how they intend to do it.

I have attached the excellent Joint Council response dated December 2020. I have highlighted in yellow all the queries raised in the report. There are 549. This can not have been an adequate consultation!!

I would like this letter to be attached to the submission to PINS from the District Councils.

Regards

Nick Wright

SUNNICA ENERGY FARM - RESPONSE TO STATUTORY CONSULTATION

December 2020

Introduction

This document is the joint response of West Suffolk Council, Suffolk County Council, East Cambridgeshire District Council and Cambridgeshire County Council (referred to as "the Councils" in this response) to Sunnica's Section 42 consultation. Unless it is identified otherwise in specific sections, the Councils share their views on matters within this response. Any views expressed in regards to East Cambridgeshire District Council are at an informal professional officer view only.

The following comments are organised according to the chapters of the Preliminary Environmental Information Report

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EIA Methodology

Policy considerations

The Councils acknowledge the need to increase renewable energy generation. For example, West Suffolk Council is an investor, developer and supporter of renewable energy generation and has set out its plan to achieve Net Zero Emissions. The Councils recognise the demands for new additional generation and the UK Government's legal obligation to achieve Net Zero Emissions by 2050, as supported by research and publications by the Committee for Climate Change.

East Cambridgeshire District Council on the 21 October 2019 declared a climate emergency. Policy ENV6 of the Adopted Local Plan 2015 and the Council's Renewable Energy SPD both support in principle solar farms, with battery storage to use the solar energy created at the most appropriate times during the day.

NPS EN-1 (the Overarching National Policy Statement for Energy) was published in July 2011. This sets out the UK Government's commitment to increasing renewable generation capacity and recognises that, in the short to medium term, much of the new capacity is likely to come from onshore and offshore wind. Solar is noted within the document as being an intermittent renewable technology.

NPS EN-3 (the National Policy Statement for Renewable Energy Infrastructure) does not include solar power or electricity storage within its scope. NPS EN-3 suggests that, at the time of designation in 2011, other types of onshore renewable energy generation were not technically viable at a scale of more than 50MW, and that the Government would consider revisions to NPS EN-3 or separate NPSs to cover such technologies should the situation change. The Councils acknowledge that the feasibility of delivery of solar PV technology has advanced to enable deployment on a larger scale, however, no such updates to the NPSs have been produced to indicate that solar PV on the scale proposed is appropriate.

In relation to 1.2.10, the Councils welcome a diverse energy generation mix to support the growing need for clean renewable energy. The East of England has significant solar photovoltaic generation in place, with more planned in the future that will make it one of the dominant onshore renewable generation technologies in the short term¹.

In relation to the policies set out and the acknowledgement to the developing West Suffolk Local Plan, it is clear that Councils will need to develop clear strategic plans to achieve net zero emissions balancing out demand reduction with increased electrical demands and renewable generation alongside the needs of the community and the need for wild biodiverse ecosystems that will provide the carbon positive countryside we demand upon.

East Cambridgeshire requires the developer to assess the significant loss of agricultural land over the lifetime of development and how this loss might be further

¹ See East of England Renewable Capacity Plan:

pressurised by the need for the Council to deliver dwellings, employment and the need to provide greater areas of biodiversity.

The Councils therefore require additional information in relation to the carbon balances of the development as the land take required is clearly significant and relevant to the local activities to achieve net zero emissions.

The UK Solar PV Strategy requires proposals to be appropriately sited, with proper weight given to environmental considerations such as landscape and visual impact, heritage, and local amenity, and provide opportunities for local communities to influence decisions that affect them. As detailed elsewhere in this response, insufficient weight has been given to the environmental effects of the proposal, particularly in relation to its landscape and visual impact. Insufficient attention has been paid to the views of the local communities and there is little evidence to demonstrate that the local communities have had any meaningful input to the scheme design.

The proposed Development Consent Order (DCO) boundary definition makes reference to land potentially being required temporarily and/or permanently. Clarification as to what land is required on a temporary basis and for which periods is required.

The scheme definition refers to a *potential* Battery Energy Storage System (BESS). If there is a possibility that this element of the scheme may be removed, then the needs to be non-BESS scenarios within the PEIR. Clarity is necessary as all other references within the PEIR indicate that this is a confirmed part of the scheme.

East Cambridgeshire District Council wish to point out that the village of Witchford has an adopted Neighbourhood Plan, as the developer does not make reference to this in their adopted policies for East Cambs while referencing the other adopted neighbourhood plans.

West Suffolk Council highlight that Freckenham as an emerging Neighbourhood Plan and the Freckenham Landscape Character Assessment with Key Views is complete and published on the Parish Council website.

Scheme Location

This section describes the location of the project. The Councils do not disagree with this description. Our view on site selection can be found in the Alternatives section.

Scheme Description

The scheme description fails to identify the electrical generation capacity for the scheme, and it is considered that this information should be contained within this section in the same way that it is detailed in the Scoping Opinion. Likewise, confirmation of the BESS electrical capacity should also be contained within this section.

Plate 3-10 depicts a typical battery storage compound configuration. The BESS electrical capacity of this configuration needs to be set out including how this relates to the proposed BESS system as set out in the Scoping Opinion.

The solar PV generating capacity is significant as it will enable an assessment of the Green House Gas (GHG) impacts benefits from the project set out in later chapters. Further comments in this response in relation to the energy proposed to be generated and the need for clarification of the size of the solar array relate to the scheme description as do the role of the BESS in emissions savings and the quantification of the overall emissions benefits.

Paragraph 3.6.12 refers to the volume of staff on site, and the vehicle journeys this will generate and is of significant concern. Whilst a Travel Plan will be produced, its effectiveness will depend on investment and consideration as to implementation. The potential for, a shuttle bus or holding non-critical journeys away from the site should be part of the Travel Plan. An understanding of how vehicle journeys will be distributed across the sites is required in order to aid the understanding of the key issues and would assist the promoter in developing a travel plan and recommendations to manage journeys that can actually be implemented. Does the applicant intend to make provision for any temporary living accommodation on site for staff and/or make land available for privately owned accommodation to be sited?

In relation to paragraphs 3.6.15, 3.6.16 and 3.6.27, the Councils expect further details in relation to the fuel used on site and how this will be monitored and managed for efficient use. The promoter should provide a final report of the fuel consumption and carbon footprint of the scheme after completion showing what was undertaken to reduce fuel consumption and emissions generation.

Concerns are raised in relation to paragraph 3.6.25 and the treatment of topsoil and spoil from the sites. In terms of the soil as a natural resource, retaining the distinct ecological characteristics of the sites and to encourage local biodiversity back to the sites there needs to be a priority for topsoil management, retention and redistribution on site. Further reference to the management and maintenance of the sites post construction should be made and it is suggested reference is made to DEFRA's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites and that this tool is utilised- [REDACTED]. The operational phase management should minimise fuel demands and avoid spraying, and this should be detailed.

Clarity is also required on where the weather stations be positioned and what form will these take.

Paragraph 3.6.13 states that working hours are expected to be 07:00 to 19:00 Monday to Saturday. An assurance is required on these hours and that there will be no working on Sundays, bank holidays and public holidays. Chapter 11 of the PEIR (noise and vibration) is based on these working hours and assumed construction plant such as a push press piling rig. The actual methods are not confirmed but, as noted in 11.8.10 for example, vibration distances are lower for push piling than other piling activities.

East Cambridgeshire Council's Environmental Health Officer has raised concerns in

regards to proposal, these are included within the Noise and Vibration section below. In addition, concern is raised about why flood lighting is required, when other solar farms have demonstrated they can secure the site with infrared lights during the operational stage of the development.

The location of the office/warehouse at Sunnica East Site A is questioned given the amount of vehicular traffic that will need to use the local road network to access the site. The office/warehouse would be better located at parcel E18 where there is access from the major road network. It is unclear from the parameter plans what is occurring on parcel E23.

Alternatives

The PEIR states that a report setting out the assessment of alternative sites will be submitted with the DCO application. While the PEIR sets out that a key consideration in relation to site selection was the chosen connection point at Burwell, it is unclear how a search radius of 15km from this point was arrived at. East Cambridgeshire specifically would refer to the elements of the energy farm near Isleham that are located a substantial distance from Burwell given the route of the electrical cable. Furthermore, the promoter should explain why land closer to Burwell Substation does not form part of the scheme, to negate the need for the installation of extensive connecting cables, and that the use of four separate sites is an efficient strategy given the additional connection work that will need to be undertaken.

The PEIR fails to include two critical requirements in connection with site selection in connection with the avoidance of areas that have an impact on residential areas and, in respect of Sunnica East, the avoidance of an impact on The Brecks. The Sunnica East sites are located close to ancient villages (some dating back to 1000 AD) such that over 11,000 residents will be impacted by the development. The proposal will surround a number of villages, reducing the perceived openness of their landscape setting, and in places individual properties/farms are enclosed by the development. For further details of the landscape impacts see the Landscape & Visual Amenity section below.

It is noted that there are proposals for other solar PV installations in the vicinity of Burwell substation and it is assumed that all such installations will want to use the same connection point. The promoter should demonstrate that their proposal is still feasible and viable should these other installations be completed ahead of the anticipated operation years.

Geographical location, local weather patterns, pollution levels and damage or failure of key components are some of the important factors influencing the overall effectiveness of solar PV. The promoter should provide further detail to demonstrate that such factors have been taken into account including, for example, whether damage from bird strikes has been considered. West Suffolk Council has experience of damage being caused to solar panels from birds dropping stones from height onto the panels, believing that they are a body of water.

The promoter should demonstrate that sufficient light will pass through the solar PV panel tables to support plant growth below.

It is considered that the option of 'No Development' should be included in the Environmental Statement in sufficient detail given the extent of land that will be occupied by the scheme and the adverse effects it may have on soil and carbon storage and any future options to increase the carbon sequestration from this considerable land area.

The need for the generation of renewable energy should not be stated in isolation. The Committee on Climate Change (CCC) have stated that a considerable amount of carbon could be stored by improved land use and from land use change, as set out in 'Land use: Reducing emissions and preparing for climate change':

'Land is a critical natural asset. It provides us with the fundamentals of life: clean water, food, timber, and the natural regulation of hazards such as flooding. Key to the effective functioning of these is biodiversity. Land is also an essential resource to mitigate climate change, naturally sequestering and storing carbon. Over the rest of this century and beyond, climate change combined with other social, economic, and environmental pressures will present significant risks to the services provided by the land. Unless land is managed more effectively over this transition, its essential functions will not be maintained for future generations'.

The above document is now being utilised to set out environmental targets within the Environment Bill, which will detail how soil health and improved woodland health should be achieved, monitored, and reported. It would be beneficial to understand how this project may impact on these expected targets and the stated ambitions for a Nature Recovery Network.

The Councils agree with the point made at 4.2.7 in relation to energy diversity and would highlight that, in the East of England, Suffolk and Cambridgeshire are locations where solar PV is the predominant onshore renewable energy generation technology. However, the projects role in diversification locally is not adequately explained.

The Councils expect to see a comparison to other energy generation technologies in this section. It is noted from 4.1.3 "The NPS confirms that from a policy perspective there is no general requirement to consider alternatives or to establish whether a development represents the best option." However, this is contested given the rapid growth of the renewable energy industry, the need to achieve Net Zero Emission by 2050 and the roles that land use and land use change will play in achieving this Net Zero Emissions target, the discussion around "best option" might have moved on.

It is appropriate to consider how alternative schemes using the same technology may have different acceptability depending on the scale of development. As the scale of a development increases, the resulting increase in benefits is presumably directly proportional as the amount of clean energy that can be produced increases with the amount of land that can be used for arrays. However, it is not obvious that the relationship with environmental impacts is necessarily proportional in the same way, as the marginal impact of each additional hectare of land may be greater than the last. It could therefore be appropriate to consider the relative impact of multiple smaller sites amounting to the same total output. It is our view that this scenario

constitutes a reasonable alternative for the purposes of paragraph 14(2)(d) of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.

To better understand comparisons to projects with significant visual impact, the Councils would like to see an appraisal of Onshore Wind as a comparator project or a hybrid Onshore Wind and solar PV project. The reason for this appraisal of the alternative generation technologies is to help us to understand the benefits and challenges of the proposed approach.²

East Cambridgeshire District Council seeks greater clarification on the amount of different grade's of agricultural land in order for the developer to justify its statement under 4.3.16 that states the scheme "maximises the utilisation of low grade, non best and most versatile agricultural land".

Climate Change

In relation to 6.3 Assumptions, the assessment should include the emissions from land use and land use change and the carbon sequestration of the land. This is significant given the area of land and the need for increased carbon sequestration from land and vegetation³.

Section 6.3.3 states that 'it has been assumed that overall loss of vegetation will be minimal'; this needs to be firmed up and must state what will be impacted.

In Section 6.3.10 the Councils cannot identify a target for waste material recycling from the project. We would suggest that a higher recycling percentage than 50 percent should be targeted.

Section 6.3.17 - It is requested that the information from the promoter's design team be shared. What is the expected peak electrical generation and annual energy generation for the site and what assumptions are being made in relation to the BESS?

A diagram showing the GHG emissions boundaries should be included at 6.4.3.

Table 6-2 - In relation to "Operation stage" the information should include information in relation to soil carbon and sequestration in vegetation⁴. Given the large area and the figures available for soil and vegetation carbon storage and the 40-year lifetime of the development we feel this is a significant omission. Especially given the need for soil carbon improvements and afforestation as a measure to store carbon.

At 6.4.22, the Councils would prefer to see a county or regional approach with reference to total GHG emissions. The development, located in the districts of West Suffolk and East Cambridgeshire, will feed power into the local grid, and would be accounted for as part of Net Zero Emissions targets for West Suffolk, East Cambridgeshire, and the region. The generation will be included as a regional asset

² See, for example: [REDACTED]

³ See: [REDACTED]

⁴ See: [REDACTED]

for Suffolk and Cambridgeshire, it will impact on the local distribution network as managed by UKPN. More importantly, the development impacts on local people and the local environment and therefore it should be able to define its benefits and risks in line with those of the community in which it is situated. This approach means that the Magnitude Criteria for GHG Impact Assessment needs to be reviewed.

Given the need to achieve Net Zero Emissions by 2050 and the need for increased levels of carbon storage and sequestration, the assessment should include data in relation to fluxes of carbon based upon changes to land use over time and in comparison to a baseline scenario where the land is managed in a consistent way to present.

In relation to section 6.6, Baseline Conditions, as set out in Table 6.6 in the comments from the Planning Inspectorate a more detailed response in relation to baseline conditions is required.

The Councils have several questions with regard to sections 6.6.2, 6.6.3 and 6.6.4. What figures for carbon storage has the EIA processes used to assess the soil carbon storage and carbon sequestration from vegetation from the 1,073-hectare site? What is the annual rate of carbon storage and what is the value over 40 years and then in comparison to the construction, operation and decommissioning of the proposed development? How does this figure compare to the following statement in 6.6.4?

"While the current land use within the DCO Site will have minor levels of associated GHG emissions, it is anticipated that these emissions will not be material in the context of the overall Scheme. Therefore, for the purposes of the lifecycle GHG impact assessment, a conservative GHG emissions baseline of zero is applied"

In relation to section 6.7, Embedded Design Mitigation, given the scale of the development, the waste generated, the water and fuel inputs, vehicle journeys and the need to limit the overall GHG emissions arising from the construction phase, the use of the Considerate Constructors Scheme (CCS) is not suitable to the project.

Although listed as Best Practice, the CCS is, instead, commonplace with a light touch approach to on-site environmental management. It does require monitoring of impacts but we would expect that such a development will seek to ensure it meets environmental management best practice in terms of target setting, on site management, monitoring and reporting as well of off-site reporting to key stakeholders. In terms of demonstrating Best Practice, the Councils would expect a stated objective to achieve an Excellent or higher CEEQUAL rating as set out in Version 6 targeting key outstanding credits, such as 4.4 "Change and enhancement of biodiversity" and 7.2 "Reducing whole life carbon emissions with an independent third-party certification of carbon management activities".

In addition to SuDS, how will the site design in surface water flood attenuation from this use of vegetation and also ensure a net positive impact in the loss of soils into water systems or air?

In relation to section 6.8.7, as stated previously, the calculations used to determine the professional judgement with regards to the loss of carbon sink from the land use change should be set out. The land area is significant for the districts of West Suffolk

and East Cambridgeshire, and stated ambitions to achieve Net Zero Emissions means that the Councils will need to balance energy generation, energy demand reduction, emissions savings policies and activities alongside soil carbon and other forms of carbon sequestration.

The Councils request the figures utilized alongside to evaluate soil carbon and carbon sequestration as the baseline alongside the figures for the construction, operation, and decommissioning phases to better demonstrate the baseline emissions alongside the GHG impacts from the proposed development.

In relation to section 6.8.23, the promoter should clarify the size of the peak electrical generation capacity of the proposal. The Councils note the 653,973 MWh stated and this would require 1350kWh/kWp/yr from a 500MWp array (which is not possible) or an array with a rated peak generation of around 725MWp using West Suffolk Council's standard solar PV calculation model.

It follows that confirmation is required that the figures stated in relation to the operational emissions benefits are correct - it is noted as being 744,061 tCO₂e (6.8.32) over the 40-year project life - with an average emissions factor of 0.0316 tCO₂e/kWh. It is noted that the detail in 6.8.28 and 6.8.29 shows the forecast grid intensity in Plate 6-1.

If there is an issue with the energy generation and emissions savings figures then all emissions figures should be reviewed to ensure Completeness, Accuracy, Consistency, Relevance, and Transparency.

Potentially these overall emissions savings also account for some benefits from the BESS. If that is the case this should be set out together with clarification on the installed generation capacity of the solar PV array modelled and the BESS size and operation benefits assumptions.

In relation to the Significance of Effect, 6.8.33 to 6.8.41, it is felt that these figures should reflect the impact locally in relation to the emissions arising from the areas that the development is located in as the development will affect the strategic plans for the local areas to meet their Net Zero Emissions targets and impact on future decision making.

Have the 'Increased summer and winter temperatures' been taken into account in relation to the impact on the Solar cell performance at 6.8.49?

In relation to 6.9.1 and as set out previously it is recommended that this development sets a CEEQUAL target to achieve and enhance the level of monitoring of key emissions sources during construction and the works to manage and reduce these to achieve the stated targets.

In relation to 6.9.2 it is good to see the overall emissions for the development in comparison to the other figures for energy generation options. It would be useful to see these again once the generation and emissions figures have been clarified. With this in mind, and given the oversight of the soil carbon and the need for improvements and carbon sequestration, we do not feel it is sufficient to rely on the emissions savings during operation instead of ensuring the emissions from construction, operation and decommissioning are properly targeted and managed. In addition, the UK Net Zero Emissions target means it is even more important that the construction, operation, and decommissioning emissions arising from the

development are minimized as much as possible as the GHG benefits of the site will diminish over time.

In relation to the points above and also the local significance of this development the Councils feel that additional mitigation measures should be put in place to ensure that soil and vegetation carbon storage is improved and the emissions arising from the development are minimized.

East Cambridgeshire District Council welcome the fact that comparisons to gas, nuclear and wind power have been made.

Cultural Heritage

Built Heritage

The Councils broadly consider the chapter on cultural heritage acceptable in as far as it relates to built heritage. The following point should however be addressed:

- Paragraph 7.4.1 refers to the study area as being 1km which extends to 5km for higher grade assets. There does not appear to be any explanation for this, and the setting of Grade II listed buildings is protected in the same way as the higher-grade buildings.
- Table 7.17 - Sunnica East B refers to views to the north of the Freckenham Conservation Area potentially being affected. This is more likely to be in views to the east. Sunnica West A also refers to the same view from Freckenham being affected. It is assumed that this is included in error.

East Cambridgeshire District Council's Conservation Officer states:

"The Preliminary Environmental Information Report itself notes:

'7.8.31 Chippenham Hall RPG (Grade II, NHLE 1000615) is likely to experience adverse effects as a result of the Scheme at Sunnica West Site A..The Scheme will have short- and long-term, and permanent adverse impacts on this asset. It will introduce new infrastructure elements within the rural setting of the park that although will be screened for its most part, the landscape around the park will be altered.'

'7.6.63 The formal parkland is defined by its brick boundary walls, with the south drive extending towards Newmarket. While the wider rural landscape is not visible from within the park, it does form part of its setting, revealing evidence of the impact landowners had on the landscape, and forming part of the informal parkland context.'

'7.8.32 ... The southern part of the drive is included within the scheme boundary. While there will be no development along the drive, it does extend on both sides. Impacts have been limited through enhancement planting of the drive. This has been designed to supplement what is already there and reinstate vegetation which has been lost. Nevertheless, the Scheme will change the character of the wider parkland which forms the setting of the RPG and may be visible along the former main drive. As such, the Scheme is likely to have a medium magnitude of impact, resulting in a moderate adverse effect on this asset of medium value.'

The scheme's underlying assumption seems to be that as Chippenham Park is 'only' Grade II registered, and hence of 'medium value', impacts can only be correspondingly 'medium'. Chippenham Park is remarkably coherent, both visually and topographically, for a designed landscape and has a strong, distinctive presence within its surrounding area. It is very important locally and the report's own definition of medium change still acknowledges that this constitutes a 'noticeably different change to setting affecting significance, resulting in erosion in our ability to understand and appreciate the asset.' That is in plain terms a harm.

The impact is most acute where the south drive extends beyond the perimeter of the park proper, as this effectively bisects West Site A. There is no indication on the 1:17500 scale figures of how closely W04 and W05 will encroach upon the drive, but clearly the wider the buffer the more effect it is likely to have. It should also be noted that even if the scheme proposes to restore planting along the drive, it cannot itself constitute screening: an avenue by definition is a sequence of trees at regular intervals and depends upon space for its effect. Further information will be required on these points to demonstrate that the conflicts have been mitigated as far as possible."

Archaeology

SCC and CCC officers are engaged in an ongoing workstream to determine the acceptability of AECOM's trial trenching proposals. The site contains areas of high archaeological potential, and it is necessary for the promoter to provide sufficient trial trenching coverage to ensure that impacts on below-ground heritage assets can be mitigated by detailed design.

Archaeological trial trench evaluation will enable any sites of national significance which warrant preservation in situ to be identified, to allow archaeological mitigation strategies to be defined at the earliest opportunity and to ensure that archaeological findings are taken into consideration as the scheme design is refined. Not undertaking sufficient archaeological assessment at pre-consent will mean that the nature, extent and significance of below ground archaeological remains will not be fully understood. This will also mean that insufficient information will be available to allow informed planning decisions to be made regarding the impact of proposals on below ground heritage assets.

Mitigation requirements cannot be defined without full evaluation. There needs to be a commitment to undertake archaeological mitigation- either preservation in situ or full excavation-across the entire development area and factor that possibility into project programmes, given that the extent of the archaeological resource is currently unknown and the worst-case scenario approach.

The Councils are pleased that a geophysical survey has been undertaken, although there are a number of key land parcels which have not yet been able to be surveyed. It is essential that the outstanding areas circa 74.6ha in Zone B and 19.4ha in Zone C, 113ha of land on the cable route or in the 10ha required for HV connections, which leaves a total of 217ha to revisit (plus any additional elements of the scheme which have since been added into the red line boundary) are surveyed. This work should be undertaken as a priority at the earliest opportunity- before DCO submission- given that they include high archaeological potential areas, in key sections which have limited flexibility. It is presumed that this work will be submitted

as part of the Environmental Statement, but it would be preferable for the Councils to see the preliminary results as soon as they are available.

If the promoters wish to undertake an 'avoidance' mitigation approach to below ground heritage where possible, they cannot finalise the design without having fully defined all the surviving below ground heritage assets which will be impacted upon by different elements of this scheme. The Councils are extremely concerned that further scheme refinement is being undertaken without sufficient archaeological assessment to inform this work. There is still 217ha of outstanding geophysical survey. Where geophysical survey has defined a number of anomalies likely to be archaeological in nature, their nature and significance is not understood, and this survey will not have defined all below ground heritage assets (for example, due to masking factors or feature types which might not show up well). As a result, there is also high potential for additional unknown archaeological remains to survive throughout the scheme red line boundary area which are of high significance, including a potential for human remains, funerary monuments and settlement. The geophysical survey undertaken to date is a considerable commitment and achievement, but it needs 'ground truthing', as part of a suite of techniques.

It is strongly advised that all elements of the scheme should be subject to archaeological trial trench evaluation. Several of the anomalies defined during geophysical survey which are likely to be archaeological in nature are situated in key areas of the project where flexibility is limited or are of a scale that they cannot be avoided. Therefore, understanding the nature and significance of these remains through trial trenching is essential before planning decisions can be made. The Environmental Statement should set out the approach to any outstanding archaeological evaluation which is required, alongside mitigation.

The Councils wish to highlight the severe risk to extremely tight project timetables by leaving the second phase of evaluation until post consent which means that archaeological mitigation requirements will not be able to be defined until this point. Delays are possible if extensive areas requiring archaeological mitigation are defined.

Insufficient assessment has been undertaken to determine the full scope and significance of heritage assets and therefore the impacts of different elements of this scheme. Many of the statements presented in this chapter are assumptions based upon insufficient assessment to support these conclusions. The potential for additional unknown remains is also not clearly set out. There are additional scheme elements which have the potential to impact upon archaeological remains which are not considered here.

Significant portions of information related to Archaeology is out-of-date and does not reflect the discussions the Councils have had with the promoter since the non-statutory consultation in 2019. In particular the Desk-Based Assessments (DBAs) are dated from April 2019, and use the original scheme boundaries as proposed at that time. This excludes many of the sites in Sunnica East A which are of the highest sensitivity and with the greatest known archaeological potential. The DBAs contain data from the Historic Environment Record which is two years out-of-date.

Additional areas now included into the red line boundary, including revisions to the red line boundary area for PV array fields, compounds, substations, cable route etc. and for scheme elements including new access roads, internal roadways, laydown

areas, compounds, ecological mitigation, landscaping and planting, site access etc., need to be included in all assessments going forward into the Environmental Statement.

As such, the assessments relating to archaeological impact in the PEIR cannot be agreed unless these DBAs are updated and the assessments are made on the basis of the proposal as it stands today. We would encourage the promoter to ensure the DCO proposals reflect and capture all discussions which have taken place to date.

Archaeology should be factored into traffic management, water management, dust and spoil management, landscape management, ecological works plans etc., as proposals have the potential to have archaeological impacts. To avoid conflicts between different priorities and proposed mitigations for other aspects, a joined-up, holistic approach is needed. Archaeological matters, as well as being in the Written Scheme of Investigations (WSIs), should be considered in RAMS documents and Construction Environmental Management Plans, Materials Management Plans, Decommissioning Environmental Management Plans etc. Logistical considerations should be reflected throughout for instance:

- Spoil management associated with archaeological work should be factored in;
- Plant movement should be factored into traffic assessments;
- Ecological implications of pre-construction archaeological work should be considered.

Impacts connected with linear pipelines and cable trenches typically surround the temporary works more than the trench itself: the stripping of working easements (usually between 15-30m working widths) to subsoil depths in order to enable vehicular movements for multiple crews to lay the cable and for the erection of compounds, soil stores and welfare. The damage caused to archaeological sites of vehicles traversing the exposed surfaces of archaeological features is substantial, especially where the evidence relates to buildings, burials or votive sites.

Some preliminary discussions have taken place to seek to reduce or eliminate the stripping of easements by the use of ecogrid of a suitable grade that will enable vehicles to traverse the site alongside the cable, restricting stripping to a far narrower impact width than typically specified. Operating a new way of working will provide the Sunnica project with greater environmental credentials and will have the additional benefit of reducing the need for hundreds of evaluation trenches to check the geophysical survey results, which, though valuable, are not a perfect science.

Local authorities will work to ensure that this restricted easement requirement is included in mitigation strategies and the CEMP prepared for this scheme's DCO application. Reducing stripping would have a tripartite purpose:

1. to reduce the need for largescale evaluation trenching, saving this for where it is most essential;
2. to reduce damage to archaeological remains and concomitant costs for excavation;
3. provide a measurable environmental benefit to the scheme by reducing carbon emissions from multiple stages of machine excavation and soil movements.

Insertion of the cable by drilling is considered for special sections of its route: road/rail/river/infrastructure crossings, but would provide greater benefits to archaeological landscapes if rolled out more extensively - the carbon cost of which

would have to be modelled alongside that for traditional open cut cable laying in stripped working easements. Under current climate change agendas, all major construction schemes should have greater regard to this aspect of construction and reduce pollution from carbon emissions as far as possible.

Sunnica East Site A (PEIR Fig 3.1)

The west part of this site is partly in Isleham parish, Cambridgeshire, the larger part of this site being in West Suffolk. In Cambridgeshire it will include a large solar field (E05) fringed with woodland and native grassland on the north west and south sides and a large area to the south where a significant, complex archaeological site will be fenced off from all construction traffic/use and preserved *in situ* with long-term management under new grassland. This site is recorded as undated cropmarks in the Cambridgeshire Historic Environment Record database (CHER ref MCB27640) but geophysical survey conducted for the PEIR has enabled a far greater understanding of the scale and character of the evidence and relate it, morphologically, to the Roman period though with prehistoric elements too. The removal of this site from plough cultivation is highly recommended and very welcome.

The archaeology of Isleham is well known for its richness at fen edges and in the river vallies, where high water tables and relict peat soils and alluvium have aided the survival of organic remains and through intermittent preservation of old land surfaces and prehistoric occupation in the many undulations in the chalk 'upland' of the parish. Understanding these area and their potential can only occur through physical evaluation (trench based), which is yet to occur. Elsewhere, soil deposits are thin, typical of chalk landscapes, and archaeological sites have been severely damaged by ploughing and show as scatters of artefacts on field surfaces or from aerial photographs at suitable times of year.

Sunnica East Site B (PEIR Fig 3.1)

This site, near Freckenham and Worlington, is entirely in Suffolk and not further discussed here.

Sunnica West Site A (PEIR Fig 3.2)

This large area of grouped solar fields lies between the A14 north-east of Newmarket, south of Chippenham Park - the designated 18th-19th century pleasure gardens of Chippenham Hall (National Heritage List Entry 1000615), and in fields straddling the A11 in Kennett parish.

A battery energy storage system (BESS) and substation will be centrally located in the large solar fields. Five archaeological areas are proposed for preservation *in situ* by removing them from cultivation, managing them under grass and preventing construction impacts of any kind within the selected areas. These areas were defined by geophysical survey and relate to prehistoric burial grounds and large occupation sites, mostly of late prehistoric to Roman date. North of the A14, the southern part of the linear tree lined avenue that formerly led to the Gallops at Newmarket from Chippenham Hall (CHER MCB8994) will be preserved as a landscape feature and enhanced with new woodland planting. The avenue once formed the east side of RAF Snailwell (CHER MCB15150) on which part of the solar fields will be placed.

We agree with the areas selected for preservation and will continue to work with the Sunnica project team to ensure that the land management strategies are appropriate

for the conservation of these sites: both for the construction period and the lifetime of the energy farm.

Sunnica West Site B (PEIR Fig 3.2)

In Snailwell parish, to the south-west of Chippenham Fen Nature Reserve, an area of former wetland in the floodplain of the River Snail has been selected for this significantly smaller solar site, to the south of the grounds of Fordham Abbey (MCB14463). Proposals show that the archaeological remains in the centre of the area would be preserved under grassland and be surrounded by smaller solar fields to the east, west and south. Wetland restoration would arc around the solar fields on the north, west and south sides.

This wetland fringe, together with existing woodland would separate the site from Roman villa settlement designated as a nationally important Scheduled Monument (NHLE 1006868), providing a buffer between it and the solar farm. Historic England will have presented their opinion on the character of the buffer and suitability of development to the Sunnica project team.

Our concerns surround the potential impact of perforating wetland deposits in which ancient organic archaeological remains might be preserved (in the floodplain/fen area) and in so doing risk their dewatering, degradation and loss of palaeoenvironmental and organic content. Evaluation trenches will be needed to assess the deposit sequences and palaeochannels surviving in this archaeologically sensitive area, as shown in the CHER records, to validate or dispel this concern, to determine whether development is suitable here and to refine the mitigation solutions for development and its scale in this location. Piled PV panel foundations can be replaced by concrete shoes where ground conditions and archaeological evidence dictates, but it is too soon to comment on the best approach to such strategies. This area, however, should be classed as highly sensitive until further, tangible evidence has been acquired.

Sunnica Cable Route to Burwell Substation

A 132kV underground cable will connect all of the solar farm areas to the Burwell National Grid Substation. It will be buried in a 1.2m wide trench to a depth of around 2m below the ground surface.

Impacts connected with linear pipelines and cable trenches typically surround the temporary works more than the trench itself: the stripping of working easements (usually between 15-30m working widths) to subsoil depths in order to enable vehicular movements for multiple crews to lay the cable and for the erection of compounds, soil stores and welfare. The damage caused to archaeological sites of vehicles traversing the exposed surfaces of archaeological features is substantial, especially where the evidence relates to buildings, burials or votive sites.

Some preliminary discussions have taken place to seek to reduce or eliminate the stripping of easements by the use of ecogrid of a suitable grade that will enable vehicles to traverse the site alongside the cable, restricting stripping to a far narrower impact width than typically specified. Operating a new way of working will provide the Sunnica project with greater environmental credentials and will have the additional benefit of reducing the need for hundreds of evaluation trenches to check the geophysical survey results, which, though valuable, are not a perfect science.

CHET will work to ensure that this restricted easement requirement is included in mitigation strategies and the CEMP prepared for this scheme's DCO application. Reducing stripping would have a tripartite purpose:

1. to reduce the need for largescale evaluation trenching, saving this for where it is most essential;
2. to reduce damage to archaeological remains and concomitant costs for excavation;
3. provide a measurable environmental benefit to the scheme by reducing carbon emissions from multiple stages of machine excavation and soil movements.

Insertion of the cable by drilling is considered for special sections of its route: road/rail/river/infrastructure crossings, but would provide greater benefits to archaeological landscapes if rolled out more extensively - the carbon cost of which would have to be modelled alongside that for traditional open cut cable laying in stripped working easements. Under current climate change agendas, all major construction schemes should have greater regard to this aspect of construction and reduce pollution from carbon emissions as far as possible.

Review of the PEIR Chapter 7: Cultural Heritage - direct response

7.4.4 Correction: Aerial photographic transcriptions have not taken place owing to the temporary closure of the national repository of aerial archives for archaeological research due to the Covid-19 pandemic. Other aerial and satellite sources have not been examined. This work is vital as it provides additional information that enables the landscape context and geomorphological setting of archaeological sites to be better understood than from geophysical survey data alone. These surveys are typically carried out together as their joint benefits allow greater understanding of the archaeological resource and geomorphological setting.

7.4.4 and Table 7-3 Portable Antiquity Scheme data has not yet been acquired for the Cambridgeshire Sites. I believe work is in hand and we have contacted the British Museum's PAS office to assist the Sunnica project team with this

7.4.6 It is more accurate to consider that work is still in hand to agree the evaluation trenching strategy. Non-intrusive work for geophysical survey only has occurred, the trenching work remains in discussion.

7.6.93 Geophysical Survey Zone G - this technique is not recommended for wetland areas, trenching will be required to be undertaken by professionals used to working in wetland areas, supported by geoarchaeological investigation and research. That said, that site evidence was found suggests that there are localise high spots within the floodplain and/or that this part of the floodplain as been significantly drained.

7.6.111 Table 7-9: It is important to note that the physical archaeological evidence reported in this table (and others) has been acquired through physical excavation. These sites were unknown prior to development-led archaeological programmes secured by planning conditions. Most of the non-designated CHER data in this area related to cropmarked sites, field finds and historic buildings and their settings. The significant contribution of investigative fieldwork, including palaeoenvironmental investigation to revealing buried archaeological evidence serves to be fully noted.

7.6.121 – no archaeological evidence is yet known, probably owing to the character of deposits at the Burwell fen edge.

7.7.6 – Further mitigation measures outlined here are as have been discussed and will be carefully considered following the proposed trench based evaluation of scheme areas.

Table 7-10 Summary of mitigation measures for cultural heritage:

General section (page 7-42): officers from Historic England do not assess trench locations for schemes setting out to evaluate non-designated archaeological evidence. This is a matter for local authority archaeology services. HE's science advisers do supply valuable advice regarding the application of scientific techniques for archaeological investigation and this advice is highly profitable to archaeological enquiry at all levels.

7.8.10 "Those non-designated assets within the baseline that comprise either discrete findspots or metal detector finds are considered to be no longer present within the Scheme and there would therefore be no impact upon them." This statement is commonly contained within desk-based assessments and can be quite wrong in its assumptions. It is agreed that the individual artefacts are no longer in situ, but their value is to highlight the presence of potential underlying sites, particularly when there is aggregated value to a field scatter, or denote early prehistoric activity or from finds recorded by responsible hobbyist metal detectorists (sometimes these point to unknown burial grounds). For this reason, the PAS data is required to be acquired from the British Museum and assessed for Cambridgeshire, and greater consideration of the significance of find spot evidence. Agreed, this should not be exhaustive but their dismissal from further attention is unwise.

An example of such a scatter site is in Table 7-13 where MCB9032 "Iron Age and Roman finds scatter" and MCB9033 "Bronze Age material recovered including burnt flint. Some gravel, also dark area." These are attributed a low value in the report as they are in longer *in situ*. This is a basic error of judgement as it fails to recognise what the presence of this type of occupation evidence signifies in terms of potential homestead or village remains, the scale of which cannot, of course, be imagined from single find spots. Given that there is no general accord with this method of assessment, the associated designations/value given to Magnitude of Impact upon the remains (Very low) and Effect Category (Minor) or Significant Effect (No) do not follow. Surface finds or find spot information is not given due consideration in this method of appraisal as the preliminary assumption regarding 'value' is flawed.

See also page 7-50 (for example) Summary of Magnitude of Impact and Significance of Effect tables that provide subjective sensitivity values. These do not always accord with CHET's opinion (eg Table 7-12: MSF10199 Single ring ditch, (approximately 30m diameter) identified from on 1956 aerial photograph. Sensitivity (value): Low Ring ditches of this size typically denote barrows – *tumuli* – the quarry ditches encircling the burial area covered over with an upcast mound. Not low value

Only where geophysical survey has contributed site evidence to the record (for example MCB20063 in Table 7-14) have the Magnitude of Impact and Effect Categories of the scheme upon the remains considered to be significant - shown as High and Moderate. This is an extremely biased assessment of the value of known

data and will only be altered by the results of evaluation trenching, after which these tables should be corrected.

No synthesis of the surface finds evidence has been made to highlight the potential for underlying sites being present, they have merely been considered as individual artefacts, now gone from the site with no further significance. This is archaeological interpretation at its worst.

The opinions given for harm to non-designated remains for the cable connections (7.8.56, 7.8.61) and to the Burwell substation extension: 7.8.65 "As there are no heritage assets in this area within the footprint of the substation extension, there are no direct impacts to heritage anticipated from this aspect of the Scheme. Further information regarding the presence or absence of archaeological remains will be obtained through trial trench evaluation works with appropriate archaeological mitigation proposed following these works (if warranted)."

At a fen edge location, it is unwise to predict that no archaeology will be present. The highlighted part of the statement above is flawed. It would have been apposite to consider the effect *unknown* until the completion of non-intrusive surveys (aerial photograph transcriptions, PAS data review) and physical evaluation had occurred. We place considerable emphasis in assessing fragmentary evidence of the historic environment by period, alongside each other and the landscape settings in which they occur to enable predictions to be made about what might lie beneath the soil based on their interpreted value.

Ecology

Introduction

Documents reviewed

- Preliminary Environmental Information (PEI) Report: Chapter 8 Ecology
- All appended ecology reports, including unredacted breeding birds
- Construction Environmental Management Plan
- Landscape and Environmental Management Plan
- Parameter Plans
- Other relevant chapters of the PEI accessed for supporting information but not assessed

Consultation

During the course of this review, the following organisations have provided input:

- Wildlife Trust BCN
- Natural England
- RSPB
- West Suffolk Council
- Suffolk Wildlife Trust
- Suffolk County Council

Key Findings

Baseline surveys appear to have been carried out to a high standard (although terrestrial invertebrate surveys are not yet complete and cable connection routes are not yet surveyed).

The Ecology chapter of the PEI is lacking important detail. Specifically, inadequate characterisation of impacts and unjustified exclusion of ecological features from detailed assessment. Detailed assessment fails to address all potential impacts and relies heavily on the CEMP and LEMP for mitigation, which in themselves are lacking crucial details.

There has been insufficient adherence to the Mitigation Hierarchy, specifically with respect to the avoidance of important habitats and species. The scheme needs to be redesigned to avoid impacts on important habitats and species. Habitat creation proposals are lacking details, such as how they link to form a coherent nature network and their long-term management regimes.

Lack of any information regarding the decommissioning phase and how this will impact on newly created habitats and their long-term survival (i.e. beyond 40 years).

Opportunities exist to deliver enhancements and benefits, should the scheme be delivered, and these should be explored much further at this early stage in the process and incorporated into the final submitted scheme.

What changes to the parameter plan layouts would we like to see?

- Retention of the whole of the area of habitat supporting scarce arable plants judged to be of County importance (within Sunnica West A).
- Retention of areas T7, T8, T9, T13 and T14 which have been assessed as being of County importance for flora (as shown on plans in Appendix 8B: Flora Report).
- Retention of fields found to support nesting stone curlew, with appropriate areas of connected foraging habitat also retained (more could be delivered as part an enhancement package).
- Removal of area E23 from the solar farm infrastructure (shown on Parameter Plan 3.1) as its current inclusion will result in the loss of County importance acid grassland.
- Wider set-backs from external boundaries; we suggest 20m rather than 5m.
- Undeveloped mitigation areas for habitat creation to deliver a coherent and connected network of habitats, specifically designed to deliver for biodiversity, as opposed to individual parcels/strips of land 'fitting in' around the edges of the solar farm infrastructure.

- More details of the locations of specific types of habitat to be created (rather than the broad-brush 'Native Grassland Planting'), showing where these are being created and how they are connected.
- Appropriate mitigation for skylark, including provision of replacement habitat offsite if this cannot be retained onsite.

Potential benefits that the development could deliver

Improving connectivity between Chippenham Fen and Snailwell Meadows. The wetland grassland proposed at Sunnica West B represents an opportunity to improve connectivity between Chippenham Fen SSSI and Snailwell Meadows SSSI. This would be a positive gain for the area. However, it can only be considered as such if it is committed to on a long-term basis. At present, there is no clarity regarding what will happen to areas within the DCO site post-decommissioning, and this includes habitats created as part of the scheme's compensation/enhancement package.

Habitat for turtle doves. Turtle dove was recorded as possibly breeding within the survey area, and the DCO site does fall within the RSPB's Operation Turtle Dove area. Targeted enhancements for this species will tie in with other species enhancements (such as stone curlew, as well as a variety of invertebrate species) as foraging habitat for turtle dove works best on areas of retained open ground, with patches of bare earth, sown with an appropriate seed mix. The proposed retention of hedgerows is good for this species, and it may be appropriate to also allow scrubby areas to develop / infill gaps in hedgerows to provide better nesting habitat, and also create ponds for birds to drink from.

Improvements to watercourses. The LEMP makes mention of possibilities to improve watercourses associated with the DCO site. More details and a commitment to such initiatives could benefit a range of species, including water voles.

Research opportunities. Given the size of the proposed solar farm and the apparent lack of research into impacts on wildlife, this application would represent an opportunity to lead on UK-based research into the operational impacts of solar farms on wildlife. The potential impacts on varying taxa may be adverse, beneficial or neutral, but any additional research to build on current understanding would be beneficial. This represents an opportunity for the promoter to demonstrate industry leadership in an important and currently under-researched area of ecological impact assessment. It is an area whereby the development, if it proceeds, can deliver wider-reaching positive outputs and thereby increase its societal benefits. It is recommended that a commitment to a specified package of relevant ecological research proposals is included within the application.

Specific comments on the Ecology chapter (ecological impact assessment)

Overall comments

Whilst it is acknowledged that this is a preliminary assessment ahead of the full Environmental Statement, its Methodology section is clear that it is an ecological impact assessment and is following the CIEEM (2018) Guidelines for Ecological Impact Assessment in the UK and Ireland. The following comments have been made in expectation of the Ecology chapter providing an ecological impact assessment utilising the extensive survey data collected and the scheme design details presently available.

The approach presented in the preliminary impact assessment in the Ecology chapter currently does not follow CIEEM (2018) standards:

- The assessment should aim to characterise ecological impacts: extent, magnitude, duration and frequency. All these should be quantified where possible, for example to give areas of habitat to be lost or % changes to areas of habitat or estimated proportions of bird territories affected.
- Durations should be expressed in months / years.
- Use of the phrases 'short term' and 'temporary' are used throughout the assessment and are never quantified or explained in the context of what that means for the specific ecological features being assessed (some ecological features may be more sensitive to short term impacts than others).
- Insufficient detail is given regarding the mitigation measures and/or compensatory habitat, upon which the conclusions of the impact assessment are hinged.
- Insufficient regard to cumulative impacts.

Comments regarding the evaluation of designated sites:

- Chippenham Fen and Snailwell Poor's Fen, including Fenland SAC, Chippenham Fen Ramsar / NNR, Chippenham Fen and Snailwell Poor's Fen SSSI. The Ecology chapter does not make reference to any published research regarding the potential for operational impacts on the adjacent European Site. For example, there is no evidence that consideration has been given to Natural England Evidence Research (2017) which discusses the potential for aquatic invertebrates to confuse reflected polarised light from the panels for water. This receptor should be taken forward for more detailed assessment.
- Havacre Meadows and Deal Nook CWS. The Ecology chapter says that the installation of required infrastructure will be done via tunnelling underneath the CWS. Does the promoter have any previous experience or examples where this has been successfully done? In the absence of such previous experience, how will the promoter plan for unforeseen problems that may occur? This receptor should be taken forward for more detailed assessment to consider all possible impacts on the CWS.
- Worlington Heath CWS and Badlington Lane CWS. These are within the DCO boundary and it is stated that these will be retained and protected, however,

the Landscape Masterplan / Parameter plans show these areas as under native grassland planting. This receptor should be taken forward for more detailed assessment.

- Joans's Meadow CWS and Worlington Golf Course CWS are on the DCO boundary and Landscape Masterplan / Parameter plans show potential provision of permissive routes around these. Where is the assessment regarding the potential for recreational disturbance due to increased walkers around these sites? This receptor should be taken forward for more detailed assessment.
- No consideration has been given as to how the construction and operational phases could cause recreational impacts on designated sites through potential changes to:
 - public access
 - avoidance of local area during construction (sending the public elsewhere)
 - loss of access
 - newly created public access

The site is located within the buffer around Breckland SPA within which in-combination recreational effects are a concern. The potential effects of loss of recreational access in the vicinity of existing settlements as a consequence of this development should be assessed.

Comments regarding the ruling out of the following features for further evaluation:

- 'Aquatic Macro-invertebrates'. The Ecology chapter does not make reference to any published research regarding the potential for operational impacts on relevant receptors. For example, Natural England Evidence Research NERR012 (2017) discusses the potential for aquatic invertebrates to confuse reflected polarised light from the panels for water, yet this has not been considered within the Ecology chapter.
- 'Wintering birds' and 'Wintering skylark'. Permanent loss of arable habitat (and some temporary loss of hedgerows) would appear to inevitably result in some effects on the wintering birds that have been found to use the site. As well as a direct loss of habitat, there could be impacts from noise during construction (which is defined in Chapter 3 as a period of 24 months). Whether or not these are significant is not clear, but this receptor should not be excluded from further assessment, in order to provide clarity. Reference is made to 'undeveloped mitigation areas' but no further information is supplied as to specifically how these will deliver habitats for wintering birds.
- 'Bats'. The chapter states that 'there will be no loss of important habitats used by bats anywhere in the DCO site'. By 'important' does this mean the habitats scored as 'high' in the Bat Report (Appendix 8G)? It's not clear how the statement in the Ecology chapter links directly to the data collected in the field surveys and query why there are maps highlighting areas of most (and least) value for potential bat roosts, but not for commuting and foraging habitat. This needs further exploration. Use of thresholds for defining levels of bat activity must be used with care due to differences in the detectability of

species and query whether such thresholds should be tailored for individual species/groups of species to take account of this. In terms of impacts, habitat loss is not the only one – what about consideration of lighting and noise disturbance? As set out below, the CEMP does not deal with these impacts to a point where they can be discounted from the assessment.

Assessment of impacts and significance of effects on receptors

Direct loss of unimproved acid and semi-improved acid grassland

The Ecology chapter says that there will be direct loss of acid grassland and that this will result in a temporary short term impact. There is no qualification as to what is meant by 'short term'. Impacts need to be characterised and quantified wherever possible (CIEEM, 2018).

On what basis are the impacts in acid grassland considered to be temporary? This is not discussed. Presumably it relates to the fact that there are proposals to create/restore new acid grassland but no details are given regarding proposed compensatory habitat.

There is no quantification of how much acid grassland will be lost, how much this is as a % of the total existing on the site and how much will be restored/created in compensation.

There is no indication of when it is expected that created/restored habitats will be of a quality such that they can be considered as providing a compensation for that which has been lost.

Has an analysis of soils been undertaken to demonstrate there are suitable areas available to create habitats of the same quality as those being destroyed?

There are no details/commitment to how they will be managed long-term.

Taking all this into account, it is unclear how the conclusion of 'temporary' impacts can be justified, or that the effects from the project will not be adverse or significant.

Direct loss of semi-improved calcareous grassland – same comments as for direct loss of acid grassland.

Direct loss of marshy grassland - same comments as for direct loss of acid grassland.

Direct loss of arable habitat supporting notable arable flora

The Ecology chapter says that there will be direct loss of arable habitats, particularly field margins, supporting notable arable flora and that this will result in a temporary short term impact.

There is no quantification of the areas of arable habitat to be lost (i.e. how many ha of County importance arable habitat, how much District level, and Local level?).

There is no detail as to how much is being lost as a percentage of the total existing on the site nor how much will be restored/created in compensation.

The chapter says 'it is possible that construction activities will create ground disturbance that may benefit arable flora during the construction in certain areas'. Whilst this may be true, a much more definitive statement regarding what can confidently and realistically be delivered is needed within an ecological impact assessment. Furthermore, what happens once construction is complete? As discussed further below, there are no details in the LEMP regarding the creation and management of arable habitat, including, crucially, how the required conditions, such as ongoing ground disturbance, will be provided.

Therefore, the report provides no explanation of how the loss of this habitat type (including that of County importance) can be compensated for, such that it will result in the stated negligible effects.

Direct loss of habitat supporting notable terrestrial invertebrate species and assemblages

When will compensatory habitat be of sufficient floristic diversity or suitable habitat structure such that it can support the invertebrate species and assemblages recorded on the site?

Specifically, which areas of habitat creation shown on the Landscape / Parameter plans are envisaged to provide replacement habitat for the invertebrate species affected?

How do the areas of habitat proposed link up to provide connectivity? Whilst compensatory habitat is developing, can the species affected survive on remaining areas of habitat? And if so, where are these areas and how big are they? Otherwise, there is a risk of species being lost permanently from the area, even if the habitat loss is temporary.

Temporary loss of stone curlew breeding habitat and Disturbance to stone curlew
Sunnica East development will displace up to four pairs of breeding stone curlew. One pair of stone curlew are considered to require 16ha of good quality breeding habitat. This would equate to approximately 65ha of habitat required. It is understood that the proposals would deliver approximately 70 ha of habitat in the undeveloped mitigation areas (plus an additional 10ha of specific stone curlew plots). This would superficially appear to potentially be a large enough area of replacement habitat. However:

- These areas do not form a particularly coherent network of habitats, with poor connectivity in many places and do appear to be areas 'added on' around the edges of the solar farm infrastructure, rather than specifically designed to deliver for biodiversity.
- How has the level of disturbance in these areas been assessed? Disturbance to nesting stone curlew could result from the operational maintenance activities

on the solar farm or from areas of replacement habitat being provided close to roads or well-used footpaths, including proposed permissive paths.

- The proposals for acid grassland creation would appear to aim to deliver a suitable habitat structure (suitable sward height and areas of bare ground) but no quantification is provided as to how much of the undeveloped mitigation areas will be acid grassland, as opposed to semi-improved grassland which would likely have a denser sward (more suitable for foraging than breeding). Therefore, despite the figures looking suitable, much of the newly creation grassland may need to be discounted from the calculations as it may not provide suitable breeding habitat.
- No information is provided regarding the specifics of the three stone curlew plots, so it is not possible to understand their suitability in terms of distance from sources of disturbance, linkage to suitable foraging habitat, how they will be managed long-term to retain suitability.

The construction phase is stated to take two years. This is a significant period of time during which there will be high levels of disturbance (despite the intentions of the CEMP). Stone curlew can be slow to return to breeding areas after displacement and so how will the construction disturbance affect the overall stability and size of the wider stone curlew population?

The HRA Screening report references the Breckland Local Plan (2017) which takes 3km as the maximum distance over which stone curlews outside the SPA can be considered to be functionally linked to the SPA site. However, research undertaken since that time has demonstrated stone curlews travelling up to 5km from nest sites during the breeding (unpublished manuscript under review, Hawkes *et al*) and observations of colour-ringed birds shows movement of stone curlews between the development site and the SPA. This demonstrates a link between Breckland SPA and habitats over a greater distance than the previously defined 3km buffer, to the extent that they may have an important role in maintaining or restoring the population of the qualifying species (stone curlew) at favourable conservation status. At their closest, the stone curlew nesting in the DCO site were 3.2km from Breckland SPA.

Taking all this into account, we would dispute the findings of impacts on stone curlew as being temporary and not significant.

Furthermore, the updated research relating to stone curlew movements around the Breckland SPA should prompt a revisiting of the Stage 1 HRA Screening report. If deemed to result in 'likely significant effects' on stone curlew, these will need to be considered within the Stage 2 Appropriate Assessment.

Breeding bird assemblage

The undeveloped mitigation areas appear to be providing replacement habitat for a very large array and diversity of displaced species and there is no clarity regarding the carrying capacity of these habitats and whether they realistically can deliver for all taxa affected.

Is there evidence that species such as skylark will nest under solar panels at the density proposed at this site? If so, this should be presented and discussed. Details of how displacement of Skylark will be mitigated / compensated for, e.g. by provision of Skylark plots at an equal or higher number than any lost to the scheme, should be considered.

The timing of when the replacement/compensatory habitats will be available for breeding birds is not given. There is no discussion regarding how temporary the loss will be and how the bird species affected will fare in the intervening period. This is exacerbated by the two year construction phase and associated disturbance.

There is no discussion relating to potential operational impacts on breeding birds, with no reference to any published literature which discusses how birds may be affected by solar panels (e.g. birds trying to drink from solar panels, collision risks) or examples of successful breeding bird habitat created between panel arrays.

Cumulative Assessment

The study breaks the scheme into component sub-sections (West A and B, East A and B, Cable routes) and whilst this may have been useful for the initial survey reports, in terms of assessing impacts, these need to be brought back together: there is no proposal to develop only parts of the scheme, it is a whole package.

Construction Environmental Management Plan

Lighting – The Bat report states that the site is of 'up to County importance for bats', including County/District importance for foraging and commuting barbastelle, common and soprano pipistrelle. Therefore, such areas of habitat need to be protected from disturbance, including lighting. The same is true of potential bat roosts. This necessitates a highly robust approach within the CEMP document. However, the CEMP in its current form does not make a specific commitment not to illuminate important bat flight lines, foraging habitat or potential roosts, nor other habitats that may be of importance for other nocturnal wildlife. Given that the Ecology chapter relies on the CEMP for its conclusion of 'no significant effects on bats', the CEMP contains insufficient detail to allow such a conclusion to be made. The CEMP states in relation to lighting '*controls on lighting/illumination to minimise...potential adverse effects on...bats will be considered as far as is reasonably practicable*'. We would expect that important / potentially important bat habitat, in all its forms would be identified and highlighted as areas to be kept dark (no change to existing baseline) during both construction and during the operational phase of the solar farm. If this is not possible, then the Ecology chapter needs to identify and highlight that there is potential for significant adverse effects on bats, providing an adequate level of detail so that it is understood how the various species of bats will be affected by the different phases of the project.

Noise – The CEMP states, in relation to noise, that 'Best Practicable Means will be applied, as far as is reasonably practicable'. Given the unspecific nature of the reduction measures set out in the CEMP, we would expect the effects of noise disturbance, in particular on birds, to be more fully explored within the Ecology chapter.

Reliance on a CEMP to rule out an assessment of impacts within an EcIA would not appear to follow best practise; a CEMP is not an integral part of the design of the development.

Outline Landscape and Ecology Management Plan (LEMP)

Some of the habitats that will be lost require a big commitment to maintain them long-term and so we question the feasibility of re-creating them and would urge consideration be given to keeping and protecting what already exists (avoid impacts in the first place), allowing existing land management regimes to continue in these areas. We have provided further details below.

We would like to see a commitment to grazing, as this seems the only solution to create and maintain the conditions required by the majority of the various grassland habitat types. The LEMP correctly states that grazing is generally preferable to mowing. Therefore, a clear commitment to grazing is required, in order to accept that the habitat creation proposals will truly deliver what they set out to. Unfortunately, many solar farm applications have promised the creation of flower-rich grasslands, to be managed by grazing, but have failed to deliver the promised habitat benefits, instead creating grasslands among the solar panels that are heavily shaded, affected by rain shadow and manged by regular mowing and herbicides. Changes may be needed to the height of the solar panels to allow sheep grazing and these aspects need to be considered now.

Arable Flora: The LEMP talks about maintaining valuable field boundaries for arable flora. However, it is envisaged that rotavating the ground / use of other mowing machinery will be unlikely to be carried out due to the potential for debris/stones to kick up and damage the solar panels. The time involved in tracking such machinery in and around the lines of panel arrays would also seem to make it unlikely to happen in reality. It seems unrealistic that the required ongoing ground disturbance will happen year after year around the solar farm infrastructure. Therefore, in the case of arable flora, we cannot see how suitable habitats can be created and maintained within a solar farm. Ground disturbance is key to maintaining favourable conditions for these plant species and no demonstration of a feasible approach to long term habitat management has been provided.

Marshy grassland: No details are supplied within the LEMP as to how this habitat will be created. The Ecology chapter (para 8.7.2) says the project 'will consider suitable water level management' and 'alternatives [to abstraction from the River Snail] will be considered'. This statement fails to provide any definitive explanation for how the

proposed grazing marsh will be created. Without the correct underlying hydrology, this type of habitat simply will not exist.

Decommissioning

How does the promoter ensure the survival of compensatory habitats beyond the 40 year lifespan of the Solar Farm?

Even at this outline stage, it seems reasonable to be provided with a better understanding of the plan beyond 40 years. Given the exceptional size of the land within the DCO, it would seem reasonable / pertinent to require more details about the decommissioning process. Whilst it is accepted that the details of this will be a matter for a separate assessment nearer the time, given the huge amount of land involved, it is considered appropriate at this stage to request information on what is proposed for the land (or even just some specific key areas of the site) after decommissioning. For example, whether there is any commitment to retain the compensatory grassland and arable habitats to ensure they survive beyond the 40 year lifespan of the solar farm.

Forty years is not a long time in landscape planning / management terms and it is not appropriate to avoid considering what will happen beyond this point. The end of the project is very much a crucial part of the decision-making process, and not something that should be left out of the assessment. Otherwise it is very possible that long-term, there could be a net loss to biodiversity across this varied landscape, which would affect large areas of both Cambridgeshire and Suffolk. If this is a possibility, then it needs to be highlighted in the impact assessment.

A stronger, clearer vision for the site should be provided for the post decommissioned stage.

Loss of arable farmland compromising landscape-scale nature conservation projects

We note that the assessment of the loss of arable land will be covered in the ES and that very little assessment has been made at this stage (ref Chapter 12 Socio economics and Land Use).

We would like to request that the next stage of assessment also considers the loss of such a large extent of countryside landscape in relation to the impact this may have on allowing conservation minded-farmers and charities to deliver habitats for wildlife at a landscape scale. There has been a positive move in recent years (post the Making Space for Nature Lawton Report, 2010) to aim to deliver 'bigger, better and more joined up habitats'. In order to do this, land needs to be available to support such initiatives. The loss of such a significant area of productive farmland, which happens also to be in close proximity to several strategic landscape-scale nature conservation initiatives, has the potential to compromise efforts to deliver nature

conservation priorities elsewhere in East Cambridgeshire and West Suffolk, by making it harder to secure arable land for habitat creation in the best places.

Water Resources

Flood Risk

The majority of the land required for Sunnica East Site A has a low risk of flooding (less than a 1 in 1,000 chance of being flooded each year). There are some small areas at greater risk of flooding (1 in 100 to 1,000 annual probability) presents within Sunnica East Site A, associated with the Lee Brook within the western extent, and also north from the River Lark. The Sunnica East Site B is located on land with a low risk of flooding (less than a 1 in 1,000 chance of being flooded in any given year).

A range of mitigation measures, such as crossing of watercourses with trenchless techniques, removing infrastructure from Flood Zone 3b areas, and implementation of swales/drainage ditches, are embedded within the design of the scheme or captured within standard construction practices reflected in the CEMP so as to prevent or minimise effects on the water environment.

Overall, the councils agree with the assessment of flood risk; only Sunnica East A contains notable sources of fluvial risk from Lee Brook but construction works will be outside Flood Zone 3. Surface water flooding is very low across all site and we therefore agree with the findings of the report

Drainage Strategy

The use of open SuDS features to route runoff towards a basin is acceptable. All features are shallow, which is satisfactory and follows Environment Agency groundwater criteria and our local guidance on open SuDS.

The proposal to mimic natural drainage is a suitable approach, but it is difficult to evaluate as the topographic plans are difficult to use. No levels are provided, and resolution is poor. It would be better to convert contours into heat maps given the size of the plots. We need these plans to be able to follow logic behind the siting of swale and basin locations. We recommend the use of LiDAR if surveys have not already been undertaken. It would be helpful if the plans showing conveyance swales could include flow arrows.

Though we anticipate that infiltration is likely to be successful based on local knowledge of the site areas, no infiltration testing has yet occurred. At this stage, we would expect at least some intrusive investigations at each site to gain a better understanding of conditions. The critical factors are groundwater levels and how far below ground any chalk deposits are.

The section of chapter 9 concerned with Management of Construction Site Runoff does not appear to be based on the runoff dynamics of the site. It is also concerning that this section proposes "site drainage, including surface runoff and dewatering effluents, will be discharged to sewers". This is the opposite approach to the SuDS hierarchy; surface water should not be discharged to sewers. Instead, we would suggest that the best temporary drainage system would be temporary SuDS based

on an infiltration strategy with increased levels of pollution and sediment control (i.e. silt and oil traps).

In addition, this document should contain some assessment of the surface water drainage impacts of proposed access and haul roads through the site, both in terms of the quantity of run-off and the quality.

The decision to use piled foundations rather than concrete pads for solar panels is suitable from a drainage perspective. However, it is recommended that the risk of scouring and/or rutting caused by localised compaction during construction followed by intense rainfall being routed off panels is evaluated in order to consider whether any mitigation is necessary.

The promoter should also consider the possibility of conflict between drainage features and archaeology due to the shallow soils in the area.

It is not clear from the drainage strategy whether existing land drains are to be retained. They do not seem to be mapped in the PEIR documentation, so clarification would be welcome.

Finished floor levels should be raised 300mm above surrounding ground levels, or 600mm above the predicted river flood levels, whichever is highest.

Drainage Technical Note (FRA/Drainage Strategy Appendix F)

The Councils have the following specific comments to make on the technical note provided:

- A conservative infiltration rate has been selected – This is acceptable for this stage, however we do not agree with suggestions that ground investigation is cost prohibitive at this stage as groundwater levels information is important.
- 10% PIMP is an acceptable assumption for solar arrays but 50% for compound areas seems too low.
- FEH13 or observed rainfall should have been used given the scale of these sites and not FSR.
- 0.6m deep Suds features are satisfactory.
- Table 2 suggest 8% increase in impermeable due to the development – 45ha increase for eastern sites – This seems reasonable, but should be reflected in body of report at 4.1.
- Results in a conservative estimate of 53,400 m³ of storage required across all sites (88ha of imp area) – again seems reasonable.

Document Quality

Although the Councils generally agree with the recommendations of this chapter, there are a number of quality issues in the document which must be addressed in the Environmental Statement.

- In terms of drainage strategy, the PEIR does not match the findings and recommendations in the Flood Risk Assessment (FRA, Appendix 9A). The main chapter refers to attenuation features or detention basins throughout the document whereas the FRA uses infiltration as the basis for control. This is an

important distinction, as attenuation is unlikely to be acceptable to the Ministry of Defence due to the risk of bird strikes for military aviation caused by standing water.

- The drainage strategy assumes that 50% of the total area will be impermeable. If this relates to the compound and substation areas only, then it seems a little low, as it is presumed that there is little green space in these areas.
- At 4.1 it seems unlikely that the contributing area will not change post-consent, even if only due to the addition of the compound and substation areas. It would be useful to provide a map showing the contributing areas mentioned.
- The table with Greenfield runoff rates shows the Qbar rate being the highest. It may be that the return periods have been incorrectly inserted within the table, however, this should be accurate in future applications when determining the runoff rates.

Landscape and Visual Amenity

The characterisation of the baseline and the assessment of the adverse effects of the proposals, as well as the suggested mitigation/compensation are not appropriate or acceptable. Therefore, as it is currently presented, the proposed scheme is not acceptable in respect of landscape and visual amenity, and in this respect cannot be supported. However, the Councils consider that many of the methodological and baseline characterisation issues can be resolved, if the promoter is willing to engage effectively on these issues.

If a project of this scale must proceed, there will be substantial residual landscape character and visual impacts that just cannot be mitigated. A creative approach to design is required avoiding monotonous rows of panels. This could be through, for example, emulating field patterns or creating shapes and vistas that promote more visual interest. If the promoter was prepared to recognise the need for an exemplary approach to the design and mitigation, of what is currently the largest solar proposal in the UK, the Councils consider that there might be scope for considerably more of the landscape and visual amenity impacts to be mitigated.

Key Issues – relating to the overall scheme

Landscape character assessments and Landscape effects assessments

The boundaries are blurred between baseline findings and assessment. This applies to the PEIR and Appendices 10D and 10E. A clear distinction should be made between the baseline landscape character and the assessments of value, susceptibility, and sensitivity in relation to the proposals.

All levels of published landscape character assessments (as referenced in Appendix 10D) should inform the baseline studies within the Local Landscape Character Area (LLCA) Assessment (Appendix 10E). This assessment should describe how the LLCAs nest within the wider assessments, which elements and qualities of the landscape,

found locally, represent/ relate to the wider assessments and which are a-typical. If it is apparent that the boundaries of the LLCA do straddle the boundaries of wider areas/typologies, this should be explained and justified. Once a clear and coherent picture of the local landscape character is established, this can form the basis, together with the regional level character assessments for assessing the landscape effects.

The boundaries around the character areas defining the villages are far too tight. The settings of the villages and the features which define the boundaries of the villages are not adequately identified and described.

Whilst the principle of a detailed local landscape base is welcome, this should be developed and agreed in consultation with the relevant local authorities prior to its use in the Environmental Statement. This is essential if it is not to become an area of uncommon ground at a later date.

Action required –

1. Set out methodology, based on existing guidance (such as Natural England's, 'An Approach to Landscape Character Assessment', October 2014), for defining LLCAs and agree with LPA
2. Provide references to all levels of published Landscape Character Assessments and set out how the LLCAs are representative of or different from the wider character areas and provide justification where LLCAs do not nest within wider character areas and boundaries are re-defined
3. Base justifications for value, susceptibility and resulting sensitivity on sound methodology, that is agreed with LPAs (see LPA comments on Appendix 10C LVIA Methodology)
4. Restructure the assessment of the landscape effects to improve the communication of findings.
5. All aspects of landscape need to be assessed, not just physical elements.
6. Refine the presentation of figures (maps) so they visually aid the interpretation of the landscape character across the study area.

Design

The proposals have evolved (and continue to do so), and the red line has changed significantly. This means that some of the earlier comments made by the local authorities may have become obsolete. However, it also means that the following new concerns have arisen:

1. The proposed areas for PV panels are encroaching too close towards Isleham, and the proposals (including mitigation) do not respect the fenland edge character of this area.
2. The proposal is encroaching too close to the avenue leading to Chippenham Hall, affecting the setting of a registered park and garden.
3. Further landscape concerns are around the U6006 road, Worlington, West Row, La Hogue Road, the B1085 and the view from Newmarket (Limekilns), E18 and E33
4. Despite the significant changes to the red line, Sunnica West A would be a vast expanse of uninterrupted solar plant.

5. All boundary changes should be reviewed as they could result in additional effects on receptors, for example at Biggin Farm (close to Grade II Listed Fordham House) and at Chippenham Fen (additional encroachment on avenue).

Action Required – In order to minimise and eliminate adverse landscape impacts from the revised layout of the scheme, a creative and iterative approach to the design of the solar farm and landscape mitigation is necessary to resolve these issues.

Mitigation

The mitigation proposals across the scheme are too homogenous and, in some areas, inappropriate to the extent that the adverse effect of the proposed mitigation planting is potentially greater than the adverse effects of the solar plant proposals. (Isleham / La Hogue Road/ Golf Links Road/ B1085 view out of Chippenham and possibly other locations).

Further details are required about specific mitigation planting that is suitable for the different identified landscape character areas. Planting proposals should be based on the landscape character and observed existing vegetation.

Action Required – an effective and locally appropriate scheme of mitigation reflecting the local characteristics of the different areas in which the project is built is essential if the project is to be made acceptable – Detailed discussions with the LPAs is essential if these issues are to be resolved.

Public Rights of Way

There are concerns about the visual impact on PROWs. This includes the various different users of the network, with viewpoints not being covered for equestrian use as previously agreed.

The closure of all Rights of Way within the red line boundary for the duration of the construction phase seems excessive and needs to be reconsidered. There is concern that Worlington and Freckenham will effectively be cut off from recreational routes in the area during the construction phase. A phased approach should be adopted, and routes should only be closed for a minimum period, when works require it. Alternative routes should be provided. There are areas of the network that should remain open at all times due to routes being around the edge of the scheme area and not physically affected by works.

The closure of routes could potentially have a negative impact on other recreational areas in the wider area, including areas designated for their ecological value. These impacts will need to be assessed in the report and in the Habitat Regulation Assessment.

The public access has not sufficiently increased. The suggestions from the Rights of Way Officer for desired additional routes were not taken further; some of the

proposed additional permissive routes may interfere with ecological aims, for example in stone curlew areas.

There are concerns over noise from inverters, switchgear and other associated equipment disturbing equestrian users, for example on Bridleway 204/5. Such equipment needs to be located a sufficient distance away from PROW.

Because permissive paths either cross or are bordered by the proposed DCO area, it is recommended that the works promoter seeks clarification from the Cambridgeshire Asset Information service as to the lateral width of PROW and highways in the affected area. This will help to ensure that any works proposed or undertaken within the DCO area do not encroach upon the PROW or have a negative impact on the users of the network.

LVIA Methodology

The methodology for the assessment of landscape and visual effects of the scheme is fundamentally flawed and therefore leads to conclusions that the Councils cannot agree with. This needs to be addressed. It would have been preferable to do this prior to the PEIR, but the Councils are happy to give further detail as to what changes to the methodology are necessary (see also below).

Action required - methodology should be agreed prior to preparation of Environmental Statement to avoid uncommon ground in this area.

Visual presentation

The viewpoints have not been updated to reflect changes to the DCO red line and the scheme design that has occurred. A number of viewpoints which previously were representative are now redundant as they no longer focus on the application site, while other viewpoints that would focus on the most intrusive parts of the development are missing or focused away from these features.

The viewing angles of some of the photographs go much beyond the human field of vision, resulting in a fish-bowl effect for some views. This also leads to the proposed development appearing smaller within the photograph.

Some important views (photomontages) are presented across two pages, with the result that the important and central elements of the views, the solar installations, are effectively pushed to the edge and/or split in half. This makes it harder to read the photomontages and to understand the effects of the proposals in the landscape.

The photomontages do not appear to have location maps. The remaining viewpoints have small location maps that are difficult to read, especially as all viewpoints in the area have been left in and it is near impossible to identify which viewpoint relates to the photograph. The relevant viewpoint should be highlighted on the location map for clarity.

For each viewpoint three photographs are included in the figures, a summer and a winter panorama and a more focused view. However there does not appear to be any explanation as to why this is the case, and it is not clear whether the assessment is undertaken in the context of the panorama or the more focused area. The photographs have hardly any annotations, and the focused view has none; description and assessment have to be found in the appropriate appendix, which is cumbersome. The focused views are unusual, but could provide additional insight and be very useful, if they were annotated so the location, extent and context of the proposals are clear.

Information clarifying how/at what size the photographs should be viewed is missing, and the photomontages are to be viewed at A1 size and at a comfortable arm's length according to the note. Given that this statutory consultation is taking place exclusively online and that officers, Councillors and many members of the public are likely to continue using the online material, the visual representation should be made much more user friendly.

It would be useful to add to Year 15 visualisations a succinct comment of when this level of mitigation can be expected to be reached. For some mitigation planting (e.g. reed beds or hedges) this could be much earlier than in Year 15.

Action required - Reassess and agree the baseline methodology and the viewpoints in light of changes already made to the DCO site and scheme design and any future changes prior to preparation of Environmental Statement to avoid uncommon ground in this area.

Inter- and Intra-Cumulative effects

The assessment addresses the potential interaction of effects (chapter 17) caused by the scheme and has also identified other developments in the area that may lead to cumulative effects (section 10.11). It has, however, not sufficiently addressed and reported on the potential intra-cumulative effects.

The proposal now effectively consists of four sites, plus interlinking cable routes. Therefore, the most relevant results from both the landscape character and visual assessments are those described in the PEIR as the 'combined' effects. However, these assessments are lost in the volume of information presented, although it is noted that these assessments are used in chapter 16. However, in chapter 16 effects on landscape character and visual environment should be differentiated and the view reference used.

It is not sufficient to state that from no visual receptor can the entire development be viewed and bury the findings within the appendices that assess landscape and visual effects and not summarise them in the main report.

It is further necessary that the sequential aspects of moving through the area are thoroughly assessed for all users, and that it is fully understood how the perception, that users have of the landscape within and around Sunnica, is affected by the proposals.

Action required – methodology for dealing with intra and inter cumulative effects of the project should be agreed prior to preparation of Environmental Statement to avoid uncommon ground in this area.

Glint and Glare

There is concern as to the impact of glint and glare, noting proposals to use planting to mitigate the impact will take a number of years to establish.

There is concern regarding glint and glare for equestrian users south of Sunnica West site A. Proposals should investigate methods to mitigate these impacts in the years before the planting is established.

Receptor heights have not been covered fully for equestrian use for the public rights of way network, with a number of routes not assessed at the increased height detailed in the assessment.

Action required – Review the issues associated with glint and glare for equestrian receptors.

Other concerns

It is concerning that many suggestions and recommendations previously made by the Councils do not seem to have been taken on board, for example:

- No reference can be found in the PEIR for assessment of views for equestrian users as visual receptors (separate from glint and glare).
- The proposed permissive paths are not what was asked for.
- Some additional viewpoints are still missing (most importantly along the avenue towards the entrance of Chippenham Hall, but also from B1085 looking south-east into the Sunnica West A (slightly north-east of viewpoint 32).
- The directionality of viewpoints on maps is still inaccurate in places and double arrows are unhelpful.
- The impact of lighting has not been sufficiently considered in the landscape section.

Comments in more detail

More detailed comments with regard to these key issues as well as additional comments on Chapter 10 of the PEIR are detailed below. Given the fact that the design is still evolving and the Councils are seeking fundamental changes to the methodology, assessment and mitigation, the Councils reserve the right to raise additional matters of detail beyond the statutory consultation period.

The Councils are happy to collaborate in updating the approach to the LVIA between now and the submission of the DCO application.

Within West Suffolk, the assessment concluded that the proposals would have a significant effect on the landscape character of the Sunnica East site A and B and on the local landscape character for Sunnica East site B, and that the effects would persist in the long term and at decommissioning. Visual effects would be significant during the construction phase; however, these would be short to medium term and

would be reduced as the landscape planting matures. In the long term there would continue to be significant visual effects which would be experienced by recreational users and users of the training ground at the Limekilns located on the northern side of Newmarket.

Within East Cambridgeshire the assessment concluded that the proposals will have a significant effect on the landscape character of the Sunnica East site A, as well as Sunnica West sites A and B, and that the effects would persist in the long term and at decommissioning. Visual effects would be significant during the construction phase for all three sites; by Year 1 these would be reduced for Sunnica East site B, and by Year 15 also for Sunnica East B, as the mitigation planting matures. In the long term there would continue to be significant visual effects for Sunnica West site A.

PEIR Assessment assumptions

Groundworks: An assumption within the PEIR is that localised ground levelling will be required. It is not clear what the scope of this would be, for example would the ground levels be manipulated by +/- 0.5m such that they would be imperceptible, or would changes in ground levels be more significant and therefore have an additional impact on landscape character and visual amenity. The assumptions include that the excavated material from the cable route and other excavation will be stored within the DCO site. However, it is not clear where this will be stored, and how it will be accommodated both in the short term and during operation. This has the potential to contribute to the landscape effects of the proposal.

Ground preparation: There does not appear to be any provision for de-compacting the soil after use of heavy machinery during construction and prior to mitigative seeding/planting (10.3.7).

Perimeter fence: An assumption is that the perimeter fence will be a 2m high deer proof fence constructed early in the construction period to help protect retained vegetation. Chapter 3 suggests that this could be up to 2.5m in height. Whilst the early construction of the perimeter fence is welcomed, it is not clear what the design (noting that plate 3-11 is a typical example of a deer fence) or alignment of the perimeter fencing will be. These factors will contribute to the landscape character and visual effects – the fence itself has the potential to have a significant effect on its own if not aligned carefully in relation to existing landscape features. More detail is required. It appears that the BESS, substations and other infrastructure such as the solar stations would require more substantial security fencing and it is not clear whether this has been taken into account.

Appendix 10B High Level Tree Constraints Report

The PEIR and design of the proposals to date relies on a High-level tree constraints report, **Appendix 10B**. The methodology used relies on approximate tree height and canopy spread information taken from the National Tree Map (NTM) data set and a walk-over assessment for accessible areas. The data has been used to derive underground and above ground constraint buffers for trees and to identify trees likely to be of higher value. Whilst it is agreed that this high-level assessment may be suitable for this early-stage design and planning purposes, focusing on the likely quality and benefits of the trees, there are likely to be gaps that will come to light at

later stages. The PEIR confirms that further survey is required, and this should be undertaken to inform the ES and the DCO application.

The mitigation hierarchy must be applied to trees and hedges. The LPAs expect that the proposals will be reviewed, and tree losses avoided and minimised, for example along cable route A, between Sunnica East Site B and Sunnica West Site A at Heath Plantation; here the cable route is still shown to cut through a woodland, which the High-Level Tree Constraints Plan identifies as a group likely to be of high Value (Sheet 14). The alignment of the cable route corridor should be amended so that it avoids the woodland entirely.

It is essential that a suitably qualified arboriculturist is appointed as soon as possible to advise on tree matters at the detailed design stage, to supervise any tree works throughout the construction of the scheme (including installation of tree protection fencing, tree work, construction within close proximity to trees) and to produce a post completion inspection report detailing the condition of all trees that may have been affected by the works carried out.

PEIR Assessment methodology

Study Area

The study area should continue to be reviewed by the promoter if the parameters of the scheme change including the footprint and the height of the structures.

A large area of the original site area of Sunnica East around Freckenham has been removed from the scheme; instead, the scheme now comes much closer to Isleham. Sunnica East is now split into A and B. While this brings much needed relief in the area between Worlington and Freckenham, the location of solar panels in close proximity to Isleham may not be appropriate. Although this area is still within Rolling Estate Chalklands, the landscape here is beginning to change and transition into the settled fenland character type, being quite flat with wide open views.

Methodology

The methodology for the LVIA is derived from the Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3), 2013 and the photomontage methodology is derived from the Landscape Institute's TGN 06/19: Visual Representation of Development Proposals, 2019 which are considered to be the industry standard. The methodology is set out in **Appendix 10C** (see below). Reference is also made to the glint and glare assessment **Appendix 16A** (see below).

The scheme design has evolved and the viewpoints that have been chosen will need to be adjusted to ensure that the visual effects of the more intrusive infrastructure elements such as access points, BESS, substations and security fencing are also assessed.

Residential Visual Amenity Assessment has not been considered necessary (section 10.4.24 -28). However, in light of the concerns about the methodology this should remain a matter for review.

The potential effect of lighting during construction, operation, and decommissioning of the proposals does not appear to have been considered. The need for lighting is

detailed on page 8-70 of the PEIR, however, it doesn't appear to have been considered in the landscape section. West Suffolk planning policy JDMPD DM13 requires that development should protect and enhance the nocturnal character of the landscape.

Appendix 10C LVIA Methodology, August 2020

Table 1-2: Landscape susceptibility, p.2

- The susceptibility criteria are ill defined and generic rather than specific.
- All assessments should be carried out against the current proposals as they stand (bearing in mind the Rochdale Envelope).
- The 'likelihood of undue consequences' is not a criterion for susceptibility. It is the susceptibility of a particular site to the changes resulting from a specific scheme that determines the likelihood of undue consequences.
- In order to establish the susceptibility of a specific area of a specific landscape to change caused by a specific development the criteria need to be landscape based and should include aspects like landform, location (valley - valley-side - plateau), characteristic vegetation, local landscape character, tranquillity. GLVIA 3rd states on pp.88f. that susceptibility "means the ability of the landscape (whether it be the overall character or quality/condition of a particular landscape type or area, or an individual element and/or feature, or a particular aesthetic and perceptual aspect) to accommodate the proposed development without undue consequences for the maintenance of the baseline situation and/or the achievement of planning policies and strategies."

Table 1-3: Landscape Sensitivity, p. 2

- The criteria to discern 'medium' and 'low' sensitivity seem to be too similar and we suggest losing the 'very low' category and use its criteria for the 'low sensitivity' category. Otherwise, there is a danger that landscapes of community and local value may slide too easily into the 'very low sensitivity' category.
- Looking at the provided tables more holistically, we cannot see much difference between Landscape Sensitivity and Landscape Value. There are no categories for landscapes/ sites that have limited or very low value, because they are degraded, yet have little capacity for further adverse change, but could benefit from improvement. Nor does there appear to be a category for highly valued landscapes of national importance that may be able to accommodate a certain degree of change, because of factors in the landscape.
- There is concern that the methodology is calibrated in a way that may put more of the expected effects into the non-significant bracket. This could be mitigated by the professional judgement in the narrative. However, this cannot be verified for Viewpoint 33, north-west of La Hogue Road, at the junction with La Hogue Farm. It is difficult to follow the judgement that the change of view by year 15 from wide open landscape to looking up close onto the edge of a tree belt as far as the eye can see can result in a negligible effect.
- There is a need to question statements such as:
10.6.201 The susceptibility of the LLCA mainly ranges between low to high. The low susceptibility is due to many developed areas or fields without landscape features such that development could be accommodated. The high

susceptibility is due to Conservation Areas, or defined 'stud' landscapes, with limited ability to accommodate change. (PEIR, p.10-55)

In particular around Isleham, but also south-west of La Hogue Road, wide open spaces with few features are part of the character and highly susceptible to change.

Appendix 16A Glint and Glare Assessment

The mitigation embedded in the proposals has been accounted for in assessing glint and glare; this could be problematic, as the mitigation philosophy and resulting mitigation measures have not been agreed with the LPAs and are subject to change. In addition, the mitigation will take some time to establish and become effective. Re-assessment may be required once mitigation planting is finalised and agreed.

- Paragraph 16.3.29 mentions native and non-native evergreen species to be planted next to the temporary hoarding; clarification is required which species are proposed here, particularly which- non-native species.

There is also concern over the impact on equestrian use on the PRoW and impact on viewpoint 40 with regard to early morning impacts when this route receives high use.

- All PRoW that have equestrian access, as shown in Section 5.4, should be assessed at a height of 3.5 metres of horse and rider to reflect the equestrian receptor.
- The geometric calculation results do not give a true interpretation of the impact for the Public Right of Way network as detailed in 8.8 of the assessment.

PEIR Stakeholder engagement

Consultation with ECDC, CCC, WSC and SCC Landscape Officers and other consultees has been undertaken to discuss some technical issues ahead of the PEIR. However, many details of the scheme including the parameter plans, and the DCO outline were evolving at that time. As a result, those early comments may not now be relevant to the design currently being assessed and similarly comments made in relation to the PEIR are focused on the current scheme which may be different to the final scheme submitted.

PEIR Baseline conditions

The GLVIA 3 is clear (section 5.41-5.42) that sensitivity of a landscape may be based on a published 'intrinsic' sensitivity study (such as those in the landscape character assessments) but should be an assessment of the susceptibility of the receptors in relation to change arising from the specific development proposals. The GLVIA 3 advises that the assessment of sensibility should not be recorded as part of the landscape baseline. The methodology used does not appear to have followed this principle.

The PEIR does not take into account that West Suffolk policy DM13 identifies the Brecks as a valued landscape which has "by reason of their landform, historic

landscape importance and/or condition, a very limited capacity to absorb change without a significant material effect on their character and/or condition." The evidence documents behind this are the Norfolk and Suffolk Brecks Landscape Character Assessment and the Brecks special qualities study which Officers have already made the consultants aware of.

Appendix 10D Local (Published) landscape character assessment

The Sunnica development is located across three national landscape character areas, as clearly shown in figure 10-5 illustrating the National Character Areas. The various regional and county character assessments reflect these, each refining the boundaries, and describing landscape character types/typologies in more detail. Unfortunately, this is not demonstrated in the presentation and organisation of the baseline information. The mapping could better illustrate the compatibility of the landscape assessments at the different levels if the colours used were more carefully selected.

- The boundaries between baseline studies and proposal assessment are not sufficiently defined. The sensitivity of the landscape to this project is not a part of the baseline but forms part of the assessment.
- The assessments and judgements of value and susceptibility are not adequately evidenced and explained.
- Perceptual, aesthetic, cultural and social aspects of landscape do not appear to be considered; the focus is on physical features, which is important, but not sufficient.

Appendix 10E Local landscape character areas

The fine-grain approach to local character areas is welcomed as a baseline for assessment. Paragraph 1.1.1 states that the LLCAs have been identified via fieldwork. The methodology for this field work, based on existing guidance (such as Natural England's, 'An Approach to Landscape Character Assessment', October 2014), for defining LLCAs should be clearly set out, i.e., which criteria were used to subdivide and, in some cases redefine the boundaries of the landscape types and areas of the published Landscape Character Assessments.

It is expected that the Local Landscape Character Areas would be based on ("nest in") and developed from all available layers of published Landscape Character Assessments (see Appendix 10D). In Appendix 10E reference is made only to the National Landscape Character Areas, which is not comprehensive enough. As the grain of assessment gets finer on the local assessment level, it is important to further refine and adjust the assessments of coarser grain assessments, where available, and to analyse where the local character is congruent and where it is different from the wider landscape character. These likenesses and differences need to be presented with more than a one-or-two-word reference to key characteristics of the respective National Character Area. More evidence and justification are required to answer the following:

- How far are the key characteristics identified in other Landscape Character Assessments present in the local area?

- How is the local area similar or different from the wider landscape area?
- To what extent is the local character area representative of the various character areas/typologies in which it sits (define: representative – somewhat representative – less representative – not representative; should there be other categories?)?

The paragraphs relating to value, susceptibility and sensitivity should not form part of the baseline, as they are part of the assessment. The justifications for Landscape Value, Landscape Susceptibility and Landscape Sensitivity

- are too formulaic,
- are based on a methodology which the LPAs consider to be fundamentally flawed,
- need to be more descriptive and detailed (for example a description should be included of the potential changes in the local area resulting from the proposals, and the ability of the landscape to accommodate these changes (susceptibility)).

There are concerns about the boundaries of some of the LLCAs, particularly around settlements, and where they cut across landscape typologies defined in other higher-level studies.

The colours representing the Local Landscape Character Areas appear to have been chosen mainly for ease of *telling apart*; for this transitional landscape it may be more useful if the colours were also to illustrate this transitional character and, if possible, use colours akin to those of the wider area assessments. This would then provide an additional visual layer of information to the text, and unusual pockets of character different from the wider areas could be more easily recognised.

The paragraphs relating to susceptibility do not adequately analyse how the proposed development (or the elements of the development present within this area) would affect certain elements of the landscape. For example, the area around Isleham, which is named: East Fen Farmland (LLCA 11): no explanation is given as to what effect the proposals have on the baseline of particular aesthetic and perceptual qualities of this area; it only briefly refers to landscape features: *"1.1.51 The LLCA is an open, very gently undulating arable landscape with limited vegetation cover, such that the extent of features with the potential to be impacted is low. the LLCA is therefore assessed as being of low susceptibility to the type of development proposed"*.

Appendix 10F Visual baseline

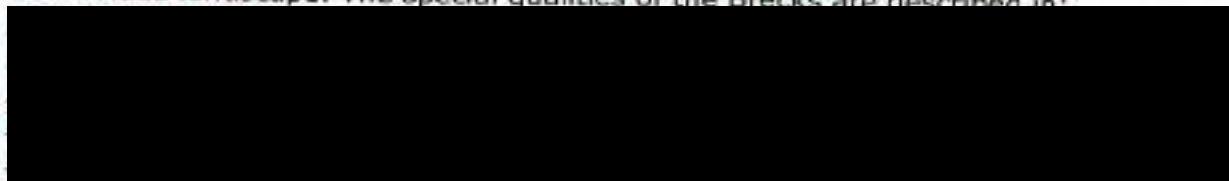
Visual baseline methodology

The information included in the visual baseline appendix goes beyond baseline description to include assessment, and the boundaries between baseline studies and assessment are blurred. Sentences such as 'no part of the scheme is visible' are considered to be part of the assessment, as would the assessment of susceptibility, value and sensitivity. Whilst it might be convenient to group this information together with the baseline description, the status of this information should be clear through appropriate labelling.

The descriptions of the existing views skip to the detail of the views without properly setting the scene; for example, neglecting to note if it is a *rural view of open countryside*. The descriptions only extend as far as they can be related to the proposals, often from the first sentence. They do not explain which qualities of the landscape, if any, contribute to the view. The GLVIA suggests that the nature, composition and characteristics of the existing view are described and goes on to give examples of visual characteristics as the nature and extent of the skyline, aspects of visual scale and proportion, especially with respect to any particular horizontal or vertical emphasis, and any key foci.

The methodology for assessing sensitivity is flawed – see above. In addition, the assessment is not consistent throughout the viewpoints.

When valuing viewpoints consideration should be given to the features of the Brecks as a valued landscape. The special qualities of the Brecks are described in:



Viewpoints

The viewpoints have not been updated to reflect changes to the DCO red line and the scheme design that has occurred. A number of viewpoints which previously were representative are now redundant as they no longer focus on the application site, while other viewpoints that would focus on the most intrusive parts of the development, for example the BESS and other infrastructure at E18, E33 and (insert re camb) are missing, or focused away from these features.

- An additional viewpoint is required from Devil's Dyke.
- An additional viewpoint is required from the avenue leading from the original main entrance to Chippenham estate looking in all directions, from a suitable location, where the extent of the PV panels on either side of the avenue and the resulting effects on the setting are evident. This should be a Type 4 visualisation (photomontage).
- An additional viewpoint is required from B1085 looking south-east into the Sunnica West A.
- An additional viewpoint is required for the proposed redline change at Biggin Farm A142. Fordham House is a Grade II Listed Building and will need to be assessed as a visual receptor. Any potential effects on the setting of Fordham House will also need to be assessed (Cultural Heritage).
- View to E33 from the road to West Row.

There is still concern that the location and field of view of viewpoints is not precise on the plan and the direction of view is not always consistent with the photographs. The use of double arrows instead of a fan indicating the visual field is not useful. The PINs scoping opinion drew attention to this matter in the scoping opinion (4.5.13).

For example: Viewpoint 9, shown on the plan to be looking north-west, while the photo does appear to be looking north; in addition, the caption on the photo page

refers to trees visible along the B1102, which is impossible as the B1102 is situated south of the viewpoint. The trees may be located along Beck Road.

The title of the viewpoint should include the viewing direction.

The provision of photomontages does not appear to be sufficient, particularly for Sunnica West and around Burwell substation. It is suggested that Viewpoints 41, 46 and 54/55 are reconsidered.

Comments on the visual presentation are included above.

PEIR Embedded Design mitigation

- The assessment of the effects of the various infrastructure elements, for example the BESS relies on tonal rendering of the infrastructure elements to reduce their visual effects. Landscape colour is likely to vary along with the main landscape character areas. There is no evidence that a colour study has been undertaken. This should form part of the design code for these built features.
- The embedded landscape mitigation in 10.7.5 in general lacks detail. There are no minimum offsets and the minimum width of tree belts is not detailed. A tree belt of 5m in width will perform differently from one of 15m or 30m wide.
- The landscape proposals should respond to the landscape character typology.
- The mitigation does not always appear appropriate for the local landscape character/type, in some cases, to the extent that the mitigation planting itself has a greater adverse effect than the development proposals.

PEIR Assessment of likely impacts and effects

This section of the report is the assessment of likely significant effects of the scheme. Effects on both landscape character (**Appendix 10G**) and visual amenity (views) (**Appendix 10H**) are covered.

The effects of the individual elements of the project areas are assessed individually and of the project as a whole, for example where there are two site areas within a character area, or a view is of more than one component part.

- The description of the construction activity across the landscape is underplayed. The presence of the construction materials within the landscape is not included, nor the presence of the workforce and the vehicle movements that would be required across the project areas and on the network. The assessment states that *individually the construction equipment and excavation within the fields would not be uncharacteristic within an agricultural landscape* – this is not entirely true as many of the vehicles and machinery that will be present are not generally associated with farming and the increased activity in the rural area would be widespread across a large area of farmland leaving a visible footprint.

- The assessment of construction effects on the published landscape character assessments relies on the fact that the effects are focused on only a small part of each of the landscape character areas. Whilst the GLVIA allows for the geographical extent of the effects to be part of the consideration, in this assessment, significant weight is given to the fact that the effects would only be on small and localised in relation to the wider extent of the published landscape character area.
- The quarry close to Rectory farm is not perceptible in the landscape because of mature tree belts and the farm is typical of its rural location. The BESS, substation and compound at E18 is likely to have a significant visual effect and this is not picked up in the assessment and additional viewpoints are required.
- Golf links road, which is a quiet country lane between Worlington and Barton Mills, is used by pedestrians for recreation as well as motorists. The sensitivity of receptors should reflect this.
- The effects of the elements of the project areas are assessed individually and then the interconnectivity of the project as a whole, for example where there are two site areas within a character area, or a view is of more than one component part.

Cumulative effects are those that result from additional changes to the landscape or visual amenity caused by the proposed development in conjunction with other developments (associated with or separate from it). The study does not consider whether the total effect of the individual development parcels is greater than the sum of the parts. The study should consider whether the cumulative landscape effects would change the landscape character of the area to the extent that it becomes a significantly different character type. This might be the case if the proposals are likely to change aesthetic and perceptual qualities of the landscape such as scale, pattern and colour, sense of naturalness, remoteness and tranquillity which would lead to modification of key characteristics (GLVIA 7.28).

Whilst combined visual effects may have been considered, sequential visual effects are potentially more relevant in this case. The concern is that residents in some settlements, for example Worlington, would have a series of sequential views when travelling to or from their home by either car or when walking for recreation. The geographical extent of this development suggests that a more thorough assessment of the combined effects of the development areas is required.

Landscape officers requested that a narrative on the overall effects of the proposals on each village and identifying within each village how the effects might vary. The promoter has responded (PEIR page 10-30) "A local landscape character assessment has been undertaken to assess the likely impacts and effects on the villages. This has been undertaken by a local landscape character assessment of the villages and identifying their sensitivity to the Scheme".

This appears to refer to Appendix 10E Local Landscape Character Areas (see comments above), which falls short in describing the potential effects for each village in a meaningful way. The settings of the villages and the features which define the boundaries of the village were not identified and described. The sensitivity analysis

and the further assessment of landscape and visual effects do not provide the narrative requested.

Appendix 10G Landscape effects

The organisation of information in Appendix 10G Landscape effects, whilst it has a logic, provides an assessment that is over-complicated and fragmented, to the extent that it risks becoming unintelligible.

In assessing the impact of the proposed development separately for each published and local landscape character assessment, the PEIR (and the associated appendix 10G) present a fragmented picture of the impacts of the proposal on landscape character, based on the scale of the assessment used rather than on the important and valued components of the landscape in and around the study area.

Five levels of landscape character areas and types (in total around 60 areas) are assessed separately against each individual site or cable route section and at each phase (construction, year 1, year 15, decommissioning) of the scheme. It may be more effective to assess the individual sites and cable route sections and assess which landscape character areas they would affect and how, over time. Intra-project effects could then be assessed at the end.

West Suffolk planning policy requires that landscape effects resulting from a scheme are based on the county landscape types and the local landscape character. East Cambridgeshire expects that the East Cambridgeshire Landscape Guidelines (1991) form the basis for detailed local character assessments. As the Sunnica proposal straddles two counties it is considered most appropriate for the assessment of landscape effects to be focused on the regional and local levels.

The assessment is selective about the elements of the various landscape character areas/types that would be undermined by the development. In particular the significant effect on agricultural land through the change in land-use and land-cover is underplayed, and the effects dismissed because it would be reversible and/or would only occupy a small part of any one large landscape character area. A more consistent and systematic approach should be taken, based on the characteristic elements of the landscape highlighted in the assessment of baseline conditions including perceptual, aesthetic, cultural and social aspects of landscape as well as physical features.

Year 15 assessments should be compared to the baseline situation as well as the year 1 situation.

Consideration should also be given to whether the proposed scheme would have any impact on landscape character across the different landscape character areas/typologies, for example associated with the change of land-cover across such a diverse area.

Appendix 10H Visual effects

The assessment of visual effects does not fully explore the impact of the proposals. Whilst a general description of the elements of the development is given, the

description does not go far enough in providing detail on size and scale, geographical extent and duration of effects.

The year 15 situation should be assessed both against the year 1 situation but also against the baseline to ensure that changes are fully considered, particularly where an open view is to be lost.

The viewpoints for Public Rights of Way and the U6006 have been set at 1.6 metres for pedestrian view. A higher equestrian view has not been provided as previously requested. This does not give a true interpretation of visual effects for all recreational users.

PEIR Additional mitigation measures and enhancement measures

There were no additional landscape and enhancement measures identified (10.9 of the PEIR). Officers disagree that further mitigation measures are not practicable and are of the opinion that innovative design could find solutions to at least some of the effects identified.

It is noted that retention of existing landscape features will be implemented through the CEMP and this is welcomed, as is monitoring of the establishment of the landscape through the OLEMP (**Appendix 10I**).

There may be a requirement for assessment of the landscape effectiveness at a future point to see if the proposed measures are effective or whether additional planting is required.

Appendix 10I - Outline Landscape and Ecology Management Plan

The content of the OLEMP should closely reflect that set out in the British Standard BS42020-2013 Biodiversity – Code of practice for planning and development. In this draft document a disproportionate part of this document deals with a description of the site and existing features. This would be more useful if it were accompanied by detailed plans.

The OLEMP sets aside only 5 pages to detail the management of the DCO site which is insufficient given the complexity and size of the site. The management detail should be site specific, cover both the short and long term and must reflect the nuances of the different parts of the site. BS42020:2013 requires the following detail which will be expected with the DCO OLEMP:

- Aims and objectives of management.
- Appropriate management options for achieving aims and objectives.
- Prescriptions for management actions.
- Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period).
- The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme.

If the Vision is for 'The Scheme', it should reference the main purpose which is to provide energy. The network of environmental features is largely existing, and the vision should include for the retention and enhancement of these along with new features that are required/proposed. Together these will form the framework in which the development will sit. However, a key component in the success of the GI will be appropriate management in the short and long term and this should be part of the vision. If the intention is for the GI to reflect the surrounding landscape character and context, this should also be part of the vision.

It is noted that existing woodland, treelines, and hedgerows are to be retained and additional woodland and hedgerows are to be planted. However, it is not clear where hedgerow losses will occur, these need to be defined and quantified. Concern is that significant hedgerow removal will be required to provide visibility splays at access points, and that this will have significant habitat and visual consequences, which will need to be mitigated (for example with hedges along the returns into the site).

Further, the proposals for woodland and hedgerow planting are not clear. The scale of the parameter plans, at 1:18000, does not provide an acceptable level of location detail. The details provided of landscape planting presented in the OLEMP, including tree species and sizes trees, hedgerow planting and replacement are too generic, and therefore not acceptable in their current form. Landscape proposals including tree planting, and new grassland creation should be tailored to the location and conditions, noting that these change across the DCO site. Specific management prescriptions will be required. Both landscape proposals and management prescriptions should be detailed.

Where hedges are being retained and relied on for mitigation of landscape effects, the condition of the hedgerow needs to be established and management prescriptions should be made clear.

5m buffers around panel fields – please confirm that these will not be used for access. In previous iterations this offset was applied to features on internal boundaries with no visibility. Along external boundaries with roads, settlements, and PRoW a buffer/offset of more than 20m was proposed and this strategy should be retained.

It is essential that a suitably qualified arboriculturist is appointed as soon as possible to advise on tree matters at the detailed design stage, to supervise any tree works throughout the construction of the scheme (including to sign off tree protection fencing, tree work, construction within close proximity to trees) and to produce a post completion inspection report detailing the condition of all trees that may have been affected by the works carried out.

Noise and Vibration

11.2.9 of the report states "The DCO application will include a statement of statutory nuisance." It is unclear what such as a statement will address.

Section 158 of the Planning Act 2008 advises that in developments of this size the statutory authority for carrying out a development provides a defence in any civil or

criminal proceedings for nuisance under Part III of the Environmental Protection Act 1990 i.e. the nuisance was the inevitable consequence of what has been authorised. This is termed the statutory authority defence but only applies to actions that are a nuisance and not those determined to be prejudicial to health.

Although statutory noise nuisance does not provide for a maximum level of noise to be attained, the spirit of the legislation is the prevention of an unreasonable and substantial interference to a person's quality of life. This is the threshold at which a nuisance is assessed. Although EN1 advises it is very important that, at the application stage of an energy NSIP, possible sources of nuisance under section 79(1) of the 1990 Act and how they may be mitigated or limited are considered so that appropriate requirements can be included in any subsequent order granting development consent, it is the PH&H view that the DCO application needs to address adverse amenity impacts and satisfy the aims of the Noise Policy Statement for England in that the development will mitigate and minimise adverse impacts on the quality of life, and not only be required to demonstrate the prevention of an unreasonable and substantial interference from noise and other nuisances.

Therefore, if the DCO application includes a statement advising that a statutory noise nuisance will not be caused from this development then this is not considered to go far enough.

That said the report does go on to categorise amenity impacts using the recognised concepts of LOAEL and SOAEL against which the sensitivity of receptors is compared.

11.4.11 of the report correctly references E.3.2 of BS5228-1 to identify noise threshold levels during construction. However, the report has not correctly addressed the variation between threshold daytime noise levels and the threshold levels at weekends, namely Saturdays after 1300 hours. Although the calculated range of predicted construction noise at all the receptors is calculated to be below a threshold level of 65dB(A) some are above the weekend threshold value of 55dB(A). Taking into account this issue the levels categorised as appropriate for describing a LOAEL and a SOAEL must be revisited as it is not a single threshold level of the noise that is to be considered but also the day of the week that construction is occurring and when elevated noise levels may occur.

Further explanation to expand on the details in 11.8.5 are required. Does the maximum period of 1 month for high construction noise levels at any of the receptors relate to levels below 65dB(A)?

Agree with the determination of LOAEL and SOAEL levels for vibration impacts in 11.4.13 but cannot comment on the acceptability or otherwise of the guideline values for cosmetic damage to buildings. The information provided with respect to human responses to vibration from 11.8.7 onwards and the determination of negligible or minor adverse impacts is accepted. However, the human response to vibration is very sensitive, even at low levels. Concerns are often raised about breaches of acceptable standards and damage to property, so it is recommended that as part of the noise monitoring procedures to be adopted within the detailed CEMPs and any S 61 applications, that vibration monitors are also installed at key sites during specific periods, to enable reassurance to be provided to residents and the LA that guideline limits are being met.

Baseline Noise Survey – It is noted that for the long-term monitoring survey several of the sites chosen were immediately adjacent to roads. Practical considerations may have required this, but would expect ambient and background noise levels at domestic properties in many of the villages, particularly those sited away from roadsides or screened by buildings, to be lower. The development sites are positioned in isolated fields often some distance from roads, with construction plant and operational plant potentially having a line of sight to rural dwellings with no intervening existing noise sources, particularly at night. It is noted that L90 levels at 6 of the long-term monitoring sites is measured to be 40 dB(A) or higher at night, with only 5 sites showing a L90 of below 40 dB(A). The lowest measured ambient level during the daytime is 49dB(A), with the highest 4 ambient levels being shown at roadside monitoring positions. That said it is noted that the predicted construction and traffic noise assessments calculate the noise to be sufficiently below the reported ambient levels to allow for some uncertainty whilst still demonstrating a negligible impact. It will be important when developing the detailed CEMP(s) to have regard to the rural nature of many of the dwellings in this area which are not adjacent to roads leading into or out of villages (therefore experiencing lower ambient levels) and to fully consider the adequate protection of their external amenity areas during construction phases.

Operational Noise Monitoring -

- a) Clarification required of the figures being quoted for sound power levels of the substations (sound power levels referenced may be sound pressure levels). Clarification is required on the difference in sound power of the transformers proposed on East A, West A and East B compared to that of the proposed extension to the existing Burwell Substation.
- b) Information as to worst case noise levels should be provided. The data appears to be suggesting that the sound power of the transformers increases from 90 dB(A) to 92 dB(A) with +50% load. Rational of accepting this as representative and information as to the sound power and potential resultant noise levels at sensitive receptors with greater than 50% loading is required.
- c) Clarification as to the noise levels being quoted are for externally sited transformers or internal ones housed in solar stations. If solar stations are to be used to house all the equipment how will they be cooled and what noise impacts would result from cooling units serving these?
- d) Low frequency hum from any of the proposed fixed plant is an issue that needs to be considered, and technical evidence provided in any final report if predictions show negligible adverse impact. Measurements of the existing Burwell substation did not identify distinguishable low frequency components from transformers already on site, but no data has been supplied to provide confidence that low frequency hum will not be an issue at any residential properties in the West Suffolk area, taking into account potential maximum loading scenarios and the number and type of proposed inverters, transformers, and battery units that will be stationed at each of the proposed sites. In addition, the promoter should be providing confidence that the significance of operational noise impacts are sufficiently low that they will remain negligible under all weather conditions such as temperature inversions, positive downwind scenarios etc, and will not impact those properties who

may experience lower background noise levels at night than those reported in the Baseline Noise Survey.

- e) The assumptions made for the generation of the construction and operational noise models require further exploration and assessment. Plant items were modelled as point sources at a standard height of 1m above ground levels. Some of the fixed plant will be 3.5 m high with the battery storage containers 6m high. The proposals suggest that such items of plant will be grouped together and therefore confirmation that the cumulative effects of the equipment, in addition to their increased heights, will not affect the modelling results is required. Receptor points were set at 1m above ground. Night time receptor points would be bedrooms at 4.5m high and so account should be taken of this issue in any modelling scenarios.

Noise issues concerning the proposed extension to the Burwell substation (within East Cambridgeshire)

- a. There appears to be some inconsistencies in the rating noise level (L_A,T_r) at R1 that is quoted in Table 11-20 compared to that predicted in 11.8.24 and a different predicted L_A,T_r is then referenced in 11.8.26. Clarification of the actual rated noise level is required.
- b. Taking the figure quoted in Table 11-20 it identifies R1 as having a medium magnitude of impact under the operational noise assessment, during the night, early morning, and late evening periods. These are considered the most sensitive periods for noise impacts, as persons are more likely to be at home, enjoying their gardens during later summer evenings or resting. In any assessment of future noise impacts undertaking a BS4142 assessment on an industrial/commercial noise source and recording a +5dB difference between specific noise source and background levels could indicate complaints being likely. Referring to the implications of Section 158 of the Planning Act 2008 it is vital that all means are taken to not only be confident in predicted noise levels but also to mitigate them to the extent where sufficient noise impact protections throughout the lifetime of the development are in place. The mitigation being proposed is that of the building envelope of the residential properties in the vicinity (not able to be influenced by the promoter), with the conclusion that whilst noise may be audible inside properties, the absolute noise level is considered not to be of a sufficient magnitude (once assessed from inside the property), to warrant a significant noise effect. A minor adverse effect internally is therefore quoted.

Residents who currently experience low background noise levels outside their homes and correspondingly a quiet internal environment with windows open for ventilation, may consider otherwise and I therefore require further exploration of noise reduction measures in addition to the reliance on the efficiency of individual building structures, to provide the mitigation required to result in negligible significance internally and minor or negligible adverse impact externally.

- c. The rated noise level externally has been calculated in accordance with BS4142 to be 34 L_A,T_r, as per Table 11-20. In 11.8.20 it states that as the plant will be designed to have no tonal, impulsive, or intermittent features no

penalty/correction has been applied to this predicted level. 11.7.6 advises that the use of enclosures, local screening, silencers etc will be used as appropriate and should there be any such acoustic features present in the operational phases then a correction in accordance with BS4142 will be applied. This appears to contradict the earlier assertions. Any correction will increase the specific sound level and therefore the exceedance over background will increase. Such a scenario would therefore require further mitigation measures to be adopted to any currently anticipated. My question is also how is the operational noise, identified as a rated level of 34 in Table 11-20, described if it has no acoustic features? For example, is it a continuous drone, hum, buzzing sound etc and if so why is it not considered appropriate at this stage, for any correction factor to be added?

d. A measurement of existing tonal noise environment, and a calculation of future potential low frequency components of cumulative noise impacts an extension to the existing Burwell substation would have, was requested in early stage discussions. Background noise monitoring was undertaken between 12.45 pm on 5th Nov 2019 and 10.30 am 12th Nov in the vicinity of the Burwell site. The report suggests long term monitoring at L1 did not identify distinguishable tonal features in the local noise environment, with the conclusion being that "an expansion of the Burwell site is not expected to result in noticeable changes to the character of the existing noise environment."

e. The concerns I have with respect to this statement are:

The long-term spectrum results do not report on the third octave bands. Only octave band levels from 31.5 Hz to 8 kHz are tabled. Low frequency noise can often occur at 40 Hz and to identify if a low frequency component is present it is usually applicable to review the 10 Hz to 160 Hz range.

In addition, the results of the 7 days monitoring period are produced as an octave band day and a night average over the whole period. Plots of third octave Leq,5 mins over different 24 hour periods would reveal a more detailed pattern and allow more confidence in any conclusions that existing transformers on this site had no tonal content to be considered for cumulative low frequency impacts from an extension to the site.

The results that have been produced may suggest no tonal features, but I do not believe it fully addresses my original points of concern, that low frequency noise impacts from additional equipment must be fully considered and measures taken to mitigate any adverse impacts. Low frequency noise from transformers on large substation sites is an area of concern for many people living close to such sites. It is often reported that low frequency sounds vary in their audibility possibly during certain weather conditions or the number of transformers operating at any one time or the loading on the transformers themselves. Reports from persons affected by low frequency sounds generally suggest it can have a significant detrimental effect on their wellbeing. I do not consider the data to be sufficient at this time, to provide confidence that an expansion to the transformers on this site will not have a cumulative effect on low frequency noise levels in the vicinity of the Burwell site.

Framework Construction Environmental Management Plan –

a) Hours of work during construction phases are proposed to be between 0700- and 1900-hours Mon-Sat. Construction hours on development sites are restricted in West Suffolk to be between 0800 and 1800 Mon-Fri, 0800 and 1300 Sat and at no time on Sundays or Bank Holidays. Extensions to these hours have been agreed during the pandemic, when Government policy encouraged the relaxation of construction working hours, but only when adverse noise impacts could be appropriately controlled. Extended hours have therefore been adopted on other development sites within the District but has required agreement to additional measures to minimise noise impacts outside of the normal working hours. Such measures should equally be applied to this site, for example a commitment not to undertake the noisiest works prior to 0800 hours Mon-Sat, higher noise impact works to be completed by 1800 hours Mon-Fri and if working through to 1900 hours on Saturdays I would wish to see additional methods employed so that those tasks with the potential for higher noise impacts are adequately mitigated between 1300 and 1800 hours and are not undertaken after this time.

b) There is the suggestion in this document that site works may need to be conducted outside the core working hours. There should be no working undertaken on Sundays or Bank Holidays and this authority would not be supportive of any such requests.

c) The general information provided in the framework CEMP is agreed with respect to noise and dust controls and it is acknowledged that detailed CEMP(s) will be provided at later stages for individual subsections relevant to specific sites within the development. Although the mechanism for liaison with local authorities, residents and other parties who may have concerns is clearly described we highlight the importance of recording the actions taken to resolve any justifiable concerns received about noise and/or dust deposits. Such a log can positively influence future work methods and controls moving forward into later stages of the construction.

d) Noise monitoring proposals have been identified in the framework CEMP as a future noise control measure. 11.9.1 of Chapter 11 of the report suggests no additional mitigation, enhancement or monitoring measures for the construction/decommissioning and operational phases are required given that no significant adverse impacts have been predicted. The promoter should refer to the points raised in this response and provide further assurances either through additional monitoring or evidence, to satisfactorily address these concerns.

At this stage there is insufficient detail provided in the documents to consider the location of the Solar Stations containing inverters, switchgear and other associated equipment. The Preliminary Environmental Information Report in section 4.7.5 predicts the effects of noise to be negligible. The British Horse Society advice on Solar Farms noise explains that noise from inverters can be intrusive. This could potentially be disturbing to equestrian users, for example on the Bridleway 204/5. It should be noted that a horse's range of hearing is wider than a humans and sounds are audible at lower decibels. CCC would recommend that Solar Stations are sited away from the Public Rights of Way and new permissive routes, and where this is not possible, that suitable sound insulation is used to mitigate against disturbance to equestrian users.

Socio-Economics and Land Use

Land Use

Chapter 12 of the PEIR states that effects related to agriculture and soils has not been assessed at this stage. Given that the vast majority of the development site is in agricultural use this is disappointing. The ALC soil survey indicates that the land within Sunnica East A and B is predominantly classed as Grade 3b and 4. We are concerned that these surveys seem to understate the land quality of these areas, as indicated for example by Natural England's Regional Agricultural Land Classification maps⁵. Though these are strategic-scale maps, they indicate that there may be areas of grade 2 land located within the scheme. The promoter should publish the surveys relied on in the PEIR to allow them to be scrutinised.

Even if correct, while the survey indicates that the promoter has met the requirement to minimise impacts on the best and most versatile agricultural land, the PEIR does not acknowledge that the site is mostly productive agricultural land used for the production of crops such as potatoes, sugar beet, onions, carrots and maize. The importance of local food production should not be underestimated, and it is considered that the assessment of the proposal on agricultural land should not be limited to its classification. The Agriculture Bill 2019-21 contains a requirement for Ministers to consider the need to encourage the production of food in England, in an environmentally sustainable way. A further measure requires a report on food security at least once every five years.

West Suffolk Council would question the conclusion that as the sites are currently in agricultural use the scheme will not result in any employment loss (albeit that the PEIR then concedes that an estimated two temporary jobs will be lost). The evidence obtained by the promoter to support this assessment should be clearly set out in the ES.

West Suffolk Council and East Cambridgeshire District Council have concerns that the size of the scheme and the subsequent loss of agricultural land may also impact the ability of the Councils to deliver future housing and employment growth, while maintaining a suitable level of agricultural land.

Economy

In this chapter the Councils would expect to see references to relevant local policy in paragraph 12.2.7, such as:

- Norfolk & Suffolk Local Industrial Strategy
- Local Energy East Strategy
- Suffolk County Council's Raising the Bar Strategy
- Suffolk County Council's Suffolk Growth Strategy
- Transforming Suffolk: Suffolk Community Strategy 2008-2028

Section 12.4 is aimed at setting out the methodology for socio-economic assessment of impacts of the scheme.

⁵ See:

The use of baseline data and the assumptions made in this assessment are flawed to the extent that the figures produced cannot appropriately be used to assess impact. The use of the Cambridge Travel to Work Area (TTWA) as the area of impact is inappropriate for a number of reasons. First, the scheme covers a great deal of land in both the Cambridge TTWA and in the Thetford and Mildenhall TTWA and may include land in the Bury St Edmunds TTWA, so using only the Cambridge TTWA will not provide complete baseline. Second, the Cambridge TTWA will be distorted by the heavy weight of Cambridge's economy, which accounts for much of the travel within the TTWA. This distortion further reduces the relevance of this baseline to a scheme on the periphery of the TTWA with very different employment characteristics. Thirdly, the use of the Cambridge TTWA implies that workers from within West Suffolk are not local for the purposes of impact evaluations. This is clearly an undesirable outcome.

There is also a concern about the consistency of geography use. In section 12.6, East Cambridgeshire and West Suffolk are used for unemployment and economic activity rates. It would be preferable to be consistent in geography use to the extent possible.

For a project of this scale it would be more appropriate to define a bespoke TTWA using census data, perhaps using the two district geographies as a starting point. The selection of TTWA is relevant because it defines the leakage percentage used in economic additionality calculations.

The multiplier used in 12.4.19 to calculate indirect and induced employment gains (1.5) is high for a scheme like this. For example, the Scottish Power offshore wind projects have used a multiplier of 1.31 for indirect impacts and 1.21 for induced. The use of the ready reckoner from HCA Additionality Guidance Further is reasonable, but justification of the multiplier selected is necessary. Specifically, the assessment of supply chain linkages should be expanded on since it is expected that many components will not be sourced from the local or national economy.

Without justification for these assumptions, the calculations in section 12.8 are clearly unreliable and, by using an inappropriate statistical geography, are irrelevant to the real geography which will be impacted.

An assessment of the impact of the proposal on tourism should be undertaken. The proposal could result in visitors being deterred from seeking the solitude and long-distance views in many parts of the development. This would be to the detriment of both recreational and tourist objectives of the affected local authorities.

The PEIR does not appear to contain any reference to the Bay Farm Anaerobic Digester plant (ADP) and whether the scheme is likely to have any effect on the operation of the plant in terms of the production of feed to serve the plant and the associated traffic movements. It is anticipated that the loss of land areas E24 - E32 will have a direct effect on the ADP operations, which in turn will affect the surrounding villages through the resulting increase in traffic arising from the importation of feed to the ADP from further afield. An assessment of the impact of the scheme on the gas conversion plant located on land parcel E30 and the high-pressure pipeline crossing this area towards Gold Links Road is required

Site allocation policies in the former Forest Heath area Site Allocations Local Plan (SALP) 2019, including allocations of employment land, should be given considerable weight in the EIA process and referred to in the report as appropriate.

Sunnica East Site B is adjacent to existing and allocated employment land at Red Lodge. In addition, the site includes/is adjacent to SHELAA sites WS455 – deferred residential, and WSE04 – included economic.

Evidence to support the West Suffolk local plan review includes the 2020 SHELAA⁶. Site WSE04 is shown as an 'included' site in the 2020 SHELAA: 55ha of land for employment uses, land north of Elms Road and A11 northbound exit slip road to Red Lodge.

An Employment Land Review (ELR October 2016), produced to support the former Forest Heath area Local Plan (Single Issue Review of Policy CS8 [SIR] and Site Allocations Local Plan [SALP] 2019) 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.

The suitability of the site for employment uses was recognised at paragraph 6.45 of the ELR which refers to the site 'having excellent strategic road access being located on the A11 and relatively few other identified constraints.' The ELR also recognises at paragraph 8.37 that 'this could provide a good opportunity for a new employment site proposition of a genuinely strategic scale that does not exist elsewhere in the District and could benefit from its location on the A11 to capitalise upon growth corridor opportunities. This could also provide the potential to develop a critical mass of business occupiers and benefit from a greater level of operational flexibility away from incompatible uses such as residential...'. The site was not included in the emerging Site Allocations Local Plan as there was already a sufficient supply of employment sites at Red Lodge. However, the creation of West Suffolk has resulted in a review of the local plan, and the West Suffolk Issues and Options Draft Local Plan was published for consultation on 13 October 2020. Part Three – Settlements, section 3.6 Red Lodge includes a settlement map for Red Lodge showing SHELAA included sites with WSE04 clearly shown in green.

Insufficient consideration has been given as to 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 (West Suffolk Issues and Options Local Plan published for consultation 13 October 2020).

Insufficient or no evidence is provided or has not been addressed adequately in the PIER on the impact on some of the areas set out in EN1 – 5.12.3 (particularly those in ***bold italics***):

- *the creation of jobs and training opportunities;*

⁶ See: [REDACTED]

- **the provision of additional local services and improvements to local infrastructure, including the provision of educational and visitor facilities;**

- **effects on tourism;**

- *cumulative effects – if development consent were to be granted to for a number of projects within a region and these were developed in a similar timeframe, there could be some short-term negative effects, for example a potential shortage of construction workers to meet the needs of other industries and major projects within the region.*

West Suffolk Council has clear aspirations for infrastructure improvements to support existing communities and future growth. The following are of particular importance:

- A11 Fiveways – Highways England have previously expressed concerns regarding the at grade junctions on the A11 south of Fiveways. Longer term improvements for Fiveways Roundabout (for example at grade separation) and the at grade junctions will be considered for Highways England's RIS3 funding cycle, however there is no guarantee of funding at this stage.
- Improved transport links to the West of Mildenhall.
- Junction 38 - where the A14 meets the A11.
- Ipswich to Cambridge railway line – ability to deliver increased passenger or freight services.

The promoter should consider whether the project would compromise future growth opportunities and improvements to these key infrastructure points.

East Cambridgeshire District Council note that the Grid Connection Corridor goes very close to site allocations FRD6 and FRD7 (see adopted Local Plan 2015) in Fordham and the developer will need to show that its proposal will not damage the ability of these existing business to operate/expand nor would it affect any planning conditions that these land owners are required to comply with. The developer will also need to demonstrate that the proposal does not result in any detrimental impact to the horse racing industry in the local area (as required by Policy EMP6 within the adopted Local Plan 2015). In regards to policy EMP6 the comments in regards to Public Rights of Way (see below) hold greater weight, as any perceived or temporary loss of bridleways may harm the horse racing industry.

Community Impacts

NPS EN-1 highlights the need for equality, community cohesion and well-being to be assessed. Based on the information contained within the PEIR it is unclear whether these matters have been fully considered. In particular, the impact on the local communities affected should be explored further.

There is no reference in the PIER to legacy benefits, i.e. education and training opportunities, or a visitor centre. In addition, there is insufficient evidence that construction and operation jobs will be filled locally or that there will be long-term benefits in the form of skills enhancements. Further assessment of future skills development is required.

Transport and Access

Reference to Suffolk County Council and Cambridgeshire County Council as the relevant local Highway Authorities should be made with section 13.2, together with any associated national or local policy or guidance employed by the authorities.

Assessment Baseline and Impacts

Neither local Highway Authority has received meaningful engagement from the promoter in advance of the consultation period, so many of the details set out are being examined for the first time. Therefore, the highway authorities have not been able to agree in advance the baseline data used in the project's Transport Assessment. As a general point, the councils would advocate that the promoter looks to agree relevant assessment methodologies with the highway authorities prior to submission of the DCO.

Chapter 3: Scheme Description

It is understood that the construction programme will be 24 months; further information is sought as to whether this has impacted on any conclusions based on the 'temporary' nature of construction activities and whether an extended programme would affect these conclusions.

Further details of the connection of the access tracks will need to be provided to show that they are safe to use, with the need for an adequate length of access road that is of a suitable width to allow two vehicles to pass safely and that this is not obstructed by gates preventing vehicles leaving the public highway. The access roads will need to be designed to prevent trafficking of mud and debris or the flow of water onto the public highway.

The promoter states in 3.5.6 that open cut trenching will be the primary method used for crossing the public highways. The councils would prefer trenchless techniques to be used under highways to protect the fabric of the highway and reduce disruption to road users by temporary traffic management, except where this would have an unacceptable impact on archaeology.

We note that there is no preferred route published by DfT for high and heavy loads to travel between local ports and Burwell substation. Therefore, there is no protection against changes to such routes to permit future use for this purpose. Paragraph 3.6.12 sets out that the peak construction workforce is expected to be 1,260 on the average day. This has been assumed to mean the average day at peak construction and information is sought as to what the peak workforce day is, or at least how much variance there is likely to be between the average and the absolute peak.

The promoter states that workers will work 12-hour shifts (3.6.13). The councils request further evidence that this is practical, particularly in winter, and what measures will be in place to monitor and control this behaviour. The promoter places

much reliance on workers trips being outside typical peak travel times and failure of the shift system would result in transport impacts that will not be assessed in the ES.

Table 3-2 sets out the peak traffic figures; however, HGV figures are set out as movements, whilst light vehicle figures are not clarified whether they are movements or vehicles. It is worth noting that apart from the transport of materials, which equates to a peak of 160 HGV movements and average of 88 movements across all of the sites, there are also 61 additional HGV movements on average per month (i.e. 2 per day (plus potential variances) that need to be included in the assessment).

Within the DCO submission further evidence of the size and operation of the temporary construction car parks should be provided as evidence they are suitable for their proposed purpose.

Chapter 13: Transport and Access

Comments on access and HGV routing, including the movement of AILs are included within the response to the Transport Assessment and Access statement below.

Paragraph 13.3.1 of the PINS Scoping Opinion identifies a number of limitations to the assessment method due to the current pandemic, and the highways authorities recognise these limitations; however the promoter sets out that the use of certain traffic sources and the methodology used was agreed with SCC, which is said to be identified in the scoping opinion. SCC are not aware of agreeing this methodology, and on reviewing the scoping opinion the response on traffic data sets out that we "would expect to be consulted on the scope of the baseline traffic collection"; this was in response to paragraph 13.6.2 of the scoping report that set out that "the extent of the traffic data and scope of any traffic surveys that may be required will be agreed with the County Highway Authorities, as statutory consultees, where possible". It is somewhat disconcerting that these limited statements would be taken as acquiescence of the method identified. Therefore, we would state that the methodology has not been agreed, but we are happy to work with the promoter to come to agreement on a reasonable method especially given current limitations and recognise that some of the methodology may be considered reasonable following further discussions.

Some of the minor access roads leading to secondary access points have not been considered in paragraph 13.4.5. The promoter has not demonstrated that trips using these accesses are low enough for them to be scoped out. We are concerned about the absence of data on pedestrian and cycle movement and any conclusion that is drawn from impacts on this basis, especially when concluding that impacts would not occur due to the absence of pedestrians and cycles.

The assessment is based on an assessment of change in development peak hours, rather than network peak hours. These peak hours are identified as 06:00 to 07:00 and 19:00 to 20:00, which is said to reflect construction shift patterns. Little evidence is submitted to confirm that these hours of assessment are reasonable, especially considering that a large number of the conclusions that have been drawn by the promoter are based on impacts occurring during these hours (i.e. not the network peak hours). It is the councils' opinion that the environmental impacts

should be assessed more widely as for example peaks in receptor movements such as walkers or cyclists may not correspond with movements of construction traffic.

A plan showing the links identified for the assessment and the sensitivity of these links should be provided prior to agreement of the extent of the study area and categorisation of each link. The extent of links and the categorisations of links is not considered to be clear.

The proposed dismissal of impacts (paragraphs 13.4.7 and 13.4.8) of A142 / Landwade Road / Snailwell Road or A14 junction 38 are not accepted without further understanding of the development impacts, albeit that the A14 junction is the responsibility of Highways England. Absence of data is not considered a reasonable justification for not undertaking relevant assessment. Junction 38 has been modelled for local plans (e.g. Forest Heath Site Allocations Cumulative Traffic Impact Study) and past projects (e.g. past projects, for example for the Forest Heath Local Plan 2016⁷ and for the Hatchfield Farm) development and the councils disagree with the removal this junction from the transport assessment and ES. SCC would accept scoping out of the A142/Landwade Road/ Snailwell Road junction (paragraph 13.4.7), as stated by CCC in their scoping response.

The proposed assessment method is based on a worker vehicle car share factor of 1.5 persons per vehicle. Evidence of this level of car share being achieved at a similar development in a similar location should be submitted. Monitoring, enforcement and controls for achieving this level of car sharing needs to be embedded in relevant management plans, such as travel plan, otherwise the methodology cannot be agreed.

Severance

The existing levels of severance on each linked should be determined, so that a baseline level of severance can be presented.

All areas where a 10% change in traffic flows occur should be identified and those areas that require further assessment on this basis should be agreed with the highways authorities.

Consideration needs to be given to how severance is assessed within Design Manual for Roads and Bridges (DMRB) document LA112. For clarity, the changes between traffic flows that result on a low, medium and high impacts are not agreed, as they are coarse and are assumed figures rather than having been tested.

The methodology fails to assess impacts on different groups (e.g. young, disabled and elderly).

Pedestrian and Cycle Delay

The highways authorities are not certain where the proposed determination for impacts on pedestrian delay originate from; there are limited recommendations within Institute of Environmental Management and Assessment (IEMA) Guidelines for the Assessment of Road Traffic, and therefore the origin of these figures should be submitted.

⁷ Forest Heath

The assertion that the PROWs have generally low pedestrian flows is not agreed. This is also excluding the consideration of cyclists and equestrian users, for example on bridleway 204/5. We would require surveys to be carried out on all PROW impacted by the proposals to quantify the actual amount of usage, so a reasonable assessment of the impact can be made. This would better inform the conclusions in the PEIR Non-Technical Summary which suggests the impact on PROW as being moderate (Pp 44 Paragraph 4.11.7).

There are recommendations that the baseline level of pedestrian and cycle movement be determined. For clarity, the proposed assessment method is not agreed.

Pedestrian and Cycle Amenity

No justification is given for the lack of a proposed method to assess the relative amenity of journeys that are affected by the development. Indeed, we note that The Transport Assessment Paragraph 3.9 notes that the roads surrounding the site are generally lightly trafficked and therefore could encourage cycling. For clarity, the proposed assessment method is not agreed.

Driver Delay

The proposed omission of the assessment of driver delay is not agreed. Statements such as 'it is not anticipated that the delay on Elms Road T-junction will be significant' have not been evidenced.

Further clarification is needed over the potential for and number of Abnormal Indivisible Loads that are expected to be generated by the proposed development.

Fear and Intimidation

Consideration should be given to the baseline characteristics and the existing level of fear and intimidation based on existing flows. LA112 could be used to do this. The method for assessing change is considered to be reasonable, albeit that consideration needs to be given to those locations where impacts could easily change from one level of significance to another based on small changes in impacts.

Accidents and Safety

Paragraphs 13.6.45 and 13.8.17 claim to demonstrate that there are no road safety concerns. This is not agreed. The analysis of links is very subjective and does not consider frequency of use or length of link. Nor are thresholds given to indicate what level of collision rate is considered to constitute an issue. Detailed analysis of causation has not been undertaken. The impact of construction traffic on future collision rates has not been discussed in the PIER.

When assessing links as done at Table 3-10, it is useful to report this in number of incidents per km per miles travelled to then allow assessment against national data.

The councils would not agree that the data presented in the Transport Assessment (3.63 and 3.68) does not show incidents frequently occurring at any particular location. Specifically, there is a cluster at the A14/A142 junction proposed for use for access to the sites. This concern has been raised in past planning applications. At this stage the promoter has not commented on the influence of construction traffic on road safety.

Within the application the councils would expect to see more details regarding the access arrangements (swept path analysis, visibility, access widths and layout) to

show that they can be used safely by the proposed construction traffic. For example, access to the temporary car park east of Elms Road will require a significant number of light vehicles to execute a right-hand turn into the site against local and other construction traffic.

We have raised concerns about the narrow width of many of the access roads e.g. Elms Road. The councils would consider that surveys of the widths are necessary to allow an evidenced position to be made about their suitability and the effectiveness of any proposed mitigation such as passing spaces or widening.

Speeds of vehicles through local communities has yet to be analysed in detail. As the Local Highways Authorities, we have been made aware of local communities concerns that speed limits are not observed by a significant number of drivers.

Combined Impact

Consideration needs to be given to how the combined impacts of these topics interact; whether a number of minor adverse impacts would result in a moderate adverse impact in combination. This should include consideration of impacts on Public Rights of Way.

Link Sensitivity

Although the method of categorisation does not appear to be unreasonable, given the relatively small number of links being assessed, and that an absence of facilities does not necessarily mean an absence of users; the categorisation of each link should be agreed with the relevant highway authority.

Traffic growth

The method for assessing traffic growth is acceptable assuming that confirmation is obtained from the relevant planning authorities over any specific developments that should be considered as committed within the traffic assessment.

Peak Hour factors

Confirmation is sought on the method used for factoring to the assessed development peak hours.

HGV Controls

Limited evidence is submitted to support the assessed number of HGV movements. Further details are sought on how the network peak hours have been determined and what controls and enforcement will be in place to ensure HGV movements do not use the local highway network during the peak hours and stick to the proposed routing. It is expected that some form of GPS or ANPR system is used, as set out in the construction management plan and that this is enshrined in an appropriate legal agreement.

AILs

Further clarification is needed over the potential for and number of Abnormal Indivisible Loads that are expected to be generated by the proposed development. Including by relevant categorisation as follows:

- Category 1
- Category 2
- Category 3

- Special order movements.

It is understood that no AILs will travel to/from the site at present. Confirmation is sought that this is all AILs and not just special-order movements. As above, full details on all AILs should be provided.

More details of the routeing and dimensions of AILs, including overhangs and swept path analysis at junctions and sharp bends should be provided with appropriate topographic details of the existing highway infrastructure. The LHAs is concerned that the trimming of hedges will not be enough to facilitate AIL movements safely within the constraints of the existing highway.

Staff Vehicles

The project makes no attempt to encourage or achieve staff travel by pedestrian, cycle and public transport. The sites are in reasonably close proximity to a number of built up areas, and although may not be considered to be within walking distance are likely to be accessible by cycle. The distribution of workforce has been assessed based on a 30km spread of staff and by population density; on this basis it is reasonable to assume that proportions of staff will be travelling from similar built up urban environments, and given that the development start and end hours are suggested to be the same for all staff, it seems reasonable to assume that buses and mini buses could be used to move reasonable numbers of staff. A minibus should also be provided to/from the nearest railway stations to create the potential for longer distance journeys to be undertaken sustainably.

It is expected that there will be a commitment in a travel plan to achieve the assessed 1.5 persons per vehicle car share, with relevant enforcement and monitoring. It is suggested that this is done by monitoring the total vehicle movements arriving and departing each access. A Travel Plan must be submitted as part of the DCO and relevant commitments made with the Construction Traffic Management Plan.

Further information will be needed on the staff parking permit system and how this will be enforced.

Shift Patterns

No evidence is submitted to support the shift patterns assessed nor relevant proposals on enforcement to ensure that the impacts are commensurate with those assessed. This brings into question the validity of the assessment and all of the conclusions on impacts that are subsequently drawn.

Staff Numbers

Limited evidence is submitted to support the number of workers that is being projected for the sites' construction.

Staff Origins

For the assessment of transport effects, the distribution of population within the immediate MSOA has been used, clarification is needed on how this compares to the socio-economic assessment and use of the Cambridge Travel to Work Area for distributing staff. Further clarification is sought as to whether this workforce is expected to be drawn from the existing population or from in-migrant population.

Trip Generation

Limited evidence base is submitted to support claims about the number of operational staff that is being assessed. It is expected that relevant controls and monitoring is in place to ensure that the development does not exceed those figures has been assessed.

Overall Assessment Methodology

It would be helpful if the method of assessment included a tabular format highlighting the proportional change in traffic flows on each link, the sensitivity of each link and then compare these to the outlined criteria that are being assessed. It is not clear how the impact of vehicle flow changes on links is affecting their categorisation.

However, it is not accepted, as proposed within the assessment, that a change in traffic flows is considered to be reduced from major adverse to minor adverse purely because it brings those traffic flows closer to peak hour flows, without any indication for what this means for users of the network. It may be that significant severance occurs during the peak hour and simply bringing another hour to this level of severance and assuming that this is not considered to be an impact, is not considered to be acceptable.

It is not accepted that changes in flows have a minor adverse impact purely because there are not walking and cycling facilities. Further understanding of users of the network would be needed to reach any conclusion.

No evidence is submitted to support the arrival and departure profiles for HGV movements.

Often the change in flows is not considered to be significant as it occurs outside of the peak hours; however, no evidence is submitted to conclude that this would be the case, and so any conclusions drawn on this basis are not considered acceptable. There appears to be very little consideration of the impact of vehicles on cyclists, with most impacts dismissed due to the absence of pedestrian infrastructure. No assessment of decommissioning has been undertaken.

Appendix 13A: Transport Assessment

Transport

Evidence will need to be provided to demonstrate the promoter's assessment of the peak hour in paragraph 3.31 is accurate. If development traffic peaks are to be outside background peak times measures in the CTMP must embed this as a mitigation measure. The councils would seek greater comfort that HGV deliveries will be equally split across a 10-hour day as presumed in paragraph 6.14. Experience from other projects suggests that deliveries are focused in the morning.

Paragraph 3.3.1 sets out the staff working hours, as set out above, no evidence is submitted to support these travel times being assessed nor any controls proposed to ensure that this is the case. Therefore, this method of assessment is not currently accepted. The councils seek supporting evidence to support the comments made in paragraph 5.3 that shifts will last for 12 hours particularly in winter months. It also

notes that these shift patterns are generally incompatible with existing public transport timetables, particularly buses.

Confirmation is required that minibus trips are included in the trip assessment or scoped out by not using the local highway network.

Paragraph 3.3.4 identifies that it was agreed at scoping that the traffic flows within the Forest Heath District Council Site Allocation Cumulative Impact Study would be utilised. The document was actually highlighted to draw attention to capacity issues that have already been identified in the area - it was not agreed that these traffic flows could form a sufficient baseline dataset. Therefore there are limitations for this assessment which should be discussed with SCC. SCC do recognise the current limitations on the availability of data; however, for clarity, absence of data is not considered a reason for absence of assessment.

Confirmation is sought over the treatment of committed development sites as background growth. The potential exists that a number of sites should be treated as committed development and assessed accordingly. Further discussion is needed on this and clarification from relevant planning authorities on what should be included in the assessment.

Further detail is needed over the assessment method use for factoring to the assessed development peak hours, albeit noting above our concerns regarding the use of these hours for the assessment.

As above, paragraph 5.1 sets out the determined number of full-time staff during operation, no evidence is submitted to support this conclusion.

Paragraph 5.2 of the Transport Assessment sets out the assessment of trips for the operational and decommissioning phase has not been undertaken, as agreed at scoping; further clarity is needed on this, as scoping comments suggest that the application should include the assessment of decommissioning.

Further discussion is needed over the HGV numbers set out at Appendix G, it is understood that the busiest months are months 3 and 4 where there are 793 total HGVs, equating to on average 40 HGV movements per day. Further detail is needed on:

- the determination of these numbers
- the potential that other activities that have not started in Month 3 and 4 (such as Panels) could be going with this work still ongoing
- the potential day to day variation in HGV numbers
- What size of vehicles this includes (e.g. does it include LGVs)?

Paragraph 5.28 sets out details on how the origin/destination of staff has been determined; further information is sought on this, as well as the estimated proportions from each MSOA.

Paragraph 6.9 outlines the distribution of HGVs, whilst the absence of information on HGV origin is appreciated there are some concerns that it may result in an under assessment of impacts (particularly within the ES) on certain corridors. Further understanding of the potential implications of different splits in origins is sought. It is noted that the impacts on local roads are not included.

Further information is sought on Table 6-3 where the 'base + construction movements HGV' movements at the B1085 should be reviewed.

Justification of impacts is based on a comparison of traffic flows with those set out in the Forest Heath Local Plan; this is not currently accepted as a reasonable method without further understanding of the impacts and appropriate controls.

On reviewing the traffic flow changes at Appendix I, further understanding is needed on the impacts at the following junctions (depending on the absence of controls as well as other factors, this might include junction modelling), these include:

- B1102/ B1085 junction
- B1102 / Elms Road junction
- A11 Slip / Elms Road
- B1085 / Warren Road dumbbell roundabouts
- B1085 / A11 slip roundabout
- A14 / A142 junction
- B1506 Station Road junction
- B1506 / Herringswell Road junction
- A14 / A11 junction

Based on the above, the councils dispute the conclusions drawn at paragraph 6.13 and further understanding is needed.

Public Rights of Way

The councils' position is that PRoW should only be closed when absolutely necessary for safety reasons. Commonly on similar sites (EA1) rights have way have remained open except for when construction work is being undertaken across the route. Where closure is unavoidable suitable temporary diversions should be agreed with the relevant authority.

The councils note a reference in Fig 4.3 of potential permissive routes. As such routes can be removed at any time should not be considered to constitute mitigation.

The list of PROW closures during construction, (Pp24 of the Transport Assessment) includes footpath 204/1, assumed for the purpose of being crossed by secondary access F to West Site B W02, (as shown in the Transport Assessment, Fig 5-1, Pp28). Clarity is needed as to the exact alignment, to confirm if this impacts footpath 49/1. Provisions should be made either to enable safe crossing of either footpath throughout the works or if this is not possible, for the construction work to be scheduled to close this route for the shortest possible period. Secondary Access F to Sunnica West site B (as shown in the Transport Assessment, Fig 5-1, Pp28) is referred to elsewhere as G, and shown in various figures as not extending to connect to Chippenham Road.

Other Public Rights of Way comments are included on Page 34 of this response, under Landscape and Visual Amenity.

Access

The councils have concerns about the widths of the public highways being proposed as access routes by HGVs in paragraph 5.7 for both construction and operation of the project.

While access may have been used by agricultural vehicles, the intensification of use is likely to require improvements to make them acceptable. Improvements to the operational accesses shall be permanent whereas temporary access may require reinstatement. The promoter's attention is drawn to the requirement to prevent water and debris being brought or allowed to flow onto the public highway. It is presumed that the HGVs for fuel and waste mentioned in paragraph 5.18 will be to the primary access and that more details will be supplied in the application.

Construction Transport Management Plan

Paragraph 5.19 provides additional detail on this suggesting 101 HGV deliveries per day and further understanding is needed as to whether this figure should be assessed within the Environmental Statement. It implies that the peak deliveries across Sunnica West, Sunnica East, Cable Routes and Substation will be staggered. Further details of the vehicle movements during the construction of the project will be required to demonstrate this and to aid selection of appropriate controls in the CTMP

As above, further evidence or controls and monitoring is needed for the figures associated with the following:

- Construction workforce
- Workforce car share
- Workforce shift patterns
- Minibus proposals

The CMTMP should cap HGVs to 10 per hour as assessed (7.2) and staff vehicle trips (7.3) should similarly be controlled.

Parking

Some information is provided at the on the provision of car parking at paragraphs 5.30. Further details are required on the proposed provision and facilities.

At 7.5 a profile of access to / from car parks should be provided - 434 in and out in an hour, 7 / min on a single track road.

Transport Assessment: Appendix G

Does not appear to include workers and vehicle movement for Burwell Substation only internal substations. Not clear if civil engineering and / or electrical work refer to this or to the cable corridors.

Transport Assessment: Appendix H Access Strategy

Accesses

It is noted as part of the boundary changes there is an additional access near to the Burwell substation entrance described as Weirs Drive. It needs to be made clear the routing of construction traffic for this additional access. It is worth noting the nearest adopted highway to the access is via Anchor Lane which is in a residential area. Alternatively it could be via Weirs Drive and Byway (35/7b). This route passes residential properties as well as Burwell Recreation Ground. The impact on Weirs Drive and the Byway and/or routing to Anchor Lane will need to be assessed for their suitability.

As they relate specifically to accesses in Suffolk, SCC makes the following comments:

- U6003/6004 Elms Road is used to travel from the A11 to access points A, B and C is signed as unsuitable for heavy goods vehicles due to its narrow width. Evidence of vehicle over-run is present. In the LHA's opinion, the provision of passing places alone will not be sufficient to allow safe passage of vehicles along Elm's Road particularly during peak periods and that significant lengths of this road will need to be widened, which may in turn require removal of hedgerows. Fig J1 and J2 show workers trip using the access to the west of Elms Road (B) while all other documents show the car park is to the east (A). Due to the proximity of the temporary construction area adjacent to Sunnica East access B and the temporary car park at access A, the option of walking between sites appears practical provided safe access can be provided across Elms Road.
- C610 Newmarket Road to Sunnica East accesses D and H narrows travelling north away from the A11 and also shows signs of vehicles overrunning the verge, but is generally wide enough for most vehicles to pass each other. Removal of vegetation is likely to provide visibility for safe use of the access.
- C613 Golf Links Road leading to Sunnica East access I is also narrow with a relatively tight junction onto Newmarket Road.
- The C603 leading off the B1102 to Sunnica East access E is also a narrow single-track road, while the width of the C608 leading to accesses F and G allows two cars to pass but not HGVs.
- The C753 Snailwell Short Road reduces in width travelling north from the A142 towards Sunnica West access B and F with significant traffic calming adjacent to Plantation Stud and a hump backed bridge over the rail line. While widths are adequate for two cars to pass it would not allow two HGVs to pass.

In many cases the roads proposed to be used for access do not allow two cars to pass safely and certainly not HGVs. Significant improvements may be required to provide safe access for the construction and operational phases.

The majority of the local roads are bounded by hedgerows. The creation and amendment of accesses might require removal of significant trees and hedgerows to provide adequate visibility for example. These will need to be assessed within the Landscape & Ecology chapters

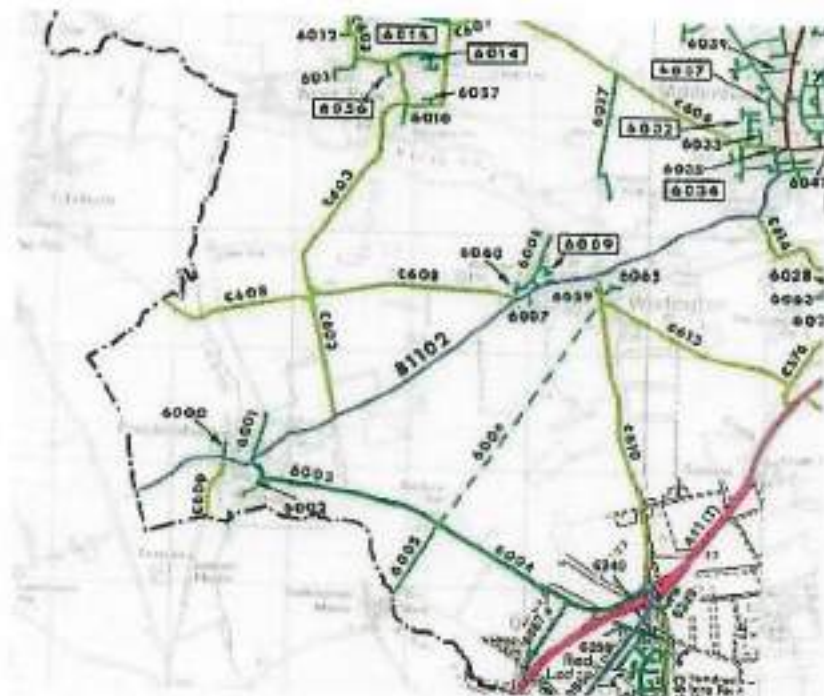


Figure 3 does not clearly show how HGV traffic from the A14 East accesses Sunnica West accesses A, C, D and E, but it is clear that many HGV routes use the A14 / A142 junction 37 at Newmarket. Understanding traffic movements at this junction are important not just in capacity terms, but also the impacts on road safety as there have been a number of accidents recorded at this location.

Road Safety

Areas where collisions have been recorded are:

- A11NB slip onto B1085/U6004 Elms Road (cluster at junction)
- B1102 Freckenham Road (number west of Worlington)
- A11 slip to C576 Newmarket Road
- A11 C623 Herringswell Road crossover
- A11 / A1101 roundabout Mildenhall and A11 south of this location
- A14 / A142 J37 Newmarket.

The scope for investigation should be agreed with the LHAs. While it is accepted that there are few alternatives to traffic U-turning at the A14/A142 junction this shows the importance of assessing impacts of the project at this location.

Abnormal Loads

With regards to Burwell Substation, the councils note that while special order AIL movements have been made between the Port of Ipswich and Burwell there is no preferred DFT route to this site. Therefore, this route has no protection for long term availability for this purpose.

Construction Traffic Management Plan

Some of the points below are repeats of points made on the documents above, but have been included for completeness.

The construction traffic management plan does not include any objectives for staff vehicle traffic; but does contain information on the assessment and number of staff vehicle movement. It is assumed that this would be covered by a staff travel plan; however, either way, it is expected that efforts will be made to reduce single occupancy vehicle movements by staff either through the Construction Traffic Management Plan or through a Travel Plan.

Paragraph 2.2.16 sets out a maximum number of HGV movements associated with the site. It is expected that monitoring and controls will be in place to ensure that these figures are not exceeded. This will be required to be enshrined through a relevant legal agreement within the DCO.

Paragraph 2.2.21 sets out the total staff employees and vehicle movements. It is expected that monitoring and controls will be in place to ensure that these figures are not exceeded. This will be required to be enshrined through a relevant legal agreement within the DCO.

Paragraph 2.2.22 sets out the assumed staff car share. As previously stated, information is sought on how this will be achieved, including what monitoring will be in place.

Paragraph 2.2.24 sets out the staff shift patterns. It is expected that monitoring and controls will be in place to ensure that these shift patterns are used. This will be required to be enshrined through a relevant legal agreement within the DCO.

Paragraph 3.2.2 and 3.2.3 provides details of the Delivery Management System; the mechanism for ensuring HGV numbers, timing restrictions, identification, emissions standards and routes will need to be enshrined in an appropriate legal agreement within the DCO, including relevant enforcement measures.

Paragraph 3.2.7 sets out timing restrictions so that HGVs avoid peak traffic hours, but does not state what the earliest and latest time an HGV can access the site on weekdays would be. This information should be provided.

Paragraph 3.2.9 sets out details of monitoring system with information on management provided at paragraphs 3.3.1 and 3.3.2. It is expected that all monitoring data will be recorded and reported quarterly to the relevant authorities, including any breaches that occur. Paragraph 3.2.14 states an average car occupancy is assumed to be 1.5 people per car. Monitoring of this will be required to ensure that this assumption is valid and thus car trips do not exceed those forecast. With regard to the parking permit system set out at Paragraph 3.2.19, thought will need to be given on the working of the permit system to avoid drivers not in possession of a permit parking inappropriately in nearby communities. This may require monitoring.

An estimate of the minibus movements on the public highway should be included within the transport assessment.

Details are sort on how HGV traffic will be managed in the event of an incident; including communication with contractors and the potential for rerouting movements to/from the site.

Aside from applying a generic car share factor, no consideration is given to minimising staff vehicle movements on the local highway network. It is expected that consideration be given to facilitating:

- Staff cycle movements to/from site.
- Potential bus/minibus pick up/drop off from key employment locations
- Potential bus/minibus pick up/drop off from relevant public transport hubs.

Further information is needed on expected AIL movements.

No details have been provided to show which access points will also be used as crossing points between work areas. The same level of detail will be required for these crossing points, as for the main access points off the public highway. This is necessary as different methods of traffic management may be required to make this manoeuvre safe.

Other Highways issues

Highway condition surveys should be undertaken before, during and after construction work that will include the construction traffic route from the strategic road network to the various development sites. The survey should include main carriageway surfaces, footways, verges, and any adjoining access points. Any areas identified to be in poor condition, especially those near to residential properties, should be improved prior to the commencement of the development. During construction routes should be monitored and remedial works undertaken where necessary.

All access points off the highway need to be appropriately designed and constructed to the relevant highways authority standards. Early engagement with highway engineers is encouraged.

Where existing accesses are to be utilised, further detail in respect of any upgrades or improvements required should be included in the DCO submission.

Golf Links Road is a narrow road, used by recreational walkers and cyclists and is, therefore, not suitable for HGVs. The road has hedgerows tight to the carriageway in many places which limits the ability to mitigate highway impacts through increased width or passing places for example. This road should not, therefore, form any part of a routing plan for HGVs.

The Councils question why existing farm tracks and accesses are not being utilised, for example, the internal road network in and around Bay Farm could be utilised instead of Golf Links Road. The suitability of an access point at E33 is also questioned, with access via E10 appearing more logical.

The proposal is close to Mildenhall which has considerable growth planned. For example, works are already underway for the Mildenhall Hub. There remains concern about constraints at key junctions within Mildenhall which will be difficult to mitigate. Cumulative traffic impacts need to be taken into account, not just for projects with planning permission but also allocated in local plans. Evidence is available through

the cumulative impact transport study produced by AECOM for the former Forest Heath area Local Plan⁸.

In the long term, constraints at key junctions within Mildenhall will become more difficult to mitigate without further modal shift and the potential for some form additional road capacity has been raised, including a relief road at paragraph 8.4.89 of the Transport Study. The Sunnica proposal should not compromise this longer-term aspiration or longer-term development potential of Mildenhall that might be brought forward through the emerging West Suffolk Plan.

Air Quality

The various legislation and guidance that is referred to within the report is acceptable. The report considered the construction phase road traffic emissions but does not consider the impacts from operational road traffic as the scheme will create little traffic once operational. We agree with this approach.

The application of Institute of Air Quality Management (IAQM) guidance to the assessment of construction dust is appropriate and the approach to mitigation, in which IAQM guidance is embedded in the CEMP, is also appropriate.

The report confirms that the maximum number of construction vehicles (including Light Duty Vehicles (LDVs) and Heavy Goods Vehicles (HGVs)) during the peak of construction will exceed 200 vehicles per day (anticipated to be over 200 HGV movements and over 500 LDV movements per day). The existing road network in the proposal is relatively low and the anticipated number of HGV and LDV movements will significantly increase traffic.

A detailed dispersion modelling exercise will take place to assess the impact of this change in traffic movements. Discrete receptors will be identified for the dispersion modelling. A scheme-specific nitrogen dioxide monitoring survey will take place for verification of the dispersion model, which was due to start in September 2020. It should be noted that the traffic flows for a monitoring survey starting in September 2020 may not reflect the long-term traffic flows and therefore levels of air pollution in the area and this should be considered during any subsequent assessment.

At this stage no assessment of the impact on local air quality from construction traffic has been carried out, however, it is acknowledged that an impact is possible, and an appropriate assessment based on site specific information is proposed. We accept this methodology, but we would recommend caution with the use of baseline data collected during 2020 and early engagement on the selection of sensitive receptor locations.

Human health

⁸ See:



Battery Safety

The promoter will need to demonstrate that safety and security risks associated with the development have been thoroughly assessed. The councils are concerned that the risks associated with battery storage fires have not been fully explored and it is imperative that an outline Battery Fire Safety Management Plan is submitted with the DCO application.

Suffolk Fire and Rescue Service (SFRS) will work and engage with the developer as this project develops to ensure it complies with the statutory responsibilities that we enforce.

Sunnica should produce a risk reduction strategy as the responsible person for the scheme as stated in the Regulatory Reform (Fire Safety) Order 2005. It is expected that safety measures and risk mitigation is developed in collaboration with services across both counties.

The strategy should cover the construction, operational and decommissioning phases of the project.

During the construction phase the number of daily vehicle movements in the local area will significantly increase. The services will want to view the transport strategy to minimise this impact and prevent an increase in the number of road traffic incidents. Any development should not negatively impact on the services' ability to respond to an incident in the local area.

The use of batteries (including lithium-ion) as Energy Storage Systems (ESS) is a relatively new practice in the global renewable energy sector. As with all new and emerging practices within UK industry, the SFRS would like to work with the developers to better understand any risks that may be posed and develop strategies and procedures to mitigate these risks.

The promoter must ensure the risk of fire is minimised by:

- Procuring components and using construction techniques which comply with all relevant legislation.
- Developing an emergency response plan with both counties fire services to minimise the impact of an incident during construction, operation and decommissioning of the facility.
- Ensuring the BESS is located away from residential areas. Prevailing wind directions should be factored into the location of the BESS to minimise the impact of a fire involving lithium-ion batteries due to the toxic fumes produced.
- The emergency response plan should include details of the hazards associated with lithium-ion batteries, isolation of electrical sources to enable firefighting activities, measures to extinguish or cool batteries involved in fire, management of toxic or flammable gases, minimise the environmental impact of an incident, containment of fire water run-off, handling and responsibility for disposal of damaged batteries, establishment of regular onsite training exercises.
- The emergency response plan should be maintained and regularly reviewed by Sunnica and any material changes notified to SFRS and CFRS.

- Environmental impact should include the prevention of ground contamination, water course pollution, and the release of toxic gases.

The BESS facilities should be designed to provide:

- Automatic fire detection and suppression systems. Various types of suppression systems are available, but the Service's preferred system would be a water drenching system as fires involving Lithium-ion batteries have the potential for thermal runaway. Other systems, such as inert gas, would be less effective in preventing reignition.
- Redundancy in the design to provide multiple layers of protection.
- Design measures to contain and restrict the spread of fire through the use of fire-resistant materials, and adequate separation between elements of the BESS.
- Provide adequate thermal barriers between switch gear and batteries,
- Install adequate ventilation or an air conditioning system to control the temperature. Ventilation is important since batteries will continue to generate flammable gas as long as they are hot. Also, carbon monoxide will be generated until the batteries are completely cooled through to their core.
- Install a very early warning fire detection system, such as aspirating smoke detection.
- Install carbon monoxide (CO) detection within the BESS containers.
- Install sprinkler protection within BESS containers. The sprinkler system should be designed to adequately contain and extinguish a fire.
- Ensure that sufficient water is available for manual firefighting. An external fire hydrant should be located in close proximity of the BESS containers. The water supply should be able to provide a minimum of 1,900 l/min for at least 2 hours. Further hydrants should be strategically located across the development. These should be tested and regularly serviced by the operator.
- A safe access route for fire appliances to manoeuvre within the site (including turning circles). An alternative access point and approach route should be provided and maintained to enable appliances to approach from an up wind direction. Please note that SFRS requires a minimum carrying capacity for hardstanding for pumping/high reach appliances of 15/26 tonnes, not 12.5 tonnes as detailed in the Building Regulations 2000 Approved Document B, 2006 Edition, due to the specification of our appliances.

Electromagnetic effects

The PEIR states that the scheme is unlikely to interfere with telecommunications and television reception but does not explain how this conclusion has been reached.

The promoter should consider the issue of electromagnetic fields in relation to human health, in consultation with Public Health England. The National Policy Statement for Electricity Networks Infrastructure (EN-5) highlights that whilst putting cables underground eliminates the electric field, they still produce magnetic fields, which are highest directly above the cable and can have both direct and indirect effects on human health.

Other health and wellbeing impacts

The Councils, as Public Health Authorities, have not had the opportunity to review the documents at this stage but reserve the right to make comments in due course.

Sunnica Ltd. is required to satisfy the EqIA requirements when they submit their application to the Secretary of State. This assessment must account for people with protected characteristics and, in particular, must consider whether impacts of the scheme such as glint & glare or noise might affect people with physical or mental health conditions.

The PEIR does not seek to address the impacts of the scheme on the mental health and well-being of the affected populations. This is especially relevant in respect of the elderly and those residents that are vulnerable. In particular the construction and decommissioning phases will result in significant amounts of disruption to existing communities and this needs to be considered in relation to mental health and well-being.

Waste Management

The amount of waste requiring managed disposal following decommissioning is substantial. Reusing or recycling old panels would be required before material is disposed through landfill. While the PEIR refers to the possibility of components being recycled it is unclear on current and likely future techniques and whether these would be more costs effective than disposal.

The PEIR proposes a Construction Resource Management Plan (CRMP) to form part of a Construction Environmental Management Plan (CEMP) to deal with the management of waste. Suffolk County Council, as the waste planning authority for Suffolk, consider that this is an acceptable approach and does not expect the quantities of waste to warrant objection. The Councils would appreciate sight of the relevant management plans in advance of submission as the framework CEMP deals with waste very briefly.

Other Environmental Topics

The Councils do not feel that the Considerate Constructors Scheme is a robust enough standard to ensure that a project of this size and national significance is appropriate for managing and reducing the environmental impacts arising – especially in relation to the operational impacts from energy and waste, water.

The project should be setting out an approach that will have clear targets to meet for reducing emissions in relation to those set out and then the monitoring, management and verification systems in place to ensure that the project does deliver a net zero emissions development.

The Councils' main concerns are related to fuel use on site; in relation to vehicle journeys to and from site; waste volume arising, and recycling rate set out. This project should be setting an exemplary approach to waste management and recycling and this should be made clear as a target to be achieved.

Contaminated land is dealt with in Chapter 16 of the PEIR, and refers to a Preliminary Environmental Risk Assessment undertaken by AECOM dated December 2019, that is included as Appendix 16B.

The assessment includes the findings of a site walkover and a desktop review of pertinent geo-environmental information. The walk over identifies a number of minor potential sources of contamination on the site and in the surrounding area. The historical map review also identifies a small number of historical uses that are potentially contaminative, although the majority of the site has remained undeveloped throughout the historical period studied. Areas of note included a number of tanks; potentially infilled land; former agricultural structures with potential asbestos containing material and a generator with evidence of oil contamination surrounding.

The assessment recommends that there are intrusive investigations at post consent stage to further assess the contamination status of the ground. Predominantly this would be to assess the potential of impact on the controlled waters (underlying principal aquifer and surface waters). We are in general agreement that the risks have been appropriately identified and that it would be appropriate to undertake the intrusive investigations following consent (should consent be granted) to assess the identified risks.

Effect Interactions

Summary of Environmental Effects

In relation to Table 18-1, the Climate Change section of the table states "No significant residual effects on climate change are predicted during construction of the Scheme." We would like to see some information that quantified what the land use change impacts may be on soil carbon and carbon sequestration from vegetation as this could be significant locally. Similarly, the same point is made in respect of the Ecology Section and the water environment particularly soil run off during construction and its impacts on the water environment.

Other matters/General

Given the importance of The Brecks and the ecological interests found within them West Suffolk Council expected that specific reference to Natural England and the RSPB would be more frequent within the PEIR. The absence of such reference casts doubts over the involvement of these organisations in the development of the scheme and it is expected that the ES will address this.

The promoter should undertake an Equality Impact Assessment.

Where outline management plans are to be presented with the DCO application the promoter should ensure that, where relevant, interactions between the plans are considered. Where mitigation measures in one plan are reliant on measures in another plan this should be clearly referenced, and appropriate mechanisms put in place to secure delivery of such measures.

To date the promoter has offered very little detail with respect to community benefits.

The joint response of West Suffolk Council and Suffolk County Council to the non-statutory consultation (dated July 2019) contained reference to future growth in Mildenhall. These comments do not appear to have been addressed and the promoter's attention is again drawn to this matter. It is imperative that the proposed scheme would not prejudice future growth in and around Mildenhall.

Similarly, it should be demonstrated that the promoter has engaged with the Cambridgeshire and Peterborough Combined Authority in respect of the Cambridge Autonomous Metro.

Freckenham Parish Council are in the early stages of preparing a Neighbourhood Plan, with the neighbourhood area designated on 2 November 2018. Isleham is also in the early stages of preparing a Neighbourhood Plan, with its area being designated on the 21 February 2019 that includes some of the Sunnica site.

Effects on mineral resources were scoped out of the EIA by PINS, and Worlington Quarry has been removed from the red-line boundary. The promoter may wish to consider the effects of dust on the panels from Worlington Quarry.

Throughout this response the Councils have detailed where further information and/or assessment is required. The following is a brief summary of a number of requests for further information and should be read in conjunction with the remainder of this response:

- The need for local and regional perspective on GHG emissions evaluation to be undertaken – not just in relation to the national carbon budgets.
- The Net Zero Emissions trajectory for the UK and the need to balance energy generation alongside other issues such as soil carbon storage.
- The calculations in relation to soil carbon storage and sequestration that were used to determine the professional judgement as to the baseline GHG emissions.
- The details of the energy generation peak capacity, the battery energy storage system (BESS), its location and operation.
- A review of the stated energy generation and operational GHG benefits to ensure Completeness, Accuracy, Consistency, Relevance, and Transparency.
- Comparison to alternative technologies and how these achieve the development objectives and to aid our understand for diversification in energy generation in the Eastern Region.
- An improved management on the stated Considerate Construction Scheme (CCS) of the operational impacts of the development to ensure it delivers Best Practice and a demonstrable ambition for Net Zero Emissions from the development.
- A more detailed breakdown of the vehicle journeys for staff in relation to the development areas.
- A Travel Plan that will actually lead to a reduction in the proposed vehicle journeys.
- Confirmation as to whether the applicant intends to make provision for any temporary living accommodation on site for staff and/or make land available for privately owned accommodation to be sited?
- Targets for fuel, waste, water and energy consumption reduction for the construction and operation phase.
- A reporting mechanism that will demonstrate the progress against the targets.

- Details of how topsoil will be managed, retained, and reused onsite to enable local biodiversity improvements during the operation phase.
- How was the search radius of 15km from the Burwell substation arrived at?
- That the cumulative impact of other planned and existing solar development in the vicinity of Burwell substation has been taken into account.
- How have the geographical location, local weather patterns, pollution levels and damage or failure of the key components been considered in relation to the overall effectiveness of the scheme?
- The necessary corrections and/or additional assessment information should be included in the Cultural Heritage chapter.
- Further ecological assessment is required together with additional detail on the mitigation measures.
- Further detail and assessment work are required in respect of the socio-economic and land use chapter. In particular, the impact of the scheme on agricultural land should not be limited to its classification and consideration should be given as to how the scheme will impact upon future growth opportunities and the delivery of infrastructure improvements in the effected authorities.
- It is strongly advised that block plans at a scale of 1:500 are also submitted to allow for more detailed assessment of the proposal.
- Details of the decommissioning process are required prior to the submission of the DCO application and it should be demonstrated how this process will be financed and managed.

From: [Worlington Parish Council Clerk](#)
To: [Sunnica Energy Farm](#)
Subject: Comments on Adequacy of Consultation for the Sunnica Application
Date: 29 November 2021 14:53:35
Attachments: [210706 Inadequacies of Sunnica Consultation Letter - Worlington Parish Council.doc](#)

Dear Sirs

Please see attached comments from Worlington Parish Council regarding the Adequacy of Consultation, in relation to the Sunnica Energy Farm application, for your information.

Regards,

Vicky Bright
Clerk to Worlington Parish Council

Tel: [REDACTED]
worlingtonparishcouncil@live.com
3 Scott Avenue, Mildenhall, Suffolk IP28 7LT (Appointment only)

Office Hours Mon-Fri 9:30am - 2:30pm. Monday & Thursday evenings 6-7pm.
Please be aware that I work part-time, so there may be a slight delay in my responses.

Worlington Parish Council

Parish Office, 3 Scott Avenue, Mildenhall, Bury St Edmunds, Suffolk IP28 7LT

Tel: [REDACTED]

worlingtonparishcouncil@live.com

6th July 2021

Dear Sirs,

Worlington Parish Council would like to raise concerns that many of our residents found that Sunnica's Statutory Consultation was inadequate.

We request that this letter and accompanying documents, are shared with the Planning Inspectorate as part of the Council's "Adequacy of Consultation" representation during the Acceptance phase. This request is per paragraph 7.1 of the Planning Inspectorate's Advice Note 2 "The role of local authorities in the development consent process".

Worlington Parish Council is a member of the Parish Councils Alliance - Sunnica Group, and endorses the list of inadequacies found by this group, a copy of which is attached to this letter.

Finally, Worlington Parish Council carried out a household survey, that was sent to all households in Worlington, on the Sunnica Statutory Consultation, using four standard questions supplied by the Parish Councils Alliance, Sunnica Group. The survey results are also attached.

Yours Sincerely,

Vicky Bright (CiLCA)

Clerk, Worlington Parish Council

From: [REDACTED]
To: [Sunnica Energy Farm](#)
Subject: Fw: Inadequacy of Sunnica consultation
Date: 02 December 2021 23:11:19

Dear Sir/Madam,

I understand that Sunnica has submitted its application for their solar farm proposal, and that you are currently reviewing the adequacy of their consultation.

Personally, I feel that this has been inadequate. I am forwarding an example of some of the correspondence I had with one of the host authorities during the statutory consultation process. These points were also made to Sunnica at the time.

Many thanks in advance for your consideration.

Yours faithfully,

Catherine Judkins

On Sunday, 11 October 2020, 22:53:43 BST, Catherine Judkins <cmgjudkins@yahoo.co.uk> wrote:

Dear Councillors Huffer and Schumann

I hope you are well.

I attended one of the Sunnica webinars yesterday afternoon and I have to say that I found a real air of arrogance amongst them that they consider this proposal a 'done deal.' They assured us 100% that they have secured grid connection already at Burwell substation (which was believed to be full). They talked about not having yet secured all of the land they required for the cabling routes, but that they were in dialogue with the landowners. They talked about compulsory purchase - they will definitely undertake this, albeit as a last resort, in order to steamroller this project ahead. They acknowledged that the scale of the scheme was huge but hoped that we'd 'learn to live with it.'

This statutory consultation is already nearly 3 weeks underway and it is far from fair. Sunnica did admit yesterday that there were specific concerns with Isleham village about the fact that during the pre-consultation phase last year the proposed solar farm area around Isleham was not on the map, thus meaning that the *only* relevant consultation we have had as a village is during the Covid-19 pandemic, where they are not offering any face to face meetings. I did point out during the webinar that the villagers were not locked away in their houses during the pandemic and that there were ways to engage face to face with us, in a socially distanced way and within the government guidelines, without holding large scale public meetings. They seem at a loss as to how they can do this (or rather, they are using the pandemic as an excuse not to even try) and are putting the onus back on the Parish Council and other villagers to seek out those who cannot access the online consultation to make sure they are informed. This is not right. We do not have the details of the project to inform other people in the village. This has to come from them.

So far they have held 4 webinars, which have not been at all well advertised, and hence not that well attended (typical attendance is around 19-20 people across all villages affected, whereas the Zoom meeting that Lucy Frazer MP held recently had 42 attendees from Isleham village alone and additional people making contact ahead of this asking those that could attend to submit questions as they couldn't be there themselves). Sunnica still haven't grasped (despite being told multiple times) that there is a significant proportion of the population here that cannot access the online consultation - either they do not have internet connection or they have internet but do not know how to use Zoom or what a webinar even is. Sunnica said these people can call them using the phone number they provided - but many older residents are nervous about this and don't quite know how to voice their

concerns over the telephone. They don't want to be singled out - they would feel more comfortable asking questions alongside others or in person. The consultation is completely prejudiced against the older residents and those who are not fully computer literate.

In addition, these webinars are meant to be recorded so that people can access the information if they cannot attend the 'live' ones. But they have only uploaded 1 of the 4 webinars they have held so far onto their website. So we still cannot access any webinars that we may have missed, or access any of the Q&A responses. This feels like deliberate withholding of information to allow us to make an informed decision before completing our questionnaires.

The hard copy PEIR is still not available in Isleham village, despite them acknowledging several times during the webinar yesterday that this is a VITAL document as it contains much of the detail about the proposed scheme. They tried to imply that [the blame for] this sits with the Parish Council to find a location for this, but if they genuinely wanted to make the PEIR available, surely they can find a way of getting a copy to the village directly. Luke Murray of Sunnica claims he knows every inch of this area as he has visited so many times...and yet he cannot find a location to site a paper document. I don't believe this at all.

I am also hugely concerned at the process here. Sunnica said yesterday that our questionnaires will be collated by them, the responses will then be transferred by them into a format where they are able to add in their assessment of the concerns raised and any mitigation measures they might undertake. They then send this to the Planning Inspectorate for independent review. They have assured us that all original copies of the questionnaires will be kept and that there are procedures so that this compilation of data is done correctly. But I am sure you will agree that there is huge scope here for Sunnica to 'fudge' the questionnaire replies, to perhaps 'misinterpret' some of the questionnaire responses while they reformat them for review by the Planning Inspectorate.

Please can you try to find out if there is any way that the questionnaires can be submitted to an independent party. They could then format these into a framework that could be sent to Sunnica to add their response/ mitigation measures, and then this document be submitted to the the Planning Inspectorate for review.

As it stands, the Planning Inspectorate is set to receive soil studies that have been commissioned and paid for by Sunnica, biodiversity studies that have been commissioned and paid for by Sunnica and also a summary of the questionnaires that have been collated and filtered by Sunnica. Plus landscape surveys, socio-economic surveys etc etc , all of which have been funded/ supplied by them.

This does not sound independent at all and does not bode well for a non-biased review by the Planning Inspectorate. We already know that Sunnica's soil assessments are not in agreement with the assessments by Natural England (Sunnica has 'downgraded' the soil quality so that it looks poor. But it is, in fact, very good soil and produces high yields of a variety of crops. It fared particularly well in the early parts of this year when other areas of the country lost crops through the floods etc.)

Sunnica was also unable to answer questions about the safety of the BESS in the webinar yesterday, claiming that the storage sites for these were in areas well away from housing (despite there being a farm less than 800 m away from the one near Isleham). But they did not know what actually constituted a 'safe distance' from properties. A battery storage system on this scale has never been done in the UK and they have yet to determine the Fire Safety Management system they will put in place (even though battery fires cannot really be put out and while they are burning they are emitting toxic gases). This is a significant omission as there are very well documented fire safety risks with these Lithium ion BESS and the villagers have a right to know about the safety implications DURING the consultation process, not after!

Regarding decommissioning - apparently the detail of how they decommission will be determined in the 12 months prior to the decommissioning taking place. Sunnica did not commit to providing a 100% guarantee that ALL recyclable components would be recycled, regardless of cost, and they also swerved offering a 100% guarantee that the components would not end up in landfill. They just said that Sunnica would be held accountable...but this is meaningless if they have gone into administration and they have not left enough money in a bond for all the necessary recycling to be done.

Please can you ask them about this?

On a separate note, I believe Councillor Huffer had wanted to come out and visit the sites to appreciate the expanse and the impact on the residents first hand. Have you managed to find a date for this? Would you be willing to meet any residents during your visit? I have been helping Isleham Parish Council with some door knocking exercises and I am finding the emotions of the older residents in Isleham are running high about this Sunnica proposal. A few have talked about the plane crash after WW2 just outside the village where 12 members of a US bomber crew lost their lives when their plane developed a fault. They deliberately steered the plane to avoid the village and crashed into a field. This field, close to the Ark church, is on target for the Sunnica proposal. The residents feel that this site should remain as it is, and how it always has been, in honour of those who lost their lives there. They feel very passionately that it should not just be covered over by an industrial solar park. They don't know how to express this to Sunnica.

Thank you again for your time on this subject.

Yours sincerely,

Catherine Judkins

From: [REDACTED]
To: [Sunnica Energy Farm](#)
Subject: FAO Michele Gregory
Date: 03 December 2021 14:45:58
Attachments: [SNTS CAG AoCR 28Nov21_rev1.pdf](#)

Dear Ms Gregory,

I understand that Sunnica has submitted it's energy farm application and that you are currently assessing the adequacy of their consultation.

Please see attached a report put together by the Say No to Sunnica Community Action Group, detailing the reasons why the communities here felt that the consultation was inadequate.

I do hope that you will take this into consideration, as the report is drawn from substantial feedback from local residents.

Many thanks for your time, and please acknowledge receipt of this email.

Best regards,

Dr Catherine Judkins

(on behalf of the Say No to Sunnica Community Action Group)



SUNNICA ENERGY FARM

INADEQUACY OF PUBLIC CONSULTATION

SAY NO TO SUNNICA COMMUNITY ACTION GROUP

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2. Introduction

- 2.1.1. **Say No to Sunnica** is a local community action group (CAG), with volunteers from across the 16 parishes affected by the solar and battery plant proposal that is being applied for by Sunnica Ltd.
- 2.1.2. This report is not a representation about the Sunnica proposal; it focuses solely on the adequacy of the consultation process. The report has been written to assist the Planning Inspectorate and Local Authorities with assessing if the applicant's consultation has been adequate further to Section 47 of the Planning Act 2008. With respect to the applicant's duties under Section 49 of the Act these will form part of our written representations when invited.
- 2.1.3. Sunnica Ltd (Sunnica) in this report is taken to be Sunnica and it's agents/representatives.
- 2.1.4. Sunnica carried out a limited non-statutory consultation for their proposal in June/July 2019. Only preliminary information was available at that time, and the scheme boundary was quite different to that outlined in the Statutory Consultation, which ran between 22nd Sept - 18th Dec 2020, during the escalating Covid pandemic and second national lockdown.
- 2.1.5. The Statutory Consultation has been described by District and County Councillors as "woefully inadequate". Primarily, the consultation took the form of a 'high level' booklet that was distributed to households in some of the villages affected by the scheme. This was supported by online-only information, which was highly technical and not accessible to all. There were no public 'in-person' discussions, and there were no physical displays - manned or unmanned - in the affected areas. Public webinars were arranged but these took the form of a monologue by Sunnica followed by questions that had to be put in writing using the chat function, with no two-way dialogue.
- 2.1.6. Whilst we appreciate that during the Covid pandemic, virtual consultations were permitted, we feel very strongly that additional regard **MUST** be made to the guidance notes issued by the Planning Inspectorate to ensure that consultations undertaken during such unprecedented conditions are as inclusive as possible, and that they allow on-going fair participation.
- 2.1.7. Responding to the pandemic the Government passed the Infrastructure Planning (Publication and Notification of Applications etc.) (Amendment) Regulations 2020 which

came into force in July 2020. These regulations provided for physical documents being available locally to be replaced by a website. Government guidance on how information sets out that applicants should ensure the relevant website is well signposted when publishing their notices and that the documents are readily accessible, i.e. documents should be clearly named and logically structured. Guidance also requires that hard copies of any relevant documents must be provided on request. This guidance applies to depositing of physical documents being replaced by placing on a website, it should not be taken to replace exhibitions and meetings where safe to do so.

- 2.1.8. Sunnica's Statutory Consultation did not adhere to this guidance and did not comply with their Statement of Community Consultation (SoCC).
- 2.1.9. Consultation, by definition, implies discussion. The exchange of thoughts to refine an outcome. This is key to the public consultation process in the Planning Act 2008 (The Planning Act). This report highlights the lack of opportunity for public, two-way discussion during, and after, the Statutory Consultation. It provides an overview of the flaws that were brought to our attention by residents through direct communications, as well as surveys that we have undertaken (Appendix 1).
- 2.1.10. It should also be noted that these failings in consultation were highlighted to Sunnica by the CAG and Parish Councils during and after the non-statutory consultation, as well as in the run up to the Statutory Consultation, and during the early weeks of the Statutory Consultation period. Residents wrote letters to Sunnica explaining why the consultation was not working effectively, suggesting improvements that could be made to enable fair participation to more residents and to allow a better assessment of the impact.
- 2.1.11. Councillors and local MPs also contacted Sunnica, expressing the same concerns.
- 2.1.12. During the webinars, residents used the chat function to suggest improvements to the way the consultation was being handled and to express difficulty accessing material etc.
- 2.1.13. Sunnica Ltd had ample time to react and make amendments to the way their Statutory Consultation was being carried out. They did not react and persevered with an ineffective consultation methodology. We feel that the application cannot be accepted at this stage as the requirement for adequate consultation has not been met.

3. Why The Consultation Was Inadequate

3.1. Confusion about Location of the Scheme

- 3.1.1. The Sunnica consultation material gave the impression that the scheme was in Cambridgeshire. In fact, the scheme is in West Suffolk and East Cambridgeshire. Many residents in Suffolk would not necessarily have recognised the impact on them from the advertisements that Sunnica displayed in newspapers.
- 3.1.2. This confusion arose as the scheme was described as a “Solar Energy Farm and Battery Storage Facility Connecting to the Burwell National Grid Substation in Cambridgeshire.” The immediate conclusion is that a) the scheme is at Burwell and b) it is wholly in Cambridgeshire. An extract from the SOCC is shown in Figure 1, but the same description is also used in the Statutory Consultation booklet. Figure 13 shows a newspaper advertisement run in the local newspapers that only refers to “Connecting to the Burwell National Grid Substation in Cambridgeshire”. The statutory advertisements correctly referred to “located near Chippenham and Snailwell in Cambridgeshire, Isleham in Cambridgeshire and Suffolk, and Worlington and Freckenham in Suffolk” but these are unlikely to be read widely.
- 3.1.3. The primary impact of the scheme is not at Burwell. The other local communities are not mentioned in the Consultation booklet until page 6 and even then they are listed under a banner heading that refers to Burwell. Only on the small-scale environmental plans are Cambridgeshire and Suffolk mentioned.
- 3.1.4. People typically do not read past the introduction if they feel that the scheme does not relate to them, and the introduction failed to identify the precise location of the scheme. A small-scale plan opposite the Introduction in the consultation brochure lacked context, did not identify local waypoints and landmarks, and lacked a north point. All community names are in grey text, hard to read and lacking contrast for people with restricted eyesight. No information was provided in the brochure as to the availability of large text versions or where audio described versions could be obtained.
- 3.1.5. Given the emphasis on Burwell, a location where there are already a number of operational solar farms and proposed solar farms, a casual reader from any of the impacted communities might be forgiven for assuming the Sunnica scheme did not affect them.

Introduction

We're inviting feedback from local people on our proposals for Sunnica Energy Farm.

Sunnica Energy Farm is a proposed new solar energy farm and battery storage facility connecting to the Burwell National Grid Substation in Cambridgeshire.

FIGURE 1 - EXTRACT FROM SOCC

- 3.1.6. The vast size and scale of the Sunnica scheme (around 2500 acres) was also not highlighted in the consultation material. This would have enabled distinction between this and the other smaller solar farms (of which we have over 20) in this area. There was nothing in the scheme descriptions offered by Sunnica to make it stand out from these other schemes, or to indicate the significance of the proposal.
- 3.1.7. On the front cover of the consultation booklet (Figure 2) there was no indication that the scheme was a large-scale project and NSIP, when most solar energy schemes locally occupy a few fields. As a result, many residents looked at the front cover and no further, not realising the significance of the proposal to them. It was misleading and actively disengaged people from participating further.



FIGURE 2 - COVER OF BOOKLET

- 3.1.8. Feedback presented to Sunnica following their poorly attended non-statutory consultation meetings included the fact that their non-statutory consultation information had been posted out to properties in plain envelopes addressed to "The Resident." At the time of the non-statutory consultation, many people had taken these to be "junk mail"

and they discarded them without reading (as an example: [REDACTED]).

3.1.9. Despite this feedback, Sunnica’s Statutory Consultation booklets were delivered in exactly the same way - plain white envelopes addressed to “The Resident” without any mention of Sunnica or the important content on the outside (including the return address). One resident who lives on Sun Street in Isleham, commented that she had put it straight into the recycling pile as she didn’t realise what it was. Others may well have done the same.

3.2. Confusion about the impact on Isleham

3.2.1. Just over 3 weeks before the start of the Statutory Consultation, the local press coverage was as follows (Figure 3):

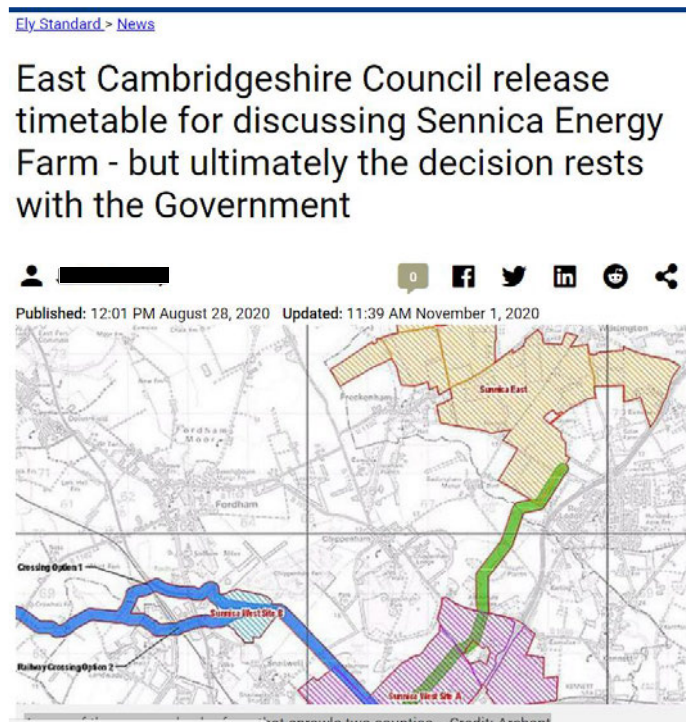


FIGURE 3 - PRESS ARTICLE

3.2.2. The article shows a different scheme boundary to the one proposed by Sunnica in the Statutory Consultation, causing confusion.

3.2.3. In the article, which included quotes from Luke Murray of Sunnica Ltd, it was stated that the scheme area covered 3 sites (yet 4 sites were presented during the Statutory Consultation). It was also stated that, “Villagers such as Isleham, Chippenham and Kennett are mainly affected with a cable route connecting to Burwell Electrical Sub

Station”. The author of the article said that he had taken this information from the Sunnica.co.uk website. For such a significant project it was incumbent on the promoter to ensure that local media was correctly informed and briefed.

- 3.2.4. The scheme map and these statements are inaccurate and misleading.
- 3.2.5. This uncorrected press coverage, combined with the inadequate scheme descriptions presented by Sunnica Ltd, meant that residents in Isleham did not immediately recognise the direct impact that this scheme would have on them when they received their Consultation Booklet a few weeks after this article was published.
- 3.2.6. The land area surrounding Isleham was added late to the scheme (because of the landowner near Freckenham withdrawing from the proposal and being replaced by a landowner from West Row). The revised scheme boundary was not widely publicised nor updated on the Sunnica.co.uk website in a timely manner. The materials in circulation at that time were conflicting and confusing. As such we feel that the Statutory Consultation was prejudiced against the residents of Isleham. The first updated glimpse of the scheme was only presented when the Statutory Consultation began.
- 3.2.7. This issue was highlighted to Sunnica during the early consultation webinars, and it was thought that some additional consultation activity in Isleham might be forthcoming. But nothing happened.
- 3.2.8. A motion that was passed in July 2021 by Cambridge County Council stated that,

“It is disappointing that communities including Isleham were included late in the initial round of consultation, and that COVID restrictions in force at that time limited the nature of the consultation that could be undertaken.”

Note: One of the non-statutory consultation meetings was held at the Beeches community centre in Isleham in 2019. However, this was poorly advertised and poorly attended, and the scheme at the time was sited further away from Isleham so the village was less impacted.

3.3. Poor Consultation Material

- 3.3.1. Residents reported how difficult it was to understand the maps etc in the consultation booklet, which was the primary form of consultation. The printed size was very small, maps were unclear/ difficult to read, no scale or scale bar was provided to assess size. It

was impossible for those trying to measure distances between the scheme boundary and their homes to obtain an informative answer.

- 3.3.2. Many of the maps in the booklet and on the website had no written markings or reference points, so the reader could not establish exactly which area was being shown. Context was lacking. None of the maps had a compass marking North, as is standard practice.
- 3.3.3. The plans on pages 9 and 11 of the booklets (example in Figure 4) are the only plans provided by Sunnica to indicate the proposed solar panel locations. But no settlement names or key features are shown, meaning that any reader would need to be a competent map reader to try to establish how the scheme related to them. The term ‘parameter plan’ is a technical term used in planning and would not communicate any significance to residents. An alternative title may have attracted attention rather than leaving the reader to work out what the plans represented.
- 3.3.4. Similarly, the maps shown in Figure 5 outlining the proposed BESS locations also have no place names or reference points. The BESS locations could be anywhere. Many residents did not realise the impact of the BESS compounds on them as a result.
- 3.3.5. Government guidance¹ on consultations sets out that consultations should use plain English and easy to understand and easy to answer. Lengthy documents should be avoided. The PEIR was a substantial document.
- 3.3.6. Small font size was used in the booklet, making it difficult for visually impaired residents to interpret. Had enlarged maps, with reference points on them, been on display in the village halls, ideally with experts available to help interpret them, these would have been much easier to follow.
- 3.3.7. In a CAG survey, residents were asked how easy it was to visualise the scheme based on the information provided by Sunnica. 67% said that it was difficult. A further 21% said ‘other,’ with reasons ranging from not having received a booklet (most common) or comments about the maps being tiny and difficult to interpret and the booklet containing “random pictures” and lacking important information and details.

1

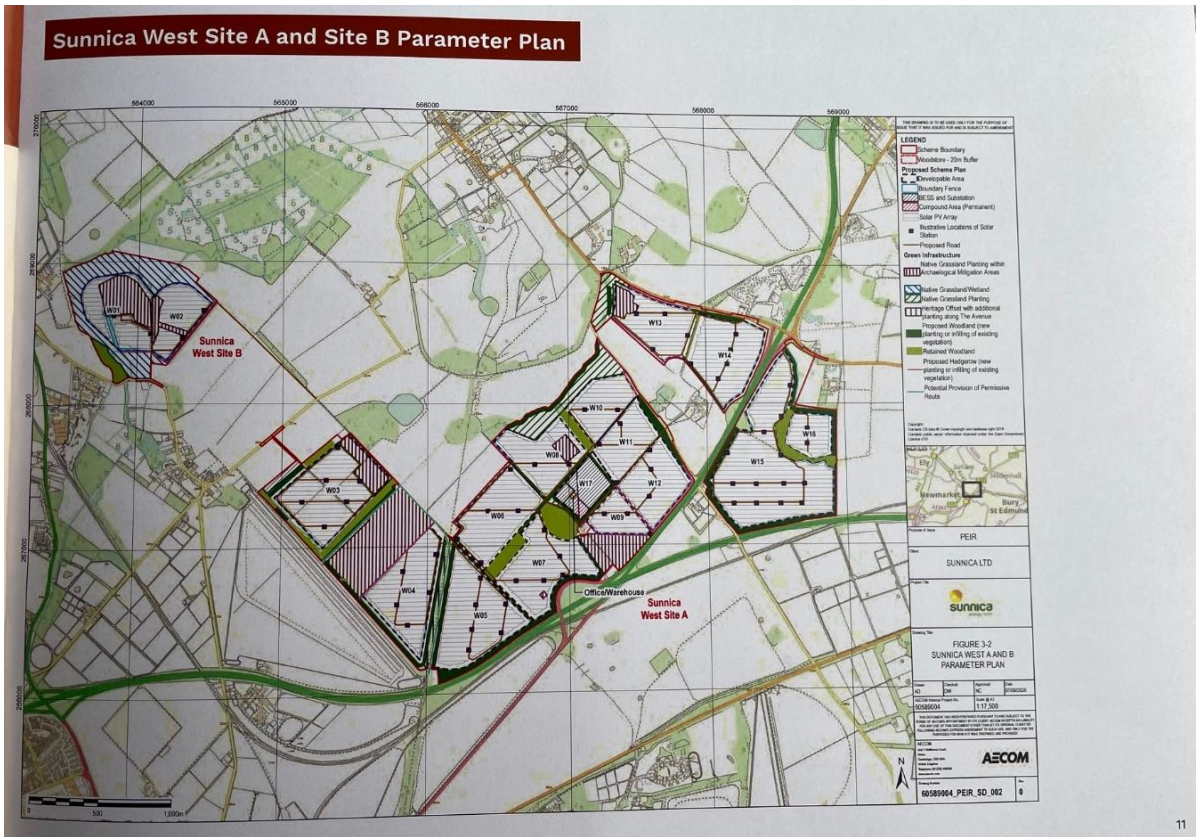


FIGURE 4 - EXAMPLE SITE PLAN

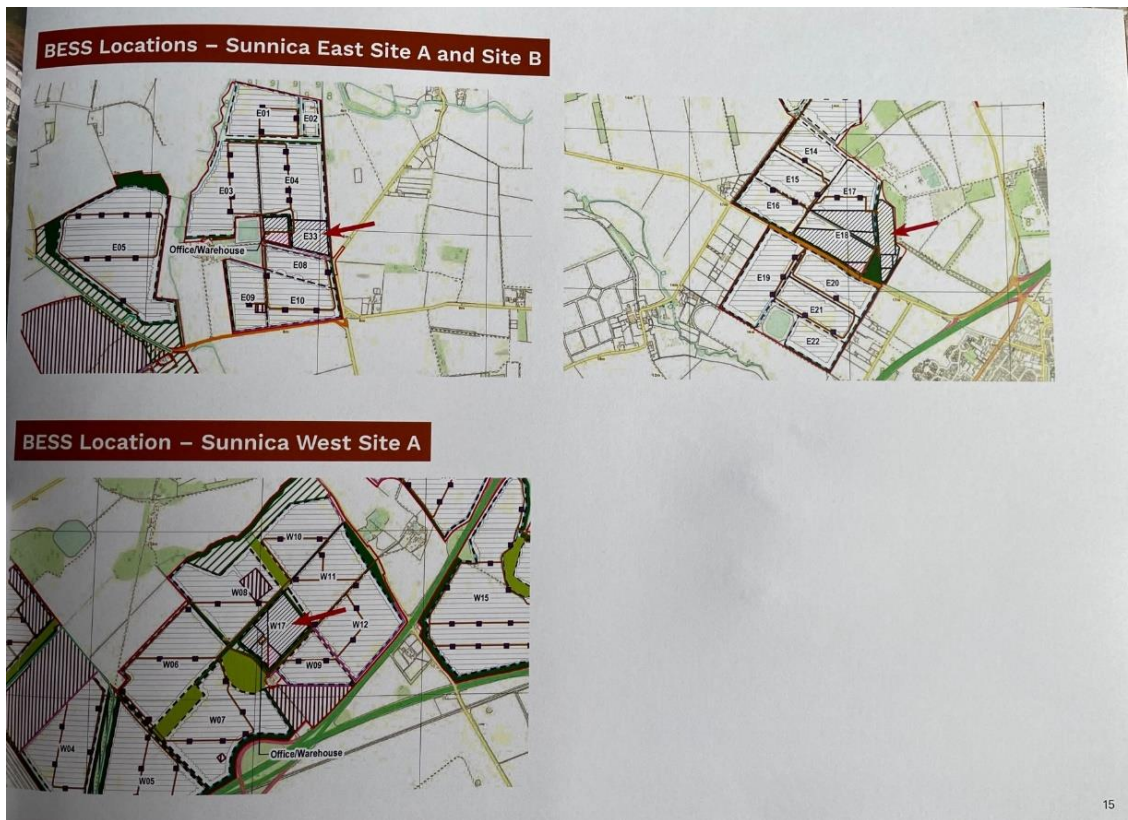


FIGURE 5 - BATTERY STORAGE LOCATIONS

- 3.3.8. Technical terms such as ‘parameter plans’ and ‘red line boundary’ repeatedly used throughout the material provided, but with no explanation as to what these mean. The booklets largely reproduced technical planning drawings and made no effort to use non-technical artwork easier for a lay person to understand. This made the material less accessible and less easy to understand.
- 3.3.9. Sunnica made further changes to the scheme boundary during the Statutory Consultation period and during the second national lockdown (5th Nov-2nd Dec 2020). These revisions were not made clear, causing further confusion about the scheme. Unconfirmed reports of changes to access points, changes/ closures public rights of way, etc spread around the villages. All of this was avoidable had Sunnica communicated more effectively with the parishes.
- 3.3.10. In June/July 2021, over 6 months after the Statutory Consultation had closed, residents of several villages contacted the CAG saying that they had received letters from Sunnica with scant details about potential compulsory purchase or compulsory access to their properties, causing considerable distress and confusion. These people proceeded to contact Sunnica to request additional details and to clarify their plans. In some cases, (e.g. a resident of Isaacson Road in Burwell) they received no reply from Sunnica and had to request their local MP to intervene on their behalf. In other cases, even when a response was received, insufficient detail was provided on which they could realistically feel ‘consulted’ about the impact to their personal property (e.g. ██████ of Chippenham). This is indicative of the lack of awareness of the scheme in the local communities, and the lack of communication and consultation with impacted landowners.
- 3.3.11. Landowners have a right to know the likely extent of compulsory purchase during the consultation, and approximately how much of the land has been secured by Sunnica and what is remaining. This also impacts the way that communities feel about the scheme, how realistic they consider it to be and ultimately how much time they devote to participating in the consultation.
- 3.3.12. Sunnica made multiple changes to the timelines for their application. Residents were told by Sunnica during the Statutory Consultation that they expected to submit their application to PINS in “Spring 2021”. This time passed and May 2021 was proposed. Because Sunnica omitted to keep residents up to date with these submission date changes, the CAG engaged with the local authority planning officers at this time to clarify

when the submission would be. They were told: early July 2021, then early September, then late September, 12th November and finally 18th November 2021.

- 3.3.13. These delays and lack of communication by Sunnica led to much confusion; residents started to assume that the scheme had already been granted approval. For example, in Burwell (one of the largest villages), people saw cables being laid (for other non-Sunnica projects) and work at the substation being carried out, which they assumed was the start of the Sunnica building work. Fields surrounding the other villages had excavators in place and trenches being dug – so people thought that the installation was already underway.
- 3.3.14. The local authorities also pressed Sunnica to engage with communities (e.g. planning officers stating in May 2021, “*We have encouraged Sunnica to update the community in respect of progress with their application preparation and we will continue to press them on this.*”). But this was not acted upon.
- 3.3.15. Eventually, Sunnica released an update leaflet late in August 2021 stating that the application would be submitted in Autumn 2021.
- 3.3.16. This lengthy delay and poor communication on the part of Sunnica has led to misinformation being circulated about the scheme and a feeling that it’s a ‘done deal’ and that residents no longer have a say. With the Covid-19 restrictions easing, Sunnica could easily have held a few update Q and A sessions in the villages to alleviate people’s concerns and ensure they were aware of the revised timings and what the next steps would be.
- 3.3.17. Even as recently as October 2021, Sunnica refused to engage with residents to ease this confusion. Two local MPs, Matt Hancock and Lucy Frazer, held a joint meeting in a local village hall and asked Sunnica to come along to answer questions. They declined. The MPs contacted them a second time, indicating that at least 200 residents were expected at the meeting (around 250 actually turned out), so it would provide an excellent opportunity to answer questions about the scheme. They declined to attend once again (Figure 6).
- 3.3.18. The headline of the article in Figure 6 accurately reflects the way that residents feel they have been treated throughout the entire consultation period, and even afterwards. Matt Hancock, called Sunnica out as being arrogant for not entertaining the idea that they needed to take part in community engagement.



FIGURE 6 - NEWMARKET JOURNAL OCTOBER 2021

- 3.3.19. Confusion about timelines was exacerbated by Sunnica not keeping its website updated with changes. As of November 2021, Sunnica had still not added the revised timelines that were indicated in their update leaflet from late August (i.e. submission in Autumn 2021). It still stated that the submission will be in Summer 2021 (which is contrary to "Spring 2021" shown on pg. 34 of the consultation booklet).
- 3.4. Inaccessible Information, Discriminatory Consultation, 'Missing' Consultees
 - 3.4.1. Consultations on schemes of this size and scale should be made accessible to as many residents as possible. Not all residents in the affected areas received the consultation booklet. Sunnica stated that they had distributed around 11,000 booklets. However, the CAG had to contact Sunnica several times to request additional copies, as did several Parish Councils, to distribute to those missed by Sunnica.
 - 3.4.2. There appears to be a discrepancy with the amount of booklets sent out by Sunnica. Based on census population estimates in Consultation Zone 1 (ca. 30,000), and using ONS average occupancy (2.4 residents per household), it could be expected that more copies should have been distributed. Sunnica claim to have written to 11,048 addresses which doesn't appear sufficient.

- 3.4.3. In a CAG survey of residents in Consultation Zone 1, 40% (229 of the 579 responders) said that they had *not* received a consultation booklet.
- 3.4.4. The SOCC established Consultation Zone 1 as being, “Any person or group likely to have a direct interest in the proposed Sunnica Energy Farm.” Yet this Zone excluded Newmarket and Mildenhall. These are significant population centres, of which a large proportion work in Zone 1 (especially true for the horse racing industry). Many from these towns also have a recreational interest in the area and travel through it routinely. Only in Zone 1 were all addresses written to.
- 3.4.5. The CAG is still being contacted by communities who have only just become aware of the scheme, almost a year after the Statutory Consultation closed. For example, residents of the site owned and permanently occupied by members of the traveller community, who live on Elms Road, adjacent to scheme boundary and the largest BESS site on Sunnica East B. This traveller site is well established (the owners applied for planning permission in 2017, which was granted) and well known in the area. It is impossible not to see the site from Elms Road. This community received no Statutory Consultation booklets and no details about the scheme. According to one district councillor, Sunnica relied on out-of-date records to establish residential areas, which could explain why this land (and other examples) was assumed to be unoccupied.
- 3.4.6. The travelling community has been unable to take part in any consultation at all, despite being significantly affected by the proposal and less than 200m from the BESS compound. They have the same rights as anyone living in a house.
- 3.4.7. The travellers wrote to planning officers on 18th Oct 2021 stating they had not been consulted about the Sunnica scheme. They had recently heard about it from a neighbour. On 5th Nov 2021, Sunnica put a stake in the ground at the end of the drive leading to the site, to which they had pinned a letter and a consultation booklet. They did not walk up the drive to meet with the community or to provide an outline of their plans. There was no time for meaningful consultation before the application was submitted on 18th November 2021.
- 3.4.8. We are aware of other public consultations in this region where there have been sites occupied by the traveller community. In these cases, developers wrote to each caravan plot number. Sunnica did not do this.

- 3.4.9. Another resident along Elms Road in Freckenham also contacted us stating that their home had been mistakenly classified by Sunnica as uninhabited/ unoccupied.
- 3.4.10. The Shores Trust, a local charity owning land impacted by the scheme, were also not properly consulted. Sunnica had been notified of the charity's address and ownership of the land by the board of Trustees. Instead of writing to their registered address, Sunnica, pinned a consultation letter the gate of their land outlining their interest in the land. The charity found this by chance and wrote to Sunnica, re-iterating that they had already provided Sunnica with their address and, in future, please could they write to them at that address instead of pinning notices to gate posts. Following this exchange, Sunnica did write to them at their registered address but still omitted to provide sufficient detail about their plans on which they could realistically be consulted.
- 3.4.11. Many people subject to this late round of consultation where alterations to highways and junctions for construction access were proposed, received only a small-scale plan showing the revised red line boundary. It was necessary to compare these with previous plans in the brochure to see the sometimes very small difference, but then be left not knowing what the difference was for. In some cases land was required for these changes.
- 3.4.12. Sunnica Ltd should have carried out research regarding the populations of the villages in their 'Consultation Zone 1'. This would have enabled them to recognise that a significant proportion are senior citizens (e.g. approx. 29% in Isleham, 27% in Worlington, 24% in Freckenham etc. *Source ONS*). A large proportion of these senior citizens either do not have access to a computer, or they are not very computer literate so were unable to access the online information or webinars. Indeed, in some areas around Isleham, there is currently no internet connection at all, so these residents were also unable to access the online information. The Covid-19 pandemic highlighted that there are many families here who do not have laptops/ computers (shown by the difficulties accessing home school work during the lockdowns). This is discriminatory against part of the population.
- 3.4.13. The CAG survey showed that 51% of residents were not aware of the additional information online or that they could not access it.

3.4.14. The Consultation Institute – Consultation Charter² sets out Best Practice for consultation. Among the seven core principles is “*Consultees must be able to have reasonable access to the exercise. This means that the methods chosen must be appropriate for the intended audience and that effective means are used to cater for the special needs of ‘seldom heard’ groups and others with special requirements*”. Also “*New technology and social media offers an ever-wider choice of consultation mechanism, but consultors must always ensure that the ‘Digital Divide’ does not disenfranchise citizens or stakeholders*”.

3.4.15. In view of this, the Sunnica Statutory Consultation booklet should have been supported not just by online information, but also by physical displays in the parishes (e.g. mobile displays or fixed displays in the village halls with enlarged maps etc), as indicated in PINS Guidance on procedural requirements for major infrastructure projects:

“Applicants should engage proactively with local authorities and local communities to find alternative means to provide access to the documentation where required, to ensure on-going fair participation in the planning process, for example by providing copies of documents on a USB flash drive where parties have access to a computer but have limited or no internet access or, where reasonably practicable, by making copies of documents available for inspection free of charge where a person is unable to access the documentation electronically or finds it difficult to do so.”

3.4.16. In-person meetings were possible in a Covid-secure manner during the first 6-7 weeks of the Statutory Consultation period, as evidenced by the farmers markets in Freckenham and Isleham, village neighbourhood plan consultations, etc. There are numerous large halls in community centres, sports hall etc in this area, so plenty of opportunity for ‘ticketed’ events with adequate social distancing could have been achieved. Or even outdoor events in the earlier weeks of the statutory consultation period.

3.4.17. Sunnica did not come to the villages at all during the Statutory Consultation, unjustly citing Covid-19 restrictions as the reason for this choice. Not only did the lack of any

² [REDACTED]

physical meetings exclude members of the public who would have engaged with a physical consultation, but it also exacerbated the confusion surrounding the proposal.

3.4.18. Prior to the start of the Statutory Consultation period, district and county councillors asked Sunnica to come to the villages to answer questions, but they declined (Figure 7). Residents asked Sunnica several times during the consultation webinars to come to the villages, but they declined this too.

3.4.19. Comments made by Suffolk councillors during the Statutory Consultation period included, *“At this stage of the process we have many questions to which the answers are not entirely clear”* (Figure 8) and that *“impacts on highways and transport need to be evidenced more clearly.”* Residents and other key stakeholders cannot be expected to be consulted on impacts during construction and operation etc if there is so little information forthcoming.



FIGURE 7 - ARTICLE ON SUNNICA NOT COMMUNICATING

3.4.20. Despite MPs, residents and local councillors asking Sunnica to come to the affected areas to talk to communities, they declined (Figure 8 and Figure 9)

3.4.21. This gave the impression that Sunnica felt they could inflict a scheme of this size and scale on local communities without adequately engaging with them. One district councillor

criticised *“the ‘cynical premise’ of Sunnica who, he felt, might not feel the need to consult locally since the decision was not being taken locally.”*

3.4.22. Not only has this caused much anger and upset, but it also set a prejudice in the villages that it was not worth participating in the consultation as their voice would not be heard.

3.4.23. Local MP, Matt Hancock, commented, *“We should make the case about not enough consultation having been done, notwithstanding whether you think this is a good idea or not.”*

“This will not be the case for residents of Worlington and Freckenham who have said that although they are not opposed to solar power they do not want to live inside a power plant.”

Councillor Rachel Hood added: “On behalf of West Suffolk residents I do want to highlight that the size of this proposal is monstrous.

“2,750-plus acres is completely inappropriate and the amount of solar energy that will be provided is a fraction of what would be provided if it was in a more suitable place, i.e. not in the middle of Suffolk that doesn’t get that much sunlight.”

The councils’ responses have called for more information on the impact it will have on climate change emissions, archaeological investigations required, mitigation for wildlife species, flood considerations and visual impact.

The responses said that the “assessment of impacts on the economy is flawed” while the “impacts on highways and transport must be evidenced more clearly”.

Suffolk County Council cabinet member for the environment, Richard Rout, said: “At this stage of the process we have many questions to which the answers are not entirely clear, so it’s appropriate at this stage to take these issues to the developer.”

He added: “The sheer scale of the project means its impact will be significant and very far-reaching.

[MORE: Villagers prepare to fight solar farm plans](#)“It’s our view that the largest solar project in the UK should take an exemplary approach to mitigating its impact on the landscape, so much more work is necessary.”

As a nationally-significant energy project, the government will make the final decision, with the development consent order expected to be submitted to the Planning Inspectorate from spring next year.

FIGURE 8 - EADT 11 NOVEMBER 2020

Growing concern from residents consultation about massive solar scheme set to surround villages just outside Newmarket is not good enough

By Dan Barker - dan.barker@liffepublishing.co.uk

Published: 05:00, 29 November 2020

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There is growing concern from residents that a consultation into a 2,800 acre solar farm which will surround villages just outside **Newmarket** is not good enough.

Under controversial proposals from Sunnica, the sprawling facility will cross both East Cambridgeshire and West **Suffolk** and stretch from a substation in Burwell to Snailwell, Newmarket, Freckenham, Worlington and Isleham.

And now West Suffolk MP Matt Hancock, whose rural constituency will be changed for the next four decades if the plans are approved by his government, has told worried residents in an online meeting that if the proposals don't change, it should be opposed.

FIGURE 9 NEWMARKET JOURNAL 29TH NOV 2020

- 3.4.24. Another district councillor stated that Sunnica had not had any discussion with 3 of the Parish Councils in their ward (and within 'Consultation Zone 1') in the lead up to the statutory consultation, which contradicts claims by Sunnica in the SoCC (Figure 11 and 11) that Parish and Town Councils in Consultation Zone 1 would be engaged.

The ways in which our early engagement has influenced our approach to consultation include:

- Ensuring consultation activity includes Snailwell and Kennett
- Targeted advertising through the local press including adverts in the Ely Standard and East Anglian Daily Times
- Engagement with parish and town councils in the vicinity of the proposed Sunnica Energy Farm between periods of consultation
- Consulting with groups that have a particular interest in public rights of way such as The Ramblers and bridleways groups

FIGURE 10 SoCC ENGAGEMENT WITH PARISH AND TOWN COUNCILS

Table 3: consultation publicity and techniques

Zone	How we will publicise consultation within this zone	How we will consult within this zone
1	<ul style="list-style-type: none"> • Writing to all addresses within consultation zone 1 • Writing to elected representatives, <u>parish</u> councils and community groups within the zone with details of the consultation • Sharing a consultation information pack designed to support stakeholders promoting consultation through their own existing communication channels such as social media feeds with local authorities, parish councils and community groups within the zone • Publicising the consultation in the following newspapers circulating in the consultation zone: the Newmarket Journal, the Cambridge News, Bury Free Press, the Ely Standard and the East Anglian Daily Times. • Publicising the consultation via regional and local broadcasters including BBC Radio Cambridgeshire, BBC Suffolk, BBC Look East • Advertising the consultation on social media • Publishing details of the consultation online at www.sunnica.co.uk 	<ul style="list-style-type: none"> • Sending a copy of a consultation booklet providing a non-technical overview of the proposed Sunnica Energy Farm, the BA process, the consultation and planning process, how to take part in the consultation, and proposed next steps to all addresses in consultation zone 1. • Inviting enquiries and responses online through the consultation website, by freephone, freepost or email. This will provide a variety of means for consultees to respond in a way convenient to them. • Hosting a virtual public exhibition on the consultation website. • Hosting webinars which will include a presentation regarding the proposals and an opportunity to ask questions. • Inviting elected representatives to take part in briefings through a digital meeting. • Inviting residents of consultation zone 1 to book an individual

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FIGURE 11 SOCC LIST OF WHO WILL BE CONTACTED BY SUNNICA

- 3.4.25. Nicholas Wright a Parish Councillor for Chippenham confirms that his parish council did not have any specific approach by Sunnica to discuss any part of the scheme before, during or after the consultation period. Sunnica relied entirely on their brochures and website and did not meet with key stakeholders even virtually.
- 3.4.26. One further organisation, the Ark Church, based to the Southeast of Isleham, were not consulted. Neither as an organisation or members individually (congregation of around 400 people). The Ark Church is less than 400m from the proposed development and is a prominent building of architectural significance, in a setting significantly impacted by the development.
- 3.4.27. The Preliminary Environmental Impact Report (PEIR) was an essential part of the consultation since it contained more details about the proposal (the Consultation Booklet only gave a superficial overview of the scheme and, as such, did not enable people to assess the impact that it would have on them). The PEIR is listed in the SoCC as one of the items that Sunnica will be requesting views on (Figure 12). However, it was not made readily available to all.
- 3.4.28. Only those who were able to access the online consultation information were able to view the PEIR. Alternatively, those that could afford to pay over £315 to obtain a personal

copy (Sunnica asked for 35p per sheet; it's a 900+ page PEIR document). The charge was an obstruction to effective consultation as material that was deemed necessary by Sunnica to understand the proposals could only be obtained by paying for it.

- 3.4.29. Based on the population distributions of the affected parishes, this meant that around a quarter to a third of residents were unable to give their views on the PEIR, simply because it was inaccessible for those less computer literate or without computer access.

What will be consulted on?

During the statutory consultation, we will be asking for views on:

- The proposed Sunnica Energy Farm
- The short term and long term impacts of the proposed Sunnica Energy Farm including:
 - Construction impacts
 - Environmental impacts
 - Operational impacts
 - Impacts from decommissioning
- The PEIR

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FIGURE 12 - PEIR LISTED IN SOCC FOR CONSULTATION

- 3.4.30. Recognising this omission, the Parish Councils requested that Sunnica provide hard copies of the PEIR to be made available in the villages. Sunnica were also asked to do this several times by residents during the early consultation webinars. This would have been a reasonable compromise to assist with effective consultation.
- 3.4.31. Sunnica responded slowly, first commenting in webinars that they would “look into” providing hard copies in villages and then indicating that they would supply them to the Parish Councils. By this time, several weeks of the Statutory Consultation period had elapsed.
- 3.4.32. Further confusion resulted in Parish Councils having to formally ask for PEIR copies, in addition to their previous requests during webinars. Three of these Parish Councils formally requested a hard copy of the PEIR by email and they received it. One further Parish Council requested a copy and sent several email reminders to Sunnica – they eventually received a copy in December just before the consultation closed. Two further Parish Councils that requested a copy did not receive anything. Other Parish Councils had assumed, based on Sunnica’s confusing comments during the webinars, that a copy of the PEIR would be sent to all Parish Councils in Consultation Zone 1, but this was not the case and they did not receive it.

- 3.4.33. In addition, where Sunnica did supply a hard copy of the PEIR, it was not a full version - just the main body of the document minus the appendices, which contained important details about the scheme. Government guidance is clear: relevant documents must be provided on request. The Appendices are relevant documents and they were not provided on request.
- 3.4.34. Given that the PEIR was (by Sunnica's own admission) such a vital part of the consultation it should have been made available, in full, in all towns and villages from the very outset of the Statutory Consultation period.
- 3.4.35. The inaccessibility of the PEIR was also reflected in a CAG survey. When asked, "*Were you able to access the information in the PEIR (preliminary environmental information report)?*", 91% of the 556 responses stated that they were unaware of the PEIR or unable access it. An extraordinarily high proportion of people were unaware of or unable to access key documentation. They have not complied with the SoCC.

3.5. Ineffectiveness of Webinars

- 3.5.1. The Sunnica online webinars were poorly advertised, and thus poorly attended. They were noted in small print on the back of the consultation booklet and in a small number of newspaper adverts (Figure 13). The newspapers chosen for advertising these were not always in the local area and are not so widely read by the local population here. In the modern age advertisements in newspapers, although required by law, are ineffective due to declining print readership. Other channels should have been used to advertise, not just the minimum required by law.
- 3.5.2. In a survey (Appendix 1) only 5% of respondents considered the webinars an adequate replacement of physical meetings and exhibitions. Some 60% of those surveyed did not attend the webinars.
- 3.5.3. No advertisements were placed on local village Facebook groups or in local village magazines, which are much more widely read and followed. A CAG survey indicated that 65% of 562 responders were unaware of the webinars. Social media users are highly likely to engage with online content, and the opportunity was lost to mobilise this group of the population.

- 3.5.4. Residents had to have access to a computer or device to register and, of course, listen to them. Previous comments in this report show that a significant proportion of residents here did not have these facilities and so were excluded from the webinars. Given that the webinars were to replace the dialogue that would normally take place in person, this gap was not effectively filled.
- 3.5.5. During the first series of 6 webinars, between 12-21 people joined. This is in stark contrast to the attendees of video conferences held by councillors and MPs during the statutory consultation period (over 100 attendees), and with the joint meeting by MPs Lucy Frazer and Matt Hancock in October 2021, when the village hall was packed with over 250 residents (more had expressed interest in going had it not been held during the working day). The overwhelming majority of residents here feel passionately about the impacts of this scheme on them, and this was not reflected at all in the webinar attendance.



FIGURE 13 - NEWSPAPER ADVERTISEMENT IN BURY FREE PRESS

- 3.5.6. Figure 13 shows an advert in the Bury Free Press. Bury St Edmunds is around 15-20 miles away from the scheme area, so adverts placed in this paper were not especially relevant to the affected communities.

- 3.5.7. The Statutory Consultation started on 22nd Sept 2020 but the first webinar did not take place until 1st October, over 1 week into the consultation period. This was followed by 5 further webinars between 3rd and 17th October. This first series of 6 webinars was then repeated.
- 3.5.8. During this timeframe, and up to 5th November 2021 (when the 2nd national lockdown came into effect), there was still the option of having face-to-face discussions in the villages, but Sunnica chose the webinars as their preferred way to consult.
- 3.5.9. Residents expected that the webinars would enable a two-way dialogue between Sunnica and the attendees. It was accepted that during such unprecedented circumstances, Zoom meetings and other video conferences provided a means of having a discussion. Unfortunately, Sunnica did not hold the webinars as a video conference. The format was complicated, comprising a presentation, followed by a Q&A session which was not 'live' in the sense that questions could not be asked directly to the presenters and receive a direct answer. Instead, questions had to be submitted in advance of the webinars or submitted via the 'chat' function during the webinar. A mediator collated the questions, in some cases grouping them together or paraphrasing incorrectly, so residents were unable to ask their questions directly. This prevented any dialogue or correction where the question was misunderstood or misrepresented.
- 3.5.10. Often, attendees waited to the end of the webinar (sometimes over 2 hours) to hear their question being addressed, only to find that their query was misinterpreted or insufficiently answered, but there was no opportunity to seek further clarification. Residents left the webinars feeling frustrated, and with far more questions than answers. They were ineffective.
- 3.5.11. Analysis of the three Q&A webinars showed that only 55% of the questions received a direct answer (Appendix 3). And of those questions that were answered, a large proportion of the response were inadequate or irrelevant.
- 3.5.12. Because there was no opportunity to engage in 'virtual conversation' with this complicated format, some attendees asked Sunnica if they could change the format to operate webinars as a two-way live video conference to improve the level of communication. This was important, as often one person's question can trigger other questions from other attendees and there is a better flow of information and engagement, leading to more comprehensive answers being obtained.

- 3.5.13. Sunnica declined this, saying that a more ‘open’ format of virtual meeting was not possible due to GDPR and persevered with their frustrating and flawed format. They seemed to be deliberately trying to disengage residents, and some that attended one webinar felt so frustrated that they didn’t attend others.
- 3.5.14. This GDPR statement is not true – two webinars were held locally in November 2020 for a local major transport scheme public consultation where participants could ask questions verbally and there was a two-way dialogue. Data protection requirements were upheld using this format.
- 3.5.15. In addition, many of the councils, local MPs, etc held meetings during the Sunnica consultation period using Zoom or other video conferencing software, and there was never any issue with GDPR since it is easy for people to log in anonymously should they prefer to do so. These were also well attended (over 100 people), compared to the poor attendance of the Sunnica webinars.
- 3.5.16. It could be expected during a consultation period that the number of webinar participants would increase as more residents became aware of the consultation. This was not the case with the Sunnica Statutory Consultation, in part due to the flawed format that Sunnica chose to pursue.
- 3.5.17. Attendance at the webinars as observed by the CAG is shown in the table below (note that many attendees were CAG members. The numbers include repeat attendees):

Time	Date	Topic	Attendees
18:00	01/10/2020	Introduction	12
14:00	03/10/2020	Sunnica East	21
18:00	08/10/2020	Sunnica West	14
14:00	10/10/2020	Grid Connection	13
18:00	15/10/2020	Environmental	18
14:00	17/10/2020	Construction	12
14:00	24/10/2020	Introduction	2
18:00	29/10/2020	Sunnica East	6
14:00	21/10/2020	Sunnica West	No Data
18:00	05/11/2020	Grid Connection	No Data
14:00	07/11/2020	Environmental	3
18:00	12/11/2020	Construction	No Data
19:00 - 20:00	18/11/2020	Q&A 1	26
19:00 - 20:00	25/11/2020	Q&A 2	44 (Peak)
19:00 - 20:00	02/12/2020	Q&A 3	No Data

- 3.5.18. The sequence of webinars was repeated but without changing the time, such that the 18:00 webinar on 08/10/2020 on Sunnica East would, for example, run at 14:00 (instead of 18:00) on 29/10/2020 to catch people who might not have been able to see it the first time.
- 3.5.19. Residents' time was wasted during the webinars, which were categorised into different topics. The first introductory portion (approx. 20 mins) of each webinar was repeated on each session, so attendees had to sit through the same presentation multiple times before getting to the part they were interested in. This led to frustration at not being able to get to the information they wanted to assess the impact. This 'standard introduction' could have simply been pre-recorded and made available, allowing more time for the specific topic matter to be discussed and, importantly, the Q&A.
- 3.5.20. Splitting the webinars into subjects resulted in reduced consultation time. Those wishing to hear more on a given topic had to wait until the necessary presentation before they could obtain further information about this. And if they weren't available to attend the webinar on the date on which their topic of interest had been scheduled, they had to wait for the recording to be uploaded before they could listen. But this meant that they were unable to ask questions as it was no longer live.
- 3.5.21. Additionally, the webinar recordings took an unnecessarily long time (sometimes over 2 weeks) to upload to the Sunnica website. The sound quality was also poor in some cases. One of the webinars had a technical fault, so only a partial recording was available.
- 3.5.22. The presentations on the various topics could have been pre-recorded and made available from the outset of the consultation period. The format chosen by Sunnica did not allow maximum time for residents to engage with the consultation, nor to listen to the topics at their convenience and formulate questions, which Sunnica could then have responded to in a simple two-way Q&A video conference.
- 3.5.23. The whole webinar process maximised frustration, restricted access to subject matter, and provided confusing and contradictory information to that presented in the written materials.
- 3.5.24. Attendees asked questions that were pertinent to the proposals. These were about sourcing of the PV panels and raw materials, and about use of local labour in construction. These questions were not answered as Sunnica deemed them to be the responsibility of

an un-named funder. But Sunnica Ltd are the developer, they are the applicant for the DCO, and upon whom obligations in the DCO are binding. Webinar attendees concluded that Sunnica were not interested in obligations and were simply fronting an unknown third party who was the actual decision maker.

3.6. Missing, Misleading and Conflicting Information

3.6.1. The online consultation material was confusing and lacking in detail in areas. 41% of residents who responded to a CAG survey found it difficult to navigate. Comments about the virtual information included:

- insufficient detail provided about the scheme
- difficulty trying to toggle between webpages to pull information together
- insufficient details on maps etc to assess the exact locations, no markings or reference points on some of the maps, so it was difficult to see where the locations were meant to be
- no search function meaning that the viewer had to know what they were looking for to find it.
- no overall summary or FAQ style area directing residents to the areas of the website that might help them navigate better, no cross referencing to help users make connections between maps on different pages etc

3.6.2. The online format was not readily accessible to less confident computer users and, as such, was excluded a large portion of the local communities.

3.6.3. Visualisations of the scheme were not available in the consultation booklet or online at the outset.

3.6.4. Sunnica were asked by residents several times about providing visualisations. They were reluctant to provide these at intervals other than after 1 and after 15 years. Residents felt that more were necessary to enable them to visualise the impact of the scheme over the course of the first 15 years. Sunnica stated that they were just conforming to industry practice, so they only had to provide the minimum required.

- 3.6.5. After further requests for visualisations from webinar attendees, Sunnica eventually placed visualisations of the scheme on the website only. No additional examples were provided using other formats to accommodate those without access to the website.
- 3.6.6. Those that were eventually provided were very difficult to interpret. Figure 14 shows a “View west from PRoW (footpath) W-257/002/X – Type 4 visualtion Year 15”.
- 3.6.7. To establish where this is, the user needs to try to find another map somewhere on the website (no cross referencing was provided), and then try to find PRoW number W-257/002/X and then toggle back to this photo to try and see where it is and what it might look like in 15 years’ time. This is not presented in a non-technical format.
- 3.6.8. This is incredibly confusing and time consuming and does not readily allow people to visualise how the scheme might appear. This is a key part of being able to assess the impact on them.



FIGURE 14 - EXAMPLE OF CONFUSING PHOTOMONTAGE

- 3.6.9. The visual impact map on pg. 24 of the consultation booklet is “modelled on substation heights of max 8.5 m.” But it is not clear which substations these are. It is not clear if this refers to the BESS units (which on pg. 14 are said to be 6m high), or the Burwell substation expansion or the solar stations – but in the PEIR this height is given as 12m.
- 3.6.10. There is also reference to 10m high “electrical compounds” (Figure 15) but again it is not clear what these are.

3.6.11. This confusing information prevents a true assessment of the visual impact of the scheme during construction/operation. These are significant structures, so warrant careful explanation of what they are, where they will be and how they will most likely look.

Sunnica Energy Farm
Preliminary Environmental Information Report
Volume 1: Main Report (Chapter 10: Landscape and Visual Amenity)

- The solar arrays would be set within an aluminium frame and mounted on a steel rack. The panels would be angled with their highest edge 2.5m above ground level and all panels would be fixed in a south facing orientation and would not rotate to follow the sun;
- The invertors, switchgear and transformers would also be 3m in height and the solar stations would be 3.5m in height;
- The battery energy storage system ('BESS') would be 6m in height;
- The electrical compound would include substations which are 10m in height (with Burwell Sub-station extension at 12m) and control buildings which are 6m in height;
- The proposed landscape design would consist of a native grassland beneath the panels and in areas of ecological enhancement or archaeological mitigation. This grassland would not have fully established at year 1.
- Proposed new native hedgerows would be between 0.6m and 0.8m in height with tree planting between 1m and 3.5m in height dependant on available plants and natural variation in heights;
- All new planting (the 'Green Infrastructure') as per the preliminary the Parameter Plans would be implemented and managed in accordance with the Outline Landscape Ecology Management Plan ('OLEMP'), a draft version of which is included within **PEI Report Volume 2: Appendix 40**.

FIGURE 15 - EXTRACT FROM CHAPTER 10 OF PEIR

3.6.12. A considerable amount of information was either not provided, or left unanswered, during and after the Sunnica consultation. Many of these points were outlined in the joint response by the 4 local authorities affected by the scheme – a 79 page document detailing well over 500 items of missing details (see link to the full report under Section 4, 'References'). This includes fundamental information that allows residents to assess the impact of the scheme on them during construction and operation e.g.:

- Not marking existing solar farms on the consultation maps, making 'cumulative impact' impossible to assess.
- Not declaring the approximate number of solar panels until pressed to do so by multiple residents' questions during the consultation, and then only indicating that there could be around 1.1 million solar panels to the 14 residents who listened to the webinar in which this was discussed (3rd Webinar 8/10/2020). This is a vast number of solar panels. These kinds of estimates must be made available to all consultation participants to allow them to appreciate the scale of this scheme. The panels arguably have the broadest impact and cannot be excluded from the consultation.

- Not providing any indication about the impact of the loss of ca. 2500 acres of highly productive vegetable growing land for at least 40 years, and how this shortfall in local food production could be made up. Nor did Sunnica provide adequate information about how this will affect the local agriculture-related economy; which is key to this area. When questioned about this during webinars, Sunnica simply replied by saying, *“We will need to find other land to farm.”* This is not an adequate answer to loss of such a large amount of highly productive farmland. This lack of information does not allow the residents here to assess the impact of the scheme during operation and how losses will be compensated.
- Sunnica also incorrectly stated in the PEIR that the land in this area is predominantly grade 3b and 4, which residents (many of whom have worked in agriculture in this area for years) know not to be true (see Appendix 2 – Sunnica site with ALC grading). There are large areas of grade 2 land, which are not mentioned by Sunnica.
- Sunnica did not explain how or why they have ‘downgraded’ the land. They also omitted to inform residents that the land is irrigated and capable of growing a wide range of vegetable crops (which would not be consistent with grade 3b and 4 land). Consultees reading this were misled about the quality of the soil, and their opinions and expectations of the agricultural potential of the land would have been incorrect.
- When asked by residents and local authority planning officers to provide evidence of their soil classification, Sunnica declined. Sunnica eventually disclosed the data on their agricultural assessments to local authorities in August 2021 after repeated requests, but not to local residents. This is not the spirit of consultation– not with local residents nor with local authorities.
- Not declaring information about disruption/ damage to roads/ footpaths/ bridle ways or construction noise/ pollution. Residents of Burwell who live near a newly constructed solar farm on Factory Road described the construction noise from continual piling and drilling as unbearable, and that it had prevented them from being able to be outdoors for several months. According to Sunnica’s booklet, they do not anticipate *“any significant noise effects from construction,*

operation or decommissioning.” This is highly unlikely and contradictory to local experience, and warrants further engagement to clarify.

- No details at all regarding other sites that were considered for the scheme and why the proposed area was chosen to be more suitable above these. This would have enabled a better understanding of why the scheme needs to be designed as it is, and in the area it is. MPs also wrote to request more information about alternative sites, but Sunnica chose not to divulge this, simply providing an overview of the process they had followed but not specifying alternative sites that were considered as part of this process.
- No details about how the anticipated output/ efficiency of the proposed scheme compares with other technologies so that people could establish the value of the Sunnica proposal to compare with the impact it will have on them.

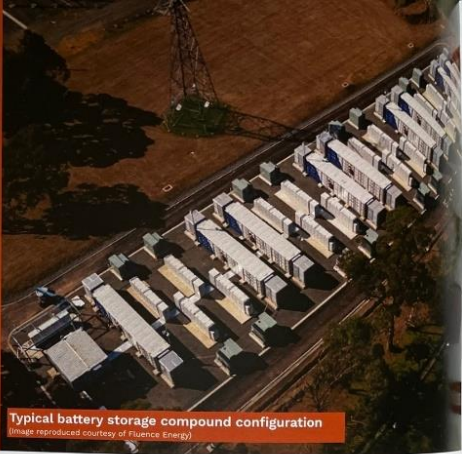
3.6.13. Sunnica did not willingly cooperate during the consultation or put themselves in a more favourable light with residents/councillors/MPs/planning departments etc during this process.

3.6.14. Details regarding BESS were particularly scant, which did not allow residents to understand the implications that the BESS storage compounds would have on them.

- Sunnica did not declare the likely battery technology, so did not allow residents to gauge battery safety, a crucial part of the impact during construction and operation given the known fire hazards of commonly used BESS technology (e.g. Li-ion). They did not declare the expected electrical capacity of the BESS to permit a rough idea of the scale of the operation.
- Not declaring the approximate number of battery energy storage containers and the approximate dimensions of these. Misleading images were depicted in the brochure of battery sites showing just 9 containers (Figure 16). However, the CAG estimates that there will be around 100 containers of batteries on *each* of the potential 3 sites. An image showing a battery compound with 10x more containers than the chosen image would have been more realistic. No visualisations of the BESS sites or substation expansion were provided. In addition, the aerial view of a the smaller facility in Figure 16 does not help the reader to assess the impact from ground level. These are some of the largest and tallest structures in the scheme and will have the most widespread visual impact. Residents did not feel consulted on the BESS aspect of the proposal at all.

Battery storage

During the non-statutory consultation, we asked for views on whether the Battery Energy Storage Systems (BESS) should be concentrated in specific locations or spread across different locations across all the sites.



Typical battery storage compound configuration
(Image reproduced courtesy of Fluence Energy)

A majority of people who responded to the consultation said that the BESS should be concentrated. A number of responses also emphasised that the BESS should be located away from homes and well screened.

We are now proposing that the BESS is concentrated at three locations marked on the plans on pages 9, 11 and 15. These are:

- Sunnica East Site A – within the area marked **E33**
- Sunnica East Site B – within the area marked **E18**
- Sunnica West Site A – within the area marked **W17**

Each will consist of containers that will house the batteries. The containers will be a maximum of 6m in height. Images with the indicative appearance of these containers are shown here.

Locating the BESS together means we are better able to screen them from the outside. We have looked to locate the BESS away from homes, select appropriate colours, and screen them with planting.

We were asked at our public exhibitions last year about how safe the BESS would be particularly with regards to fire risk. We take the risk of a potential fire very seriously. Each container would be isolated and would contain an automatic fire control system. If approved, the Scheme would be subject to a Battery Fire Safety Plan.

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FIGURE 16 - IMAGE OF 'TYPICAL' BATTERY COMPOUND

3.6.15. Misleading and conflicting information about the purpose of the BESS. They were portrayed in the non-statutory consultation materials as being for the storage of the energy derived from the Sunnica solar panels (Figure 17).

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



The diagram illustrates two configurations for a battery energy storage system:

- Distributed battery energy storage system:** Shows a PV plant connected to a solar inverter (PCS). The output goes to a power plant controller (PPC) which manages multiple battery energy storage systems (BESS) and battery inverters (PCS). The system is connected to an HV substation via an HV solution transformer and switchgear.
- Centrally located battery energy storage system:** Shows a PV plant connected to a solar inverter (PCS). The output goes to a DC/DC controller, which then feeds into a power plant controller (PPC) that manages a single centrally located BESS and battery inverter (PCS). The system is connected to an HV substation via an HV solution transformer and switchgear.

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FIGURE 17 - BESS INFORMATION IN NON-STATUTORY CONSULTATION BROCHURE

- 3.6.16. However, a different use of the BESS was described by Sunnica during one of the late statutory consultation webinar Q&A sessions (18th Nov 2020, attended by 26 people). In this webinar they described how the BESS were to be used for energy trading and explained that this entailed drawing energy from the Grid (energy from all fuel types – solar, wind, and even fossil fuels, etc.) when there is a surplus and then selling it back to the Grid at a higher price when demand is higher.
- 3.6.17. This was not clear in the public consultation booklet or website; indeed, it was not stated exactly what the BESS were for (Figure 18). The way the information was presented in the booklet, adjacent to a section on PV technology, meant that any reader might reasonably conclude that they were simply part of a solar generation facility. But it seems this may not be the case. This is a significant omission. It changes the nature of the entire scheme and requires full consultation so that all residents are aware of this potential additional use of the BESS (not just the 26 people who attended the webinar).



FIGURE 18 - BESS IN STATUTORY CONSULTATION BOOKLET

- 3.6.18. This prejudices those who would only consent to the BESS for the purpose of storing the Sunnica solar energy to smooth out demand/supply but would not accept BESS as part of a fossil and other energy trading scheme. It implies that the BESS is an integral and necessary component of solar energy generation, when in fact it is not. Given knowledge of the size of the BESS compounds, their imposing size, and that they are to some extent a separate scheme, the response to consultation may have been different.

- 3.6.19. An energy trading operation is a separate enterprise and should be indicated as such. It is very different to the 'usual' solar farms that operate in this area (which do not have large scale BESS).
- 3.6.20. If the Sunnica proposal is truly intended as an energy trading facility, residents have been denied consultation on this significant additional aspect of the scheme and this needs to be corrected.
- 3.6.21. Sunnica also implied that they had acted on views from the non-statutory consultation regarding the BESS – that they were concentrated and sited away from peoples' homes (Figure 19). This has not happened. The proposed BESS locations described in the Statutory Consultation material are very close to peoples' homes. This is misleading.

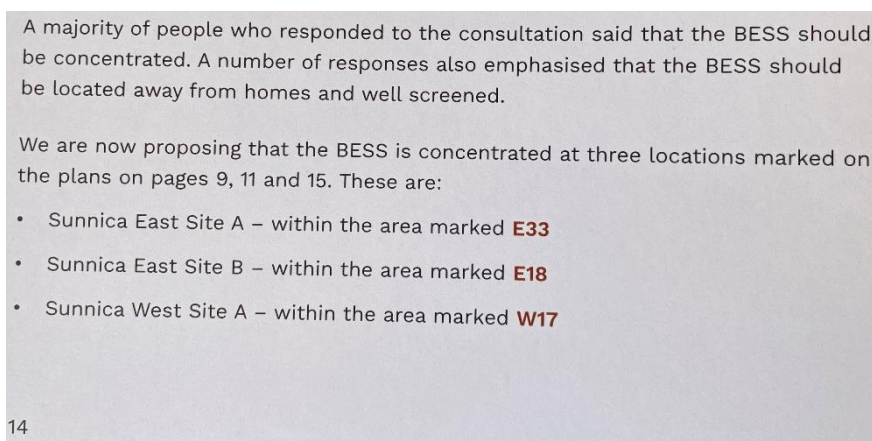


FIGURE 19 - DESCRIPTION OF BESS LOCATION IN BROCHURE

- 3.6.22. Local authorities were provided with a scheme description of a solar farm with *potential* BESS storage. But the Sunnica consultation booklet and website made no mention of these being an 'option', but rather a given. This has caused more confusion, as no plans have been issued to indicate what the scheme would entail if BESS were not included.
- 3.6.23. During the non-statutory consultation and in the webinars Sunnica maintained a position that the agricultural land in the area was poor, and non-productive. This conflicts with the experience of many local people that the land is productive farmland. It also conflicts with available information that much of the scheme is on land with a significant likelihood of being Best and Most Versatile land. Requests to carry out a soil survey to establish an independent assessment of land classification were refused and access to land was prevented.

- 3.6.24. A plan of the area is provided in Appendix 2. This shows the boundary of the Sunnica scheme overlaid on a plan showing the classification of land. It can be seen that the majority of the proposed scheme lies in areas of Grade 2 and Grade 3 land (Best and Most Versatile land). Readers of the consultation materials have likely been misled about the quality of the land, and thus may not have truly assessed the impact of the scheme during construction/ operation.
- 3.6.25. There are many, many more examples of the missing and conflicting information that are considered important in assessing the impact of the scheme. Ranging from an absence of highways details (how the scheme sites would be accessed for construction and impacts on roads, footpaths, bridle ways etc during/ after construction) to likely compulsory purchase/ access and archaeological/ heritage impacts to a lack of detail about adverse impact on wildlife.
- 3.6.26. Indeed, on pg. 19 of the consultation booklet, Sunnica only comments about habitat loss as being the main impact on wildlife. They then move on to comments about creating new habitats, but do not mention that these will predominantly be created *after* the scheme has been constructed. This does not allow the reader to truly assess the impact, as they would not necessarily appreciate that there is a gap in available wildlife habitats during the construction period, and until the newly created habitats may be established.
- 3.6.27. In the webinar dated 15th October 2020 Sunnica admitted that there would be “loss of species”. This was not indicated in any written consultation materials. In a rural area, rich in wildlife, and with many local nature-lovers and wildlife experts and enthusiasts, loss of species as a result of the scheme is a significant impact. These residents were misled by the written materials and not allowed to assess the true impact during construction/ operation/ decommissioning.
- 3.6.28. Decommissioning is another key area that Sunnica specifically said they would consult residents about, and it was included in their SoCC (Figure 20). Almost no details were provided on decommissioning, as indicated by the brochure extract in Figure 20. When asked about decommissioning in the webinars, Sunnica deflected and said that details would be in the Decommissioning Environmental Management Plan. When asked to see a draft Sunnica said this would not be put together until 6-12 months before decommissioning takes place.

Decommissioning

The Scheme would be designed for an **operating life of at least 40 years**. Once the Scheme reaches the end of its operating life, it would be decommissioned in accordance with a decommissioning plan that will need to be approved as part of the DCO. This would involve, for example, removing the solar panels and BESS and **restoring the land to its previous condition**. This means farmland will not be permanently lost as a result of our proposals. The solar panels and batteries would be recycled at this stage.

Decommissioning is expected to take between **12 and 24 months to complete**.

Sunnica Limited would have a **legal responsibility** throughout the operational life of the Sunnica Energy Farm to ensure that it complies with the DCO and all other relevant legislation and regulations.

FIGURE 20 - BROCHURE SECTION ON DECOMMISSIONING

- 3.6.29. Sunnica stated in their Statement of Community Consultation that they would consult on “Impacts from Decommissioning” (Figure 12). However, as no details were provided on decommissioning apart from a very brief statement, devoid of impacts, consultation on this subject has not been achieved.
- 3.6.30. Unhappy with the level of information provided by Sunnica, residents wrote to local MPs asking them to seek clarification from Sunnica on decommissioning (and other matters), but they also received a similar response (Figure 21). There is no detail – not even in draft form - of how decommissioning will be undertaken, who will be responsible, etc. No guarantee that all materials will be recycled, no guarantee that components would not go into landfill (and create another environmental hazard). No indication of likely cost, etc. Residents have therefore not been consulted on decommissioning and have not been able to assess the potential legacy that will be left behind once the scheme comes to an end.
- 3.6.31. The consequence is that there has not been effective consultation on decommissioning. The Planning Inspectorate is being asked to examine a scheme that will be in place for over a generation, with details of its decommissioning to be worked out after it has been consented.

A Decommissioning Environmental Management Plan (DEMP) and a Decommissioning Resource Management Plan (DRMP) will be prepared and implemented to manage the decommissioning of the Scheme. These will be produced at least six months prior to decommissioning and will be secured by the DCO ensuring that Sunnica delivers on the commitments it makes in respect of decommissioning.

The DRMP will detail the management of resources during decommissioning, including the planned destinations for reuse, recycling or landfill of materials at the time of this occurring. During all phases of the Scheme, the Waste Hierarchy will be adopted to ensure that reuse and recycling of all materials is prioritised. Section 16.7 of Chapter 16 Other Environmental Topics in the PEI Report provides further details.

The Decommissioning Environmental Management Plan will detail the mitigation measures to be adopted by the contractor during decommissioning so as to prevent and / or minimise effects on a


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range of environmental parameters during decommissioning. It will be similar in format and function as the CEMP, which will be followed by the contractor during construction. An Outline CEMP has been produced and is provided in Appendix 16C of the PEI Report, which is an example of the type of document that will be produced.

FIGURE 21 - EXTRACT FROM LETTER TO LUCY FRAZER MP

- 3.6.32. Misleading and confusing statements about Sunnica having a legal responsibility throughout the operational life of their Energy Farm, which contradicts their comments in later webinars (e.g. Q&A webinar dated 18/11/2020) that they may sell on the DCO if it was granted and that ownership would not be the same throughout the operational life of the scheme.
- 3.6.33. Sunnica's likely intention to obtain the DCO and sell it on as a speculative opportunity should have been highlighted in the consultation material. Some people may have been reassured by statements in the material from the organisation that they believed would also operate the scheme for the 40 year duration. They may view the impact of the scheme differently if they thought it might change hands several times in its' lifetime, and therefore provide uncertainty in relation to who is responsible for the scheme during construction, operation, and decommissioning.

- 3.6.34. Excessive use of ‘The Rochdale Envelope’ throughout the consultation process. Sunnica used this concept in order to provide insufficient details on which residents could be consulted. The Rochdale Envelope principle expects applicants to state the ‘worst-case scenario’ of many relevant factors for public consideration i.e. environmental impact, safety, etc.
- 3.6.35. Worst-case scenarios were *not* provided by Sunnica – just an omission of any detail. Consultees need further consultation so that these details, or ‘worst-case scenarios’ may be considered.
- 3.6.36. As stated in the Planning Inspectorate’s guide to using the Rochdale envelope ([Advice-note-9.-Rochdale-envelope-web.pdf \(planninginspectorate.gov.uk\)](https://www.planninginspectorate.gov.uk/advice-note-9-rochdale-envelope-web.pdf)),
- “the assessments should be based on a cautious ‘worst case’ approach”
and the level of information required should be:
 - “sufficient information to enable ‘the main,’ or the ‘likely significant’ effects on the environment to be assessed.”
- 3.6.37. This has not been adhered to during the Sunnica Statutory Consultation. Only an absence of any detail about batteries, alternative sites, decommissioning, and more.
- 3.6.38. The Rochdale envelope guide also states that:
- “The need for ‘flexibility’ should not be abused - this does not give developers an excuse to provide inadequate descriptions of their projects.”
- 3.6.39. Residents, councillors, and MPs alike consider Sunnica’s descriptions to be inadequate.
- 3.6.40. An example of the uncertainty in Sunnica’s plans can be heard during their webinars . This clip includes multiple references to the PEIR, which was not accessible to all.
- 3.6.41. Misleading and inaccurate statements in the Statutory Consultation booklet that the scheme had been made ‘smaller’ by Sunnica following feedback from the non-statutory consultation. The scheme boundary changes were due to a landowner in Freckenham withdrawing his land from the scheme, and Sunnica seeking alternative sites. The gap was filled by a landowner from West Row, who offered an area of land around Isleham. This culminated in the previous single site near Freckenham being replaced by two ‘smaller’ sites. But this addition made the impact even greater, as it required an additional cabling

route to connect the patchwork of solar sites together and surrounded even more villages. These areas, being added so late to the scheme, were disadvantaged from the outset from being effectively consulted, as previously outlined in this report.

- 3.6.42. Other 'reductions' and 'amendments' that Sunnica implied as being made following community feedback were also not entirely truthful. Some of the changes in land use within the scheme boundary that were outlined in the late August 2021 update leaflet had to be made because of archaeological/ wildlife findings from their surveys. Not necessarily as a result of listening to community feedback.
- 3.6.43. Misleading images throughout the consultation booklet, showing panels of around 1.5m high (e.g. Figure 2). Lack of transparency regarding the scale of the scheme in acres/hectares (around 2500 acres), so residents were unable to assess how it compares to the solar farms in this area, which typically range in size from 25-200 acres. This needed to be highlighted by Sunnica as many residents had no concept of this from their first impressions of the brochure. If approved, this would be the largest solar plant in Europe at the present time. But this is not mentioned anywhere in the brochure, website or in the SoCC.
- 3.6.44. In the SoCC Sunnica merely stated that the scheme is a NSIP that exceeds 50 MW (Figure 22). But it doesn't state by how much. 500 MW is a significant leap from 50 MW, and is much greater from what local understanding of a 'typical' solar farm output is (operational solar farms in this area are between 5 and 38 MW). The purpose of a public consultation is to draw attention to the public to what the scheme involved but this was not clear.

The planning process

We are developing the proposed Sunnica Energy Farm under the Planning Act 2008. This is because its proposed generating capacity exceeds 50 megawatts (MW), which means that under the Planning Act 2008 the Sunnica Energy Farm constitutes an NSIP requiring a DCO.

Unlike planning applications, which are considered by local authorities, DCO applications are made to the Planning Inspectorate (PINS). This independent body administers the application process on behalf of the relevant Secretary of State. In this case, the appropriate government department is the Department for Business, Energy & Industrial Strategy (BEIS). Further information on the DCO application process can be obtained from PINS Advice Note 8: Overview of the nationally significant infrastructure planning process for members of the public and others. A link to the document is here: <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2013/04/Advice-note-8.0.pdf>

FIGURE 22 - EXTRACT FROM SOCC

3.7. Inadequate Advertising, Insufficient Time for Review, Lack of Responses

- 3.7.1. The Statutory Consultation started during an escalating Covid-19 pandemic and included a 4-week period of national lockdown, followed by a period of restricted movement. Sunnica only extended the consultation period by 16 days, which could not compensate for the lengthy time that people had to limit their movements and access to information. The overall consultation time was insufficient given that it was held during a pandemic.
- 3.7.2. In addition, during this time, many consultees, or organisations that residents contacted to ask for advice/ additional detail to assess the impact of the scheme were either closed or running on limited staff. This resulted in lengthy time delays getting responses. Residents consequently ran out of time to add these points into their consultation response and to their assessment of the impact.
- 3.7.3. Lack of response by Sunnica to questions submitted by residents and Parish Councils alike – either written questions from letters and emails or those submitted during webinars (as previously outlined in this report). As an example, Freckenham Parish Council is still awaiting a response to their non-statutory consultation comments, as well as written questions submitted by email to Sunnica on 15th July 2020 and 21st September 2020, prior to the Statutory Consultation. Residents also submitted questions via email, which also went unanswered.
- 3.7.4. Sunnica were also slow to reply to written questions during the Statutory Consultation. Telephone calls were left with the promise of a call back, which never came. For example, the CAG called to ask about alternative options for providing access to the PEIR in the villages. The Sunnica representative said they would discuss and call back, but they never did. It was all very unsatisfactory and prevented residents from being able to understand and assess the impact of the proposal within the allocated time.
- 3.7.5. Instructions on how to book an individual appointment to speak to a member of the Sunnica staff was located on the back of the consultation booklet, in small print. The use of small font sizes was raised by a Parish Council, as this discriminates against those with visual impairment. A statement at the front of the booklet in larger font, or in other advertising, would have been more effective in ensuring appointments were accessible to those who needed them.

- 3.7.6. Councils also informed the CAG that they had been given insufficient time to consider the Statement of Community Consultation (from 3rd Aug-1st Sept 2020) during the pandemic. Not only was this released during the summer holidays, but effective consideration by Officers was difficult to achieve with staff illnesses, remote working, etc.
- 3.7.7. Consultation notifications in local newspapers were inadequate. These were written in the small print at the back of newspapers that were not so widely read (e.g. Figure 23). No advertisements were placed in local village publications (which are hand delivered to every household), or the town/village community Facebook groups. These would have been far more effective. We have made the point previously that, in the modern age, local newspapers are in decline and although notice publication in local papers is a legal requirement, it is not effective.
- 3.7.8. Sunnica stated during one of their webinars that they ran a paid Facebook campaign resulting in 'several thousand' page impressions – but the village community Facebook groups did not see any posts, so it is unclear if these 'impressions' were seen by the intended recipients.
- 3.7.9. The nature of the advertisements that Sunnica ran in local newspapers was ineffective (Figure 13). Very small white text on a dark background, making them difficult to read. In addition, the same inadequate description for the scheme was used in these (Burwell in Cambridgeshire) as discussed previously, meaning that many residents (especially in Suffolk) would not have paid much regard to these.

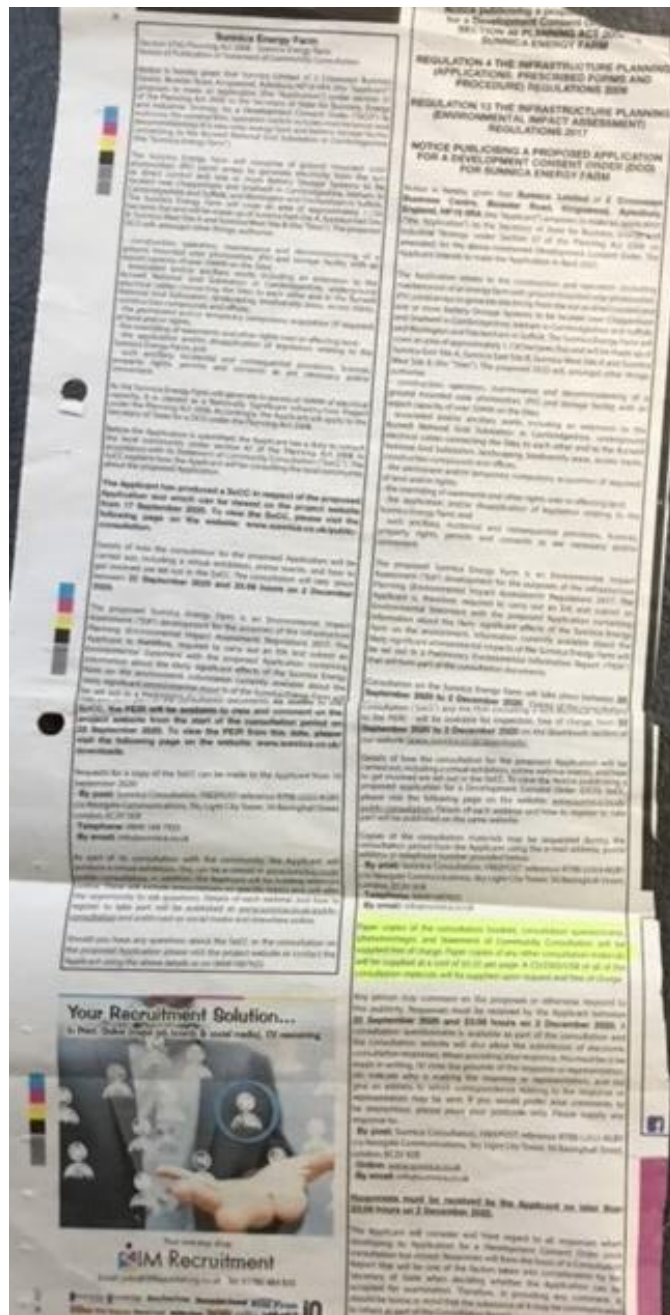


FIGURE 23 - NOTICE IN NEWMARKET JOURNAL

3.7.10. Initially, there was no physical advertising in the form of posters/ banners in the villages. Banners are required by West Suffolk Council’s Statement of Community Involvement as “Line of sight publicity.” Adoption of local authorities Statements of Community Involvement is recommended by Advice Note 2 from the Planning Inspectorate, Section 5.3:

“A local authority’s adopted Statement of Community Involvement (or Community Involvement Scheme in Wales) is likely to have a bearing on its response to the developer’s SoCC Consultation.”

- 3.7.11. Freckenham Parish Council requested a banner for each village in Consultation Zone 1 as a written question to the Parish Councils Alliance briefing by Sunnica on 21st September 2020 (the evening before the Statutory Consultation started).
- 3.7.12. One single banner was eventually sent to each Parish Council in late October/early November – mid way through the consultation. An example is shown in Figure 24.
- 3.7.13. More banners/ posters were needed to advertise the consultation, and these should have been in place in the lead up to the consultation starting, not part-way through.
- 3.7.14. By the time the banners finally arrived and were put in place there was a second national lockdown, meaning that residents were not moving around the villages, which significantly reduced their effectiveness.



FIGURE 24 - BANNER PROVIDED BY SUNNICA

- 3.7.15. The consultation dates changed from 22 Sep-2nd Dec 2020 to 22 Sep-18th Dec 2020, but the banners were not updated. This led to confusion as many people were unaware that they had an additional 16 days to respond to the consultation period. They thought they had missed the deadline to respond when in fact this had changed.
- 3.7.16. The lack of effective advertising limited the awareness of the consultation, which was reflected in the lack of engagement in online activities such as the webinars, as outlined in section 2.5.

3.8. Consultation Response Receipt/Tracking

- 3.8.1. Consultation responses that were submitted via Sunnica's paper questionnaire were not traceable. The questionnaires were not numbered or coded, so there was no way of gauging gaps in responses or issuing receipts to confirm they had arrived at the Sunnica address. There was no way of obtaining any statistics on the number of responses compared to the numbers of questionnaires distributed.
- 3.8.2. For example, Kennett and Snailwell were highlighted in the SoCC as villages that had not previously been engaged consultation. But there was no way of assessing how many paper responses were returned from Kennett or Snailwell unless the responder divulged their location details (which was optional).
- 3.8.3. Consultation responses submitted via the online questionnaire also had no confirmation of submission or acknowledgement of receipt. The sender had no indication that their consultation responses had been sent and did not receive a copy of the online responses they had submitted, which would have been helpful for future reference.
- 3.8.4. Responders complained that they were unable to check that their responses to all sections of the questionnaire had been received.

4. Conclusion

- 4.1.1. Sunnica has not complied fully with their Statement of Community Consultation.
- 4.1.2. Local people were not given access to information to enable them to consider the proposals fully. Information that was provided was in some cases incorrect and biased in favour of Sunnica (agricultural land classification). Pertinent questions in the webinars were deflected and alleged to be the responsibility of an un-named third party, the funder. People who thought they were talking to the future holder of obligations, found they were not.
- 4.1.3. The nature of the BESS was concealed. It was not clear that this could also be an energy trading scheme, and that the BESS were for storing energy (from renewable and non-renewable sources) from the grid, not just smoothing PV generation.
- 4.1.4. There was excessive reliance on postal address information, excluding anyone who did not have a postal address, or may have had the misfortune to live in a newly built property. Some properties that were occupied were deemed unoccupied. There was a lack of due diligence on the part of Sunnica.
- 4.1.5. Even where Sunnica had contact details they posted a letter by nailing it to a gate. And then, when asked for further information, did not provide details.
- 4.1.6. Many people who were not directly impacted during the statutory consultation found that they were at a later stage impacted by changes to access routes and road/junction widening. They were sent small-scale plans showing just a red line boundary, but no details of what their land was required for, or if this was permanent or temporary.
- 4.1.7. People found at a late stage that they were at risk of compulsory purchase for improvements for access routes. They were not properly consulted, only sent a small-scale plan showing the red line boundary with no information on the works proposed.
- 4.1.8. There was no consultation on decommissioning as set out in the Statement of Community Consultation. No details were provided of how this would be achieved or secured.
- 4.1.9. When asked in our survey 93% of respondents did not feel they had been consulted properly. Some 44% had heard about the scheme by word of mouth, and only 60% had received a consultation booklet. These were people living in Zone 1 who were all supposed to have received a direct mailing.

- 4.1.10. Only 35% of respondents were aware of more information being available on the Sunnica website. Of those that did access the website only 7% found it easy to find information they were looking for.
- 4.1.11. Some 67% of people found it difficult to visualise the proposals from the information provided. 58% of people said they could not understand the scheme properly, 49% were unable to ask questions to help them understand it, and 50% were unaware of the impact upon them.
- 4.1.12. The consultation cannot be considered adequate and consequently we ask the Planning Inspectorate to reject the application at this stage.

5. References/Media articles

- Joint Response to Statutory Consultation by 4 host authorities:
[REDACTED]
[REDACTED]
- East Cambridgeshire District Council planning meeting 2nd Sept 2020. Sunnica proposal discussed at 2 hours. [East Cambridgeshire District Council, Planning Committee 2nd September 2020 - YouTube](#)
- West Suffolk Councillor comments about the consultation being 'farcical' (3.01 minutes) 7th Dec 2020. [Say No To Sunnica - YouTube](#)
- Ely Standard Newspaper article 21st Sept 2020: ['Man up' and start talking energy firm told](#)).
- East Anglia Daily Times article 11th Nov 2020 with comments from several Suffolk County Councillors regarding inadequate consultation
[REDACTED]
[REDACTED]
- Freckenham Parish Council complaint letter to Sunnica on 9th Oct outlining concerns about the consultation. Sunnica declined to offer additional support for most of the concerns raised ([9.10.20-Sunnica-stat-consultation-complaint.docx.pdf \(suffolk.cloud\)](#))
- Consultation not good enough. Report in Newmarket Journal 29th Nov 2020
[REDACTED]
[REDACTED]

Appendix 1 – Summary of CAG Survey Results

We undertook a survey of local residents to capture their views on the adequacy of the Sunnica consultation.

Method

Paper copies of the survey were distributed in villages located within Sunnica's 'Consultation Zone 1' (taken from the SoCC)

The survey was also made available online using Survey Monkey.

The link to the online version was distributed within Consultation Zone 1 via village Facebook groups, as well as

Parish Council Facebook pages and through leaflets and village newsletters that were in circulation at that time.

Responses

Overall, there were 600 responses. This comprised 112 from the paper survey and 488 from the online survey. The responses are summarised in Table 1

TABLE 1 CAG SURVEY RESPONSES

Q1 Are you aware of the Sunnica solar and battery proposal?

<u>Response</u>	<u>Online</u>	<u>Burwell paper</u>	<u>Non-Burwell paper</u>	<u>Total</u>	<u>Percentage</u>
Yes	485	76	23	584	97%
No	3	13	0	16	3%
Total	488	89	23	600	

Q2 How did you first find out about the Sunnica scheme?

<u>Response</u>	<u>Online</u>	<u>Burwell paper</u>	<u>Non-Burwell paper</u>	<u>Total</u>	<u>Percentage</u>
Word of mouth	209	30	14	253	44%
Received information directly from Sunnica Ltd	73	11	4	88	15%
Online	64	5	1	70	12%
Local media	80	18	3	101	17%
Other	58	8	0	66	11%
Total	484	72	22	578	

Q3 Did you receive a Sunnica Consultation Booklet?

<u>Response</u>	<u>Online</u>	<u>Burwell paper</u>	<u>Non-Burwell paper</u>	<u>Total</u>	<u>Percentage</u>
Yes	297	36	17	350	60%
No	187	36	6	229	40%
Total	484	72	23	579	

Q4 Were you aware of the same, and more, information on the Sunnica website (Sunnica.co.uk)?

<u>Response</u>	<u>Online</u>	<u>Burwell paper</u>	<u>Non-Burwell paper</u>	<u>Total</u>	<u>Percentage</u>
Yes	180	13	6	199	35%
No	299	51	16	366	65%
Total	479	64	22	565	

Q5 Were you made aware of the size/ acres/ hectares of the Sunnica scheme (over 2700 acres/ 1100 hectares)?

<u>Response</u>	<u>Online</u>	<u>Burwell paper</u>	<u>Non-Burwell paper</u>	<u>Total</u>	<u>Percentage</u>
Yes	251	16	11	278	49%
No	231	49	11	291	51%
Total	482	65	22	569	

Q6 Are you aware that the Sunnica scheme will take this area out of productive (arable) agricultural use for at least 30 years?

<u>Response</u>	<u>Online</u>	<u>Burwell paper</u>	<u>Non-Burwell paper</u>	<u>Total</u>	<u>Percentage</u>
Yes	305	37	18	360	63%
No	181	29	4	214	37%
Total	486	66	22	574	

Q7 – Did not concern the consultation

Q8 A number of matters were not included in the Sunnica Consultation Booklet, or few details were given.

Which of these do you consider important matters? (tick all that apply)

<u>Response</u>	<u>Online</u>	<u>Burwell paper</u>	<u>Non-Burwell paper</u>	<u>Total</u>	<u>Percentage</u>
Selection of the area chosen for the scheme	391	48	20	459	80%

Locations of existing solar farms already in this area - Within a 15 mile radius of the Sunnica scheme area there are already 11 solar farms operational, 9 more under/awaiting construction (as of June 2021).	386	49	18	453	79%	
Computer generated imagery of the visual impact of the scheme, including at different intervals (e.g. 1, 10 and 20 years)	344	41	16	401	70%	
Use of the land after 25 years (possibly up to 40 years) of use by the scheme	404	44	20	468	82%	
Guarantees of scheme removal and return to it's previous agricultural use once ended (and after no more than 40 years)	388	41	20	449	78%	

Road and lane widening through villages to accommodate the scheme	413	46	20	479	83%	
Footpath/ bridalway/ public right of way closures	427	50	20	497	87%	
Compulsory purchase/ leasing/ access of residents' land and property	411	51	21	483	84%	
Size, capacity and technology of the Battery Energy Storage Systems	407	49	20	476	83%	
Noise impact	n/a	42	18	60	61%	
Impacts on existing wildlife / ecology	439	55	20	514	90%	
Heritage and archaeological impacts	377	50	20	447	78%	
Total	475	76	23	574		

Q9 From the information provided by Sunnica in their Consultation Booklet, how easy was it for you to visualise the impact of the scheme?

Response	Online	Burwell paper	Non-Burwell paper	Total	Percentage	
Easy	54	6	2	62	11%	
Difficult	319	40	14	373	67%	
Other	101	13	6	120	22%	
Total	474	59	22	555		

Q10 If you accessed the online information on the Sunnica.co.uk website, how easy was it to find the information you were looking for?						
Response	Online	Burwell paper	Non-Burwell paper	Total	Percentage	
Easy	36	0	0	36	7%	
Difficult	186	7	6	199	36%	
Did not access the website	220	41	15	276	50%	
Other	29	6	2	37	7%	
Total	471	54	23	548		
Q11 Were you aware of the webinars that were held by Sunnica?						
Response	Online	Burwell paper	Non-Burwell paper	Total	Percentage	
I was unaware of the webinars	301	49	15	365	65%	
I was aware of the webinars but did not attend them	117	10	2	129	23%	
I attended some/all of the webinars	64	0	4	68	12%	
Total	482	59	21	562		
Q12 What is your view of the webinars? (tick all that apply)						
Response	Online	Burwell paper	Non-Burwell paper	Total	Percentage	
The webinars were an adequate replacement of physical meetings and exhibitions in villages	24	2	3	29	5%	

The webinars were not an adequate replacement for meetings/exhibitions in villages	162	6	6	174	32%	
I was able to ask questions and receive adequate answers about the scheme	8	0	1	9	2%	
I was unable to ask questions about the scheme	38	1	3	42	8%	
I was able to ask questions but did not receive adequate answers	38	0	1	39	7%	
I did not attend the webinars	297	27	6	330	60%	
Other (please specify)	62	6	6	74	13%	
Total	451	76	23	550		

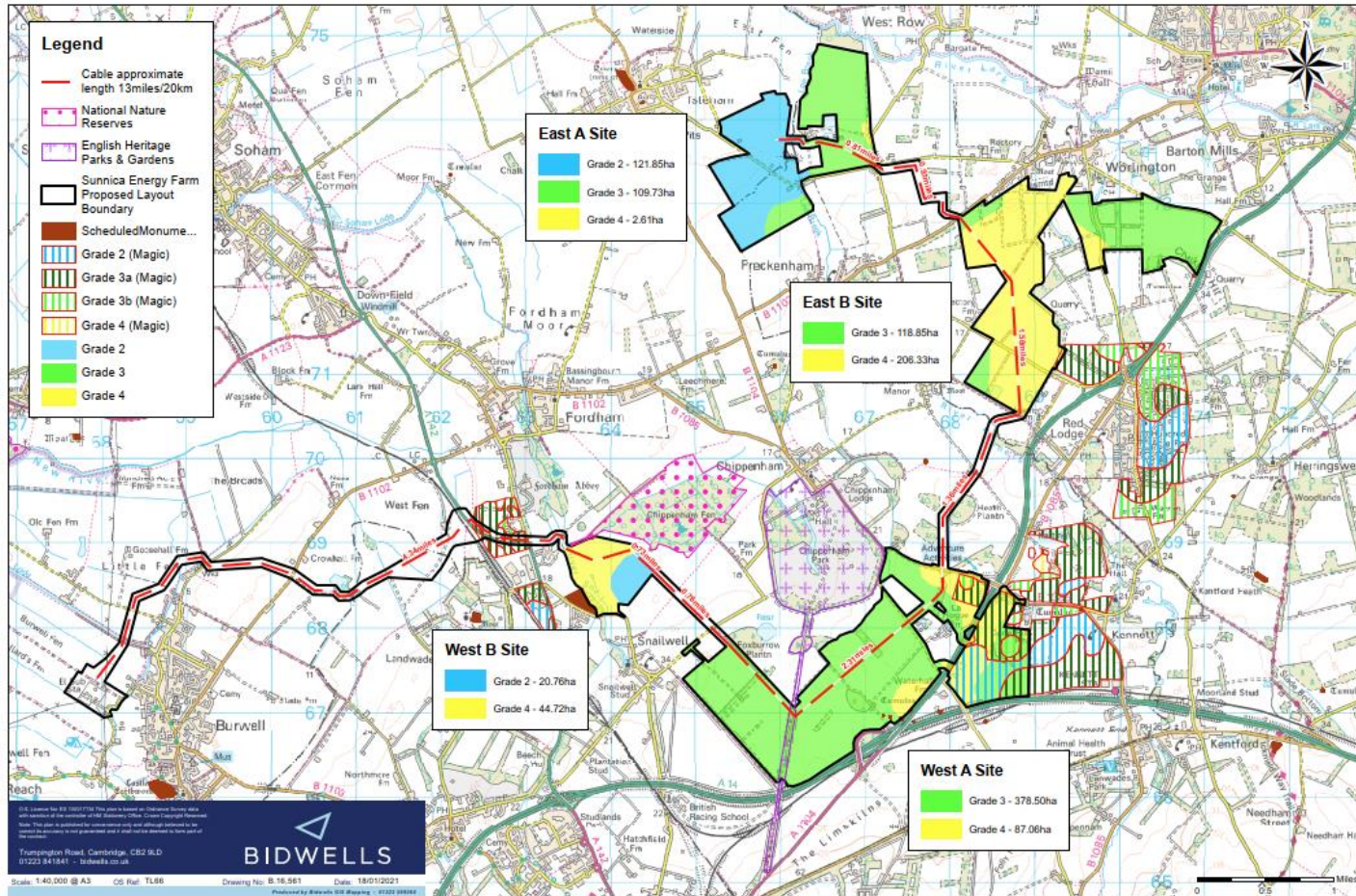
Q13 Were you able to access the information in the PEIR (preliminary environmental information report)?

<u>Response</u>	<u>Online</u>	<u>Burwell paper</u>	<u>Non-Burwell paper</u>	<u>Total</u>	<u>Percentage</u>	
Able to access	46	3	0	49	9%	
Unable to access	67	10	6	83	15%	
Unaware of the PEIR	368	40	16	424	76%	
Total	481	53	22	556		

Q14 In terms of statutory consultation what effect did the absence of meetings/ exhibitions or information displays in villages have on you? (tick all that apply)						
Response	Online	Burwell paper	Non-Burwell paper	Total	Percentage	
I could not understand the scheme properly	289	27	15	331	58%	
I was unable to ask questions about the scheme	240	26	14	280	49%	
I was unaware of the impact of the scheme on me	251	28	10	289	50%	
It had no effect on me	40	3	1	44	8%	
Other (please specify)	35	5	3	43	7%	
Total	475	76	23	574		
Q15 What effect did the Covid-19 restrictions and national lockdown have on your understanding of the scheme? (tick all that apply)						
Response	Online	Burwell paper	Non-Burwell paper	Total	Percentage	
I was unable to be consulted properly	318	29	15	362	63%	
I was unable to attend meetings in villages	268	17	10	295	51%	
It had no effect	72	13	2	87	15%	
Other (please specify)	24	3	1	28	5%	
Total	475	76	23	574		

Q16 Overall, do you feel that you were adequately consulted about the impact of the scheme?					
Response	<u>Online</u>	<u>Burwell paper</u>	<u>Non-Burwell paper</u>	<u>Total</u>	<u>Percentage</u>
Yes	39	1	1	41	7%
No	446	66	21	533	93%
Total	485	67	22	574	

Appendix 2 – ALC land classification within Sunnica Scheme



Appendix 3 - Analysis of November 2020 Webinar Q+A Sessions

The three Q+A webinar sessions were analysed with the following summary of responses:

Question Answered	133
Asker Referred to PEIR	11
Question will be answered later	32
Question not answered or deflected	67

Out of 243 questions, only 133 (55%) received a direct answer.

The questions asked and the response given (in summary) were as shown in Table 2. Where a question is deemed answered this does not imply the answer was acceptable, only that it was answered. Question to be answered later mostly referred to the DCO, but in some cases it might be at a later stage (construction or decommissioning)

The answers given by Sunnica are abridged and not verbatim. They communicate the essence of the answer given which, in some cases, may have been longer.

TABLE 2 - SUMMARY OF QUESTIONS AND ANSWERS IN Q+A WEBINAR SESSIONS

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
Are Sunnica still looking for Land?	Q+A 1	x				No
Can you tell us what E23 is?	Q+A 1	x				Proposed area of Solar near Worlington
Were other sites considered for the BESS and why were they not accepted?	Q+A 1			x		Will be produced in DCO
Please explain the BESS's and the connection at Burwell?	Q+A 1	x				About currents and inverting etc - technical
Have La Hogue pulled out?	Q+A 1				x	Conversations on going and private
What is the minimum viable size for Sunnica?	Q+A 1				x	"Confidential"
Will you disclose your business case?	Q+A 1				x	Upfront capital expenditure, Operational cost and potential revenues (mention 500 MW connection) (weekly commercial calls of people wanting to get involved)
Have you made it an NSIP to avoid local involvement? (lumped 3 smaller sites together)	Q+A 1	x				The size makes it an NSIP
How does Boris's wind promise effect Sunnica?	Q+A 1	x				Solar is part of the energy mix. Reality is the wind doesn't always blow
We have Great Crested Newts in Worlington - has this been noted?	Q+A 1			x		Yes and surveys on it will be published in DCO
Are you intending to import electricity from the national grid?	Q+A 1	x				We will, allowing us to offer a suite of grid balancing services.

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
Why can't we have a consultation where I can talk to people?	Q+A 1	x				Covid – you can phone us
We will need an evacuation for the primary school because of BESS's?	Q+A 1			x		Preparing a battery energy fire safety management plan (BEFSMP). (Claims large BESS's are widely used and experienced)
How high are the BESS's?	Q+A 1	x				Up to 6m
Can you list what is still undecided through the Rochdale envelope?	Q+A 1		x			Doesn't list them
Can you list the alternative sites?	Q+A 1			x		Will be in the DCO
Is solar not named by Boris because it isn't that green?	Q+A 1	x				Solar is bankable and everyone can get behind it
How long will it be before the carbon footprint of construction will be offset by the scheme?	Q+A 1				x	Haven't calculated this at this point but have calculated total energy generation and life cycle gas emissions.
Some of your substation schemes is going to be 8.5m high, 50m wide and 75m long? (Substations)	Q+A 1		x			Trying to limit that as much as possible but that is Rochdale envelope
Are the batteries just storing energy from Solar?	Q+A 1	x				No also from the electricity grid.
How many substations are there? And in which of the 4 areas?	Q+A 1		x			4 electrical compounds. Burwell, East site A and B and West site A
How will you ensure there is no child labour in the Cobalt you use?	Q+A 1				x	Don't want to support child labour so will take care when procuring its

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
						materials, but actually up to the funder
Do any of you live within 5 miles of the proposed site?	Q+A 1	x				No
Will batteries be double stacked? Are you worried about the risk to Red Lodge?	Q+A 1	x				No double stacking and BEFSMP
Can we have an updated image of La Hogue Road at 15 years?	Q+A 1				x	Confused about the question
Who is paying for decommissioning?	Q+A 1				x	The scheme will by setting aside security at some time through the scheme overseen by an independent but can't say when or how much
Is it true if the scheme goes ahead you can use CPO the land associated with cabling but not Solar panels?	Q+A 1	x				Aiming to reach voluntary agreements but CPO is available if DCO - can use CPO on ALL land
How many solar panels will be used?	Q+A 1				x	Not known
What changes have you made so far to the scheme as a result of resident's feedback?	Q+A 1	x				Scheme changed due to pre-consultation, also Landscape design (listened to local feedback)
Have RAF Lakenheath and Mildenhall been consulted yet?	Q+A 1	x				Luke says he 'thinks' they have been consulted. Danielle says they have spoken to MoD on behalf of them.
How few solar arrays will you need to ensure that energy trading Battery storage will be sufficiently profitable?	Q+A 1				x	Combination of a lots of things, complex relationship.

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
Does Sunnica now speak for the prime minister? (re previous question about Boris's commitment to wind)	Q+A 1	x				No they don't - Matt Just knows a lot about renewables
What will be the battery capacity storage at Burwell? Do you own the grid connect secured? Will you be buying electricity from the grid at Burwell?	Q+A 1	x				No installed capacity at Burwell Substation in relation to Sunnica's generating station. They have a bilateral connection agreement though, Yes, they will be buying but it is complicated.
IS Solar as effective as wind?	Q+A 1	x				Solar is very predictable and bankable
Have you found out the distance from schools to the BESS's?	Q+A 1				x	All about the fire safety plan. Closest schools (of 8) - 0.8 miles is the closest "well within a safe distance". But won't be their decision.
Can animals run beneath the panels? Will there be sheep?	Q+A 1	x				Sunnica's decision and yes they would like sheep
Are you planning east and west solar panels?	Q+A 1	x				Planning south facing solar panels
Is it possible to have the BESS without the panels?	Q+A 1	x				The dominant technology here is the solar panels- the batteries are a supporting system
Would schools need an evacuation plan?	Q+A 1	x				Don't think so but in BEFSMP if they need one
What extent of the battery capacity finalised?	Q+A 1				x	
Will the aspiration of grid balancing lead to an increase in proposed battery storage?	Q+A 1				x	

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
How big is the largest battery in the world and what is ours in reference?	Q+A 1				x	Doesn't know, but isn't the largest proposed in the UK
What proportion of the battery storage will come from the Solar and what will come from the grid?	Q+A 1				x	Will evolve
Why shouldn't we postpone the consultation until it is OK to meet?	Q+A 1	x				Don't want to wait, they believe this is an appropriate way of consulting
What are the transport routes around Freckenham?	Q+A 1				x	
The fire safety plan should be published for us to see and comment and when will it be available?	Q+A 1			x		An outline is drafted
What kind of explosion would you expect from the batteries?	Q+A 1				x	Not a mushroom cloud
Will you be selling off the site after securing the DCO?	Q+A 1				x	"Irrelevant" will set out a funding statement, but not going to commit to anything but it will be invested in and owners today won't be the same throughout
Can you partially bury the 6m high battery storage systems?	Q+A 1	x				Have chosen not to
Why are the number of batteries and their capacities not listed?	Q+A 1			x		Rochdale envelope
How can we consult effectively without info?	Q+A 1	x				They have provided "a lot of information"

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
Why won't you let us see the alternative sites? I don't see any harm in providing this	Q+A 1			x		This is what they have chosen to do, and they don't have to provide it
You didn't answer about the Schools evacuation plan.	Q+A 1	x		x		BEFSMP
If granted can you please guarantee me that all grass management will be done by sheep grazing as Matt said? Also that tractor mowing will not be used (Concern over wildlife in the grass).	Q+A 1	x				Will be in a management plan but no - cannot commit to just sheep.
When you calculated the greenhouse gas assessment did you include the environmental impacts of mining of lithium and Cobalt?	Q+A 1	x				Yes
Would you all prefer Sunnica or a nuclear plant on your doorstep?	Q+A 1	x				Sunnica - no longer pesticides and intensive farming - Luke was also shocked and worried about Chernobyl
Your previous answer about carbon offsetting wasn't good enough- Surely you must have a rough idea of your carbon offsetting otherwise how do we know it is green?	Q+A 1				x	The scheme calculates the carbon offset saved instead
Should it not be on a low value site not a high-value site?	Q+A 1				x	We don't assign a value the site, but think it is appropriate - it is up to the Secretary of state
When will the public be able to see the results of the consultation period?	Q+A 1	x				DCO

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
Can we see the fire service response to the batteries?	Q+A 1			x		
Will the lithium come from ethically sourced mines? Can you ensure this?	Q+A 1	x				They "would like to avoid non-ethical sources" of these products. Household names and they are trying to ensure they are sourced responsibly. Standard needs to be met by funder, not them.
It sounds like the batteries will store power from dirty sources?	Q+A 1	x				Essentially yes
Will you be taking in power from the Solar panel schemes around burwell, if so do you need more panels?	Q+A 1				x	
Please can you explain the updates in the boundary changes? And the loss of some otherwise protected areas at Chippenham Fen?	Q+A 1	x				Notified people about them and changed for access reasons
Fire safety plan needs to be produced before the application.	Q+A 1			x		Not a static thing, will change.
So it is not green after all, you will be storing energy from fossil fuels?	Q+A 1	x				Yes
Will the cables you are leaving in the ground after decommissioning degrade and how long will it take?	Q+A 1	x				Made of metal, don't know how long decomposition will take
If Sunnica goes bankrupt will there be funding for decommissioning?	Q+A 1				x	There will be a security at some point

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
I suggest it is 2.4 million panels is this correct?	Q+A 1				x	Won't know till final design, after application
Capacity of the three substations bar Burwell?	Q+A 1				x	Don't know
Is there a skeletal framework for the decommissioning environmental management plan?	Q+A 1				x	Produced much later in the scheme (5 years before decommissioning maybe)
Did the original red line alter because of the withdrawal of a landowner?	Q+A 1	x			x	Based on feedback
Will you provide drone footage of the site?	Q+A 1	x				Not for public consumption
Will you be providing information on battery safety and volatility to USAF Mildenhall?	Q+A 1			x		US bases will get an opportunity to comment at a later point
Where will you be sourcing water from?	Q+A 1				x	Exploring at the moment, Land owners reservoirs and Anglian Water are suggestions
Have you taken into account the importing of food which would have been grown on this land?	Q+A 1	x				No they haven't
Will this scheme be a precursor for other schemes across East Anglia, considering it is considered only moderately effective?	Q+A 1				x	
Matt is totally wrong to say Solar is totally predictable	Q+A 1	x				Solar is about light, and the sun comes up and goes down.
Is there scope to move the BESS's if they are unsafe?	Q+A 1	x				Won't be their decision really, would be at the suggestion of the SoS

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
The safety of the installation should be the first point to consider not the last.	Q+A 1				x	Luke agrees but cannot state any of the safety measures yet
What testing and maintenance standards will you be upholding for panels? (Arcing and Fire)	Q+A 1				x	it is rare
Will you be using infrared cameras to check?	Q+A 1				x	Explains how they work
Do you have a contingency plan for the BESS locations?	Q+A 1	x				Don't expect safety concerns due to mitigation
What will be done to ensure locals are hired to work on the scheme?	Q+A 1				x	Looking at this but no commitment at the moment
How many residents live within the villages around Sunnica?	Q+A 1				x	Sent 10,500 booklets out but don't know how many people live in the area that they will be affecting
If the owners can change, who will be responsible for ongoing safety and who is liable for a major incident?	Q+A 1	x				The applicant and the company directors
How many people will be hired from local area?	Q+A 1	x				Couldn't remember the exact figure for the jobs created, but in the PEIR, but not necessarily local
The Rochdale Envelope makes Sunnica come across as not transparent.	Q+A 1	x				This is just the rules, and they think it is an intelligent way of managing change.
Is there any way you can bury the batteries?		x				We have decided not to do this.
IS there a way you could bury the batteries?	Q+A 2	x				You can but not feasible

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
Why are you not admitting that the batteries are unsafe and unstable?	Q+A 2			x		Widely deployed across the world safety will be paramount in FSBMP
The ten point plan does not contain solar	Q+A 2	x				More recent document does include wind and solar
How can you explain all the fires and explosions in batteries?	Q+A 2				x	Learning curve at Grid level - will be learning from it
Have you ever considered a wildflower meadow in set aside?	Q+A 2		x			Yes, they will
How have you scoped the long-term development of the scheme, as it isn't part of the ten point plan?	Q+A 2	x				Will be part of the mix, don't think it will be obsolete, but others will be more effective potentially
I cannot believe you would have this on your doorstep and wind power exceeds solar	Q+A 2				x	No comment
We don't like Matt's save the world spiel, why don't you stop using him?	Q+A 2	x				It is the environment and everyone's spiel - a lot of people have the same opinion
It all comes down to a NSIP which will damage the land around here forever, how can you live with yourself?	Q+A 2	x				Sunnica are aiming to give a net benefit in terms of biodiversity, local socio-economics and the environment
Luke you know better than me that the scheme changed as a land owner pulled out, not because of feedback.	Q+A 2				x	One and the same
Do you feel uncomfortable with so many people opposed to this because you think you have NSIP backing?	Q+A 2	x				No- the level of engagement is a success of the consultation

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
You seem to not be able to avoid child labour?	Q+A 2				x	To avoid 'where-possible' child labour, can't guarantee that
Matt what is the largest project you have managed to date?	Q+A 2	x				In US have 500MW projects but Sunnica is the largest
This answer on child labour is not good enough.	Q+A 2				x	Sunnica aren't part of the procurement project
How could this project be reduced in size as this is the big issue of this project?	Q+A 2	x				It won't be reduced
If the development of solar is ever improving will the tech not go out of date very quickly?	Q+A 2	x				Yes. but it won't be obsolete
I have emailed in to Sunnica multiple times and only some have been replied to, are you just answering easier questions?	Q+A 2	x				Takes a while to fact-check more technical questions, so can take a while
What role does Newgate Consultation have in the consultation? Why are our responses being sent to them?	Q+A 2	x				Experience in this field in tracking responses and DCO's, Sunnica doesn't have the capacity for it
How will you be outlining the responses to the consultation do you have to consider every point?	Q+A 2	x				All comments have to show due regard from the applicant
How can the statutory consultation continue without knowing alternatives (and other info), it is not effective	Q+A 2			x		Will be in the DCO
Sunnica claimed that they didn't know the answer to specific questions, yet having fully assessed the whole site they should know the	Q+A 2		x			Don't have the final design, have an indicative design (PEIR)

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
answers, and therefore it seems they just don't what to tell us.						
If no batteries at Burwell, does that mean imported energy is sent all the way back to BESS's on sites? Is that not inefficient?	Q+A 2	x				Yes, but losses are marginal
What is the capacity of the BESS in MWh and what is area of battery storage?	Q+A 2			x		Info will be in DCO to a certain extent
Please advise on digging the trenches along the Fordham house court estate will impact businesses in Fordham? Concerned about Pollution, Noise and accessibility?	Q+A 2			x		Temporary disruption, but in the construction plan
I would like to know the impact of the scheme will have on local villages?	Q+A 2		x			Very general
How long will building take?	Q+A 2	x				About 2 years
Where will the workers live?	Q+A 2				x	Off-site but located within a certain area (Not sure what that is)- B and Bs and hotels
Where will the workers and lorries park?	Q+A 2	x				2 proposed car parks
Claim 994 jobs will be created in deconstruction but how can you assume this so far in advance and this seems an over assumption?	Q+A 2				x	Will go away and check
Have you included cost of decommissioning in your plans?	Q+A 2			x		Will be in decommissioning document and responsibility of the funder

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
What will happen to the batteries requiring recycling before decommissioning statement is produced?	Q+A 2				x	Batteries can be up-cycled and repurposed etc, but most likely a new sector for recycling batteries- no mention of how they will do it
When is the development is complete, it will likely be sold on, what will they legally be bound to do?	Q+A 2	x				Bound to DCO
At the end of the scheme will the land change from green field to brownfield?	Q+A 2	x				No it won't
Have you signed up the landowners?	Q+A 2				x	In the process of completing the property agreement, but no legal obligation to say
Have you signed on the landowners along the cable route?	Q+A 2				x	Negotiating with landowners all the way along
How have you not considered whether the area is of high or low value in deciding the appropriate area?	Q+A 2	x				Consider value to society and value for wildlife.
You will be closing the right of way (Ickfield) which is vital to local services and so many people? How is this appropriate?	Q+A 2				x	Safety is important, and not sure if they will, or in time include it
Putting the commitment on the funder for avoiding child labour isn't good enough?	Q+A 2				x	Can't comment
Can you please define how loud construction will be and will there be a background hum through the scheme?	Q+A 2	x				90/110 decibels- similar to roadworks for construction. Batteries will make a noise.

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
Will construction traffic travel through villages HGV? Will there be a plan in place to repair roads afterwards and will they be going through villages at 6am?	Q+A 2		x			In traffic plan and movements are broken down.
Will HGV's be using the street in Snailwell? And in what numbers?	Q+A 2	x				Yes, and one HGV a day most likely
You have split the sites up, have you considered other parts of the UK for this site?	Q+A 2				x	Scale of the need is dramatic
How big is the next biggest solar farm in the UK?	Q+A 2	x				Cleve Hill
Where has there been a scheme on this scale carried out before to determine long term health risks?	Q+A 2	x				Spain and China, but none on the scale of this in the UK
You say there will be no significant impact on health and well-being, please can you define significant?	Q+A 2				x	Uses methodology of health department, but considers holistic approach of during construction and operation
I am concerned about my drinking water? Have you consulted with Anglia Water and will there be ongoing assessment?	Q+A 2			x		Will be ongoing assessment, have consulted with Anglia water and will continue to do so. Piling isn't deep enough to contaminate water
How long after the solar panels are removed will it be appropriate for agriculture again?	Q+A 2	x				Almost immediately
What is Matt's role on an Essex solar project, etc?	Q+A 2	x				Matt owns other companies and is director on various schemes

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
Can you commit to never using overhead towers for cabling?	Q+A 2	x				Currently putting all below ground.
How big are the main connection cables (Diameter, material and size)?	Q+A 2			x		Depends on markets and prices and specifications of the scheme
Please can you video the site on drone, both before and after construction?	Q+A 2				x	Good idea but not sure
Are there any plans to upgrade the road infrastructure as will be using small lanes?	Q+A 2			x		Could do, will be approved before construction
Matt please can you tell us about the financial status and experience of PS Renewables?	Q+A 2	x				One of the companies he owns, Padero Solares owns PS renewables, can find finance details on Companies House
Cable jointing chambers will be needed, how large are they? How many? Will they be dug up at the end?	Q+A 2	x				Mentioned in other webinars, will have to get back to you but (20mx5mx2m) and won't be dug up
The change of use from farming to solar will change the microclimate (Wind, temp, humidity etc)	Q+A 2	x				Not such a big problem in the UK - in Dubai, minimal change but not considered an issue
It is encroaching far too much on villages?	Q+A 2	x				Feedback taken onboard from previous consultations
Is your contribution to the national grid coming from Solar only?	Q+A 2	x				Generating electricity from the solar, but importing from the national grid
What additional economic advantages does Solar have over wind in the cold and windy UK?	Q+A 2				x	UK is good for solar

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
Over 40 years as technology improves, is there a break clause that allows you to decommission before the 40 years?	Q+A 2	x				Yes, there is
Why aren't you buying these from the UK?	Q+A 2	x				Not made in the UK at a low cost
How many times will the batteries and panels need replacing in the scheme?	Q+A 2				x	Unsure, depends on the technology
There is a difference between renewable and sustainable energy, solar farms are being installed with no knowledge on how to recycle panels and batteries, creating a problem for the future.	Q+A 2				x	
China are using huge amounts of coal electricity to create solar panels.	Q+A 2					Feeds into the carbon calculations
Matt how many projects have you managed that have been completed?	Q+A 2	x				Over 30, look after over 300 projects
Seems to be growing opposition to this scheme and you seem unwilling to withdraw, can you at least apologise for the horrors you are imposing on the area?	Q+A 2					There is a need for these schemes
Can Matt and Luke answer if they have any connection to Paderos?	Q+A 2	x				Matt is co-owner
Can we see your safety plan for review? If not how is this an effective consultation? Very few people can be interested parties if they don't have this sooner?	Q+A 2			x		BFSMP is still in draft form

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
Who are the big 6 (energy producers - Investors)	Q+A 2				x	Didn't say
Your proposal uses good farmland, north of Brandon is heath land which would be more appropriate?	Q+A 2			x		Methodology of alternatives in PEIR and more in DCO
Why is your project so big?	Q+A 2	x				Big need
Is this project only viable at this size due to the huge amount of cabling?	Q+A 2				x	Lots of factors
Would you buy houses in this area if it were so close to a scheme like this?	Q+A 2				x	Our aim to mitigate the visual impact
I have spoken to the older population of the village, who don't do webinars, why don't you wait and do it properly when we all meet?	Q+A 2	x				Don't know when Covid will end and this is deemed appropriate
All tech becomes obsolete.	Q+A 2	x				Yes it does, it will be the same here, it will serve out its purpose
This is the biggest project in Europe, either all the others lose money or this one could be smaller?	Q+A 2	x				There is a need
Why was the BESS relocated closest to Red Lodge?	Q+A 2	x				Deemed to be a good location- close to transport links, don't think it is very close to schools and residents.
If this scheme is deemed to be financially viable, what compensation can home owners receive due to property devaluation, not to mention not being able to sell them?	Q+A 2	x				Don't think it will impact the housing prices

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
How would you all feel people were killed from a battery fire, or is this not your problem?	Q+A 2			x		It is the responsibility of the project, but it is very unlikely and BFSMP will be thorough.
Do Newgate Comms have a comprehensive media monitoring system in place?	Q+A 2	x				Yes
If we need batteries put them well away from people if they aren't safe.	Q+A 2				x	
Isn't this just a tick box exercise for you and just talking and not listening?	Q+A 2	x				Untrue- we will be responding to feedback
How can you say the PEIR is comprehensive if you haven't provided information?	Q+A 2			x		The PEIR isn't meant to be final, more in DCO
If the farm is built, would Sunnica like to buy my house off me at the market rate and send their children to the school 1km away from the BESS.	Q+A 2	x				Won't buy people's houses but yes Matt would live near the BESS
Your idea that we will all be using electric cars is wrong- get real, we will be long beyond this tech by the time this scheme is completed.	Q+A 2					Electric car revolution is coming.
Can you please ask Luke to stop talking about alternatives methodology, show us the list.	Q+A 2			x		Will be in the DCO
Roughly how many panels can go on one acre of land?	Q+A 2				x	Changes, but will come back to that.
What is the highest structure on the sites?	Q+A 3	x				Burwell substation - could be up to 12m in height

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
If you can serve section 172's and get DCO to grant CPO does that mean the scheme can go ahead with no landowners permission?	Q+A 3				x	Talked about section 172's for access but did not say whether the scheme could go ahead without permission but get CPO if strong case so - YES
Does Sunnica expect to be granted gov subsidies?	Q+A 3	x				Funded privately
Why have you not included the inevitable fall in housing prices in the socio-economic impacts report?	Q+A 3	x				No evidence to say housing prices fall
What are the socio-economic benefits for locals?	Q+A 3		x			Construction jobs, however, this is at the discretion of the construction contractor
Construction jobs will only be temporary what benefits are there?	Q+A 3		x			Full- time jobs (4) and access to the scheme, internships, apprenticeships and business rates
So will the people currently employed on the farmland will be offered jobs on Sunnica?	Q+A 3	x				No, spoke with farmers and their operations are flexible so little impact
Is it true La Hogue have pulled out?	Q+A 3	x				Confidential
What are the safety records in terms of expected accidents, injuries and death? What do you predict for this including panels, cabling, batteries and road accidents?	Q+A 3				x	Haven't got a health and safety plan
Are you going to answer the left-over questions from last week?	Q+A 3	x				They are going to be answered on our website - we don't have time

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
This scheme will not be decommissioned, it will merely be updated, will the jointing cables be in concrete?	Q+A 3	x				Don't know about concrete, but don't think the scheme will go beyond 40 years
What are the benefits for the local communities?	Q+A 3		x			Access, supply chain, skills, business rates
Already a small solar farm in Burwell, why can't you put the solar farm there where there is no residential property?	Q+A 3	x				Methodology for site selection
Why is it this big?	Q+A 3	x				Need it for the environment
Employment- so you will just employ people for 2 years and then lose jobs for local farmers?	Q+A 3	x				Farming system is flexible, and hiring 900 people during construction
Will permissive paths replace footpaths, how will you ensure access for people?	Q+A 3	x				Will be secured under property agreements
Matt how big are the solar projects you run? Are they also ruining countryside?	Q+A 3	x				50 kw to 50 MW SF's and they are next to people's houses
Have you spoken to the people injured in the Arizona battery fire?	Q+A 3			x		Creating outline BSFMP
Why have you not postponed the consultation till we can meet face to face?	Q+A 3	x				Guidance saying keep going as we will need these projects to help the economy and didn't know about the vaccine
There have been several fires from BESS's, it is misleading to say these schemes are safe.	Q+A 3			x		Creating a fire risk safety plan for the DCO

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
I have solar panels on my roof and given their size can I deduce there will be 1.6 million solar panels?	Q+A 3	x				Panels have increased in capacity, Matt estimate 1.1 million
Have you considered the loss of biodiversity on the site? What do you have to show for biodiversity for the DCO?	Q+A 3		x			Have done extensive testing and in the PIER
What material will the underground cables be made of?	Q+A 3	x				A metal, wrapped in protective materials
After decommissioning of the panels, will they be updated with new panels?	Q+A 3	x				No, panels degrade 0.5% a year but can't see them replacing them
Under the compulsory purchase issue, you are acting as other infrastructure providers, I am aware in other large schemes funding has been made available for communities to access to improve local facilities, has this been considered and rejected?	Q+A 3	x				Considering how the scheme can provide benefits other than money- emphasis on skills and legacy benefits, don't know about that yet though
Also why is Sunnica relying on landowners to provide the benefits of paths?	Q+A 3				x	
This is a farce - avoiding us and stifling our voices and blaming it on Covid	Q+A 3	x				Put it in your consultation feedback.
Which species will lose the most through this scheme?	Q+A 3	x				Created specific mitigation sites and where there are impacts they will try to mitigate adverse impact and enhance biodiversity

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
The largest landowner in the scheme is also in the industry of solar, is this why you sited Sunnica here?	Q+A 3			x		Alternatives methodology for assessment in DCO
Do you think the UK's solar need could be met by using rooftops and not green land?	Q+A 3	x				No, we need lots more
If this goes ahead, will Matt and Luke be willing to put their money into charities to help the community they are damaging?	Q+A 3				x	No they won't but community benefits strategy may be considered
You will be releasing Carbon in construction. Seems like a waste of good farmland as we need to farm for food.	Q+A 3	x				Net emission reduction gain, need to find other land to farm, also providing food (through sheep)
Is it not true that the larger the scheme, the more money you will make? It isn't green after all	Q+A 3	x				We live in a capitalist society - so yes
What proportion of the jobs you create will be fulfilled by people from the villages your scheme most effects?	Q+A 3				x	3/4 jobs based on the 'travel to work' area assumption but just an estimate and will be decided by the contractor so no commitment
PIER states all traffic accessing East Site A through Worlington- already very busy, small junctions etc?	Q+A 3			x		Specialists will look at this at the next stage but so far it is assumed
You are saying the outputs of the farms you have but you aren't saying the areas covered?	Q+A 3				x	Doesn't know
Are you able to say how many people have attended the webinars throughout?	Q+A 3			x		Will be in consultation report

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
The electricity from the panels will go from the panels to the national grid or BESS's, will it flow back?	Q+A 3	x				Yes can export and import electricity
When the panels are delivered to site, how many panels can come in a single lorry?	Q+A 3	x				Come double stacked - four quads double stacked - 60 in a crate
Panel technology is advancing, therefore will you shrink this site and move it back from villages?	Q+A 3	x				No- in some cases they have set back panels 100's of meters from villages but are going to maximise grid connection
Before you decided to carry out the virtual consultation, how did you assess what proportion of the population would be able to access the online information?	Q+A 3	x				Had meetings with officers from local authorities, set up a working group, not just virtual, went out 10,500 copies of consultation and phone calls
Will the cable be cooper or aluminium, what will the wrapping be and how long will it take to decompose?	Q+A 3	x			x	Not sure if copper or aluminium, depends on pricing, wrapping will be protective sheath but depends on material
When you count your webinar - not all these webinar people are unique, every week, this will not be the total number of people engaged.	Q+A 3	x				Taken onboard and webinars are just one part of it.
Matts comment on inefficiency is misleading - they are not 50% efficient.	Q+A 3	x				This is talking about aging of the panels
What will happen to the substation extension at the end of the project? Will you sell it?	Q+A 3	x				Will be decommissioned, but if still working National grid might seek to maintain it if it is still operational

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
Skilled electricians have done 4-year apprenticeships and higher training, apprenticeships for the scheme would take 3-5 years and therefore very difficult, meaning low levels of training and low skill impact.	Q+A 3	x				Strongly push back on this- exciting feedback from West Suffolk college etc
Would you be considering building local recreational building such as gyms etc and run them from the power of your plant?	Q+A 3	x				No - they wouldn't be providing power to locals
Can you work with local owners to build a temporary access road from East Site A to B? So high traffic doesn't have to go through Worlington?	Q+A 3			x		Are still evaluating
How can you say legacy when the scheme will be decommissioned in 40 years/ will they then have to retrain?	Q+A 3	x				No can take skills elsewhere
This is not rewilding- that is resulting in bushes and trees, not mown grass.	Q+A 3				x	
I thought sustainability meant eating locally sourced food and not livestock?	Q+A 3	x				Some of the land already being used for livestock
There is already harm to Community - money and time spent and local anxiety and upset in the community- I don't see any local benefit.	Q+A 3				x	
Matt Hazel- which environmentalists encouraged you to build massive solar farms on agricultural land?	Q+A 3	x				David Attenborough, the news, etc

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
If you don't answer the Tilbrook Question about La Hogue then you are actively encouraging a boycott of them?	Q+A 3	x				Doesn't change anything
Do you have any interests in other solar farms of this scale in the UK?	Q+A 3	x				Luke - not that I want to discuss, Matt - yes
How can you live with yourselves, ruining the safe, beautiful environment we chose to live in to raise our children.	Q+A 3	x				Proud of what they do
We know the Walnut Tree junction is very narrow and Mildenhall to Burwell is already failing. Please can you make sure you don't bring gridlock to our streets?	Q+A 3			x		Will look into at the next stage
What is the lifetime of solar panels? And batteries?	Q+A 3	x				Over 40 years for panels, batteries will be 4/5 years
Matt who will be making these panels for you?	Q+A 3	x				Depends on technology provider
They are less than 150 yards from my house, the panels.	Q+A 3	x				That is a long way away
Would it be possible to import electricity when it is cheap and then sell it back when it is more expensive?	Q+A 3	x				Yes
You must admit that the substation might not be decommissioned if the grid wish to keep it?	Q+A 3	x				Yes, but the national grid would have to put in an application - Sunnica don't own the land.

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
We have increasing numbers of home workers, how will Sunnica ensure they will not disrupt internet and connectivity?	Q+A 3			x		These cables will be identified
The very obvious community benefit would be to keep the land as agriculture	Q+A 3				x	
Are you saying the pigs on the land at present will be allowed through the panels?	Q+A 3	x				Not pigs, too good at digging.
The community has not said it is against solar panels in the field, it is too big, too much guess work, it is like a big jigsaw puzzle.	Q+A 3				x	

From: [CHEADLE, Luke](#)
To: [Sunnica Energy Farm](#)
Cc: [FRAZER, Lucy](#); [HANCOCK, Matthew](#); [PEARCE GOULD, Harry](#)
Subject: LF-MH letter to Planning Inspectorate - Adequacy of consultation - Sunnica Ltd
Date: 03 December 2021 16:35:43
Attachments: [LF-MH letter to Planning Inspectorate - Sunnica Ltd.pdf](#)
[SNTS CAG AoCR 28Nov21_rev1.pdf](#)

Dear team,

Please find attached a letter from Lucy Frazer MP and Matt Hancock MP regarding the adequacy of the consultation undertaken by Sunnica Ltd.

Kind regards,

Luke

Luke Cheadle

Parliamentary Assistant / Caseworker

Office of Lucy Frazer MP

Member of Parliament for South East Cambridgeshire

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Sign up for Lucy's newsletter here: <http://eepurl.com/dAwNHD>

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Sent via email to Sunnica@planninginspectorate.gov.uk

Dear Planning Inspectorate,

We are writing regarding the adequacy of consultation stage of the development consent order (DCO) submitted by Sunnica Ltd for Sunnica Energy Farm. In this response we are not expressing views on the merit of this project - we have set these out elsewhere. This is solely about the inadequacy of the consultation undertaken by Sunnica Ltd.

Whilst we have not seen the final submitted proposals to the Planning Inspectorate, we understand that Sunnica Energy Farm will, if built, cross the boundaries of our constituencies of South East Cambridgeshire and West Suffolk, and will come into close proximity of a number of small rural villages, including Isleham, Kennett, Chippenham, Snailwell, Worlington, Freckenham and Red Lodge. Given the significant impact the project of such proximity will have on residents, we as constituency MPs, have engaged with Sunnica and residents regarding the proposals in recent years.

As part of our engagement with the process, we have significant concerns about the quality and the substance of the consultation process. Whilst we accept that due to the Covid-19 pandemic, Sunnica Ltd had to conduct their statutory consultation virtually, which as you will know took place between 22 September and 18 December 2020, we share the concerns of our constituents and the local authorities that this was not carried out effectively. We will touch further on this point later in our letter. However, we wanted to first express our concern that to the best of our knowledge Sunnica Ltd have not sought to engage our constituents in-person since all legal restrictions on social contact came to an end on 19 July 2021.

We are therefore surprised that when finalising their DCO submission that Sunnica Ltd did not believe it would be worthwhile to engage our constituents in person over the last few months ahead of their submission to the Planning Inspectorate on November 18th. Indeed, as constituency MPs, we held an open meeting with residents on Friday 15 October in Isleham, where we offered Sunnica Ltd the opportunity to send a representative to provide further details to our constituents on their updated plans before submitting their DCO application and answer any queries they may have. We were therefore extremely disappointed that they chose to decline this invitation. This was declined due to short notice; however, more than 200 residents from nearby villages made themselves available with 11 days' notice. Sunnica have been given chances to rectify this situation since, most recently in Red Lodge on Friday 26th November 2021, yet declined to attend again. I am sure you can appreciate that since Sunnica Ltd's proposals stretch across our constituencies, impacting resident's daily lives, during construction, build and decommissioning residents were very disappointed that Sunnica Ltd did not feel it appropriate to address them in-person. There is therefore a view locally that Sunnica's approach to the Open Meeting we held on Friday 15th October is typical for how the organisation has approached their consultation with residents about their proposals, throughout.

We are also concerned about Sunnica's willingness to provide details of their plans in a timely fashion. We understand the scheme boundary was modified during the statutory consultation (on 9 November 2020), whilst Isleham and West Row areas were added to the scheme boundary very late (additional land was added just ahead of the statutory consultation starting) so these villages did not realise the huge impact the new scheme boundary would have on their villages. The Sunnica website was not updated with these changes until the statutory consultation started. These villages therefore have effectively had no 'pre-consultation' or pre-warning about the new boundary and had very limited time to learn about the new scheme proposal, made even more difficult during the pandemic.

As constituency MPs for the site, we have not been briefed or been offered a briefing on any changes to the proposals put forward by Sunnica as part of their Development Consent Order submission, however, we understand from their website that some amendments have been made since the last consultation. Indeed, it states "*We have considerably reduced the degree to which our Scheme impacts on nearby communities as part of this process.*" We note that Sunnica Ltd deem that their proposals have changed "considerably" since their virtual statutory consultation (22 September and 18 December 2020). We understand that where proposals have been substantially altered, this can call into question the legitimacy of the consultation already carried out. As noted previously whilst we are not aware of the full extent to which Sunnica's proposals have changed but by their own definition they have changed "considerably". As constituency MPs for the proposed site, we therefore share our


constituents view that second round of public face-to-face consultation is required on the new proposals that Sunnica have submitted to the Planning Inspectorate.

Without wishing to repeat many of the points that West Suffolk Council and East Cambridgeshire District Council will be relaying as part of this acceptance phase, we share the concerns our constituents have outlined regarding the lack of access to information for residents, the quality and extent of the webinars Sunnica held, the lack of time to review information, Sunnica's unwillingness to provide further details about the Scheme during the consultation process and after. We are also concerned that Sunnica have not met their Statement of Community Consultation obligations, for instance they indicated that they would be seeking views on the PEIR, but this was not made available to all residents (only online, despite requests for hard copies to be made available), so many were unable to provide feedback. We have enclosed the Say No to Sunnica Action's Group response to the adequacy of consultation phase, which details our constituents concerns about how the consultation was undertaken in full.

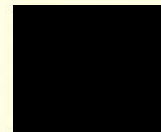
We would be grateful if the Planning Inspectorate would consider this response as part of the ongoing acceptance phase of the Nationally Significant Infrastructure Project process for Sunnica Energy Farm. As outlined above, we believe that Sunnica Ltd have failed to engage in a high-quality pre-application consultation with local communities, local authorities, and those who would be directly affected by the project. We are particularly disappointed that they refused to engage and meet with our residents directly, despite there being no legal restrictions on social contact since 19 July 2021 and we as constituency MPs provided them with a forum to meet with constituents and discuss the project on 15 October 2021.

We therefore believe that the consultation undertaken by Sunnica Ltd should be deemed inadequate, and should they wish to proceed, the applicant should undertake further face-to-face consultation, taking note of the criticism outlined by the local authorities before re-submitting.

Yours sincerely,



Lucy Frazer
MP for South East Cambridgeshire



Matt Hancock
MP for West Suffolk





SUNNICA ENERGY FARM

INADEQUACY OF PUBLIC CONSULTATION

SAY NO TO SUNNICA COMMUNITY ACTION GROUP

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2. Introduction

- 2.1.1. **Say No to Sunnica** is a local community action group (CAG), with volunteers from across the 16 parishes affected by the solar and battery plant proposal that is being applied for by Sunnica Ltd.
- 2.1.2. This report is not a representation about the Sunnica proposal; it focuses solely on the adequacy of the consultation process. The report has been written to assist the Planning Inspectorate and Local Authorities with assessing if the applicant's consultation has been adequate further to Section 47 of the Planning Act 2008. With respect to the applicant's duties under Section 49 of the Act these will form part of our written representations when invited.
- 2.1.3. Sunnica Ltd (Sunnica) in this report is taken to be Sunnica and it's agents/representatives.
- 2.1.4. Sunnica carried out a limited non-statutory consultation for their proposal in June/July 2019. Only preliminary information was available at that time, and the scheme boundary was quite different to that outlined in the Statutory Consultation, which ran between 22nd Sept - 18th Dec 2020, during the escalating Covid pandemic and second national lockdown.
- 2.1.5. The Statutory Consultation has been described by District and County Councillors as "woefully inadequate". Primarily, the consultation took the form of a 'high level' booklet that was distributed to households in some of the villages affected by the scheme. This was supported by online-only information, which was highly technical and not accessible to all. There were no public 'in-person' discussions, and there were no physical displays - manned or unmanned - in the affected areas. Public webinars were arranged but these took the form of a monologue by Sunnica followed by questions that had to be put in writing using the chat function, with no two-way dialogue.
- 2.1.6. Whilst we appreciate that during the Covid pandemic, virtual consultations were permitted, we feel very strongly that additional regard **MUST** be made to the guidance notes issued by the Planning Inspectorate to ensure that consultations undertaken during such unprecedented conditions are as inclusive as possible, and that they allow on-going fair participation.
- 2.1.7. Responding to the pandemic the Government passed the Infrastructure Planning (Publication and Notification of Applications etc.) (Amendment) Regulations 2020 which

came into force in July 2020. These regulations provided for physical documents being available locally to be replaced by a website. Government guidance on how information sets out that applicants should ensure the relevant website is well signposted when publishing their notices and that the documents are readily accessible, i.e. documents should be clearly named and logically structured. Guidance also requires that hard copies of any relevant documents must be provided on request. This guidance applies to depositing of physical documents being replaced by placing on a website, it should not be taken to replace exhibitions and meetings where safe to do so.

- 2.1.8. Sunnica's Statutory Consultation did not adhere to this guidance and did not comply with their Statement of Community Consultation (SoCC).
- 2.1.9. Consultation, by definition, implies discussion. The exchange of thoughts to refine an outcome. This is key to the public consultation process in the Planning Act 2008 (The Planning Act). This report highlights the lack of opportunity for public, two-way discussion during, and after, the Statutory Consultation. It provides an overview of the flaws that were brought to our attention by residents through direct communications, as well as surveys that we have undertaken (Appendix 1).
- 2.1.10. It should also be noted that these failings in consultation were highlighted to Sunnica by the CAG and Parish Councils during and after the non-statutory consultation, as well as in the run up to the Statutory Consultation, and during the early weeks of the Statutory Consultation period. Residents wrote letters to Sunnica explaining why the consultation was not working effectively, suggesting improvements that could be made to enable fair participation to more residents and to allow a better assessment of the impact.
- 2.1.11. Councillors and local MPs also contacted Sunnica, expressing the same concerns.
- 2.1.12. During the webinars, residents used the chat function to suggest improvements to the way the consultation was being handled and to express difficulty accessing material etc.
- 2.1.13. Sunnica Ltd had ample time to react and make amendments to the way their Statutory Consultation was being carried out. They did not react and persevered with an ineffective consultation methodology. We feel that the application cannot be accepted at this stage as the requirement for adequate consultation has not been met.

3. Why The Consultation Was Inadequate

3.1. Confusion about Location of the Scheme

- 3.1.1. The Sunnica consultation material gave the impression that the scheme was in Cambridgeshire. In fact, the scheme is in West Suffolk and East Cambridgeshire. Many residents in Suffolk would not necessarily have recognised the impact on them from the advertisements that Sunnica displayed in newspapers.
- 3.1.2. This confusion arose as the scheme was described as a “Solar Energy Farm and Battery Storage Facility Connecting to the Burwell National Grid Substation in Cambridgeshire.” The immediate conclusion is that a) the scheme is at Burwell and b) it is wholly in Cambridgeshire. An extract from the SOCC is shown in Figure 1, but the same description is also used in the Statutory Consultation booklet. Figure 13 shows a newspaper advertisement run in the local newspapers that only refers to “Connecting to the Burwell National Grid Substation in Cambridgeshire”. The statutory advertisements correctly referred to “located near Chippenham and Snailwell in Cambridgeshire, Isleham in Cambridgeshire and Suffolk, and Worlington and Freckenham in Suffolk” but these are unlikely to be read widely.
- 3.1.3. The primary impact of the scheme is not at Burwell. The other local communities are not mentioned in the Consultation booklet until page 6 and even then they are listed under a banner heading that refers to Burwell. Only on the small-scale environmental plans are Cambridgeshire and Suffolk mentioned.
- 3.1.4. People typically do not read past the introduction if they feel that the scheme does not relate to them, and the introduction failed to identify the precise location of the scheme. A small-scale plan opposite the Introduction in the consultation brochure lacked context, did not identify local waypoints and landmarks, and lacked a north point. All community names are in grey text, hard to read and lacking contrast for people with restricted eyesight. No information was provided in the brochure as to the availability of large text versions or where audio described versions could be obtained.
- 3.1.5. Given the emphasis on Burwell, a location where there are already a number of operational solar farms and proposed solar farms, a casual reader from any of the impacted communities might be forgiven for assuming the Sunnica scheme did not affect them.

Introduction

We're inviting feedback from local people on our proposals for Sunnica Energy Farm.

Sunnica Energy Farm is a proposed new solar energy farm and battery storage facility connecting to the Burwell National Grid Substation in Cambridgeshire.

FIGURE 1 - EXTRACT FROM SOCC

- 3.1.6. The vast size and scale of the Sunnica scheme (around 2500 acres) was also not highlighted in the consultation material. This would have enabled distinction between this and the other smaller solar farms (of which we have over 20) in this area. There was nothing in the scheme descriptions offered by Sunnica to make it stand out from these other schemes, or to indicate the significance of the proposal.
- 3.1.7. On the front cover of the consultation booklet (Figure 2) there was no indication that the scheme was a large-scale project and NSIP, when most solar energy schemes locally occupy a few fields. As a result, many residents looked at the front cover and no further, not realising the significance of the proposal to them. It was misleading and actively disengaged people from participating further.

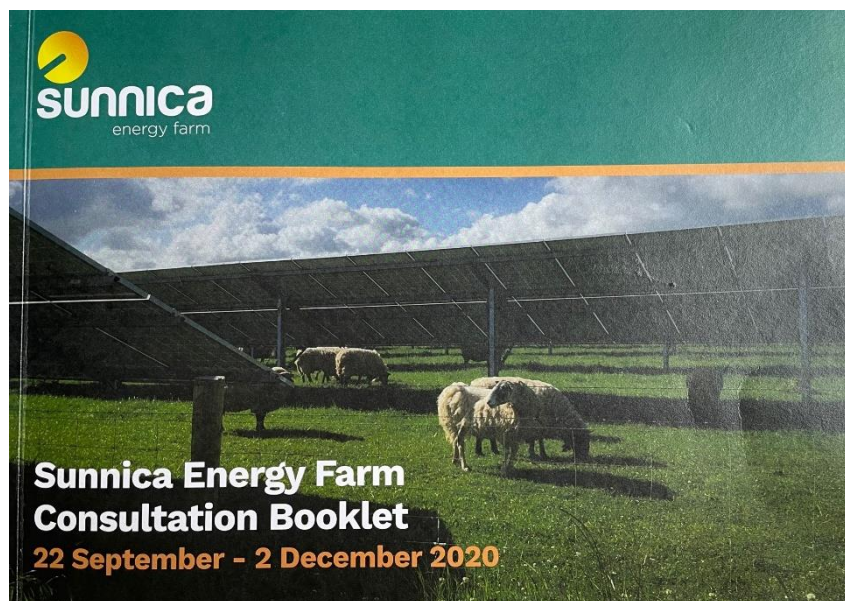


FIGURE 2 - COVER OF BOOKLET

- 3.1.8. Feedback presented to Sunnica following their poorly attended non-statutory consultation meetings included the fact that their non-statutory consultation information had been posted out to properties in plain envelopes addressed to "The Resident." At the time of the non-statutory consultation, many people had taken these to be "junk mail"

and they discarded them without reading (as an example:



3.1.9. Despite this feedback, Sunnica’s Statutory Consultation booklets were delivered in exactly the same way - plain white envelopes addressed to “The Resident” without any mention of Sunnica or the important content on the outside (including the return address). One resident who lives on Sun Street in Isleham, commented that she had put it straight into the recycling pile as she didn’t realise what it was. Others may well have done the same.

3.2. Confusion about the impact on Isleham

3.2.1. Just over 3 weeks before the start of the Statutory Consultation, the local press coverage was as follows (Figure 3):

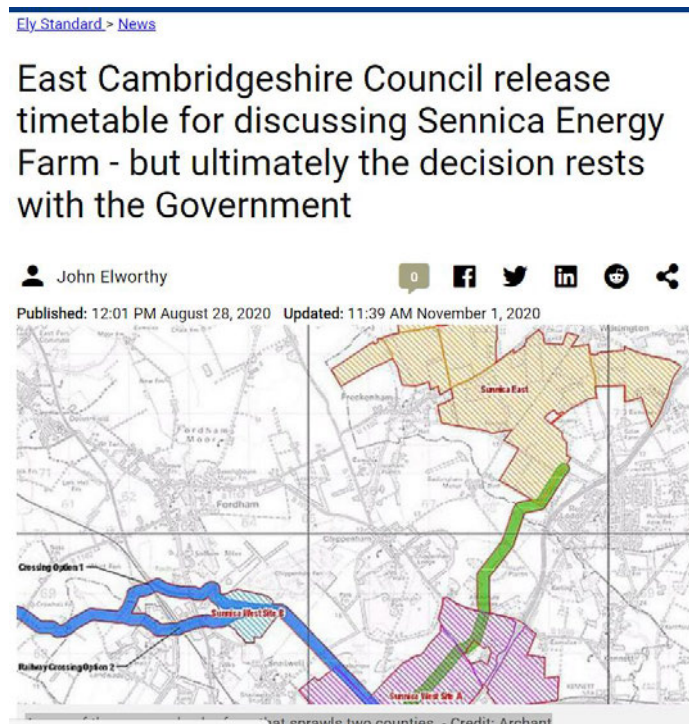


FIGURE 3 - PRESS ARTICLE

3.2.2. The article shows a different scheme boundary to the one proposed by Sunnica in the Statutory Consultation, causing confusion.

3.2.3. In the article, which included quotes from Luke Murray of Sunnica Ltd, it was stated that the scheme area covered 3 sites (yet 4 sites were presented during the Statutory Consultation). It was also stated that, “Villagers such as Isleham, Chippenham and Kennett are mainly affected with a cable route connecting to Burwell Electrical Sub

Station”. The author of the article said that he had taken this information from the Sunnica.co.uk website. For such a significant project it was incumbent on the promoter to ensure that local media was correctly informed and briefed.

- 3.2.4. The scheme map and these statements are inaccurate and misleading.
- 3.2.5. This uncorrected press coverage, combined with the inadequate scheme descriptions presented by Sunnica Ltd, meant that residents in Isleham did not immediately recognise the direct impact that this scheme would have on them when they received their Consultation Booklet a few weeks after this article was published.
- 3.2.6. The land area surrounding Isleham was added late to the scheme (because of the landowner near Freckenham withdrawing from the proposal and being replaced by a landowner from West Row). The revised scheme boundary was not widely publicised nor updated on the Sunnica.co.uk website in a timely manner. The materials in circulation at that time were conflicting and confusing. As such we feel that the Statutory Consultation was prejudiced against the residents of Isleham. The first updated glimpse of the scheme was only presented when the Statutory Consultation began.
- 3.2.7. This issue was highlighted to Sunnica during the early consultation webinars, and it was thought that some additional consultation activity in Isleham might be forthcoming. But nothing happened.
- 3.2.8. A motion that was passed in July 2021 by Cambridge County Council stated that,

“It is disappointing that communities including Isleham were included late in the initial round of consultation, and that COVID restrictions in force at that time limited the nature of the consultation that could be undertaken.”

Note: One of the non-statutory consultation meetings was held at the Beeches community centre in Isleham in 2019. However, this was poorly advertised and poorly attended, and the scheme at the time was sited further away from Isleham so the village was less impacted.

3.3. Poor Consultation Material

- 3.3.1. Residents reported how difficult it was to understand the maps etc in the consultation booklet, which was the primary form of consultation. The printed size was very small, maps were unclear/ difficult to read, no scale or scale bar was provided to assess size. It

was impossible for those trying to measure distances between the scheme boundary and their homes to obtain an informative answer.

- 3.3.2. Many of the maps in the booklet and on the website had no written markings or reference points, so the reader could not establish exactly which area was being shown. Context was lacking. None of the maps had a compass marking North, as is standard practice.
- 3.3.3. The plans on pages 9 and 11 of the booklets (example in Figure 4) are the only plans provided by Sunnica to indicate the proposed solar panel locations. But no settlement names or key features are shown, meaning that any reader would need to be a competent map reader to try to establish how the scheme related to them. The term ‘parameter plan’ is a technical term used in planning and would not communicate any significance to residents. An alternative title may have attracted attention rather than leaving the reader to work out what the plans represented.
- 3.3.4. Similarly, the maps shown in Figure 5 outlining the proposed BESS locations also have no place names or reference points. The BESS locations could be anywhere. Many residents did not realise the impact of the BESS compounds on them as a result.
- 3.3.5. Government guidance¹ on consultations sets out that consultations should use plain English and easy to understand and easy to answer. Lengthy documents should be avoided. The PEIR was a substantial document.
- 3.3.6. Small font size was used in the booklet, making it difficult for visually impaired residents to interpret. Had enlarged maps, with reference points on them, been on display in the village halls, ideally with experts available to help interpret them, these would have been much easier to follow.
- 3.3.7. In a CAG survey, residents were asked how easy it was to visualise the scheme based on the information provided by Sunnica. 67% said that it was difficult. A further 21% said ‘other,’ with reasons ranging from not having received a booklet (most common) or comments about the maps being tiny and difficult to interpret and the booklet containing “random pictures” and lacking important information and details.

1

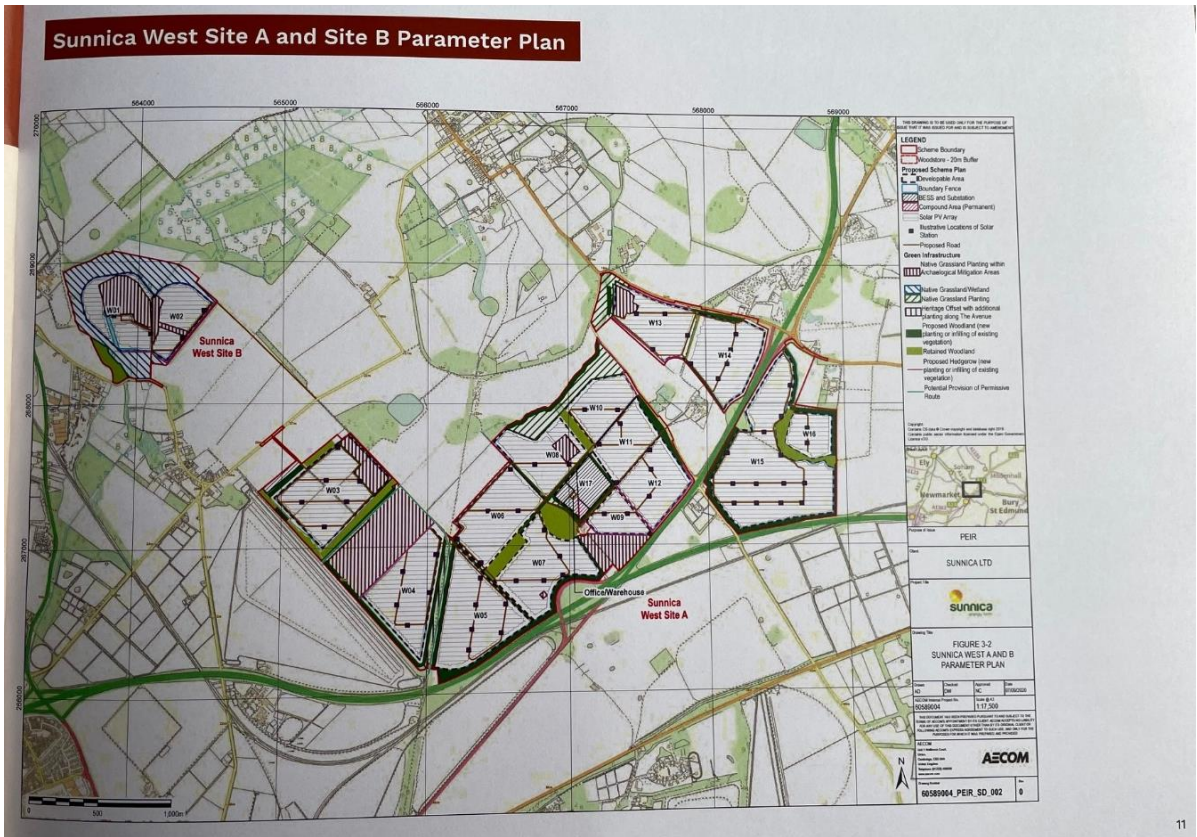


FIGURE 4 - EXAMPLE SITE PLAN

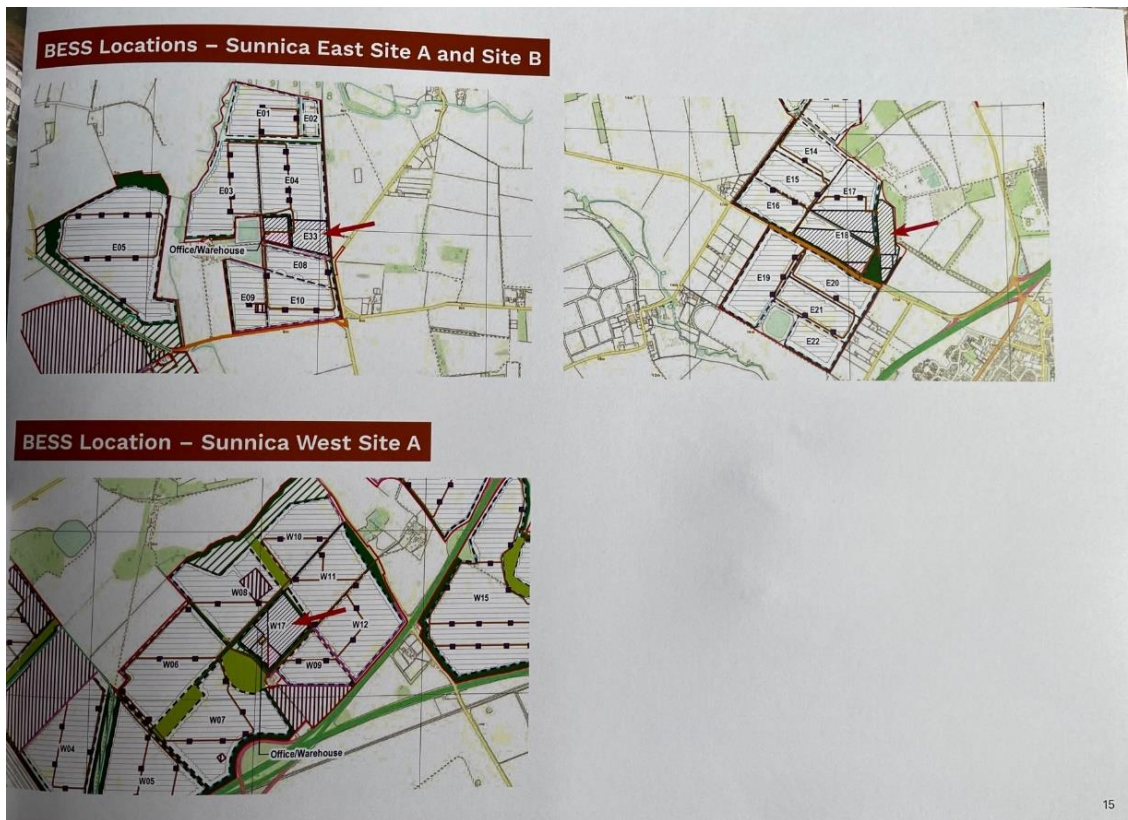


FIGURE 5 - BATTERY STORAGE LOCATIONS

- 3.3.8. Technical terms such as ‘parameter plans’ and ‘red line boundary’ repeatedly used throughout the material provided, but with no explanation as to what these mean. The booklets largely reproduced technical planning drawings and made no effort to use non-technical artwork easier for a lay person to understand. This made the material less accessible and less easy to understand.
- 3.3.9. Sunnica made further changes to the scheme boundary during the Statutory Consultation period and during the second national lockdown (5th Nov-2nd Dec 2020). These revisions were not made clear, causing further confusion about the scheme. Unconfirmed reports of changes to access points, changes/ closures public rights of way, etc spread around the villages. All of this was avoidable had Sunnica communicated more effectively with the parishes.
- 3.3.10. In June/July 2021, over 6 months after the Statutory Consultation had closed, residents of several villages contacted the CAG saying that they had received letters from Sunnica with scant details about potential compulsory purchase or compulsory access to their properties, causing considerable distress and confusion. These people proceeded to contact Sunnica to request additional details and to clarify their plans. In some cases, (e.g. a resident of Isaacson Road in Burwell) they received no reply from Sunnica and had to request their local MP to intervene on their behalf. In other cases, even when a response was received, insufficient detail was provided on which they could realistically feel ‘consulted’ about the impact to their personal property (e.g. █████ of Chippenham). This is indicative of the lack of awareness of the scheme in the local communities, and the lack of communication and consultation with impacted landowners.
- 3.3.11. Landowners have a right to know the likely extent of compulsory purchase during the consultation, and approximately how much of the land has been secured by Sunnica and what is remaining. This also impacts the way that communities feel about the scheme, how realistic they consider it to be and ultimately how much time they devote to participating in the consultation.
- 3.3.12. Sunnica made multiple changes to the timelines for their application. Residents were told by Sunnica during the Statutory Consultation that they expected to submit their application to PINS in “Spring 2021”. This time passed and May 2021 was proposed. Because Sunnica omitted to keep residents up to date with these submission date changes, the CAG engaged with the local authority planning officers at this time to clarify

when the submission would be. They were told: early July 2021, then early September, then late September, 12th November and finally 18th November 2021.

- 3.3.13. These delays and lack of communication by Sunnica led to much confusion; residents started to assume that the scheme had already been granted approval. For example, in Burwell (one of the largest villages), people saw cables being laid (for other non-Sunnica projects) and work at the substation being carried out, which they assumed was the start of the Sunnica building work. Fields surrounding the other villages had excavators in place and trenches being dug – so people thought that the installation was already underway.
- 3.3.14. The local authorities also pressed Sunnica to engage with communities (e.g. planning officers stating in May 2021, “*We have encouraged Sunnica to update the community in respect of progress with their application preparation and we will continue to press them on this.*”). But this was not acted upon.
- 3.3.15. Eventually, Sunnica released an update leaflet late in August 2021 stating that the application would be submitted in Autumn 2021.
- 3.3.16. This lengthy delay and poor communication on the part of Sunnica has led to misinformation being circulated about the scheme and a feeling that it’s a ‘done deal’ and that residents no longer have a say. With the Covid-19 restrictions easing, Sunnica could easily have held a few update Q and A sessions in the villages to alleviate people’s concerns and ensure they were aware of the revised timings and what the next steps would be.
- 3.3.17. Even as recently as October 2021, Sunnica refused to engage with residents to ease this confusion. Two local MPs, Matt Hancock and Lucy Frazer, held a joint meeting in a local village hall and asked Sunnica to come along to answer questions. They declined. The MPs contacted them a second time, indicating that at least 200 residents were expected at the meeting (around 250 actually turned out), so it would provide an excellent opportunity to answer questions about the scheme. They declined to attend once again (Figure 6).
- 3.3.18. The headline of the article in Figure 6 accurately reflects the way that residents feel they have been treated throughout the entire consultation period, and even afterwards. Matt Hancock, called Sunnica out as being arrogant for not entertaining the idea that they needed to take part in community engagement.



FIGURE 6 - NEWMARKET JOURNAL OCTOBER 2021

- 3.3.19. Confusion about timelines was exacerbated by Sunnica not keeping its website updated with changes. As of November 2021, Sunnica had still not added the revised timelines that were indicated in their update leaflet from late August (i.e. submission in Autumn 2021). It still stated that the submission will be in Summer 2021 (which is contrary to "Spring 2021" shown on pg. 34 of the consultation booklet).
- 3.4. Inaccessible Information, Discriminatory Consultation, 'Missing' Consultees
 - 3.4.1. Consultations on schemes of this size and scale should be made accessible to as many residents as possible. Not all residents in the affected areas received the consultation booklet. Sunnica stated that they had distributed around 11,000 booklets. However, the CAG had to contact Sunnica several times to request additional copies, as did several Parish Councils, to distribute to those missed by Sunnica.
 - 3.4.2. There appears to be a discrepancy with the amount of booklets sent out by Sunnica. Based on census population estimates in Consultation Zone 1 (ca. 30,000), and using ONS average occupancy (2.4 residents per household), it could be expected that more copies should have been distributed. Sunnica claim to have written to 11,048 addresses which doesn't appear sufficient.

- 3.4.3. In a CAG survey of residents in Consultation Zone 1, 40% (229 of the 579 responders) said that they had *not* received a consultation booklet.
- 3.4.4. The SOCC established Consultation Zone 1 as being, “Any person or group likely to have a direct interest in the proposed Sunnica Energy Farm.” Yet this Zone excluded Newmarket and Mildenhall. These are significant population centres, of which a large proportion work in Zone 1 (especially true for the horse racing industry). Many from these towns also have a recreational interest in the area and travel through it routinely. Only in Zone 1 were all addresses written to.
- 3.4.5. The CAG is still being contacted by communities who have only just become aware of the scheme, almost a year after the Statutory Consultation closed. For example, residents of the site owned and permanently occupied by members of the traveller community, who live on Elms Road, adjacent to scheme boundary and the largest BESS site on Sunnica East B. This traveller site is well established (the owners applied for planning permission in 2017, which was granted) and well known in the area. It is impossible not to see the site from Elms Road. This community received no Statutory Consultation booklets and no details about the scheme. According to one district councillor, Sunnica relied on out-of-date records to establish residential areas, which could explain why this land (and other examples) was assumed to be unoccupied.
- 3.4.6. The travelling community has been unable to take part in any consultation at all, despite being significantly affected by the proposal and less than 200m from the BESS compound. They have the same rights as anyone living in a house.
- 3.4.7. The travellers wrote to planning officers on 18th Oct 2021 stating they had not been consulted about the Sunnica scheme. They had recently heard about it from a neighbour. On 5th Nov 2021, Sunnica put a stake in the ground at the end of the drive leading to the site, to which they had pinned a letter and a consultation booklet. They did not walk up the drive to meet with the community or to provide an outline of their plans. There was no time for meaningful consultation before the application was submitted on 18th November 2021.
- 3.4.8. We are aware of other public consultations in this region where there have been sites occupied by the traveller community. In these cases, developers wrote to each caravan plot number. Sunnica did not do this.

- 3.4.9. Another resident along Elms Road in Freckenham also contacted us stating that their home had been mistakenly classified by Sunnica as uninhabited/ unoccupied.
- 3.4.10. The Shores Trust, a local charity owning land impacted by the scheme, were also not properly consulted. Sunnica had been notified of the charity's address and ownership of the land by the board of Trustees. Instead of writing to their registered address, Sunnica, pinned a consultation letter the gate of their land outlining their interest in the land. The charity found this by chance and wrote to Sunnica, re-iterating that they had already provided Sunnica with their address and, in future, please could they write to them at that address instead of pinning notices to gate posts. Following this exchange, Sunnica did write to them at their registered address but still omitted to provide sufficient detail about their plans on which they could realistically be consulted.
- 3.4.11. Many people subject to this late round of consultation where alterations to highways and junctions for construction access were proposed, received only a small-scale plan showing the revised red line boundary. It was necessary to compare these with previous plans in the brochure to see the sometimes very small difference, but then be left not knowing what the difference was for. In some cases land was required for these changes.
- 3.4.12. Sunnica Ltd should have carried out research regarding the populations of the villages in their 'Consultation Zone 1'. This would have enabled them to recognise that a significant proportion are senior citizens (e.g. approx. 29% in Isleham, 27% in Worlington, 24% in Freckenham etc. *Source ONS*). A large proportion of these senior citizens either do not have access to a computer, or they are not very computer literate so were unable to access the online information or webinars. Indeed, in some areas around Isleham, there is currently no internet connection at all, so these residents were also unable to access the online information. The Covid-19 pandemic highlighted that there are many families here who do not have laptops/ computers (shown by the difficulties accessing home school work during the lockdowns). This is discriminatory against part of the population.
- 3.4.13. The CAG survey showed that 51% of residents were not aware of the additional information online or that they could not access it.

3.4.14. The Consultation Institute – Consultation Charter² sets out Best Practice for consultation. Among the seven core principles is “*Consultees must be able to have reasonable access to the exercise. This means that the methods chosen must be appropriate for the intended audience and that effective means are used to cater for the special needs of ‘seldom heard’ groups and others with special requirements*”. Also “*New technology and social media offers an ever-wider choice of consultation mechanism, but consultors must always ensure that the ‘Digital Divide’ does not disenfranchise citizens or stakeholders*”.

3.4.15. In view of this, the Sunnica Statutory Consultation booklet should have been supported not just by online information, but also by physical displays in the parishes (e.g. mobile displays or fixed displays in the village halls with enlarged maps etc), as indicated in PINS Guidance on procedural requirements for major infrastructure projects:

“Applicants should engage proactively with local authorities and local communities to find alternative means to provide access to the documentation where required, to ensure on-going fair participation in the planning process, for example by providing copies of documents on a USB flash drive where parties have access to a computer but have limited or no internet access or, where reasonably practicable, by making copies of documents available for inspection free of charge where a person is unable to access the documentation electronically or finds it difficult to do so.”

3.4.16. In-person meetings were possible in a Covid-secure manner during the first 6-7 weeks of the Statutory Consultation period, as evidenced by the farmers markets in Freckenham and Isleham, village neighbourhood plan consultations, etc. There are numerous large halls in community centres, sports hall etc in this area, so plenty of opportunity for ‘ticketed’ events with adequate social distancing could have been achieved. Or even outdoor events in the earlier weeks of the statutory consultation period.

3.4.17. Sunnica did not come to the villages at all during the Statutory Consultation, unjustly citing Covid-19 restrictions as the reason for this choice. Not only did the lack of any

² [REDACTED]

physical meetings exclude members of the public who would have engaged with a physical consultation, but it also exacerbated the confusion surrounding the proposal.

3.4.18. Prior to the start of the Statutory Consultation period, district and county councillors asked Sunnica to come to the villages to answer questions, but they declined (Figure 7). Residents asked Sunnica several times during the consultation webinars to come to the villages, but they declined this too.

3.4.19. Comments made by Suffolk councillors during the Statutory Consultation period included, *“At this stage of the process we have many questions to which the answers are not entirely clear”* (Figure 8) and that *“impacts on highways and transport need to be evidenced more clearly.”* Residents and other key stakeholders cannot be expected to be consulted on impacts during construction and operation etc if there is so little information forthcoming.



FIGURE 7 - ARTICLE ON SUNNICA NOT COMMUNICATING

3.4.20. Despite MPs, residents and local councillors asking Sunnica to come to the affected areas to talk to communities, they declined (Figure 8 and Figure 9)

3.4.21. This gave the impression that Sunnica felt they could inflict a scheme of this size and scale on local communities without adequately engaging with them. One district councillor

criticised *“the ‘cynical premise’ of Sunnica who, he felt, might not feel the need to consult locally since the decision was not being taken locally.”*

3.4.22. Not only has this caused much anger and upset, but it also set a prejudice in the villages that it was not worth participating in the consultation as their voice would not be heard.

3.4.23. Local MP, Matt Hancock, commented, *“We should make the case about not enough consultation having been done, notwithstanding whether you think this is a good idea or not.”*

“This will not be the case for residents of Worlington and Freckenham who have said that although they are not opposed to solar power they do not want to live inside a power plant.”

Councillor Rachel Hood added: “On behalf of West Suffolk residents I do want to highlight that the size of this proposal is monstrous.

“2,750-plus acres is completely inappropriate and the amount of solar energy that will be provided is a fraction of what would be provided if it was in a more suitable place, i.e. not in the middle of Suffolk that doesn’t get that much sunlight.”

The councils’ responses have called for more information on the impact it will have on climate change emissions, archaeological investigations required, mitigation for wildlife species, flood considerations and visual impact.

The responses said that the “assessment of impacts on the economy is flawed” while the “impacts on highways and transport must be evidenced more clearly”.

Suffolk County Council cabinet member for the environment, Richard Rout, said: “At this stage of the process we have many questions to which the answers are not entirely clear, so it’s appropriate at this stage to take these issues to the developer.”

He added: “The sheer scale of the project means its impact will be significant and very far-reaching.

[MORE: Villagers prepare to fight solar farm plans](#)“It’s our view that the largest solar project in the UK should take an exemplary approach to mitigating its impact on the landscape, so much more work is necessary.”

As a nationally-significant energy project, the government will make the final decision, with the development consent order expected to be submitted to the Planning Inspectorate from spring next year.

FIGURE 8 - EADT 11 NOVEMBER 2020

Growing concern from residents consultation about massive solar scheme set to surround villages just outside Newmarket is not good enough

By Dan Barker - dan.barker@liffepublishing.co.uk

Published: 05:00, 29 November 2020

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There is growing concern from residents that a consultation into a 2,800 acre solar farm which will surround villages just outside **Newmarket** is not good enough.

Under controversial proposals from Sunnica, the sprawling facility will cross both East Cambridgeshire and West **Suffolk** and stretch from a substation in Burwell to Snailwell, Newmarket, Freckenham, Worlington and Isleham.

And now West Suffolk MP Matt Hancock, whose rural constituency will be changed for the next four decades if the plans are approved by his government, has told worried residents in an online meeting that if the proposals don't change, it should be opposed.

FIGURE 9 NEWMARKET JOURNAL 29TH NOV 2020

- 3.4.24. Another district councillor stated that Sunnica had not had any discussion with 3 of the Parish Councils in their ward (and within 'Consultation Zone 1') in the lead up to the statutory consultation, which contradicts claims by Sunnica in the SoCC (Figure 11 and 11) that Parish and Town Councils in Consultation Zone 1 would be engaged.

The ways in which our early engagement has influenced our approach to consultation include:

- Ensuring consultation activity includes Snailwell and Kennett
- Targeted advertising through the local press including adverts in the Ely Standard and East Anglian Daily Times
- Engagement with parish and town councils in the vicinity of the proposed Sunnica Energy Farm between periods of consultation
- Consulting with groups that have a particular interest in public rights of way such as The Ramblers and bridleways groups

FIGURE 10 SOCC ENGAGEMENT WITH PARISH AND TOWN COUNCILS

Table 3: consultation publicity and techniques

Zone	How we will publicise consultation within this zone	How we will consult within this zone
1	<ul style="list-style-type: none"> • Writing to all addresses within consultation zone 1 • Writing to elected representatives, <u>parish</u> councils and community groups within the zone with details of the consultation • Sharing a consultation information pack designed to support stakeholders promoting consultation through their own existing communication channels such as social media feeds with local authorities, parish councils and community groups within the zone • Publicising the consultation in the following newspapers circulating in the consultation zone: the Newmarket Journal, the Cambridge News, Bury Free Press, the Ely Standard and the East Anglian Daily Times. • Publicising the consultation via regional and local broadcasters including BBC Radio Cambridgeshire, BBC Suffolk, BBC Look East • Advertising the consultation on social media • Publishing details of the consultation online at www.sunnica.co.uk 	<ul style="list-style-type: none"> • Sending a copy of a consultation booklet providing a non-technical overview of the proposed Sunnica Energy Farm, the BA process, the consultation and planning process, how to take part in the consultation, and proposed next steps to all addresses in consultation zone 1. • Inviting enquiries and responses online through the consultation website, by freephone, freepost or email. This will provide a variety of means for consultees to respond in a way convenient to them. • Hosting a virtual public exhibition on the consultation website. • Hosting webinars which will include a presentation regarding the proposals and an opportunity to ask questions. • Inviting elected representatives to take part in briefings through a digital meeting. • Inviting residents of consultation zone 1 to book an individual

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FIGURE 11 SOCC LIST OF WHO WILL BE CONTACTED BY SUNNICA

- 3.4.25. Nicholas Wright a Parish Councillor for Chippenham confirms that his parish council did not have any specific approach by Sunnica to discuss any part of the scheme before, during or after the consultation period. Sunnica relied entirely on their brochures and website and did not meet with key stakeholders even virtually.
- 3.4.26. One further organisation, the Ark Church, based to the Southeast of Isleham, were not consulted. Neither as an organisation or members individually (congregation of around 400 people). The Ark Church is less than 400m from the proposed development and is a prominent building of architectural significance, in a setting significantly impacted by the development.
- 3.4.27. The Preliminary Environmental Impact Report (PEIR) was an essential part of the consultation since it contained more details about the proposal (the Consultation Booklet only gave a superficial overview of the scheme and, as such, did not enable people to assess the impact that it would have on them). The PEIR is listed in the SoCC as one of the items that Sunnica will be requesting views on (Figure 12). However, it was not made readily available to all.
- 3.4.28. Only those who were able to access the online consultation information were able to view the PEIR. Alternatively, those that could afford to pay over £315 to obtain a personal

copy (Sunnica asked for 35p per sheet; it's a 900+ page PEIR document). The charge was an obstruction to effective consultation as material that was deemed necessary by Sunnica to understand the proposals could only be obtained by paying for it.

- 3.4.29. Based on the population distributions of the affected parishes, this meant that around a quarter to a third of residents were unable to give their views on the PEIR, simply because it was inaccessible for those less computer literate or without computer access.

What will be consulted on?

During the statutory consultation, we will be asking for views on:

- The proposed Sunnica Energy Farm
- The short term and long term impacts of the proposed Sunnica Energy Farm including:
 - Construction impacts
 - Environmental impacts
 - Operational impacts
 - Impacts from decommissioning
- The PEIR

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FIGURE 12 - PEIR LISTED IN SOCC FOR CONSULTATION

- 3.4.30. Recognising this omission, the Parish Councils requested that Sunnica provide hard copies of the PEIR to be made available in the villages. Sunnica were also asked to do this several times by residents during the early consultation webinars. This would have been a reasonable compromise to assist with effective consultation.
- 3.4.31. Sunnica responded slowly, first commenting in webinars that they would “look into” providing hard copies in villages and then indicating that they would supply them to the Parish Councils. By this time, several weeks of the Statutory Consultation period had elapsed.
- 3.4.32. Further confusion resulted in Parish Councils having to formally ask for PEIR copies, in addition to their previous requests during webinars. Three of these Parish Councils formally requested a hard copy of the PEIR by email and they received it. One further Parish Council requested a copy and sent several email reminders to Sunnica – they eventually received a copy in December just before the consultation closed. Two further Parish Councils that requested a copy did not receive anything. Other Parish Councils had assumed, based on Sunnica’s confusing comments during the webinars, that a copy of the PEIR would be sent to all Parish Councils in Consultation Zone 1, but this was not the case and they did not receive it.

- 3.4.33. In addition, where Sunnica did supply a hard copy of the PEIR, it was not a full version - just the main body of the document minus the appendices, which contained important details about the scheme. Government guidance is clear: relevant documents must be provided on request. The Appendices are relevant documents and they were not provided on request.
- 3.4.34. Given that the PEIR was (by Sunnica's own admission) such a vital part of the consultation it should have been made available, in full, in all towns and villages from the very outset of the Statutory Consultation period.
- 3.4.35. The inaccessibility of the PEIR was also reflected in a CAG survey. When asked, "*Were you able to access the information in the PEIR (preliminary environmental information report)?*", 91% of the 556 responses stated that they were unaware of the PEIR or unable access it. An extraordinarily high proportion of people were unaware of or unable to access key documentation. They have not complied with the SoCC.

3.5. Ineffectiveness of Webinars

- 3.5.1. The Sunnica online webinars were poorly advertised, and thus poorly attended. They were noted in small print on the back of the consultation booklet and in a small number of newspaper adverts (Figure 13). The newspapers chosen for advertising these were not always in the local area and are not so widely read by the local population here. In the modern age advertisements in newspapers, although required by law, are ineffective due to declining print readership. Other channels should have been used to advertise, not just the minimum required by law.
- 3.5.2. In a survey (Appendix 1) only 5% of respondents considered the webinars an adequate replacement of physical meetings and exhibitions. Some 60% of those surveyed did not attend the webinars.
- 3.5.3. No advertisements were placed on local village Facebook groups or in local village magazines, which are much more widely read and followed. A CAG survey indicated that 65% of 562 responders were unaware of the webinars. Social media users are highly likely to engage with online content, and the opportunity was lost to mobilise this group of the population.

- 3.5.4. Residents had to have access to a computer or device to register and, of course, listen to them. Previous comments in this report show that a significant proportion of residents here did not have these facilities and so were excluded from the webinars. Given that the webinars were to replace the dialogue that would normally take place in person, this gap was not effectively filled.
- 3.5.5. During the first series of 6 webinars, between 12-21 people joined. This is in stark contrast to the attendees of video conferences held by councillors and MPs during the statutory consultation period (over 100 attendees), and with the joint meeting by MPs Lucy Frazer and Matt Hancock in October 2021, when the village hall was packed with over 250 residents (more had expressed interest in going had it not been held during the working day). The overwhelming majority of residents here feel passionately about the impacts of this scheme on them, and this was not reflected at all in the webinar attendance.



FIGURE 13 - NEWSPAPER ADVERTISEMENT IN BURY FREE PRESS

- 3.5.6. Figure 13 shows an advert in the Bury Free Press. Bury St Edmunds is around 15-20 miles away from the scheme area, so adverts placed in this paper were not especially relevant to the affected communities.

- 3.5.7. The Statutory Consultation started on 22nd Sept 2020 but the first webinar did not take place until 1st October, over 1 week into the consultation period. This was followed by 5 further webinars between 3rd and 17th October. This first series of 6 webinars was then repeated.
- 3.5.8. During this timeframe, and up to 5th November 2021 (when the 2nd national lockdown came into effect), there was still the option of having face-to-face discussions in the villages, but Sunnica chose the webinars as their preferred way to consult.
- 3.5.9. Residents expected that the webinars would enable a two-way dialogue between Sunnica and the attendees. It was accepted that during such unprecedented circumstances, Zoom meetings and other video conferences provided a means of having a discussion. Unfortunately, Sunnica did not hold the webinars as a video conference. The format was complicated, comprising a presentation, followed by a Q&A session which was not 'live' in the sense that questions could not be asked directly to the presenters and receive a direct answer. Instead, questions had to be submitted in advance of the webinars or submitted via the 'chat' function during the webinar. A mediator collated the questions, in some cases grouping them together or paraphrasing incorrectly, so residents were unable to ask their questions directly. This prevented any dialogue or correction where the question was misunderstood or misrepresented.
- 3.5.10. Often, attendees waited to the end of the webinar (sometimes over 2 hours) to hear their question being addressed, only to find that their query was misinterpreted or insufficiently answered, but there was no opportunity to seek further clarification. Residents left the webinars feeling frustrated, and with far more questions than answers. They were ineffective.
- 3.5.11. Analysis of the three Q&A webinars showed that only 55% of the questions received a direct answer (Appendix 3). And of those questions that were answered, a large proportion of the response were inadequate or irrelevant.
- 3.5.12. Because there was no opportunity to engage in 'virtual conversation' with this complicated format, some attendees asked Sunnica if they could change the format to operate webinars as a two-way live video conference to improve the level of communication. This was important, as often one person's question can trigger other questions from other attendees and there is a better flow of information and engagement, leading to more comprehensive answers being obtained.

- 3.5.13. Sunnica declined this, saying that a more ‘open’ format of virtual meeting was not possible due to GDPR and persevered with their frustrating and flawed format. They seemed to be deliberately trying to disengage residents, and some that attended one webinar felt so frustrated that they didn’t attend others.
- 3.5.14. This GDPR statement is not true – two webinars were held locally in November 2020 for a local major transport scheme public consultation where participants could ask questions verbally and there was a two-way dialogue. Data protection requirements were upheld using this format.
- 3.5.15. In addition, many of the councils, local MPs, etc held meetings during the Sunnica consultation period using Zoom or other video conferencing software, and there was never any issue with GDPR since it is easy for people to log in anonymously should they prefer to do so. These were also well attended (over 100 people), compared to the poor attendance of the Sunnica webinars.
- 3.5.16. It could be expected during a consultation period that the number of webinar participants would increase as more residents became aware of the consultation. This was not the case with the Sunnica Statutory Consultation, in part due to the flawed format that Sunnica chose to pursue.
- 3.5.17. Attendance at the webinars as observed by the CAG is shown in the table below (note that many attendees were CAG members. The numbers include repeat attendees):

Time	Date	Topic	Attendees
18:00	01/10/2020	Introduction	12
14:00	03/10/2020	Sunnica East	21
18:00	08/10/2020	Sunnica West	14
14:00	10/10/2020	Grid Connection	13
18:00	15/10/2020	Environmental	18
14:00	17/10/2020	Construction	12
14:00	24/10/2020	Introduction	2
18:00	29/10/2020	Sunnica East	6
14:00	21/10/2020	Sunnica West	No Data
18:00	05/11/2020	Grid Connection	No Data
14:00	07/11/2020	Environmental	3
18:00	12/11/2020	Construction	No Data
19:00 - 20:00	18/11/2020	Q&A 1	26
19:00 - 20:00	25/11/2020	Q&A 2	44 (Peak)
19:00 - 20:00	02/12/2020	Q&A 3	No Data

- 3.5.18. The sequence of webinars was repeated but without changing the time, such that the 18:00 webinar on 08/10/2020 on Sunnica East would, for example, run at 14:00 (instead of 18:00) on 29/10/2020 to catch people who might not have been able to see it the first time.
- 3.5.19. Residents' time was wasted during the webinars, which were categorised into different topics. The first introductory portion (approx. 20 mins) of each webinar was repeated on each session, so attendees had to sit through the same presentation multiple times before getting to the part they were interested in. This led to frustration at not being able to get to the information they wanted to assess the impact. This 'standard introduction' could have simply been pre-recorded and made available, allowing more time for the specific topic matter to be discussed and, importantly, the Q&A.
- 3.5.20. Splitting the webinars into subjects resulted in reduced consultation time. Those wishing to hear more on a given topic had to wait until the necessary presentation before they could obtain further information about this. And if they weren't available to attend the webinar on the date on which their topic of interest had been scheduled, they had to wait for the recording to be uploaded before they could listen. But this meant that they were unable to ask questions as it was no longer live.
- 3.5.21. Additionally, the webinar recordings took an unnecessarily long time (sometimes over 2 weeks) to upload to the Sunnica website. The sound quality was also poor in some cases. One of the webinars had a technical fault, so only a partial recording was available.
- 3.5.22. The presentations on the various topics could have been pre-recorded and made available from the outset of the consultation period. The format chosen by Sunnica did not allow maximum time for residents to engage with the consultation, nor to listen to the topics at their convenience and formulate questions, which Sunnica could then have responded to in a simple two-way Q&A video conference.
- 3.5.23. The whole webinar process maximised frustration, restricted access to subject matter, and provided confusing and contradictory information to that presented in the written materials.
- 3.5.24. Attendees asked questions that were pertinent to the proposals. These were about sourcing of the PV panels and raw materials, and about use of local labour in construction. These questions were not answered as Sunnica deemed them to be the responsibility of

an un-named funder. But Sunnica Ltd are the developer, they are the applicant for the DCO, and upon whom obligations in the DCO are binding. Webinar attendees concluded that Sunnica were not interested in obligations and were simply fronting an unknown third party who was the actual decision maker.

3.6. Missing, Misleading and Conflicting Information

3.6.1. The online consultation material was confusing and lacking in detail in areas. 41% of residents who responded to a CAG survey found it difficult to navigate. Comments about the virtual information included:

- insufficient detail provided about the scheme
- difficulty trying to toggle between webpages to pull information together
- insufficient details on maps etc to assess the exact locations, no markings or reference points on some of the maps, so it was difficult to see where the locations were meant to be
- no search function meaning that the viewer had to know what they were looking for to find it.
- no overall summary or FAQ style area directing residents to the areas of the website that might help them navigate better, no cross referencing to help users make connections between maps on different pages etc

3.6.2. The online format was not readily accessible to less confident computer users and, as such, was excluded a large portion of the local communities.

3.6.3. Visualisations of the scheme were not available in the consultation booklet or online at the outset.

3.6.4. Sunnica were asked by residents several times about providing visualisations. They were reluctant to provide these at intervals other than after 1 and after 15 years. Residents felt that more were necessary to enable them to visualise the impact of the scheme over the course of the first 15 years. Sunnica stated that they were just conforming to industry practice, so they only had to provide the minimum required.

- 3.6.5. After further requests for visualisations from webinar attendees, Sunnica eventually placed visualisations of the scheme on the website only. No additional examples were provided using other formats to accommodate those without access to the website.
- 3.6.6. Those that were eventually provided were very difficult to interpret. Figure 14 shows a “View west from PRoW (footpath) W-257/002/X – Type 4 visualtion Year 15”.
- 3.6.7. To establish where this is, the user needs to try to find another map somewhere on the website (no cross referencing was provided), and then try to find PRoW number W-257/002/X and then toggle back to this photo to try and see where it is and what it might look like in 15 years’ time. This is not presented in a non-technical format.
- 3.6.8. This is incredibly confusing and time consuming and does not readily allow people to visualise how the scheme might appear. This is a key part of being able to assess the impact on them.



FIGURE 14 - EXAMPLE OF CONFUSING PHOTOMONTAGE

- 3.6.9. The visual impact map on pg. 24 of the consultation booklet is “modelled on substation heights of max 8.5 m.” But it is not clear which substations these are. It is not clear if this refers to the BESS units (which on pg. 14 are said to be 6m high), or the Burwell substation expansion or the solar stations – but in the PEIR this height is given as 12m.
- 3.6.10. There is also reference to 10m high “electrical compounds” (Figure 15) but again it is not clear what these are.

3.6.11. This confusing information prevents a true assessment of the visual impact of the scheme during construction/operation. These are significant structures, so warrant careful explanation of what they are, where they will be and how they will most likely look.

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- The solar arrays would be set within an aluminium frame and mounted on a steel rack. The panels would be angled with their highest edge 2.5m above ground level and all panels would be fixed in a south facing orientation and would not rotate to follow the sun;
- The invertors, switchgear and transformers would also be 3m in height and the solar stations would be 3.5m in height;
- The battery energy storage system ('BESS') would be 6m in height;
- The electrical compound would include substations which are 10m in height (with Burwell Sub-station extension at 12m) and control buildings which are 6m in height;
- The proposed landscape design would consist of a native grassland beneath the panels and in areas of ecological enhancement or archaeological mitigation. This grassland would not have fully established at year 1.
- Proposed new native hedgerows would be between 0.6m and 0.8m in height with tree planting between 1m and 3.5m in height dependant on available plants and natural variation in heights;
- All new planting (the 'Green Infrastructure') as per the preliminary the Parameter Plans would be implemented and managed in accordance with the Outline Landscape Ecology Management Plan ('OLEMP'), a draft version of which is included within **PEI Report Volume 2: Appendix 40**.

FIGURE 15 - EXTRACT FROM CHAPTER 10 OF PEIR

3.6.12. A considerable amount of information was either not provided, or left unanswered, during and after the Sunnica consultation. Many of these points were outlined in the joint response by the 4 local authorities affected by the scheme – a 79 page document detailing well over 500 items of missing details (see link to the full report under Section 4, 'References'). This includes fundamental information that allows residents to assess the impact of the scheme on them during construction and operation e.g.:

- Not marking existing solar farms on the consultation maps, making 'cumulative impact' impossible to assess.
- Not declaring the approximate number of solar panels until pressed to do so by multiple residents' questions during the consultation, and then only indicating that there could be around 1.1 million solar panels to the 14 residents who listened to the webinar in which this was discussed (3rd Webinar 8/10/2020). This is a vast number of solar panels. These kinds of estimates must be made available to all consultation participants to allow them to appreciate the scale of this scheme. The panels arguably have the broadest impact and cannot be excluded from the consultation.

- Not providing any indication about the impact of the loss of ca. 2500 acres of highly productive vegetable growing land for at least 40 years, and how this shortfall in local food production could be made up. Nor did Sunnica provide adequate information about how this will affect the local agriculture-related economy; which is key to this area. When questioned about this during webinars, Sunnica simply replied by saying, *“We will need to find other land to farm.”* This is not an adequate answer to loss of such a large amount of highly productive farmland. This lack of information does not allow the residents here to assess the impact of the scheme during operation and how losses will be compensated.
- Sunnica also incorrectly stated in the PEIR that the land in this area is predominantly grade 3b and 4, which residents (many of whom have worked in agriculture in this area for years) know not to be true (see Appendix 2 – Sunnica site with ALC grading). There are large areas of grade 2 land, which are not mentioned by Sunnica.
- Sunnica did not explain how or why they have ‘downgraded’ the land. They also omitted to inform residents that the land is irrigated and capable of growing a wide range of vegetable crops (which would not be consistent with grade 3b and 4 land). Consultees reading this were misled about the quality of the soil, and their opinions and expectations of the agricultural potential of the land would have been incorrect.
- When asked by residents and local authority planning officers to provide evidence of their soil classification, Sunnica declined. Sunnica eventually disclosed the data on their agricultural assessments to local authorities in August 2021 after repeated requests, but not to local residents. This is not the spirit of consultation– not with local residents nor with local authorities.
- Not declaring information about disruption/ damage to roads/ footpaths/ bridle ways or construction noise/ pollution. Residents of Burwell who live near a newly constructed solar farm on Factory Road described the construction noise from continual piling and drilling as unbearable, and that it had prevented them from being able to be outdoors for several months. According to Sunnica’s booklet, they do not anticipate *“any significant noise effects from construction,*

operation or decommissioning.” This is highly unlikely and contradictory to local experience, and warrants further engagement to clarify.

- No details at all regarding other sites that were considered for the scheme and why the proposed area was chosen to be more suitable above these. This would have enabled a better understanding of why the scheme needs to be designed as it is, and in the area it is. MPs also wrote to request more information about alternative sites, but Sunnica chose not to divulge this, simply providing an overview of the process they had followed but not specifying alternative sites that were considered as part of this process.
- No details about how the anticipated output/ efficiency of the proposed scheme compares with other technologies so that people could establish the value of the Sunnica proposal to compare with the impact it will have on them.

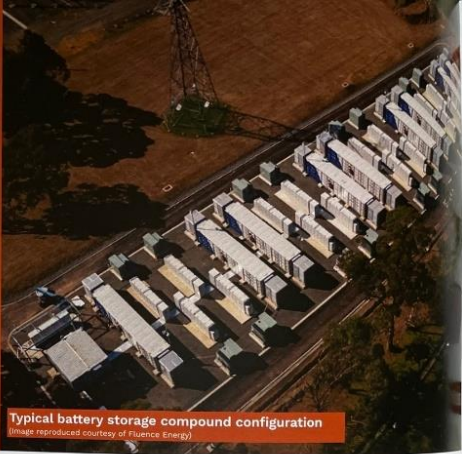
3.6.13. Sunnica did not willingly cooperate during the consultation or put themselves in a more favourable light with residents/councillors/MPs/planning departments etc during this process.

3.6.14. Details regarding BESS were particularly scant, which did not allow residents to understand the implications that the BESS storage compounds would have on them.

- Sunnica did not declare the likely battery technology, so did not allow residents to gauge battery safety, a crucial part of the impact during construction and operation given the known fire hazards of commonly used BESS technology (e.g. Li-ion). They did not declare the expected electrical capacity of the BESS to permit a rough idea of the scale of the operation.
- Not declaring the approximate number of battery energy storage containers and the approximate dimensions of these. Misleading images were depicted in the brochure of battery sites showing just 9 containers (Figure 16). However, the CAG estimates that there will be around 100 containers of batteries on *each* of the potential 3 sites. An image showing a battery compound with 10x more containers than the chosen image would have been more realistic. No visualisations of the BESS sites or substation expansion were provided. In addition, the aerial view of a the smaller facility in Figure 16 does not help the reader to assess the impact from ground level. These are some of the largest and tallest structures in the scheme and will have the most widespread visual impact. Residents did not feel consulted on the BESS aspect of the proposal at all.

Battery storage

During the non-statutory consultation, we asked for views on whether the Battery Energy Storage Systems (BESS) should be concentrated in specific locations or spread across different locations across all the sites.



Typical battery storage compound configuration
(Image reproduced courtesy of Fluence Energy)

A majority of people who responded to the consultation said that the BESS should be concentrated. A number of responses also emphasised that the BESS should be located away from homes and well screened.

We are now proposing that the BESS is concentrated at three locations marked on the plans on pages 9, 11 and 15. These are:

- Sunnica East Site A – within the area marked **E33**
- Sunnica East Site B – within the area marked **E18**
- Sunnica West Site A – within the area marked **W17**

Each will consist of containers that will house the batteries. The containers will be a maximum of 6m in height. Images with the indicative appearance of these containers are shown here.

Locating the BESS together means we are better able to screen them from the outside. We have looked to locate the BESS away from homes, select appropriate colours, and screen them with planting.

We were asked at our public exhibitions last year about how safe the BESS would be particularly with regards to fire risk. We take the risk of a potential fire very seriously. Each container would be isolated and would contain an automatic fire control system. If approved, the Scheme would be subject to a Battery Fire Safety Plan.

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FIGURE 16 - IMAGE OF 'TYPICAL' BATTERY COMPOUND

3.6.15. Misleading and conflicting information about the purpose of the BESS. They were portrayed in the non-statutory consultation materials as being for the storage of the energy derived from the Sunnica solar panels (Figure 17).

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



The diagram illustrates two configurations for a battery energy storage system:

- Distributed battery energy storage system:** Shows a PV plant connected to a solar inverter (PCS). The output goes to a power plant controller (PPC) which is connected to a battery inverter PCS. The battery inverter PCS is connected to a DC/DC controller, which is then connected to an HV solution transformer and switchgear, and finally to an HV substation.
- Centrally located battery energy storage system:** Shows a PV plant connected to a solar inverter (PCS). The output goes to a DC/DC controller, which is connected to a power plant controller (PPC). The PPC is connected to a battery inverter PCS, which is then connected to an HV solution transformer and switchgear, and finally to an HV substation.

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FIGURE 17 - BESS INFORMATION IN NON-STATUTORY CONSULTATION BROCHURE

- 3.6.16. However, a different use of the BESS was described by Sunnica during one of the late statutory consultation webinar Q&A sessions (18th Nov 2020, attended by 26 people). In this webinar they described how the BESS were to be used for energy trading and explained that this entailed drawing energy from the Grid (energy from all fuel types – solar, wind, and even fossil fuels, etc.) when there is a surplus and then selling it back to the Grid at a higher price when demand is higher.
- 3.6.17. This was not clear in the public consultation booklet or website; indeed, it was not stated exactly what the BESS were for (Figure 18). The way the information was presented in the booklet, adjacent to a section on PV technology, meant that any reader might reasonably conclude that they were simply part of a solar generation facility. But it seems this may not be the case. This is a significant omission. It changes the nature of the entire scheme and requires full consultation so that all residents are aware of this potential additional use of the BESS (not just the 26 people who attended the webinar).



FIGURE 18 - BESS IN STATUTORY CONSULTATION BOOKLET

- 3.6.18. This prejudices those who would only consent to the BESS for the purpose of storing the Sunnica solar energy to smooth out demand/supply but would not accept BESS as part of a fossil and other energy trading scheme. It implies that the BESS is an integral and necessary component of solar energy generation, when in fact it is not. Given knowledge of the size of the BESS compounds, their imposing size, and that they are to some extent a separate scheme, the response to consultation may have been different.

- 3.6.19. An energy trading operation is a separate enterprise and should be indicated as such. It is very different to the 'usual' solar farms that operate in this area (which do not have large scale BESS).
- 3.6.20. If the Sunnica proposal is truly intended as an energy trading facility, residents have been denied consultation on this significant additional aspect of the scheme and this needs to be corrected.
- 3.6.21. Sunnica also implied that they had acted on views from the non-statutory consultation regarding the BESS – that they were concentrated and sited away from peoples' homes (Figure 19). This has not happened. The proposed BESS locations described in the Statutory Consultation material are very close to peoples' homes. This is misleading.

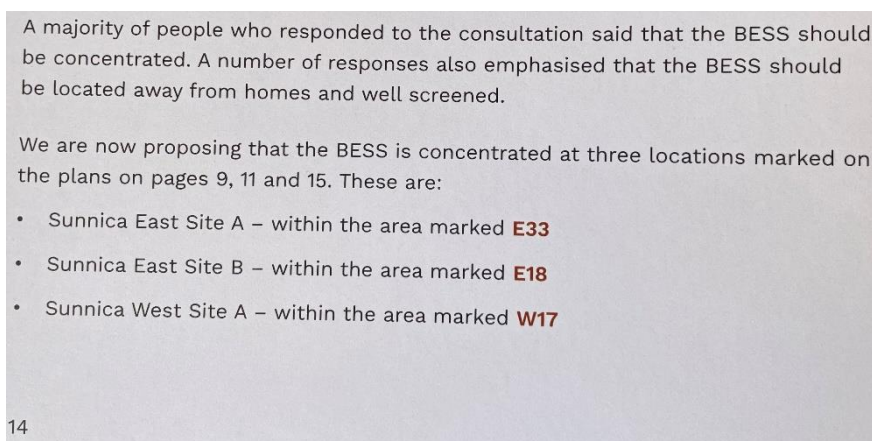


FIGURE 19 - DESCRIPTION OF BESS LOCATION IN BROCHURE

- 3.6.22. Local authorities were provided with a scheme description of a solar farm with *potential* BESS storage. But the Sunnica consultation booklet and website made no mention of these being an 'option', but rather a given. This has caused more confusion, as no plans have been issued to indicate what the scheme would entail if BESS were not included.
- 3.6.23. During the non-statutory consultation and in the webinars Sunnica maintained a position that the agricultural land in the area was poor, and non-productive. This conflicts with the experience of many local people that the land is productive farmland. It also conflicts with available information that much of the scheme is on land with a significant likelihood of being Best and Most Versatile land. Requests to carry out a soil survey to establish an independent assessment of land classification were refused and access to land was prevented.

- 3.6.24. A plan of the area is provided in Appendix 2. This shows the boundary of the Sunnica scheme overlaid on a plan showing the classification of land. It can be seen that the majority of the proposed scheme lies in areas of Grade 2 and Grade 3 land (Best and Most Versatile land). Readers of the consultation materials have likely been misled about the quality of the land, and thus may not have truly assessed the impact of the scheme during construction/ operation.
- 3.6.25. There are many, many more examples of the missing and conflicting information that are considered important in assessing the impact of the scheme. Ranging from an absence of highways details (how the scheme sites would be accessed for construction and impacts on roads, footpaths, bridle ways etc during/ after construction) to likely compulsory purchase/ access and archaeological/ heritage impacts to a lack of detail about adverse impact on wildlife.
- 3.6.26. Indeed, on pg. 19 of the consultation booklet, Sunnica only comments about habitat loss as being the main impact on wildlife. They then move on to comments about creating new habitats, but do not mention that these will predominantly be created *after* the scheme has been constructed. This does not allow the reader to truly assess the impact, as they would not necessarily appreciate that there is a gap in available wildlife habitats during the construction period, and until the newly created habitats may be established.
- 3.6.27. In the webinar dated 15th October 2020 Sunnica admitted that there would be “loss of species”. This was not indicated in any written consultation materials. In a rural area, rich in wildlife, and with many local nature-lovers and wildlife experts and enthusiasts, loss of species as a result of the scheme is a significant impact. These residents were misled by the written materials and not allowed to assess the true impact during construction/ operation/ decommissioning.
- 3.6.28. Decommissioning is another key area that Sunnica specifically said they would consult residents about, and it was included in their SoCC (Figure 20). Almost no details were provided on decommissioning, as indicated by the brochure extract in Figure 20. When asked about decommissioning in the webinars, Sunnica deflected and said that details would be in the Decommissioning Environmental Management Plan. When asked to see a draft Sunnica said this would not be put together until 6-12 months before decommissioning takes place.

Decommissioning

The Scheme would be designed for an **operating life of at least 40 years**. Once the Scheme reaches the end of its operating life, it would be decommissioned in accordance with a decommissioning plan that will need to be approved as part of the DCO. This would involve, for example, removing the solar panels and BESS and **restoring the land to its previous condition**. This means farmland will not be permanently lost as a result of our proposals. The solar panels and batteries would be recycled at this stage.

Decommissioning is expected to take between **12 and 24 months to complete**.

Sunnica Limited would have a **legal responsibility** throughout the operational life of the Sunnica Energy Farm to ensure that it complies with the DCO and all other relevant legislation and regulations.

FIGURE 20 - BROCHURE SECTION ON DECOMMISSIONING

- 3.6.29. Sunnica stated in their Statement of Community Consultation that they would consult on “Impacts from Decommissioning” (Figure 12). However, as no details were provided on decommissioning apart from a very brief statement, devoid of impacts, consultation on this subject has not been achieved.
- 3.6.30. Unhappy with the level of information provided by Sunnica, residents wrote to local MPs asking them to seek clarification from Sunnica on decommissioning (and other matters), but they also received a similar response (Figure 21). There is no detail – not even in draft form - of how decommissioning will be undertaken, who will be responsible, etc. No guarantee that all materials will be recycled, no guarantee that components would not go into landfill (and create another environmental hazard). No indication of likely cost, etc. Residents have therefore not been consulted on decommissioning and have not been able to assess the potential legacy that will be left behind once the scheme comes to an end.
- 3.6.31. The consequence is that there has not been effective consultation on decommissioning. The Planning Inspectorate is being asked to examine a scheme that will be in place for over a generation, with details of its decommissioning to be worked out after it has been consented.

A Decommissioning Environmental Management Plan (DEMP) and a Decommissioning Resource Management Plan (DRMP) will be prepared and implemented to manage the decommissioning of the Scheme. These will be produced at least six months prior to decommissioning and will be secured by the DCO ensuring that Sunnica delivers on the commitments it makes in respect of decommissioning.

The DRMP will detail the management of resources during decommissioning, including the planned destinations for reuse, recycling or landfill of materials at the time of this occurring. During all phases of the Scheme, the Waste Hierarchy will be adopted to ensure that reuse and recycling of all materials is prioritised. Section 16.7 of Chapter 16 Other Environmental Topics in the PEI Report provides further details.

The Decommissioning Environmental Management Plan will detail the mitigation measures to be adopted by the contractor during decommissioning so as to prevent and / or minimise effects on a

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range of environmental parameters during decommissioning. It will be similar in format and function as the CEMP, which will be followed by the contractor during construction. An Outline CEMP has been produced and is provided in Appendix 16C of the PEI Report, which is an example of the type of document that will be produced.

FIGURE 21 - EXTRACT FROM LETTER TO LUCY FRAZER MP

- 3.6.32. Misleading and confusing statements about Sunnica having a legal responsibility throughout the operational life of their Energy Farm, which contradicts their comments in later webinars (e.g. Q&A webinar dated 18/11/2020) that they may sell on the DCO if it was granted and that ownership would not be the same throughout the operational life of the scheme.
- 3.6.33. Sunnica's likely intention to obtain the DCO and sell it on as a speculative opportunity should have been highlighted in the consultation material. Some people may have been reassured by statements in the material from the organisation that they believed would also operate the scheme for the 40 year duration. They may view the impact of the scheme differently if they thought it might change hands several times in its' lifetime, and therefore provide uncertainty in relation to who is responsible for the scheme during construction, operation, and decommissioning.

- 3.6.34. Excessive use of ‘The Rochdale Envelope’ throughout the consultation process. Sunnica used this concept in order to provide insufficient details on which residents could be consulted. The Rochdale Envelope principle expects applicants to state the ‘worst-case scenario’ of many relevant factors for public consideration i.e. environmental impact, safety, etc.
- 3.6.35. Worst-case scenarios were *not* provided by Sunnica – just an omission of any detail. Consultees need further consultation so that these details, or ‘worst-case scenarios’ may be considered.
- 3.6.36. As stated in the Planning Inspectorate’s guide to using the Rochdale envelope ([Advice-note-9.-Rochdale-envelope-web.pdf \(planninginspectorate.gov.uk\)](https://www.planninginspectorate.gov.uk/advice-note-9-rochdale-envelope-web.pdf)),
- “the assessments should be based on a cautious ‘worst case’ approach”
and the level of information required should be:
 - “sufficient information to enable ‘the main,’ or the ‘likely significant’ effects on the environment to be assessed.”
- 3.6.37. This has not been adhered to during the Sunnica Statutory Consultation. Only an absence of any detail about batteries, alternative sites, decommissioning, and more.
- 3.6.38. The Rochdale envelope guide also states that:
- “The need for ‘flexibility’ should not be abused - this does not give developers an excuse to provide inadequate descriptions of their projects.”
- 3.6.39. Residents, councillors, and MPs alike consider Sunnica’s descriptions to be inadequate.
- 3.6.40. An example of the uncertainty in Sunnica’s plans can be heard during their webinars . This clip includes multiple references to the PEIR, which was not accessible to all.
- 3.6.41. Misleading and inaccurate statements in the Statutory Consultation booklet that the scheme had been made ‘smaller’ by Sunnica following feedback from the non-statutory consultation. The scheme boundary changes were due to a landowner in Freckenham withdrawing his land from the scheme, and Sunnica seeking alternative sites. The gap was filled by a landowner from West Row, who offered an area of land around Isleham. This culminated in the previous single site near Freckenham being replaced by two ‘smaller’ sites. But this addition made the impact even greater, as it required an additional cabling

route to connect the patchwork of solar sites together and surrounded even more villages. These areas, being added so late to the scheme, were disadvantaged from the outset from being effectively consulted, as previously outlined in this report.

- 3.6.42. Other 'reductions' and 'amendments' that Sunnica implied as being made following community feedback were also not entirely truthful. Some of the changes in land use within the scheme boundary that were outlined in the late August 2021 update leaflet had to be made because of archaeological/ wildlife findings from their surveys. Not necessarily as a result of listening to community feedback.
- 3.6.43. Misleading images throughout the consultation booklet, showing panels of around 1.5m high (e.g. Figure 2). Lack of transparency regarding the scale of the scheme in acres/hectares (around 2500 acres), so residents were unable to assess how it compares to the solar farms in this area, which typically range in size from 25-200 acres. This needed to be highlighted by Sunnica as many residents had no concept of this from their first impressions of the brochure. If approved, this would be the largest solar plant in Europe at the present time. But this is not mentioned anywhere in the brochure, website or in the SoCC.
- 3.6.44. In the SoCC Sunnica merely stated that the scheme is a NSIP that exceeds 50 MW (Figure 22). But it doesn't state by how much. 500 MW is a significant leap from 50 MW, and is much greater from what local understanding of a 'typical' solar farm output is (operational solar farms in this area are between 5 and 38 MW). The purpose of a public consultation is to draw attention to the public to what the scheme involved but this was not clear.

The planning process

We are developing the proposed Sunnica Energy Farm under the Planning Act 2008. This is because its proposed generating capacity exceeds 50 megawatts (MW), which means that under the Planning Act 2008 the Sunnica Energy Farm constitutes an NSIP requiring a DCO.

Unlike planning applications, which are considered by local authorities, DCO applications are made to the Planning Inspectorate (PINS). This independent body administers the application process on behalf of the relevant Secretary of State. In this case, the appropriate government department is the Department for Business, Energy & Industrial Strategy (BEIS). Further information on the DCO application process can be obtained from PINS Advice Note 8: Overview of the nationally significant infrastructure planning process for members of the public and others. A link to the document is here: <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2013/04/Advice-note-8.0.pdf>

FIGURE 22 - EXTRACT FROM SOCC

3.7. Inadequate Advertising, Insufficient Time for Review, Lack of Responses

- 3.7.1. The Statutory Consultation started during an escalating Covid-19 pandemic and included a 4-week period of national lockdown, followed by a period of restricted movement. Sunnica only extended the consultation period by 16 days, which could not compensate for the lengthy time that people had to limit their movements and access to information. The overall consultation time was insufficient given that it was held during a pandemic.
- 3.7.2. In addition, during this time, many consultees, or organisations that residents contacted to ask for advice/ additional detail to assess the impact of the scheme were either closed or running on limited staff. This resulted in lengthy time delays getting responses. Residents consequently ran out of time to add these points into their consultation response and to their assessment of the impact.
- 3.7.3. Lack of response by Sunnica to questions submitted by residents and Parish Councils alike – either written questions from letters and emails or those submitted during webinars (as previously outlined in this report). As an example, Freckenham Parish Council is still awaiting a response to their non-statutory consultation comments, as well as written questions submitted by email to Sunnica on 15th July 2020 and 21st September 2020, prior to the Statutory Consultation. Residents also submitted questions via email, which also went unanswered.
- 3.7.4. Sunnica were also slow to reply to written questions during the Statutory Consultation. Telephone calls were left with the promise of a call back, which never came. For example, the CAG called to ask about alternative options for providing access to the PEIR in the villages. The Sunnica representative said they would discuss and call back, but they never did. It was all very unsatisfactory and prevented residents from being able to understand and assess the impact of the proposal within the allocated time.
- 3.7.5. Instructions on how to book an individual appointment to speak to a member of the Sunnica staff was located on the back of the consultation booklet, in small print. The use of small font sizes was raised by a Parish Council, as this discriminates against those with visual impairment. A statement at the front of the booklet in larger font, or in other advertising, would have been more effective in ensuring appointments were accessible to those who needed them.

- 3.7.6. Councils also informed the CAG that they had been given insufficient time to consider the Statement of Community Consultation (from 3rd Aug-1st Sept 2020) during the pandemic. Not only was this released during the summer holidays, but effective consideration by Officers was difficult to achieve with staff illnesses, remote working, etc.
- 3.7.7. Consultation notifications in local newspapers were inadequate. These were written in the small print at the back of newspapers that were not so widely read (e.g. Figure 23). No advertisements were placed in local village publications (which are hand delivered to every household), or the town/village community Facebook groups. These would have been far more effective. We have made the point previously that, in the modern age, local newspapers are in decline and although notice publication in local papers is a legal requirement, it is not effective.
- 3.7.8. Sunnica stated during one of their webinars that they ran a paid Facebook campaign resulting in 'several thousand' page impressions – but the village community Facebook groups did not see any posts, so it is unclear if these 'impressions' were seen by the intended recipients.
- 3.7.9. The nature of the advertisements that Sunnica ran in local newspapers was ineffective (Figure 13). Very small white text on a dark background, making them difficult to read. In addition, the same inadequate description for the scheme was used in these (Burwell in Cambridgeshire) as discussed previously, meaning that many residents (especially in Suffolk) would not have paid much regard to these.

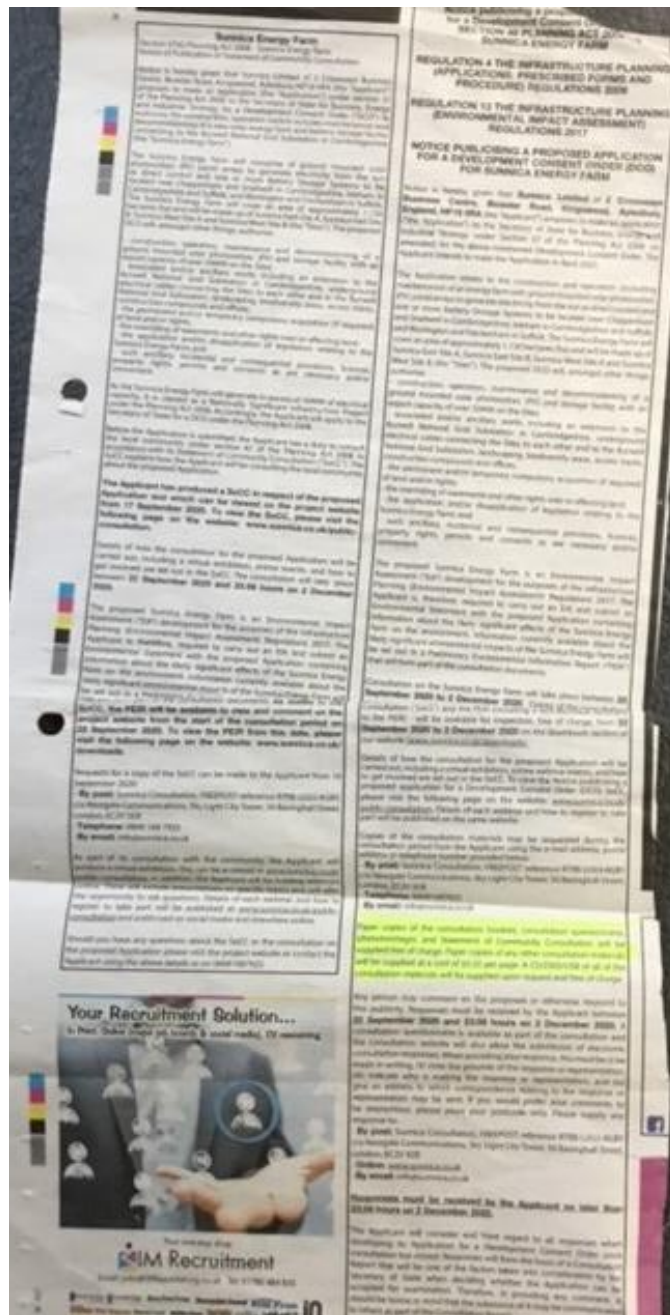


FIGURE 23 - NOTICE IN NEWMARKET JOURNAL

3.7.10. Initially, there was no physical advertising in the form of posters/ banners in the villages. Banners are required by West Suffolk Council’s Statement of Community Involvement as “Line of sight publicity.” Adoption of local authorities Statements of Community Involvement is recommended by Advice Note 2 from the Planning Inspectorate, Section 5.3:

“A local authority’s adopted Statement of Community Involvement (or Community Involvement Scheme in Wales) is likely to have a bearing on its response to the developer’s SoCC Consultation.”

- 3.7.11. Freckenham Parish Council requested a banner for each village in Consultation Zone 1 as a written question to the Parish Councils Alliance briefing by Sunnica on 21st September 2020 (the evening before the Statutory Consultation started).
- 3.7.12. One single banner was eventually sent to each Parish Council in late October/early November – mid way through the consultation. An example is shown in Figure 24.
- 3.7.13. More banners/ posters were needed to advertise the consultation, and these should have been in place in the lead up to the consultation starting, not part-way through.
- 3.7.14. By the time the banners finally arrived and were put in place there was a second national lockdown, meaning that residents were not moving around the villages, which significantly reduced their effectiveness.



FIGURE 24 - BANNER PROVIDED BY SUNNICA

- 3.7.15. The consultation dates changed from 22 Sep-2nd Dec 2020 to 22 Sep-18th Dec 2020, but the banners were not updated. This led to confusion as many people were unaware that they had an additional 16 days to respond to the consultation period. They thought they had missed the deadline to respond when in fact this had changed.
- 3.7.16. The lack of effective advertising limited the awareness of the consultation, which was reflected in the lack of engagement in online activities such as the webinars, as outlined in section 2.5.

3.8. Consultation Response Receipt/Tracking

- 3.8.1. Consultation responses that were submitted via Sunnica's paper questionnaire were not traceable. The questionnaires were not numbered or coded, so there was no way of gauging gaps in responses or issuing receipts to confirm they had arrived at the Sunnica address. There was no way of obtaining any statistics on the number of responses compared to the numbers of questionnaires distributed.
- 3.8.2. For example, Kennett and Snailwell were highlighted in the SoCC as villages that had not previously been engaged consultation. But there was no way of assessing how many paper responses were returned from Kennett or Snailwell unless the responder divulged their location details (which was optional).
- 3.8.3. Consultation responses submitted via the online questionnaire also had no confirmation of submission or acknowledgement of receipt. The sender had no indication that their consultation responses had been sent and did not receive a copy of the online responses they had submitted, which would have been helpful for future reference.
- 3.8.4. Responders complained that they were unable to check that their responses to all sections of the questionnaire had been received.

4. Conclusion

- 4.1.1. Sunnica has not complied fully with their Statement of Community Consultation.
- 4.1.2. Local people were not given access to information to enable them to consider the proposals fully. Information that was provided was in some cases incorrect and biased in favour of Sunnica (agricultural land classification). Pertinent questions in the webinars were deflected and alleged to be the responsibility of an un-named third party, the funder. People who thought they were talking to the future holder of obligations, found they were not.
- 4.1.3. The nature of the BESS was concealed. It was not clear that this could also be an energy trading scheme, and that the BESS were for storing energy (from renewable and non-renewable sources) from the grid, not just smoothing PV generation.
- 4.1.4. There was excessive reliance on postal address information, excluding anyone who did not have a postal address, or may have had the misfortune to live in a newly built property. Some properties that were occupied were deemed unoccupied. There was a lack of due diligence on the part of Sunnica.
- 4.1.5. Even where Sunnica had contact details they posted a letter by nailing it to a gate. And then, when asked for further information, did not provide details.
- 4.1.6. Many people who were not directly impacted during the statutory consultation found that they were at a later stage impacted by changes to access routes and road/junction widening. They were sent small-scale plans showing just a red line boundary, but no details of what their land was required for, or if this was permanent or temporary.
- 4.1.7. People found at a late stage that they were at risk of compulsory purchase for improvements for access routes. They were not properly consulted, only sent a small-scale plan showing the red line boundary with no information on the works proposed.
- 4.1.8. There was no consultation on decommissioning as set out in the Statement of Community Consultation. No details were provided of how this would be achieved or secured.
- 4.1.9. When asked in our survey 93% of respondents did not feel they had been consulted properly. Some 44% had heard about the scheme by word of mouth, and only 60% had received a consultation booklet. These were people living in Zone 1 who were all supposed to have received a direct mailing.

- 4.1.10. Only 35% of respondents were aware of more information being available on the Sunnica website. Of those that did access the website only 7% found it easy to find information they were looking for.
- 4.1.11. Some 67% of people found it difficult to visualise the proposals from the information provided. 58% of people said they could not understand the scheme properly, 49% were unable to ask questions to help them understand it, and 50% were unaware of the impact upon them.
- 4.1.12. The consultation cannot be considered adequate and consequently we ask the Planning Inspectorate to reject the application at this stage.

5. References/Media articles

- Joint Response to Statutory Consultation by 4 host authorities:
[REDACTED]
[REDACTED]
- East Cambridgeshire District Council planning meeting 2nd Sept 2020. Sunnica proposal discussed at 2 hours. [East Cambridgeshire District Council, Planning Committee 2nd September 2020 - YouTube](#)
- West Suffolk Councillor comments about the consultation being 'farcical' (3.01 minutes) 7th Dec 2020. [Say No To Sunnica - YouTube](#)
- Ely Standard Newspaper article 21st Sept 2020: ['Man up' and start talking energy firm told](#)).
- East Anglia Daily Times article 11th Nov 2020 with comments from several Suffolk County Councillors regarding inadequate consultation
[REDACTED]
[REDACTED]
- Freckenham Parish Council complaint letter to Sunnica on 9th Oct outlining concerns about the consultation. Sunnica declined to offer additional support for most of the concerns raised ([9.10.20-Sunnica-stat-consultation-complaint.docx.pdf \(suffolk.cloud\)](#))
- Consultation not good enough. Report in Newmarket Journal 29th Nov 2020
[REDACTED]
[REDACTED]

Appendix 1 – Summary of CAG Survey Results

We undertook a survey of local residents to capture their views on the adequacy of the Sunnica consultation.

Method

Paper copies of the survey were distributed in villages located within Sunnica's 'Consultation Zone 1' (taken from the SoCC)

The survey was also made available online using Survey Monkey.

The link to the online version was distributed within Consultation Zone 1 via village Facebook groups, as well as

Parish Council Facebook pages and through leaflets and village newsletters that were in circulation at that time.

Responses

Overall, there were 600 responses. This comprised 112 from the paper survey and 488 from the online survey. The responses are summarised in Table 1

TABLE 1 CAG SURVEY RESPONSES

Q1 Are you aware of the Sunnica solar and battery proposal?

<u>Response</u>	<u>Online</u>	<u>Burwell paper</u>	<u>Non-Burwell paper</u>	<u>Total</u>	<u>Percentage</u>
Yes	485	76	23	584	97%
No	3	13	0	16	3%
Total	488	89	23	600	

Q2 How did you first find out about the Sunnica scheme?

<u>Response</u>	<u>Online</u>	<u>Burwell paper</u>	<u>Non-Burwell paper</u>	<u>Total</u>	<u>Percentage</u>
Word of mouth	209	30	14	253	44%
Received information directly from Sunnica Ltd	73	11	4	88	15%
Online	64	5	1	70	12%
Local media	80	18	3	101	17%
Other	58	8	0	66	11%
Total	484	72	22	578	

Q3 Did you receive a Sunnica Consultation Booklet?

<u>Response</u>	<u>Online</u>	<u>Burwell paper</u>	<u>Non-Burwell paper</u>	<u>Total</u>	<u>Percentage</u>
Yes	297	36	17	350	60%
No	187	36	6	229	40%
Total	484	72	23	579	

Q4 Were you aware of the same, and more, information on the Sunnica website (Sunnica.co.uk)?

<u>Response</u>	<u>Online</u>	<u>Burwell paper</u>	<u>Non-Burwell paper</u>	<u>Total</u>	<u>Percentage</u>
Yes	180	13	6	199	35%
No	299	51	16	366	65%
Total	479	64	22	565	

Q5 Were you made aware of the size/ acres/ hectares of the Sunnica scheme (over 2700 acres/ 1100 hectares)?

<u>Response</u>	<u>Online</u>	<u>Burwell paper</u>	<u>Non-Burwell paper</u>	<u>Total</u>	<u>Percentage</u>
Yes	251	16	11	278	49%
No	231	49	11	291	51%
Total	482	65	22	569	

Q6 Are you aware that the Sunnica scheme will take this area out of productive (arable) agricultural use for at least 30 years?

<u>Response</u>	<u>Online</u>	<u>Burwell paper</u>	<u>Non-Burwell paper</u>	<u>Total</u>	<u>Percentage</u>
Yes	305	37	18	360	63%
No	181	29	4	214	37%
Total	486	66	22	574	

Q7 – Did not concern the consultation

Q8 A number of matters were not included in the Sunnica Consultation Booklet, or few details were given.

Which of these do you consider important matters? (tick all that apply)

<u>Response</u>	<u>Online</u>	<u>Burwell paper</u>	<u>Non-Burwell paper</u>	<u>Total</u>	<u>Percentage</u>
Selection of the area chosen for the scheme	391	48	20	459	80%

Locations of existing solar farms already in this area - Within a 15 mile radius of the Sunnica scheme area there are already 11 solar farms operational, 9 more under/awaiting construction (as of June 2021).	386	49	18	453	79%	
Computer generated imagery of the visual impact of the scheme, including at different intervals (e.g. 1, 10 and 20 years)	344	41	16	401	70%	
Use of the land after 25 years (possibly up to 40 years) of use by the scheme	404	44	20	468	82%	
Guarantees of scheme removal and return to it's previous agricultural use once ended (and after no more than 40 years)	388	41	20	449	78%	

Road and lane widening through villages to accommodate the scheme	413	46	20	479	83%	
Footpath/ bridalway/ public right of way closures	427	50	20	497	87%	
Compulsory purchase/ leasing/ access of residents' land and property	411	51	21	483	84%	
Size, capacity and technology of the Battery Energy Storage Systems	407	49	20	476	83%	
Noise impact	n/a	42	18	60	61%	
Impacts on existing wildlife / ecology	439	55	20	514	90%	
Heritage and archaeological impacts	377	50	20	447	78%	
Total	475	76	23	574		

Q9 From the information provided by Sunnica in their Consultation Booklet, how easy was it for you to visualise the impact of the scheme?

Response	Online	Burwell paper	Non-Burwell paper	Total	Percentage	
Easy	54	6	2	62	11%	
Difficult	319	40	14	373	67%	
Other	101	13	6	120	22%	
Total	474	59	22	555		

Q10 If you accessed the online information on the Sunnica.co.uk website, how easy was it to find the information you were looking for?						
Response	Online	Burwell paper	Non-Burwell paper	Total	Percentage	
Easy	36	0	0	36	7%	
Difficult	186	7	6	199	36%	
Did not access the website	220	41	15	276	50%	
Other	29	6	2	37	7%	
Total	471	54	23	548		
Q11 Were you aware of the webinars that were held by Sunnica?						
Response	Online	Burwell paper	Non-Burwell paper	Total	Percentage	
I was unaware of the webinars	301	49	15	365	65%	
I was aware of the webinars but did not attend them	117	10	2	129	23%	
I attended some/all of the webinars	64	0	4	68	12%	
Total	482	59	21	562		
Q12 What is your view of the webinars? (tick all that apply)						
Response	Online	Burwell paper	Non-Burwell paper	Total	Percentage	
The webinars were an adequate replacement of physical meetings and exhibitions in villages	24	2	3	29	5%	

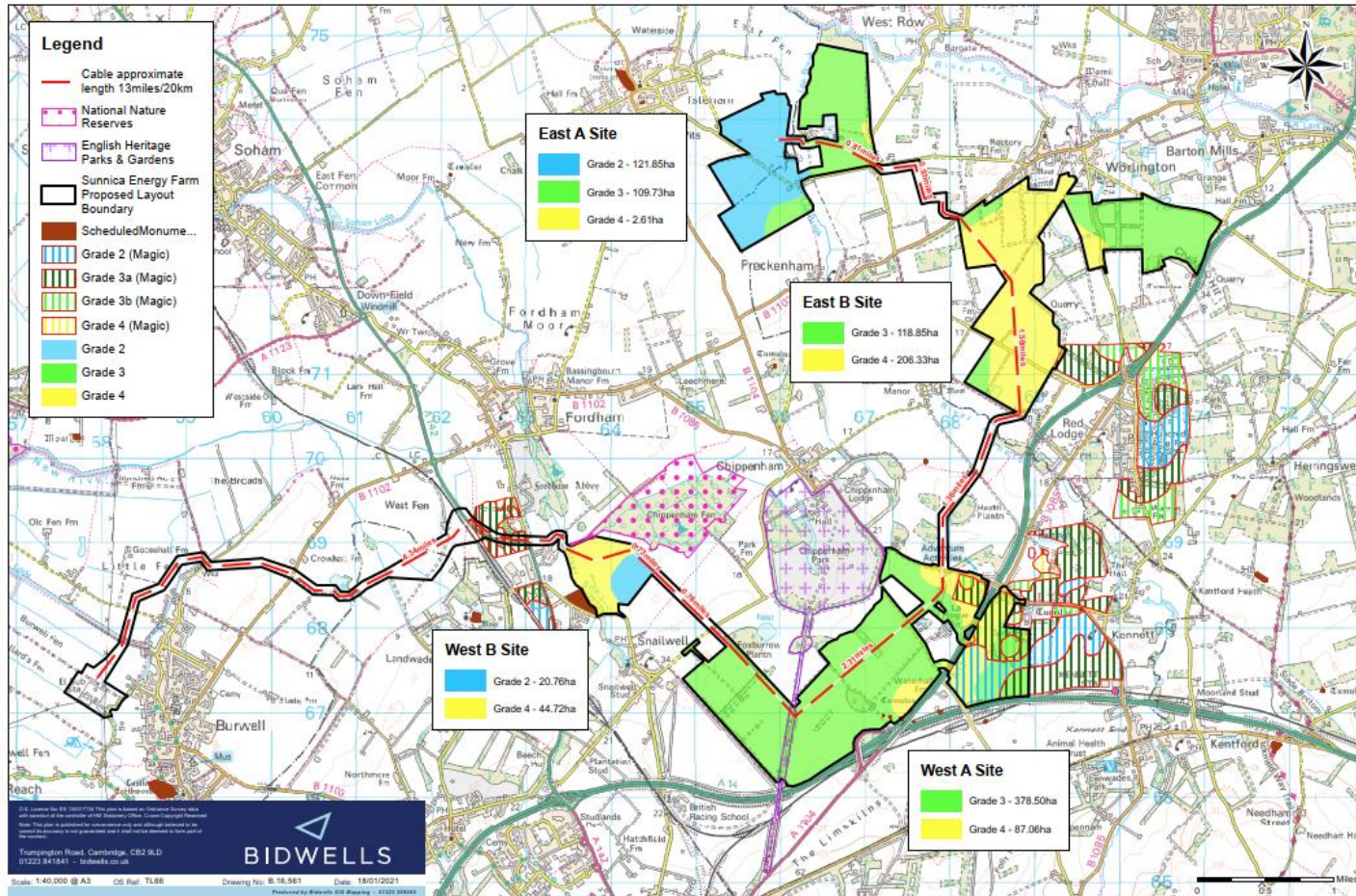
The webinars were not an adequate replacement for meetings/exhibitions in villages	162	6	6	174	32%	
I was able to ask questions and receive adequate answers about the scheme	8	0	1	9	2%	
I was unable to ask questions about the scheme	38	1	3	42	8%	
I was able to ask questions but did not receive adequate answers	38	0	1	39	7%	
I did not attend the webinars	297	27	6	330	60%	
Other (please specify)	62	6	6	74	13%	
Total	451	76	23	550		

Q13 Were you able to access the information in the PEIR (preliminary environmental information report)?						
Response	Online	Burwell paper	Non-Burwell paper	Total	Percentage	
Able to access	46	3	0	49	9%	
Unable to access	67	10	6	83	15%	
Unaware of the PEIR	368	40	16	424	76%	
Total	481	53	22	556		

Q14 In terms of statutory consultation what effect did the absence of meetings/ exhibitions or information displays in villages have on you? (tick all that apply)						
Response	Online	Burwell paper	Non-Burwell paper	Total	Percentage	
I could not understand the scheme properly	289	27	15	331	58%	
I was unable to ask questions about the scheme	240	26	14	280	49%	
I was unaware of the impact of the scheme on me	251	28	10	289	50%	
It had no effect on me	40	3	1	44	8%	
Other (please specify)	35	5	3	43	7%	
Total	475	76	23	574		
Q15 What effect did the Covid-19 restrictions and national lockdown have on your understanding of the scheme? (tick all that apply)						
Response	Online	Burwell paper	Non-Burwell paper	Total	Percentage	
I was unable to be consulted properly	318	29	15	362	63%	
I was unable to attend meetings in villages	268	17	10	295	51%	
It had no effect	72	13	2	87	15%	
Other (please specify)	24	3	1	28	5%	
Total	475	76	23	574		

Q16 Overall, do you feel that you were adequately consulted about the impact of the scheme?					
Response	<u>Online</u>	<u>Burwell paper</u>	<u>Non-Burwell paper</u>	<u>Total</u>	<u>Percentage</u>
Yes	39	1	1	41	7%
No	446	66	21	533	93%
Total	485	67	22	574	

Appendix 2 – ALC land classification within Sunnica Scheme



Appendix 3 - Analysis of November 2020 Webinar Q+A Sessions

The three Q+A webinar sessions were analysed with the following summary of responses:

Question Answered	133
Asker Referred to PEIR	11
Question will be answered later	32
Question not answered or deflected	67

Out of 243 questions, only 133 (55%) received a direct answer.

The questions asked and the response given (in summary) were as shown in Table 2. Where a question is deemed answered this does not imply the answer was acceptable, only that it was answered. Question to be answered later mostly referred to the DCO, but in some cases it might be at a later stage (construction or decommissioning)

The answers given by Sunnica are abridged and not verbatim. They communicate the essence of the answer given which, in some cases, may have been longer.

TABLE 2 - SUMMARY OF QUESTIONS AND ANSWERS IN Q+A WEBINAR SESSIONS

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
Are Sunnica still looking for Land?	Q+A 1	x				No
Can you tell us what E23 is?	Q+A 1	x				Proposed area of Solar near Worlington
Were other sites considered for the BESS and why were they not accepted?	Q+A 1			x		Will be produced in DCO
Please explain the BESS's and the connection at Burwell?	Q+A 1	x				About currents and inverting etc - technical
Have La Hogue pulled out?	Q+A 1				x	Conversations on going and private
What is the minimum viable size for Sunnica?	Q+A 1				x	"Confidential"
Will you disclose your business case?	Q+A 1				x	Upfront capital expenditure, Operational cost and potential revenues (mention 500 MW connection) (weekly commercial calls of people wanting to get involved)
Have you made it an NSIP to avoid local involvement? (lumped 3 smaller sites together)	Q+A 1	x				The size makes it an NSIP
How does Boris's wind promise effect Sunnica?	Q+A 1	x				Solar is part of the energy mix. Reality is the wind doesn't always blow
We have Great Crested Newts in Worlington - has this been noted?	Q+A 1			x		Yes and surveys on it will be published in DCO
Are you intending to import electricity from the national grid?	Q+A 1	x				We will, allowing us to offer a suite of grid balancing services.

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
Why can't we have a consultation where I can talk to people?	Q+A 1	x				Covid – you can phone us
We will need an evacuation for the primary school because of BESS's?	Q+A 1			x		Preparing a battery energy fire safety management plan (BEFSMP). (Claims large BESS's are widely used and experienced)
How high are the BESS's?	Q+A 1	x				Up to 6m
Can you list what is still undecided through the Rochdale envelope?	Q+A 1		x			Doesn't list them
Can you list the alternative sites?	Q+A 1			x		Will be in the DCO
Is solar not named by Boris because it isn't that green?	Q+A 1	x				Solar is bankable and everyone can get behind it
How long will it be before the carbon footprint of construction will be offset by the scheme?	Q+A 1				x	Haven't calculated this at this point but have calculated total energy generation and life cycle gas emissions.
Some of your substation schemes is going to be 8.5m high, 50m wide and 75m long? (Substations)	Q+A 1		x			Trying to limit that as much as possible but that is Rochdale envelope
Are the batteries just storing energy from Solar?	Q+A 1	x				No also from the electricity grid.
How many substations are there? And in which of the 4 areas?	Q+A 1		x			4 electrical compounds. Burwell, East site A and B and West site A
How will you ensure there is no child labour in the Cobalt you use?	Q+A 1				x	Don't want to support child labour so will take care when procuring its

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
						materials, but actually up to the funder
Do any of you live within 5 miles of the proposed site?	Q+A 1	x				No
Will batteries be double stacked? Are you worried about the risk to Red Lodge?	Q+A 1	x				No double stacking and BEFSMP
Can we have an updated image of La Hogue Road at 15 years?	Q+A 1				x	Confused about the question
Who is paying for decommissioning?	Q+A 1				x	The scheme will by setting aside security at some time through the scheme overseen by an independent but can't say when or how much
Is it true if the scheme goes ahead you can use CPO the land associated with cabling but not Solar panels?	Q+A 1	x				Aiming to reach voluntary agreements but CPO is available if DCO - can use CPO on ALL land
How many solar panels will be used?	Q+A 1				x	Not known
What changes have you made so far to the scheme as a result of resident's feedback?	Q+A 1	x				Scheme changed due to pre-consultation, also Landscape design (listened to local feedback)
Have RAF Lakenheath and Mildenhall been consulted yet?	Q+A 1	x				Luke says he 'thinks' they have been consulted. Danielle says they have spoken to MoD on behalf of them.
How few solar arrays will you need to ensure that energy trading Battery storage will be sufficiently profitable?	Q+A 1				x	Combination of a lots of things, complex relationship.

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
Does Sunnica now speak for the prime minister? (re previous question about Boris's commitment to wind)	Q+A 1	x				No they don't - Matt Just knows a lot about renewables
What will be the battery capacity storage at Burwell? Do you own the grid connect secured? Will you be buying electricity from the grid at Burwell?	Q+A 1	x				No installed capacity at Burwell Substation in relation to Sunnica's generating station. They have a bilateral connection agreement though, Yes, they will be buying but it is complicated.
IS Solar as effective as wind?	Q+A 1	x				Solar is very predictable and bankable
Have you found out the distance from schools to the BESS's?	Q+A 1				x	All about the fire safety plan. Closest schools (of 8) - 0.8 miles is the closest "well within a safe distance". But won't be their decision.
Can animals run beneath the panels? Will there be sheep?	Q+A 1	x				Sunnica's decision and yes they would like sheep
Are you planning east and west solar panels?	Q+A 1	x				Planning south facing solar panels
Is it possible to have the BESS without the panels?	Q+A 1	x				The dominant technology here is the solar panels- the batteries are a supporting system
Would schools need an evacuation plan?	Q+A 1	x				Don't think so but in BEFSMP if they need one
What extent of the battery capacity finalised?	Q+A 1				x	
Will the aspiration of grid balancing lead to an increase in proposed battery storage?	Q+A 1				x	

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How big is the largest battery in the world and what is ours in reference?	Q+A 1				x	Doesn't know, but isn't the largest proposed in the UK
What proportion of the battery storage will come from the Solar and what will come from the grid?	Q+A 1				x	Will evolve
Why shouldn't we postpone the consultation until it is OK to meet?	Q+A 1	x				Don't want to wait, they believe this is an appropriate way of consulting
What are the transport routes around Freckenham?	Q+A 1				x	
The fire safety plan should be published for us to see and comment and when will it be available?	Q+A 1			x		An outline is drafted
What kind of explosion would you expect from the batteries?	Q+A 1				x	Not a mushroom cloud
Will you be selling off the site after securing the DCO?	Q+A 1				x	"Irrelevant" will set out a funding statement, but not going to commit to anything but it will be invested in and owners today won't be the same throughout
Can you partially bury the 6m high battery storage systems?	Q+A 1	x				Have chosen not to
Why are the number of batteries and their capacities not listed?	Q+A 1			x		Rochdale envelope
How can we consult effectively without info?	Q+A 1	x				They have provided "a lot of information"

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Why won't you let us see the alternative sites? I don't see any harm in providing this	Q+A 1			x		This is what they have chosen to do, and they don't have to provide it
You didn't answer about the Schools evacuation plan.	Q+A 1	x		x		BEFSMP
If granted can you please guarantee me that all grass management will be done by sheep grazing as Matt said? Also that tractor mowing will not be used (Concern over wildlife in the grass).	Q+A 1	x				Will be in a management plan but no - cannot commit to just sheep.
When you calculated the greenhouse gas assessment did you include the environmental impacts of mining of lithium and Cobalt?	Q+A 1	x				Yes
Would you all prefer Sunnica or a nuclear plant on your doorstep?	Q+A 1	x				Sunnica - no longer pesticides and intensive farming - Luke was also shocked and worried about Chernobyl
Your previous answer about carbon offsetting wasn't good enough- Surely you must have a rough idea of your carbon offsetting otherwise how do we know it is green?	Q+A 1				x	The scheme calculates the carbon offset saved instead
Should it not be on a low value site not a high-value site?	Q+A 1				x	We don't assign a value the site, but think it is appropriate - it is up to the Secretary of state
When will the public be able to see the results of the consultation period?	Q+A 1	x				DCO

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Can we see the fire service response to the batteries?	Q+A 1			x		
Will the lithium come from ethically sourced mines? Can you ensure this?	Q+A 1	x				They "would like to avoid non-ethical sources" of these products. Household names and they are trying to ensure they are sourced responsibly. Standard needs to be met by funder, not them.
It sounds like the batteries will store power from dirty sources?	Q+A 1	x				Essentially yes
Will you be taking in power from the Solar panel schemes around burwell, if so do you need more panels?	Q+A 1				x	
Please can you explain the updates in the boundary changes? And the loss of some otherwise protected areas at Chippenham Fen?	Q+A 1	x				Notified people about them and changed for access reasons
Fire safety plan needs to be produced before the application.	Q+A 1			x		Not a static thing, will change.
So it is not green after all, you will be storing energy from fossil fuels?	Q+A 1	x				Yes
Will the cables you are leaving in the ground after decommissioning degrade and how long will it take?	Q+A 1	x				Made of metal, don't know how long decomposition will take
If Sunnica goes bankrupt will there be funding for decommissioning?	Q+A 1				x	There will be a security at some point

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I suggest it is 2.4 million panels is this correct?	Q+A 1				x	Won't know till final design, after application
Capacity of the three substations bar Burwell?	Q+A 1				x	Don't know
Is there a skeletal framework for the decommissioning environmental management plan?	Q+A 1				x	Produced much later in the scheme (5 years before decommissioning maybe)
Did the original red line alter because of the withdrawal of a landowner?	Q+A 1	x			x	Based on feedback
Will you provide drone footage of the site?	Q+A 1	x				Not for public consumption
Will you be providing information on battery safety and volatility to USAF Mildenhall?	Q+A 1			x		US bases will get an opportunity to comment at a later point
Where will you be sourcing water from?	Q+A 1				x	Exploring at the moment, Land owners reservoirs and Anglian Water are suggestions
Have you taken into account the importing of food which would have been grown on this land?	Q+A 1	x				No they haven't
Will this scheme be a precursor for other schemes across East Anglia, considering it is considered only moderately effective?	Q+A 1				x	
Matt is totally wrong to say Solar is totally predictable	Q+A 1	x				Solar is about light, and the sun comes up and goes down.
Is there scope to move the BESS's if they are unsafe?	Q+A 1	x				Won't be their decision really, would be at the suggestion of the SoS

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The safety of the installation should be the first point to consider not the last.	Q+A 1				x	Luke agrees but cannot state any of the safety measures yet
What testing and maintenance standards will you be upholding for panels? (Arcing and Fire)	Q+A 1				x	it is rare
Will you be using infrared cameras to check?	Q+A 1				x	Explains how they work
Do you have a contingency plan for the BESS locations?	Q+A 1	x				Don't expect safety concerns due to mitigation
What will be done to ensure locals are hired to work on the scheme?	Q+A 1				x	Looking at this but no commitment at the moment
How many residents live within the villages around Sunnica?	Q+A 1				x	Sent 10,500 booklets out but don't know how many people live in the area that they will be affecting
If the owners can change, who will be responsible for ongoing safety and who is liable for a major incident?	Q+A 1	x				The applicant and the company directors
How many people will be hired from local area?	Q+A 1	x				Couldn't remember the exact figure for the jobs created, but in the PEIR, but not necessarily local
The Rochdale Envelope makes Sunnica come across as not transparent.	Q+A 1	x				This is just the rules, and they think it is an intelligent way of managing change.
Is there any way you can bury the batteries?		x				We have decided not to do this.
IS there a way you could bury the batteries?	Q+A 2	x				You can but not feasible

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Why are you not admitting that the batteries are unsafe and unstable?	Q+A 2			x		Widely deployed across the world safety will be paramount in FSBMP
The ten point plan does not contain solar	Q+A 2	x				More recent document does include wind and solar
How can you explain all the fires and explosions in batteries?	Q+A 2				x	Learning curve at Grid level - will be learning from it
Have you ever considered a wildflower meadow in set aside?	Q+A 2		x			Yes, they will
How have you scoped the long-term development of the scheme, as it isn't part of the ten point plan?	Q+A 2	x				Will be part of the mix, don't think it will be obsolete, but others will be more effective potentially
I cannot believe you would have this on your doorstep and wind power exceeds solar	Q+A 2				x	No comment
We don't like Matt's save the world spiel, why don't you stop using him?	Q+A 2	x				It is the environment and everyone's spiel - a lot of people have the same opinion
It all comes down to a NSIP which will damage the land around here forever, how can you live with yourself?	Q+A 2	x				Sunnica are aiming to give a net benefit in terms of biodiversity, local socio-economics and the environment
Luke you know better than me that the scheme changed as a land owner pulled out, not because of feedback.	Q+A 2				x	One and the same
Do you feel uncomfortable with so many people opposed to this because you think you have NSIP backing?	Q+A 2	x				No- the level of engagement is a success of the consultation

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You seem to not be able to avoid child labour?	Q+A 2				x	To avoid 'where-possible' child labour, can't guarantee that
Matt what is the largest project you have managed to date?	Q+A 2	x				In US have 500MW projects but Sunnica is the largest
This answer on child labour is not good enough.	Q+A 2				x	Sunnica aren't part of the procurement project
How could this project be reduced in size as this is the big issue of this project?	Q+A 2	x				It won't be reduced
If the development of solar is ever improving will the tech not go out of date very quickly?	Q+A 2	x				Yes. but it won't be obsolete
I have emailed in to Sunnica multiple times and only some have been replied to, are you just answering easier questions?	Q+A 2	x				Takes a while to fact-check more technical questions, so can take a while
What role does Newgate Consultation have in the consultation? Why are our responses being sent to them?	Q+A 2	x				Experience in this field in tracking responses and DCO's, Sunnica doesn't have the capacity for it
How will you be outlining the responses to the consultation do you have to consider every point?	Q+A 2	x				All comments have to show due regard from the applicant
How can the statutory consultation continue without knowing alternatives (and other info), it is not effective	Q+A 2			x		Will be in the DCO
Sunnica claimed that they didn't know the answer to specific questions, yet having fully assessed the whole site they should know the	Q+A 2		x			Don't have the final design, have an indicative design (PEIR)

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answers, and therefore it seems they just don't what to tell us.						
If no batteries at Burwell, does that mean imported energy is sent all the way back to BESS's on sites? Is that not inefficient?	Q+A 2	x				Yes, but losses are marginal
What is the capacity of the BESS in MWh and what is area of battery storage?	Q+A 2			x		Info will be in DCO to a certain extent
Please advise on digging the trenches along the Fordham house court estate will impact businesses in Fordham? Concerned about Pollution, Noise and accessibility?	Q+A 2			x		Temporary disruption, but in the construction plan
I would like to know the impact of the scheme will have on local villages?	Q+A 2		x			Very general
How long will building take?	Q+A 2	x				About 2 years
Where will the workers live?	Q+A 2				x	Off-site but located within a certain area (Not sure what that is)- B and Bs and hotels
Where will the workers and lorries park?	Q+A 2	x				2 proposed car parks
Claim 994 jobs will be created in deconstruction but how can you assume this so far in advance and this seems an over assumption?	Q+A 2				x	Will go away and check
Have you included cost of decommissioning in your plans?	Q+A 2			x		Will be in decommissioning document and responsibility of the funder

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What will happen to the batteries requiring recycling before decommissioning statement is produced?	Q+A 2				x	Batteries can be up-cycled and repurposed etc, but most likely a new sector for recycling batteries- no mention of how they will do it
When is the development is complete, it will likely be sold on, what will they legally be bound to do?	Q+A 2	x				Bound to DCO
At the end of the scheme will the land change from green field to brownfield?	Q+A 2	x				No it won't
Have you signed up the landowners?	Q+A 2				x	In the process of completing the property agreement, but no legal obligation to say
Have you signed on the landowners along the cable route?	Q+A 2				x	Negotiating with landowners all the way along
How have you not considered whether the area is of high or low value in deciding the appropriate area?	Q+A 2	x				Consider value to society and value for wildlife.
You will be closing the right of way (Ickfield) which is vital to local services and so many people? How is this appropriate?	Q+A 2				x	Safety is important, and not sure if they will, or in time include it
Putting the commitment on the funder for avoiding child labour isn't good enough?	Q+A 2				x	Can't comment
Can you please define how loud construction will be and will there be a background hum through the scheme?	Q+A 2	x				90/110 decibels- similar to roadworks for construction. Batteries will make a noise.

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Will construction traffic travel through villages HGV? Will there be a plan in place to repair roads afterwards and will they be going through villages at 6am?	Q+A 2		x			In traffic plan and movements are broken down.
Will HGV's be using the street in Snailwell? And in what numbers?	Q+A 2	x				Yes, and one HGV a day most likely
You have split the sites up, have you considered other parts of the UK for this site?	Q+A 2				x	Scale of the need is dramatic
How big is the next biggest solar farm in the UK?	Q+A 2	x				Cleve Hill
Where has there been a scheme on this scale carried out before to determine long term health risks?	Q+A 2	x				Spain and China, but none on the scale of this in the UK
You say there will be no significant impact on health and well-being, please can you define significant?	Q+A 2				x	Uses methodology of health department, but considers holistic approach of during construction and operation
I am concerned about my drinking water? Have you consulted with Anglia Water and will there be ongoing assessment?	Q+A 2			x		Will be ongoing assessment, have consulted with Anglia water and will continue to do so. Piling isn't deep enough to contaminate water
How long after the solar panels are removed will it be appropriate for agriculture again?	Q+A 2	x				Almost immediately
What is Matt's role on an Essex solar project, etc?	Q+A 2	x				Matt owns other companies and is director on various schemes

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Can you commit to never using overhead towers for cabling?	Q+A 2	x				Currently putting all below ground.
How big are the main connection cables (Diameter, material and size)?	Q+A 2			x		Depends on markets and prices and specifications of the scheme
Please can you video the site on drone, both before and after construction?	Q+A 2				x	Good idea but not sure
Are there any plans to upgrade the road infrastructure as will be using small lanes?	Q+A 2			x		Could do, will be approved before construction
Matt please can you tell us about the financial status and experience of PS Renewables?	Q+A 2	x				One of the companies he owns, Padero Solares owns PS renewables, can find finance details on Companies House
Cable jointing chambers will be needed, how large are they? How many? Will they be dug up at the end?	Q+A 2	x				Mentioned in other webinars, will have to get back to you but (20mx5mx2m) and won't be dug up
The change of use from farming to solar will change the microclimate (Wind, temp, humidity etc)	Q+A 2	x				Not such a big problem in the UK - in Dubai, minimal change but not considered an issue
It is encroaching far too much on villages?	Q+A 2	x				Feedback taken onboard from previous consultations
Is your contribution to the national grid coming from Solar only?	Q+A 2	x				Generating electricity from the solar, but importing from the national grid
What additional economic advantages does Solar have over wind in the cold and windy UK?	Q+A 2				x	UK is good for solar

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Over 40 years as technology improves, is there a break clause that allows you to decommission before the 40 years?	Q+A 2	x				Yes, there is
Why aren't you buying these from the UK?	Q+A 2	x				Not made in the UK at a low cost
How many times will the batteries and panels need replacing in the scheme?	Q+A 2				x	Unsure, depends on the technology
There is a difference between renewable and sustainable energy, solar farms are being installed with no knowledge on how to recycle panels and batteries, creating a problem for the future.	Q+A 2				x	
China are using huge amounts of coal electricity to create solar panels.	Q+A 2					Feeds into the carbon calculations
Matt how many projects have you managed that have been completed?	Q+A 2	x				Over 30, look after over 300 projects
Seems to be growing opposition to this scheme and you seem unwilling to withdraw, can you at least apologise for the horrors you are imposing on the area?	Q+A 2					There is a need for these schemes
Can Matt and Luke answer if they have any connection to Paderos?	Q+A 2	x				Matt is co-owner
Can we see your safety plan for review? If not how is this an effective consultation? Very few people can be interested parties if they don't have this sooner?	Q+A 2			x		BFSMP is still in draft form

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Who are the big 6 (energy producers - Investors)	Q+A 2				x	Didn't say
Your proposal uses good farmland, north of Brandon is heath land which would be more appropriate?	Q+A 2			x		Methodology of alternatives in PEIR and more in DCO
Why is your project so big?	Q+A 2	x				Big need
Is this project only viable at this size due to the huge amount of cabling?	Q+A 2				x	Lots of factors
Would you buy houses in this area if it were so close to a scheme like this?	Q+A 2				x	Our aim to mitigate the visual impact
I have spoken to the older population of the village, who don't do webinars, why don't you wait and do it properly when we all meet?	Q+A 2	x				Don't know when Covid will end and this is deemed appropriate
All tech becomes obsolete.	Q+A 2	x				Yes it does, it will be the same here, it will serve out its purpose
This is the biggest project in Europe, either all the others lose money or this one could be smaller?	Q+A 2	x				There is a need
Why was the BESS relocated closest to Red Lodge?	Q+A 2	x				Deemed to be a good location- close to transport links, don't think it is very close to schools and residents.
If this scheme is deemed to be financially viable, what compensation can home owners receive due to property devaluation, not to mention not being able to sell them?	Q+A 2	x				Don't think it will impact the housing prices

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How would you all feel people were killed from a battery fire, or is this not your problem?	Q+A 2			x		It is the responsibility of the project, but it is very unlikely and BFSMP will be thorough.
Do Newgate Comms have a comprehensive media monitoring system in place?	Q+A 2	x				Yes
If we need batteries put them well away from people if they aren't safe.	Q+A 2				x	
Isn't this just a tick box exercise for you and just talking and not listening?	Q+A 2	x				Untrue- we will be responding to feedback
How can you say the PEIR is comprehensive if you haven't provided information?	Q+A 2			x		The PEIR isn't meant to be final, more in DCO
If the farm is built, would Sunnica like to buy my house off me at the market rate and send their children to the school 1km away from the BESS.	Q+A 2	x				Won't buy people's houses but yes Matt would live near the BESS
Your idea that we will all be using electric cars is wrong- get real, we will be long beyond this tech by the time this scheme is completed.	Q+A 2					Electric car revolution is coming.
Can you please ask Luke to stop talking about alternatives methodology, show us the list.	Q+A 2			x		Will be in the DCO
Roughly how many panels can go on one acre of land?	Q+A 2				x	Changes, but will come back to that.
What is the highest structure on the sites?	Q+A 3	x				Burwell substation - could be up to 12m in height

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If you can serve section 172's and get DCO to grant CPO does that mean the scheme can go ahead with no landowners permission?	Q+A 3				x	Talked about section 172's for access but did not say whether the scheme could go ahead without permission but get CPO if strong case so - YES
Does Sunnica expect to be granted gov subsidies?	Q+A 3	x				Funded privately
Why have you not included the inevitable fall in housing prices in the socio-economic impacts report?	Q+A 3	x				No evidence to say housing prices fall
What are the socio-economic benefits for locals?	Q+A 3		x			Construction jobs, however, this is at the discretion of the construction contractor
Construction jobs will only be temporary what benefits are there?	Q+A 3		x			Full- time jobs (4) and access to the scheme, internships, apprenticeships and business rates
So will the people currently employed on the farmland will be offered jobs on Sunnica?	Q+A 3	x				No, spoke with farmers and their operations are flexible so little impact
Is it true La Hogue have pulled out?	Q+A 3	x				Confidential
What are the safety records in terms of expected accidents, injuries and death? What do you predict for this including panels, cabling, batteries and road accidents?	Q+A 3				x	Haven't got a health and safety plan
Are you going to answer the left-over questions from last week?	Q+A 3	x				They are going to be answered on our website - we don't have time

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This scheme will not be decommissioned, it will merely be updated, will the jointing cables be in concrete?	Q+A 3	x				Don't know about concrete, but don't think the scheme will go beyond 40 years
What are the benefits for the local communities?	Q+A 3		x			Access, supply chain, skills, business rates
Already a small solar farm in Burwell, why can't you put the solar farm there where there is no residential property?	Q+A 3	x				Methodology for site selection
Why is it this big?	Q+A 3	x				Need it for the environment
Employment- so you will just employ people for 2 years and then lose jobs for local farmers?	Q+A 3	x				Farming system is flexible, and hiring 900 people during construction
Will permissive paths replace footpaths, how will you ensure access for people?	Q+A 3	x				Will be secured under property agreements
Matt how big are the solar projects you run? Are they also ruining countryside?	Q+A 3	x				50 kw to 50 MW SF's and they are next to people's houses
Have you spoken to the people injured in the Arizona battery fire?	Q+A 3			x		Creating outline BSFMP
Why have you not postponed the consultation till we can meet face to face?	Q+A 3	x				Guidance saying keep going as we will need these projects to help the economy and didn't know about the vaccine
There have been several fires from BESS's, it is misleading to say these schemes are safe.	Q+A 3			x		Creating a fire risk safety plan for the DCO

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I have solar panels on my roof and given their size can I deduce there will be 1.6 million solar panels?	Q+A 3	x				Panels have increased in capacity, Matt estimate 1.1 million
Have you considered the loss of biodiversity on the site? What do you have to show for biodiversity for the DCO?	Q+A 3		x			Have done extensive testing and in the PIER
What material will the underground cables be made of?	Q+A 3	x				A metal, wrapped in protective materials
After decommissioning of the panels, will they be updated with new panels?	Q+A 3	x				No, panels degrade 0.5% a year but can't see them replacing them
Under the compulsory purchase issue, you are acting as other infrastructure providers, I am aware in other large schemes funding has been made available for communities to access to improve local facilities, has this been considered and rejected?	Q+A 3	x				Considering how the scheme can provide benefits other than money- emphasis on skills and legacy benefits, don't know about that yet though
Also why is Sunnica relying on landowners to provide the benefits of paths?	Q+A 3				x	
This is a farce - avoiding us and stifling our voices and blaming it on Covid	Q+A 3	x				Put it in your consultation feedback.
Which species will lose the most through this scheme?	Q+A 3	x				Created specific mitigation sites and where there are impacts they will try to mitigate adverse impact and enhance biodiversity

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The largest landowner in the scheme is also in the industry of solar, is this why you sited Sunnica here?	Q+A 3			x		Alternatives methodology for assessment in DCO
Do you think the UK's solar need could be met by using rooftops and not green land?	Q+A 3	x				No, we need lots more
If this goes ahead, will Matt and Luke be willing to put their money into charities to help the community they are damaging?	Q+A 3				x	No they won't but community benefits strategy may be considered
You will be releasing Carbon in construction. Seems like a waste of good farmland as we need to farm for food.	Q+A 3	x				Net emission reduction gain, need to find other land to farm, also providing food (through sheep)
Is it not true that the larger the scheme, the more money you will make? It isn't green after all	Q+A 3	x				We live in a capitalist society - so yes
What proportion of the jobs you create will be fulfilled by people from the villages your scheme most effects?	Q+A 3				x	3/4 jobs based on the 'travel to work' area assumption but just an estimate and will be decided by the contractor so no commitment
PIER states all traffic accessing East Site A through Worlington- already very busy, small junctions etc?	Q+A 3			x		Specialists will look at this at the next stage but so far it is assumed
You are saying the outputs of the farms you have but you aren't saying the areas covered?	Q+A 3				x	Doesn't know
Are you able to say how many people have attended the webinars throughout?	Q+A 3			x		Will be in consultation report

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The electricity from the panels will go from the panels to the national grid or BESS's, will it flow back?	Q+A 3	x				Yes can export and import electricity
When the panels are delivered to site, how many panels can come in a single lorry?	Q+A 3	x				Come double stacked - four quads double stacked - 60 in a crate
Panel technology is advancing, therefore will you shrink this site and move it back from villages?	Q+A 3	x				No- in some cases they have set back panels 100's of meters from villages but are going to maximise grid connection
Before you decided to carry out the virtual consultation, how did you assess what proportion of the population would be able to access the online information?	Q+A 3	x				Had meetings with officers from local authorities, set up a working group, not just virtual, went out 10,500 copies of consultation and phone calls
Will the cable be cooper or aluminium, what will the wrapping be and how long will it take to decompose?	Q+A 3	x			x	Not sure if copper or aluminium, depends on pricing, wrapping will be protective sheath but depends on material
When you count your webinar - not all these webinar people are unique, every week, this will not be the total number of people engaged.	Q+A 3	x				Taken onboard and webinars are just one part of it.
Matts comment on inefficiency is misleading - they are not 50% efficient.	Q+A 3	x				This is talking about aging of the panels
What will happen to the substation extension at the end of the project? Will you sell it?	Q+A 3	x				Will be decommissioned, but if still working National grid might seek to maintain it if it is still operational

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
Skilled electricians have done 4-year apprenticeships and higher training, apprenticeships for the scheme would take 3-5 years and therefore very difficult, meaning low levels of training and low skill impact.	Q+A 3	x				Strongly push back on this- exciting feedback from West Suffolk college etc
Would you be considering building local recreational building such as gyms etc and run them from the power of your plant?	Q+A 3	x				No - they wouldn't be providing power to locals
Can you work with local owners to build a temporary access road from East Site A to B? So high traffic doesn't have to go through Worlington?	Q+A 3			x		Are still evaluating
How can you say legacy when the scheme will be decommissioned in 40 years/ will they then have to retrain?	Q+A 3	x				No can take skills elsewhere
This is not rewilding- that is resulting in bushes and trees, not mown grass.	Q+A 3				x	
I thought sustainability meant eating locally sourced food and not livestock?	Q+A 3	x				Some of the land already being used for livestock
There is already harm to Community - money and time spent and local anxiety and upset in the community- I don't see any local benefit.	Q+A 3				x	
Matt Hazel- which environmentalists encouraged you to build massive solar farms on agricultural land?	Q+A 3	x				David Attenborough, the news, etc

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
If you don't answer the Tilbrook Question about La Hogue then you are actively encouraging a boycott of them?	Q+A 3	x				Doesn't change anything
Do you have any interests in other solar farms of this scale in the UK?	Q+A 3	x				Luke - not that I want to discuss, Matt - yes
How can you live with yourselves, ruining the safe, beautiful environment we chose to live in to raise our children.	Q+A 3	x				Proud of what they do
We know the Walnut Tree junction is very narrow and Mildenhall to Burwell is already failing. Please can you make sure you don't bring gridlock to our streets?	Q+A 3			x		Will look into at the next stage
What is the lifetime of solar panels? And batteries?	Q+A 3	x				Over 40 years for panels, batteries will be 4/5 years
Matt who will be making these panels for you?	Q+A 3	x				Depends on technology provider
They are less than 150 yards from my house, the panels.	Q+A 3	x				That is a long way away
Would it be possible to import electricity when it is cheap and then sell it back when it is more expensive?	Q+A 3	x				Yes
You must admit that the substation might not be decommissioned if the grid wish to keep it?	Q+A 3	x				Yes, but the national grid would have to put in an application - Sunnica don't own the land.

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
We have increasing numbers of home workers, how will Sunnica ensure they will not disrupt internet and connectivity?	Q+A 3			x		These cables will be identified
The very obvious community benefit would be to keep the land as agriculture	Q+A 3				x	
Are you saying the pigs on the land at present will be allowed through the panels?	Q+A 3	x				Not pigs, too good at digging.
The community has not said it is against solar panels in the field, it is too big, too much guess work, it is like a big jigsaw puzzle.	Q+A 3				x	

From: [REDACTED]
To: [Sunnica Energy Farm](#)
Cc: [Lance Stanbury](#); [Brian Harvey](#)
Subject: Sunnica Adequacy of Consultation
Date: 05 December 2021 17:11:26
Attachments: [SunnicaAdequacy of Consultation.doc](#)

To: To sunnica@planninginspectorate.gov.uk

Please find attached our submission relating to concerns on inadequacy of the Sunnica Consultation.

Thank you.

Mr and Mrs MSP Stone

CC Matthew Hancock MP and Lucy Fraser MP House of Commons, London SW1A 0AA

County Councillor Lance Stanbury lance.stanbury@suffolk.gov.uk

District Councillor Brian Harvey brian.harvey@westsuffolk.gov.uk

[Email:](mailto:sunnica@planninginspectorate.gov.uk)

To: sunnica@planninginspectorate.gov.uk

Sunnica :- Adequacy of Consultation.

Pre-Application Process The consultation period was too short and poorly advertised. Information was posted to residents in plain white envelopes which meant that many were unaware of the important contents, and simply discarded as irrelevant marketing information. The design of the leaflets was poor – small text and lack of description about the proposal. A similar lack of detail in the local press. Consultation events were not signposted or advertised outside the venues, in advance or on the day. Villages adjoining the sites had only days to respond to the scheme before the closing date. This lack of time, clarity and engagement resulted in a failure to present the true impact on local communities. It was apparent that Newgate Communications failed to raise the profile of Sunnica or engage meaningfully with the affected local people, and the consultation was totally inadequate.

Sunnica Consultation Process – 22nd September – 2nd December 2020

Due to the Covid 19 Pandemic Sunnica avoided meaningful face to face consultations in the community. Poor attendance at the webinars confirmed the difficulties experienced with technology. The on-line consultation document was not easy to navigate. Many of the older members of the communities affected by these plans, had long associations with their villages and cared passionately about their environment. They were unsure of the technology, the webinars and the cold phone calls and felt excluded from the process.

Presentation of the boundary of the scheme in the Sunnica Consultation Booklet was confusing. The use of grey ink was a poor medium whereas black ink would have enhanced detail and definition. The removal of town and village names from the Parameter Plans for Sunnica East A and B and Sunnica West A and B, and the failure to declare the acreage of each site was unhelpful and again failed to present the true impact of the proposals.

There was a failure to answer written questions in a timely manner to allow for cross examination. Sunnica placed too much emphasis on referral to sections in the on-line Consultation Document, rather than giving a direct answer. Written and oral questions were answered from the point of view of Sunnica's interpretation and made no allowance for the residents' viewpoint.

Documentation - Sunnica consultation booklet was not delivered to all households by the start date of the consultation. Updates on 7th November changed the original format and volume of information presented at the start of the consultation.

Presentation of the Construction Management Plan was based on proposed routes for construction traffic. This made it difficult to interpret the impact upon the current infrastructure and the villages adjoining the final planned route. In addition, Sunnica's lack of involvement with the County Council Highways Department during their preliminary hearings, demonstrates a total disregard for the affected communities.

It was disappointing that there was a failure to provide mock ups to show the size and scale of this project during the consultation period for this nationally significant infrastructure project and its enormity.

The Consultation made no reference to plans for decommissioning. The hazardous materials used in construction will not be easy to recycle and will affect future generations. A decommissioning bond must be funded up front, not financed in the later years of the scheme. There must be a guarantee that the burden of decommissioning does not fall on the local authorities.

In conclusion Sunnica continues to be evasive about their commitment to the villages and communities that their project will engulf. Given the long term nature of the proposals, and the on-going pandemic Sunnica should be required to delay submission of their application until residents can consider the scheme safely and properly, and have the opportunity to influence these important decisions which will affect these communities for the next 40 odd years, and indeed their rural landscape will blighted forever. The scheme is being rushed through whilst the local residents are still concentrating on their health and livelihoods.

THIS APPLICATION SHOULD NOT BE ALLOWED TO PROCEED TO THE EXAMINATION PHASE, UNTIL A MEANINGFUL AND THOROUGH CONSULTATION HAS BEEN UNDERTAKEN WITH THE LOCAL COMMUNITY WITHOUT THE EXCLUSION OF THOSE WHO ARE UNABLE TO EMBRACE MODERN TECHNOLOGY, AND/OR THOSE WHO HAVE BEEN WORRIED ABOUT MEETING IN ENCLOSED SPACES DUE TO COVID RISKS.

ON BEHALF OF MR & MRS M S P STONE

CC Matthew Hancock MP and Lucy Fraser MP House of Commons, London SW1A 0AA

County Councillor Lance Stanbury lance.stanbury@suffolk.gov.uk

District Councillor Brian Harvey brian.harvey@westsuffolk.gov.uk

From: [REDACTED]
To: [Sunnica Energy Farm](#)
Subject: Sunnica proposed site
Date: 05 December 2021 19:00:53

Dear Sir/Madam

I object to the lack of consultation with local people, like myself, regarding the proposed Sunnica development of a solar energy plant near to the villages of Worlington, Isleham and Freckenham in Suffolk.

The proposed development is rumoured to be being seriously considered to change the existing arable and livestock farm land to be altered to a large solar energy plant.

There appears to be little engagement with the people who live and work here.

Yours faithfully

Daniel Smith

From: [REDACTED]
To: [Sunnica Energy Farm](#)
Subject: Sunnica, Worlington
Date: 05 December 2021 19:03:43

Dear Sir/Madam

I object to the lack of consultation with local people, like myself, regarding the proposed Sunnica development of a solar energy plant near to the villages of Worlington, Isleham and Freckenham in Suffolk.

The proposed development is rumoured to be being seriously considered to change the existing arable and livestock farm land to be altered to a large solar energy plant.

There appears to be little engagement with the people who live and work here.

Yours faithfully.

Jan Smith