



SUNNICA ENERGY FARM

INADEQUACY OF PUBLIC CONSULTATION

SAY NO TO SUNNICA COMMUNITY ACTION GROUP

1. Contents

1.	Contents 1
2.	Introduction 2
3.	Why The Consultation Was Inadequate 4
	<i>3.1. Confusion about Location of the Scheme 4</i>
	<i>3.2. Confusion about the impact on Isleham 6</i>
	<i>3.3. Poor Consultation Material 7</i>
	<i>3.4. Inaccessible Information, Discriminatory Consultation, 'Missing' Consultees 12</i>
	<i>3.5. Ineffectiveness of Webinars 21</i>
	<i>3.6. Missing, Misleading and Conflicting Information 26</i>
	<i>3.7. Inadequate Advertising, Insufficient Time for Review, Lack of Responses 39</i>
	<i>3.8. Consultation Response Receipt/Tracking 43</i>
4.	Conclusion 44
5.	References/Media articles 46
	Appendix 1 – Summary of CAG Survey Results 47
	Appendix 2 – ALC land classification within Sunnica Scheme 55
	Appendix 3 - Analysis of November 2020 Webinar Q+A Sessions 56

2. Introduction

- 2.1.1. **Say No to Sunnica** is a local community action group (CAG), with volunteers from across the 16 parishes affected by the solar and battery plant proposal that is being applied for by Sunnica Ltd.
- 2.1.2. This report is not a representation about the Sunnica proposal; it focuses solely on the adequacy of the consultation process. The report has been written to assist the Planning Inspectorate and Local Authorities with assessing if the applicant's consultation has been adequate further to Section 47 of the Planning Act 2008. With respect to the applicant's duties under Section 49 of the Act these will form part of our written representations when invited.
- 2.1.3. Sunnica Ltd (Sunnica) in this report is taken to be Sunnica and it's agents/representatives.
- 2.1.4. Sunnica carried out a limited non-statutory consultation for their proposal in June/July 2019. Only preliminary information was available at that time, and the scheme boundary was quite different to that outlined in the Statutory Consultation, which ran between 22nd Sept - 18th Dec 2020, during the escalating Covid pandemic and second national lockdown.
- 2.1.5. The Statutory Consultation has been described by District and County Councillors as "woefully inadequate". Primarily, the consultation took the form of a 'high level' booklet that was distributed to households in some of the villages affected by the scheme. This was supported by online-only information, which was highly technical and not accessible to all. There were no public 'in-person' discussions, and there were no physical displays - manned or unmanned - in the affected areas. Public webinars were arranged but these took the form of a monologue by Sunnica followed by questions that had to be put in writing using the chat function, with no two-way dialogue.
- 2.1.6. Whilst we appreciate that during the Covid pandemic, virtual consultations were permitted, we feel very strongly that additional regard **MUST** be made to the guidance notes issued by the Planning Inspectorate to ensure that consultations undertaken during such unprecedented conditions are as inclusive as possible, and that they allow on-going fair participation.
- 2.1.7. Responding to the pandemic the Government passed the Infrastructure Planning (Publication and Notification of Applications etc.) (Amendment) Regulations 2020 which

came into force in July 2020. These regulations provided for physical documents being available locally to be replaced by a website. Government guidance on how information sets out that applicants should ensure the relevant website is well signposted when publishing their notices and that the documents are readily accessible, i.e. documents should be clearly named and logically structured. Guidance also requires that hard copies of any relevant documents must be provided on request. This guidance applies to depositing of physical documents being replaced by placing on a website, it should not be taken to replace exhibitions and meetings where safe to do so.

- 2.1.8. Sunnica's Statutory Consultation did not adhere to this guidance and did not comply with their Statement of Community Consultation (SoCC).
- 2.1.9. Consultation, by definition, implies discussion. The exchange of thoughts to refine an outcome. This is key to the public consultation process in the Planning Act 2008 (The Planning Act). This report highlights the lack of opportunity for public, two-way discussion during, and after, the Statutory Consultation. It provides an overview of the flaws that were brought to our attention by residents through direct communications, as well as surveys that we have undertaken (Appendix 1).
- 2.1.10. It should also be noted that these failings in consultation were highlighted to Sunnica by the CAG and Parish Councils during and after the non-statutory consultation, as well as in the run up to the Statutory Consultation, and during the early weeks of the Statutory Consultation period. Residents wrote letters to Sunnica explaining why the consultation was not working effectively, suggesting improvements that could be made to enable fair participation to more residents and to allow a better assessment of the impact.
- 2.1.11. Councillors and local MPs also contacted Sunnica, expressing the same concerns.
- 2.1.12. During the webinars, residents used the chat function to suggest improvements to the way the consultation was being handled and to express difficulty accessing material etc.
- 2.1.13. Sunnica Ltd had ample time to react and make amendments to the way their Statutory Consultation was being carried out. They did not react and persevered with an ineffective consultation methodology. We feel that the application cannot be accepted at this stage as the requirement for adequate consultation has not been met.

3. Why The Consultation Was Inadequate

3.1. Confusion about Location of the Scheme

- 3.1.1. The Sunnica consultation material gave the impression that the scheme was in Cambridgeshire. In fact, the scheme is in West Suffolk and East Cambridgeshire. Many residents in Suffolk would not necessarily have recognised the impact on them from the advertisements that Sunnica displayed in newspapers.
- 3.1.2. This confusion arose as the scheme was described as a “Solar Energy Farm and Battery Storage Facility Connecting to the Burwell National Grid Substation in Cambridgeshire.” The immediate conclusion is that a) the scheme is at Burwell and b) it is wholly in Cambridgeshire. An extract from the SOCC is shown in Figure 1, but the same description is also used in the Statutory Consultation booklet. Figure 13 shows a newspaper advertisement run in the local newspapers that only refers to “Connecting to the Burwell National Grid Substation in Cambridgeshire”. The statutory advertisements correctly referred to “located near Chippenham and Snailwell in Cambridgeshire, Isleham in Cambridgeshire and Suffolk, and Worlington and Freckenham in Suffolk” but these are unlikely to be read widely.
- 3.1.3. The primary impact of the scheme is not at Burwell. The other local communities are not mentioned in the Consultation booklet until page 6 and even then they are listed under a banner heading that refers to Burwell. Only on the small-scale environmental plans are Cambridgeshire and Suffolk mentioned.
- 3.1.4. People typically do not read past the introduction if they feel that the scheme does not relate to them, and the introduction failed to identify the precise location of the scheme. A small-scale plan opposite the Introduction in the consultation brochure lacked context, did not identify local waypoints and landmarks, and lacked a north point. All community names are in grey text, hard to read and lacking contrast for people with restricted eyesight. No information was provided in the brochure as to the availability of large text versions or where audio described versions could be obtained.
- 3.1.5. Given the emphasis on Burwell, a location where there are already a number of operational solar farms and proposed solar farms, a casual reader from any of the impacted communities might be forgiven for assuming the Sunnica scheme did not affect them.

Introduction

We're inviting feedback from local people on our proposals for Sunnica Energy Farm.

Sunnica Energy Farm is a proposed new solar energy farm and battery storage facility connecting to the Burwell National Grid Substation in Cambridgeshire.

FIGURE 1 - EXTRACT FROM SOCC

- 3.1.6. The vast size and scale of the Sunnica scheme (around 2500 acres) was also not highlighted in the consultation material. This would have enabled distinction between this and the other smaller solar farms (of which we have over 20) in this area. There was nothing in the scheme descriptions offered by Sunnica to make it stand out from these other schemes, or to indicate the significance of the proposal.
- 3.1.7. On the front cover of the consultation booklet (Figure 2) there was no indication that the scheme was a large-scale project and NSIP, when most solar energy schemes locally occupy a few fields. As a result, many residents looked at the front cover and no further, not realising the significance of the proposal to them. It was misleading and actively disengaged people from participating further.



FIGURE 2 - COVER OF BOOKLET

- 3.1.8. Feedback presented to Sunnica following their poorly attended non-statutory consultation meetings included the fact that their non-statutory consultation information had been posted out to properties in plain envelopes addressed to "The Resident." At the time of the non-statutory consultation, many people had taken these to be "junk mail"

and they discarded them without reading (as an example:

[REDACTED]

- 3.1.9. Despite this feedback, Sunnica’s Statutory Consultation booklets were delivered in exactly the same way - plain white envelopes addressed to “The Resident” without any mention of Sunnica or the important content on the outside (including the return address). One resident who lives on Sun Street in Isleham, commented that she had put it straight into the recycling pile as she didn’t realise what it was. Others may well have done the same.

3.2. Confusion about the impact on Isleham

- 3.2.1. Just over 3 weeks before the start of the Statutory Consultation, the local press coverage was as follows (Figure 3):

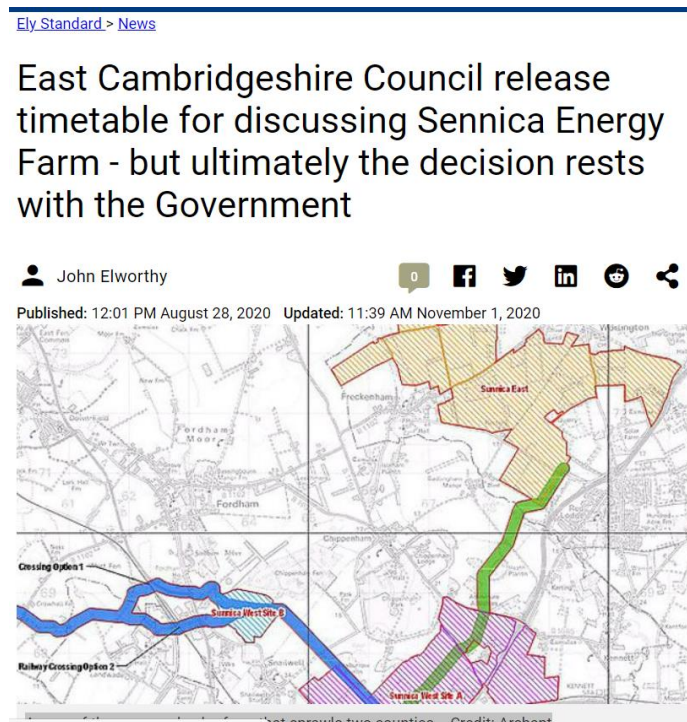


FIGURE 3 - PRESS ARTICLE

- 3.2.2. The article shows a different scheme boundary to the one proposed by Sunnica in the Statutory Consultation, causing confusion.
- 3.2.3. In the article, which included quotes from Luke Murray of Sunnica Ltd, it was stated that the scheme area covered 3 sites (yet 4 sites were presented during the Statutory Consultation). It was also stated that, “Villagers such as Isleham, Chippenham and Kennett are mainly affected with a cable route connecting to Burwell Electrical Sub

Station". The author of the article said that he had taken this information from the Sunnica.co.uk website. For such a significant project it was incumbent on the promoter to ensure that local media was correctly informed and briefed.

- 3.2.4. The scheme map and these statements are inaccurate and misleading.
- 3.2.5. This uncorrected press coverage, combined with the inadequate scheme descriptions presented by Sunnica Ltd, meant that residents in Isleham did not immediately recognise the direct impact that this scheme would have on them when they received their Consultation Booklet a few weeks after this article was published.
- 3.2.6. The land area surrounding Isleham was added late to the scheme (because of the landowner near Freckenham withdrawing from the proposal and being replaced by a landowner from West Row). The revised scheme boundary was not widely publicised nor updated on the Sunnica.co.uk website in a timely manner. The materials in circulation at that time were conflicting and confusing. As such we feel that the Statutory Consultation was prejudiced against the residents of Isleham. The first updated glimpse of the scheme was only presented when the Statutory Consultation began.
- 3.2.7. This issue was highlighted to Sunnica during the early consultation webinars, and it was thought that some additional consultation activity in Isleham might be forthcoming. But nothing happened.
- 3.2.8. A motion that was passed in July 2021 by Cambridge County Council stated that,

"It is disappointing that communities including Isleham were included late in the initial round of consultation, and that COVID restrictions in force at that time limited the nature of the consultation that could be undertaken."

Note: One of the non-statutory consultation meetings was held at the Beeches community centre in Isleham in 2019. However, this was poorly advertised and poorly attended, and the scheme at the time was sited further away from Isleham so the village was less impacted.

3.3. Poor Consultation Material

- 3.3.1. Residents reported how difficult it was to understand the maps etc in the consultation booklet, which was the primary form of consultation. The printed size was very small, maps were unclear/ difficult to read, no scale or scale bar was provided to assess size. It

was impossible for those trying to measure distances between the scheme boundary and their homes to obtain an informative answer.

- 3.3.2. Many of the maps in the booklet and on the website had no written markings or reference points, so the reader could not establish exactly which area was being shown. Context was lacking. None of the maps had a compass marking North, as is standard practice.
- 3.3.3. The plans on pages 9 and 11 of the booklets (example in Figure 4) are the only plans provided by Sunnica to indicate the proposed solar panel locations. But no settlement names or key features are shown, meaning that any reader would need to be a competent map reader to try to establish how the scheme related to them. The term ‘parameter plan’ is a technical term used in planning and would not communicate any significance to residents. An alternative title may have attracted attention rather than leaving the reader to work out what the plans represented.
- 3.3.4. Similarly, the maps shown in Figure 5 outlining the proposed BESS locations also have no place names or reference points. The BESS locations could be anywhere. Many residents did not realise the impact of the BESS compounds on them as a result.
- 3.3.5. Government guidance¹ on consultations sets out that consultations should use plain English and easy to understand and easy to answer. Lengthy documents should be avoided. The PEIR was a substantial document.
- 3.3.6. Small font size was used in the booklet, making it difficult for visually impaired residents to interpret. Had enlarged maps, with reference points on them, been on display in the village halls, ideally with experts available to help interpret them, these would have been much easier to follow.
- 3.3.7. In a CAG survey, residents were asked how easy it was to visualise the scheme based on the information provided by Sunnica. 67% said that it was difficult. A further 21% said ‘other,’ with reasons ranging from not having received a booklet (most common) or comments about the maps being tiny and difficult to interpret and the booklet containing “random pictures” and lacking important information and details.

1

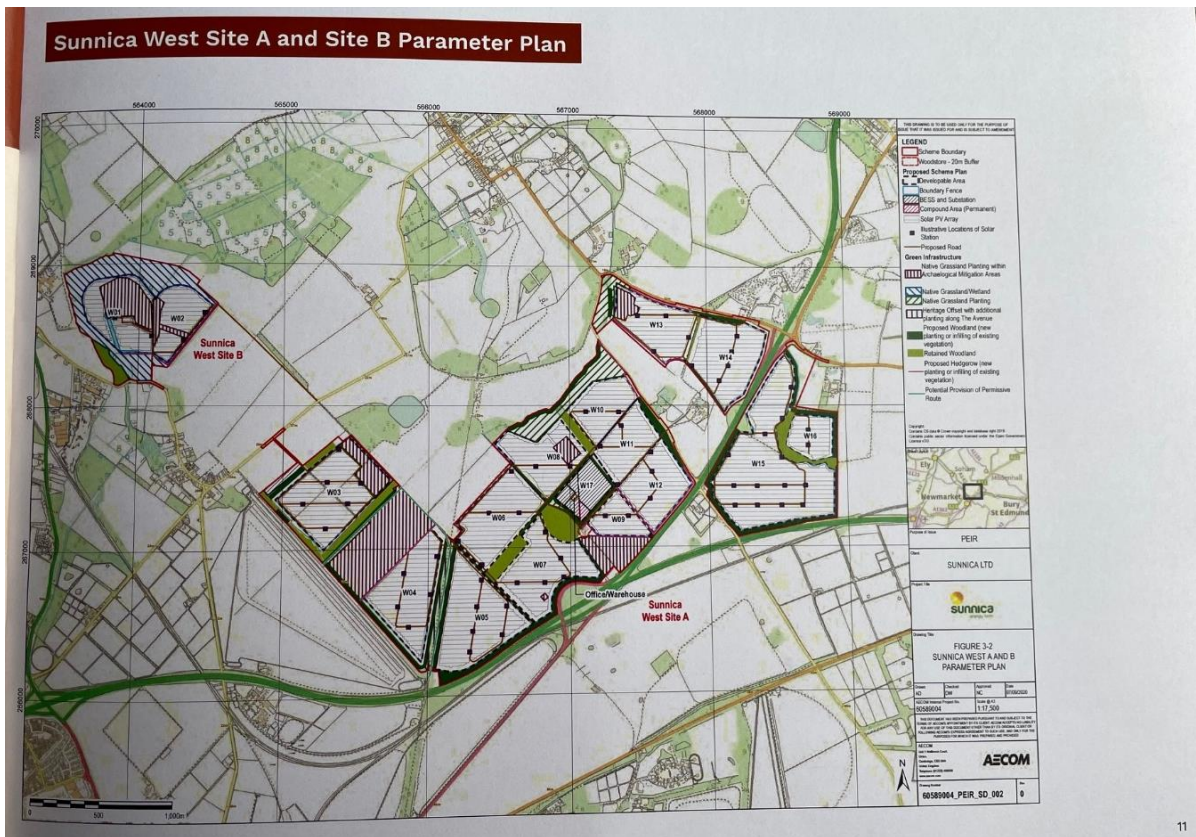


FIGURE 4 - EXAMPLE SITE PLAN

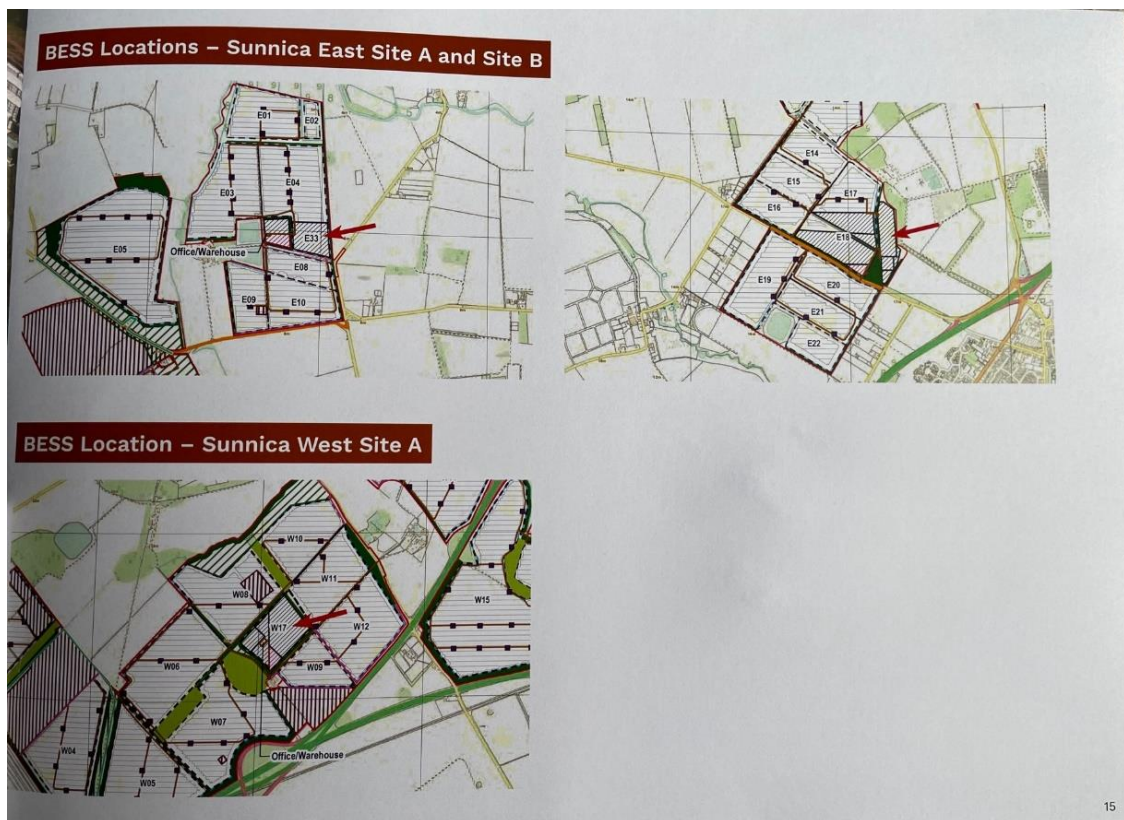


FIGURE 5 - BATTERY STORAGE LOCATIONS

- 3.3.8. Technical terms such as ‘parameter plans’ and ‘red line boundary’ repeatedly used throughout the material provided, but with no explanation as to what these mean. The booklets largely reproduced technical planning drawings and made no effort to use non-technical artwork easier for a lay person to understand. This made the material less accessible and less easy to understand.
- 3.3.9. Sunnica made further changes to the scheme boundary during the Statutory Consultation period and during the second national lockdown (5th Nov-2nd Dec 2020). These revisions were not made clear, causing further confusion about the scheme. Unconfirmed reports of changes to access points, changes/ closures public rights of way, etc spread around the villages. All of this was avoidable had Sunnica communicated more effectively with the parishes.
- 3.3.10. In June/July 2021, over 6 months after the Statutory Consultation had closed, residents of several villages contacted the CAG saying that they had received letters from Sunnica with scant details about potential compulsory purchase or compulsory access to their properties, causing considerable distress and confusion. These people proceeded to contact Sunnica to request additional details and to clarify their plans. In some cases, (e.g. a resident of Isaacson Road in Burwell) they received no reply from Sunnica and had to request their local MP to intervene on their behalf. In other cases, even when a response was received, insufficient detail was provided on which they could realistically feel ‘consulted’ about the impact to their personal property (e.g. Mr H of Chippenham). This is indicative of the lack of awareness of the scheme in the local communities, and the lack of communication and consultation with impacted landowners.
- 3.3.11. Landowners have a right to know the likely extent of compulsory purchase during the consultation, and approximately how much of the land has been secured by Sunnica and what is remaining. This also impacts the way that communities feel about the scheme, how realistic they consider it to be and ultimately how much time they devote to participating in the consultation.
- 3.3.12. Sunnica made multiple changes to the timelines for their application. Residents were told by Sunnica during the Statutory Consultation that they expected to submit their application to PINS in “Spring 2021”. This time passed and May 2021 was proposed. Because Sunnica omitted to keep residents up to date with these submission date changes, the CAG engaged with the local authority planning officers at this time to clarify

when the submission would be. They were told: early July 2021, then early September, then late September, 12th November and finally 18th November 2021.

- 3.3.13. These delays and lack of communication by Sunnica led to much confusion; residents started to assume that the scheme had already been granted approval. For example, in Burwell (one of the largest villages), people saw cables being laid (for other non-Sunnica projects) and work at the substation being carried out, which they assumed was the start of the Sunnica building work. Fields surrounding the other villages had excavators in place and trenches being dug – so people thought that the installation was already underway.
- 3.3.14. The local authorities also pressed Sunnica to engage with communities (e.g. planning officers stating in May 2021, “*We have encouraged Sunnica to update the community in respect of progress with their application preparation and we will continue to press them on this.*”). But this was not acted upon.
- 3.3.15. Eventually, Sunnica released an update leaflet late in August 2021 stating that the application would be submitted in Autumn 2021.
- 3.3.16. This lengthy delay and poor communication on the part of Sunnica has led to misinformation being circulated about the scheme and a feeling that it’s a ‘done deal’ and that residents no longer have a say. With the Covid-19 restrictions easing, Sunnica could easily have held a few update Q and A sessions in the villages to alleviate people’s concerns and ensure they were aware of the revised timings and what the next steps would be.
- 3.3.17. Even as recently as October 2021, Sunnica refused to engage with residents to ease this confusion. Two local MPs, Matt Hancock and Lucy Frazer, held a joint meeting in a local village hall and asked Sunnica to come along to answer questions. They declined. The MPs contacted them a second time, indicating that at least 200 residents were expected at the meeting (around 250 actually turned out), so it would provide an excellent opportunity to answer questions about the scheme. They declined to attend once again (Figure 6).
- 3.3.18. The headline of the article in Figure 6 accurately reflects the way that residents feel they have been treated throughout the entire consultation period, and even afterwards. Matt Hancock, called Sunnica out as being arrogant for not entertaining the idea that they needed to take part in community engagement.



FIGURE 6 - NEWMARKET JOURNAL OCTOBER 2021

3.3.19. Confusion about timelines was exacerbated by Sunnica not keeping its website updated with changes. As of November 2021, Sunnica had still not added the revised timelines that were indicated in their update leaflet from late August (i.e. submission in Autumn 2021). It still stated that the submission will be in Summer 2021 (which is contrary to "Spring 2021" shown on pg. 34 of the consultation booklet).

3.4. Inaccessible Information, Discriminatory Consultation, 'Missing' Consultees

3.4.1. Consultations on schemes of this size and scale should be made accessible to as many residents as possible. Not all residents in the affected areas received the consultation booklet. Sunnica stated that they had distributed around 11,000 booklets. However, the CAG had to contact Sunnica several times to request additional copies, as did several Parish Councils, to distribute to those missed by Sunnica.

3.4.2. There appears to be a discrepancy with the amount of booklets sent out by Sunnica. Based on census population estimates in Consultation Zone 1 (ca. 30,000), and using ONS average occupancy (2.4 residents per household), it could be expected that more copies should have been distributed. Sunnica claim to have written to 11,048 addresses which doesn't appear sufficient.

- 3.4.3. In a CAG survey of residents in Consultation Zone 1, 40% (229 of the 579 responders) said that they had *not* received a consultation booklet.
- 3.4.4. The SOCC established Consultation Zone 1 as being, “Any person or group likely to have a direct interest in the proposed Sunnica Energy Farm.” Yet this Zone excluded Newmarket and Mildenhall. These are significant population centres, of which a large proportion work in Zone 1 (especially true for the horse racing industry). Many from these towns also have a recreational interest in the area and travel through it routinely. Only in Zone 1 were all addresses written to.
- 3.4.5. The CAG is still being contacted by communities who have only just become aware of the scheme, almost a year after the Statutory Consultation closed. For example, residents of the site owned and permanently occupied by members of the traveller community, who live on Elms Road, adjacent to scheme boundary and the largest BESS site on Sunnica East B. This traveller site is well established (the owners applied for planning permission in 2017, which was granted) and well known in the area. It is impossible not to see the site from Elms Road. This community received no Statutory Consultation booklets and no details about the scheme. According to one district councillor, Sunnica relied on out-of-date records to establish residential areas, which could explain why this land (and other examples) was assumed to be unoccupied.
- 3.4.6. The travelling community has been unable to take part in any consultation at all, despite being significantly affected by the proposal and less than 200m from the BESS compound. They have the same rights as anyone living in a house.
- 3.4.7. The travellers wrote to planning officers on 18th Oct 2021 stating they had not been consulted about the Sunnica scheme. They had recently heard about it from a neighbour. On 5th Nov 2021, Sunnica put a stake in the ground at the end of the drive leading to the site, to which they had pinned a letter and a consultation booklet. They did not walk up the drive to meet with the community or to provide an outline of their plans. There was no time for meaningful consultation before the application was submitted on 18th November 2021.
- 3.4.8. We are aware of other public consultations in this region where there have been sites occupied by the traveller community. In these cases, developers wrote to each caravan plot number. Sunnica did not do this.

- 3.4.9. Another resident along Elms Road in Freckenham also contacted us stating that their home had been mistakenly classified by Sunnica as uninhabited/ unoccupied.
- 3.4.10. The Shores Trust, a local charity owning land impacted by the scheme, were also not properly consulted. Sunnica had been notified of the charity's address and ownership of the land by the board of Trustees. Instead of writing to their registered address, Sunnica, pinned a consultation letter the gate of their land outlining their interest in the land. The charity found this by chance and wrote to Sunnica, re-iterating that they had already provided Sunnica with their address and, in future, please could they write to them at that address instead of pinning notices to gate posts. Following this exchange, Sunnica did write to them at their registered address but still omitted to provide sufficient detail about their plans on which they could realistically be consulted.
- 3.4.11. Many people subject to this late round of consultation where alterations to highways and junctions for construction access were proposed, received only a small-scale plan showing the revised red line boundary. It was necessary to compare these with previous plans in the brochure to see the sometimes very small difference, but then be left not knowing what the difference was for. In some cases land was required for these changes.
- 3.4.12. Sunnica Ltd should have carried out research regarding the populations of the villages in their 'Consultation Zone 1'. This would have enabled them to recognise that a significant proportion are senior citizens (e.g. approx. 29% in Isleham, 27% in Worlington, 24% in Freckenham etc. *Source ONS*). A large proportion of these senior citizens either do not have access to a computer, or they are not very computer literate so were unable to access the online information or webinars. Indeed, in some areas around Isleham, there is currently no internet connection at all, so these residents were also unable to access the online information. The Covid-19 pandemic highlighted that there are many families here who do not have laptops/ computers (shown by the difficulties accessing home school work during the lockdowns). This is discriminatory against part of the population.
- 3.4.13. The CAG survey showed that 51% of residents were not aware of the additional information online or that they could not access it.

3.4.14. The Consultation Institute – Consultation Charter² sets out Best Practice for consultation. Among the seven core principles is *“Consultees must be able to have reasonable access to the exercise. This means that the methods chosen must be appropriate for the intended audience and that effective means are used to cater for the special needs of ‘seldom heard’ groups and others with special requirements”*. Also *“New technology and social media offers an ever-wider choice of consultation mechanism, but consultors must always ensure that the ‘Digital Divide’ does not disenfranchise citizens or stakeholders”*.

3.4.15. In view of this, the Sunnica Statutory Consultation booklet should have been supported not just by online information, but also by physical displays in the parishes (e.g. mobile displays or fixed displays in the village halls with enlarged maps etc), as indicated in PINS Guidance on procedural requirements for major infrastructure projects:

“Applicants should engage proactively with local authorities and local communities to find alternative means to provide access to the documentation where required, to ensure on-going fair participation in the planning process, for example by providing copies of documents on a USB flash drive where parties have access to a computer but have limited or no internet access or, where reasonably practicable, by making copies of documents available for inspection free of charge where a person is unable to access the documentation electronically or finds it difficult to do so.”

3.4.16. In-person meetings were possible in a Covid-secure manner during the first 6-7 weeks of the Statutory Consultation period, as evidenced by the farmers markets in Freckenham and Isleham, village neighbourhood plan consultations, etc. There are numerous large halls in community centres, sports hall etc in this area, so plenty of opportunity for ‘ticketed’ events with adequate social distancing could have been achieved. Or even outdoor events in the earlier weeks of the statutory consultation period.

3.4.17. Sunnica did not come to the villages at all during the Statutory Consultation, unjustly citing Covid-19 restrictions as the reason for this choice. Not only did the lack of any

²

h

physical meetings exclude members of the public who would have engaged with a physical consultation, but it also exacerbated the confusion surrounding the proposal.

- 3.4.18. Prior to the start of the Statutory Consultation period, district and county councillors asked Sunnica to come to the villages to answer questions, but they declined (Figure 7). Residents asked Sunnica several times during the consultation webinars to come to the villages, but they declined this too.
- 3.4.19. Comments made by Suffolk councillors during the Statutory Consultation period included, *“At this stage of the process we have many questions to which the answers are not entirely clear”* (Figure 8) and that *“impacts on highways and transport need to be evidenced more clearly.”* Residents and other key stakeholders cannot be expected to be consulted on impacts during construction and operation etc if there is so little information forthcoming.

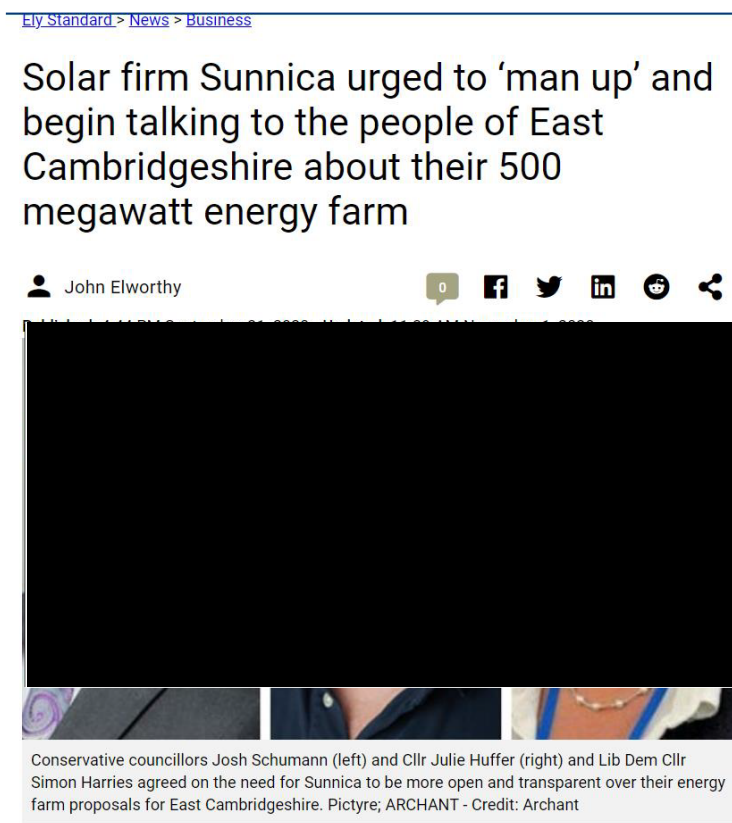


FIGURE 7 - ARTICLE ON SUNNICA NOT COMMUNICATING

- 3.4.20. Despite MPs, residents and local councillors asking Sunnica to come to the affected areas to talk to communities, they declined (Figure 8 and Figure 9)
- 3.4.21. This gave the impression that Sunnica felt they could inflict a scheme of this size and scale on local communities without adequately engaging with them. One district councillor

criticised *“the ‘cynical premise’ of Sunnica who, he felt, might not feel the need to consult locally since the decision was not being taken locally.”*

- 3.4.22. Not only has this caused much anger and upset, but it also set a prejudice in the villages that it was not worth participating in the consultation as their voice would not be heard.
- 3.4.23. Local MP, Matt Hancock, commented, *“We should make the case about not enough consultation having been done, notwithstanding whether you think this is a good idea or not.”*

“This will not be the case for residents of Worlington and Freckenham who have said that although they are not opposed to solar power they do not want to live inside a power plant.”

Councillor Rachel Hood added: “On behalf of West Suffolk residents I do want to highlight that the size of this proposal is monstrous.

“2,750-plus acres is completely inappropriate and the amount of solar energy that will be provided is a fraction of what would be provided if it was in a more suitable place, i.e. not in the middle of Suffolk that doesn’t get that much sunlight.”

The councils’ responses have called for more information on the impact it will have on climate change emissions, archaeological investigations required, mitigation for wildlife species, flood considerations and visual impact.

The responses said that the “assessment of impacts on the economy is flawed” while the “impacts on highways and transport must be evidenced more clearly”.

Suffolk County Council cabinet member for the environment, Richard Rout, said: “At this stage of the process we have many questions to which the answers are not entirely clear, so it’s appropriate at this stage to take these issues to the developer.”

He added: “The sheer scale of the project means its impact will be significant and very far-reaching.

[MORE: Villagers prepare to fight solar farm plans](#)“It’s our view that the largest solar project in the UK should take an exemplary approach to mitigating its impact on the landscape, so much more work is necessary.”

As a nationally-significant energy project, the government will make the final decision, with the development consent order expected to be submitted to the Planning Inspectorate from spring next year.

FIGURE 8 - EADT 11 NOVEMBER 2020

Growing concern from residents consultation about massive solar scheme set to surround villages just outside Newmarket is not good enough

By Dan Barker - dan.barker@iliffepublishing.co.uk

Published: 05:00, 29 November 2020

More news, no ads → [LEARN MORE](#)



There is growing concern from residents that a consultation into a 2,800 acre solar farm which will surround villages just outside **Newmarket** is not good enough.

Under controversial proposals from Sunnica, the sprawling facility will cross both East Cambridgeshire and West **Suffolk** and stretch from a substation in Burwell to Snailwell, Newmarket, Freckenham, Worlington and Isleham.

And now West Suffolk MP Matt Hancock, whose rural constituency will be changed for the next four decades if the plans are approved by his government, has told worried residents in an online meeting that if the proposals don't change, it should be opposed.

FIGURE 9 NEWMARKET JOURNAL 29TH NOV 2020

- 3.4.24. Another district councillor stated that Sunnica had not had any discussion with 3 of the Parish Councils in their ward (and within 'Consultation Zone 1') in the lead up to the statutory consultation, which contradicts claims by Sunnica in the SoCC (Figure 11 and 11) that Parish and Town Councils in Consultation Zone 1 would be engaged.

The ways in which our early engagement has influenced our approach to consultation include:

- Ensuring consultation activity includes Snailwell and Kennett
- Targeted advertising through the local press including adverts in the Ely Standard and East Anglian Daily Times
- Engagement with parish and town councils in the vicinity of the proposed Sunnica Energy Farm between periods of consultation
- Consulting with groups that have a particular interest in public rights of way such as The Ramblers and bridleways groups

FIGURE 10 SOCC ENGAGEMENT WITH PARISH AND TOWN COUNCILS

Table 3: consultation publicity and techniques

Zone	How we will publicise consultation within this zone	How we will consult within this zone
1	• Writing to all addresses within consultation zone 1 • Writing to elected representatives, <u>parish</u> councils and community groups within the zone with details of the consultation • Sharing a consultation information pack designed to support stakeholders promoting consultation through their own existing communication channels such as social media feeds with local authorities, parish councils and community groups within the zone • Publicising the consultation in the following newspapers circulating in the consultation zone: the Newmarket Journal, the Cambridge News, Bury Free Press, the Ely Standard and the East Anglian Daily Times. • Publicising the consultation via regional and local broadcasters including BBC Radio Cambridgeshire, BBC Suffolk, BBC Look East • Advertising the consultation on social media • Publishing details of the consultation online at www.sunnica.co.uk	• Sending a copy of a consultation booklet providing a non-technical overview of the proposed Sunnica Energy Farm, the BA process, the consultation and planning process, how to take part in the consultation, and proposed next steps to all addresses in consultation zone 1. • Inviting enquiries and responses online through the consultation website, by freephone, freepost or email. This will provide a variety of means for consultees to respond in a way convenient to them. • Hosting a virtual public exhibition on the consultation website. • Hosting webinars which will include a presentation regarding the proposals and an opportunity to ask questions. • Inviting elected representatives to take part in briefings through a digital meeting. • Inviting residents of consultation zone 1 to book an individual

14

FIGURE 11 SOCC LIST OF WHO WILL BE CONTACTED BY SUNNICA

- 3.4.25. Nicholas Wright a Parish Councillor for Chippenham confirms that his parish council did not have any specific approach by Sunnica to discuss any part of the scheme before, during or after the consultation period. Sunnica relied entirely on their brochures and website and did not meet with key stakeholders even virtually.
- 3.4.26. One further organisation, the Ark Church, based to the Southeast of Isleham, were not consulted. Neither as an organisation or members individually (congregation of around 400 people). The Ark Church is less than 400m from the proposed development and is a prominent building of architectural significance, in a setting significantly impacted by the development.
- 3.4.27. The Preliminary Environmental Impact Report (PEIR) was an essential part of the consultation since it contained more details about the proposal (the Consultation Booklet only gave a superficial overview of the scheme and, as such, did not enable people to assess the impact that it would have on them). The PEIR is listed in the SoCC as one of the items that Sunnica will be requesting views on (Figure 12). However, it was not made readily available to all.
- 3.4.28. Only those who were able to access the online consultation information were able to view the PEIR. Alternatively, those that could afford to pay over £315 to obtain a personal

copy (Sunnica asked for 35p per sheet; it's a 900+ page PEIR document). The charge was an obstruction to effective consultation as material that was deemed necessary by Sunnica to understand the proposals could only be obtained by paying for it.

- 3.4.29. Based on the population distributions of the affected parishes, this meant that around a quarter to a third of residents were unable to give their views on the PEIR, simply because it was inaccessible for those less computer literate or without computer access.

What will be consulted on?

During the statutory consultation, we will be asking for views on:

- The proposed Sunnica Energy Farm
- The short term and long term impacts of the proposed Sunnica Energy Farm including:
 - Construction impacts
 - Environmental impacts
 - Operational impacts
 - Impacts from decommissioning
- The PEIR

9

FIGURE 12 - PEIR LISTED IN SOCC FOR CONSULTATION

- 3.4.30. Recognising this omission, the Parish Councils requested that Sunnica provide hard copies of the PEIR to be made available in the villages. Sunnica were also asked to do this several times by residents during the early consultation webinars. This would have been a reasonable compromise to assist with effective consultation.
- 3.4.31. Sunnica responded slowly, first commenting in webinars that they would “look into” providing hard copies in villages and then indicating that they would supply them to the Parish Councils. By this time, several weeks of the Statutory Consultation period had elapsed.
- 3.4.32. Further confusion resulted in Parish Councils having to formally ask for PEIR copies, in addition to their previous requests during webinars. Three of these Parish Councils formally requested a hard copy of the PEIR by email and they received it. One further Parish Council requested a copy and sent several email reminders to Sunnica – they eventually received a copy in December just before the consultation closed. Two further Parish Councils that requested a copy did not receive anything. Other Parish Councils had assumed, based on Sunnica’s confusing comments during the webinars, that a copy of the PEIR would be sent to all Parish Councils in Consultation Zone 1, but this was not the case and they did not receive it.

- 3.4.33. In addition, where Sunnica did supply a hard copy of the PEIR, it was not a full version - just the main body of the document minus the appendices, which contained important details about the scheme. Government guidance is clear: relevant documents must be provided on request. The Appendices are relevant documents and they were not provided on request.
- 3.4.34. Given that the PEIR was (by Sunnica's own admission) such a vital part of the consultation it should have been made available, in full, in all towns and villages from the very outset of the Statutory Consultation period.
- 3.4.35. The inaccessibility of the PEIR was also reflected in a CAG survey. When asked, "*Were you able to access the information in the PEIR (preliminary environmental information report)?*", 91% of the 556 responses stated that they were unaware of the PEIR or unable access it. An extraordinarily high proportion of people were unaware of or unable to access key documentation. They have not complied with the SoCC.

3.5. Ineffectiveness of Webinars

- 3.5.1. The Sunnica online webinars were poorly advertised, and thus poorly attended. They were noted in small print on the back of the consultation booklet and in a small number of newspaper adverts (Figure 13). The newspapers chosen for advertising these were not always in the local area and are not so widely read by the local population here. In the modern age advertisements in newspapers, although required by law, are ineffective due to declining print readership. Other channels should have been used to advertise, not just the minimum required by law.
- 3.5.2. In a survey (Appendix 1) only 5% of respondents considered the webinars an adequate replacement of physical meetings and exhibitions. Some 60% of those surveyed did not attend the webinars.
- 3.5.3. No advertisements were placed on local village Facebook groups or in local village magazines, which are much more widely read and followed. A CAG survey indicated that 65% of 562 responders were unaware of the webinars. Social media users are highly likely to engage with online content, and the opportunity was lost to mobilise this group of the population.

- 3.5.4. Residents had to have access to a computer or device to register and, of course, listen to them. Previous comments in this report show that a significant proportion of residents here did not have these facilities and so were excluded from the webinars. Given that the webinars were to replace the dialogue that would normally take place in person, this gap was not effectively filled.
- 3.5.5. During the first series of 6 webinars, between 12-21 people joined. This is in stark contrast to the attendees of video conferences held by councillors and MPs during the statutory consultation period (over 100 attendees), and with the joint meeting by MPs Lucy Frazer and Matt Hancock in October 2021, when the village hall was packed with over 250 residents (more had expressed interest in going had it not been held during the working day). The overwhelming majority of residents here feel passionately about the impacts of this scheme on them, and this was not reflected at all in the webinar attendance.



FIGURE 13 - NEWSPAPER ADVERTISEMENT IN BURY FREE PRESS

- 3.5.6. Figure 13 shows an advert in the Bury Free Press. Bury St Edmunds is around 15-20 miles away from the scheme area, so adverts placed in this paper were not especially relevant to the affected communities.

- 3.5.7. The Statutory Consultation started on 22nd Sept 2020 but the first webinar did not take place until 1st October, over 1 week into the consultation period. This was followed by 5 further webinars between 3rd and 17th October. This first series of 6 webinars was then repeated.
- 3.5.8. During this timeframe, and up to 5th November 2021 (when the 2nd national lockdown came into effect), there was still the option of having face-to-face discussions in the villages, but Sunnica chose the webinars as their preferred way to consult.
- 3.5.9. Residents expected that the webinars would enable a two-way dialogue between Sunnica and the attendees. It was accepted that during such unprecedented circumstances, Zoom meetings and other video conferences provided a means of having a discussion. Unfortunately, Sunnica did not hold the webinars as a video conference. The format was complicated, comprising a presentation, followed by a Q&A session which was not 'live' in the sense that questions could not be asked directly to the presenters and receive a direct answer. Instead, questions had to be submitted in advance of the webinars or submitted via the 'chat' function during the webinar. A mediator collated the questions, in some cases grouping them together or paraphrasing incorrectly, so residents were unable to ask their questions directly. This prevented any dialogue or correction where the question was misunderstood or misrepresented.
- 3.5.10. Often, attendees waited to the end of the webinar (sometimes over 2 hours) to hear their question being addressed, only to find that their query was misinterpreted or insufficiently answered, but there was no opportunity to seek further clarification. Residents left the webinars feeling frustrated, and with far more questions than answers. They were ineffective.
- 3.5.11. Analysis of the three Q&A webinars showed that only 55% of the questions received a direct answer (Appendix 3). And of those questions that were answered, a large proportion of the response were inadequate or irrelevant.
- 3.5.12. Because there was no opportunity to engage in 'virtual conversation' with this complicated format, some attendees asked Sunnica if they could change the format to operate webinars as a two-way live video conference to improve the level of communication. This was important, as often one person's question can trigger other questions from other attendees and there is a better flow of information and engagement, leading to more comprehensive answers being obtained.

- 3.5.13. Sunnica declined this, saying that a more ‘open’ format of virtual meeting was not possible due to GDPR and persevered with their frustrating and flawed format. They seemed to be deliberately trying to disengage residents, and some that attended one webinar felt so frustrated that they didn’t attend others.
- 3.5.14. This GDPR statement is not true – two webinars were held locally in November 2020 for a local major transport scheme public consultation where participants could ask questions verbally and there was a two-way dialogue. Data protection requirements were upheld using this format.
- 3.5.15. In addition, many of the councils, local MPs, etc held meetings during the Sunnica consultation period using Zoom or other video conferencing software, and there was never any issue with GDPR since it is easy for people to log in anonymously should they prefer to do so. These were also well attended (over 100 people), compared to the poor attendance of the Sunnica webinars.
- 3.5.16. It could be expected during a consultation period that the number of webinar participants would increase as more residents became aware of the consultation. This was not the case with the Sunnica Statutory Consultation, in part due to the flawed format that Sunnica chose to pursue.
- 3.5.17. Attendance at the webinars as observed by the CAG is shown in the table below (note that many attendees were CAG members. The numbers include repeat attendees):

Time	Date	Topic	Attendees
18:00	01/10/2020	Introduction	12
14:00	03/10/2020	Sunnica East	21
18:00	08/10/2020	Sunnica West	14
14:00	10/10/2020	Grid Connection	13
18:00	15/10/2020	Environmental	18
14:00	17/10/2020	Construction	12
14:00	24/10/2020	Introduction	2
18:00	29/10/2020	Sunnica East	6
14:00	21/10/2020	Sunnica West	No Data
18:00	05/11/2020	Grid Connection	No Data
14:00	07/11/2020	Environmental	3
18:00	12/11/2020	Construction	No Data
19:00 - 20:00	18/11/2020	Q&A 1	26
19:00 - 20:00	25/11/2020	Q&A 2	44 (Peak)
19:00 - 20:00	02/12/2020	Q&A 3	No Data

- 3.5.18. The sequence of webinars was repeated but without changing the time, such that the 18:00 webinar on 08/10/2020 on Sunnica East would, for example, run at 14:00 (instead of 18:00) on 29/10/2020 to catch people who might not have been able to see it the first time.
- 3.5.19. Residents' time was wasted during the webinars, which were categorised into different topics. The first introductory portion (approx. 20 mins) of each webinar was repeated on each session, so attendees had to sit through the same presentation multiple times before getting to the part they were interested in. This led to frustration at not being able to get to the information they wanted to assess the impact. This 'standard introduction' could have simply been pre-recorded and made available, allowing more time for the specific topic matter to be discussed and, importantly, the Q&A.
- 3.5.20. Splitting the webinars into subjects resulted in reduced consultation time. Those wishing to hear more on a given topic had to wait until the necessary presentation before they could obtain further information about this. And if they weren't available to attend the webinar on the date on which their topic of interest had been scheduled, they had to wait for the recording to be uploaded before they could listen. But this meant that they were unable to ask questions as it was no longer live.
- 3.5.21. Additionally, the webinar recordings took an unnecessarily long time (sometimes over 2 weeks) to upload to the Sunnica website. The sound quality was also poor in some cases. One of the webinars had a technical fault, so only a partial recording was available.
- 3.5.22. The presentations on the various topics could have been pre-recorded and made available from the outset of the consultation period. The format chosen by Sunnica did not allow maximum time for residents to engage with the consultation, nor to listen to the topics at their convenience and formulate questions, which Sunnica could then have responded to in a simple two-way Q&A video conference.
- 3.5.23. The whole webinar process maximised frustration, restricted access to subject matter, and provided confusing and contradictory information to that presented in the written materials.
- 3.5.24. Attendees asked questions that were pertinent to the proposals. These were about sourcing of the PV panels and raw materials, and about use of local labour in construction. These questions were not answered as Sunnica deemed them to be the responsibility of

an un-named funder. But Sunnica Ltd are the developer, they are the applicant for the DCO, and upon whom obligations in the DCO are binding. Webinar attendees concluded that Sunnica were not interested in obligations and were simply fronting an unknown third party who was the actual decision maker.

3.6. Missing, Misleading and Conflicting Information

3.6.1. The online consultation material was confusing and lacking in detail in areas. 41% of residents who responded to a CAG survey found it difficult to navigate. Comments about the virtual information included:

- insufficient detail provided about the scheme
- difficulty trying to toggle between webpages to pull information together
- insufficient details on maps etc to assess the exact locations, no markings or reference points on some of the maps, so it was difficult to see where the locations were meant to be
- no search function meaning that the viewer had to know what they were looking for to find it.
- no overall summary or FAQ style area directing residents to the areas of the website that might help them navigate better, no cross referencing to help users make connections between maps on different pages etc

3.6.2. The online format was not readily accessible to less confident computer users and, as such, was excluded a large portion of the local communities.

3.6.3. Visualisations of the scheme were not available in the consultation booklet or online at the outset.

3.6.4. Sunnica were asked by residents several times about providing visualisations. They were reluctant to provide these at intervals other than after 1 and after 15 years. Residents felt that more were necessary to enable them to visualise the impact of the scheme over the course of the first 15 years. Sunnica stated that they were just conforming to industry practice, so they only had to provide the minimum required.

- 3.6.5. After further requests for visualisations from webinar attendees, Sunnica eventually placed visualisations of the scheme on the website only. No additional examples were provided using other formats to accommodate those without access to the website.
- 3.6.6. Those that were eventually provided were very difficult to interpret. Figure 14 shows a “View west from PRoW (footpath) W-257/002/X – Type 4 visualisation Year 15”.
- 3.6.7. To establish where this is, the user needs to try to find another map somewhere on the website (no cross referencing was provided), and then try to find PRoW number W-257/002/X and then toggle back to this photo to try and see where it is and what it might look like in 15 years’ time. This is not presented in a non-technical format.
- 3.6.8. This is incredibly confusing and time consuming and does not readily allow people to visualise how the scheme might appear. This is a key part of being able to assess the impact on them.



FIGURE 14 - EXAMPLE OF CONFUSING PHOTOMONTAGE

- 3.6.9. The visual impact map on pg. 24 of the consultation booklet is “modelled on substation heights of max 8.5 m.” But it is not clear which substations these are. It is not clear if this refers to the BESS units (which on pg. 14 are said to be 6m high), or the Burwell substation expansion or the solar stations – but in the PEIR this height is given as 12m.
- 3.6.10. There is also reference to 10m high “electrical compounds” (Figure 15) but again it is not clear what these are.

- 3.6.11. This confusing information prevents a true assessment of the visual impact of the scheme during construction/operation. These are significant structures, so warrant careful explanation of what they are, where they will be and how they will most likely look.

Sunnica Energy Farm
Preliminary Environmental Information Report
Volume 1: Main Report (Chapter 10: Landscape and Visual Amenity)

- The solar arrays would be set within an aluminium frame and mounted on a steel rack. The panels would be angled with their highest edge 2.5m above ground level and all panels would be fixed in a south facing orientation and would not rotate to follow the sun;
- The invertors, switchgear and transformers would also be 3m in height and the solar stations would be 3.5m in height;
- The battery energy storage system ('BESS') would be 6m in height;
- The electrical compound would include substations which are 10m in height (with Burwell Sub-station extension at 12m) and control buildings which are 6m in height;
- The proposed landscape design would consist of a native grassland beneath the panels and in areas of ecological enhancement or archaeological mitigation. This grassland would not have fully established at year 1.
- Proposed new native hedgerows would be between 0.6m and 0.8m in height with tree planting between 1m and 3.5m in height dependant on available plants and natural variation in heights;
- All new planting (the 'Green Infrastructure') as per the preliminary the Parameter Plans would be implemented and managed in accordance with the Outline Landscape Ecology Management Plan ('OLEMP'), a draft version of which is included within **PEI Report Volume 2: Appendix 40**

FIGURE 15 - EXTRACT FROM CHAPTER 10 OF PEIR

- 3.6.12. A considerable amount of information was either not provided, or left unanswered, during and after the Sunnica consultation. Many of these points were outlined in the joint response by the 4 local authorities affected by the scheme – a 79 page document detailing well over 500 items of missing details (see link to the full report under Section 4, 'References'). This includes fundamental information that allows residents to assess the impact of the scheme on them during construction and operation e.g.:

- Not marking existing solar farms on the consultation maps, making 'cumulative impact' impossible to assess.
- Not declaring the approximate number of solar panels until pressed to do so by multiple residents' questions during the consultation, and then only indicating that there could be around 1.1 million solar panels to the 14 residents who listened to the webinar in which this was discussed (3rd Webinar 8/10/2020). This is a vast number of solar panels. These kinds of estimates must be made available to all consultation participants to allow them to appreciate the scale of this scheme. The panels arguably have the broadest impact and cannot be excluded from the consultation.

- Not providing any indication about the impact of the loss of ca. 2500 acres of highly productive vegetable growing land for at least 40 years, and how this shortfall in local food production could be made up. Nor did Sunnica provide adequate information about how this will affect the local agriculture-related economy; which is key to this area. When questioned about this during webinars, Sunnica simply replied by saying, *“We will need to find other land to farm.”* This is not an adequate answer to loss of such a large amount of highly productive farmland. This lack of information does not allow the residents here to assess the impact of the scheme during operation and how losses will be compensated.
- Sunnica also incorrectly stated in the PEIR that the land in this area is predominantly grade 3b and 4, which residents (many of whom have worked in agriculture in this area for years) know not to be true (see Appendix 2 – Sunnica site with ALC grading). There are large areas of grade 2 land, which are not mentioned by Sunnica.
- Sunnica did not explain how or why they have ‘downgraded’ the land. They also omitted to inform residents that the land is irrigated and capable of growing a wide range of vegetable crops (which would not be consistent with grade 3b and 4 land). Consultees reading this were misled about the quality of the soil, and their opinions and expectations of the agricultural potential of the land would have been incorrect.
- When asked by residents and local authority planning officers to provide evidence of their soil classification, Sunnica declined. Sunnica eventually disclosed the data on their agricultural assessments to local authorities in August 2021 after repeated requests, but not to local residents. This is not the spirit of consultation– not with local residents nor with local authorities.
- Not declaring information about disruption/ damage to roads/ footpaths/ bridle ways or construction noise/ pollution. Residents of Burwell who live near a newly constructed solar farm on Factory Road described the construction noise from continual piling and drilling as unbearable, and that it had prevented them from being able to be outdoors for several months. According to Sunnica’s booklet, they do not anticipate *“any significant noise effects from construction,*

operation or decommissioning.” This is highly unlikely and contradictory to local experience, and warrants further engagement to clarify.

- No details at all regarding other sites that were considered for the scheme and why the proposed area was chosen to be more suitable above these. This would have enabled a better understanding of why the scheme needs to be designed as it is, and in the area it is. MPs also wrote to request more information about alternative sites, but Sunnica chose not to divulge this, simply providing an overview of the process they had followed but not specifying alternative sites that were considered as part of this process.
- No details about how the anticipated output/ efficiency of the proposed scheme compares with other technologies so that people could establish the value of the Sunnica proposal to compare with the impact it will have on them.

3.6.13. Sunnica did not willingly cooperate during the consultation or put themselves in a more favourable light with residents/councillors/MPs/planning departments etc during this process.

3.6.14. Details regarding BESS were particularly scant, which did not allow residents to understand the implications that the BESS storage compounds would have on them.

- Sunnica did not declare the likely battery technology, so did not allow residents to gauge battery safety, a crucial part of the impact during construction and operation given the known fire hazards of commonly used BESS technology (e.g. Li-ion). They did not declare the expected electrical capacity of the BESS to permit a rough idea of the scale of the operation.
- Not declaring the approximate number of battery energy storage containers and the approximate dimensions of these. Misleading images were depicted in the brochure of battery sites showing just 9 containers (Figure 16). However, the CAG estimates that there will be around 100 containers of batteries on *each* of the potential 3 sites. An image showing a battery compound with 10x more containers than the chosen image would have been more realistic. No visualisations of the BESS sites or substation expansion were provided. In addition, the aerial view of a the smaller facility in Figure 16 does not help the reader to assess the impact from ground level. These are some of the largest and tallest structures in the scheme and will have the most widespread visual impact. Residents did not feel consulted on the BESS aspect of the proposal at all.

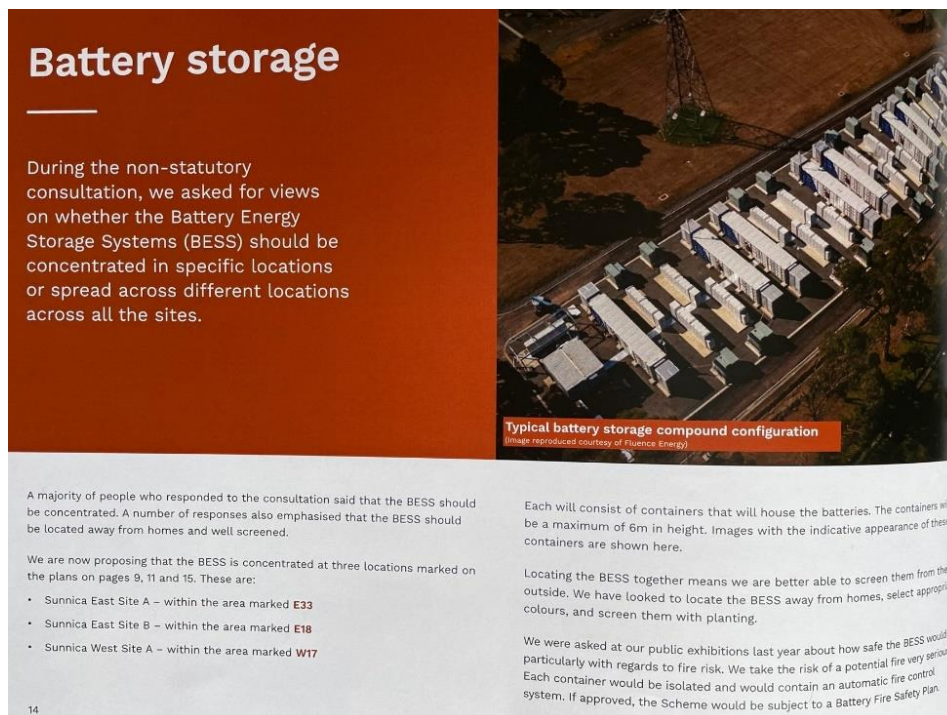


FIGURE 16 - IMAGE OF 'TYPICAL' BATTERY COMPOUND

3.6.15. Misleading and conflicting information about the purpose of the BESS. They were portrayed in the non-statutory consultation materials as being for the storage of the energy derived from the Sunnica solar panels (Figure 17).

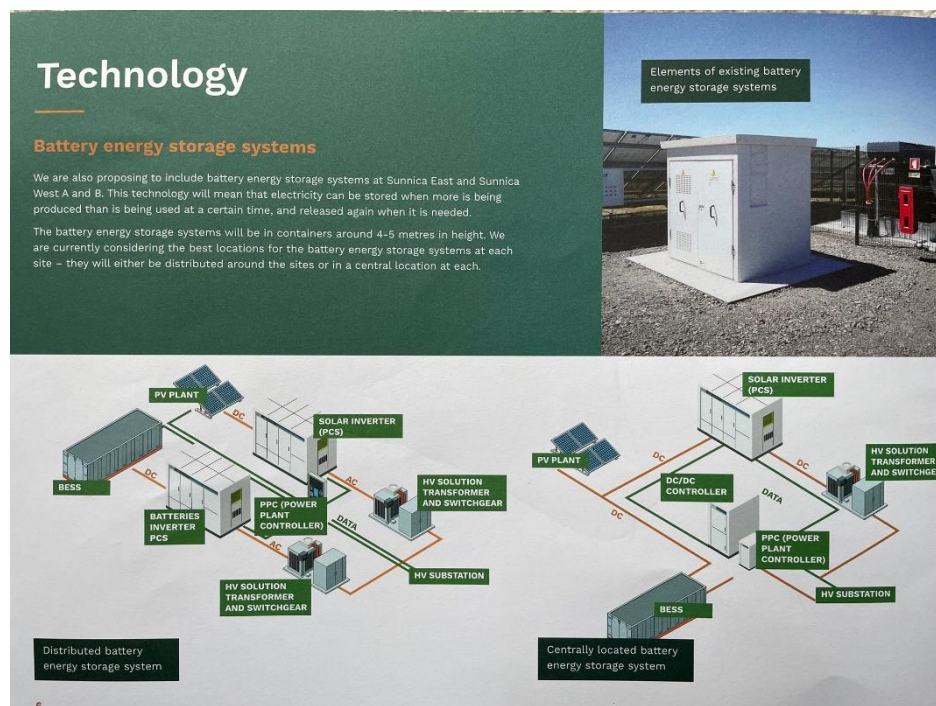


FIGURE 17 - BESS INFORMATION IN NON-STATUTORY CONSULTATION BROCHURE

- 3.6.16. However, a different use of the BESS was described by Sunnica during one of the late statutory consultation webinar Q&A sessions (18th Nov 2020, attended by 26 people). In this webinar they described how the BESS were to be used for energy trading and explained that this entailed drawing energy from the Grid (energy from all fuel types – solar, wind, and even fossil fuels, etc.) when there is a surplus and then selling it back to the Grid at a higher price when demand is higher.
- 3.6.17. This was not clear in the public consultation booklet or website; indeed, it was not stated exactly what the BESS were for (Figure 18). The way the information was presented in the booklet, adjacent to a section on PV technology, meant that any reader might reasonably conclude that they were simply part of a solar generation facility. But it seems this may not be the case. This is a significant omission. It changes the nature of the entire scheme and requires full consultation so that all residents are aware of this potential additional use of the BESS (not just the 26 people who attended the webinar).



FIGURE 18 - BESS IN STATUTORY CONSULTATION BOOKLET

- 3.6.18. This prejudices those who would only consent to the BESS for the purpose of storing the Sunnica solar energy to smooth out demand/supply but would not accept BESS as part of a fossil and other energy trading scheme. It implies that the BESS is an integral and necessary component of solar energy generation, when in fact it is not. Given knowledge of the size of the BESS compounds, their imposing size, and that they are to some extent a separate scheme, the response to consultation may have been different.

- 3.6.19. An energy trading operation is a separate enterprise and should be indicated as such. It is very different to the 'usual' solar farms that operate in this area (which do not have large scale BESS).
- 3.6.20. If the Sunnica proposal is truly intended as an energy trading facility, residents have been denied consultation on this significant additional aspect of the scheme and this needs to be corrected.
- 3.6.21. Sunnica also implied that they had acted on views from the non-statutory consultation regarding the BESS – that they were concentrated and sited away from peoples' homes (Figure 19). This has not happened. The proposed BESS locations described in the Statutory Consultation material are very close to peoples' homes. This is misleading.

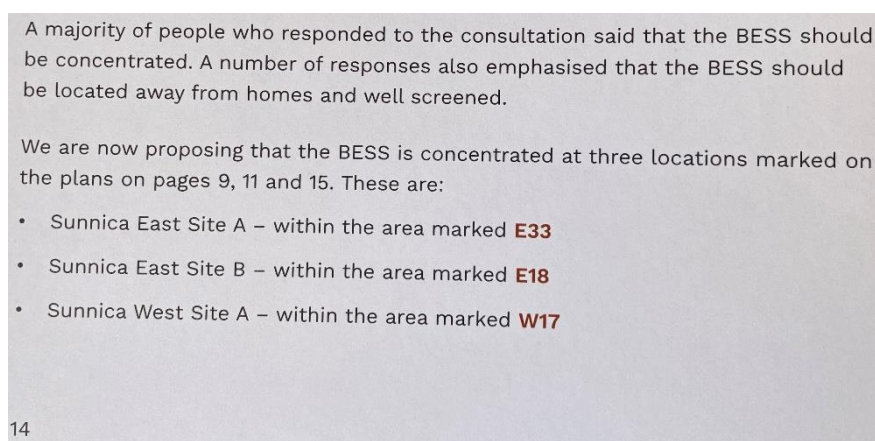


FIGURE 19 - DESCRIPTION OF BESS LOCATION IN BROCHURE

- 3.6.22. Local authorities were provided with a scheme description of a solar farm with *potential* BESS storage. But the Sunnica consultation booklet and website made no mention of these being an 'option', but rather a given. This has caused more confusion, as no plans have been issued to indicate what the scheme would entail if BESS were not included.
- 3.6.23. During the non-statutory consultation and in the webinars Sunnica maintained a position that the agricultural land in the area was poor, and non-productive. This conflicts with the experience of many local people that the land is productive farmland. It also conflicts with available information that much of the scheme is on land with a significant likelihood of being Best and Most Versatile land. Requests to carry out a soil survey to establish an independent assessment of land classification were refused and access to land was prevented.

- 3.6.24. A plan of the area is provided in Appendix 2. This shows the boundary of the Sunnica scheme overlaid on a plan showing the classification of land. It can be seen that the majority of the proposed scheme lies in areas of Grade 2 and Grade 3 land (Best and Most Versatile land). Readers of the consultation materials have likely been misled about the quality of the land, and thus may not have truly assessed the impact of the scheme during construction/ operation.
- 3.6.25. There are many, many more examples of the missing and conflicting information that are considered important in assessing the impact of the scheme. Ranging from an absence of highways details (how the scheme sites would be accessed for construction and impacts on roads, footpaths, bridle ways etc during/ after construction) to likely compulsory purchase/ access and archaeological/ heritage impacts to a lack of detail about adverse impact on wildlife.
- 3.6.26. Indeed, on pg. 19 of the consultation booklet, Sunnica only comments about habitat loss as being the main impact on wildlife. They then move on to comments about creating new habitats, but do not mention that these will predominantly be created *after* the scheme has been constructed. This does not allow the reader to truly assess the impact, as they would not necessarily appreciate that there is a gap in available wildlife habitats during the construction period, and until the newly created habitats may be established.
- 3.6.27. In the webinar dated 15th October 2020 Sunnica admitted that there would be “loss of species”. This was not indicated in any written consultation materials. In a rural area, rich in wildlife, and with many local nature-lovers and wildlife experts and enthusiasts, loss of species as a result of the scheme is a significant impact. These residents were misled by the written materials and not allowed to assess the true impact during construction/ operation/ decommissioning.
- 3.6.28. Decommissioning is another key area that Sunnica specifically said they would consult residents about, and it was included in their SoCC (Figure 20). Almost no details were provided on decommissioning, as indicated by the brochure extract in Figure 20. When asked about decommissioning in the webinars, Sunnica deflected and said that details would be in the Decommissioning Environmental Management Plan. When asked to see a draft Sunnica said this would not be put together until 6-12 months before decommissioning takes place.

Decommissioning

The Scheme would be designed for an **operating life of at least 40 years**. Once the Scheme reaches the end of its operating life, it would be decommissioned in accordance with a decommissioning plan that will need to be approved as part of the DCO. This would involve, for example, removing the solar panels and BESS and **restoring the land to its previous condition**. This means farmland will not be permanently lost as a result of our proposals. The solar panels and batteries would be recycled at this stage.

Decommissioning is expected to take between **12 and 24 months to complete**.

Sunnica Limited would have a **legal responsibility** throughout the operational life of the Sunnica Energy Farm to ensure that it complies with the DCO and all other relevant legislation and regulations.

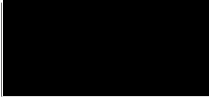
FIGURE 20 - BROCHURE SECTION ON DECOMMISSIONING

- 3.6.29. Sunnica stated in their Statement of Community Consultation that they would consult on “Impacts from Decommissioning” (Figure 12). However, as no details were provided on decommissioning apart from a very brief statement, devoid of impacts, consultation on this subject has not been achieved.
- 3.6.30. Unhappy with the level of information provided by Sunnica, residents wrote to local MPs asking them to seek clarification from Sunnica on decommissioning (and other matters), but they also received a similar response (Figure 21). There is no detail – not even in draft form - of how decommissioning will be undertaken, who will be responsible, etc. No guarantee that all materials will be recycled, no guarantee that components would not go into landfill (and create another environmental hazard). No indication of likely cost, etc. Residents have therefore not been consulted on decommissioning and have not been able to assess the potential legacy that will be left behind once the scheme comes to an end.
- 3.6.31. The consequence is that there has not been effective consultation on decommissioning. The Planning Inspectorate is being asked to examine a scheme that will be in place for over a generation, with details of its decommissioning to be worked out after it has been consented.

A Decommissioning Environmental Management Plan (DEMP) and a Decommissioning Resource Management Plan (DRMP) will be prepared and implemented to manage the decommissioning of the Scheme. These will be produced at least six months prior to decommissioning and will be secured by the DCO ensuring that Sunnica delivers on the commitments it makes in respect of decommissioning.

The DRMP will detail the management of resources during decommissioning, including the planned destinations for reuse, recycling or landfill of materials at the time of this occurring. During all phases of the Scheme, the Waste Hierarchy will be adopted to ensure that reuse and recycling of all materials is prioritised. Section 16.7 of Chapter 16 Other Environmental Topics in the PEI Report provides further details.

The Decommissioning Environmental Management Plan will detail the mitigation measures to be adopted by the contractor during decommissioning so as to prevent and / or minimise effects on a



range of environmental parameters during decommissioning. It will be similar in format and function as the CEMP, which will be followed by the contractor during construction. An Outline CEMP has been produced and is provided in Appendix 16C of the PEI Report, which is an example of the type of document that will be produced.

FIGURE 21 - EXTRACT FROM LETTER TO LUCY FRAZER MP

- 3.6.32. Misleading and confusing statements about Sunnica having a legal responsibility throughout the operational life of their Energy Farm, which contradicts their comments in later webinars (e.g. Q&A webinar dated 18/11/2020) that they may sell on the DCO if it was granted and that ownership would not be the same throughout the operational life of the scheme.
- 3.6.33. Sunnica's likely intention to obtain the DCO and sell it on as a speculative opportunity should have been highlighted in the consultation material. Some people may have been reassured by statements in the material from the organisation that they believed would also operate the scheme for the 40 year duration. They may view the impact of the scheme differently if they thought it might change hands several times in its' lifetime, and therefore provide uncertainty in relation to who is responsible for the scheme during construction, operation, and decommissioning.

- 3.6.34. Excessive use of ‘The Rochdale Envelope’ throughout the consultation process. Sunnica used this concept in order to provide insufficient details on which residents could be consulted. The Rochdale Envelope principle expects applicants to state the ‘worst-case scenario’ of many relevant factors for public consideration i.e. environmental impact, safety, etc.
- 3.6.35. Worst-case scenarios were *not* provided by Sunnica – just an omission of any detail. Consultees need further consultation so that these details, or ‘worst-case scenarios’ may be considered.
- 3.6.36. As stated in the Planning Inspectorate’s guide to using the Rochdale envelope ([Advice-note-9.-Rochdale-envelope-web.pdf \(planninginspectorate.gov.uk\)](https://www.planninginspectorate.gov.uk/advice-note-9-rochdale-envelope-web.pdf)),
- “the assessments should be based on a cautious ‘worst case’ approach”
and the level of information required should be:
 - “sufficient information to enable ‘the main,’ or the ‘likely significant’ effects on the environment to be assessed.”
- 3.6.37. This has not been adhered to during the Sunnica Statutory Consultation. Only an absence of any detail about batteries, alternative sites, decommissioning, and more.
- 3.6.38. The Rochdale envelope guide also states that:
- “The need for ‘flexibility’ should not be abused - this does not give developers an excuse to provide inadequate descriptions of their projects.”
- 3.6.39. Residents, councillors, and MPs alike consider Sunnica’s descriptions to be inadequate.
- 3.6.40. An example of the uncertainty in Sunnica’s plans can be heard during their webinars
[REDACTED] This clip includes multiple references to the PEIR, which was not accessible to all.
- 3.6.41. Misleading and inaccurate statements in the Statutory Consultation booklet that the scheme had been made ‘smaller’ by Sunnica following feedback from the non-statutory consultation. The scheme boundary changes were due to a landowner in Freckenham withdrawing his land from the scheme, and Sunnica seeking alternative sites. The gap was filled by a landowner from West Row, who offered an area of land around Isleham. This culminated in the previous single site near Freckenham being replaced by two ‘smaller’ sites. But this addition made the impact even greater, as it required an additional cabling

route to connect the patchwork of solar sites together and surrounded even more villages. These areas, being added so late to the scheme, were disadvantaged from the outset from being effectively consulted, as previously outlined in this report.

- 3.6.42. Other 'reductions' and 'amendments' that Sunnica implied as being made following community feedback were also not entirely truthful. Some of the changes in land use within the scheme boundary that were outlined in the late August 2021 update leaflet had to be made because of archaeological/ wildlife findings from their surveys. Not necessarily as a result of listening to community feedback.
- 3.6.43. Misleading images throughout the consultation booklet, showing panels of around 1.5m high (e.g. Figure 2). Lack of transparency regarding the scale of the scheme in acres/hectares (around 2500 acres), so residents were unable to assess how it compares to the solar farms in this area, which typically range in size from 25-200 acres. This needed to be highlighted by Sunnica as many residents had no concept of this from their first impressions of the brochure. If approved, this would be the largest solar plant in Europe at the present time. But this is not mentioned anywhere in the brochure, website or in the SoCC.
- 3.6.44. In the SoCC Sunnica merely stated that the scheme is a NSIP that exceeds 50 MW (Figure 22). But it doesn't state by how much. 500 MW is a significant leap from 50 MW, and is much greater from what local understanding of a 'typical' solar farm output is (operational solar farms in this area are between 5 and 38 MW). The purpose of a public consultation is to draw attention to the public to what the scheme involved but this was not clear.

The planning process

We are developing the proposed Sunnica Energy Farm under the Planning Act 2008. This is because its proposed generating capacity exceeds 50 megawatts (MW), which means that under the Planning Act 2008 the Sunnica Energy Farm constitutes an NSIP requiring a DCO.

Unlike planning applications, which are considered by local authorities, DCO applications are made to the Planning Inspectorate (PINS). This independent body administers the application process on behalf of the relevant Secretary of State. In this case, the appropriate government department is the Department for Business, Energy & Industrial Strategy (BEIS). Further information on the DCO application process can be obtained from PINS Advice Note 8: Overview of the nationally significant infrastructure planning process for members of the public and others. A link to the document is here: <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2013/04/Advice-note-8.0.pdf>

FIGURE 22 - EXTRACT FROM SOCC

3.7. Inadequate Advertising, Insufficient Time for Review, Lack of Responses

- 3.7.1. The Statutory Consultation started during an escalating Covid-19 pandemic and included a 4-week period of national lockdown, followed by a period of restricted movement. Sunnica only extended the consultation period by 16 days, which could not compensate for the lengthy time that people had to limit their movements and access to information. The overall consultation time was insufficient given that it was held during a pandemic.
- 3.7.2. In addition, during this time, many consultees, or organisations that residents contacted to ask for advice/ additional detail to assess the impact of the scheme were either closed or running on limited staff. This resulted in lengthy time delays getting responses. Residents consequently ran out of time to add these points into their consultation response and to their assessment of the impact.
- 3.7.3. Lack of response by Sunnica to questions submitted by residents and Parish Councils alike – either written questions from letters and emails or those submitted during webinars (as previously outlined in this report). As an example, Freckenham Parish Council is still awaiting a response to their non-statutory consultation comments, as well as written questions submitted by email to Sunnica on 15th July 2020 and 21st September 2020, prior to the Statutory Consultation. Residents also submitted questions via email, which also went unanswered.
- 3.7.4. Sunnica were also slow to reply to written questions during the Statutory Consultation. Telephone calls were left with the promise of a call back, which never came. For example, the CAG called to ask about alternative options for providing access to the PEIR in the villages. The Sunnica representative said they would discuss and call back, but they never did. It was all very unsatisfactory and prevented residents from being able to understand and assess the impact of the proposal within the allocated time.
- 3.7.5. Instructions on how to book an individual appointment to speak to a member of the Sunnica staff was located on the back of the consultation booklet, in small print. The use of small font sizes was raised by a Parish Council, as this discriminates against those with visual impairment. A statement at the front of the booklet in larger font, or in other advertising, would have been more effective in ensuring appointments were accessible to those who needed them.

- 3.7.6. Councils also informed the CAG that they had been given insufficient time to consider the Statement of Community Consultation (from 3rd Aug-1st Sept 2020) during the pandemic. Not only was this released during the summer holidays, but effective consideration by Officers was difficult to achieve with staff illnesses, remote working, etc.
- 3.7.7. Consultation notifications in local newspapers were inadequate. These were written in the small print at the back of newspapers that were not so widely read (e.g. Figure 23). No advertisements were placed in local village publications (which are hand delivered to every household), or the town/village community Facebook groups. These would have been far more effective. We have made the point previously that, in the modern age, local newspapers are in decline and although notice publication in local papers is a legal requirement, it is not effective.
- 3.7.8. Sunnica stated during one of their webinars that they ran a paid Facebook campaign resulting in 'several thousand' page impressions – but the village community Facebook groups did not see any posts, so it is unclear if these 'impressions' were seen by the intended recipients.
- 3.7.9. The nature of the advertisements that Sunnica ran in local newspapers was ineffective (Figure 13). Very small white text on a dark background, making them difficult to read. In addition, the same inadequate description for the scheme was used in these (Burwell in Cambridgeshire) as discussed previously, meaning that many residents (especially in Suffolk) would not have paid much regard to these.

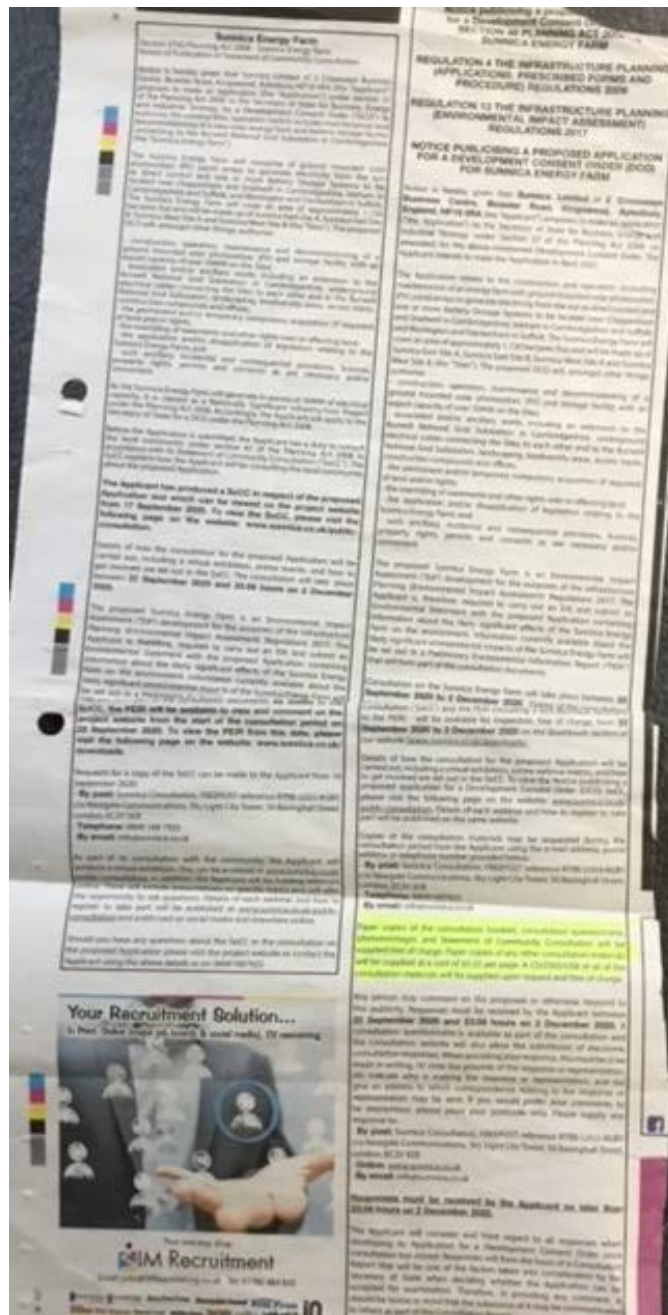


FIGURE 23 - NOTICE IN NEWMARKET JOURNAL

- 3.7.10. Initially, there was no physical advertising in the form of posters/ banners in the villages. Banners are required by West Suffolk Council's Statement of Community Involvement as "Line of sight publicity." Adoption of local authorities Statements of Community Involvement is recommended by Advice Note 2 from the Planning Inspectorate, Section 5.3:

“A local authority’s adopted Statement of Community Involvement (or Community Involvement Scheme in Wales) is likely to have a bearing on its response to the developer’s SoCC Consultation.”

- 3.7.11. Freckenham Parish Council requested a banner for each village in Consultation Zone 1 as a written question to the Parish Councils Alliance briefing by Sunnica on 21st September 2020 (the evening before the Statutory Consultation started).
- 3.7.12. One single banner was eventually sent to each Parish Council in late October/early November – mid way through the consultation. An example is shown in Figure 24.
- 3.7.13. More banners/ posters were needed to advertise the consultation, and these should have been in place in the lead up to the consultation starting, not part-way through.
- 3.7.14. By the time the banners finally arrived and were put in place there was a second national lockdown, meaning that residents were not moving around the villages, which significantly reduced their effectiveness.



FIGURE 24 - BANNER PROVIDED BY SUNNICA

- 3.7.15. The consultation dates changed from 22 Sep-2nd Dec 2020 to 22 Sep-18th Dec 2020, but the banners were not updated. This led to confusion as many people were unaware that they had an additional 16 days to respond to the consultation period. They thought they had missed the deadline to respond when in fact this had changed.
- 3.7.16. The lack of effective advertising limited the awareness of the consultation, which was reflected in the lack of engagement in online activities such as the webinars, as outlined in section 2.5.

3.8. Consultation Response Receipt/Tracking

- 3.8.1. Consultation responses that were submitted via Sunnica's paper questionnaire were not traceable. The questionnaires were not numbered or coded, so there was no way of gauging gaps in responses or issuing receipts to confirm they had arrived at the Sunnica address. There was no way of obtaining any statistics on the number of responses compared to the numbers of questionnaires distributed.
- 3.8.2. For example, Kennett and Snailwell were highlighted in the SoCC as villages that had not previously been engaged consultation. But there was no way of assessing how many paper responses were returned from Kennett or Snailwell unless the responder divulged their location details (which was optional).
- 3.8.3. Consultation responses submitted via the online questionnaire also had no confirmation of submission or acknowledgement of receipt. The sender had no indication that their consultation responses had been sent and did not receive a copy of the online responses they had submitted, which would have been helpful for future reference.
- 3.8.4. Responders complained that they were unable to check that their responses to all sections of the questionnaire had been received.

4. Conclusion

- 4.1.1. Sunnica has not complied fully with their Statement of Community Consultation.
- 4.1.2. Local people were not given access to information to enable them to consider the proposals fully. Information that was provided was in some cases incorrect and biased in favour of Sunnica (agricultural land classification). Pertinent questions in the webinars were deflected and alleged to be the responsibility of an un-named third party, the funder. People who thought they were talking to the future holder of obligations, found they were not.
- 4.1.3. The nature of the BESS was concealed. It was not clear that this could also be an energy trading scheme, and that the BESS were for storing energy (from renewable and non-renewable sources) from the grid, not just smoothing PV generation.
- 4.1.4. There was excessive reliance on postal address information, excluding anyone who did not have a postal address, or may have had the misfortune to live in a newly built property. Some properties that were occupied were deemed unoccupied. There was a lack of due diligence on the part of Sunnica.
- 4.1.5. Even where Sunnica had contact details they posted a letter by nailing it to a gate. And then, when asked for further information, did not provide details.
- 4.1.6. Many people who were not directly impacted during the statutory consultation found that they were at a later stage impacted by changes to access routes and road/junction widening. They were sent small-scale plans showing just a red line boundary, but no details of what their land was required for, or if this was permanent or temporary.
- 4.1.7. People found at a late stage that they were at risk of compulsory purchase for improvements for access routes. They were not properly consulted, only sent a small-scale plan showing the red line boundary with no information on the works proposed.
- 4.1.8. There was no consultation on decommissioning as set out in the Statement of Community Consultation. No details were provided of how this would be achieved or secured.
- 4.1.9. When asked in our survey 93% of respondents did not feel they had been consulted properly. Some 44% had heard about the scheme by word of mouth, and only 60% had received a consultation booklet. These were people living in Zone 1 who were all supposed to have received a direct mailing.

- 4.1.10. Only 35% of respondents were aware of more information being available on the Sunnica website. Of those that did access the website only 7% found it easy to find information they were looking for.
- 4.1.11. Some 67% of people found it difficult to visualise the proposals from the information provided. 58% of people said they could not understand the scheme properly, 49% were unable to ask questions to help them understand it, and 50% were unaware of the impact upon them.
- 4.1.12. The consultation cannot be considered adequate and consequently we ask the Planning Inspectorate to reject the application at this stage.

5. References/Media articles

- Joint Response to Statutory Consultation by 4 host authorities:
<https://democracy.westsuffolk.gov.uk/documents/s39360/Sunnica%20Statutory%20Consultation%20Response.pdf>
- East Cambridgeshire District Council planning meeting 2nd Sept 2020. Sunnica proposal discussed at 2 hours. [East Cambridgeshire District Council, Planning Committee 2nd September 2020 - YouTube](#)
- West Suffolk Councillor comments about the consultation being ‘farcical’ (3.01 minutes) 7th Dec 2020. [Say No To Sunnica - YouTube](#)
- Ely Standard Newspaper article 21st Sept 2020: [‘Man up’ and start talking energy firm told](#)).
- East Anglia Daily Times article 11th Nov 2020 with comments from several Suffolk County Councillors regarding inadequate consultation
[REDACTED]
[REDACTED]
- Freckenham Parish Council complaint letter to Sunnica on 9th Oct outlining concerns about the consultation. Sunnica declined to offer additional support for most of the concerns raised [REDACTED]
[REDACTED]
- Consultation not good enough. Report in Newmarket Journal 29th Nov 2020
[REDACTED]
[REDACTED]

Appendix 1 – Summary of CAG Survey Results

We undertook a survey of local residents to capture their views on the adequacy of the Sunnica consultation.

Method

Paper copies of the survey were distributed in villages located within Sunnica's 'Consultation Zone 1' (taken from the SoCC)

The survey was also made available online using Survey Monkey.

The link to the online version was distributed within Consultation Zone 1 via village Facebook groups, as well as

Parish Council Facebook pages and through leaflets and village newsletters that were in circulation at that time.

Responses

Overall, there were 600 responses. This comprised 112 from the paper survey and 488 from the online survey. The responses are summarised in Table 1

TABLE 1 CAG SURVEY RESPONSES

Q1 Are you aware of the Sunnica solar and battery proposal?

<u>Response</u>	<u>Online</u>	<u>Burwell paper</u>	<u>Non-Burwell paper</u>	<u>Total</u>	<u>Percentage</u>	
Yes	485	76	23	584	97%	
No	3	13	0	16	3%	
Total	488	89	23	600		

Q2 How did you first find out about the Sunnica scheme?

<u>Response</u>	<u>Online</u>	<u>Burwell paper</u>	<u>Non-Burwell paper</u>	<u>Total</u>	<u>Percentage</u>	
Word of mouth	209	30	14	253	44%	
Received information directly from Sunnica Ltd	73	11	4	88	15%	
Online	64	5	1	70	12%	
Local media	80	18	3	101	17%	
Other	58	8	0	66	11%	
Total	484	72	22	578		

Q3 Did you receive a Sunnica Consultation Booklet?

<u>Response</u>	<u>Online</u>	<u>Burwell paper</u>	<u>Non-Burwell paper</u>	<u>Total</u>	<u>Percentage</u>	
Yes	297	36	17	350	60%	
No	187	36	6	229	40%	
Total	484	72	23	579		

Q4 Were you aware of the same, and more, information on the Sunnica website (Sunnica.co.uk)?

<u>Response</u>	<u>Online</u>	<u>Burwell paper</u>	<u>Non-Burwell paper</u>	<u>Total</u>	<u>Percentage</u>	
Yes	180	13	6	199	35%	
No	299	51	16	366	65%	
Total	479	64	22	565		
Q5 Were you made aware of the size/ acres/ hectares of the Sunnica scheme (over 2700 acres/ 1100 hectares)?						
<u>Response</u>	<u>Online</u>	<u>Burwell paper</u>	<u>Non-Burwell paper</u>	<u>Total</u>	<u>Percentage</u>	
Yes	251	16	11	278	49%	
No	231	49	11	291	51%	
Total	482	65	22	569		
Q6 Are you aware that the Sunnica scheme will take this area out of productive (arable) agricultural use for at least 30 years?						
<u>Response</u>	<u>Online</u>	<u>Burwell paper</u>	<u>Non-Burwell paper</u>	<u>Total</u>	<u>Percentage</u>	
Yes	305	37	18	360	63%	
No	181	29	4	214	37%	
Total	486	66	22	574		
Q7 – Did not concern the consultation						
Q8 A number of matters were not included in the Sunnica Consultation Booklet, or few details were given.						
Which of these do you consider important matters? (tick all that apply)						
<u>Response</u>	<u>Online</u>	<u>Burwell paper</u>	<u>Non-Burwell paper</u>	<u>Total</u>	<u>Percentage</u>	
Selection of the area chosen for the scheme	391	48	20	459	80%	

Locations of existing solar farms already in this area - Within a 15 mile radius of the Sunnica scheme area there are already 11 solar farms operational, 9 more under/awaiting construction (as of June 2021).	386	49	18	453	79%	
Computer generated imagery of the visual impact of the scheme, including at different intervals (e.g. 1, 10 and 20 years)	344	41	16	401	70%	
Use of the land after 25 years (possibly up to 40 years) of use by the scheme	404	44	20	468	82%	
Guarantees of scheme removal and return to it's previous agricultural use once ended (and after no more than 40 years)	388	41	20	449	78%	

Road and lane widening through villages to accommodate the scheme	413	46	20	479	83%	
Footpath/ bridalway/ public right of way closures	427	50	20	497	87%	
Compulsory purchase/ leasing/ access of residents' land and property	411	51	21	483	84%	
Size, capacity and technology of the Battery Energy Storage Systems	407	49	20	476	83%	
Noise impact	n/a	42	18	60	61%	
Impacts on existing wildlife / ecology	439	55	20	514	90%	
Heritage and archaeological impacts	377	50	20	447	78%	
Total	475	76	23	574		
Q9 From the information provided by Sunnica in their Consultation Booklet, how easy was it for you to visualise the impact of the scheme?						
Response	Online	Burwell paper	Non-Burwell paper	Total	Percentage	
Easy	54	6	2	62	11%	
Difficult	319	40	14	373	67%	
Other	101	13	6	120	22%	
Total	474	59	22	555		

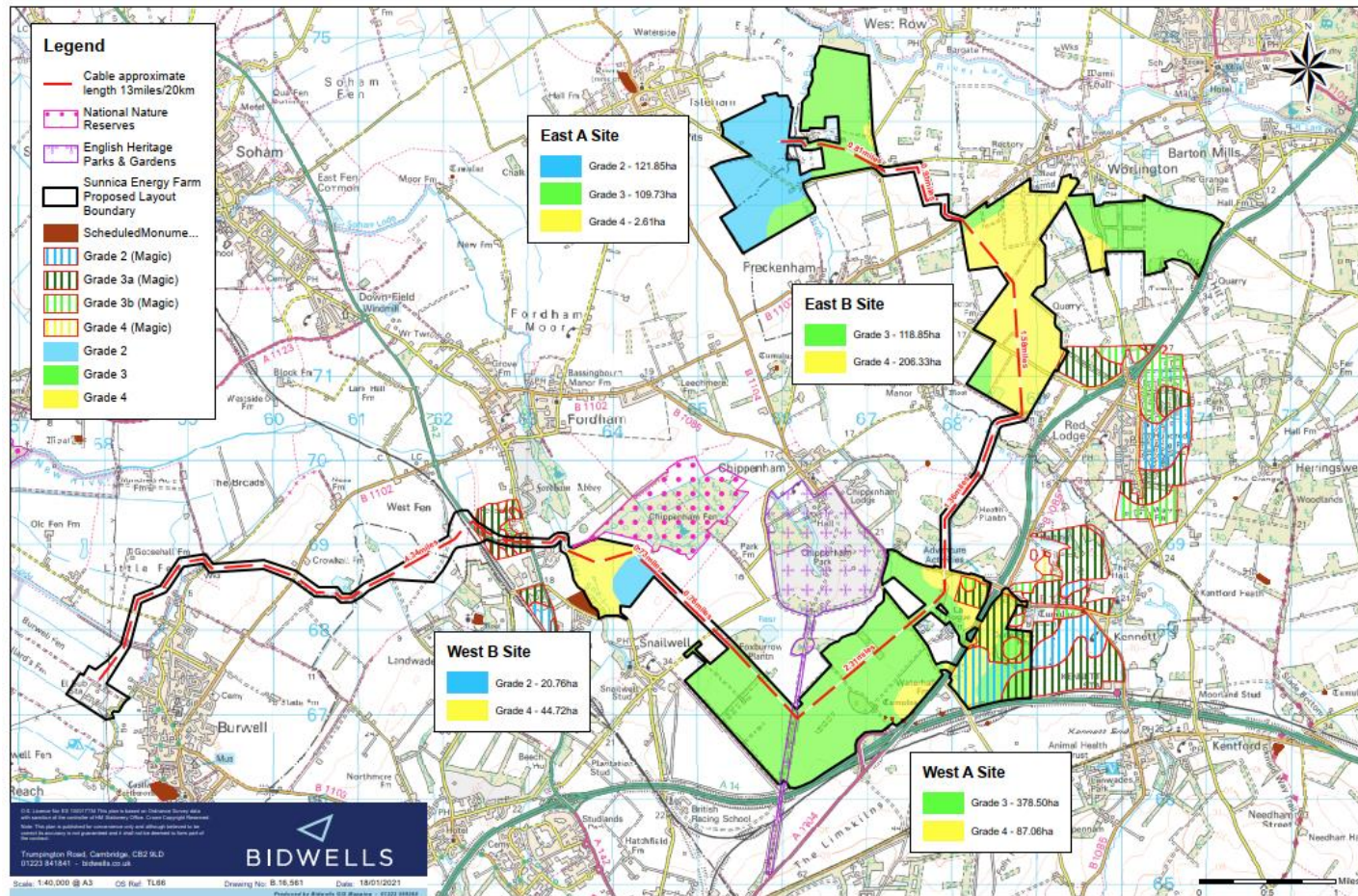
Q10 If you accessed the online information on the Sunnica.co.uk website, how easy was it to find the information you were looking for?						
<u>Response</u>	<u>Online</u>	<u>Burwell paper</u>	<u>Non-Burwell paper</u>	<u>Total</u>	<u>Percentage</u>	
Easy	36	0	0	36	7%	
Difficult	186	7	6	199	36%	
Did not access the website	220	41	15	276	50%	
Other	29	6	2	37	7%	
Total	471	54	23	548		
Q11 Were you aware of the webinars that were held by Sunnica?						
<u>Response</u>	<u>Online</u>	<u>Burwell paper</u>	<u>Non-Burwell paper</u>	<u>Total</u>	<u>Percentage</u>	
I was unaware of the webinars	301	49	15	365	65%	
I was aware of the webinars but did not attend them	117	10	2	129	23%	
I attended some/all of the webinars	64	0	4	68	12%	
Total	482	59	21	562		
Q12 What is your view of the webinars? (tick all that apply)						
<u>Response</u>	<u>Online</u>	<u>Burwell paper</u>	<u>Non-Burwell paper</u>	<u>Total</u>	<u>Percentage</u>	
The webinars were an adequate replacement of physical meetings and exhibitions in villages	24	2	3	29	5%	

The webinars were not an adequate replacement for meetings/exhibitions in villages	162	6	6	174	32%	
I was able to ask questions and receive adequate answers about the scheme	8	0	1	9	2%	
I was unable to ask questions about the scheme	38	1	3	42	8%	
I was able to ask questions but did not receive adequate answers	38	0	1	39	7%	
I did not attend the webinars	297	27	6	330	60%	
Other (please specify)	62	6	6	74	13%	
Total	451	76	23	550		
Q13 Were you able to access the information in the PEIR (preliminary environmental information report)?						
Response	Online	Burwell paper	Non-Burwell paper	Total	Percentage	
Able to access	46	3	0	49	9%	
Unable to access	67	10	6	83	15%	
Unaware of the PEIR	368	40	16	424	76%	
Total	481	53	22	556		

Q14 In terms of statutory consultation what effect did the absence of meetings/ exhibitions or information displays in villages have on you? (tick all that apply)						
Response	<u>Online</u>	<u>Burwell paper</u>	<u>Non-Burwell paper</u>	<u>Total</u>	<u>Percentage</u>	
I could not understand the scheme properly	289	27	15	331	58%	
I was unable to ask questions about the scheme	240	26	14	280	49%	
I was unaware of the impact of the scheme on me	251	28	10	289	50%	
It had no effect on me	40	3	1	44	8%	
Other (please specify)	35	5	3	43	7%	
Total	475	76	23	574		
Q15 What effect did the Covid-19 restrictions and national lockdown have on your understanding of the scheme? (tick all that apply)						
Response	<u>Online</u>	<u>Burwell paper</u>	<u>Non-Burwell paper</u>	<u>Total</u>	<u>Percentage</u>	
I was unable to be consulted properly	318	29	15	362	63%	
I was unable to attend meetings in villages	268	17	10	295	51%	
It had no effect	72	13	2	87	15%	
Other (please specify)	24	3	1	28	5%	
Total	475	76	23	574		

Q16 Overall, do you feel that you were adequately consulted about the impact of the scheme?						
<u>Response</u>	<u>Online</u>	<u>Burwell paper</u>	<u>Non-Burwell paper</u>	<u>Total</u>	<u>Percentage</u>	
Yes	39	1	1	41	7%	
No	446	66	21	533	93%	
Total	485	67	22	574		

Appendix 2 – ALC land classification within Sunnica Scheme



Appendix 3 - Analysis of November 2020 Webinar Q+A Sessions

The three Q+A webinar sessions were analysed with the following summary of responses:

Question Answered	133
Asker Referred to PEIR	11
Question will be answered later	32
Question not answered or deflected	67

Out of 243 questions, only 133 (55%) received a direct answer.

The questions asked and the response given (in summary) were as shown in Table 2. Where a question is deemed answered this does not imply the answer was acceptable, only that it was answered. Question to be answered later mostly referred to the DCO, but in some cases it might be at a later stage (construction or decommissioning)

The answers given by Sunnica are abridged and not verbatim. They communicate the essence of the answer given which, in some cases, may have been longer.

TABLE 2 - SUMMARY OF QUESTIONS AND ANSWERS IN Q+A WEBINAR SESSIONS

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
Are Sunnica still looking for Land?	Q+A 1	x				No
Can you tell us what E23 is?	Q+A 1	x				Proposed area of Solar near Worlington
Were other sites considered for the BESS and why were they not accepted?	Q+A 1			x		Will be produced in DCO
Please explain the BESS's and the connection at Burwell?	Q+A 1	x				About currents and inverting etc - technical
Have La Hogue pulled out?	Q+A 1				x	Conversations on going and private
What is the minimum viable size for Sunnica?	Q+A 1				x	"Confidential"
Will you disclose your business case?	Q+A 1				x	Upfront capital expenditure, Operational cost and potential revenues (mention 500 MW connection) (weekly commercial calls of people wanting to get involved)
Have you made it an NSIP to avoid local involvement? (lumped 3 smaller sites together)	Q+A 1	x				The size makes it an NSIP
How does Boris's wind promise effect Sunnica?	Q+A 1	x				Solar is part of the energy mix. Reality is the wind doesn't always blow
We have Great Crested Newts in Worlington - has this been noted?	Q+A 1			x		Yes and surveys on it will be published in DCO
Are you intending to import electricity from the national grid?	Q+A 1	x				We will, allowing us to offer a suite of grid balancing services.

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
Why can't we have a consultation where I can talk to people?	Q+A 1	x				Covid – you can phone us
We will need an evacuation for the primary school because of BESS's?	Q+A 1			x		Preparing a battery energy fire safety management plan (BEFSMP). (Claims large BESS's are widely used and experienced)
How high are the BESS's?	Q+A 1	x				Up to 6m
Can you list what is still undecided through the Rochdale envelope?	Q+A 1		x			Doesn't list them
Can you list the alternative sites?	Q+A 1			x		Will be in the DCO
Is solar not named by Boris because it isn't that green?	Q+A 1	x				Solar is bankable and everyone can get behind it
How long will it be before the carbon footprint of construction will be offset by the scheme?	Q+A 1				x	Haven't calculated this at this point but have calculated total energy generation and life cycle gas emissions.
Some of your substation schemes is going to be 8.5m high, 50m wide and 75m long? (Substations)	Q+A 1		x			Trying to limit that as much as possible but that is Rochdale envelope
Are the batteries just storing energy from Solar?	Q+A 1	x				No also from the electricity grid.
How many substations are there? And in which of the 4 areas?	Q+A 1		x			4 electrical compounds. Burwell, East site A and B and West site A
How will you ensure there is no child labour in the Cobalt you use?	Q+A 1				x	Don't want to support child labour so will take care when procuring its

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
						materials, but actually up to the funder
Do any of you live within 5 miles of the proposed site?	Q+A 1	x				No
Will batteries be double stacked? Are you worried about the risk to Red Lodge?	Q+A 1	x				No double stacking and BEFSMP
Can we have an updated image of La Hogue Road at 15 years?	Q+A 1				x	Confused about the question
Who is paying for decommissioning?	Q+A 1				x	The scheme will by setting aside security at some time through the scheme overseen by an independent but can't say when or how much
Is it true if the scheme goes ahead you can use CPO the land associated with cabling but not Solar panels?	Q+A 1	x				Aiming to reach voluntary agreements but CPO is available if DCO - can use CPO on ALL land
How many solar panels will be used?	Q+A 1				x	Not known
What changes have you made so far to the scheme as a result of resident's feedback?	Q+A 1	x				Scheme changed due to pre-consultation, also Landscape design (listened to local feedback)
Have RAF Lakenheath and Mildenhall been consulted yet?	Q+A 1	x				Luke says he 'thinks' they have been consulted. Danielle says they have spoken to MoD on behalf of them.
How few solar arrays will you need to ensure that energy trading Battery storage will be sufficiently profitable?	Q+A 1				x	Combination of a lots of things, complex relationship.

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
Does Sunnica now speak for the prime minister? (re previous question about Boris's commitment to wind)	Q+A 1	x				No they don't - Matt Just knows a lot about renewables
What will be the battery capacity storage at Burwell? Do you own the grid connect secured? Will you be buying electricity from the grid at Burwell?	Q+A 1	x				No installed capacity at Burwell Substation in relation to Sunnica's generating station. They have a bilateral connection agreement though, Yes, they will be buying but it is complicated.
IS Solar as effective as wind?	Q+A 1	x				Solar is very predictable and bankable
Have you found out the distance from schools to the BESS's?	Q+A 1				x	All about the fire safety plan. Closest schools (of 8) - 0.8 miles is the closest "well within a safe distance". But won't be their decision.
Can animals run beneath the panels? Will there be sheep?	Q+A 1	x				Sunnica's decision and yes they would like sheep
Are you planning east and west solar panels?	Q+A 1	x				Planning south facing solar panels
Is it possible to have the BESS without the panels?	Q+A 1	x				The dominant technology here is the solar panels- the batteries are a supporting system
Would schools need an evacuation plan?	Q+A 1	x				Don't think so but in BEFSMP if they need one
What extent of the battery capacity finalised?	Q+A 1				x	
Will the aspiration of grid balancing lead to an increase in proposed battery storage?	Q+A 1				x	

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
How big is the largest battery in the world and what is ours in reference?	Q+A 1				x	Doesn't know, but isn't the largest proposed in the UK
What proportion of the battery storage will come from the Solar and what will come from the grid?	Q+A 1				x	Will evolve
Why shouldn't we postpone the consultation until it is OK to meet?	Q+A 1	x				Don't want to wait, they believe this is an appropriate way of consulting
What are the transport routes around Freckenham?	Q+A 1				x	
The fire safety plan should be published for us to see and comment and when will it be available?	Q+A 1			x		An outline is drafted
What kind of explosion would you expect from the batteries?	Q+A 1				x	Not a mushroom cloud
Will you be selling off the site after securing the DCO?	Q+A 1				x	"Irrelevant" will set out a funding statement, but not going to commit to anything but it will be invested in and owners today won't be the same throughout
Can you partially bury the 6m high battery storage systems?	Q+A 1	x				Have chosen not to
Why are the number of batteries and their capacities not listed?	Q+A 1			x		Rochdale envelope
How can we consult effectively without info?	Q+A 1	x				They have provided "a lot of information"

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
Why won't you let us see the alternative sites? I don't see any harm in providing this	Q+A 1			x		This is what they have chosen to do, and they don't have to provide it
You didn't answer about the Schools evacuation plan.	Q+A 1	x		x		BEFSMP
If granted can you please guarantee me that all grass management will be done by sheep grazing as Matt said? Also that tractor mowing will not be used (Concern over wildlife in the grass).	Q+A 1	x				Will be in a management plan but no - cannot commit to just sheep.
When you calculated the greenhouse gas assessment did you include the environmental impacts of mining of lithium and Cobalt?	Q+A 1	x				Yes
Would you all prefer Sunnica or a nuclear plant on your doorstep?	Q+A 1	x				Sunnica - no longer pesticides and intensive farming - Luke was also shocked and worried about Chernobyl
Your previous answer about carbon offsetting wasn't good enough- Surely you must have a rough idea of your carbon offsetting otherwise how do we know it is green?	Q+A 1				x	The scheme calculates the carbon offset saved instead
Should it not be on a low value site not a high-value site?	Q+A 1				x	We don't assign a value the site, but think it is appropriate - it is up to the Secretary of state
When will the public be able to see the results of the consultation period?	Q+A 1	x				DCO

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
Can we see the fire service response to the batteries?	Q+A 1			x		
Will the lithium come from ethically sourced mines? Can you ensure this?	Q+A 1	x				They "would like to avoid non-ethical sources" of these products. Household names and they are trying to ensure they are sourced responsibly. Standard needs to be met by funder, not them.
It sounds like the batteries will store power from dirty sources?	Q+A 1	x				Essentially yes
Will you be taking in power from the Solar panel schemes around burwell, if so do you need more panels?	Q+A 1				x	
Please can you explain the updates in the boundary changes? And the loss of some otherwise protected areas at Chippenham Fen?	Q+A 1	x				Notified people about them and changed for access reasons
Fire safety plan needs to be produced before the application.	Q+A 1			x		Not a static thing, will change.
So it is not green after all, you will be storing energy from fossil fuels?	Q+A 1	x				Yes
Will the cables you are leaving in the ground after decommissioning degrade and how long will it take?	Q+A 1	x				Made of metal, don't know how long decomposition will take
If Sunnica goes bankrupt will there be funding for decommissioning?	Q+A 1				x	There will be a security at some point

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
I suggest it is 2.4 million panels is this correct?	Q+A 1				x	Won't know till final design, after application
Capacity of the three substations bar Burwell?	Q+A 1				x	Don't know
Is there a skeletal framework for the decommissioning environmental management plan?	Q+A 1				x	Produced much later in the scheme (5 years before decommissioning maybe)
Did the original red line alter because of the withdrawal of a landowner?	Q+A 1	x			x	Based on feedback
Will you provide drone footage of the site?	Q+A 1	x				Not for public consumption
Will you be providing information on battery safety and volatility to USAF Mildenhall?	Q+A 1			x		US bases will get an opportunity to comment at a later point
Where will you be sourcing water from?	Q+A 1				x	Exploring at the moment, Land owners reservoirs and Anglian Water are suggestions
Have you taken into account the importing of food which would have been grown on this land?	Q+A 1	x				No they haven't
Will this scheme be a precursor for other schemes across East Anglia, considering it is considered only moderately effective?	Q+A 1				x	
Matt is totally wrong to say Solar is totally predictable	Q+A 1	x				Solar is about light, and the sun comes up and goes down.
Is there scope to move the BESS's if they are unsafe?	Q+A 1	x				Won't be their decision really, would be at the suggestion of the SoS

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
The safety of the installation should be the first point to consider not the last.	Q+A 1				x	Luke agrees but cannot state any of the safety measures yet
What testing and maintenance standards will you be upholding for panels? (Arcing and Fire)	Q+A 1				x	it is rare
Will you be using infrared cameras to check?	Q+A 1				x	Explains how they work
Do you have a contingency plan for the BESS locations?	Q+A 1	x				Don't expect safety concerns due to mitigation
What will be done to ensure locals are hired to work on the scheme?	Q+A 1				x	Looking at this but no commitment at the moment
How many residents live within the villages around Sunnica?	Q+A 1				x	Sent 10,500 booklets out but don't know how many people live in the area that they will be affecting
If the owners can change, who will be responsible for ongoing safety and who is liable for a major incident?	Q+A 1	x				The applicant and the company directors
How many people will be hired from local area?	Q+A 1	x				Couldn't remember the exact figure for the jobs created, but in the PEIR, but not necessarily local
The Rochdale Envelope makes Sunnica come across as not transparent.	Q+A 1	x				This is just the rules, and they think it is an intelligent way of managing change.
Is there any way you can bury the batteries?		x				We have decided not to do this.
IS there a way you could bury the batteries?	Q+A 2	x				You can but not feasible

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
Why are you not admitting that the batteries are unsafe and unstable?	Q+A 2			x		Widely deployed across the world safety will be paramount in FSBMP
The ten point plan does not contain solar	Q+A 2	x				More recent document does include wind and solar
How can you explain all the fires and explosions in batteries?	Q+A 2				x	Learning curve at Grid level - will be learning from it
Have you ever considered a wildflower meadow in set aside?	Q+A 2		x			Yes, they will
How have you scoped the long-term development of the scheme, as it isn't part of the ten point plan?	Q+A 2	x				Will be part of the mix, don't think it will be obsolete, but others will be more effective potentially
I cannot believe you would have this on your doorstep and wind power exceeds solar	Q+A 2				x	No comment
We don't like Matt's save the world spiel, why don't you stop using him?	Q+A 2	x				It is the environment and everyone's spiel - a lot of people have the same opinion
It all comes down to a NSIP which will damage the land around here forever, how can you live with yourself?	Q+A 2	x				Sunnica are aiming to give a net benefit in terms of biodiversity, local socio-economics and the environment
Luke you know better than me that the scheme changed as a land owner pulled out, not because of feedback.	Q+A 2				x	One and the same
Do you feel uncomfortable with so many people opposed to this because you think you have NSIP backing?	Q+A 2	x				No- the level of engagement is a success of the consultation

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
You seem to not be able to avoid child labour?	Q+A 2				x	To avoid 'where-possible' child labour, can't guarantee that
Matt what is the largest project you have managed to date?	Q+A 2	x				In US have 500MW projects but Sunnica is the largest
This answer on child labour is not good enough.	Q+A 2				x	Sunnica aren't part of the procurement project
How could this project be reduced in size as this is the big issue of this project?	Q+A 2	x				It won't be reduced
If the development of solar is ever improving will the tech not go out of date very quickly?	Q+A 2	x				Yes. but it won't be obsolete
I have emailed in to Sunnica multiple times and only some have been replied to, are you just answering easier questions?	Q+A 2	x				Takes a while to fact-check more technical questions, so can take a while
What role does Newgate Consultation have in the consultation? Why are our responses being sent to them?	Q+A 2	x				Experience in this field in tracking responses and DCO's, Sunnica doesn't have the capacity for it
How will you be outlining the responses to the consultation do you have to consider every point?	Q+A 2	x				All comments have to show due regard from the applicant
How can the statutory consultation continue without knowing alternatives (and other info), it is not effective	Q+A 2			x		Will be in the DCO
Sunnica claimed that they didn't know the answer to specific questions, yet having fully assessed the whole site they should know the	Q+A 2		x			Don't have the final design, have an indicative design (PEIR)

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
answers, and therefore it seems they just don't what to tell us.						
If no batteries at Burwell, does that mean imported energy is sent all the way back to BESS's on sites? Is that not inefficient?	Q+A 2	x				Yes, but losses are marginal
What is the capacity of the BESS in MWh and what is area of battery storage?	Q+A 2			x		Info will be in DCO to a certain extent
Please advise on digging the trenches along the Fordham house court estate will impact businesses in Fordham? Concerned about Pollution, Noise and accessibility?	Q+A 2			x		Temporary disruption, but in the construction plan
I would like to know the impact of the scheme will have on local villages?	Q+A 2		x			Very general
How long will building take?	Q+A 2	x				About 2 years
Where will the workers live?	Q+A 2				x	Off-site but located within a certain area (Not sure what that is)- B and Bs and hotels
Where will the workers and lorries park?	Q+A 2	x				2 proposed car parks
Claim 994 jobs will be created in deconstruction but how can you assume this so far in advance and this seems an over assumption?	Q+A 2				x	Will go away and check
Have you included cost of decommissioning in your plans?	Q+A 2			x		Will be in decommissioning document and responsibility of the funder

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
What will happen to the batteries requiring recycling before decommissioning statement is produced?	Q+A 2				x	Batteries can be up-cycled and repurposed etc, but most likely a new sector for recycling batteries- no mention of how they will do it
When is the development is complete, it will likely be sold on, what will they legally be bound to do?	Q+A 2	x				Bound to DCO
At the end of the scheme will the land change from green field to brownfield?	Q+A 2	x				No it won't
Have you signed up the landowners?	Q+A 2				x	In the process of completing the property agreement, but no legal obligation to say
Have you signed on the landowners along the cable route?	Q+A 2				x	Negotiating with landowners all the way along
How have you not considered whether the area is of high or low value in deciding the appropriate area?	Q+A 2	x				Consider value to society and value for wildlife.
You will be closing the right of way (Ickfield) which is vital to local services and so many people? How is this appropriate?	Q+A 2				x	Safety is important, and not sure if they will, or in time include it
Putting the commitment on the funder for avoiding child labour isn't good enough?	Q+A 2				x	Can't comment
Can you please define how loud construction will be and will there be a background hum through the scheme?	Q+A 2	x				90/110 decibels- similar to roadworks for construction. Batteries will make a noise.

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
Will construction traffic travel through villages HGV? Will there be a plan in place to repair roads afterwards and will they be going through villages at 6am?	Q+A 2		x			In traffic plan and movements are broken down.
Will HGV's be using the street in Snailwell? And in what numbers?	Q+A 2	x				Yes, and one HGV a day most likely
You have split the sites up, have you considered other parts of the UK for this site?	Q+A 2				x	Scale of the need is dramatic
How big is the next biggest solar farm in the UK?	Q+A 2	x				Cleve Hill
Where has there been a scheme on this scale carried out before to determine long term health risks?	Q+A 2	x				Spain and China, but none on the scale of this in the UK
You say there will be no significant impact on health and well-being, please can you define significant?	Q+A 2				x	Uses methodology of health department, but considers holistic approach of during construction and operation
I am concerned about my drinking water? Have you consulted with Anglia Water and will there be ongoing assessment?	Q+A 2			x		Will be ongoing assessment, have consulted with Anglia water and will continue to do so. Piling isn't deep enough to contaminate water
How long after the solar panels are removed will it be appropriate for agriculture again?	Q+A 2	x				Almost immediately
What is Matt's role on an Essex solar project, etc?	Q+A 2	x				Matt owns other companies and is director on various schemes

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
Can you commit to never using overhead towers for cabling?	Q+A 2	x				Currently putting all below ground.
How big are the main connection cables (Diameter, material and size)?	Q+A 2			x		Depends on markets and prices and specifications of the scheme
Please can you video the site on drone, both before and after construction?	Q+A 2				x	Good idea but not sure
Are there any plans to upgrade the road infrastructure as will be using small lanes?	Q+A 2			x		Could do, will be approved before construction
Matt please can you tell us about the financial status and experience of PS Renewables?	Q+A 2	x				One of the companies he owns, Padero Solares owns PS renewables, can find finance details on Companies House
Cable jointing chambers will be needed, how large are they? How many? Will they be dug up at the end?	Q+A 2	x				Mentioned in other webinars, will have to get back to you but (20mx5mx2m) and won't be dug up
The change of use from farming to solar will change the microclimate (Wind, temp, humidity etc)	Q+A 2	x				Not such a big problem in the UK - in Dubai, minimal change but not considered an issue
It is encroaching far too much on villages?	Q+A 2	x				Feedback taken onboard from previous consultations
Is your contribution to the national grid coming from Solar only?	Q+A 2	x				Generating electricity from the solar, but importing from the national grid
What additional economic advantages does Solar have over wind in the cold and windy UK?	Q+A 2				x	UK is good for solar

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
Over 40 years as technology improves, is there a break clause that allows you to decommission before the 40 years?	Q+A 2	x				Yes, there is
Why aren't you buying these from the UK?	Q+A 2	x				Not made in the UK at a low cost
How many times will the batteries and panels need replacing in the scheme?	Q+A 2				x	Unsure, depends on the technology
There is a difference between renewable and sustainable energy, solar farms are being installed with no knowledge on how to recycle panels and batteries, creating a problem for the future.	Q+A 2				x	
China are using huge amounts of coal electricity to create solar panels.	Q+A 2					Feeds into the carbon calculations
Matt how many projects have you managed that have been completed?	Q+A 2	x				Over 30, look after over 300 projects
Seems to be growing opposition to this scheme and you seem unwilling to withdraw, can you at least apologise for the horrors you are imposing on the area?	Q+A 2					There is a need for these schemes
Can Matt and Luke answer if they have any connection to Paderos?	Q+A 2	x				Matt is co-owner
Can we see your safety plan for review? If not how is this an effective consultation? Very few people can be interested parties if they don't have this sooner?	Q+A 2			x		BFSMP is still in draft form

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
Who are the big 6 (energy producers - Investors)	Q+A 2				x	Didn't say
Your proposal uses good farmland, north of Brandon is heath land which would be more appropriate?	Q+A 2			x		Methodology of alternatives in PEIR and more in DCO
Why is your project so big?	Q+A 2	x				Big need
Is this project only viable at this size due to the huge amount of cabling?	Q+A 2				x	Lots of factors
Would you buy houses in this area if it were so close to a scheme like this?	Q+A 2				x	Our aim to mitigate the visual impact
I have spoken to the older population of the village, who don't do webinars, why don't you wait and do it properly when we all meet?	Q+A 2	x				Don't know when Covid will end and this is deemed appropriate
All tech becomes obsolete.	Q+A 2	x				Yes it does, it will be the same here, it will serve out its purpose
This is the biggest project in Europe, either all the others lose money or this one could be smaller?	Q+A 2	x				There is a need
Why was the BESS relocated closest to Red Lodge?	Q+A 2	x				Deemed to be a good location- close to transport links, don't think it is very close to schools and residents.
If this scheme is deemed to be financially viable, what compensation can home owners receive due to property devaluation, not to mention not being able to sell them?	Q+A 2	x				Don't think it will impact the housing prices

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
How would you all feel people were killed from a battery fire, or is this not your problem?	Q+A 2			x		It is the responsibility of the project, but it is very unlikely and BFSMP will be thorough.
Do Newgate Comms have a comprehensive media monitoring system in place?	Q+A 2	x				Yes
If we need batteries put them well away from people if they aren't safe.	Q+A 2				x	
Isn't this just a tick box exercise for you and just talking and not listening?	Q+A 2	x				Untrue- we will be responding to feedback
How can you say the PEIR is comprehensive if you haven't provided information?	Q+A 2			x		The PEIR isn't meant to be final, more in DCO
If the farm is built, would Sunnica like to buy my house off me at the market rate and send their children to the school 1km away from the BESS.	Q+A 2	x				Won't buy people's houses but yes Matt would live near the BESS
Your idea that we will all be using electric cars is wrong- get real, we will be long beyond this tech by the time this scheme is completed.	Q+A 2					Electric car revolution is coming.
Can you please ask Luke to stop talking about alternatives methodology, show us the list.	Q+A 2			x		Will be in the DCO
Roughly how many panels can go on one acre of land?	Q+A 2				x	Changes, but will come back to that.
What is the highest structure on the sites?	Q+A 3	x				Burwell substation - could be up to 12m in height

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
If you can serve section 172's and get DCO to grant CPO does that mean the scheme can go ahead with no landowners permission?	Q+A 3				x	Talked about section 172's for access but did not say whether the scheme could go ahead without permission but get CPO if strong case so - YES
Does Sunnica expect to be granted gov subsidies?	Q+A 3	x				Funded privately
Why have you not included the inevitable fall in housing prices in the socio-economic impacts report?	Q+A 3	x				No evidence to say housing prices fall
What are the socio-economic benefits for locals?	Q+A 3		x			Construction jobs, however, this is at the discretion of the construction contractor
Construction jobs will only be temporary what benefits are there?	Q+A 3		x			Full- time jobs (4) and access to the scheme, internships, apprenticeships and business rates
So will the people currently employed on the farmland will be offered jobs on Sunnica?	Q+A 3	x				No, spoke with farmers and their operations are flexible so little impact
Is it true La Hogue have pulled out?	Q+A 3	x				Confidential
What are the safety records in terms of expected accidents, injuries and death? What do you predict for this including panels, cabling, batteries and road accidents?	Q+A 3				x	Haven't got a health and safety plan
Are you going to answer the left-over questions from last week?	Q+A 3	x				They are going to be answered on our website - we don't have time

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
This scheme will not be decommissioned, it will merely be updated, will the jointing cables be in concrete?	Q+A 3	x				Don't know about concrete, but don't think the scheme will go beyond 40 years
What are the benefits for the local communities?	Q+A 3		x			Access, supply chain, skills, business rates
Already a small solar farm in Burwell, why can't you put the solar farm there where there is no residential property?	Q+A 3	x				Methodology for site selection
Why is it this big?	Q+A 3	x				Need it for the environment
Employment- so you will just employ people for 2 years and then lose jobs for local farmers?	Q+A 3	x				Farming system is flexible, and hiring 900 people during construction
Will permissive paths replace footpaths, how will you ensure access for people?	Q+A 3	x				Will be secured under property agreements
Matt how big are the solar projects you run? Are they also ruining countryside?	Q+A 3	x				50 kw to 50 MW SF's and they are next to people's houses
Have you spoken to the people injured in the Arizona battery fire?	Q+A 3			x		Creating outline BSFMP
Why have you not postponed the consultation till we can meet face to face?	Q+A 3	x				Guidance saying keep going as we will need these projects to help the economy and didn't know about the vaccine
There have been several fires from BESS's, it is misleading to say these schemes are safe.	Q+A 3			x		Creating a fire risk safety plan for the DCO

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
I have solar panels on my roof and given their size can I deduce there will be 1.6 million solar panels?	Q+A 3	x				Panels have increased in capacity, Matt estimate 1.1 million
Have you considered the loss of biodiversity on the site? What do you have to show for biodiversity for the DCO?	Q+A 3		x			Have done extensive testing and in the PIER
What material will the underground cables be made of?	Q+A 3	x				A metal, wrapped in protective materials
After decommissioning of the panels, will they be updated with new panels?	Q+A 3	x				No, panels degrade 0.5% a year but can't see them replacing them
Under the compulsory purchase issue, you are acting as other infrastructure providers, I am aware in other large schemes funding has been made available for communities to access to improve local facilities, has this been considered and rejected?	Q+A 3	x				Considering how the scheme can provide benefits other than money-emphasis on skills and legacy benefits, don't know about that yet though
Also why is Sunnica relying on landowners to provide the benefits of paths?	Q+A 3				x	
This is a farce - avoiding us and stifling our voices and blaming it on Covid	Q+A 3	x				Put it in your consultation feedback.
Which species will lose the most through this scheme?	Q+A 3	x				Created specific mitigation sites and where there are impacts they will try to mitigate adverse impact and enhance biodiversity

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
The largest landowner in the scheme is also in the industry of solar, is this why you sited Sunnica here?	Q+A 3			x		Alternatives methodology for assessment in DCO
Do you think the UK's solar need could be met by using rooftops and not green land?	Q+A 3	x				No, we need lots more
If this goes ahead, will Matt and Luke be willing to put their money into charities to help the community they are damaging?	Q+A 3				x	No they won't but community benefits strategy may be considered
You will be releasing Carbon in construction. Seems like a waste of good farmland as we need to farm for food.	Q+A 3	x				Net emission reduction gain, need to find other land to farm, also providing food (through sheep)
Is it not true that the larger the scheme, the more money you will make? It isn't green after all	Q+A 3	x				We live in a capitalist society - so yes
What proportion of the jobs you create will be fulfilled by people from the villages your scheme most effects?	Q+A 3				x	3/4 jobs based on the 'travel to work' area assumption but just an estimate and will be decided by the contractor so no commitment
PIER states all traffic accessing East Site A through Worlington- already very busy, small junctions etc?	Q+A 3			x		Specialists will look at this at the next stage but so far it is assumed
You are saying the outputs of the farms you have but you aren't saying the areas covered?	Q+A 3				x	Doesn't know
Are you able to say how many people have attended the webinars throughout?	Q+A 3			x		Will be in consultation report

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
The electricity from the panels will go from the panels to the national grid or BESS's, will it flow back?	Q+A 3	x				Yes can export and import electricity
When the panels are delivered to site, how many panels can come in a single lorry?	Q+A 3	x				Come double stacked - four quads double stacked - 60 in a crate
Panel technology is advancing, therefore will you shrink this site and move it back from villages?	Q+A 3	x				No- in some cases they have set back panels 100's of meters from villages but are going to maximise grid connection
Before you decided to carry out the virtual consultation, how did you assess what proportion of the population would be able to access the online information?	Q+A 3	x				Had meetings with officers from local authorities, set up a working group, not just virtual, went out 10,500 copies of consultation and phone calls
Will the cable be cooper or aluminium, what will the wrapping be and how long will it take to decompose?	Q+A 3	x			x	Not sure if copper or aluminium, depends on pricing, wrapping will be protective sheath but depends on material
When you count your webinar - not all these webinar people are unique, every week, this will not be the total number of people engaged.	Q+A 3	x				Taken onboard and webinars are just one part of it.
Matts comment on inefficiency is misleading - they are not 50% efficient.	Q+A 3	x				This is talking about aging of the panels
What will happen to the substation extension at the end of the project? Will you sell it?	Q+A 3	x				Will be decommissioned, but if still working National grid might seek to maintain it if it is still operational

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
Skilled electricians have done 4-year apprenticeships and higher training, apprenticeships for the scheme would take 3-5 years and therefore very difficult, meaning low levels of training and low skill impact.	Q+A 3	x				Strongly push back on this- exciting feedback from West Suffolk college etc
Would you be considering building local recreational building such as gyms etc and run them from the power of your plant?	Q+A 3	x				No - they wouldn't be providing power to locals
Can you work with local owners to build a temporary access road from East Site A to B? So high traffic doesn't have to go through Worlington?	Q+A 3			x		Are still evaluating
How can you say legacy when the scheme will be decommissioned in 40 years/ will they then have to retrain?	Q+A 3	x				No can take skills elsewhere
This is not rewilding- that is resulting in bushes and trees, not mown grass.	Q+A 3				x	
I thought sustainability meant eating locally sourced food and not livestock?	Q+A 3	x				Some of the land already being used for livestock
There is already harm to Community - money and time spent and local anxiety and upset in the community- I don't see any local benefit.	Q+A 3				x	
Matt Hazel- which environmentalists encouraged you to build massive solar farms on agricultural land?	Q+A 3	x				David Attenborough, the news, etc

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
If you don't answer the Tilbrook Question about La Hogue then you are actively encouraging a boycott of them?	Q+A 3	x				Doesn't change anything
Do you have any interests in other solar farms of this scale in the UK?	Q+A 3	x				Luke - not that I want to discuss, Matt - yes
How can you live with yourselves, ruining the safe, beautiful environment we chose to live in to raise our children.	Q+A 3	x				Proud of what they do
We know the Walnut Tree junction is very narrow and Mildenhall to Burwell is already failing. Please can you make sure you don't bring gridlock to our streets?	Q+A 3			x		Will look into at the next stage
What is the lifetime of solar panels? And batteries?	Q+A 3	x				Over 40 years for panels, batteries will be 4/5 years
Matt who will be making these panels for you?	Q+A 3	x				Depends on technology provider
They are less than 150 yards from my house, the panels.	Q+A 3	x				That is a long way away
Would it be possible to import electricity when it is cheap and then sell it back when it is more expensive?	Q+A 3	x				Yes
You must admit that the substation might not be decommissioned if the grid wish to keep it?	Q+A 3	x				Yes, but the national grid would have to put in an application - Sunnica don't own the land.

Question	Session	Question Answered	Referred to PEIR	Question will be answered later in DCO	Question not answered or deflected	Outline of Answer Given
We have increasing numbers of home workers, how will Sunnica ensure they will not disrupt internet and connectivity?	Q+A 3			x		These cables will be identified
The very obvious community benefit would be to keep the land as agriculture	Q+A 3				x	
Are you saying the pigs on the land at present will be allowed through the panels?	Q+A 3	x				Not pigs, too good at digging.
The community has not said it is against solar panels in the field, it is too big, too much guess work, it is like a big jigsaw puzzle.	Q+A 3				x	