

FRECKENHAM PARISH COUNCIL

Jadi Coe
Clerk to the Council

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

23rd March 2021

Dear Council

Sunnica Statutory Consultation

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

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

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

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

Yours faithfully



Jadi Coe
Clerk to the Parish Council

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

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

9th October 2020

Dear Mr Murray,

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

Physical consultation events

- The lack of physical consultation events is excluding many villagers who would otherwise engage with the consultation. Freckenham and surrounding villages are able to hold community events such as monthly outdoor Farmers Markets and the recent Freckenham Neighbourhood Plan consultation event (26th September) while complying with Government COVID-19 safety guidelines. It should be possible for Sunnica to design a safe event for each village.
- Freckenham has a high proportion of villagers who are not confident in accessing online materials or webinars, who are hence excluded from the opportunity to ask questions or view the scheme in sufficient detail. Villagers are also reporting difficulties with the consultation booklet (see below) and would much prefer to see maps at large scale. The population profile of Freckenham shows that 25.4% of villagers are over 65, a higher proportion than the national average of 18.4% (ONS 2019, see <https://www.suffolkobservatory.info/population/report/view/62646f73d23e489098a5cdad7a116eed/E04009146/>)
- The Statement of Community Consultation page 16 details the process for beginning consultation events, but the decision point at the 27th October 2020 and the two-week notice period mean any events would not start until mid-November. With only two weeks until the consultation closes on 2nd December 2020, Freckenham Parish Council believes the consultation closing date should be significantly extended. This would allow more time for villagers to visit an event, consider the scheme and how it affects them, and make a meaningful consultation response.
<https://sunnica.co.uk/wp-content/uploads/2020/09/Sunnica-Statement-of-Community-Consultation-16Sep20.pdf>

The Consultation Booklet

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

Advertising the consultation

- The Statement of Community Consultation Table 3 states that the consultation will be publicised in local newspapers including the Newmarket Journal and the Bury Free Press. There are no advertisements of the type used during the non-statutory consultation in the paper editions of the Newmarket Journal dated 10th, 17th, 24th September and 1st October, nor in the Bury Free Press dated 2nd October.
- Freckenham Parish Council submitted a written question to the 21st September briefing requesting a single large banner advertising the consultation for display in a prominent position in villages directly affected by the scheme. The question was mentioned during the briefing, but no response has been made. The use of banners agrees with the adopted West Suffolk Council Statement of Community Involvement on “Line of sight publicity” (Table 1) as recommended by Advice Note 2 from the Planning Inspectorate, Section 5.3 “A local authority’s adopted Statement of Community Involvement (or Community Involvement Scheme in Wales) is likely to have a bearing on its response to the developer’s SoCC Consultation.”
 - https://www.westsuffolk.gov.uk/planning/Planning_Policies/upload/18-12-20-SCI-adopted-version.pdf
 - https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2015/03/Advice_note_2.pdf
- The lack of effective advertising has limited awareness of the consultation in progress, and this is shown in the lack of engagement in online activities such as the webinars, where fewer than 20 connections were made for webinars on the 1st and 3rd October 2020. Freckenham Parish Council believes the consultation end date should be significantly extended while proper advertising in the press is carried out as detailed in the Statement of Community Consultation, allowing villagers time to engage properly with the consultation.

Webinar format

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

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

Yours sincerely



Jadi Coe
Clerk to the Parish Council



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

15 October 2020

Dear Jadi,

Sunnica Energy Farm

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

Approach to consultation

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

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

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

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



Physical events

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

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

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

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

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

Consultation materials

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

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

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

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

Consultation publicity

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

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

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

Webinars

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

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

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

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

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Conclusion

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

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

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

Yours sincerely,



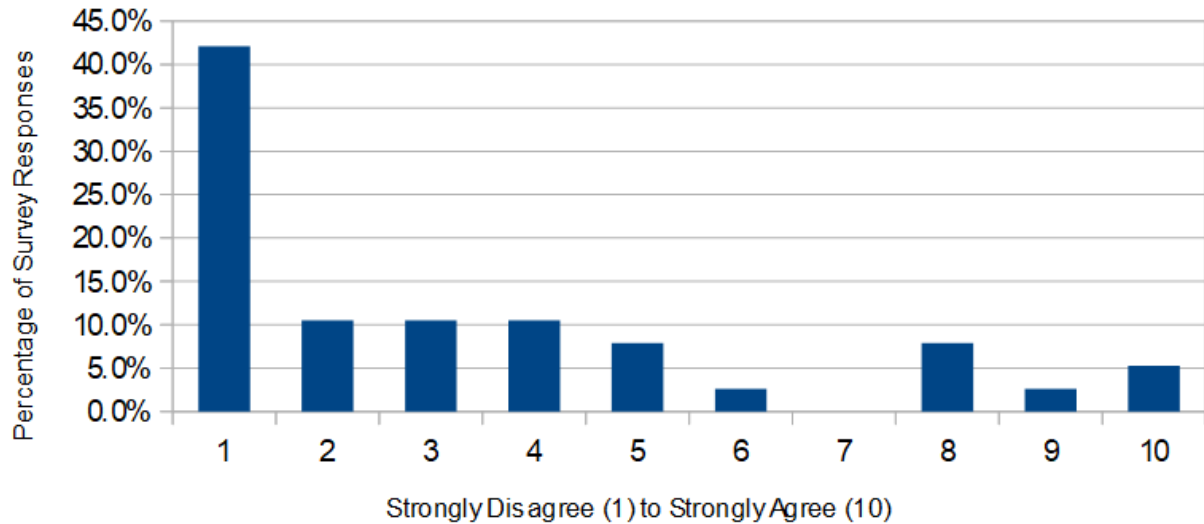
Luke Murray
Sunnica Ltd

Sunnica Statutory Consultation Survey by Freckenham Parish Council.

Graphs of responses to questions

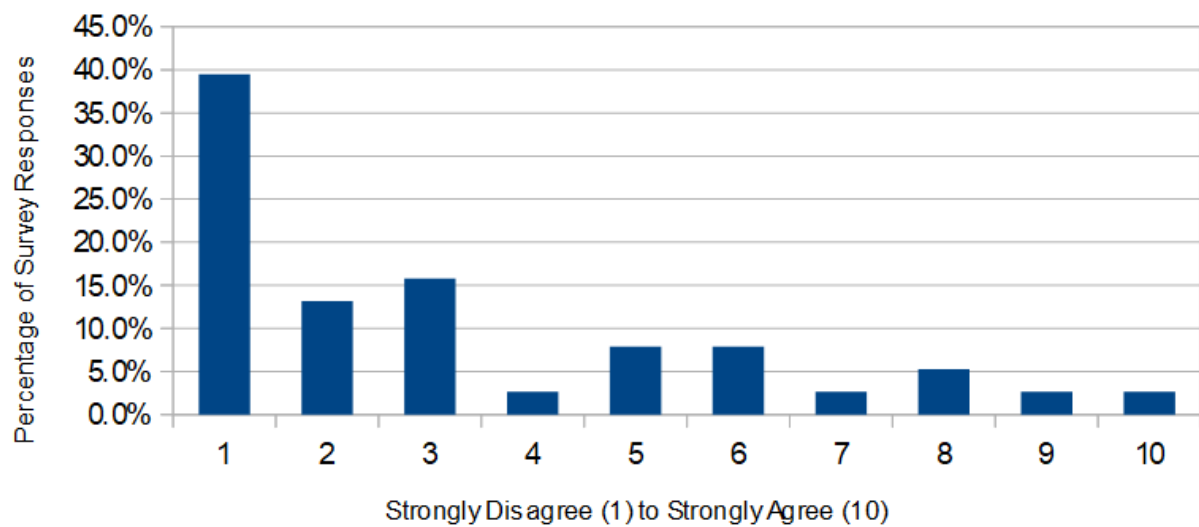
Sunnica Statutory Consultation Survey by Freckenham Parish Council

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



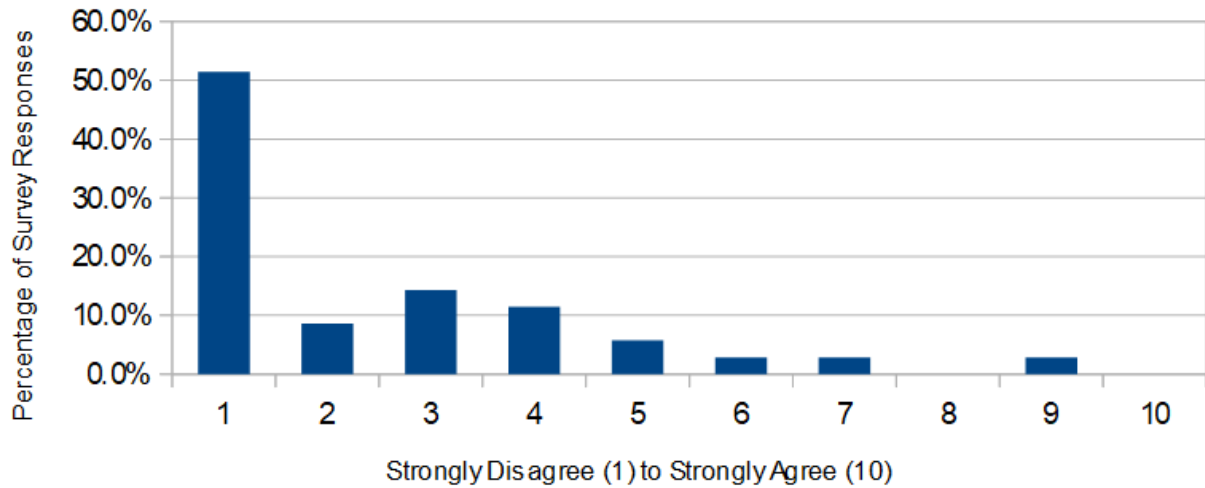
Sunnica Statutory Consultation Survey by Freckenham Parish Council

Q2: The information supplied was easy to understand



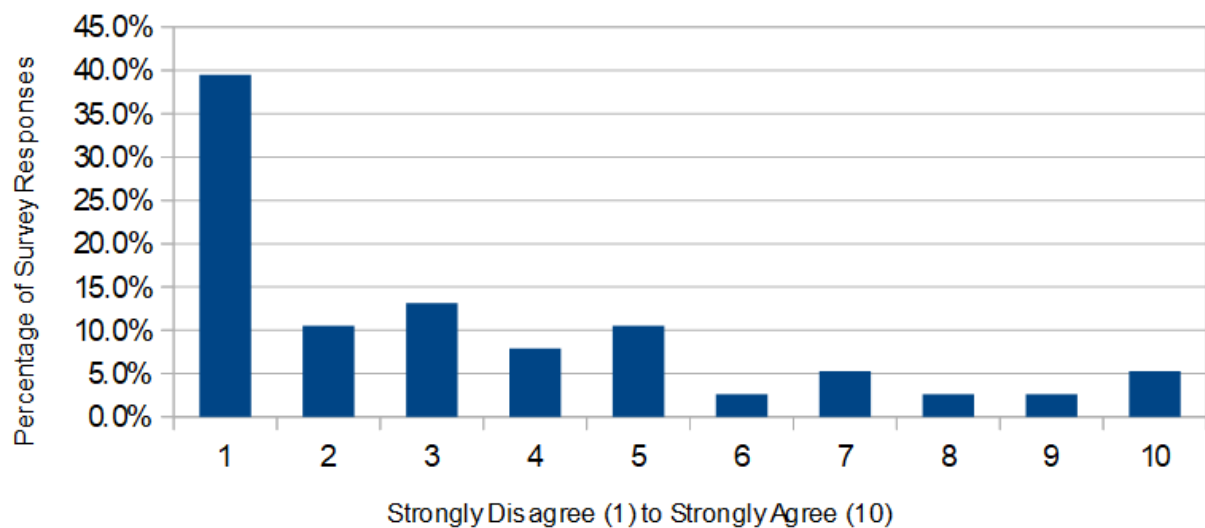
Sunnica Statutory Consultation Survey by Freckenham Parish Council

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



Sunnica Statutory Consultation Survey by Freckenham Parish Council

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



Written comments received, organised by survey question.

Comments to Question 1

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

Some detail ambiguous

Badly presented

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

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

The plans were deliberately difficult to understand

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

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

Montages were no convincing

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

Vague and provided little clear information I required

Maps not clear in booklet

Booklet vague, not aware of the online information available

Unclear, too much irrelevant waffle.

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

The online was better

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

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

All information unclear

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

Comments to Question 2

“The information supplied was easy to understand.”

Technical information needed more clarity

As obscure as possible

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

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

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

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

Vague and provided little clear information I required

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

lacking.

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

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

The drawings could have been larger

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

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

It seemed deliberately unclear

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

Comments to Question 3

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

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

Maps impossible to follow

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

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

There was no ability to raise questions in any satisfactory forum

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

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

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

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

[webinars] At difficult times during the day

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

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

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

Absolutely not

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

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

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

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

Inadequate answers given and unable to challenge answers given

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

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

Comments to Question 4

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

Not this type of consultation

Has added strength to my resolve to continue to protest

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

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

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

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

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

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

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

Several questions remained unanswered

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

Consultation, especially at the start, has been abysmal.

Neither the consultation nor individual communication to Sunnica provides answers

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

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

It allowed me to respond, nothing else.

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

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

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

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

Responded where able to but very unclear information given.

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

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

Inadequacy of Consultation – bullets

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

Lack of Access to Information:

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

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

Webinars

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

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

Inadequate Time to Review Information

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

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

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

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

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

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

Misleading Statements and Claims/ Poor Advertising

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

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

- Consultation notifications in local newspapers were written in the small print at the back of the newspapers – these are not widely read (see photograph example below from the Newmarket Journal). Again, no mention of the scale / location was given in the adverts. Whilst this might meet their 'bare minimum' statutory obligations, Sunnica has an **award winning communications company** working on their scheme, so it is very disappointing that they could not have found a more effective means of advertising the consultation...through local village publications, community Facebook groups etc. These are much more widely read by the local residents, particularly during a pandemic. The village publications (e.g. Informer in Isleham, Turnpike in Red Lodge, etc) are hand delivered to every household in the directly affected villages and would have been a far more effective way of engaging with residents about the consultation.
- Sunnica did run a small number of 'panel adverts' in a few local papers, but these again used very small white text on a dark background, making them difficult to read. And the same description for the scheme was used as discussed earlier in this document (i.e. no mention of the scheme being in Suffolk, no mention of it being a NSIP, no mention of the size, location, etc. etc.). Many residents (especially in Suffolk) would therefore not pay any regard to these. Surely the point of advertising is to draw the attention of *all* affected people to what the proposal actually is and to attract their engagement. Their newspaper adverts did no such thing. Sunnica also claimed during one of their webinars that they ran a paid Facebook campaign resulting in several thousand page impressions – but we are not aware of any of the village FB community pages getting any 'hits,' so it's unclear who the recipients actually were.
- No physical advertising in the form of posters and banners was available in the villages until Freckenham Parish council requested these 5 weeks into the consultation. Even then, only 1 small banner was sent per village. More banners/ posters/ placards etc were needed to draw attention to the consultation – one solitary banner per village has practically no impact. And by the time the banners arrived and were put in place we were in a second national lockdown, meaning that residents were not moving around the villages, so didn't see them. The banners also had incorrect dates on them, which were never changed. The use of banners agrees with the adopted West Suffolk Council Statement of Community Involvement on "Line of sight publicity" as recommended by Advice Note 2 from the Planning Inspectorate, Section 5.3 "A local authority's adopted Statement of Community Involvement (or Community Involvement Scheme in Wales) is likely to have a bearing on its response to the developer's SoCC Consultation."
(https://www.westsuffolk.gov.uk/planning/Planning_Policies/upload/18-12-20-SCI-adoptedversion.pdf)
(https://infrastructure.planninginspectorate.gov.uk/wpcontent/uploads/2015/03/Advice_note_2.pdf).

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

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

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

Statement of Community Consultation (SoCC)

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

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

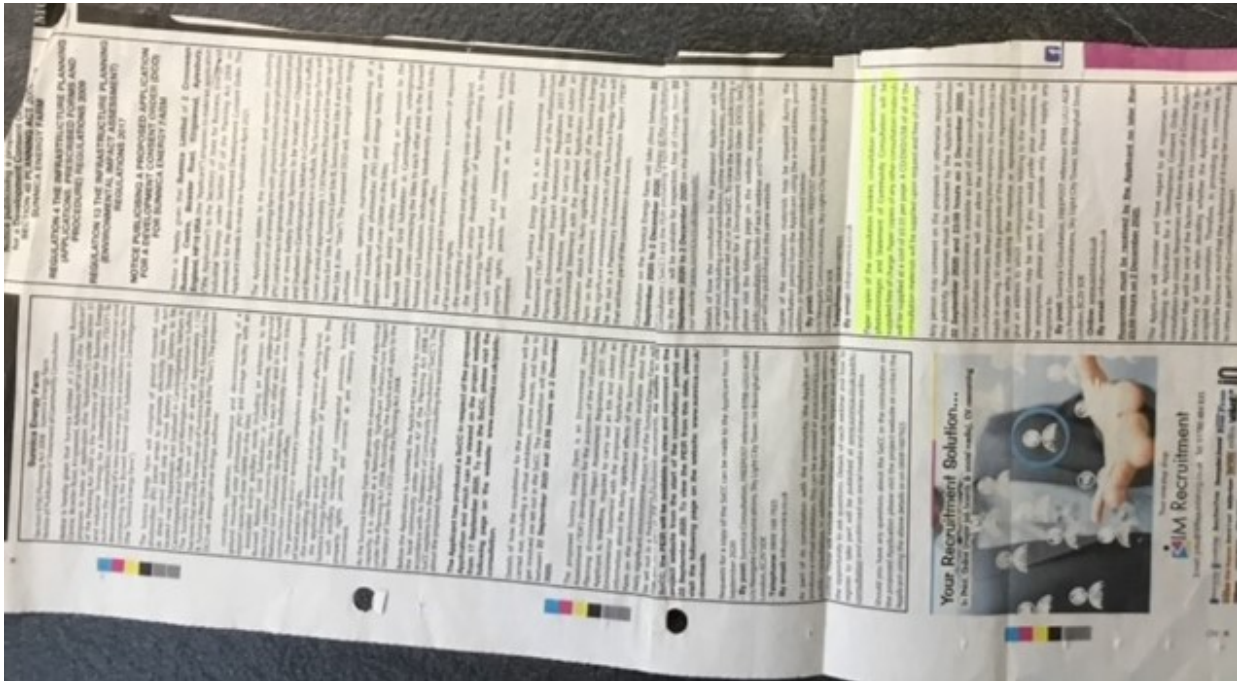
- In the SoCC it also specifically states that the public will be asked for views on the PEIR. As mentioned previously, this was not made available to all residents, so how can they be consulted? Sunnica said the PEIR was too big to put onto DVD, so anyone without a computer/ internet access cannot see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

Complaints

- ECDC councillors have already complained about the "woefully inadequate and laughable" consultation ([East Cambridgeshire District Council - YouTube](#) relevant meeting, Sunnica starts about 2 hours in [East Cambridgeshire District Council, Planning Committee 2nd September 2020 - YouTube](#)
- [Say No To Sunnica - YouTube](#) – WSC Councillor describes the consultation as 'farcical' (listen to 3.01 mins)
- Despite claims in the SoCC, ECDC councillors said that 3 Cambridgeshire Parish Councils that are directly affected by the scheme have had NO direct contact from Sunnica. (Ely Standard Newspaper article Sept 2020: ECDC councillors ['Man up' and start talking energy firm told](#)).
- Suffolk councillors requested further information so that people can make an informed assessment of the scheme. Comments such as, "At this stage of the process we have many questions to which the answers are not entirely clear, so it's appropriate at this stage to take these issues to the developer." And, "The sheer scale of the project means its impact will be significant and very far-reaching (<https://www.eadt.co.uk/news/suffolk-councils-sunnica-solar-farm-response-6547654>
- Freckenham Parish Council – sent letter to Sunnica on 9th Oct outlining many concerns about the inadequacy of the consultation. Sunnica declined to offer additional support for

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

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



Example of 'Panel Ad.' Bury Free Press

Public consultation
22 September 2020 – 2 December 2020

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

Find out more

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

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

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

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



ISLEHAM PARISH COUNCIL

Clerk: Richard Liddington
The Beeches
32 Mill Street
Isleham
CB7 5RY
Tel: [REDACTED]
E mail: islehampc@gmail.com



Ms Julie Barrow

West Suffolk District Council

18th May 2021

Dear Julie

As you are undoubtedly aware, the Parish of Isleham, along with several other East Cambridgeshire and West Suffolk parishes all face the prospect of irreversible damage to our communities as a result of the impending application by Sunnica for permission to build a 2800 acre solar farm within our parish borders.

Although there are many reasons for us wishing to object to this proposal the primary reason for me writing to you at this stage of the application is to place on record the view of councillors and residents of this parish at the distinctly inadequate lack of consultation by Sunnica and to seek your support in fighting this application particularly the inclusion of our concerns when responding to the 'Adequacy of Consultation' made to the Planning Inspectorate.

Our specific, individual Council concerns relate to the fact that East Site A which borders the very edge of our village, was added to the application at the very last minute and despite repeated requests Sunnica completely:

- failed to undertake any direct dialogue with Isleham residents prior to the start of the official consultation period
- refused to share maps and other associated information which:
 - o restricted both the Parish Council and residents informed engagement with the consultation process
 - o resulted in many residents still being unaware of the full implications of their proposal
- treated local residents with complete contempt by refusing
 - o direct dialogue
 - o to address any previously raised concerns in your proposed application
 - o to answer a wide range of questions raised by residents during their Webinars

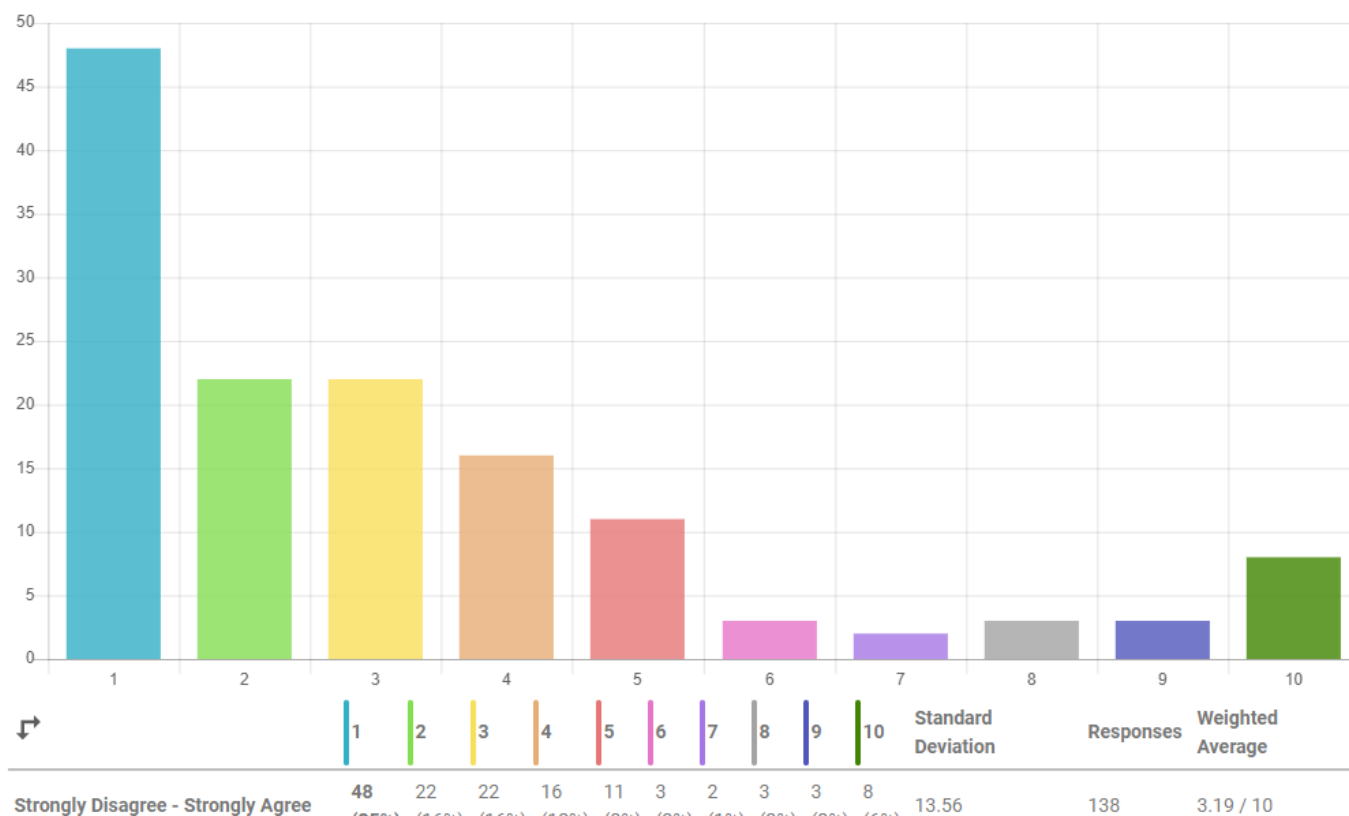
Our more general concerns relate to Sunnica's:

- over reliance on their brochure as their primary means of consulting. This brochure gave only a brief overview of certain aspects of the proposal. The brochure was also meant to be read in conjunction with the Environmental Information Report (PEIR) but this was not made accessible to residents
- assumption that residents could access the online information

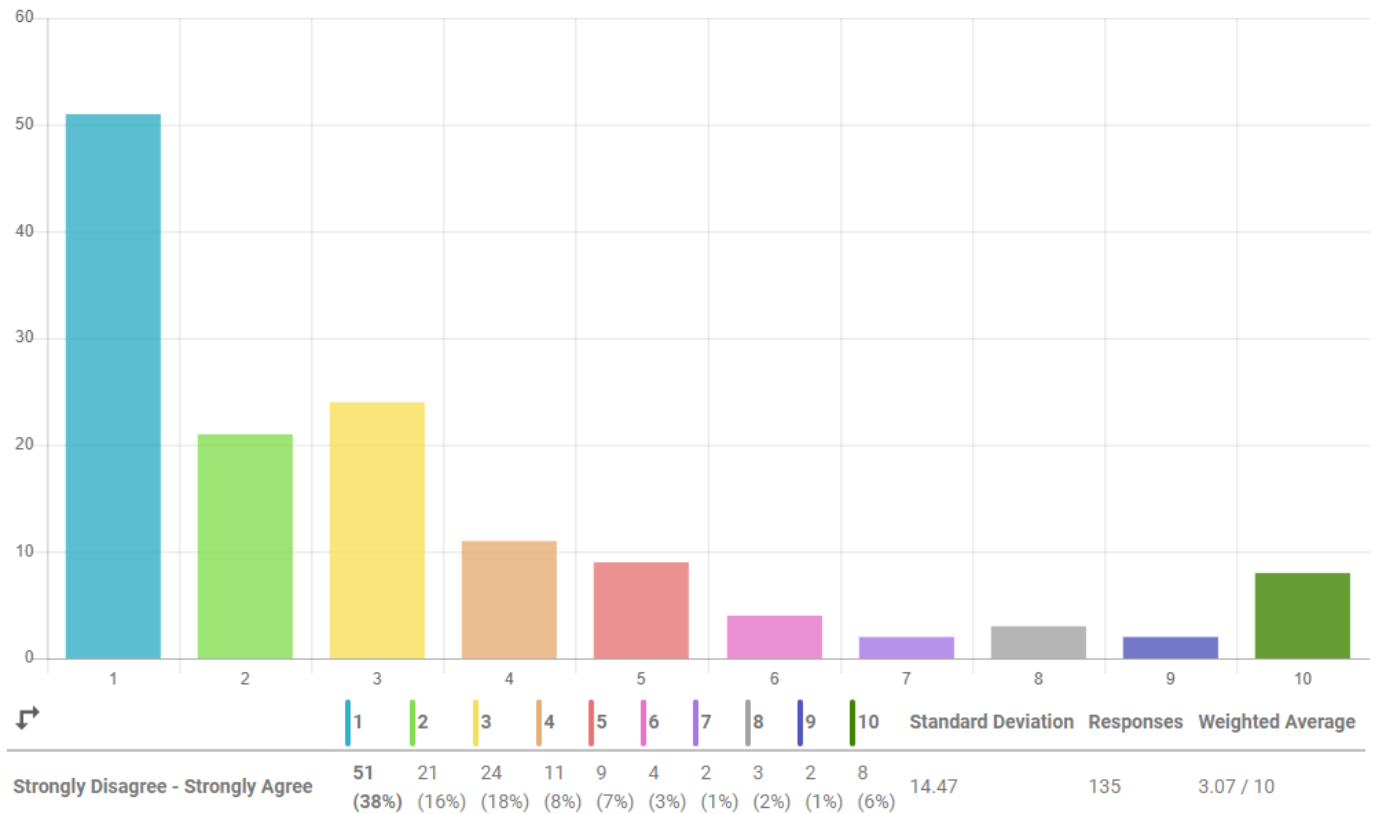
- failure to hold face to face meetings with residents with the pandemic used as an excuse not to hold physical meetings. This despite the common practice used by other businesses and organisations who held covid-secure meetings in this period
- webinars format, scheduling, recording and reporting were all flawed. The 'closed' format resulted in a complete lack of accountability and rigour with many questions remaining unanswered. Similarly, residents had to wait many weeks until the webinar on a given topic and Sunnica's failure to punctually upload their recording led to lack of relevant information.
- failure to reflect and amend their consultation period and process to reflect the fact that a second national lockdown was implemented
- continued delay in responding to written questions, which restricted resident's ability to understand the proposal properly in the allocated time.
- inability (or unwillingness!) to answer commonly held questions including decommissioning plans, the number of solar panels they'd be installing, battery details, traffic impacts.

We believe that our concerns regarding this lack of consultation are accurately reflected in the following results from a survey of Isleham resident undertaken in March - April 2021 (also see appendix 1 for personal comments)

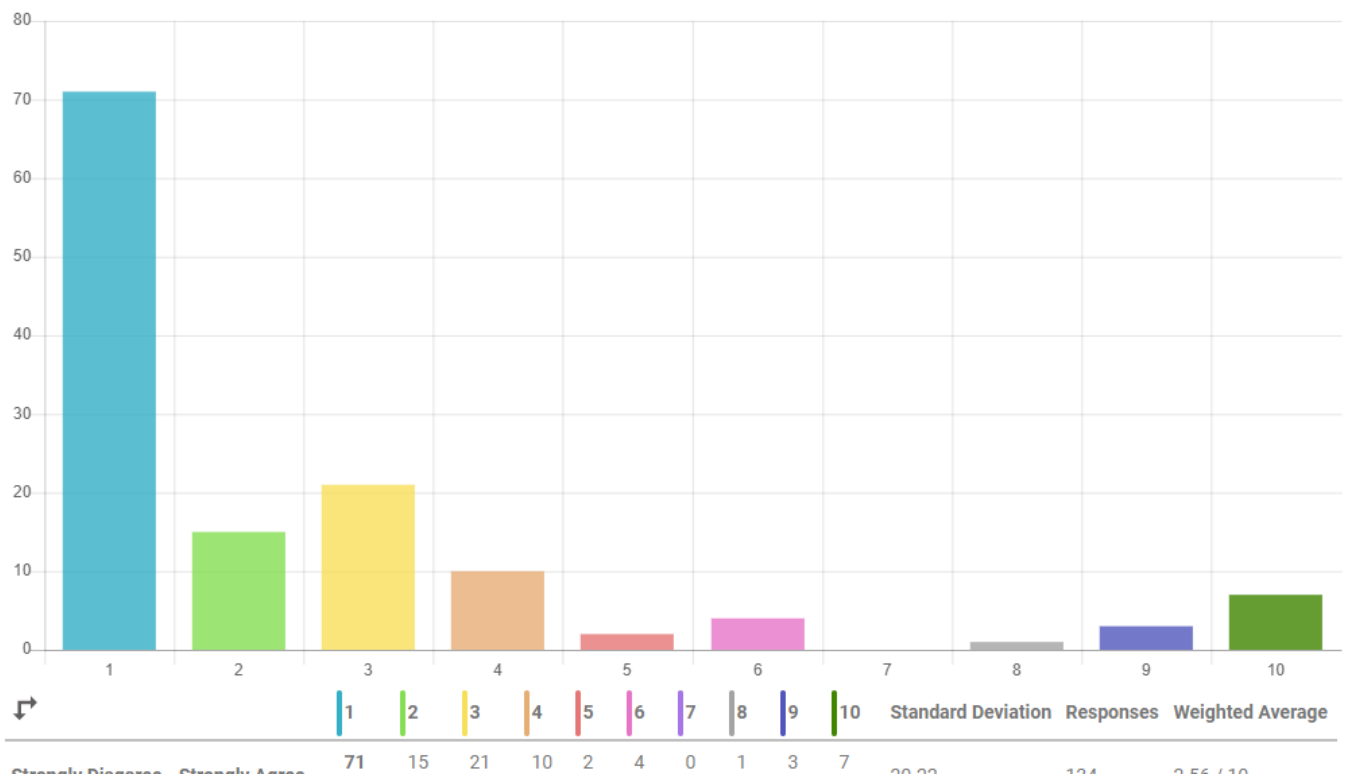
1 The information provided was easily accessible to you.



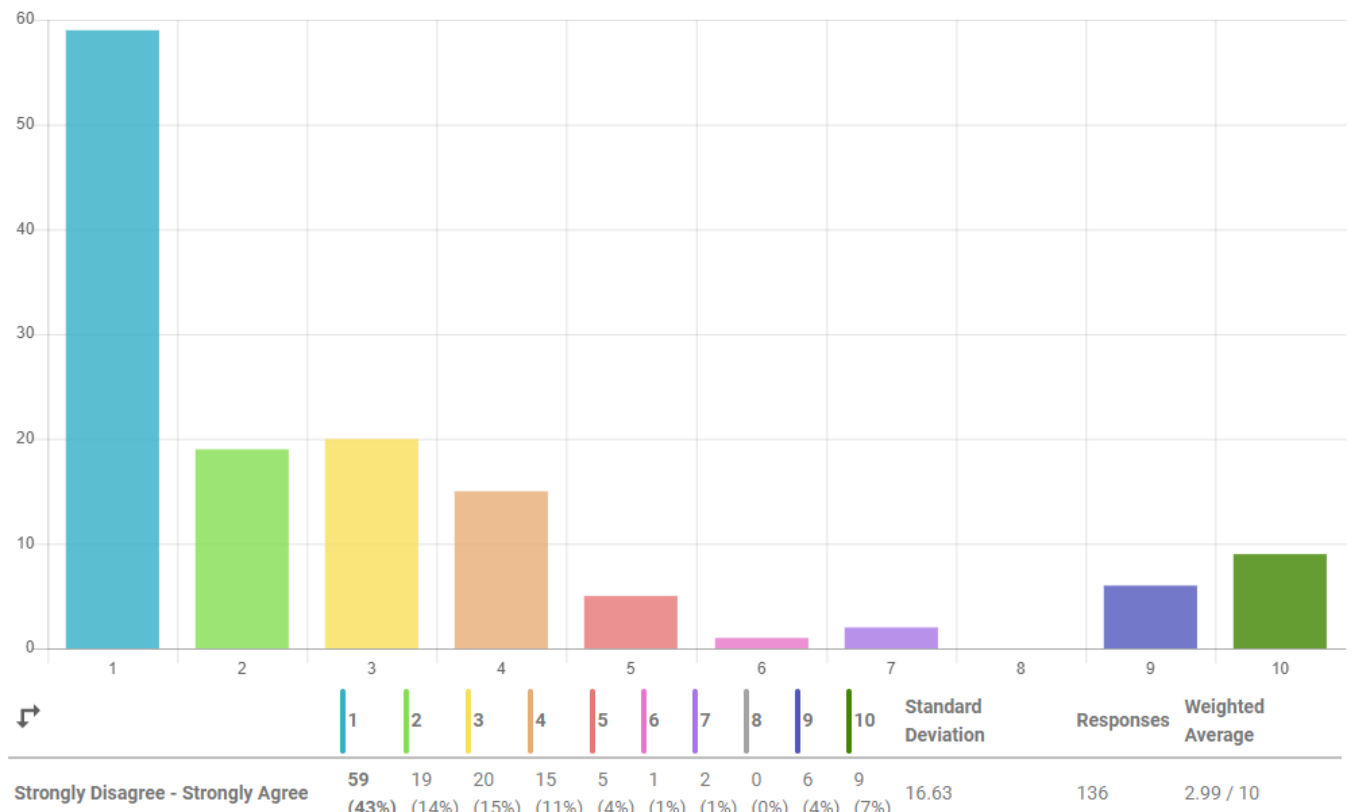
2 The information supplied was easy to understand



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

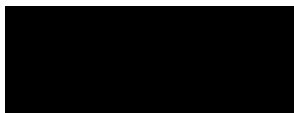


4 The consultation has helped you to respond to Sunnica's proposal.?



Full results from this survey can be found at: <https://freeonlinesurveys.com/r/dvIGf5J0>

Yours sincerely



Richard Liddington

Clerk to Isleham Parish Council

CC

Daniel Snowdon - CCC

Isaac Nunn - SCC

Mark Goldsack - CCC

Richard Rout - SCC

Josh Schumann - CCC / ECDC

Lance Stanbury lance4mildenhall@gmail.com

Julia Huffer - ECDC

Dr Nik Johnson - Mayor for Cambridge & Peterborough

Andrew Phillips - ECDC

Julie Barrow - WSDC

Appendix 1 Survey - Comments from residents regarding the consultation process.

Brochure information was easily accessed. But this only provided a very limited overview of the scheme. The webinars were difficult to engage with - poorly designed with lengthy introductions and no way to hold a "verbal conversation" as you could only ask questions using chat and some of these were either ignored or poorly answered
Isleham should have been given the chance to speak at open consultation - as this was NOT the case it just shows how little notice you (Sunnica) will take anyway
The information provided was superficial. I could not access the detailed PIR documentation to get clarity. I don't have internet access so was limited to the brochure. Solar should not cover fertile farming land. This is a green project that is flawed!!
Not enough information was provided. Lot's of questions were unanswered making it difficult to fully assess the impact of the scheme. The impact on the village of Isleham was not made clear as the site and scale was not discussed in the brochure
A shambolic exercise masquerading under the banner of a "consultation" using the excuse of Covid 19 for not providing face to face meeting for residents. A purely money making construction with no regard to the comments of anyone being affected by it.
Make them answer with the truth - not lies
No answers
It was not a consultation rather Sunnica telling people what they were going to do. A consultation is a two way discussion not one way.
The information packs were sent in envelopes that could easily be disregarded as junk unlike the recent Anglian water. The jargon was hard to get around and the whole process not lay person friendly. No open discussion, only response to questions, no rebuttal or further explanation/question possible.
This must not be allowed to be passed. I and my family strongly reject the use of arable farmland. The safety of the batteries and the ethical issues they raise. Sunnica seem to be bullying local business/land owners for their plight.
It's not a law to put solar on new builds so why use good food source instead
2800 acres!! Really!! On good farming land!? Who's going to clear away afterwards when it's out of date?? What about fire risk??
I feel this is a very underhand project . I've heard if people being threatened with compulsory purchase . . The project is far too big , and will dominate villages . Also there are more than enough solar projects in the U.K. . This is valuable farmland . If there's any kind I'd leak it could go into our drinking water There are no plans for disposal when it's life is over . The batteries are shown to be dangerous and no sensible reply has been made to this important question . Solar belongs on rooftops not taking land we need for food production , or ruining the beauty of our countryside ...solar is not even the governments priority wind and nuclear are . The two years when it is built will ruin our roads , be noisy and messy . There are no suitable plans for screening
Yes to solar power NO to Sunnica. If Sunnica were more open and answered questions put to them instead of ignoring them or fobbing people off, it may help. It's dangerous having huge battery packs anywhere near residential properties and I for one do not want to find out what happens when one of them catches fire and Sunnica are not even sure themselves what will happen when one catches fire, they are just left to burn, there is no way of putting the fire out and that means toxic fumes travelling all over our villages for days!!
This land is highly productive food growing land There are pieces of land that are not suitable for growing food but would be perfect for producing energy
Apart from 1 brochure containing soundbite snippets of Sunnicas proposal & a couple of displays at the village hall there has been no real awareness of their aims & objectives. The webinars & online activities have meant nothing to the many people without the technology or knowhow to take part. A significant body of people have been excluded from voicing their concerns. Many people believe it is already a done deal between the wealthy outsiders who have little regard for local residents.
Let's get on with renewables and stop nimbicism!
This project seems wrong on so many levels and going j der the COVID radar. It appears to be an environmental disaster in the waiting let alone during construction for the sake of hitting some green energy targets, at greater cost to the consumer and to line the pockets of the few who will most likely

renounce all responsibilities as the parent company is folded. If this is passed then it would be a travesty and would possibly smell of brown envelopes. Far better to incentivise micro generation on existing brown sites putting money into the consumers pockets (who would spend it) rather than this.
I managed to attend one of the webinars which I thought was badly setup. There was no means of two-way dialogue. I submitted many questions that were either not addressed or inadequately answered. There was no impartiality in the process. It would have made much more sense to involve a 3rd party "impartial" mediator to ensure questions were addressed and properly responded to. The whole process was farcical, biased and pointless.
Lots of unanswered questions, lots of missing information about the scheme. I was completely unaware of the scheme until I got the brochure. How can something so big and so close to Isleham be submitted without us all knowing and having proper time to respond? Having a single consultation, during a pandemic, made it really hard to discuss with fellow residents and to get answers to questions from Sunnica. Something that will completely change the landscape and local heritage cannot be forced upon us under the veil of a pandemic. It's appalling.
I feel I was only able to put in a response due to listening to others views locally and reading information not necessarily supplied by Sunnica.
I need to see how experts, such as Natural England, have responded. I do not trust the conclusions Sunnica have reached. They have a vested interest in progressing the scheme.
This is a dreadful project, driven out of financial greed rather than any 'Green' objectives.
I strongly appose living around a huge solar farm, attracting from the areas natural beauty.
The consultation has not allowed any 2 way discussion or the open questioning needed. The information provided was excessive and not easily understood
I have heard nothing from Sunnica. It is impossible to get informed or respond without any notification or information.
I live by the river Lark and am extremely worried about the increased speed at which the rain will run off the land without crops to soak it up and so cause my home, the access road, and the other 120 homes to be flooded.
This was a sham! The on line questions were avoided so that we did not get answers to our questions the on line consultation was controlled and no real meaningful dialogue has been granted. The whole process needs to be done again as localpeople have not been heard.
I like solar power. But it probably isn't a good idea to buy up peoples farmland if it is there entire business the livelihood. Buy half instead.
All correspondence has been difficult to understand and still no clear explanation to our concerns raised.
Stop taking our farm land away if you want to build solar farms go out in the sea
What consultation process? I don't Feel I have been consulted at all. Got a shiny booklet with a very one sided view on the benefits of solar.
Maps too small to read and understand
Actually getting a sensible response from Sunnica is next to impossible
The book had misleading pictures in it, and was not produced in such a way that it would show full extent of what Sunica planned to do, it appeared to be designed to deceive.
The middle of a pandemic is no time to put forward such a significant proposal - people are shielding and preoccupied with personal situations and trying to navigate through a difficult time. The proposal does not serve the best interests of our community.
The consultation was poor and not easily accessible for all residents. The booklet was not clear on the sites to be used and the maps were too small. The webinars were not widely publicised, no idea where the PEIR report is or what it contains. The pandemic has been convenient for Sunnica to avoid consulting us properly.
Good luck to sunnica
Strongly disagree with the compulsory purchase of land which forms part of LaHogue - providing a vital service to our rural community. Don't understand use of agricultural land instead of local brownfield sites. Don't understand the use of agricultural land so far from central hub in Burwell. There are a lot of elements of this project which don't make sense and have not been adequately explained during the so called consultation which our village has only belatedly been included in.

<p>What is a pair survey. ? We have not had a useful consultation, and none of the issues raised in the original letters have been dealt with. Sunnica have so far avoided all the important issues regarding this 2800 acre development. Which will have a major impact on the areas concerned . Why hasn't the government reacted to all the concerns raised on this issue, especially as its proposed to use farm land, which I think is illegal. Why does the project have to cover so many acres on such valuable productive land? And not on scrubland, such as heathland in and around Elvedon.? A proper consultation with ALL parties should be advertised and arranged for maximum attendance available by ALL villages concerned. Not on line. As it's unsafe due to covid it should be shelved until such time everyone can take part. NOT ON LINE. We need hard paper copies of all proposed plans, with ALL questions being Answered in full, not skimmed over, so as to scrutinise before ANY decisions are made. Why have SUNICA begun excavating in some areas , without permission.??what happens to, and who is responsible for, the dismantling, and disposing of all units when their life span is finished? This issue is far far away from being sorted.</p>
<p>The maps are too small to view properly. No local residents have been properly consulted. Taking away agricultural land. No prove of how the panels would be disposed of safely at the end of their time. Will look ugly in this flat open countryside.</p>
<p>Let's get cracking with green energy</p>
<p>One of things I found really annoying is that the booklet and website make it very unclear as to the exact areas they are planning to cover, the maps are far too small. Also a consultation should be a 2 way thing , getting people to send in questions without them being able to respond to the way Sunnica decide to answer in my mind is a lecture , not a consultation. Also Sunnica seemed to be happy picking and choosing which questions they wanted to answer, this wouldn't have been able to happen if meetings were held in real life e.g. via a presentation locally which could have easily been done outdoors in the Summer.</p>
<p>Do not want Sunica building here</p>
<p>A terrible situation for this village of Isleham that was taken completely by surprise and DEVASTATED that such an horrendous proposal would even be considered on the very edge of a thriving village on wonderful arable farm land</p>
<p>This had all been cloaked in mystery and I have seen no evidence that Sunnica have any genuine interest in local people's views</p>
<p>There should be proper meetings and debate, where the public can get real answers and uncover facts that have been either ignored or hidden</p>
<p>Due to the fact that we recently moved to Isleham we were not involved or contacted at all by Sunnica or made aware of the consultation.</p>
<p>So much has changed since the original presentation that it is a completely new proposal in the way it affects my village. No new presentation with the new boundaries. People at presentation had no information if you asked questions they only smiled and said that was an interesting point and then nothing further. I don't understand portals and planning applications. Assuming I do is insulting. Feels like a paper exercise to say they have done something. This is 400 metres from people's houses within the village.</p>
<p>I received nothing directly from Sunnica, everything was passed on from other residents. The information available seems minimal and what information there was it was biased in favour, especially on the environmental impacts of this scheme</p>
<p>Nothing. Change needs to happen.</p>
<p>Webinars were very difficult to attend. Late starting so ran into meal times and questions not answered.</p>
<p>Don't cover our fields with solar panels...put them on the properties and industrial units so we can grow food in the fields to eat and survive. The battery units don't have a long life, where and how are you going to remove and dispose of them safely? The impact on wildlife should be deeply considered! Again put the panels on property/buildings etc not fields PLEASE</p>
<p>Webinars only reached a small amount of the community. Webinars did not have the ability to have a two way conversation. Controlled entirely by Sunnica didn't answer all the questions put forward. Misleading brochure. Did not have a safety plan in place re Batteries. So many question refer back to pier, 900 odd page document. Needs to wait until pandemic is over so villages can have local exhibits. I could go on.</p>
<p>Isleham residents were not included in the original consultation. Sunnica have not answered any of the questions I have asked of them. The webinars were all at inconvenient times for working parents & were a</p>

waste of time as Sunnica wanted questions sent in advance but even then did not answer them or skirted around them with no chance for the public to reply
Needed on this poor land.
The process didn't allow for people without Internet access or technological expertise. The online 'Consultation' was time-consuming and confusing, demanding considerable cross-referencing of PEIR reports. It wasn't very user-friendly. The 'Consultation' didn't allow for proper interaction, so it was unfair to residents. The booklet didn't provide basic information about the size and scale of the project, or the size of or dangers attached to the Battery Compounds. It wasn't clear about how Site East A would be accessed. The whole thing was very disappointing and left me feeling very frustrated that I couldn't voice my objections fully.
Sunnica has totally disregarded residents objections to this proposal. They are using bully boy tactics to endeavour to get their own way. This project will totally destroy the natural environment and take away vital agricultural land.
Feels like it's been slid under the carpet.
Not helpful at all
There was very little actual detailed info on the scheme to make an informed judgement. Too many unknowns about the proposal or future management plans.
Against Sunnica
Get it built we need green energy.
I feel this organisation has not handled the consolation well .It seems that the whole procedure consisted of them saying bits and pieces of the truth and lots of information came to light in drips and drabs that would have appeared to have been kept secret They just can't be trusted and goodness knows how things will be changed by them if this scheme is forced upon us
Stop the loss of so much country land.
Consultations haven't been done properly people have not been able to put there views over face to face
We were added to the. Consultation late and I do kit feel that the information provided by Sunnica has been open and honest. It was not easy to join zoom meetings due to times being when most people were at work. We have been unable to ask questions or respond to them on zoom and questions I have asked have been ignored. My response to the consultation was returned along with my husbands and my mothers saying it was sent in too late when it was posted in November
The full consultation did not include Isleham residents and when it was conducted it was online only which limited access and the ability to properly assess the propasal
Isleham included at last minute so Sunnica is trying to push this through without residents being aware how it affects the village.
The booklets posted had a map in it that was hard to read and fathom where exactly panels would be placed. Facebook posts with regard to the project were placed on a page with a business name that was not Sunnica so very hard to find if you didn't properly research. Online 'consultation ' meetings were composed of the company answerbig questions they wanted to with no chance of the person asking the engaging further , not a two way process of a 'consultation ' at all. They have now gone on to bullying tactics to get onto land to do site surveys, not exactly the actions of a company that really wants to engage with the community!
They couldn't answer basic questions when they held their "exhibition" at The Beeches over a year ago.
They seem to have made it extremely difficult for us to ask the most important questions.
This is a rubbish survey. We do not want these solar panels. We live in the country for a reason and it is not to see solar panels. Or ha e lots of electricity flying around
Will this consultation process even matter?? Are you likely to change or cancel your plans as a result? If not, then come clean and admit it and stop this sham. I'd like to have a real conversation about the scale of these sites!! Why aren't you putting them on concrete or roofs? Why on green land?
I think this project should go ahead
I don't want to live in a power plant.
Lack of communication from Sunnica and has answered no real questions brought up. Doesn't seem to care what local people who will have to live with it think about the project and how negative it's going to effect them.
Sunnica have done tgere very best to get s very questiona ble project through, under the radar.

Very late in the day postal info. Glossy brochure didn't address common concerns. Whilst renewable energy is vital this proposal will lock many villages into an industrial area. If there is not more consideration of this impact with loss of vital agricultural land in 30 years we will all look back and wonder why we are unable to produce sufficient crops and where there is little flora/flora and countryside left.....

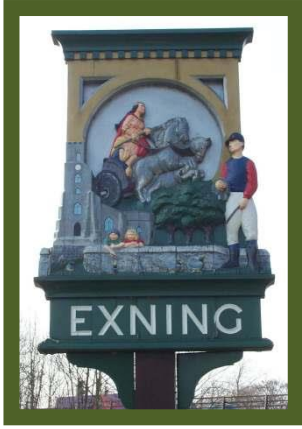
This plan will be detrimental to our farming and vegetable trade.. also the impact of our wildlife

I feel that the consultation was carried out in unpresented times, and the way they carried out the consultation was totally inaccessible to myself be my family.

The consultation response form online was hard to use and once submitted there was no confirmation that it had been received- nothing to say it has been recorded. At the webinars Sunnica often wouldn't/didn't answer difficult questions and were rude and dismissive. It is hard to trust anything they said in their booklet when simple facts (eg quality of farmland) were quoted wrongly and in their favour. The company have been aggressive and threatening to local residents with regard to access for their surveys.

It seems that Covid has helped Sunnica's cause by not being able to come to the area and meet people and face their views.

I was completely unaware of the scale of this proposal till people started posting about this. This was not gained from any Sunnica information. It is extremely concerning that this kind of huge proposal is attempted to be pushed through whilst in lockdown. Whilst lots of people have a lot on their plate as it is.



FROM THE OFFICE OF THE CLERK TO
Exning Parish Council
4 Church Close, Exning, Newmarket, Suffolk, CB8 7EJ
[REDACTED]
EMAIL: clerk@exning-pc.gov.uk
www.exning-pc.gov.uk

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

16th May 2021

Dear Council

Sunnica Statutory Consultation

Exning Parish Council would like to inform you that it finds that Sunnica's Statutory Consultation was inadequate and requests that this letter and accompanying document are shared with the Planning Inspectorate as part of the Council's 'Adequacy of Consultation' representation.

Exning Parish Council is a member of the Parish Councils Alliance – Sunnica Group and endorses the list of inadequacies found by this group; a copy attached.

Exning Parish Council is also particularly concerned about the amount of good quality farming land is included in this proposal.

Regards,

[REDACTED]
Cathy Whitaker
Clerk to Exning Parish Council

Enc.

cc: Brian Harvey (WSC)
Andy Drummond (WSC)
Simon Cole (WSC)
Rachel Hood (SCC)

Inadequacy of Consultation

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

Lack of Access to Information:

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

Government's COVID-19 safety guidelines during the first 7 weeks or so of the consultation period. It was possible for Sunnica to design a safe event for each village, particularly at the beginning of the consultation period. They were asked several times to do this during their webinars, but they chose not to.

- Villagers reported difficulties with the consultation booklet maps at a small scale. They were unclear and difficult to read. Small font size was used in the brochure, making it difficult for visually impaired residents to interpret or measure e.g. distances from their homes to the edge of the scheme boundary etc. Maps such as Sunnica East Site A and B Parameter Plan on page 9 show no village names, road names or other landmarks, meaning they must be read in conjunction with other maps which is difficult to manage given the reader may also be using magnifying lenses. Large format maps are required for villagers to comprehend the boundaries and features of the scheme and need to be supplied by the applicant. Sunnica could easily have placed some large-scale maps and other information displays in e.g. village halls for people to go and look at – even if these information displays were not manned by Sunnica.
- Consultation booklets were delivered in plain white envelopes addressed to “The Resident” without any mention of Sunnica on the outside (including the return address). Some people mistook these for unwanted marketing materials and discarded them. This point had been raised during the Non-statutory Consultation (which was publicised in similar plain envelopes), but the problem was repeated during the statutory consultation.

Webinars

- Lengthy time delays with the webinars being presented and the recordings uploaded onto websites. This took up a significant portion of the consultation period. The consultation started on 22nd Sept. The first webinar was not until 1st October. Thereafter, webinars were held on 3rd/8th/10th/15th/17th October, each focussing on a different topic. During the first 30-45 mins of each of these webinars Sunnica introduced the scheme. These introductions to the topics could have been pre-recorded and made available online at the very beginning of the consultation period (i.e. from 22nd Sept). Unfortunately, because of the way Sunnica chose to schedule its webinars, it meant that anyone wishing to hear e.g. the webinar on Construction and Operations (which first aired on 17th Oct) had to wait almost one month until the webinar on this subject was available. And anyone who missed the ‘live’ webinars then had to wait a further week or more before they could access the recorded version. Had the introduction for the various elements of the scheme been recorded and made available from the beginning, it would have meant that the ‘live’ webinars could have focussed on the questions and answers, which is ultimately what ‘consultation’ is all about. This would also have made the webinars more manageable from a time perspective, and would have allowed people to prepare questions in advance, on all topics. This would have also made it easier to ask questions across all topics in each of the webinar sessions, rather than the questions being ‘funnelled’ in a topic-specific manner, which limited opportunities for broader questions to be asked.
- Some of the webinars had very poor sound quality. The recorded versions should have been made available online immediately – not over a week later (thus further eating into the time allowed to consider the scheme).
- The webinar format itself was completely inadequate as a means of ‘speaking’ with residents. There was no facility for meaningful dialogue between the people asking and answering a given question. Sunnica could have easily replicated the format used by Lucy Frazer MP, Matt Hancock MP, Brian Harvey (Chair of WSC) etc, who all held excellent Zoom meetings about the Sunnica proposal – these Zoom meetings allowed a proper 2-way dialogue to take place, and ensured that residents’ questions were fully understood and answered. Instead, Sunnica chose to do a 1-way only webinar format in which

questions had to be either submitted in advance or via a chat function during the live webinar. This allowed them to pick which questions they wanted to answer (and they did not answer all). It also meant that if the question was misinterpreted/ not fully understood, there was no means of clarifying it. Or if the response was incomplete or unsatisfactory, there was no way of coming back to it. So anyone asking a question did not necessarily get the answers they needed. Sunnica said that they chose this format for GDPR reasons, which seems a rather 'flimsy' excuse. Privacy issues can easily be addressed by the individual attendees choosing to enable video or not, use an anonymous name etc.

- The Say No to Sunnica community group summarised three webinar meetings and they show that over 50% of the non-administrative questions were not answered fully.
- Webinars were poorly attended, reinforcing the comments above about their unsuitability as a means of consultation. During the first series of webinars, fewer than 25 connections were made while the event was being transmitted and questions could be asked online.

Inadequate Time to Review Information

- Consultation started as the Covid-19 pandemic was escalating again after the first national lockdown. During the consultation, a second national lockdown was introduced. This 4-week national lockdown was not adequately compensated for by the 16-day extension to the consultation. The lockdown further reduced people's already limited access to information. In addition, the scheme boundary was modified yet again during this lockdown (on 9th Nov) making it even more difficult to properly consult as the scheme changed part way through the process.
- Isleham and West Row areas were added to the scheme boundary very late (additional land was added just ahead of the statutory consultation starting) so these villages did not realise the huge impact the new scheme boundary would have on their villages. The Sunnica website was not updated with these changes until the statutory consultation started. So these villages effectively had no 'pre-consultation' or pre-warning about the new boundary and had very limited time to learn about the new scheme proposal, made even more difficult during the pandemic. (Example: Ely Standard article dated 28th August 2020, just over 3 weeks before the consultation started. The article shows the scheme boundary as having 3 sites, stating that Isleham is only affected by cabling routes. This article was based on information taken from the Sunnica website at that time.....and then contrast this to the reality that was introduced to Isleham via the consultation booklets just a few weeks later [Huge solar plant moves to stages in East Cambs | Ely Standard](#)).
- Councils were given insufficient time to consider the Statement of Community Consultation (from 3rd Aug-1st Sept 2020) during the pandemic. Difficult to achieve when staff are ill/ working remotely etc.
- NSIPs normally have several rounds of statutory consultation before the application is submitted. This makes sense as it allows for as many details as possible to get answered / be decided before the application proceeds. A second round of consultation is essential to properly review the Sunnica scheme and the impact it will have locally.
- Statutory bodies found it difficult to respond in time due to working from home during the pandemic, staff illness etc.
- Sunnica was very slow in replying to written questions, blaming the pandemic. This prevented residents being able to understand the proposal properly in the allocated time. Many official departments (council offices, planning depts, government depts, etc.) also had long response times due to the pandemic, which further delayed residents obtaining information to assist their understanding of the development.

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

- There were many questions that Sunnica were unable/ unwilling to answer during the consultation despite being asked repeatedly throughout the consultation period. Examples include details of decommissioning, details of batteries (battery type, battery number, outline safety plans etc), details as to how they have assessed the land grade, details of job losses, traffic impact and road damage, etc. Sunnica chose not to divulge the alternative sites they have allegedly considered (they said they had a list of alternative sites but that they were unwilling to disclose it at this stage). Lucy Frazer MP also requested some of this 'missing' information on behalf of residents, and was also denied by Sunnica. Much of this 'missing' information has been summed up in the excellent joint consultation response document by EDC/CCC/WSC and SCC. So much of this information is key to making an informed decision about the scheme and the impact it will have for local residents. It is therefore imperative that residents have a further round of consultation to allow more of these questions to be answered. Particularly now that the Covid-19 vaccination programme is well underway, so this could take place in the not-too-distant future, possibly with some face-to-face meetings.
- Instead of giving details, Sunnica made multiple references to working within 'The Rochdale Envelope.' This principle expects applicants to be able to state the worst-case scenario of many relevant factors for public discussion i.e. environmental impact, safety. But worst-case scenarios were not provided by Sunnica – just an omission of detail. We therefore need a second round of consultation so that these details may be considered. As stated in the Planning Inspectorate's guide to using the Rochdale envelope ([Advice-note-9.-Rochdale-envelope-web.pdf \(planninginspectorate.gov.uk\)](https://www.planninginspectorate.gov.uk/advice-note-9-rochdale-envelope-web.pdf)), *the assessments should be based on a cautious 'worst case' approach; the level of information required should be: "sufficient information to enable 'the main,' or the 'likely significant' effects on the environment to be assessed."* This is clearly not the case with the Sunnica scheme and the absence of any detail about batteries, alternative sites, decommissioning etc. The Rochdale envelope guide also states that, *"The need for 'flexibility' should not be abused - this does not give developers an excuse to provide inadequate descriptions of their projects."* We feel strongly that Sunnica's descriptions are inadequate.
- The site boundaries in the scheme have not been fully decided – it is difficult to assess a scheme when the boundaries are still subject to so much change. (Examples: late addition of land area close to Isleham just before the statutory consultation began; recent withdrawal of La Hogue land from the scheme; landowners along the current proposed cable route are resisting access, so these routes may not be the ones used, etc). The landowners whose land is contained in the scheme have not signed agreements with Sunnica – this makes the scheme very fragile and fluid and difficult for residents to comment on.
- As Sunnica is prepared to use compulsory purchase powers, what other land are they considering compulsory purchasing? The scheme boundaries could be anywhere if this principle is allowed to develop. If Sunnica is going to try and compulsory purchase land they must say what land and how will they fund the purchase. This needed to be stated in the consultation.

Misleading Statements and Claims/ Poor Advertising

- Misleading images in the consultation brochure (shows panels of around 1.5m high). No information in the brochure about the sheer scale of the scheme, and how this compares to the more usual solar farms we have come to know in this area. It implies that the scheme is 'just another' solar farm (typical size for this area is around 25-150 acres, not ca. 2800 acres!)....when it is clearly of a very different magnitude and this needed to be highlighted. If approved, this would be the largest solar plant in Europe – but this is not mentioned anywhere in the brochure, or in the SoCC.
- In the brochure introduction the proposal is introduced as, "a new solar energy farm and

battery storage facility connecting to the Burwell National Grid Substation in Cambridgeshire.” No mention of the exact location. No mention of the fact it is so huge it spans 2 counties. No mention at all of Suffolk....so residents in Suffolk will not have considered this relevant to them.

- Failure to mention key information about how the scheme will actually operate, which fundamentally changes residents' understanding of the scheme and is very different to the 'usual' solar farms that we have in this area. I.e. no mention of the fact that the huge batteries are intended for 'energy trading' of solar, other renewable and fossil fuel energy types. This aspect of the scheme throws up additional questions (such as why do the batteries need to be stored so far from the Grid, and so close to residential areas, if they are used for trading energy in and out of the Grid? How much energy is lost during the transfer of this energy, especially along such vast cabling routes, etc etc). This aspect in itself requires a second round of consultation as the overwhelming majority of residents are unaware of this, the crux of the entire scheme.
- Feedback from the pre-consultation process (during which the proposal did not include land at Isleham and West Row) was that the scheme was too big. Misleading statements appeared in the statutory consultation brochure that the scheme was made 'smaller' as Sunnica had taken the feedback from the pre consultation into account. This is not true. The current scheme boundary change was due to a landowner in Freckenham withdrawing his land, thus forcing Sunnica to look for alternatives. The alternative that they chose (near Isleham and West Row) meant that 1 site had to be split into 2 'smaller' sites, but this does not affect the overall size of the scheme. In fact, it makes it even more unpalatable as it requires additional cabling routes to connect the patchwork of solar sites together. Other claimed 'reductions' included amendments relating to preliminary environmental and archaeological findings - not as a result of listening to community feedback (as indicated by Sunnica).
- Consultation notifications in local newspapers were written in the small print at the back of the newspapers – these are not widely read (see photograph example below from the Newmarket Journal). Again, no mention of the scale / location was given in the adverts. Whilst this might meet their 'bare minimum' statutory obligations, Sunnica has an **award-winning communications company** working on their scheme, so it is very disappointing that they could not have found a more effective means of advertising the consultation...through local village publications, community Facebook groups etc. These are much more widely read by the local residents, particularly during a pandemic. The village publications (e.g. Informer in Isleham, Turnpike in Red Lodge, etc) are hand delivered to every household in the directly affected villages and would have been a far more effective way of engaging with residents about the consultation.
- Sunnica did run a small number of 'panel adverts' in a few local papers, but these again used very small white text on a dark background, making them difficult to read. And the same description for the scheme was used as discussed earlier in this document (i.e. no mention of the scheme being in Suffolk, no mention of it being a NSIP, no mention of the size, location, etc. etc.). Many residents (especially in Suffolk) would therefore not pay any regard to these. Surely the point of advertising is to draw the attention of *all* affected people to what the proposal actually is and to attract their engagement. Their newspaper adverts did no such thing. Sunnica also claimed during one of their webinars that they ran a paid Facebook campaign resulting in several thousand-page impressions – but we are not aware of any of the village FB community pages getting any 'hits,' so it's unclear who the recipients actually were.
- No physical advertising in the form of posters and banners was available in the villages until Freckenham Parish council requested these 5 weeks into the consultation. Even then, only

1 small banner was sent per village. More banners/ posters/ placards etc were needed to draw attention to the consultation – one solitary banner per village has practically no impact. And by the time the banners arrived and were put in place we were in a second national lockdown, meaning that residents were not moving around the villages, so didn't see them. The banners also had incorrect dates on them, which were never changed. The use of banners agrees with the adopted West Suffolk Council Statement of Community Involvement on "Line of sight publicity" as recommended by Advice Note 2 from the Planning Inspectorate, Section 5.3 "A local authority's adopted Statement of Community Involvement (or Community Involvement Scheme in Wales) is likely to have a bearing on its response to the developer's SoCC Consultation." (https://www.westsuffolk.gov.uk/planning/Planning_Policies/upload/18-12-20-SCI-adoptedversion.pdf) (https://infrastructure.planninginspectorate.gov.uk/wpcontent/uploads/2015/03/Advice_note_2.pdf).

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

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

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

Statement of Community Consultation (SoCC)

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

mean to build a whole new town.

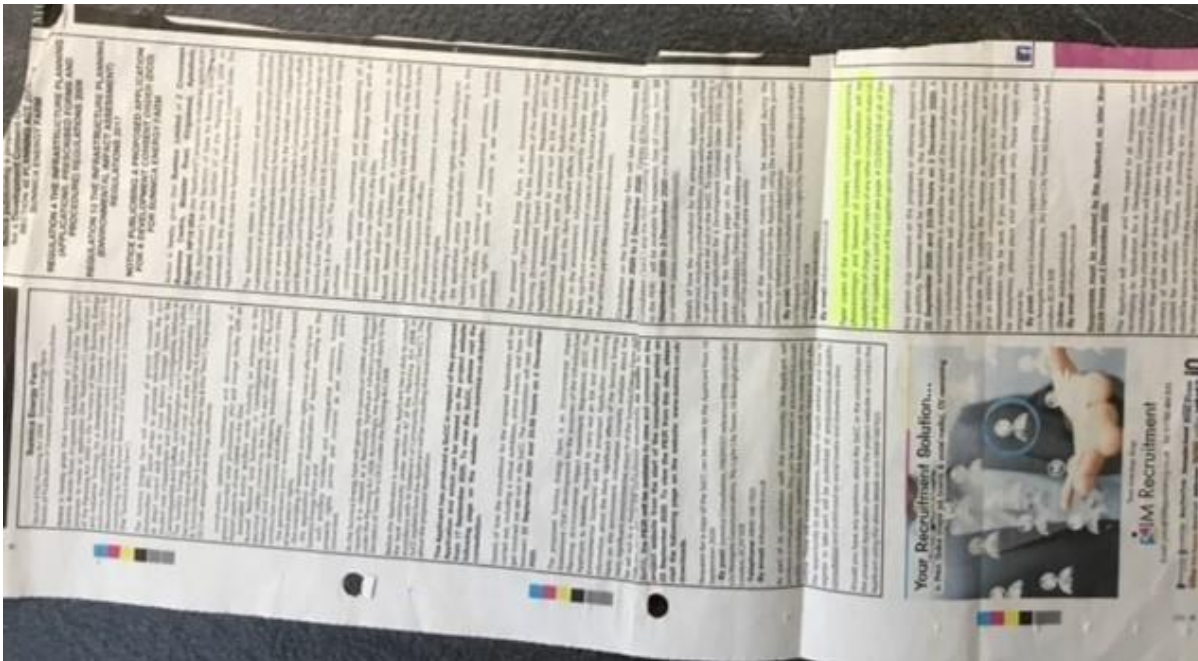
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- It specifically states in SoCC that locals will be asked to consult on: Operational impacts, Impacts from decommissioning - but there is negligible information provided on these. Sunnica instead stated during a webinar that it’s decommissioning plan will be put together 6 months prior to decommissioning taking place, so they had very little detail at this stage. How are we, therefore, expected to consult on this? Not even a ‘worst-case’ scenario was provided. No details about how it might be decommissioned, which parts are likely to be decommissioned, no detail at all on how the land is meant to be restored to “it’s previous condition” (which is unlikely given the potential soil damage resulting from this massive scale construction project). How are people meant to form a view of the legacy we will be left with after this scheme ends with no detail provided on which to consult?
- In the SoCC it also specifically states that the public will be asked for views on the PEIR. As mentioned previously, this was not made available to all residents, so how can they be consulted? Sunnica said the PEIR was too big to put onto DVD, so anyone without a computer/ internet access cannot see it. In the SoCC it states that hard copies will be available on request – but at a charge of 35p per sheet as mentioned previously. This is discriminatory. Sunnica was requested multiple times in the webinars to provide hard copies of the PEIR in the villages....but this was not honoured. Chippenham and Freckenham got partial copies (the main document, but none of the supporting appendices). Isleham and Snailwell did not receive any hard copy at all. And even if the villages did receive a partial hard copy, it was close to/ during the 2nd national lockdown and couldn’t be accessed. This document is a key part of the consultation and should have been made available in villages right from the very beginning of the consultation period. The Planning Inspectorate “Guidance on procedural requirements for major infrastructure projects” suggests, *“Applicants should engage proactively with local authorities and local communities to find alternative means to provide access to the documentation where required, to ensure on-going fair participation in the planning process, for example by providing copies of documents on a USB flash drive where parties have access to a computer but have limited or no internet access or, where reasonably practicable, by making copies of documents available for inspection free of charge where a person is unable to access the documentation electronically or finds it difficult to do so.”*

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- ECDC councillors have already complained about the “woefully inadequate and laughable” consultation ([East Cambridgeshire District Council - YouTube](#) relevant meeting, Sunnica starts about 2 hours in [East Cambridgeshire District Council, Planning Committee 2nd September 2020 - YouTube](#)
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- Despite claims in the SoCC, ECDC councillors said that 3 Cambridgeshire Parish Councils that are directly affected by the scheme have had NO direct contact from Sunnica. (Ely Standard Newspaper article Sept 2020: ECDC councillors [‘Man up’ and start talking energy firm told](#)).
- Suffolk councillors requested further information so that people can make an informed assessment of the scheme. Comments such as, “At this stage of the process we have many questions to which the answers are not entirely clear, so it’s appropriate at this stage to take these issues to the developer.” And “The sheer scale of the project means its impact will be significant and very far-reaching (<https://www.eadt.co.uk/news/suffolk-councils-sunnica-solar-farm-response-6547654>

- Freckenham Parish Council – sent letter to Sunnica on 9th Oct outlining many concerns about the inadequacy of the consultation. Sunnica declined to offer additional support for most of the concerns raised ([9.10.20-Sunnica-stat-consultation-complaint.docx.pdf](#) ([suffolk.cloud](#)))

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



Example of 'Panel Ad.' Bury Free Press

Public consultation

22 September 2020 – 2 December 2020

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

Find out more

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

1. Going to our website, sunnica.co.uk/public-consultation
You can view all the documents we are publishing as part of the consultation as well as a virtual public exhibition there.
2. Contacting us to request a copy of a booklet summarising the proposals and a consultation questionnaire.

3. Viewing a series of webinars we will give about the proposals online. These will offer the opportunity to ask questions about the proposals. You can find a list of all of the webinars and register to take part at sunnica.co.uk/public-consultation
4. Booking an appointment to speak to the project team individually. You can book the appointment using the contact details in this advert.
5. Contacting us directly using the details below.

Contact us

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

Alternatively, you can write to us at: Sunnica Consultation, FREEPOST reference RTR8-LUUJ-AGBY, c/o Newgate Communications, Sky Light City Tower, 50 Bevington Street, London, EC2V 6DE

Worlington Parish Council

Parish Office, 3 Scott Avenue, Mildenhall, Bury St Edmunds, Suffolk IP28 7LT

worlingtonparishcouncil@live.com

6th July 2021

Dear Sirs,

Worlington Parish Council would like to raise concerns that many of our residents found that Sunnica's Statutory Consultation was inadequate.

We request that this letter and accompanying documents, are shared with the Planning Inspectorate as part of the Council's "Adequacy of Consultation" representation during the Acceptance phase. This request is per paragraph 7.1 of the Planning Inspectorate's Advice Note 2 "The role of local authorities in the development consent process".

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

Finally, Worlington Parish Council carried out a household survey, that was sent to all households in Worlington, on the Sunnica Statutory Consultation, using four standard questions supplied by the Parish Councils Alliance, Sunnica Group. The survey results are also attached.

Yours Sincerely,

Vicky Bright (CiLCA)

Clerk, Worlington Parish Council

Inadequacy of Consultation – bullets

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

Lack of Access to Information:

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

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

Webinars

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

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

Inadequate Time to Review Information

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

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

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

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

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

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

Misleading Statements and Claims/ Poor Advertising

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

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

- Consultation notifications in local newspapers were written in the small print at the back of the newspapers – these are not widely read (see photograph example below from the Newmarket Journal). Again, no mention of the scale / location was given in the adverts. Whilst this might meet their 'bare minimum' statutory obligations, Sunnica has an **award winning communications company** working on their scheme, so it is very disappointing that they could not have found a more effective means of advertising the consultation...through local village publications, community Facebook groups etc. These are much more widely read by the local residents, particularly during a pandemic. The village publications (e.g. Informer in Isleham, Turnpike in Red Lodge, etc) are hand delivered to every household in the directly affected villages and would have been a far more effective way of engaging with residents about the consultation.
- Sunnica did run a small number of 'panel adverts' in a few local papers, but these again used very small white text on a dark background, making them difficult to read. And the same description for the scheme was used as discussed earlier in this document (i.e. no mention of the scheme being in Suffolk, no mention of it being a NSIP, no mention of the size, location, etc. etc.). Many residents (especially in Suffolk) would therefore not pay any regard to these. Surely the point of advertising is to draw the attention of *all* affected people to what the proposal actually is and to attract their engagement. Their newspaper adverts did no such thing. Sunnica also claimed during one of their webinars that they ran a paid Facebook campaign resulting in several thousand page impressions – but we are not aware of any of the village FB community pages getting any 'hits,' so it's unclear who the recipients actually were.
- No physical advertising in the form of posters and banners was available in the villages until Freckenham Parish council requested these 5 weeks into the consultation. Even then, only 1 small banner was sent per village. More banners/ posters/ placards etc were needed to draw attention to the consultation – one solitary banner per village has practically no impact. And by the time the banners arrived and were put in place we were in a second national lockdown, meaning that residents were not moving around the villages, so didn't see them. The banners also had incorrect dates on them, which were never changed. The use of banners agrees with the adopted West Suffolk Council Statement of Community Involvement on "Line of sight publicity" as recommended by Advice Note 2 from the Planning Inspectorate, Section 5.3 "A local authority's adopted Statement of Community Involvement (or Community Involvement Scheme in Wales) is likely to have a bearing on its response to the developer's SoCC Consultation."
(https://www.westsuffolk.gov.uk/planning/Planning_Policies/upload/18-12-20-SCI-adoptedversion.pdf)
(https://infrastructure.planninginspectorate.gov.uk/wpcontent/uploads/2015/03/Advice_note_2.pdf).

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

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

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

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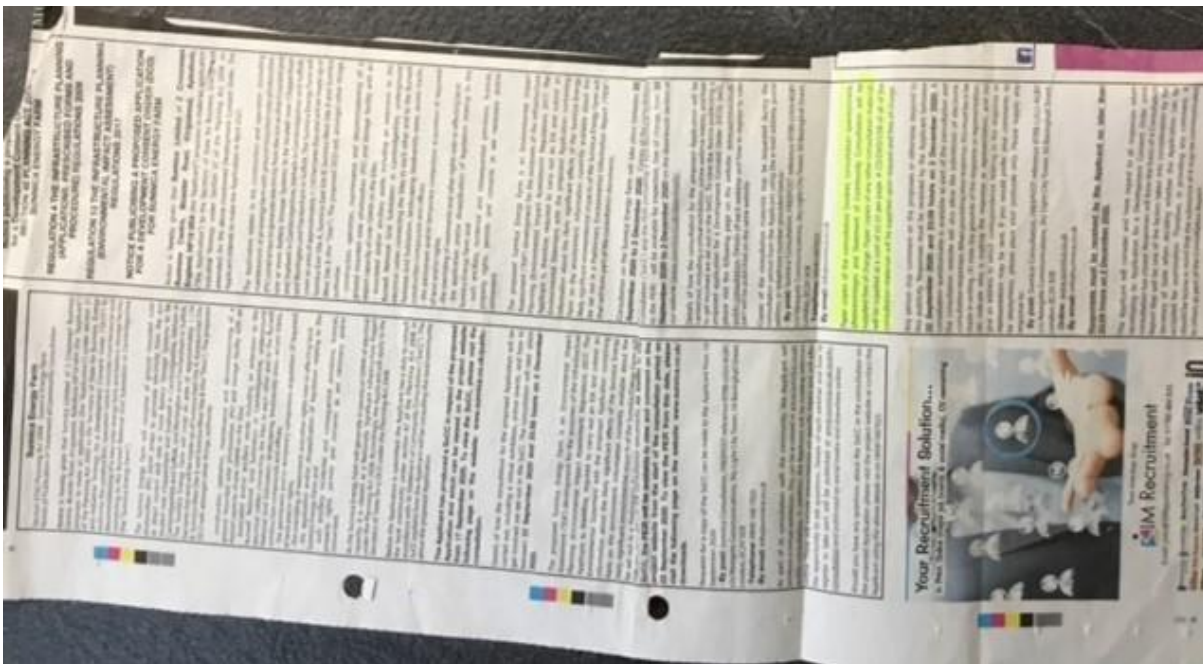
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- [Say No To Sunnica - YouTube](#) – WSC Councillor describes the consultation as 'farcical' (listen to 3.01 mins)
- Despite claims in the SoCC, ECDC councillors said that 3 Cambridgeshire Parish Councils that are directly affected by the scheme have had NO direct contact from Sunnica. (Ely Standard Newspaper article Sept 2020: ECDC councillors ['Man up' and start talking energy firm told](#)).
- Suffolk councillors requested further information so that people can make an informed assessment of the scheme. Comments such as, "At this stage of the process we have many questions to which the answers are not entirely clear, so it's appropriate at this stage to take these issues to the developer." And, "The sheer scale of the project means its impact will be significant and very far-reaching (<https://www.eadt.co.uk/news/suffolk-councils-sunnica-solar-farm-response-6547654>
- Freckenham Parish Council – sent letter to Sunnica on 9th Oct outlining many concerns about the inadequacy of the consultation. Sunnica declined to offer additional support for

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

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



Example of 'Panel Ad.' Bury Free Press

Public consultation

22 September 2020 – 2 December 2020

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

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

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

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

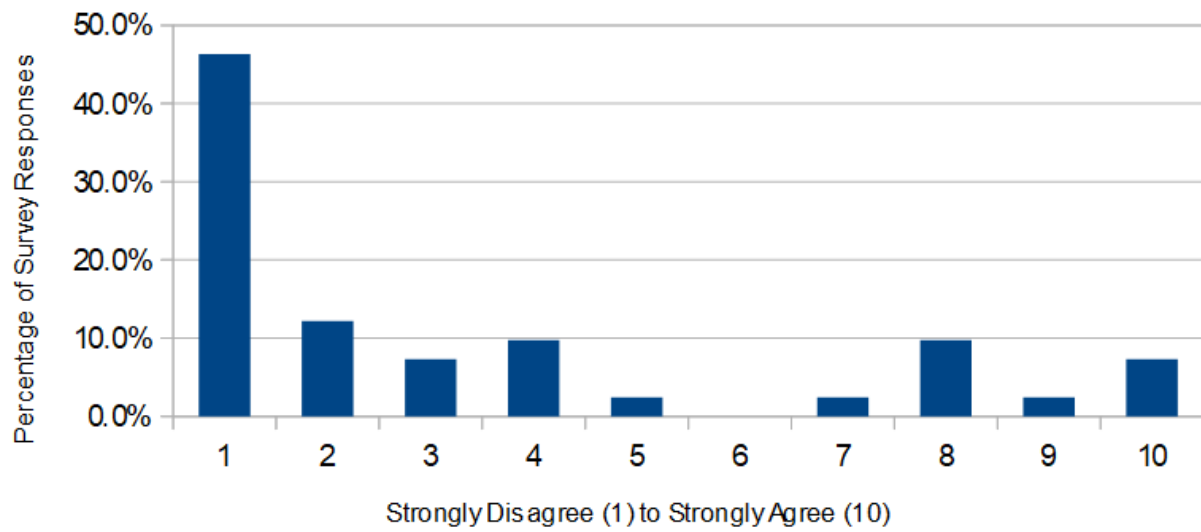
Alternatively, you can write to us at: Sunnica Consultants, FRSP08T reference RT98- LRUJ-AGBY, c/o Newgate Communications, Sky Light City Tower, 60 Basinghall Street, London, EC2V 8DL



sunnica
energy farm

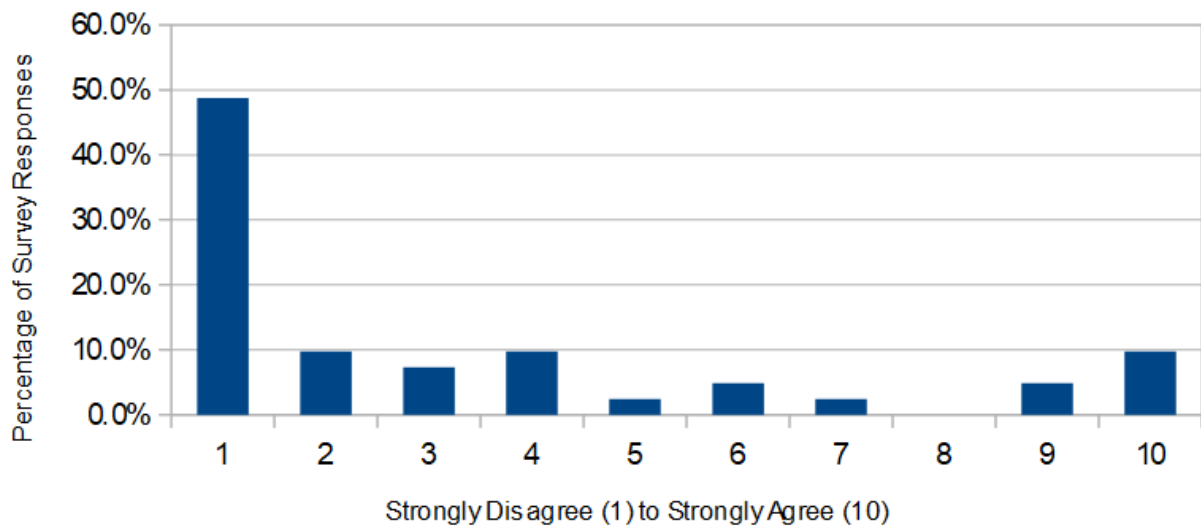
Sunnica Statutory Consultation Survey by Worlington Parish Council

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



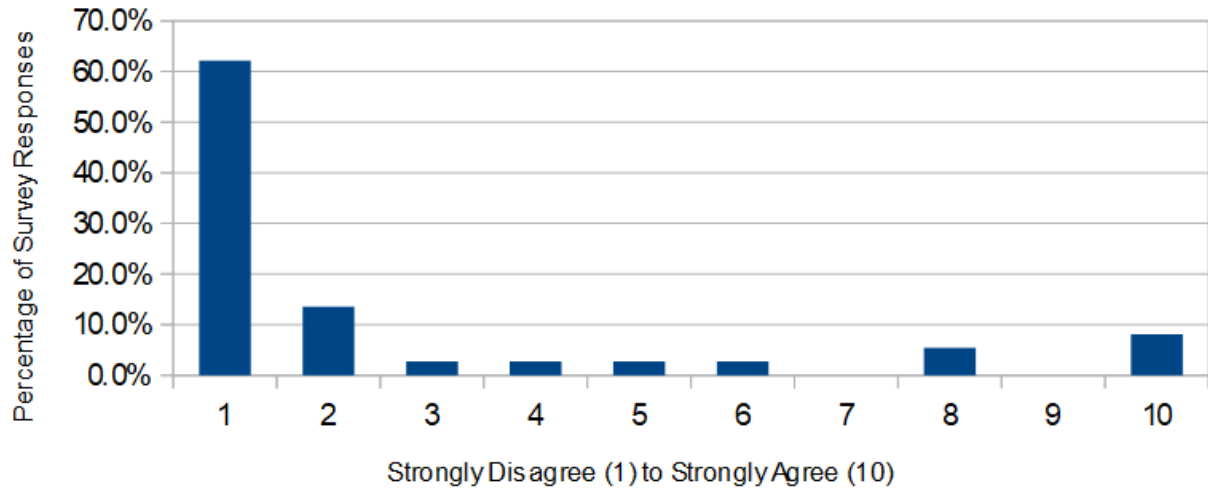
Sunnica Statutory Consultation Survey by Worlington Parish Council

Q2: The information supplied was easy to understand



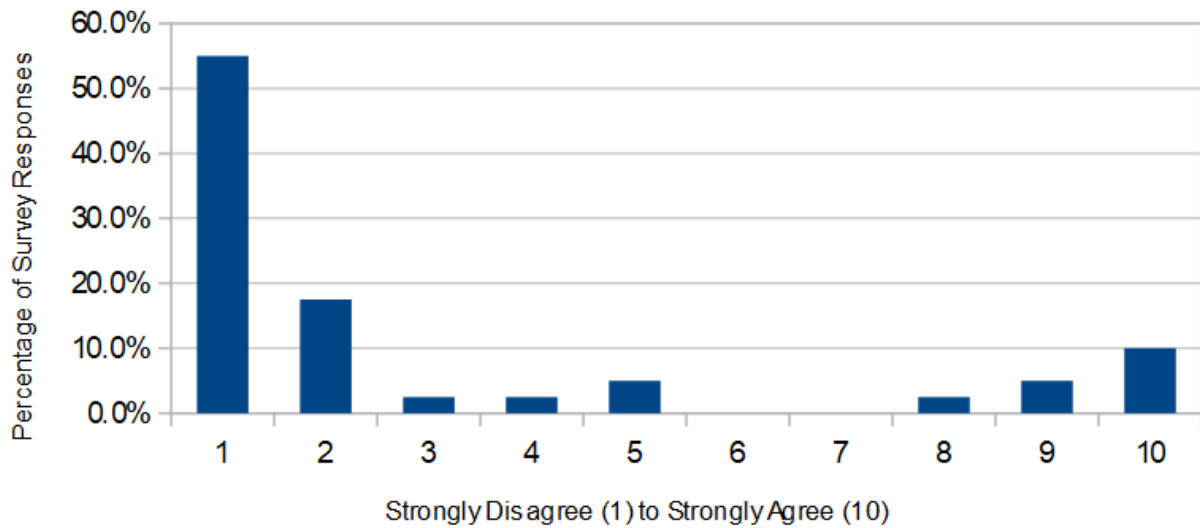
Sunnica Statutory Consultation Survey by Worlington Parish Council

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



Sunnica Statutory Consultation Survey by Worlington Parish Council

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



Response Scale	Q1 Responses	Q2 Responses	Q3 Responses	Q4 Responses	Q1 %	Q2 %	Q3 %	Q4 %
1	19	20	23	22	46.3%	48.8%	62.2%	55.0%
2	5	4	5	7	12.2%	9.8%	13.5%	17.5%
3	3	3	1	1	7.3%	7.3%	2.7%	2.5%
4	4	4	1	1	9.8%	9.8%	2.7%	2.5%
5	1	1	1	2	2.4%	2.4%	2.7%	5.0%
6	0	2	1	0	0.0%	4.9%	2.7%	0.0%
7	1	1	0	0	2.4%	2.4%	0.0%	0.0%
8	4	0	2	1	9.8%	0.0%	5.4%	2.5%
9	1	2	0	2	2.4%	4.9%	0.0%	5.0%
10	3	4	3	4	7.3%	9.8%	8.1%	10.0%

CHIPPENHAM PARISH COUNCIL

44 B HIGH STREET
CHIPPENHAM
ELY
CAMBS
CB7 5PR

PARISH CLERK: MRS SALLY HUGHES
CHIPPENHAMPARISHCOUNCIL@HOTMAIL.COM

21st July 2021

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

Dear Andrew

Sunnica Statutory Consultation

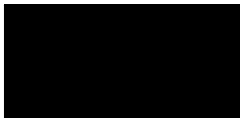
Chippenham Parish Council would like to inform you that they still find that Sunnica's Statutory Consultation was inadequate and request that this letter and accompanying documents are shared with the Planning Inspectorate as part of the Council's "Adequacy of Consultation" representation during the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

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

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

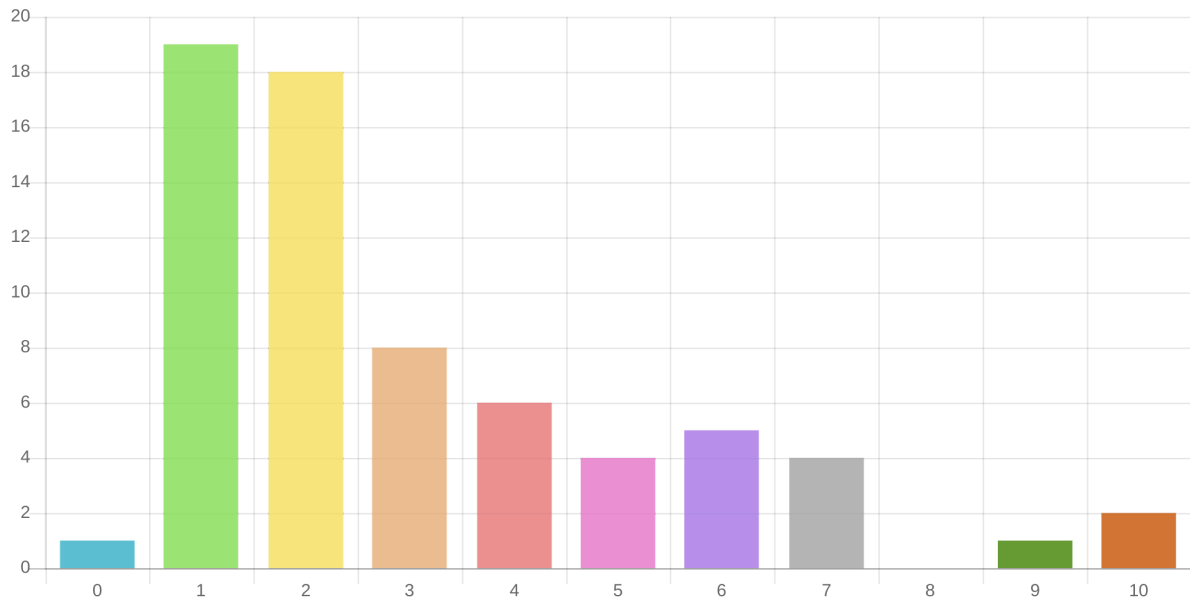
Finally, Chippenham Parish Council carried out a household survey within Chippenham on the Sunnica Statutory Consultation, using four standard questions supplied by the Parish Councils Alliance, Sunnica Group. The survey results and comments raised are attached.

Yours faithfully



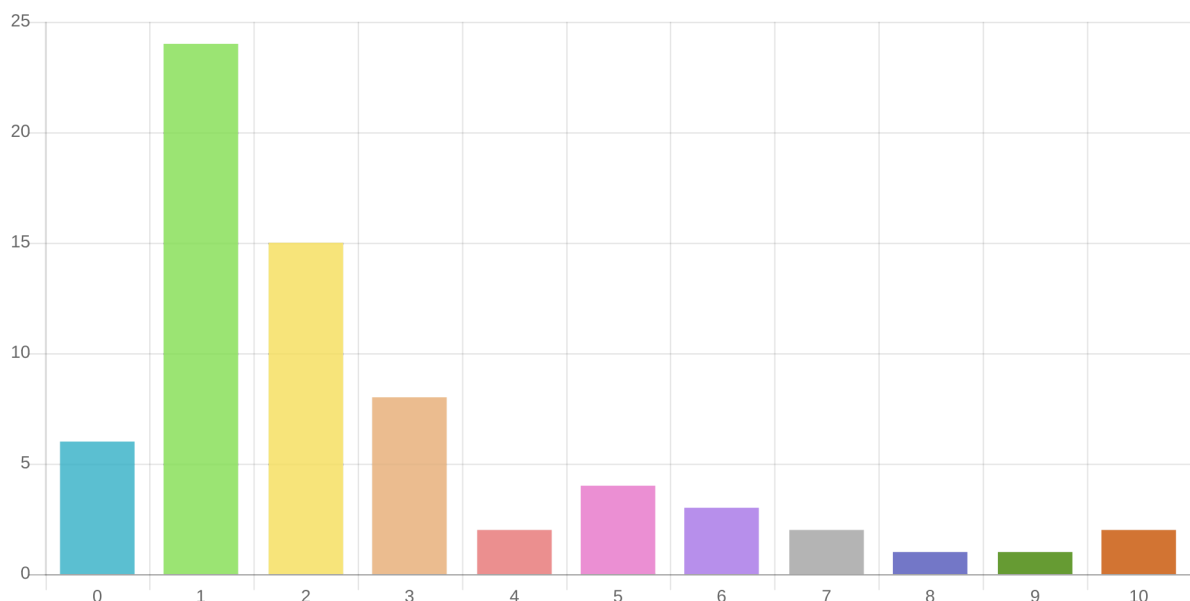
Sally Hughes
Clerk
Chippenham Parish Council

2 The information supplied was easy to understand



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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

This is a welcomed proposal.

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

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

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

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

Inadequacy of Consultation – bullets

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

Lack of Access to Information:

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

- Lack of any physical consultation events excluded many villagers who would otherwise have engaged with the consultation. The pandemic was used as an excuse not to hold any physical meetings whatsoever. However, many of the villages held community events such as Farmer's Markets and Neighbourhood Plan consultations while complying with Government's COVID-19 safety guidelines during the first 7 weeks or so of the consultation period. It was possible for Sunnica to design a safe event for each village, particularly at the beginning of the consultation period. They were asked several times to do this during their webinars but they chose not to.

- Villagers reported difficulties with the consultation booklet maps at a small scale. They were unclear and difficult to read. Small font size was used in the brochure, making it difficult for visually impaired residents to interpret or measure e.g. distances from their homes to the edge of the scheme boundary etc. Maps such as Sunnica East Site A and B Parameter Plan on page 9 show no village names, road names or other landmarks, meaning they must be read in conjunction with other maps which is difficult to manage given the reader may also be using magnifying lenses. Large format maps are required for villagers to comprehend the boundaries and features of the scheme and need to be supplied by the applicant. Sunnica could easily have placed some large scale maps and other information displays in village halls for people to go and look at – even if these information displays were not manned by Sunnica.

- Consultation booklets were delivered in plain white envelopes addressed to “The Resident” without any mention of Sunnica on the outside (including the return address). Some people mistook these for unwanted marketing materials and discarded them. This point had been raised during the Non-statutory Consultation (which was publicised in similar plain envelopes) but the problem was repeated during the statutory consultation.

Webinars

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

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

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

Inadequate Time to Review Information

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

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

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

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

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

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

Misleading Statements and Claims/ Poor Advertising

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

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

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

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

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

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

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

Statement of Community Consultation (SoCC)

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

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

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

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

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

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

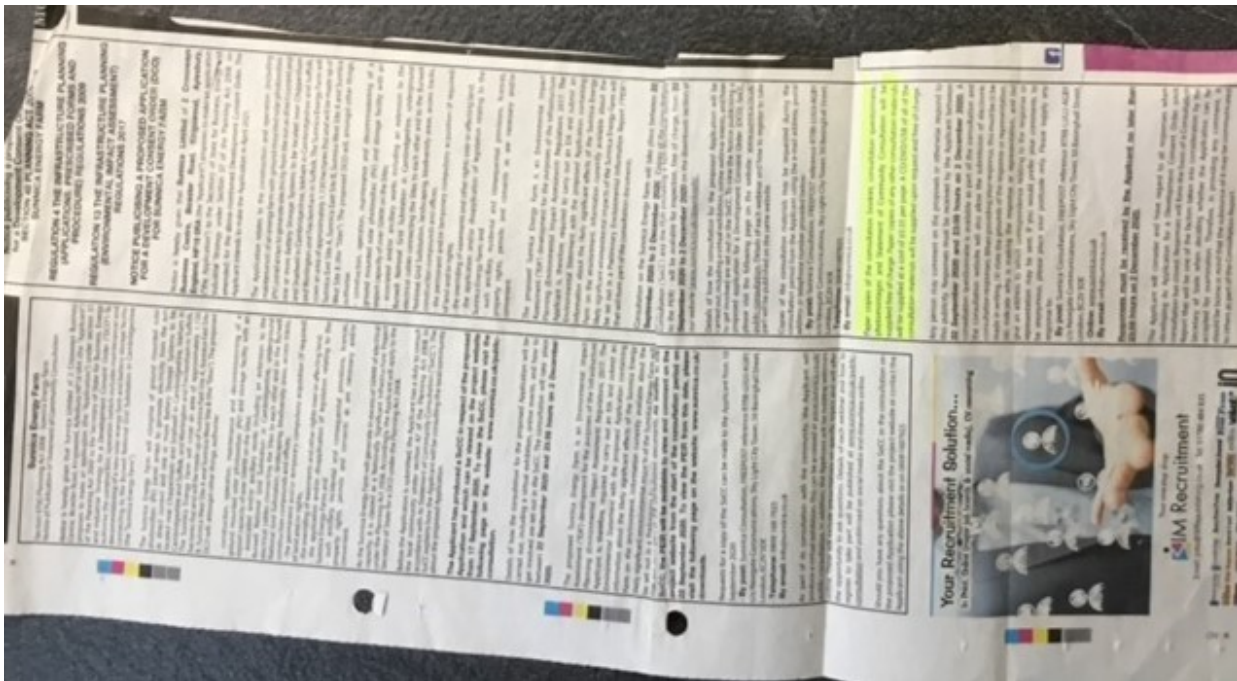
Complaints

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

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

- [Say No To Sunnica - YouTube](#) – WSC Councillor describes the consultation as ‘farical’ (listen to 3.01 mins)
- Despite claims in the SoCC, ECDC councillors said that three Cambridgeshire Parish Councils that are directly affected by the scheme have had NO direct contact from Sunnica. (Ely Standard Newspaper article Sept 2020: ECDC councillors [‘Man up’ and start talking energy firm told](#)).
- Suffolk councillors requested further information so that people can make an informed assessment of the scheme. Comments such as, “At this stage of the process we have many questions to which the answers are not entirely clear, so it’s appropriate at this stage to take these issues to the developer.” And, “The sheer scale of the project means its impact will be significant and very far-reaching (<https://www.eadt.co.uk/news/suffolk-councils-sunnica-solar-farm-response-6547654>)
- Freckenham Parish Council – sent letter to Sunnica on 9th Oct outlining many concerns about the inadequacy of the consultation. Sunnica declined to offer additional support for most of the concerns raised ([9.10.20-Sunnica-stat-consultation-complaint.docx.pdf \(suffolk.cloud\)](#))

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



Example of ‘Panel Ad.’ Bury Free Press

Public consultation

22 September 2020 – 2 December 2020

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

Find out more

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

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

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

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

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

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

5. Contacting us directly using the details below.

Contact us

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

Alternatively, you can write to us at: Sunnica Consultation, FREEPOST reference RTR8-LUUJ-AGRY, c/o Newgate Communications, Sky Light City Tower, 80 Basinghall Street, London, EC2V 6DE





Snailwell Parish Council

Laura Yates (Clerk to the Parish Council)

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

EMAIL: snailwellparishcouncil@hotmail.com

CONTACT PHONE: [REDACTED]

DATED: 27th day of JULY 2021

- East Cambridgeshire District Council
Planning Officer

Andrew.phillips@eastcambs.gov.uk

- Cambridgeshire County Council
Strategic Planning Team

Daniel.snowdon@cambridgeshire.gov.uk

- Mayor for Cambridgeshire & Peterborough

Nik.johnson@cambridgeshirepeterborough-ca.gov.uk

Dear Council Planning Officers

Sunnica Statutory Consultation

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

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

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

Yours faithfully

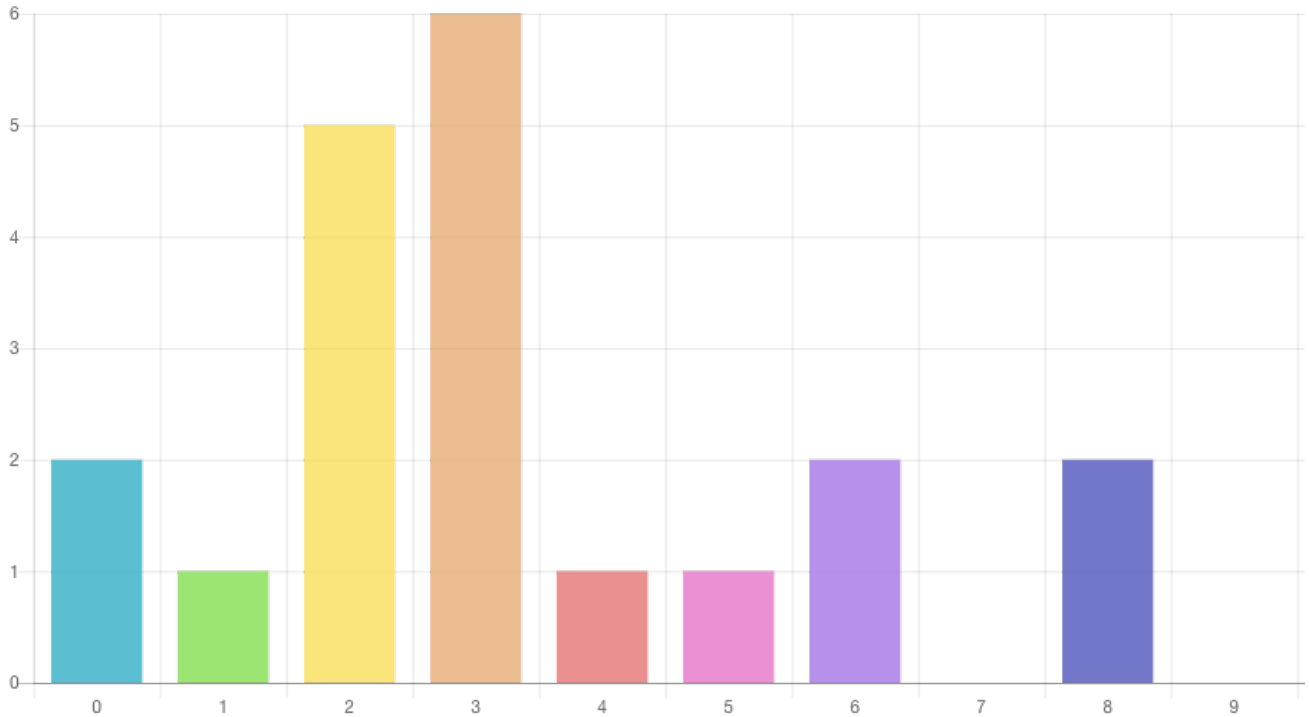
Laura Yates

(Laura Yates)
Clerk to Snailwell Parish Council

Snailwell Parish Council - Sunnica Statutory Consultation Survey

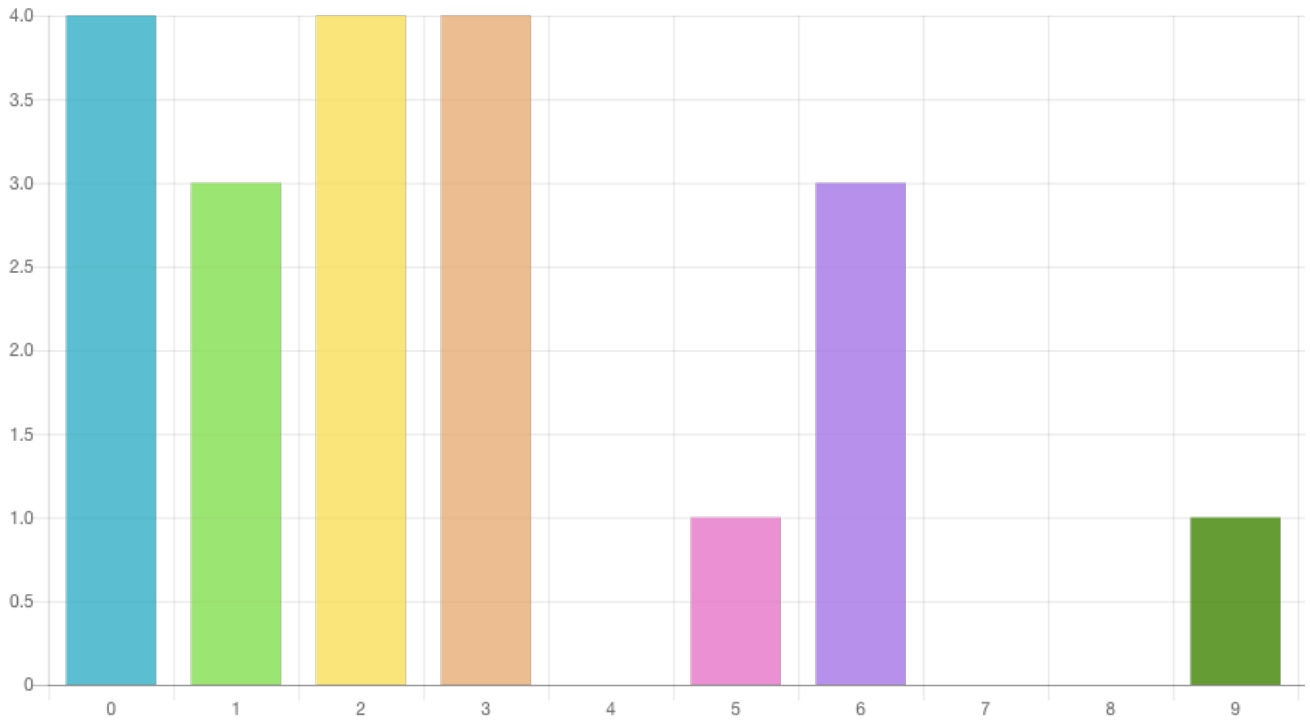
Snailwell Parish Council would like to obtain residents' views on the statutory consultation process held by Sunnica between September and December 2020 for the proposed energy farm covering 2800 acres in the local area. Thinking about the consultation held by Sunnica; please score the following statements:

1 I had no problems using the booklet and online information provided



	0	1	2	3	4	5	6	7	8	9	10	Standard Deviation	Responses	Weighted Average
Strongly Disagree - Strongly Agree	2 (10%)	1 (5%)	5 (24%)	6 (29%)	1 (5%)	1 (5%)	2 (10%)	0 (0%)	2 (10%)	0 (0%)	1 (5%)	1.83	21	3.62 / 10
													3.62 / 10	

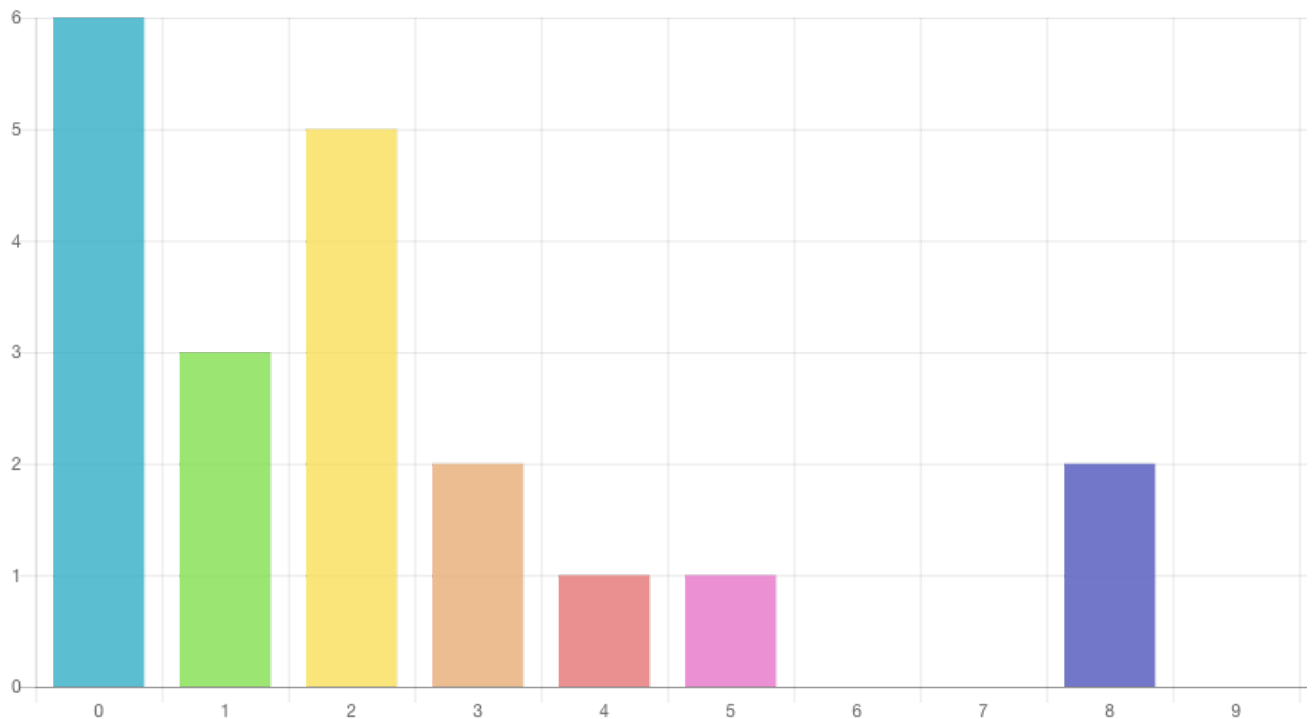
2 The information supplied was easy to understand



	0	1	2	3	4	5	6	7	8	9	10	Standard Deviation	Responses	Weighted Average
Strongly Disagree - Strongly Agree	4 (19%)	3 (14%)	4 (19%)	4 (19%)	0 (0%)	1 (5%)	3 (14%)	0 (0%)	0 (0%)	1 (5%)	1 (5%)	1.62	21	3.1 / 10

3.1 / 10

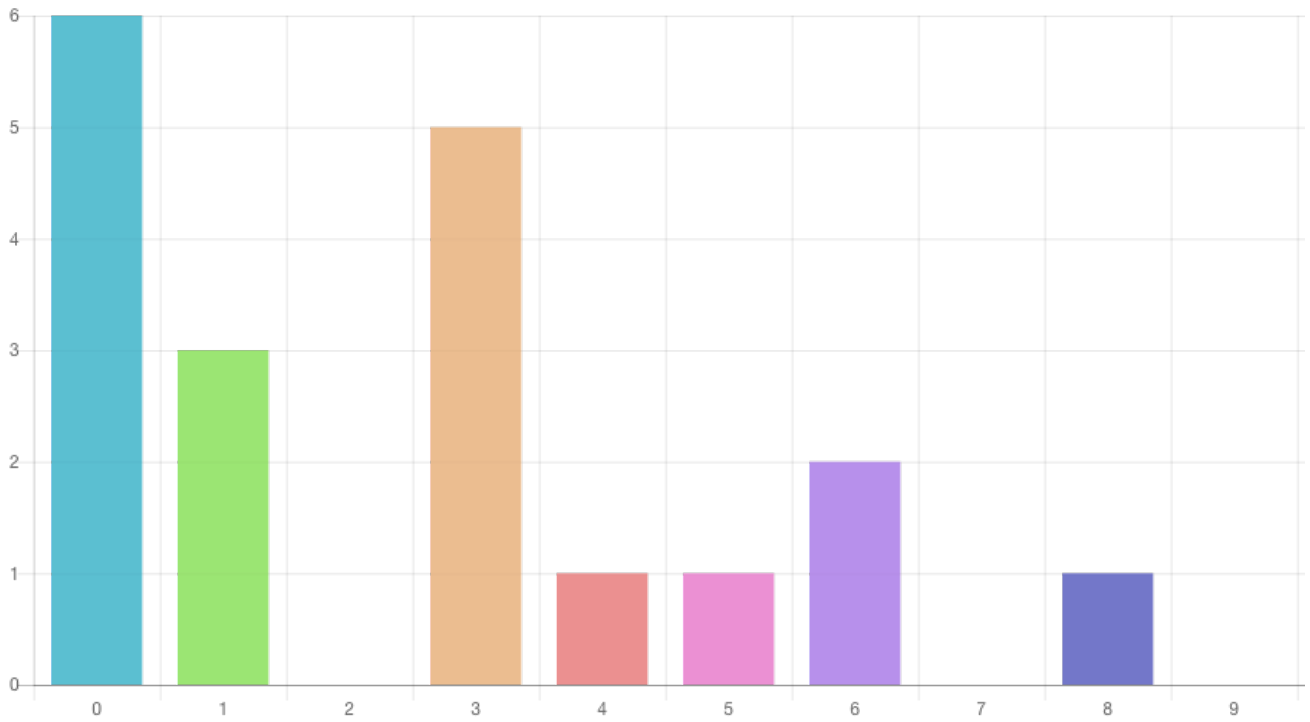
3 The online exhibition, webinars and contact arrangements meant questions could be raised and answered



	0	1	2	3	4	5	6	7	8	9	10	Standard Deviation	Responses	Weighted Average
Strongly Disagree - Strongly Agree	6 (29%)	3 (14%)	5 (24%)	2 (10%)	1 (5%)	1 (5%)	0 (0%)	0 (0%)	2 (10%)	0 (0%)	1 (5%)	1.93	21	2.57 / 10

2.57 / 10

4 The consultation has helped me to respond to Sunnica's proposal



	0	1	2	3	4	5	6	7	8	9	10	Standard Deviation	Responses	Weighted Average
Strongly Disagree - Strongly Agree	6 (29%)	3 (14%)	0 (0%)	5 (24%)	1 (5%)	1 (5%)	2 (10%)	0 (0%)	1 (5%)	0 (0%)	2 (10%)	1.93	21	3.19 / 10

3.19 / 10

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

The process was heavily weighted in Sunnica's favour, with stage managed and curated questions designed to obtain the answers Sunnica required. Without any live interaction or submission to 'real time' engagement this cannot be a meaningful or democratic undertaking. The printed materials were complex and impenetrable in the main.

Does the site have to be so Large? Surely a smaller site would be less obstructive on the countryside

Simply not enough information provided and I have not received any answers from Sunnica to my questions

The consultation process is/was a joke. Sunnica is attempting to run roughshod over the communities affected and appears to be somewhat supported by our local MP's!

The webinars were rehearsed and the questions were uncredited. There was no impromptu opportunity for a response from the public. The questions were not answered fully and accurately. The brochure is also not fly informative.

Felt the style of consultation by Sunnica with Snailwell was very poor and disappointing

Excellent consultation. Very comprehensive.

I continue to say NO to SUNNICA. Your proposal is not in the best interests of anyone in England. If you succeed, no one in the country is safe from you or any other manipulative organisation. It's a disgrace.

Very misleading and most questions not answered fully. Typical cover up session to give part information and gloss over the truth.

The so called consultation did not allow interested parties to engage effectively with Sunnica; it did not provide helpful information; it did not address issues of local concern; it was skewed in favour of Sunnica; it failed to address issues raised by interested parties. It was wholly inadequate and designed to help Sunnica, not provide a basis for balanced consultation.

Only one letter to each house rather than one per voting adult. The inability to get complete answers and challenge was not able to happen. So many area were so vague it is hard fight or reason with a ghost. Needs to be delayed and happen when circumstances allow. So many unanswered questions.

Sunnica have not actually consulted with the residents of Snailwell or the affected area. Sunnica's brochure posted out was incomplete and had several omissions and inaccuracies. When asked for further information or clarity, Sunnica have prevented knowledge and subject matter of questions raised by filtering and choosing questions raised on webinars and at the same time preventing contributors to see or hear the 'filtered or excluded questions', that they simply do not answer or exclude and ignore the questions raised. No dialogue which forms part of a consultation can occur other than on Sunnica's terms. Sunnica webinars have excluded anyone who are not online. Sunnica have not had any open debates where a question could be answered other than their first presentations in person in the village church. Their method is to select and filter our questions they do not like and try only to cherry pick subjects they wish to discuss. We could not see the questions they refused to answer when they held their webinars.

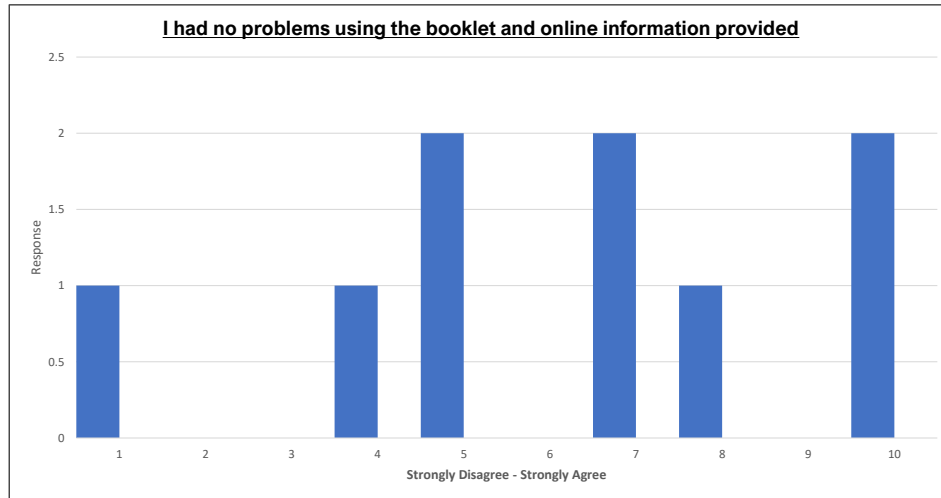
PRESENTATION PROVIDED BY SUNNICA AND FRESPONES TO QUESTIONS WAS GENERALLY POOR, INADEQUATE AND WITHOUT DUE CONSIDERATION OF VIEWS EXPRESSED BY THOSE LIVING IN THE RELEVANT VILLAGES THAT WOULD BE IMPACTED BY SUNNICA'S INTENDED PLANS IN THE AREA OF SNAILWELL AND OTHER NEIGHBOURING VILLAGES

Snailwell Parish Council - Sunnica Statutory Consultation Survey

Snailwell Parish Council would like to obtain residents' views on the statutory consultation process held by Sunnica between September and December 2020 for the proposed energy farm covering 2800 acres in the local area. Thinking about the consultation held by Sunnica; please score the following statements:

Question 1.

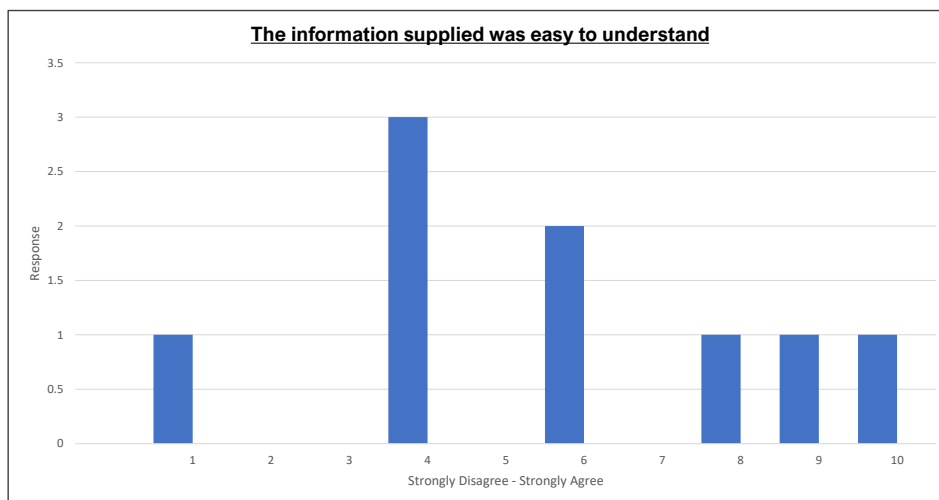
I had no problems using the booklet and online information provided



Strongly Disagree - Strongly Agree	1	2	3	4	5	6	7	8	9	10		Total Responses	Weighted Average
Response Submitted	1	0	0	1	2	0	2	1	0	2		9	6.33 / 10
	11%	0%	0%	11%	22%	0%	22%	11%	0%	22%			

Question 2.

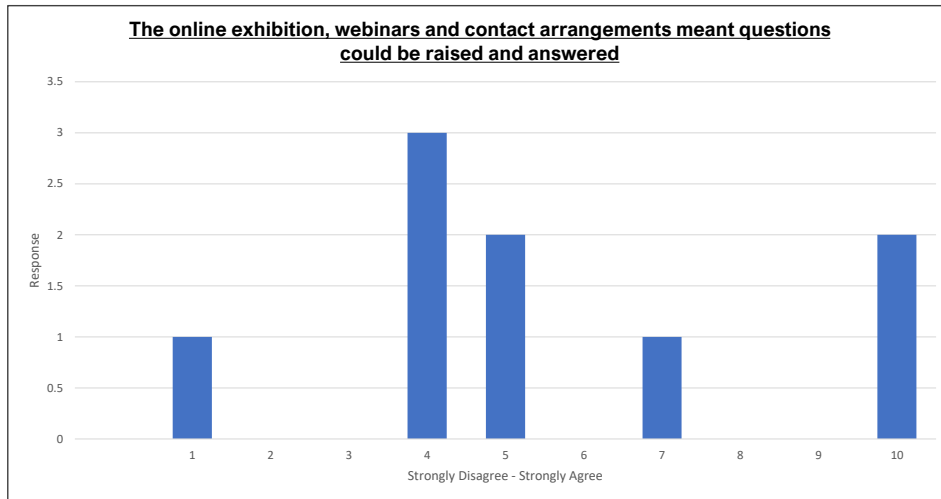
The information supplied was easy to understand



Strongly Disagree - Strongly Agree	1	2	3	4	5	6	7	8	9	10		Total Responses	Weighted Average
Response Submitted	1	0	0	3	0	2	0	1	1	1		9	5.78 / 10
	11%	0%	0%	33%	0%	22%	0%	11%	11%	11%			

Question 3.

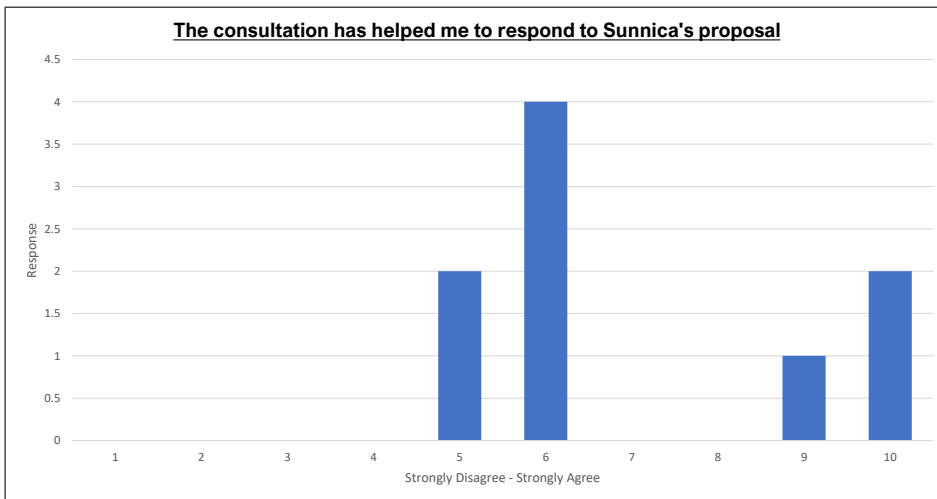
The online exhibition, webinars and contact arrangements meant questions could be raised and answered



Strongly Disagree - Strongly Agree	1	2	3	4	5	6	7	8	9	10		Total Responses	Weighted Average
Response Submitted	1	0	0	3	2	0	1	0	0	2		9	5.56 / 10
	11%	0%	0%	33%	22%	0%	11%	0%	0%	22%			

Question 4.

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



Strongly Disagree - Strongly Agree	1	2	3	4	5	6	7	8	9	10		Total Responses	Weighted Average
Response Submitted	0	0	0	0	2	4	0	0	1	2		9	7.00 / 10
	0%	0%	0%	0%	22%	44%	0%	0%	11%	22%			

Question 5.

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

- Larger and clearer maps please. They are so small to make them out. Not everybody has a computer access.
- Sunnica employs experts in the process of presenting / preparation of such applications as the current solar farm proposal. The overall impression I had was that their conduct of the consultation process was a 'tick in the box' approach. They know what is sufficient to satisfy the planning inspectorate – we don't
- I do not think the opportunity to raise concerns and receive adequate answers was available to us.
- The consultation and displays were an expensive exercise in public relations. It failed to give the following details.
 1. The destruction of the landscape and the area due to the extensive number of solar panels, the battery storage units etc.
 2. The total loss of high-quality farmland which cannot be replaced and is badly needed following Brexit.
 3. With the loss of government subsidies for solar panel farms they didn't inform us of the reason to go ahead with the scheme. i.e., the income they will earn from the battery storage units where they will purchase electricity from the grid. When the grid has too much and resells the electricity at a higher price when the grid needs it.
 4. The huge size of the scheme which will take a number of years to complete will mean the whole area will be a building site for three to four years and reluctant noise, pollution, mud, etc. and will be repeated in 30-40 years when they removed the panels.
 5. The threats they give to the owners of the land who have agreed to have panels installed and have been threatened with compulsory purchase orders if they don't go ahead.
- Lots of information was not given.
- Made me angry and determined to reject to the proposals.

Inadequacy of Consultation – bullets

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

Lack of Access to Information:

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

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

Webinars

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

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

Inadequate Time to Review Information

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

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

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

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

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

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

Misleading Statements and Claims/ Poor Advertising

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

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

- Consultation notifications in local newspapers were written in the small print at the back of the newspapers – these are not widely read (see photograph example below from the Newmarket Journal). Again, no mention of the scale / location was given in the adverts. Whilst this might meet their 'bare minimum' statutory obligations, Sunnica has an **award winning communications company** working on their scheme, so it is very disappointing that they could not have found a more effective means of advertising the consultation...through local village publications, community Facebook groups etc. These are much more widely read by the local residents, particularly during a pandemic. The village publications (e.g. Informer in Isleham, Turnpike in Red Lodge, etc) are hand delivered to every household in the directly affected villages and would have been a far more effective way of engaging with residents about the consultation.
- Sunnica did run a small number of 'panel adverts' in a few local papers, but these again used very small white text on a dark background, making them difficult to read. And the same description for the scheme was used as discussed earlier in this document (i.e. no mention of the scheme being in Suffolk, no mention of it being a NSIP, no mention of the size, location, etc. etc.). Many residents (especially in Suffolk) would therefore not pay any regard to these. Surely the point of advertising is to draw the attention of *all* affected people to what the proposal actually is and to attract their engagement. Their newspaper adverts did no such thing. Sunnica also claimed during one of their webinars that they ran a paid Facebook campaign resulting in several thousand page impressions – but we are not aware of any of the village FB community pages getting any 'hits,' so it's unclear who the recipients actually were.
- No physical advertising in the form of posters and banners was available in the villages until Freckenham Parish council requested these 5 weeks into the consultation. Even then, only 1 small banner was sent per village. More banners/ posters/ placards etc were needed to draw attention to the consultation – one solitary banner per village has practically no impact. And by the time the banners arrived and were put in place we were in a second national lockdown, meaning that residents were not moving around the villages, so didn't see them. The banners also had incorrect dates on them, which were never changed. The use of banners agrees with the adopted West Suffolk Council Statement of Community Involvement on "Line of sight publicity" as recommended by Advice Note 2 from the Planning Inspectorate, Section 5.3 "A local authority's adopted Statement of Community Involvement (or Community Involvement Scheme in Wales) is likely to have a bearing on its response to the developer's SoCC Consultation."
(https://www.westsuffolk.gov.uk/planning/Planning_Policies/upload/18-12-20-SCI-adoptedversion.pdf)
(https://infrastructure.planninginspectorate.gov.uk/wpcontent/uploads/2015/03/Advice_note_2.pdf).

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

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

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

Statement of Community Consultation (SoCC)

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

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

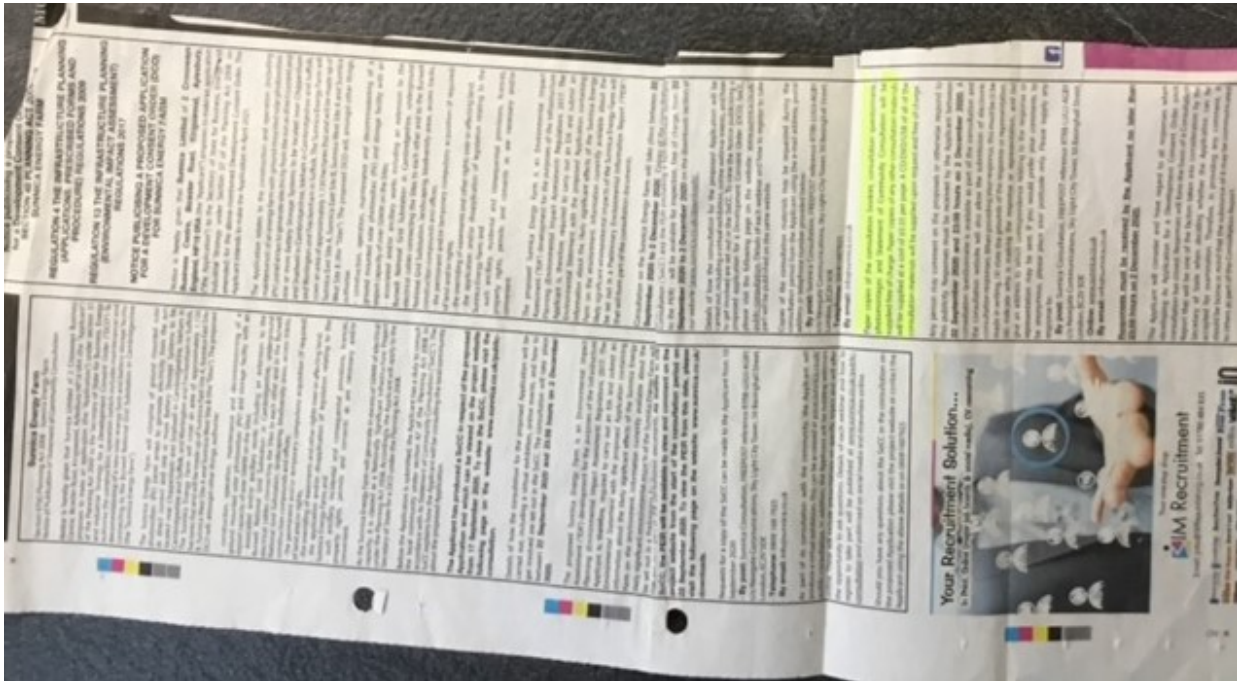
- In the SoCC it also specifically states that the public will be asked for views on the PEIR. As mentioned previously, this was not made available to all residents, so how can they be consulted? Sunnica said the PEIR was too big to put onto DVD, so anyone without a computer/ internet access cannot see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

Complaints

- ECDC councillors have already complained about the "woefully inadequate and laughable" consultation ([East Cambridgeshire District Council - YouTube](#) relevant meeting, Sunnica starts about 2 hours in [East Cambridgeshire District Council, Planning Committee 2nd September 2020 - YouTube](#)
- [Say No To Sunnica - YouTube](#) – WSC Councillor describes the consultation as 'farcical' (listen to 3.01 mins)
- Despite claims in the SoCC, ECDC councillors said that 3 Cambridgeshire Parish Councils that are directly affected by the scheme have had NO direct contact from Sunnica. (Ely Standard Newspaper article Sept 2020: ECDC councillors ['Man up' and start talking energy firm told](#)).
- Suffolk councillors requested further information so that people can make an informed assessment of the scheme. Comments such as, "At this stage of the process we have many questions to which the answers are not entirely clear, so it's appropriate at this stage to take these issues to the developer." And, "The sheer scale of the project means its impact will be significant and very far-reaching (<https://www.eadt.co.uk/news/suffolk-councils-sunnica-solar-farm-response-6547654>
- Freckenham Parish Council – sent letter to Sunnica on 9th Oct outlining many concerns about the inadequacy of the consultation. Sunnica declined to offer additional support for

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

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



Example of 'Panel Ad.' Bury Free Press

Public consultation
22 September 2020 – 2 December 2020

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

Find out more

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

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

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

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

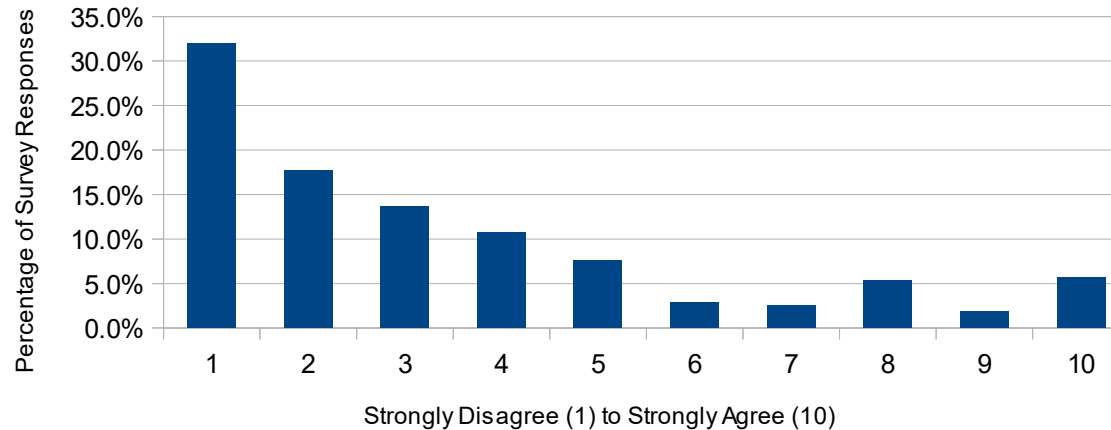


Question 1

Scale		Freckenham	Worlington	Chippenham	Isleham	Snailwell	Total	Percentage
Strongly Disagree	1	16	19	14	48	4	101	32.0%
	2	4	5	20	22	5	56	17.7%
	3	4	3	8	22	6	43	13.6%
	4	4	4	8	16	2	34	10.8%
	5	3	1	6	11	3	24	7.6%
	6	1	0	3	3	2	9	2.8%
	7	0	1	3	2	2	8	2.5%
	8	3	4	4	3	3	17	5.4%
9	1	1	1	3	0	6	1.9%	
Strongly Agree	10	2	3	2	8	3	18	5.7%

Sunnica Pre-application Statutory Consultation Survey
by the Parish Councils Alliance - Sunnica Group

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

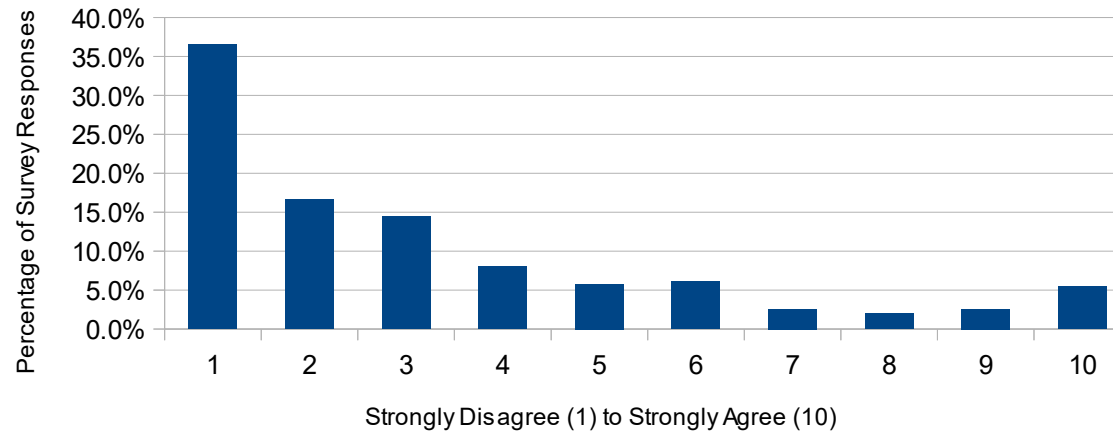


Question 2

Scale		Freckenham	Worlington	Chippenham	Isleham	Snailwell	Total	Percentage
Strongly Disagree	1	15	20	20	51	8	114	36.5%
	2	5	4	18	21	4	52	16.7%
	3	6	3	8	24	4	45	14.4%
	4	1	4	6	11	3	25	8.0%
	5	3	1	4	9	1	18	5.8%
	6	3	2	5	4	5	19	6.1%
	7	1	1	4	2	0	8	2.6%
	8	2	0	0	3	1	6	1.9%
Strongly Agree	9	1	2	1	2	2	8	2.6%
	10	1	4	2	8	2	17	5.4%

Sunnica Pre-application Statutory Consultation Survey
by the Parish Councils Alliance - Sunnica Group

Q2: The information supplied was easy to understand

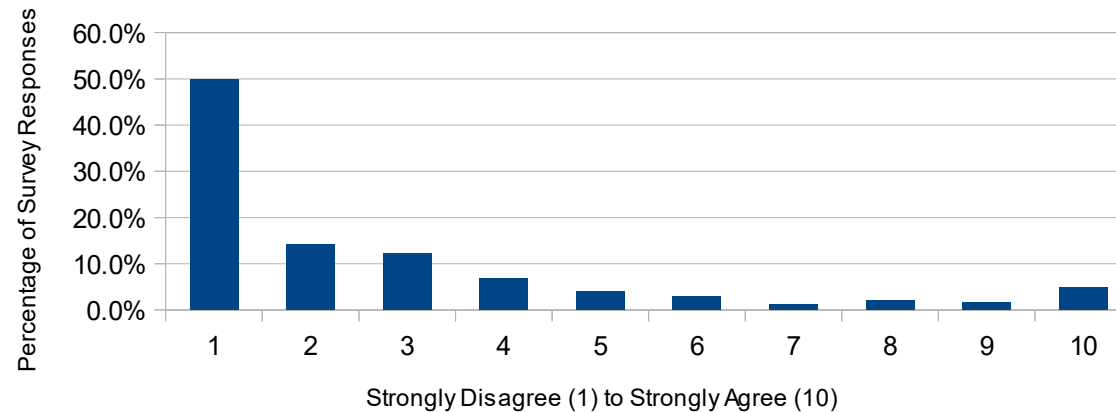


Question 3

Scale	Freckenham	Worlington	Chippenham	Isleham	Snailwell	Total	Percentage
Strongly Disagree 1	18	23	30	71	10	152	50.0%
2	3	5	15	15	5	43	14.1%
3	5	1	8	21	2	37	12.2%
4	4	1	2	10	4	21	6.9%
5	2	1	4	2	3	12	3.9%
6	1	1	3	4	0	9	3.0%
7	1	0	2	0	1	4	1.3%
8	0	2	1	1	2	6	2.0%
9	1	0	1	3	0	5	1.6%
Strongly Agree 10	0	3	2	7	3	15	4.9%

Sunnica Pre-application Statutory Consultation Survey
by the Parish Councils Alliance - Sunnica Group

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

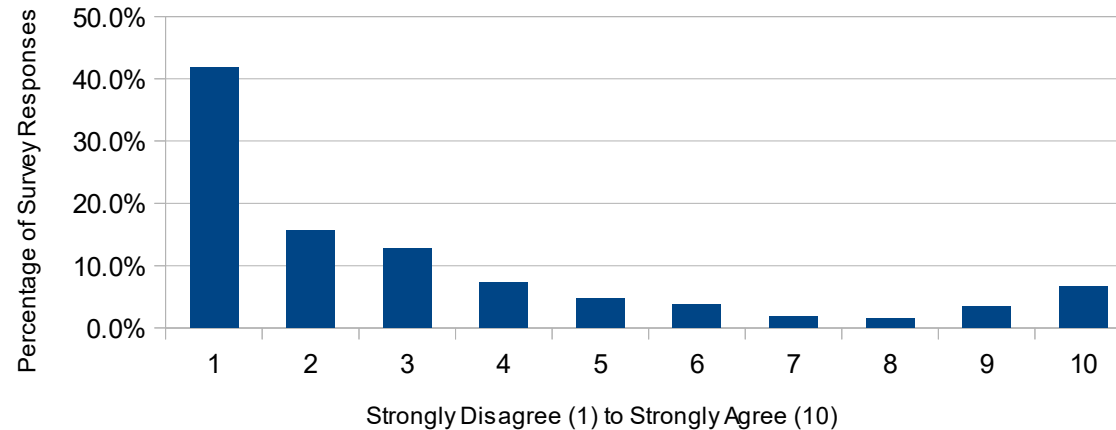


Question 4

Scale	Freckenham	Worlington	Chippenham	Isleham	Snailwell	Total	Percentage
Strongly Disagree 1	15	22	26	59	9	131	41.9%
2	4	7	19	19	0	49	15.7%
3	5	1	9	20	5	40	12.8%
4	3	1	3	15	1	23	7.3%
5	4	2	1	5	3	15	4.8%
6	1	0	4	1	6	12	3.8%
7	2	0	2	2	0	6	1.9%
8	1	1	2	0	1	5	1.6%
9	1	2	1	6	1	11	3.5%
Strongly Agree 10	2	4	2	9	4	21	6.7%

Sunnica Pre-application Statutory Consultation Survey
by the Parish Councils Alliance - Sunnica Group

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



ISLEHAM PARISH COUNCIL

Clerk: Richard Liddington

The Beeches

32 Mill Street

Isleham

CB7 5RY

Tel: [REDACTED]

E mail: islehampc@gmail.com

Mr A Philips

Senior Planning Officer

ECDC

The Grange Nutholt Lane

Ely

CB7 4EE



28th September 2021

Dear Andrew

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely



R. Liddington
Parish Clerk

cc. Sunnica
Lucy Frazer MP
Julie Barrow West Suffolk District Council



**CAMBRIDGESHIRE
& PETERBOROUGH**
COMBINED AUTHORITY

Date: 26 October 2021
Telephone: 01353 667721
E Mail: Nik.Johnson@cambridgeshirepeterborough-ca.gov.uk

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

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

Dear Minister,

SUNNICA ENERGY FARM PROPOSAL

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

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

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

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

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

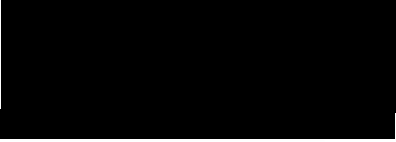
There are suggestions from my residents that the statutory consultation was inadequate, particularly due to some late boundary changes around Isleham after a landowner withdrew support for the scheme resulting in late changes by Sunnica, upon which residents may not have

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

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

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

Yours Sincerely,



Dr Nik Johnson
Mayor of Cambridgeshire and Peterborough



COMPLAINT REPORT

DATE Monday 2nd November 2020.

SUBJECT Sunnica Ltd Consultation 22nd September to 2nd December 2020.

WRITTEN BY Alan B Smith 5 Elevenways Freckenham Road Worlington IP28 8UQ
[REDACTED]

BACKGROUND Banking Corporate Finance. (retired)

RECIPIENTS Suffolk County Council, West Suffolk District Council, Cambridgeshire County Council, East Cambridgeshire District Council, Matt Hancock MP, Lucy Frazer QC MP, Planning Inspectorate and Secretary Of State.

REASONS FOR COMPLAINT Lack of response to my letter to the directors of Sunnica Ltd dated 11th October 2020 where they were given 21 days to answer specific questions put to them. (Copy letter attached to email.)

The fact we are now past the half way mark in the consultation period leaves me with no alternative but to lodge this complaint.

REFERENCES

EA Planning inspectorate Examining Authority.

SOS Secretary Of State.

NSIP Nationally Significant Infrastructure Project.

BESS Battery Energy Storage System.

CLEEVE HILL refers to the NSIP for a 900 acre solar farm at Cleeve Hill Faversham Kent given planning permission by The Secretary of State 28th May 2020.

SUNNICA CONSULTATION.

So far it has been run in an unsatisfactory manner whereby emphasis has been concentrated on the brochure and webinars. This method of consultation has been required due to the Covid 19 pandemic. However this is no excuse for Sunnica to not share their plans with the public and be completely transparent. The directors of Sunnica Ltd have a legal responsibility to consult and having read their SoCC I do not consider they are fulfilling their responsibility.

The webinars are discriminatory against the older population who have less IT skills than the younger generation. In the case of the 4 parishes covered by the proposed solar unit there is a high proportion of retired senior citizens.

Communication with the directors of Sunnica has been made very difficult which suits their agenda but not that of the people affected by their scheme proposal and certainly not myself.

Therefore a project designated as important as a NSIP deserves top professional and honest presentation and not a half baked misleading brochure sadly lacking in fact and financials.

I find their brochure “Not fit for purpose”.

I will now refer to the brochure and explain my reasons for quoting the above.

Brochure.

All maps included are unreadable and not to scale and even A3 size is still insufficient to correctly identify boundaries etc. The only acceptable map size is an Ordnance Survey map scale 1:25 000. and these should have been available in all 4 village halls.

Road Numbers cannot be identified on the maps and numbered roads are not named.

The word “farm” in any literature should be removed as it is anything but a farm. What we see here is an industrial complex consisting of BESS, warehousing, office accommodation and numerous sub stations. When I bought my home in Worlington in 2015 the local authority confirmed to my solicitor that all the land at the rear of my property between Freckenham Road and Elms Road was designated as “Countryside” and could never be developed.

I expect this to continue as designated.

Page 8 .

This refers to the splitting of the original very large site of Sunnica East into two smaller sites A and B. This was forced upon Sunnica due to the withdrawal of 800 acres of land at Freckenham by the land owner Mr Tuke. The original acreage of the proposed site was 2,600 acres, it was then reduced by the 800 acres to 1,800 acres, and now includes a total of 2,800 acres, much larger than the original plan. None of these figures are evident for the public to view, neither is the split of the acreage announced in the video presentation and briefing to the Councils 15th July 2020.

The acreage in that report by Freckenham Parish Council reads as follows,

- 1900 acres of developable land
- 850 acres of non-developable land, containing
 - 635 acres of offset/mitigation
 - 215 acres of archaeological mitigation zones
- 50 acres of BESS.

The proposal is to arrange the panels facing South, in lines across fields running from east to west.

Battery storage site E18 and the proposed construction site entrance on the B1085 (Elms Road) contradict the comments made by West Suffolk Council and Suffolk County Council in their response of the 26th July 2019 to the first public consultation. Page 2 states it will also be concerned to safeguard existing minerals and waste developments and future areas of extraction including those which might offer further potential extensions in the foreseeable future to the existing quarry.

Sunnica do not indicate where the site entrance will be in Elms Road and the public should know this. Furthermore on page 6 of the Councils letter reference is made to the potential effects of the development on an existing traveller's site and this must be fully assessed and minimised, E18 would appear to be very close to their entrance.

Solar PV technology page 12.

Does not state whether the panels, although facing South, will be East to West as per the 15th July briefing.

Cleeve Hill estimate for 900 acres of panels (east to west) was 880,000, if the acreage is doubled for the Sunnica proposal it would be in the region of 1,760,000 panels.

This would change the landscape in an unacceptable way for 40 years. Again the directors have to acknowledge the public has a right to know this type of information.

Battery Storage page 14 and Major Disaster section page 29

There is scant information on this highly controversial subject of battery storage and the high risks involved with fire. It is well known in the industry that fires with BESS in Phoenix caused the State of Arizona to totally close down installations until the causes are established. There are other reported fires in South Korea.

The Cleeve Hill EA report includes 12 pages on this subject. The examiners accepted the developers assurance that they were safe. In September this year a fire occurred at a BESS site in Liverpool only 12 months after installation.

This proves they are unsafe.

Sunnica proposes 3 sites, they do not give the acreage for each site or the number of containers on each site. Worlington is sandwiched between 2 sites E33 and E18.

E18 location is within half a mile of 2 primary schools each with a capacity of 420 children and the Red Lodge development with a population of 6,000 (2018)

Page 29 major disaster, section assessment, states an assessment has been undertaken. Sunnica have to tell the public who did the assessment and provide the report in detail.

There is a risk with the Sunnica proposal of a major catastrophe and this cannot be allowed to happen.

Grid connection page 16.

Electricity generated will be imported and exported. What % will be exported? This is not quoted. If we have to give up 2,800 acres of good agricultural land presently used for food production it becomes counterproductive to may be import more food.

The outer section of Sunnica East at Bay Farm Worlington is 10 miles from the grid connection at Burwell. This will involve 16km of cabling at huge cost. We need to know the estimated cost.

It is noted that recently Smith Bros Contracting Ltd were awarded the contract for providing turnkey electrical engineering services to Sunnica. Even they comment that providing 16km of cabling will prove challenging.

If a contract of this scale has been agreed prior to planning consent it indicates Sunnica may have been given “agreement in principle” for their scheme to proceed by the SOS. This needs clarification.

In industry terms the max efficiency for producing electricity from Solar is 3.1 miles from the grid connection. In the case of Sunnica it is 10 miles, as the crow flies, which raises the question is the huge scale of the project to offset inefficiency.

Alternative sites. This is not covered in the presentation. We need to know why our area has been selected and also why brown field sites have not been identified and have priority over food producing land.

I have asked Sunnica to provide me with alternative sites they have examined in May 2019, November 2019 and most recently the 11th October 2020. To date this important information is being withheld by the directors.

The next section of my report will cover the “**about us**” comments on the inside front cover of the brochure.

It is emphasised the information I will provide has come from public documents filed at Companies House.

It is stated that it is a joint venture between 2 established solar developers, Tribus Energy and PS Renewables. They are scheme partners. In fact they are 2 separate legal entities.

There is no further information provided as part of the public consultation as to whom the directors are and any information to substantiate their involvement with the project or the companies financial capabilities.

Firstly I will report on the directors involved and secondly the Ltd Companies.

Marcus Luke Murray. [REDACTED]

Listed as holding 10 directors appointments including,

5 current, 4 dormant and 1 dissolved

Out of the 5 current appointments the company accounts will show

Sunnica Ltd with a shareholders deficit of £317851 as at 30th April 20, Tribus Clean Energy Ltd with a capital of £138 as at 31st August 2019, Tribus Clean Energy 11 Ltd about to be struck off by Companies House and Lapwing Fen 11 Ltd with a deficit of £260,532 as at 31st Oct 2019.

Out of the 4 dormant companies is included Sunnica Energy Ltd, Sunnica Energy Farm Ltd and Sunnica Farm Ltd.

Matthew Justin Hazell [REDACTED]

Listed as holding 33 directors appointments including

14 current, 9 dormant, 8 dissolved and 2 resigned.

Out of the 14 current, 7 director appointments were for new companies formed in the last 2 years with no financials available.

Of the 9 dormant companies included were Sunnica Energy Ltd, Sunnica Energy Farm Ltd, Sunnica Farm Ltd, and PS Renewables Ltd.

Out of the 14 current appointments company accounts section show

Sunnica Ltd with a shareholders deficit at 30th April 20 of £317851, wse afon llan Ltd deficit of £1348 as at 31st August 2019, Longfield Solar Energy farm Ltd deficit of £199 at 30th Novemeber 2019.

The pattern of director's appointments, especially those of Matthew Hazell, is very unusual and causes concern. At the funding stage of the planning process it will require close scrutiny.

It may highlight smaller solar farms being developed and sold on quickly for profit.

If this is the case there is a danger that the same may happen with Sunnica Ltd with resulting concerns re maintenance over a period of 40 years and decommissioning.

I will now give details of the companies involved and their financials.

Sunnica Ltd

The directors are Matthew Justin Hazell appointed 18th September 2018, Marcus Luke Murray appointed 27th December 2013 and Adrian Mozas (Spanish) appointed 18th September 2018.

The company was incorporated on the 27th December 2013.

The original name of the company was Kestrell Meadow Ltd and it traded under that name from date of incorporation in 2013 to the 24th October 2018 at which time a change of name was registered to Sunnica Ltd.

The director of Kestrel Meadow Ltd from the date of incorporation has been Mr Murray.

Kestrel Meadow Ltd was dormant for the year 2014 but for the year 2015 showed a deficit of £59547. For 2016 a deficit of £109300. For 2017 a deficit of £83597 which was the deficit figure when the name was changed to Sunnica Ltd.

No accounts were published for 2018 due to the changeover but for 2019 under the name of Sunnica Ltd, showed a deficit of £181703 which increased for 2020 to £317851.

In September 2018 at the time of the appointment of Mr Hazell as a director, companies house records show **Jigg Fm Uk Ltd** was recorded as a person with significant control.

Jigg Fm Uk Ltd.

This company was incorporated on the 1st August 2018, the directors being Mr Hazell and Mr Mozas (Spanish). Year end accounts for 2019 show a deficit of £49754 and for 2020 a deficit of £52553.

The accounts for 30th April 2020 mention the ultimate parent Company is Bosques Solares SL, the immediate parent company is Padero Solaer Ltd.

Padero Solaer Ltd

This company was incorporated on the 5th April 2012, the correct designation of this company is Padero Solaer ltd T/A P. S. Renewables.

Therefore P. S Renewables is in fact P=Padero S=Solear Renewables.

The directors are Glenn Lockhart and Adrian Mozas (Spanish) The accounts for 2019 show shareholders' funds of £2,076,882. 2020 accounts not yet filed.

The company is under the control of Bosques Solares SL a company incorporated in Spain

P.S.Renewables is the facing name for Solaer founded in Spain in 2004 and Padero Solar Ltd created in 2011, a small company with shareholders funds of £150749.

PS Renewables Ltd.

Incorporated on the 2nd November 2012 sole director Matthew Justin Hazell appointed 2012.

Has been registered as a dormant company since the date of incorporation 2012 to the last accounts submitted in 2019.

Tribus Clean Energy 11 Ltd

Company limited by guarantee, incorporated 16th January 2019. Confirmation statement overdue with Companies House.

Sole director Marcus Luke Murray appointed 16th January 2019.

7th April 2020 first gazette notice for compulsory write off.

Tribus Clean Energy Ltd

Incorporated 1st August 2018, sole director Marcus Luke Murray appointed 1st August 2018.

Accounts to 31st August 2019 show capital and reserves of £138.

Referring back to “**The About us**” introduction I cannot understand why Tribus has any relevance as there is no value, it is certainly not an established solar developer within two years, Sunnica has no net worth and P S Renewables is a facing name.

There is a direct link via the Spanish director Mr Mozas from Sunnica Ltd to Jigg Fm Uk Ltd to Padero Solaer Ltd to Bosques Solares SL which is the company incorporated in Spain but there is no access to its capital value.

Therefore it becomes very difficult to establish just where the funds are coming from to fund the Sunnica proposal and its vast capital expenditure.

I think it is important to look at the estimated capital cost of the proposed Sunnica development which answer unfortunately is not forthcoming from Mr Hazell and Mr Murray.

The Cleeve Hill EA gives an estimate for Cleeve Hill of £450 million for the 900 acre development. Sunnica is double the size at 1900 acres plus 16km of cabling which was not necessary at Cleeve Hill. So we are looking at a figure of between £1 and £1.5 billion. On top of this is the research and development costs which was £2 million for Cleeve Hill and will be considerably higher for Sunnica.

The Suffolk Councils letter I referred to earlier in this report dated 26th July 2019, page 6 refers to Decommissioning and the need for a bonded fund to be in place. Brochure, Page 32 Decommissioning indicates between 12 and 24 months. An estimated cost is required from Sunnica.

The bonding may be difficult to obtain.

End of report.

Gross, Victoria

From: Netty Flindall [REDACTED]
Sent: 31 January 2021 15:08
To: Barrow, Julie
Subject: Inadequate consultation by Sunnica.

[THIS IS AN EXTERNAL EMAIL]

Conservative membership No [REDACTED]

Dear Councillor Barrow,

I am writing to express the very real concerns of the local community in Isleham and the surrounding villages. The people who feel their voices have not been heard. I'm not sure if you are aware of Sunnica's NSIP project and if so listened to Sunnica's webinar consultation.

The consultation that took place was totally inadequate for many reasons. On paper the statutory consultation looks really comprehensive and informative. However the reality was totally different.

I live in Isleham and as soon as the second Lockdown was announced several residents contacted the Say No to Sunnica Group overwhelmed on how to address their fears and concerns, wanting to protest but feeling inadequate and at a loss on how to respond to Sunnica's Questionnaire. Time and time again when I went to assist them in filling in their Questionnaire they felt disgruntled and cheated out of not having a face to face meeting with The Directors to express their anger, distress and anxieties over the loss of their farming landscape which they own, have worked on, walked during their lifetime. Nearly all of the people I called on were not familiar with Zoom meetings and Webinars and if they were familiar with the terminology they didn't know how to use it. Proving that Sunnica's consultation is totally inadequate.

The webinars that were conducted by Sunnica were totally controlled by them, only Sunnica representatives were allowed to speak and put their views across, the public had to text their concerns and hopefully get answers, no opportunity to question the reply. Nearly fifty percent were not answered adequately.

At every webinar or zoom meeting I have attended, discussing Sunnica with others, there has always been an opportunity to have a two way conversation. Why not so with our meetings with Sunnica, how can that be seen to be an adequate consultation? This NSIP urgently needs to be delayed until ALL parties concerned can have their say and viewpoints put across. It is very evident that Sunnica are using the pandemic to get their project through with little resistance.

Isleham originally was not included on Sunnica's plans and came to the table really late therefore the residents have not had the correct consultation time.

The maps in the Consultation booklet were very misleading and of such a scale it was totally illegible to read and understand.

Sunnica are gaining a reputation for bullying and acting underhandedly, land owners being threatened with compulsory purchase, demands being made to access farmers land, Anglia water board re routing pipeline because of Sunnica, so as not to go through farmland on which the proposed panels will be laid.

The strength of feeling against this project by the residents is overwhelming. During the Pandemic and the 3rd National lockdown mental health is a big issue and Sunnica is totally guilty of causing much anxiety and concern to the residents, especially those whose land is directly affected.

Sunnica are playing on the vulnerable residents during this Pandemic to their advantage, yes, Sunnica has given us more time but that does not address the residents in this category...for the same reasons, their inability to respond are the same this week as they are the next.

Hoping we can rely on your support.

Sent from my iPad

Gross, Victoria

Subject: FW: Sunnica consultation

-----Original Message-----

From: Martin Attree [REDACTED]
Sent: 05 May 2021 09:12
To: Harvey, Brian <Brian.Harvey@westsuffolk.gov.uk>
Subject: Sunnica consultation

[THIS IS AN EXTERNAL EMAIL]

Good morning Brian

I am sending this email to make you aware that I am not happy with the way the Sunnica consultation was conducted through the Webinars.

They did not allow us to completely air our views or ask our questions and then respond to the answers given by Sunnica.

Ideally I would like to have another consultation which can take place in face to face especially since lockdown is now starting to ease.

Kind regards.

Martin Attree

Sent from my iPad

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*****-W-S-

Annexe
Park Farm House
Snailwell Road
Chippenham
Ely CB7 5QB

16 May 2021

Email to: CCC, ECDC, WSC, SCC Planning Departments & Cambridge Mayor.

Dear Sirs,

Inadequacy of Sunnica Consultation

I have been keenly participating in and following the recent Sunnica local consultation, and have a great many concerns, and am very unhappy with the adequacy of what has been done.

This consultation was totally inadequate and must be done again properly. My objections are listed below.

1. Lack of Access to Information:

- Sunnica relied too much on a brochure and questionnaire as a means of 'consulting.' Consulting means 'discussing' - a brochure cannot be seen as a consultation!!
- The Sunnica consultation brochure only gave a brief overview of some aspects of the proposal. Anyone who could not access the online information (many older village residents in this case) could not make a meaningful judgment about the scheme.
- The Sunnica consultation brochure was meant to be read in conjunction with the Preliminary Environmental Information Report (PEIR) but this was not made available in the villages. There should have been at least 1 hard copy per village ready for the start of the statutory consultation on 22nd September 2020. The PEIR contains additional detail about the scheme and was described by Sunnica multiple times as a 'significant document' which needed to be read. Sunnica only allowed online access to this report, thus discriminating against those without computer access. Sunnica said a hard copy PEIR (900 pages) could be made available at a charge of 35p per page (£315)! Consequently, a significant number of residents were unable to review this.
- **There were no face-to-face consultation events at all**, which excluded many villagers who would otherwise have engaged with the consultation. The pandemic was used as an excuse not to hold any physical meetings, but in the first 6 weeks of the consultation period, other events such as farmers markets, neighbourhood meetings, sporting events etc were taking place in a covid-secure way in the villages. There is no reason why Sunnica could not have manned an information stand at these events, and there is no reason why an un-manned information display with large scale maps, the PEIR etc could not have been made available in all affected villages (there are plenty of community buildings in each of these locations).

2. Webinars

- Webinar scheduling was flawed and took up a significant portion of the consultation period. Sunnica split the webinars out into 'topics' but this meant that people had to wait many weeks until the webinar on a given topic was available. The recorded webinars were not uploaded immediately to the website, so a further few weeks were wasted waiting for the webinar with the topic of interest to

be made available to those that missed the live webinar. There is no reason why recorded introductions for each of the topic areas could not have been made available from the beginning of the consultation (22nd Sept), allowing people to listen to these and formulate questions, ready for a Q&A webinar.

- The webinar format itself was a 'closed' format (i.e. a **1-way only 'Broadcast' presentation**). Residents had to register to attend. They had to submit questions in advance or via a chat function. There was no transparency. Some questions were answered, others were ignored. If the questions were misunderstood or incompletely answered, there was no way of going back for clarification. Sunnica should have held the webinars in an open Zoom format, or similar, allowing a 2-way dialogue between the developer and the residents. There is no reason that they could not have done this – it has become the norm for consultations and meetings during the Covid-19 pandemic.

3. Inadequate Time to Review Information

- The statutory consultation started during a further escalation of the Covid-19 pandemic. During the consultation period, a second (4-week) national lockdown was introduced, which was not adequately compensated for by the 16 day extension to the consultation period. The second lockdown further reduced people's already limited access to information, and the scheme boundary was modified during this lockdown (on 9th Nov) making it even more difficult to properly consult as the scheme changed part way through the process.
- Isleham and West Row residents had little time to review the information as the scheme areas that border these villages in the current proposal were only added just before the statutory consultation began. So most people in these villages weren't even aware of what Sunnica was. The lack of detailed information in the Sunnica brochure, and the escalating pandemic and national lockdown, meant that Isleham and West Row residents had even less time to learn about the proposal.
- **Sunnica was slow to reply to written questions**, blaming the pandemic. This prevented residents being able to understand the proposal properly in the allocated time. Many official departments (council offices, planning depts, government depts, etc.) also had long response times due to the pandemic, which further delayed residents obtaining information to assist their understanding of the development.

4. Sunnica's Inability to Answer Questions about the Scheme

- There were many areas that Sunnica was unable to answer questions about despite being asked repeatedly: Proposed decommissioning plans, how many solar panels they'd be installing, details of the batteries to be used in their storage systems, how the batteries/panels were going to be sourced, traffic impacts and road damage, any alternative sites that they might have considered, etc. If they could not answer these details, they should have at least provided a 'best estimate' or a 'worst case scenario.' They didn't do this. During a consultation, a developer is meant to provide sufficient information to allow consultees to assess the impact of the scheme. But with so much information missing, residents could not accurately assess the impact it would have on their villages. We really need a second round of consultation to allow more of these questions to be answered.
- I emailed Sunnica twice with a question but heard nothing back. One was about whether they make almost all their money by **energy price arbitrage**, rather than by producing electricity from solar. The other was about whether the halon **fire suppression** system in each battery container could cope with a real electrical fire. These Li Fe batteries burn very fiercely, and I doubt any suppression system can cope with such a fire. Indeed, the Fire Brigade just let them burn themselves out, since anything they try to do will make the fire worse.

5. Misleading Statements / Poor Advertising

- No mention of **the huge size and scale of the scheme in the brochure**. Implies that the scheme is 'just another' solar farm (typical size for existing solar farms in this area is around 25-150 acres, not ca. 2800 acres...some 20 times bigger!), but it is clearly of a vastly different magnitude. This should have

been highlighted on the front cover of the brochure to draw people's attention as to what the scheme entails.

- In the brochure and newspaper advertisements the proposal is described as “a new solar energy farm and battery storage facility connecting to the Burwell National Grid Substation in Cambridgeshire.” No mention of the exact location. No mention of the size and scale. No mention at all of the fact that it is in Suffolk as well as Cambridgeshire. So residents in Suffolk will not have considered this relevant to them.
- No information in the brochure about how the scheme will operate – nothing about the huge battery plants that are intended for '**energy trading**' of solar and fossil fuel energy types. If this is the money-making side of the scheme, why was this not disclosed? Why are the batteries so far from the Grid, and so close to residential areas?
- In the brochure, Sunnica claims to have made the scheme 'smaller.' **This is not true.** They have simply split the scheme over 4 areas instead of 3, which now directly impacts 2 more villages (West Row and Isleham).
- No **visible advertising** about the consultation in the villages (e.g. posters, banners) until one Parish Council requested this. Sunnica eventually sent a single small banner to each village, which arrived well into the consultation (after approx. 7 weeks). By the time they arrived, the second national lockdown was in place so residents were not moving around the villages and didn't spot the small banner.
- 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. **A second round of consultation is needed** to allow proper advertising, especially in community publications (each village has a village newsletter which is circulated to each resident – this would have been an ideal place to advertise the scheme but Sunnica did not use these publications).

6. Complaints

- Councillors representing West Suffolk Council and Suffolk County Council, as well as East Cambridgeshire District Council, have all described the consultation as “**woefully inadequate and laughable**” (ECDC) and “**farcical**” (SCC).
- 3 Cambridgeshire Parish Councils that are directly affected by the scheme had **NO direct contact** from Sunnica.
- Suffolk councillors requested further information from Sunnica so that people can make an informed assessment of the scheme (“The sheer scale of the project means its impact will be significant and very far-reaching”) but this **further information was not forthcoming** during the consultation period.

7. Unsafe Panels

- A recent BBC news article said that most solar panels globally come from China, and that half of these are **made using forced Muslim labour**. I imagine that Sunnica will procure the cheapest panels, made in this appalling way. That must not be allowed to happen.

Finally, may I request that you add all my concerns above when submitting your Adequacy of Consultation representation to the Planning Inspectorate.

Yours faithfully,

J D Bridges



From: Terry Malkin [REDACTED]
Sent: 18 May 2021 16:56
To: Daniel Snowdon <Daniel.Snowdon@cambridgeshire.gov.uk>
Subject: Sunnica

CAUTION: This email originates outside of Cambridgeshire County Council's network. Do NOT click on links or open attachments unless you recognise the sender and know the content is safe. If you believe this email to be spam please follow these instructions to report it:
<https://camweb.cambridgeshire.gov.uk/spam/>

Dear Mr Snowdon,
I should be grateful if you would pass the attached letter to the relevant authority in the Council.
Many thanks
Terry Malkin

17 Little London
Isleham
CB7 5SE
18/5/21

Dear Mr Snowdon,
I am writing as a member of the village community in Isleham. I wish to voice my concerns at the proposed Sunnica solar farm.
I am sure you are aware of the many arguments against this development. Others more knowledgeable than I have no doubt contacted you and expressed their feelings. My own concern is that the directors of the company are being deliberately vague in their answers to issues raised. (In much the same way that the manufacturers of the cladding used on Grenfell Tower were vague about its fire safety.) For example, being challenged about the huge size of the scheme, Sunnica claims to have made it smaller by splitting it into four areas instead of three. This has not reduced the total area. It also impacts two more villages, West Row and my own.
The change from three sites to four meant that the residents of Isleham came late to the process, with little time to review the information before the required consultations began. These "consultations" consisted of a brochure and questionnaire. No public meetings were held. The pandemic provided a convenient reason for this lack of face to face discussion. The directors are aware that their brochure should be read in conjunction with the "Preliminary Environmental Report" but only allow the latter, 900 page document, to be accessed online. A recent survey revealed that 22% of the population do not have the digital skills to do this. Sunnica says that a hard copy is available at a cost of 35p per page!
The company have been vague about the number of panels to be installed and how

they will be decommissioned at the end of their life. There are few details about the batteries. Some say each will be the size of a lorry trailer. I understand a lithium fire is extremely difficult to extinguish and produces highly toxic fumes. Again I am reminded of Grenfell. One hopes it will never happen.

When Sunnica submits it's application to the Planning Inspectorate, the latter will ask if the residents have been sufficiently consulted. I don't believe the residents of Isleham have. I should be grateful if you would pass my comments on to the County Strategic Planning Team.

Yours sincerely

Terry Malkin

Gross, Victoria

From: Nikki Farr [REDACTED]
Sent: 28 May 2021 13:06
To: Barrow, Julie
Subject: Inadequacy of Proposed Sunnica Consultation

[THIS IS AN EXTERNAL EMAIL]

Good afternoon

I write with regard to the inadequacy of Consultation with regard to the proposed Sunnica Scheme. Please be sure that you add our concerns when submitting your Adequacy of Consultation representation to the Planning Inspectorate regarding this scheme. Please see the following points:

Lack of Access to Information:

- Sunnica relied too much on a brochure and questionnaire as a means of 'consulting.' Consulting means 'discussing' - a brochure cannot be seen as a consultation.
- The Sunnica consultation brochure only gave a brief overview of some aspects of the proposal. Anyone who could not access the online information (many village residents in this case) could not make a meaningful judgment about the scheme.
- The Sunnica consultation brochure was meant to be read in conjunction with the Preliminary Environmental Information Report (PEIR) but this was not made available in the villages. There should have been at least 1 hard copy per village ready for the start of the statutory consultation on 22nd September 2020. The PEIR contains additional detail about the scheme and was described by Sunnica multiple times as a 'significant document' which needed to be read. Sunnica only allowed online access to this report, thus discriminating against those without computer access. Sunnica said a hard copy PEIR (900 pages) could be made available at a charge of 35p per page (£315)! Consequently, a significant number of residents were unable to review this.
- There were no face to face consultation events at all, which excluded many villagers who would otherwise have engaged with the consultation. The pandemic was used as an excuse not to hold any physical meetings, but in the first 6 weeks of the consultation period, other events such as farmers markets, neighbourhood meetings, sporting events etc were taking place in a covid-secure way in the villages. There is no reason why Sunnica could not have manned an information stand at these events, and there is no reason why an un-manned information display with large scale maps, the PEIR etc could not have been made available in all affected villages (there are plenty of community buildings in each of these locations).

Webinars

- Webinar scheduling was flawed and took up a significant portion of the consultation period. Sunnica split the webinars out into 'topics' but this meant that people had to wait many weeks until the webinar on a given topic was available. The recorded webinars were not uploaded immediately to the website, so a further few weeks were wasted waiting for the webinar with the topic of interest to be made available to those that missed the live webinar. There is no reason why recorded introductions for each of the topic areas could not have been made available from the beginning of the consultation (22nd Sept), allowing people to listen to these and formulate questions, ready for a Q&A webinar.
- The webinar format itself was a 'closed' format (i.e. a 1-way only presentation). Residents had to register to attend. They had to submit questions in advance or via a chat function. There was no transparency. Some questions were answered, others were ignored. If the questions were misunderstood or incompletely answered, there was no way of going back for clarification. Sunnica should have held the webinars in an open Zoom format, or similar, allowing a 2-way dialogue between the developer and the residents. There is no reason that they could not have done this – it has become the norm for consultations and meetings during the Covid-19 pandemic.

Inadequate Time to Review Information

- The statutory consultation started during a further escalation of the Covid-19 pandemic. During the consultation period, a second (4-week) national lockdown was introduced, which was not adequately compensated for by the 16 day extension to the consultation period. The second lockdown further reduced people's already limited access to information, and the scheme boundary was modified during this lockdown (on 9th Nov) making it even more difficult to properly consult as the scheme changed part way through the process.
- Isleham and West Row residents in particular had little time to review the information as the scheme areas that border these villages in the current proposal were only added just before the statutory consultation began. So most people in these villages weren't even aware of what Sunnica was. The lack of detailed information in the Sunnica brochure, and the escalating pandemic and national lockdown, meant that Isleham and West Row residents had even less time to learn about the proposal.
- Sunnica was slow to reply to written questions, blaming the pandemic. This prevented residents being able to understand the proposal properly in the allocated time. Many official departments (council offices, planning depts, government depts, etc.) also had long response times due to the pandemic, which further delayed residents obtaining information to assist their understanding of the development.

Sunnica's Inability to Answer Questions about the Scheme

- There were many areas that Sunnica was unable to answer questions about despite being asked repeatedly: Proposed decommissioning plans, how many solar panels they'd be installing, details of the batteries to be used in their storage systems, how the batteries/panels were going to be sourced, traffic impacts and road damage, any alternative sites that they might have considered, etc. If they could not answer these details, they should have at least provided a 'best estimate' or a 'worst case scenario.' They didn't do this. During a consultation a developer is meant to provide sufficient information to allow consultees to assess the impact of the scheme. But with so much information missing, residents could not properly assess the impact it would have on their villages. We really need a second round of consultation to allow more of these questions to be answered.

Misleading Statements / Poor Advertising

- No mention of the huge size and scale of the scheme in the brochure. Implies that the scheme is 'just another' solar farm (typical size for existing solar farms in this area is around 25-150 acres, not ca. 2800 acres!), but it is clearly of a very different magnitude. This should have been highlighted on the front cover of the brochure to draw people's attention as to what the scheme actually entails.
- In the brochure and newspaper advertisements the proposal is described as "a new solar energy farm and battery storage facility connecting to the Burwell National Grid Substation in Cambridgeshire." No mention of the exact location. No mention of the size and scale. No mention at all of the fact that it is in Suffolk as well as Cambridgeshire. So residents in Suffolk will not have considered this relevant to them.
- No information in the brochure about how the scheme will actually operate – nothing about the huge battery plants that are intended for 'energy trading' of solar and fossil fuel energy types. If this is the money-making side of the scheme, why was this not disclosed? Why are the batteries so far from the Grid, and so close to residential areas?
- In the brochure, Sunnica claims to have made the scheme 'smaller.' This is not true. They have simply split the scheme over 4 areas instead of 3, which now directly impacts 2 more villages (West Row and Isleham).
- No visible advertising about the consultation in the villages (e.g. posters, banners) until one Parish Council requested this. Sunnica eventually sent a single small banner to each village, which arrived well into the consultation (after approx. 7 weeks). By the time they arrived, the second national lockdown was in place so residents were not moving around the villages and didn't spot the small banner.
- 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. A second round of consultation is needed to allow proper advertising, especially in community publications (each village has a village newsletter which is circulated to each resident – this would have been an ideal place to advertise the scheme but Sunnica did not use these publications).

Complaints

- Councillors representing West Suffolk Council and Suffolk County Council, as well as East Cambridgeshire District Council, have all described the consultation as "woefully inadequate and laughable" (ECDC) and "farcical" (SCC).
- 3 Cambridgeshire Parish Councils that are directly affected by the scheme had NO direct contact from Sunnica.
- Suffolk councillors requested further information from Sunnica so that people can make an informed assessment of the scheme ("The sheer scale of the project means its impact will be significant and very far-reaching") but this further information was not forthcoming during the consultation period.

Yours sincerely

Andrew & Nicola Farr
14 East Fen Road
Isleham
Ely CB7 5SW

Hi both,

More Sunnica representations

Thanks

Dan

From: Peter Knowles <[REDACTED]>
Sent: 07 June 2021 12:49
To: Daniel Snowden <Daniel.Snowdon@cambridgeshire.gov.uk>
Subject: Sunnica Solar Energy Farm

CAUTION: This email originates outside of Cambridgeshire County Council's network. Do NOT click on links or open attachments unless you recognise the sender and know the content is safe. If you believe this email to be spam please follow these instructions to report it:
<https://camweb.cambridgeshire.gov.uk/spam/>

Dear Mr Snowden,

Ref: Proposed SUNNICA SOLAR ENERGY FARM West Suffolk/East Cambridgeshire

We are writing to you as Strategic Planning Officer for Cambridgeshire CC, regarding the proposed Sunnica Solar Energy Farm to be located near Freckenham, Worlington and West Row in West Suffolk and Isleham, Badlingham, Chippenham, Snailwell and Burwell in East Cambs. This would be three times the size of the largest proposed solar farm in the UK and located on good agricultural land. Close to residential properties.

Sunnica have taken advantage of the Covid-19 restrictions to push their scheme through, by denying us the face to face Local Statutory Consultations by only doing 'virtual' consultations. A large number of affected residents are not familiar with Zoom meetings, webinars or Facebook, meaning that we did not have our views fully aired.

The host (Sunnica) was able to select which questions it answered; these sessions were not a true 'two-way' discussion, and with project detail hidden away on the internet, this scheme could not be fully scrutinized.

At a time when many people were in Covid-19 turmoil and had concerns such as lockdowns, sickness and job losses to deal with, we feel it was unethical to have held such an important consultation in this way. You have our permission to include our views in your AoC report.

The operational lifetime of the Sunnica Energy Farm, we are told, would be approximately 40 years.

Who will be responsible for recycling the panels at the end of their lifespan and managing the hazardous waste generated from the lithium batteries?

The decommissioning of this huge scale proposal could lead to many tonnes of toxic waste being left to future generations to deal with. **Is this the cost of becoming carbon neutral?**

We recognise that we need to take swift action in order to slow climate change. We are also in favour of solar power and other renewable energies, but this scheme **risks destroying the very environment that we are trying to preserve.**

Sunnica's proposal **would cover over 2792 acres of highly productive arable farmland.**

This area is part of the region that supplies over 37% of vegetables in the UK, with already 1,630 acres approx. of arable farmland being taken by renewable energy schemes, to remove a further 2792 acres would mean even more food imports thus **increase our carbon footprint.**

According to Government guidelines, ground-mounted solar farms **should** be sited on **brownfield sites.**

The Solar Trade Association estimates that there are 617,000 acres of south-facing commercial rooftops that are not yet being utilized in the UK for solar power.

These, along with suitable brownfield sites, should be utilized for solar panels **BEFORE** we further industrialise our countryside and **lose valuable food producing land.**

Why has our Government not yet sought to implement new laws so that all new buildings, industrial, commercial and residential have solar panels included, as part of 'building regulations'?

Sunnica has conceded that there will be a loss of wildlife species as a result of their huge proposal. There are many well-established wildlife corridors, natural nesting and feeding habitats along with trees hedges and windbreaks existing within these agricultural fields.

Removing them, or attempting to relocate, these established habitats will have disastrous consequences for the species within them, not to mention the damage from HGVs, construction materials, dust, noise, etc. during the 2+ years construction period.

The proposed development site runs over a groundwater Source Protection Zone, used for public water supply. This will be particularly susceptible to contamination, during construction,

decommissioning and operation from possible leaching of the toxic elements within the panels should they be damaged which can happen easily through storms, stones, flying debris, etc.

Battery Power Plant fires are known to be explosive, cannot easily be extinguished and release toxic gases. Yet Sunnica plans to put these units close to roads and a farm shop/cafe.

According to historic England the Sunnica scheme, "Has the potential to cause wholesale destruction of this archaeological landscape."

For the sake of the people and habitats affected, please help stop this ill-conceived Sunnica proposal that would cause **irreversible damage** and be **nothing less than catastrophic** for **the environmental equilibriums of the area**.

As this proposal is a Nationally Significant Infrastructure Project, we would be very grateful if you will consider the points we have raised and act positively to our heartfelt concerns.

Yours Sincerely, Peter and Brenda Knowles 13 East View FRECKENHAM West Suffolk IP28 8HU Date:
7.6.2021

Gross, Victoria

From: Sandie Geddes [REDACTED]
Sent: 26 July 2021 13:38
To: Barrow, Julie
Subject: Sunnica - Inadequacy of consultation

[THIS IS AN EXTERNAL EMAIL]

Dear Ms Barrow

I wrote to you on the 26 April 2021 expressing concern over the inadequacy of Sunnica's Consultation process. I now understand I must request that it be attached to your response to the Planning Inspectorate, and give formal permission for you to do so for purposes of data protection. I consider the Sunnica consultation process wholly inadequate for a scheme of this magnitude:

- the booklet was not very informative, made frequently unintelligible by the use of acronyms and the lack of an explanatory glossary; constant cross-referencing of online PEIR documents was frustrating, and pointless for residents without internet access;
- the online 'Virtual Consultation' excluded residents without computers, computer skills or internet access;
- the online format was time consuming: PEI Reports were unnecessarily verbose and inefficiently arranged (appendices should have been attached to related text); hard copies were not available except at high cost, even the much shorter Non-Technical PEI Report would have cost £10.50;
- webinars are no substitute for public meetings: the introductory webinar amounted to a 1 hour 40 minute lecture, a boring waste of time (all information could have been pre-recorded, then followed up a week or two later with open Q&A sessions);
- presubmitted questions allowed Sunnica to cherry pick those they wanted to answer; there was no opportunity for answers to be challenged or clarified; this did not encourage participation nor did the requirement for pre-registration;
- panoramic photo montages made features unrecognisable; images were selective, only one of Freckenham; no images of the industrial features: BESS compounds, tall substation towers, warehousing etc. having the greatest visual impact, so we have no idea what to expect (these were promised by Sunnica but never materialised);
- public displays and open meetings could have been organised between Lockdowns; Freckenham PC were able to set up public displays at Farmers' Markets and were on hand to answer questions - why couldn't Sunnica have done the same?
- Open Zoom meetings were a safe substitute widely used throughout the pandemic, but Sunnica chose not to use that format;
- Lithium-ion batteries are causing great anxiety, especially in light of recent explosions and fires worldwide, and criticisms from highly respected physicists and engineers, even the solar industry themselves acknowledge that the technology is unstable, yet Sunnica seemed unprepared when asked about the dangers, their response that they were 'not expecting a mushroom cloud' was hardly reassuring;
- We have little solid information about the project: no information on the number of solar panels involved, and no idea of the number of batteries at each site, only that the total area of BESS compounds, substations and other industrial buildings will be an enormous 78 acres;

- Isleham and West Row were included late, so it is unlikely all residents are fully aware of the consequences of the scheme, this also applies to residents of Red Lodge who will be close to the BESS compound at Site East B, Elms Road;
- Energy Trading was not mentioned at the outset, or in pre-statutory consultations, it came out in one of the not very well attended webinars; this changes the whole nature of the scheme, transforming our agricultural landscape into an industrial power plant, yet most of the population know little about it – or about the scheme as a whole;
- It was unfair to hold a consultation in the middle of a pandemic, people were distracted and in no position to think rationally, the consultation only increased our anxiety; a 16 day extension hardly compensated, something of this magnitude deserves more;
- the development will have a permanent affect on our landscape and communities, certainly in my lifetime, and on that basis alone residents deserve full and open Public Consultations; one single 'Virtual Consultation' is inadequate to answer all our questions and concerns;
- a consultation should seek to obtain the views of all participants, that was not possible in this format; it should be a two way dialogue instead it was a statement of intent.

Given the above, it's unsurprising I consider the consultation inadequate. Too many questions have yet to be answered; it doesn't help that Sunnica changed the boundary half way through the consultation but made it difficult to work out the changes as the revised plan had all identifying text removed. It is very unsatisfactory, given the magnitude of this scheme and the profound affect it will have on our lives and landscape. Either this scheme needs cancelling at the outset or we need one or more further consultations when Sunnica have finalised their plans, at a time not inhibited by Covid restrictions, with as many public meetings as necessary to fully inform all communities, including Newmarket and Mildenhall, as the whole area will be affected. This is not a little local scheme.

Yours sincerely

Sandie Geddes BA MSt
7 Mildenhall Road
Freckenham
IP18 8HT

Sent from [Mail](#) for Windows 10

Sunnica :- Adequacy of Consultation.

The comments below reflect Sunnica's attitude not to engage with the communities affected by their proposed scheme.

Newgate Communications failed miserably to take on board the points raised at the non-Statutory public consultation in June / July 2019. The request raised was that going forward any future literature regarding Sunnica should be delivered on "Sunnica Faced Envelopes" to raise the profile of the delivery as many households were unaware of the literature associated with Sunnica during non-Statutory public consultation.

Presentation of the scheme boundary in the Sunnica Consultation Booklet 22 September – 2 December 2020 was poor and confusing. Sunnica's presentation used grey ink, a poor medium to read, whereas black ink would have enhanced detail and definition.

Parameter Plans for Sunnica East A and B and Sunnica West A and B had all Towns and Village names removed. Why would you remove town and village names from such a key consultation document?

The Sunnica Consultation Booklet 22 September – 2 December 2020 failed to declare the site acreage involved on each of the East and West Sites.

Sunnica Consultation Booklet 22 September – 2 December 2020. The booklet was not delivered to some households until after the 22nd September. A consultation of this importance should have been delivered on the start date of the 22nd September.

No "mock ups" were available to show the size and scale of this project which should have been available for the Sunnica Consultation of the 22 September – 2 December 2020. A project classified as a "Nationally Significant Infrastructure Project" should have this detail.

Updates that took place on 07.11.2020 radically changed the format and volume of information presented prior to that date. Why did Sunnica wait 46 days to update this information which changed the format of the original Consultation Booklet delivered on the 22nd September?

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

Webinar meetings were not satisfactory for the following reasons: -

The Sunnica Covid 19 Consultation process is under a cloud of “Age Discrimination”. Many of the older members in these villages have a long association with their village and they care passionately about their environment. They are unsure of the technology, the webinars and the cold phone calls which takes away their physical ability to go to a map and point out their immediate concerns to Sunnica.

Failure to answer written questions in a timely manner to allow for cross examination.

Written and oral questions were answered from a point of view of Sunnica’ s interpretation and allowed for no immediate correction by the addressee.

Sunnica placed too much emphasis on referral to sections in the on-line Consultation Document rather than give a direct answer.

Poor attendance at the webinars is confirmation of the difficulties experienced with the technology available.

The on-line consultation document was not easy to navigate to find answers for yourself. This was further compounded by the adjustment of information on the 07th November which changed the orientation of the original documents issued on 22nd September.

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

John Leitch
19 Mildenhall Road
Freckenham
Bury St Edmunds
IP28 8HT

Gross, Victoria

From: Sandie Geddes [REDACTED]
Sent: 26 July 2021 13:
To: Barrow, Julie
Subject: Sunnica - Inadequacy of consultation

[THIS IS AN EXTERNAL EMAIL]

Dear Ms Barrow

I wrote to you on the 26 April 2021 expressing concern over the inadequacy of Sunnica's Consultation process. I now understand I must request that it be attached to your response to the Planning Inspectorate, and give formal permission for you to do so for purposes of data protection. I consider the Sunnica consultation process wholly inadequate for a scheme of this magnitude:

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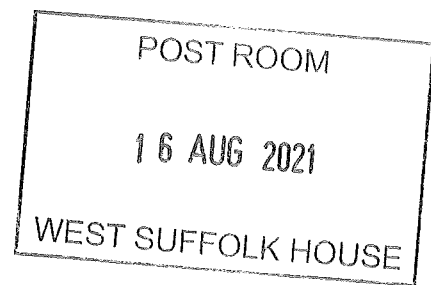
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Given the above, it's unsurprising I consider the consultation inadequate. Too many questions have yet to be answered; it doesn't help that Sunnica changed the boundary half way through the consultation but made it difficult to work out the changes as the revised plan had all identifying text removed. It is very unsatisfactory, given the magnitude of this scheme and the profound affect it will have on our lives and landscape. Either this scheme needs cancelling at the outset or we need one or more further consultations when Sunnica have finalised their plans, at a time not inhibited by Covid restrictions, with as many public meetings as necessary to fully inform all communities, including Newmarket and Mildenhall, as the whole area will be affected. This is not a little local scheme.

Yours sincerely

Sandie Geddes BA MSt
7 Mildenhall Road
Freckenham
IP18 8HT

Sent from [Mail](#) for Windows 10



Sunday 8th August 2021.

28 Acorn Way

Red Lodge Suffolk

IP28 8FY

To West Suffolk District Council For the Attention of Julie Barrow

Dear Ms Barrow

Re Sunnica Ltd Consultation September/December 2020.

We are writing to complain about the inadequacy of the above consultation.

It was conducted during the Covid 19 Regulations which meant we were unable to personally attend any event to meet the 2 Sunnica directors to obtain answers to specific questions we had.

There was complete dependence on the Brochure and webinars.

As to the brochure we found this to give scant information with poorly produced maps, not to scale and virtually unreadable. Road numbers could not be identified and numbered roads were not named. The word farm that is used is inappropriate as the development represents an industrial complex not suited to the environment in which we live.

We would have expected profiles of the 2 directors and their experience in the solar industry and financial information to back up the huge capital cost of the proposed development. The estimated cost of the development should be known as should the plans and estimated costs of decommissioning. There was no split of the 2,800 acre acreage into developable land, non-developable land containing offset/mitigation and archaeological mitigation zones.

The directors of Sunnica Ltd have a legal responsibility to consult and having read the SoCC we do not consider they have fulfilled their responsibility.

It would also have been helpful to have alongside the brochure the PEI Report for ease of reference.

We note on page 29 there is mention of Major Disaster and reference to battery Storage. The directors do not give the acreage of each of the 3 proposed battery sites. E18 is half a mile from our house, 2 primary schools with a total of 1000 pupils and the population of Red Lodge 6,000. It is well documented in national newspapers and Solar journals about the risks of fire, explosion and poisonous gases from Battery Storage facilities. We would have expected an honest opinion from the directors as part of their consultation on those risks to local communities.

My husband and myself, are like so many of our friends and neighbours, certainly not anti-green energy. However within the consultation documentation we should have been given details of all alternative sites they have considered including brownfield sites which should take preference over food producing farmland.

The Webinars were of no assistance to myself and husband as we both work unsocial hours.

The consultation has been so badly carried out that we have had to rely on information provided by the local campaign group and our Parish Council.

In our opinion the consultation should be rerun to give residents of all ages the opportunity to meet the directors and their agents and have one to one discussions on specific issues which will adversely affect the local communities.

The fact there are so many unanswered questions and that the 2 directors have not been transparent with their plans and with Covid 19 working in their favour it is now time to rebalance the dialogue.

If your Council wishes to attach this letter to the Councils main report on the Consultation to the Planning Inspectorate then you have our authority under the Data Protection Act to do so.

Yours sincerely

Helen and Hugh Faulkner



Gross, Victoria

From: [REDACTED]
Sent: 09 August 2021 11:51
To: Barrow, Julie
Subject: Sunnica consultation

[THIS IS AN EXTERNAL EMAIL]

Dear Julie,

There is a note in this month's edition of the Worlington Pump newsletter to say we should let you know if we feel the Sunnica public consultation has been inadequate. I am very much of the opinion that Sunnica have been confrontational in their approach right from the start and the adequacy of the level of consultation is a reflection of that approach. I am concerned that there has never been any intention to work with the local communities constructively to solve the multiple issues that come from building a massive industrial development right up against homes and amenity space.

Plans have always been on much too small a scale to work out how each resident is to be affected, and details of any proposed amelioration are unsure, non-existent or seemingly so long-term as to be meaningless to current residents. For example, looking at the plans for the Badlingham Lane area they seem to me to be intending to rip out existing historic grassland and replace it on a neighbouring site- it is not clear how or why. And how wildlife sites in the area will be safeguarded is not given adequate consideration.

The draft documents are hefty and very technical and full of confusing abbreviations. They are too limited in detail in scope (e.g in terms of existing wildlife), also contain confusions and misunderstanding of the local environment, (e.g in the proper identification of the U6006). Whole sections seem to be contradictory- e.g the construction and ecology sections. Local discussion and exploration of these matters has been severely limited by the conditions of the pandemic.

I am also concerned that as things stand, the Planning Inspectorate is letting them have an easy run- particularly in allowing the use of a Rochdale Envelope, and in allowing them to submit a less than full analysis of environmental factors- how can you know what a 'worst case scenario' is if you don't know what is there in the first place?

Thank you for your assistance in this matter,

Yours sincerely,

Mrs Josie Jennings
25 The Green, Worlington

Gross, Victoria

From: Alan and Barbara Richardson [REDACTED]
Sent: 19 August 2021 14:12
To: Andrew Phillips
Subject: [EXTERNAL] Inadequacy of consultation process by Sunnica

Caution: External email. Do not click links or open attachments unless you recognise the sender and know the content is safe. The original sender of this email is Alan and Barbara Richardson [REDACTED]

Dear Andrew

My name is Alan Richardson, a resident of 28 Mill Lane Fordham and participant in the Sunnica consultation on their solar farm proposal.

I am writing to you in your capacities as Planning Officer for East Cambridgeshire District Council on the inadequacy of the consultation around the Sunnica Solar Farm Proposal.

Sunnica attempted to do the consultation via a set of webinars in the second half of 2020. They took the format of a presentation on a sequence of aspects of the scheme given by Sunnica and then responses to questions entered via a chat facility.

The consultation was inadequate for the following reason as evidenced by specific examples below:

Generally they did not answer the questions entered. Instead they made a statement related to the subject of the question. Unlike in a live meeting where the questioner can probe such an evasive statement, Sunnica used their management of the webinar format to simply move on to the next question having pretended to have performed a genuine consultation.

a. For example, there are significant local concerns over the battery storage element of the programme, in particular its safety. These are not academic concerns, there have been quite a number of fires of grid scale batteries abroad over the last ten years. For instance, a fire at a battery storage facility in Arizona in 2019 killed four firefighters (<https://www.greentechmedia.com/articles/read/what-we-know-and-dont-know-about-the-fire-at-an-aps-battery-facility>) and they are still happening as evidenced by the Tesla Megapack fire in Australia two weeks ago (<https://www.cnbc.com/2021/07/30/tesla-megapack-caught-fire-at-victorian-big-battery-site-in-australia.html>). At the consultation I asked Sunnica about what they had learned from such incidents to inform their design. They responded that they would write a Safety Management plan in due course. My question was trying to probe their expertise on this element of their system and I believe their answer was either evasive or betraying the lack of such domain expertise. But the point is I was unable to challenge that they had evaded the question.

b. This is not an isolated concern to this issue. For instance, there were questions about the decommissioning plan at the end of life. Sunnica responded that towards the end of the construction period they would start paying into a bond to cover decommissioning costs. Again no follow up questioning was allowed. Sunnica are apparently a new company with no track record of major infrastructure projects and no other sources of revenue to buffer overruns on the project here. Thus it is an entirely plausible scenario that the project could fail during construction with Sunnica unable to raise the further funds to complete the projects leaving the costs of decommissioning the unfinished project to have to be borne by the public purse. Again it was not possible to probe their incomplete statement in answer to the question.

I would formally request that my points on consultation are attached to the Local Council's response to the Planning Inspectorate. My view is that given the serious inadequacies in the consultation, further consultation is necessary. I hereby give you permission to share these concerns and waive any data protection rights with respect to this email.

Best regards
Alan Richardson

Gross, Victoria

Subject: FW: Sunnica

From: [REDACTED]
Sent: 22 August 2021 08:04
To: Harvey, Brian <Brian.Harvey@westsuffolk.gov.uk>
Cc: Catherine Judkins [REDACTED]
Subject: Sunnica

[THIS IS AN EXTERNAL EMAIL]

Dear Brian

Re Sunnica Update Newsletter received 19th August 2021.

After you have read this email could I ask you to kindly forward to the Principal Planning Officer at the appropriate Council. They have my authority under the Data Protection Act to send this together with their response to the Planning Inspectorate on the Inadequacy of the Public Consultation.

It is very much a coincidence that when residents are commenting on the very poor way Sunnica handled the Sept/Dec consultation and the Council is about to send their report to the PI that we suddenly receive this document.

Having read it and tried to understand the maps within, in no way does this compensate for the shocking way they failed to communicate with us last Autumn.

On Friday I phoned AECOM who produce the maps and wanted to request from the Sunnica team a scaled version with full details to fully understand how far back the development was from residential properties. The reception advised me it was impossible for her to do this unless I had a named person to speak to which I did not possess. So really a brick wall set up so no resident can access the team responsible for the whole of the Sunnica development proposal. Not acceptable.

I then phoned Sunnica with the same request and spoke to Douglas Johnson. Again nothing would be available to the general public until the DCO was sent in the autumn. It was impossible for me to have a scaled version as per the Update. Not acceptable.

I then went on to advise Mr Johnson that due to the Sunnica proposal my house at 5 Elevenways Freckenham Rd Worlington IP28 8UQ which is on the market for sale had become unsaleable due to the proposed development. I have written evidence from my agent that we recently lost a firm buyer due to the Sunnica energy farm proposal. Furthermore I advised him that at the first public meeting in June/July 2019 at Worlington village hall an AECOM agent agreed to visit our property to discuss the likely affect of the solar panels which would surround our property. This has never happened.

I advised him that on the AECOM map 7/9/20 ref 60589004 it was area E11 that was closest to our property and on the Update Newsletter it was green area 2 (E11) that had been scaled back. Therefore it was an urgent matter to help improve the sale of our property that he told me how far back from the residential properties affected. It was left that he would investigate and also enquire if an agent from AECOM would hold a meeting with us.

To summarise it is once again apparent that the directors of Sunnica are not prepared to be fully transparent with their plans and have no respect for local residents. In addition to their autumn 2020 consultation being inadequate this latest publication must be added to the list of complaints locally.

Yours sincerely

Peggy and Alan Smith Worlington.

Sent from [Mail](#) for Windows

***** This email is confidential and intended solely for the use of the individual to whom it is addressed. If you are not the intended recipient, be advised that you have received this email in error and that any use, dissemination, forwarding, printing, or copying of this email is strictly prohibited. If you have received this email in error please contact the Sender. This footnote confirms that this email message has been swept for the presence of computer viruses and content security threats. WARNING: Although the Council has taken reasonable precautions to ensure no viruses are present in this email, the Council cannot accept responsibility for any loss or damage arising from the use of this email or attachments. *****-W-S-

Gross, Victoria

From: Rodney Knight [REDACTED]
Sent: 18 September 2021 21:34
To: Barrow, Julie
Cc: Diana Knight; Peter Alder
Subject: SAY NO TO SUNNICA

[THIS IS AN EXTERNAL EMAIL]

The latest published configuration of this intended solar array caused us in Barton Mills to become more aware of the campaign against the proposals and to attend the presentation in Freckenham last week.

We became aware that we had not been consulted on the plans for the array and their likely consequences; the huge size, the network of cables, the hideous battery storage units and the extensive dislocation of roads and traffic so close to the A11, already a very busy artery., as the Planning Dpt recognises.

We claim that this is a plan that has not been well enough thought through and that deserves no further currency. **We ask you to SAY NO TO SUNNICA.**

Mr G & Mrs G Piletto
"PRIMROSE HOUSE"
7 Kennett Cottages
Kennett
Newmarket
CB8 7QH

10th October 2021
Ms. Julie Barrow
District Planning Officer

Via email

Say No To Sunnica

Dear Ms. Barrow

My husband and I live in Kennett, Newmarket and our daughter lives in Red Lodge, West Suffolk [REDACTED] for several months we have all been most stressed that we were never informed about any consultations regarding the enormous Sunnica Energy Farm proposal in and around Red Lodge, Kennett, Fordham, Chippenham, Isleham, which would take up good agricultural land and would also be very close to residential properties.

When Sunnica made their so called consultations which were conveniently carried out during a pandemic, they took advantage of the Covid-19 situation to put forward their proposals; myself and many other villagers knew nothing about what was going on.

The whole project will be a major disaster for the villages affected and the surrounding areas, our villages will not be a safe place to live in. The countryside will be no more, just panels and panels taking up our fields of good agricultural land. The developers/corporations involved do not care about this area or our villages, as they will not be personally affected by this scheme so they do not care about the safety of the people who live in these villages or for the wildlife they will make homeless. They are just multiple corporations destroying precious land and our local communities and are only in pursuit of making money, nothing about helping the environment!

There is not a single advantage for the people who will have to live with this for the rest of their lives. Solar panels could be placed on the rooftops of commercial buildings, or on the central reservations of motorways (as is the case in other countries) there are thousands/millions of rooftops in the UK, surely this would be more advantageous to the environment and valuable agricultural land would be safe and used for what they were intended for. We all want to see climate change but this is not the way!

We strongly oppose the Sunnica proposal and hope that the Planning Inspectorate will understand. **Please share with the Planning Inspectorate.**

Yours sincerely,

Grace Piletto (Mrs)

The Caravan Site
Bridge End Road / Elms Road
IP28 8LQ
18TH October 2021


Dear Mr Phillips and Ms Barrow

OBJECTION LETTER TO THE SUNNICA INDUSTRIAL PARK

We have lived at our site off Elms Road for four years with our families. This is our home. We have shown our site shaded red on the attached plan

We are the closest people to the Sunnica East Site B Battery Energy Storage System and the solar panels come right up to our boundary. We estimate we are only 50 yards from the batteries.

We have NEVER been contacted or consulted about this scheme by Sunnica or any representative of Sunnica.

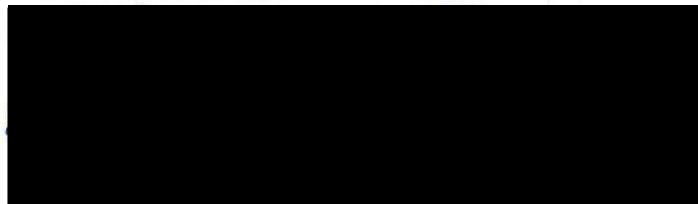
If this scheme was allowed to go ahead it would have a very bad effect on our property. We should have been contacted and consulted. We do not want to live within 50 yards of one of the Largest Battery farms in the world. It will make us nervous and have a very bad effect on our property and our general health and wellbeing. 

We know these types of batteries catch fire, we have heard about thermal runaway, we know if they do catch fire they give off dangerous gasses, and they can't be put out. Why do people have to live so close to them. We must be protected.

It is not acceptable for us to have not been consulted and we strongly object to the scheme, which should be refused. It will destroy the area we live in and is not a green scheme. It will generate more carbon than it saves. Apparently the batteries will have to be replaced 5 times during the 40 years of the scheme

Please contact us as a matter of urgency.

Signed by the Traveller Community Elms Road



Copied to Matt Hancock MP
 Lucy Frazer MP
 Brian Harvey West Suffolk
 Julia Huffer ECDC
 Josh Schumann ECDC

Gross, Victoria

From: Catherine Judkins [REDACTED]
Sent: 21 October 2021 1
To: Barrow, Julie; Andrew Phillips; David Carford; Isaac Nunn
Subject: Recent resident meeting
Attachments: IMG_3744.jpg; IMG_3745.jpg

[THIS IS AN EXTERNAL EMAIL]

Dear all,

I hope you are well. I trust that Sunnica Ltd, as far as you are aware, is still planning on submitting its application on 12th Nov? Please do let us know if anything changes.

I thought you might find the attached interesting from an adequacy of consultation point of view....

Lucy Frazer MP and Matt Hancock MP held a joint meeting last week. You will see that, despite being at a slightly awkward time (3.30-4.30 pm), over 250 residents came along to express their concerns about the scheme. The community action group was aware of more who would have attended had it not clashed with work/ school run time etc.

This is in stark contrast to the very poorly attended Sunnica consultation webinars, which were not properly advertised and were not accessible to a large proportion of the local population.

The strength of local feeling against this proposal has not waned. And there was agreement in the room that the consultation had been inadequate - that people felt excluded, they were unable to access key information to assess the impact, that no details were provided regarding decommissioning (which meant that people could not assess what kind of 'legacy' they might be left with post development), that they were unable to get answers to their many questions from the developer. Indeed, the two MPs had asked Sunnica TWICE to come along to the meeting to help answer questions, but they declined on both occasions.

So the MPs were able to experience first hand how difficult it has been to engage with Sunnica, and even branded them as 'arrogant.'

Please do share this when you come to write your adequacy of consultation submission.

On a separate note, when do the council submit their Local Impact Report?

Many thanks,

Catherine

Sent from my iPhone

Gross, Victoria

From: Heidi Phillips-Klemp [REDACTED]
Sent: 25 October 2021 08:5
To: Barrow, Julie
Subject: Sunnica consultation

[THIS IS AN EXTERNAL EMAIL]

Dear Ms Barrow,

I am writing to you as I am extremely concerned that I have not been informed of all of the details of the Sunnica battery and solar plant proposal. We feel that Sunnica have not given residents enough information during the last consultation, and as this scheme is going to affect where we live I feel that we as residents have a right to know every detail of this farce of a scheme.

Kind Regards,

Mrs Heidi Phillips-Klemp

Sent from my iPhone

From: [Carole Thomas](#)
To: [Barrow, Julie](#); andrew.phillips@eastcambs.gov.uk
Subject: Re: Sunnica Solar Farm proposal
Date: 28 October 2021 13:03:32

[THIS IS AN EXTERNAL EMAIL]

Dear Ms Barrow and Mr Philips

My husband and I moved to Freckenham in February 2021. Since that date, there has been no communication what so ever from Sunnica with regard to the proposed site which, if successful will place us in the centre of a semi industrial environment. Which is not the what we thought we would be living amongst when when we purchased our property.

We do not feel that we have been consulted at all and would urge you to refuse any application which turns agricultural land used for growing food into an industrial si

We would like out views shared with the planning inspectorate.

Yours sincerely
Carole and Oliver Thomas
Elm Road, Freckenham, IP28 8JG

From: [steve gladwin](#)
To: [Barrow, Julie](#)
Subject: Adequacy of Sunnicas Consultation
Date: 28 October 2021 14:05:43

[THIS IS AN EXTERNAL EMAIL]

Dear Julie Barrow,

My family and I live in West Row, it is our 'forever home' with our 2 young boys and we have been put under a lot of undue stress, uncertainty and fear with the proposed Sunnica scheme to destroy wildlife, the countryside and put 40,000 human beings lives at risk from the massive battery plant that has history in other countries of massive explosions and fires. These are at plants nowhere near the scale of this proposed one.

My family and I are all for renewable, wind and solar power energy but not so close to people, breaching their right to not live in fear.

These solar and battery plants can be built offshore on industrial roofs or further away from human life.

My main address to you is that as a resident with a young family who will be living on the edge of this dangerous power plant, is that we have not been provided with sufficient information to be adequately consulted about the Sunnica proposal and we would like our views to be shared with the Planning Inspectorate.

Many Thanks

Steve Gladwin



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Tara Kusch

Woodland House, Elms Rd, Freckenham
Suffolk IP28 8TG, United Kingdom

Ms Barrow
West Suffolk District Planning Officer
West Suffolk House
Western Way
Bury St Edmunds
Suffolk IP33 3YU

20th October 2021



Dear Ms Barrow,

Re: Sunnica Energy Scheme

I am writing in response to the above mentioned scheme to inform you that I feel that the ***statutory consultation has been inadequate*** and that ***I would like you to inform the Planning Inspectorate of this on my family's behalf.***

It appears that a 'Newsletter' and Webinars have in fact been the Consultation. Despite attending the majority of meetings prior to the Covid Lockdown, my husband and I were not aware that the Webinars were being held. I have since heard from friends that the format did not allow for residents who asked questions to confirm whether their questions were adequately answered. How were these Webinars advertised? And how can these possibly be considered adequate?

Regarding the Newsletter, it appeared to be more of an update more than anything else. I have since discovered that 'small little red lines' indicated on the scheme in/near Freckenham represent major road alterations that we knew nothing about.

Finally, despite writing to Sunnica directly with concerns and questions they did not respond. I attach excerpts of this letter for your perusal below. This demonstrates that we had direct questions for Sunnica that were unanswered as well as concerns that we wished to discuss. We received no reply – another strong example of inadequate consultation.

You will note that Traffic was topic that I enquired about at the time of writing and it still remains one of my major concerns. Elms Road floods regularly at the bottom of our drive, pushing commuters into our drive which creates damage. I drive an HGV horse truck up the road about once a week and this one trip causes chaos for both the drivers behind and in front of me. The road is too narrow to allow sufficient passing without causing car drivers distress and significant delay.

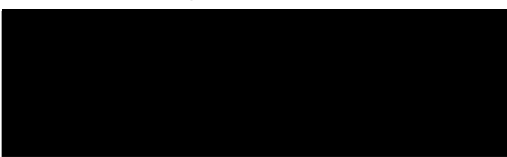
However since attending the meeting with Matt Hancock which Sunnica could not be bothered to attend we now have a more significant concern – the fact our homes (the villages) are being considered the 'buffer' zones between the battery stations. In fact the more we hear about the scheme the more we want to sell up and leave, despite no doubt incurring a significant loss in the

sale value of our home. We simply do not want us and our children to be part of a such a human experiment. I personally represented 3 households consisting of nine people at that meeting. A friend was their representing 8 households from her lane. That meeting was hugely important to all of us and an incredible opportunity for Sunnica to demonstrate what they are doing to allay our fears.

Their arrogance in failing to attend such a well attended meeting with two MPs is simply chilling. It speaks volumes as to their attitude towards us and we can only presume that they are extremely confident about this scheme being approved purely on the basis that they have managed to achieve the scale required for the Battery and Solar Farm to be considered a development of National Importance.

Please do pass on our concerns, we would like our voices to be heard.

Yours Sincerely



Tara Kusch

EXCERPTS FROM MY LETTER TO SUNNICA LAST NOVEMBER

Originally from New Zealand and with a background in property, I am all too aware of the challenges faced by European countries with ever growing populations. I understand the need for sustainable energy but stress the word 'sustainable'. Having lived in a number of European countries I have been impressed (especially by France and Germany) where it is common for solar panels to be located on homes, farm buildings, roofs of industrial & commercial buildings and roofs of carparking walkways. Destroying farmland and negatively impacting so many villages is simply not in line with sustainability. A strategy that encourages businesses and individual households to contribute is, as is locating large schemes on land that is not used for crop production, not located close to residential communities and can be easily hidden from view.

From my research there seem to be many points I could raise here but I do not confess to being an expert in areas of soil fertility, wildlife preservation, green energy, solar energy etc. However, I do look upon the scheme through a residents and property valuation lens. I have therefore perused your Energy Farm Consultation Booklet and wish to raise the following concerns:-

On Construction (page 30)

Sunnica's expectation is a construction period of 24 months yet with the company advising that construction would start Autumn 2022 and the Scheme be operational in Spring 2025, one could surmise that a construction period of 30 months would be more realistic, even longer if one is to factor in delays that inevitably beleaguer schemes of this magnitude.

Sunnica state that 841 personnel vehicles will be arriving/departing from the site. But it is unclear how this has been determined. Given there are 1,260 personnel I will for my purposes base my calculations on that many vehicles arriving to at least one point in the scheme.

Hence, with 1,260 staff required onsite for their 12 hour, 6 days a week shifts, one calculates that up to 1,260 vehicles will be arriving on sight between 6&7am daily, and leaving between 7&8pm each day, equating to 2,520 extra vehicle movements a day. And within the hours stated, that is one personnel vehicle every 2.8 seconds at precisely the time that many commuters are heading off to catch trains to London, leaving to take their children to school buses (we leave at 7.05am), returning from work or returning from childrens early evening activities. I personally return from my sons various sports commitments around 7pm three evenings a week.

The roads around the Sunnica site are small country roads, some even without median strips or drainage, like our road. Recently the Freckenham Parish Council asked for landowners to submit land with potential for residential for a review. They recruited a planning advisor to assess the submissions for development potential. We submitted 10 acres that we own for assessment as we would like to put one house on this block. Whilst it has road access right next to the road access for our home, the planning advisor ruled the block as unsuitable for development. One of the reasons given was due to road access being onto a small country road.

Sunnica is under the illusion that these time periods will mean that construction traffic during peak periods will therefore be mitigated to zero. You seem not to have taken into account the peak traffic periods here. Many of us commute to London for work are actually commuting at those hours. As an example, my husband does this journey 4 or 5 days a week, which means he is leaving home during the times that Sunnica states their employees will be arriving:-

Trains to get to into London Office for 9am

Ely 07.16 (20 minutes drive from us plus 10 minutes parking/walking time)

Cambridge North 7.25 (32 minutes plus 10 minutes parking/walking time)

Trains to get to back from London After Leaving Office at 5.30pm

18.09 Kings Cross to Ely getting in at 19.24

18.09 Kings Cross to Cambridge North 19.12

It would be interesting to see your research as to the times that the farm machinery is on the roads at different times of the year (spraying, watering, harvesting seasons etc).

On Transport (page 27)

I simply do not accept that 'after mitigation it is anticipated that there would be no significant traffic and transport impacts'. Encouraging staff to 'lift share' is simply not an adequate mitigation strategy. We live down the road from a quarry and road cleaners attempt to clear the mud off our roads through winter. This is however never that successful.

On Operations (page 32)

Apparently Sunnica will appoint a management company to maintain and operate the scheme on their behalf. Considering a substantial part of the ongoing maintenance appears to be

management of vegetation and therefore the vegetation that blocks the unsightly development from view, if Sunnica was to sell their interest in this development, will you have any legal responsibility to ensure that the Scheme is adequately maintained?

On Battery Fire Risk (page 29)

From my understanding the exclusion/evacuation zone for Sunnica scheme would be extremely large given the number of battery units that would be required. On page 29 of the booklet under 'Major Disaster' they state in the summary section:-

'After mitigation, it is anticipated that there would be no significant major accidents and disasters effects from the scheme'.

Do Sunnica believe the risk of a fire is simply zero?

On Decommissioning (page 32)

As the scheme will destroy wildlife corridors, nesting and feeding habitats and require the removal of natural trees, hedges and wind how do Sunnica propose to ensure these are replaced and encouraged back into the area?

On Community (page 33)

What precisely are the ecological enhancements which have the potential to contribute to local biodiversity?

The Scheme will also apparently create local economic benefits during the construction process which includes the use of local suppliers and businesses. Would it be possible to see the list of these local suppliers/businesses that Sunnica intend to utilise and the likely amount of spend with each one?

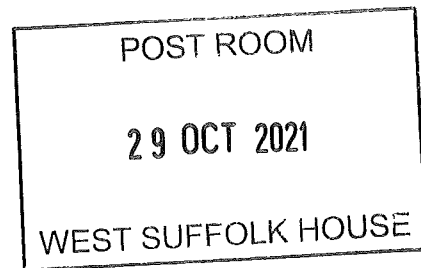
Once the scheme is in place, will there be any ongoing economic benefits for the local community at all, that will go some way toward outweighing the negative aspects of the scheme and the risk to all local residents?

Regarding the dedicated skills program for local people, would it also be possible to see have more information provided regarding these programs?

No mention is made on this page or anywhere in the document as to the potential HUGE impact to property prices in our area. This simply cannot be denied. Has Sunnica carried out any impact analysis and will Sunnica or the government be offering any compensation to property owners? A friend of mine employed in sustainable development (he works for a company putting solar schemes into golf courses) carried out some back of envelope calculations and estimated that the development could earn nearly £15 million pounds annually, cica £600 million over the 40 year period. A huge amount of corporate profit at the expense of local home owners. How will the impact on the value of our individual properties be mitigated? How will we be compensated?

Lola Jagger
The Annex
Woodlands House
Elms Rd
Freckenham
Suffolk IP28 8JG

Ms Barrow
West Suffolk District Planning Officer
West Suffolk House
Western Way
Bury St Edmunds
Suffolk IP33 3YU



18th October 2021

Dear Ms Barrow,

Re: Sunnica

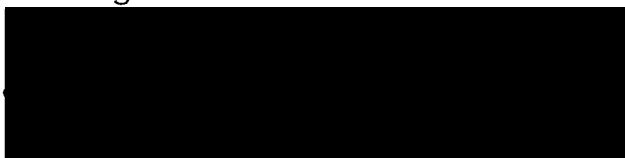
I recently attended a Community meeting with Matt Hancock about Sunnica. After that there was an open evening by the SayNoToSunica Action Group.

I discovered many things about the Sunnica Scheme of which I was not aware:-

1. The size of this scheme is absolutely massive.
2. I am going to be living in a Solar and a Battery Farm.
3. The road I live on is going to be used for Trucks.
4. I leave for work around 6am every morning to the vegetable factory, right when many of the workers will be coming to the site.
5. Sunnica believe the land to be unproductive farm land - myself and the other employees at my vegetable factory would beg to differ.

I spoke to many of the workers at the factory and very few of them know about the scheme as well. Could you please inform the Planning Inspectorate that I have definitely not been properly informed about the Farm.

Kind regards



From: [Kieran Coffey](#)
To: [Barrow, Julie](#)
Subject: Fwd: Sunnica proposal
Date: 31 October 2021 16:28:50

[THIS IS AN EXTERNAL EMAIL]

Dear Madam,

I am writing to you in relation to the proposed Sunnica solar scheme in my local area.

I feel that I have not been provided with sufficient information to be adequately consulted about Sunnica's proposal and I would like my views to be shared with the Planning Inspectorate.

There has been a lack of sufficient documented information provided by Sunnica, such as accurate and detailed maps of the site with relevant site access indications etc.

The consultation period ran at a time when there were no or limited in-person consultation meetings and therefore was insufficient in offering local residents an opportunity to find out about or ask questions on the proposal. Providing virtual or online content is not sufficient and discriminates against members of the community that do not have access to the relevant technology or online services.

As an interested local resident, I am appalled at the level of information provided by the developers considering the huge scale of the proposal and I trust you will make this known to the Planning Inspectorate.

Thank you.

Best regards,

Kieran Coffey.


41 Harebell Road

Red Lodge

IP28 8TY

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

TO Julie Barrow Principal Planning Officer Planning Development West Suffolk.

Copies to

Brian Harvey District Councillor.

Lance Stanbury County Councillor

Matthew Hancock MP.

Planning Inspectorate and BEIS for attention of Chris Mulvee

FROM Mr Alan Smith on behalf of self and wife, Mrs Peggy Smith, address 5 Elevenways Freckenham Road Worlington Suffolk IP28-8UQ [REDACTED]

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

Introduction.

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

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

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

Sunnica Energy Farm Non-statutory public consultation.

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

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

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

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

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

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

Campaign Group

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

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

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

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

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

Statutory Consultation.

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

Longfield Solar Farm by Longfield Solar Energy Farm Ltd.

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

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

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

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

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

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

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

Webinars.

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

As my wife and I are both in this category we were unable to take part due to our very limited computer knowledge. Therefore it is only fair for me to leave it to those that could participate to put forward their comments.

Consultation Booklet

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

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

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

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

Page 12 “Solar PV technology”

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

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

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

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

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

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

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

Turning now to the EA report on Cleve Hill page 69 para 5.3.19 and 5.3.20 that applicant applied for East-West orientation in the knowledge that design was less efficient than a South facing arrangement. However the loss of efficiency was then offset by a higher density of solar panels.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

So why are Sunnica negotiating 40 year leases with landowners?

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

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

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

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

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

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

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

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

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

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

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

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

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

Compulsory purchase

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

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

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

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

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

In connection with this:

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

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

Evidence can be submitted as follow.

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

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

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

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

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

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

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

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

Conclusion

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

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

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

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

From: [Nikki Farr](#)
To: [Barrow, Julie](#)
Subject: Proposed Sunnica Solar Farm East Cambridgeshire
Date: 03 November 2021 12:16:33

[THIS IS AN EXTERNAL EMAIL]

Dear Sirs

Please direct our email to the responsible department and ensure that our views will be shared with the Planning Inspectorate – thank you.

We object to this planned Solar Farm for so many reasons. Firstly, it is way too big – it won't just be a Solar Farm it will be a Power Plant covering all our local green fields. This is a rural area, as you know, and it will be devastating for all of us to lose such rich and diverse farmland. We will be looking out on an industrial landscape, it will change the area forever with all the panels, batteries, fencing, noise and light pollution.

It would appear that Sunnica is an inefficient, opportunistic, 'hotch potch' design with panels littering our countryside on four sites with over 15 miles of pipelines crossing roads, rivers, streams, pathways, public rights of way and hedgerows. The land that has been proposed is good, valuable farmland producing high yielding crops. To improve our environment there is a need to reduce the carbon miles our food travels and improve our food security as the global population continues to grow. Using good farmland for this project seems such a complete waste.

This scheme will destroy all the wildlife corridors and nesting and feeding habitats, which once they are gone will not easily be recovered. The screening of trees and shrubs Sunnica have committed to will take years to grow to a height which will obscure the 2.5m panels. They will take much longer for them to grow to a height to screen the Battery Energy Storage Systems. I do not believe that the wildlife will recover and return.

The construction of this site will create chaos through the estimated two years it will take to complete. We all know projects on this scale always overrun so it potentially means chaos for much longer. With the constant flow of construction traffic, HGVs, abnormal loads and staff vehicles creating noise and traffic through our villages. There will be many road closures, diversions and muddy, dangerous conditions. There will be a negative effect on our mental health as well as the pollution created which will have an impact on old and young alike, especially those with lung conditions such as COPD and asthma, this has the potential of being lethal.

It would also seem that Sunnica have shown a negative balance in their last set of accounts. This is extremely worrying, a company with this financial standing working on a Nationally Significant Infrastructure Project involving hundreds of millions of pounds. It is important that there is a provision to clear the site should the scheme become bankrupt during its planned 40 year life and then once it's life is complete. This scheme will not supply sustainable energy to us local housing, it will be sold for profit to the large corporations and the National Grid. The energy will be exported from the grid at cheap, off peak times and sold back at peak times, using the battery

storage to generate huge profits from energy trading. This isn't 'Green Energy', this is profiteering. There really is no benefit for the local economy or community, it is not anticipated to create any long term local jobs, instead the local farming community will lose jobs.

On top of all this our property values will fall. It has been estimated by local estate agents our property values will fall by anywhere between 10 – 20%. This is due to the negative impact of such a project going ahead on our doorstep. Not just the reasons outlined above but the dangerous technology they are proposing to use. The Lithium-ion Batteries used in the three Battery Energy Storage Systems are potentially dangerous, and have been banned in some States in the USA. They pose an 'unacceptable risks', due to having caused uncontrollable fires, the fumes omitted being toxic and extremely hazardous to human life. Who wants to live near those?

We are all in favour of 'green energy' and believe there must be better ways to achieve this. Solar Panels on all new builds, on large supermarkets and shopping centres, on car parks. Solar Farms built on useless land ie. old quarry sites, airfields, unused industrial land, landfill sites etc.

It appears that Sunnica are using the Covid 19 pandemic to avoid having meaningful 'face to face' consultations in our villages. Indeed, our village (Isleham) was not even originally included in their proposals so allowing them not to have contact with us locals and the community. It seems clear that in the aftermath of the Non-Statutory Consultation, they did not acknowledge or act on the concerns raised by the local population who were consulted. We cannot let this happen again. This is the last time that we will be able to have a say on the project so please, please help our communities and stop this happening to our beautiful, rural villages.

Thank you for taking the time to read my email and we hope you are able to support us with our objections to this impractical and destructive proposal by Sunnica.

Yours sincerely

Andrew & Nicola Farr
14 East Fen Road
Isleham
Ely CB7 5SW

From: [wallissnailwell](mailto:wallissnailwell@btinternet.com)
To: [Andrew Phillips](mailto:Andrew.Phillips@btinternet.com)
Subject: [EXTERNAL] Re: No to Sunnica - my concerns and objections
Date: 29 October 2021 13:32:20

Caution: External email. Do not click links or open attachments unless you recognise the sender and know the content is safe. The original sender of this email is wallissnailwell <wallissnailwell@btinternet.com>

To: Mr. Andrew Phillips, District Planning Officer, East Cambridgeshire District Council

Dear Mr. Phillips,

Good afternoon.

I live in Snailwell and have done so for more than 30 years. I have to say that that I am very unhappy with

the lack of consultation from Sunnica about their plans and intentions to construct a large 2,500-acre

solar farm in this area covering villages in East Cambridgeshire and West Suffolk. There has been no discussion or meetings arranged by Sunnica since an initial meeting here in Snailwell in late 2019 to explain their plans or listen to views of residents in Snailwell. Sunnica were invited to attend the meeting held in Isleham several weeks ago that I and my wife attended but we were advised they declined the invitation to attend. That sends a clear message to all the villages that would be affected by this application if succeeded.

Sunnica do not care what residents in the villages concerned think.

I have range of major concerns being the impact on the environment, scale of the development, loss of quality farming land, the very large number of trucks on the village roads every day over an extensive period, including in Snailwell, that has its own restrictions and then, the worry of the large lithium batteries catching fire as has happened in Liverpool, in Japan and in the USA.

Please kindly share my views with the Planning Inspectorate. Thank you.

Kind regards,

Michael Wallis

wallissnailwell@btinternet.com

|

From: [Netty Flindall](#)
To: [Andrew Phillips](#)
Subject: [EXTERNAL] Sunnica
Date: 25 October 2021 17:02:30

Caution: External email. Do not click links or open attachments unless you recognise the sender and know the content is safe. The original sender of this email is Netty Flindall <nettyflindall@hotmail.com>

Dear Andrew,

Firstly, I would like you to know that I am happy for this letter to be shared and I will be registering as an 'Interested Party'

The sheer audacity and non communication by Sunnica was endorsed when both Matt Hancock and Lucy Frazer's office invited Sunnica to a meeting with the residents, that they were attending at The Beeches in Isleham. Sunnica refused to come. If our MP representatives are not acknowledged by this group what chance have we as residents! Residents of Isleham were inadequately consulted, due to a late change in the scheme boundary to include land around this village (after a neighbouring farmer withdrew his land from the scheme). So the vast majority of residents were unaware in the impact that it would have on them.

The Statutory Consultation was conducted during the Covid Pandemic. It caused a huge amount of undue stress and anxiety at a time when people were already under pressure. Landowners and residents who do not want to be part of the scheme have been systematically bullied and pressured into allowing Sunnica Ltd onto their property or being threatened with compulsory purchase/ compulsory access/leasing. It is unacceptable that these hardworking individuals are being treated in this manner, particularly during a time of such vulnerability. Not only has this caused significant stress, but also financial hardship too. as many of these people have had to seek legal advice to counter Sunnica's demands The Statutory Consultation was appalling, conducted primarily by a glossy brochure with limited information about the scheme. There were no physical meetings to engage with residents (even though this was possible in the early part of the consultation period) and no information displays. Limited 'Zoom' meetings were held, but were poorly advertised and consequently poorly attended. Many were frustrated as they had no access to computers or did not even know what a zoom was

For those that did access the Zoom meetings, they were disappointed and frustrated that there was no two-way dialogue. Questions could only be submitted in advance or typed in the 'chat' and these were either unanswered, or poorly answered. Often saying that they would get back to us later (which they didn't) or for us to consult the Preliminary Environmental Information Report, PEIR (a 900+ page document) for answers. But the PEIR was not made available in the villages, despite requests from Parish councils and Councillors to ask for hard copies in each of the villages.

as many of these people have had to seek legal advice to counter Sunnica's demands The residents feel totally lacking in any ability to fight this due to restrictions during Covid, being unable to engage with their local community, or talk to family, friends and neighbours about their concerns. This project will have a massive impact on the

communities both now and in the future; residents feel they have no control over the environment they will be forced to live in. They are frustrated that their voices are not being heard, that they somehow don't count. Many feel despondent. Families have moved here specifically to raise their families in the countryside, recognising the health benefits of access to wide open spaces and huge skies, both mentally and physically. This appreciation of the area around has been particularly important during the pandemic and lockdowns. Residents, visitors and other recreational users alike use these open spaces regularly. They do not want to be surrounded by miles of oppressive fenced-off fields of metal and glass and battery units etc.

I just wanted to state that the Say No to Sunnica Community Action Group is NOT against renewable energy. We are a passionate group who are for Community, Environment and Wildlife. The scheme is a NSIP proposal on vast areas of highly productive agricultural land (Sunnica claims otherwise), rather than on brownfield sites (which is the preference according to the Government's planning guidelines).

The size of this proposal is absolutely enormous (approx. 2,700 acres) and will affect 13 local villages, as well as neighbouring towns. It is completely inappropriate for the area and will overwhelm and isolate the farming communities. There are already 20 solar farms in use / under construction within a 15 mile radius of the proposed Sunnica site. There are many other places that could be used for solar panels, with far less ecological impact - Industrial, Commercial and Residential roof tops, for instance.

This is a NSIPS and I was unable to find any national strategy for Solar, If this is the case then we urgently need one.

Residents selling properties have also incurred considerable stress, with offers being withdrawn once the potential purchasers became aware of Sunnica's proposed plans. The proposed battery storage system would be amongst the largest in the world and this is causing a huge amount of worry. A recent research paper has raised safety concerns about these, since there are currently no adequate engineering standards to prevent or mitigate fires (a known hazard of these systems). Battery fires have the potential to explode. They are notoriously difficult to extinguish, often being left to burn out. But whilst burning they produce Hydrogen Fluoride gas, which is highly toxic in very small quantities. You will no doubt have seen news of the fire a few weeks ago in Illinois at a battery warehouse.

Thousands of residents were evacuated from their homes for 3 days because of the toxic gas emissions. And even when they returned to their homes the Red Cross issued them with cleaning equipment and instructed them to clear all outdoor play equipment, BBQs etc to remove the toxic residues. This is not something we want to witness. Sunnica Ltd has no experience in battery storage, telling us "It's a very steep learning curve".

Consequently this is causing panic amongst residents - especially those with children in the primary schools that are in close proximity to these batteries.

Madeleine Greenhalgh of ReGen (renewable storage network) stated on BBC Radio Cambridge (15th July) that "the likelihood of any incident of fire may be low but when it does happen it could be severe." Madeleine states that, "The Developer needs to provide reassurance to the community." But this has not been forthcoming. Luke Murray of Sunnica commented during a webinar that "we will be sad if thousands of lives are lost" . That is not reassuring the community!

- Over 14 miles of cable will be laid by Sunnica to connect to the local grid, digging up roads, pathways, fields, woods and streams in their wake. Many local footpaths, bridleways and cycling routes will be closed for the 2 year construction period. These offer a lifeline to many for recreational activities, dog walking, horse riding as well as commuting between villages etc. When they do eventually re-open, these public rights of way will be vastly different - fenced off footpaths and bridleways with noisy inverters and solar panels either side, depleted wildlife habitats, etc. It will be more like walking through a prison camp rather than the beautiful countryside that we currently enjoy.

There are no plans to source components ethically. There have been no plans put forward for decommissioning and recycling. Sunnica informed us on a Webinar that they would be selling the project on. Residents are fearful that they will be left with a graveyard of millions of solar panels and batteries.

The land that Sunnica wishes to develop currently provides enough food for 3 million people each year (based on average consumption). This area is regarded as the 'Bread basket of England'. If this is taken out of arable production for up to 40 years, not only will it have a huge impact on the local economy but will most likely lead to food imports, making a mockery of reducing the carbon footprint. We are proud to support our farmers here and proud to do our bit by sourcing local produce. It doesn't make sense to take this away.

Historic England states that the Sunnica scheme 'Has the potential to cause wholesale destruction of an archaeological landscape.' Cambridge Wildlife Trust commented that the Sunnica scheme design was "The worst we have ever seen". The installation of an industrial solar and battery plant on productive farmland and wildlife habitats is definitely Not Green. The development runs over groundwater sources and chalk streams, both of which will be susceptible to pollution from the scheme. The proposed layout will destroy wildlife corridors, nesting and feeding habitats. Trees, hedgerows and windbreakers will also be affected.

This proposal is all about Greed not Green and is a disastrous example of obtaining renewable energy. I pray that Boris Johnson and Kwasi Kwarteng do not agree to this proposal due to their worries and feeling pressurized regarding the climate conference not being a success. Sunnica is submitting their proposal on the 12th November 2021 just as COP26 finishes.

This quote is from Lucy Frazer, our local MP: "Issues around development and the environment must always be weighed carefully, but a vital principle is that large scale or significant projects enjoy the consent and support of the local community".

Please can you confirm you have received this email. Thank you.

.Yours sincerely, Annette (Netty) Flindall

Sent from [Mail](#) for Windows

From: [Denis Field](#)
To: [Barrow, Julie](#)
Subject: Sunnica Consultations
Date: 03 November 2021 18:36:57

[THIS IS AN EXTERNAL EMAIL]

Dear Julie,

I am writing to you to voice my concerns regarding the lack of information forthcoming from Sunnica regarding their proposed monstrous solar and battery storage 'farm' that will engulf five villages and change the vista of this entire area. I have, on numerous occasions, contacted them requesting answers to my questions, however my requests have, for the most part, been ignored. On one occasion I did get a reply, they instructed me to look at their website. Please note the majority of the information on their site appears to be out of date and/or extremely hard to locate.

I wish to go on record stating that their 'Consultation' has been a complete farce, as a local resident not one of my questions has been adequately answered by Sunnica. I even joined a 'Webinar' but my question was not even read out, let alone answered.

Sunnica should not be permitted to proceed with their application until they have adequately consulted with the 40,000 local residents that will be directly affected by their industrial power plant.

Please do use my name in registering my complaint.

Kind regards,

Denis.

From: [Denis Field](#)
To: [Barrow, Julie](#)
Subject: Sunnica Consultation
Date: 03 November 2021 18:47:30

[THIS IS AN EXTERNAL EMAIL]

Dear Julie,

I am emailing you on behalf of my elderly mother Mr Lola Field, a resident of Worlington.

She has asked me to inform you that as an OAP she does not have access to a computer and has therefore not been able to glean any information about the Sunnica proposal, apart from one booklet and the recent 'Update flyer'. Unfortunately she has poor eyesight and was unable to see the maps.

She does not feel she has been adequately consulted and would like Sunnica to run a local face to face Consultation so that she can make an informed judgement on whether the scheme is acceptable or not.

She gives permission for her view to be used as necessary.

For and on behalf of Mrs Lola Field.

ISLEHAM PARISH COUNCIL

Clerk: Richard Liddington
The Beeches
32 Mill Street
Isleham
CB7 5RY



E mail: islehampc@gmail.com

Mr A Philips
Senior Planning Officer
ECDC
The Grange Nutholt Lane
Ely
CB7 4EE

28th September 2021

Dear Andrew

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely



R. Liddington
Parish Clerk

cc. Sunnica
Lucy Frazer MP
Julie Barrow West Suffolk District Council

Mr G & Mrs G Piletto
"PRIMROSE HOUSE"
7 Kennett Cottages
Kennett
Newmarket
CB8 7QH

10th October 2021
Mr. Andrew Phillips
District Planning Officer

Via email

Say No To Sunnica

Dear Mr Phillips

My husband and I live in Kennett, Newmarket and our daughter lives in Red Lodge, West Suffolk with her young family, for several months we have all been most stressed that we were never informed about any consultations regarding the enormous Sunnica Energy Farm proposal in and around Red Lodge, Kennett, Fordham, Chippenham, Isleham, which would take up good agricultural land and would also be very close to residential properties.

When Sunnica made their so called consultations which were conveniently carried out during a pandemic, they took advantage of the Covid-19 situation to put forward their proposals; myself and many other villagers knew nothing about what was going on.

The whole project will be a major disaster for the villages affected and the surrounding areas, our villages will not be a safe place to live in. The countryside will be no more, just panels and panels taking up our fields of good agricultural land. The developers/corporations involved do not care about this area or our villages, as they will not be personally affected by this scheme so they do not care about the safety of the people who live in these villages or for the wildlife they will make homeless. They are just multiple corporations destroying precious land and our local communities and are only in pursuit of making money, nothing about helping the environment!

There is not a single advantage for the people who will have to live with this for the rest of their lives. Solar panels could be placed on the rooftops of commercial buildings, or on the central reservations of motorways (as is the case in other countries) there are thousands/millions of rooftops in the UK, surely this would be more advantageous to the environment and valuable agricultural land would be safe and used for what they were intended for. We all want to see climate change but this is not the way!

We strongly oppose the Sunnica proposal and hope that the Planning Inspectorate will understand. **Please share with the Planning Inspectorate.**

Yours sincerely,

Grace Piletto (Mrs)

From: [Jennie McClure](#)
To: [Barrow, Julie](#)
Subject: Sunnica consultation
Date: 09 November 2021 18:51:35

[THIS IS AN EXTERNAL EMAIL]

Dear Julie Barrow

I am contacting you in regard to Sunnica's plans for a solar farm in the local area.

I feel strongly that their consultation with residents has been inadequate, and information provided by the company insufficient in light of the size and scale of the proposed project. There are legitimate and grave concerns locally over safety and fire risks as well as the loss of huge swathes of fertile farmland and enormous dissatisfaction that greater resources and staff time have not been given over by Sunnica to provide more opportunities to meet affected residents and fully address these issues. I appreciate this email is brief but confirm that I would like my views to be shared with the Planning Inspectorate.

Thank you very much for your time.

Yours sincerely

Jennie McClure

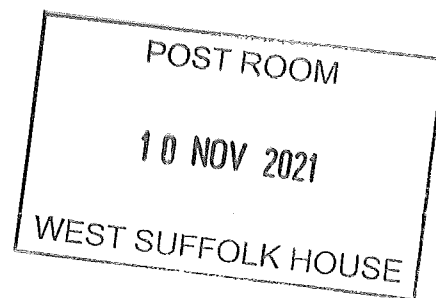
Gemma Rolfe
Elms Farm
Elms Rd
Freckenham
Suffolk IP28 8JG

Ms Barrow
West Suffolk District Planning Officer
West Suffolk House
Western Way
Bury St Edmunds
Suffolk IP33 3YU

Via Post

26th October 2021

Dear Ms Barrow,



Re: Sunnica Solar Farm

I would like to request you to inform the Planning Inspectorate that in our view (my partner's and I) the statutory consultation concerning the Sunnica Solar Farm was inadequate.

We recently attended the meeting with Matt Hancock where significant concerns were voiced and no Sunnica representative was present to answer any questions or allay any fears. And fears we definitely have.

We attended the SayNOToSunnica evening afterwards to find out that there had been Webinars during Covid. We didn't know anything about these. How is that possible?

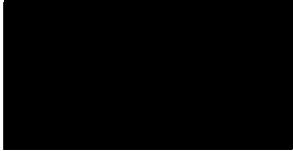
We have also found out via the action group that there will be significant traffic on our road and significant alterations to roads in Freckenham as well as the 'Green Road' (by Lincoly Kennels) which I hack up about three times a week. It's the only bridleway I have to use and I have been told that it may close for up to two years during the construction period. Our home is right on the road and so are our stables. I have significant concerns about the noise from Truck traffic causing distress to the enjoyment of our home, not to mention the welfare of my horses. I hardly consider myself informed if I have only just found this out.

Matt Hancock made a number of extremely valid points stating that in his view he considers the farm as much as a Battery Farm as a Solar Farm. We were astounded as to the extent of the batteries and had no idea as to their size.

How did we not know this either? We have a young family and this is of significant concern to us.

I would like to reiterate my point at the beginning of the letter....could you please let the Planning Inspectorate know that we have not been informed of the true extent of impact of the scheme.

Kind regards



Gemma Rolfe

From: [Julie Thornalley](#)
To: [Barrow, Julie](#)
Subject: Saying No to Sunnica
Date: 11 November 2021 22:06:43

[THIS IS AN EXTERNAL EMAIL]

Dear Julie Barrow

As a resident of Worlington, I would like to convey my objection to the Sunnica proposal.

There has been very poor communication and information from Sunnica to the residents. The printed material that they sent (once) had small maps which made it hard to understand where the exact proposed sites are. The layouts were confusing and unclear.

Any public consultations via Zoom were unacceptable as they would be inaccessible to many (most) people. Sunnica may have 'said' they were consulting people, but they were taking advantage of the inability to meet in public due to the pandemic. It became convenient for them to hide behind the lack of direct access to them from the public and so allow them to continue with their plans relatively unchallenged.

I would like my views to be shared with the Planning Inspectorate.

Thank you

Regards
Julie Thornalley

From: [v.mcclure](#)
To: [Barrow, Julie](#)
Subject: Sunnica Consultation
Date: 14 November 2021 18:31:50

[THIS IS AN EXTERNAL EMAIL]

Dear Ms Barrow,

This in regard to the plan by Sunnica for a solar farm in the area of Suffolk and Cambridgeshire.

We feel very strongly and much against the idea of the plans such as they are.

While not against solar power, but this plan for a solar farm in the present size and scale is much against the thinking and safety of ourselves and residents in this area and far afield.

Grave concerns particularly for the safety of many, many residents over the fire risks and the management of such an outbreak is unimageable.

We don't feel that we have had proper consultation about this and after going along to a well attended meeting in October, held in Isleham, where MP's for West Suffolk and Cambridgeshire joined us, invited Sunnica representatives were evident in their absence. I'm afraid this just added to the thinking of arrogance and lack of commitment to addressing residents issues surrounding this whole project.

I realise that this is being sent later than I had hoped for but we would like this to be shared with Planning Inspectorate.

Yours sincerely,

Valerie and William McClure

Dear Andrew

I am writing to you to express the concerns of many of my constituents about the manner in which the Sunnica consultation was conducted and the manner of the response to the residents when they tried to engage with Sunnica to express their concerns.

From the outset it seems to many of my residents that Sunnica used the pandemic to run a sub standard, dismissive consultation, relying too heavily on Webinars that were woefully inadequate as questions went left unanswered and leaflets that were vague and made responses difficult. Many of my residents are elderly and aren't able to access the internet in any meaningful way. Their voices have been stifled or ignored.

The arrogance of Sunnica is quite frankly breathtaking, from the beginning it was evident that they took advantage of the Pandemic to do the bare minimum in terms of meaningful dialogue with quite rightfully concerned residents.

I would ask the Planning Inspector to ensure that a fair honest and engaging consultation takes place with a community whose lives will be altered for generations should this scheme go ahead in its present form.

All those affected by this proposal should be allowed to have their questions answered, not casually disregarded and dismissed as irrelevant.

Can you please ensure that this email is attached to the responses submitted to the Planning Inspector.

These are the opinions of myself and my residents and not the opinions of East Cambs District Council.

Many thanks Julia Huffer

District Councillor Isleham and Fordham Villages ward .

From: [Dr Harry Sidebottom](#)
To: [Andrew Phillips](#)
Cc: ["Dr Harry Sidebottom"](#)
Subject: [EXTERNAL] Sunnica
Date: 15 November 2021 10:57:47

Caution: External email. Do not click links or open attachments unless you recognise the sender and know the content is safe. The original sender of this email is Dr Harry Sidebottom <harry.sidebottom1@btinternet.com>

Dear Andrew Phillips,

I am writing to let you know that I do not feel that I have been provided with sufficient information to have been adequately consulted by Sunnica about their planning application. As a landowner outside Fordham through whose property Sunnica would wish to put the power cables from their site to Burwell, should they get planning permission, I have received several letters from them over the last two years. These have been marked by a deliberate withholding of information. The initial communications, demanding access to survey my land, one even including a contract for me to sign, contained no explanation of who Sunnica were, or why they wished to have access to the land. I had to contact Sunnica to discover this information. All their letters have been, and continue to be, couched in high-handed, even intimidating and threatening, terms. Their proposal is one I could not object to more strongly.

I understand that I can register as an "Interested Party" after they have submitted their application. I would very much appreciate it if you could tell me how I go about this.

I am happy for my views to be shared with the Planning Inspectorate.

Yours sincerely

Harry Sidebottom

From: [anne](#)
To: [Andrew Phillips](#)
Subject: [EXTERNAL] Sunnica
Date: 04 November 2021 09:19:08

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Dear Andrew

I am writing to express my concern over the lack of consultation regarding the Sunnica scheme.

The webinars were fine but village were unable to access them. Asking questions via chat facilities is also not satisfactory.

The booklet had many omissions and several points of access etc seem to have been changed quite recently, with little or no consultation.

Since restrictions ended there has been time for Sunnica te to face meetings as Lucy Fraser and Matt Hancock did.

Please xpressed to the planning Inspector

thank you

anne noble

--



Anne Noble

Tel: +44 (0)1638 780 259
Mob: +44 (0)7880 738 076

www.demetertech.com

From: [Nick Wright](#)
To: [Andrew Phillips](#)
Subject: [EXTERNAL] FW: Adequacy of Consultation - SUNNICA Industrial Solar Scheme
Date: 04 November 2021 08:42:42
Attachments: [image746775.png](#)
[image585694.png](#)
[image036017.png](#)
[image996980.png](#)
[image443539.png](#)
[image095595.png](#)
[image223378.png](#)
[image717428.png](#)
[Scan_compressed.pdf](#)

Caution: External email. Do not click links or open attachments unless you recognise the sender and know the content is safe. The original sender of this email is Nick Wright <n.wright@dowsongroup.com>

Badlingham Farm
Chippenham
Cambs
CB7 5QQ

4TH November 2021

Dear Mr Phillips

Adequacy of Consultation – Sunnica

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

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

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

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

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

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

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

5/ Sunnica have refused to give details of the electricity trading business they intend to enter

into using the BESS they are proposing. They have refused to tell us how much electricity will be lost when it is taken from the grid and sent up to 15 miles to be stored in BESS.

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

7/ Sunnica have provided misleading information on the following ;

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

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

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

8/ Sunnica have been disingenuous in the use of the Rochdale Envelope principle. This format should be used to give sufficient information to enable the likely effects on the environment to be assessed. This is clearly not how Sunnica have used the principle. They have quoted the principle to avoid answering questions but have never employed it when assessing the scheme. This was apparent in all the webinars and throughout the whole consultation. The Rochdale principle is not an excuse for developers to give inadequate descriptions of their project which is exactly how Sunnica have used it.

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

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

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

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

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

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

16/ At no point during the advertising of the Sunnica Scheme do they refer to the huge scale of the scheme. They talk about a Solar Farm not mentioning its scale. This is misleading. As Sunnica is the largest scheme ever proposed in the UK mention of its size is vital for people to understand. **shared at an early enough stage so that the proposal can still be influenced, while being sufficiently developed to provide some detail on what is being proposed: and**

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

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

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

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

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

As demonstrated by the above we were not provided with sufficient information or allowed an open dialogue with Sunnica. We have not been consulted adequately. We do not have enough genuine information about the scheme to allow us to make an informed opinion. We have to make many assumptions. For a scheme that it appears will have such a detrimental effect on the area this is not acceptable. PINS should ask Sunnica to reconsult with the local communities and Councils and be honest and open about what they intend to do and how they intend to do it.

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

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

Regards

Nick Wright

Nick Wright

Director



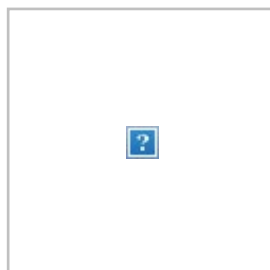
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From: [Nikki Farr](#)
To: [Andrew Phillips](#)
Subject: [EXTERNAL] Proposed Sunnica Solar Farm East Cambridgeshire
Date: 03 November 2021 12:17:05

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Dear Sirs

Please direct our email to the responsible department and ensure that our views will be shared with the Planning Inspectorate – thank you.

We object to this planned Solar Farm for so many reasons. Firstly, it is way too big – it won't just be a Solar Farm it will be a Power Plant covering all our local green fields. This is a rural area, as you know, and it will be devastating for all of us to lose such rich and diverse farmland. We will be looking out on an industrial landscape, it will change the area forever with all the panels, batteries, fencing, noise and light pollution.

It would appear that Sunnica is an inefficient, opportunistic, 'hotch potch' design with panels littering our countryside on four sites with over 15 miles of pipelines crossing roads, rivers, streams, pathways, public rights of way and hedgerows. The land that has been proposed is good, valuable farmland producing high yielding crops. To improve our environment there is a need to reduce the carbon miles our food travels and improve our food security as the global population continues to grow. Using good farmland for this project seems such a complete waste.

This scheme will destroy all the wildlife corridors and nesting and feeding habitats, which once they are gone will not easily be recovered. The screening of trees and shrubs Sunnica have committed to will take years to grow to a height which will obscure the 2.5m panels. They will take much longer for them to grow to a height to screen the Battery Energy Storage Systems. I do not believe that the wildlife will recover and return.

The construction of this site will create chaos through the estimated two years it will take to complete. We all know projects on this scale always overrun so it potentially means chaos for much longer. With the constant flow of construction traffic, HGVs, abnormal loads and staff vehicles creating noise and traffic through our villages. There will be many road closures, diversions and muddy, dangerous conditions. There will be a negative effect on our mental health as well as the pollution created which will have an impact on old and young alike, especially those with lung conditions such as COPD and asthma, this has the potential of being lethal.

It would also seem that Sunnica have shown a negative balance in their last set of accounts. This is extremely worrying, a company with this financial standing working on a Nationally Significant Infrastructure Project involving hundred of millions of pounds. It is important that there is a provision to clear the site should the scheme become bankrupt during its planned 40 year life and then once it's life is complete. This scheme will not supply sustainable energy to us local housing, it will be sold for profit to the large corporations and the National Grid. The energy will be exported from the grid at cheap, off peak times and sold back at peak times, using the battery storage to generate huge profits from energy trading. This isn't 'Green Energy', this is profiteering. There really is no benefit for the local economy or community, it is not anticipated to create any long term local jobs, instead the local farming community will lose jobs.

On top of all this our property values will fall. It has been estimated by local estate agents our

property values will fall by anywhere between 10 – 20%. This is due to the negative impact of such a project going ahead on our doorstep. Not just the reasons outlined above but the dangerous technology they are proposing to use. The Lithium-ion Batteries used in the three Battery Energy Storage Systems are potentially dangerous, and have been banned in some States in the USA. They pose an 'unacceptable risks', due to having caused uncontrollable fires, the fumes omitted being toxic and extremely hazardous to human life. Who wants to live near those?

We are all in favour of 'green energy' and believe there must be better ways to achieve this. Solar Panels on all new builds, on large supermarkets and shopping centres, on car parks. Solar Farms built on useless land ie. old quarry sites, airfields, unused industrial land, landfill sites etc. It appears that Sunnica are using the Covid 19 pandemic to avoid having meaningful 'face to face' consultations in our villages. Indeed, our village (Isleham) was not even originally included in their proposals so allowing them not to have contact with us locals and the community. It seems clear that in the aftermath of the Non-Statutory Consultation, they did not acknowledge or act on the concerns raised by the local population who were consulted. We cannot let this happen again. This is the last time that we will be able to have a say on the project so please, please help our communities and stop this happening to our beautiful, rural villages.

Thank you for taking the time to read my email and we hope you are able to support us with our objections to this impractical and destructive proposal by Sunnica.

Yours sincerely

Andrew & Nicola Farr

14 East Fen Road

Isleham

Ely CB7 5SW

From: [Barrow, Julie](#)
To: [Hempstead, Louise](#); [Hall, Marianna](#); [Murray, Amy](#)
Cc: [Burlow, Alexa](#); [Gross, Victoria](#)
Subject: FW: adequacy of consultation/to be shared with the planning inspectorate
Date: 01 December 2021 11:21:54
Importance: High

From: [REDACTED]
Sent: 01 December 2021 09:59
To: Barrow, Julie <Julie.barrow@westsuffolk.gov.uk>
Subject: adequacy of consultation/to be shared with the planning inspectorate

[THIS IS AN EXTERNAL EMAIL]

Dear Julie,

Further to my participating in the Say no to Sunnica A of C response, I would like to write as an individual to comment on the extraordinary way in which sunnica have been 'unavailable' to us all. On webinars they never answered a direct question and there was no facility to do so. I attended a meeting with two of the representatives from Sunnica at Snailwell church, they not only gave us next to no information but again appeared unable or unwilling to discuss the questions very politely asked of them.

For the Sunnica action group, I have participated in some of the leafletting/information gathering and have been met constantly with an overwhelming answer of 'lack of information' and in most cases a complete unawareness of this scheme. Please help us the represent this view to the inspectorate, there has categorically been NO adequate consultation on this issue, however low the bar.

Many thanks and regards,
Katherine Stewart

Katherine Stewart
The Manor House
Freckenham
Bury St Edmunds
Suffolk IP28 8JF

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