

### **Q1.1.2 – Community Liaison Group**

**Respondent: Morningthorpe and Fritton Parish Council: Interested Party no:** [REDACTED]

Morningthorpe and Fritton Parish Council (“MFPC”) supports the establishment of a Community Liaison Group (“CLG”), provided that it is established as a genuine two-way engagement and problem-solving forum, with clear responsibilities, accountability and escalation arrangements.

MFPC considers that the following principles should be incorporated into the CLG terms of reference.

#### **Membership and representation**

All Parish Councils materially affected by the Scheme should be entitled to nominate a representative and substitute.

Membership should also include appropriately senior representatives of the Applicant, its principal construction contractor(s), the Community Liaison Manager, South Norfolk District Council and Norfolk County Council, with other relevant statutory bodies attending where necessary.

Residents must also have a meaningful route into the CLG. This should include the ability for residents and local community organisations to submit matters for consideration and, where appropriate, provision for resident or community representation and public sessions.

Parish Councils should not become the Applicant’s sole means of communicating with residents or receiving their concerns.

The structure should also recognise that impacts will not be evenly distributed between parishes. Communities accommodating or experiencing greater levels of infrastructure and construction activity should be capable of receiving a correspondingly greater level of engagement.

This is particularly relevant to MFPC. The Parish Council has a full membership of only five councillors, while the parish is proposed to host a significant proportion of the major infrastructure and associated construction activity required for the Scheme. The resulting engagement burden is therefore likely to be disproportionately significant for a very small Parish Council.

The separate ExA question concerning the purpose and operation of the construction compound at Site 5, which arose from a matter raised by MFPC, illustrates the type of detailed local issue with which the Council is likely to have to engage during construction. EN0110014-000639-Examining Auth...

#### **Chairing and administration**

MFPC considers that there would be merit in appointing an independent chair, agreed with the participating Parish Councils and relevant local authorities and funded by the Applicant.

The Applicant should provide and fund appropriate secretarial and administrative support, but should not have sole control over the agenda, minutes or recording of actions and conclusions.

Participating Parish Councils and community representatives should be entitled to place matters on the agenda.

### **Remit of the CLG**

The CLG should be able to consider any construction-related matter materially affecting local communities, including:

- construction traffic, HGV movements and abnormal loads;
- road closures, temporary traffic management and highway condition;
- construction compounds and working areas;
- working hours, noise, vibration, dust and lighting;
- drainage, flooding, mud and debris on highways;
- public rights of way and local access;
- landscape, ecology and mitigation works;
- construction incidents and emergency arrangements;
- compliance with approved management plans and commitments;
- changes to the construction programme affecting local communities; and
- cumulative impacts where several parts of the Scheme are being constructed at the same time.

The CLG should be able to make recommendations and request appropriate remedial action. Where the Applicant does not accept a recommendation, the reasons should be recorded.

### **Advance information and forward planning**

A key purpose of the CLG should be to prevent problems rather than simply discuss them after they have occurred.

The Applicant should provide a regularly updated forward programme showing significant activities anticipated in each area, including intensive construction periods, significant HGV movements, abnormal loads, traffic restrictions, public-right-of-way changes and other activities likely to cause local disruption.

Information should be supplied sufficiently in advance to enable Parish Councils and residents to understand it and respond meaningfully. Lengthy or technical documents supplied shortly before a meeting should not constitute effective engagement.

## **Communication with residents and accessibility**

MFPC considers it essential that communication is **not digital by default**.

Throughout this process there has been significant reliance upon websites, electronic documents and online information. This risks excluding residents who do not have internet access, have limited digital skills or find large and complex electronic documents difficult to navigate. This is particularly relevant to some older residents.

The need to make Scheme information accessible to people with limited internet speeds or information-technology capability has already arisen elsewhere in the Examination. EN0110014-000639-Examining Auth...

Important information should therefore be communicated through both digital and non-digital means. Depending upon the circumstances, this should include direct letters or leaflets, Parish Council and community noticeboards, printed material available at accessible local venues, telephone contact and other appropriate local communication methods.

Information intended for residents should be written in **clear, concise and readily understandable language**, with technical terms explained where necessary.

Residents must also be able to raise complaints and concerns by telephone, post or other non-digital means. No resident should be disadvantaged because they cannot complete an online form or access a project website.

Where particular works will directly affect a defined group of residents, businesses or road users, the Applicant should communicate directly with those affected rather than relying upon the Parish Council or CLG to pass information on.

## **Meetings**

Meeting frequency should reflect the level of construction activity. Quarterly meetings may be appropriate during quieter periods, but the CLG should be able to meet more frequently when substantial works are taking place.

There should also be provision for extraordinary meetings following a significant incident or where an urgent unresolved issue arises.

Area-specific meetings should be possible where an issue principally affects one part of the Scheme.

Meetings should be held at reasonable times and accessible locations, with remote participation available where appropriate.

## **Complaints, actions and escalation**

The terms of reference should contain a clear complaints and escalation procedure.

Issues raised through the CLG should be entered onto an action log recording:

- the issue raised;
- the date raised;
- the person or organisation responsible for dealing with it;
- the proposed action;
- the target date for completion; and
- the eventual outcome.

Actions should remain open until the matter has been substantively addressed rather than merely until a response has been issued.

Urgent matters should have a rapid-response mechanism. Other complaints should have defined acknowledgement and response timescales.

Where an issue cannot be resolved by the Community Liaison Manager, there should be a clear route for escalation to a named senior representative of the Applicant or principal contractor.

Repeated occurrence of the same problem should trigger investigation of the underlying cause and, where appropriate, a corrective action plan rather than being treated as a series of unrelated complaints.

Residents should also have the ability to escalate matters themselves without having to do so through a Parish Council.

### **Enforcement and non-compliance**

The CLG must not become a substitute for statutory enforcement.

Where concerns indicate a possible breach of a DCO Requirement, approved management plan, highway control, environmental requirement or other enforceable obligation, there should be a clear route for referral to the relevant planning, highway, environmental or other regulatory authority.

The terms of reference should make clear:

- who is responsible for dealing with an issue initially;
- when it is escalated within the Applicant's organisation;
- when the appropriate statutory authority should be notified;
- who is responsible for investigating potential non-compliance; and
- how the complainant and CLG will be informed of the outcome.

The action log should record where a matter has been referred for regulatory or enforcement consideration.

Participation in the CLG must not restrict or delay the ability of MFPC, residents or any other person to approach a relevant statutory authority directly.

### **Transparency and accountability**

Agendas and supporting papers should be circulated sufficiently in advance.

Draft minutes should be produced promptly and members should have an opportunity to correct them before approval. Approved minutes and the current action log should be publicly available, both electronically and in an accessible non-digital form on reasonable request.

Minutes should clearly distinguish between information supplied by the Applicant, concerns raised, actions agreed, recommendations made and matters that remain disputed.

Attendance or participation by MFPC or another Parish Council must not subsequently be represented as agreement with or support for a proposal unless that Council has expressly agreed it.

### **Parish Council capacity and reasonable costs**

MFPC has a full membership of only five councillors. Attendance by one councillor therefore represents one fifth of the Council's entire elected membership.

Effective participation will involve substantially more than attending CLG meetings. Councillors may need to review technical papers, consult residents, prepare questions, attend meetings, report back formally to the Parish Council and pursue outstanding actions.

This burden is particularly significant for MFPC given the scale and nature of the infrastructure and construction activity proposed within and affecting the parish.

MFPC councillors undertake their public duties principally on a voluntary basis. The Council accepts that elected office necessarily involves giving time to parish business. However, it would not be reasonable for a liaison mechanism arising specifically from a major commercial infrastructure project to depend upon an assumption of unlimited additional unpaid capacity from a five-member Parish Council.

The Applicant should therefore make provision for the **reasonable additional costs incurred by affected Parish Councils in participating effectively in the CLG**. This may include additional clerking and administrative work, reasonable preparation and attendance costs, travel or other expenses, communications and, where justified, proportionate technical or professional advice on matters materially affecting the parish.

Any funding should be provided to the Parish Council, or through an agreed local-authority mechanism, rather than through direct payments from the Applicant to individual councillors. Any allowances or expenses payable to individual councillors should remain a matter for the Parish Council and be dealt with in accordance with the applicable statutory arrangements.

MFPC notes the relevant precedent at Mallard Pass Solar Farm, where arrangements were made for Parish Councils to recover reasonably incurred costs associated with preparing for and attending Community Liaison Group and Traffic Management Working Group meetings. MFPC does not suggest that the same rate or precise mechanism must be adopted here, but considers that the principle of recognising and resourcing the additional burden placed upon small Parish Councils is directly relevant.

### **Review and duration**

The effectiveness of the CLG should be reviewed during the early stages of construction and periodically thereafter.

Participating Parish Councils and community representatives should be able to propose amendments where experience demonstrates that membership, meeting arrangements, communications, complaints procedures, escalation routes or other aspects are not working effectively.

The CLG should remain in place throughout construction and until relevant construction-related reinstatement and outstanding community issues have been satisfactorily concluded.

### **Securing the arrangements**

MFPC considers that the principal arrangements should be clearly incorporated into the approved terms of reference and, where appropriate, secured through Requirement 4 or another enforceable mechanism within the DCO.

The minimum arrangements should cover:

- Parish Council and resident representation;
- chairing and administration;
- meeting frequency and accessibility;
- advance information and accessible communications;
- complaints, action tracking and escalation;
- statutory enforcement routes;
- transparency and publication of information;
- Parish Council resourcing; and
- periodic review.

This would provide clarity for the Applicant, statutory authorities, Parish Councils and residents and would enable the effectiveness of the CLG to be assessed against clearly defined commitments.

## Conclusion

MFPC supports the establishment of a CLG, but considers that it must provide **genuine community engagement rather than simply project communication**.

Residents and Parish Councils must receive timely, clear and accessible information; have practical means of raising concerns; know who is responsible for resolving them; and have a defined route for escalation where matters are not resolved.

Meaningful engagement must not depend upon residents having internet access or the ability to navigate complex electronic documentation.

The arrangements must also recognise that MFPC consists of only five councillors while representing a parish which is proposed to accommodate substantial elements of the Scheme. The resulting project-related workload should not simply be transferred to a small number of volunteer councillors without appropriate support.

MFPC therefore considers that an effective CLG requires **meaningful resident participation, accessible communication, appropriate Parish Council representation and resourcing, transparency, clear accountability and a robust escalation and enforcement route where things go wrong**.

**AI use declaration:** ChatGPT (OpenAI) was used to assist with drafting and editing this response, using ExQ1, published East Pye Solar documents, relevant legislation and guidance, other published NSIP examination material, and information provided by MFPC. MFPC has checked the final response and accepts responsibility for its accuracy and content