



SUNNICA ENERGY FARM

EN010106

Volume 5

Reports/Statements

5.1 Consultation Report (demonstrating compliance with Sections 47-49)

APFP Regulation 5(2)(q)

Section 37(3)(c) Planning Act 2008

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



Planning Act 2008

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

**Sunnica Energy Farm
Development Consent Order**

Consultation Report

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1 Introduction

1.1 Purpose of this document

- 1.1.1 This Consultation Report relates to the proposed Sunnica Energy Farm (the Scheme). In seeking the legal powers to construct the Scheme, Sunnica Ltd (the Applicant) is making an application for a Development Consent Order (DCO) to the Secretary of State. Section 37(3)(c) of the Planning Act 2008 (PA 2008) requires the Applicant to submit this Consultation Report as part of our application.
- 1.1.2 The Scheme meets the criteria to be considered as a Nationally Significant Infrastructure Project (NSIP) under the PA 2008. The Scheme is a 'generating station' NSIP under section 15(2) of the PA 2008 (as amended) as it is a proposed generating station which would be within England, would not be offshore, and would have a total generating capacity of more than 50MW.
- 1.1.3 The Applicant recognises the importance of consulting on the proposed development at an early stage in the Scheme development, and the benefits this can bring in terms of delivering an improved scheme. This Consultation Report will explain how the Applicant has complied with the consultation requirements set out in the PA 2008, as well as the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (APFP Regulations), and Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations 2017). Guidance about the report and the pre-application process, including statutory consultation, is found in the Department for Levelling Up, Housing and Communities' (DLUHC) document *Planning Act 2008: guidance on the pre-application process (March 2015) (DLUHC pre-application guidance)* and the Planning Inspectorate's Advice Note Fourteen: Compiling the Consultation Report.
- 1.1.4 The primary function of this Consultation Report is to provide evidence to the Planning Inspectorate about the Applicant's compliance with the requirements of the pre-application procedure.
- 1.1.5 As stated in DLUHC pre-application guidance, the Consultation Report should:
- “provide a general description of the consultation process undertaken, which can helpfully include a timeline;*
 - set out specifically what the applicant has done in compliance with the requirements of the Planning Act, relevant secondary legislation, this guidance, and any relevant policies, guidance or advice published by Government or the Inspectorate;*
 - set out how the applicant has taken account of any response to consultation with local authorities on what should be in the applicant's statement of community consultation;*
 - set out a summary of relevant responses to consultation (but not a complete list of responses);*
 - provide a description of how the application was informed and influenced by those responses, outlining any changes made as a result and showing how significant relevant responses will be addressed;*
 - provide an explanation as to why responses advising on major changes to a project were not followed, including advice from statutory consultees on impacts;*

where the applicant has not followed the advice of the local authority or not complied with the guidance or any relevant Advice Note published by the Inspectorate, provide an explanation for the action taken or not taken; and

be expressed in terms sufficient to enable the Secretary of State to understand fully how the consultation process has been undertaken and significant effects addressed. However, it need not include full technical explanations of these matters”.

1.2 Consultation context

- 1.2.1 The Scheme is located within the administrative areas of Cambridgeshire County Council and Suffolk County Council at a county level and East Cambridgeshire District Council and West Suffolk Council at a district level.
- 1.2.2 Parts of the Scheme are located in or close to the parishes of Freckenham, Worlington, West Row and Red Lodge in Suffolk, and Isleham, Chippenham, Snailwell, Fordham, Exning, Kennett and Burwell in Cambridgeshire.
- 1.2.3 Of these, Red Lodge (population 3,834), Burwell (population 6,309), Fordham (population 2,712) and Isleham (population 2,100) are the largest. These were the only parishes including part of the Scheme that had a population greater than 1,000 at the last census.
- 1.2.4 The context for the Scheme is predominantly rural. In its analysis of social segmentation, for example, Suffolk Observatory identifies the populations of Freckenham and Worlington as falling into category A – Country Living and category G – Rural Reality.¹
- 1.2.5 Demographically, the local community mirrors broader trends within Cambridgeshire and Suffolk. It is older on average and has a higher proportion of residents who gave their ethnicity as White British at the last census, but not significantly.
- 1.2.6 21% of the population of Fordham and Isleham ward, for example, is aged over 65 and 97% identified as White British, compared with 19.2% and 92.6% respectively across Cambridgeshire.²
- 1.2.7 The nearest larger towns to the Scheme are Mildenhall to the north east and Newmarket to the south west. The US Air Force base at RAF Mildenhall remains important to the local economy, while Newmarket is a national centre for the horse racing industry.
- 1.2.8 Internet access is widespread in both Cambridgeshire and Suffolk. According to local authorities, superfast broadband coverage has reached 99% of households in Cambridgeshire and 98% in Suffolk.
- 1.2.9 The Applicant identified seldom heard audiences in the area as including those without internet access, young people, older people, Gypsies and Travellers, the time poor, the economically challenged, ethnic minorities, and LGBT+ people.
- 1.2.10 The statutory consultation period coincided with the COVID-19 pandemic. This meant that consultation was carried out in a remote manner consistent with

¹ Suffolk Observatory, Area Reports. At the time of publication, these were available from the Suffolk Observatory's website.

² Cambridgeshire Insight, Area Reports. At the time of publication, these were available from the Cambridgeshire Insight website.

Government requirements for social distancing. Further detail is set out in chapter 4 of this report.

1.3 Summary of consultation activities

1.3.1 **Table 1-1** provides a summary of consultation activities, including non-statutory consultation, ongoing engagement following the non-statutory consultation, and statutory consultation.

Table 1-1 Summary of consultation activities

Consultation Activity Undertaken	Date
Non-statutory consultation: Q2 2019 – Q2 2020	
Early engagement with local authorities and statutory consultees (Section 2.2)	February 2019 – June 2019
Non-statutory public consultation (Sections 2.3 – 2.5)	17 June 2019 to 28 July 2019
Ongoing stakeholder engagement to inform design development (Section 2.6)	June 2019 – September 2020
Statutory consultation: Q3 2020 – Q4 2020	
Consultation of host local authorities on the Statement of Community Consultation (SoCC) as prescribed by s47(3) of the PA 2008 (Section 4.2)	3 August 2020 – 1 September 2020
Notice of availability of SoCC in the vicinity of the proposal as prescribed by s47(6) of the PA 2008 (Section 4.2)	17 September 2020
Proposed application publicised as prescribed by s48 of the PA 2008 (Section 4.6)	17 September 2020 and 24 September 2020
Notification of the Inspectorate of proposed application as prescribed by s46 of the PA 2008 (Section 4.4)	16 September 2020
SoCC made available in the vicinity of the proposal as prescribed by s47(6) of the PA 2008 (Section 4.2)	17 September 2020 – 18 December 2020
Consultation as prescribed under s42 of the PA 2008 (Section 4.3)	22 September 2020 – 18 December 2020

Consultation in accordance with the SoCC as prescribed under s47(7) of the PA 2008 (Section 4.5)	22 September 2020 – 18 December 2020
Ongoing engagement Q1-Q3 2021	
Ongoing engagement with local authorities, statutory consultees and the public (Section 4.9)	18 December 2020 – 29 September 2021
Community update newsletter detailing changes since statutory consultation (Section 4.9)	16 August 2021
Further consultation: Q2-3 2021	
Targeted consultation with relevant consultees under s42(1)(d) of PA 2008 on changes to the Scheme boundary (Chapter 5)	18 June 2021 – 8 November 2021

1.4 Covering letter and completed section 55 checklist

- 1.4.1 A covering letter and completed s55 checklist is submitted within the application documents [EN010106/APP/1.4].
- 1.4.2 The completed s55 checklist provides evidence of compliance with the pre-application consultation requirements within the PA 2008, APFP Regulations, EIA Regulations 2017, and the DLUHC pre-application guidance.

2 Non-statutory consultation

2.1 Overview of the non-statutory consultation

- 2.1.1 The Applicant conducted extensive consultation outside of the statutory consultation period. This included a period of non-statutory consultation on the Scheme between 17 June 2019 to 28 July 2019. This consultation took place having regard to the same principles as the statutory consultation carried out under the PA 2008, with reference to the DLUHC guidance on the pre-application process (March 2015) set out in **Table 7-1**.
- 2.1.2 The purpose of this period of non-statutory consultation was to support the design development and the process of environmental impact assessment by gathering feedback from consultees on the Scheme at an early stage in the design process.
- 2.1.3 This chapter sets out the consultation and engagement activity conducted by the Applicant outside of the period of statutory consultation.

2.2 Early engagement

- 2.2.1 Prior to the non-statutory consultation, the Applicant engaged with host local authorities, relevant statutory consultees, and other stakeholders to introduce the Scheme, seek early feedback, and develop the scope and methodology for the non-statutory consultation. Details of these meetings are set out in **Table 2-1**.

Table 2-1 Summary of early engagement

Stakeholders met	Date	Topics discussed
East Cambridgeshire District Council	13 February 2019	An initial meeting with planning officers to introduce the Scheme and project timescales.
Highways England	18 February 2019	An initial meeting to introduce the Scheme and project timescales prior to the submission of the EIA Scoping Report.
Suffolk County Council	19 February 2019	An initial meeting with planning officers to introduce the Scheme and project timescales.
Historic England	20 February 2019	An initial meeting to introduce the Scheme and project timescales prior to the submission of the EIA Scoping Report.
Jockey Club	6 March 2019	An initial meeting to introduce the Scheme and understand potential interactions with the horse racing industry in Newmarket.
West Suffolk Council	18 March 2019	An initial meeting with planning officers to introduce the Scheme and project timescales.
Jockey Club	20 March 2019	A site visit to the Lime Kiln Gallops.
Cambridgeshire	25 March 2019	An initial meeting with planning officers to

Stakeholders met	Date	Topics discussed
County Council		introduce the Scheme and project timescales.
Worlington Parish Council	3 April 2019	A meeting to introduce the Scheme and project timescales.
Freckenham Parish Council	3 April 2019	A meeting to introduce the Scheme and project timescales.
Cambridgeshire County Council	9 April 2019	A briefing with Cllr Steve Count, Leader of Cambridgeshire County Council, to introduce the Scheme and project timescales.
Cambridgeshire County Council, East Cambridgeshire District Council, Suffolk County Council, West Suffolk Council	23 April 2019	A meeting with planning officers to discuss the proposed approach to non-statutory consultation.
Lucy Frazer MP	24 April 2019	A meeting to introduce the Scheme and project timescales.
Red Lodge Parish Council	21 May 2019	A meeting to introduce the Scheme and project timescales.
Highways England, Cambridgeshire County Council and Suffolk County Council	3 June 2019	A meeting to discuss access options and the Applicant's approach to transport assessment.

- 2.2.2 The initial engagement set out in **Table 2-1** informed the early development of the Scheme, the approach taken by the Applicant to Environmental Impact Assessment (EIA) scoping and approach taken to the non-statutory consultation set out in this chapter.
- 2.2.3 The Applicant also introduced the Scheme to the local community prior to the commencement of the non-statutory consultation. This involved issuing an introductory leaflet to all addresses within the two areas shown in **Figure 2-1** on 13 March 2019 and launching a Scheme website. These areas were considered proportionate to the size of Sunnica East and West at that stage in the development of the Scheme, at 1.4 square miles and 1.1 square miles respectively. A copy of the leaflet is included in **Appendix A-1** and evidence of the website in **Appendix O-1**. At this stage, the website included an overview of the site location, the need for the Scheme and the planning process for the Scheme.
- 2.2.4 The purpose of contact with the local community at this stage was to introduce the Scheme to people living in the immediate vicinity of Sunnica East and Sunnica West, to make them aware of the upcoming non-statutory consultation.

- 2.2.5 The Applicant contacted elected representatives for the area included in **Figure 2-1** to share a copy of the leaflet. This included members of Chippenham Parish Council, Freckenham Parish Council, Worlington Parish Council, Red Lodge Parish Council, Forest Heath District Council, East Cambridgeshire District Council, Suffolk County Council and Cambridgeshire County Council, and also Lucy Frazer MP and Matt Hancock MP.

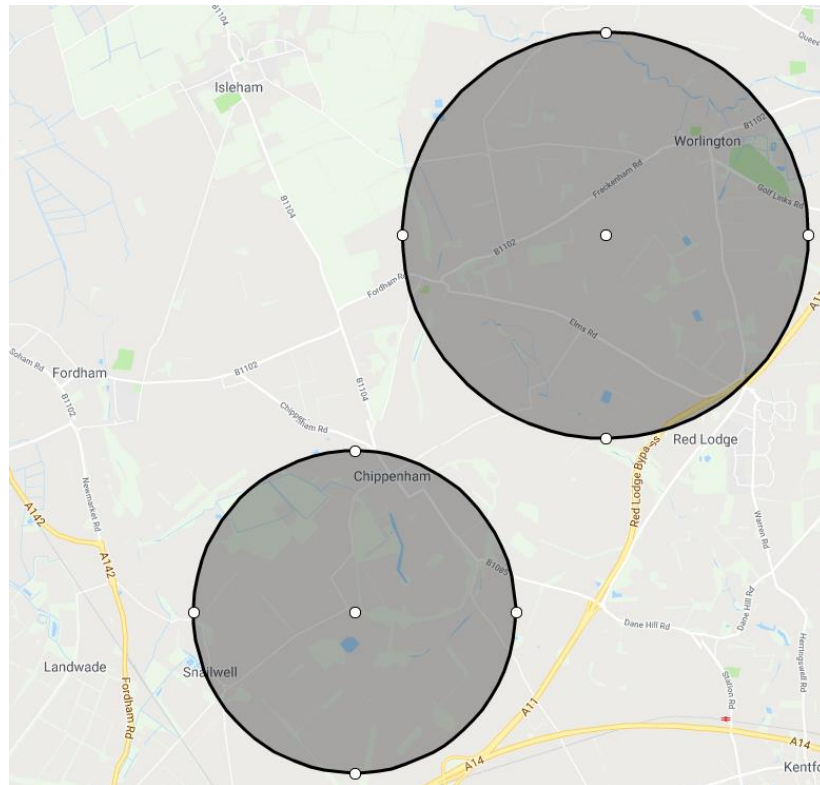


Figure 2-1 Distribution area for introductory leaflet (615 addresses)

2.3 Scope of the non-statutory consultation

- 2.3.1 The Applicant conducted a period of non-statutory consultation between 17 June 2019 to 28 July 2019.
- 2.3.2 As part of the non-statutory consultation, the Applicant presented information on:
- The background to the Scheme;
 - The Applicant;
 - The site proposed for the Scheme;
 - Technology to be used in the Scheme;
 - The need for development;
 - Initial proposals for development, including the Scheme overview plan included at **Figure 2-2**;
 - The EIA process and environmental constraints relevant to Sunnica West and Sunnica East;
 - The planning process for NSIPs;
 - How to take part in the non-statutory consultation; and,
 - The timeline for development.

- 2.3.3 Through the non-statutory consultation, the Applicant sought consultees' views on:
- Potential considerations relevant to the design of Sunnica East, the design of Sunnica West, the design of the cable route, and environmental impacts;
 - Its proposal to bury cables underground and the indicative route of the cables;
 - Whether the battery energy storage system (BESS) should be concentrated at a single location or distributed across several locations;
 - Whether there was any information relevant to the Scheme or the local environment that the Applicant should take into account;
 - Any specific local enhancements that could be included in the Scheme; and,
 - Any specific information it would be helpful to include as part of the statutory consultation.

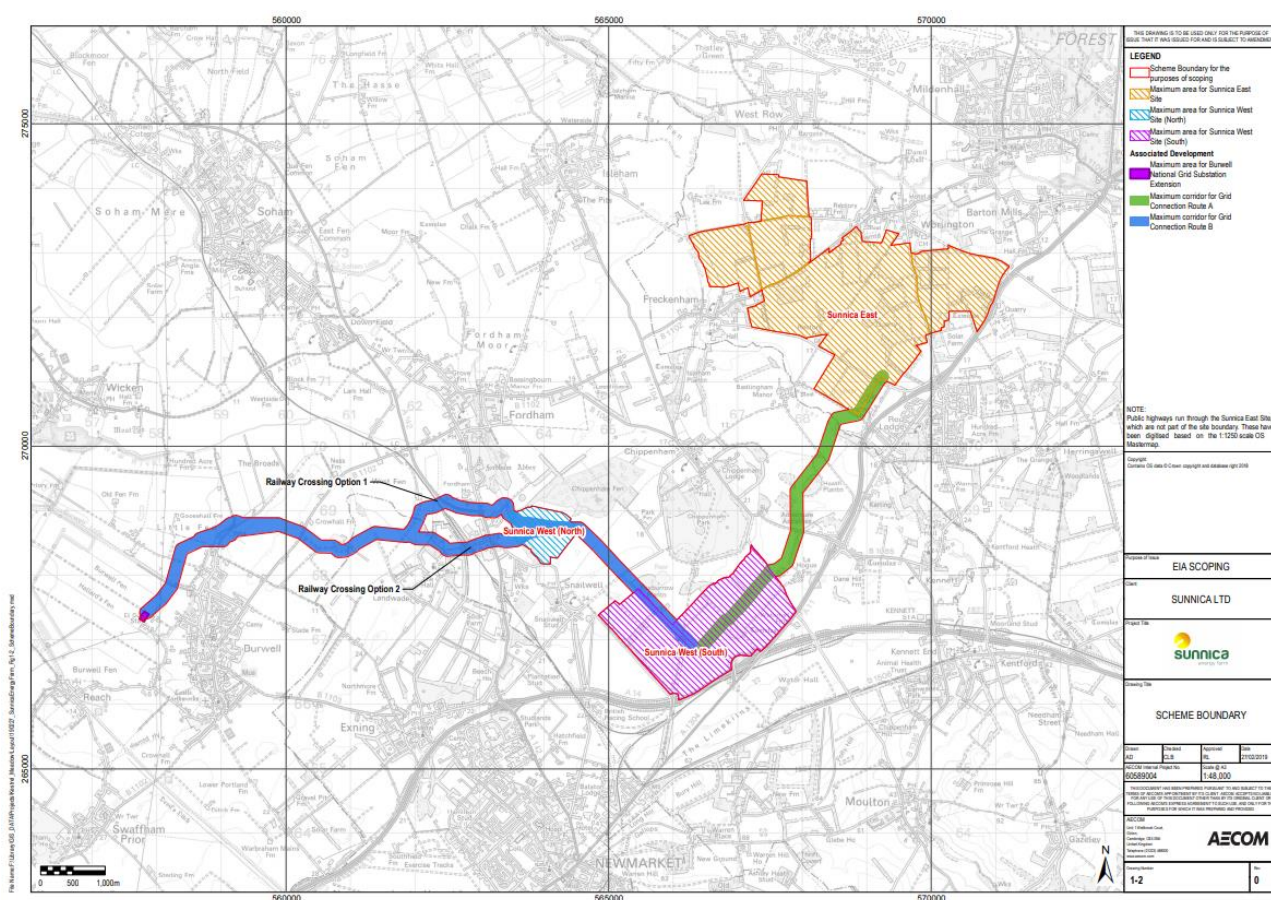


Figure 2-2 The Scheme boundary published as part of the non-statutory consultation

2.4 Non-statutory consultation activity

- 2.4.1 As part of the consultation, the Applicant wrote directly to identified consultees as set out in 2.4.2, held a series of targeted and public consultation events, and made information available publicly in the vicinity of the consultation events and online.
- 2.4.2 The Applicant consulted with:

- a. Host and neighbouring local authorities, encompassing East Cambridgeshire District Council, West Suffolk Council, Cambridgeshire County Council, Suffolk County Council, Norfolk County Council, Essex County Council, Hertfordshire County Council, Northamptonshire County Council, Lincolnshire County Council, Peterborough City Council, Bedford Borough Council, Central Bedfordshire Council, South Cambridgeshire District Council, Huntingdonshire District Council, Fenland District Council, Borough Council of King's Lynn and West Norfolk, Breckland Council, Mid Suffolk District Council, Babergh District Council, and Braintree District Council;
- b. Parish and town councils in the vicinity of the Scheme, encompassing Burwell Parish Council, Exning Parish Council, Fordham Parish Council, Snailwell Parish Council, Chippenham Parish Council, Freckenham Parish Council, Worlington Parish Council, West Row Parish Council, Isleham Parish Council, Newmarket Town Council, and Mildenhall Town Council;
- c. Relevant bodies which would be included as part of a statutory consultation, including the Environment Agency (EA), Highways England, Natural England, and Historic England;
- d. Cambridgeshire and Peterborough Combined Authority;
- e. Lucy Frazer, Member of Parliament for East Cambridgeshire;
- f. Matt Hancock, Member of Parliament for West Suffolk;
- g. Stakeholders including the Gardens Trust, the Wildlife Trust, the Royal Society for the Protection of Birds (RSPB), New Anglia Local Enterprise Partnership (LEP), the Jockey Club and the Newmarket Horsemen's Group;
- h. Potentially affected landholders, identified initially through title information, host and Companies House searches, site investigations and internet-based research; and,
- i. The local community, identified as all residents, businesses, and organisations located in an area within one mile of the Scheme boundary. This included 11,079 addresses and is shown in **Figure 2-3**.

2.4.3 A full list of organisations consulted as part of the non-statutory consultation is included in **Appendix A-2**.

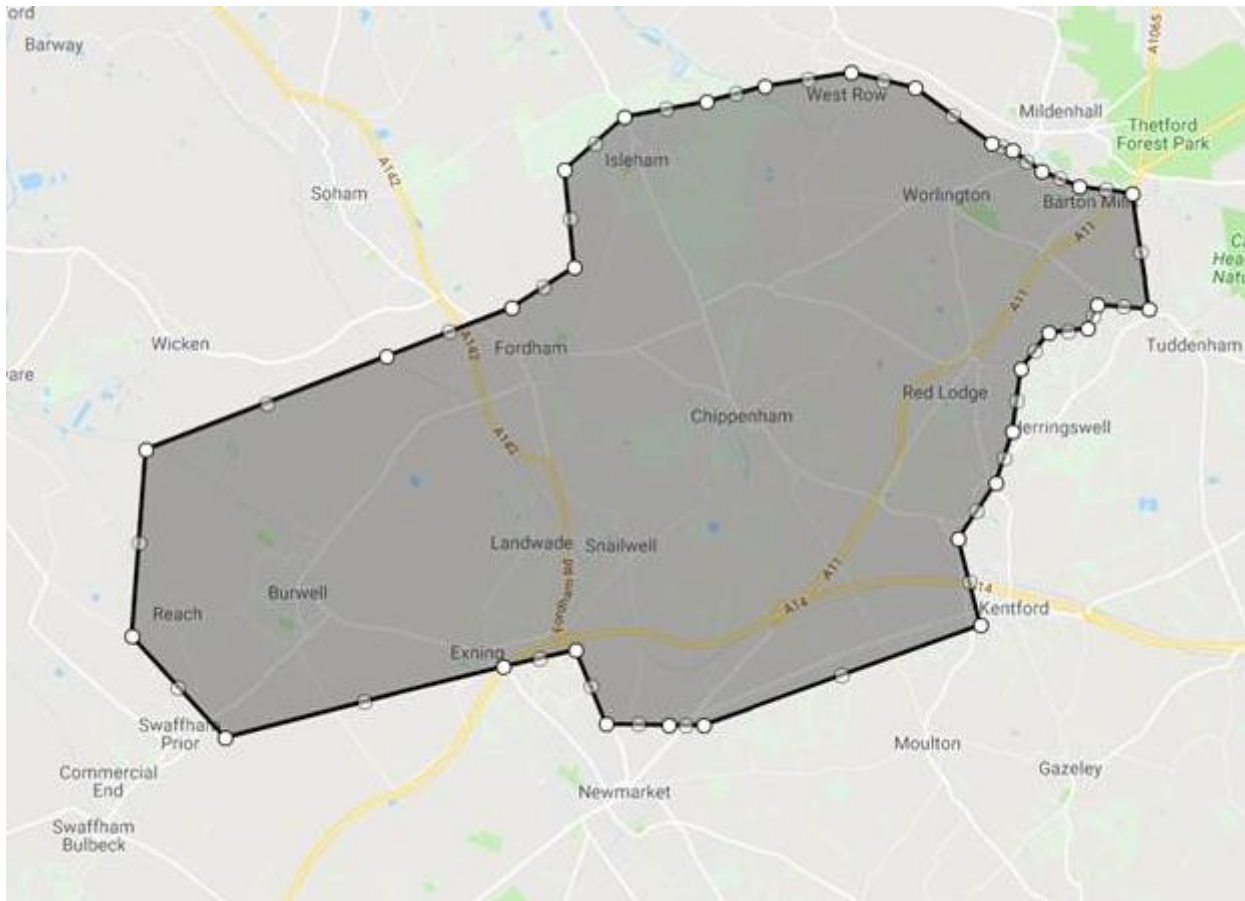


Figure 2-3 Core consultation zone for the purposes of the non-statutory consultation

2.4.4 The Applicant publicised the non-statutory consultation by:

- a. Writing to elected representatives, including parish councillors, district councillors, county councillors, and Members of Parliament within the consultation zone shown in **Figure 2-3** at the start of the consultation period;
- b. Writing to 110 organisations as set out in **Appendix A-2** informing them of the consultation and inviting them to respond at the start of the consultation period;
- c. Writing to 116 people identified as having a potential interest in the land in **Figure 2-2** at the start of the consultation period;
- d. Writing to the 11,079 addresses within the consultation zone included in **Figure 2-3** at the start of the consultation period;
- e. Issuing a press release to media outlets including the Newmarket Journal, the East Anglian Daily Times, the Cambridge News, and Bury Free Press on 6 June 2019;
- f. Placing adverts in the Newmarket Journal, the East Anglian Daily Times, the Cambridge News, and Bury Free Press on 13 June 2019;
- g. Participating in news broadcasts on BBC Radio Suffolk (27 June 2019), BBC Radio Cambridgeshire (1 July 2019) and BBC Look East (2 July 2019); and,
- h. Updating the Scheme website with details of the consultation.

2.4.5 A booklet summarising the Scheme and setting out how to respond to the consultation and a questionnaire for responses was made available online from the Scheme website and at locations in the vicinity of the Scheme. These are shown in **Table 2-2**.

2.4.6 In addition, large-scale copies of plans published as part of the consultation booklet were made available from the Scheme website.

Table 2-2 Public information points – non-statutory consultation

Dates available	Location
17 June 2019 to 28 July 2019	Burwell Library, Village College, Burwell, CB25 0DU
	Mildenhall Library, Chestnut Close, Mildenhall, IP29 7NL
	Newmarket Library, 1a the Guineas, Newmarket, CB8 8EQ

2.4.7 The Applicant held a series of consultation events in the vicinity of the Scheme to provide the community with an opportunity to view plans and ask questions of the project team. Details of these are included in **Table 2-3**.

Table 2-3 Non-statutory consultation events

Date	Location	Event time
Elected member preview 17 June 2019	Riverside House Hotel, 17 Mill St, Mildenhall, Bury Saint Edmunds IP28 7DP	16:00 – 20:00
Land interest preview 20 June 2019	Riverside House Hotel, 17 Mill St, Mildenhall, Bury Saint Edmunds IP28 7DP	16:00 – 20:00
21 June 2019	Worlington Village Hall, The Street, Worlington, Suffolk, IP28 8RU	15:30 – 19:30
22 June 2019	Red Lodge Millennium Centre, Lavender Cl, Bury St. Edmunds, Red Lodge, Bury Saint Edmunds IP28 8TT	12:00 – 16:00
28 June 2019	Chippenham Village Hall, Scotland End, Chippenham, Ely CB7 5PR	15:30 – 19:30
29 June 2019	Freckenham Village Hall, 7 Fordham Rd, Freckenham, Bury Saint Edmunds IP28 8JB	14:00 – 18:00
2 July 2019	Mandeville Hall, Burwell, Cambridge CB25 0AR	15:30 – 19:30
11 July 2019	West Row Village Hall, Chapel Road, West Row, Bury Saint Edmunds IP28 8NY	15:30 – 19:30
17 July 2019	Fordham Victoria Hall, 12-52 Carter St, Fordham, Ely CB7 5NJ	15:30 – 19:30

19 July 2019	The Beeches, 32 Mill St, Isleham, Ely CB7 5RY	15:30 – 19:30
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2.4.8 Respondents to the consultation were invited to complete a consultation questionnaire. This included the following questions:

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

2.4.9 The consultation questionnaire was available online from the Scheme website, at the public information points set out in **Table 2-2**, and at the consultation events set out in **Table 2-3**.

2.4.10 Consultees were able to respond in writing by email or to Freepost reference RTRB-LUUI-AGBY, c/o Newgate Communications, 50 Basinghall Street, London, EC2V 5DE.

2.4.11 Throughout the consultation, the Applicant maintained a number of communications channels for enquiries. These included a Freephone number (0808 168 7925), an email address hosted via the Scheme website and Freepost address (Freepost reference RTRB-LUUI-AGBY, c/o Newgate Communications, 50 Basinghall Street, London, EC2V 5DE).

2.4.12 Copies of materials published as part of the non-statutory consultation are available in **Appendix A-3**.

2.5 Outcome of non-statutory consultation

2.5.1 Following the non-statutory consultation, the Applicant analysed all of the responses received by the deadline of 28 July 2019.

- 2.5.2 Overall, the Applicant received 265 completed questionnaires in response to the non-statutory consultation. This included 66 questionnaires returned at consultation events or by Freepost and 199 questionnaires returned online.
- 2.5.3 The Applicant also received written responses from the following groups and organisations:
- a. Cadent;
 - b. Cambridgeshire County Council;
 - c. Canal and River Trust;
 - d. Chippenham Parish Council;
 - e. East Cambridgeshire District Council;
 - f. Environment Agency;
 - g. Freckenham Parish Council;
 - h. Kennett Garden Village;
 - i. Matt Hancock MP;
 - j. Moulton Parish Council;
 - k. National Grid;
 - l. National Trust;
 - m. Ramblers, Newmarket and District Group;
 - n. RSPB;
 - o. Suffolk Chamber of Commerce;
 - p. Suffolk County Council;
 - q. Suffolk Preservation Society;
 - r. Swaffham Internal Drainage Board; and,
 - s. West Suffolk Council.
- 2.5.4 Copies of responses from these organisations are included in **Appendix A-4**.
- 2.5.5 Two hundred and twenty-eight people (86% of completed questionnaires) responded to question 1A: *What do you think we need to consider in terms of the design of Sunnica East?* Key themes raised included concern about: the scale of Sunnica East (51%), its proximity to housing (12%), its potential impact on wildlife (12%), potential visual impacts (11%), and loss of agricultural land (9%).
- 2.5.6 Two hundred and six people (77%) responded to question 1B: *What do you think we need to consider in terms of the design of Sunnica West?* Key themes raised included concern about: the scale of Sunnica West (37%), potential visual impacts (9%), its proximity to housing (9%), its potential impact on wildlife (9%), and loss of agricultural land (7%).
- 2.5.7 One hundred and eighty-nine people (71%) responded to question 1C: *What do you think we need to consider in terms of the design of our cable routes?* Key themes raised included concern about: the scale of the cable route (7%), potential impacts on wildlife (6%) and the environment in general (6%), disruption on local roads during construction (6%), and a preference for the cable to be underground (5%).

- 2.5.8 Two hundred and thirty-one people (87%) responded to question 1D: *What do you think we need to consider in terms of environmental impacts?* Key themes raised included concern about: potential impacts on wildlife (35%), loss of agricultural land (11%), negative environmental impacts in general (10%), visual impacts from large solar panels (8%), and the disposal of materials from the Scheme after decommissioning (6%).
- 2.5.9 Two hundred and twenty-three people (84%) responded to question 2: *We are currently proposing that the cables associated with Sunnica Energy Farm should be underground. Do you have any comments on this and the route we are currently proposing?* Key themes raised included: agreement that cables should be underground (20%), general opposition to the Scheme (10%), concern about impacts from the cable route on traffic (9%), general concern about environmental impacts (6%), and concern about impacts on wildlife (5%).
- 2.5.10 Two hundred and twenty-six people (85%) responded to question 3: *We are considering whether the battery storage element of the scheme should be spread around Sunnica East and Sunnica West or concentrated at particular locations. Do you have any comments on this?* Key themes raised included: concern about noise from the batteries (12%), a view that the battery storage element of the Scheme should be concentrated at a specific location (11%), a view that the battery storage element should be located as far away from residents as possible (11%), concern about negative visual impact (8%), and general opposition to the Scheme (7%).
- 2.5.11 Two hundred and twenty people (83%) responded to question 4: *Do you have any information relevant to the scheme and/or local environment which you think we should take into account?* Key themes raised included concern about: potential impacts on wildlife (17%), the scale of the Scheme (11%), loss of agricultural land (7%), general opposition to the Scheme (6%), and loss of Public Rights of Way (6%).
- 2.5.12 Two hundred and seventeen people (82%) responded to question 5: *Are there any specific enhancements locally you feel could be included as part of the scheme?* Key themes raised included: a view that the size of the Scheme should be reduced (14%), general opposition to the Scheme (13%), a desire for appropriate visual screening (11%), a desire to enhance and retain Public Rights of Way (5%), and a view that the Scheme should be located elsewhere (4%).
- 2.5.13 Two hundred and fourteen people (81%) responded to question 6: *Is there anything you would like to know more about at the next round of events?* Responses to this question were general in nature and often reiterated views expressed in other question responses.
- 2.5.14 Two hundred and twenty-nine people (86%) responded to question 7: *Do you have any further comments?* Key themes raised included: concern about the scale of the Scheme (20%), general opposition to the Scheme (14%), concern about loss of agricultural land (8%), a view that the Scheme should be located elsewhere (5%), and concern about the impact of the Scheme on house prices in its vicinity (5%).
- 2.5.15 **Table 2-4** below sets out how the Applicant has had regard to key topics raised through responses to the non-statutory consultation. This includes responses submitted as completed questionnaires and those submitted by organisations as included in **Appendix A-4**.

- 2.5.16 Comments from the non-statutory consultation influenced the ongoing evolution of the Scheme design. The iterative process of designing the Scheme, including the way that consultation feedback and EIA informed design, is set out in detail in the Design and Access Statement [EN010106/APP/7.3].
- 2.5.17 Changes made to the design of the Scheme as a result of the non-statutory consultation included reducing the proportion of land within the Scheme boundary proposed for solar energy generation or battery storage by 26%. This land was subsequently proposed to be used for landscaping, ecological or archaeological mitigation purposes.
- 2.5.18 Following feedback from the non-statutory consultation, the areas proposed for development were set further back from nearby villages. One of the sites that we presented at the non-statutory consultation – Sunnica East – was split into two smaller sites: Sunnica East Site A and Sunnica East Site B. These changes were intended to reduce impacts on communities and the landscape.
- 2.5.19 Following the non-statutory consultation, we were also able to confirm the route proposed for the cable connecting the Sunnica East Sites A and B and Sunnica West Sites A and B to the grid connection point at the Burwell National Grid Substation. As a result of further discussions with National Grid about the upgrade to the Burwell substation, it was confirmed a small extension to that substation was required and we established three areas as potential options for that extension for further consultation.
- 2.5.20 The non-statutory consultation also informed subsequent consultation activity. The ways in which the non-statutory consultation influenced our approach to subsequent consultation include:
- Ensuring community consultation activity included Snailwell and Kennett through direct engagement with their parish councils and writing to residents in each community. This was in response to both feedback received and design changes that moved Sunnica West Site A closer to Kennett;
 - Including targeted advertising through the local press including adverts in the Ely Standard and East Anglian Daily Times in response to readership identified in the vicinity of the scheme sites;
 - Engaging with parish and town councils in the vicinity of the proposed Sunnica Energy Farm between periods of consultation to further build upon engagement prior to, and during the non-statutory consultation; and,
 - Identifying additional groups that have a particular interest in public rights of way such as The Ramblers and bridleways groups as relevant consultees. Representatives of public rights of way groups took part in the non-statutory consultation.

Table 2-4 Key topics raised by consultees during the non-statutory consultation and the Applicant's response

Topic raised	Regard had by the Applicant
Design	
Further information required on the specification and location of specific elements of the Scheme including photovoltaic (PV) panels, BESS, inverters, and cables.	Non-statutory consultation took place at an early stage in the Scheme development. This was to allow consultee feedback to be considered in developing the initial design proposals for the Scheme. Further detail on specific Scheme elements was presented as part of the next stage of consultation.
Design needs to be provided for key areas and is likely to require an external design review panel of landscape architects.	Following the non-statutory consultation, The Applicant engaged extensively with local authority representatives in developing the design of the Scheme, as set out in Table 2-5 . More detailed designs, including the proposed locations of specific elements of the Scheme and embedded mitigation measures, were presented as part of the statutory consultation.
Conflict with the Bay Farm anaerobic digester site needs to be considered.	The Bay Farm anaerobic digester was considered within the assessments set out in the Preliminary Environmental Information (PEI) Report.
Consultation	
Not enough time or information has been provided to allow interested parties to consider this proposal.	<p>The Applicant considers that the six weeks provided for responses to the non-statutory consultation was appropriate to the Scheme, given its scope and level of information presented.</p> <p>The Applicant considered this feedback in planning the statutory consultation, including a period of 10 weeks for responses in the SoCC.</p>
The Applicant did not issue updated Scheme plans following the withdrawal of one of the landowners.	Following the non-statutory consultation, the Applicant had regard to all responses received and further refined its Scheme. Updated Scheme plans were published as part of the statutory consultation, as set out in Chapter 4 of this report.
Requests for further engagement with parish councils in the vicinity of the Scheme.	The Applicant sought further engagement with parish councils in the vicinity of the Scheme prior to the statutory consultation. This is detailed in Table 2-5 .
Site selection and location	
The scale of development is inappropriate to the local context.	There is a direct correlation between the amount of land required and the level of energy we are able to produce. This in turn has an impact on the contribution that the

Topic raised	Regard had by the Applicant
	<p>Scheme can make to the country's energy needs. Improvements in technology have made PV panels and the other elements of solar farms more affordable. However, the costs involved remain significant and the Scheme needs to be built at a certain scale for the Scheme to be viable.</p> <p>In particular, the Scheme needs to meet the cost of connecting to the national electricity transmission system. This was originally built to serve a different pattern of generation and consumption and needs updating to meet the challenges facing the country now. In this case, we need to install a supergrid transformer at Burwell National Grid Substation. Further detail on the need for the Scheme is presented in the Statement of Need [EN010106/APP/7.1].</p> <p>The local context for the Scheme was considered in developing the proposed design. Information on how the Applicant's assessment of the local context informed the design of the Scheme is presented in the Design and Access Statement [EN010106/APP/7.3]</p>
<p>The exact location and size of the Scheme is not clear.</p>	<p>As part of the non-statutory consultation, the Applicant published an outline Scheme boundary as shown in Figure 2-2. This showed the boundary of the area being considered for development at the time of the non-statutory consultation.</p> <p>Non-statutory consultation took place at an early stage in the Scheme development. This was to allow consultee feedback to be considered in developing the initial design proposals for the Scheme. Updated information on the size and location of specific elements of the Scheme was published as part of the statutory consultation.</p>
<p>Objections to using viable agricultural land rather than brownfield sites/land along road junctions instead. The Applicant should demonstrate that it has considered alternative sites.</p>	<p>Details of the Applicant's approach to site selection and alternatives analysis were published in Chapter 4 of the PEI Report as part of the statutory consultation. The Applicant also published its assessment of agricultural land classification at the Scheme in Sections 12.6.10 to 12.6.13 and Table 12-11 of Chapter 12 (Socio-Economics and Land Use) of the PEI Report.</p>
<p>Sunnica East and the associated electricity transmission cable falls within a Minerals Consultation Area and includes in its entirety Bay Farm Quarry, Worlington, which is an operational sand</p>	<p>This was noted and considered in the location of specific elements of Sunnica East. Further information on potential impacts on minerals extraction was presented at the next stage of consultation in Chapter 12 (Socio-Economics and Land Use) of the PEI Report. The Planning Statement [EN010106/APP/7.2] addresses allocations and associated policies in the Cambridgeshire and Suffolk Minerals and</p>

Topic raised	Regard had by the Applicant
and gravel quarry and inert waste landfill site. There is also a concrete batching plant and inert waste recycling facility on that site.	Waste plans.
EIA – ecology	
It is not possible to make a comment on ecology until all biodiversity surveys have been completed. The results of these surveys will need to be provided alongside mitigation measures.	The outcome of biodiversity surveys was presented in Chapter 8 of the PEI Report, published as part of the statutory consultation. An updated assessment alongside details of proposed mitigation measures is included in Chapter 8 of the Environmental Statement [EN010106/APP/6.1]
The Site of Special Scientific Interest (SSSI) of Chippenham and Snailwell Fen is the most important ecological feature in the area – several county wildlife sites are located close to the site and would need to be considered. The size of the site means that impacts are likely to be far wider than this.	This was noted and an assessment of potential impacts on the Chippenham Fen and Snailwell SSSI was presented in Chapter 8 of the PEI Report, published as part of the statutory consultation. An updated assessment is included in Chapter 8 of the Environmental Statement [EN010106/APP/6.1] and Appendix 8M of the Environmental Statement, the European site appropriate assessment report (Habitats Regulation Assessment) [EN010106/APP/6.2]
There is a lack of clear understanding on how the development will impact wildlife and allow for healthy ground conditions.	Non-statutory consultation on the Scheme took place before wildlife surveys were complete. An initial assessment of potential impacts on wildlife was presented in Chapter 8 of the PEI Report, published as part of the statutory consultation. An updated assessment is included in Chapter 8 of the Environmental Statement [EN010106/APP/6.1]
There should be a site-specific plan for managing biodiversity. To inform this, a full suite of surveys for wildlife and habitats must take place. Ecological design should be informed by the mitigation hierarchy and be guided by the site's location, in Suffolk, on the edge of the Brecks.	Details of ecological mitigation and management during construction and operations were presented in the Outline Landscape and Environment Management Plan (OLEMP) as Appendix 10I of the PEI Report and Framework Construction Environment Management Plan (CEMP) as Appendix 16C of the PEI Report. These were both published as part of the statutory consultation. An updated OLEMP is Appendix 10I of the Environmental Statement [EN010106/APP/6.2] and the DCO application also includes an updated Framework CEMP as Appendix 16 C of the Environmental Statement [EN010106/APP/6.2]. Requirements in the draft DCO [EN010106/APP/3.1] secure the approval and implementation of the Landscape

Topic raised	Regard had by the Applicant
	<p>and Environmental Management Plan and the CEMP.</p> <p>Details of assessments for wildlife and habitats carried out by the Applicant were presented in Chapter 8 of the PEI Report, published as part of the statutory consultation, along with proposals for embedded mitigation and biodiversity enhancement. An updated assessment is included in Chapter 8 of the Environmental Statement [EN010106/APP/6.1]</p>
<p>Ecological monitoring must take place throughout construction and operation, and this must inform a site management plan and a dedicated management team. These should be prepared even at the pre-DCO stage so that fears regarding negative impacts can be resolved and a clear path to biodiversity net gain can be mapped.</p>	<p>Details of ecological mitigation and management during construction and operations were presented in the Outline Landscape and Environment Management Plan (OLEMP) as Appendix 10L of the PEI Report and Framework Construction Environment Management Plan (CEMP) as Appendix 16C of the PEI Report. These were both published as part of the statutory consultation. An updated OLEMP is Appendix 10I of the Environmental Statement [EN010106/APP/6.2] and the DCO application also includes an updated Framework CEMP as Appendix 16C of the Environmental Statement [EN010106/APP/6.2]. Requirements in the draft DCO [EN010106/APP/3.1] secure the approval and implementation of the LEMP and the CEMP.</p>
<p>All wildlife and habitat surveys should meet the appropriate guidelines and guidance, especially those produced by the Chartered Institute of Ecology and Environmental Management (CIEEM) and Natural England. All data should be shared with the relevant Biological Records Centres, which for Suffolk is the Suffolk Biodiversity Service.</p>	<p>All wildlife and habitat surveys met appropriate guidelines and guidance and details were published as part of Chapter 8 of the PEI Report. Data has been shared as appropriate with the Suffolk Biodiversity Service.</p>
<p>Effects of development must result in a net gain for biodiversity and mitigation must be prioritised for ecologically sensitive areas.</p>	<p>The Applicant's approach to achieving biodiversity net gain was presented in Chapter 8 of the PEI Report, published as part of the statutory consultation, alongside details of embedded mitigation measures. Updated details of the Applicant's approach to achieving biodiversity net gain and proposed mitigation measures are included in Chapter 8 of the Environmental Statement [EN010106/APP/6.1]</p>
<p>Sunnica East is likely to severely impact upon breeding stone curlews. It is strongly advised that</p>	<p>The Applicant has undertaken breeding bird surveys. Initial results were presented in Chapter 8 of the PEI Report, published as part of the statutory consultation. An updated assessment is included in Chapter 8 of the Environmental</p>

Topic raised	Regard had by the Applicant
breeding bird surveys are undertaken.	Statement [EN010106/APP/6.1]
Surveys must be undertaken to understand the importance of the proposed area for species such as golden plover and hen harrier throughout the non-breeding period.	The Applicant has undertaken surveys for relevant birds in the non-breeding period. Initial results were presented in Chapter 8 of the PEI Report, published as part of the statutory consultation. An updated assessment is included in Chapter 8 of the Environmental Statement [EN010106/APP/6.1]
Consideration should also be given to the potential presence of designated feature species of the Ouse Washes Special Protection Area (SPA), particularly wintering Bewick's and Whooper Swans and night-time surveys.	Details of assessments for wildlife and habitats carried out by the Applicant were presented in Chapter 8 of the PEI Report, published as part of the statutory consultation, along with proposals for embedded mitigation and biodiversity enhancement. An updated assessment is included in Chapter 8 of the Environmental Statement [EN010106/APP/6.1]
The EIA must fully address the issue of potential birdstrike and glint/glare on species that may mistake solar fields as waterbodies.	Details of assessment for glint and glare carried out by the Applicant were presented in Chapter 16, section 16.3, of the PEI Report, published as part of the statutory consultation. An updated assessment is included in Chapter 8 of the Environmental Statement [EN010106/APP/6.1] The potential for birdstrike was addressed in Chapter 16, section 16.5 of the PEI Report, published as part of the statutory consultation. An updated assessment is included in Chapter 16 of the Environmental Statement [EN010106/APP/6.1]
The EIA and associated Environmental Statement (ES) should be based upon an initial Phase 1 Habitat Survey, and provide an indication of how much of each habitat type will be removed (i.e. break down the land take by habitat type); together with mitigation measures to avoid loss, provide replacement and/or enhance remaining habitat.	This is included in Chapter 8 of the Environmental Statement [EN010106/APP/6.1]
Given that Sunnica West is close to the Fenland/Chippenham Fen Special Area of Conservation	A Habitats Regulations Screening Report was included as Appendix 8L of the PEI Report, published as part of the statutory consultation. This is also addressed in the European site appropriate assessment report (Habitats

Topic raised	Regard had by the Applicant
(SAC), it is essential that a Habitats Regulations Assessment is carried out.	Regulation Assessment) [EN010106/APP/6.2]
Consideration should be given to the potential impact of habitat change due to shadowing out of ground surfaces by panels and the use of herbicides to restrict plant growth near panels.	This is considered in Chapter 8 of the PEI Report, published as part of the statutory consultation, along with proposals for embedded mitigation and biodiversity enhancement. An updated assessment is included in Chapter 8 of the Environmental Statement [EN010106/APP/6.1]
Consideration should be given to altering the availability of sunlight and rainfall beneath and adjacent to the panels may cause changes in biodiversity – particularly in areas of natural or semi-natural vegetation. Mitigation measures could consider the use of low light and low water tolerant grassland seed mixes.	This is considered in Chapter 8 of the PEI Report, published as part of the statutory consultation, along with proposals for embedded mitigation and biodiversity enhancement. An updated assessment is included in Chapter 8 of the Environmental Statement [EN010106/APP/6.1]
The project should consider how to avoid damage or loss of natural/ semi-natural habitat. Ideally this should involve restoring links and wildlife corridors through the landscape, particularly those that interlink statutory wildlife sites.	This is considered in Chapter 8 of the PEI Report, published as part of the statutory consultation, along with proposals for embedded mitigation and biodiversity enhancement. The mitigation measures proposed include a series of wildlife corridors through the Scheme. An updated assessment is included in Chapter 8 of the Environmental Statement [EN010106/APP/6.1]
Site security fencing has the potential to disrupt landscape connectivity for wildlife particularly to/ from protected sites. Consideration should be given to mitigation measures which enable the movement of wildlife through the sites. Excavation of cable routes should also avoid blocking, damaging or disconnecting wildlife corridors through the landscape.	This is considered in Chapter 8 of the PEI Report, published as part of the statutory consultation, along with proposals for embedded mitigation and biodiversity enhancement. An updated assessment is included in Chapter 8 of the Environmental Statement [EN010106/APP/6.1]. In addition, details of ecological mitigation and management during construction and operations were presented in the Outline Landscape and Environment Management Plan (OLEMP) as Appendix 10L of the PEI Report and Framework Construction Environment Management Plan (CEMP) as Appendix 16C of the PEI Report. These were both published as part of the statutory consultation. An updated OLEMP is included as Appendix 10I of the Environmental Statement

Topic raised	Regard had by the Applicant
	[EN010106/APP/6.2] and the DCO application also includes an updated Framework CEMP as Appendix 16C of the Environmental Statement [EN010106/APP/6.2]. Requirements in the draft DCO [EN010106/APP/3.1] secure the approval and implementation of the LEMP and the CEMP.
If there is a likelihood of importing topsoil onto the site, particularly near to designated wildlife sites, then the EIA should consider the risk of releasing invasive species, together with appropriate mitigation measures.	This is considered in Chapter 8 of the PEI Report, published as part of the statutory consultation. An updated assessment and details of proposed mitigation are included in Chapter 8 of the Environmental Statement [EN010106/APP/6.1]
Changes to hydrology due to solar farm infrastructure installation, including cabling works, need careful consideration as this could impact on fenland and other habitat.	This is considered in Chapter 8 of the PEI Report, published as part of the consultation. An updated assessment is included in Chapter 8 of the Environmental Statement [EN010106/APP/6.1]
EIA – water resources	
The Drainage Strategy must follow national guidance (Non-Statutory Technical Standards for Sustainable Urban Drainage Systems (SuDS)) and local policy. The drainage strategy should utilise infiltration type drainage pending preliminary site investigations and ground-intrusive investigations.	Details of the compliance of the Drainage Strategy with national guidance and local policy was included in Chapter 9 of the PEI Report, published as part of the statutory consultation. An updated assessment and details of proposed mitigation is included in Chapter 9 of the Environmental Statement [EN010106/APP/6.1] and in the Flood Risk Assessment [EN010106/APP/6.2].
The Flood Risk Assessment and Drainage Strategy (FRA/DS) should assess all areas of hardstanding and all building types of the development i.e. substations and battery compound and	This matter was addressed in the assessment set out in Chapter 9 of the PEI Report, published as part of the statutory consultation. An updated assessment is included in Chapter 9 of the Environmental Statement [EN010106/APP/6.1] and in the Flood Risk Assessment [EN010106/APP/6.2].

Topic raised	Regard had by the Applicant
not just the main solar farm itself. BRE 365 infiltration testing has been referenced in the scoping report and data gathered from these tests should form the basis of the FRA/DS.	
EIA should distinguish between main phases of the development lifecycle (construction, operation, decommissioning) and its impact on the water environment (hydrology and hydrogeology).	The Applicant included each of these phases in the assessment set out in Chapter 9 of the PEI Report, published as part of the statutory consultation, as well as Chapter 9 of the Environmental Statement [EN010106/APP/6.1]
A construction surface water management plan or similar should be submitted in support of the EIA to outline procedures that will be in place to reduce impacts of the construction phase.	The Applicant prepared a Framework Construction Environmental Management Plan (CEMP) addressing this topic, which was included as Appendix 13C of the PEI Report. This included construction surface water management. A full draft CEMP is included in the DCO application as Appendix 16C of the Environmental Statement [EN010106/APP/6.2].
Assessment of impacts on water resources should specifically include a FRA/DS which should be submitted as part of the EIA.	A draft Flood Risk Assessment was presented as Appendix 9A of the PEI Report, published as part of the statutory consultation. An updated assessment and Drainage Strategy are included in Chapter 9 of the Environmental Statement [EN010106/APP/6.1] and in the Flood Risk Assessment [EN010106/APP/6.2].
The Environment Agency operates a groundwater support scheme (GWSS) in the area proposed for the new solar farm. The GWSS is used to support flows in tributaries of the River Granta and the Lodes at times of low flow. It consists of a network of 6 boreholes and associated pipelines and outfalls. From the map of the proposed development site, it appears that pipelines associated with Lodes-Granta GWSS run beneath the sites proposed for the new solar farm.	This is noted and reflected in the assessments presented in Chapter 9 of the PEI Report, published as part of the statutory consultation, as well as Chapter 9 of the Environmental Statement [EN010106/APP/6.1]

Topic raised	Regard had by the Applicant
EIA – landscape and visual impact	
<p>If a landscaping scheme is proposed as part of the proposal, only slow and low growing species of trees and shrubs should be planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.</p>	<p>This is noted and will be considered in the detailed design of the Scheme. Details of proposed landscaping are set out in the OLEMP included as Appendix 10I of the Environmental Statement [EN010106/APP/6.2]. A requirement to the draft DCO [EN010106/APP/3.1] secures the approval and implementation of the Landscape and Environmental Management Plan.</p>
<p>The pylons and substations at Burwell substation already have a significant visual impact on Wicken Fen and the surrounding area and we would be concerned about any new infrastructure which increases this.</p>	<p>No additional overhead lines are proposed as part of the Scheme. The options for the extension to Burwell substation has been assessed in the Environmental Statement [EN010106/APP/6.1] submitted as part of the DCO application.</p>
<p>Concerns about the proximity of the Scheme to Worlington and Freckenham, together with the loss of view and local amenities for villagers.</p>	<p>Following the non-statutory consultation, the Applicant conducted a landscape and visual impact assessment (LVIA). This had the aim of minimising the effects of the Scheme through design principles which have been embedded into the Scheme. The embedded mitigation covers the siting, scale, and mass of structures, as well as proposed Green Infrastructure (mitigation planting) to improve the landcover and vegetation patterns, as well as reducing the visibility of the Scheme, as described in Chapter 3 of the PEI Report and shown on the Parameter Plans published as part of the statutory consultation. An OLEMP was also drafted and included within the consultation materials (Appendix 10I of the PEI Report) to demonstrate how the proposed mitigation measures will be delivered. These measures reduce the significance of effect of the Scheme from many viewpoints and locations, including Worlington and Freckenham. An updated OLEMP is included as Appendix 10I of the Environmental Statement [EN010106/APP/6.2]. A requirement in the draft DCO [EN010106/APP/3.1] secures the approval and implementation of the Landscape and Environmental Management Plan.</p>
<p>Further surveys will need to be undertaken to understand the impact upon the proposed garden village extension to Kennett. Further</p>	<p>The LVIA assessed the potential visual effects to different types of visual receptor, including residential receptors, i.e. residential views, and agreed representative viewpoints via discussions with local authority landscape officers. This included viewpoints at the locations identified in the</p>

Topic raised	Regard had by the Applicant
viewpoints should be explored from Junction 38 of the A14/11 and from Little Fen Drive, Burwell, to the southern extension of the substation.	comment, as set out in Figure 10-12 of the PEI Report, published as part of the statutory consultation. Updated viewpoints are presented in Chapter 10 of the Environmental Statement [EN010106/APP6.1].
Additional viewpoints will need to be taken from halfway down Chippenham Hall Avenue. Damage to the historic setting of the Avenue is expected to be the most significant harm from these proposals. The impact on High Lodge at the end of the registered park and garden will also need to be considered. The Scheduled Ancient Monument of a Roman Villa on Snailwell Road will also need to be considered.	The LVIA assessed the potential visual effects to different types of visual receptor, including residential receptors, i.e. residential views, and agreed representative viewpoints via discussions with local authority landscape officers. This included viewpoints at the locations identified in the comment, as set out in Figure 10-12 of the PEI Report, published as part of the statutory consultation. Updated viewpoints are presented in Chapter 10 of the Environmental Statement [EN010106/APP/6.1]. Impacts to the heritage assets referenced are considered in Chapter 7 of the Environmental Statement [EN010106/APP/6.1].
Along with the CEMP, a long-term Landscape and Environment Management Plan should be provided in the outline DCO submission, which will show who will be undertaking the site's management and how they will be informed by and react to the essential and on-going monitoring. This will be informed by the mitigation hierarchy and include realistic proposals for Biodiversity Net Gain.	An OLEMP was included as Appendix 10L of the PEI Report, published as part of the statutory consultation. An updated OLEMP is included as Appendix 10I of the Environmental Statement [EN010106/APP/6.1]. A requirement to the draft DCO [EN010106/APP/3.1] secures the approval and implementation of the Landscape and Environmental Management Plan.
There needs to be consideration of the cumulative effect within the Sunnica East site, as it is equivalent to multiple traditional solar plants. Local parish level landscape character assessments should be carried out, assessing the value,	This matter was considered in Chapter 10 of the PEI Report, published as part of the consultation. An updated assessment is included in Chapter 10 of the Environmental Statement [EN010106/APP/6.1] In-combination effects are considered in Chapter 17 of the Environmental Statement [EN010106/APP/6.1]

Topic raised	Regard had by the Applicant
sensitivity, and expected change of the landscape for each of the three villages and the connecting routes between them, key views need to be identified, and measures taken within the design to protect and retain these.	
Design of site must support West Suffolk Council's natural greenspace study for the former Forest Heath area.	This matter was considered in Chapter 10 of the PEI Report, published as part of the consultation. An updated assessment is included in Chapter 10 of the Environmental Statement [EN010106/APP/6.1]
An accurate understanding of the local landscape character, the local landscape sensitivity, and key views from and to the villages will be essential. Based on this, it will be possible to discern areas within the red line that will be more suitable for solar panels/battery stations, etc. and areas that are more sensitive to change and that will need to be protected.	This matter was considered in Chapter 10 of the PEI Report, published as part of the consultation. An updated assessment is included in Chapter 10 of the Environmental Statement [EN010106/APP/6.1]. The LVIA included in these documents informed the proposed location of different elements of the Scheme. The iterative process of designing the Scheme, including the way that EIA informed design, is set out in the Design and Access Statement [EN010106/APP/7.3].
Due to the scale of the proposal, and the fact that the connecting roads between the three villages traverse the proposal site, internal viewpoints will be critical to comprehend the magnitude of the change that is to be expected. Winter viewpoints will be essential for full assessment.	The LVIA assessed the potential visual effects to different types of visual receptor, including residential receptors, i.e. private views, and agreed representative viewpoints via discussions with local authority landscape officers. This included viewpoints at the locations identified in the comment, as set out in Figure 10-12 of the PEI Report, published as part of the statutory consultation. Updated viewpoints are presented in Chapter 10 of the Environmental Statement [EN010106/APP/6.1].
The proposed installation would fundamentally alter the landscape character spanning and encroaching upon a number of rural settlements. Important landscape features including	Following the non-statutory consultation, the Applicant conducted a landscape and visual impact assessment (LVIA). This had the aim of minimising the effects of the Scheme through design principles which have been embedded into the Scheme. The embedded mitigation covers the siting, scale, and mass of structures, as well as proposed Green Infrastructure (mitigation planting) to

Topic raised	Regard had by the Applicant
tree belts, hedgerows, and footpaths must be protected and mitigation of visual impacts embedded within the Scheme.	improve the landcover and vegetation patterns, as well as reducing the visibility of the Scheme, as described in Chapter 3 of the PEI Report and shown on the Parameter Plans, published as part of the statutory consultation. An OLEMP was also drafted and included within the consultation materials (Appendix 10I of the PEI Report) to demonstrate how the proposed mitigation measures will be delivered. This embedded mitigation includes retention of trees and hedgerows. An updated OLEMP is included as Appendix 10I of the Environmental Statement [EN010106/APP/6.2]. A requirement to the draft DCO [EN010106/APP/ 3.1] secures the approval and implementation of the Landscape and Environmental Management Plan.
Views of PV panels from villages must be avoided.	This matter was considered in Chapter 10 of the PEI Report, published as part of the statutory consultation. An updated assessment is included in Chapter 10 of the Environmental Statement [EN010106/APP/6.1]. The LVIA included in these documents informed the proposed location of different elements of the Scheme.
Design and layout must be sensitive to place – not just to Suffolk landscape character types but also the villages.	The iterative process of designing the Scheme, including the way that LVIA has informed design, is set out in the Design and Access Statement. [EN010106/APP/7.3].
EIA – archaeology	
There are records of archaeological finds in the proposed area, but the majority of the area has never been surveyed. The scale of development has potential to destroy the heritage of the site.	This matter was considered in Chapter 7 of the PEI Report, published as part of the consultation. An updated assessment is included in Chapter 7 of the Environmental Statement [EN010106/APP/6.1]
Employment and skills	
Removal of land will affect local employment. This needs to be fully assessed.	This matter was considered in Chapter 12 of the PEI Report, published as part of the consultation. An updated assessment is included in Chapter 12 of the Environmental Statement [EN010106/APP/6.1]
Consideration should be given to whether Sunnica East would prejudice the Council's plans for employment growth along	Potential socio-economic impacts, including on employment land, are considered in Chapter 12 of the PEI Report, published as part of the consultation. An updated assessment is included in Chapter 12 of the Environmental

Topic raised	Regard had by the Applicant
the A11 corridor.	Statement [EN010106/APP/6.1]
Further information should be presented on the economic benefits of the project, how it will employ and use local skilled and unskilled workers and how the project will work with local businesses/suppliers.	The Applicant has engaged with local and regional education and skills providers and economic development bodies to understand how the potential economic benefits of the project can be realised. This has informed a Skills and Employment Management Plan (to be secured by a requirement to the DCO).
Transport and access	
Further information required on traffic impacts of development.	Further information on potential traffic impacts was presented in Chapter 13 of the PEI Report, published as part of the statutory consultation. An updated assessment of potential traffic impacts is included in Chapter 13 of the Environmental Statement [EN010106/APP/6.1]
Concern about large vehicles accessing the site from A14.	Details of proposed access arrangements during construction were presented in the draft Construction Traffic Management Plan included in Appendix 13B of the PEI Report, published as part of the statutory consultation. The DCO application includes a Framework Construction Environmental Management Plan (CEMP) and Framework Construction Traffic Management Plan as Appendix 13C of the ES [EN010106/APP/6.2]. Requirements included in the draft DCO [EN010106/APP/3.1] secure the approval and implementation of both the CEMP and a Construction Traffic Management Plan.
Further information required on cumulative traffic impacts taken alongside potential closure of RAF Mildenhall and proposed housing development.	Further information on cumulative traffic impacts was presented in Chapter 13 of the PEI Report, published as part of the statutory consultation. An updated assessment of potential traffic impacts is included in Chapter 13 of the Environmental Statement [EN010106/APP/6.1]
Further information required on impact on Cambridge and Peterborough transit network.	Further information on interactions with the wider transport network was presented in Chapter 13 of the PEI Report, published as part of the statutory consultation. An updated assessment of potential traffic impacts is included in Chapter 13 of the Environmental Statement [EN010106/APP/6.1]
Special treatment will be required for Snailwell bridleway. Long term closures will not be welcome.	Details of how local public rights of way, including the bridleway referenced, will be impacted during the construction phase were provided in the PEI Report, published as part of the statutory consultation under Chapter 12 (Socio-Economics and Land Use) and Chapter 13 (Transport and Access), as well as each chapter's

Topic raised	Regard had by the Applicant
	<p>supporting figures and appendices, including a Transport Assessment at Appendix 13A. Figures 12-3 and 13-1 of the PEI Report show the existing public rights of way; Figures 12-4 and 13-2 showed which public rights of way would be temporarily closed during construction; and Figures 12-5 and 13-3 showed the public rights of way and permissive paths post construction. Updated versions of these figures are included as part of the Environmental Statement [EN010106/APP/6.3] in the DCO application.</p> <p>While some public rights of way would be closed during construction, the Applicant would put in place appropriate measures to mitigate any closures and to ensure they are closed for as short a period as possible. Construction would be phased so closures of public rights of way would not take place for the whole of the period we are building the Scheme, or simultaneously. Mitigation for the temporary disruption to footpaths during construction includes having appropriately and clearly signed alternative routes and, where possible, the temporary closures will be planned and programmed to minimise disruption to users. The DCO application includes a Transport Assessment as Appendix 13B of the ES [EN010106/APP/6.2] and a Framework Construction Environmental Management Plan (CEMP) as Appendix 13C [EN010106/APP/6.2] providing details of mitigation during the construction period. Requirements to the draft DCO [EN010106/APP/3.1] secure the approval and implementation of both the CEMP and a Construction Traffic Management Plan.</p>
<p>The 'green lane', 6006 in Suffolk County Council records running from Rectory Farm to Worlington will also require special treatment.</p>	<p>Details of how local public rights of way, including the public right of way referenced, will be impacted during the construction phase were provided in the PEI Report, published as part of the statutory consultation under Chapter 12 (Socio-Economics and Land Use) and Chapter 13 (Transport and Access), as well as each chapter's supporting figures and appendices, including a Transport Assessment at Appendix 13A. Figures 12-3 and 13-1 of the PEI Report show the existing public rights of way; Figures 12-4 and 13-2 show which public rights of way would be temporarily closed during construction; and Figures 12-5 and 13-3 show the public rights of way and permissive paths post construction. Updated versions of these figures are included as part of Chapter 13 of the Environmental Statement [EN010106/APP/6.1] in the DCO application.</p> <p>While some public rights of way would be closed during construction, the Applicant would put in place appropriate measures to mitigate any closures and ensure they are for as short a period as possible. Construction would be phased so closures of public rights of way would not take</p>

Topic raised	Regard had by the Applicant
	<p>place for the whole of the period we are building the Scheme, or simultaneously. Mitigation for the temporary disruption to footpaths during construction includes having appropriately and clearly signed alternative routes and, where possible, the temporary closures will be planned and programmed to minimise disruption to users. The DCO application includes a Transport Assessment as Appendix 13B of the ES [EN010106/APP/6.2] and a Framework Construction Environmental Management Plan (CEMP) as Appendix 13C [EN010106/APP/6.2] providing details of mitigation during the construction period. Requirements to the draft DCO [EN010106/APP/3.1] secure the approval and implementation of both the CEMP and a Construction Traffic Management Plan.</p>
Construction, operations, and decommissioning	
<p>Concern about noise and light impacts during construction and operations.</p>	<p>This is considered in Chapters 10 and 11 of the PEI Report, published as part of the consultation, as well as the Framework CEMP included in Appendix 16C. An updated assessment is included in Chapter 11 of the Environmental Statement [EN010106/APP/6.1]</p>
<p>Further information required on the decommissioning of the Scheme, including the disposal of assets such as the PV panels and batteries.</p>	<p>A Decommissioning Environmental Management Plan (DEMP) would be prepared and implemented to manage the decommissioning of the Scheme. This plan would be produced for approval by the local planning authority prior to decommissioning and is secured by the draft DCO [EN010106/APP/3.1] ensuring that the Applicant delivers on the commitments it makes in respect of decommissioning. A Framework DEMP is submitted with the DCO Application as Appendix 16E of the ES [EN010106/APP/6.2].</p> <p>The DEMP 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 of the PEI Report provided further details during the statutory consultation.</p> <p>The DEMP will detail the mitigation measures to be adopted by the contractor during decommissioning so as to prevent and/or minimise effects on a 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.</p>

2.6 Ongoing engagement

2.6.1 Throughout the development process, the Applicant has engaged with stakeholders outside of the non-statutory and statutory consultation. Early engagement undertaken ahead of the non-statutory consultation is set out in section 2.2. Details of ongoing engagement with key stakeholders undertaken from the time of the non-statutory consultation in June 2019 up until the start of the statutory consultation in September 2020, including the composition of each group, when the engagement took place, a summary of discussions had, and appropriate action taken in response, is set out in **Table 2-5**. Where engagement referenced below is relevant to EIA, further detail is provided as appropriate in the relevant chapter of the Environmental Statement [EN010106/APP/6.1].

Table 2-5 Summary of ongoing engagement

Stakeholders engaged	Date	Summary of engagement	Action taken as appropriate
Cambridgeshire County Council, East Cambridgeshire District Council, Suffolk County Council and West Suffolk Council	19 June 2019	A workshop to discuss landscape and heritage assessments. The Applicant presented its approach to landscape and heritage assessments to attendees, including proposed viewpoints.	Following the meeting, the Applicant provided a detailed LVIA methodology clarifying viewpoints and methodology for preparing Visually Verified Montages to attendees.
Cambridge Wildlife Trust, Suffolk Wildlife Trust, Natural England, Cambridgeshire County Council, Suffolk County Council and West Suffolk Council	24 June 2019	A workshop to discuss ecology. This included discussion of the baseline ecological information, ongoing ecological surveys and use of the Department for Environment, Food and Rural Affairs (DEFRA) metric in biodiversity net gain calculations.	The Applicant considered attendee feedback on ongoing ecological surveys and provided details of schemes proposed to be included in the in-combination assessment.
Cambridgeshire County Council and Suffolk County Council	17 July 2019	A workshop to discuss the Scheme in relation to Public Rights of Way. This included identification of Public Rights of Way relevant to the Scheme, viewpoints for landscape and visual assessment from Public Rights of Way and potential enhancements to be provided through the Scheme.	The Applicant liaised further with Cambridgeshire County Council and Suffolk County Council regarding the scope of assessment for non-motorised users.
Historic England,	18 July 2019	A meeting providing an	Following the meeting,

Stakeholders engaged	Date	Summary of engagement	Action taken as appropriate
Cambridgeshire County Council and Suffolk County Council		update on the Scheme since the submission of the EIA Scoping Report and outlining the Applicant's Archaeological Evaluations Strategy.	the Applicant provided further detail on desk-based assessments and the assessment of scheduled monuments to attendees.
Darley and Godolphin Stud	19 July 2019	A site visit to the Snailwell Gallops.	The visit informed the Applicant's approach to landscape and visual impact assessment for this part of the Scheme.
Lucy Frazer MP	4 September 2019	The Applicant provided an update on the Scheme, including a summary of feedback from the non-statutory consultation.	The Applicant undertook to keep Ms Frazer MP updated on the Scheme at key milestones.
Parish Council Alliance	6 September 2019	<p>The Applicant was contacted by a representative of the Parish Council Alliance, at that time comprising Freckenham Parish Council, Worlington Parish Council, Snailwell Parish Council and Chippenham Parish Council, to request further engagement following the non-statutory consultation.</p> <p>The Applicant arranged a meeting on 6 September 2019 on this basis. This was cancelled at the request of the Parish Council Alliance, which advised its availability had changed and that it would provide alternative dates.</p>	<p>The Applicant sought to rearrange the meeting throughout September, October, and November 2019.</p> <p>While a meeting did not take place at this time, the Applicant met with the Parish Council Alliance subsequently on 15 July 2020 and 21 September 2020.</p>
RSPB	30 October 2019	The Applicant met with the RSPB on site to discuss stone curlew breeding sites and mitigation. This included discussion of historic stone curlew breeding sites.	The Applicant carried out further surveys, including further visits to known stone curlew breeding sites in 2020.
Cambridgeshire	31 October	A meeting to discuss	The Applicant convened

Stakeholders engaged	Date	Summary of engagement	Action taken as appropriate
County Council, East Cambridgeshire District Council, Suffolk County Council and West Suffolk Council	2019	feedback from the non-statutory consultation, the terms of a Planning Performance Agreement (PPA) with the host local authorities and further engagement through technical working groups covering landscape, visual impact and Public Rights of Way, ecology, highways, and archaeology and heritage.	technical working groups covering landscape, visual impact and Public Rights of Way, ecology, highways, and archaeology and heritage to support further engagement.
Landscape, visual impact and Public Rights of Way technical working group – Cambridgeshire County Council, East Cambridgeshire District Council, Suffolk County Council and West Suffolk Council	20 November 2019	A workshop to discuss landscape and non-motorised users. The Applicant summarised feedback from the non-statutory consultation and outlined design principles for landscaping, a draft Strategic Environmental Masterplan and an approach to non-motorised user assessment for feedback from attendees.	Taking into account feedback from attendees, the Applicant reviewed the provision of access in the Draft Outline Landscape and Ecology Management Plan (Appendix 10I of the PEI Report) and continued to engage with local authorities on landscape and non-motorised user assessment.
Cambridgeshire County Council, East Cambridgeshire District Council, Suffolk County Council and West Suffolk Council	26 November 2019	The Applicant provided an early draft of the SoCC on an informal basis for feedback from local authority officers. At this stage, the Applicant's proposed approach to consultation included public exhibitions.	The Applicant received written comments from officers at Cambridgeshire County Council, East Cambridgeshire District Council, Suffolk County Council and West Suffolk Council. Whilst the COVID-19 pandemic meant the Applicant revised the draft SoCC more widely, these comments informed its approach to updating the document.
Ecology technical working group - Natural England, Suffolk Wildlife	4 December 2019	A workshop to discuss ecology. This included discussion of feedback from the non-statutory	The Applicant considered feedback from attendees of the meeting and shared further information

Stakeholders engaged	Date	Summary of engagement	Action taken as appropriate
Trust, Suffolk County Council, West Suffolk Council, East Cambridgeshire District Council		consultation, the baseline ecological information, ecological surveys, the design principles for the Scheme and opportunities for biodiversity enhancements.	on proposed lighting with attendees.
Cllr Brian Harvey, member for Manor ward at West Suffolk Council	18 March 2020	The Applicant met with Cllr Brian Harvey, member for Manor ward at West Suffolk Council, to discuss its proposed approach to statutory consultation and engagement with parish councils within the vicinity of the Scheme.	The Applicant met with the Parish Council Alliance subsequently on 15 July 2020 and 21 September 2020.
Suffolk County Council and West Suffolk Council	23 April 2020	The Applicant provided an update to local elected members and officers at Suffolk County Council and West Suffolk Council. This included an update on the Scheme, the impact of the COVID-19 pandemic on the Scheme programme and consultation methods, the Applicant's proposal to form a working group to discuss consultation methodology, and the timeline for statutory consultation.	The Applicant convened a working group including planning officers from Cambridgeshire County Council, East Cambridgeshire District Council, Suffolk County Council and West Suffolk Council to discuss the preparation of the SoCC.
Cambridgeshire County Council and East Cambridgeshire District Council	6 May 2020	The Applicant provided an update to officers at Cambridgeshire County Council and East Cambridgeshire District Council. This included an update on the Scheme, the impact of the COVID-19 pandemic on the Scheme programme and consultation methods, the Applicant's proposal to form a working group to discuss consultation methodology, and the timeline for statutory	The Applicant convened a working group including planning officers from Cambridgeshire County Council, East Cambridgeshire District Council, Suffolk County Council and West Suffolk Council to discuss the preparation of the SoCC.

Stakeholders engaged	Date	Summary of engagement	Action taken as appropriate
		consultation.	
Archaeology and heritage technical working group - Historic England, Cambridgeshire County Council, East Cambridgeshire District Council, Suffolk County Council and West Suffolk Council	7 May 2020	A workshop to discuss archaeology and heritage. This included discussion of the archaeological and heritage context for the Scheme, heritage viewpoints, archaeology work strategy and the structure of the PEI Report.	Following the workshop, the Applicant reviewed the coverage of heritage viewpoints, continued to engage with attendees regarding its mitigation strategy for heritage sites, and updated its evaluation strategy.
Cambridgeshire County Council and East Cambridgeshire District Council – elected members	10 June 2020	The Applicant briefed elected members at Cambridgeshire County Council and East Cambridgeshire District Council. The meeting included an update on the Scheme, the regard had by the Applicant to feedback from the non-statutory consultation, and a timeline for the statutory consultation.	The Applicant responded to a range of questions from attendees at the meeting and undertook to brief elected members again prior to the statutory consultation.
Suffolk County Council and West Suffolk Council – elected members	18 June 2020	The Applicant briefed elected members at Suffolk County Council and West Suffolk Council. The meeting included an update on the Scheme, the regard had by the Applicant to feedback from the non-statutory consultation, and a timeline for the statutory consultation.	The Applicant responded to a range of questions from attendees at the meeting and undertook to brief elected members again prior to the statutory consultation.
Local authority consultation working group – Cambridgeshire County Council, East Cambridgeshire District Council,	23 June 2020	The Applicant convened a working group including planning officers from Cambridgeshire County Council, East Cambridgeshire District Council, Suffolk County Council and West Suffolk	The Applicant considered participants' feedback and developed a proposed approach to consultation for discussion.

Stakeholders engaged	Date	Summary of engagement	Action taken as appropriate
Suffolk County Council and West Suffolk Council		Council to discuss the preparation of the SoCC. This initial meeting sought participants' views on what needed to be considered in developing the approach to statutory consultation with the local community, including the impact of the COVID-19 pandemic.	
Parish Council Alliance	15 July 2020	<p>The Applicant met with representatives from Chippenham Parish Council, Freckenham Parish Council, Isleham Parish Council, Kennett Parish Council, Mildenhall Town Council, Moulton Parish Council, Red Lodge Parish Council, Snailwell Parish Council, West Row Parish Council and Worlington Parish Council, as well as local elected representatives from West Suffolk Council and Suffolk County Council.</p> <p>At the meeting, the Applicant provided an update on the Scheme, environmental impact assessments and the planned statutory consultation. This included a focus on how feedback from the non-statutory consultation had informed the Applicant's approach to mitigating landscape and visual impacts from the Scheme.</p>	The Applicant responded to a range of questions from attendees, on topics including the Scheme boundary, agricultural land classification, decommissioning, carbon impacts, landscape and visual impact and consultation.
Local authority consultation working group – Cambridgeshire County Council, East Cambridgeshire	17 July 2020	The Applicant reported back to officers from Cambridgeshire County Council, East Cambridgeshire District Council, Suffolk County Council and West Suffolk	The Applicant considered feedback from the meeting in preparing the draft SoCC for formal consultation under s47 of the PA 2008.

Stakeholders engaged	Date	Summary of engagement	Action taken as appropriate
District Council, Suffolk County Council and West Suffolk Council		Council on its proposed approach to consultation for inclusion in the SoCC.	
Local authority consultation working group – Cambridgeshire County Council, East Cambridgeshire District Council, Suffolk County Council and West Suffolk Council	24 July 2020	The Applicant provided early sight of draft copy for the SoCC to the host local authorities before formally consulting them.	The Applicant commenced formal consultation on the SoCC on 3 August 2020.
Suffolk County Council and West Suffolk Council – elected members	17 September 2020	The Applicant briefed elected members at Suffolk County Council and West Suffolk Council on the upcoming statutory consultation. This included an update on the Scheme, a summary of the Applicant's approach to consultation, and a summary of the consultation materials.	The Applicant responded to a range of questions from attendees prior to the commencement of statutory consultation.
Jockey Club	17 September 2020	The Applicant provided an update on the Scheme prior to the commencement of statutory consultation. This included a presentation on the approach taken to landscape and visual impacts for Sunnica West.	The Applicant responded to a range of questions from attendees prior to the commencement of statutory consultation.
Cambridgeshire County Council and East Cambridgeshire District Council – elected members	18 September 2020	The Applicant briefed elected members at Cambridgeshire County Council and East Cambridgeshire District Council on the upcoming statutory consultation. This included an update on the Scheme, a summary of the Applicant's approach to consultation, and a	The Applicant responded to a range of questions from attendees prior to the commencement of statutory consultation.

Stakeholders engaged	Date	Summary of engagement	Action taken as appropriate
		summary of the consultation materials.	
Parish Council Alliance	21 September 2020	The Applicant met with representatives from Burwell Parish Council, Chippenham Parish Council, Fordham Parish Council, Freckenham Parish Council, Herringswell Parish Council, Isleham Parish Council, Kennett Parish Council, Mildenhall Town Council, Moulton Parish Council, Red Lodge Parish Council, Snailwell Parish Council, West Row Parish Council and Worlington Parish Council. The meeting included an update on the Scheme, a summary of the Applicant's approach to consultation, and a summary of the consultation materials.	The Applicant responded to a range of questions from attendees prior to the commencement of statutory consultation.
Suffolk County Council	21 September 2020	A meeting with county archaeologists to discuss trial trenching strategy.	The Applicant provided updated information to attendees and arranged a further meeting on 20 October 2020.

3 EIA scoping

3.1.1 The Scheme is considered to be “EIA development” as defined by the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. As a result, the Applicant proceeded to EIA scoping without requesting a screening opinion from the Secretary of State (to confirm whether the Scheme was EIA development). As such, the Applicant prepared a scoping report in support of its application to the Secretary of State for a scoping opinion as to the scope, and level of detail of the information to be provided in its environmental statement.

3.1.2 On 13 March 2019 the Applicant submitted its request for a scoping opinion under Regulation 10(1) of the EIA Regulations 2017 to the Planning Inspectorate (on behalf of the Secretary of State) and at the same time gave its notification under Regulation 8(1)(b) of the EIA Regulations 2017 that the Applicant proposed to provide an environmental statement in respect of the Scheme.

3.1.3 A scoping opinion was adopted by the Secretary of State on 23 April 2019. The Environmental Statement submitted as part of the application is based on the scoping opinion and the scoping opinion was also considered in the production of the PEI Report published during the statutory consultation.

3.1.4 In addition, following receipt of the scoping opinion, the Applicant reviewed the list of consultees contacted by the Planning Inspectorate as part of its consultation on the scoping report. These are the bodies listed in Appendix 1 of the Planning Inspectorate’s scoping opinion, available in Appendix 1B of the ES [EN010106/APP/6.2]. This was to ensure that all organisations contacted by the Planning Inspectorate were included in subsequent consultation activity. Through this review, the Cambridgeshire and Peterborough Combined Authority was identified as an additional, non-prescribed consultee. The Applicant included the Combined Authority in its subsequent consultation activity. In addition, a number of other non-prescribed consultees were identified which, while they would be classified as relevant statutory undertakers under Schedule 1 of the APFP Regulations and Table 2 of the Annex to PINS Advice Note Three, were not included as prescribed consultees because the Application was not likely to affect their functions as statutory undertakers given the location of, and proposals comprising, the Scheme (and therefore the requirement of Column 2 Schedule 1 was not satisfied). These bodies are included in the list at **Appendix H-1**.

3.1.5 The Applicant did not receive notification of additional consultees under reg 11(1)(c) of the EIA Regulations 2017.

3.1.6 A copy of the letter, scoping report and the acknowledgment are provided within **Appendix B-1**.

Compliance with the consultation requirements of Regulations 12 and 13 of the EIA Regulations 2017 is addressed in the following section of this report.

4 Statutory consultation

4.1 Overview of statutory consultation

- 4.1.1 The Applicant conducted a period of statutory consultation on the Scheme from 22 September 2020 until 18 December 2020.
- 4.1.2 The purpose of the consultation was to seek the views of statutory consultees and the public on the Scheme; the potential short and long term impacts of the Scheme during construction, operations, and decommissioning; and the Preliminary Environmental Information (PEI) Report.
- 4.1.3 The Applicant conducted consultation under s42, s47 and s48 of the PA 2008 and Regulation 13 of the EIA Regulations 2017 in parallel. This meant that all materials made available for consultation under s47 and s48 of the PA 2008 were available to consultees under s42 of the PA 2008 and Regulation 13 of the EIA Regulations 2017.
- 4.1.4 Initially, the consultation was scheduled to last from 22 September 2020 to 2 December 2020. During the consultation period, the Applicant extended the deadline for responses to 18 December 2020.
- 4.1.5 The Applicant extended the consultation period for two principal reasons:
 - a. On a precautionary basis, to ensure that all consultees under s42 of the PA 2008 received notification of minor changes to the Order limits with more than 28 days to comment. A summary of the changes to the Scheme boundary and the way the Applicant notified consultees about them is set out in section 4.7; and,
 - b. In view of the enhanced public health measures relating to the COVID-19 pandemic adopted by the Government at a national level from 5 November 2020 until 2 December 2020.
- 4.1.6 Details of the Applicant's approach to publicising the extension are set out in section 4.7.
- 4.1.7 Both the originally advertised consultation period and the extended consultation period significantly exceeded the 28-day minimum set out in section 45(2) of the PA 2008 and Regulation 4(3)(i) of the APFP Regulations.

4.2 Preparation of the SoCC

- 4.2.1 As prescribed by s47(1) of the PA 2008, the Applicant prepared a SoCC setting out how it proposed to consult people living in the vicinity of the land affected by the Scheme about its proposal. Before preparing the SoCC to reflect the requirements of s47 of the PA 2008, the Applicant consulted with each local authority that is within s43(1) of the PA 2008 on a draft of the SoCC, as required by s47(2) of the PA 2008. Prior to that formal consultation, the Applicant had also undertaken various informal discussions on the SoCC with the relevant local authorities, as set out in **Table 2-5**. The Applicant then finalised the SoCC, having regard to the

responses from local authorities, before publishing it in accordance with s47(6) of the PA 2008.

Identification of local authorities within s43(1) of the PA 2008

- 4.2.2 The Applicant identified Cambridgeshire County Council, East Cambridgeshire District Council, Suffolk County Council and West Suffolk Council as local authorities within s43(1) of the PA 2008 for the purposes of consultation on the SoCC under section s47(2) of the PA 2008 (the host authorities).

Development of the SoCC

- 4.2.3 The Applicant's preparation of a draft SoCC took into account best practice and guidance from the Inspectorate, early engagement with host local authorities (as set out in **Table 2-5**), lessons learned from the non-statutory public consultation summarised in chapter 2, and desk research.
- 4.2.4 This included proactively seeking the views of the host authorities on the Applicant's proposed approach to community consultation during the preparation of the SoCC.
- 4.2.5 Initially, the Applicant prepared an early draft SoCC for informal discussion with the host authorities in November 2019. At this time, the Applicant expected to consult in early 2020 and proposed a programme of consultation featuring face-to-face engagement with local residents at public exhibitions. The Applicant shared this draft of the SoCC with the host authorities on 26 November 2019.
- 4.2.6 Social distancing measures introduced by the Government from 20 March 2020 in response to the COVID-19 pandemic meant that the Applicant subsequently reconsidered the consultation methods proposed in the draft SoCC described in 4.2.5.
- 4.2.7 In preparing our approach to consultation, the Applicant considered Government guidance on COVID-19 and advice from the host authorities. In addition to this, the Applicant also considered the results of non-statutory consultation and best practice guidance such as the National Infrastructure Planning Association's paper Development Consent Orders and the Coronavirus Pandemic (21 April 2020).
- 4.2.8 The Applicant subsequently invited representatives from the host authorities to participate in a Consultation Working Group. The purpose of the Consultation Working Group was to seek the views of the host authorities on potential approaches to community consultation in the context of the COVID-19 pandemic.
- 4.2.9 At an initial meeting on 23 June 2020, the Applicant sought the views of the Consultation Working Group on the previous non-statutory consultation, good practice in consultation, relevant examples of consultation on other projects, and the implications of these topics for consultation design.
- 4.2.10 The Applicant then developed a consultation programme for discussion with the Consultation Working Group at a further meeting on 17 July 2020. At this meeting, the Applicant set out how it had considered feedback from the

previous meeting and sought views on the approach to consultation it proposed to include in the SoCC.

- 4.2.11 Feedback from this meeting informed the draft SoCC presented to the host authorities for consultation. Minutes from meetings of the working group on the SoCC along with a copy of the draft SoCC issued for discussion purposes are included in **Appendix C-1**.

Contents of the draft SoCC

- 4.2.12 The draft SoCC included the following information and proposals for consulting with the local community:
- a. An overview of the document;
 - b. A statement of the Applicant's intention to submit a DCO application and details of where to find out more about the planning process;
 - c. A summary of the Scheme;
 - d. A definition of consultees under s47 of the PA 2008, including three zones of consultation categorising consultees based on their vicinity to the Scheme;
 - e. Details of the scope of the consultation as being to seek views on the Scheme, the potential short and long term impacts of the Scheme during construction, operations, and decommissioning, and the PEI Report;
 - f. A consultation period to last from 22 September 2020 to 2 December 2020 (as it was proposed at that time);
 - g. Details of the methods the Applicant proposed to engage with the local community, including:
 - Sending a consultation brochure providing a non-technical overview of the scheme, the EIA process, the consultation and planning process, how to take part in the consultation, and proposed next steps to all addresses in consultation zone 1;
 - Hosting a series of webinars, including a presentation regarding the Scheme and an opportunity to ask questions;
 - Launching a virtual exhibition and publishing consultation information on the consultation website;
 - Offering the opportunity to book individual appointments to discuss the Scheme by telephone;
 - Contacting community and voluntary organisations within consultation zone 1 to offer direct engagement and share a briefing pack including sections designed to support the promotion of the consultation through existing communication channels such as social media;
 - Accepting enquiries and responses online through the consultation website, by freephone, freepost or email;
 - Publicising the consultation online and through the local media;

- Compliance with the most up to date legal requirements in relation to public deposits;
 - h. Details of the Applicant's proposed approach to consultation in the context of the COVID-19 pandemic, including how it would publicise any change in the consultation required due to changes in social distancing requirements; and,
 - i. Setting out how the Applicant would have regard to comments received and how it would move forward with a DCO application following the statutory consultation.
- 4.2.13 A copy of the draft SoCC issued to the host authorities for consultation is included along with the local authorities' comments in **Appendix C-3**.

Consultation on the draft SoCC

- 4.2.14 The Applicant wrote to Cambridgeshire County Council, East Cambridgeshire District Council, Suffolk County Council and West Suffolk Council on 3 August 2020 enclosing a copy of the draft SoCC and requesting comments by 1 September 2020.
- 4.2.15 The local authorities identified as within s43(1) of the PA 2008 therefore received 28 days to respond to the draft SoCC, in accordance with s47(3) of the PA 2008.
- 4.2.16 A copy of the consultation letter to each local authority is included in **Appendix C-2**.
- 4.2.17 Separately, the Applicant provided a draft copy of a poster summarising its approach to consultation to the same authorities on 18 August 2020. The Applicant noted in providing the draft poster that it was not part of the SoCC or included within consultation on the SoCC.

Local authority responses to the draft SoCC

- 4.2.18 The Applicant received a joint response to the draft SoCC from Cambridgeshire County Council, East Cambridgeshire District Council, Suffolk County Council and West Suffolk Council on 1 September 2020.
- 4.2.19 This presented the local authorities' response to the draft SoCC as comments made online on a PDF version of the document, along with a covering letter.
- 4.2.20 The response included some comments on the draft poster summarising the Applicant's approach to consultation referenced in 4.2.17. While this poster was not part of the SoCC, the Applicant had regard to these comments.
- 4.2.21 A copy of the joint response is included in **Appendix C-3**.

Regard had to local authority responses to the draft SoCC

- 4.2.22 The Applicant has had regard to responses from the local authorities consulted on the draft SoCC as required by s47(5) of the PA 2008. **Table 4-1** summarises suggestions made by local authorities on the draft SoCC and the regard had to them by the Applicant.

Table 4-1 Regard had to the joint local authority response to the draft SoCC

Page of draft SoCC	Comment made by local authorities	Regard had to suggestion	Amendment to SoCC (if applicable)
1	As a general point, the SoCC is text heavy and the inclusion of appropriate graphics/icons to break up the text would assist. Where used, these should be legible and of an appropriate size.	There is some tension between this comment and comments throughout the document requesting more detail.	The Applicant sought to strike a balance and avoid repetition but where specific additional detail was requested, this was included in the SoCC. Graphics were included in the SoCC as appropriate – for example, Figure 1 illustrating the planning process.
1	This section could be shorter and would be better reordered to: “the proposal is an NSIP, unlike other applications for Planning Permission, we apply for a DCO to SoS rather than the LPA. Part of this process is to publish, which is a duty and one that Sunnica see as important.” This process is then repeated a lot in the document (such as under Figure 10) but the whole process is not clearly set out apart from the diagram.	This was noted and actioned.	Text revised in response to comment. This included changes on pages 1 and 2.
1	I think we need the consultation dates upfront	This was noted and actioned.	Consultation dates were added into the first paragraph on this page.
1	Reiterate that Sunnica want the feedback and want to involve the community - it shouldn't come across that the	This was noted and actioned.	Text amended to read: “We very much want feedback from the local community on our proposals and see this

Page of draft SoCC	Comment made by local authorities	Regard had to suggestion	Amendment to SoCC (if applicable)
	consultation is only taking place because it is a requirement of legislation.		document as an important part of the process.”
1	Page numbers are required on the document.	This was noted and actioned.	Page numbers were added to the SoCC.
2	There is a high level of reference to the requirements of the planning DCO process without a clear demonstration of how this is fulfilled and the benefits of this immediately below or referenced to.	This was noted and actioned.	Text amended to read: “It also provides a fixed role for local authorities and means we will be following a well-established and clear process to develop our proposals.”
2	Suggest this needs to be a whole page so it’s easier to view? Spell check – ‘proposal’ under 1. ‘preliminary’ under 3.	This was noted and actioned.	Figure 1 was moved to its own page and updated to match that included in other consultation materials.
2	Will people understand this? I think more of an explanation is needed of what EIA development is, what an ES is and how this differs from a PEIR?	This was noted and actioned.	Text amended to read: “For the proposed Sunnica Energy Farm, we are required to carry out an Environmental Impact Assessment (EIA) of our proposals as part of the planning process. In legal terms, this means it is considered to be ‘EIA development’ for the purposes of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. This means we must

Page of draft SoCC	Comment made by local authorities	Regard had to suggestion	Amendment to SoCC (if applicable)
			<p>assess potential environmental impacts from our proposals and, where appropriate, propose mitigation. We will report on this process in a document called an Environmental Statement ('ES') when we submit our DCO application.</p> <p>At this consultation stage, we will be sharing and seeking feedback on the preliminary results of our assessments. We will do so in a document called a Preliminary Environmental Information Report (PEIR)."</p>
2	Yes – First sentence isn't very informative, that it comes under EIA regs is implicit. Explain what EIA is.	This was noted and actioned.	As above.
3	There is a need to better describe the nature of the project, the different elements (solar panels, battery storage, electric cable connections, the connection to the sub-station at Burwell). This is important as the impacts are different to each community. It is welcome this is recognised in the webinars but does not come through strong enough elsewhere.	The draft SoCC set out that the Scheme will be described in the consultation materials. On balance, the Applicant considered that the SoCC was not the appropriate place to describe the Scheme set out in the level of detail in the comment, particularly given other comments made as part of the same response encouraging textual brevity.	No change made.
3	Plan should have a	This was noted and	The Scheme boundary

Page of draft SoCC	Comment made by local authorities	Regard had to suggestion	Amendment to SoCC (if applicable)
	dedicated landscape format page – additionally this should be included earlier in the document.	actioned.	plan was included at A3 in landscape on page 6.
3	Would prefer an A3 sized plan. This is a big area and the plan needs to be clear for all people.	This was noted and actioned.	The Scheme boundary plan was included at A3 in landscape on page 6.
3	Agree. The plan needs to be clear enough for residents to be able to assess how affected they may be by the proposal and whether they should participate in the consultation process.	This was noted and actioned.	The Scheme boundary plan was included at A3 in landscape on page 6.
3	Expand on the type of 'materials' that will be published - e.g. exhibition boards, maps, videos etc.	This information was included in the draft SoCC in the 'Consulting the community' section.	No change made.
3	It is important as part of the consultation to be clear on the technology and to give a sense of scale. To this end in describing the different infrastructure a simple pictorial diagram would be helpful. In addition any mock up images of what the infrastructure will look like should be scaled with something everyone can relate to, such as an average height adult, or average family car.	On balance, the Applicant believed this is more appropriately addressed in the consultation materials. The SoCC is a statement of how the Applicant will consult rather than a detailed summary of the scheme.	No change made.
4	Is it for the SoCC to document the local authorities' feedback to	This was noted and actioned.	This was provided in Table 1 on page 7.

Page of draft SoCC	Comment made by local authorities	Regard had to suggestion	Amendment to SoCC (if applicable)
	the draft SoCC? Is there a need here for a simple statement to say who you have consulted as part of the drafting of the SoCC?		
4	[Redacted] is right in his comment, the previous rounds of consultation should inform their approach and they could state that local authorities have, as an example, provided comments on the SoCC.	This was noted and actioned.	This was provided in Table 1 on page 7.
4	Members are keen for the document to acknowledge local 'feeling' in relation to the proposal. Reinforce that views expressed as part of the statutory consultation will be taken into account.	The Applicant provided an overview to responses to the non-statutory consultation in the booklet published as part of the statutory consultation. The Applicant's commitment to having regard to responses to the statutory consultation is included in the SoCC on page 20.	No change made.
4	Should be Kennett.	This was noted and actioned.	This was corrected to Kennett.
5	Repeats the point that there has already been public consultation. Change language to "we want to continue to involve" and "moving to this next (statutory) consultation phase".	This was noted and actioned.	Text amended to read, 'We want to continue to ensure that those potentially affected by our proposals have the opportunity to understand them and provide their views.'
5	If we are at this stage, why is the draft poster so lacking in detail.	This comment refers to the poster described at 4.2.16. The purpose of the poster was to	No change made.

Page of draft SoCC	Comment made by local authorities	Regard had to suggestion	Amendment to SoCC (if applicable)
		summarise the Applicant's approach to consultation rather than the proposals. The consultation booklet and other materials referenced in the SoCC summarised the proposals.	
5	...through a period of statutory...	This was noted and actioned.	Text amended to read: "We are now sharing details of our advanced design proposals through a period of statutory public consultation to provide the community with further information about the proposed Sunnica Energy Farm and the opportunity to further influence our design proposals."
5	In relation to responding to Covid 19, proposals including a virtual public exhibition and webinars are very welcome. Social media is mentioned a number of times but it is not clear what is to be used. Will Sunnica have its own twitter and facebook page for example. Noted there is mention to use local authorities, parishes, and community channels.	Details of use of social media were provided in table 3 in the draft SoCC. The Applicant proposed social media advertising, as per the wording in table 3, rather than the creation of social media profiles.	No change made.
5	It does not say what changes are being made – there are webinars and virtual exhibition are being proposed rather	This information was provided in table 3 in the draft SoCC.	No change made.

Page of draft SoCC	Comment made by local authorities	Regard had to suggestion	Amendment to SoCC (if applicable)
	than events. What else and what is the publicity on these locally? Adverts in parish magazines? Posters in supermarkets doctor surgeries?		
6	Explain how the PEIR fits into the EIA process	This was noted and actioned.	Text amended to read, "We are in the process of carrying out an EIA for the proposed Sunnica Energy Farm. The proposed Sunnica Energy Farm is EIA development (see page 2 above), and therefore we will be publishing a Preliminary Environmental Information Report (PEIR) as one of our consultation materials. The PEIR builds upon the findings of our Scoping Report and the feedback received during the non-statutory consultation. It will incorporate the results of the environmental surveys that we have carried out to date and will set out our preliminary conclusions on the potential significant effects of the proposed Sunnica Energy Farm on the environment. The PEIR gives information about the potential significant environmental effects of the proposed Sunnica Energy Farm and the measures proposed to reduce or avoid those

Page of draft SoCC	Comment made by local authorities	Regard had to suggestion	Amendment to SoCC (if applicable)
			effects to assist respondents in making well-informed responses to the consultation.”
6	Included in the list of additional organisations to consult it is important to include infrastructure organisations including Highways England and National Grid. This will demonstrate the full scope of the project and organisations to involve.	This was noted and actioned.	References to Highways England and National Grid were added to the list of consultees referenced on page 14.
7	Can this be made bigger. The map of zone 1 consultation is very small.	This was noted and actioned.	This was provided at full page as Figure 3 on page 12.
8	If the zone 2 is just for Cambridgeshire and Suffolk can the other areas be 'washed out'?	This was noted and actioned.	This was addressed in Figure 4 on page 13.
8	Figures 4 and 5 should be consistent with the design approach used for the previous figures.	This was noted and actioned.	This was addressed in Figures 4 and 5 on page 13.
9	This is quite repetitive – could it be slimmed down by setting a baseline of the things that apply to each group – then add in the extras that apply to zones 1 and 2? Just an idea and might not be possible...	The Applicant believes it is clearer to state the commitments for each zone separately.	No change made.
9	This is a good example of where icons could be used for text heavy information, e.g., small graphics to illustrate information packs, virtual	It is important for the SoCC to be clear when making commitments. As such, these are made specifically in text format rather than through	No change made.

Page of draft SoCC	Comment made by local authorities	Regard had to suggestion	Amendment to SoCC (if applicable)
	exhibitions, webinars etc.	graphics, which may be more open to interpretation.	
9	Is the non-technical summary the poster? If so, I feel the draft poster sent around does not provide a non-technical summary. It appears to rely on the user going to a website to find more information.	This was provided in the consultation booklet.	No change made.
9	BBC should be supplemented with other regional and local broadcasters.	This was noted and actioned.	Other regional and local broadcasters were added to Table 3 on page 14.
10	How are the invites sent?	Details of how to register for webinars were included in the consultation booklet, virtual exhibition and the consultation website, as well as social media adverts.	No change made.
11	The current layout has a mix of actions for different levels of restrictions associated with Covid 19. It would be clearer to state what is currently proposed i.e. under current level 3, and have a separate section after to list the addition actions should restrictions be relaxed. This should include a minimum of 2 weeks' notice of any new events, exhibitions.	This was noted and actioned.	This section was simplified for clarity and is available on page 16 of the SoCC.
11	People might not know what this means – need	This was noted and	This was noted and

Page of draft SoCC	Comment made by local authorities	Regard had to suggestion	Amendment to SoCC (if applicable)
	an explanation?	actioned.	actioned.
11	What about local lock downs?	This was noted and actioned.	This was noted and actioned.
11	Not sure I understand this wording	This was noted and actioned.	This was noted and actioned.
11	Why this date?	This date was selected to allow time to organise and publicise events.	No change made.
11	More than a view – regulations have been changed?	This was noted and actioned.	The reference to deposit points was removed as they were not available on enquiry.
11	Buildings might open, but it might not be possible for documents to be on deposit.	This was noted and actioned.	The reference to deposit points was removed as they were not available on enquiry.
11	One presentation but many webinars? Will not different presentations be given at different webinars?	This was noted and actioned.	The reference to “a presentation” was changed to “presentations.”
12	Need to add pre-paid envelope will be included.	This was noted and actioned.	A reference to the pre-addressed Freepost envelope was added at the point highlighted by the comment.
12	Refers to adhering to government guidance but does not say how. This will mean little to most.	This was noted and actioned.	The highlighted guidance was removed.
12	Who?	This was not considered an appropriate level of detail for the SoCC. A list of groups which are prescribed under s42 of the PA 2008 and which were consulted are	No change made.

Page of draft SoCC	Comment made by local authorities	Regard had to suggestion	Amendment to SoCC (if applicable)
		included in Appendix E-1 .	
13	Feel like there should be one on Landscape and Biodiversity.	This was included in the webinars regarding environmental impact assessment.	The reference to these webinars was changed to reference landscape and biodiversity specifically.
13	Need to add district's or nearby villages, so people are clearer on which ones to attend.	Figure 2 on page 6 allowed readers to identify which webinars they would consider relevant to them.	No change.
13	Do you have provisional dates for the webinars? How much time is there between the last webinars and the close of the consultation?	This was noted and actioned.	Dates for the webinars were confirmed and included in the final SoCC at page 19.
13	It is important the option to phone and discuss the proposals is as accessible as possible (in terms of number of days available as well as a range of times during the day) for those that do not readily use IT. Whilst technology is an opportunity for some, it is important to recognise it is not accessible for all and so alternatives are as important.	This was noted and this is reflected in planning for the surgeries. Details of how to book a telephone appointment were included in the consultation booklet sent to residents within Consultation Zone 1 by post and in advertising in print media. It was possible to register for an appointment by phone only and the Applicant made a range of appointment times available.	No change.
13	Telephone number should be freephone	The telephone number included in the draft SoCC and used during the consultation (0808 168 7925) is a Freephone number.	No change.

Page of draft SoCC	Comment made by local authorities	Regard had to suggestion	Amendment to SoCC (if applicable)
14	Libraries are allowing documents on deposit?	References to deposit points removed as public buildings not accepting documents.	The reference to deposit points was removed as they were not available on enquiry.
14	<p>Are people going to be able to handle documents? What form will the materials take? e.g. will there be exhibition boards, paper copies of documents?</p> <p>Is there a need for additional computers etc. to be made available for those that do not have equipment at home to use specifically to access the Sunnica consultation?</p> <p>Preferable to have phone numbers here for those that do not have internet access so that they can make appointments?</p> <p>What arrangements have been made with libraries for access?</p>	This was noted and actioned.	The reference to deposit points was removed as they were not available on enquiry.
14	The document should recognise the COVID is an issue and be clear what information will be available at these points and whether people will be allowed to review documentation at these premises and what the arranges are.	This was noted and actioned.	The reference to deposit points was removed as they were not available on enquiry.
14	The table of potential public information points I would advise is better omitting to save	This was noted and actioned.	The reference to deposit points was removed as they were not available

Page of draft SoCC	Comment made by local authorities	Regard had to suggestion	Amendment to SoCC (if applicable)
	confusion, being the current position is these are not available. Could replace with a statement stating intent to use public buildings, community facilities and other locations should restrictions allow.		on enquiry.
15	What materials will be made available here? Will it be the same as the libraries? Are people free to visit without going into the shop/cafe? What is the reason for this choice of venue? Does the owner have an interest in the development?	This was noted and actioned.	The reference to deposit points was removed as they were not available on enquiry.
16	5pm on...	Noted and actioned.	The text highlighted was amended to reflect this comment.
16	Telephone number should be freephone	The telephone number included in the draft SoCC and used during the consultation (0808 168 7925) is a Freephone number.	No change.

Publication of the SoCC

- 4.2.23 As prescribed by s47(6) of the PA 2008, the Applicant made the SoCC available online on the Scheme website from 17 September 2020.
- 4.2.24 The Government has confirmed that placing materials on a website maintained by or on behalf of the Applicant meets the requirement to place information on public deposit in the Infrastructure Planning (Publication and Notification of Applications etc.) (Coronavirus) (Amendment) Regulations 2020 (the 2020 Regulations).
- 4.2.25 The Applicant also publicised the SoCC's availability in newspapers circulated in the vicinity of the land, as prescribed by s47(6) of the PA 2008. Details of the publication of these notices are included in **Table 4-2**. Copies

of the final SoCC notices as published (which clearly confirm the name of the publication and the date) are provided within **Appendix D-1**.

Table 4-2 Publication of notice of availability of SoCC

Date published	Newspaper
17 September 2020	Newmarket Journal
17 September 2020	Ely Standard

4.3 Consultation under s42 of the PA 2008

- 4.3.1 S42 of the PA 2008 requires the Applicant to consult with the prescribed consultees (s42(1)(a)), landowners, those with an interest in the land and those who would or might be entitled to make a relevant claim under s42(1)(d) and relevant local authorities (s42(1)(b)).

Identification of consultees under s42(1)(a)

- 4.3.2 Prescribed consultees are defined in Schedule 1 of the APFP Regulations. This also makes provision through a 'circumstances' test for whether there is a requirement to consult a specific party. **Appendix E-1** sets out each consultee prescribed in Schedule 1 of the APFP Regulations, whether they were included in the consultation, and justification for that inclusion. Regard was had to the Planning Inspectorate's Advice Note Three: EIA Notification and Consultation in identifying the consultation bodies.

Identification of consultees under s42(1)(b)

- 4.3.3 S42(1)(b) of the PA 2008 requires the Applicant to consult with the local authorities identified in s43 of the PA 2008, which sets out four categories of authority:
- A is a neighbouring local authority (s43(2)) that shares a boundary with a unitary council or lower-tier district 'B' council within whose area development is situated;
 - B is either a unitary council or a lower-tier district council in which the development is situated – a host local authority;
 - C is an upper-tier county council in which the development is situated – a host local authority; and,
 - D is either a unitary council or an upper tier county council which shares a boundary with a host 'C' authority – a neighbouring local authority (s43(2)a)).
- 4.3.4 Details of the identification of relevant local authorities, including whether they are an A, B, C or D authority, and the criteria for their identification, are included in **Table 4-3**. **Figure 4-1** displays the relationship between the authorities.

Table 4-3 Identification of consultees under s42(1)(b)

Name	A, B, C or D authority	Criteria for identification
Babergh District Council	A	Babergh District Council is a lower tier district authority which shares a boundary with a B authority, West Suffolk Council.
Bedford Borough Council	D	Bedford Borough Council is a unitary authority which shares a boundary with a C authority, Cambridgeshire County Council.
Borough Council of Kings Lynn and Norfolk	A	The Borough Council of Kings Lynn and West Norfolk is a lower tier district authority which shares a boundary with two B authorities, East Cambridgeshire District Council and West Suffolk Council.
Braintree District Council	A	Braintree District Council is a lower tier district authority which shares a boundary with a B authority, West Suffolk Council.
Breckland District Council	A	Breckland District Council is a lower tier district authority which shares a boundary with a B authority, West Suffolk Council.
Broads Authority	D	The Broads Authority is not a lower-tier district council and shares a boundary with a C authority, Suffolk County Council.
Cambridgeshire County Council	C	Cambridgeshire County Council is an upper tier county authority in which part of the Scheme is located.
Central Bedfordshire Council	D	Central Bedfordshire Council is a unitary authority which shares a boundary with a C authority, Cambridgeshire County Council.
East Cambridgeshire District Council	B	East Cambridgeshire District Council is a lower tier district authority in which part of the Scheme is located.
Essex County Council	D	Essex County Council is an upper tier county authority which shares a boundary with two C authorities, Cambridgeshire County Council and Suffolk County Council.
Fenland District Council	A	Fenland District Council is a lower tier district authority which shares a boundary with a B authority, East Cambridgeshire District Council.

Name	A, B, C or D authority	Criteria for identification
Hertfordshire County Council	D	Hertfordshire County Council is an upper tier county authority which shares a boundary with a C authority, Cambridgeshire County Council.
Huntingdonshire District Council	A	Huntingdonshire District Council is a lower tier district authority which shares a boundary with a B authority, East Cambridgeshire District Council.
Mid Suffolk Council	A	Mid Suffolk Council is a lower tier district authority which shares a boundary with a B authority, West Suffolk Council.
Norfolk County Council	D	Norfolk County Council is an upper tier county authority which shares a boundary with two C authorities, Cambridgeshire County Council and Suffolk County Council.
Northamptonshire County Council	D	Northamptonshire County Council is an upper tier county authority which shares a boundary with a C authority, Cambridgeshire County Council.
Peterborough City Council	D	Peterborough City Council is a unitary authority which shares a boundary with a C authority, Cambridgeshire County Council.
South Cambridgeshire District Council	A	South Cambridgeshire District Council is a lower tier district authority which shares a boundary with two B authorities, East Cambridgeshire District Council and West Suffolk Council.
Suffolk County Council	C	Suffolk County Council is an upper tier county authority in which part of the Scheme is located.
West Suffolk Council	B	West Suffolk Council is a lower tier district authority in which part of the Scheme is located.



Figure 4-1 Relationships between A, B, C and D authorities under s43 of the PA 2008. Please note the Broads Authority is not shown.

Identification of consultees under s42(1)(d)

- 4.3.5 S42(1)(d) of the PA 2008 requires the Applicant to consult each person who is within one or more of the categories set out in s44 of the PA 2008. This requires the developer to consult with landowners, lessees, tenants or occupiers (Category 1 persons, as per s44(1)); those with an interest in the land or certain powers with respect to the land (Category 2 persons, s44(2)); and, those who the Applicant thinks would or might be entitled to make a relevant claim under s44(4) (Category 3 persons). These people are also set out in the Book of Reference [EN010106/APP/4.3].
- 4.3.6 The Category 1 persons were identified via a diligent inquiry process covering six research methods: title information, land interest questionnaire, environmental impact assessment information, host and Companies House searches, site investigations, and internet-based research. The Applicant's process of diligent inquiry made use of the methodology detailed below.
- 4.3.7 Having established the proposed Order limits, the Applicant set land referencing limits and set a 100-metre buffer (50 metres on either side) around the Order limits to identify the necessary Land Registry data.

- 4.3.8 The Land Registry data was used to create land ownership parcels and obtain title information. All land within the identified limits was parcelled and each parcel was given a unique reference number. This was also supplemented by desktop referencing and the use of publicly available information. Details for registered companies were checked through the use of company registers such as Companies House.
- 4.3.9 Title information was verified using 'land interest questionnaires.' These were issued to all land interests within the Order limits and asked landowners to confirm the information taken from the Land Registry and to obtain any additional information from those not identified through the Land Registry.
- 4.3.10 A 'farmer's questionnaire' was also issued to determine the current use of the land. This questionnaire sought information relating to business name, land tenure, farming enterprise and type of cropping.
- 4.3.11 Where land interest questionnaires were not returned, direct contact was sought with the owner or occupier of the property. Due to ongoing public health restrictions, this included phone calls, an email and a follow-up site visit. A minimum of three site visits were carried out in order to make direct contact with the owner or occupier if their Land Registry address was within close proximity to the Order limits. If a response was received on the first or second visit a follow-up was not pursued.
- 4.3.12 The site visits were carried out for the purpose of the following: to help a land interest complete the land interest questionnaire, to chase up any land interest questionnaires that had not been returned (this was repeated three times unless access was refused or a land interest questionnaire was subsequently returned), to understand the land from a physical perspective.
- 4.3.13 Where land interests could not be identified, site notices were erected on the land to request ownership information and to signpost to contact details for the project team. These were left in place and monitored for a minimum of six weeks unless the land interest was confirmed. A total of 23 site notices were erected, which resulted in a further 20 land interests being identified.
- 4.3.14 Category 2 were identified via the same process: title information, requests for information, site visits, and collaboration with the wider project team to identify any interests not identified through the land referencing process.
- 4.3.15 As part of the diligent inquiry process, Land Registry data was refreshed every six months to identify new interests. Where new interests were found, land interest questionnaires were issued and the process outlined above was followed to verify their details.
- 4.3.16 The diligent inquiry process set out above was repeated by the Applicant as the Scheme design evolved. The Applicant has engaged with these interests through consultations on changes to the Scheme boundary, as described in 4.7.3 and Chapter 5. A full list of such interests is provided in **Appendix E-2**.

- 4.3.17 Through diligent inquiry, the Applicant considers that there are no persons who might be entitled to make a relevant claim as a Category 3 interest pursuant to Part 1 of the Land Compensation Act 1973. Part 1 of the Land Compensation Act 1973 relates to people who live outside of the Order limits but whose property may be sufficiently close to be depreciated in value due to noise, vibration, smells, smoke or light emissions caused by the use of the Scheme once it is in operation.
- 4.3.18 The Applicant considers that there are no interests that have a relevant claim under Part 1 of the Land Compensation Act 197 in relation to each of the following factors:
- a. Noise – in light of the results of a noise assessment carried out as part of the Environmental Statement for the Application, there are no Category 3 land interests as part of the proposed Scheme. Further information on this is provided in Chapter 11 of the Environmental Statement: Noise and Vibration [EN010106/APP/6.1];
 - b. Vibration – in light of the results of an assessment of vibration carried out as part of the Environmental Statement for the Application, there are no Category 3 land interests as part of the proposed Scheme. Further information on this is provided in Chapter 11 of the Environmental Statement: Noise and Vibration [EN010106/APP/6.1];
 - c. Fumes – in light of the results of an assessment of the proposed Scheme's impact on air quality and the emission of fumes as a result of the proposed Scheme, there are no Category 3 land interests as part of the proposed Scheme. Further information on this is provided in Chapter 14 of the Environmental Statement: Air Quality [EN010106/APP/6.1];
 - d. Smoke – in light of the results of an assessment of the proposed Scheme's impact on air quality and the emission of smoke as a result of the proposed Scheme, there are no Category 3 land interests as part of the proposed Scheme. Further information on this is provided in Chapter 14 of the Environmental Statement: Air Quality [EN010106/APP/6.1]; and,
 - e. Light emissions – in light of the results of an assessment of the proposed Scheme's impact on visual amenity, there are no Category 3 land interests as part of the proposed Scheme. Further information on this is provided in Chapter 10 of the Environmental Statement: Landscape and Visual Amenity [EN010106/APP/6.1].
- 4.3.19 All relevant interests with the potential to make a claim under Section 10 (s10) of the Compulsory Purchase Act 1965 because they are in benefit of a restrictive right or covenant over land within the Order limits, have been included within the Book of Reference [EN010106/APP/4.3] as Category 2 and Category 3 persons.
- 4.3.20 All relevant interests with the potential to make a claim under Section 152(3) of the PA 2008 because they are in benefit of a restrictive right or covenant over land within the Order limits, have been included within the Book of Reference [EN010106/APP/4.3] as Category 2 and Category 3 persons.

- 4.3.21 A list of land interests consulted (noting their interest in the land) during the statutory consultation phase is provided in **Appendix E-2**. Following statutory consultation, some land interests have been taken out of the Order limits and some have been brought into the Order limits. Where persons have been removed or brought into the Order limits, that is also described in **Appendix E-2**.

Consultation under s42 of the PA 2008

- 4.3.22 The Applicant wrote formally to all consultees identified under s42 of the PA 2008 to notify them of the consultation.
- 4.3.23 The Applicant wrote to consultees under s42(1)(a) and s42(1)(b) of the PA 2008 on 16 September 2020, setting out the background to the Scheme, the Applicant's intention to submit a DCO application, the fact that the Applicant had identified them as a consultee under s42(1)(a) or s42(1)(b) of the PA 2008, the documents being provided as part of the consultation, and how to respond to the consultation. These letters were sent to recipients by recorded delivery. Where these were not received, a follow up email was issued giving the recipient at least 28 full days to respond. In each case, the Applicant had email contacts for the consultee. Each consultee subsequently acknowledged receipt or responded to the consultation.
- 4.3.24 The Applicant enclosed with the letter a copy of a consultation booklet, which provided more information about the Scheme and included a plan showing the proposed Order limits of the Scheme and a copy of a consultation questionnaire. The Applicant also enclosed a notice of the proposed application which was publicised in accordance with s48 of the PA 2008 and the requirements set out in Regulation 4 of the APFP Regulations.
- 4.3.25 The letter also made these documents, alongside the PEI Report and its non-technical summary, available electronically on the Scheme website. This information was provided in an electronic form to minimise the provision of paper or electronic documentation which would have been physically handled during the COVID-19 pandemic.
- 4.3.26 The Applicant wrote to consultees under s42(1)(d) of the PA 2008 on 16 September 2020 setting out the background to the Scheme, the Applicant's intention to submit a DCO application, the fact that the Applicant had identified them as a consultee under s42(1)(d) of the PA 2008, the documents being provided as part of the consultation, and how to respond to the consultation. These letters were sent to recipients by recorded delivery.
- 4.3.27 Receipt of the letters was confirmed by checking delivery records. Where delivery by post was not successful, the Applicant delivered consultation letters to consultees under s42(1)(d) of the PA 2008 by hand. In total, letters to six consultees required delivery by hand. In addition, letters to two consultees were reissued to new addresses when the first were returned to sender.
- 4.3.28 28 new land interests were identified during the statutory consultation period through ongoing diligent inquiry. The Applicant wrote to these

consultees by recorded delivery following the process set out in and provided each with a minimum of 28 days to respond to the consultation. Details of these land interests are included in **Appendix E-2**.

- 4.3.29 All letters were received except letters issued to two consultees. Following six failed attempts to secure delivery, the Applicant notified the consultees by erecting a notice at the closest possible location to the consultee's land. The notice notified the consultee that the Applicant had identified them as a consultee under s42(1)(d) of the PA 2008 and informed them of how to respond to the consultation. The notice also contained copies of the documents provided to s42(1)(d) consultees. The notice was in place from 29 October 2020 to 2 February 2021, meaning that the consultee was given more than 28 days to respond.
- 4.3.30 The Applicant enclosed with the letter a copy of a consultation booklet, which provided more information about the Scheme and included a plan showing the proposed red line boundary of the Scheme and a copy of a consultation questionnaire. The letter also made these documents, alongside the PEI Report and its non-technical summary, available electronically on the Scheme website. This information was provided in an electronic form to minimise the provision of paper or electronic documentation which would have been physically handled during the COVID-19 pandemic.
- 4.3.31 Copies of the letters sent to consultees under s42 of the PA 2008 are included in **Appendix F-1**. Consultation materials sent to consultees under s42 of the PA 2008 are available to view in **Appendixes G-2 to G-4**. The notice under s48 of PA 2008 is included in **Appendix K-1**.

Further engagement with consultees under s42

- 4.3.32 The Applicant also had further engagement with a number of consultees under s42 of the PA 2008 during the consultation period.
- 4.3.33 **Table 4-4** summarises further engagement with consultees under s42 of the PA 2008 during the consultation period.

Table 4-4 Further engagement with consultees under s42 of the PA 2008 during the consultation period

Stakeholders engaged:	Date	Summary of engagement
All Cambridgeshire county councillors, all Suffolk county councillors, all East Cambridgeshire district councillors, all West Suffolk district councillors and parish councils in the area of the Scheme	22 September 2020	Shared a briefing pack detailing the consultation, how people can take part, the consultation booklet, SoCC summary poster, and feedback form. The correspondence invited further engagement with the consultation.

Stakeholders engaged:	Date	Summary of engagement
Openreach	24 September 2020	Consultee requested a single plan showing the site and location of relevant telephone exchanges. Enquiries about hot zones were raised and we will continue to engage with Openreach on this matter.
Burwell Parish Council, Exning Parish Council, Fordham Parish Council, Snailwell Parish Council, Chippenham Parish Council, Freckenham Parish Council, Worlington Parish Council, Kennett Parish Council, Red Lodge Parish Council, Barton Mills Parish Council, Isleham Parish Council and West Row Parish Council	7 October 2020	<p>The Applicant wrote to the parish councils to offer hard copies of the core chapters and non-technical summary of the PEI Report, subject to the parish councils agreeing to share it in a manner that would protect the safety of those viewing it during the COVID-19 pandemic. The offer was made on a voluntary basis and was designed to supplement the consultation methods set out in the SoCC.</p> <p>Parish councils that accepted the offer were issued with a letter requesting they confirm that if the documents were to be shared, they would be shared in a COVID-secure manner.</p> <p>Hard copies were dispatched to the following parish councils on the following dates:</p> <ul style="list-style-type: none"> a) Chippenham Parish Council – 15 October 2020; b) Barton Mills Parish Council – 19 October 2020; c) Worlington Parish Council – 19 October 2020; d) Freckenham Parish Council – 21 October 2020; e) Exning Parish Council – 6 November 2020; f) Red Lodge Parish Council – 17 November 2020; and, g) Fordham Parish Council – 30 November 2020.
Freckenham Parish Council	9 October 2020	Consultee issued a letter expressing concerns about the statutory consultation arrangements. A response to the parish council was issued on 15 October 2020.
Suffolk County Council	20 October 2020	Consultee requested a meeting with county archaeologists to discuss archaeological trenching locations.
Isleham Parish Council	20 October 2020	Consultee requested unredacted survey of Appendix 8H of the PEI Report. Given privacy concerns raised with the redacted information, we were not able to

Stakeholders engaged:	Date	Summary of engagement
		provide an unredacted version of the document.
Natural England	20 October 2020	Consultee requested clarification as consultation letter and materials did not seem to have been received. The documents were received at the consultee's mailing address at the beginning of the consultation but did not appear to have been forwarded. Copies of the materials were reissued to the consultee and contact databases updated for future reference.
Isleham Parish Council	22 October 2020	Consultee requested response to earlier correspondence regarding non-statutory consultation. A response was provided.
Chippenham Parish Council	26 October 2020	Consultee requested a banner to promote the consultation. A banner was issued to the parish council.
Worlington Parish Council	26 October 2020	Consultee requested a banner to promote the consultation. A banner was issued to the parish council.
Church Commissioners	26 October 2020	Consultee requested correspondence to be issued electronically due to remote working. These documents were subsequently provided.
Isleham Parish Council	27 October 2020	Consultee requested a banner to promote the consultation. A banner was issued to the parish council.
Freckenham Parish Council	30 October 2020	A meeting to discuss concerns raised by Freckenham Parish Council about the consultation process in the context of the COVID-19 pandemic. The Applicant set out its response to the parish council's points, restated the offer of a hard copy of the core chapters and non-technical summary of the PEI Report, and agreed to provide a banner promoting the consultation.
Secretary of State for Transport	4 November 2020	Consultee requested a plan of affected land to ensure appropriate forwarding of letters. A plan and digital copy of the letter were provided to the consultee.
Highways England	5 November 2020	Consultee requested a copy of the Transport Note referenced in the EIA Scoping submission. This document was provided to the consultee by the Applicant.

Stakeholders engaged:	Date	Summary of engagement
Environment Agency	6 November 2020	Consultee requested details of whether there are fluids in any of the cables. Details of this were provided by the Applicant.
Red Lodge Parish Council	10 November 2020	Consultee requested a banner to promote the consultation. A banner was issued to the parish council.
Historic England	13 November 2020	Consultee requested that future correspondence is addressed to East of England Regional Team. The Applicant updated its contact database.
The Crown Estate	24 November 2020	Consultee informed the Applicant that the Crown Estate did not consider itself affected by the Scheme and requested that no further correspondence be addressed to them.

4.4 Section 46 (notifying the Inspectorate)

- 4.4.1 Pursuant to s46 of the PA 2008, the Applicant must send the Planning Inspectorate (on behalf of the Secretary of State) the s42 consultation documents before commencing the s42 consultation. The Applicant wrote to the Inspectorate on 16 September 2020 to provide the documents listed in 4.3.23 – 4.3.25.
- 4.4.2 Alongside these documents, the Applicant provided a covering letter which set out the background to the Scheme, the Applicant's intention to submit a DCO application, details of the documents included and the fact they would be sent to consultees under s42 of the PA 2008, and a summary of the consultation process.
- 4.4.3 The Applicant received an acknowledgement of the receipt of its notification under s46 of the PA 2008 from the Planning Inspectorate on 6 October 2020.
- 4.4.4 A copy of the letter sent to the Planning Inspectorate is provided in **Appendix G-1**. The accompanying consultation booklet and consultation questionnaire are included in **Appendices G-2 and G-4**. The notice under s48 of PA 2008 is included in **Appendix K-1**.

4.5 Section 47 (local community consultation)

- 4.5.1 The Applicant consulted with the local community in accordance with the SoCC provided in **Appendix D-2**, as prescribed by s47(7) of the PA 2008.

Definition of consultees

- 4.5.2 For the purposes of community consultation, the Applicant defined three zones of consultation. These are described in **Table 4-5**.

Table 4-5 Zones of consultation

Zone	Parameters
Zone 1	Any person or group likely to have a direct interest in the proposed Sunnica Energy Farm, as well as their political representatives (at a parish, district, county, and Parliamentary level) as defined in Figure 4-2 . This comprised a buffer zone of at least 1 mile from the boundary of the Scheme, extended in places to reflect feedback from the non-statutory consultation and the EIA process.
Zone 2	People living and working in the host local authorities of West Suffolk Council, East Cambridgeshire District Council, Suffolk County Council, and Cambridgeshire County Council outside of consultation zone 1. Figure 4-3 shows the location of this area.
Zone 3	<p>Neighbouring districts within the administrative areas of:</p> <ul style="list-style-type: none"> a. Borough Council of King's Lynn and West Norfolk; b. Breckland Council; c. Mid Suffolk District Council; d. Babergh District Council; e. Braintree District Council; f. South Cambridgeshire District Council; g. Huntingdonshire District Council; and, h. Fenland District Council. <p>Neighbouring counties and unitary authorities within the administrative areas of:</p> <ul style="list-style-type: none"> a. Norfolk County Council; b. Essex County Council; c. Hertfordshire County Council; d. Central Bedfordshire Council; e. Bedford Borough Council; f. Northamptonshire County Council; g. Peterborough City Council; and, h. Lincolnshire County Council. <p>These authorities are included in Figure 4-1.</p>

- 4.5.3 In addition, the Applicant consulted a range of relevant community organisations and other relevant bodies in the vicinity of the Scheme. These were identified through a combination of desk research, engagement with local authorities and other stakeholders, and the non-statutory consultation. These include some statutory undertakers that, while defined as such in

Schedule 1 to the APPF Regulations and table 2 of the Annex to PINS Advice Note Three, were deemed not to have met the circumstances of Column 2 in Schedule 1 of the APFP Regulations given the location of, and proposals comprising, the Scheme. A list of these organisations is included in **Appendix H-1**.

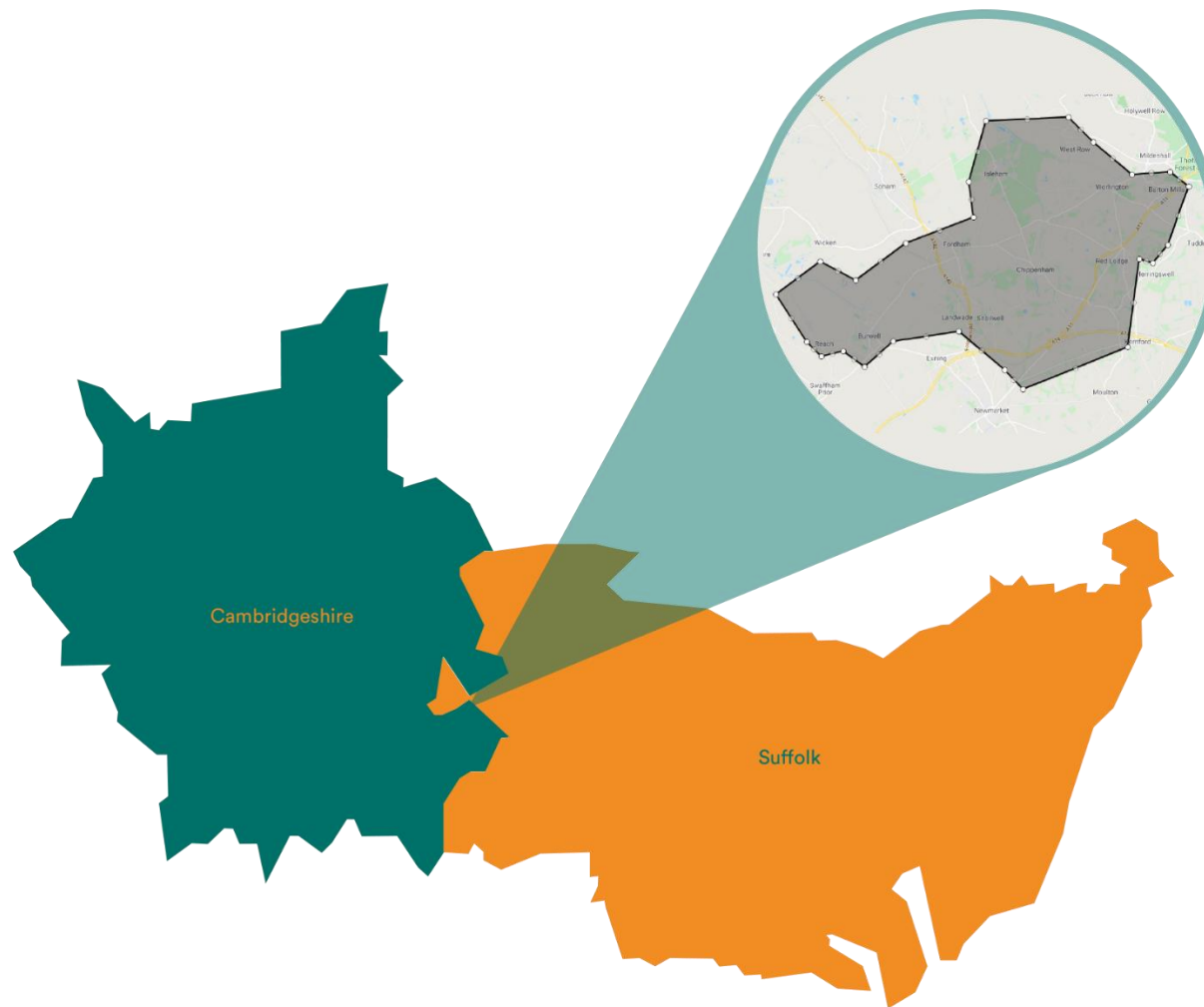


Figure 4-2 Area of consultation zone 1 shown in extract (source: Geolist)

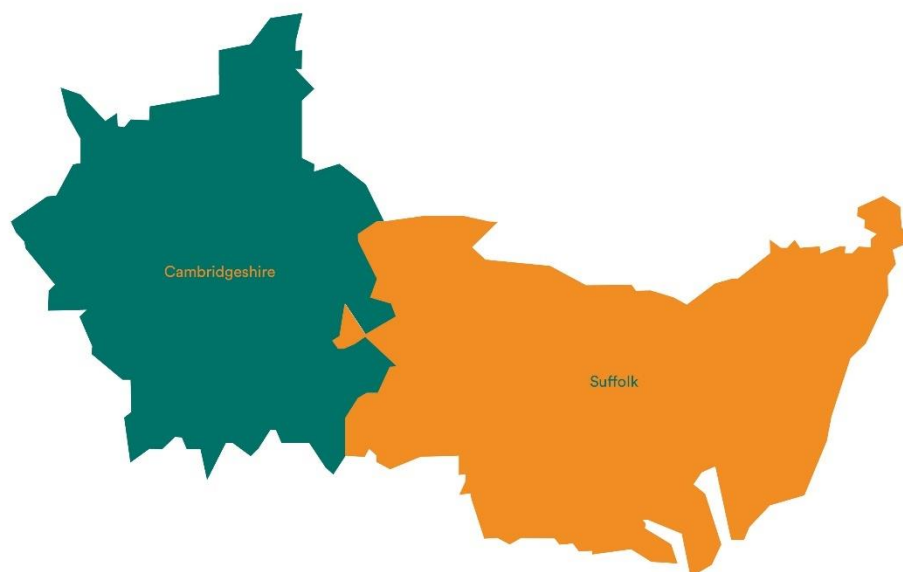


Figure 4-3 Area of consultation zone 2

Consultation activity

4.5.4 The Applicant used a range of techniques to consult the community. These were designed to allow people with different needs across the community to take part in the consultation in a way that is convenient to them whilst complying with Government guidance on COVID-19. These are set out in **Table 4-6**.

Table 4-6 Community consultation publicity and activity

Zone	Consultation publicity	Consultation activity
1	<p>The Applicant:</p> <ul style="list-style-type: none"> a. Wrote to all 10,779 addresses within consultation zone 1 at the start of the consultation period; b. Wrote to elected representatives, parish councils, and community groups within the zone with details of the consultation at the start of the consultation period. This included a consultation information pack designed to support stakeholders promoting consultation through their own existing communication channels 	<p>The Applicant:</p> <ul style="list-style-type: none"> a. Sent a copy of a consultation booklet providing a non-technical overview of the proposed Sunnica Energy Farm, the EIA process, the consultation and planning process, how to take part in the consultation, and proposed next steps to all addresses in consultation zone 1, alongside a consultation questionnaire and pre-addressed Freepost envelope. This ensured that people living in the

Zone	Consultation publicity	Consultation activity
	<p>such as social media feeds;</p> <p>c. Advertised the consultation in the following newspapers circulating in the consultation zone: the Newmarket Journal (1 October 2020, 5 November 2020, 11 November 2020), the Cambridge News (24 September 2020, 1 November 2020, 5 November 2020), Bury Free Press (25 September 2020, 6 November 2020, 13 November 2020), the Ely Standard (1 October 2020, 5 November 2020, 12 November 2020) and the East Anglian Daily Times (23 September 2020, 5 November 2020, 12 November 2020);</p> <p>d. Publicised the consultation via regional and local broadcasters including interviews on BBC Radio Cambridgeshire (10 November 2020), BBC Radio Suffolk (16 October 2020, 5 November 2020) and ITV Anglia (23 November 2020);</p> <p>e. Advertised the consultation on social media through 12 promoted posts on Facebook, reaching 8,095 people per post on average; and,</p> <p>f. Published details of the consultation online on the Scheme website.</p>	<p>consultation zone had direct access to the core consultation information and could respond to the consultation;</p> <p>b. Hosted a virtual public exhibition, available on the Scheme website;</p> <p>c. Hosted a series of webinars offering an opportunity to ask questions about the Scheme. Further details of the subjects and timings of the webinars are included in Table 4-7;</p> <p>d. Invited residents of consultation zone 1 to book an individual appointment to discuss the proposals by telephone, providing an opportunity for those without access to the internet to ask questions. Details of how to book an appointment were included in the consultation booklet and consultation advertising. Three appointments were requested and held during the consultation period;</p> <p>e. Briefed elected members from West Suffolk Council and Suffolk County Council on 17 September 2020 and elected members from East Cambridgeshire District Council and West Suffolk Council on 18 September 2020;</p> <p>f. Briefed representatives from Burwell Parish Council, Chippenham Parish Council, Fordham Parish Council, Freckenham Parish Council, Herringswell Parish Council, Isleham Parish Council, Kennett Parish Council, Mildenhall Town Council,</p>

Zone	Consultation publicity	Consultation activity
		<p>Moulton Parish Council, Red Lodge Parish Council, Snailwell Parish Council, West Row Parish Council and Worlington Parish Council on 21 September 2020;</p> <p>g. Contacted community and voluntary organisations within consultation zone 1 to offer direct engagement and share detailed of the consultation. These organisations are listed in Appendix H-1;</p> <p>h. Published all consultation materials on the Scheme website; and</p> <p>i. Invited enquiries and responses online through the Scheme website, by freephone (0808 168 7925), freepost (Sunnica Consultation, FREEPOST reference RTRB-LUUJ-AGBY, c/o Newgate Communications, Sky Light City Tower, 50 Basinghall Street, London, EC2V 5DE) or email. These details were included in all consultation materials. This provided a variety of means for consultees to respond in a way convenient to them.</p>
2	<p>The Applicant:</p> <p>a. Wrote to all district and county councillors at West Suffolk Council, East Cambridgeshire District Council, Suffolk County Council and Cambridgeshire County Council at the start of the consultation period;</p> <p>b. Wrote to all parish councils within the consultation zone at the start of the consultation period, excluding those identified in</p>	<p>The Applicant:</p> <p>a. Hosted a virtual public exhibition, available on the Scheme website;</p> <p>b. Hosted a series of webinars offering an opportunity to ask questions about the Scheme. Further details of the subjects and timings of the webinars are included in Table 4-7;</p> <p>c. Briefed elected members from West Suffolk Council and Suffolk County Council on 17 September</p>

Zone	Consultation publicity	Consultation activity
	<p>section 4.8;</p> <p>c. Shared 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 by email at the start of the consultation period;</p> <p>d. Advertised the consultation in the following newspapers circulating in the consultation zone: the Newmarket Journal (1 October 2020, 5 November 2020, 11 November 2020), the Cambridge News (24 September 2020, 1 November 2020, 5 November 2020), Bury Free Press (25 September 2020, 6 November 2020, 13 November 2020), the Ely Standard (1 October 2020, 5 November 2020, 12 November 2020) and the East Anglian Daily Times (23 September 2020, 5 November 2020, 12 November 2020);</p> <p>e. Publicised the consultation via regional and local broadcasters including interviews on BBC Radio Cambridgeshire (10 November 2020), BBC Radio Suffolk (16 October 2020, 5 November 2020), and ITV Anglia (23 November 2020);</p> <p>f. Advertised the consultation on social media through 12 promoted posts on Facebook, reaching 8,095 people per post on average; and,</p> <p>g. Published details of the consultation online on the Scheme website.</p>	<p>2020 and elected members from East Cambridgeshire District Council and West Suffolk Council on 18 September 2020;</p> <p>d. Published all consultation materials on the Scheme website; and,</p> <p>e. Invited enquiries and responses online through the Scheme website, by freephone (0808 168 7925), freepost (Sunnica Consultation, FREEPOST reference RTRB-LUJJ-AGBY, c/o Newgate Communications, Sky Light City Tower, 50 Basinghall Street, London, EC2V 5DE) or email. These details were included in all consultation materials. This provided a variety of means for consultees to respond in a way convenient to them.</p>

Zone	Consultation publicity	Consultation activity
3	<p>The Applicant:</p> <ol style="list-style-type: none"> Wrote to the Leader and Chief Executive of local authorities within the zone at the start of the consultation period; Advertised the consultation in the following newspapers circulating in the consultation zone: the Cambridge News (24 September 2020, 1 November 2020, 5 November 2020), the East Anglian Daily Times (23 September 2020, 5 November 2020, 12 November 2020) and Eastern Daily Press (23 September 2020); Publicised the consultation via regional and local broadcasters including interviews on BBC Radio Cambridgeshire (10 November 2020), BBC Radio Suffolk (16 October 2020, 5 November 2020) and ITV Anglia (23 November 2020); Advertised the consultation on social media through 12 promoted posts on Facebook, reaching 8,095 people per post on average; and, Published details of the consultation online from the Scheme website. 	<p>The Applicant:</p> <ol style="list-style-type: none"> Hosted a virtual public exhibition, available on the Scheme website; Hosted a series of webinars offering an opportunity to ask questions about the Scheme. Further details of the subjects and timings of the webinars are included in Table 4-7; Published all consultation materials online from the Scheme website; and Invited enquiries and responses online through the Scheme website, by freephone (0808 168 7925), freepost (Sunnica Consultation, FREEPOST reference RTRB-LUUI-AGBY, c/o Newgate Communications, Sky Light City Tower, 50 Basinghall Street, London, EC2V 5DE) or email. These details were included in all consultation materials. This provided a variety of means for consultees to respond in a way convenient to them.

4.5.5 **Table 4-7** sets out details of webinars held during the consultation period, including dates and topics. A recording of a webinar on each topic was made available on the Scheme website and can be supplied directly by request to the Applicant:

Table 4-7 Webinars held as part of the consultation

Topic	Time and date	Public attendees
Introducing the consultation	18:00 on 1 October 2020	12
Sunnica East Sites A and	14:00 on 3 October 2020	21

Topic	Time and date	Public attendees
B		
Sunnica West Sites A and B	18:00 on 8 October 2020	14
The grid connection	14:00 on 10 October 2020	13
Environmental impact assessments	18:00 on 15 October 2020	18
Construction, operations, and decommissioning	14:00 on 17 October 2020	12
Introducing the consultation (repeat)	14:00 on 24 October 2020	2
Sunnica East Sites A and B (repeat)	18:00 on 29 October 2020	7
Sunnica West Sites A and B (repeat)	14:00 on 31 October 2020	10
The grid connection (repeat)	18:00 on 5 November 2020	5
Environmental impact assessments (repeat)	14:00 on 7 November 2020	2
Construction, operations and decommissioning (repeat)	18:00 on 12 November 2020	5
Q&A session	19:00 on 18 November 2020	32
Q&A session	19:00 on 25 November 2020	44
Q&A session	19:00 on 2 December 2020	28

4.5.6 The Applicant scheduled webinars at different times of the week and repeated each webinar during the consultation period to account for different consultees' availabilities.

4.5.7 The webinars which took place between 1 October 2020 and 12 November 2020 were scheduled from the start of the consultation period. Details of these webinars were included in the SoCC, the consultation booklet, and on the Scheme website. Each of these webinars included a presentation by the

Applicant on a different aspect of the Scheme, followed by a question and answer session.

- 4.5.8 The Applicant scheduled the webinars which took place on 18 November 2020, 25 November 2020, and 2 December 2020 after the start of the consultation period. These were additional webinars to allow a further opportunity for people living in the local community to ask questions about the Scheme and took the format of a question and answer session. Details of how the Applicant publicised these additional webinars are included in section 4.7.
- 4.5.9 Where questions were raised that the Applicant was not able to answer in full during a webinar, additional information was made available online alongside the recording, on the Scheme website. The Applicant set out that it would take this approach during the webinars.
- 4.5.10 There was a technical problem with the webinar which took place at 14:00 on 3 October 2020 which meant that the recording was damaged from 1:19:00 onwards. The Applicant therefore provided a written summary on the Scheme website of questions and answers discussed during this part of the webinar alongside the recording.

Consultation materials

- 4.5.11 The Applicant made the following materials available as part of consultation with the local community:
- a. A consultation booklet providing a non-technical overview of the proposed Sunnica Energy Farm, the EIA process, the consultation and planning process, and proposed next steps;
 - b. A virtual exhibition setting out information about the Scheme and how to take part in the consultation, available on the Scheme website;
 - c. Presentations to be given as part of webinars;
 - d. The PEI Report, accompanied by a non-technical summary; and,
 - e. A consultation questionnaire designed to collect responses to the consultation.
- 4.5.12 Copies of the consultation booklet, alongside the consultation questionnaire and a pre-addressed Freepost envelope, were sent to all addresses within consultation zone 1. This was to ensure that people living in consultation zone 1 had direct access to the core consultation information and could respond in a convenient manner.
- 4.5.13 In line with the Government's confirmation that placing materials on a website maintained by or on behalf of the Applicant meets the requirement to place information on public deposit in the Infrastructure Planning (Publication and Notification of Applications etc.) (Coronavirus) (Amendment) Regulations 2020 (the 2020 Regulations), all consultation materials were made available online on the Scheme website for the duration of the consultation period. We confirm that the Scheme website is a website maintained by or on behalf of the Applicant. This was reflected in the SoCC.

- 4.5.14 In addition, the Applicant identified opportunities to make hard copies of consultation materials available on deposit during the consultation period above and beyond the SoCC requirements and the commitment to make materials available online at the Scheme website.
- 4.5.15 The Applicant therefore made a hard copy of the core chapters of the PEI Report and its non-technical summary available to Freckenham Parish Council, Chippenham Parish Council, Exning Parish Council, Fordham Parish Council, Red Lodge Parish Council, Worlington Parish Council, and Barton Mills Parish Council for residents to access.
- 4.5.16 The Applicant wrote to all addresses in consultation zone 1 advising residents to contact these parish councils if they wished to access a hard copy of the PEI Report. Section 4.7 provides more detail of the way in which The Applicant publicised additional consultation activity.
- 4.5.17 Copies of the consultation booklet and boards from the virtual exhibition, as well as screenshots from the virtual exhibition, are available in **Appendix G-4**. A copy of the consultation questionnaire is included in **Appendix G-2**. The presentations from the webinars can be viewed in the recordings referenced in 4.5.5. An electronic version of the PEI Report can be viewed on the Scheme website or by contacting the Applicant.

Collection of responses

- 4.5.18 To capture participants' feedback, the Applicant produced a consultation questionnaire inviting comments on the different elements of the Scheme. The questionnaire was made available by direct mail to people living in consultation zone 1, online on the Scheme website and on request.
- 4.5.19 The questionnaire asked the following questions:
- a. 1. Do you have any comments on our proposals for:
 - a) Sunnica East?
 - b) Sunnica West?
 - b. 2. Do you have any comments on our proposals for connecting to the national electricity transmission system, including laying cables underground and extending Burwell National Grid Substation?
 - c. 3. Do you have any comments about the potential environmental impacts and our proposed mitigation during:
 - a) the construction of Sunnica Energy Farm?
 - b) the operational lifetime of Sunnica Energy Farm?
 - c) the decommissioning of Sunnica Energy Farm?
 - d. 4. Do you have any further comments?
- 4.5.20 Consultees were able to respond by completing a questionnaire online on the Scheme website or returning a completed questionnaire by email or by email or to Sunnica Consultation, FREEPOST reference RTRB-LUJJ-AGBY, c/o Newgate Communications, Sky Light City Tower, 50 Basinghall Street, London, EC2V 5DE.

4.5.21 The Applicant also accepted written responses by email and by letter to Sunnica Consultation, FREEPOST reference RTRB-LUJJ-AGBY, c/o Newgate Communications, Sky Light City Tower, 50 Basinghall Street, London, EC2V 5DE.

Compliance with the SoCC

4.5.22 Details of the way in which the Applicant complied with commitments made in the SoCC are set out in **Table 4-8**.

Table 4-8 Compliance with the SoCC

Page	Section	Commitment	Compliance
9	Consulting the community - What will be consulted on?	Seek views on proposed Sunnica Energy Farm, short and long term impacts including during construction, operations, and decommissioning, and the PEI Report	The Applicant included questions on each of these topics in the consultation questionnaire, as set out in 4.5.19.
10	Consulting the community - environmental impacts	Publish the PEI Report as part of the consultation.	The Applicant published the PEI Report on the Scheme website.
10	Consulting the community - Who will we consult?	We will consult widely in accordance with this SoCC and encourage participation in the consultation from any person or group who is interested in the proposed Sunnica Energy Farm. Please see Table 2 below for the geographic areas within which we will consult.	The Applicant consulted in the areas set out in Table 2 of the SoCC in the manner set out in Table 4-6 of this report.
10	Consulting the community - Who will we consult?	Consultation zone 1 to comprise a buffer zone of at least 1 mile from the boundary of the proposed Sunnica Energy Farm, extended in places to reflect feedback from the non-statutory consultation and the EIA process.	The Applicant consulted within this zone as set out in Table 4-5 of this report.
15	Consulting the community - Who will we consult?	We will also consult and continue our engagement with a range of statutory consultees as set out by Section 42 and Section 48 of the Planning Act 2008 and additional	Details of organisations consulted by the Applicant are included in Appendix H-1 .

Page	Section	Commitment	Compliance
		<p>organisations that we recognise to have an interest in the proposed Sunnica Energy Farm. These groups include:</p> <ul style="list-style-type: none"> a. Economic interest groups and organisations such as local enterprise partnerships (LEPs), chambers of commerce and representatives of the horse racing industry; b. Heritage consultees including Historic England and the National Trust; c. Environmental consultees including Natural England and the Environment Agency; and, d. Conservation groups such as the RSPB and Suffolk Wildlife Trust. 	
14-5	Consulting the community - table 3	Writing to all addresses within consultation zone 1	The Applicant sent a copy of the consultation booklet alongside a Freepost envelope and a copy of the consultation questionnaire at the start of the consultation period.
14-5	Consulting the community - table 3	Writing to elected representatives, parish councils and community groups within consultation zone 1 with details of the consultation	The Applicant wrote to elected representatives, parish councils and community groups within the zone with details of the consultation at the start of the consultation period. This included a consultation information pack sent by email designed to support stakeholders promoting consultation through their own existing communication channels

Page	Section	Commitment	Compliance
			such as social media feeds. This is included with consultation materials in Appendix I-1 .
14-5	Consulting the community - table 3	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 consultation zone 1.	The Applicant wrote to elected representatives and parish councils within the zone with details of the consultation at the start of the consultation period. Community groups were contacted with the information pack during the consultation. This included a consultation information pack sent by email designed to support stakeholders promoting consultation through their own existing communication channels such as social media feeds. This is included with consultation materials in Appendix I-1 .
14-5	Consulting the community - table 3	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.	The Applicant advertised the consultation in the following newspapers circulating in the consultation zone: the Newmarket Journal (1 October 2020, 5 November 2020, 11 November 2020), the Cambridge News (24 September 2020, 1 November 2020, 5 November 2020), Bury Free Press (25 September 2020, 6 November 2020, 13 November 2020), the Ely Standard (1 October 2020, 5 November 2020, 12 November 2020) and the East Anglian Daily Times (23 September 2020, 5 November 2020,

Page	Section	Commitment	Compliance
			12 November 2020). Copies are included in Appendix G-3 .
14-5	Consulting the community - table 3	Publicising the consultation via the following broadcasters: BBC Radio Cambridgeshire, BBC Suffolk, BBC Look East	The Applicant publicised the consultation in this zone via regional and local broadcasters including interviews on BBC Radio Cambridgeshire (10 November 2020), BBC Radio Suffolk (16 October 2020, 5 November 2020) and ITV Anglia (23 November 2020).
14-5	Consulting the community - table 3	Advertising the consultation on social media	The Applicant advertised the consultation on social media through 12 promoted posts on Facebook, reaching 8,095 people per post on average. Copies are included in Appendix G-3 .
14-5	Consulting the community - table 3	Publishing details of the consultation online on the Scheme website.	The Applicant published details of the consultation on the Scheme website.
14-5	Consulting the community - table 3	Sending a copy of a consultation booklet providing a non-technical overview of the proposed Sunnica Energy Farm, the EIA process, the consultation and planning process, how to take part in the consultation, and proposed next steps to all addresses in consultation zone 1.	The Applicant sent a copy of the consultation booklet alongside a Freepost envelope and a copy of the consultation questionnaire at the start of the consultation period.
14-5	Consulting the community - table 3	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	The Applicant invited enquiries and responses online through the Scheme website, by freephone (0808 168 7925), freepost (Sunnica Consultation, FREEPOST reference

Page	Section	Commitment	Compliance
		to them.	RTRB-LUJJ-AGBY, c/o Newgate Communications, Sky Light City Tower, 50 Basinghall Street, London, EC2V 5DE) or email. These details were included in all consultation materials. This provided a variety of means for consultees to respond in a way convenient to them.
14-5	Consulting the community - table 3	Hosting a virtual public exhibition on the consultation website.	The Applicant hosted a virtual public exhibition available from the Scheme website.
14-5	Consulting the community - table 3	Hosting webinars which will include a presentation regarding the proposals and an opportunity to ask questions.	Details of webinars held as part of the consultation are included in Table 4-7 .
14-5	Consulting the community - table 3	Inviting elected representatives to take part in briefings through a webinar.	The Applicant briefed elected members from West Suffolk Council and Suffolk County Council on 17 September 2020 and elected members from East Cambridgeshire District Council and West Suffolk Council on 18 September 2020. It also briefed representatives from Burwell Parish Council, Chippenham Parish Council, Fordham Parish Council, Freckenham Parish Council, Herringswell Parish Council, Isleham Parish Council, Kennett Parish Council, Mildenhall Town Council, Moulton Parish Council, Red Lodge Parish Council, Snailwell Parish Council, West Row Parish Council and Worlington Parish Council

Page	Section	Commitment	Compliance
			on 21 September 2020.
14-5	Consulting the community - table 3	Inviting residents of consultation zone 1 to book an individual appointment to discuss the proposals by telephone.	The Applicant invited residents of consultation zone 1 to book an individual appointment to discuss the Scheme by telephone, providing an opportunity for those without access to the internet to ask questions. Details of how to book an appointment were included in the consultation booklet and consultation advertising.
14-5	Consulting the community - table 3	Contacting community and voluntary organisations within consultation zone 1 to offer direct engagement.	The Applicant contacted community and voluntary organisations, and other relevant bodies, within consultation zone 1 to offer direct engagement and share detailed of the consultation. These organisations are listed in Appendix H-1 .
14-5	Consulting the community - table 3	Publication of consultation information online at the consultation website.	The Applicant published all consultation materials online on the Scheme website.
14-5	Consulting the community - table 3	Compliance with the most up to date legal requirements in relation to public deposits.	In line with the Government's confirmation that placing materials online meets the requirement to place information on public deposit in the Infrastructure Planning (Publication and Notification of Applications etc.) (Coronavirus) (Amendment) Regulations 2020 (the 2020 Regulations), all consultation materials were

Page	Section	Commitment	Compliance
			made available online on the Scheme website for the duration of the consultation period.
14-5	Consulting the community - table 3	Writing to all district and county councillors at West Suffolk Council, East Cambridgeshire District Council, Suffolk County Council and Cambridgeshire County Council	The Applicant wrote to all district and county councillors at West Suffolk Council, East Cambridgeshire District Council, Suffolk County Council and Cambridgeshire County Council at the start of the consultation period.
14-5	Consulting the community - table 3	Writing to all parish councils in consultation zone 2	Details of compliance are set out in section 4.8.
14-5	Consulting the community - table 3	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 consultation zone 2.	The Applicant wrote to elected representatives, parish councils and community groups within the zone with details of the consultation at the start of the consultation period (excluding those identified in section 4.8). This included a consultation information pack sent by email designed to support stakeholders promoting consultation through their own existing communication channels such as social media feeds. This is included with the consultation materials in Appendix I-1 .
14-5	Consulting the community - table 3	Writing to the Leader and Chief Executive of local authorities within consultation zone 3	The Applicant wrote to the Leader and Chief Executive of local authorities within consultation zone 3 at the start of the consultation

Page	Section	Commitment	Compliance
			period.
14-5	Consulting the community - table 3	Publicising the consultation in the following newspapers circulating in the consultation zone: the Cambridge News, the East Anglian Daily Times and Eastern Daily Press	The Applicant advertised the consultation in the following newspapers circulating in the consultation zone: the Cambridge News (24 September 2020, 1 November 2020, 5 November 2020), the East Anglian Daily Times (23 September 2020, 5 November 2020, 12 November 2020) and Eastern Daily Press (23 September 2020). Copies are provided in Appendix G-3 .
14-5	Consulting the community - table 3	Publicising the consultation via the following broadcasters: BBC Radio Cambridgeshire, BBC Suffolk, BBC Look East	The Applicant publicised the consultation in this zone via regional and local broadcasters including interviews on BBC Radio Cambridgeshire (10 November 2020), BBC Radio Suffolk (16 October 2020, 5 November 2020) and ITV Anglia (23 November 2020).
14-5	Consulting the community - How will we be consulting?	Consider holding public events on a voluntary basis in consultation with local authorities if the coronavirus threat level has been lowered to 1 or 2 by 27 October 2020	As the coronavirus threat level was not lowered to 1 or 2 by 27 October 2020, public events were not scheduled.
16	Consulting the community - How will we be consulting?	Publicise changes to consultation arrangements by: <ul style="list-style-type: none"> a. Writing to all addresses and elected representatives within consultation zone 1; b. Writing to all district and county councillors at West Suffolk Council, East 	As set out in section 4.7, the Applicant publicised the extension of the consultation period to 18 December 2020 and the scheduling of additional webinars by each of these means.

Page	Section	Commitment	Compliance
		<p>Cambridgeshire District Council, Suffolk County Council and Cambridgeshire County Council;</p> <p>c. Writing to all parish councils within consultation zone 2;</p> <p>d. Publicising the change of arrangements in the Newmarket Journal, the Cambridge News, Bury Free Press, the Ely Standard and the East Anglian Daily Times; and,</p> <p>e. Publicising the change of arrangements on social media.</p>	
16	Consulting the community - consultation information	<p>We will produce a range of materials providing information as part of the consultation, including:</p> <p>a) A consultation booklet providing a non-technical overview of the proposed Sunnica Energy Farm, the EIA process, the consultation and planning process, and proposed next steps;</p> <p>b) A virtual exhibition setting out information about the proposals and how to take part in the consultation;</p> <p>c) A presentation to be given as part of webinars;</p> <p>d) The PEI Report, accompanied by a non-technical summary; and,</p> <p>e) A consultation questionnaire designed to collect responses to the consultation.</p>	The Applicant produced these materials as set out in 4.5.11 and included in Appendixes G-2 and G-4.
17	Consulting the community - consultation information	Copies of consultation information will be made available for review free of charge online on the Scheme	Copies of all consultation information were made available for review free of charge online on the

Page	Section	Commitment	Compliance
		website and, should it become possible as outlined above, at public deposit points. Hard copies of documents will also be made available on request.	Scheme website. While public deposit points were not included in the SoCC, the Applicant identified the opportunity to provide a hard copy of the PEI Report to Freckenham Parish Council, Chippenham Parish Council, Worlington Parish Council, Barton Mills Parish Council, Exning Parish Council, Red Lodge Parish Council and Fordham Parish Council for residents to access during the consultation period. The Applicant also made hard copies of the consultation booklet, questionnaire, and other consultation materials available on request.
17	Consulting the community - Collection of responses	To capture participants' feedback, we will produce a consultation questionnaire inviting comments on the different elements of the proposed Sunnica Energy Farm.	Sunnica produced a consultation questionnaire as set out in 4.5.18 and included in Appendix G-2 .
17	Consulting the community - Collection of responses	The questionnaire will be made available by direct mail to people living in consultation zone 1, online through the proposed Sunnica Energy Farm website and on request.	The Applicant sent a copy of the consultation questionnaire to all addresses in consultation zone 1, made it available on the Scheme website, and provided hard copies on request.
17	Consulting the community - Seldom heard audiences	Hold webinars at a variety of times, including evenings and weekends, to enable participation by people with different time commitments and making recordings of webinars	The Applicant held webinars at a variety of times including evenings and weekends and made recordings of the webinars available on the Scheme website afterwards. Details

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		available afterwards.	of webinars held as part of the consultation as included in Table 4-7 .
17	Consulting the community - Seldom heard audiences	Make provision for people who do not have access to the internet through the consultation programme. This will include sending a copy of the consultation booklet and consultation questionnaire to every address in consultation zone 1, offering one-to-one telephone appointments, and making hard copies of consultation materials available on request.	The Applicant sent a copy of the consultation booklet along with the consultation questionnaire to all addresses in consultation zone 1. It included details of how to book a one-to-one telephone appointment in the booklet and in consultation advertising. The Applicant also made hard copies of consultation materials available on request.
17	Consulting the community - Seldom heard audiences	Produce our consultation materials in accessible formats, including checking accessibility of online materials	The Applicant conducted a review of the Scheme website to check its accessibility.
17	Consulting the community - Seldom heard audiences	Contact community and voluntary organisations including schools and parish councils within consultation zone 1 to offer direct engagement and sharing a consultation information pack designed to support them in promoting consultation through their own existing communication channels such as social media feeds.	The Applicant contacted community and voluntary organisations within consultation zone 1 to offer direct engagement and share detailed of the consultation. These organisations are listed in Appendix H-1 .
17	Consulting the community - Seldom heard audiences	Provide a variety of communications channels including a Freephone number, email address, and Freepost address for those seeking information.	The Applicant provided a variety of communications channels including the Scheme website, a freephone number (0808 168 7925), a freepost address (Sunnica Consultation, FREEPOST reference RTRB-LUJJ-AGBY, c/o Newgate

Page	Section	Commitment	Compliance
			Communications, Sky Light City Tower, 50 Basinghall Street, London, EC2V 5DE) and an email address. These details were included in all consultation materials.
19	Consultation information - How to take part in the consultation	The statutory public consultation for Sunnica Energy Farm will take place between 22 September 2020 and 2 December 2020.	The Applicant extended the consultation period to 18 December 2020 and publicised this in the manner set out in section 4.7.
19	Consultation information - How to take part in the consultation	<p>Hold webinars at the following times and dates:</p> <ul style="list-style-type: none"> a) 18:00 on 01/10/20: Introducing the consultation; b) 14:00 on 03/10/20: Sunnica East Site A and Site B; c) 18:00 on 08/10/20: Sunnica West Site A and Site B; d) 14:00 on 10/10/20: The grid connection; e) 18:00 on 15/10/20: Environmental impact assessments (including landscape and biodiversity); f) 14:00 on 17/10/20: Construction and operations; g) 14:00 on 24/10/20: Repeat of Introducing the consultation; h) 18:00 on 29/10/20: Repeat of Sunnica East Site A and Site B; i) 14:00 on 31/10/20: Repeat of Sunnica West 	The Applicant held webinars at these times and dates as set out in Table 4-7 .

Page	Section	Commitment	Compliance
		<p>Site A and Site B;</p> <p>j) 18:00 on 05/11/20: Repeat of the grid connection;</p> <p>k) 14:00 on 07/11/20: Repeat of Environmental impact assessments (including landscape and biodiversity); and,</p> <p>l) 18:00 on 12/11/20: Repeat of Construction and operations.</p>	
19	Consultation information - How to take part in the consultation	Publish details of any additional webinars on the Scheme website.	The Applicant scheduled three additional webinars during the consultation period as set out in 4.5.10.
19	Consultation information - How to take part in the consultation	Host virtual exhibition from 22 September 2020 to the close of the consultation at 5pm on 2 December 2020.	The Applicant hosted a virtual public exhibition available on the Scheme website for the duration of the consultation period (until the end of the extended consultation period, 18 December 2020). This was accessible via the home page of the Scheme website.
19	Consultation information - How to take part in the consultation	Make it possible to book appointments to speak with members of the project team about our proposals individually using the contact details provided in the SoCC.	The Applicant invited consultees to book an individual appointment to discuss the Scheme by telephone, providing an opportunity for those without access to the internet to ask questions. Details of how to book an appointment were included in the consultation booklet and consultation advertising.

Page	Section	Commitment	Compliance
19	Consultation information - How to take part in the consultation	Send a copy of the booklet to all addresses in consultation zone 1. The booklet will also be available from the Scheme website, and on request.	The Applicant sent a copy of the consultation booklet to all addresses in consultation zone 1 at the start of the consultation period
19	Consultation information - How to take part in the consultation	Make the PEI Report and other consultation documents available on the Scheme website. A charge of £0.35 per page will be applicable for hard copies of the PEI Report and its non-technical summary.	The PEI Report and other consultation documents were made available on the Scheme website. In addition, the Applicant identified the opportunity to provide a hard copy of the PEI Report to Freckenham Parish Council, Chippenham Parish Council, Worlington Parish Council, Exning Parish Council, Red Lodge Parish Council, Fordham Parish Council and Barton Mills Parish Council for residents to access during the consultation period. This was provided free of charge.
19	Consultation information - How to take part in the consultation	All of the consultation materials and the consultation questionnaire will be made available on the Scheme website. Hard copies of consultation materials will be made available on request.	Copies of all consultation information were made available for review free of charge on the Scheme website. While public deposit points were not included in the SoCC, the Applicant also made hard copies of the consultation booklet, questionnaire, and other consultation materials available on request.
19	Consultation information - How we will consider the responses	Our DCO application will include a Consultation Report setting out how we have had regard to all responses received.	The DCO application includes this Consultation Report. The regard had to all responses received through the consultation is

Page	Section	Commitment	Compliance
			set out in Appendices J-1 – J-5 .

4.6 Section 48 (newspaper notices)

- 4.6.1 S48 of the PA 2008 imposes a duty on the Applicant to publish a notice of the proposed application in accordance with Regulation 4 of the APFP Regulations.
- 4.6.2 **Table 4-9** includes details of the newspapers used to publicise the proposed application, including national, local, and the London Gazette.
- 4.6.3 The notice published under s48 of the PA 2008 gave the deadline of 2 December 2020 for responses (more than 28 clear days from the date when the last notice was published).

Table 4-9 Publication of newspaper notices under s48 of the PA 2008

Name	Week 1	Week 2 (local only)
National Newspaper		
The London Gazette	17 September 2020	N/A
The Guardian	17 September 2020	N/A
Local Newspaper		
Ely Standard	17 September 2020	24 September 2020
Newmarket Journal	17 September 2020	24 September 2020

- 4.6.4 Copies of the newspaper notices as noted in **Table 4-9** are provided within **Appendix K-1**.
- 4.6.5 In accordance with Regulation 13 of the EIA Regulations 2017, the Applicant issued a copy of the section 48 notice to EIA consultation bodies as defined in Regulation 3 of the EIA Regulations 2017 (being those bodies prescribed under s42(1)(a) of the PA 2008 and set out in Schedule 1 of the APFP Regulations and the authorities within s43 of the PA 2008). These bodies are set out in **Appendix E-1**. This took place at the same time as publishing notice of the proposed application under s48(1) of the PA 2008, and as the consultation under s42 of the PA 2008 as set out in section 4.3. The s48 notice was sent to the prescribed consultees as part of the consultation materials as set out in paragraphs 4.3.23 to 4.3.25.

4.7 Supplementary consultation activity

Supplementary consultation during the consultation period

- 4.7.1 Following the commencement of the statutory consultation on 22 September 2020, the Applicant continued with its design development

process. This focussed on reviewing the access strategy to land to ensure that impacts to the highway network and agricultural land can be minimised wherever possible.

- 4.7.2 As a result of this design development work, the proposed Scheme boundary set out in the consultation materials published on 22 September 2020 needed to be amended to ensure that the Scheme could be properly delivered with minimal impacts. These amendments are shown in the plans included in **Appendix L-1**. The amendments did not introduce any new land interests.
- 4.7.3 The Applicant therefore wrote on 2 November 2020 to relevant consultees identified under s42(1)(a), (b) and (d) of the PA 2008 detailing the amendments to the Scheme boundary and inviting comment by the scheduled close of consultation on 2 December 2020. These letters were sent by recorded delivery and where it could not be confirmed that the letter was received, a follow up email was sent. The follow up email was sent on 5 November 2020 and the consultation was subsequently extended to 18 December 2020 ensuring that all consultees identified had a minimum of 28 days to respond. These consultees were identified as relevant, taking into account the location of the changes and that the changes related to vegetation and incorporating more of the Registered Park and Garden at Chippenham Park. A list of consultees contacted regarding the amendments to the Scheme boundary and a copy of the letter sent to them is included in **Appendix L-2**. The Applicant also made details of the amendments to the Scheme boundary available on the Scheme website.

Additional consultation

- 4.7.4 In addition to the community consultation carried out in compliance with the SoCC as set out in **Table 4-6**, the Applicant carried out further consultation on a voluntary basis.
- 4.7.5 The Applicant extended the period for responses available to consultees under s47 of the PA 2008 to 18 December 2020 in view of the Government's announcement of further restrictions relating to the COVID-19 pandemic. We have set out in 4.7.12 how the extended consultation was publicised.
- 4.7.6 As set out in 4.5.15, the Applicant identified an opportunity to provide a hard copy of the PEI Report for residents to access within parish councils in consultation zone 1 following contact from a number of parish councils. This was over and above the commitment made in the SoCC to publish the PEI Report to view free of charge on the Scheme website and make hard copies available on request at a charge of charge of £0.35 per page.
- 4.7.7 The Applicant therefore wrote to all parish councils within consultation zone 1 on 7 October 2020 offering a hard copy of the PEI Report free of charge. The Applicant requested parish councils to confirm that they would be able to allow residents to access the PEI Report in a manner compliant with Government regulations relating to COVID-19.
- 4.7.8 On this basis, the Applicant supplied a hard copy of the PEI Report to Freckenham Parish Council, Chippenham Parish Council, Worlington Parish

Council, Fordham Parish Council, Barton Mills Parish Council, Exning Parish Council and Red Lodge Parish Council for residents to access.

- 4.7.9 The Applicant also provided large-scale banners advertising the consultation for display within consultation zone 1 to the following parish councils: Freckenham Parish Council (27 October 2020), Worlington Parish Council (27 October 2020), Chippenham Parish Council (27 October 2020), Isleham Parish Council (27 October 2020), Fordham Parish Council (27 October 2020) and Red Lodge Parish Council (17 November 2020). A proof copy of the banner is included in **Appendix M-1**.
- 4.7.10 As set out in 4.5.10, the Applicant scheduled additional webinars on 18 November 2020, 25 November 2020, and 2 December 2020 after the start of the consultation period. These were additional webinars to allow further opportunity for people living in the local community to ask questions about the Scheme and took the format of a question and answer session.
- 4.7.11 The Applicant wrote to all consultees under s42(1)(a), (b) and (d) of the PA 2008 on 9 November 2020 to notify them of the extension of the consultation period. These letters were issued to recipients by recorded delivery. A copy of this letter is included in **Appendix L-3**.
- 4.7.12 The Applicant publicised the extension of the consultation period to 18 December 2020 and the additional webinars by:
- a. Writing to all addresses and elected representatives in consultation zone 1 on 9 November 2020;
 - b. Writing to all district and county councillors at West Suffolk Council, East Cambridgeshire District Council, Suffolk County Council and Cambridgeshire County Council on 9 November 2020;
 - c. Writing to all parish councils within consultation zone 2 on 9 November 2020 (excluding those identified in Section 4.8);
 - d. Placing adverts in the Newmarket Journal (11 November 2020), the Cambridge News (5 November 2020), Bury Free Press (13 November 2020), the Ely Standard (12 November 2020), and the East Anglian Daily Times (12 November 2020); and
 - e. Placing promoted advertising on Facebook on 12 November 2020.
- 4.7.13 This complied with the approach set out for publicising changes to consultation arrangements set out on page 16 of the SoCC.
- 4.7.14 Examples of the letters referenced in 4.7.12 are included in **Appendix L-3**. Copies of the adverts and examples of the promoted advertising on Facebook referenced in 4.7.12 are included in **Appendix G-3**.

4.8 Consultation with parish councils

4.8.1 Following the conclusion of the community consultation on 18 December 2020, the Applicant identified 529 parish councils that had not been consulted as specified within the SoCC in that they had not received a direct email notifying them of the consultation at the start of the consultation on 22 September 2020. This email was in addition to the wide publication of the consultation as outlined above.

4.8.2 These parish councils were those located in consultation zone 2 and outside of the districts of West Suffolk and East Cambridgeshire and not within s42(1)(a). Rather they were parish councils in the SoCC Consultation Zone 2. This included all parish councils in Suffolk and Cambridgeshire that are not in the districts of West Suffolk and East Cambridgeshire. These are listed in **Appendix M-2**.

4.8.3 The Applicant wrote to these parish councils on 22 December 2020 to explain that they had not been consulted and invite them to submit any representations that they wished to make by 29 January 2021 (more than 28 days after the email was received).

4.8.4 In total, nine parish councils that were consulted in this way made representations. These responses are summarised in the following section of this document.

4.9 Engagement following statutory consultation

4.9.1 The Applicant has continued to engage with the host authorities following the conclusion of the statutory consultation. This has included meetings to discuss the wording of the requirements in the draft DCO [EN010106/APP/3.1], community enquiries and deposit points during examination.

4.9.2 Members of the project team met with concerned residents to discuss the proposals to access Sunnica East Site B on 28 July 2021. Members of the project team listened to the concerns outlined and following further engagement with the local highways authorities and National Highways has proposed access points as set out in Appendix 13C: Framework Construction Traffic Management Plan (CTMP) and Travel Plan of the Environmental Statement [EN010106/6.2].

4.9.3 The Applicant issued an update newsletter on 16 August 2021 to zone 1 used during the statutory consultation. The purpose of the newsletter was to update the community on design changes made as a result of feedback received during the statutory consultation. The newsletter was also shared with parish councils within consultation zone 1 and on the project website. A copy of the newsletter can be found in **Appendix M-3**.

4.9.4 The Applicant was contacted on 18 October 2021 by West Suffolk Council to make it aware of a caravan site used by the Gypsy and Traveller community adjacent to the Order limits at Elms Road, Red Lodge. West Suffolk Council requested that the Applicant check whether this site had received consultation materials.

4.9.5 The Applicant notes that it contacted the Gypsy and Traveller liaison services at Suffolk County Council and Cambridgeshire County Council on 22 September 2020 as part of the statutory consultation to identify the presence of relevant sites used by the Gypsy and Traveller community in the vicinity of the Scheme. The Applicant was not advised at this time of the presence of the site at Elms Road.

4.9.6 Having checked the Royal Mail Postcode Address File used to deliver consultation materials to consultation zone 1, the Applicant identified that there is not an address held by Royal Mail for this location. Furthermore, the Applicant

conducted a site visit identified and identified that there was no postbox available. Direct access was not possible at this time as the gate to the site was locked.

4.9.7 The Applicant notes that it would not be possible to issue consultation documents by post to the address given that it is not present in the Royal Mail Postcode Address File. It also considers that it made best endeavours to identify sites used in this way through engagement with the relevant liaison services at Cambridgeshire County Council and Suffolk County Council.

4.9.8 Nonetheless, once it was made aware of the site, the Applicant wished to ensure that occupants were aware of the Scheme. Given that it was not possible to gain direct access to the site or contact occupants through the post, the Applicant therefore erected a site notice with details of the Scheme in the vicinity of the site on 25 October 2021. It also contacted the Gypsy and Traveller liaison officer at Suffolk County Council to request support in engaging with occupants of the site. To date, no responses have been received. Should the Application be accepted, the Applicant would again erect a site notice at this location informing the residents of the acceptance of the Scheme and to invite them to make representations and take part in the Examination.

5 Additional consultation with s42(1)(d) consultees

5.1 Summary of consultation activity

5.1.1 Following the conclusion of the statutory consultation, the Applicant has continued to develop its Scheme. This process has been guided by the results of the Applicant's survey activity and the feedback received through the statutory consultation. This has included reviewing the access strategy for the Scheme.

5.1.2 As a result of this design development work, the Applicant has needed to make minor amendments to the proposed Order limits. These have been done to ensure that the Scheme could be delivered with minimal environmental impacts. These amendments involved adding land comprising parts of local highways to facilitate crane access to the Scheme during construction. This would allow works to the highway during the construction phase of the Scheme, such as the temporary removal of street furniture and tree pruning. These amendments are shown in **Appendix N-1**.

5.1.3 These minor amendments were made iteratively and related to four sets of changes. The first was made on 12 February 2021 and related to a change to the Order limits at the Horse Racing Forensic Laboratory to the east of Newmarket Road, Fordham. This change was made to allow access to the cable corridor to facilitate the Scheme.

5.1.4 A further set of changes were made on 16 June 2021 and involved extending the Order limits to enable crane access to the Scheme during construction. A total of 85 interests were identified and consulted at this time. This included one site notice. Subsequently, the Applicant identified an interest through the site notice and wrote again to one interest to ensure that they were given a minimum of 28 days to respond. Through additional research, the Applicant identified an interest where incorrect information had been provided through Companies House. The Applicant wrote to this interest using the correct details on 6 August 2021 to ensure that they had a minimum of 28 days to respond and made subsequent attempts to ensure receipt of the letter, as set out in **Table 5-1**.

5.1.5 The Applicant made a third set of changes to the Order limits on 20 August 2021. These changes were to facilitate access to the Scheme sites and to allow the provision of visibility splays during construction.

5.1.6 The Applicant made its fourth set of changes to the Order limits on 21 September 2021 as a result of a need to accommodate two-way vehicle movements along Elms Road.

5.1.7 The Applicant subsequently identified further consultees through its ongoing diligent inquiries and identified consultees both domestically and internationally for whom it could not confirm receipt of previous consultation letters. This included 3 new consultees and 7 consultees for whom consultation letters were undelivered (5 domestic and 2 international). The Applicant subsequently wrote to each by recorded delivery (and hand delivery for domestic, previously undelivered consultees) as set out in **Table 5-1** below.

5.1.8 The Applicant carried out further targeted consultation with Suffolk County Council to notify the authority of the third and fourth set of changes to the Order limits. The Applicant hand delivered a letter to the authority to notify it of these changes on 11 October 2021.

5.1.9 The iterations of the Applicant's targeted consultation are set out in **Table 5-1**.

5.1.10 The Applicant therefore undertook targeted consultation with affected s42(1)(d) consultees as required by the PA2008 in light of the changes to the Order limits. Land interests were identified through a process of diligent inquiry undertaken by the Applicant using the methodology set out between 4.3.6 to 4.3.20. This process was repeated with each change to the Order limits to ensure that any additional identified interests were consulted.

5.1.11 Through diligent inquiry, the Applicant considers that there are no persons who might be entitled to make a relevant claim as a Category 3 interest pursuant to Part 1 of the Land Compensation Act 1973. This is in relation to the factors set out in 4.3.18.

5.1.12 The changes to the Order limits were limited to highways and therefore adjacent houses or land to the affected highways were identified, who were believed to hold a subsoil interest in the highway. Due to the nature of the interest, the consultation activity was targeted at freeholders of properties and registered businesses. Where companies were identified, company details were checked through information held by Companies House.

5.1.13 Where, as a result of changes to the Order limits, persons have been removed or brought into the Order limits, that is described in **Appendix E-2**.

5.1.14 All s42(1)(d) consultees were given a minimum of 28 days to respond to the targeted consultation. The Applicant wrote to each consultee by recorded delivery or, in cases where it was unable to confirm receipt through postal records, hand delivered correspondence. The Applicant gave additional time to respond to one consultee who did not receive the letter due to a postal delay and wrote again to a separate consultee having been made aware that an address previously provided through Land Registry and Companies House was incorrect. These are summarised in **Table 5-1**. The Applicant was subsequently able to confirm receipt of all consultee letters.

5.1.15 Statutory undertakers were also contacted to query whether they had any infrastructure on or over the new land being included the Order limits.

5.1.16 Where land interests could not be identified, site notices were erected requesting information about the ownership of the land and signposting contact details for the project team. Notices were placed on the land for a minimum of six weeks unless the land interest was confirmed prior to this.

5.1.17 During this targeted consultation, the Applicant continued to make all the consultation materials available to consultees through the Scheme website, including the PEI Report and virtual exhibition referred to in 4.5.11. The Applicant sought feedback through the consultation questionnaire (**Appendix G-2**), email and by

Freepost. Given that this consultation activity was targeted to a small number of consultees, the Applicant did not collect responses through an online questionnaire.

5.1.18 A summary of the targeted consultation undertaken by the Applicant is given in **Table 5-1** below and summarised in Section 5.2. Copies of the materials issued to consultees are given in **appendices N-1 to N-12** and signposted in **Table 5-1**. The Applicant has provided a list of s42(1)(d) consultees that it has consulted in **Appendix E-2**. This includes the dates of each consultation with each interest.

Table 5-1 Summary of targeted consultation

Consultation dates	Number of interests consulted	Method of contact	Purpose of consultation	Copy of materials
13 February 2021 – 17 March 2021	7	Letters issued by recorded delivery on 12 February 2021	To notify consultees of a change to the Order limits at the Horse Racing Forensic Laboratory to the east of Newmarket Road, Fordham. This change was made to allow access to the cable corridor to facilitate the Scheme.	Consultation letter (Appendix N-2) Consultation booklet (Appendix G-4) Consultation questionnaire (Appendix G-2) Plan of the Order limits (version showing all changes, Appendix N-1)
17 June 2021 - 26 July 2021	85	Letter issued by recorded delivery on 16 June 2021 (84) and site notice (1) erected at Exning on 25 June 2021 to 6 August 2021	To notify consultees identified under s42(1)(d) of the PA 2008 of changes to the Order limits to facilitate crane access to the Scheme sites.	Consultation letter (Appendix N-3) Consultation booklet (Appendix G-4) Consultation questionnaire (Appendix G-2) Plan of the Order limits (version showing all changes, Appendix N-1)
28 July 2021 - 27 August 2021	2	Letter issued by recorded delivery on 26 July 2021	To consult with an interest identified through the site notice posted on 25 June 2021 and to give additional time to a separate consultee who, due to a postal delay, did not receive the full 28 days to comment during	Consultation letter (Appendix N-5) Consultation booklet (Appendix G-4) Consultation questionnaire (Appendix G-2)

Consultation dates	Number of interests consulted	Method of contact	Purpose of consultation	Copy of materials
			the previous targeted consultation.	Plan of the Order limits (version showing all changes, Appendix N-1)
30 July 2021 - 3 September 2021	1	Letter issued by hand delivery	<p>An incorrect address for a consultee was previously provided through the Land Registry and Companies House. The Applicant made contact with the consultee following identification of a correct address. The Applicant made the following attempts to ensure delivery to this consultee:</p> <p>a. 16 July 2021 - posted consultation letter by recorded delivery to address provided through the Land Registry - <i>letter was undelivered (incorrect address)</i></p> <p>b. 26 July 2021 – posted new consultation letter by recorded delivery to Companies House address (see row above)</p> <p>c. 28 July 2021 – The Applicant conducted a check of Royal Mail tracking information which showed that the letter was again undelivered</p> <p>4) 30 July 2021 – The Applicant’s agents hand delivered a consultation letter to Companies House address - <i>the date of receipt did not provide consultee with clear 28 days</i></p> <p>4) 6 August 2021 – the Applicant’s agents hand delivered a consultation letter again (dated 30</p>	<p>Consultation letter (Appendix N-6)</p> <p>Consultation booklet (Appendix G-4)</p> <p>Consultation questionnaire (Appendix G-2)</p> <p>Plan of the Order limits (version showing all changes, Appendix N-1)</p>

Consultation dates	Number of interests consulted	Method of contact	Purpose of consultation	Copy of materials
			July) accompanied by an extension letter which confirmed that the consultee's consultation period would run until 3 September 2021	
23 August 2021 - 24 September 2021	7	Letter issued by recorded delivery on 20 August 2021 and included two letters issued to a land interest with an alternative address	Changes to the Order limits to facilitate access to the Scheme sites (including alternative access) and for provision of visibility splays during the construction phase.	Consultation letter (Appendix N-8) Consultation booklet (Appendix G-4) Consultation questionnaire (Appendix G-2) Plan of the Order limits (version showing all changes, Appendix N-1)
24 September 2021 – 25 October 2021	8	Letter issued by recorded delivery on 21 September 2021 and included two letters issued to a land interest with an alternative address to confirm delivery.	Changes to the Order limits to accommodate two-way vehicle movements on Elms Road.	Consultation letter (Appendix N-9) Consultation booklet (Appendix G-4) Consultation questionnaire (Appendix G-2) Plan of the Order limits (version showing all changes, Appendix N-1)
5 October 2021 – 1 November 2021 (new interests and undelivered, hand delivered) 9 October 2021 – 5 November 2021 (International, posted)	10	Letters issued by hand delivery on 4 October 2021 for 3 new interests and 7 interests where initial delivery was unsuccessful (international and domestic) International letters posted	To ensure receipt of previous consultation letters, the Applicant checked its records and carried out further diligent inquiry to identify additional s42(1)(d) consultees and consultees that had not received previous correspondence. The Applicant wrote to each, providing a minimum of 28 days to respond.	Consultation letter (Appendices N-10 and N-11) Consultation booklet (Appendix G-4) Consultation questionnaire (Appendix G-2) Plan of the Order limits (version showing all

Consultation dates	Number of interests consulted	Method of contact	Purpose of consultation	Copy of materials
		on 1 October 2021 to allow for extended delivery time	These included the following: a. new interests (3 consultees) b. previously undelivered domestic mailings (5 consultees) c. previously undelivered international mailings (2 consultees)	changes, Appendix N-1)
12 October – 8 November 2021	1	Consultation letter hand delivered on 11 October 2021	To consult with Suffolk County Council on changes to the Order limits to facilitate access to the Scheme sites (including alternative access) and for provision of visibility splays during the construction phase, and to accommodate two-way vehicle movements on Elms Road.	Consultation letter (Appendix N-12) Consultation booklet (Appendix G-4) Consultation questionnaire (Appendix G-2) Plan of the Order limits (version showing all changes, Appendix N-1)

5.2 Targeted consultation activity

5.2.1 The first change to the Order limits (following the statutory consultation) requiring targeted consultation was made on 12 February 2021 and related to a change to the Order limits at the Horse Racing Forensic Laboratory to the east of Newmarket Road, Fordham. This change was made to allow access to the cable corridor to facilitate the development. The Applicant wrote to 7 interests by recorded delivery and provided in excess of 28 days to respond, from 13 February to 17 March 2021.

5.2.2 The Applicant wrote to identified land interests by recorded delivery on 16 June 2021 to inform them that they had been identified as an interest. In total, the Applicant issued 84 letters to land interests and erected 1 site notice at Exning from 25 June 2021 to 6 August 2021. Consulted land interests received in excess of 28 days from the day after receipt of the consultation documents to submit a response in accordance with s42(1)(d) of the PA 2008, from 17 June until 26 July 2021.

5.2.3 The Applicant subsequently wrote to two interests by recorded delivery on 26 July 2021 and gave the consultees 28 days following receipt of the letter to submit a consultation response. This additional correspondence was issued as a result of the following: a) identification of an interest through the site notice which was erected on 25 June 2021 as part of the consultation referenced in 5.2.2 and b) a delay in

postage meant a consultee did not receive the full 28 days to comment. The consultation period for these two consultees ran from 28 July to 27 August 2021.

5.2.4 An additional letter was issued to a consultee identified under s42(1)(d) of the PA 2008 as the addresses given both through the Land Registry and Companies House were incorrect. The Applicant wrote to the identified consultee and ensured that the correspondence was hand delivered, giving them 28 days following receipt of the letter to respond. The consultation period for this consultee ran from 30 July 2021 to 3 September 2021.

5.2.5 Further revisions to the Order limits were identified in order to further facilitate crane access to the proposed extension to the Burwell National Grid substation. These revisions consisted of:

- a) An extension of the proposed Order limits to include an additional part of the hardstanding at Anchor Lane Farm in order to facilitate alternative access to the Scheme during its construction phase; and,
- b) An extension of the proposed Order limits to include parts of the highway that are required to facilitate access to the Scheme during its construction phase. This included construction of the site access and tie-in with Newmarket Road and the provision of the required visibility splays for safe access and egress into the Scheme during construction.

5.2.6 The Applicant undertook targeted consultation with affected s42(1)(d) consultees as required by the PA 2008. Seven consultees were identified. Two letters were issued to a single consultee (through an alternative address) regarding amendment (a) and six consultees were notified with regard to amendment (b) as described above. Letters were issued to the consultees by recorded delivery. Each consultee was given a minimum of 28 days following receipt of the letter to respond with any comments. This consultation period ran from 23 August to 24 September 2021.

5.2.7 Further revisions to the Order limits were identified in order to accommodate two-way vehicle movements on Elms Road. The Applicant undertook targeted consultation with affected s42(1)(d) consultees as required by the PA 2008 following changes to the Order limits. Eight interests were identified by the Applicant and letters were issued to each by recorded delivery giving the consultees 28 days from the day following receipt of the letter to respond. Two letters were issued to a single consultee (through an alternative address) to confirm delivery. This consultation period ran from 24 September to 25 October 2021.

5.2.8 The Applicant subsequently identified further consultees through its diligent inquiries and identified consultees for whom it could not confirm receipt of previous consultation letters. This included 3 new consultees and 7 consultees for whom consultation letters were undelivered (5 domestic and 2 international). The Applicant wrote to the two international interests on 1 October by recorded delivery and allowed five days for the correspondence to be delivered. This consultation was carried out between 9 October and 5 November 2021. The Applicant wrote to the eight interests within the UK on 4 October 2021 by recorded delivery and hand

delivery (for the five consultees whose correspondence was previously undelivered) and consulted between 5 October and 1 November 2021.

5.2.9 The Applicant carried out further targeted consultation with Suffolk County Council to notify the authority of the changes to the Order limits outlined in 5.2.5. The Applicant hand delivered a letter to the authority to notify it of these changes on 11 October 2021 and consulted on these changes between 12 October and 8 November 2021.

5.2.10 Details of the responses that the Applicant has received to its targeted consultation activity and how the Applicant has had regard to these responses can be found in Section 6.6 and **Appendix J-5**.

6 Consultation responses

6.1 Chapter overview

6.1.1 This chapter of the Consultation Report provides an overview of responses received from consultees under s42, s44, s47 and s48 of the PA 2008, as well details of the regard had to them by the Applicant.

6.1.2 As recommended by the Inspectorate's *Advice note fourteen: Compiling the Consultation Report*, in preparing this section the Applicant considered grouping the responses under the three strands of consultation – s42, s47 and s48. All consultees prescribed under s42(1)(a) and (b) are required to receive the s48 notice. None of the consultees who responded identified themselves as specifically responding to the s48 notice. Given those required to receive the s48 notice are the same consultees as prescribed by s42(1)(a) and (b), those consultees are dealt with together in section 6.2. Responses from the local community, consulted under s47, are addressed in section 6.3; from the parish councils identified above in section 4.8 (that is, not parish councils prescribed under s42(1)(a), but consulted as part of the local community under s47) in section 6.4; responses from Category 1, 2 and 3 people, pursuant to sections 42(1)(d) and 44 are addressed in section 6.5; and responses to the additional consultation described in Chapter 5 in section 6.6. The approach to s48 consultees is explained briefly in section 6.7.

6.1.3 The Applicant treated all responses received on or before 18 December as relevant responses. Responses that were received following the consultation deadline of 18 December 2021 with a postmark dated prior to the consultation deadline were accepted up to 23 December 2021.

6.1.4 Within each section, responses are sorted by theme, setting out the regard had to the responses by the Applicant. The Applicant has responded to all comments in full within **Appendices J-1 to J-5**, including identifying whether they have led to a change in matters such as siting, route, design, form or scale of the Scheme itself, or to mitigation or compensatory measures proposed, or have led to no change.

6.1.5 The following pages of this chapter and **tables 6-1 to 6-58** include references to field numbers. The field numbers present in the Applicant's design as submitted can be found in the parameter plans which are figure 3-1 and 3-2 of the ES [EN010106/APP/6.3]. Where comments refer to field numbers included in the design presented at the statutory consultation, please refer to the parameter plans at figures 3-1 and 3-2 of the ES [EN010106/APP/6.3].

6.2 Section 42(1)(a) & (b) (s42) consultation: prescribed consultees & local authorities

6.2.1 The Applicant solicited written responses to consultation under s42 of the PA 2008 by letter or email. A number of consultees also submitted their feedback using the consultation questionnaires, available both in hard copy and online.

6.2.2 A total of 31 responses were received from consultees under s42(1)(a) and (b) of the PA 2008. Each comment and the Applicant's response to it, is included within **Appendices J-1 and J-2** of this document.

6.2.3 The responses received to the consultation under s42(1)(a) and (b) of the PA 2008 have been analysed and considered by the project team and are presented in this section according to the following themes. Each of these themes is then discussed individually below, and the regard had to the responses is provided in **Appendix J-1** and **Appendix J-2**:

- | | |
|--|---|
| a. Location; | l. Heritage; |
| b. Land Use; | m. Transport and Access; |
| c. Need; | n. Water Resources; |
| d. Design (including all Scheme elements); | o. Human Health; |
| e. Consultation; | p. Glint and Glare; |
| f. EIA Process; | q. Renewable Energy and Climate Change; |
| g. Construction; | r. Economy; |
| h. Operations; | s. Planning; |
| i. Decommissioning; | t. Noise and Vibration; and, |
| j. Ecology; | u. Other. |
| k. Landscape and Visual Amenity; | |

Location

6.2.4 Consultees that provided substantive comments relating to the location of the Scheme and site selection included:

- | | |
|---------------------------------|--|
| a. Barton Mills Parish Council; | g. Suffolk County Council; |
| b. Chippenham Parish Council; | h. West Suffolk Council; |
| c. Fordham Parish Council; | i. East Cambridgeshire District Council; |
| d. Freckenham Parish Council; | j. Cambridgeshire County Council; and, |
| e. Isleham Parish Council; | k. Worlington Parish Council. |
| f. Snailwell Parish Council; | |

6.2.5 The matters raised most commonly by the above consultees included:

- Proposals of this kind are usually located in sparsely populated environments and not close to villages;
- The Applicant has failed to consider development on existing buildings or brownfield sites over agricultural land;
- The Scheme would be better sited closer to the point of grid connection at Burwell;

- d. There is little evidence that alternative methods of delivering the same volumes of renewable energy have been considered;
- e. The PEI Report does not provide a full analysis of alternative sites;
- f. The use of four separate sites requires additional cabling that should be justified;
- g. The Applicant has failed to provide evidence of how the site selection process has sought to avoid existing settlements;
- h. The Applicant should provide details of how other energy developments (built or under planning consideration) connecting to the grid at Burwell have been considered;
- i. The Applicant should provide further independent assessment as to the quality of the agricultural land within the Scheme; and
- j. The location could potentially impact upon the Breckland Special Protection Area (SPA).

6.2.6 The Applicant has had regard to all comments relating to site selection in **Appendix J-1** and **Appendix J-2**. Within **Appendices J-1 and J-2**, these comments are grouped under the 'Land use' topic. With regard to the matters raised in 6.2.5 above, the Applicant has set out its approach in **Table 6-1** below.

Table 6-1 Regard had to comments received from Section 42(1)(a) and (b) consultation relating to the location of the Scheme and site selection

Matter raised	Regard had to comment by the Applicant
Proposals of this kind are usually located in sparsely populated environments and not close to villages	The Applicant has followed a step-by-step process which confirms the location of the Scheme is suitable for a large-scale solar farm. This has considered land within a 15km search area from the point of connection at Burwell National Grid Substation. Details of the process are set out in Chapter 4 Alternatives and Design Evolution of the Environmental Statement [EN010106/APP/6.1] and Appendix 4A Alternative Sites Assessment [EN010106/APP/6.2].
The Applicant has failed to consider development on existing buildings or brownfield sites over agricultural land	Consideration has been given to the use of previously developed land when selecting the Order land which is discussed in the Appendix 4A Alternative Sites Assessment of the ES [EN010106/APP/6.2], however previously developed land of the size

Matter raised	Regard had to comment by the Applicant
	required by the Scheme has not been found.
<p>The Scheme would be better sited closer to the point of grid connection at Burwell</p>	<p>The Applicant has followed a step-by-step process which confirms the location of the Scheme is suitable for a large scale solar farm. This has considered land within a 15km search area from the point of connection at Burwell National Grid Substation which is considered by the Applicant to be the maximum viable distance for the area of search based on cost estimates provided by their independent connection provider/contractor.</p> <p>Planning policy seeks to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5). The Scheme's proposed location has been determined through the exclusion of grades 1, 2 and 3 agricultural land classification. Soil surveys (see Soils and Agriculture Baseline Report at Appendix 12B: of the Environmental Statement [EN010106/APP6.2]) have confirmed 96.2% of the land is poorer quality agricultural land, while land closer to Burwell Substation is of higher ALC grade. The Alternative Analysis identified seven potential development areas, none of these areas are large enough to provide the minimum land required to accommodate the whole Scheme, however, the potential development areas are in close proximity to each other to enable land parcels to be connected together to provide the land required. Details of the process are set out in Chapter 4 Alternatives</p>

Matter raised	Regard had to comment by the Applicant
	<p>and Design Evolution of the Environmental Statement [EN010106/APP/6.1] and Appendix 4A Alternative Sites Assessment [EN010106/APP/6.2].</p>
<p>There is little evidence that alternative methods of delivering the same volumes of renewable energy have been considered</p>	<p>The Applicant has provided analysis of the benefit the Scheme brings to the national endeavour of clean, secure and affordable energy in two ways. Firstly, in comparison to combinations of smaller independent solar schemes which generate the same total output as the proposed Scheme, and secondly in relation to generating capacity relative to other energy generation technologies. These are contained in the Statement of Need [EN010106/APP/7.1] and Chapter 4: Alternatives and Design Evolution of the Environmental Statement [EN010106/APP/6.1].</p> <p>Decarbonisation is a UK legal requirement and solar generation plays and must continue to play an important role in the urgent decarbonisation of the UK energy supply. The cost of solar generation in the UK is already very competitive when compared to other forms of low-carbon energy generation. Solar must form part of a diverse generation mix with other forms of low-carbon technology. Solar has an important role to play as part of the generation mix in smoothing out seasonal variations in generation alongside other low-carbon technologies.</p> <p>The Applicant's analysis in the Statement of Need [EN010106/APP/7.1] has concluded that size is important in maximising the economic efficiency and carbon benefits of solar schemes. Larger solar scheme such as the proposed Sunnica Energy Farm are</p>

Matter raised	Regard had to comment by the Applicant
	<p>able to deliver power more quickly and at a lower unit cost than multiple solar schemes of a similar size totalling the same overall capacity. In doing so, larger schemes are able to deliver carbon reduction and economic benefits more quickly than alternative smaller developments. This is particularly important with regard to meeting the UK's net zero obligations in the 2020s timeframe.</p>
<p>The PEI Report does not provide a full analysis of alternative sites</p>	<p>The alternatives chapter of the PEIR presented an overview of the methodology for site selection and the key reasons for selecting land for the Scheme. The information presented was appropriate for the statutory consultation.</p> <p>Appendix 4A Alternative Sites Assessment of the ES [EN010106/APP/6.2] provides the detailed assessment and consideration of alternative sites within the 15km study area for the Scheme. Chapter 4 of the ES [EN010106/APP/6.1] provides a summary.</p> <p>The Applicant is proposing the Scheme in response to the urgent national need for new, renewable, forms of energy generation. The battery storage element of the Scheme will provide a complementary suite of services to the solar PV element. These services will include a crucial grid balancing role. Further information on this is provided in the Statement of Need [EN010106/APP/7.1].</p>
<p>The use of four separate sites requires additional cabling that should be justified</p>	<p>The Applicant has given significant consideration to the siting of the proposed Sunnica Energy Farm. The Applicant has sought to use land that is</p>

Matter raised	Regard had to comment by the Applicant
	<p>not considered to be 'best and most versatile' (agricultural land classification grades 1, 2 and 3a). This has been a key consideration in choosing the location for the project. Proximity to the grid connection is also an important consideration and the land proposed for inclusion within the Order Limits is considered to be appropriate for solar and battery storage development, being within a 15km radius of the Burwell National Grid Substation.</p> <p>The Applicant considered the potential for energy loss at a 15km radius during the design process and considers the project to be viable. Further details of how the Applicant has chosen the location of the project can be found in Chapter 4: Alternatives and Design Evolution of the Environmental Statement [EN010106/APP/6.1].</p> <p>The Applicant is proposing a project of this size to meet a national need for new forms of renewable energy generation. As the United Kingdom is aiming to meet its net zero climate obligations and to replace older forms of energy generation, projects of this kind are required to provide clean forms of energy generation to the national electricity grid. Further details of the need for the proposed Sunnica Energy Farm are provided in the Statement of Need [EN010106/APP/7.1].</p>
<p>The Applicant has failed to provide evidence of how the site selection process has sought to avoid existing settlements</p>	<p>The Applicant has followed a step-by-step process which confirms the location of the Scheme is suitable for a large-scale solar farm. This has included the avoidance of residential areas in confirming site suitability and consideration of alternative sites. Details of the process are set out in Chapter 4 Alternatives and Design</p>

Matter raised	Regard had to comment by the Applicant
	Evolution of the Environmental Statement [EN010106/APP/6.1] and Appendix 4A Alternative Sites Assessment [EN010106/APP/6.2].
The Applicant should provide details of how other energy developments (built or under planning consideration) connecting to the grid at Burwell have been considered	An assessment of cumulative impact has been undertaken by the Applicant. These are included in each of the technical chapters (Chapters 6 to 16) and summarised in Chapter 17 of the ES [EN010106/APP/6.1]. This includes details of all the planning applications that have been submitted or accepted within the proximity of the Scheme.
The Applicant should provide further independent assessment as to the quality of the agricultural land within the Scheme	The Applicant has undertaken an assessment of the land used for the Scheme. In line with the requirements of the National Planning Policy Framework (NPPF), the Applicant has sought to avoid using agricultural land considered to be 'best and most versatile' (grades 1, 2 and 3a). Based on our assessments, the majority of the land (96.2%) proposed for use within the Sites is classed as not being 'best and most versatile' and is predominantly grades 3b and 4. The Applicant does not consider this to be an 'unfair assessment'. The proposed Sunnica Energy Farm will rest the land for a period of time and provide a much-needed new source of renewable energy generation. Full details of this assessment can be found in Appendix 12B Soils and Agriculture Baseline Report of the Environmental Statement [EN010106/APP/6.2]. Assessment of the agricultural land quality and versatility follows Natural England Guidance given in TIN049.
The location could potentially impact upon the Breckland Special Protection	The potential effects on the Breckland SPA, Chippenham Fen NNR and Ramsar and Fenland SAC have been

Matter raised	Regard had to comment by the Applicant
Area (SPA)	assessed in Chapter 8 of the Environmental Statement [EN010106/APP/6.1]. No significant adverse effects have been concluded for these designated (or any other designated ecological sites) during construction, operation or decommissioning. A Habitats Regulations Assessment, Stage 2 Appropriate Assessment has been undertaken and is provided in Appendix 8M of the Environmental Statement.

Land use

6.2.7 Consultees that provided substantive comments relating to the Scheme's land use included:

- | | |
|---------------------------------------|--|
| a. Cambridgeshire Local Access Forum; | i. Cambridgeshire County Council; |
| b. Chippenham Parish Council; | j. West Suffolk Council; |
| c. Fordham Parish Council; | k. East Cambridgeshire District Council; |
| d. Freckenham Parish Council; | l. West Row Parish Council; |
| e. Isleham Parish Council; | m. Worlington Parish Council; and, |
| f. Natural England; | n. Suffolk Local Access Forum. |
| g. Snailwell Parish Council; | |
| h. Suffolk County Council; | |

6.2.8 The matters most commonly raised by the above consultees included:

- Mitigation should be incorporated to improve Public Rights of Way (PRoW) in and around the sites;
- Doubt over the Applicant's assessment of agricultural land quality;
- Create alternative PRoW during the construction phase of the project to compensate for any impact on existing routes;
- Concern at the loss of agricultural producing land in the area;
- Has the impact upon agricultural production been factored into the cost benefit analysis of the Scheme;

- f. Will the land used for the Scheme return to agricultural use post-development;
- g. Technological advancements might make the Scheme an inefficient use of the land;
- h. The scale of the Scheme may impact upon the ability of local authorities to deliver future housing and employment growth;
- i. The cumulative impact of solar developments in the area on land use;
- j. Brexit has raised the importance of local agricultural production to guarantee food security;
- k. The development of the Scheme should not impact upon the delivery of the Cambridgeshire Autonomous Metro;
- l. Concern at potential job losses as a result of the change in land use;
- m. Effective land management through agricultural use can store carbon, and,
- n. The Scheme should go further than providing new permissive routes and should instead look to establish new PRow.

6.2.9 The Applicant has had regard to all comments relating to land use in **Appendix J-1** and **Appendix J-2**. With regard to the matters raised in 6.2.8 above, the Applicant has set out its approach in **Table 6-2** below.

6.2.10 All existing PRow within the Scheme boundary are retained and will remain accessible during the operational phases of the Scheme. The Applicant is proposing to temporarily close some PRow during construction. The PRow would be closed for the shortest timeframe necessary. The Environmental Statement [EN010106/APP/6.1] assumes as a worst-case scenario that each PRow will be closed for up to three weeks during the construction phase. When a PRow is closed, there are alternative options available in the local area. Diversion routes will be identified and signs indicating those routes provided for all users.

6.2.11 The Applicant has undertaken a detailed assessment of agricultural land classification within the Order Limits in line with Natural England TIN049. The findings of this assessment and details of how the assessment has been undertaken can be found in Appendix 12B Soils and Agriculture Baseline Report of the Environmental Statement [EN010106/APP/6.2].

6.2.12 The DCO will require that the Scheme is decommissioned after 40 years of operation, and that requirement will be enforceable through the Planning Act 2008 against the person with the benefit of the Order at that time. A Framework Decommissioning Environmental Management Plan (DEMP) has been prepared and is presented in Appendix 16E of the Environmental Statement [EN010106/APP/6.2] which provides the outline mitigation measures to be adhered to during decommissioning. The DCO includes a requirement in Schedule 2 requiring the preparation and approval of the DEMP substantially in accordance with the Framework DEMP, and for the approved DEMP to be implemented. That requirement is also enforceable through the Planning Act 2008. These measures will ensure that at the end of the Scheme's operating life, it will be decommissioned and

the land returned to its previous use. In this case, the land would return to use as agricultural land.

6.2.13 Section 12.11 "Cumulative Effects" of Chapter 12 of the Environmental Statement [EN010106/APP/6.1] has assessed the potential effects of the Scheme in combination with the potential effects of other development schemes within the surrounding area for each impact in each respective phase (construction, operation and decommissioning).

Table 6-2 Regard had to comments received from Section 42(1)(a) and (b) consultation relating to land use

Matter raised	Regard had to comment by the Applicant
Mitigation should be incorporated to improve PRow in and around the sites	<p>All existing PRow within the Scheme boundary are retained and will remain accessible during the operational phases of the Scheme.</p> <p>The Applicant is proposing to temporarily close some PRow during construction. The PRows would be closed for the shortest timeframe necessary. The Environmental Statement [EN010106/APP/6.1] assumes as a worst-case scenario that each PRow will be closed for up to three weeks during the construction phase. When a PRow is closed, there are alternative options available in the local area. Diversion routes will be identified and signs indicating those routes provided for all users.</p> <p>Views from PRows during construction will be affected, in a number of cases there will be significant effects on views during construction due to machinery presence. These effects are described and detailed in Chapter 10 of the ES [EN010106/APP/6.1]. The overall effect on amenity on PRow users during construction from noise and visual impacts as well as PRow closures (effect interactions) is assessed in Chapter 17 of the ES [EN010106/APP/6.1]. No significant effects are predicted from these effect</p>

Matter raised	Regard had to comment by the Applicant
	<p>interactions on users.</p> <p>The Scheme proposes new permissive routes; at Beck Road, to the north-west of Sunnica East Site A; south of Freckenham Road, to the north-east of Sunnica East Site B (two new routes intersecting the existing diagonal unclassified bridleway U6006); and on Elms Road, to the south of Sunnica East Site B.</p> <p>Views from PRow during operation will also be affected, in a number of cases there will significant effects (see Chapter 10 of the ES [EN010106/APP/6.1]). These effects are expected to reduce over time as the vegetation planting intended for screening of the Scheme matures.</p>
<p>Doubt over the Applicant's assessment of agricultural land quality</p>	<p>The Applicant has undertaken a detailed assessment of agricultural land classification within the Order Limits in line with Natural England TIN049. The findings of this assessment and details of how the assessment has been undertaken can be found in Appendix 12B Soils and Agriculture Baseline Report of the Environmental Statement [EN010106/APP/6.2].</p>
<p>Create alternative PRow during the construction phase of the project to compensate for any impact on existing routes</p>	<p>The Applicant has assessed the impacts of the closure of PRow during the construction phase of the Scheme. The PRow will closure will be minimised as far as possible and the ES has assessed that there will be for a maximum of three weeks each during construction. As the PRow's will be closed for a short duration (maximum of 3 weeks) no diversions have been proposed, rather alternative options are available in the local area and diversion signs indicating those routes will be</p>

Matter raised	Regard had to comment by the Applicant
	<p>provided.</p> <p>Further details can be found in chapters 12 and 13 of the Environmental Statement [EN010106/APP/6.1] and the Framework Construction Environmental Management Plan included at Appendix 16C [EN010106/APP/6.2].</p>
<p>Concern at the loss of agricultural producing land in the area</p>	<p>The Applicant has undertaken an assessment of the land used for the Scheme. In line with the requirements of the National Planning Policy Framework (NPPF), the Applicant has sought to avoid using agricultural land considered to be 'best and most versatile' (grades 1, 2 and 3a). Based on our assessments, the majority of the land (96.2%) proposed for use within the Sites is classed as not being 'best and most versatile' and is predominantly grades 3b and 4. The Applicant does not consider this to be an 'unfair assessment'. The proposed Sunnica Energy Farm will rest the land for a period of time and provide a much-needed new source of renewable energy generation. Full details of this assessment can be found in Appendix 12B Soils and Agriculture Baseline Report of the Environmental Statement [EN010106/APP/6.2]. Assessment of the agricultural land quality and versatility follows Natural England Guidance given in TIN049.</p> <p>The change in agricultural land-use within the Order limits and any direct effects due to this are analysed in Chapter 12 of the Environmental Statement [EN/1010106/APP/6.1].</p>
<p>Has the impact upon agricultural production been factored into the cost benefit analysis of the Scheme?</p>	<p>The Applicant has undertaken an assessment of the land used for the Scheme. In line with the requirements of the National Planning Policy Framework</p>

Matter raised	Regard had to comment by the Applicant
	<p>(NPPF), the Applicant has sought to avoid using agricultural land considered to be 'best and most versatile' (grades 1, 2 and 3a). Based on our assessments, the majority of the land (96.2%) proposed for use within the Sites is classed as not being 'best and most versatile' and is predominantly grades 3b and 4. The proposed Sunnica Energy Farm will rest the land for a period of time and provide a much-needed new source of renewable energy generation. Full details of this assessment can be found in Appendix 12B Soils and Agriculture Baseline Report of the Environmental Statement [EN010106/APP/6.2]. Assessment of the agricultural land quality and versatility follows Natural England Guidance given in TIN049.</p> <p>The scope of the Environmental Impact Assessment (EIA), further to the issue of the Scoping Opinion by the Planning Inspectorate (ES Appendix 1B [EN/1010106/APP/6.2]) does not include an assessment on food security. The Applicant recognises the role of the planning system to assess the balance of the impact of withdrawing land from agricultural production for a period of time against the benefits of renewable energy generation. A fallow period will allow recovery of soil organic matter and remediate deep compaction from cultivation. Non-food crops are already grown in this area and on land within the Sites, including crop maize for anaerobic digesters and forage for the prominent local equestrian sector.</p> <p>The change in agricultural land-use within the Order limits and any direct effects due to this are analysed in Chapter 12 of the Environmental</p>

Matter raised	Regard had to comment by the Applicant
	Statement [EN/1010106/APP/6.1].
Will the land used for the Scheme return to agricultural use post-development?	<p>The DCO will require that the Scheme is decommissioned after 40 years of operation, and that requirement will be enforceable through the Planning Act 2008 against the person with the benefit of the Order at that time. A Framework Decommissioning Environmental Management Plan (DEMP) has been prepared and is presented in Appendix 16E of the Environmental Statement [EN010106/APP/6.2] which provides the outline mitigation measures to be adhered to during decommissioning.</p> <p>The DCO includes a requirement in Schedule 2 requiring the preparation and approval of the DEMP substantially in accordance with the Framework DEMP, and for the approved DEMP to be implemented. That requirement is also enforceable through the Planning Act 2008.</p> <p>These measures will ensure that at the end of the Scheme's operating life, it will be decommissioned and the land returned to its previous use. In this case, the land would return to use as agricultural land.</p>
Technological advancements might make the Scheme an inefficient use of the land	The Applicant notes the importance of incorporating suitable flexibility within its proposed DCO and is doing so to ensure that it is able to take advantage of advances in technology to maximise the benefits of the proposed Scheme during its operating life. This flexibility will however be within the parameters assessed as part of the ES [EN010106/APP/6.1].
The scale of the Scheme may impact upon the ability of local authorities to	The Applicant has considered the potential impact of the proposed

Matter raised	Regard had to comment by the Applicant
<p>deliver future housing and employment growth</p>	<p>Scheme on the councils' aspirations to deliver future housing and employment growth in Chapter 12 Socioeconomics and Land Use within the ES [EN010106/APP/6.1] and the Planning Statement [EN010106/APP/7.2].</p> <p>An assessment of the agricultural quality and versatility for the Scheme on the developable land has been undertaken by the Applicant and has been provided in Chapter 12 of the Environmental Statement [EN010106/APP/6.1]. The Applicant understand that the Council will undertake its own assessments in bringing forward its Local Plan for development outside of the Scheme area.</p>
<p>The cumulative impact of solar developments in the area on land use</p>	<p>Section 12.11 "Cumulative Effects" of Chapter 12 of the Environmental Statement [EN010106/APP/6.1] has assessed the potential effects of the Scheme in combination with the potential effects of other development schemes within the surrounding area for each impact in each respective phase (construction, operation and decommissioning). This includes construction employment, operation employment, PRow's and impacts to residential properties, business premises and community facilities in the surrounding area. The Applicant recognises that is the role of the planning system to assess the balance of the impact of withdrawing land from agricultural production for a period of time against the benefits of renewable energy generation.</p>
<p>Brexit has raised the importance of local agricultural production to guarantee</p>	<p>The Applicant has undertaken an assessment of the land used for the Scheme. In line with the requirements of</p>

Matter raised	Regard had to comment by the Applicant
food security	<p>the NPPF, the Applicant has sought to avoid using agricultural land considered to be 'best and most versatile' (grades 1, 2 and 3a). Based on our assessments, the land proposed for use within the Order Limits is not 'best and most versatile' and is predominantly grades 3b and 4. The proposed Sunnica Energy Farm will rest the land for a period of time and provide a much-needed new source of renewable energy generation. Full details of this assessment can be found in Chapter 12: Socio-economics of the Environmental Statement [EN010106/APP/6.1].</p> <p>The scope of the Environmental Impact Assessment (EIA), further to the issue of the Scoping Opinion by the Planning Inspectorate (ES Appendix 1B [EN/1010106/APP/6.2]) does not include an assessment on food security. The Applicant recognises the role of the planning system to assess the balance of the impact of withdrawing land from agricultural production for a period of time against the benefits of renewable energy generation. A fallow period will allow recovery of soil organic matter and remediate deep compaction from cultivation. Non-food crops are already grown in this area and on land within the Sites, including crop maize for anaerobic digesters and forage for the prominent local equestrian sector.</p>
The development of the Scheme should not impact upon the delivery of the Cambridgeshire Autonomous Metro	The Applicant has engaged with the Cambridgeshire and Peterborough Combined Authority following the statutory consultation to discuss proposals for the Scheme in relation to the Cambridge Autonomous Metro.
Concern at potential job losses as a	The existing Order limits is agricultural

Matter raised	Regard had to comment by the Applicant
result of the change in land use	<p>land, and there is expected to be no employment loss as a result of the Scheme; however, there may be some temporary farming jobs which will no longer be offered. This has been estimated to be close to two FTE jobs related to agricultural activities based on information provided by the landowners to the promoter. Considering these are not permanent jobs which are being lost, the 'deadweight' employment has been assessed as one permanent job will be lost. 'Deadweight' refers to outcomes which would have occurred without intervention such as if the Scheme were to result in a disruption to any existing economic activity currently occurring in relation to the Order limits.</p> <p>The creation of jobs has been assessed within the operational employment section of the Chapter 12 of the Environmental Statement [EN010106/APP/6.1]. Further information regarding the provision of training opportunities is provided within the outlined in the Outline Skills, Supply Chain and Employment Plan [EN010106/APP/7.8].</p>
Effective land management through agricultural use can store carbon	<p>Calculations undertaken by the Applicant in relation to carbon sequestration considered both the current and proposed future land uses. As outlined in Chapter 6 Climate Change of the Environmental Statement [EN010106/APP/6.1], land use change as a result of the Scheme is anticipated to have a temporary beneficial GHG impact of around 100,000 tonnes carbon dioxide equivalent (tCO₂e), largely due to the conversion of large areas of cropland to grassland, which has a higher carbon sequestration value than cropland.</p>

Matter raised	Regard had to comment by the Applicant
<p>The Scheme should go further than providing new permissive routes and should instead look to establish new PRoW</p>	<p>The Applicant is not able to provide dedicated PRoW through the Scheme as the ability to create such rights is not contained within the Applicant's land agreements. Further information on this is provided within the Statement of Reasons [EN010106/APP/4.1] and the Book of Reference [EN010106/APP/4.3].</p> <p>The Applicant is proposing permissive routes for the duration of the Scheme's lifetime to provide additional recreational opportunities. The aim of this is to mitigate impacts caused by the construction and operation of the Scheme. Following the end of the Scheme's operating life and decommissioning, such impacts will no longer exist and therefore the accompanying mitigation through the permissive routes will no longer be required.</p>

Need

6.2.14 Consultees that provided substantive comments relating to the need for the Scheme included:

- | | |
|---|--|
| <ul style="list-style-type: none"> a. Barton Mills Parish Council; b. Chippenham Parish Council; c. Freckenham Parish Council; d. Isleham Parish Council; e. Snailwell Parish Council; | <ul style="list-style-type: none"> f. Suffolk County Council; g. West Suffolk Council; h. Cambridgeshire County Council; and, i. East Cambridgeshire District Council. |
|---|--|

6.2.15 The matters most commonly raised by the above consultees included:

- a. Support for more means of renewable energy generation;
- b. Why does the Scheme need to be so large?;
- c. The BESS element of the Scheme is to be used for energy trading and the need for this is questionable;

- d. The Scheme is inefficient when compared to other methods of renewable energy generation such as wind power, and,
- e. Development of wind power will allow the UK to meet its electricity needs without the need to develop large scale solar.

6.2.16 The Applicant has had regard to the feedback received through both the non-statutory consultation and statutory consultation. Details of how this has influenced the design of the Scheme can be found in the Design and Access Statement [EN010106/APP/7.3].

6.2.17 The Applicant has set out the importance of building projects at this scale in the Statement of Need [EN010106/APP/7.1]. The Applicant has identified that there are benefits created by larger, single, solar projects in being able to deliver low carbon electricity more quickly and at a lower cost than multiple independent schemes which make up the same generating capacity.

6.2.18 The Applicant is of the view that the Scheme is not an alternative to other methods of electricity generation, such as wind power, but will compliment such forms of generation in providing much needed new renewable energy to the national electricity grid.

6.2.19 The Applicant has had regard to all comments relating to need in **Appendix J-1** and **J-2**. Within **Appendices J-1 and J-2**, these comments are grouped under the 'Land use' and 'Renewable energy' topic areas. With regard to the matters raised in 6.2.15 above, the Applicant has set out its approach in **Table 6-3** below.

Table 6-3 Regard had to comments received from Section 42(1)(a) and (b) consultation relating to need

Matter raised	Regard had to comment by the Applicant
Support for more means of renewable energy generation	<p>The Applicant is proposing the Scheme in response to the urgent national need for new, renewable, forms of energy generation.</p> <p>The Applicant has provided a Statement of Need [EN010106/APP/7.1] as part of its DCO application setting out the need for the Sunnica Energy Farm in the context of the need for renewable energy generation more widely.</p>
Why does the Scheme need to be so large?	<p>The Applicant is proposing a project of this size to meet a national need for new forms of renewable energy generation. As the United Kingdom is aiming to meet its net zero climate</p>

Matter raised	Regard had to comment by the Applicant
	<p>obligations and to replace older forms of energy generation, projects of this kind are required to provide clean forms of energy generation to the national electricity grid. Further details of the need for the proposed Sunnica Energy Farm are provided in the Statement of Need [EN010106/APP/7.1]. Within the Statement of Need, the Applicant has identified that there are benefits created by larger, single, solar projects in being able to deliver low carbon electricity more quickly and at a lower cost than multiple independent schemes which make up the same generating capacity.</p>
<p>The BESS element of the Scheme is to be used for energy trading and the need for this is questionable</p>	<p>The Applicant is proposing the Scheme in response to the urgent national need for new, renewable, forms of energy generation. The battery storage element of the Scheme will provide a complementary suite of services to the solar PV element. These services will include a crucial grid balancing role. Further information on this is provided in the Statement of Need [EN010106/APP/7.1].</p>
<p>The Scheme is inefficient when compared to other methods of renewable energy generation such as wind power</p>	<p>The Applicant respectively disagrees with this assessment. The Applicant has provided a Statement of Need [EN010106/APP/7.1] as part of its DCO application setting out the relevance of the project in the context of the need for new renewable energy generation more widely. This includes details of why solar energy generation is efficient and suitable in Great Britain, including when compared against many other forms of conventional and renewable energy generation. As set out in the Statement of Need, solar projects of this scale bring important benefits in helping the country to meet its legal commitment to decarbonise, especially within the</p>

Matter raised	Regard had to comment by the Applicant
	important 2020s timeframe.
Development of wind power will allow the UK to meet its electricity needs without the need to develop large scale solar	<p>The Applicant is of the view that the Scheme is not an alternative to wind powered energy generation but will compliment such forms of generation in providing much needed new renewable energy to the national electricity grid.</p> <p>The Applicant has provided a Statement of Need [EN010106/APP/7.1] as part of its DCO application setting out the relevance of the project in the context of the need for new renewable energy generation more widely.</p> <p>Further information on how the Applicant has considered alternative sites, including alternative technologies, can be found in Chapter 4: Alternatives and Design Evolution of the Environmental Statement [EN010106/APP/6.1].</p>

Design

6.2.20 Comments relating to design have been analysed according to the different aspect of the Scheme to which they refer. This includes: the Scheme as a whole, Sunnica East Site A and Site B, Sunnica West Site A and Site B, the cable route and the grid connection point at Burwell.

The whole Scheme

6.2.21 Consultees that provided substantive comments relating to the Scheme design as a whole included:

- | | |
|--|-------------------------------------|
| a. Suffolk County Council; | e. National Grid; |
| b. West Suffolk Council; | f. Snailwell Parish Council; |
| c. Cambridgeshire County Council; | and, |
| d. East Cambridgeshire District Council; | g. The Health and Safety Executive. |

6.2.22 The matters most commonly raised by the above consultees included:

- a. The proposed Scheme is too large;

- b. There needs to be additional information provided as to how local people have inputted into the Scheme's design;
- c. The need to provide clarity over the security measures that will be used;
- d. The proposed Battery Energy Storage System (BESS) presents a fire risk;
- e. The BESS is too dangerous to be located close to residential areas;
- f. Provide details of the predicted peak electricity generation of the Scheme;
- g. Concern that larger fields in the design increase access problems;
- h. Incorporate easements for existing local infrastructure;
- i. Concern at the use of floodlighting around the Scheme perimeter;
- j. A colour study should be undertaken to inform the Scheme design and mitigation; and,
- k. Will temporary accommodation be provided on site?

6.2.23 The Applicant has continued developing the design of the Scheme following the Statutory Consultation. These changes have resulted in the total developable area of the project (the area where the infrastructure for the proposed Sunnica Energy Farm will be located: solar PV, battery energy storage, and cabling) being reduced. An updated description of the Scheme can be found in Chapter 3: Scheme Description of the ES [EN010106/APP/6.1].

6.2.24 The Applicant has provided plans showing the updated Scheme layout in the parameter plans (figures 3-1 and 3-2) of the ES [EN010106/APP/6.3].

6.2.25 The Applicant has had regard to all comments relating to whole scheme design in **Appendix J-1** and **Appendix J-2**. With regard to the matters raised in 6.2.22 above, the Applicant has set out its approach in **Table 6-4** below.

Table 6-4 Regard had to comments received from Section 42(1)(a) and (b) consultation relating to whole scheme design

Matter raised	Regard had to comment by the Applicant
The proposed Scheme is too large	The need for the Scheme is set out in the Statement of Need [EN010106/APP/7.1]. This demonstrates that there is a need for a Scheme of this size. In response to feedback received during the statutory consultation, the Applicant has made a number of design changes, which have resulted in the total developable area of the project (the area where the

Matter raised	Regard had to comment by the Applicant
	<p>infrastructure for the proposed Sunnica Energy Farm will be located: solar PV, battery energy storage, and cabling) being reduced. Further information on this is provided in Chapter 3: Scheme Description and Chapter 4: Alternatives and Design Evolution of the Environmental Statement [EN010106/APP/6.1].</p>
<p>There needs to be additional information provided as to how local people have inputted into the Scheme's design</p>	<p>The Applicant considers the proposal to be appropriately sited and has amended the Sunnica Energy Farm design in response to the results of its environmental surveys and feedback received through the statutory consultation.</p> <p>As set out in Chapter 5 of this report, these changes include:</p> <p>Removing parcels E11 and E23 from solar development to set the Sunnica Energy Farm back from Worlington. These parcels now form part of the area marked ECO3 in Figure 3-1 of the ES [EN010106/APP/6.3].</p> <p>Removing parcel E07 from solar development to reduce the landscape and visual impact of the Sunnica Energy Farm for people travelling between Freckenham and Isleham. This parcel now forms the area ECO2 in Figure 3-1 of the ES [EN010106/APP/6.3].</p> <p>In addition to this, the Applicant has removed parcels W13, W14 and W16 (shown in figure 4-5 of the ES [EN010106/APP/6.3]) from the Order limits which in total means that the Scheme has reduced in size.</p> <p>Further information on how the Applicant has considered the local and national planning context when</p>

Matter raised	Regard had to comment by the Applicant
	<p>choosing the Sunnica Energy Farm sites is provided in Chapter 4 - Alternatives and Design Evolution of the Environmental Statement [EN010106/APP/6.1], and the Planning Statement [EN010106/APP/7.2]. Detail of how the Applicant has had regard to responses received through the consultation can be found in Chapter 5 of the Consultation Report.</p>
<p>The need to provide clarity over security measures that will be used.</p>	<p>The Applicant takes the issue of security seriously and has considered this within its proposal. More details as to the types of perimeter fencing to be provided around each type of infrastructure can be found within Chapter 3 - Scheme Description [EN010106/APP/6.1]. In terms of security normally the perimeter fencing of the plant is sufficient as this has CCTV and only qualified personnel can enter in the proposed Sunnica Energy Farm. However, the substations normally have other specific fencing, and this is identified in the indicative layout plans and cross sections. Regarding the solar stations, only the outdoor transformer needs a specific fence, the inverters and the switchgear doesn't need it. The BESS compound can also have security fencing around it similar to that for the solar stations and the onsite substations. This will need to take into account fire safety.</p>
<p>The proposed Battery Energy Storage System (BESS) presents a fire risk</p>	<p>The Applicant has prepared an Outline Battery Fire Safety Management Plan [EN010106/APP/7.6] as part of its DCO application. This Plan has been developed in consultation with the local fire authorities. Subject to the Scheme receiving development consent, this Plan will be updated following detailed design, and requires the approval of the</p>

Matter raised	Regard had to comment by the Applicant
	<p>relevant planning authorities prior to the beginning of construction of the BESS. The relevant planning authorities are required to consult with the Health and Safety Executive, and Fire and Rescue Services before determining whether to approve the Plan.</p>
<p>The BESS is too dangerous to be located close to residential areas.</p>	<p>The Applicant recognises how important it is to ensure that the BESS is safe including with reference to acceptable distance to residential properties. The Applicant has embedded mitigation in relation to acceptable safe distances from residential properties within the Sunnica Energy Farm design and the Applicant has submitted an Outline Battery Fire Safety Management Plan [EN010106/APP/7.6] with the DCO. This outline plan sets out how the Scheme proposes to mitigate and manage the potential fire risk posed by the BESS. The batteries will be housed within containers. These containers may be modular and joined depending on equipment choice to be determined at detailed design stage. Each BESS container will be fitted within an automatic sprinkler or water mist system for fire suppression in the event of an unplanned fire. The water supply for this system will be integrated into the design of each BESS container and located either internally or externally (centralised or decentralised) to each BESS. The containment of this water would be within a sump integrated into the BESS container. Each BESS area requires water storage for use by fire fighters in case of a fire in the BESS compound. In addition, an Unplanned Atmospheric Emissions from Battery Energy Storage Systems (BESS) Assessment is included within Appendix 16D of the Environmental Statement</p>

Matter raised	Regard had to comment by the Applicant
	<p>[EN010106/APP/6.2]. The assessment has determined that even in the unlikely scenario that all the safety systems fail and a large scale fire breaks out within one of the BESS containers then the resultant hydrogen fluoride concentration at the closest receptors would be below the level that Public Health England has identified as resulting in notable discomfort to members of the general population.</p>
<p>Provide details of the predicted peak electricity generation of the Scheme.</p>	<p>The Applicant did not provide details of the Scheme's generating capacity at the PEIR stage because improvements in technology could mean that the Sunnica Energy Farm has the potential to generate additional renewable electricity during its operating life than that outlined during the Scoping Opinion stage. It would not therefore make sense for the Applicant to be tied to a generating capacity that could prove less efficient in the future. Such an approach is common across longer term renewable energy projects and the Applicant has not specified a generating capacity in the Draft DCO [EN010106/APP/3.1] submitted as part of its DCO application. The development (including of the solar generating station and BESS) will instead be controlled and limited by the DCO requirements, areas shown on the works plans, design principles (which include maximum parameters) and impacts assessed in the ES.</p> <p>An assumption has been made as to the annual production from the site in terms of kWh in order to calculate the potential impact on the climate. Details of this calculation can be found within Chapter 6 - Climate Change of the Environmental Statement</p>

Matter raised	Regard had to comment by the Applicant
	[EN010106/APP/6.1].
Concern that larger fields in the design increase access problems.	<p>A suite of specialist reports has been undertaken by the Applicant to assess the potential impacts resulting from the Scheme. These include an assessment of construction traffic regarding the Scheme which is included within Chapter 13: Transport and Access of the Environmental Statement [EN010106/APP/6.1] and also within the Transport Assessment in Appendix 13B of the Environmental Statement [EN010106/APP/6.2]. The Framework CTMP and Travel Plan in Appendix 13C of the Environmental Statement [EN010106/APP/6.2] identifies how the HGVs and staff vehicles will be managed during construction.</p> <p>A Framework Construction Environmental Management Plan (CEMP) has been produced and submitted as part of the DCO (Appendix 16C of the Environmental Statement [EN010106/APP/6.2]). This details mitigation measures that would be adopted during construction to minimise disruption and environmental impacts during construction.</p>
Incorporate easements for existing local infrastructure.	The Applicant has continued to engage with a number of consultees following the statutory consultation, including National Grid Gas and Cadent Gas. Discussions in relation to protective provisions are ongoing.
Concern at the use of floodlighting around the Scheme perimeter.	The Scheme will not be lit, with the exception of security lighting at the Battery Energy Storage System (BESS) and compound locations. However, during operation of the Scheme this will be motion detected and only required when undertaking maintenance. Dark corridors for crepuscular and nocturnal species will

Matter raised	Regard had to comment by the Applicant
	be maintained.
A colour study should be undertaken to inform the Scheme design and mitigation.	The importance of colour has been incorporated into the mitigation within the Outline Landscape and Ecology Management Plan (OLEMP) included at Appendix 10I of the ES [EN010106/APP/6.2] for the BESS to be rendered in a suitable colour which is sympathetic to the landscape. The details of this can be addressed at detail design.
Will temporary accommodation be provided on site?	The Applicant does not intend to make provision for any temporary living accommodation on site for staff. A detailed description of the Scheme is set out in Chapter 3 - Scheme Description [EN010106/APP/6.1] of the Environmental Statement.

Sunnica East Site A and Site B

6.2.26 Consultees that provided substantive comments relating to Sunnica East Site A and Site B included:

- | | |
|-----------------------------------|--|
| a. Anglian Water; | g. East Cambridgeshire District Council; |
| b. Freckenham Parish Council; | h. Snailwell Parish Council; |
| c. Isleham Parish Council; | and, |
| d. Suffolk County Council; | i. West Row Parish Council. |
| e. West Suffolk Council; | |
| f. Cambridgeshire County Council; | |

6.2.27 The matters most commonly raised by the above consultees included:

- The solar sites are located too close to neighbouring villages;
- Incorporate additional woodland to southern and eastern boundaries of the sites;
- Field E23 should be removed from the Scheme to avoid habitats and the Scheme should avoid existing habitats more widely;

- d. Fencing should be set away from the U6006 green lane route;
- e. The scale of the site makes it difficult to integrate into the existing landscape;
- f. The ecological mitigation identified in the non-developed areas does not appear to fit together and should be designed to form a coherent network of habitats;
- g. The developable area for solar development encroaches too close to Isleham;
- h. Any screening needs to be well designed and to include trees that fit with the local area; and,
- i. The Scheme should not inhibit long term proposals to grow Mildenhall.

6.2.28 The Applicant has had regard to all comments relating to Sunnica East design in **Appendix J-1** and **Appendix J-2**. With regard to the matters raised in 6.2.27 above, the Applicant has set out its approach in **Table 6-5** below.

6.2.29 The Applicant has considered the above comments and, in response, has made a number of amendments to the Scheme design including:

- a. Fields E07, E11 and E23 (shown in the parameter plan in figure 4-4 of the ES [EN010106/APP/6.3]) are no longer proposed to be used for solar development. This sets the Scheme further away from Isleham and Worlington;
- b. Fencing is being set away from existing public rights of way (PRoW) and will be behind any planting provided to screen the Scheme from visual receptors;
- c. The area proposed for PV modules and BESS of Sunnica East Site A and Site B has been reduced in size; and,
- d. Easement corridors have been incorporated into the Scheme design for existing utilities through further consultation with the providers where necessary.

Table 6-5 Regard had to comments received from Section 42(1)(a) and (b) consultation relating to Sunnica East design

Matter raised	Regard had to comment by the Applicant
The solar sites are located too close to neighbouring villages.	The Applicant considers the proposal to be appropriately sited and has amended the Sunnica Energy Farm design in response to the results of its environmental surveys and feedback received through the statutory consultation. As set out in Chapter 5 of

Matter raised	Regard had to comment by the Applicant
	<p>this Consultation Report, these changes include:</p> <p>Removing parcels E11 and E23 from solar development to set the Sunnica Energy Farm back from Worlington. These parcels now form part of area ECO3 shown in Figure 3-1 of the ES [EN010106/APP/6.3].</p> <p>Removing parcel E07 from solar development to reduce the landscape and visual impact of the Sunnica Energy Farm for people travelling between Freckenham and Isleham. This area now forms an ecological mitigation area, ECO2 which is also shown in Figure 3-1 of the ES [EN010106/APP/6.3].</p> <p>In addition to this, the Applicant has removed parcels W13, W14 and W16 (as shown in figure 4-5 of the ES [EN010106/APP/6.3]) from the Order limits which in total means that the Scheme has reduced in size.</p> <p>Further information on how the Applicant has considered the local and national planning context when choosing the Sunnica Energy Farm sites is provided in Chapter 4 - Alternatives and Design Evolution of the Environmental Statement [EN010106/APP/6.1], and the Planning Statement [EN010106/APP/7.2].</p>
<p>Incorporate additional woodland to southern and eastern boundaries of the sites.</p>	<p>In response to feedback received through the statutory consultation, parcel E07 on the west side of Beck Road is no longer proposed for solar development (renamed ECO2). New woodland is proposed to the east of Beck Road to screen development within the grounds of Lee Farm. The Applicant's revised Scheme proposals are set out on the Works</p>

Matter raised	Regard had to comment by the Applicant
	Plans [EN010106/APP/2.2] and Outline Landscaping and Ecological Management Plan (Appendix 10I of the ES [EN010106/APP/6.2]) and can also be viewed in the parameter plans included in the Environmental Statement, figures 3-1 and 3-2 [EN010106/APP/6.3].
Field E23 should be removed from the Scheme to avoid habitats and the Scheme should avoid existing habitats more widely.	The area marked E23 in the parameter plans is no longer proposed for solar development following consultation with various consultees and advice from ecologists. This area will now form part of the ecological mitigation area ECO3, which will be planted with native grassland. ECO3 is shown in Parameter plans (Figure 3-1, included within the Environmental Statement [EN010106/APP/6.3]). Further details as to the establishment of stone curlew plots are set out in the Outline Landscape and Ecology Management Plan, Appendix 10I of the Environmental Statement [EN010106/APP/6.2].
Fencing should be set away from the U6006 green lane route.	The Applicant has considered the impact of the Scheme on sequential views when moving between local settlements and around Worlington. The design included setbacks from the road networks, the U6006 and from Worlington. The extent of these setbacks has been increased following the consultation. With reference to the parameter plans in the Environmental Statement [EN010106/APP/6.3], parcels E11 and E23 are no longer proposed for solar development and will be for ecological mitigation and additional offsets from Worlington. These parcels now form part of the area marked ECO3 in Figure 3-1 of the ES [EN010106/APP/6.3]. ECO3 will also reduce the extent of panels in relation to

Matter raised	Regard had to comment by the Applicant
	<p>U6006. A new permissive path has been included across Sunnica East Site B, to provide access from Red Lodge to Worlington and Golf Links Road, via the U6006.</p>
<p>The scale of the site makes it difficult to integrate into the existing landscape.</p>	<p>The Applicant has further refined the Scheme design in response to feedback received through the statutory consultation to reduce the extent of development. At Sunnica West A the extent of panels has been reduced in relation to La Hogue Road and the B1085, via the removal of W13 and W14 (shown in the parameter plan in figure 4-5 of the ES [EN010106/APP/6.3]). The set back of solar panels from La Hogue Road has also increased to enable more planting in combination with the overall retention of the roadside hedgerows. At Sunnica East A solar modules are no longer proposed to the west of Beck Road, so fields remain between Freckenham and Isleham via ECO1 and ECO2. At Sunnica East B, the extent of modules in proximity to U6006 has been reduced, with E11 and E23 now no longer proposed for solar development. These areas now form part of the area ECO3 shown on Figure 3-1 of the ES [EN010106/APP/6.3]. The incorporation of ECO3 increases the set back of panels from Worlington and West Row. There have also been additional setbacks and planting around the proposed BESS at E18 and E33. These areas are also shown on Figure 3-1 of the ES [EN010106/APP/6.3]. The Scheme includes new planting and suitable rendering of the BESS to aid in reducing the overall visibility of the modules, such that there is visual mitigation such that the Scheme is able to be integrated into the landscape and</p>

Matter raised	Regard had to comment by the Applicant
	impacts mitigated for Freckenham and Worlington. The results of this Assessment and details of the Applicant's proposed mitigation are included in Chapter 10 of the Environmental Statement [EN010106/APP/6.1].
The ecological mitigation identified in the non-developed areas does not appear to fit together and should be designed to form a coherent network of habitats.	The undeveloped areas where habitat creation will be undertaken form a coherent and connected network of habitats, which deliver for biodiversity. These areas are shown on the parameter plans (figures 3-1 and 3-2 of the Environmental Statement [EN010106/APP/6.3]) and will be secured through the Landscape and Ecology Management Plan. An Outline Landscape and Ecology Management Plan has been provided in Appendix 10I of the Environmental Statement [EN010106/APP/6.2].
The developable area for solar development encroaches too close to Isleham.	<p>The modules are set back from Isleham, the nearest of which would be approximately 550m from residential areas and 450m from the Ark Church in Isleham. Modules will be set back with a grassland buffer and screened with woodland planting. The proposed planting is considered to reflect the character of trees and vegetation at Beck Bridge, adjacent to the Lee Brook and to the south of Isleham, at Isleham nature reserve, adjacent to the B1104, to the south of Isleham.</p> <p>The Works Plans [EN010106/APP/2.2] show the limits of land within the Order limits on which it is proposed to develop solar PV modules, together with the land which would be used for screening and planting.</p>
Any screening needs to be well	The Applicant's proposals to mitigate

Matter raised	Regard had to comment by the Applicant
designed and to include trees that fit with the local area.	<p>the visual impact of the proposed Sunnica Energy Farm have been designed following a number of assessments and through engagement with relevant stakeholders including the local authorities, accounting for the local landscape character. Further information on the Applicant's proposals for landscape and visual mitigation can be found in Section 10.6 of Chapter 10: Landscape and Visual Amenity in the Environmental Statement [EN010106/APP/6.1].</p> <p>The Applicant is proposing embedded visual and landscape mitigation, the details of which can be found in Appendix 10I: Outline Landscape and Ecology Management Plan (LEMP) of the Environmental Statement [EN010106/APP/6.2].</p>
The Scheme should not inhibit long term proposals to grow Mildenhall.	<p>The Applicant has carried out an assessment of cumulative traffic impacts, taking into account development planned at Mildenhall. Further information can be found in the Applicant's Transport Assessment (Appendix 13B of the Environmental Statement [EN010106/APP/6.2]).</p> <p>The Applicant has considered the local planning context within the Planning Statement. The Scheme has been brought forward in knowledge of the future development of Mildenhall and the Applicant does not view the Scheme as representing a constraint to this future growth.</p>

Sunnica West Site A and Site B

6.2.30 Consultees that provided substantive comments relating to Sunnica West Site A and Site B included:

- a. Historic England;
- b. Kennett Parish Council;

- c. Suffolk County Council;
- d. West Suffolk Council;
- e. Cambridgeshire County Council;
- f. East Cambridgeshire District Council;
- g. Natural England; and,
- h. Snailwell Parish Council.

6.2.31 The matters most commonly raised by the above consultees included:

- a. Buffer zones should be incorporated between the Scheme and the Chippenham Park Registered Park and Garden;
- b. The Applicant should consider the impacts that the Scheme could have on the neighbouring Kennett Garden Village;
- c. The Scheme encroaches too close to the Avenue at Chippenham Park;
- d. The adjacent area of county wildlife importance should be retained in full;
- e. Sunnica West Site A is a large area of uninterrupted area solar development; and,
- f. The solar sites are too large to integrate into the landscape.

6.2.32 The Applicant has considered the comments received and, in response, has made the following amendments to Sunnica West Site A and Site B:

- a. Field W13 (shown in figure 4-5 of the ES [EN010106/APP/6.3]) has been removed from solar development and will help to mitigate any impact on Chippenham Park;
- b. The Scheme design has been revised in the area around the Avenue to incorporate greater setbacks with a new planting regime along the avenue at parcels W04 and W05 (shown in Figure 3-2 of the ES [EN010106/APP/6.3]);
- c. The developable area of Sunnica West Site A and Site B has been reduced, which includes setting back from Chippenham Park and residential dwellings in the area, and
- d. The fields marked W14 and W16 (shown in figure 4-5 of the ES [EN010106/APP/6.3]) are no longer proposed for inclusion within the Order limits, setting the Scheme back further from residential dwellings. The parcel shown as W15 on Figure 3-2 of the ES [EN010106/APP/6.3] has also been reduced in size to set it back from the field edges.

6.2.33 The Applicant has had regard to all comments relating to Sunnica West design in **Appendix J-1** and **Appendix J-2**. With regard to the matters raised in 6.2.32 above, the Applicant has set out its approach in **Table 6-6** below.

Table 6-6 Regard had to comments received from Section 42(1)(a) and (b) consultation relating to Sunnica West design

Matter raised	Regard had to comment by the Applicant
<p>Buffer zones should be incorporated between the Scheme and the Chippenham Park Registered Park and Garden.</p>	<p>The Applicant has revised the Scheme design in this area. Field W13 (shown in figure 4-5 of the ES [EN010106/APP/6.3]) has been removed from solar development and will help to mitigate any impact on Chippenham Park. The Applicant is also incorporating greater setbacks with a new planting regime along the avenue at parcels W04 and W05 (shown in Figure 3-2 of the ES [EN010106/APP/6.3]). The Works Plans [EN010106/APP/2.2] show the limits of land within the Order limits on which it is proposed to develop solar PV modules, together with the land which would be used for screening and planting.</p>
<p>The Applicant should consider the impacts that the Scheme could have on the neighbouring Kennett Garden Village.</p>	<p>Since the Preliminary Environmental Information Report, the Scheme design has been amended. W16 has now been removed and W15 has been reduced in size. Woodland planting has been designed along the edge of W15 to screen the views of panels from the future residents. Please refer to the parameter plans, as illustrated on figures 3-1 and 3-2 of the ES [EN010106/APP/6.3]. This has reduced the anticipated landscape and visual effects of the Scheme on residents within the future Kennett Garden Village.</p> <p>The Environmental Statement does not assess the impact on the future Kennett Garden Village. However, the future residents of the Garden Village have been considered in the design of the Scheme planting and landscape set backs.</p>
<p>The Scheme encroaches too close to</p>	<p>The Applicant has revised the Scheme</p>

Matter raised	Regard had to comment by the Applicant
the Avenue at Chippenham Park.	design in this area and is incorporating greater setbacks with a new planting regime along the avenue at parcels W04 and W05 (shown in Figure 3-2 of the ES [EN010106/APP/6.3]). The Works Plans [EN010106/APP/2.2] show the limits of land within the Order limits on which it is proposed to develop solar PV panels, together with the land which would be used for screening and planting.
The adjacent area of county wildlife importance should be retained in full.	Assuming that this response refers to arable flora of county importance within Sunnica West Site A, areas specifically managed for arable flora, i.e. disturbed plots, have been accounted for in to the Scheme design, where appropriate. These are detailed in the Outline Landscape and Ecology Management Plan (Appendix 10I of the Environmental Statement [EN010106/APP/6.2]).
Sunnica West Site A is a large area of uninterrupted area solar development.	<p>The Applicant has revised its Scheme proposals following the statutory consultation and has made changes to the Scheme design including removing parcels W13, W14 and W16 (shown in figure 4-5 of the ES [EN010106/APP/6.3]) from the Order limits.</p> <p>The Applicant has also incorporated greater setbacks within Sunnica West Site A at W11, W12 and W15 (shown in Figure 3-2 of the ES [EN010106/APP/6.3]) in relation to the local road networks to aid in reducing the perception of the Scheme. Existing vegetation, including woodlands and The Avenue are retained across Sunnica West Site A, along with areas of new native grassland (i.e. ECO4), so that there is not a continuous extent of</p>

Matter raised	Regard had to comment by the Applicant
	<p>solar panels.</p> <p>Parameter plans outlining the proposed changes can be found in the Environmental Statement Figures [EN010106/APP/6.2].</p> <p>The changes to the Parameter Plans discussed above are reflected in the Works Plans [EN010106/APP/2.2] for which the applicant seeks development consent.</p>
<p>The solar sites are too large to integrate into the landscape.</p>	<p>The Applicant has further refined the Scheme design in response to feedback received through the statutory consultation to reduce the extent of development. At Sunnica West A the extent of panels has been reduced in relation to La Hogue Road and the B1085, via the removal of W13 and W14 (shown in figure 4-5 of the ES [EN010106/APP/6.3]). The set back of solar panels from La Hogue Road has also increased to enable more planting in combination with the overall retention of the roadside hedgerows. The results of this assessment and details of the Applicant's proposed mitigation are included in Chapter 10 of the Environmental Statement [EN010106/APP/6.1].</p>

The cable route

6.2.34 Consultees that provided substantive comments relating to the cable route included:

- | | |
|---------------------------------------|--|
| a. Anglian Water; | e. Cambridgeshire County Council; |
| b. Chippenham Parish Council; | f. East Cambridgeshire District Council; |
| c. Cambridgeshire Local Access Forum; | g. Suffolk County Council; and, |
| d. Natural England; | h. West Suffolk Council. |

6.2.35 The matters most commonly raised by the above consultees included:

- a. Avoid impact on existing sewerage infrastructure;
- b. Any impact on Havacre Meadows and Deal Nook County Wildlife Site (CWS) should be avoided as much as possible, and,
- c. The cable route should be amended so that it avoids woodland and hedgerows wherever possible.

6.2.36 The Applicant has had regard to all comments relating to cable route design in **Appendix J-1** and **Appendix J-2**. With regard to the matters raised in 6.2.34 above, the Applicant has set out its approach in **Table 6-7** below.

Table 6-7 Regard had to comments received from Section 42(1)(a) and (b) consultation relating to cable route design

Matter raised	Regard had to comment by the Applicant
Avoid impact on existing sewerage infrastructure.	The Applicant has considered the potential impact of the Scheme on the identified asset and has further engaged with Anglian Water to discuss how adequate protective provisions can be incorporated into the project design. Details of this are included within the Draft DCO [EN010106/APP/3.1]. Further details of the Applicant's communications with Anglian Water can be found in the Statement of Reasons [EN010106/APP/4.1].
Any impact on Havacre Meadows and Deal Nook County Wildlife Site (CWS) should be avoided as much as possible.	A suitably qualified and experienced contractor will undertake all construction works. All construction activities will adhere to the measures set out in the Framework CEMP presented as Appendix 16C of the Environmental Statement [EN010106/APP/6.2]. Measures to mitigate impacts on Havacre Meadows and Deal Nook CWS will utilise well-established techniques which can be relied upon to avoid impacts.
The cable route should be amended so that it avoids woodland and hedgerows wherever possible.	The Applicant has amended the cable route corridor to avoid the woodland at Heath Plantation. This amendment can be viewed in the parameter plans

	included in the Environmental Statement Figures [EN010106/APP/6.3] and as secured through the limits of deviation shown on the Works Plans.
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Grid connection

6.2.37 Consultees that provided substantive comments relating to the grid connection included:

- | | |
|-----------------------------------|---|
| a. Suffolk County Council; | d. East Cambridgeshire District Council; and, |
| b. West Suffolk Council; | e. National Grid. |
| c. Cambridgeshire County Council; | |

6.2.38 The matters most commonly raised by the above consultees included:

- The cumulative impact of various energy projects that currently, or will in the future, connect to the national electricity grid at Burwell should be considered; and,
- Further information relating to the location of the proposed substation extension and cabling to the substation should be provided.

6.2.39 The Applicant has continued to develop its proposals for connecting to the electricity grid at Burwell through consultation with National Grid Electricity Transmission (NGET). This has helped to shape the content of the Scheme design as submitted.

6.2.40 The cumulative impact of other energy generating projects connecting to the grid at Burwell has been considered within Chapter 5: EIA Methodology of the ES [EN010106/APP/6.2].

6.2.41 The Applicant has had regard to all comments relating to grid connection design in **Appendix J-1** and **Appendix J-2**. With regard to the matters raised in 6.2.38 above, the Applicant has set out its approach in **Table 6-8** below.

Table 6-8 Regard had to comments received from Section 42(1)(a) and (b) consultation relating to grid connection design

Matter raised	Regard had to comment by the Applicant
The cumulative impact of various energy projects that currently, or will in the future, connect to the national electricity grid at Burwell should be considered.	Section 12.11 "Cumulative Effects" of Chapter 12 of the Environmental Statement [EN010106/APP/6.1] has assessed the potential effects of the Scheme in combination with the potential effects of other development schemes within the surrounding area for each impact in each respective phase

Matter raised	Regard had to comment by the Applicant
	<p>(construction, operation and decommissioning). This includes construction employment, operation employment, PRow's and impacts to residential properties, business premises and community facilities in the surrounding area.</p> <p>The Grid Connection Statement [EN010106/APP/7.4] discusses the connection agreement in place at Burwell National Grid Substation.</p>
<p>Further information relating to the location of the proposed substation extension and cabling to the substation should be provided.</p>	<p>The Applicant is continuing to have discussions with National Grid Energy Transmission (NGET) on a regular basis. The discussions include: the extent of the order boundary around the NGET Burwell substation; details of the Burwell National Grid substation extension proposed for the Sunnica Scheme; and the proposed siting of cables from the Sunnica into the NGET Burwell substation. Details of the Applicant's proposed cabling and extension to the substation at Burwell are provided in Chapter 3: Scheme description of the Environmental Statement [EN010106/APP/6.2].</p>

Consultation process

6.2.42 Consultees that provided substantive comments relating to the consultation process included:

- | | |
|------------------------------|------------------------------|
| a. Chippenham Parish Council | d. Kennett Parish Council |
| b. Freckenham Parish Council | e. Worlington Parish Council |
| c. Isleham Parish Council | f. Snailwell Parish Council |

6.2.43 The matters most commonly raised by the above consultees included:

- The consultation did not allow for face-to-face contact and was conducted entirely online;

- b. The consultation webinars were held at inconvenient times and the format provided only for written questions that were not always answered sufficiently;
- c. There were delays in responding to questions asked by email;
- d. The PEI Report lacked detail in certain areas such as generating capacity and contained maps that are difficult to read;
- e. Consultation materials were delivered in plain envelopes that could be mistaken for advertising material;
- f. There was no direct dialogue with Isleham residents prior to the start of the statutory consultation;
- g. The consultation booklet contained small font and omitted facts that could only be found in the PEI Report;
- h. Printed copies of the PEI Report offered to local parish councils contained only the main chapters and not the appendices; and,
- i. Provide plans at a greater scale to allow for easier review of the Scheme proposals and EIA information.

6.2.44 The Applicant has had regard to all comments relating to consultation process in **Appendix J-1** and **Appendix J-2**. With regard to the matters raised in 6.2.43 above, the Applicant has set out its approach in **Table 6-9** below.

Table 6-9 Regard had to comments received from Section 42(1)(a) and (b) consultation relating to consultation process

Matter raised	Regard had to comment by the Applicant
The consultation did not allow for face-to-face contact and was conducted entirely online.	<p>The Applicant's Statement of Community Consultation (SoCC) (Appendix D-2) included a number of measures to allow those without internet access to engage with the consultation, these included direct mailout of a consultation booklet to over 10,000 addresses in the area around the Scheme, and the opportunity to hold a booked telephone conversation with members of the project team. The Applicant consulted in line with the SoCC.</p> <p>Further details are provided within Chapter 4 of this report.</p>
The consultation webinars were held at inconvenient times and the format	During the statutory consultation, the Applicant consulted in line with the

Matter raised	Regard had to comment by the Applicant
<p>provided only for written questions that were not always answered sufficiently.</p>	<p>Statement of Community Consultation (Appendix D-2) which was developed through consultation with the host local authorities.</p> <p>The Applicant held 15 webinars in total during the consultation. These included six topic-specific webinars that were each held twice to give consultees an opportunity to attend a second event if they could not attend the first one. The topic-specific webinars were scheduled either for 2:00pm on Saturdays or 6:00pm on Thursdays. The Applicant held three additional webinars following the extension to the consultation, each of these was held on a Wednesday evening at 7:00pm. Each webinar was recorded and made available on the project website. One webinar recording broke, and the Applicant transcribed answers to each question answered and uploaded this as a pdf document with the recording to compensate for the lack of recorded content.</p> <p>During the webinars, the Applicant answered as many questions as it could. This included extending the time of webinars to take additional questions and publishing responses to any questions that could not be answered during the webinars on its website. The nature of some questions meant that it was not possible to give a full response during the statutory consultation as the proposed design was still evolving and the environmental information presented in the Preliminary Environmental Information Report (PEI Report) was preliminary in nature. This is common practice during statutory consultation and does not represent a refusal by the Applicant to answer questions.</p>

Matter raised	Regard had to comment by the Applicant
<p>There were delays in responding to questions asked by email.</p>	<p>The Applicant responded to a large number of enquiries during the statutory consultation, some of which were very technical in nature and required specialist input, this meant that some enquiries required more time to form a response than others.</p>
<p>The PEI Report lacked detail in certain areas such as generating capacity and contained maps that are difficult to read.</p>	<p>The Applicant considers that it has provided sufficient detail to enable consultees to give informed feedback to the consultation. The Preliminary Environmental Information Report (PEI Report) which included a comprehensive scheme description, was necessarily preliminary in nature, reflecting the fact that consultation was undertaken at a time to enable feedback to influence the scheme the subject of the application. As is established practice, the Applicant assessed the Scheme's impact according to Rochdale Envelope method of assessing the maximum parameters, meaning that a worst-case scenario for the impacts of the Scheme has been assessed in the PEI Report and the Environmental Statement. It is established practice that detailed design only be finalised prior to commencement of construction. Finalisation of the detailed design will be secured by a Requirement in the DCO, which will require approval by the relevant planning authority of the detailed design in accordance with documents submitted as part of the DCO Application.</p>
<p>Consultation materials were delivered in plain envelopes that could be mistaken for advertising material.</p>	<p>The Applicant advertised the consultation in accordance with the methods identified within the Statement of Community Consultation (SoCC) (Appendix D-2) which was prepared in consultation with host local authorities.</p>

Matter raised	Regard had to comment by the Applicant
	Further details of the Applicant's consultation advertisements are included within Chapter 4 of this report.
There was no direct dialogue with Isleham residents prior to the start of the statutory consultation.	<p>The Applicant revised the Scheme design following the non-statutory consultation. This was, in part, as a result of the feedback received during the non-statutory consultation. The non-statutory consultation was an informal consultation held by the Applicant to identify important issues at an early stage and to raise awareness of the Scheme locally. The Applicant's consultation activity during the non-statutory consultation included an event in Isleham, a letter publicising the consultation was posted to addresses in Isleham and Isleham Parish Council was notified of the consultation. Further information on the non-statutory can be found in Chapter 2 of the Consultation Report.</p> <p>It was not possible to share updated maps prior to the start of the statutory consultation as the Applicant's design was still evolving and it was not possible to present such interim designs with appropriate context. It is not the view of the Applicant that the early publication of such plans would have enhanced engagement.</p> <p>During the statutory consultation, the Applicant consulted in line with the Statement of Community Consultation (SoCC), available in Appendix D-2, and extended the consultation period to run between 22 September 2020 and 18 December 2020. The Applicant considers this to be an adequate time frame to make an informed response to the statutory consultation. The Applicant received a significant volume of feedback during the statutory</p>

Matter raised	Regard had to comment by the Applicant
	<p>consultation. This included 705 individual responses from the community. Of the responses that gave a postcode, 90 of these were from Isleham.</p> <p>Further details of the Applicant's consultation activity are provided within Chapter 4 of this report.</p>
<p>The consultation booklet contained small font and omitted facts that could only be found in the PEI Report.</p>	<p>The Applicant produced a number of different consultation materials and provided means for consultees to contact the project team with questions or to seek further details through a dedicated freephone telephone number advertised in a letter sent to over 10,000 addresses in Consultation Zone 1, the consultation booklet sent to the same addresses, the Applicant's website and the webinars. The Applicant provided a briefing pack to local councillors and parish councils that invited them to get in touch in the event that they were aware of anyone who was having difficulty taking part in the consultation. The booklet invited consultees to contact the project team if they wanted hard copies of an of the consultation materials. Where consultees requested maps in larger formats, the Applicant provided copies. The Applicant considers that the consultation brochure provided an appropriate, non-technical, overview of the scheme.</p> <p>The Applicant consulted in accordance with the Statement of Community Consultation (Appendix D-2), further details of the Applicant's consultation activity can be found in Chapter 4 of this report and the Applicant's consultation materials can be found in appendices G-2 to G-4.</p>
<p>Printed copies of the PEI Report offered</p>	<p>The Applicant provided hard-copies of the core chapters of the PEIR to parish councils</p>

Matter raised	Regard had to comment by the Applicant
to local parish councils contained only the main chapters and not the appendices.	<p>who requested them on a voluntary basis in addition to the consultation activity detailed within the Statement of Community Consultation (SoCC) (Appendix D-2).</p> <p>The Applicant consulted in line with the activity outlined in the SoCC (which was prepared in consultation with host local authorities) including supplementary activity during the consultation extension such as additional webinars.</p>
Provide plans at a greater scale to allow for easier review of the Scheme proposals and EIA information.	<p>The Applicant produced a number of different consultation materials and means for consultees to contact the project team with questions or to seek further details.</p> <p>The Applicant consulted in accordance with the SoCC (Appendix D-2), further details of the Applicant's consultation activity can be found in Chapter 4 of this report and the Applicant's consultation materials can be found in appendices G-2 to G-4.</p>

EIA process

6.2.45 Consultees that provided substantive comments relating to the way that the EIA has been undertaken to date included:

- | | |
|--|------------------------------------|
| a. Cambridgeshire County Council; | d. West Suffolk Council; |
| b. East Cambridgeshire District Council; | e. Chippenham Parish Council; and, |
| c. Suffolk County Council; | f. Isleham Parish Council. |

6.2.46 The matters most commonly raised by the above consultees included:

- Further information will need to be provided to assess the Scheme's impacts;
- Further weighting needs to be applied to visual impact and the impact on the landscape;
- Further information should be provided as to the Scheme's carbon emissions;

- d. There should be a wider, independent assessment of the environmental impacts;
- e. Modelling of electrical fields should be included within the EIA; and,
- f. Additional data on the agricultural land classification should be provided.

6.2.47 The Applicant has had regard to all comments relating to EIA process in **Appendix J-1** and **Appendix J-2**. With regard to the matters raised in 6.2.46 above, the Applicant has set out its approach in **Table 6-10** below.

Table 6-10 Regard had to comments received from Section 42(1)(a) and (b) consultation relating to EIA process

Matter raised	Regard had to comment by the Applicant
Further information will need to be provided to assess the Scheme's impacts.	The Applicant considers that it has provided sufficient detail to enable consultees to give informed feedback to the consultation. The Preliminary Environmental Information Report (PEI Report), which included a comprehensive scheme description, was necessarily preliminary in nature, reflecting the fact that consultation was undertaken at a time to enable feedback to influence the scheme the subject of the application. As is established practice, the Applicant assessed the Scheme's impact according to Rochdale Envelope method of assessing the maximum parameters, meaning that a worst-case scenario for the impacts of the Scheme has been assessed in the PEI Report and the Environmental Statement. It is established practice that detailed design only be finalised prior to commencement of construction. Finalisation of the detailed design will be secured by a Requirement in the DCO, which will require approval by the relevant planning authority of the detailed design in accordance with documents submitted as part of the DCO Application.
Further weighting needs to be applied to visual impact and the impact on the	The Applicant considers the Scheme to be appropriately sited, and that its

Matter raised	Regard had to comment by the Applicant
landscape.	design and development has given significant weight to environmental considerations, The Alternative Assessment considered a range of spatial constraints in determining the appropriateness of the site, including designated international and national ecological and geological sites, Agricultural Land Classification, Urban Areas, Greenbelt and nationally designated landscapes, see Chapter 4 of the Environmental Statement [EN010106/APP/6.1] for further information. The Design and Access Statement explains the iterative design process that has been undertaken in the scheme design, including consideration of visual impacts and aiding integration via the retention of existing site features and where necessary introducing landscape mitigation measures; to be managed pursuant to the Outline Landscape and Ecology Management Plan. The landscape and visual impact assessment (LVIA) also assesses the Scheme in relation to landscape character areas and people views.
Further information should be provided as to the Scheme's carbon emissions.	The lifecycle Greenhouse Gas(GHG) impact assessment undertaken by the Applicant, as presented in Chapter 6 Climate Change of the Environmental Statement [EN010106/APP/6.1], considers all GHG emissions arising over the lifecycle of the Scheme (including construction, operation and decommissioning), and has been carried out in accordance with the Institute of Environmental Management and Assessment (IEMA) guidance for assessing GHG emissions within Environmental Impact Assessment. The Applicant is of the view that the development can be described as sustainable. The Scheme is answering

Matter raised	Regard had to comment by the Applicant
	<p>an urgent national need for forms of low carbon, renewable energy generation. The GHG intensity of the Scheme compares favourably with the projected grid GHG intensity, as well as with alternative energy generation types, and it is estimated that an additional 1,118,011 tCO₂e would be emitted to generate the equivalent amount of electricity over the operational lifetime of the Scheme from the projected grid energy mix.</p>
<p>There should be a wider, independent assessment of the environmental impacts.</p>	<p>The role of the Applicant in undertaking an Environmental Impact Assessment (EIA) in consultation with the Planning Inspectorate, statutory undertakers and the host authorities, is a well-established part of the planning process for Nationally Significant Infrastructure Projects (NSIPs) such as the Scheme. The results of the Applicant's EIA activity are presented in the Environmental Statement [EN010106/APP/6.1] submitted as part of the Applicant's DCO application.</p>
<p>Modelling of electrical fields should be included within the EIA.</p>	<p>The Applicant has consulted with local Care Commissioning Groups as part of the statutory consultation.</p> <p>The Applicant has considered the impact of electromagnetic fields on human health and has consulted with Public Health England in relation to this point at the Environmental Impact Assessment (EIA) scoping stage.</p> <p>The impact of electromagnetic fields on human health was scoped out of the Environmental Impact Assessment (EIA) and this approach was agreed by the Planning Inspectorate at the scoping stage undertaken in 2019. This was because it was considered that the</p>

Matter raised	Regard had to comment by the Applicant
	proposed Sunnica Energy Farm did not present any significant risk to human health. Further information is available within the Scoping Opinion included as Appendix 1B of the ES [EN010106/APP/6.2]. Public Health England did not raise a concern with this approach when consulted on the scoping report.
Additional data on the agricultural land classification should be provided.	Assessment of the agricultural land quality and versatility follows Natural England Guidance given in TIN049. The majority of the land (96.2%) within the Order limits is classed as not being 'Best and Most Versatile' land. An assessment of the agricultural quality and versatility has been provided in Chapter 12 of the Environmental Statement [EN010106/APP/6.1] and Appendix 12B Soils and Agriculture Baseline Report in the Environmental Statement [EN010106/APP/6.2].

Construction

6.2.48 Consultees that provided substantive comments relating to construction included:

- | | |
|---------------------------------------|--|
| a. Anglian Water; | j. East Cambridgeshire District Council; |
| b. Cambridgeshire Local Access Forum; | k. Historic England; |
| c. Chippenham Parish Council; | l. Isleham Parish Council; |
| d. Environment Agency; | m. Kennett Parish Council; |
| e. Freckenham Parish Council; | n. National Grid; |
| f. Snailwell Parish Council; | o. Suffolk Local Access Forum; |
| g. Suffolk County Council; | p. Network Rail; |
| h. West Suffolk Council; | q. Natural England; and, |
| i. Cambridgeshire County Council; | r. Worlington Parish Council. |

6.2.49 The matters most commonly raised by the above consultees included:

- a. The construction of the cable route will need to take account of existing infrastructure;
- b. Care will need to be taken for the crossing of pipelines during construction;
- c. Diversions will need to be applied to PRoW;
- d. Concern at the impact of construction on local wildlife;
- e. Concern at the impact of dust during construction and wider effects on air quality;
- f. Concern at the stress caused to local residents during the construction phase;
- g. Construction activities will need to guard against pollution;
- h. Consideration needs to be given to waste management during construction;
- i. Construction activity within flood zone 3 will need to be managed to avoid adverse impacts;
- j. The modelling used for traffic movements in the CEMP is flawed and further detail is needed, and;
- k. Consider the impact of construction lighting on bats.

6.2.50 The Applicant has had regard to all comments relating to construction in **Appendix J-1** and **Appendix J-2**. With regard to the matters raised in 6.2.49 above, the Applicant has set out its approach in **Table 6-11** below.

Table 6-11 Regard had to comments received from Section 42(1)(a) and (b) consultation relating to construction

Matter raised	Regard had to comment by the Applicant
The construction of the cable route will need to take account of existing infrastructure.	The Applicant has continued to engage with a number of consultees following the statutory consultation, including National Grid Gas and Cadent Gas. This engagement has assisted with the development of the Scheme design to ensure appropriate setbacks from the infrastructure are provided alongside suitable access. The Applicant has been in detailed discussions with National Grid and Cadent and is negotiating protective provisions with those parties (included in the draft

Matter raised	Regard had to comment by the Applicant
	<p>DCO) for the protection of their pipelines. Further details of this are provided in Chapter 3 of the Environmental Statement [EN010106/APP/6.1], and construction mitigation is provided in the Framework Construction Environmental Management Plan (CEMP) within Appendix 16C of the Environmental Statement [EN010106/APP/6.2].</p>
<p>Care will need to be taken for the crossing of pipelines during construction.</p>	<p>The Applicant has continued to engage with a number of consultees following the statutory consultation, including National Grid Gas and Cadent Gas. This engagement has assisted with the development of the Scheme design to ensure appropriate setbacks from the infrastructure are provided alongside suitable access. The Applicant has been in detailed discussions with National Grid and Cadent and is negotiating protective provisions with those parties (included in the draft DCO) for the protection of their pipelines. Further details of this are provided in Chapter 3 of the Environmental Statement [EN010106/APP/6.1], and construction mitigation is provided in the Framework CEMP within Appendix 16C of the Environmental Statement [EN010106/APP/6.2].</p>
<p>Diversions will need to be applied to PROW.</p>	<p>All existing PROW within the Scheme boundary are retained and will remain accessible during the operational phases of the Scheme.</p> <p>The Applicant is proposing to temporarily close some PROW during construction. The PROWs would be closed for the shortest timeframe necessary. The Environmental Statement [EN010106/APP/6.1] assumes as a worst case scenario that</p>

Matter raised	Regard had to comment by the Applicant
	<p>each PRoW will be closed for up to three weeks during the construction phase. When a PRoW is closed, there are alternative options available in the local area. Diversion routes will be identified and signs indicating those routes provided for all users.</p>
<p>Concern at the impact of construction on local wildlife.</p>	<p>Following the statutory consultation, the Applicant has conducted further assessment activity and further developed its Scheme proposals including further refinements to Appendix 16C Framework CEMP of the ES [EN010106/APP/6.2]. This sets out how the Applicant is proposing to mitigate the environmental impacts of its construction activity, including to ecological receptors.</p> <p>The results of the Applicants assessments on the Scheme's impact on ecological receptors is included in Chapter 8 of the Environmental Statement [EN010106/APP/6.1]. The assessment has taken the impact of nesting seasons into account, concludes that there will be no significant effects on ecology and nature conservation.</p>
<p>Concern at the impact of dust during construction and wider effects on air quality.</p>	<p>An assessment of air quality effects of the Scheme is provided in Chapter 14 of the Environmental Statement [EN010106/APP/6.1]. Mitigation measures to control air quality during construction are provided in Appendix 16C Framework Construction Environmental Management Plan of the ES [EN010106/APP/6.2].</p>
<p>Concern at the stress caused to local residents during the construction phase.</p>	<p>The Applicant recognises that construction activity can be disruptive and has the potential to impact upon local communities.</p>

Matter raised	Regard had to comment by the Applicant
	<p>The Applicant has assessed the likely impacts of construction and provided details of its proposals to avoid or mitigate adverse effects in Appendix 16C Framework CEMP of the ES [EN010106/APP/6.2] submitted as part of the Applicant's DCO application. Where significant impacts have been identified, the Applicant is proposing mitigation that is also outlined in the Framework CEMP. The impacts of construction traffic and the Applicant's proposed mitigation are outlined in the Transport Assessment (Appendix 13B) [EN010106/APP/6.2].</p>
<p>Construction activities will need to guard against pollution.</p>	<p>A CEMP; OEMP and DEMP are proposed to manage emissions and pollution from construction, operation and decommissioning activities and are required to be implemented by the Draft DCO [EN010106/APP/3.1]. The Framework CEMP, DEMP and OEMP can be found in Appendices 16C, 16E and 16F of the Environmental Statement respectively [EN010106/APP/6.2].</p>
<p>Consideration needs to be given to waste management during construction.</p>	<p>The Applicant has considered waste management within Chapter 16 of the Environmental Statement [EN010106/APP/6.1] and measures to mitigate environmental effects are outlined in the Framework CEMP and Framework DEMP in Appendices 16C and 16E respectively of the Environmental Statement [EN010106/APP/6.2].</p>
<p>Construction activity within flood zone 3 will need to be managed to avoid adverse impacts.</p>	<p>The Applicant has provided details as to how it proposes to manage construction at the parts of the Scheme within flood zone 3. This can be found in the Appendix 9C Flood Risk Assessment</p>

Matter raised	Regard had to comment by the Applicant
	including Drainage Technical Note of the ES [EN010106/APP/6.2] and Appendix 16C Framework CEMP of the ES [EN010106/APP/6.2].
The modelling used for traffic movements in the CEMP is flawed and further detail is needed.	<p>The Applicant has engaged with the highways authorities for Suffolk and Cambridgeshire alongside Highways England in preparing its Scheme proposals.</p> <p>The car share ratio is based on previous experience in Suffolk on a DCO application with further information provided within Appendix 13B Transport Assessment and Appendix 13C Framework Construction Traffic Management Plan and Travel Plan of the Environmental Statement [EN010106/APP/6.2].</p>
Consider the impact of construction lighting on bats.	A Framework CEMP and a Framework OEMP have been submitted as part of the DCO Application in Appendix 16C and 16F respectively of the Environmental Statement [EN010106/APP/6.2]. These plans include commitments on lighting. During construction, the use of lighting will be minimised to that required for safe site operations, lighting will utilise directional fittings to minimise outward light spill and glare (e.g., via the use of light hoods/cowls which direct light below the horizontal plane, preferably at an angle greater than 20° from horizontal) and lighting will be directed towards the middle of the construction site rather than towards the boundaries. During operation, the use of motion detection security lighting to avoid permanent lighting will be utilised and a sensitive lighting scheme will be developed ensuring inward distribution of light and avoiding light spill on to existing

Matter raised	Regard had to comment by the Applicant
	<p>boundary features.</p> <p>Specific areas to be kept dark during construction and operation are not provided within these documents at this stage, and these details would be highlighted within the full CEMP and OEMP following detailed design and prior to the construction and operation phases respectively. Details regarding the location of important bat flight lines, foraging habitat or potential roosts is provided in Appendix 8H Wintering Bird Survey Report of the Environmental Statement [EN010106/APP/6.2].</p>

Operations

6.2.51 Consultees that provided substantive comments relating to operations included:

- | | |
|--|-------------------------------|
| a. Cambridgeshire County Council; | h. Environment Agency; |
| b. East Cambridgeshire District Council; | i. Freckenham Parish Council; |
| c. Suffolk County Council; | j. Isleham Parish Council; |
| d. Snailwell Parish Council; | k. Kennett Parish Council; |
| e. West Suffolk Council; | l. National Grid; |
| f. Anglian Water; | m. Natural England; and, |
| g. Chippenham Parish Council; | n. Worlington Parish Council. |

6.2.52 The matters most commonly raised by the above consultees included:

- There is an opportunity to lead on UK research into the operational impacts of developments of this size;
- Potential operating impacts on wildlife;
- An emergency plan needs to be put in place for the BESS' operations;
- There is the potential for light pollution during operations;
- Care will need to be taken to avoid groundwater contamination during operations, and,

- f. Not enough staff are being proposed to monitor and maintain the sites during their operational life.

6.2.53 The Applicant has had regard to all comments relating to operations in **Appendix J-1** and **Appendix J-2**. With regard to the matters raised in 6.2.52 above, the Applicant has set out its approach in **Table 6-12** below.

Table 6-12 Regard had to comments received from Section 42(1)(a) and (b) consultation relating to operations

Matter raised	Regard had to comment by the Applicant
There is an opportunity to lead on UK research into the operational impacts of developments of this size.	The Applicant has continued to engage with Natural England following the statutory consultation and welcomes the opportunity to work with Natural England in providing research opportunities during the operating life of the project. Details of the Applicant's current proposals for the management of the proposed Sunnica Energy Farm can be found in Appendix 10I Outline Landscaping and Ecological Management Plan of the Environmental Statement [EN010106/APP/6.2]. This will be updated subject to the Applicant receiving planning consent and the final design of the project.
Potential operating impacts on wildlife.	<p>The Applicant acknowledges the Scheme has the potential to impact ecological receptors. The Applicant has undertaken a full EIA to assess the likely impacts and where appropriate, suitable mitigation is proposed. The Ecology and Nature Conservation chapter is included within Chapter 8 of the Environmental Statement [EN010106/APP/6.1].</p> <p>The Applicant has further developed its proposals for ecological mitigation areas in consultation with stakeholders including Natural England and the Environment Agency.</p> <p>Details of the Applicant's proposed ecological mitigation can be found in</p>

Matter raised	Regard had to comment by the Applicant
	Appendix 10I Outline LEMP [EN010106/APP/6.2].
An emergency plan needs to be put in place for the BESS' operations	<p>The Applicant has submitted an Outline Fire Safety Management Plan [EN010106/APP/7.6] as part of its DCO application. This strategy has been developed through consultation with the Suffolk and Rescue Department and has incorporated their requirements. A requirement to Schedule 2 of the DCO will require the approval and implementation of the final Fire Safety Management Plan, prior to commencement of the Scheme, at which time the plan will have been further developed so that it reflects the final Scheme design. The approval of the final plan is proposed to be by the relevant planning authorities in consultation with the Health and Safety Executive, the Cambridgeshire Fire and Rescue Service and the Suffolk Fire and Rescue Service.</p> <p>A requirement of the Outline Fire Safety Management Plan is the production of an emergency response plan.</p>
There is the potential for light pollution during operations.	<p>The amount of lighting during operation is minimal and best practice lighting design can mitigate light pollution. The impact of operational lighting has been assessed within Chapter 10 of the Environmental Statement [EN010106/APP/6.1] with no significant effects identified.</p> <p>The Framework Operations Environmental Management Plan (OEMP) presents mitigation measures during the operational phase and is available in Appendix 16F of the Environmental Statement [EN010106/APP/6.2].</p>

Matter raised	Regard had to comment by the Applicant
<p>Care will need to be taken to avoid groundwater contamination during operations.</p>	<p>The Scheme will have an Environmental Management Plan in place for the operation and maintenance of the Scheme. This will include measures to regulate the environmental effects of the operational phase of the Scheme including measures to manage the risk from pollution from small leaks and spillages from maintenance activities.</p> <p>The Environmental Management Plan will include a schedule for regular visual inspection of the solar PV panels. Through observation of any structural defects in the solar PV the Applicant will be removed before there is any leakage of chemicals from the sealed units. The panels are constructed in a robust manner and their components cannot be separated except with a considerable mechanical load. Therefore, the risk of any liquid leakage from the panels is very low.</p> <p>Details of the embedded mitigation measures can be found in Chapter 9 of the Environmental Statement [EN010106/APP/6.1].</p>
<p>Not enough staff are being proposed to monitor and maintain the sites during their operational life.</p>	<p>The Scheme will have an OEMP in place for the operation and maintenance of the Scheme. This will include measures to regulate the environmental effects of the operational phase of the Scheme including measures to manage the risk from pollution from small leaks and spillages from maintenance activities.</p> <p>The OEMP will include a schedule for regular visual inspection of the solar PV modules. Through observation of any structural defects in the solar PV the Applicant will be removed before there is any leakage of chemicals from the sealed units.</p>

Matter raised	Regard had to comment by the Applicant
	The OEMP will be based on the Framework OEMP provided in Appendix 16F of the Environmental Statement [EN010106/APP/6.2].

Decommissioning

6.2.54 Consultees that provided substantive comments relating to the decommissioning of the Scheme included:

- | | |
|--|------------------------------------|
| a. Cambridgeshire County Council; | h. Freckenham Parish Council; |
| b. East Cambridgeshire District Council; | i. Snailwell Parish Council; |
| c. Suffolk County Council; | j. Highways England; |
| d. West Suffolk Council; | k. Isleham Parish Council; |
| e. Chippenham Parish Council; | l. Kennett Parish Council; |
| f. Environment Agency; | m. Worlington Parish Council; and, |
| g. Fordham Parish Council; | n. Natural England. |

6.2.55 The matters most commonly raised by the above consultees included:

- The level of carbon emissions during decommissioning needs to be considered;
- Further consideration needs to be given as to how decommissioning will impact upon wildlife and habitats;
- Further information needs to be provided on the Applicant's proposals for decommissioning including a vision for the sites, post-decommissioning;
- Steps need to be taken to consider the well-being of local residents during decommissioning;
- Further information is needed on how the decommissioning will be funded, particularly if operations cease earlier than the proposed 40-year operating window;
- How will Scheme materials be disposed of?
- The assumptions in place for decommissioning traffic movements are reasonable, and,
- The sites must be returned to their present state post-decommissioning.

6.2.56 The Applicant has had regard to all comments relating to decommissioning in **Appendix J-1** and **Appendix J-2**. With regard to the matters raised in 6.2.55 above, the Applicant has set out its approach in **Table 6-13** below.

Table 6-13 Regard had to comments received from Section 42(1)(a) and (b) consultation relating to decommissioning

Matter raised	Regard had to comment by the Applicant
<p>The level of carbon emissions during decommissioning needs to be considered.</p>	<p>The Applicant agrees it is important to minimise carbon emissions from the Scheme during construction, operation and decommissioning. The Applicant has provided details of the measures it proposes to take to minimise impacts during construction in the Framework CEMP at Appendix 16C of the ES [EN010106/APP/6.2]. Measures to manage carbon emissions during operation and decommissioning are outlined in the Framework OEMP provided in Appendix 16F of the ES [EN010106/APP/6.2] and the Framework Decommissioning Environmental Management Plan (DEMP) at Appendix 16E of the ES [EN010106/APP/6.2]. The Applicant has considered the Scheme's greenhouse gas emissions during construction, operations and decommissioning in Chapter 6 Climate Change of the Environmental Statement [EN010106/APP/6.1].</p>
<p>Further consideration needs to be given as to how decommissioning will impact upon wildlife and habitats.</p>	<p>The Applicant will be required to decommission the Scheme at the end of its 40 year operating life in accordance with the conditions of any DCO. The Applicant has provided a Draft DCO [EN010106/APP/3.1] as part of its DCO application which secures this.</p> <p>The Applicant has submitted a Framework DEMP in Appendix 16E of the Environmental Statement [EN010106/APP/6.2] with the DCO Application. Given that the Scheme is expected to operate for 40 years, the</p>

Matter raised	Regard had to comment by the Applicant
	<p>DEMP will be updated prior to decommissioning to account for the latest technology including the recycling of solar PV panels.</p> <p>The habitat created in the Scheme will be left in place during and following decommissioning. Following decommissioning, the land will be returned to the landowners. At this point, the Applicant will no longer have a say in what the land is used for.</p> <p>The DCO consent will require the return of the land to its existing use, anything other than returning the land to its current use would require a separate planning application or DCO application, in the same way as housing or industrial uses require this consent now.</p>
<p>Further information needs to be provided on the Applicant's proposals for decommissioning including a vision for the sites, post-decommissioning.</p>	<p>The Applicant has provided the Appendix 16E Framework DEMP of the Environmental Statement [EN010106/APP/6.1] which sets out how the decommissioning process will take place. The Applicant is committed to returning the land use to its existing use post decommissioning stage.</p>
<p>Steps need to be taken to consider the well-being of local residents during decommissioning.</p>	<p>The ES gives consideration to the well-being of residents in the coverage of the Human Health assessment in Chapter 12 of the Environmental Statement [EN010106/APP/6.1]. Access to Healthcare Services and other Social Infrastructure is included, as is Social Cohesion and Lifetime Neighbourhoods, both key areas to well-being. Consideration is given to the potential for impacts on mental health albeit indirectly through assessing an outcome in respect of each of these determinants. The assessment has shown that there is a potential for</p>

Matter raised	Regard had to comment by the Applicant
	negative impacts as a result of the Scheme; however, these are temporary.
Further information is needed on how the decommissioning will be funded, particularly if operations cease earlier than the proposed 40-year operating window.	<p>The DCO will require that the Scheme is decommissioned after 40 years of operation, and that requirement will be enforceable through the Planning Act 2008 against the person with the benefit of the Order at that time. A Framework Decommissioning Environmental Management Plan (DEMP) has been prepared and is presented in Appendix 16E of the Environmental Statement [EN010106/APP/6.2] which provides the outline mitigation measures to be adhered to during decommissioning. The DCO includes a requirement in Schedule 2 requiring the preparation and approval of the DEMP substantially in accordance with the Framework DEMP, and for the approved DEMP to be implemented. That requirement is also enforceable through the Planning Act 2008. With these measures in place, we do not consider a bond to be appropriate or necessary.</p>
How will Scheme materials be disposed of?	<p>The creation of waste during decommissioning is considered in Chapter 16 of the Environmental [EN010106/APP/6.1]] and so the effects of this has been considered in the Environmental Statement. Sunnica is committed to compliance with the waste hierarchy when decommissioning plant used in the Scheme, and this includes both solar panels and batteries.</p> <p>Given that the Scheme is expected to operate for 40 years, it is not possible to say now exactly how decommissioning will take place and therefore Sunnica proposes to secure the provision of a DEMP, which will include a Decommissioning Resource Management Plan setting out how waste will be dealt with prior to the</p>

Matter raised	Regard had to comment by the Applicant
	<p>commencement of decommissioning.</p> <p>The framework DEMP includes proposals to ensure that waste disposal is carried out in accordance with the waste hierarchy and where waste disposal is unavoidable that it is responsibly disposed of.</p>
<p>The assumptions in place for decommissioning traffic movements are reasonable.</p>	<p>Details of the decommissioning process can be found within Appendix 16E Framework DEMP of the Environmental Statement [EN010106/APP/6.2]. As part of the DEMP a commitment is made to produce a decommissioning CTMP and TP document.</p>
<p>The sites must be returned to their present state post-decommissioning.</p>	<p>The Applicant will be required to decommission the Scheme at the end of its 40-year operating life in accordance with the conditions of any DCO. The Applicant has provided a Draft DCO [EN010106/APP/3.1] as part of its DCO application which secures this.</p> <p>The DCO consent will require the return of the land to its existing use, anything other than returning the land to its current use would require a separate planning application or DCO application, in the same way as housing or industrial uses require this consent now.</p>

Ecology

6.2.57 Consultees that provided substantive comments relating to ecology included:

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|-----------------------------------|--|
| a. Suffolk County Council; | d. East Cambridgeshire District Council; |
| b. West Suffolk Council; | e. Chippenham Parish Council; |
| c. Cambridgeshire County Council; | f. Environment Agency; |

- | | |
|-------------------------------|-------------------------------------|
| g. Snailwell Parish Council; | l. Kennett Parish Council; |
| h. Fordham Parish Council; | m. Worlington Parish Council; |
| i. Freckenham Parish Council; | n. Suffolk Local Access Forum; and, |
| j. Forestry Commission; | o. Natural England. |
| k. Isleham Parish Council; | |

6.2.58 The matters most commonly raised by the above consultees included:

- a. The PEI Report lacks details on the characterisation of impacts and excludes some ecological features;
- b. The Applicant should provide details of its proposals to achieve a biodiversity net gain;
- c. Air quality impacts on wildlife need to be considered;
- d. The Applicant should provide appropriate lighting conditions for bats;
- e. Further adherence to the mitigation hierarchy is required with greater avoidance of habitats and species;
- f. Design changes are required to avoid key habitats;
- g. Further information is required on the proposed undeveloped mitigation areas and the species that they are expected to support;
- h. The mitigation proposed for stone curlews needs to form a connected habitat;
- i. Further information needs to be provided as to when and where replacement habitats will support species;
- j. Care needs to be taken over what happens to the replacement habitats at the end of the Scheme's operating life;
- k. The needs of species such as bats and birds should be considered during the operating phase;
- l. Additional land is required for stone curlew habitat mitigation;
- m. The stone curlews foraging in the area are likely to be linked to the Breckland Special Area of Conservation (SPA) population; and,
- n. Efforts should be made to retain existing woodland.

6.2.59 The Applicant has had regard to all comments relating to ecology in **Appendix J-1** and **Appendix J-2**. With regard to the matters raised in 6.2.58 above, the Applicant has set out its approach in **Table 6-14** below.

Table 6-14 Regard had to comments received from Section 42(1)(a) and (b) consultation relating to ecology

Matter raised	Regard had to comment by the Applicant
The PEI Report lacks details on the characterisation of impacts and excludes some ecological features.	The Applicant considers that Chapter 8 of the Environmental Statement provides a full and robust assessment, following CIEEM (2018) guidelines, of the potential impacts of the Scheme on important ecological features and that this is supported by a comprehensive Framework CEMP (Appendix 16C of the Environmental Statement) and OLEMP (Appendix 10I of the Environmental Statement [EN010106/APP/6.2]).
The Applicant should provide details of its proposals to achieve a biodiversity net gain	The Applicant is aiming to achieve a biodiversity net gain through the delivery of the Scheme and has set out proposals on how it proposes to achieve this in the Biodiversity Net Gain Assessment [EN010106/APP/6.7] submitted as part of the Applicant's DCO application. The Scheme will provide an approximate net gain in biodiversity of 83% for habitat units, 16% for hedgerow units and 1% for river units. Details of the biodiversity net gain calculations are provided in the Biodiversity Net Gain Assessment.
Air quality impacts on wildlife need to be considered	The Applicant has provided further details about the potential impact of the Scheme on air quality during construction. This includes an assessment on the potential risks to air quality in designated ecology sites. This is outlined in Chapter 14 Air Quality of the Environmental Statement [EN010106/APP/6.1]. The air quality assessment concludes that, with mitigation, the effect on air quality in the vicinity of designated ecology sites would be low risk. Mitigation measures to minimise emissions and dust during construction are provided in Appendix

Matter raised	Regard had to comment by the Applicant
	<p>16C Framework Construction Environmental Management Plan of the ES [EN010106/APP/6.2].</p> <p>The Applicant has considered the impact of construction traffic on air quality, the number of anticipated vehicle movements per day is approximately 700 (AADT - the majority of which is staff cars). Further information is provided in Appendix 13C Framework Construction Traffic Management Plan and Travel Plan of the ES [EN010106/APP/6.2].</p>
<p>The Applicant should provide appropriate lighting conditions for bats</p>	<p>A Framework CEMP and a Framework OEMP have been submitted as part of the DCO Application in Appendix 16C and 16F respectively of the Environmental Statement [EN010106/APP/6.2]. These plans include commitments on lighting. During construction, the use of lighting will be minimised to that required for safe site operations, lighting will utilise directional fittings to minimise outward light spill and glare (e.g. via the use of light hoods/cowls which direct light below the horizontal plane, preferably at an angle greater than 20° from horizontal) and lighting will be directed towards the middle of the construction site rather than towards the boundaries. During operation, the use of motion detection security lighting to avoid permanent lighting will be utilised and a sensitive lighting scheme will be developed ensuring inward distribution of light and avoiding light spill on to existing boundary features.</p> <p>Specific areas to be kept dark during construction and operation are not provided within these documents at this stage, and these details would be highlighted within the full CEMP and</p>

Matter raised	Regard had to comment by the Applicant
	OEMP following detailed design and prior to the construction and operation phases respectively. Details regarding the location of important bat flight lines, foraging habitat or potential roosts is provided in Appendix 8H Wintering Bird Survey Report of the Environmental Statement [EN010106/APP/6.2].
Further adherence to the mitigation hierarchy is required with greater avoidance of habitats and species.	Since PEIR the Scheme design has evolved in response to consultation comments, with further areas supporting notable habitats, e.g. existing grassland areas in Sunnica East Site B being removed from developable areas. The Scheme has been designed in accordance with the Mitigation Hierarchy, avoiding important habitats and species, where practicable. This is reflected in the assessment presented in Chapter 8 of the Environmental Statement [EN010106/APP/6.1], which concludes no significant effects on ecology and nature conservation. This is also demonstrated in the avoidance of designated ecological sites within Chapter 4 of the Environmental Statement [EN010106/APP/6.1].
Design changes are required to avoid key habitats.	The Applicant has reviewed its proposals having had regard to the feedback received through the statutory consultation and has made a number of changes to the Scheme design to ensure that there is appropriate habitat in place for bird species, including stone curlew. Parcels E11 and E23 (as shown in figure 4-4 of the ES [EN010106/APP/6.3]) are no longer proposed for solar and will now form ecological mitigation area ECO3 (shown in Figure 3-1 of the ES [EN010106/APP/6.3]). In addition to this, additional ecological mitigation is

Matter raised	Regard had to comment by the Applicant
	also proposed at ECO2, also shown in Figure 3-1 of the ES [EN010106/APP/6.3]. These parcels will now form part of a wider network of ecological mitigation areas.
Further information is required on the proposed undeveloped mitigation areas and the species that they are expected to support.	The undeveloped areas where habitat creation will be undertaken form a coherent and connected network of habitats, which deliver for biodiversity. These areas are shown on the parameter plans, figures 3-1 and 3-2, of the Environmental Statement [EN010106/APP/6.3] and will be secured through the Landscape and Ecology Management Plan. An Outline Landscape and Ecology Management Plan has been provided in Appendix 10I of the Environmental Statement [EN010106/APP/6.2].
The mitigation proposed for stone curlews needs to form a connected habitat.	The provision of offsetting habitat for Stone Curlew has been informed by the species distribution across the Scheme. Surveys undertaken by AECOM have shown that the nesting distribution of Stone Curlew is determined by the crop types present in any given year. The Scheme has embedded approximately 108ha of land for creation of Stone Curlew nesting and foraging habitat, in areas currently in arable farming. These areas (ECO1, ECO2 and ECO3) are shown on the parameter plans Figure 3-1 of the Environmental Statement [EN010106/APP/6.3].
Further information needs to be provided as to when and where replacement habitats will support species.	Since the PEI Report the Scheme design has evolved to avoid the majority of notable habitats. Where notable habitats are present within the Scheme measures have been embedded in the Scheme design, e.g. setbacks from existing features, such as woodland and hedgerows to protect and retain them

Matter raised	Regard had to comment by the Applicant
	<p>throughout the duration of the Scheme life. The creation of new habitats is based on the habitat communities currently present across the Scheme and recorded during the Applicant's extensive surveys. These surveys have been used to inform the creation of appropriate habitats. Details are presented in Chapter 8: Ecology and Nature Conservation of the Environmental Statement and the OLEMP sets out how they will be managed (Appendix 10I of the Environmental Statement [EN010106/APP/6.2]).</p>
<p>The assessment of ecological impacts needs to follow the standards set out by the Chartered Institute of Environment and Ecology Management.</p>	<p>Chapter 8 of the Environmental Statement [EN010106/APP/6.1] has followed the CIEEM (2018) standards, characterising the ecological impacts and providing quantified information where possible and available. Chapter 8 of the Environmental Statement and the OLEMP (Appendix 10I of the Environmental Statement [EN010106/APP/6. 2]) provide information on mitigation measures and enhancements.</p>
<p>Care needs to be taken over what happens to the replacement habitats at the end of the Scheme's operating life.</p>	<p>The DCO will require that the Scheme is decommissioned after 40 years of operation, and that requirement will be enforceable through the Planning Act 2008 against the person with the benefit of the Order at that time.</p> <p>A Framework Decommissioning Environmental Management Plan (DEMP) has been prepared and is presented in Appendix 16E of the Environmental Statement [EN010106/APP/6.2] which provides the outline mitigation measures to be adhered to during decommissioning. The DCO includes a requirement in Schedule 2 requiring the preparation</p>

Matter raised	Regard had to comment by the Applicant
	<p>and approval of the DEMP substantially in accordance with the Framework DEMP, and for the approved DEMP to be implemented. That requirement is also enforceable through the Planning Act 2008. The Applicant has submitted a Framework DEMP in Appendix 16E of the Environmental Statement [EN010106/APP/6.2] with the DCO Application. Given that the Scheme is expected to operate for 40 years, the DEMP will be updated prior to decommissioning to account for the latest technology including the recycling of solar PV panels.</p> <p>The habitat created in the Scheme will be left in place during and following decommissioning. Following decommissioning, the land will be returned to the landowners. At this point, the Applicant will no longer have a say in what the land is used for.</p> <p>The DCO consent will require the return of the land to its existing use, anything other than returning the land to its current use would require a separate planning application or DCO application, in the same way as housing or industrial uses require this consent now.</p>
<p>The needs of species such as bats and birds should be considered during the operating phase.</p>	<p>The Applicant has updated its assessment presented within the PEI Report following the statutory consultation following further engagement with a number of stakeholders, including Natural England. The Applicant has provided a full summary of mitigation for ecology in Chapter 8 of the Environmental Statement [EN010106/APP/6.1].</p>
<p>Additional land is required for stone curlew habitat mitigation.</p>	<p>In response to feedback received through the statutory consultation, the</p>

Matter raised	Regard had to comment by the Applicant
	<p>Applicant is proposing additional supporting habitat for stone curlew, the details of which have been developed in consultation with Natural England and the RSPB. The total area proposed now totals 108 ha. Further details can be found in Chapter 8 of the Environmental Statement [EN010106/APP/6.1] and in in Appendix 10I Outline LEMP [EN010106/APP/6.2].</p>
<p>The stone curlews foraging in the area are likely to be linked to the Breckland Special Area of Conservation (SPA) population.</p>	<p>The Applicant acknowledges the updated advice from Natural England and has continued to engage with Natural England following the conclusion of the statutory consultation to develop appropriate mitigation. A Habitat's Regulations Assessment Report to Inform Appropriate Assessment (Appendix 8M of the Environmental Statement) [EN010106/APP/6.2] has been submitted with the DCO.</p> <p>Parcels E11 and E23 (as shown in figure 4-4 of the ES [EN010106/APP/6.3]) are no longer proposed for solar and will now form ecological mitigation area ECO3 (shown in Figure 3-1 of the ES [EN010106/APP/6.3]).</p> <p>In addition to this, additional ecological mitigation is also proposed at ECO2, also shown in Figure 3-1 of the ES [EN010106/APP/6.3]. These parcels will now form part of a wider network of ecological mitigation areas. This increases the area set aside for stone curlews to 108ha. Stone curlew plots have been further developed in consultation with Natural England to provide sufficient nesting and foraging habitat that meet the criteria set out by Natural England. Details of these are included in the Offsetting Habitat Provision for Stone Curlews</p>

Matter raised	Regard had to comment by the Applicant
	Specification Plans [EN010106/APP/6.6] and Appendix 10M of the Environmental Statement [EN010106/APP/6.2].
Efforts should be made to retain existing woodland	No woodland will be lost as part of the Scheme. The Applicant is aiming to provide a net gain through its additional planting. Further details are provided in Appendix 10I Outline Landscape and Ecology Management Plan [EN010106/APP/6.2].

Landscape and visual amenity

6.2.60 Consultees that provided substantive comments relating to landscape and visual amenity included:

- | | |
|--|---------------------------------|
| a. Cambridgeshire County Council; | i. Fordham Parish Council; |
| b. East Cambridgeshire District Council; | j. Suffolk Local Access Forum; |
| c. Suffolk County Council; | k. Freckenham Parish Council; |
| d. West Suffolk Council; | l. Historic England; |
| e. Cambridgeshire Local Access Forum; | m. Worlington Parish Council; |
| f. Suffolk Local Access Forum; | n. Isleham Parish Council; |
| g. Chippenham Parish Council; | o. Kennett Parish Council; and, |
| h. Snailwell Parish Council; | p. Natural England. |

6.2.61 The matters most commonly raised by the above consultees included:

- Insufficient attention has been given to the landscape;
- The cumulative landscape effect needs to be considered;
- There needs to be an exemplary approach to design and mitigation;
- Further work is needed to establish local landscape characters;
- Concern at the impact of lighting on the landscape;
- Additional viewpoints and assessments are required including from the perspective of equestrian users;

- g. Planting proposals should be suitable for the different landscape characters;
- h. Sequential visual effects for users moving through the landscape should be considered;
- i. The OLEMP requires additional detail;
- j. The proposals would have an industrialising effect on the landscape;
- k. The PEI Report underestimates the negative visual impact of the proposals;
- l. Trees do not provide mitigation all year round;
- m. The view from the Limekilns cannot be mitigated;
- n. The landscape around Freckenham is not flat;
- o. A buffer area is required around the avenue at Chippenham Hall; and,
- p. Views from Dalham Hall will be harmed.

6.2.62 The Applicant has had regard to all comments relating to landscape and visual impact in **Appendix J-1** and **Appendix J-2**. With regard to the matters raised in 6.2.61 above, the Applicant has set out its approach in **Table 6-15** below.

Table 6-15 Regard had to comments received from Section 42(1)(a) and (b) consultation relating to landscape and visual amenity

Matter raised	Regard had to comment by the Applicant
Insufficient attention has been given to the landscape.	<p>A detailed Landscape and Visual Impact Assessment is included in Chapter 10 of the Environmental Statement [EN010106/APP/6.1].</p> <p>In addition to this, the Applicant has considered the local and national planning policy context within the Planning Statement [EN010106/APP/7.2] submitted as part of the Applicant's DCO application and concludes that there the Scheme is not in breach of these policies.</p> <p>The Applicant recognises that is the role of the planning system to assess the balance of the Scheme's landscape and visual impact against the benefits of renewable energy generation.</p>
The cumulative landscape effect needs	The Applicant has considered the policies of the NPPF in the preparation

Matter raised	Regard had to comment by the Applicant
to be considered.	<p>of its DCO application. The weight given to the NPPF policies in the context of the Scheme being a Nationally Significant Infrastructure Project is discussed in the Planning Statement [EN010106/APP/7.2] accompanying the DCO application.</p> <p>An assessment of cumulative impact has been undertaken by the Applicant. These are included in each of the technical chapters (Chapters 6 to 16) and summarised in Chapter 17 of the ES [EN010106/APP/6.1]. This includes details of all the planning applications that have been submitted or accepted within the proximity of the Scheme.</p> <p>Chapter 17 includes consideration of intra-project cumulative effects (or effect interactions), where the assessment from multiple topics have been found to affect a single receptor. This assessment concluded that the effect interactions for all receptors would not increase the significance of the effects anticipated as a result of the single topics assessed for the single receptor.</p>
There needs to be an exemplary approach to design and mitigation.	<p>The Applicant has considered the landscape and visual impacts of the Scheme extensively, as set out in Chapter 10 of the Environmental Statement, via a Landscape and Visual Impact Assessment [EN010106/APP/6.1]. The Applicant has further amended the Scheme design following the statutory consultation having regard to the feedback received and with reference to the Parameter plans in the Environmental Statement [EN010106/APP/6.2] these changes are:</p> <p>Sunnica East Site A - the extent of proposed solar panels remains to the east of Beck Road, with panels</p>

Matter raised	Regard had to comment by the Applicant
	<p>removed from E07 (now shown as EC02 in Figure 3-1 of the ES [EN010106/APP/6.3], so that the land to the west of Beck Road (ECO1 and ECO2) can be used for ecological mitigation. This will retain the open character of the landscape between Freckenham and Isleham to the west of Beck Road. ECO1 is also shown in Figure 3-1 of the ES [EN010106/APP/6.3].</p> <p>Sunnica East Site B - Parcels E11 and E23 are no longer proposed for solar development and will be for ecological mitigation and additional offsets from Worlington. These areas form part of ECO3 (shown in Figure 3-1 of the ES [EN010106/APP/6.3] which will also reduce the extent of panels in relation to U6006. A new permissive path has been included across Sunnica East Site B, to provide access from Red Lodge to Worlington and Golf Links Road, via U6006. The Scheme also incorporates additional landscape buffers in relation to the BESS at E18 and E33. These are also shown in Figure 3-1 of the ES [EN010106/APP/6.3].</p> <p>Sunnica West Site A - the extent of proposed solar development has been reduced, with the removal of parcels W13, W14 and W16 (shown in the parameter plan in figure 4-5 of the ES [EN010106/APP/6.3]) from the Order limits. The extent of proposed development has also been reduced in W15 (shown in Figure 3-2 of the ES [EN010106/APP/6.3]), with increased set backs from the local road networks.</p>
Further work is needed to establish local landscape characters.	Chapter 10 of the Environmental Statement [EN010106/APP/6.1] and the supporting appendices set out the

Matter raised	Regard had to comment by the Applicant
	<p>relevant published landscape character assessments at national, county, borough and neighbourhood level. Chapter 10 is also supported by an assessment of local landscape character areas within Appendix 10, which have been defined by the Applicant. Appendix 10E Local Landscape Character Assessment [EN010106/APP/6.2] also takes into account the published landscape character areas at all scales. The combination of the published character assessments and local landscape character areas is considered comprehensive and proportionate to the proposed Scheme.</p>
<p>Concern at the impact of lighting on the landscape.</p>	<p>Lighting has been considered within the construction and decommissioning assessments. During operation, permanent lighting with motion sensors will be installed within the substations and BESS compounds, providing a maximum of 50 lux. Any night works required on the solar panels during operation will use mobile lighting towers. In standard operating conditions there will be no lighting as a result of the Scheme and it is therefore considered not to result in significant effects and is therefore scoped out of the assessment.</p> <p>During operations, the Scheme will not be lit, with the exception of security lighting at the Battery Energy Storage System and compound locations. However, during operation of the Scheme this will be motion detected and only required when undertaking maintenance. Dark corridors for crepuscular and nocturnal species will be maintained.</p>

Matter raised	Regard had to comment by the Applicant
<p>Additional viewpoints and assessments are required including from the perspective of equestrian users.</p>	<p>The Applicant has assessed the potential visual impact of the Scheme from a variety of receptors, including from equestrian users. The assessment includes photographs from publicly accessible locations which can be accessed by horse, but the photographs are taken at eye height, not from a horse. The assessment considers both equestrian users and pedestrians for the assessment where relevant. Details of these assessments can be found in chapter of the Environmental Statement [EN010106/APP/6.1] and in the photomontages provided within the Environmental Statement Figures [EN010106/APP/6.3]. The Applicant has agreed the locations of the viewpoints with the host authorities.</p>
<p>Planting proposals should be suitable for the different landscape characters.</p>	<p>The mitigation proposals are based on hedgerows and woodlands, as found in the landscape, to reflect the existing landscape character. This has been based on the landscape character areas and observed existing vegetation. The Applicant's proposed mitigation as submitted can be found in Chapter 10 and the OLEMP of the Environmental Statement [EN010106/APP/6.2].</p>
<p>Sequential visual effects for users moving through the landscape should be considered.</p>	<p>Chapter 10 of the Environmental Statement [EN010106/APP/6.1] provides a summary of the likely significant effects. Sequential aspects of moving through the landscape are covered by several locations along PRow and roads being included within the visual assessment. The statement that no receptor can see all of the Scheme is valid as part of identifying the likely cumulative effects to a change in the view.</p>

Matter raised	Regard had to comment by the Applicant
The OLEMP requires additional detail.	The Applicant has updated its OLEMP in light of the feedback received and the results of its ongoing surveys. The OLEMP [EN010106/APP/6.2] is submitted with the Applicant's DCO application. The detailed measures would be developed in accordance with this outline plan and approved by the relevant local authority, pursuant to the DCO.
The proposals would have an industrialising effect on the landscape.	<p>The Applicant does not consider that the Scheme as presented will industrialise the local area.</p> <p>A suite of specialist reports have been undertaken by the Applicant to assess the potential impacts resulting from the Scheme. These include a full landscape and visual impact assessment alongside a landscape character assessment and a description of the landscape character areas that surround the Scheme.</p> <p>The landscape and visual assessment in Chapter 10 of the Environmental Statement [EN010106/APP/6.1]</p> <p>Taking into account the feedback from the PEI Report and the results of the specialist surveys and studies a suite of landscape mitigation measures and design changes have been proposed to mitigate the impacts of the Scheme. This has included the removal of some areas previously suggested for solar use; the addition of 'set back' areas from field edges closest to human receptors and the introduction of a large amount of tree and grassland planting.</p> <p>These measures are shown on the Parameter Plans in figures 3-1 and 3-2 of the ES [EN010106/APP/6.3].</p>
The PEI Report underestimates the	The Applicant has considered the landscape and visual impacts of the

Matter raised	Regard had to comment by the Applicant
negative visual impact of the proposals.	<p>Scheme extensively, as set out in Chapter 10 of the Environmental Statement, via a Landscape and Visual Impact Assessment [EN010106/APP/6.1]. The Applicant has further amended the Scheme design following the statutory consultation having regard to the feedback received and with reference to the Parameter plans in the Environmental Statement [EN010106/APP/6.3] these changes are:</p> <p>Sunnica East Site A - the extent of proposed solar panels remains to the east of Beck Road, with panels removed from E07 (now shown as EC02 in Figure 3-1 of the ES [EN010106/APP/6.3], so that the land to the west of Beck Road (ECO1 and ECO2) will be used for ecological mitigation. This will retain the open character of the landscape between Freckenham and Isleham to the west of Beck Road. ECO1 is also shown in Figure 3-1 of the ES [EN010106/APP/6.3].</p> <p>Sunnica East Site B - Parcels E11 and E23 are no longer proposed for solar development and will be for ecological mitigation and additional offsets from Worlington. These areas form part of ECO3 (shown in Figure 3-1 of the ES [EN010106/APP/6.3]) which will also reduce the extent of panels in relation to U6006. A new permissive path has been included across Sunnica East Site B, to provide access from Red Lodge to Worlington and Golf Links Road, via U6006. The Scheme also incorporates additional landscape buffers in relation to the BESS at E18 and E33. These are also shown in Figure 3-1 of the ES</p>

Matter raised	Regard had to comment by the Applicant
	<p>[EN010106/APP/6.3].</p> <p>Sunnica West Site A - the extent of proposed solar development has been reduced, with the removal of parcels W13, W14 and W16 (shown in Figure 4-5 of the ES [EN010106/APP/6.3]) from the Order limits. The extent of proposed development has also been reduced in W15 (shown in Figure 3-2 of the ES [EN010106/APP/6.3]), with increased set backs from the local road networks.</p>
<p>Trees do not provide mitigation all year round.</p>	<p>The landscape and visual assessment in Chapter 10 of the Environmental Statement [EN010106/APP/6.1] includes an assessment of winter conditions and summer conditions, and therefore the Applicant has taken into account the fact that trees lose their leaves in autumn.</p>
<p>The view from the Limekilns cannot be mitigated.</p>	<p>The Applicant's Landscape and Visual Impact Assessment has considered the impact from the Limekilns through visual receptor 38 as set out in Chapter 10 of the Environmental Statement [EN010106/APP/6.1]. The Scheme is judged to have a residual significant adverse effect in relation to people's view; however, mitigation is embedded within the design, via the tonal rendering of the BESS, additional planting and retention of existing vegetation such that the effects are predicted to be moderate adverse, rather than major adverse.</p>
<p>The landscape around Freckenham is not flat.</p>	<p>The extent of proposed development has been reduced following consultation, so that there are no PV modules to the west of Beck Road and in proximity to Freckenham. The proposed panels in the grounds of Lee</p>

Matter raised	Regard had to comment by the Applicant
	<p>Farm will be bordered by retained vegetation and new planting, such that there will be intermediate planting to mitigate the visual effects. The assessment has taken this planting in to account. Further details of the Applicant's proposed planting and the assessment of effects can be found in Chapter 10 of the Environmental Statement [EN010106/APP/6.1].</p>
<p>A buffer area is required around the avenue at Chippenham Hall.</p>	<p>The Applicant has revised the Scheme design in this area and is incorporating greater setbacks with a new planting regime along the avenue at parcels W04 and W05 (shown in Figure 3-2 of the ES [EN010106/APP/6.3]).</p> <p>The Works Plans [EN010106/APP/2.2] show the limits of land within the Order limits on which it is proposed to develop solar PV panels, together with the land which would be used for screening and planting.</p>
<p>Views from Dalham Hall will be harmed.</p>	<p>The Applicant has developed its assessment of the Scheme's impact on heritage assets in accordance with relevant guidance and best practice, in consultation with statutory bodies including Historic England and the local authorities. The results of this assessment and the Applicant's proposed mitigation are set out in Chapter 7 of the Environmental Statement [EN010106/APP/6.1]. With regards to Dalham Hall, the Applicant has considered the wider landscape and has not identified any effects on this asset.</p>

Heritage assets

6.2.63 Consultees that provided substantive comments relating to heritage assets included:

- | | |
|---|---|
| <ul style="list-style-type: none"> a. Cambridgeshire County Council; b. East Cambridgeshire District Council; c. Snailwell Parish Council; d. Suffolk County Council; e. West Suffolk Council; | <ul style="list-style-type: none"> f. Worlington Parish Council; g. Isleham Parish Council; h. Freckenham Parish Council; i. Fordham Parish Council; and, j. Historic England. |
|---|---|

6.2.64 The matters most commonly raised by the above consultees included:

- a. The sites have areas of high archaeological potential that require appropriate trial trenching coverage;
- b. Key land parcels need to be surveyed as there could still be significant archaeological finds;
- c. Parcels W04 and W05 need to be set back as far as possible from the avenue at Chippenham Hall;
- d. Additional photomontages of scenes from heritage assets would be welcome;
- e. Additional planting along the avenue is appropriate to mitigate harm;
- f. The Applicant should explore restricted easements to protect archaeological sites;
- g. Concern for impacts on local barrows, and
- h. Waterlogged deposits will require assessment of how the Scheme impacts the surrounding conditions.

6.2.65 The Applicant has had regard to all comments relating to heritage assets in **Appendix J-1** and **Appendix J-2**. With regard to the matters raised in 6.2.64 above, the Applicant has set out its approach in **Table 6-16** below.

Table 6-16 Regard had to comments received from Section 42(1)(a) and (b) consultation relating to heritage assets

Matter raised	Regard had to comment by the Applicant
The sites have areas of high archaeological potential that require appropriate trial trenching coverage.	Following the conclusion of the statutory consultation, the Applicant has continued to carry out archaeological assessment alongside evaluation fieldwork, including geophysical survey and trial trenching. The outcomes of

Matter raised	Regard had to comment by the Applicant
	<p>these assessments have resulted in several areas of significant archaeological activity being removed from the footprint of the Scheme. The full results of the Applicant's assessments carried out in relation to heritage can be found in Chapter 7 Cultural Heritage of the Environmental Statement [EN010106/APP/6.1] submitted as part of the DCO application.</p>
<p>Key land parcels need to be surveyed as there could still be significant archaeological finds.</p>	<p>Geophysical survey and trial trench evaluation of all accessible areas has been carried out across the scheme. The scope and extent of the trial trench evaluation works has been agreed following consultation with the archaeological services teams for Suffolk County Council (SCC) and Cambridgeshire County Council (CCC). Mitigation measures (including avoidance and proposals for further archaeological fieldwork) are set out within Chapter 7 of the Environmental Statement [EN010106/APP/6.1] and have been agreed formally via an overarching methodology document (WSI or similar) prior to the beginning of any programme of trenching works. Moving forward post consent, the Applicant has committed to the preparation of a Detailed Archaeological Mitigation Strategy (DAMS) document, which will set out the mitigation works (both in terms of archaeological fieldwork and preservation <i>in-situ</i>). This will be prepared following consultation the archaeological services teams for SCC and CCC, and in line with a mitigation brief issued by them.</p>
<p>Parcels W04 and W05 need to be set back as far as possible from the avenue</p>	<p>The Applicant has revised the Scheme design in this area and is incorporating greater setbacks with a new planting regime along the avenue at parcels</p>

Matter raised	Regard had to comment by the Applicant
at Chippenham Hall.	<p>W04 and W05 (shown in Figure 3-2 of the ES [EN010106/APP/6.3]).</p> <p>The Works Plans [EN010106/APP/2.2] show the limits of land within the Order limits on which it is proposed to develop solar PV panels, together with the land which would be used for screening and planting.</p>
Additional photomontages of scenes from heritage assets would be welcome.	<p>Chapter 7 of the Environmental Statement [EN010106/APP/6.1] includes an assessment of the Scheme's impacts on heritage assets through photomontages. These include views agreed with Historic England during the consultation process.</p>
Additional planting along the avenue is appropriate to mitigate harm.	<p>The Applicant has revised the Scheme design in this area and is incorporating greater setbacks with a new planting regime along the avenue at parcels W04 and W05 (shown in Figure 3-2 of the ES [EN010106/APP/6.3]). The Works Plans [EN010106/APP/2.2] show the limits of land within the Order limits on which it is proposed to develop solar PV panels, together with the land which would be used for screening and planting.</p>
The Applicant should explore restricted easements to protect archaeological sites.	<p>Discussions have taken place between AECOM's heritage team (on behalf of the Applicant) and the archaeological services teams for SCC and CCC re. the approach for the archaeological stripping, mapping and recording of the cable route and associated easement. All comments regarding easement width will be taken into consideration when finalising the methodology for the works (which would be carried out post-consent) and directional drilling techniques will be used to avoid the need for open cut trenching where</p>

Matter raised	Regard had to comment by the Applicant
	<p>practical. Geophysical surveys that have been undertaken over large proportions of the cable route has also allowed for avoidance measures to be employed where concentrations of archaeology have been encountered.</p>
<p>Concern for impacts on local barrows.</p>	<p>Chapter 7 of the Environmental Statement [EN010106/APP/6.1] includes an assessment of the Scheme's impacts on heritage assets through photomontages. These include views agreed with Historic England during the consultation process.</p> <p>The Applicant's DCO application documents include assessment of the Scheme's impacts on heritage assets through photomontages. These include views of the four bowl barrows (NHLE 1015246). The photomontages can be found in the Environmental Statement Figures 10-90 to 10-102 [EN010106/APP/6.3].</p> <p>The Applicant has carried out a landscape and visual impact assessment of W17 in relation to the surrounding area including the barrows. This assessment has found that the BESS and compound area proposed for this location would have a moderate adverse impact on designated and non-designated Bronze Age barrows forming the western extent of the Chippenham Barrow Cemetery. Full details of the assessment can be found in Chapter 7 of the Environmental Statement [EN010106/APP/6.1].</p>
<p>Waterlogged deposits will require assessment of how the Scheme impacts the surrounding conditions.</p>	<p>Following the statutory consultation, the Applicant has undertaken further assessment of the Scheme's potential impact on archaeological deposits through evaluation trial trenching,</p>

Matter raised	Regard had to comment by the Applicant
	<p>including deposits in waterlogged areas and organic archaeological remains. The methods and results of these surveys are included in Appendices 7H and 7I of the Environmental Statement [EN010106/APP/6.2] and Chapter 7 [EN010106/APP/6.2]. The Applicant has continued to engage with Historic England following the statutory consultation, including on the potential for archaeological deposits in water. The Applicant's assessment found that the Scheme is not predicted to have any impact on groundwater levels. More information is set out in Chapter 9 of the Environmental Statement [EN010106/APP/6.1].</p>

Transport and access

6.2.66 Consultees that provided substantive comments relating to transport and access included:

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|-------------------------------|--|
| a. Freckenham Parish Council; | i. Chippenham Parish Council; |
| b. Worlington Parish Council; | j. Anglian Water; |
| c. Isleham Parish Council; | k. Fordham Parish Council; |
| d. National Grid; | l. Cambridgeshire County Council; |
| e. Network Rail; | m. East Cambridgeshire District Council; |
| f. Highways England; | n. Suffolk County Council; and, |
| g. Department for Transport; | o. West Suffolk Council. |
| h. Snailwell Parish Council; | |

6.2.67 The matters most commonly raised by the above consultees included:

- Methodology for the assessments will need to be agreed with the highways authority prior to the submission of a DCO application;
- Care needs to be taken to protect the conditions of local highways;
- Preference for trenchless techniques to be used underneath highways;
- Details for levels of car sharing need to be agreed with the local authorities;

- e. Further information is required as to the impact of construction traffic on road safety;
- f. Further details are required on the proportion of the workforce who will be local to the sites;
- g. Further assessment of the proposed shift patterns is required;
- h. The Applicant should encourage cycle use and/or provide minibuses to transport workers to the sites;
- i. Golf Links Road is too narrow for construction vehicles;
- j. Further clarity needs to be provided as to the impact on users of the road network and impacts on key junctions;
- k. Parts of Elms Road will need to be widened and strengthened to accommodate construction traffic;
- l. Access may require the removal of hedgerows;
- m. Safeguard access to the sites for utilities; and,
- n. A monitoring regime will need to be put in place to ensure that movement figures are not exceeded.

6.2.68 The Applicant has had regard to all comments relating to transport and access in **Appendix J-1** and **Appendix J-2**. With regard to the matters raised in 6.2.67 above, the Applicant has set out its approach in **Table 6-17** below.

Table 6-17 Regard had to comments received from Section 42(1)(a) and (b) consultation relating to transport and access

Matter raised	Regard had to comment by the Applicant
Methodology for the assessments will need to be agreed with the highways authority prior to the submission of a DCO application.	The Applicant has continued to engage with the host authorities following the conclusion of the statutory consultation and through this engagement has agreed assessment methodologies with the highways authorities that have informed the development of the Applicant's Transport Assessment (Appendix 13B of the Environmental Statement [EN010106/APP/6.2]) and assessment of transport impacts contained within Chapter 13 of the Environmental Statement [EN010106/APP/6.1].
Care needs to be taken to protect the conditions of local highways.	The Applicant recognises the potential for construction traffic to impact upon local roads and is proposing to carry out

Matter raised	Regard had to comment by the Applicant
	<p>highway condition surveys to assess the condition of the roads before and after construction. As outlined in Section 6.2 of the Framework Construction Traffic Management Plan and Travel Plan (Appendix 13C of the Environmental Statement (ES) [EN010106/APP/6.2]). The roads that would be subject to such surveys will be discussed with the local highway authorities before the beginning of the examination, if it is accepted, with a view to reaching agreement before the examination closes. The CTMP will be secured by way of a requirement to the DCO</p> <p>The Applicant is proposing that wheel washing facilities will be provided – this is detailed within Section 6 of the Framework CTMP and TP [EN010106/APP/6.2] and a measure is included within Appendix 16C: Framework Construction Environmental Management Plan of the Environmental Statement [EN010106/APP/6.2].</p>
<p>Preference for trenchless techniques to be used underneath highways.</p>	<p>The Applicant recognises the importance of reducing disruption to road users when trenching across public highways. As a result, the time taken to cross public highways will be kept to a minimum and where possible the public highway will be kept at least partially open during this process and a traffic management system will be put in place. Public highways will be reinstated following backfilling of trenches. Further information on this is provided in Chapter 13 - Transport and Access of the Environmental Statement [EN010106/APP/6.1].</p>
<p>Details for levels of car sharing need to be agreed with the local authorities.</p>	<p>Information is provided in Section 5 of the Transport Assessment (Appendix 13B of the Environmental Statement</p>

Matter raised	Regard had to comment by the Applicant
	[EN010106/APP/6.2]) regarding the proposed car share factor. In the Framework Construction Traffic Management Plan and Travel Plan (Appendix 13C of the Environmental Statement [EN010106/APP/6.2]), management is identified in Section 6 and compliance and enforcement is identified in Section 7.
Further information is required as to the impact of construction traffic on road safety.	As detailed in Appendix 13B: Transport Assessment of the ES [EN010106/APP/6.2] of the ES, there are no issues of highway safety arising as a result of the construction, operation or decommissioning of the Scheme. The Applicant expects that construction staff would be using the local highway network between 06:00-07:00 and 19:00-20:00 and therefore outside of the traditional highway peak hours. Further information can be found in Chapter 13 Transport and Access of the Environmental Statement [EN010106/APP/6.1], Appendix 13B Transport Assessment, and Appendix 13C Framework Construction Traffic Management Plan and Travel Plan of the ES [EN010106/APP/6.2].
Further details are required on the proportion of the workforce who will be local to the sites.	The distribution of staff has been identified based on MSOAs within a 30km radius of the site which covers an approximate 45 minutes' drive which is consistent with the social-economic chapter. This is outlined in section 5.2 in the Transport Assessment (Appendix 13B of the Environmental Statement [EN010106/APP/6.2]).
Further assessment of the proposed shift patterns is required.	The Applicant has provided further information on the number of workers required on site and their anticipated shift patterns as part of the DCO application together with a description of

Matter raised	Regard had to comment by the Applicant
	<p>the measures that it would take in relation to construction worker traffic. Details can be found in the Framework Construction Traffic Management Plan and Travel Plan (Appendix 13C of the Environmental Statement [EN010106/APP/6.2]). Compliance with the Construction Traffic Management Plan and Travel Plan will be secured by a requirement included in the draft DCO [EN010106/APP/3.1]</p>
<p>The Applicant should encourage cycle use and/or provide minibuses to transport workers to the sites.</p>	<p>Details of measures to further reduce the numbers of construction worker vehicle movements are provided within the Framework Construction Traffic Management Plan and Travel Plan (Appendix 13C of the Environmental Statement [EN010106/APP/6.2]) including investigating the provision of a mini-bus service to local residential areas and railway stations. Compliance with the Construction Traffic Management Plan and Travel Plan will be secured by a requirement included in the draft DCO [EN010106/APP/3.1]</p>
<p>Golf Links Road is too narrow for construction vehicles.</p>	<p>The site access on Golf Links Road has been reviewed based on consultation feedback. The site access has been relocated to Newmarket Road and Sunnica vehicles are now not required to travel along Golf Links Road. Consultation with National Highways (previously Highways England) agreed on permitting Sunnica vehicles to turn left from the A11 onto Newmarket Road and left from Newmarket Road to the A11, prohibiting Sunnica vehicles to turn right at the A11/Newmarket Road junction. Details are provided within the Framework Construction Traffic Management Plan [EN010106/APP/6.2] and Travel Plan Section 3 and Annex C. Details of removal of vegetation is</p>

Matter raised	Regard had to comment by the Applicant
	covered within sections 8.8 and 10.8 of Chapter 8 Ecology and Nature Conservation and Chapter 10 Landscape and Visual Amenity [EN010106/APP/6.1]), respectively. The proposed temporary traffic regulation measures will be shown on the Traffic Regulation Measures Plans [EN010106/APP/2.4] and the locations of the site accesses are shown in the Access and Rights of Way plans [EN010106/APP/2.3].
Further clarity needs to be provided as to the impact on users of the road network and impacts on key junctions.	The Applicant has submitted a Transport Assessment (Appendix 13B of the Environmental Statement [EN010106/APP/6.2]) and a Construction Traffic Management Plan and Travel Plan (Appendix 13C of the Environmental Statement [EN010106/APP/6.2]) as part of its DCO application which details the HGV construction routes. Details of the traffic management and the site access reviews including swept path analysis and indicative junction layouts are provided in section 3 and Annex C within the Framework Construction Traffic Management Plan and Travel Plan (Appendix 13C of the Environmental Statement [EN010106/APP/6.2]).
Parts of Elms Road will need to be widened and strengthened to accommodate construction traffic.	Details of the proposed traffic management along Elms Road is provided within the Framework Construction Traffic Management Plan and Travel Plan (Appendix 13C of the Environmental Statement [EN010106/APP/6.2]), including swept path analysis, visibility splays and indicative junction layouts as well as traffic management during the construction phase. Widening of Elms Road is being proposed to ensure it is

Matter raised	Regard had to comment by the Applicant
	of adequate width.
Access may require the removal of hedgerows.	Access locations have been selected and designed to minimise vegetation removal as far as practicable. Site access reviews were undertaken which includes swept path analysis and indicative junction layouts as well as traffic management which is outlined in section 5 and annex C of the Framework CTMP and Travel Plan (Appendix 13C of the Environmental Statement [EN010106/APP/6.2]). These identified areas where vegetation will need to be trimmed / removed in order to allow safe access for vehicles. The need for vegetation removal has been assessed in Chapter 8 and Chapter 10 of the ES [EN010106/APP/6.1]/
Safeguard access to the sites for utilities.	<p>The Applicant has further engaged with utility providers including Cadent Gas following the conclusion of the statutory consultation and is aiming to conclude agreements to ensure suitable protective provisions for the operations of utilities</p> <p>The Applicant will continue to engage with utility providers subject to receiving development consent and preparing its final project design and during construction and operations.</p>
A monitoring regime will need to be put in place to ensure that movement figures are not exceeded.	The Applicant recognises the importance of appropriate enforcement and monitoring of employee vehicle movements during construction. The application includes a Framework Construction Traffic Management Plan and Travel Plan (Appendix 13C of the Environmental Statement [EN010106/APP/6.2]) which includes within Section 6 measures in relation to the monitoring of the efficacy of the traffic mitigation measures. The

Matter raised	Regard had to comment by the Applicant
	requirements of the draft DCO secure compliance with the measures included in the Framework Construction Traffic Management Plan and Travel Plan.

Water resources

6.2.69 Consultees that provided substantive comments relating to water resources included:

- | | |
|--|---------------------------------|
| a. Suffolk County Council; | e. Anglian Water; |
| b. West Suffolk Council; | f. Environment Agency; |
| c. Cambridgeshire County Council; | g. Isleham Parish Council; and, |
| d. East Cambridgeshire District Council; | h. Natural England. |

6.2.70 The matters most commonly raised by the above consultees included:

- Suggestion of a sustainable drainage system (SuDS) based upon an infiltration strategy with pollution and sediment control;
- The need to follow regulations on distances of infrastructure from water courses;
- Solar PV panel heights in Flood Zone 3 should be set using height above sea level;
- The Applicant should use the Government's Guiding Principles for Land Contamination to address contamination risk;
- Further reassurance is required as to the hydrological impact on wildlife sites;
- Concern at the potential for groundwater contamination during the Scheme's operating life;
- Regular inspections should be undertaken during operations to guard against the risk of chemical leaks; and,
- Concern at the potential impact on Lee Brook.

6.2.71 The Applicant has had regard to all comments relating to water resources in **Appendix J-1** and **Appendix J-2**. With regard to the matters raised in 6.2.70 above, the Applicant has set out its approach in **Table 6-18** below.

Table 6-18 Regard had to comments received from Section 42(1)(a) and (b) consultation relating to water resources

Matter raised	Regard had to comment by the Applicant
<p>Suggestion of a sustainable drainage system (SuDS) based upon an infiltration strategy with pollution and sediment control.</p>	<p>The Applicant has considered the relationship between the Scheme's proposed infiltration SuDS and viable pollutant linkages. Further information can be found in Chapter 9 of the Environmental Statement [EN010106/APP/6.1].</p> <p>The Applicant has submitted updated details of the proposed SuDS in the drainage strategy and the Flood Risk including Drainage Technical Note in Appendix 9C of the Environmental Statement [EN010106/APP/6.2].</p>
<p>The need to follow regulations on distances of infrastructure from water courses.</p>	<p>The Applicant notes this response and has continued to engage with the Environment Agency following the conclusion of the statutory consultation. Following the close of the statutory consultation the Applicant has been discussing with the Environment Agency appropriate terms that would enable flood risk activity environmental permits to be incorporated within the DCO, subject to agreement being reached on appropriate protective provisions.</p>
<p>Solar PV panel heights in Flood Zone 3 should be set using height above sea level.</p>	<p>The Applicant has proposed height for PV modules within flood zone 3 using mAOD. The Applicant has provided further details as to how it proposes to manage construction at the parts of the Scheme within flood zone 3. This can be found in Appendix 9C Flood Risk Assessment including a Drainage Technical Note [EN010106/APP/6.2] and Appendix 16C Construction Environmental Management Plan (CEMP) of the Environmental Statement [EN010106/APP/6.2].</p>

Matter raised	Regard had to comment by the Applicant
<p>The Applicant should use the Government's Guiding Principles for Land Contamination to address contamination risk.</p>	<p>The required site investigations will be carried out post consent, as stated within Chapter 9 of the Environmental Statement [EN010106/APP/6.1]. In preparing its proposals, the Applicant will follow relevant guidance including the requirements of the National Planning Policy Framework and the Environment Agency Guiding Principles for Land Contamination. This approach was discussed during the consultation meeting on 16 April 2021.</p>
<p>Further reassurance is required as to the hydrological impact on wildlife sites.</p>	<p>The Applicant has provided additional information relating to the proposed drainage system for the Scheme within Appendix 9C Flood Risk Assessment, including Drainage Strategy [EN010106/APP/6.2]. This proposes to mimic natural drainage, and uses above ground grassed channels, or swales, to pick up overland flows. There are no tile drains or underground drains as part of the Scheme.</p> <p>The proposed drainage system has been designed in order to minimise impacts such as hydrological changes. The Scheme is not anticipated to cause impacts upon the Chippenham Fen RAMSAR and Fenland SAC. The groundwater flow which supports the fens will not be impeded by the Scheme. Peat deposits are located within the SAC site and do not extend across the Order limits so will not be impacted. The Battery Energy Storage System (BESS) will be within containers, and self contained. This allows the drainage system within the containers to be managed and separated from surface water drainage. This has been considered in Chapter 9 of the Environmental Statement [EN010106/APP/6.1] and the drainage</p>

Matter raised	Regard had to comment by the Applicant
	strategy.
<p>Concern at the potential for groundwater contamination during the Scheme's operating life.</p>	<p>The Scheme will have an Environmental Management Plan in place for the operation and maintenance of the Scheme. This will include measures to regulate the environmental effects of the operational phase of the Scheme including measures to manage the risk from pollution from small leaks and spillages from proposed maintenance activities. A Framework Operational Environmental Management Plan (OEMP) is provided within Appendix 16F of the ES [EN010106/APP/6.2].</p> <p>The Environmental Management Plan will include a schedule for regular visual inspection of the PV modules. Through observation of any structural defects in the PV module the Applicant will be removed. The panels are constructed in a robust manner and their components cannot be separated except with a considerable mechanical load. Therefore, the risk of any liquid leakage from the panels is very low.</p>
<p>Regular inspections should be undertaken during operations to guard against the risk of chemical leaks.</p>	<p>The Scheme will have an Environmental Management Plan in place for the operation and maintenance of the Scheme. This will include measures to regulate the environmental effects of the operational phase of the Scheme including measures to manage the risk from pollution from small leaks and spillages from proposed maintenance activities.</p> <p>The Environmental Management Plan will include a schedule for regular visual inspection of the solar PV panels. Through observation of any structural defects in the solar PV the Applicant will be removed. The panels are constructed in a robust manner and their components cannot be separated</p>

Matter raised	Regard had to comment by the Applicant
	<p>except with a considerable mechanical load. Therefore, the risk of any liquid leakage from the panels is very low. Details of the Embedded mitigation measures can be found in Chapter 9 of the Environmental Statement [EN010106/APP/6.1].</p>
<p>Concern at the potential impact on Lee Brook.</p>	<p>The internal cables within Sunnica East Site A will need to cross the Lee Brook in two places. Non-intrusive drilling techniques will be used to install cables underneath the bed of this watercourse, as well as 20 additional watercourses and ditches assessed to have sensitive habitats and species for cable crossings throughout the Order limits. This will avoid the need to excavate trenches through the watercourses. Trenchless techniques will require a launch pit to be excavated at the starting point for the machinery to drill from and a reception pit to be excavated at the end point where the machinery will drill to. These pits will be dug to a minimum distance of 10m from watercourses to avoid disturbing the margins and channel.</p> <p>Details of the biodiversity net gain calculations are provided in Chapter 8: Ecology and Nature Conservation of the Environmental Statement [EN010106/APP/6.1] and Appendix 10I Outline LEMP of the Environmental Statement [EN010106/APP/6.2].</p>
<p>Construction needs to be carefully managed to prevent pollution.</p>	<p>The Applicant has continued to engage with the Environment Agency following the conclusion of the statutory consultation, this includes discussions regarding the management of construction activities to minimise impacts to water resources and potential dewatering where shallow pits may need to be dug temporarily for the installation of cabled beneath</p>

Matter raised	Regard had to comment by the Applicant
	<p>watercourses and the railway line. The Applicant has prepared a Framework Construction Environmental Management Plan (CEMP) in Appendix 16C of the Environmental Statement [EN010106/APP/6.2] that includes measures to ensure the safety of water resources during the Scheme's construction phase.</p> <p>This includes: controls for surface water runoff, details of management for fuel storage and vehicle washing, management of spillage risk, use of plant nappies etc.</p> <p>Further details can also be found in Chapter 9 of the Environmental Statement [EN010106/APP/6.1].</p>

Human health

6.2.72 Consultees that provided substantive comments relating to human health included:

- | | |
|--|-------------------------------|
| a. Suffolk County Council; | g. Chippenham Parish Council; |
| b. West Suffolk Council; | h. Fordham Parish Council; |
| c. Cambridgeshire County Council; | i. Freckenham Parish Council; |
| d. East Cambridgeshire District Council; | j. Worlington Parish Council; |
| e. Health and Safety Executive; | k. Isleham Parish Council; |
| f. Snailwell Parish Council; | and, |
| | l. Kennett Parish Council. |

6.2.73 The matters most commonly raised by the above consultees included:

- General concern at the potential of a fire caused by the BESS;
- An Outline Battery Fire Safety Management Plan needs to be submitted with the DCO application;
- The BESS element should be located away from residential areas;
- The Applicant should develop an emergency response plan in consultation with the local fire services;

- e. All the appropriate regulations should be followed in designing and installing the BESS. Safety features should be designed into the Scheme to reduce the risk of a fire;
- f. The Scheme should be registered under Control of Major Accident Hazards (COMAH) regulations;
- g. Further details should be provided as to the safety of electromagnetic fields; and,
- h. The EIA activity should take into account the needs of people with protected characteristics and give thought to mental health and well-being.

6.2.74 The Applicant has had regard to all comments relating to water resources in **Appendix J-1** and **Appendix J-2**. With regard to the matters raised in 6.2.73 above, the Applicant has set out its approach in **Table 6-19** below.

Table 6-19 Regard had to comments received from Section 42(1)(a) and (b) and Section 42 consultation relating to human health

Matter raised	Regard had to comment by the Applicant
General concern at the potential of a fire caused by the BESS.	<p>The Applicant has prepared an Outline Battery Fire Safety Management Plan [EN010106/APP/7.6] as part of its DCO application. This plan has been developed in consultation with the local fire authorities and shared with the Health and Safety Executive. Subject to the Scheme receiving development consent, this plan will be updated following detailed design, and requires the approval of the relevant planning authorities prior to the beginning of construction of the BESS. The relevant planning authorities are required to consult with the Health and Safety Executive, and Fire and Rescue Services before determining whether to approve the strategy.</p> <p>An Unplanned Atmospheric Emissions from Battery Energy Storage Systems Report is provided in Appendix 16D of the Environmental Statement [EN010106/APP/6.2]. This concluded that, in the unlikely event that a fire were to break out in a single cell or module it is very unlikely, given the</p>

Matter raised	Regard had to comment by the Applicant
	control measures, that the fire would spread to the rest of the BESS. Even should all the systems fail and a large scale fire break out within one of the BESS containers then the resultant hydrogen fluoride concentration at the closest receptors would be below the level that Public Health England has identified as resulting in notable discomfort to members of the general population.
An Outline Battery Fire Safety Management Plan needs to be submitted with the DCO application.	The Applicant has prepared an Outline Battery Fire Safety Management Plan [EN010106/APP/7.6] as part of its DCO application. This plan has been developed in consultation with the local fire authorities and shared with the Health and Safety Executive. Subject to the Scheme receiving development consent, this plan will be updated following detailed design, and requires the approval of the relevant planning authorities prior to the beginning of construction of the BESS. The relevant planning authorities are required to consult with the Health and Safety Executive, and Fire and Rescue Services before determining whether to approve the strategy.
The BESS element should be located away from residential areas.	The Applicant takes the fire risk posed by the BESS element of the Scheme very seriously and has prepared an Outline Battery Fire Safety Management Plan [EN010106/APP/7.6]. The Plan has been developed through consultation with the local planning authorities, the Suffolk Fire and Rescue Service (who have also responded on behalf of the Cambridgeshire Fire and Rescue Service) and has also been shared with the Health and Safety Executive. Subject to the Scheme receiving development consent, this

Matter raised	Regard had to comment by the Applicant
	<p>strategy will be updated following detailed design, and requires the approval of the relevant planning authorities prior to the beginning of construction of the BESS. The relevant planning authorities are required to consult with the Health and Safety Executive, and Fire and Rescue Services before determining whether to approve the strategy.</p>
<p>The Applicant should develop an emergency response plan in consultation with the local fire services.</p>	<p>The Applicant has submitted an Outline Battery Fire Safety Management Plan [EN010106/APP/7.6] as part of its DCO application. This strategy has been developed through consultation with the Suffolk and Rescue Department and has incorporated their requirements. A requirement to Schedule 2 of the DCO will require the approval and implementation of the final Battery Fire Safety Management Plan, prior to commencement of the Scheme, at which time the plan will have been further developed so that it reflects the final Scheme design. The approval of the final plan is proposed to be by the relevant planning authorities in consultation with the Health and Safety Executive, the Cambridgeshire Fire and Rescue Service and the Suffolk Fire and Rescue Service.</p> <p>A requirement of the Outline Battery Fire Safety Management Plan is the production of an emergency response plan.</p>
<p>All the appropriate regulations should be followed in designing and installing the BESS. Safety features should be designed into the Scheme to reduce the risk of a fire.</p>	<p>The Applicant has prepared an Outline Battery Fire Safety Management Plan [EN010106/APP/7.6] as part of its DCO application to evaluate and mitigate the risk of fire from the BESS. This document has been developed through consultation with the relevant statutory authorities.</p>

Matter raised	Regard had to comment by the Applicant
	<p>The document has set out a number of design choices that the Applicant has made to ensure the safety of the BESS including: separation distance between the containers, fire safety infrastructure such as available sources of water for fire fighting and access points in case of emergency for the fire services.</p>
<p>The Scheme should be registered under Control of Major Accident Hazards (COMAH) regulations.</p>	<p>Under present regulations, the Applicant would not be required to register the BESS facilities with COMAH. The Applicant is nevertheless committed to ensuring the safe operation of the BESS and will continue to engage with the local authorities on this matter.</p>
<p>Further details should be provided as to the safety of electromagnetic fields.</p>	<p>The Applicant has consulted with local Care Commissioning Groups as part of the statutory consultation.</p> <p>The Applicant has considered the impact of electromagnetic fields on human health and has consulted with Public Health England in relation to this point at the Environmental Impact Assessment (EIA) scoping stage.</p> <p>The impact of electromagnetic fields on human health was scoped out of the Environmental Impact Assessment (EIA) and this approach was agreed by the Planning Inspectorate at the scoping stage undertaken in 2019. This was because it was considered that the proposed Sunnica Energy Farm did not present any significant risk to human health. Further information is available within the Scoping Opinion [EN010106/APP/6.2]. Public Health England did not raise a concern with this approach when consulted on the scoping report.</p>

Matter raised	Regard had to comment by the Applicant
<p>The EIA activity should take into account the needs of people with protected characteristics and give thought to mental health and well-being.</p>	<p>During further consultation with Suffolk County Council it was agreed that a Equality Impact Assessment was not required for the Scheme.</p> <p>The ES gives consideration to the well-being of residents in the coverage of the Human Health assessment in Chapter 12 of the Environmental Statement [EN010106/APP/6.1]. Access to Healthcare Services and other Social Infrastructure is included, as is Social Cohesion and Lifetime Neighbourhoods, both key areas to well-being. Consideration is given to the potential for impacts on mental health albeit indirectly through assessing an outcome in respect of each of these determinants. The assessment has shown that there is a potential for negative impacts as a result of the Scheme; however, these are temporary.</p>

Glint and glare

6.2.75 Consultees that provided substantive comments relating to glint and glare included:

- | | |
|--|----------------------------|
| a. Cambridgeshire County Council; | c. Suffolk County Council; |
| b. East Cambridgeshire District Council; | d. West Suffolk Council; |
| | e. Highways England; and, |
| | f. Isleham Parish Council. |

6.2.76 The matters most commonly raised by the above consultees included:

- General concern at the potential impact of glint and glare;
- Concern at the possible delay in planting becoming established and mitigating the effects of glint and glare;
- Concern at the impact on equestrian users in the area;
- The Applicant should provide additional details as to why mitigation is proposed for the A14 and not the A11; and,
- Concern at the potential impact of glint and glare on the operations of RAF Mildenhall and RAF Lakenheath.

6.2.77 The Applicant has had regard to all comments relating to glint and glare in **Appendix J-1** and **Appendix J-2**. Comments relating to glint and glare are included within the landscape and visual amenity, and transport and access topic areas. With regard to the matters raised in 6.2.76 above, the Applicant has set out its approach in **Table 6-20** below.

Table 6-20 Regard had to comments received from Section 42(1)(a) and (b) consultation relating to glint and glare

Matter raised	Regard had to comment by the Applicant
General concern at the potential impact of glint and glare.	The Applicant has considered the potential glint and glare impacts of the Scheme in Appendix 16A Glint and Glare Assessment [EN010106/APP/6.2] submitted with the Applicant's DCO application. Details of the viewpoints assessed can be found in the Environmental Statement Figures [EN010106/APP/6.2] and Chapter 10 of the Environmental Statement [EN010106/APP/6.1].
Concern at the possible delay in planting becoming established and mitigating the effects of glint and glare.	It is standard practice to base an assessment of the proposed mitigation that is proposed as part of the EIA process and therefore it is appropriate for the Glint and Glare assessment to adopt this approach. The Applicant is following established best practice in providing embedded mitigation within the Scheme's design, this includes the proposed planting. The requirements of construction mean that it is not appropriate to carry out such planting prior to the end of the construction phase. This maximises the likelihood of the planting surviving and establishing itself. Further details of the Applicant's proposed planting can be found in Appendix 10I: Outline LEMP of the Environmental Statement [EN010106/APP/6.2].
Concern at the impact on equestrian users in the area.	The Applicant has considered the potential glint and glare impacts of the Scheme in Appendix 16A Glint and

Matter raised	Regard had to comment by the Applicant
	<p>Glare Assessment [EN010106/APP/6.2] submitted with the Applicant's DCO application. This assessment has considered the glint and glare impact, and wider visual impact on equestrian receptors. Details of the viewpoints assessed can be found in the Environmental Statement Figures [EN010106/APP/6.2] and Chapter 10 of the Environmental Statement [EN010106/APP/6.1].</p>
<p>The Applicant should provide additional details as to why mitigation is proposed for the A14 and not the A11.</p>	<p>The Applicant has provided additional detail as to why glint and glare mitigation is not required on the A11 in Appendix 16A Glint and Glare Assessment of the ES [EN010106/APP/6.2]. As is noted in that assessment, the modelling was carried out on an earlier design iteration that is greater in scale than that proposed in the DCO Application. The results of the Glint and Glare Assessment are therefore conservative.</p>
<p>Concern at the potential impact of glint and glare on the operations of RAF Mildenhall and RAF Lakenheath.</p>	<p>The Applicant has assessed the Scheme's potential impact on glint and glare. The assessment is provided in Appendix 16A Glint and Glare Assessment of the Environmental Statement [EN010106/APP/6.2] submitted as part of the Applicant's DCO application.</p> <p>The assessment concluded that the Scheme will have no impact on RAF Mildenhall as no solar reflections are predicted for any of the scoped and assessed aviation receptors. No detailed modelling was recommended for RAF Lakenheath as no significant effects are expected given the considerable distance of the airfield to the Scheme.</p>

Renewable energy/Climate change

6.2.78 Consultees that provided substantive comments relating to renewable energy and climate change included:

- | | |
|--|-------------------------------|
| a. Cambridgeshire County Council; | f. Freckenham Parish Council; |
| b. East Cambridgeshire District Council; | g. Worlington Parish Council; |
| c. Suffolk County Council; | h. Isleham Parish Council; |
| d. West Suffolk Council; | and, |
| e. Chippenham Parish Council; | i. Kennett Parish Council. |

6.2.79 The matters most commonly raised by the above consultees included:

- a. Assessment of the impact on carbon emissions from the change in land use and resulting impacts on carbon sequestration should be provided as part of the ES;
- b. The Applicant should provide detail of the Scheme's generating capacity to allow benefits to be calculated;
- c. Wind energy is more efficient than solar and should be prioritised;
- d. The construction of the Scheme should meet environmental best practice;
- e. The Scheme should maximise recycling during construction;
- f. The lifetime carbon emissions of the Scheme (manufacturing, construction, operations and decommissioning) need to be considered in further detail;
- g. The Scheme would result in increased food imports from abroad that would create additional greenhouse gas emissions; and,
- h. The Scheme is less effective in carbon saving terms when compared to multiple small-scale projects.

6.2.80 The Applicant has had regard to all comments relating to climate change in **Appendix J-1** and **Appendix J-2**. With regard to the matters raised in 6.2.79 above, the Applicant has set out its approach in **Table 6-21** below.

Table 6-21 Regard had to comments received from Section 42(1)(a) and (b) consultation relating to climate change

Matter raised	Regard had to comment by the Applicant
<p>Assessment of the impact on carbon emissions from the change in land use and resulting impacts on carbon sequestration should be provided as part of the ES.</p>	<p>The Applicant has considered the impact of the Scheme on carbon sequestration in Chapter 6 Climate Change of the Environmental Statement [EN010106/APP/6.1].</p> <p>Land use change as a result of the Scheme is anticipated to have a beneficial GHG impact of around 100,000 tonnes carbon dioxide equivalent (tCO₂e), largely due to the conversion of large areas of cropland to grassland, which has a higher carbon sequestration value than cropland. However, it is assumed that the new areas of grassland will be returned to cropland following decommissioning of the Scheme. The beneficial GHG impact from land use change is therefore considered to only be temporary (approximately 40 years), and has therefore been excluded from the lifecycle GHG impact assessment. The Applicant has provided further information with regard to lifecycle GHG emissions in Chapter 6 Climate Change of the Environmental Statement [EN010106/APP/6.1].</p>
<p>The Applicant should provide detail of the Scheme's generating capacity to allow benefits to be calculated.</p>	<p>The Applicant did not provide details of the Scheme's generating capacity at the PEIR stage because improvements in technology could mean that the Sunnica Energy Farm has the potential to generate additional renewable electricity during its operating life than that outlined during the Scoping Opinion stage. It would not therefore make sense for the Applicant to be tied to a generating capacity that could prove less efficient in the future. Such an approach is common across longer term renewable energy projects and the Applicant has not specified a generating capacity in the Draft DCO</p>

Matter raised	Regard had to comment by the Applicant
	<p>[EN010106/APP/3.1] submitted as part of its DCO application. The development (including of the solar generating station and BESS) will instead be controlled and limited by the DCO requirements, areas shown on the works plans, design principles (which include maximum parameters) and impacts assessed in the ES.</p> <p>An assumption has been made as to the annual production from the site in terms of kWh in order to calculate the potential impact on the climate. Details of this calculation can be found within Chapter 6 - Climate Change of the Environmental Statement [EN010106/APP/6.1].</p>
<p>Wind energy is more efficient than solar and should be prioritised.</p>	<p>The Applicant is of the view that the Scheme is not an alternative to wind powered energy generation but will compliment such forms of generation in providing much needed new renewable energy to the national electricity grid.</p> <p>The Applicant has provided a Statement of Need [EN010106/APP/7.1] as part of its DCO application setting out the relevance of the project in the context of the need for new renewable energy generation more widely. The Applicant considers the Statement of Need to provides a robust summary of the benefits of the proposed Scheme and solar generation and storage more widely.</p>
<p>The construction of the Scheme should meet environmental best practice.</p>	<p>A Framework CEMP has been submitted as part of the DCO Application in Appendix 16C of the Environmental Statement [EN010106/APP/6.2]. Specific reporting measures as informed by the findings of the ES are captured in this document. The Scheme has a range of embedded</p>

Matter raised	Regard had to comment by the Applicant
	mitigation measures which will contribute ensuring the scheme is sustainable and will contribute to the UKs net-zero target. However, the Scheme is not required to carry out a CEEQUAL assessment and the Applicant has considered that the embedded mitigation measures within the Scheme ensure a highly sustainable Scheme.
The Scheme should maximise recycling during construction	A Construction Resource Management Plan (CRMP) as set out in the Framework CEMP in Appendix 16C of the Environmental Statement [EN010106/APP/6.2] will be prepared for the Scheme at detailed design stage. Fuel usage and waste management procedures for the Scheme and approach are set out in the Framework CEMP in Appendix 16C of the Environmental Statement [EN010106/APP/6.2].
The lifetime carbon emissions of the Scheme (manufacturing, construction, operations and decommissioning) need to be considered in further detail.	<p>The lifecycle GHG impact assessment undertaken by the Applicant, as presented in Chapter 6 Climate Change of the Environmental Statement [EN010106/APP/6.1], considers all GHG emissions arising over the lifecycle of the Scheme (including construction, operation and decommissioning), and has been carried out in accordance with the IEMA guidance for assessing GHG emissions within Environmental Impact Assessment.</p> <p>The Applicant is of the view that the development can be described as sustainable. The Scheme is answering an urgent national need for forms of low carbon, renewable energy generation. The GHG intensity of the Scheme compares favourably with the projected grid GHG intensity, as well as with</p>

Matter raised	Regard had to comment by the Applicant
	<p>alternative energy generation types, and it is estimated that an additional 1,118,011 tCO₂e would be emitted to generate the equivalent amount of electricity over the operational lifetime of the Scheme from the projected grid energy mix.</p>
<p>The Scheme would result in increased food imports from abroad that would create additional greenhouse gas emissions.</p>	<p>The change in agricultural land-use within the Order limits and any direct effects due to this are analysed in Chapter 12 of the Environmental Statement [EN/1010106/APP/6.1].</p> <p>The scope of the EIA, further to the issue of the Scoping Opinion by the Planning Inspectorate (ES Appendix 1B [EN/1010106/APP/6.2]) does not include an assessment on food security. The Applicant recognises that the role of the planning system to assess the balance of the impact of withdrawing land from agricultural production for a period of time against the benefits of renewable energy generation. A fallow period will allow recovery of soil organic matter and remediate deep compaction from cultivation. Non-food crops are already grown in this area and on land within the Sites, including crop maize for anaerobic digesters and forage for the prominent local equestrian sector.</p>
<p>The Scheme is less effective in carbon saving terms when compared to multiple small-scale projects.</p>	<p>The Applicant is of the view that the proposed Sunnica Energy Farm is not an alternative to a number of other, smaller, solar developments but will compliment them in providing much needed new renewable energy to the national electricity grid. The proposed Sunnica Energy Farm will generate a significant volume of renewable energy over the duration of its operating life. The Applicant has provided analysis within the Statement of Need</p>

Matter raised	Regard had to comment by the Applicant
	[EN010106/APP/7.1] that sets out the benefits created by larger, single, solar projects in being able to deliver low carbon electricity more quickly and at a lower cost than multiple independent schemes which make up the same generating capacity.

Economy

6.2.81 Consultees that provided substantive comments relating to the economic impact of the Scheme included:

- a. Suffolk County Council;
- b. West Suffolk Council;
- c. Cambridgeshire County Council;
- d. East Cambridgeshire District Council;
- e. Chippenham Parish Council;
- f. Freckenham Parish Council;
- g. Worlington Parish Council; and,
- h. Isleham Parish Council.

6.2.82 The matters most commonly raised by the above consultees included:

- a. The baseline data and assumptions made in the PEI Report with regard to the economic impact of the Scheme need to be revised;
- b. An assessment of the Scheme's potential impact on tourism should be undertaken;
- c. The local authorities wish to see employment growth around the A11 and the Scheme should not prejudice this ambition;
- d. The cumulative economic effects of the Scheme in conjunction with wider local developments needs to be considered;
- e. The Scheme should not cause any detrimental impact to the local horse racing industry and other local businesses;
- f. The Applicant should provide further details as to how additional job and training opportunities could be provided through the Scheme; and,
- g. Concern at the potential loss of farming jobs and the potential for few local long-term job opportunities.

6.2.83 The Applicant has had regard to all comments relating to economy in **Appendix J-1** and **Appendix J-2**. With regard to the matters raised in 6.2.82 above, the Applicant has set out its approach in **Table 6-22** below.

Table 6-22 Regard had to comments received from Section 42(1)(a) and (b) consultation relating to economy

Matter raised	Regard had to comment by the Applicant
The baseline data and assumptions made in the PEI Report with regard to the economic impact of the Scheme need to be revised.	The Applicant has further developed the methodology and baseline data used for its assessment of economic effects and has published an updated assessment outlined in Chapter 12 of the Environmental Statement [EN010106/APP/6.1]. As agreed with the Local Authorities, a bespoke study area has been used for the ES, which includes a 45-minute travel study area (by car) out from the Order limits. This acknowledges the fact that the Scheme will lead to outputs that benefit those in Thetford, Mildenhall and Bury St Edmunds. The ES Chapter has applied a higher rate of leakage in line with HCA Additionality Guidance 'ready reckoners'.

Matter raised	Regard had to comment by the Applicant
<p>An assessment of the Scheme's potential impact on tourism should be undertaken.</p>	<p>The scope of works for Socio-economics and Land Use as submitted in the Scoping Report to PINS proposed no assessment of effects on tourism with no specific receptors having been identified to justify such an assessment being needed. The Scoping Opinions responses received from PINS and all statutory consultees also did not request that such an assessment was required. On that basis, no assessment of effects on tourism has or will be undertaken. However, the Landscape and Visual Amenity Chapter of the PEIR (Chapter 10) does assess the impact on visitor views in the vicinity of the scheme and the loss of long distance views as relevant, including from PRowWs which provide the main opportunity for recreation in this otherwise predominantly agricultural area of the countryside. Accordingly, the Socio-Economics and Land Use Chapter (Chapter 12) has assessed impacts on PRowWs users which may include visitors to the area.</p>
<p>The local authorities wish to see employment growth around the A11 and the Scheme should not prejudice this ambition.</p>	<p>The Scheme is temporary, and decommissioning will be required at the end of its operating life. Furthermore, post construction, the operational impacts of Sunnica will be minimal.</p> <p>The Scheme is not expected to impede the delivery of future growth.</p> <p>The Applicant acknowledges the aspirations of West Suffolk Council to deliver a number of improvements in the area, to facilitate employment growth. The Environmental Statement has considered the cumulative effects of the Scheme with other developments approved and emerging in accordance with PINS Advice Note 17 Cumulative Effects Assessment. The planning history and weight given to the</p>

Matter raised	Regard had to comment by the Applicant
	emerging planning policy context is also considered in the Planning Statement [EN010106/APP/7.2].
The cumulative economic effects of the Scheme in conjunction with wider local developments needs to be considered.	Section 12.11 "Cumulative Effects" of Chapter 12 of the Environmental Statement [EN010106/APP/6.1] has assessed the potential effects of the Scheme in combination with the potential effects of other development schemes within the surrounding area for each impact in each respective phase (construction, operation and decommissioning). This includes construction employment, operation employment, PRoWs and impacts to residential properties, business premises and community facilities in the surrounding area.
The Scheme should not cause any detrimental impact to the local horse racing industry and other local businesses.	<p>The Applicant has engaged with the horse racing community from the launch of the Scheme through to the submission of its DCO application.</p> <p>Appendix 16A Glint and Glare Assessment of the ES [EN010106/APP/6.2] presents an assessment of the effects of glint and glare arising from the Scheme which is summarised in Chapter 16: Other Environmental Topics of the ES [EN010106/APP/6.1]. This concludes that horse racing facilities in the vicinity of the Order limits will not experience any significant adverse effects due to visibility of any panels being screened from view by existing vegetation and landform as well as the proposed mitigation planting. Prior to the planting being established the assessment concludes that these facilities would experience a low impact in terms of glint and glare due to the location of the solar reflection and reflections coinciding with direct sunlight.</p>

Matter raised	Regard had to comment by the Applicant
	<p>Engagement with Godolphin Management Group has led to the Applicant proposing temporary measures to minimise disturbance to horse racing uses abutting the boundary of Sunnica West Site A. Measures embedded into the design include not undertaking construction works within fields adjacent to 'The Gallops' on Sunnica West Site A prior to 10am to limit disruption to their horse training activities. Temporary fencing is also proposed to be installed locally along the boundary of Sunnica West Site A to screen views until the establishment of the proposed planting.</p>
<p>The Applicant should provide further details as to how additional job and training opportunities could be provided through the Scheme.</p>	<p>The creation of jobs has been assessed within the operational employment section of the Chapter 12 of the Environmental Statement [EN010106/APP/6.1]. Further information regarding the provision of training opportunities is provided within the outlined in the Outline Skills, Supply Chain and Employment Plan [EN010106/APP/7.8].</p> <p>The provision of additional local services including the provision of educational and/or visitor facilities was not included within the proposed scope of the Socio-economics and Land Use assessment. The Scoping Opinion received did not request such an assessment be added. The Scheme does not include the provision of educational and/or visitor facilities; however it is possible that training and educational activities will form part of the Skills, Supply Chain and Employment Strategy which will be developed for the Scheme in due course. Please refer to the Outline Skills, Supply Chain and Employment Plan submitted as part of the DCO application</p>

Matter raised	Regard had to comment by the Applicant
<p>Concern at the potential loss of farming jobs and the potential for few local long-term job opportunities.</p>	<p>The Applicant has assessed the impact of the Scheme on employment locally. It is estimated that construction will generate 1,685 net additional jobs per annum, of which 1,483 will be within 45 minutes travel time, and operation will generate 29 net additional jobs, of which 27 will be within 45 minutes travel time. See Chapter 12 of the Environmental Statement [EN010106/APP/6.1] for further detail.</p> <p>A requirement to Schedule 2 of the DCO will secure the implementation of a Skills and Employment Management Plan to help identify opportunities for businesses to access employment and supply chain opportunities associated with the construction, operation and maintenance of the Scheme.</p>

Planning

6.2.84 Consultees that provided substantive comments relating to planning included:

- | | |
|-------------------------------|--|
| a. Freckenham Parish Council; | f. Suffolk County Council; |
| b. Fordham Parish Council; | g. Cambridgeshire County Council; |
| c. Snailwell Parish Council; | h. West Suffolk Council; and, |
| d. Worlington Parish Council; | i. East Cambridgeshire District Council. |
| e. Chippenham Parish Council; | |

6.2.85 The matters most commonly raised by the above consultees included:

- The Applicant needs to present more information on how alternative sites have been considered;
- The proposed Scheme contravenes policy ENV6 of the East Cambridgeshire Local Plan, and,
- The proposed Scheme has not given sufficient enough weight to environmental impact.

6.2.86 The Applicant has had regard to all comments relating to economy in **Appendix J-1** and **Appendix J-2**. With regard to the matters raised in 6.2.84 above, the Applicant has set out its approach in **Table 6-23** below.

Table 6-23 Regard had to planning comments received from Section 42(1)(a) and (b) consultation

Matter raised	Regard had to comment by the Applicant
<p>The Applicant needs to present more information on how alternative sites have been considered.</p>	<p>The Applicant has considered alternative sites, including brownfield sites. Further information can be found in Appendix 4A Alternatives Assessment [EN010106/APP/6.2] submitted as part of the Applicant's DCO application. This analysis demonstrates that the site location is appropriate.</p> <p>The Applicant has considered the policies of the NPPF and other relevant national and local planning policies in preparing this DCO application. The Applicant's assessment of the Scheme against relevant planning policy (including local policy) is provided in the Planning Statement [EN010106/APP/7.2]. The planning balance presented in the Planning Statement considers the environmental impact of the Scheme against the benefits of the Scheme.</p>
<p>The proposed Scheme contravenes policy ENV6 of the East Cambridgeshire Local Plan</p>	<p>The Applicant has considered the policies of East Cambridgeshire Local Plan 2015 in preparing its DCO application. The Applicant's assessment of the Scheme against relevant planning policy is provided in the Planning Statement [EN010106/APP/7.2].</p> <p>The Applicant has carried out a full EIA which is summarised in the Environmental Statement [EN010106/APP/6.1] and the associated figures [EN010106/APP/6.3] and appendices [EN010106/APP/6.2]. The significant adverse effects of the Scheme identified by this assessment have been mitigated where possible.</p> <p>The Scheme meets the established urgent</p>

Matter raised	Regard had to comment by the Applicant
	<p>need for nationally significant renewable energy infrastructure set out in national policy by providing large amounts of low carbon energy quickly. Overall, with appropriate mitigation implemented, the EIA identifies limited residual significant adverse effects of the Scheme during its 40-year operation when considered relative to the large-scale nature of the Scheme. These effects are therefore considered to be outweighed by the significant national benefits that the Scheme will provide by providing much needed large scale renewable energy generation. The Scheme is therefore considered to be in accordance with the relevant national and local policies relating to the need for and provision of renewable energy infrastructure, including East Cambridgeshire's Local Plan 2015 Policy ENV 6. The planning balance presented in the Planning Statement [EN010106/APP/7.2] considers the environmental impact of the Scheme against the benefits of the Scheme.</p>
<p>The proposed Scheme has not given sufficient weight to environmental impact.</p>	<p>The Applicant has given significant weight to environmental impact and has carried out a full environmental impact assessment. This is summarised in the Environmental Statement [EN010106/APP/6.1] and the associated figures [EN010106/APP/6.3] and Appendices [EN010106/APP/6.2]. The significant adverse effects of the Scheme identified by this assessment have been mitigated where possible through changes to the Scheme design.</p>

Noise and Vibration

6.2.87 Consultees that provided substantive comments relating to noise and vibration included:

- a. Suffolk County Council;
- b. Cambridgeshire County Council;
- c. West Suffolk Council;
- d. East Cambridgeshire District Council;
- e. Freckenham Parish Council;
- f. Snailwell Parish Council;
- g. Isleham Parish Council;
- h. Worlington Parish Council; and,
- i. Public Health England.

6.2.88 The matters most commonly raised by the above consultees included:

- a. There is a need for an operational noise assessment;
- b. The BESS and substation infrastructure could cause noise disturbance locally;
- c. Mitigation will be required for the noise generated during construction;
- d. Concern at the potential noise impacts for users of PRow;
- e. Concern for the noise impact on wildlife, and,
- f. There will be a noise impact at the Burwell Substation.

6.2.89 The Applicant has had regard to all comments relating to economy in **Appendix J-1** and **Appendix J-2**. With regard to the matters raised in 6.2.87 above, the Applicant has set out its approach in **Table 6-24** below.

Table 6-24 Regard had to noise and vibration comments received from Section 42(1)(a) and (b) consultation

Matter raised	Regard had to comment by the Applicant
There is a need for an operational noise assessment.	The Applicant has conducted a noise assessment to assess the Scheme's noise impact during both construction and operations. Where appropriate, the Applicant has proposed mitigation to limit the Scheme's noise impact. The results of these assessments and the mitigation proposed are set out in Chapter 11 of the Environmental Statement [EN010106/APP/6.1]. These are set out in the Framework Operation Environmental Management Plan submitted as part of the Applicant's DCO application can be found in Appendix 16C of the Environmental Statement [EN010106/APP/6.2]. This will be updated subject to the Applicant receiving development consent and following the final design of the proposed Sunnica Energy Farm.
The BESS and substation infrastructure could cause noise disturbance locally.	The Applicant has conducted a noise assessment to assess the Scheme's noise impact during both construction and operations based on the application design. Where appropriate, the Applicant has proposed mitigation

Matter raised	Regard had to comment by the Applicant
	<p>to limit the Scheme's noise impact. The results of these assessments and the mitigation proposed are set out in Chapter 11 of the Environmental Statement [EN010106/APP/6.1] and will be secured pursuant to the Operational Environmental Management Plan to be agreed with the relevant local authority. A Framework Operational Environmental Management Plan has been submitted with the DCO application as Appendix 16F of the ES [EN010106/APP/6.2].</p> <p>With regards to the design of the Battery Energy Storage System (BESS), no significant effects have been identified and no mitigation measures beyond the embedded design have been proposed.</p>
Mitigation will be required for the noise generated during construction.	<p>The Applicant has conducted a noise assessment to assess the Scheme's noise impact during both construction and operations based on the application design. Where appropriate, the Applicant has proposed mitigation to limit the Scheme's noise impact. The results of these assessments and the mitigation proposed are set out in Chapter 11 of the Environmental Statement [EN010106/APP/6.1]</p> <p>Following the statutory consultation, the Applicant has conducted further assessment activity and further developed its Scheme proposals including further refinements to Appendix 16C Framework CEMP of the Environmental Statement [EN010106/APP/6.2]. This sets out how the Applicant is proposing to mitigate the environmental impacts of its construction activity, including to ecological receptors.</p>
Concern at the potential noise impacts	The Applicant has conducted a noise assessment to assess the Scheme's

Matter raised	Regard had to comment by the Applicant
for users of PRow.	<p>noise impact during both construction and operations. Where appropriate, the Applicant has proposed mitigation to limit the Scheme's noise impact. The results of these assessments and the mitigation proposed are set out in Chapter 11 of the Environmental Statement [EN010106/APP/6.1].</p> <p>Due to the transient nature of PRow users they will not be subject to long-term noise exposure. Any noise experienced by PRow users will be limited to when they are in proximity to the Scheme; when they are sufficiently far from the Scheme they would not be affected by noise from construction, operation or decommissioning phases.</p> <p>The Applicant recognises the importance of incorporating features within the Scheme design to minimise disturbance to those living, working and visiting the area. Inverters, switchgear and other equipment will be located away from PRow as shown by the parameters on the Works Plan [EN010106/APP/2.2] and as illustrated by the Parameter Plans (figures 3-1 and 3-2 of the ES [EN010106/APP/6.3]).</p>
Concern for the noise impact on wildlife.	<p>Following the statutory consultation, the Applicant has conducted further assessment activity and further developed its Scheme proposals including further refinements to Appendix 16C Framework CEMP of the Environmental Statement [EN010106/APP/6.2]. This sets out how the Applicant is proposing to mitigate the environmental impacts of its construction activity, including to ecological receptors.</p> <p>The results of the Applicants assessments on the Scheme's impact on ecological receptors is included in</p>

Matter raised	Regard had to comment by the Applicant
	Chapter 8 of the Environmental Statement [EN010106/APP/6.1]. The assessment has taken the impact of nesting seasons into account, concludes that there will be no significant effects on ecology and nature conservation.
There will be a noise impact at the Burwell Substation.	The Applicant has conducted a noise assessment to assess the Scheme's noise impact during both construction and operations. Where appropriate, the Applicant has proposed mitigation to limit the Scheme's noise impact. The results of these assessments and the mitigation proposed are set out in Chapter 11 of the Environmental Statement [EN010106/APP/6.1].

Other

6.2.90 Other matters raised by consultees who were consulted under section 42(1)(a) and (b) of the PA 2008 included:

- Concern at the financial status of the Applicant;
- There is public opposition to the Scheme, and
- The Scheme could affect local property values.

6.2.91 The Applicant has had regard to all miscellaneous comments in **Appendix J-1** and **Appendix J-2**. With regard to the matters raised in 6.2.90 above, the Applicant has set out its approach in **Table 6-25** below.

Table 6-25 Regard had to miscellaneous comments received from Section 42(1)(a) and (b) consultation

Matter raised	Regard had to comment by the Applicant
Concern at the financial status of the Applicant.	The Applicant and its constituent companies and consultants have an established tracked record of delivering projects of this kind. The Applicant's means of meeting liabilities incurred are set out in the Funding Statement [EN010106/APP/4.2].
There is public opposition to the	The Applicant accepts that not everyone

Matter raised	Regard had to comment by the Applicant
Scheme	is supportive of the Application. The Applicant is bringing forward the Application to answer a need for new sources of energy generation and has provided further details for this in the Statement of Need [EN010106/APP/7.1].
The Scheme could affect local property values.	<p>It is not the Applicant's experience that solar development impacts negatively upon the value of properties.</p> <p>The Applicant is not proposing to offer compensation for any change in property values.</p>

6.3 Section 47 (s47) consultation and non-prescribed consultees

Overview

6.3.1 This section sets out responses received to section 47 consultation - that is, from local people living in the vicinity of the Scheme. It includes an analysis of responses received as well as details of issues raised by theme and the regard had to them by the Applicant. This section additionally sets out responses received to section 47 consultation from non-prescribed consultees.

6.3.2 The Applicant has included non-prescribed consultees in this section as these were contacted through a commitment in the SoCC and were not consulted in the same manner as consultees pursuant to s42(1)(a), s42(1)(b), s42(1)(d) and s44. The non-prescribed consultees that provided responses are set out in 6.3.24.

Response collection

6.3.3 The Applicant solicited responses to consultation under s47 of the PA 2008 primarily through the consultation questionnaire and also accepted written responses submitted as letters and emails.

6.3.4 Responses were collected primarily via online and hard copy consultation feedback questionnaires. Written responses and emails received to the Applicant's communication channels were also collected.

6.3.5 Hard copy consultation questionnaires were collected via a Freepost address. Electronic questionnaires were received via SurveyMonkey which was accessible by a link on the consultation website.

6.3.6 Through the consultation questionnaire, the Applicant asked for comments on a range of topics, regarding the location of the proposed sites and cable routes, as well as the environmental impact across different stages of the Scheme's proposed lifetime. The consultation questionnaire also included tick-box demographic monitoring questions and provision to supply contact details. The full list of questions asked in the consultation questionnaire are set out in **Table 6-29**.

6.3.7 All seven questions asked in the consultation questionnaire were open-ended and provided free-form spaces for consultees to provide detailed responses to the questions. All individual feedback responses received and how the Applicant has had regard to these responses are included in **Appendix J-3**.

6.3.8 In total, 725 responses were received to the s47 consultation between 22 September and 18 December 2020. 705 community responses were received to the s47 consultation - that is, from local people living in the vicinity of the Scheme. The Applicant additionally received 20 responses from non-prescribed bodies that it consulted under s47. The responses from these bodies are analysed in this section. A summary of the results is presented below. For each question, the Applicant has coded responses into frequency tables shown in **Tables 6-30 to 6-35** below.

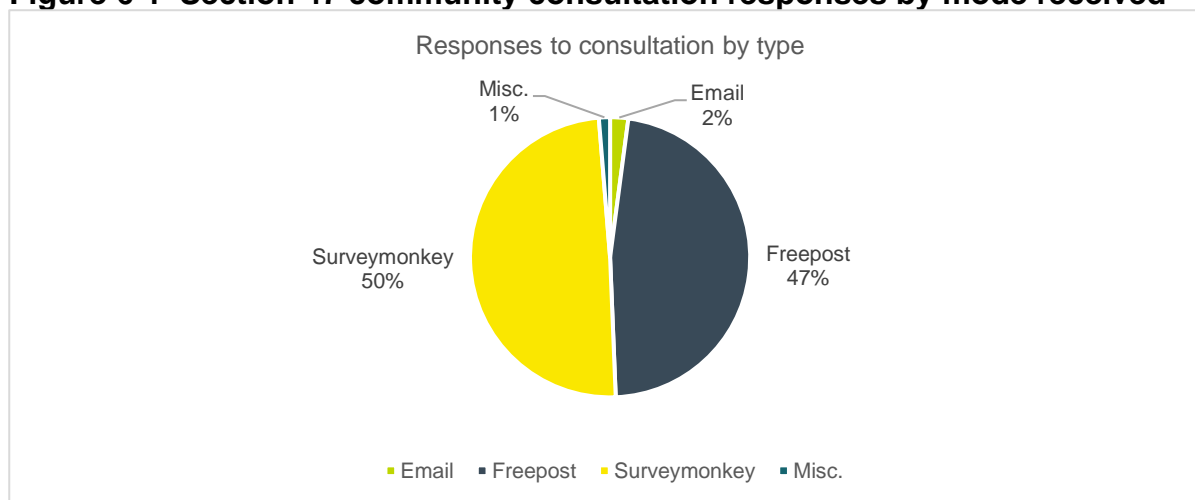
Source of community responses

6.3.9 During the Section 47 consultation period, the Applicant received:

- a. 626 completed feedback forms; and
- b. 79 pieces of feedback via email or as letters

6.3.10 The majority of responses were sent via the online and hard copy feedback questionnaires, accounting for 85.9% of total responses. **Figure 6-1** shows the responses by mode received (responses recorded as “sent to PINS” refers to responses sent to PINS which they then forwarded to the Applicant).

Figure 6-1 Section 47 community consultation responses by mode received



6.3.11 In summary:

- a. 94% of respondents who provided their address lived within Zone 1 of the consultation zone, and Isleham, closest to Sunnica East Site A, was the most common location for addresses provided (26%);
- b. 75% of the postcodes provided by respondents were from two postcode areas within Zone 1 of the Consultation Zone, CB7 5 and IP28 8;
- c. Of the 523 respondents who provided their age range on the feedback form, 45% of these were over the age of 60. 7% of the total respondents were over 79; and,
- d. Overall, community consultees had detailed knowledge and comments on the Scheme. The average length of responses was 665 words.
- e. **Figure 6-3** and **Table 6-26** show the reach of the consultation in terms of employment demographic. People identifying themselves as working full time or as retired accounted for a majority of those who chose to provide this information in their response.

Table 6-26 Community consultation responses received by address provided

Location	Number of responses
Isleham	90
Worlington	45
Red Lodge	36
Freckenham	32
Burwell	28
Chippenham	24
Fordham	23
Snailwell	13
Barton Mills	10
West Row	9
Badlingham	3
Newmarket	5
Kennett	4
Reach	4
Mildenhall	4
Soham	2
Exning	2
Misc. (Kentford, Epping, Hardwicke, Altrincham, London, Littleport, Higham)	1

Figure 6-2 Community responses received by postcode provided

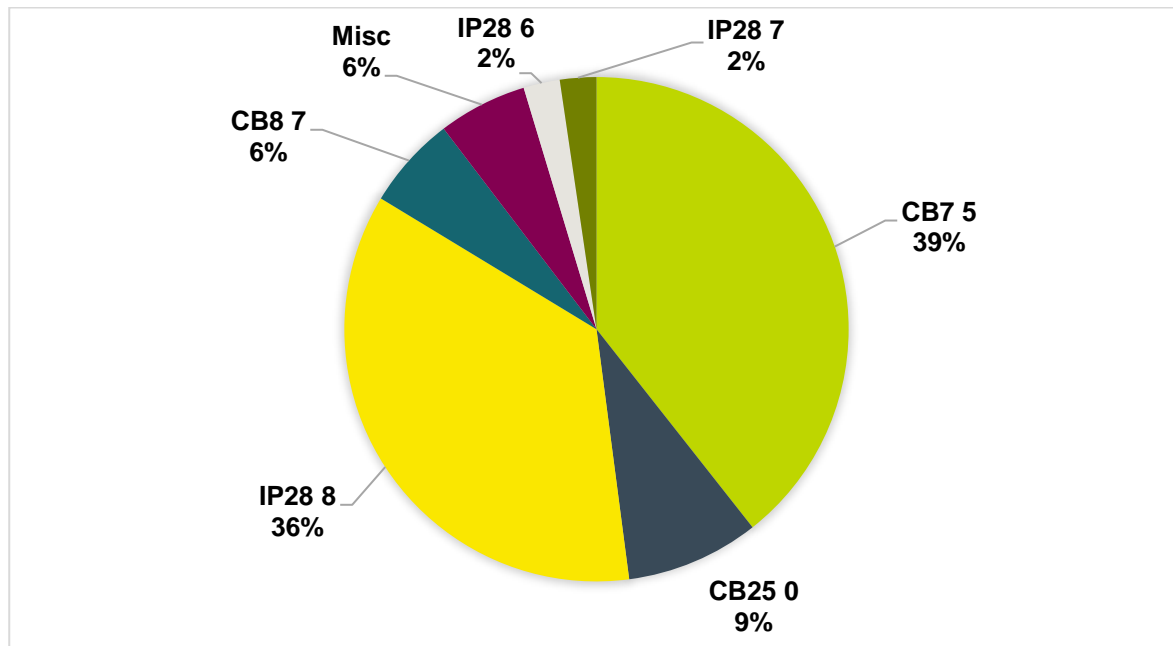


Figure 6-3 Community feedback by occupation of respondent

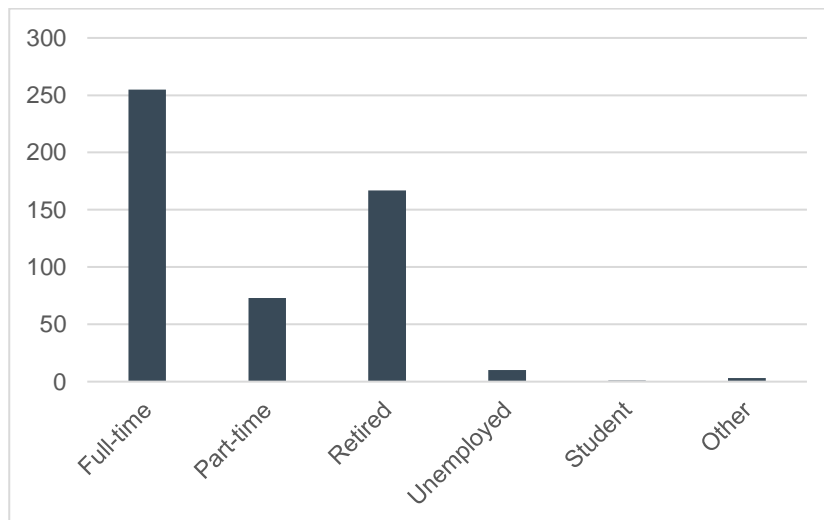


Table 6-27 Community feedback by occupation of respondent

Occupation	Incidence
Full-time	255
Part-time	73
Retired	167
Unemployed	10

Student	1
Other (not specified)	3

Figure 6-4 Community feedback by age of respondent

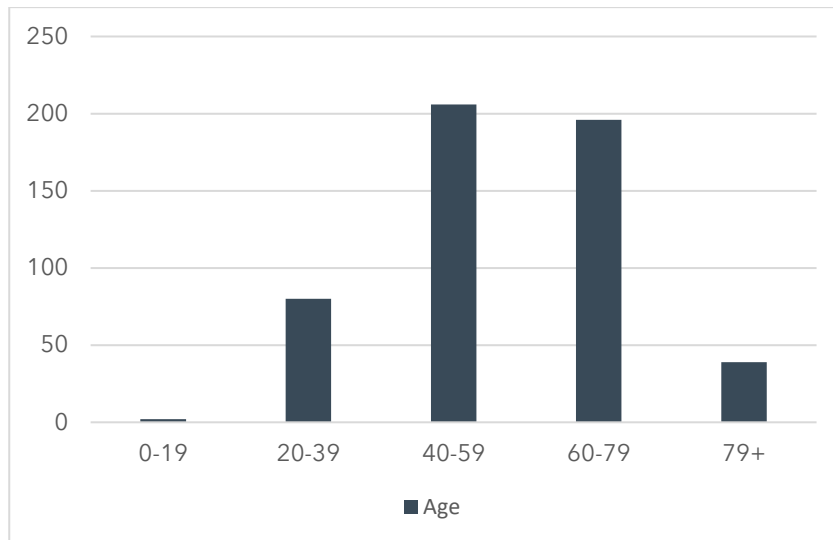


Table 6-28 Community feedback by age of respondent

Age	Incidence
0-19	2
20-39	80
40-59	206
60-79	196
79+	39

Analysis of responses

6.3.12 Respondents could answer any number of questions included in the feedback form.

6.3.13 Out of the 626 completed feedback questionnaires received, **Table 6-29** outlines how many responses were received for each question.

6.3.14 Many respondents used the questionnaire to provide general comments on the Scheme overall, either using the first or last questions to give their responses.

Table 6-29 Number of responses received to questions within the feedback questionnaire

Question on feedback form	Number of responses received
Question 1a) Do you have any comments on our proposals for Sunnica East Sites A and B?	555
Question 1b) Do you have any comments on our proposals for Sunnica West Sites A and B?	377
Question 2) Do you have any comments on our proposals for connecting to the national electricity transmission system, including laying cables underground and extending Burwell National Grid substation?	430
Question 3a) Do you have any comments about the potential environmental impacts and our proposed mitigation during the construction of Sunnica Energy Farm?	483
Question 3b) Do you have any comments about the potential environmental impacts and our proposed mitigation during the operational lifetime of Sunnica Energy Farm?	425
Question 3c) Do you have any comments about the potential environmental impacts and our proposed mitigation during the decommissioning of Sunnica Energy Farm?	405
Question 4a) Do you have any further comments?	549

6.3.15 This section offers a breakdown of the responses received to each questionnaire by the frequency with which each theme was raised. A more detailed, qualitative, analysis of issues raised and the regard had to them by the Applicant is provided in 6.3.25 to 6.3.167.

Question 1a) Do you have any comments on our proposals for Sunnica East Sites A and B?

6.3.16 This was the most answered question through the feedback form, with 88.6% of respondents providing an answer to this question. Generally, most answers referred to the Scheme as a whole, and the two most common points raised were that the Scheme was too large and concern that there would be a loss of viable agricultural land.

Table 6-30 Breakdown of most common responses to Question 1a

Theme	Incidence
It is too large	182
Concerned about the loss of viable agricultural/farming land	167
No/No Comment	71

Theme	Incidence
The site is too close to residential areas	61
General statement of disagreement	31
House prices will go down as a result of the Scheme	30
It will ruin local landscapes	30
It will devastate the local wildlife	29
There is a fire risk from the batteries	23
There will be no benefit for the local community	22
It will damage wildlife habitats	22
Against the visual impact of solar panels	19
It will spoil the countryside	19
Battery storage technology is dangerous	18
Generally supportive of the need for solar farms	18
There will be noise pollution	18
There will be an increase of heavy transport on rural roads	17
We need to grow our own food now we are leaving the EU	15
There will be a general environmental impact	15
Too close to Worlington	15
The scheme boundary was changed to be closer to Isleham with no consultation	14
Too close to Isleham	14
The screening will take too long	13
Lack of consideration of alternative locations such as brownfield or rooftops	12
It will impact the local residents	12
I have health and safety concerns	12
The batteries are too close to primary schools	11
The construction will be disruptive to the local community	11
It is too industrial	10

Theme	Incidence
The batteries will produce toxic fumes if they catch fire	10
We have plenty of solar farms in the area	10
There will be increased traffic	10

Question 1b) Do you have any comments on our proposals for Sunnica West Sites A and B?

6.3.17 The lower response rate to this question (60.2%) can be attributed to the fact that one-third of non-responses given referred to the answer they gave for question 1a, indicating they had the same comments for both sites.

Table 6-31 Breakdown of most common responses to Question 1b

Theme	Incidence
No/No Comment	171
It is too large	98
Concerned about the loss of viable agricultural/farming land	74
The site is too close to residential areas	33
General statement of disagreement	31
There will be a detrimental effect to the landscape	11
Dislike the visual impact of solar panels	11
There will be damage to wildlife habitats	11
Brownfield sites should be used instead	11
General supportive statement	11

Question 2) Do you have any comments on our proposals for connecting to the national electricity transmission system, including laying cables underground and extending Burwell National Grid Substation?

6.3.18 This question was answered by 67.7% of respondents, with most respondents choosing to comment on the cable route, design, and perceived disruption during construction.

Table 6-32 Breakdown of most common responses to Question 2

Theme	Incidence
No/No Comment	173
There will be traffic disruption	40

It will cause a disruption to people's lifestyles	29
General statement of disagreement	23
There will be a general environmental impact	18
Concerned about the loss of wildlife	16
Concerned about the loss of agricultural land	15
The scheme is too large	12
There is no benefit for residents	11
There will be disruption to the area	11
Why is this being done so far from Burwell substation?	7

Question 3a) Do you have any comments about the potential environmental impacts and our proposed mitigation during the construction of Sunnica Energy Farm?

6.3.19 Of the three questions asking about environmental impacts at different stages of the Scheme's lifetime, community consultees were most concerned with the construction stage, with 77% of respondents providing an answer to this question. Traffic impacts were also a prevalent concern recorded in the answers to this question.

Table 6-33 Breakdown of most common responses to Question 3a

Theme	Incidence
No/No Comment	132
There will be a loss of wildlife habitats	47
There will be an increase in heavy traffic during construction	46
Concerned about the loss of viable agricultural and farming land	43
The noise of construction will be unacceptable	41
Narrow roads in the area cannot cope with an increase in heavy traffic	37
The scheme will be destructive to the environment	23
There will be a loss of wildlife	20
There will be traffic chaos through the villages	19
The site is too large	19
There will be a disruption to traffic and everyday life	18
General statement of disagreement	17
The Scheme will increase pollution in the area	14

Theme	Incidence
The mitigation is insufficient and has not been properly addressed	13
There will be chaos in the community	12
Property values will fall as a result of the Scheme	11
The scheme will have a negative impact on wildlife	10
The scheme will be noisy once it is operational	10
There will be an increase in accidents as a result of increased heavy traffic	10
Against the visual impact of solar panels	9

Question 3b) Do you have any comments about the potential environmental impacts and our proposed mitigation during the operational lifetime of Sunnica Energy Farm?

6.3.20 67.8% of respondents provided an answer to this question. The most common answer was concern with the loss of agricultural land. Respondents generally made comments about the Scheme's proposed operational lifetime, as well as the visual impact of the Scheme.

Table 6-34 Breakdown of most common responses to Question 3b

Theme	Incidence
No/No Comment	181
Against the loss of viable agricultural/farming land	32
General statement of disagreement	21
The panels will not be functioning 40 years on from installation due to technological change	15
The proposed screening will take too long	15
The proposed Scheme lifetime of 40 years is too long	13
40 years is too short for the amount invested/to justify the impact of the scheme	12
Against the visual impact of the solar panels	9

Question 3c) Do you have any comments about the potential environmental impacts and our proposed mitigation during the decommissioning of Sunnica Energy Farm?

6.3.21 64.6% of respondents provided an answer to this question, with the most common answer requesting more information about the decommissioning process. Most responses to this question focussed on the cost of decommissioning, potential land uses after decommissioning, and disposal of materials.

Table 6-35 Breakdown of most common responses to Question 3c

Theme	Incidence
No/No Comment	189
More detailed information about decommissioning and the plan for it is needed	26
There have been no guarantees that Sunnica will return the land to farmland	22
The ground will be too contaminated and unable to be restored to farming	17
Don't build it and then it will not need to be decommissioned	14
General statement of disagreement	12
There is not an 100% guarantee that all recyclable parts will be recycled and not end up in landfill	12
How much of the infrastructure can be recycled?	10
Who will pay for the decommissioning?	10

Question 4) Do you have any further comments?

6.3.22 Respondents generally used this question to restate points made throughout the questionnaire or provide a full response to the Scheme as a whole. 87.6% of respondents provided a response to this question. The most common answers were consistent with the rest of the questionnaire, with the scale of the Scheme being too large and loss of agricultural land being the two most common themes raised. Many in this section also stated their support for renewable energy schemes. Comments on the consultation process, the Applicant, and community impacts were also recorded frequently in response to this question.

Table 6-36 Breakdown of most common responses to Question 4

Theme	Incidence
There will be a loss of viable agricultural/farming land	80
The Scheme is too large	76
No/No Comment	74
Supportive in principle of renewable energy but not the site	50
Deterioration of value to local houses	36
Use rooftop sites instead	35
Use brownfield sites instead	33
The scheme is too close to residential areas	24

Theme	Incidence
General statement of disagreement	24
There is no benefit for residents	24
The developers are only motivated by profit	20
Prefer wind turbines to solar	18
The developers should not use the COVID-19 pandemic as an excuse to stop consulting	17
We should have proper face-to-face meetings	17
It will be a blot on the landscape	16
The consultation process has been inadequate	13
The residents enjoy the rural aspects of the local area and this will be ruined by the proposals	13
There are already solar farms in the area so the scheme is not needed	13
The BESS units are a known fire risk	12
The country is in need of renewable energy infrastructure	12
Battery storage is not safe	10
The site will ruin the countryside	10
General statement of support of the scheme	10

Letter responses

6.3.23 79 responses were received that did not follow the questionnaire format. These were received as letters via freepost or through email. The themes raised in these submissions follow the responses recorded in the questionnaire feedback, with loss of agricultural land and the scale of the Scheme the most common themes raised.

Table 6-37 Breakdown of most common responses from feedback not following questionnaire format

Theme	Incidence
Concerned about the loss of agricultural land for food production	37
The scale is too big	22
Support for green energy in principle, but not this development	24
Solar farms should be built on brownfield sites	15
The pandemic is being used to not directly engage with the public	14

Theme	Incidence
Solar should be placed on rooftops instead	13
There is no local benefit	12
The screening will take too long to grow	11
We need to reduce carbon miles for food	11
It will destroy nesting and feeding habitats	11
The scheme will destroy wildlife corridors	10
Decrease in the value of homes	10
We will need farmland once we have left the EU	9

6.3.24 The Applicant received substantive comments from the following groups identified as non-prescribed consultees:

- a) Bedfordshire, Cambridgeshire and Northamptonshire Wildlife Trust (BCN Wildlife Trust);
- b) British Horse Society;
- c) Campaign to Protect Rural England (CPRE);
- d) Dalham Parish Council;
- e) Gardens Trust;
- f) Herringswell Parish Council;
- g) Lucy Frazer MP;
- h) Matt Hancock MP;
- i) Cambridgeshire and Peterborough Combined Authority;
- j) Mildenhall High Town Council;
- k) Moulton Parish Council;
- l) Newmarket Town Council;
- m) Newmarket Horsemen's Group;
- n) Reach Parish Council;
- o) RSPB;
- p) Stansfield Parish Council;
- q) Suffolk Chamber of Commerce;
- r) Suffolk Preservation Society;
- s) Suffolk Ramblers; and,
- t) Suffolk Wildlife Trust.

Summary of issues raised and regard had to them by the Applicant

6.3.25 This section provides a further analysis of the themes raised across the feedback forms, as well as incorporating the written responses received that did not follow the format of the questionnaires.

6.3.26 This section will discuss the feedback received based around high-level themes which were most raised in responses:

- | | |
|--------------------|----------------------------------|
| a. Site selection; | i. Decommissioning; |
| b. Land Use; | j. Ecology; |
| c. Need; | k. Landscape and Visual Amenity; |
| d. Design; | l. Heritage Assets; |
| e. Cable Route; | m. Transport and Access; |
| f. EIA Process; | n. Water Resources; |
| g. Construction; | o. Human Health; |
| h. Operations; | |

- p. Renewable Energy;
- q. Climate Change; and,
- r. Other

Site selection

6.3.27 Key themes that were raised by community consultees included:

- a. The Scheme is too close to villages;
- b. The Scheme is too close to residential properties;
- c. The Battery Energy Storage Systems are too close to residential areas;
- d. The location of the Scheme is inappropriate as it is on greenfield land;
- e. The Applicant has not considered alternative sites more suited to solar generation such as non-populated areas and brownfield sites;
- f. The Scheme should be located closer to the grid connection point at Burwell;
- g. There should be consideration of alternative scales of solar development, such as on rooftops;
- h. The Applicant needs to provide evidence of the site selection process;
- i. There will be a negative impact on residents;
- j. The location could impact on the Newmarket horse racing industry;
- k. The Scheme will change the nature of the area from rural to industrial;
- l. Property prices in the area will fall as a direct impact of the Scheme; and,
- m. West Site B is preferred due to its partial location alongside existing infrastructure.

6.3.28 A total of 99 comments objected to the Scheme location, stating that the location was inappropriate. Community consultees also expressed the view that the location was not suitable due to its location on greenfield land. Nine responses felt that the location of the Scheme was appropriate. Three respondents expressed a preference for West Site A, one for the West sites overall, and one for East Site B.

6.3.29 Most comments which directly offered comments on East Sites A and B did so in relation to the closeness of these sites to villages, particularly Isleham and Worlington. Parcels E24, E25, E26, E27, and E28 (shown in page 9 of the consultation booklet, available in **Appendix G-4**), were felt to encroach on village access routes.

6.3.30 Community responses which offered comments on West Sites A and B expressed a preference for the B site due to its smaller scale in relation to the other sites and proximity to the A11.

6.3.31 Respondents commenting on the locations of the Battery Energy Storage Systems felt the units were too close to residential areas, with particular reference to schools. This was mostly discussed in terms of the impact on human health in the event of a fire or explosion and was raised 69 times. This was raised by Herringswell Parish Council. The visual impact of the units was also raised as a reason for siting the BESS further from residential areas.

Proximity to villages

6.3.32 A high proportion of comments which discussed the Scheme's location raised the perceived proximity to villages. This theme was raised 280 times generally and principally identified Worlington (34 times) and Isleham (23 times) as villages most impacted by the Scheme. Comments on the Scheme's proximity to both villages were mostly expressed in Question 1a, which asked for comments on the East A and B sites. It was felt that the character of the area was connected to the historic relationship between the villages and this would be altered by the Scheme.

6.3.33 Eleven comments were received which stated that Chippenham was also too close to the Scheme boundary. These comments were mostly collected in response to Question 1b, which asked for comments on the West A and B sites. One respondent felt that West Site B in particular was too close to the village. Eight comments were received which stated that Freckenham was too close to the Scheme boundary. These were mostly in response to Question 1a, which asked for comments on the East A and B sites.

6.3.34 In addition, there was some discussion about the impact of the Scheme's location on the proposed Kennett Garden Village. This was raised ten times by community consultees, in the context of reducing the impact of the Scheme visually and ensuring noise impacts are reduced. This was mostly raised in response to Question 1b, regarding West Sites A and B. Specific reference was made to parcels W15 and W16 (shown in page 11 of the consultation booklet, Appendix G-4) that would adjoin the area.

6.3.35 In addition, community consultees felt that the proposed Scheme was unfair to residents living near the Scheme that had chosen to live in the area due to the rural setting. This was raised a total of 64 times across the feedback received. More broadly, comments which stated that there would be a negative impact on residents were recorded 109 times.

6.3.36 The Suffolk Preservation Society felt the proximity of the Scheme to villages would have a material harm on residential amenity. Similarly, CPRE felt that it would have an adverse impact on the residential amenity of Kennett, Snailwell, Chippenham, Fordham and Burwell. Matt Hancock MP and Lucy Frazer MP's joint response also raised potential harm due to the proximity of the scheme to residents' homes.

6.3.37 Those living in close proximity to the Scheme were concerned that the Scheme would result in a reduction to property values in the area. This was raised 107 times by community consultees.

6.3.38 Community consultees also raised the potential impact of the Scheme in relation to Newmarket's horse racing industry. This was raised 14 times by the community. The impact was also raised by the Newmarket Horsemen's Group. The Newmarket and District Ramblers felt that the amount of stud farms and training facilities had resulted in a loss of land in the area already.

Alternative Sites

6.3.39 Community consultees were keen to share alternative sites for the Scheme. The most common suggestion was building on brownfield sites (suggested 104 times), rooftops of industrial buildings (90 times), and on rooftops of new-build housing (18 times).

6.3.40 Alternative locations were also suggested: most frequently a site closer to the Burwell National Grid Substation, which was raised 35 times, as well as alongside existing

infrastructure such as major roads, such as the A11 and the A14, or railway lines. Other remote locations were suggested, such as the Fens, and non-populated areas.

6.3.41 Other comments questioned the site selection process and requested access to the options appraisal. The feeling that alternative sites had not been considered was raised 47 times.

6.3.42 Various consultees raised the choice of greenfield land over other locations such as brownfield or rooftop sites. Both the BCN Wildlife Trust and CPRE expressed a preference for rooftop-based solar PV compared to ground mounted solar panels. The Suffolk Preservation Society objected to greenfield land being selected over brownfield sites.

6.3.43 The Newmarket Horsemen's Group and the Suffolk Preservation Society requested that the site selection process be made available to demonstrate the suitability of the site.

Applicant's Response

6.3.44 The Applicant has had regard to all comments relating to site selection in **Appendix J-3**. With regard to the matters raised at 6.3.27 above, the Applicant has set out its approach in **Table 6-38** below.

6.3.45 Where land parcels are given in reference to consultation feedback, these are referring to the parameter plans presented at the statutory consultation (pages 9 and 11 of the consultation booklet, available in **Appendix G-4**). The parameter plans have been updated following the statutory consultation and are presented as figures 3-1 and 3-2 of the ES [EN010106/APP/6.3]. The Applicant makes reference to these in its summary of design changes below.

6.3.46 The Applicant has revised the design of the proposed Sunnica Energy Farm following the statutory consultation. The areas where the solar PV panels and associated infrastructure can be located in Sunnica East Site A and B has been reduced. This will set the areas where the solar PV panels and associated infrastructure can be located back from Isleham and Worlington. Parcels E07, E11, and E23 are no longer proposed to be built on. Parcel E07 now forms ecological mitigation area ECO2. E11 and E23 form part of ecological mitigation area ECO3.

6.3.47 The BESS at E33 will be set further back from Ferry Lane.

6.3.48 Additional landscaping has been proposed at parcels W10, W11, and W15. Extensive treatments on the eastern boundary of W15 will help mitigate impact on Kennett Garden Village. The Applicant is no longer proposing to include W13, W14 and W16 (page 11 of the consultation booklet, available at **Appendix G-4**) within the Order limits.

Table 6-38 Regard had to comments relating to site selection received from Section 47 consultation

Matter raised	Regard had to comment by the Applicant
The Scheme is too close to villages	The Applicant has revised the design of the proposed Sunnica Energy Farm following the statutory consultation. The

Matter raised	Regard had to comment by the Applicant
	<p>areas where the solar PV panels and associated infrastructure can be located in Sunnica East Site A and B has been reduced. This will set the areas where the solar PV panels and associated infrastructure can be located back from Isleham and Worlington. Parcels E07, E11, and E23 are no longer proposed to be built on.</p> <p>In addition to this, Battery Energy Storage System (BESS) at E33 will be set further back from Ferry Lane. The areas where the solar PV panels and associated infrastructure can be located in Sunnica West Site A and Site B has also been reduced in size. This will set the project back from residential dwellings in the area. Large areas of W03 and W04 are not proposed for solar development and the areas where the solar PV panels and associated infrastructure can be located at W15 is being set back further from residential dwellings. Additional landscaping has been proposed at parcels W10, W11, and W15. Extensive treatments on the eastern boundary of W15 will help mitigate impact on Kennett Garden Village. Taken together, and with the design changes made by the Applicant following the non-statutory consultation, the Applicant considers that the visibility of the solar panels will be reduced by the distance from the villages, the intervening vegetation and the proposed planting. The layout of the Scheme, including the parcels referenced, is shown in figures 3-1 and 3-2 (parameter plans) of the ES [EN010106/APP/6.3].</p> <p>The Applicant notes that a number of comments relate to the parameter plans presented in the Preliminary Environmental Information Report (PEI Report) and therefore references these in its response.</p>
The Scheme is too close to residential	The Scheme has, where possible, aimed

Matter raised	Regard had to comment by the Applicant
properties	<p>to set back from residential dwellings and incorporate landscape mitigation and layout design measures to reduce the impact on residential dwellings.</p> <p>Chapter 4: Alternatives and Design Evolution of the ES [EN010106/APP/6.1] explains the reasons for why the land selected for the Scheme is suitable for large scale solar generation. This is supported by Appendix 4A Alternative Sites Assessment of the ES [EN010106/APP/6.2] which provides a detailed assessment and consideration of alternative sites for the Scheme with reference to planning and environmental constraints of the land and operational requirements of the Scheme including avoiding residential areas.</p>
The Battery Energy Storage Systems are too close to residential areas	<p>The Applicant recognises how important it is to ensure that the BESS is safe including with reference to acceptable distance to residential properties. The Applicant has embedded mitigation in relation to acceptable safe distances from residential properties within the Sunnica Energy Farm design and the Applicant has submitted an Outline Battery Fire Safety Management Plan [EN010106/APP/7.6] with the DCO. This outline plan sets out how the Scheme proposes to mitigate and manage the potential fire risk posed by the BESS. The batteries will be housed within containers. These containers may be modular and joined depending on equipment choice to be determined at detailed design stage. Each BESS container will be fitted within an automatic sprinkler or water mist system for fire suppression in the event of an unplanned fire. The water supply for this system will be integrated into the design of each BESS container and located either internally or externally (centralised or decentralised) to each BESS. The containment of this water would be within a sump integrated into the</p>

Matter raised	Regard had to comment by the Applicant
	<p>BESS container. Each BESS area requires water storage for use by fire fighters in case of a fire in the BESS compound. In addition, an Unplanned Atmospheric Emissions from Battery Energy Storage Systems (BESS) Assessment is included within Appendix 16D of the Environmental Statement [EN010106/APP/6.2]. The assessment has determined that even in the unlikely scenario that all the safety systems fail and a large scale fire breaks out within one of the BESS containers then the resultant hydrogen fluoride concentration at the closest receptors would be below the level that Public Health England has identified as resulting in notable discomfort to members of the general population.</p>
<p>The location of the Scheme is inappropriate as it is on greenfield land</p>	<p>Consideration has been given to the use of previously developed land as opposed to greenfield land when selecting the land for the Scheme. This is discussed in Appendix 4A Alternative Sites Assessment of the ES [EN010106/APP/6.2]. The assessment concludes that previously developed land of the size required by the Scheme has not been found within the search area for the Scheme.</p>
<p>The Applicant has not considered alternative sites more suited to solar generation such as non-populated areas and brownfield sites</p>	<p>Chapter 4: Alternatives and Design Evolution of the ES [EN010106/APP/6.1] explains the reasons for why the land selected for the Scheme is suitable for large scale solar generation. This is supported by Appendix 4A Alternative Sites Assessment of the ES [EN010106/APP/6.2] which provides a detailed assessment and consideration of alternative sites for the Scheme with reference to planning and environmental constraints of the land and operational requirements of the Scheme including avoiding residential areas. This assessment has concluded that previously developed land of the size required by the Scheme has not been found within the</p>

Matter raised	Regard had to comment by the Applicant
	search area for the Scheme.
The Scheme should be located closer to the grid connection point at Burwell	Appendix 4A Alternative Sites Assessment [EN010106/APP/6.2] of the ES includes the reasons for selecting the Burwell National Grid Substation and the area of search from this connection point. It also explains how suitable land within the area of search has been identified. The latter includes the process of excluding various planning and environmental constraints including best and most versatile agricultural land which is the characteristic of the land closer to Burwell National Grid Substation.
There should be consideration of alternative scales of solar development, such as on rooftops	The Applicant is of the view that the Scheme is not an alternative to a number of other, small, solar developments but will complement them in providing much needed new renewable energy to the national electricity grid. This is supported by the Overarching National Policy Statement (NPS) for Energy EN-1 (paragraph 3.3.25). The Applicant has provided a Statement of Need [EN010106/APP/7.1] as part of its DCO application setting out the need for the Scheme in the context of the need for renewable energy generation more widely. Within section 9.3 of the Statement of Need, the Applicant sets out the importance of scale in solar development. This is because it brings greater decarbonisation and economic benefits when compared to a number of smaller, independent schemes comprising an equivalent generating capacity.
The Applicant needs to provide evidence of the site selection process	Chapter 4: Alternatives and Design Evolution of the ES [EN010106/APP/6.1] explains the reasons for why the land selected for the Scheme is suitable for large scale solar generation. This is supported by Appendix 4A Alternative Sites Assessment of the ES

Matter raised	Regard had to comment by the Applicant
	<p>[EN010106/APP/6.2] which provides a detailed assessment and consideration of alternative sites for the Scheme with reference to planning and environmental constraints of the land and operational requirements of the Scheme. This analysis demonstrates that the Sites location are suitable.</p>
<p>There will be a negative impact on residents</p>	<p>The Applicant has revised the design of the proposed Sunnica Energy Farm following the statutory consultation. The areas where the solar PV panels and associated infrastructure can be located in Sunnica East Site A and B has been reduced This will set the areas where the solar PV panels and associated infrastructure can be located s back from Isleham and Worlington. Parcels E07, E11, and E23 are no longer proposed to be built on. In addition to this, Battery Energy Storage System (BESS) at E33 will be set further back from Ferry Lane. The areas where the solar PV panels and associated infrastructure can be located in Sunnica West Site A and Site B has also been reduced in size. This will set the project back from residential dwellings in the area. W13, W14 and W16 have been removed from the Scheme, and large areas of W03 and W04 are not proposed for solar development. Additional landscaping has been proposed at parcels W10, W11, and W15. Extensive treatments on the eastern boundary of W15 will help mitigate impact on Kennett Garden Village. Taken together, and with the design changes made by the Applicant following the non-statutory consultation, the Applicant considers that the visibility of the solar panels will be reduced by the distance from the villages, the intervening vegetation and the proposed planting. The layout of the Scheme, including the parcels referenced, is shown in figures 3-1 and 3-2 (parameter plans) of the ES [EN010106/APP/6.3]. The Applicant notes</p>

Matter raised	Regard had to comment by the Applicant
	<p>that a number of comments relate to the parameter plans presented in the Preliminary Environmental Information Report (PEI Report) and therefore references these in its response.</p>
<p>The location could impact on the Newmarket horse racing industry</p>	<p>The Applicant has had regard to the Newmarket Conservation Area and the cultural heritage of the horseracing industry. It is considered that the Sunnica Energy Farm will have no impact on these assets. This includes assessments relating to a number of impacts set out below. The full results of the Applicant's assessments carried out in relation to heritage can be found in Chapter 7: Cultural Heritage of the Environmental Statement [EN010106/APP/6.1] submitted as part of the Applicant's DCO application. The Applicant has assessed the impacts of the proposed Sunnica Energy Farm including in terms of landscape and visual impact assessment. Further details can be found in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [EN010106/APP/6.1]. Further details including an overview of the potential impacts on the horse racing industry can be found within the Planning Statement [EN010106/APP/7.2].</p>
<p>The Scheme will change the nature of the area from rural to industrial</p>	<p>The Scheme has been designed to minimise the effect it will have on the countryside. The Scheme has sought to avoid ecological features and sites designated for nature conservation. Chapter 8: Ecology and Nature Conservation of the Environmental Statement [EN010106/APP/6.1] has assessed the impacts on ecology receptors and conclude there will be no significant effects on ecology and nature conservation.</p> <p>In addition, Chapter 10: Landscape and Visual Amenity of the Environmental Statement [EN010106/APP/6.1] has</p>

Matter raised	Regard had to comment by the Applicant
	assessed the impact of the Scheme on landscape and visual receptors and sought to reduce the potential effects of the Scheme through embedded mitigation which has been built into the Scheme design. With mitigation measures in place, the Applicant respectfully disagrees with the contention that the Scheme will industrialise the landscape.
Property prices in the area will fall as a direct impact of the Scheme	It is the Applicant's experience that across the United Kingdom solar PV has been shown not to negatively affect the value of property or businesses nearby.
West Site B is preferred due to its partial location alongside existing infrastructure	Chapter 4: Alternatives and Design Evolution of the ES [EN010106/APP/6.1] explains the reasons for why the land selected for the Scheme is suitable for large scale solar generation. This is supported by Appendix 4A Alternative Sites Assessment of the ES [EN010106/APP/6.2] which provides a detailed assessment and consideration of alternative sites for the Scheme with reference to planning and environmental constraints of the land and operational requirements of the Scheme.

Land use

6.3.49 The loss of agricultural land was the most common theme raised throughout responses under s47. This was often linked with the size of the Scheme, with the scale and type of land used appearing as a joint concern.

6.3.50 Key themes that were raised by community consultees included:

- Concern at the loss of agricultural producing land in the area;
- Questioning whether the impact of losing agricultural production has been factored into the cost-benefit analysis of the Scheme;
- Agricultural land might become more important throughout the Scheme's lifetime;
- Food production is central to the local economy and local supply chains and jobs will be affected;

- e. Concern at the potential damage to the quality of the agricultural land during the Scheme's operating life;
- f. The Agricultural Land Classification is outdated and not accurate;
- g. Existing public rights of way (PRoW) should not be closed during the construction and decommissioning phases of the Scheme; and,
- h. Opportunities to upgrade existing PRoWs and create new PRoWs should be incorporated.

6.3.51 The most popular comment raised by community consultees overall was that the Scheme would lead to the loss of viable agricultural land. This theme was raised 464 times.

6.3.52 Comments categorised as relating to the theme of losing agricultural land within the Scheme were raised 339 times. Several impacts were raised, most commonly the increased carbon footprint of importing food. The issue was also raised in the context of issues such as leaving the EU, population growth, and the COVID-19 pandemic. Community consultees were proud of historic uses of the land for farming and felt this should be retained. The concern that farming jobs would be lost was raised 32 times.

6.3.53 In addition, community consultees requested access to the ALC Survey or disputed the initial findings. This was raised 41 times.

6.3.54 The Newmarket Horsemen's Group, Suffolk Chamber of Commerce, Suffolk Preservation Society, CPRE and Newmarket and District Ramblers raised the loss of agricultural land. The Newmarket Horsemen's Group requested that the land classification survey was released for independent assessment. Moulton, Herringswell and Stansfield parish councils similarly expressed concern with the use of agricultural land and its impact on food production.

6.3.55 Community consultees were opposed to PRoWs being closed during the construction process. This was raised 61 times. Dalham Parish Council raised the need to ensure footpaths are reinstated, or that alternative routes are found.

6.3.56 The feedback received suggests that respondents feel current walking infrastructure connecting villages is inadequate. Community consultees were positive about opportunities for increased active travel routes as a result of the Scheme. This was raised 10 times, with suggestions for cycle routes and paths to increase connectivity between villages offered.

6.3.57 The Newmarket and District Ramblers highlighted opportunities to improve public rights of way in the area as there were currently not many in the Scheme boundary. The group proposed an off-road link between Isleham and West Row villages and a route between La Hogue and incorporating part of the Coach Road. The British Horse Society suggested that active travel routes created included horse-riding access.

6.3.58 The Suffolk Ramblers suggested that a buffer strip should be introduced at Bridleway 2 between Freckenham and Beck Bridge to avoid closure. They were also concerned about the U6006 and requested that it should not be closed and fencing should be sympathetic.

Applicant's Response

6.3.59 The Applicant has had regard to all comments relating to land use in **Appendix J-3**. With regard to the matters raised at 6.3.50 above, the Applicant has set out its approach in **Table 6-39** below.

6.3.60 The Applicant is proposing to temporarily close some PRoW during construction. The PRoWs would be closed for the shortest timeframe necessary. The Environmental Statement [EN010106/APP/6.1] assumes as a worst case scenario that each PRoW will be closed for up to three weeks during the construction phase.

6.3.61 When a PRoW is closed, there will be alternative options available in the local area. This would reduce the likelihood that recreational users would be diverted to alternative locations for recreation.

6.3.62 The Applicant is proposing to create a number of permissive routes within the Scheme to increase connectivity of the surrounding villages. Proposed locations are on Beck Road, to north-west of Sunnica East Site A; south of Freckenham Road, to the north-east of Sunnica East Site B; and on Elms Road, to the south of Sunnica East Site B.

Table 6-39 Regard had to comments relating to land use received from Section 47 consultation

Matter raised	Regard had to comment by the Applicant
Concern at the loss of agricultural producing land in the area	<p>Chapter 4: Alternatives and Design Evolution of the ES [EN010106/APP/6.1] explains the reasons for why the land selected for the Scheme is suitable for large scale solar generation. This is supported by Appendix 4A Alternative Sites Assessment of the ES [EN010106/APP/6.2] which provides a detailed assessment and consideration of alternative sites for the Scheme with reference to planning and environmental constraints of the land and operational requirements of the Scheme.</p> <p>Based on the assessments, the majority of land (96.2%) proposed for use within the Sites is classed as not being 'best and most versatile and is predominantly grades 3b and 4. The Applicant recognises the role of the planning system to assess the balance of the impact of withdrawing land from agricultural production for a period of time against the benefits of renewable energy generation. A fallow period will allow recovery of soil organic matter and remediate deep compaction from</p>

Matter raised	Regard had to comment by the Applicant
	<p>cultivation. Non-food crops are already grown in this area and on land within the Sites, including crop maize for anaerobic digesters and forage for the prominent local equestrian sector. The change in agricultural land-use within the Order limits and any direct effects due to this are analysed in Chapter 12 (Socio-Economics and Land Use) of the Environmental Statement [EN/1010106/APP/6.1].</p>
<p>Has the impact of losing agricultural production been factored into the cost-benefit analysis of the Scheme</p>	<p>The Applicant has assessed the lifecycle greenhouse gas impact of the Scheme in Section 6.8 of Chapter 6: Climate Change of the Environmental Statement [EN010106/APP/6.1], in line with relevant industry guidance. The Scheme has been assessed to have a major beneficial effect on the climate.</p> <p>The existing baseline in terms of carbon emissions from the Sites is not currently zero. Some of the crops grown on the agricultural land within the Order limits are currently exported internationally. The conversion of the land from arable crops, which are harvested yearly, to solar panels and native habitat planting (on 30% of the Scheme area) for 40 years, will result in a net saving in carbon dioxide alone, without accounting for the carbon saved through the renewable energy generation. Land use change as a result of the Scheme is anticipated to have a beneficial GHG impact of around 100,000 tonnes carbon dioxide equivalent (tCO₂e), largely due to the conversion of large areas of cropland to grassland, which has a higher carbon sequestration value than cropland. However, to ensure a robust assessment that assesses the worst case, it has been assumed that the existing greenhouse gas emissions associated with the Sites are zero. The amount of carbon used on importing food has not been calculated as it is not necessarily a true assumption that the construction of the Scheme would</p>

Matter raised	Regard had to comment by the Applicant
	<p>result in the need to import more food.</p> <p>There is expected to be no employment loss as a result of the Scheme; however, there may be some temporary farming jobs which will no longer be offered. This has been estimated to be close to two jobs related to agricultural activities based on information provided by the landowners to the promoter. Considering these are not permanent jobs which are being lost, the 'deadweight' employment has been assessed as one permanent job which would be lost. 'Deadweight' refers to outcomes which would have occurred without intervention such as if the Scheme were to result in a disruption to any existing economic activity currently occurring in relation to the Order limits. See Chapter 12 (Socio-Economics and Land Use) of the Environmental Statement [EN010106/APP/6.1] for further information. Further information is available in the Skills, Supply Chain and Employment Strategy, the implementation of which is secured by a requirement in Schedule 2 of the DCO.</p>
<p>Agricultural land might become more important throughout the Scheme's lifetime</p>	<p>Based on the assessments, the majority of land (96.2%) proposed for use within the Sites is classed as not being 'best and most versatile and is predominantly grades 3b and 4. The Applicant recognises that the role of the planning system to assess the balance of the impact of withdrawing land from agricultural production for a period of time against the benefits of renewable energy generation. A fallow period will allow recovery of soil organic matter and remediate deep compaction from cultivation. Non-food crops are already grown in this area and on land within the Sites, including crop maize for anaerobic digesters and forage for the prominent local equestrian sector. The change in agricultural land-use within the Order limits and any direct effects due to</p>

Matter raised	Regard had to comment by the Applicant
	this are analysed in Chapter 12 (Socio-Economics and Land Use) of the Environmental Statement [EN/1010106/APP/6.1].
Food production is central to the local economy and local supply chains and jobs will be affected	There is expected to be no employment loss as a result of the Scheme; however, there may be some temporary farming jobs which will no longer be offered. This has been estimated to be close to two jobs related to agricultural activities based on information provided by the landowners to the promoter. Considering these are not permanent jobs which are being lost, the 'deadweight' employment has been assessed as one permanent job will be lost. 'Deadweight' refers to outcomes which would have occurred without intervention such as if the Scheme were to result in a disruption to any existing economic activity currently occurring in relation to the Order limits. See Chapter 12 (Socio-Economics and Land Use) of the Environmental Statement [EN010106/APP/6.1] for further information. Further information is available in the Skills, Supply Chain and Employment Strategy, the implementation of which is secured by a requirement in Schedule 2 of the DCO.
Concern at the potential damage to the quality of the agricultural land during the Scheme's operating life	A fallow period will allow recovery of soil organic matter and remediate deep compaction from cultivation. Non-food crops are already grown in this area and on land within the Sites, including crop maize for anaerobic digesters and forage for the prominent local equestrian sector. The change in agricultural land-use within the Order limits and any direct effects due to this are analysed in Chapter 12 (Socio-Economics and Land Use) of the Environmental Statement [EN/1010106/APP/6.1].
The Agricultural Land Classification is	The Applicant's assessment of agricultural

Matter raised	Regard had to comment by the Applicant
outdated and not accurate	land classification within the Scheme can be found within Chapter 12 (Socio-economics and Land Use) of the Environmental Statement [EN010106/APP/6.1]. A baseline ALC survey has been undertaken and is presented in Appendix 12B Soils and Agriculture Baseline Report of the ES [EN010106/APP/6.2].
Existing public rights of way (PRoW) should not be closed during the construction and decommissioning phases of the Scheme	The Applicant is proposing to temporarily close some PRoW during construction. The PRoWs would be closed for the shortest timeframe necessary. The Environmental Statement [EN010106/APP/6.1] assumes as a worst case scenario that each PRoW will be closed for up to three weeks during the construction phase. When a PRoW is closed, there will be alternative options available in the local area. This would reduce the likelihood that recreational users would be diverted to alternative locations for recreation. Foreseeable closures of PRoWs are outlined in the Framework CTMP and Travel Plan (Appendix 13C of the ES [EN010106/APP/6.2]) and scheduled based on the final design which will aim to minimise the duration of closure. As the PRoWs will be closed for a short duration (maximum of 3 weeks) no diversions have been proposed.
Opportunities to upgrade existing PRoWs and create new PRoWs should be incorporated	The Applicant is proposing to create a number of permissive routes within the Scheme to increase connectivity of the surrounding villages. Proposed locations are on Beck Road, to north-west of Sunnica East Site A; south of Freckenham Road, to the north-east of Sunnica East Site B; and on Elms Road, to the south of Sunnica East Site B. Detail is contained within Chapter 12 (Socio-economics and Land Use) of the ES [EN010106/APP/6.1] and Appendix 10I: Outline LEMP

Matter raised	Regard had to comment by the Applicant
	[EN010106/APP/6.2].

Need

6.3.63 Key themes that were raised by community consultees included:

- a. There is a need for more renewable energy generation in the UK;
- b. The scale of the development is too large;
- c. The scale of the Scheme is inefficient, and more justification for the size of the site is needed as it is significantly larger than other solar farms in the UK;
- d. The Scheme would be one of the largest in Europe;
- e. The scale of the Scheme should be reduced;
- f. The Scheme should be dispersed into smaller sites to reduce the visual impact;
- g. More information on the electrical generating capacity of the Scheme is needed to consider the benefits of the Scheme;
- h. There is too much renewable energy generation in the area already;
- i. The Scheme is primarily for energy trading through the BESS, and not for green electricity generation; and,
- j. The development of the Scheme is motivated by profit.

6.3.64 Consultees were generally supportive of renewable energy in principle and the need to tackle climate change. Eighty-six comments were supportive in principle of renewable energy but had reservations about the Scheme. A further 21 respondents felt that there was a need for more solar energy in the UK and were positive about the Scheme.

6.3.65 Some of the community feedback questioned whether the Scheme was motivated by renewable energy generation, or for alternative reasons such as energy trading using the BESS units, or for profit. The comment that the developers were motivated by profit was recorded 77 times.

6.3.66 Some comments questioned the need for the Scheme in the light of other renewable energy schemes already operating or planned in the area. This was recorded 47 times, and respondents cited nearby solar farms, as well as other renewable energy projects. Consultees who responded to this effect felt that the area had 'done its bit' in contributing to the UK's renewable electricity supply.

6.3.67 More information regarding the electrical generating capacity of the Scheme was requested in the feedback to allow respondents to consider the benefits of the Scheme. The Suffolk Chamber of Commerce and Newmarket Horsemen's Group requested the figures to allow the benefits of the Scheme to be weighed up.

6.3.68 The scale of the Scheme was the second most raised theme from community consultees. The comment that the proposed Scheme is too large was recorded 430 times.

Suffolk Chamber of Commerce questioned if the size was appropriate for where the Scheme is proposed to be located.

6.3.69 Additional comments concerning the scale of the Scheme asked for the scale to be reduced and felt that the design of the Scheme was too disparate and was spread over too large an area. More information was requested to justify the scale in relation to other solar energy projects in the UK.

Applicant's response

6.3.70 The Applicant has had regard to all comments relating to the need for the Scheme in **Appendix J-3**. With regard to the matters raised at 6.3.63 above, the Applicant has set out its approach in **Table 6-40** below.

6.3.71 In response to comments that the scale of the Scheme should be reduced, the Applicant has made a number of design changes as outlined in 6.3.44 to 6.3.48 and below.

Table 6-40 Regard had to comments relating to need received from Section 47 consultation

Matter raised	Regard had to comment by the Applicant
There is a need for more renewable energy generation in the UK	The Applicant notes and welcomes support for new renewable energy projects.
The scale of the development is too large	<p>There is a direct correlation between the amount of land required and the level of energy the Applicant would be able to produce if granted consent. This in turn has an impact on the contribution that the proposed Sunnica Energy Farm can make to the country's energy needs. The Applicant is bringing forward the Sunnica Energy Farm to meet an urgent national need for new, renewable, sources of electricity. Further information on this is provided within the Statement of Need [EN010106/APP/7.1] submitted as part of the DCO application.</p> <p>The areas for solar PV panels and associated infrastructure have been removed from E06 and E07, and instead will be set aside for habitat creation with Stone Curlew nesting plots integrated. These are now ECO1 and ECO2 shown in</p>

Matter raised	Regard had to comment by the Applicant
	<p>Figure 3-1 of the ES [EN010106/APP/6.3].</p> <p>Parcels E11 and E23 are no longer proposed to be built on and will now be planted with species-rich native grassland and set aside as part of the area marked ECO3 shown in Figure 3-1 of the ES [EN010106/APP/6.3]. This sites the developable solar area further away from Worlington. The areas where the solar PV panels and associated infrastructure can be located at E12 will benefit from increased planting to screen from nearby receptors. These changes are also shown in Figure 3-1 of the ES [EN010106/APP/6.3].</p> <p>Large areas of W03 and W04 are not proposed for solar development. W16 and W14 (as shown in figure 4-5 of the ES [EN010106/APP/6.3]) have also been removed from the Order limits, which also has the effect of setting the solar back further from residential dwellings.</p> <p>Further information on the Scheme design development can be found in the Design and Access Statement [EN010106/APP/7.3].</p>
<p>The scale of the Scheme is inefficient, and more justification for the size of the site is needed as it is significantly larger than other solar farms in the UK</p>	<p>The Applicant is bringing forward the Scheme to meet an urgent national need for new, renewable, sources of electricity. This need is established in the Overarching National Policy Statement (NPS) EN-1.</p> <p>Due to advances in technology, the power generated by solar plants is already at, or below, grid parity cost in the Great Britain. For this reason, solar is economically attractive against other forms of traditional and renewable energy generation in the UK. Solar projects of the scale proposed by the Applicant are able to deliver large amounts of renewable electricity during the 2020s to meet the UK's legal requirement</p>

Matter raised	Regard had to comment by the Applicant
	<p>to decarbonise. Further information on this is provided within the Statement of Need [EN010106/APP/7.1] submitted as part of the DCO application.</p> <p>The Planning Statement [EN010106/APP/7.2] accompanying the DCO application sets out how the national need for the Scheme outweighs any adverse impacts on the local environment.</p>
The Scheme would be one of the largest in Europe	<p>Chapter 4: Alternatives and Design Evolution of the ES [EN010106/APP/6.1] explains the reasons for why the land selected for the Scheme is suitable for large scale solar generation. This is supported by Appendix 4A Alternative Sites Assessment of the ES [EN010106/APP/6.2] which provides a detailed assessment and consideration of alternative sites for the Scheme with reference to planning and environmental constraints of the land and operational requirements of the Scheme. This analysis demonstrates that the site location is suitable. In terms of generating capacity, the proposed Scheme would not be the largest in Europe.</p>
The scale of the Scheme should be reduced	<p>The Applicant has revised the design of the proposed Sunnica Energy Farm following the statutory consultation. The areas where the solar PV panels and associated infrastructure can be located in Sunnica East Site A and B has been reduced in size. This will set back the Scheme from residential dwellings in the area. Parcels E07, E11, and E23 (as shown in figure 4-4 of the ES [EN010106/APP/6.3]) are no longer proposed to be built on. This sites the project further away from Isleham and Worlington. The areas where the solar PV panels and associated infrastructure can be located at E12 (as shown in Figure 3-1 of the ES [EN010106/APP/6.3]) will benefit from increased planting to screen from</p>

Matter raised	Regard had to comment by the Applicant
	<p>nearby receptors. The areas where the solar PV panels and associated infrastructure can be located at E33 will be set further back from Ferry Lane.</p> <p>The areas where the solar PV panels and associated infrastructure can be located in Sunnica West Site A has also been reduced. This will set the project further back from residential dwellings in the area. Large areas of W03 and W04 are not proposed for solar development and the areas where the solar PV panels and associated infrastructure can be located at W14 is being set back further from residential dwellings. Additional landscaping has been proposed at parcels W10, W11, and W15. These are shown in Figure 3-2 of the ES [EN010106/APP/6.3].</p> <p>The layout of the Scheme, including the parcels referenced, is shown in figures 3-1 and 3-2 (parameter plans) of the ES [EN010106/APP/6.3]. The Applicant notes that a number of comments relate to the parameter plans presented in the Preliminary Environmental Information Report (PEI Report) and the consultation booklet (Appendix G-4) and therefore references these in its response.</p>
<p>The Scheme should be dispersed into smaller sites to reduce the visual impact</p>	<p>The Applicant is of the view that the Scheme is not an alternative to a number of other, small, solar developments but will complement them in providing much needed new renewable energy to the national electricity grid. This is supported by the Overarching National Policy Statement (NPS) for Energy EN-1 (paragraph 3.3.25). The Applicant has provided a Statement of Need [EN010106/APP/7.1] as part of its DCO application setting out the need for the Scheme in the context of the need for renewable energy generation more widely. Within section 9.3 of the Statement of Need, the Applicant sets out the</p>

Matter raised	Regard had to comment by the Applicant
	<p>importance of scale in solar development. This is because it brings greater decarbonisation and economic benefits when compared to a number of smaller, independent schemes comprising an equivalent generating capacity.</p>
<p>More information on the electrical generating capacity of the Scheme is needed to consider the benefits of the Scheme</p>	<p>The Applicant did not provide information on the number of homes that it expects to be powered by the proposed Sunnica Energy Farm during the statutory consultation as it is not applying to generate a certain amount of electricity. Improvements in technology could allow the Applicant to generate larger volumes of electricity and therefore it wouldn't wish to be tied and restricted to a less efficient generating capacity. Further information on this is available in Chapter 3: Scheme description of the Environmental Statement [EN010106/APP/6.1]. Such an approach is common across renewable energy projects and the Applicant has not specified a generating capacity in the draft DCO [EN010106/APP/3.1] submitted as part of its DCO application. The development (including the solar generating station and BESS) will instead be controlled and limited by the DCO requirements, areas shown on the works plans, design principles (which include maximum parameters) and impacts assessed in the ES. This is more appropriate than limiting the development to a set capacity.</p>
<p>There is too much renewable energy generation in the area already</p>	<p>The Applicant has had regard to developments in the surrounding area in its assessment of cumulative impacts. This been carried out to ensure that the proposed Sunnica Energy Farm takes account of other developments in its final design. Further information can be found in Appendix 5A: Cumulative Schemes of the Environmental Statement [EN010106/APP/6.2]. The Applicant is bringing forward the proposed Sunnica Energy Farm to meet an urgent national</p>

Matter raised	Regard had to comment by the Applicant
	<p>need for new, renewable, sources of electricity. In selecting the sites for the proposed Sunnica Energy Farm, the Applicant considered a number of alternative sites, including brownfield sites. Further information can be found in Chapter 4: Alternatives and Design Evolution of the Environmental Statement [EN010106/APP/6.1].</p>
<p>The Scheme is primarily for energy trading through the BESS, and not for green electricity generation</p>	<p>The Applicant is proposing a Scheme that is viable without the BESS. The BESS compliments solar development as solar and other forms of renewable energy generation are intermittent by their nature. Battery storage means that electricity can be stored when more is being produced than is needed at a certain time and released again when it is needed. Battery storage contributes to the stabilisation of the national power grid. At times of an excess or shortfall in demand battery storage facilities can balance the grid by making up for any shortfalls or by removing power and storing it Co-locating BESS with solar PV brings additional operational benefits which the Applicant has outlined in Table 10-1 of the Statement of Need [EN010106/APP/7.1].</p>
<p>The development of the Scheme is motivated by profit</p>	<p>The Applicant is bringing forward the proposed Sunnica Energy Farm to meet an urgent national need for new, renewable, sources of electricity. Further information on this is provided within the Statement of Need [EN010106/APP/7.1]. The Scheme has been assessed to have a major beneficial effect on the climate. Further information can be found in Chapter 6: Climate Change within the Environmental Statement [EN010106/APP/6.1].</p>

Design

6.3.72 Key themes that were raised by community consultees included:

- a. The design of the Scheme is 'hotch-potch' and is too disparate;

- b. The Scheme's design is based on land availability as opposed to electricity generation;
- c. Efforts have been made to set back the Scheme in response to comments made during the non-statutory consultation;
- d. Burwell National Grid Substation should not be extended further;
- e. Parkland and community facilities should be included for residents;
- f. Mature planting should be used to screen the site; and,
- g. There is not enough information about components of the site, such as how many solar panels will be used and the storage capacity of the BESS.

6.3.73 Comments on the design of the Scheme focussed on the scale of the Scheme and the interconnected nature of it. There were mixed comments on the design, with some feeling it was sympathetic to the area and had responded to community feedback in the non-statutory consultation. However, others felt that the design was inefficient as it was too disparate and too far from Burwell National Grid Substation. Comments such as this were recorded 33 times. This was also raised in Herringswell Parish Council's response.

6.3.74 There were limited comments on the proposed extension to Burwell National Grid Substation, with 17 comments from the community feedback which discussed this explicitly. Twelve community consultees who raised this were against expansion generally, due to perceived impacts on health, wildlife, loss of farmland, and the proximity to Burwell village. Three community consultees expressed a preference for Option 3, one for Option 1, and one against Option 1. Reach Parish Council expressed a preference for Option 1 as it was felt this was likely to be the least visually intrusive.

6.3.75 The Newmarket and District Ramblers questioned the design of the Scheme, stating that it was based on the opportunity to buy and lease land and the effect this had on the Scheme's viability.

Applicant's response

6.3.76 The Applicant has had regard to all comments relating to the Scheme design in **Appendix J-3**. With regard to the matters raised at 6.3.72 above, the Applicant has set out its approach in **Table 6-41** below.

6.3.77 The Applicant has made a number of design changes as outlined in 6.3.44 to 6.3.48 and below.

Table 6-41 Regard had to comments relating to design received from Section 47 consultation

Matter raised	Regard had to comment by the Applicant
The design of the Scheme is 'hotch-potch' and is too disparate	Chapter 4: Alternatives and Design Evolution of the ES [EN010106/APP/6.1] explains the reasons for why the land selected for the Scheme is suitable for large scale solar generation. This is supported by Appendix 4A Alternative

Matter raised	Regard had to comment by the Applicant
	<p>Sites Assessment of the ES [EN010106/APP/6.2] which provides a detailed assessment and consideration of alternative sites for the Scheme with reference to planning and environmental constraints of the land and operational requirements of the Scheme.</p> <p>From the Point of Connection at Burwell a 15km radius is considered by Sunnica Limited to be the maximum viable distance for the area of search based on cost estimates provided by their independent connection provider/contractor. In addition, the layout has been determined by size of individual field, topography and shading, all of which have contributed to the final layout of the Scheme.</p>
<p>The Scheme's design is based on land availability as opposed to electricity generation</p>	<p>The Applicant disagrees with this assessment. The design of the Sunnica Energy Farm is the result of an iterative process and has evolved through consultation and the result of the Applicant's environmental surveys. From the Point of Connection at Burwell a 15km radius is considered by Sunnica Limited to be the maximum viable distance for the area of search based on cost estimates provided by their independent connection provider/contractor. In addition, the layout has been determined by size of individual field, topography and shading, all of which have contributed to the final layout of the Scheme. The Applicant has continued to review the Sunnica Energy Farm design in response to comments received during the statutory consultation. An updated project description has been submitted as part of the DCO application. This is available in Chapter 3: Scheme description of the Environmental Statement [EN010106/APP/6.1].</p>
<p>Efforts have been made to set back the Scheme in response to comments made</p>	<p>The Applicant has revised the design of the proposed Sunnica Energy Farm following the statutory consultation. The</p>

Matter raised	Regard had to comment by the Applicant
during the non-statutory consultation	<p>areas where the solar PV panels and associated infrastructure can be located in Sunnica East Site A and B has been reduced in size. This will set back the project sites further back from residential dwellings in Worlington. Parcels E11 and E23 are no longer proposed to be built on and will instead form part of area ECO3 (shown in Figure 3-1 of the ES [EN010106/APP/6.3]). The areas where the solar PV panels and associated infrastructure can be located at E12 will benefit from increased planting to screen from nearby receptors. This sites the areas where the solar PV panels and associated infrastructure can be located further away from Isleham. Further information can be found in the Design and Access Statement [EN010106/APP/7.3].</p>
Burwell National Grid Substation should not be extended further	<p>There is capacity at Burwell but the Burwell National Grid Substation needs to be extended to facilitate the Scheme. The two options proposed need to be located close to the existing substation for technical reasons. Details on the two options are provided in Chapter 3 of the ES [EN010106/APP/6.1].</p>
Parkland and community facilities should be included for residents	<p>The Applicant is not proposing to create public open space nor community facilities within the Order limits but is proposing to new permissive routes as a result of the Sunnica Energy Farm to improve the connectivity between villages. Where areas for mitigation are suggested, the Applicant intends these to boost biodiversity and retain the existing landscape character. The Applicant has revised the design of the Sunnica Energy Farm following the Statutory consultation. An updated project description has been submitted as part of the DCO application. This is available in Chapter 3: Scheme description of the Environmental Statement [EN010106/APP/6.1].</p>

Matter raised	Regard had to comment by the Applicant
<p>Mature planting should be used to screen the site</p>	<p>Mature trees are not being used as it is considered that they are unlikely to survive. Smaller trees, between 1 to 3.5 metres in height (in comparison to the top edge of a solar panel at 2.5m in height) will be used instead as these are considered to have a far higher chance of survival. Views will be softened to varying degrees from day 1 of the scheme. This is due to the retention of existing hedgerows and trees, in combination with new planting. As this planting establishes from day 1, the softening and screening of views will therefore increase and occur prior to year 15. Year 15 is an assessment timeline for the Environmental Statement rather than a constraint to the growth of new planting; i.e. it is a requirement of the industry guidance for landscape and visual assessment to provide an assessment of the impacts in Year 15. The vegetation will still offer some screening in earlier years.</p>
<p>There is not enough information about components of the site, such as how many solar panels will be used and the storage capacity of the BESS</p>	<p>The Applicant will be required to obtain approval for the detailed design of the Scheme once development consent is granted and prior to it commencing development. It is common for matters reserved for detailed design to be subject to approval post consent.</p> <p>The Applicant has within its Application stated the parameters for which it is seeking development consent. As such the Applicant will only be able to build the proposed scheme within the areas shown on the Works Plans [EN010106/APP/2.2] and within defined parameters that have been used for the purposes of environmental assessment. Each key piece of infrastructure, such as the BESS, must be built within the parameters that have been set out in the Application. These parameters are secured by the DCO ([EN010106/APP/3.1]. Therefore, there will be certainty of the parameters of development. This will not include number</p>

Matter raised	Regard had to comment by the Applicant
	<p>of solar panels as that metric is not relevant, rather the size of the PV panels are and they will be subject to control by the development consent order.</p> <p>The Applicant will confirm the energy storage capacity for the BESS as part of the detailed design that we will be prepared if a DCO is granted. It is common for matters reserved for detailed design to be agreed at a later date in the process. It is important to note that the key design parameters that could cause environmental effects are fixed by the Applicant's DCO application and have been assessed within the ES [EN010106/APP/6.1]. This ensures that the Applicant has assessed, and where required proposed mitigation for, the maximum environmental impact of its proposals.</p> <p>Battery energy storage technology is the subject of much innovation. It is therefore important that the Applicant is able to allow for flexibility within its DCO application to deliver a final design (subject to received development consent) that can take advantage of the latest developments in technology and therefore can maximise the benefits associated with BESS development. For this reason, it is not appropriate to fix the storage capacity at the consenting stage as doing so could risk limiting the potential benefits of the Scheme.</p>

Cable route

6.3.78 Key themes that were raised by community consultees included:

- The cable route is too long;
- The length of the cable route means too much electricity will be lost during transmission;
- An area of 15km to the point of connection is uneconomic;
- Underground cabling is preferred as the visual impact is reduced;

- e. Underground cabling will cause more disruption than overground cabling;
- f. The cable route criss-crosses rivers, roads, pathways, and wildlife corridors; and,
- g. The Applicant will use compulsory purchasing powers to lay the cable route.

6.3.79 Respondents commenting on the cable route did so most commonly under Question 2 of the feedback questionnaire.

6.3.80 Nine comments welcomed the fact that the cables are proposed to be underground. However, other respondents stated that overground cabling would be preferred. This was due to the perceived disruption and increased emissions of cable laying relative to other methods of electricity transmissions.

6.3.81 Most comments concentrated on the length of the cable route and distance of the Scheme from the grid connection point at Burwell National Grid Substation. The view that the route was too long was raised 28 times. A further 15 comments felt that the length route was inefficient and would lead to energy loss. Respondents objected to the amount of land that would be disrupted because of cable laying. The Suffolk Preservation Society asked for clarification around the proposed ground levelling and spoil heaps from the cable routes.

Applicant's response

6.3.82 The Applicant has had regard to all comments relating to the Scheme design in **Appendix J-3**. With regard to the matters raised at 6.3.78 above, the Applicant has set out its approach in **Table 6-42** below.

Table 6-42 Regard had to comments relating to the cable route received from Section 47 consultation

Matter raised	Regard had to comment by the Applicant
The cable route is too long	Appendix 4A Alternative Sites Assessment [EN010106/APP/6.2] includes the reasons for selecting the Burwell National Grid Substation and the area of search from this connection point. It also explains how suitable land within the area of search has been identified. The latter includes the process of excluding various planning and environmental constraints including best and most versatile agricultural land which is the characteristic of the land between Fordham and Burwell.
The length of the cable route means too much electricity will be lost during transmission	The Applicant's independent connection provider/contractor has determined that the viable maximum distance of the Scheme from the Point of Connection (POC) at Burwell is a 15km radius. This is because

Matter raised	Regard had to comment by the Applicant
	<p>efficiency losses would not be significant within this radius. From the POC at Burwell a 15km radius is considered by the Applicant to be the maximum viable distance for the area of search. This threshold was set based on an estimation of the maximum cost that would be viable for the Scheme to meet the target financial metrics. Further information is provided within Chapter 4: Alternatives and Design Evolution of the ES [EN010106/APP/6.1].</p>
<p>An area of 15km to the point of connection is uneconomic</p>	<p>A search radius of 15km was applied around Burwell Substation and this is considered to be economic for this Scheme. Chapter 4: Alternatives and Design Evolution of the ES [EN010106/APP/6.1] explains the reasons for why the land selected for the Scheme is suitable for large scale solar generation. This is supported by Appendix 4A Alternative Sites Assessment of the ES [EN010106/APP/6.2] which provides a detailed assessment and consideration of alternative sites for the Scheme with reference to planning and environmental constraints of the land and operational requirements of the Scheme including the reasons for the area of search identified.</p>
<p>Underground cabling is preferred as the visual impact is reduced</p>	<p>Cabling will be above ground level between the PV modules. These will be fixed to the mounting structure along the row of racks. Cabling between the PV modules and inverters and between the individual sites will be buried within underground trenches. A Scheme description has been included in Chapter 3: Scheme Description of the Environmental Statement [EN010106/APP/6.1].</p>
<p>Underground cabling will cause more disruption than alternatives</p>	<p>The Applicant is not proposing to use overground lines as part as the Scheme. Further information can be found in Chapter 3: Scheme description of the</p>

Matter raised	Regard had to comment by the Applicant
	Environmental Statement [EN010106/APP/6.1].
The cable route criss-crosses rivers, roads, pathways, and wildlife corridors	The cable route corridor will need to cross a range of existing infrastructure. Open cut trenching will be primarily utilised for crossings. Trenchless techniques, such as boring, micro-tunnelling or moling methods will be undertaken where the EIA or design concludes the need for an alternative to open trenching. Precautionary working methods will be implemented to minimise potential adverse effects during construction. This is outlined in the in the Framework CEMP [EN010106/APP/6.2] set out in Appendix 16C of the Environmental Statement.
The Applicant will use compulsory purchasing powers to lay the cable route	The Applicant has actively engaged all landowners and will continue to do so to reach voluntary agreements. Compulsory acquisition powers will only be utilised where agreement is not able to be reached. Justification for these powers is set out in the Statement of Reasons.

EIA process

6.3.83 Key themes that were raised by community consultees included:

- The proposed mitigation set out in the EIA is inadequate;
- The proposed mitigation measures are robust;
- Concern that the EIA process has been carried out appropriately;
- The assessment methodology used should be available to the public;
- More information is needed in regard to the protection of wildlife; and,
- Any mitigation measures will not outweigh the negative impact caused by the Scheme.

6.3.84 Eleven comments that were positive about the EIA process were recorded. The view that the assessment and mitigation set out in the PEI Report were inadequate was raised 30 times. A further 78 felt that the mitigation proposed in the EIA did not go far enough.

6.3.85 The Newmarket Horsemen's Group included in their representation a review of Chapter 8 of the PEI Report which raised concerns about the methodology and findings of

the assessment work undertaken. In light of this, the Group concluded that they could not rely on the conclusions of the report that sufficient mitigation had been undertaken.

6.3.86 They also noted that assessments on aspects of the Scheme included within the PEI Report had been undertaken by the Applicant only at this stage. They recommended independent scrutiny and assessments be undertaken to corroborate and add to the findings in the report. This included on the effect on agricultural land during the lifetime of the Scheme.

Applicant's response

6.3.87 The Applicant has had regard to all comments relating to the EIA process in **Appendix J-3**. With regard to the matters raised at 6.3.83 above, the Applicant has set out its approach in **Table 6-43** below.

Table 6-43 Regard had to comments relating to the EIA process received from Section 47 consultation

Matter raised	Regard had to comment by the Applicant
The proposed mitigation set out in the EIA is inadequate	The PEI Report was published at the start of the statutory consultation and included details of a number of aspects of the Scheme. The PEI Report was a snapshot of the Applicant's assessment activity at that time. It is common for matters reserved for detailed design to be agreed at a later date in the process. Therefore, it was not possible to provide some detail requested by community consultees in the PEI Report. The Applicant considers the amount of information published during the statutory consultation sufficient to enable meaningful consultation. Following the statutory consultation, the Applicant has continued to undertake further assessments and mitigation design prior to submitting the DCO application. Details of the mitigation measures are provided in each of the technical chapters 6 to 16 of the Environmental Statement [EN010106/APP/6.1].
The proposed mitigation measures are robust	This is noted. Monitoring will be implemented to determine that the objectives documented within the Outline

Matter raised	Regard had to comment by the Applicant
	LEMP (Appendix 10I of Environmental Statement [EN010106/APP/6.2]) are being achieved. A post-construction monitoring programme will be formalised and agreed as part of the detailed design stage and included within the finalised LEMP prior to construction.
Concern that the EIA process has been carried out appropriately	The Applicant has appointed AECOM to undertake EIA on its behalf. Although AECOM is employed by the Applicant for this purpose, the findings are impartial and based upon industry best practice.
The assessment methodology used should be available to the public	All of Sunnica's application documents will become available on the Planning Inspectorate's website following acceptance of the application for examination, following which, members of the local community will be able to comment upon them by way of relevant representations and subsequently during the course of the examination. This will allow ample opportunity for the application to be scrutinised by the local community.
More information is needed in regard to the protection of wildlife	The Applicant has assessed potential impacts on wildlife as part of the Scheme's EIA and no significant effects are identified. The Applicant is committed to achieving biodiversity net gain. The Applicant's approach to achieving this is presented in the Biodiversity Net Gain Report [EN010106/APP/6.7]. Monitoring will be carried out throughout the Scheme's operational lifetime to ensure the Applicant's ecological obligations are being met. The embedded mitigation in the Scheme includes areas of habitat creation and enhancement throughout the Order limits to provide benefit to the local wildlife. The Applicant has revised the design of the Scheme following the statutory consultation to increase land available for ecological mitigation.

Matter raised	Regard had to comment by the Applicant
Any mitigation measures will not outweigh the negative impact caused by the Scheme	The Applicant respectfully disagrees with this assessment. The Scheme has incorporated the principles of biodiversity net gain, and the Environment Statement [EN010106/APP/6.1] sets out how this will be achieved. The Applicant's approach to achieving biodiversity net gain is presented in Chapter 8 of the Environmental Statement [EN010106/APP/6.1]. The Scheme's embedded mitigation will (i) improve the existing habitat for species present within the area, (ii) increase the area of improved habitat to increase ranges of species already present, and (iii) increase the biodiversity and species richness of the area. A biodiversity net gain principle is to be enshrined through the measures in the Outline LEMP in Appendix 10I of the ES [EN010106/APP/6.2], which will be secured through the DCO.

Construction

6.3.88 Key themes that were raised by community consultees included:

- a. The proposed working hours are too long and should not include weekend work;
- b. The construction traffic will disrupt the local community;
- c. The noise from construction will be harmful to the local community;
- d. Two years is too long to carry out construction works;
- e. There are too many HGVs proposed during the construction phase;
- f. There will be dust and pollution created during the construction phase;
- g. Large-scale construction is inappropriate in a small, rural community; and,
- h. Jobs created during the construction phase will not benefit the local community.

6.3.89 Traffic impacts and the noise of construction were most raised as issues during this stage of the Scheme. Eighty-one comments received set out that the level of planned construction traffic during the 2-year construction period was too much and would overwhelm villages. Herringswell Parish Council raised the impact on rural roads closest to East A and B specifically.

6.3.90 Sixty-five comments stated that the construction would be disruptive generally, with 80 commenting specifically on the perceived noise pollution resulting from the construction.

6.3.91 Community feedback welcomed the provision of jobs created because of the construction phase. However, 19 comments were received that expressed the view that the jobs would not benefit the local community, and the Applicant would outsource construction.

6.3.92 Twenty-two comments raised the proposed working hours, requesting that these were reduced so that they did not include weekend work.

Applicant's response

6.3.93 The Applicant has had regard to all comments relating to construction in **Appendix J-3**. With regard to the matters raised at 6.3.88 above, the Applicant has set out its approach in **Table 6-44** below.

6.3.94 The Applicant will employ best practice measures which go beyond statutory compliance. Precautionary working methods will be implemented to minimise potential adverse effects during construction across the entire Scheme. This will be outlined in the Appendix 16C Framework CEMP of the Environmental Statement [EN010106/APP/6.2].

6.3.95 The Applicant has embedded significant mitigation within Chapter 13 Transport and Access of the Environmental Statement [EN/010106/APP/6.1]. This includes requiring construction traffic to travel outside of peak hours to reduce the impact of construction traffic during network peak hours as set out in the Framework CTMP and Travel Plan (presented in Appendix 13C of the ES [EN/010106/APP/6.2]) which has been published as part of the DCO application.

Table 6-44 Regard had to comments relating to construction received from Section 47 consultation

Matter raised	Regard had to comment by the Applicant
The proposed working hours are too long and should not include weekend work	Construction working hours on the Sunnica Energy Farm will run from Monday-Saturday 7am-7pm. Where on-site works are conducted outside of core working hours they will comply with restrictions outlined in the Appendix 16C Framework Construction Environmental Management Plan of the Environmental Statement [EN010106/APP/6.2] and any other restrictions agreed with relevant planning authorities. The Applicant recognises that construction can be disruptive and will adopt the Considerate Constructors Scheme to assist in reducing pollution and nuisance from the Scheme. The Applicant will employ best practice measures which go beyond statutory compliance. Precautionary working methods will be implemented to minimise potential adverse effects during construction across the

Matter raised	Regard had to comment by the Applicant
	entire Scheme. This will be outlined in the Appendix 16C Framework CEMP of the Environmental Statement [EN010106/APP/6.2].
The construction traffic will disrupt the local community	The Applicant has embedded significant mitigation within Chapter 13 Transport and Access of the Environmental Statement [EN/010106/APP/6.1]. This includes requiring construction traffic to travel outside of peak hours to reduce the impact of construction traffic during network peak hours as set out in the Framework CTMP and Travel Plan (presented in Appendix 13C of the ES [EN/010106/APP/6.2]) which has been published as part of the DCO application. The management plan will be adhered to by those travelling to and from the site. This will establish measures that will minimise the volume of HGV and staff traffic so far as reasonably practicable, and the impacts on the local community.
The noise from construction will be harmful to the local community	Construction noise levels will be controlled through the use of embedded mitigation and the use of the CEMP. A Framework CEMP has been submitted in Appendix 16C of the Environmental Statement [EN010106/APP/6.2]. Noise impacts from construction works are predicted to be negligible, and not significant as is set out in Chapter 11: Noise and Vibration of the Environmental Statement [EN010106/APP/6.1]. Precautionary working methods will be implemented to minimise potential adverse effects during construction across the entire Scheme. This is outlined in the Framework CEMP [EN010106/APP/6.2].
Two years is too long to carry out construction works	The Applicant envisages a construction period of two years. This has been considered in the assessment and is considered the worst case scenario as this will condense the number of traffic

Matter raised	Regard had to comment by the Applicant
	<p>movements in to a shorter period. Once built, solar farms are quiet neighbours and cause little disruption to their neighbours. The Applicant does recognise that construction is, by its very nature, disruptive and is proposing a number of measures to manage and mitigate this disruption. These measures would be in place for the duration that they are required during construction. Further information on the Applicant's approach to manage construction traffic, including information on HGV routing and on managing trips to/from the Scheme to avoid the highway network peak hours is provided in the Framework CEMP (Appendix 16C of the Environmental Statement [EN/010106/APP/6.2]).</p>
<p>There are too many HGVs proposed during the construction phase</p>	<p>Traffic studies and models were used to inform the assessment presented in Chapter 13 of the ES [EN010106/APP/6.1] and the production of the Framework CTMP and Travel Plan (Appendix 13C) and Transport Assessment (Appendix 13B) have used existing traffic flows as the baseline. These existing traffic flows have therefore been taken into account in the transport assessment, which has concluded that there will be no significant effects during construction.</p> <p>The Applicant has submitted a Framework CTMP and Travel Plan (Appendix 13C) [EN/010106/APP/6.2] as part of its DCO application. The management plan will be adhered to by those travelling to and from the site. This will establish measures that will minimise the volume of HGV and staff traffic so far as reasonably practicable, and the impacts on the local community. HGVs will be routed away from local villages as far as possible and will make use of the strategic road network. The CTMP includes measures that will avoid arrival of vehicles associated with the construction of the Scheme throughout the day to</p>

Matter raised	Regard had to comment by the Applicant
	<p>minimise the impact on the local community by avoiding the highway network's peak hours. It is anticipated that the AM and PM Scheme peak hours will be 06:00-07:00 and 19:00-20:00. This reflects the arrival and departure times of the staff.</p>
<p>There will be dust and pollution created during the construction phase</p>	<p>The Applicant has assessed the risk of dust and particulate matter impacts during construction in Chapter 14 Air Quality of the Environmental Statement [EN010106/APP/6.1]. No significant effects on air quality are anticipated. Mitigation measures to reduce potential impacts during the construction phase have been incorporated into Appendix 16C Framework CEMP of the Environmental Statement [EN010106/APP/6.2].</p>
<p>Large-scale construction is inappropriate in a small, rural community</p>	<p>The Applicant has revised the design of the Scheme following the Statutory consultation. An updated Scheme description has been submitted as part of the DCO application. The areas where the solar PV panels and associated infrastructure can be located in Sunnica East Site A and B has been reduced in size.</p> <p>A CEMP will be implemented to manage any environmental impacts of construction activities. This is proposed to be a requirement of the DCO and will be in accordance with the Framework CEMP which is provided at Appendix 16C of the ES [EN010106/APP/6.2].</p>
<p>Jobs created during the construction phase will not benefit the local community</p>	<p>The Applicant has assessed the impact of the Scheme on employment locally. The results of this assessment are set out in Chapter 12 of the Environmental Statement [EN010106/APP/6.1]. It is estimated that construction will generate 1,685 net additional jobs per annum, of which 1,483 will be within the study area for the socio-economics assessment (45-</p>

Matter raised	Regard had to comment by the Applicant
	minute travel time to the site).

Operations

6.3.96 Key themes that were raised by community consultees included:

- The operational lifetime is too short due to the scale of the proposal and should be lengthened;
- The operational lifetime is too long;
- The solar panels are inefficient and will need to be replaced during the lifetime of the Scheme;
- The solar panels used will need to be replaced due to technological change;
- The Rochdale Envelope is being used inappropriately to withhold detail of the proposals;
- There will be disruption during the operational lifetime as materials will need to be replaced;
- Replacing materials will increase the carbon footprint of the Scheme and this should be factored into quantification of the Scheme's carbon impact;
- There will be operational noise from equipment;
- More information on how the site will be maintained is needed; and,
- Scepticism that sheep will be used to maintain vegetation.

6.3.97 There were a mix of responses in respect to the operational lifetime of the Scheme. Some community consultees were concerned that the proposed operational lifetime of 40 years was too long, due to both technological change (raised 16 times) and the perceived inefficiency of the panels used (raised 5 times). However, others felt that the scale of the proposal justified a longer lifetime. Comments that the operational lifetime should be extended were recorded 19 times.

6.3.98 Community consultees also requested more information on upgrades and replacements that could take place during the Scheme's lifetime. This was in the context of community impacts as well as the carbon footprint of the Scheme.

6.3.99 Eight comments were supportive of sheep being used to graze within the Scheme. The feeling that this would not take place or shouldn't take place was recorded 13 times.

Applicant's response

6.3.100 The Applicant has had regard to all comments relating to operations in **Appendix J-3**. With regard to the matters raised at 6.3.96 above, the Applicant has set out its approach in **Table 6-45** below.

Table 6-45 Regard had to comments relating to operations received from Section 47 consultation

Matter raised	Regard had to comment by the Applicant
The operational lifetime is too short due to the scale of the proposal and should be lengthened	The design life of the proposed Sunnica Energy Farm will be 40 years. The DCO will require that the Scheme is decommissioned after 40 years of operation, and that requirement will be enforceable through the Planning Act 2008 against the person with the benefit of the Order at that time. Any development coming forward on the land at the end of the 40 years would be subject to its own planning consenting process, or alternatively, the operator of the Scheme at that time would need to apply to the Secretary of State for approval to vary the requirements to the DCO.
The operational lifetime is too long	The DCO will require that the Scheme is decommissioned after 40 years of operation, and that requirement will be enforceable through the Planning Act 2008 against the person with the benefit of the Order at that time. The DCO will also require the decommissioning of the Scheme in accordance with a DEMP. A DEMP has been prepared and is presented in Appendix 16E of the Environmental Statement [EN010106/APP/6.2] which provides the outline mitigation measures to be adhered to during decommissioning. The DCO includes a requirement in Schedule 2 requiring the preparation and approval of the DEMP substantially in accordance with the Framework DEMP, and for the approved DEMP to be implemented. Any development coming forward on the land after the decommissioning of the Scheme would be subject to its own planning consenting process.
The solar panels are inefficient and will need to be replaced during the lifetime of the Scheme	Solar photovoltaic panels degrade every year by an estimated 0.5% resulting in a lower level of production over a period of 30 - 40 years. Assuming that the 0.5% figure is accurate, the Scheme will be producing at 80% of its original operating

Matter raised	Regard had to comment by the Applicant
	<p>efficiency by the end of its 40 year operating life. During the Scheme's operating life, the operator may replace panels where degradation is such that they are no longer viable.</p>
<p>The solar panels used will need to be replaced due to technological change</p>	<p>The Applicant is bringing forward the Sunnica Energy Farm to meet an urgent national need for new, renewable, sources of electricity. Solar is not a 'white elephant' and is expected to form part of the UK's energy mix for the foreseeable future. Due to advances in technology, the power generated by solar plants is already at, or below, grid parity cost in the Great Britain. For this reason, solar is economically attractive against other forms of traditional and renewable energy generation in the UK. Solar projects of the scale proposed by the Applicant are able to deliver large amounts of renewable electricity during the 2020s to meet the UK's legal requirement to decarbonise. As such, solar projects are expected to play an important role in the UK's renewable energy mix. Further information on this is provided within the Statement of Need [EN010106/APP/7.1] submitted as part of the DCO application.</p>
<p>The Rochdale Envelope is being used inappropriately to withhold detail of the proposals</p>	<p>The Rochdale Envelope assesses the worst case in terms of parameters within the Scheme that will affect human and environmental receptors i.e., if any parameters in the Scheme were to change post-DCO Application, they can only be reduced and the environmental impact would only be minimised. It is used to provide flexibility in design options where details of the whole project are not available when the application is submitted, while ensuring the impacts of the final development are fully assessed during the EIA. It sets worst case parameters for the purpose of the assessment but does not constrain the Scheme from being built in a manner that would lead to lower environmental impacts. The draft DCO</p>

Matter raised	Regard had to comment by the Applicant
	<p>secures the likely worst case parameters, providing certainty that the impacts of the Scheme will be no worse than those assessed as part of this environmental assessment.</p> <p>The Applicant therefore considers the adoption of the Rochdale Envelope approach in the PEI Report and ES is appropriate, and it is not a means by which to avoid providing information. The Applicant considers the amount of information published during the statutory consultation sufficient to enable meaningful consultation.</p>
<p>There will be disruption during the operational lifetime as materials will need to be replaced</p>	<p>During the operational phase, activity within the Scheme will be minimal and will be restricted principally to vegetation management, equipment maintenance and servicing, replacement of any components that fail, and monitoring. It is anticipated that there will be up to 17 permanent members of staff who will monitor and maintain the site. Further information can be found in Appendix 16F: Framework OEMP of the Environmental Statement [EN010106/APP/6.2]</p>
<p>Replacing materials will increase the carbon footprint of the Scheme and this should be factored into quantification of the Scheme's carbon impact</p>	<p>As part of the PEI Report, the Applicant provided potential emissions for the production and transportation stages of the Scheme for each of the key elements. This can be found in Table 6-1 in Chapter 6: Climate Change of the PEI Report. This information is also provided in Chapter 6 of the ES [EN/010106/APP/6.1]. As part of this, greenhouse gas emissions associated with replacing broken components during the operation stage were applied to the product and transportation emissions calculated for the construction phase. During the operational phase, activity within the Scheme will be minimal. It is expected that there will be approximately 13 vehicles travelling to the Site daily.</p>

Matter raised	Regard had to comment by the Applicant
There will be operational noise from equipment	Noise impacts of the solar plant during the operational lifetime are predicted to equate to a negligible to minor adverse effect, which is not considered significant. This was outlined in Chapter 11: Noise and Vibration of the PEI Report. Updated assessments have been submitted as part of the ES [APP/010106/APP/6.1] Chapter 11. Information regarding operational noise modelling is presented in Appendix 11E Construction Traffic Noise Modelling of the Environmental Statement [EN010106/APP/6.2] including information regarding assumed sound levels of the Scheme's proposed inverters, transformers and battery units.
More information on how the site will be maintained is needed	During the operational phase, activity within the Scheme will be minimal and will be restricted principally to vegetation management, equipment maintenance and servicing, replacement of any components that fail, and monitoring. It is anticipated that there will be up to 17 permanent members of staff who will monitor and maintain the site. Further information can be found in Appendix 16F: Framework OEMP of the Environmental Statement [EN010106/APP/6.2]
Scepticism that sheep will be used to maintain vegetation	It is possible to use land within a solar farm for different purposes, including grazing, during the project's operational lifetime. It is likely that the vegetation will be maintained through a mixture of mowing and grazing. Further information can be found in Appendix 10I: Outline LEMP and Appendix 16F: Framework OEMP of the Environmental Statement [EN010106/APP/6.2].

Decommissioning

6.3.101 Key themes that were raised by community consultees included:

- a. The Applicant has not provided a 100% guarantee that the materials will be recycled;

- b. The materials used are toxic and will be left for future generations;
- c. Disposal of materials will contribute to carbon footprint of the Scheme;
- d. The Scheme will not be decommissioned properly at the end of its operating life;
- e. There are no guarantees that money will be ring-fenced towards meeting the decommissioning costs;
- f. The land will not be suitable to be returned to farmland;
- g. Like that the land will be returned to farmland;
- h. The land will be labelled as brownfield and will become vulnerable to future developments;
- i. The site should be upgraded instead of being decommissioned; and,
- j. Sunnica should not wait and hope for technological advances.

6.3.102 Community comments regarding the decommissioning of the Scheme were mostly collected in Question 3c of the feedback form. Comments can largely be grouped into three sub-themes: the disposal of the materials used, land use after the Scheme, and the cost of decommissioning.

Disposal of materials

6.3.103 Community consultees who commented on the disposal of the materials after the Scheme's lifetime were principally concerned with recycling and the likelihood of materials being removed from the area at the end of use. These were raised 41 times each. Respondents recognised that recycling of solar infrastructure was still evolving but felt there should be more guarantees that the Scheme should be recycled. This was also raised by CPRE.

Land use after the Scheme

6.3.104 Community consultees were positive about the area being returned to farmland at the end of the operational lifetime. Comments were raised that the Applicant had not given a guarantee that the land would be returned to farmland, or that it could be returned to farmland, after the decommissioning the Scheme. This concern was raised 102 times.

6.3.105 Especially, community consultees raised concern that the land would be categorised as brownfield land after the Scheme is decommissioned, leaving it more likely to be used for further development. Some respondents additionally felt that complete return to agriculture would not be possible due to land contamination or lack of use. The latter point was additionally raised by the Newmarket Horsemen's Group.

6.3.106 BCN Wildlife Trust, RSPB and the Suffolk Wildlife Trust requested that further information on habitat management be published to determine whether habitats created would be retained after the decommissioning to ensure a permanent biodiversity net gain. The CPRE felt the decommissioning proposes did not comply with Policy ENV6 of the East Cambridgeshire Local Plan.

Cost of decommissioning

6.3.107 Community consultees who commented on the cost of decommissioning felt that more reassurance was needed that the decommissioning could be carried out. The suggestion that a financial bond or an independent fund was created prior to commencement of the Scheme was raised 48 times. This was additionally requested by the CPRE.

6.3.108 The feeling that there was not enough detailed information about the plans to carry out decommissioning was raised 24 times, with respondents requesting to see plans of disposal and financial commitments prior to the commencement of the Scheme. Matt Hancock MP and Lucy Fraser MP's joint response also requested that further details of the process to establish the decommissioning bond were made available. Mildenhall High Town Council, Herringswell Parish Council, Newmarket Town Council and Stansfield Parish Council all raised points to this effect.

Applicant's response

6.3.109 The Applicant has had regard to all comments relating to decommissioning in **Appendix J-3**. With regard to the matters raised at 6.3.101 above, the Applicant has set out its approach in **Table 6-46** below.

Table 6-46 Regard had to comments relating to decommissioning received from Section 47 consultation

Matter raised	Regard had to comment by the Applicant
The Applicant has not provided a 100% guarantee that the materials will be recycled	<p>Prior to decommissioning, opportunities to minimise waste as far as possible will be explored. Possibilities to re-use or recycle materials will be explored before resorting to landfill options. There is a new industry emerging for recycling solar panels. This would be explored, in addition to any resale of any operational panels. Waste during the decommissioning phase will be dealt with as part of a Decommissioning Resource Management Plan (DRMP).</p> <p>A Framework DEMP has been submitted as part of the DCO Application in Appendix 16E of the Environmental Statement [EN010106/APP/6.2]. This requires the preparation of a DRMP in advance of decommissioning. This will provide further detail on techniques and specific facilities which would be required in advance of the decommissioning stage, in line with relevant legislation and guidance at that time. The DCO includes a requirement in Schedule 2 requiring the preparation and approval of the DEMP substantially in</p>

Matter raised	Regard had to comment by the Applicant
	<p>accordance with the Framework DEMP, and for the approved DEMP to be implemented. That requirement is enforceable via the Planning Act 2008 against the person with the benefit of the Order at that time.</p>
<p>The materials used are toxic and will be left for future generations</p>	<p>Toxic and hazardous waste will be treated by an authorised operator, and the transportation of hazardous waste will also require an authorised carrier. Materials are to be dealt with in accordance with the DEMP - a Framework DEMP has been submitted with the DCO Application, provided in Appendix 16E of the Environmental Statement [EN010106/APP/6.2]. A DRMP will be produced prior to decommissioning (as required by the DEMP), which will provide further details of waste management, including toxic and hazardous waste.</p> <p>The DCO includes a requirement in Schedule 2 requiring the preparation and approval of the DEMP substantially in accordance with the Framework DEMP, and for the approved DEMP to be implemented. That requirement is enforceable via the Planning Act 2008 against the person with the benefit of the Order at that time.</p>
<p>Disposal of materials will contribute to carbon footprint of the Scheme</p>	<p>The Applicant recognises that there will be impacts as well as benefits resulting from the Sunnica Energy Farm. These have been assessed through the Environmental Impact Assessment submitted as part of the DCO application. The Applicant has assessed the lifecycle greenhouse gas impact of the Scheme in Section 6.8 of Chapter 6 Climate Change of the Environmental Statement [EN010106/APP/6.1], in line with relevant industry guidance. The Scheme has been assessed to have a major beneficial effect on the climate. The Applicant has assessed the lifecycle greenhouse gas</p>

Matter raised	Regard had to comment by the Applicant
	<p>impact of the Sunnica Energy Farm. This identified and assessed GHG emissions arising as a result of the Sunnica Energy Farm to determine the net lifecycle GHG impact. This included procurement of materials and the impact of construction and decommissioning. During construction, a minor adverse effect on the global climate is anticipated. During operation, the Scheme has been assessed to have a major beneficial effect on the climate.</p> <p>For more information on the assumptions made and the scope of the assessment, please refer to Section 6.3 and Section 6.4 of Chapter 6 Climate Change of the Environmental Statement [EN010106/APP/6.1].</p> <p>A Framework DEMP is provided in Appendix 16E of the ES [EN010106/APP/6.2], which outlines the environmental mitigation measures that would be adopted during decommissioning of the Sunnica Energy Farm. The Waste Hierarchy will be adopted throughout decommissioning, which ensures that the avoidance and reduction in waste production is sought initially. Where it is not possible to avoid waste production, recycling options are explored. The final resort is disposal to landfill.</p>
<p>The Scheme will not be decommissioned properly at the end of its operating life</p>	<p>The DCO will require that the Scheme is decommissioned after 40 years of operation, and that requirement will be enforceable through the Planning Act 2008 against the person with the benefit of the Order at that time. The DCO will also require the decommissioning of the Scheme in accordance with a DEMP. A Framework DEMP has been prepared and is presented in Appendix 16E of the Environmental Statement [EN010106/APP/6.2] which provides the outline mitigation measures to be adhered to during decommissioning. The DCO</p>

Matter raised	Regard had to comment by the Applicant
	includes a requirement in Schedule 2 requiring the preparation and approval of the DEMP substantially in accordance with the Framework DEMP, and for the approved DEMP to be implemented. That requirement is also enforceable via the Planning Act 2008.
There are no guarantees that money will be ring-fenced towards meeting the decommissioning costs	The DCO will require that the Scheme is decommissioned after 40 years of operation, and that requirement will be enforceable through the Planning Act 2008 against the person with the benefit of the Order at that time. A Framework DEMP has been prepared and is presented in Appendix 16E of the Environmental Statement [EN010106/APP/6.2] which provides the outline mitigation measures to be adhered to during decommissioning. The DCO includes a requirement in Schedule 2 requiring the preparation and approval of the DEMP substantially in accordance with the Framework DEMP, and for the approved DEMP to be implemented. That requirement is also enforceable through the Planning Act 2008 against the person with the benefit of the Order.
The land will not be suitable to be returned to farmland	No significant residual effects on ecological features are predicted during decommissioning of the Scheme. The DCO consent will require the return of the land to its existing use and a DEMP will be prepared prior to decommissioning works commencing to outline how this will be achieved. Additionally, by increasing the area of long-term planting throughout the Site and giving the land a 'break' from the regular cycle of growth and harvesting, there is a likelihood that nutrients within the soils, including nitrogen compounds, will recover naturally over time.
The land will be labelled as brownfield and will become vulnerable to future	We respectfully disagree with this assessment. The DCO consent will require

Matter raised	Regard had to comment by the Applicant
developments	<p>the return of the land to its existing use and a DEMP will need to be prepared outlining how this will be achieved prior to decommissioning works commencing. Given the DCO requirement to decommission the Scheme, the land would not be considered brownfield land. It is proposed that ecological enhanced areas will be left and that these areas will not be returned to their existing state by the Applicant. The Applicant will be required to abide by the DCO consent (which will secure the DEMP) and legislation relevant at the time. The Framework DEMP is available in Appendix 16E of the ES [EN010106/APP/6.2].</p>
The site should be upgraded instead of being decommissioned	<p>The Applicant is requesting a DCO for temporary planning permission of 40 years. At the end of 40 years the project is required by the terms of the DCO to be decommissioned. Further details can be found in the Draft DCO [EN010106/APP/3.1].</p> <p>The DCO will require that the Scheme is decommissioned after 40 years of operation, and that requirement will be enforceable through the Planning Act 2008 against the person with the benefit of the Order at that time. Any development coming forward on the land at the end of the 40 years would be subject to its own planning consenting process, or alternatively, the operator of the Scheme at that time would need to apply to the Secretary of State for approval to vary the requirements to the DCO in order to operate is beyond the 40 years.</p>
Sunnica should not wait and hope for technological advances	<p>The Applicant will dispose of waste in accordance with the waste hierarchy. Opportunities to re-use material resources will be sought. If this is not possible, the Applicant will seek to recycle the components of the Scheme that can be recycled using today's technology. These</p>

Matter raised	Regard had to comment by the Applicant
	<p>include the solar PV panels, batteries, mountings, electrical infrastructure, cables and aggregates. The Applicant is conscious that technology is rapidly developing in this sector and where it has improved over the Scheme's operational lifetime, the Applicant would look to reflect these improvements.</p> <p>The DCO will require that the Scheme is decommissioned after 40 years of operation, and that requirement will be enforceable through the Planning Act 2008 against the person with the benefit of the Order at that time. A Framework DEMP has been prepared and is presented in Appendix 16E of the Environmental Statement [EN010106/APP/6.2] which provides the outline mitigation measures to be adhered to during decommissioning.</p> <p>Prior to decommissioning, opportunities to minimise waste as far as possible will be explored. Possibilities to re-use or recycle materials will be explored before resorting to landfill options. There is a new industry emerging for recycling solar panels. This would be explored, in addition to any resale of any operational panels. Waste during the decommissioning phase will be dealt with as part of a DRMP, which will be produced prior to decommissioning, and in line with relevant legislation and guidance at that time.</p> <p>The Framework DEMP requires the preparation of a DRMP in advance of decommissioning. This will provide further detail on techniques and specific facilities which would be required in advance of the decommissioning stage, in line with relevant legislation and guidance at that time. The DCO includes a requirement in Schedule 2 requiring the preparation and approval of the DEMP substantially in accordance with the Framework DEMP, and for the approved DEMP to be implemented. That requirement is</p>

Matter raised	Regard had to comment by the Applicant
	<p>enforceable via the Planning Act 2008 against the person with the benefit of the Order at that time.</p> <p>The DCO includes a requirement in Schedule 2 requiring the preparation and approval of the DEMP substantially in accordance with the Framework DEMP, and for the approved DEMP to be implemented. That requirement is also enforceable through the Planning Act 2008 against the person with the benefit of the Order.</p>

Ecology

6.3.110 Key themes that were raised by community consultees included:

- a. The Scheme will result in a loss of habitats for resident wildlife;
- b. Renewable energy generation should not come at the cost of the environment;
- c. Ecological impacts should be kept to a minimum;
- d. There will be permanent environmental damage;
- e. Wildlife will be displaced;
- f. Some wildlife may become trapped due to the proposed fencing;
- g. There will be an impact on birds using the site to nest and forage, especially on Stone Curlews; and
- h. Disturbance to wildlife during construction and decommissioning phases.

6.3.111 The potential impact of the Scheme on local ecology and biodiversity was frequently raised throughout the feedback received. Concern that the Scheme would result in a negative environmental impact generally was raised 134 times. The main issues raised are discussed in turn.

Wildlife

6.3.112 Within this sub-issue, community consultees most frequently raised the loss of wildlife as a result of the Scheme. This was raised 240 times. Community consultees expressed concern that the Scheme would lead to a loss of species and protected species, especially due to construction impacts. Concern that habitats would be impacted and removed were raised 203 times by community consultees.

6.3.113 Community consultees referenced a large amount of wildlife species believed to be within the Scheme boundary. The Scheme's impact on Stone Curlews was a popular concern amongst the community responses received. Comments relating to Stone Curlew were recorded 31 times from community feedback. Respondents felt that more extensive mitigation was needed to protect the foraging and nesting habitats of Stone Curlews.

6.3.114 The RSPB provided a detailed response regarding the potential impact of the Scheme on Stone Curlews in relation to Sunnica East. The response provided evidence that the Stone Curlew population identified within the PEI Report was functionally linked to the Breckland SPA population. Considering this, RSPB recommended an HRA was required and increased mitigation would be necessary. The response also asked for more information on the mitigating habitats currently proposed in terms of topography, size, proximity to permissive pathways and construction noise. Herringswell Parish Council endorsed the Joint Response from the local host authorities in regard to mitigation for Stone-Curlew. The Suffolk Wildlife Trust requested that the solar array in E23 should be removed due to the presence of acid grassland habitats.

Planting

6.3.115 Community consultees were keen to minimise the removal of trees and hedgerows from the Scheme boundary. Concern that trees and hedges would be destroyed was recorded 23 times throughout the community feedback. New planting introduced in the Scheme was requested to be sympathetic to the local area, using native species.

6.3.116 The suggestion that wildflower meadows should be incorporated in the Scheme was raised 32 times to improve biodiversity.

Applicant's response

6.3.117 The Applicant has had regard to all comments relating to ecology in **Appendix J-3**. With regard to the matters raised at 6.3.110 above, the Applicant has set out its approach in **Table 6-47** below.

6.3.118 It is predicted that the Scheme design has embedded significant mitigation to avoid significant adverse effects to important ecological features. No significant residual effects on ecology are predicted during construction, operation and decommissioning of the Scheme's lifetime. Some habitats would be restored and managed with the aim of increasing their biodiversity value in the long-term as set out within Appendix 10I Outline LEMP [EN010106/APP/6.2].

6.3.119 Permanent habitat loss has been minimised as far as reasonably practicable, with hedgerows and woodland areas retained, meaning the majority of wintering bird species will not be affected. Appendix 10I Outline LEMP [EN010106/APP/6.2] which will be secured through the DCO, sets out the measures proposed to mitigate the potential impacts and effects of the Scheme on biodiversity (and landscape) features, and to enhance the biodiversity, landscape and green infrastructure value of the Order limits.

Table 6-47 Regard had to comments relating to ecology received from Section 47 consultation

Matter raised	Regard had to comment by the Applicant
The Scheme will result in a loss of habitats for resident wildlife	It is predicted that the Scheme design has embedded significant mitigation to avoid significant adverse effects to important ecological features. No significant residual

Matter raised	Regard had to comment by the Applicant
	<p>effects on ecology are predicted during construction, operation and decommissioning of the Scheme's lifetime. Habitats temporarily lost or damaged during construction would be fully reinstated on a like-for-like basis at the same location on completion of construction works, where practical. Some habitats would be restored and managed with the aim of increasing their biodiversity value in the long-term as set out within Appendix 10I Outline LEMP [EN010106/APP/6.2]. As a result, no significant effects are predicted from loss of habitats. This is shown in Table 8-11 in Chapter 8 of the Environmental Statement [EN010106/APP/6.1].</p>
<p>Renewable energy generation should not come at the cost of the environment</p>	<p>The Scheme has been assessed to have a major beneficial, significant impact on global climate, due to reductions in greenhouse gas emissions because of the renewable nature of the Scheme. No significant residual effects on ecology are predicted during construction, operation and decommissioning within the Scheme's lifetime. A variety of measures are embedded within the Scheme proposals to improve the existing habitat for species already present in the area. We are aiming to improve habitats to increase the range of species already present and to increase the biodiversity and species richness of the area. This will help integrate the Scheme within the context of the existing landscape and prevent and reduce any adverse effects on the ecology of the site. A variety of habitats have been included within the Scheme design as embedded mitigation to further increase the biodiversity and species richness of the area.</p>
<p>Ecological impacts should be kept to a minimum</p>	<p>No significant residual effects on ecology are predicted during construction, operation and decommissioning of the Scheme's lifetime.</p>

Matter raised	Regard had to comment by the Applicant
There will be permanent environmental damage	<p>The Applicant is bringing forward the Scheme to meet an urgent national need for new, renewable, sources of electricity. Further information on this is provided within the Statement of Need [EN010106/APP/7.1] submitted as part of the DCO application. The Scheme has been assessed to have a major beneficial, significant impact on global climate, due to reductions in GHG emissions because of the renewable nature of the Scheme. No significant residual effects on ecology are predicted during construction, operation and decommissioning of the Scheme's lifetime.</p>
Wildlife will be displaced	<p>Permanent habitat loss has been minimised as far as reasonably practicable, with hedgerows and woodland areas retained, meaning the majority of wintering bird species will not be affected. The loss of any arable habitat, which in turn will lead to the displacement of wintering bird species reliant on this habitat, will be avoided as much as practicable and mitigated through the retention of existing grassland/cover crops and undeveloped mitigation areas. There will be avoidance of the nesting bird period i.e., March to August (inclusive) for vegetation clearance wherever possible. Any vegetation clearance proposed within the nesting bird period will be checked for the presence of any nests by a suitably qualified ornithologist, prior to vegetation removal, and if active nests are found, then appropriate buffer zones would be put in place and the area monitored until the young birds have fledged. Appendix 10I Outline LEMP [EN010106/APP/6.2] which will be secured through the DCO, sets out the measures proposed to mitigate the potential impacts and effects of the Scheme on biodiversity (and landscape) features, and to enhance the biodiversity, landscape and green infrastructure value</p>

Matter raised	Regard had to comment by the Applicant
	of the Order limits.
Some wildlife may become trapped due to the proposed fencing	Security fencing will be established at an early stage during construction to protect retained habitats during construction. The fence will be a 'deer fence', up to 2.5m in height. The erection of fencing will be undertaken to ensure that existing connectivity for wildlife will be maintained and species will be able to move through the site onto neighbouring farmland and will not be trapped within the Scheme.
There will be an impact on birds using the site to nest and forage, especially on Stone Curlews	<p>Permanent habitat loss has been minimised as far as reasonably practicable, with hedgerows and woodland areas retained, meaning the majority of wintering bird species will not be affected. The loss of any arable habitat, which in turn will lead to the displacement of wintering bird species reliant on this habitat, will be avoided as much as practicable and mitigated through the retention of existing grassland/cover crops and undeveloped mitigation areas. There will be avoidance of the nesting bird period i.e., March to August (inclusive) for vegetation clearance wherever possible. Any vegetation clearance proposed within the nesting bird period will be checked for the presence of any nests by a suitably qualified ornithologist, prior to vegetation removal, and if active nests are found, then appropriate buffer zones would be put in place and the area monitored until the young birds have fledged. Appendix 10I Outline LEMP [EN010106/APP/6.2] which will be secured through the DCO, sets out the measures proposed to mitigate the potential impacts and effects of the Scheme on biodiversity (and landscape) features, and to enhance the biodiversity, landscape and green infrastructure value of the Order limits.</p> <p>The provision of offsetting habitat for Stone Curlew has been informed by the species</p>

Matter raised	Regard had to comment by the Applicant
	distribution across the Scheme. Surveys undertaken by AECOM have shown that the nesting distribution of Stone Curlew is determined by the crop types present in any given year. The Scheme has embedded approximately 108ha of land for creation of Stone Curlew nesting and foraging habitat, in areas currently in arable farming. These areas are shown on the parameter plans included as figures 3-1 and 3-2 of the Environmental Statement [EN010106/APP/6.3].
Disturbance to wildlife during construction and decommissioning phases	It is predicted that the Scheme design has embedded significant mitigation to avoid significant adverse effects to important ecological features. No significant residual effects on ecology are predicted during construction, operation and decommissioning of the Scheme's lifetime. Habitats temporarily lost or damaged during construction would be fully reinstated on a like-for-like basis at the same location on completion of construction works, where practical. Some habitats would be restored and managed with the aim of increasing their biodiversity value in the long-term as set out within Appendix 10I Outline LEMP [EN010106/APP/6.2]. As a result, no significant effects are predicted from loss of habitats. This is shown in Table 8-11 in Chapter 8 of the Environmental Statement [EN010106/APP/6.1].

Landscape and visual amenity

6.3.120 Key themes that were raised by community consultees included:

- Community consultees dislike the visual impact of solar panels;
- The BESS are too tall and unsightly;
- The Scheme will ruin local landscapes;
- The visual impact from the Limekilns will be significant;
- The rural nature of the landscape will be changed to industrial;
- The visual impacts cannot be mitigated;

- g. The countryside is currently used for recreation and this will be ruined by the Scheme;
- h. Viewpoints between the villages will be destroyed;
- i. The photomontages are not accurate;
- j. The visual impact of the Scheme will ruin PRowWs and permissive routes;
- k. The permissive route, U6006 Badlingham Lane (southwest of Worlington), will be impacted;
- l. The solar panels will create glint and glare which will affect road users as well as air traffic; and,
- m. The screening proposed will take too long to mature and will not screen the Scheme effectively for 15 years of the proposed lifetime of the Scheme.

Visual impact

6.3.121 A high proportion of community consultees were concerned about the visual impact of the solar panels and the impact on the local landscape.

6.3.122 Ninety-two community consultees stated they did not like the visual impact of solar panels.

6.3.123 The comment that the Scheme would ruin local landscapes was recorded 132 times, and the feeling that the Scheme would result in a loss of countryside views 133 times. A further 91 community consultees went on to state that the Scheme would turn the rural nature of the area to industrial.

6.3.124 The Newmarket Horsemen's Group raised the historical relationship between the horse-racing industry and the landscape, especially the visual impact of Sunnica West A from the Limekilns viewpoint. The impact on this viewpoint was also raised by Newmarket Town Council. The CPRE commented on the effect of the Scheme on the views from the hills south of Newmarket and from Dalham Hall.

6.3.125 Some community consultees raised the impact of the Scheme on local permissive paths and PRowWs, such as the Icknield Way and U6006. Those who commented on this felt that the amenity of walking routes would be reduced due to the visual impacts of the Scheme.

6.3.126 Twenty comments were received which felt that the height of the BESS meant that the units would be too obtrusive and would be difficult to screen.

Screening

6.3.127 A large number of community consultees who commented on the proposed screening of the Scheme were concerned that planting used for screening would take too long to grow. This was raised 96 times, with feedback suggesting planting mature trees or planting at the beginning of the construction timescale. Others commented on the opportunity to create interesting and biodiverse screening using native species of vegetation. Herringswell Parish Council felt that the screening was ineffective and poor in design and as such would not mitigate the visual impact of the Scheme.

6.3.128 The Suffolk Preservation Society asked for clarification on the scale of the fencing proposed.

Applicant's response

6.3.129 The Applicant has had regard to all comments relating to landscape and visual impact in **Appendix J-3**. With regard to the matters raised at 6.3.120 above, the Applicant has set out its approach in **Table 6-48** below.

6.3.130 Vegetation planting has been proposed throughout and around the Scheme as part of the design to enhance the landscape and screen views of the infrastructure. The design has taken the structure of the existing landscape into account. An LVIA has been undertaken to assess the effects on landscape and visual receptors in the vicinity of the Scheme, such as residents, recreational users of PRoW, motorists, etc. The conclusions of this assessment have been presented in Chapter 10 of the Environmental Statement [EN010106/APP/6.1].

6.3.131 The Applicant is proposing a number of design changes to mitigate any visual impact, as set out in 6.3.44 to 6.3.48 and below.

Table 6-48 Regard had to comments relating to landscape and visual amenity received from Section 47 consultation

Matter raised	Regard had to comment by the Applicant
Community consultees dislike the visual impact of solar panels	Chapter 10: Landscape and Visual Impact Assessment of the ES [EN010106/APP/6.1] sets out the predicted effects to the landscape character. The Scheme design incorporates measures to reduce the likely landscape effects so that the perception of the rural landscape remains.
The BESS are too tall and unsightly	The Landscape and Visual Impact Assessment (LVIA), as set out in Chapter 10 of the Environmental Statement [EN010106/APP/6.1] acknowledges that the BESS will result in adverse visual effects once implemented. This has informed the Scheme design, with new areas of proposed tree planting around the BESS, so as to reduce the visual impact of the BESS. In addition, the colour tone of the BESS would be sympathetic to the colour tones of the landscape, so as to better integrate the BESS within the landscape.
The Scheme will ruin local landscapes	A suite of specialist reports have been undertaken by the Applicant to assess the potential impacts resulting from the Scheme. These include a full landscape

Matter raised	Regard had to comment by the Applicant
	<p>and visual impact assessment alongside a landscape character assessment that have been undertaken regarding the Scheme. Full details of each of these assessments can be found in the Environmental Statement [EN010106/APP/6.1].</p> <p>Taking into account the feedback from the PEI Report and the results of the specialist surveys and studies a suite of landscape mitigation measures and design changes have been proposed to mitigate the impacts of the Scheme. This has included the removal of some areas previously suggested for solar use; the addition of 'set back' areas from field edges closest to human receptors and the introduction of a large amount of tree and grassland planting.</p>
The visual impact from the Limekilns will be significant	<p>Due to the elevated position of the view, most of the Sunnica West Site A is visible from the Limekilns, part of the Jockey Club training grounds. These grounds and the intervening landscape are required to be open in character and along with ecological designations would not be suitable for planting. This is the reason it is considered not practicable for offsite mitigation.</p>
The rural nature of the landscape will be changed to industrial	<p>The Applicant respectfully disagrees with this comment. Whilst it is understood that the Scheme is different to what is on the site now, the Applicant does not consider the impact of solar to be negative or industrialising. The Applicant considers the Scheme has been designed to take into account the potential impact on the landscape and provided significant embedded mitigation leading to very few residual significant landscape and visual effects. In addition, the impact is considered acceptable in the context of the importance and benefits that the Scheme will bring. This has been set out in the Statement of Need [EN010106/APP/7.1].</p>

Matter raised	Regard had to comment by the Applicant
	<p>The Applicant has committed to delivering a biodiversity net gain. The Applicant's approach to achieving biodiversity net gain is outlined in its ES [EN010106/APP/6.1].</p>
<p>The countryside is currently used for recreation and this will be ruined by the Scheme</p>	<p>Any tonal, impulsive or intermittent acoustic features from the Burwell National Grid Substation Extension will be carefully considered and specific noise control and mitigation measures will be included. This includes procuring equipment with lower (than modelled) sound power levels, silencers and/or acoustic barriers on equipment, and dynamic vibration absorbers and acoustic active cancelling for power transformers as necessary. These effects on human health are considered to be not significant.</p> <p>Vegetation planting has been proposed throughout and around the Scheme as part of the design to enhance the landscape and screen views of the infrastructure. The design has taken the structure of the existing landscape into account. An LVIA has been undertaken to assess the effects on landscape and visual receptors in the vicinity of the Scheme, such as residents, recreational users of PRow, motorists, etc. The conclusions of this assessment has been presented in Chapter 10 of the Environmental Statement [EN010106/APP/6.1]. The Scheme will not permanently affect any PRow during operation. In fact, new permissive routes are being created that will be open to the public to use throughout operation of the Scheme. These will open up access between existing PRow. The human health assessment provided in Chapter 15 of the ES [EN010106/APP/6.1] has assessed the impact of these and access to open space, and concluded that this will provide a beneficial effect to human health during operation (not significant). The locations of these permissive routes to be created are shown in Figure 12-6 of the ES</p>

Matter raised	Regard had to comment by the Applicant
	<p>[EN010106/APP/6.3].</p> <p>During construction, some PRow will need to be closed for up to 3 weeks each. Those that would need to be closed are shown in Figure 12-5 of the ES [EN010106/APP/6.3]. The effect of this disruption and reduced access on human health has been assessed in Chapter 15 of the ES [EN010106/APP/6.1], and an adverse effect (not significant) was concluded. The interactions of effects (i.e., intra-project cumulative effects) from the impacts on views and traffic increases on the health of local residents and recreational users of footpaths during construction has been assessed in Chapter 17 of the ES [EN010106/APP/6.1]. The effect interaction from landscape, visual and increased traffic has been assessed as not significant during construction. User's access to open spaces has been considered in Chapter 15 Human Health of the Environmental Statement [EN010106/APP/6.1].</p>
Viewpoints between the villages will be destroyed	<p>The views between villages will not be destroyed. The Scheme design has been revised following consultation and panels are not proposed to the west of Beck Road. In combination with the set back of panels to the east of Beck Road, views will remain between Freckenham and Isleham.</p>
The photomontages are not accurate	<p>The Visualisations have been prepared in accordance with the Landscape Institute Technical Guidance Note 06/19: Visual Representation of Development Proposals and represent 'Type 4' visualisations. Full detail of the photomontage methodology was included as part of the ES, under Appendix 10C: LVIA Methodology [EN010106/APP/6.2]. Additional images have been included to show the scheme all on one page.</p>

Matter raised	Regard had to comment by the Applicant
<p>The visual impact of the Scheme will ruin PRoWs and permissive routes</p>	<p>Chapter 10: Landscape and Visual Impact Assessment of the ES [EN010106/APP/6.1] sets out the predicted visual effects along with the proposed mitigation to reduce the visibility of the Scheme. This includes assessments at a variety of viewpoint locations including existing PRoW. With the establishment of the proposed mitigation, the ES predicts that the visual amenity will not be lost.</p>
<p>The permissive route, U6006 Badlingham Lane (southwest of Worlington), will be impacted</p>	<p>The Applicant has revised the Scheme proposals following the statutory consultation and has made the following changes to the Scheme design as illustrated on the Parameter Plans in the Environmental Statement (Figure 3-1 and Figure 3-2) [EN010106/APP/6.3]: The extent of panels in proximity to U6006 has been reduced, with E11 and E23 removed and replaced by grassland ECO3. The incorporation of ECO3 increases the set back of panels from Worlington and West Row. The recreational value of U6006 will remain, along with improved recreational linkages via new permissive paths. Route U6006 is well vegetated, with parts of the route well enclosed by established trees. The perception of the Scheme will therefore vary from along U6006 and will reduce further with the establishment of new planting.</p>
<p>The screening proposed is inadequate and will not mitigate the impact</p>	<p>The Applicant respectfully disagrees. There is a substantial extent of new planting across the Scheme to address potential visibility from homes, roads and lanes. This is in combination with the solar panels being offset from homes, roads and lanes and existing roadside vegetation retained where practicable. Chapter 10: Landscape and Visual Impact Assessment of the ES [EN010106/APP/6.1] includes photomontages (before and after images) which demonstrate screening from new</p>

Matter raised	Regard had to comment by the Applicant
	planting.
<p>The solar panels will create glint and glare which will affect road users as well as air traffic</p>	<p>The Application has assessed the Scheme's potential impact on glint and glare as part of the Environmental Statement (Appendix 16A [EN010106/APP/6.2]) submitted as part of the Applicant's DCO application. This has concluded that no impacts are possible for RAF Mildenhall as no solar reflections are predicted towards any of the scoped and assessed aviation receptors. No detailed modelling was recommended for RAF Lakenheath as no significant impacts are expected given the significant distance of the airfield from the Scheme. The Applicant has also assessed the potential of the Scheme to attract flocking birds to the area such that it might raise the risk of a bird strike. The Scheme will not create habitat that will attract significant numbers of flocking birds to the extent that they would pose a risk to aviation, and the Scheme is not located in area close to any large water bodies which may attract large groups of flocking birds.</p> <p>Potential impacts of glint and glare on users of the A11 and A14 were assessed as part of the Scheme's Environmental Impact Assessment. Only one effect was identified to road users along the A14 in the absence of mitigation; road users travelling in a south-westerly direction on a section of the A14 adjacent to Sunnica West Site A will have views of the panels for approximately 200m, with the potential for glint and glare. Although the road users would only be in the reflection zone momentarily, this is considered sufficient to result in a potential safety hazard and therefore mitigation will be provided for the road users travelling in a south-westerly direction in the form of a temporary solid hoarding that will be 2.5m in height. The hoarding would be located on a short section, approximately 300m, along the</p>

Matter raised	Regard had to comment by the Applicant
	<p>Sunnica West Site A boundary with a high percentage of evergreen (native and non-native) species planted adjacent to the temporary hoarding along the roadside in line with the indicative planting strategy. With the hoarding in place, there will be no effects from glint and glare on the users of the A14 or A11.</p> <p>Further details can be found in Chapter 16 of the Environmental Statement [EN010106/APP/6.1].</p>
<p>The screening proposed will take too long to mature and will not screen the Scheme effectively for 15 years of the proposed lifetime of the Scheme</p>	<p>Mature trees are not being used as it is considered that they are unlikely to survive. Smaller trees, between 1 to 3.5 metres in height (in comparison to the top edge of a solar panel at 2.5m in height) will be used instead as these are considered to have a far higher chance of survival. Views will be softened to varying degrees from day 1 of the scheme. This is due to the retention of existing hedgerows and trees, in combination with new planting. As this planting establishes from day 1, the softening and screening of views will therefore increase and occur prior to year 15. Year 15 is an assessment timeline for the Environmental Statement rather than a constraint to the growth of new planting; i.e. it is a requirement of the industry guidance for landscape and visual assessment to provide an assessment of the impacts in Year 15. The vegetation will still offer some screening in earlier years.</p>

Heritage assets

6.3.132 Key themes that were raised by community consultees included:

- a. There will be an impact on cultural heritage;
- b. The Scheme could disturb important archaeological remains;
- c. The Scheme is too close to designated heritage assets;
- d. A full archaeological evaluation needs to be undertaken;
- e. The rural landscape is historic in character and this will be impacted by the Scheme, and,

- f. The villages are historic in character and their setting will be impacted by the Scheme.

6.3.133 The most common concern within this section was that there would be damage to archaeology as a result of the Scheme, which was raised 55 times throughout the community feedback. Herringswell Parish Council raised this specifically in relation to buried archaeology around Freckenham Village, stating that the proposal does not give weight to heritage assets.

6.3.134 Community consultees were also concerned that the Scheme would negatively impact the setting of cultural heritage sites in the area. Heritage assets such as Chippenham Hall, Fordham Abbey, and the Isleham plane crash site were included as assets that were felt could be harmed due to the Scheme.

6.3.135 Community consultees most frequently raised the potential impacts on Chippenham Hall and the surrounding Chippenham Park and Gardens. This was raised 33 times. The Gardens Trust were positive about the opportunities to improve and enhance the Chippenham Park grounds as a result of the Scheme and felt the proposed mitigation would adequately form a visual boundary with the Scheme. The Trust raised the possibility of creating a permissive route along the former drive.

6.3.136 The Suffolk Protection Society requested that more ground truthing and up to date archaeological surveys were needed before the submission.

Applicant's response

6.3.137 The Applicant has had regard to all comments relating to heritage in **Appendix J-3**. With regard to the matters raised at 6.3.132 above, the Applicant has set out its approach in **Table 6-49** below.

6.3.138 Areas for archaeological mitigation have been included within parcels W03, W04 (shown in Figure 3-2 of the ES [EN010106/APP/6.3]), and E33 (shown in Figure 3-1 of the ES [EN010106/APP/6.3]) in support for the conclusions of archaeological surveys carried out in the Order limits.

6.3.139 The Applicant's DCO application documents include assessment of the Scheme's impacts on heritage assets through photomontages. These include views to and from of notable designated and non-designated archaeological and historic landscape assets. The photomontages can be found in the Environmental Statement Figures [EN010106/APP/6.3].

Table 6-49 Regard had to comments relating to heritage received from Section 47 consultation

Matter raised	Regard had to comment by the Applicant
There will be an impact on cultural heritage	The Applicant considers that the mitigation measures embedded in the Scheme's design are sufficient to mitigate impacts on identified heritage assets and the region's cultural heritage. The Applicant has

Matter raised	Regard had to comment by the Applicant
	<p>continued to refine its Scheme proposals following the statutory consultation including its mitigation strategy for heritage assets. This has included ongoing engagement with Historic England and other interested stakeholders. The Applicant's assessments of the Scheme's impacts on heritage, and its proposed mitigation measures are set out in Chapter 7 of the Environmental Statement [EN010106/APP/6.1].</p>
<p>The Scheme could disturb important archaeological remains</p>	<p>Following the conclusion of the statutory consultation, the Applicant has continued to carry out archaeological assessments including trial trenching. The outcomes of these assessments have resulted in revisions to the design of the Scheme. Areas for archaeological mitigation have been included within parcels W03, W04 (shown in Figure 3-2 of the ES [EN010106/APP/6.3]), and E33 (shown in Figure 3-1 of the ES [EN010106/APP/6.3]) in support for the conclusions of archaeological surveys carried out in the Order limits. The full results of the Applicant's assessments carried out in relation to heritage can be found in Chapter 7 of the Environmental Statement [EN010106/APP/6.1] submitted as part of the DCO application.</p>
<p>The Scheme is too close to designated heritage assets</p>	<p>The full results of the Applicant's assessments carried out in relation to heritage can be found in Chapter 7 of the Environmental Statement [EN010106/APP/6.1] submitted as part of the DCO application. The Applicant has developed its assessment of the Scheme's impact on heritage assets by using best practice and in consultation with statutory bodies including Historic England and the local authorities. The Applicant has sought to avoid impact on heritage assets throughout the design process. Where avoidance of heritage assets has not been possible, the Applicant has embedded</p>

Matter raised	Regard had to comment by the Applicant
	<p>significant mitigation within the Scheme to reduce the impacts on the setting of built heritage and historic landscape assets. The Applicant's proposed mitigation are set out in chapters 7 and 10 of the Environmental Statement [EN010106/APP/6.1].</p>
<p>A full archaeological evaluation needs to be undertaken</p>	<p>Following the conclusion of the statutory consultation, the Applicant has continued to carry out archaeological assessments including trial trenching. The outcomes of these assessments have resulted in revisions to the design of the Scheme. Areas for archaeological mitigation have been included within parcels W03, W04 (shown in Figure 3-2 of the ES [EN010106/APP/6.3]), and E33 (shown in Figure 3-1 of the ES [EN010106/APP/6.3]) in support for the conclusions of archaeological surveys carried out in the Order limits. The full results of the Applicant's assessments carried out in relation to heritage can be found in Chapter 7 of the Environmental Statement [EN010106/APP/6.1] submitted as part of the DCO application.</p>
<p>The rural landscape is historic in character and this will be impacted by the Scheme</p>	<p>A number of viewpoints were prepared as part of the Landscape and Visual Impact Assessment for the Environmental Statement [EN010106/APP/6.1]. The Applicant's DCO application documents include assessment of the Scheme's impacts on heritage assets through photomontages. These include views to and from of notable designated and non-designated archaeological and historic landscape assets. The photomontages can be found in the Environmental Statement Figures [EN010106/APP/6.3]. Appropriate screening has been developed and implemented to minimise the visual intrusion of the Scheme, while avoiding obscuring or intruding upon views and relationships between heritage assets. Any mitigation planting has taken into</p>

Matter raised	Regard had to comment by the Applicant
	consideration the surrounding landscape character and hedge planting has been favoured over tree planting where appropriate. Appropriate setbacks have also been incorporated into the scheme design, limiting visibility from key routes through the landscape.
The villages are historic in character and their setting will be impacted by the Scheme	The Applicant considers that the mitigation measures embedded in the Scheme's design are sufficient to mitigate impacts on identified heritage assets and the region's cultural heritage. The Applicant has continued to refine its Scheme proposals following the statutory consultation including its mitigation strategy for heritage assets. This has included ongoing engagement with Historic England and other interested stakeholders. The Applicant's assessments of the Scheme's impacts on heritage, and its proposed mitigation measures are set out in Chapter 7 of the Environmental Statement [EN010106/APP/6.1].

Transport and access

6.3.140 Key themes that were raised by community consultees included:

- a. The traffic from the Scheme will degenerate the condition of roads;
- b. The road infrastructure cannot cope with additional vehicles;
- c. The proposed access points for construction traffic to the Scheme are inappropriate;
- d. There are too many planned HGV movements during the construction and decommissioning phases;
- e. There are likely to be accidents as a result of increased traffic;
- f. Traffic will deposit mud and debris on the road infrastructure;
- g. The local area has already been disrupted by recent cabling works; and,
- h. Public walking amenity on roads will be reduced due to the introduction of heavy traffic.

6.3.141 Community consultees were keen to share local knowledge of the road network and perceived traffic implications of the Scheme on transport and access routes.

6.3.142 Respondents raised concern with the level of traffic proposed during the construction phase. This was recorded 143 times. It was additionally felt that the local rural road network would be unable to cope with the proposed traffic levels. This theme was raised 102 times. Many felt because of this there would be road surface damage, traffic congestion, and an increase in accidents. Herringswell Parish Council felt that the modelling of staff vehicles relied too heavily on car sharing.

6.3.143 It was also felt that more measures should be put in place to maintain the condition of the road infrastructure. Community consultees were concerned with potential mud and debris left on roads, potholes due to construction vehicles, and restoring condition of grass verges during and after construction.

6.3.144 Community consultees also raised the negative impacts of recent roadworks because of cabling work from Burwell to Lakenheath. This was raised 19 times, with respondents asking for more robust mitigation measures to be in place.

East Site A and B

6.3.145 Respondents were concerned about the blind junction needed to access East Site A as the primary access point.

6.3.146 Community consultees also raised the suitability of Elms Road as a secondary access point and raised there would be a need to move hedgerows to allow access. This was similarly raised by Herringswell Parish Council. Respondents felt that it was unsuitable for HGV traffic, as was the B1085. It was also felt that routes entering Worlington would be unsuitable.

6.3.147 Another route which community consultees highlighted was the Four Cross Bridge, which was stated as unsuitable to support the volume of the proposed traffic.

West Site A and B

6.3.148 Community consultees felt that the primary access point for West Site A was unsuitable due to its status as an unclassified country road. This was also raised for West Site B. It was felt that HGV traffic should avoid the Chippenham-Snailwell road and travelling through Snailwell.

6.3.149 Respondents also felt that the proposed entrance from the B1085 into Dane Hill Farm was unsuitable as it is located on a bend and will require usage of a rail bridge.

6.3.150 The primary access point for West Site A, via the Chippenham junction of the A11 was also felt to be unsuitable due to the narrow and rural nature of the road.

Applicant's response

6.3.151 The Applicant has had regard to all comments relating to transport and access in **Appendix J-3**. With regard to the matters raised at 6.3.140 above, the Applicant has set out its approach in **Table 6-50** below.

6.3.152 The Applicant has assessed the impact of transport as part of its Environmental Impact assessment. No significant impacts are anticipated on transport throughout the Scheme's lifetime, including on fear and intimidation as well as accidents and safety. A Transport Assessment has been included as Appendix 13B of the ES [EN/010106/APP/6.2].

6.3.153 The Applicant has embedded significant mitigation within Chapter 13 Transport and Access of the Environmental Statement [EN/010106/APP/6.1]. A Framework CTMP and Travel Plan (presented in Appendix 13C of the ES [EN/010106/APP/6.2]) has been published as part of the DCO application and contains further information regarding HGV management in Section 6 including HGV routing, which will be directed to use the Strategic Road Network and generally avoid using the local road network.

6.3.154 The Applicant is to carry out a highway condition survey before the start of works and is proposing to install a self-contained wheel wash per Site be used by vehicles prior to exiting the Site onto the public highway if there is mud or debris on the construction site. For loads unable to use the fixed wheel wash, a localised wheel washing would be set up to cater for these individually and as required to ensure no detrimental effect to the highway. This is outlined in the Framework CTMP and Travel Plan (presented in Appendix 13C of the ES [EN/010106/APP/6.2]) within our DCO application.

Table 6-50 Regard had to comments relating to transport and access received from Section 47 consultation

Matter raised	Regard had to comment by the Applicant
The traffic from the Scheme will degenerate the condition of roads	The Applicant is to carry out a highway condition survey before the start of works and is proposing to install a self-contained wheel wash per Site be used by vehicles prior to exiting the Site onto the public highway if there is mud or debris on the construction site. For loads unable to use the fixed wheel wash, a localised wheel washing would be set up to cater for these individually and as required to ensure no detrimental effect to the highway. This is outlined in the Framework CTMP and Travel Plan (presented in Appendix 13C of the ES [EN/010106/APP/6.2]) within our DCO application.
The road infrastructure cannot cope with additional vehicles	The Applicant has produced a Framework CTMP and Travel Plan (presented in Appendix 13C of the ES [EN/010106/APP/6.2]) as part of its DCO application. The plan has been designed to minimise vehicles associated with the construction of the Scheme travelling through villages and route instead seeks to focus construction traffic to the Strategic Road Network.
The proposed access points for	A review of the site accesses is included

Matter raised	Regard had to comment by the Applicant
construction traffic to the Scheme are inappropriate	within the Framework CTMP and Travel Plan (Appendix 13C of the ES) [EN/010106/APP/6.2] which includes swept path analysis, visibility splays, indicative site access layouts and HGV routes. All of the proposed accesses are suitable for their intended purposes.
There are too many planned HGV movements during the construction and decommissioning phases	<p>Traffic studies and models were used to inform the assessment presented in Chapter 13 of the ES [EN010106/APP/6.1] and the production of the Framework CTMP and Travel Plan (Appendix 13C) and Transport Assessment (Appendix 13B) have used existing traffic flows as the baseline. These existing traffic flows have therefore been taken into account in the transport assessment, which has concluded that there will be no significant effects during construction.</p> <p>The Applicant has submitted a Framework CTMP and Travel Plan (Appendix 13C) [EN/010106/APP/6.2] as part of its DCO application. The management plan will be adhered to by those travelling to and from the site. This will establish measures that will minimise the volume of HGV and staff traffic so far as reasonably practicable, and the impacts on the local community. HGVs will be routed away from local villages as far as possible and will make use of the strategic road network. The CTMP includes measures that will avoid arrival of vehicles associated with the construction of the Scheme throughout the day to minimise the impact on the local community by avoiding the highway network's peak hours. It is anticipated that the AM and PM Scheme peak hours will be 06:00-07:00 and 19:00-20:00. This reflects the arrival and departure times of the staff.</p>
There are likely to be accidents as a result of increased traffic	The Applicant has assessed the impact of transport as part of its Environmental Impact assessment. No significant impacts are anticipated on transport throughout the

Matter raised	Regard had to comment by the Applicant
	<p>Scheme's lifetime, including on fear and intimidation as well as accidents and safety. A Transport Assessment has been included as Appendix 13B of the Environmental Statement [EN/010106/APP/6.2]. The Applicant has embedded significant mitigation within Chapter 13 Transport and Access of the Environmental Statement [EN/010106/APP/6.1]. A Framework CTMP and Travel Plan (presented in Appendix 13C of the ES [EN/010106/APP/6.2]) has been published as part of the DCO application, and contains further information regarding HGV management in Section 6 including HGV routing, which will be directed to use the Strategic Road Network and generally avoid using the local road network.</p>
<p>Traffic will deposit mud and debris on the road infrastructure</p>	<p>The Applicant is proposing to install self-contained wheel washes to be used by vehicles prior to exiting the Site onto the public highway if there is mud or debris on the construction site. For loads unable to use the fixed wheel wash, a localised wheel washing would be set up to cater for these individually and as required to ensure no detrimental effect to the highway. This was outlined in Chapter 3: Scheme Description of the PEI Report and has also been included in Chapter 3 of the ES [EN/010106/APP/6.1], and the Framework CTMP and Travel Plan (presented in Appendix 13C of the ES [EN/010106/APP/6.2]) within the DCO application.</p>
<p>The local area has already been disrupted by recent cabling works</p>	<p>The Applicant has revised the design of the Sunnica Energy Farm following the Statutory consultation. An updated project description has been submitted as part of the DCO application. This is available in Chapter 3: Scheme description of the Environmental Statement [EN010106/APP/6.1]. The cable corridor has been directed across open countryside</p>

Matter raised	Regard had to comment by the Applicant
	and agricultural land. Where existing infrastructure such as roads and watercourses need crossing, trenchless techniques, such as boring, micro-tunnelling or moling methods will be undertaken where the EIA or design concludes the need for an alternative to open trenching to minimise disruption.
Public walking amenity on roads will be reduced due to the introduction of heavy traffic	The Applicant has assessed whether the Scheme will impact on vehicle and non-motorised travellers. The Scheme has been assessed to have no significant impact on accidents and safety for either group. This was outlined in Chapter 13: Transport and Access of the PEIR and has been included in Chapter 13 of the ES [EN/010106/APP/6.1]. The Framework CTMP and Travel Plan (presented in Appendix 13C of the ES) [EN/010106/APP/6.2] identifies traffic management measures to be used during construction of the Scheme.

Water resources

6.3.155 Key themes that were raised by community consultees included:

- a. Local rivers may be contaminated;
- b. Groundwater water resources will be contaminated;
- c. The area is unsuitable for solar development as it is liable to flood; and,
- d. The Scheme will affect the drainage of the area.

6.3.156 Most comments received regarding water resources were concerned about potential contamination of local rivers and groundwater resources. Concern was centred around the construction and decommissioning phases, as well as damage to solar panels or leaching during the operational phase.

6.3.157 Some community responses were concerned about the impact of soil compaction on water drainage, which could increase the flood risk of the area. Stansfield Parish Council raised that any impact on local watercourses could impact habitats.

Applicant's Response

6.3.158 The Applicant has had regard to all comments relating to water resources in **Appendix J-3**. With regard to the matters raised at 6.3.155 above, the Applicant has set out its approach in **Table 6-51** below.

6.3.159 The Scheme will have an Environmental Management Plan in place for the operation and maintenance of the Scheme. This will include measures to regulate environmental effects of the operational phase of the Site. The Framework OEMP is included in Appendix 16F of the ES [EN010106/APP/6.2]. The detailed Plan will include a regular schedule for visually inspecting the panels, ensuring that the structural integrity of the panels will be regularly observed.

6.3.160 The Applicant has embedded a range of mitigation measures within the Scheme design to reduce potential impacts on the water environment. This includes removing infrastructure from Flood Zone 3b areas and the implementation of swales/drainage ditches. A Flood Risk Assessment has been submitted as part of the ES at Appendix 9C [EN010106/APP/6.2].

Table 6-51 Regard had to comments relating to water resources received from Section 47 consultation

Matter raised	Regard had to comment by the Applicant
Local rivers may be contaminated	The Scheme will have an Environmental Management Plan in place for the operation and maintenance of the Scheme. This will include measures to regulate environmental effects of the operational phase of the Site. The Framework OEMP is included in Appendix 16F of the ES [EN010106/APP/6.2]. The detailed Plan will include a regular schedule for visually inspecting the panels, ensuring that the structural integrity of the panels will be regularly observed. The panels are constructed in a robust manner and their components cannot be separated except with a considerable mechanical load. Therefore, the risk of any liquid leakage from the panels is very low, especially in any large quantities. This is stated in Chapter 9 of the Environmental Statement [EN010106/APP/6.1]. The site will be secured by security measures, plus all the solar PV panels are offset by at least 10m from watercourses - as measured from the water's edge/edge of channel under normal flow conditions. All site drainage is directed through SuDS features, which provide water quality benefits.
Groundwater water resources will be contaminated	The potential effect on groundwater quality and Source Protection Zones was considered within the assessment for each

Matter raised	Regard had to comment by the Applicant
	<p>site as part of the Applicant's Environmental Impact Assessment. No significant effects are anticipated on groundwater, underground waterways or watercourses. The assessment findings are included within Chapter 9 of the Environmental Statement [EN/010106/APP/6.1]. Standard environmental protection measures will be implemented and adopted during construction, formalised through a CEMP. The Framework CEMP is presented in Appendix 16C of the Environmental Statement [EN/010106/APP/6.2]. These measures will include pollution prevention measures.</p>
<p>The area is unsuitable for solar development as it is liable to flood</p>	<p>The Applicant has embedded a range of mitigation measures within the Scheme design to reduce potential impacts on the water environment. This includes removing infrastructure from Flood Zone 3b areas and the implementation of swales/drainage ditches. A Flood Risk Assessment has been submitted as part of the Environmental Statement at Appendix 9C [EN010106/APP/6.2]. The FRA demonstrates that the Scheme does not increase flood risk within or surrounding the Scheme.</p>
<p>The Scheme will affect local drainage</p>	<p>Soil compacted during construction that is not being built on will be planted with native grassland, hedgerow or trees. This will improve aeration in the soil. Details on the planting and management of the habitat created are provided in Appendix 10I Outline Landscape and Ecology Management Plan of the ES [EN010106/APP/6.2].</p> <p>The Applicant has embedded a range of mitigation measures within the Scheme design to reduce potential impacts on the water environment. This includes removing infrastructure from Flood Zone 3b areas and the implementation of swales/drainage</p>

Matter raised	Regard had to comment by the Applicant
	ditches. A Flood Risk Assessment has been submitted as part of the Environmental Statement at Appendix 9C [EN010106/APP/6.2]. The FRA demonstrates that the Scheme does not increase flood risk within or surrounding the Scheme.

Human health

6.3.161 Key themes that were raised by community consultees included:

- a. Closure of PRoWs will affect residents' mental health and physical well-being;
- b. The Scheme will affect residents' mental health;
- c. The technology poses a fire risk for the local community, which will produce hazardous gases;
- d. The materials used are toxic;
- e. BESS units have been known to catch fire;
- f. Construction noise will reduce mental and physical health;
- g. The technology has not been tested on the scale proposed and may have unanticipated health impacts;
- h. The air quality of the local area will be reduced during construction;
- i. It is possible that the Scheme may be a target for terrorism, and,
- j. Electromagnetic radiation from the Scheme will be harmful to human health.

Air Quality

6.3.162 Health impacts from reductions in air quality because of the Scheme were raised 62 times. This was especially raised as an impact during the construction phase. Community respondents were concerned that dust and pollution from construction would adversely impact on residents with existing poor health. Concern that the Scheme would increase pollution in the area generally was recorded 35 times across the community feedback. Herringswell Parish Council felt that the PEI Report had not consider the effect on respiratory conditions.

Battery storage

6.3.163 Most respondents who raised health and safety concerns did so in relation to the proposed battery storage systems. Comments that the battery storage would have a negative impact on resident health and safety was raised 85 times across the community feedback received.

6.3.164 The CPRE also commented on the high risk of fire and explosion, and potential creation of toxic fumes. They requested Standard Operating Procedures be drafted. Risks of battery storage was raised by Herringswell Parish Council, Moulton Parish Council and Newmarket Town Council.

Major incidents

6.3.165 The health and safety of the battery energy storage systems were also discussed considering the potential fire risk of the units and the impact of a fire on the surrounding area. This was raised 185 times across community feedback. Due to the fire risk, consultees felt that the location of the BESS units should be moved further from residential areas. Many felt that the Battery Fire Safety Management Plan should have been available for review during the Statutory consultation.

6.3.166 Other responses also raised the suitability of the Scheme's proposed security measures to mitigate terrorist threats during the life of the farm.

Mental health

6.3.167 Community consultees raised the theme of mental health 48 times. This was most commonly due to the removal of green space in the area as a result of the Scheme, and stress caused by the proposed Scheme.

Physical health

6.3.168 Fifteen community comments felt that the Scheme would be harmful on physical health. This was due to the impact on closing footpaths, as well as other health concerns detailed above.

Applicant's response

6.3.169 The Applicant has had regard to all comments relating to human health in **Appendix J-3**. With regard to the matters raised at 6.3.161 above, the Applicant has set out its approach in **Table 6-52** below.

6.3.170 There is a potential fire risk associated with certain types of batteries such as lithium ion. The Applicant recognises how important it is to demonstrate that the BESS would be safe. The Applicant has embedded mitigation within the Scheme design and has included an Outline Battery Fire Safety Management Plan in its DCO application [EN010106/APP/7.6], that has been developed through consultation with the local planning authorities, the Suffolk Fire and Rescue Service (who have also responded on behalf of the Cambridgeshire Fire and Rescue Service) and has also been shared with the Health and Safety Executive.

6.3.171 The Unplanned Atmospheric Emissions from Battery Energy Storage Systems (BESS) provided in Appendix 16D of the Environmental Statement [EN010106/APP/6.2] has determined that even in the unlikely scenario that all the safety systems fail and a large scale fire breaks out within one of the BESS containers then the resultant hydrogen fluoride concentration at the closest receptors would be below the level that Public Health England has identified as resulting in notable discomfort to members of the general population.

6.3.172 User's access to open spaces has been considered in Chapter 15 Human Health of the Environmental Statement [EN010106/APP/6.1]. No significant effects were identified in this assessment.

6.3.173 In relation to any concerns on electromagnetic fields generated by electrical equipment, all items carrying some form of electrical voltage or current are subject to electric and magnetic fields. The impact upon human health of these fields was scoped out

of the Environmental Impact Assessment (EIA) in agreement with the Planning Inspectorate at the initial scoping stage undertaken in 2019. This was because it was considered that the proposed Scheme did not present any significant risk to human health through such fields. Public Health England was consulted at this stage and raised no concerns.

Table 6-52 Regard had to comments relating to human health received from Section 47 consultation

Matter raised	Regard had to comment by the Applicant
<p>Closure of PRoWs will affect residents' mental health and physical well-being</p>	<p>The Scheme will not permanently affect any PRoW during operation. In fact, new permissive routes are being created that will be open to the public to use throughout operation of the Scheme. These will open up access between existing PRoW. The human health assessment provided in Chapter 15 of the ES [EN010106/APP/6.1] has assessed the impact of these and access to open space, and concluded that this will provide a beneficial effect to human health during operation (not significant). The locations of these permissive routes to be created are shown in Figure 12-6 of the ES [EN010106/APP/6.3].</p> <p>During construction, some PRoW will need to be closed for up to 3 weeks each. Those that would need to be closed are shown in Figure 12-5 of the ES [EN010106/APP/6.3]. The effect of this disruption and reduced access on human health has been assessed in Chapter 15 of the ES [EN010106/APP/6.1], and an adverse effect (not significant) was concluded. The interactions of effects (i.e., intra-project cumulative effects) from the impacts on views and traffic increases on the health of local residents and recreational users of footpaths during construction has been assessed in Chapter 17 of the ES [EN010106/APP/6.1]. The effect interaction from landscape, visual and increased traffic has been assessed as not significant during construction. User's access to open spaces has been considered in Chapter 15 Human Health of the Environmental Statement [EN010106/APP/6.1]. No significant effects were identified in this</p>

Matter raised	Regard had to comment by the Applicant
	assessment.
<p>The Scheme will affect residents' mental health</p>	<p>Vegetation planting has been proposed throughout and around the Scheme as part of the design to enhance the landscape and screen views of the infrastructure. The design has taken the structure of the existing landscape into account. A Landscape and Visual Impact Assessment has been undertaken to assess the effects on landscape and visual receptors in the vicinity of the Scheme, such as residents, recreational users of PRow, motorists, etc. The conclusions of this assessment has been presented in Chapter 10 of the Environmental Statement [EN010106/APP/6.1]. There will be some significant effects on views and landscape setting during construction, operation and decommissioning. Significant effects identified during construction will be due to the presence of construction machinery and construction activities. Following construction, in year 1 of operation, a number of significant effects on views and landscape setting are likely to remain due to the presence of the infrastructure. However, once the vegetation planted for screening has matured (by year 15) these effects are anticipated to reduce to no effect.</p> <p>The Scheme will not permanently affect any PRow during operation. In fact, new permissive routes are being created that will be open to the public to use throughout operation of the Scheme. These will open up access between existing PRow. The human health assessment provided in Chapter 15 of the ES [EN010106/APP/6.1] has assessed the impact of these and access to open space, and concluded that this will provide a beneficial effect to human health during operation (not significant). The locations of these permissive routes to be created are shown in Figure 12-6 of the</p>

Matter raised	Regard had to comment by the Applicant
	<p>ES [EN010106/APP/6.3].</p> <p>During construction, some PRoW will need to be closed for up to 3 weeks each. Those that would need to be closed are shown in Figure 12-5 of the ES [EN010106/APP/6.3]. The effect of this disruption and reduced access on human health has been assessed in Chapter 15 of the ES [EN010106/APP/6.1], and an adverse effect (not significant) was concluded. The interactions of effects (i.e. intra-project cumulative effects) from the impacts on views and traffic increases on the health of local residents and recreational users of footpaths during construction has been assessed in Chapter 17 of the ES [EN010106/APP/6.1]. The effect interaction from landscape, visual and increased traffic has been assessed as not significant during construction. User's access to open spaces has been considered in Chapter 15 Human Health of the Environmental Statement [EN010106/APP/6.1]. No significant effects were identified in this assessment.</p>
<p>The technology poses a fire risk for the local community, which will produce hazardous gases</p>	<p>There is a potential fire risk associated with certain types of batteries such as lithium ion. The Applicant recognises how important it is to demonstrate that the BESS would be safe. The Applicant has embedded mitigation within the Scheme design and has included an Outline Battery Fire Safety Management Plan in its DCO application [EN010106/APP/7.6], that has been developed through consultation with the local planning authorities, the Suffolk Fire and Rescue Service (who have also responded on behalf of the Cambridgeshire Fire and Rescue Service) and has also been shared with the Health and Safety Executive. This outline plan sets out how the Scheme proposes to mitigate and manage the potential fire risk posed by the BESS. The batteries will be housed within containers. These containers may be</p>

Matter raised	Regard had to comment by the Applicant
	<p>modular and joined depending on equipment choice to be determined at detailed design stage. Each BESS container will be fitted within an automatic sprinkler or water mist system for fire suppression in the event of an unplanned fire. The water supply for this system will be integrated into the design of each BESS container and located either internally or externally (centralised or decentralised) to each BESS. The containment of this water would be within a sump integrated into the BESS container. Each BESS area requires water storage for use by fire fighters in case of a fire in the BESS compound.</p> <p>The Unplanned Atmospheric Emissions from Battery Energy Storage Systems (BESS) provided in Appendix 16D of the Environmental Statement [EN010106/APP/6.2] has determined that even in the unlikely scenario that all the safety systems fail and a large scale fire breaks out within one of the BESS containers then the resultant hydrogen fluoride concentration at the closest receptors would be below the level that Public Health England has identified as resulting in notable discomfort to members of the general population.</p>
The materials used are toxic	<p>As per Chapter 3, Scheme Description within the Environmental Statement [EN/010106/APP/6.1], the batteries will be housed in containers. This will ensure that any leakages will be contained and not result in contamination of the ground and groundwater. A fully functional solar PV panel is not toxic and does not present a danger to its surrounding environs. The Applicant does however recognise the potential for solar PV panels to be damaged and to leak. For this reason, the OEMP will include a regime of regular checks to identify and fix any damage prior to their being any leaks from the panels. The Plan will also set out precautions to be</p>

Matter raised	Regard had to comment by the Applicant
	<p>followed during maintenance activities to minimise the risk of any leaks. A Framework OEMP is provided at Appendix 16F of the ES [EN010106/APP/6.2].</p> <p>Best practice avoidance and mitigation measures for ground contamination are outlined in the Framework CEMP which is included under Appendix 16C of the Environmental Statement [EN010106/APP/6.2]. Monitoring will be implemented to determine that the objectives documented within Appendix 10I Outline LEMP [EN010106/APP/6.2] are being achieved. A post-construction monitoring programme will be formalised and agreed as part of the DCO submission and included within the finalised LEMP. The DCO consent will require the return of the land to its existing use.</p>
<p>BESS units have been known to catch fire</p>	<p>There is a potential fire risk associated with certain types of batteries such as lithium ion. The Applicant recognises how important it is to demonstrate that the BESS would be safe. The Applicant has embedded mitigation within the Scheme design and has included an Outline Battery Fire Safety Management Plan in its DCO application [EN010106/APP/7.6], that has been developed through consultation with the local planning authorities, the Suffolk Fire and Rescue Service (who have also responded on behalf of the Cambridgeshire Fire and Rescue Service) and has also been shared with the Health and Safety Executive. This outline plan sets out how the Scheme proposes to mitigate and manage the potential fire risk posed by the BESS.</p> <p>The Scheme design will include adequate separation and firewalls between battery banks to ensure that an isolated fire would not become widespread and lead to a major incident. The batteries will be housed within containers. These containers may be</p>

Matter raised	Regard had to comment by the Applicant
	<p>modular and joined depending on equipment choice to be determined at detailed design stage. Each BESS container will be fitted within an automatic sprinkler or water mist system for fire suppression in the event of an unplanned fire. The water supply for this system will be integrated into the design of each BESS container and located either internally or externally (centralised or decentralised) to each BESS. The containment of this water would be within a sump integrated into the BESS container. Each BESS area requires water storage for use by fire fighters in case of a fire in the BESS compound.</p> <p>Additionally, the Applicant has submitted an Unplanned Atmospheric Emissions from Battery Energy Storage Systems (BESS) Assessment Appendix 16D of the Environmental Statement [EN010106/APP/6.2]. The assessment has determined that even in the unlikely scenario that all the safety systems fail and a large scale fire breaks out within one of the BESS containers then the resultant hydrogen fluoride concentration at the closest receptors would be below the level that Public Health England has identified as resulting in notable discomfort to members of the general population.</p>
Construction noise will reduce mental and physical health	<p>The Applicant has conducted construction and operational noise modelling to assess the potential impacts on nearby receptors. Noise impacts from construction and operation are predicted to be not significant. Changes in noise due to construction traffic are predicted to result in a minor adverse effect at worst, which is not significant. The Applicant has included a Framework CEMP in Appendix 16C [EN010106/APP/6.2] and CTMP and Travel Plan in Appendix 13C [EN010106/APP/6.2] to manage potential impacts from noise and traffic during construction.</p>

Matter raised	Regard had to comment by the Applicant
	<p>During the operational phase some residents on Weirs Drove and Hythe Lane in Burwell, Cambridgeshire may experience some minor adverse effects from noise from the operational Burwell National Grid Substation Extension. Any tonal, impulsive or intermittent acoustic features will be carefully considered and specific noise control and mitigation measures will be included. This includes procuring equipment with lower (than modelled) sound power levels, silencers and/or acoustic barriers on equipment, and dynamic vibration absorbers and acoustic active cancelling for power transformers as necessary. These effects on human health are considered to be not significant.</p>
<p>The technology has not been tested on the scale proposed and may have unanticipated health impacts</p>	<p>The Scheme will utilise tried and tested technology, both in the solar PV arrays and battery energy storage systems (BESS).</p>
<p>The air quality of the local area will be reduced during construction</p>	<p>Chapter 14: Air Quality of the Environmental Statement [EN010106/APP/6.1] has shown that the impacts of construction on local air quality are not significant. The Applicant has outlined mitigation measures in the Framework CEMP [EN010106/APP/6.2] that it will implement to reduce impacts from dust following a Dust Risk Assessment. Specific mitigation measures for each construction phase activity were outlined in Table 14.8 in Chapter 14: Air Quality of the Environmental Statement [EN010106/APP/6.1].</p>
<p>It is possible that the Scheme may be a target for terrorism</p>	<p>The design includes security measures, including fencing, CCTV cameras and lighting in critical areas. These are outlined in Chapter 3 of the Environmental Statement [EN010106/APP/6.1] and will continue to be developed during the detailed design phase. The Scheme will not process or include large scale chemicals. The Scheme is not anticipated to have an</p>

Matter raised	Regard had to comment by the Applicant
	effect on the risk of a major accident occurring as a result of criminal damage through its lifetime. This is outlined in Chapter 16 of the Environmental Statement [EN010106/APP/6.1].
Electromagnetic radiation from the Scheme will be harmful to human health	In relation to any concerns on electromagnetic fields generated by electrical equipment, all items carrying some form of electrical voltage or current are subject to electric and magnetic fields. The impact upon human health of these fields was scoped out of the EIA in agreement with the Planning Inspectorate at the initial scoping stage undertaken in 2019. This was because it was considered that the proposed Scheme did not present any significant risk to human health through such fields. Public Health England was consulted at this stage and raised no concerns.

Renewable energy

6.3.174 Key themes that were raised by community consultees included:

- a. There is little mention of solar in the Government's Energy White Paper;
- b. The Scheme is not compatible with Government policy;
- c. Solar energy is not the most efficient form of renewable electricity generation;
- d. Alternative clean energy technologies are preferable to solar energy, such as wind power or nuclear power; and,
- e. The Scheme will not support UK manufacturing as the UK lacks capacity to produce solar energy infrastructure.

6.3.175 Some community consultees felt that other forms of renewable energy should be prioritised, with suggestions of wind turbines raised most often. Wind turbines were suggested 62 times, especially in the context of the Government's 10-point plan. Other renewable technologies, such as tidal and biogas technologies were also raised, as well as nuclear power. Alternative scales of solar development were also suggested, such as rooftops of industrial buildings (90 times), and on rooftops of new-build housing (18 times). Community consultees felt that more government legislation should be required to increase domestic solar PV.

6.3.176 Thirty-one community comments felt that the proposed Scheme was not compliant with current UK legislation or government strategy. This was discussed in relation to the Energy White Paper, as well as the UK Solar PV Strategy. Twenty-five

comments were recorded which stated that solar PV was not the most effective way to generate clean electricity.

Applicant's response

6.3.177 The Applicant has had regard to all comments relating to renewable energy in **Appendix J-3**. With regard to the matters raised at 6.3.174 above, the Applicant has set out its approach in **Table 6-53** below.

6.3.178 The Applicant has prepared a Planning Statement [EN010106/APP/7.2] to accompany the DCO application and this sets out the Scheme's compliance with the relevant policy framework considered to be important and relevant to the Secretary of State's decision. It concludes that the Scheme is overall policy compliant and that the need and benefits of the Scheme outweigh its limited adverse impacts. The Applicant has also prepared a Statement of Need [EN010106/APP/7.1] setting out the need for the Scheme in the context of the need for renewable energy generation more widely.

Table 6-53 Regard had to comments relating to renewable energy received from Section 47 consultation

Matter raised	Regard had to comment by the Applicant
There is little mention of solar in the Government's Energy White Paper	The Applicant is bringing forward the Scheme to meet an urgent national need for new, renewable, sources of electricity as set out by national planning and energy policy. The Applicant has submitted a Statement of Need [EN010106/APP/7.1] as part of the DCO application which explains the national need for the Scheme and considers the latest government energy white paper published in December 2020. It also considers the draft NPS EN-3 which provides express support for solar schemes.
The Scheme is not compatible with Government policy	The Applicant has prepared a Planning Statement [EN010106/APP/7.2] to accompany the DCO application and this sets out the Scheme's compliance with the relevant policy framework considered to be important and relevant to the Secretary of State's decision. It concludes that the Scheme is overall policy compliant and that the need and benefits of the Scheme outweigh its limited adverse impacts.
Solar energy is not the most efficient form of renewable electricity generation	Due to advances in technology, the power generated by solar plants is already at, or below, grid parity cost in the Great Britain.

Matter raised	Regard had to comment by the Applicant
	<p>For this reason, solar is economically attractive against other forms of traditional and renewable energy generation in the UK. Solar projects of the scale proposed by the Applicant are able to deliver large amounts of renewable electricity during the 2020s to meet the UK's legal requirement to decarbonise. Further information on this is provided within the Statement of Need [EN010106/APP/7.1] submitted as part of the DCO application.</p>
<p>Alternative clean energy technologies are preferable to solar energy, such as wind power or nuclear power</p>	<p>The Applicant is bringing forward the Sunnica Energy Farm to meet an urgent national need for new, renewable, sources of electricity. Further information on this is provided within the Statement of Need [EN010106/APP/7.1] submitted as part of the DCO application. The Applicant believes that there is a need for different types of renewable energy to come forward and that Sunnica Energy Farm complements wind energy and nuclear within the national energy mix that in turn promotes energy security. This is also consistent with the existing NPS EN-1.</p>
<p>The Scheme will not support UK manufacturing as the UK lacks capacity to produce solar energy infrastructure</p>	<p>The Applicant is bringing forward the Scheme to meet an urgent national need for new, renewable, sources of electricity. This need is established in the Overarching National Policy Statement (NPS) EN-1. Further information on this is provided within the Statement of Need [EN010106/APP/7.1] submitted as part of the DCO application. The Applicant does not therefore consider that the Scheme is inconsistent with the UK government's objectives, rather projects of this kind have an important role to play if the UK is to meet its legal requirement to decarbonise.</p> <p>The Applicant is committed to maximising the local economic benefits of the Sunnica Energy Farm and will source locally where possible. The Applicant has provided an Outline Skills, Supply Chain and</p>

Matter raised	Regard had to comment by the Applicant
	<p>Employment Plan [EN010106/APP/7.8], the implementation of which is secured by a requirement in Schedule 2 of the DCO. This identifies a number of opportunities to promote local business involvement in the Scheme, including through building relationships with local business groups and by adopting a procurement strategy that maximises purchasing from local businesses. It is the Applicant's view that future manufacturing of such components in the UK is enabled through greater expertise and the locating of new solar projects in the UK.</p>

Climate change

6.3.179 Key themes that were raised by community consultees included:

- a. More information is needed about the carbon footprint of the Scheme;
- b. The benefits of the Scheme will be outweighed by the Scheme's carbon footprint;
- c. The carbon footprint analysis should take into account embedded carbon in manufacturing materials, and decommissioning; and,
- d. The UK's carbon footprint will increase due to the loss of local food production.

6.3.180 The carbon footprint was discussed in relation to many aspects of the Scheme's lifetime, such as transportation and procurement of materials, manufacturing of the Scheme components and disposal of materials.

6.3.181 Community consultees requested 55 times that carbon footprint assessments should be made available in order to weigh up the costs and benefits of the Scheme.

6.3.182 CPRE requested that a Carbon Lifetime Analysis be detailed to prove the viability of the Scheme.

6.3.183 Suffolk Chamber of Commerce also highlighted the vulnerability of East Anglia to loss of land due to climate change.

Applicant's response

6.3.184 The Applicant has had regard to all comments relating to climate change in **Appendix J-3**. With regard to the matters raised at 6.3.179 above, the Applicant has set out its approach in **Table 6-54** below.

6.3.185 The Applicant has assessed the lifecycle greenhouse gas impact of the Scheme in Section 6.8 of Chapter 6 Climate Change of the ES [EN010106/APP/6.1], in

line with relevant industry guidance. The Scheme has been assessed to have a major beneficial effect on the climate.

Table 6-54 Regard had to comments relating to climate change received from Section 47 consultation

Matter raised	Regard had to comment by the Applicant
More information is needed about the carbon footprint of the Scheme	<p>The Applicant has assessed the lifecycle greenhouse gas impact of the Scheme. This identified and assessed Greenhouse Gas (GHG) emissions arising as a result of the Sunnica Energy Farm to determine the net lifecycle GHG impact. Based on the total energy generation and the lifecycle GHG emissions of 161,768 tCO₂e, the GHG intensity of the energy generated by the Scheme over its assessed lifetime is 6.87 grams of CO₂ equivalent per kWh (gCO₂e/kWh). This compares favourably with fossil fuel electricity generation and is comparable with other low carbon fuels. Table 6-16 within Chapter 6: Climate Change of the PEI Report outlines energy intensity ranges of alternative forms of energy generation. Further information can be found within Chapter 6: Climate Change of the Environmental Statement [EN010106/APP/6.1].</p>
The benefits of the Scheme will be outweighed by the Scheme's carbon footprint	<p>The lifecycle GHG impact assessment undertaken by the Applicant, as presented in Section 6.8 of Chapter 6 Climate Change of the Environmental Statement [EN010106/APP/6.1], considers all GHG emissions arising over the lifecycle of the Scheme (including construction, operation and decommissioning), and has been carried out in accordance with the Institute of Environmental Management and Assessment (IEMA) guidance for assessing GHG emissions within Environmental Impact Assessment. The Applicant is of the view that the development can be described as sustainable. The Scheme is answering an urgent national need for forms of low carbon, renewable energy generation. The GHG intensity of the Scheme compares</p>

Matter raised	Regard had to comment by the Applicant
	<p>favourably with the projected grid GHG intensity, as well as with alternative energy generation types, and it is estimated that an additional 1,118,041 tCO₂e would be emitted to generate the equivalent amount of electricity over the operational lifetime of the Scheme from the projected grid energy mix.</p>
<p>The carbon footprint analysis should take into account embedded carbon in manufacturing materials, and decommissioning</p>	<p>The Applicant has assessed the lifecycle greenhouse gas impact of the Scheme in Section 6.8 of Chapter 6 Climate Change of the Environmental Statement [EN010106/APP/6.1], in line with relevant industry guidance. The Scheme has been assessed to have a major beneficial effect on the climate. The Applicant has assessed the lifecycle greenhouse gas impact of the Sunnica Energy Farm. This identified and assessed GHG emissions arising as a result of the Sunnica Energy Farm to determine the net lifecycle GHG impact. This included procurement of materials and the impact of construction and decommissioning. During construction, a minor adverse effect on the global climate is anticipated. During operation, the Scheme has been assessed to have a major beneficial effect on the climate.</p> <p>Land use change as a result of the Scheme is anticipated to have a beneficial GHG impact of around 100,000 tonnes carbon dioxide equivalent (tCO₂e), largely due to the conversion of large areas of cropland to grassland, which has a higher carbon sequestration value than cropland. However, it is assumed that the new areas of grassland will be returned to cropland following decommissioning of the Scheme. The beneficial GHG impact from land use change is therefore considered to only be temporary (approximately 40 years) and has therefore been excluded from the lifecycle GHG impact assessment presented in Chapter 6 of the ES [EN010106/APP/6.1]. This is considered to</p>

Matter raised	Regard had to comment by the Applicant
	<p>be a robust worst-case approach and likely to underestimate the beneficial effect of the scheme, as it is expected that tree planting will be retained after decommissioning.</p> <p>For more information on the assumptions made and the scope of the assessment, please refer to Section 6.3 and Section 6.4 of Chapter 6 Climate Change of the Environmental Statement [EN010106/APP/6.1].</p>
<p>The UK's carbon footprint will increase due to the loss of local food production</p>	<p>The Applicant has assessed the lifecycle greenhouse gas impact of the Scheme in Section 6.8 of Chapter 6 Climate Change of the Environmental Statement [EN010106/APP/6.1], in line with relevant industry guidance. The Scheme has been assessed to have a major beneficial effect on the climate.</p> <p>The existing baseline in terms of carbon emissions from the Sites is not currently zero. Some of the crops grown on the agricultural land within the Order limits are currently exported internationally. The conversion of the land from arable crops, which are harvested yearly, to solar panels and native habitat planting (on 30% of the Scheme area) for 40 years, will result in a net saving in carbon dioxide alone, without accounting for the carbon saved through the renewable energy generation. Land use change as a result of the Scheme is anticipated to have a beneficial GHG impact of around 100,000 tonnes carbon dioxide equivalent (tCO₂e), largely due to the conversion of large areas of cropland to grassland, which has a higher carbon sequestration value than cropland. However, to ensure a robust assessment that assesses the worst case, it has been assumed that the existing greenhouse gas emissions associated with the Sites are zero. The amount of carbon used on importing food has not been calculated as it is not necessarily a true assumption that</p>

Matter raised	Regard had to comment by the Applicant
	<p>the construction of the Scheme would result in the need to import more food.</p> <p>The Applicant has undertaken an assessment of the agricultural land classification of the land within the Scheme. In line with the requirements of NPS EN-1, the Applicant has sought to avoid using agricultural land considered to be 'best and most versatile' (grades 1, 2 and 3a). Based on our assessments, the majority of the land (96.2%) proposed for use within the Sites is classed as not being 'best and most versatile and is predominantly grades 3b and 4. The proposed Sunnica Energy Farm will rest the land for a period of time and provide a much-needed new source of renewable energy generation. Full details of this assessment can be found in Chapter 12 of the Environmental Statement [EN010106/APP/6.1].</p>

Consultation process

6.3.186 Key themes that were raised by community consultees included:

- a. The consultation process has been inadequate;
- b. The local community is unaware that the consultation took place;
- c. The consultation did not allow for face-to-face contact and was conducted entirely online;
- d. The consultation should have been delayed due to the impact of the COVID-19 pandemic;
- e. Residents of Isleham were not aware that the Scheme would impact them until the statutory consultation and did not have an initial consultation;
- f. The Applicant is taking advantage of the COVID-19 pandemic to push through the application with limited resistance;
- g. The online format of the consultation is discriminatory to older residents who cannot access the technology;
- h. The Applicant will not have regard to responses received during the consultation;
- i. Independent assessment of consultation feedback is needed to ensure feedback is represented appropriately;

- j. The consultation booklet did not contain enough information for residents to be informed about the Scheme;
- k. The maps in the consultation booklet were too small; and,
- l. It took too long to receive answers to questions submitted during the statutory consultation.

6.3.187 Some consultees expressed concern that consultation had taken place at a time when rules on COVID-19 meant that in-person engagement could not take place, with a number arguing this was a deliberate attempt by the Applicant to avoid holding public meetings. This was raised 100 times throughout community responses. Herringswell Parish Council felt that the pandemic had impacted the adequacy of the consultation undertaken.

6.3.188 Objections to the online format of webinars held as part of the consultation were recorded 72 times. Those who did feel that the online nature of the consultations would be discriminatory to the older demographic in the area, as well as raising issues with the webinars provided. Comments regarding the webinars stated that the format did not allow for effective dialogue and were difficult to participate in due to the timing. Some respondents felt that questions were not asked and should have been facilitated more independently.

6.3.189 The changes to the red line boundary between the non-statutory and statutory consultation were also highlighted, particularly in reference to Isleham. The perception that Isleham had not been consulted properly considering the subsequent changes made was recorded 38 times.

6.3.190 Concern that consultation feedback would not be paid due regard by the Applicant was raised 34 times. Some felt that the consultation feedback received during the statutory consultation would not be represented authentically and would be distorted.

Consultation materials

6.3.191 General comments that requested more information about the Scheme were recorded 135 times. Fifty-four of these were in answers to Question 3b, which asked for views on the decommissioning process.

6.3.192 Some respondents felt that the consultation booklet was inadequate, and the maps of the Scheme were too small to assess the potential impacts of the Scheme. Community consultees also felt that the mail-drop area should be widened, and that communications received by residents may have been mistaken for advertising material. These points were also raised by Herringswell Parish Council.

Applicant's response

6.3.193 The Applicant has had regard to all comments relating to the consultation process in **Appendix J-3**. With regard to the matters raised at 6.3.186 above, the Applicant has set out its approach in **Table 6-55** below.

Table 6-55 Regard had to comments relating to the consultation process received from Section 47 consultation

Matter raised	Regard had to comment by the Applicant
The consultation process has been inadequate	The Applicant received a higher level of response to the consultation than the non-statutory consultation. The Applicant received a significant volume of feedback during the statutory consultation. This included 725 individual responses from the community.
The local community is unaware that the consultation took place	<p>The Applicant received a higher level of response to the consultation than the non-statutory consultation. The Applicant received a significant volume of feedback during the statutory consultation. This included 725 individual responses from the community.</p> <p>The Applicant considers that distributing the booklet (Appendix G-4), questionnaire (Appendix G-2) and pre-addressed Freepost envelope to addresses in Consultation Zone 1 was an effective means of enabling people in the local area to respond to the consultation. This was supplemented by advertising through local media outlets.</p>
The consultation did not allow for face-to-face contact and was conducted entirely online	<p>The Applicant considered whether it would be possible to hold physical public exhibitions in developing its Statement of Community Consultation. Public exhibitions were included in the Applicant's non-statutory consultation in 2019. It was not possible to arrange physical public exhibitions in a way that was compatible with Government guidance regarding COVID-19. The Statement of Community Consultation set out a consultation programme designed to allow people from across the community to respond in a way that complied with Government requirements in relation to COVID-19. This is set out in Chapter 4 of this Report.</p> <p>The Applicant received a significant volume of feedback during the statutory consultation including 725 individual</p>

Matter raised	Regard had to comment by the Applicant
	<p>responses from the local community. This confirms that the consultation reached a wide audience and attracted a significant level of participation.</p>
<p>The consultation should have been delayed due to the impact of the COVID-19 pandemic</p>	<p>The Statement of Community Consultation included a consultation period significantly longer than the statutory minimum of 28 days and this was developed in consultation with the host local authorities. The Applicant also extended the consultation period by two weeks, in part in view of the enhanced public health measures relating to the COVID-19 pandemic adopted by the Government at a national level from 5 November 2020 until 2 December 2020.</p> <p>The Applicant is bringing forward the proposals to meet an urgent, national need for new renewable sources of electricity. Further information on this is provided within the Statement of Need [EN010106/APP/7.1] submitted as part of the DCO application. The Government has encouraged the development sector to continue to work during the COVID-19 pandemic to provide the future infrastructure that we all need. The Applicant received a significant volume of feedback during the consultation which included 725 individual responses from the community. Based upon the quantity and detail of the responses that is received, the Applicant therefore considers that it was appropriate to consult at the time that it did.</p>
<p>The online format of the consultation is discriminatory to older residents who cannot access the technology</p>	<p>The Applicant recognises that some people may prefer not to engage through the webinars. The Applicant has offered the opportunity for people to have a one-to-one telephone conversation with the project team about specific issues of interest. The Applicant's dedicated freephone contact details was published in the consultation materials. The Applicant</p>

Matter raised	Regard had to comment by the Applicant
	<p>has not undertaken 'cold calls' as part of the consultation. Analysis of the consultation responses does not support the allegation that older members of the community were not able to participate in the consultation. For example, 52% of those who indicated their age in their feedback were over the age of 60.</p>
<p>The Applicant will not have regard to responses received during the consultation</p>	<p>The Applicant has had regard to the feedback received and has demonstrated this, in detail, in Chapter 6 of the Consultation Report. The Applicant is proposing changes to its proposals as submitted including:</p> <ul style="list-style-type: none"> a. Further setting the Scheme back from settlements, including Freckenham and Worlington; b. Adding additional areas for ecological mitigation, including areas for stone curlew to the south of Worlington; c. Proposing revised permissive routes to improve connectivity during the Scheme's operating life; and, d. Providing additional detail on the process through which the Scheme sites were identified in Chapter 4: Alternatives and design evolution of the Environmental Statement [EN010106/APP/6.1]
<p>Independent assessment of consultation feedback is needed to ensure feedback is represented appropriately</p>	<p>Feedback received by the Applicant has been impartially presented. The feedback has been reported in detail in this Consultation Report which is provided to the Planning Inspectorate with the application. The Consultation Report will be made available on the Planning Inspectorate's website if the application is accepted for examination, and it will then be able to be viewed by the public, as well as being available for the Examining</p>

Matter raised	Regard had to comment by the Applicant
	<p>Authority and the Secretary of State to view. The Planning Inspectorate may also request to see copies of the feedback received by the Applicant.</p>
<p>The consultation booklet did not contain enough information for residents to be informed about the Scheme</p>	<p>The Applicant has provided a range of formats for people to consult on, including a consultation booklet and virtual exhibition (Appendix G-4), as well as making the full PEI Report available. The Applicant provided several ways for people to find out more information including webinars with online Q&A sessions, telephone surgeries and including email, post and freephone contact details in consultation materials. Details of how to book a telephone appointment were included in the consultation booklet sent to residents within Consultation Zone 1 by post and in advertising in print media. It was possible to register for an appointment by phone only and the Applicant made a range of appointment times available.</p>
<p>The maps in the consultation booklet were too small</p>	<p>The maps included in the consultation booklet (Appendix G-4) were available for download from the Applicant's website. These allowed the user to zoom in on specific points on the map. The Applicant recognises that not everyone can easily read the maps when presented at A4 or smaller and were happy to make A3 copies of the maps available on request. Contact details to request these were included within the consultation booklet and were published in print media.</p>
<p>It took too long to receive answers to questions submitted during the statutory consultation</p>	<p>The Applicant has sought to provide detailed, helpful answers to enquiries raised by the community. This included signposting where additional information could be accessed within the PEI Report. The Applicant responded to all enquiries that it received ahead of the statutory consultation closing.</p>

Other

6.3.194 There were a number of comments made which did not fall into the categories above. These included:

- a. There is little information about the Applicant or the Directors of the Applicant available;
- b. Financial records on Companies House show that the Applicant has a negative bank balance;
- c. The Applicant is not a transparent company;
- d. The Applicant plans to sell the project upon achieving consent;
- e. There are no community benefits from the Scheme, and,
- f. Materials used in the Scheme's infrastructure will not be ethically sourced.

Applicant's response

6.3.195 The Applicant has had regard to all comments relating to other topics in **Appendix J-3**. With regard to the matters raised at 6.3.194 above, the Applicant has set out its approach in **Table 6-56** below.

Table 6-56 Regard had to other comments received from Section 47 consultation

Matter raised	Regard had to comment by the Applicant
There is little information about the Applicant or the Directors of the Applicant available	The Applicant does not believe that it is appropriate or relevant to enable meaningful statutory consultation to discuss individual Sunnica Limited Directors and other current, historical Directorships. Sunnica Limited is registered at Companies House under company number 08826077. The company has submitted all relevant documents as required to date. The Applicant has included a Funding Statement as part of the DCO application to demonstrate how it will meet liabilities incurred. Further details regarding the funding of the Sunnica Energy Farm can be found within the Funding Statement [EN010106/APP/4.2] submitted as part of the DCO application.
Financial records on Companies House show that the Applicant has a negative bank balance	The Applicant has included a Funding Statement as part of the DCO application to demonstrate how it will meet liabilities incurred. Further details regarding the funding of the Sunnica Energy Farm can be found within the Funding Statement [EN010106/APP/4.2] submitted as part of

Matter raised	Regard had to comment by the Applicant
	the DCO application.
The Applicant is not a transparent company	<p>Sunnica Limited is registered at Companies House under company number 08826077. The company has submitted all relevant documents as required to date. The Applicant has included a Funding Statement as part of the DCO application to demonstrate it will meet liabilities incurred. Further details regarding the funding of the Sunnica Energy Farm can be found within the Funding Statement [EN010106/APP/4.2] submitted as part of the DCO application.</p>
The Applicant plans to sell the project upon achieving consent	<p>If granted, the DCO would be for the benefit of Sunnica only (except for works in relation to the connection into the substation, for which National Grid would have the benefit), and the DCO would set out the specific circumstances in which the benefit (and the obligations) of the DCO could be transferred to another party. In most cases, the Secretary of State's consent would be required for such a transfer, and in all cases the party to whom the benefit of the DCO is transferred would be bound by the obligations and requirements contained within the DCO. A copy of the draft DCO [EN010106/APP/3.1] can be found within the DCO application documents.</p> <p>The DCO will require that the Scheme is operated and maintained in line with the Operational Environmental Management Plan and that requirement will be enforceable through the Planning Act 2008 against the person with the benefit of the Order at that time. A Framework Operational Environmental Management Plan (OEMP) has been prepared and is presented in Appendix 16F of the Environmental Statement [EN010106/APP/6.2] which provides the outline mitigation measures to be adhered</p>

Matter raised	Regard had to comment by the Applicant
	to during operation.
There are no community benefits from the Scheme	<p>The Applicant disagrees with the assessment that the proposed Sunnica Energy Farm does not provide direct benefits to the local community. This includes employment opportunities during both construction and operations, and a dedicated skills programme to identify opportunities for individuals to access employment. Further information can be found in the Skills, Supply Chain and Employment Strategy, the implementation of which is secured by a requirement in Schedule 2 of the DCO.</p> <p>The Applicant has had regard to feedback received through the statutory consultation which identifies local businesses and opportunities to promote local skills development. Further information is available in the Skills, Supply Chain and Employment Strategy, the implementation of which is secured by a requirement in Schedule 2 of the DCO. The benefit to the local community is assessed within Chapter 12: Socio-Economics and Land Use of the Environmental Statement [EN010106/APP/6.1]. The wider benefits derived from the Sunnica Energy Farm are set out within the Planning Statement [EN010106/APP/7.2].</p>
Materials used in the Scheme's infrastructure will not be ethically sourced	The Applicant recognises that there are risks connected to UK businesses and supply chains and will comply with all legal obligations regarding modern slavery.

6.4 Additional Section 47 (s47) with Parish Councils

6.4.1 As described in section 4.8 of this document, the Applicant identified a number of parish councils within consultation zone 2 that had not been consulted during the community consultation as outlined within the SoCC. The Applicant subsequently wrote to these parish councils to seek their views.

6.4.2 The Applicant received substantive comments from nine parish councils:

- | | |
|---------------------------------------|--|
| a. Alpheton Parish Council; | g. Parish Council of Offord Dary and Offord Cluny; |
| b. Croydon Parish Council; | h. Shadingfield, Sotterley, Willingham St Mary, & Ellough Joint Parish Council; and, |
| c. Denham Parish Council; | i. Somersham Parish Council. |
| d. Flowton Parish Meeting; | |
| e. Great Waldingfield Parish Council; | |
| f. Lolworth Parish Meeting; | |

6.4.3 The topics raised by these consultees included:

- a) The Applicant should not have carried out the statutory consultation during the pandemic;
- b) Need to ensure the site is maintained during the operational phase;
- c) Concern at loss of agricultural land and jobs as a result;
- d) The Scheme will have a negative impact on the landscape;
- e) The construction and decommissioning phases will be disruptive;
- f) Development will have a negative impact on local habitats;
- g) The scale of the Scheme is too big;
- h) The BESS units will need to be screened;
- i) The development will have a negative impact on users of public rights of way;
- j) Concern for road safety on narrow roads during construction and decommissioning phases;
- k) The Scheme is too close to and surrounds nearby villages;
- l) More information should be given on the expected output;
- m) There should be a condition to return the landscape to its original condition;
- n) Concern that noise will be detrimental for nearby residents;
- o) Potential for increased rainwater run-off which may increase flood risk; and,
- p) The grid connection is too far from the proposed sites.

- 6.4.4 The Applicant has had regard to all comments received from section 47 consultation in **Appendix J-3**. With regard to the matters raised in 6.4.3 above, the Applicant has set out its approach in **Table 6-57** below.

Table 6-57 Regard had to comments received from additional Section 47 consultation

Matter raised	Regard had to comment by the Applicant
<p>The Applicant should not have carried out the statutory consultation during the pandemic.</p>	<p>The Applicant received a higher level of response to the consultation than the non-statutory consultation. The Statement of Community Consultation included a consultation period significantly longer than the statutory minimum of 28 days and this was developed in consultation with the host local authorities. The Applicant also extended the consultation period by two weeks, in part in view of the enhanced public health measures relating to the COVID-19 pandemic adopted by the Government at a national level from 5 November 2020 until 2 December 2020.</p> <p>The Applicant has consulted in a way that meets its obligations set out in the SoCC. The Applicant has provided a range of formats for people to consult on, including a consultation booklet and virtual exhibition (Appendix G-4), as well as making the full PEI Report available. The Applicant provided several ways for people to find out more information including webinars with online Q&A sessions, telephone surgeries and including email, post and freephone contact details in consultation materials.</p> <p>The Applicant received a significant volume of feedback during the statutory consultation including 725 individual responses from the local community. This confirms that the consultation reached a wide audience and attracted a high level of participation.</p>
<p>Need to ensure the site is maintained</p>	<p>The Applicant has prepared an Outline</p>

Matter raised	Regard had to comment by the Applicant
during the operational phase.	LEMP (Appendix 10I) and Framework OEMP (Appendix 16F) submitted as part of the ES [EN010106/APP/6.2]) will be secured through the DCO. This will be developed at detail design (subject to approval of the Scheme) and that will set out the detailed measures for management and will be agreed with the host authorities.
Concern at loss of agricultural land and jobs as a result.	<p>The Applicant has undertaken an assessment of the land used for the Scheme. In line with the requirements of the NPPF, the Applicant has sought to avoid using agricultural land considered to be 'best and most versatile' (grades 1, 2 and 3a). Details of this assessment can be found in Appendix 12B Soils and Agriculture Baseline Report of the Environmental Statement [EN010106/APP/6.2].</p> <p>The Applicant has assessed that there will be no net employment loss as a result of the Scheme. There may be some temporary jobs which will not be offered, which is estimated to be two temporary jobs related to agricultural activities (considered equivalent to one permanent job). See Chapter 12 of the Environmental Statement [EN010106/APP/6.1] for further information.</p>
The Scheme will have a negative impact on the landscape.	<p>A suite of specialist reports have been undertaken by the Applicant to assess the potential impacts resulting from the Scheme. These include a full landscape and visual impact assessment alongside a landscape character assessment that have been undertaken regarding the Scheme. Full details of each of these assessments can be found in the Environmental Statement [EN010106/APP/6.1].</p> <p>Taking into account the feedback from</p>

Matter raised	Regard had to comment by the Applicant
	<p>the PEIR and the results of the specialist surveys and studies a suite of landscape mitigation measures and design changes have been proposed to mitigate the impacts of the Scheme. This has included the removal of some areas previously suggested for solar use; the addition of 'set back' areas from field edges closest to human receptors and the introduction of a large amount of tree and grassland planting.</p>
<p>The construction and decommissioning phases will be disruptive.</p>	<p>Construction working hours on the Sunnica Energy Farm will run from Monday-Saturday 7am-7pm. Where on-site works are conducted outside of core working hours they will comply with restrictions outlined in the Appendix 16C Framework CEMP of the Environmental Statement [EN010106/APP/6.2]. and any other restrictions agreed with relevant planning authorities. The Applicant recognises that construction can be disruptive and will adopt the Considerate Constructors Scheme to assist in reducing pollution and nuisance from the Scheme. The Applicant will employ best practice measures which go beyond statutory compliance. Precautionary working methods will be implemented to minimise potential adverse effects during construction across the entire Scheme. This will be outlined in the Appendix 16C Framework CEMP of the Environmental Statement [EN010106/APP/6.2].</p> <p>The effects of decommissioning are similar to, or often of a lesser magnitude, than construction effects. However, there can be a high degree of uncertainty at this point in time regarding decommissioning as engineering approaches and</p>

Matter raised	Regard had to comment by the Applicant
	<p>technologies are likely to change over the operational life of the proposed Sunnica Energy Farm. For the purposes of the Applicant's environmental impact assessment (EIA) activity it is assumed that the same timescales required for constructing the project will be needed to carry out the activities required to remove the infrastructure from the site. For assessments, the Applicant assumes the maximum impact in order to assess whether mitigation is required. A DEMP will be prepared outlining how this will be achieved prior to the start of decommissioning works. Further details of the Framework DEMP submitted with the DCO application can be viewed at Appendix 16E: Framework DEMP of the Environmental Statement [EN010106/APP/6.2].</p>
<p>Development will have a negative impact on local habitats.</p>	<p>Existing woodland and boundary features such as hedgerows will be retained. A variety of habitat types will be created as part of the Scheme in order to (i) improve the existing habitat for species present within the area, (ii) increase the area of improved habitat to increase ranges of species already present, and (iii) increase the biodiversity and species richness of the area. By creating new and enhancing existing habitats, this will help to create a more complex ecosystem which in turn will improve the stability of the populations of species within the Site and those 'spilling in' from the surrounding areas. Appendix 10I Outline LEMP [EN010106/APP/6.2] details how this will be achieved.</p>
<p>The scale of the Scheme is too big.</p>	<p>There is a direct correlation between the amount of land required and the level of energy the Applicant would be able to produce if granted consent. This in turn has an impact on the contribution that</p>

Matter raised	Regard had to comment by the Applicant
	<p>the Sunnica Energy Farm can make to the country's energy needs. The Applicant is bringing forward the Sunnica Energy Farm to meet an urgent national need for new, renewable, sources of electricity. Further information on this is provided within the Statement of Need [EN010106/APP/7.1] submitted as part of the DCO application.</p>
<p>The BESS units will need to be screened.</p>	<p>The LVIA, as set out in Chapter 10 of the Environmental Statement [EN010106/APP/6.1], acknowledges that the BESS will result in adverse visual effects once implemented. This has informed the Scheme design, with new areas of proposed tree planting around the BESS, so as to reduce the visual impact of the BESS. In addition, the colour tone of the BESS would be sympathetic to the colour tones of the landscape, so as to better integrate the BESS within the landscape.</p>
<p>The development will have a negative impact on users of public rights of way.</p>	<p>Vegetation planting has been proposed throughout and around the Scheme as part of the design to enhance the landscape and screen views of the infrastructure. The design has taken the structure of the existing landscape into account. An LVIA has been undertaken to assess the effects on landscape and visual receptors in the vicinity of the Scheme, such as residents, recreational users of PRow, motorists, etc. The conclusions of this assessment has been presented in Chapter 10 of the Environmental Statement [EN010106/APP/6.1]. There will be some significant effects on views and landscape setting during construction, operation and decommissioning. Significant effects identified during construction will be due to the presence of construction machinery and</p>

Matter raised	Regard had to comment by the Applicant
	<p>construction activities. Following construction, in year 1 of operation, a number of significant effects on views and landscape setting are likely to remain due to the presence of the infrastructure. However, once the vegetation planted for screening has matured (by year 15) these effects are anticipated to reduce to no effect.</p> <p>The Scheme will not permanently affect any PRow during operation. In fact, new permissive routes are being created that will be open to the public to use throughout operation of the Scheme. These will open up access between existing PRow. The human health assessment provided in Chapter 15 of the ES [EN010106/APP/6.1] has assessed the impact of these and access to open space, and concluded that this will provide a beneficial effect to human health during operation (not significant). The locations of these permissive routes to be created are shown in Figure 12-6 of the ES [EN010106/APP/6.3].</p> <p>During construction, some PRow will need to be closed for up to 3 weeks each. Those that would need to be closed are shown in Figure 12-5 of the ES [EN010106/APP/6.3]. The effect of this disruption and reduced access on human health has been assessed in Chapter 15 of the ES [EN010106/APP/6.1], and an adverse effect (not significant) was concluded. The interactions of effects (i.e. intra-project cumulative effects) from the impacts on views and traffic increases on the health of local residents and recreational users of footpaths during construction has been assessed in Chapter 17 of the ES [EN010106/APP/6.1]. The effect interaction from landscape, visual and</p>

Matter raised	Regard had to comment by the Applicant
	<p>increased traffic has been assessed as not significant during construction. User's access to open spaces has been considered in Chapter 15 Human Health of the Environmental Statement [EN010106/APP/6.1]. No significant effects were identified in this assessment.</p>
<p>Concern for road safety on narrow roads during construction and decommissioning phases</p>	<p>The Applicant has submitted a Framework CTMP and Travel Plan (Appendix 13C) [EN/010106/APP/6.2] as part of its DCO application. The management plan will be adhered to by those travelling to and from the site. This will establish measures that will minimise the volume of HGV and staff traffic so far as reasonably practicable, and the impacts on the local community. HGVs will be routed away from local villages as far as possible and will make use of the strategic road network.</p> <p>The effects of decommissioning are similar to, or often of a lesser magnitude, than construction effects. However, there can be a high degree of uncertainty at this point in time regarding decommissioning as engineering approaches and technologies are likely to change over the operational life of the proposed Sunnica Energy Farm. For the purposes of the Applicant's EIA activity it is assumed that the same timescales required for constructing the project will be needed to carry out the activities required to remove the infrastructure from the site. For assessments, the Applicant assumes the maximum impact in order to assess whether mitigation is required. A DEMP will be prepared outlining how this will be achieved prior to the start of decommissioning works. Further details of the Framework DEMP submitted with the DCO application can be viewed at</p>

Matter raised	Regard had to comment by the Applicant
	Appendix 16E: Framework DEMP of the Environmental Statement [EN010106/APP/6.2].
The Scheme is too close to and surrounds nearby villages.	<p>The Applicant has revised the design of the proposed Sunnica Energy Farm following the statutory consultation. The areas where the solar PV panels and associated infrastructure can be located in Sunnica East Site A and B has been reduced This will set the areas where the solar PV panels and associated infrastructure can be located s back from Isleham and Worlington. Parcels E07, E11, and E23 are no longer proposed to be built on. In addition to this, Battery Energy Storage System (BESS) at E33 will be set further back from Ferry Lane. The areas where the solar PV panels and associated infrastructure can be located in Sunnica West Site A and Site B has also been reduced in size. This will set the project back from residential dwellings in the area. W13, W14 and W16 have been removed from the Scheme, and large areas of W03 and W04 are not proposed for solar development. Additional landscaping has been proposed at parcels W10, W11, and W15. Extensive treatments on the eastern boundary of W15 will help mitigate impact on Kennett Garden Village. Taken together, and with the design changes made by the Applicant following the non-statutory consultation, the Applicant considers that the visibility of the solar panels will be reduced by the distance from the villages, the intervening vegetation and the proposed planting. The layout of the Scheme, including the parcels referenced, is shown in figures 3-1 and 3-2 (parameter plans) of the ES [EN010106/APP/6.3]. The Applicant notes that a number of comments relate to the parameter plans</p>

Matter raised	Regard had to comment by the Applicant
	presented in the PEI Report and therefore references these in its response.
More information should be given on the expected output.	The Applicant recognises that at the non-statutory consultation stage a figure of up to 500MW for the grid connection capacity was consulted upon. The output of the Sunnica Energy Farm in terms of installed power capacity will be determined post consent once the final design has been completed. The Applicant has revised the design of the Sunnica Energy Farm following the non-Statutory and further following the Statutory consultation. An updated project description has been submitted as part of the DCO application. This is available in Chapter 3: Scheme description of the Environmental Statement [EN010106/APP/6.1].
There should be a condition to return the landscape to its original condition.	The DCO will require that the Scheme is decommissioned after 40 years of operation, and that requirement will be enforceable through the Planning Act 2008 against the person with the benefit of the Order at that time. The DCO will also require the decommissioning of the Scheme in accordance with a DEMP. A Framework DEMP has been prepared and is presented in Appendix 16E of the Environmental Statement [EN010106/APP/6.2] which provides the outline mitigation measures to be adhered to during decommissioning. The DCO includes a requirement in Schedule 2 requiring the preparation and approval of the DEMP substantially in accordance with the Framework DEMP, and for the approved DEMP to be implemented. That requirement is also enforceable via the Planning Act 2008. In light of this, the Applicant does not consider there is a need for any

Matter raised	Regard had to comment by the Applicant
	additional measures to be put in place.
Concern that noise will be detrimental for nearby residents.	<p>The Applicant has conducted construction and operational noise modelling to assess the potential impacts on nearby receptors. Noise impacts from construction and operation are predicted to be not significant. Changes in noise due to construction traffic are predicted to result in a minor adverse effect at worst, which is not significant. The Applicant has included a Framework CEMP in Appendix 16C [EN010106/APP/6.2] and CTMP and Travel Plan in Appendix 13C [EN010106/APP/6.2] of the Environmental Statement to manage potential impacts from noise and traffic during construction.</p> <p>During the operational phase some residents on Weirs Drove and Hythe Lane in Burwell, Cambridgeshire may experience some minor adverse effects from noise from the operational Burwell National Grid Substation Extension. Any tonal, impulsive or intermittent acoustic features will be carefully considered and specific noise control and mitigation measures will be included. This includes procuring equipment with lower (than modelled) sound power levels, silencers and/or acoustic barriers on equipment, and dynamic vibration absorbers and acoustic active cancelling for power transformers as necessary. These effects on human health are considered to be not significant.</p>
Potential for increased rainwater run-off which may increase flood risk.	The Applicant has embedded a range of mitigation measures within the Scheme design to reduce potential impacts on the water environment. This includes removing infrastructure from Flood Zone 3b areas, the implementation of swales/drainage ditches and raising

Matter raised	Regard had to comment by the Applicant
	panels to 0.85m above ground level in areas at risk of flooding. A Flood Risk Assessment has been submitted as part of the Environmental Statement at Appendix 9C [EN010106/APP/6.2]. The FRA demonstrates that the Scheme does not increase flood risk within or surrounding the Scheme.
The grid connection is too far from the proposed sites.	Appendix 4A Alternative Sites Assessment [EN010106/APP/6.2] includes the reasons for selecting the Burwell National Grid Substation and the area of search from this connection point. It also explains how suitable land within the area of search has been identified. The latter includes the process of excluding various planning and environmental constraints including best and most versatile agricultural land which is the characteristic of the land between Fordham and Burwell.

6.5 Section 42(1)(d) consultation

6.5.1 In response to the consultation carried out under s42(1)(d) and s44 of the PA 2008, a total of 34 consultees responded.

6.5.2 Of these responses, 9 were in a letter format and 25 used the consultation questionnaire provided.

6.5.3 The matters raised by the consultees included the following:

- a. Concern at the loss of land from agricultural production and the effects of increased imports of food from abroad;
- b. Concern at the Scheme's visual and landscape impacts;
- c. Opposition to solar development on the grounds that it is inefficient;
- d. Concern at the impact of the Scheme on local wildlife;
- e. There is already a high level of new energy development around Burwell;
- f. Concern at whether decommissioning will take place;
- g. Concern at the potential disruption caused during the construction phase of the project;
- h. Opposition to cables being buried under their land;

- i. Concern at the impact of the Scheme on the value of their property;
- j. The Scheme is too large;
- k. The Scheme is in the wrong setting and will negatively affect the character of the area;
- l. Concern at the safety of the BESS;
- m. Preference for the construction of solar on brownfield land;
- n. Concern at the impact of the Scheme on local businesses such as the horse racing industry and the Royal Worlington and Newmarket Golf Club;
- o. Concerns about the statutory consultation;
- p. The Scheme must not negatively impact the neighbouring Kennett Garden Village; and,
- q. Concern at the Applicant's means and experience to deliver a project such as this.

6.5.4 The Applicant has had regard to all comments received from Section 42(1)(d) and 44 consultation in **Appendix J-4**. With regard to the matters raised in 6.5.3 above, the Applicant has set out its approach in **Table 6-58** below.

Table 6-58 Regard had to comments received from Section 42(1)(d) and 44 consultation

Matter raised	Regard had to comment by the Applicant
Concern at the loss of land from agricultural production and the effects of increased imports of food from abroad.	The majority of the land (96.2%) within the Sites is classed as not being 'Best and Most Versatile' land. Agricultural land is not lost to the temporary development and agricultural production will be maintained throughout as site will be grazed by sheep. The fallow period created by the scheme being in situ will allow recovery of soil organic matter and remediate deep compaction from cultivation. An assessment of the agricultural quality and versatility has been provided in Chapter 12 of the Environmental Statement [EN010106/APP/6.1].
Concern at the Scheme's visual and landscape impacts.	An LVIA, as set out in Chapter 10 of the Environmental Statement [EN010106/APP/6.1], has been undertaken to inform the design process and reduce the visibility of the Scheme as far as practicable. As set out in the LVIA, the design has reduced the

Matter raised	Regard had to comment by the Applicant
	visibility of the Scheme by distancing the panels from villages and roads, retaining existing hedgerows, reducing the height of the panels to 2.5 metres and implementing substantial areas of new planting. These measures will reduce the Scheme, so that we consider it will not be visually intrusive. An Outline LEMP is presented in Appendix 10I of the ES [EN010106/APP/6.2] which sets out these measures and is secured through the DCO.
Opposition to solar development on the grounds that it is inefficient.	Solar energy generation is a proven technology and forms an integral part of the energy generation mix within the United Kingdom both now and going forward. There is an established need for solar energy generation and the Scheme will make a significant contribution to meeting that need. Further details that relate to the need for solar generation technology can be found within the Statement of Need [EN010106/APP/7.1].
Concern at the impact of the Scheme on local wildlife.	The Scheme has sought to integrate the development into the existing environment, retaining areas important to wildlife, including woodlands, hedgerows, areas of grasslands and watercourses. An assessment of the impacts on all ecological features is presented in Chapter 8: Ecology and Nature Conservation of the Environmental Statement [EN010106/APP/6.1]. This assessment concludes that there will be no significant effects on ecology and nature conservation.
There is already a high level of new energy development around Burwell.	The Scheme will retain existing trees and hedges around the proposed Substation at Burwell to reduce its visibility. The proposed substation will also be smaller than the existing sub-

Matter raised	Regard had to comment by the Applicant
	station. Locating a new substation adjacent to the existing Burwell substation is logical in landscape and visual terms as it consolidates similar land uses within the landscape and visual context.
Concern at whether decommissioning will take place.	The DCO will require that the Scheme is decommissioned after 40 years of operation, and that requirement will be enforceable through the Planning Act 2008 against the person with the benefit of the Order at that time. A Framework DEMP has been prepared and is presented in Appendix 16E of the ES [EN010106/APP/6.2] which provides the outline mitigation measures to be adhered to during decommissioning. The DCO includes a requirement in Schedule 2 requiring the preparation and approval of the DEMP substantially in accordance with the Framework DEMP, and for the approved DEMP to be implemented. That requirement is also enforceable through the Planning Act 2008.
Concern at the potential disruption caused during the construction phase of the project.	<p>A Framework CEMP has been produced and submitted as part of the DCO (Appendix 16C of the Environmental Statement [EN010106/APP/6.2]). This details mitigation measures that would be adopted during construction to minimise disruption and environmental impacts during construction. A full CEMP will be produced during detailed design and prior to construction.</p> <p>A Framework CTMP and Travel Plan has been submitted as part of the DCO (Appendix 13C of the Environmental Statement [EN010106/APP/6.2]), which details the traffic management measures to be adopted during construction to minimise impacts on the</p>

Matter raised	Regard had to comment by the Applicant
	local road network. A Design and Access Statement has also been submitted as part of the DCO [EN010106/APP/7.3].
Opposition to cables being buried under their land.	The underground cables will cross agricultural land. However, they will be buried at a suitable depth to enable the field above to remain in active cultivation with the existing soil replaced on top of the cables. Further information can be found in the Design and Access Statement [EN010106/APP/7.3]. The detailed dimensions for the underground cables and associated works can be found within Chapter 3 of the Environmental Statement [EN010106/APP/6.1].
Concern at the impact of the Scheme on the value of their property.	Across the United Kingdom our experience is that solar PV has been shown not to negatively affect the value of property or businesses nearby.
The Scheme is too large.	The need for the Scheme is set out in the Statement of Need [EN010106/APP/7.1]. This demonstrates that there is a need for a Scheme of this size. The Scheme design has evolved to avoid concentration in any one area. Further information can be found in the Design and Access Statement [EN010106/APP/7.3] and the Parameter plans outlining the proposed changes can be found in the Environmental Statement Figures [EN010106/APP/6.2].
The Scheme is in the wrong setting and will negatively affect the character of the area.	An Alternative Sites Assessment has been submitted with the DCO Application in Appendix 4A Alternative Sites Assessment of the ES [EN010106/APP/6.2]. This, as well as the Alternatives chapter (Chapter 4 of the ES [EN010106/AP/6.1]) describes

Matter raised	Regard had to comment by the Applicant
	<p>the process followed to consider alternative sites during the Scheme design development, and how the final Order limits were set.</p> <p>A suite of specialist reports have been undertaken by the Applicant to assess the potential impacts resulting from the Scheme. These include a full landscape and visual impact assessment alongside a landscape character assessment that have been undertaken regarding the Scheme. Full details of each of these assessments can be found in the Environmental Statement [EN010106/APP/6.1].</p> <p>Taking into account the feedback from the PEIR and the results of the specialist surveys and studies a suite of landscape mitigation measures and design changes have been proposed to mitigate the impacts of the Scheme. This has included the removal of some areas previously suggested for solar use; the addition of 'set back' areas from field edges closest to human receptors and the introduction of a large amount of tree and grassland planting.</p> <p>These measures are shown on the Parameter Plans in Figures 3-1 and 3-2 of the ES [EN010106/APP/6.3].</p>
Concern at the safety of the BESS.	<p>The Applicant has developed an Outline Battery Safety Fire Management Plan (OBFSMP) in order to evaluate, mitigate and be fully prepared for the risks associated with the battery technology. The Plan has been developed through consultation with the local planning authorities, the Suffolk Fire and Rescue Service (who have also responded on behalf of the Cambridgeshire Fire and Rescue Service) and has also been shared with the Health and Safety Executive. Further details can be found in the Outline Battery Fire Safety</p>

Matter raised	Regard had to comment by the Applicant
	<p>Management Plan [EN010106/APP/7.6].</p> <p>The following overall measures will be implemented during detailed design to minimise the risk of battery fire;</p> <ul style="list-style-type: none"> a. Components that comply with all relevant legislation and the design principles set out in the Outline Battery Fire Safety Management Plan [EN010106/APP/7.6] will be used; b. The manufacturer will undertake extensive testing and analysis to assess fire risk; c. A heating and cooling system will be provided on each BESS enclosure to prevent the battery system experiencing overheating or freezing environments; d. The installation area and equipment will be protected from flooding, which has the potential to cause electrical fires. The risk of flooding has been assessed as part of the Flood Risk Assessment in Appendix 9C: of the Environmental Statement [EN010106/APP/6.2] and mitigation measures to protect it from flooding have been recommended which will be developed as part of the detailed design; e. Installation areas will comply with appropriate local fire, electrical and building code requirements, including access to fire trucks in case of emergency; f. Fire detection systems, such as multispectral infrared flame detectors, will be installed to detect any fire;

Matter raised	Regard had to comment by the Applicant
	<ul style="list-style-type: none"> g. Two sources of firefighting water will be installed on site during operation. These include internal automated sprinkler or water mist system and firefighting water for the Fire and Rescue team; h. Each BESS container will be fitted within an automatic sprinkler or water mist system for fire suppression in the event of an unplanned fire. The water supply for this system will be integrated into the design of each BESS container and located either internally or externally to each BESS. The containment of this water would be within a sump integrated into the BESS container; i. Each BESS compound requires a maximum of 242.5m³ of water storage for use by fire fighters in case of an unplanned fire in the BESS compound. Water would either be stored two half capacity sectional steel panel tank or two half capacity cylindrical steel panel tanks; j. Each BESS area would be lined with an impermeable surface to prevent water used during firefighting operations infiltrating into the soils underlying the BESS area. Each BESS area would also require a bunded lagoon capable of capturing 242.5m³ of fire water. The lagoon would have a volume of approximately 410m³, which would allow the water to be stored following an emergency event and removed from site if contaminated; and k. The Scheme design will include adequate separation and

Matter raised	Regard had to comment by the Applicant
	<p>firewalls between battery banks to ensure that an isolated fire would not become widespread and lead to a major incident.</p> <p>In addition to the above, a Fire Emergency Response Plan and a Fire Service Site Specific Risk Assessment will be produced for each BESS area. This will be secured through the Framework OEMP provided at Appendix 16F of the ES [EN010106/APP/6.2], the implementation of which is secured via a Requirement to the DCO.</p>
<p>Preference for the construction in solar in alternative locations.</p>	<p>Solar panels are being placed on factory roofs, warehouses and new build homes as well as in large-scale settings such as the Scheme. There is a demonstrated need for the Scheme to be built at the scale it is and this is set out in the Statement of Need [EN010106/APP/7.1] in the section titled Solar is Economically Efficient in GB.</p>
<p>Concern at the impact of the Scheme on local businesses such as the horse racing industry and the Royal Worlington and Newmarket Golf Club.</p>	<p>The Applicant's assessments have found there are no community facilities or businesses that would likely experience a significant effect on their amenity during the construction or operation phase. These findings can be found in Chapter 12 of the Environmental Statement [EN010106/APP/6.1]. They take into account the results of the air quality, noise, transport and visual assessments.</p> <p>The Applicant has prepared its proposals having had regard to responses received through the statutory consultation. In response the Applicant has amended the design to move Sunnica Energy Farm further away from settlements and businesses. Further information can be found in the</p>

Matter raised	Regard had to comment by the Applicant
	Design and Access Statement [EN10106/APP/7.3].
Concerns about the statutory consultation.	<p>The NSIP process is a fixed statutory process that requires us to consult with prescribed bodies and persons with a land interest which we have done through the statutory consultation and subsequent targeted consultation. During the statutory consultation we consulted, as required by the Planning Act 2008, with the community as set out in the SoCC (Appendix D-2). We received a significant number of responses as demonstrated by Chapter 6 of this report. The Applicant published notices in the community advertising the consultation and made available a number of materials to facilitate the consultation including the Preliminary Environmental Information Report (PEI Report) which included the preliminary results of the Applicant's environmental impact assessment activity. Subject to the Application being accepted for examination, there will be a further opportunity for interested parties to register and submit their feedback and be involved throughout the examination of the application.</p>
The Scheme must not negatively impact the neighbouring Kennett Garden Village.	<p>Since the Preliminary Environmental Information Report, the Scheme design has been amended. W16 has now been removed and W15 has been reduced in size. Woodland planting has been designed along the edge of W15 to screen the views of panels from the future residents. Please refer to Figures 3-1 and 3-2 of the ES [EN010106/APP/6.3]. This has reduced the anticipated landscape and visual effects of the Scheme on residents within the future Kennett Garden Village.</p>

Matter raised	Regard had to comment by the Applicant
	Kennett Garden Village has been shortlisted as a cumulative development and included in the cumulative assessments presented in the technical chapters where relevant. Cumulative effects have been summarised in Chapter 17 of the ES [EN010106/APP/6.1].
Concern at the Applicant's means and experience to deliver a project such as this.	The Applicant has a strong track record with consenting, constructing, operating and maintaining large-scale solar PV assets in the United Kingdom and internationally. This includes constructing one of the largest solar farms currently operational in the United Kingdom. The Development Consent Order includes a Framework Construction Environmental Management Plan (CEMP) and the Applicant will be required to construct the Scheme following all the guidelines as set out in the CEMP. This provides assurance that the regulations will be followed irrespective of the track record of the Applicant. Further details of this can be found in the Framework Construction Environmental Management Plan (CEMP) in chapter 16C of the Environmental Statement [EN010106/APP/6.2], the approval and implementation of which will be secured by a requirement in Schedule 2 of the DCO.

6.6 Additional Section 42(1)(d) consultation

- 6.6.1 Following the statutory consultation, the Applicant undertook targeted consultation with some s42(1)(d) consultees as required by the Planning Act 2008 following changes to the Order limits. The Applicant has set out its process for carrying out the targeted consultation and identification of land interests in Chapter 5.
- 6.6.1 The Applicant received nine pieces of feedback from the targeted consultation. As well as identified land interests, the Applicant received comments from the following statutory undertakers:

- a. Openreach;
- b. BT;
- c. National Grid; and,
- d. Cambridgeshire County Council.

6.6.2 Matters raised by the consultees included:

- a. The drawings of the sites are small scale;
- b. Not enough information has been provided to enable comment;
- c. Timescales around temporary works and wider phases of the Scheme;
- d. Anticipated change on farming activity;
- e. Concern that the Scheme would impact on human health;
- f. Concern the Scheme would impact property values; and,
- g. Request under the Freedom of Information Act.

6.6.3 The Applicant has had regard to all comments received from Section 42(1)(d) consultation in **Appendix J-5**. With regard to the matters raised in 6.6.2 above, the Applicant has set out its approach in **Table 6-59** below.

Table 6-59 Regard had to comments received from additional Section 42(1)(d) consultation

Matter raised	Regard had to comment by the Applicant
The drawings of the sites are small scale.	The Applicant has provided larger scale plans and further explanation as to why land is proposed for use within the Order limits on request to consultees who contacted the project team through the publicised communication channels.
Not enough information has been provided to enable comment.	The Applicant considers that it has provided sufficient detail to enable consultees to give informed feedback to the consultation. This has included publishing a Preliminary Environmental Information Report (PEI Report) which included a comprehensive scheme description. This information was necessarily preliminary in nature as the Applicant's assessment activity was ongoing. As is established practice, the Applicant assessed the Scheme's impact according to Rochdale Envelope method of the maximum parameters or impact, meaning that a worst-case scenario for the impacts of the Scheme has been assessed in the PEI Report

Matter raised	Regard had to comment by the Applicant
	<p>and the Environmental Statement. Further information on the Scheme is provided within Chapter 3: Scheme Description of the Environmental Statement [EN010106/APP/6.1]. It is established practice that detailed design only be finalised after submission of the DCO Application. Finalisation of the detailed design will be secured by a requirement in the DCO.</p> <p>Where consultees made requests for additional information, the Applicant has provided larger scale plans and further explanation as to why land is proposed for use within the Order limits on request to consultees who contacted the project team through the publicised communication channels.</p>
<p>Timescales around temporary works and wider phases of the Scheme.</p>	<p>The Applicant has submitted a Framework CTMP and Travel Plan in Appendix 13C of the Environmental Statement [En010106/APP/6.2]. This contains details on access points, routes, road closures and vegetation management required for HGV and crane access.</p> <p>The anticipated operating life of Sunnica Energy Farm (the Scheme) would be 40 years. At the end of the Scheme's operating life, it would be decommissioned as required by its DCO conditions. Subject to receiving development consent, the earliest possible start date for construction would be Winter 2022. Spring 2025 is the earliest possible time at which the Scheme would begin operations under its proposed agreement with National Grid.</p>
<p>Anticipated change on farming activity.</p>	<p>Details on the impacts to farming are assessed within the Chapter 12: Socio-economics and land use of the</p>

Matter raised	Regard had to comment by the Applicant
	Environmental Statement [EN010106/APP/6.1].
Concern that the Scheme would impact on human health.	The Applicant has assessed the impact of the Scheme on human health, as set out in Chapter 15 of the ES [EN010106/APP/6.1]. No significant impacts are expected on human health as a result of the Scheme.
Concern the Scheme would impact property values.	Across the United Kingdom our experience is that solar PV has been shown not to negatively affect the value of property or businesses nearby.
Request under the Freedom of Information Act.	Sunnica Ltd is not a public authority and is not therefore subject to the Freedom of Information Act. Information relating to the ownership of Sunnica Ltd is publicly available through Companies House.

6.7 Section 48 (s48) consultation

6.7.1 As set out in 6.1.2, the Applicant solicited responses from consultees under s48 of the PA 2008.

6.7.2 None of the respondents to the consultation identified themselves as responding specifically under s48 of the PA 2008 and therefore responses under section 48 are considered to have been covered in the above sections.

7 Conclusion

7.1 Compliance with advice and governance

7.1.1 The Applicant has undertaken a consultation process which complies with the DLUHC guidance on the pre-application process (March 2015), as well as relevant advice from the Inspectorate.

7.1.2 **Table 7-1** evidences how the Applicant has complied with DLUHC guidance on the pre-application process (March 2015):

Table 7-1 Compliance with DLUHC guidance on the pre-application process (March 2015)

Para	Requirement	Evidence of compliance
17	When circulating consultation documents, developers should be clear about their status, for example ensuring it is clear to the public if a document is purely for purposes of consultation.	Documents produced as part of the consultation clearly stated their status as materials produced for the purposes of the consultation. Letters issued to consultees as part of the s42 and s47 consultations set out that they contained details of statutory consultation. The status of the consultation booklet is set out in its page 4, and the status of the consultation questionnaire on its page 3. Statutory notices and the consultation booklet also made clear that the PEI Report had been prepared as a report on the preliminary outcomes of the environmental assessment, for the purposes of consultation. Copies of these documents can be found in Appendix F-1 to G-4.
18	Early involvement of local communities, local authorities and statutory consultees can bring about significant benefits for all parties.	The Applicant engaged early with local communities, local authorities, and statutory consultees, including a round of non-statutory consultation in June-July 2019. Early engagement is summarised in sections 2.2 and 2.4 of this report.

Para	Requirement	Evidence of compliance
19	The pre-application consultation process is crucial to the effectiveness of the major infrastructure consenting regime. A thorough process can give the Secretary of State confidence that issues that will arise during the 6 months examination period have been identified, considered, and – as far as possible – that applicants have sought to reach agreement on those issues.	<p>The Applicant has conducted a thorough consultation process which has allowed it to identify, consider and, as far as possible, seek to reach agreement on issues likely to arise during the examination. The early engagement and non-statutory consultation set out in chapter 2 of this report provided the opportunity to identify and consider issues early in the development of the Scheme. We have set out a summary of the regard had to the issues raised in the non-statutory consultation in Table 2-4.</p> <p>The statutory consultation set out in Chapter 4 of this document built on this understanding and further identified and considered issues likely to arise. We summarise the regard had to responses raised through the statutory consultation in Chapter 6 of this report. As recommended by the Inspectorate's Advice note fourteen: Compiling the Consultation Report, in preparing this section the Applicant considered grouping the responses under the three strands of consultation – s42, s47 and s48. All consultees prescribed under s42(1)(a) and (b) are required to receive the s48 notice. None of the consultees who responded identified themselves as specifically responding to the s48 notice. Given those required to receive the s48 notice are the same consultees as prescribed by</p>

Para	Requirement	Evidence of compliance
		s42(1)(a) and (b), those consultees are dealt with together in section 6.2; responses from the local community, consulted under s47, are addressed set out in section 6.3; from the parish councils identified above in section 4.8 (that is, not parish councils prescribed under s42(1)(a), but consulted as part of the local community under s47) in section 6.4; and responses from Category 1, 2 and 3 people, pursuant to sections 42(1)(d) and 44 are addressed in section 6.5. The approach to s48 consultees is explained briefly in section 6.7. Appendices J-1 to J-5 include evidence of how the Applicant has considered issues raised through the statutory consultation. Where appropriate, the Applicant is preparing Statements of Common Ground (SoCGs) with relevant statutory consultees to demonstrate areas of agreement.
20	<p>Experience suggests that, to be of most value, consultation should be:</p> <ul style="list-style-type: none"> – Based on accurate information that gives consultees a clear view of what is proposed including any options; – 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, – Engaging and accessible in style, encouraging consultees to react and offer their views. 	For both the non-statutory consultation and statutory consultation, the Applicant shared information at an early enough stage to allow the proposal to be influenced, while being sufficiently developed to provide some detail on what is being proposed. In each consultation, the Applicant developed a clear scope for what could be influenced by consultees. For the non-statutory consultation, this was to support design development and the process

Para	Requirement	Evidence of compliance
		<p>of environmental impact assessment by gathering feedback from consultees on the initial Scheme for Sunnica Energy Farm. This included options on whether the battery storage element of the scheme should be spread around Sunnica East and Sunnica West or concentrated at particular locations.</p> <p>For the statutory consultation, this was to feed back on the proposed Sunnica Energy Farm, the Scheme design, and the initial outcomes of the EIA as set out in the PEI Report. For each consultation, the Applicant published a booklet written in an engaging and accessible style, setting out what it was possible to influence at that stage, providing accurate information that gave consultees a clear view of what was proposed, and encouraging them to react and offer their views. A copy of the booklet produced for the non-statutory consultation is included with Appendix A-3. A copy of the booklet produced for the statutory consultation is included in Appendix G-4.</p> <p>Each phase of consultation activity was timed to ensure that the Applicant could consider feedback in developing the Scheme. The regard had to responses to the non-statutory consultation is summarised in Table 2-4 and the to the statutory consultation in Chapter 6 and Appendices J-1 to J-5.</p> <p>The level of response to each</p>

Para	Requirement	Evidence of compliance
		consultation, including 725 responses to the statutory consultation from the community, demonstrates that consultees were able to access and engage with the material presented in order to provide detailed feedback.
25	<p>Consultation should be thorough, effective and proportionate. Some applicants may have their own distinct approaches to consultation, perhaps drawing on their own or relevant sector experience, for example if there are industry protocols that can be adapted. Larger, more complex applications are likely to need to go beyond the statutory minimum timescales laid down in the Planning Act to ensure enough time for consultees to understand project proposals and formulate a response. Many proposals will require detailed technical input, especially regarding impacts, so sufficient time will need to be allowed for this. Consultation should also be sufficiently flexible to respond to the needs and requirements of consultees, for example where a consultee has indicated that they would prefer to be consulted via email only, this should be accommodated as far as possible.</p>	<p>The Applicant has conducted a thorough, effective and proportionate consultation. The period provided to comment for consultation under s42, s47, and s48 of the PA 2008 was significantly greater than the 28 calendar days required to be provided for comments as prescribed by s45(2) of the PA 2008. As set out in 4.1.4, the Applicant also extended the deadline for responses from the original 2 December 2020 to 18 December 2020 during the consultation period. This was in part due to the enhanced public health measures adopted in response to COVID-19 adopted by the Government at a national level from 5 November 2020 until 2 December 2020 and demonstrates flexibility in responding to the needs of consultees and the circumstances at play.</p> <p>The Applicant has also been conscious of the need to be sufficiently flexible to respond to the needs and requirements of consultees. As set out in 4.5.20-21, the Applicant provided a variety of means to respond to the statutory consultation, including completing a questionnaire online,</p>

Para	Requirement	Evidence of compliance
		<p>completing and returning a hard copy of the questionnaire, submitting comments by letter, or submitting comments by email. The Applicant also provided a variety of means of finding out about the proposal, including sending a copy of the consultation booklet to all addresses in consultation zone 1 alongside a consultation questionnaire and pre-addressed Freepost envelope, a virtual public exhibition, webinars, telephone surgeries, and accepting enquiries by Freephone, email or Freepost. Details of this are set out in section 4.5.</p>
26	<p>The Planning Act requires certain bodies and groups of people to be consulted at the pre-application stage, but allows for flexibility in the precise form that consultation may take depending on local circumstances and the needs of the project itself. Sections 42 – 44 of the Planning Act and Regulations set out details of who should be consulted, including local authorities, the Marine Management Organisation (where appropriate), other statutory bodies, and persons having an interest in the land to be developed. Section 47 in the Planning Act sets out the applicant's statutory duty to consult local communities. In addition, applicants may also wish to strengthen their case by seeking the views of other people who are not statutory consultees, but who may be significantly affected by the project.</p>	<p>The Applicant has identified and consulted with parties prescribed by s42, s43, and s44 of the PA 2008, as well as the local community as prescribed in s47 of the PA 2008 and defined in the SoCC. Details of how the Applicant consulted in accordance with each of these sections of the PA 2008 are set out in Chapter 4 of this report. In addition, the Applicant sought the views of a range of groups which were not statutory consultees but were deemed to have a potential interest. Details of these are set out in Appendix H-1.</p>
27	<p>The Planning Act and Regulations set out the statutory consultees and</p>	<p>Statutory consultees such as the host local authorities,</p>

Para	Requirement	Evidence of compliance
	<p>prescribed people who must be consulted during the pre-application process. Many statutory consultees are responsible for consent regimes where, under section 120 of the Planning Act, decisions on those consents can be included within the decision on a Development Consent Order. Where an applicant proposes to include non-planning consents within their Development Consent Order, the bodies that would normally be responsible for granting these consents should make every effort to facilitate this. They should only object to the inclusion of such non-planning consents with good reason, and after careful consideration of reasonable alternatives. It is therefore important that such bodies are consulted at an early stage. In addition, there will be a range of national and other interest groups who could be make an important contribution during consultation. Applicants are therefore encouraged to consult widely on project proposals.</p>	<p>Environment Agency, Natural England and Historic England were engaged with early in the development of the Scheme, prior to the non-statutory consultation. Early engagement is set out in Table 2-1. These bodies continued to be engaged in the period between this and the statutory consultation as set out in Table 2-5. They were then consulted under s42 of the PA 2008 as set out in section 4.3. The Explanatory Memorandum [EN010106/APP/3.2] gives more specific detail on the consents proposed to be included in the DCO, and the provisions proposed to be disapplied by the DCO. Detailed discussions are ongoing between the Applicant and consultees such as National Highways, the Environment Agency, and the relevant internal drainage board with respect to disapplication of consents and appropriate protective provisions.</p> <p>In addition, the Applicant sought the views of a range of groups which were not statutory consultees but were deemed to have a potential interest. Details of these are set out in Appendix H-1.</p>
29	<p>Applicants will often need detailed technical input from expert bodies to assist with identifying and mitigating the social, environmental, design and economic impacts of projects, and other important matters. Technical expert input will often be needed in advance of formal compliance with</p>	<p>The Applicant sought technical input from relevant expert bodies at every stage of the Scheme development. This included through the early engagement set out in Table 2-1 and the ongoing engagement set out in Table</p>

Para	Requirement	Evidence of compliance
	the pre-application requirements. Early engagement with these bodies can help avoid unnecessary delays and the costs of having to make changes at later stages of the process. It is equally important that statutory consultees respond to a request for technical input in a timely manner. Applicants are therefore advised to discuss and agree a timetable with consultees for the provision of such inputs.	2-4 , as well as during the statutory consultation set out in Chapter 4. Technical engagement has been particularly relevant in relation to impacts of the Scheme, the approach to mitigation, DCO requirements and the EIA. This has involved such consultees as Natural England, the Environment Agency, National Highways, and the host local authorities including the relevant departments within those authorities, such as highways and heritage.
34	Local authorities have considerable expertise in consulting local people. They will be able to draw on this expertise to provide advice to applicants on the makeup of the community and on how consultation might best be undertaken. In addition, many authorities will already have a register of local interest groups and should be able to readily provide applicants with an appropriate list of such groups for the purposes of consultation.	The Applicant engaged early with host local authorities to seek expertise on these issues. This included early engagement as set out in Table 2-1 and ongoing engagement as set out in Table 2-4 . This included engagement on community consultation methods, and the Applicant shared a draft of the SoCC on an informal basis before consulting with the host authorities formally. As prescribed by s47 of PA 2008, the Applicant prepared a SoCC setting out how it proposed to consult the people living in the vicinity of the land on the proposed application and consulted with each local authority that is within s43(1) of the PA 2008 on the SoCC. The regard that the Applicant had to responses received as part of this consultation is set out in Table 4-1 . The Applicant sought advice on local interest groups as part of this

Para	Requirement	Evidence of compliance
		engagement.
35	<p>The applicant has a duty under section 47 of the Planning Act to prepare a Statement of Community Consultation, and then to conduct its consultation in line with that statement. Before doing so, the applicant must consult on their Statement of Community Consultation with each local authority in whose area the proposed development is situated. This may require consultation with a number of different local authorities, particularly for long, linear projects. In this situation, the local authorities in question should, as far as practicable, co-ordinate their responses to This will ensure that the consultation proposals set out in the Statement are coherent, effective, and work across local authority boundaries.</p>	<p>The Applicant engaged early with host local authorities to seek expertise on these issues. This included early engagement as set out in Table 2-1 and ongoing engagement as set out in Table 2-4. This included engagement on community consultation methods, and the Applicant shared a draft of the SoCC on an informal basis with the host authorities before consulting with them formally. As prescribed by s47 of PA 2008, the Applicant prepared a SoCC setting out how it proposed to consult, about the proposed application, people living in the vicinity of the land and consulted with each local authority that is within s43(1) of the PA 2008 on the SoCC. The regard that the Applicant had to responses received as part of this consultation is set out in Table 4-1.</p>
36	<p>Even where it is intended that a development would take place within a single local authority area, it is possible that its impacts could be significantly wider than just that local authority's area - for example if the development was located close to a neighbouring authority. Where an applicant decides to consult people living in a wider area who could be affected by the project (e.g. through visual or environmental impacts, or through increased traffic flow), that intention should be reflected in the Statement of Community Consultation.</p>	<p>For the purposes of community consultation, the Applicant defined three zones of consultation. Consultation zone 1 comprised a buffer of at least 1 mile from the boundary of the Scheme. Consultation zone 2 included the areas of the host local authorities not included in consultation zone 1, and consultation zone 3 included neighbouring local authorities. This recognised potential wider interest in the Scheme.</p>

Para	Requirement	Evidence of compliance
41	Where a local authority raises an issue or concern on the Statement of Community Consultation which the applicant feels unable to address, the applicant is advised to explain in their consultation report their course of action to the Secretary of State when they submit their application.	The regard that the Applicant had to responses received as part of this consultation is set out in Table 4-1 . The responses at this stage included comments requesting more detail, but also that the SoCC be simplified – there was some tension between these two requests in the Applicant’s view. The Applicant therefore sought to strike a balance and avoid repetition but where specific additional detail was requested, this was included in the SoCC. Graphics were included in the SoCC as appropriate – for example, Figure 1 illustrating the planning process.
50	It is the applicant’s responsibility to demonstrate at submission of the application that due diligence has been undertaken in identifying all land interests and applicants should make every reasonable effort to ensure that the Book of Reference (which records and categories those land interests) is up-to-date at the time of submission.	The Applicant has diligently sought to identify all land interests and ensure that the Book of Reference [EN010106/4.3] remains up to date. Details of the diligent inquiry process undertaken in identifying Category 1, 2 and 3 interests are set out in 4.3.5 – 4.3.21.
54	In consulting on project proposals, an inclusive approach is needed to ensure that different groups have the opportunity to participate and are not disadvantaged in the process. Applicants should use a range of methods and techniques to ensure that they access all sections of the community in question. Local authorities will be able to provide advice on what works best in terms of consulting their local communities given their experience of carrying out consultation in their area.	The Applicant has adopted an inclusive approach to consultation to ensure that different groups have the opportunity to participate and are not disadvantaged by the process. The SoCC included proposals to support the participation of hard to reach groups in the consultation, and the Applicant incorporated local authority feedback on this subject into the SoCC. Details of compliance with the approach

Para	Requirement	Evidence of compliance
		<p>set out in the SoCC are included in Table 4-8, and details of the regard the Applicant had to local authority comments on this area are included in Table 4-1.</p> <p>The Applicant also recognised the fact that consultees may not be able to or comfortable with accessing consultation materials online. The Applicant made a range of ways for consultees to find out more about the proposals and respond without use of the internet, including sending consultation booklets and questionnaires to all addresses in consultation zone 1, offering telephone surgeries, advertising in print media and accepting responses to the consultation by Freepost.</p>
55	<p>Applicants must set out clearly what is being consulted on. They must be careful to make it clear to local communities what is settled and why, and what remains to be decided, so that expectations of local communities are properly managed. Applicants could prepare a short document specifically for local communities, summarising the project proposals and outlining the matters on which the view of the local community is sought. This can describe core elements of the project and explain what the potential benefits and impacts may be. Such documents should be written in clear, accessible, and non-technical language. Applicants should consider making it available in formats appropriate to the needs of people with disabilities if requested. There</p>	<p>For each consultation, the Applicant published a booklet written in an engaging and accessible style, setting out what it was possible to influence at that stage, providing accurate information that gave consultees a clear view of what was proposed, and encouraging them to react and offer their views. At the non-statutory consultation, consultees were offered the opportunity to influence design development and the process of environmental impact assessment by gathering feedback from consultees on the initial Scheme for Sunnica Energy Farm. This included options on whether the battery</p>

Para	Requirement	Evidence of compliance
	may be cases where documents may need to be bilingual (for example, Welsh and English in some areas), but it is not the policy of the Government to encourage documents to be translated into non-native languages.	<p>storage element of the scheme should be spread around Sunnica East and Sunnica West or concentrated at particular locations.</p> <p>For the statutory consultation, consultees had the opportunity to influence the Scheme design and feed back on the initial outcomes of the EIA as set out in the PEI Report.</p> <p>A copy of the booklet produced for the non-statutory consultation is included with Appendix A-3. A copy of the booklet produced for the statutory consultation is included in Appendix G-4. These were supplemented by consultation materials designed to present consultation information in other, interactive formats. At the statutory consultation, this included a virtual exhibition and webinars. Copies of consultation materials were available in alternative formats on request.</p>
57	The Statement of Community Consultation should act as a framework for the community consultation generally, for example, setting out where details and dates of any events will be published. The Statement of Community Consultation should be made available online, at any exhibitions or other events held by applicants. It should be placed at appropriate local deposit points (e.g. libraries, council offices) and sent to local community groups as appropriate.	As set out in 4.2.12, the Applicant included a framework for community consultation in the SoCC, including where details and dates of events would be published. The SoCC was made available on the Scheme website, from 17 September 2020. This was in line with the Government's confirmation that placing materials online meets the requirement to place information on public deposit set out in the Infrastructure

Para	Requirement	Evidence of compliance
		Planning (Publication and Notification of Applications etc.) (Coronavirus) (Amendment) Regulations 2020 (the 2020 Regulations).
58	Applicants are required to publicise their proposed application under section 48 of the Planning Act and the Regulations and set out the detail of what this publicity must entail. This publicity is an integral part of the public consultation process. Where possible, the first of the 2 required local newspaper advertisements should coincide approximately with the beginning of the consultation with communities. However, given the detailed information required for the publicity in the Regulations, aligning publicity with consultation may not always be possible, especially where a multi-stage consultation is intended.	The Applicant publicised the proposed application under s48 of the PA 2008 as set out in Table 4-9 . The dates of these insertions coincided as closely as possible with the start of consultation given the publication schedules of the relevant local newspapers.
68	To realise the benefits of consultation on a project, it must take place at a sufficiently early stage to allow consultees a real opportunity to influence the proposals. At the same time consultees will need sufficient information on a project to be able to recognise and understand the impacts.	For both the non-statutory consultation and statutory consultation, the Applicant shared information at an early enough stage to allow the proposal to be influenced, while being sufficiently developed to provide some detail on what is being proposed. In each consultation, the Applicant developed a clear scope for what could be influenced by consultees. For the non-statutory consultation, this was to support design development and the process of environmental impact assessment by gathering feedback from consultees on the initial Scheme for Sunnica Energy Farm. This included options on whether the battery

Para	Requirement	Evidence of compliance
		<p>storage element of the scheme should be spread around Sunnica East and Sunnica West or concentrated at particular locations.</p> <p>The scope of the statutory consultation was to feed back on the proposed Sunnica Energy Farm, the Scheme design, and the initial outcomes of the EIA as set out in the PEI Report. For each consultation, the Applicant published a booklet written in an engaging and accessible style, setting out what it was possible to influence at that stage, providing accurate information that gave consultees a clear view of what was proposed, and encouraging them to react and offer their views. A copy of the booklet produced for the non-statutory consultation is included with Appendix A-3. A copy of the booklet produced for the statutory consultation is included in Appendix G-4.</p> <p>Each phase of consultation activity was timed to ensure that the Applicant could consider feedback in developing the Scheme. The regard had to responses to the non-statutory consultation is summarised in Table 2-4 and the to the statutory consultation in Chapter 5 and Appendices J-1-J-5.</p> <p>The level of response to each consultation, including 725 responses to the statutory consultation, demonstrates that consultees were able to access and engage with the</p>

Para	Requirement	Evidence of compliance
		material presented in order to provide detailed feedback.
72	<p>The timing and duration of consultation will be likely to vary from project to project, depending on size and complexity, and the range and scale of the impacts. The Planning Act requires a consultation period of a minimum of 28 days from the day after receipt of the consultation documents. It is expected that this may be sufficient for projects which are straightforward and uncontroversial in nature. But many projects, particularly larger or more controversial ones, may require longer consultation periods than this. Applicants should therefore set consultation deadlines that are realistic and proportionate to the proposed project. It is also important that consultees do not withhold information that might affect a project, and that they respond in good time to applicants. Where responses are not received by the deadline, the applicant is not obliged to take those responses into account.</p>	<p>At 87 days, the period provided to comment for consultation under s42, s47, and s48 of the PA 2008 was significantly greater than the 28 calendar days required to be provided for comments as prescribed by s45(2) of the PA 2008. This includes the extension of the consultation period to 18 December 2021 set out in 4.1.4. The Applicant treated all responses received as relevant responses. Responses that were received following the consultation deadline of 18 December 2021 with a postmark dated prior to the consultation deadline were accepted up to 23 December 2021.</p>
73	<p>Applicants are not expected to repeat consultation rounds set out in their Statement of Community Consultation unless the project proposals have changed very substantially. However, where proposals change to such a large degree that what is being taken forward is fundamentally different from what was consulted on, further consultation may well be needed. This may be necessary if, for example, new information arises which renders all previous options unworkable or invalid for some reason. When considering the need for additional consultation, applicants should use the degree of change, the</p>	<p>None of the changes made in response to feedback from either round of consultation have been to a sufficiently large degree to justify additional community consultation. Where minor changes were made, directly affected landowners were consulted (as set out in Chapter 5). However, the degree of change, effect on the local community and level of public interest in the amendments was not considered such as to warrant further wider consultation.</p>

Para	Requirement	Evidence of compliance
	effect on the local community and the level of public interest as guiding factors.	
77	Consultation should also be fair and reasonable for applicants as well as communities. To ensure that consultations is fair to all parties, applicants should be able to demonstrate that the consultation process is proportionate to the impacts of the project in the area that it affects, takes account of the anticipated level of local interest, and takes account of the views of the relevant local authorities.	The Applicant has sought to ensure that the consultation process is proportionate to the impacts of the project in the area that it affects, takes account of the anticipated level of local interest, and takes account of the views of the relevant local authorities. Prior to both the non-statutory and statutory consultation, the Applicant engaged with relevant local authorities to seek their views on whether its proposals for consultation were proportionate and took into account the likely level of local interest. Details of the regard the Applicant had to local authority comments are included in Table 4-1 .
84	A response to points raised by consultees with technical information is likely to need to focus on the specific impacts for which the body has expertise. The applicant should make a judgement as to whether the consultation report provides sufficient detail on the relevant impacts, or whether a targeted response would be more appropriate. Applicants are also likely to have identified a number of key additional bodies for consultation and may need to continue engagement with these bodies on an individual basis.	Details of the regard that the Applicant has had to consultation responses is set out in Appendices J-1 – J-5 . As set out in Table 2-4 , the Applicant continued to engage with a number of stakeholders on technical topics following the close of consultation, particularly where it felt agreeing a SoCG was likely to be helpful.

7.1.3 The Applicant has also considered the advice given in the Inspectorate's *Advice note fourteen: Compiling the Consultation Report*. Details of compliance with this text is included in **Table 7-2**.

Table 7-2 Compliance with the Inspectorate's Advice note fourteen: Compiling the Consultation Report

Advice	Evidence of compliance
Explanatory text should set the scene and provide an overview and narrative of the whole pre-application stage as it relates to a particular project. It would assist if a quick reference guide in bullet point form, summarising all the consultation activity in chronological order, is included near the start of the report.	This is provided in section 1.3.
The applicant should include a full list of the prescribed consultees as part of the consultation report.	This is provided in Appendix E-1 .
A short description of how s43 of the Act has been applied in order to identify the relevant local authorities should be included. This could be supported by a map showing the site and identifying the boundaries of the relevant local authorities.	This is set out in 4.3.4 and Table 4-3 .
Where compulsory acquisition forms part of the draft DCO the consultees who are also included in the book of reference for compulsory acquisition purposes should be highlighted in the consolidated list of prescribed consultees.	An explanation for how section 42(1)(d) people were identified for the purposes of the consultation is set out at 4.3.5 to 4.3.21 and following of this report. As that section confirms, those people are included in the Book of Reference [EN010106/APP/4.3] and a full list of such interests is provided in Appendix E-2 .
It would be helpful to provide a summary of the rationale behind the SoCC methodology to assist the Secretary of State's understanding of the community consultation and provide a context for considering how consultation was undertaken.	This is set out in section 4.2.
Any consultation not carried out under the provisions of the Act should be clearly indicated and identified separately in the report from the	Non-statutory public consultation is set out separately to statutory consultation, in Chapter 2 of this report.

Advice	Evidence of compliance
<p>statutory consultation. This does not necessarily mean that informal consultation has less weight than consultation carried out under the Act, but identifying statutory and non-statutory consultation separately will assist when it comes to determining compliance with statutory requirements.</p>	
<p>The summary of responses, if done well, can save a significant amount of explanatory text. We advise that applicants group responses under the three strands of consultation as follows:</p> <ul style="list-style-type: none"> – S42 prescribed consultees (including s43 and s44); – S47 community consultees; and – S48 responses to statutory publicity. <p>This list should also make a further distinction within those categories by sorting responses according to whether they contain comments which have led to changes to matters such as siting, route, design, form or scale of the scheme itself, or to mitigation or compensatory measures proposed, or have led to no change.</p>	<p>As recommended by the Inspectorate's Advice note fourteen: Compiling the Consultation Report, in preparing this section the Applicant considered grouping the responses under the three strands of consultation – s42, s47 and s48. All consultees prescribed under s42(1)(a) and (b) are required to receive the s48 notice. None of the consultees who responded identified themselves as specifically responding to the s48 notice. Given those required to receive the s48 notice are the same consultees as prescribed by s42(1)(a) and (b), those consultees are dealt with together in section 6.2; responses from the local community, consulted under s47, are addressed set out in section 6.3; from the parish councils identified above in section 4.8 (that is, not parish councils prescribed under s42(1)(a), but consulted as part of the local community under s47) in section 6.4; and responses from Category 1, 2 and 3 people, pursuant to sections 42(1)(d) and 44 are addresseds48, set out in section 6.5. The approach to s48 consultees is explained briefly at section 6.7. In each of these sections, we identify whether comments received have led to changes or no change.</p>
<p>A summary of responses by appropriate category together with a</p>	<p>This is set out in overview in chapter 5 and in detail in Appendices J-1 –</p>

Advice	Evidence of compliance
clear explanation of the reason why responses have led to no change should also be included, including where responses have been received after deadlines set by the applicant.	J-5.

7.1.4 The Applicant considers that it has met the statutory requirements of the pre-application process. As set out in section 1.3, the Applicant has undertaken a programme of non-statutory and statutory consultation.

7.1.5 At each stage, the Applicant has considered and complied with relevant advice and guidance. The information included in **Tables 7-1** and **7-2** supports this through direct reference to DLUHC's and the Inspectorate's guidance on the pre-application process.

7.1.6 As well as preparing this report, the Applicant has set out how it has complied with guidance and advice on consultation in the s55 checklist [EN010106/APP/1.4] that is also part of the DCO application.