



SUNNICA ENERGY FARM

Preliminary Environmental Information Report

Chapter 1: Introduction

Sunnica Ltd

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Quality information

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Glossary

General

Applicant	Sunnica Limited
Application	The proposed application for a DCO to be submitted by the Applicant
Battery Energy Storage System (BESS)	Proposed development of a battery storage installation and associated development to allow for the storage, importation and exportation of energy to the National Grid.
Burwell National Grid Substation	The grid connection location for the Scheme, which is known as Burwell National Grid Substation and located at Weirs Drove in Burwell.
Grid Connection Route A	The route of the cable connection between Sunnica East A to Sunnica West A.
Grid Connection Route B	The route of the cable connection from Sunnica West to the Burwell National Grid Substation.
Ground mounted solar PV panel arrays	These are the structures that are fixed to the ground and onto which the solar PV modules are attached.
Proposed DCO boundary	The land potentially required temporarily and/or permanently for the construction, operation and maintenance of the Scheme.
Scheme	A nationally significant infrastructure project comprising: 1. a Solar Farm and potentially a BESS at Sunnica East A and B; 2. a Solar Farm and potentially a BESS at Sunnica West A and B; 3. Grid Connection A; and 4. Grid Connection B. The Scheme will be known as "Sunnica Energy Farm".
Sites	Sunnica West A and B and Sunnica East A and B
Solar Farm	Proposed generating station comprised of solar PV modules mounted on racks and connected via associated infrastructure to the national grid.
Sunnica East A	Land that forms part of Sunnica East located south of Isleham in Cambridgeshire and Suffolk.
Sunnica East B	Land that forms part of Sunnica East located between Worlington and Freckenham in Suffolk.
Sunnica Energy Farm	The Scheme. A nationally significant infrastructure project comprising: 1. a Solar Farm and potentially a BESS at Sunnica East; 2. a Solar Farm and potentially a BESS at Sunnica West; 3. Grid Connection A; and 4. Grid Connection B
Sunnica West A	The land that forms part of Sunnica West located within the southern fields of the Chippenham Park Estate bordering the A11 and A14 corridor.
Sunnica West B	The land that forms part of Sunnica West located to the east of Snailwell within the Chippenham Park Estate.

Project description terminology

Cable corridor	Approximately 100m wide corridor within which the cable route would be located
Cable route	The working width, which would contain the buried export cables as well as the temporary running track, topsoil storage and excavated material during construction. To include the

	area required for all the equipment and cable route needed around the jointing pit during the construction process.
Interface cables	Buried high-voltage cables linking the on-site substations to the Burwell National Grid substation.
Inverter	Inverters convert the direct current (DC) electricity collected by the PV modules into alternating current (AC), which allows the electricity generated to be exported to the National Grid. BESS also use inverters to convert between DC and AC. The batteries function in DC and electricity must be converted to AC to pass into or from the grid.
Jointing pit	Underground structures constructed at regular intervals along the cable route to join sections of cable and facilitate installation of the cables into the buried ducts.
Link boxes	Underground chambers or above ground cabinets next to the cable route housing low voltage electrical earthing links.
National Grid substation extension	The proposed location for the National Grid substation extension.
On-site cables	The cables, which transmit electricity from the transformers to the onshore project substation.
On-site substation	A compound containing electrical equipment to enable connection to the national grid. We are currently thinking that the system would be HVAC (high voltage alternating current) at 132kV but this needs research to be final decision.
Transformers	Transformers control the voltage of the electricity generated across the site before it reaches the On-site substations.

Acoustic Terminology

Noise	Unwanted or unexpected sound.
Frequency (Hz)	The number of cycles per second (i.e., the number of vibrations that occur in one second); subjectively this is perceived as pitch.
Frequency Spectrum	The relative frequency contributions that make up a noise.
“A” Weighting (dB(A))	The human ear does not respond uniformly across the audible frequency range. The “A” weighting is commonly used to simulate the frequency response of the ear.
Decibel (dB)	The decibel is a logarithmic ratio of two values of a variable. The range of audible sound pressures is approximately 2×10^{-5} Pa to 200 Pa. Using decibel notation presents this range in a more manageable form, 0 dB to 140 dB.
Sound Pressure Level (L_p)	Equal to 20 times the logarithm to the base 10 of the ratio of the root mean squared (RMS) sound pressure to the reference sound pressure. In air the reference sound pressure is 2×10^{-5} Pa. Mathematically: $\text{Sound Pressure Level (dB)} = 20 \log_{10} \{p(t) / P_0\}$ Where $P_0 = 2 \times 10^{-5}$ Pa
Ambient Noise Level, $L_{Aeq,T}$	The equivalent continuous A-weighted sound pressure level of the totally encompassing sound in a given situation at a given time that is usually composed of sound from many sources near and far.
Background Noise Level $L_{A90,T}$	The A-weighted sound pressure level of the residual noise at the assessment position that is exceeded for 90% of a given time interval, T, measured using the fast time weighting, F, and quoted to the nearest whole number.
Reference Time Interval, T_r	The specified interval over which an equivalent continuous A-weighted sound pressure level is determined.

Specific Noise Level, $L_{Aeq,Tr}$	The equivalent continuous A-weighted sound pressure level at the assessment position produced by the specific noise source over a given reference time interval.
Rating Level, $L_{Ar,Tr}$	The specific noise level plus any adjustment for any characteristic features of the noise.
Level $L_{A10,T}$	The A-weighted sound pressure level exceeded for 10% of a given time interval, T, measured using the fast time weighting, F.

List of Abbreviations and Acronyms

<i>Term</i>	<i>Meaning</i>
AC	Alternating current
ALC	Agricultural Land Classification
AONB	Area of Outstanding Natural Beauty
ASA	Alternative Sites Assessment
BPM	Best Practicable Means
CCC	Cambridgeshire County Council
CEMP	Construction Environmental Management Plan
CIEEM	Chartered Institute of Ecology and Environmental Management
CLR	Contaminated Land Report
CRMP	Construction Resource Management Plan
CSM	Conceptual Site Model
CTMP	Construction Traffic Management Plan
CWS	County Wildlife Site
DAS	Design and Access Statement
DBEIS	Department for Business, Energy and Industrial Strategy
DC	Direct current
DCO	Development Consent Order
ECDC	East Cambridgeshire District Council
EIA	Environmental Impact Assessment
ES	Environmental Statement
DEFRA	Department for Environment, Food and Rural Affairs
FHDC	Forest Heath District Council
GRP	Glass reinforced plastic
HER	Historic Environment Record
HGV	Heavy Goods Vehicle
HSC	Hazardous Substances Consent
HSE	Health and Safety Executive
IEMA	Institute of Environmental Management and Assessment
LiDAR	Light Detection And Ranging
LOAEL	Lowest Observable Adverse Effect Level
MHCLG	Ministry of Housing, Communities and Local Government
MOD	Ministry of Defence
Non-motorised Users (NMUs)	Pedestrians, cyclists, equestrians.
NNR	National Nature Reserve
NOEL	No Observed Effect Level
NPPF	National Planning Policy Framework 2018
NPS	National Policy Statement. National Policy Statements are produced by government. They comprise the government's central policy documents for the development of nationally significant infrastructure.
NSIP	Nationally Significant Infrastructure Project
NTS	Non-Technical Summary
PEI	Preliminary Environmental Information
PERA	Preliminary Environmental Risk Assessment
PHE	Public Health England

POC	Point of Connection
PPE	Personal Protective Equipment
PRoW	Public Right of Way
RPG	Registered Park and Garden
SAC	Special Area of Conservation
SCC	Suffolk County Council
SEBC	St Edmundsbury Borough Council
SOCC	Statement of Community Consultation
SOAEL	Significant Observed Adverse Effect Level
SoS	Secretary of State
SPA	Special Protection Area
SPZ	Source Protection Zone
SSSI	Site of Special Scientific Interest
TPO	Tree Preservation Order
UK	United Kingdom
WFD	Water Framework Directive
WSC	West Suffolk Council

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1. Introduction

1.1 Background

- 1.1.1 Sunnica Ltd (hereafter referred to as the 'Applicant') has commissioned this Preliminary Environmental Information ('PEI') Report in relation to an application for a Development Consent Order ('DCO') for the construction, operation and decommissioning of the Sunnica Energy Farm (hereafter referred to as the 'Scheme'). The application for the DCO will be submitted to the Planning Inspectorate, with the decision whether to grant a DCO being made by the Secretary of State for Business, Energy and Industrial Strategy (hereafter referred to as the 'Secretary of State') pursuant to the Planning Act 2008 (Ref 1-1).
- 1.1.2 A DCO would provide the necessary authorisations and consents for the construction, operation (which includes maintenance) and decommissioning of the Scheme across four proposed sites, and associated infrastructure for interconnection between the sites and connection to the national grid, including an extension to the Burwell National Grid Substation.
- 1.1.3 The Scheme is considered to be 'EIA development' as defined by the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the 'EIA Regulations') (Ref 1-2), requiring an Environmental Impact Assessment ('EIA'). Under Regulation 12 of the EIA Regulations, the Applicant is required to set out in its Statement of Community Consultation ('SOCC') how it intends to publicise and consult on preliminary environmental information relating to the Scheme. Regulation 12 states that the purpose of the PEI Report (as referred to in Regulation 12(2) of the EIA Regulations) is to provide sufficient information to enable stakeholders to develop an informed view of the likely significant effects of the development (and of any associated development). Advice Note 7 from the Planning Inspectorate (Section 8) explains that the PEI does not need to constitute a complete assessment and is a compilation of the environmental information available at the point in time the PEI Report has been produced.
- 1.1.4 This PEI Report therefore presents the preliminary findings of the EIA undertaken for the Scheme for the purposes of statutory consultation in accordance with the Planning Act 2008.
- 1.1.5 This chapter is supported by the following figures in Volume 3:
- Figure 1-1: Scheme Location.
 - Figure 1-2: Sunnica East A and B – Including Grid Connection A.
 - Figure 1-3: Sunnica West Sites A and B – Including Grid Connection.

1.2 The Scheme

- 1.2.1 The Scheme comprises the construction, operation (including maintenance) and decommissioning of ground mounted solar photovoltaic (PV) panel arrays and a Battery Energy Storage System (BESS). Subject to obtaining the necessary consents, construction is anticipated to commence in Autumn / Winter 2022 and to be completed ready for operation in Spring 2025, with decommissioning in 2065.

- 1.2.2 The Scheme is situated across four sites: Sunnica East Site A, Sunnica East Site B, Sunnica West Site A and Sunnica West Site B (the 'Sites'), together with a cable route corridor (including interconnection between the Sites), and extension to the Burwell National Grid Substation (refer to Figure 1-1).
- 1.2.3 The Sunnica East Site A is located approximately 3.5 kilometres (km) east of Mildenhall, 0.5km south-east of Isleham and 0.6km south-west of West Row. Sunnica East Site B is located approximately 1.5km south-east of Mildenhall, 1km east of Freckenham and immediately south of Worlington.
- 1.2.4 The Sunnica West Site A is located approximately 7km to the east of Burwell, immediately north of the A14 at Newmarket. Sunnica West Site B is located approximately 5.5km to the east of Burwell and 0.5km north of Snailwell.
- 1.2.5 The cable route corridor for 'Grid Connection Route A' is located between Sunnica East Site A and Sunnica East Site B and then between Sunnica East Site B to Sunnica West Site A, and 'Grid Connection Route B' is located between Sunnica West Site A to Sunnica West Site B and then from Sunnica West B to Burwell National Grid Substation Extension.
- 1.2.6 The Sunnica East Site A, Sunnica East Site B, Sunnica West Site A and Sunnica West Site B are approximately 222.4 hectares (ha), 322.7ha, 459.8ha and 68.8ha, respectively.
- 1.2.7 Grid Connection Route A is approximately 7km in length with a 100m wide corridor. Grid Connection Route B is approximately 13km in length with a 100m wide corridor. The final easement for the electrical connection will be smaller than 100m, but the selected corridor width will allow micro-siting at the detailed design stage. This approach provides flexibility to the Applicant at this stage whilst providing some certainty to affected landowners.
- 1.2.8 The location of the Scheme is shown in Figure 1-1. The land within the Scheme Boundary and its surroundings and the Scheme are described in **Chapter 2: Scheme Location**.
- 1.2.9 The Sunnica East Site A, Sunnica East B, Sunnica West Site A and Sunnica West Site B, together with Grid Connection Route A and Grid Connection Route B, and the extension to the Burwell National Grid Substation are shown on Figure 1-2 and Figure 1-3 and described in **Chapter 3: Scheme Description**, of this PEI Report, with alternatives described in **Chapter 4: Alternatives and Design Evolution**. The land shown within the Scheme Boundary on Figure 1-2 and Figure 1-3 is referred to as the 'DCO Site' in this PEI Report.
- 1.2.10 The Scheme would provide vital new energy infrastructure required to ensure security of supply to the UK, supporting the Department for Business, Energy and Industrial Strategy (DBEIS) (Ref 1-3) for responsible energy generation that provides a more sustainable, low carbon economy. Solar power provides an important role in moving the UK away from its reliance on fossil fuels. The Scheme will therefore be compliant with the Overarching National Policy Statement for Energy (EN-1) and the National Policy Statement for Renewable Energy Infrastructure (EN-3) which seek to deliver security of electricity supply.

- 1.2.11 Environmental impacts arising from the Scheme have been studied systematically as part of the EIA process, and the initial results are presented within this PEI Report. The baseline for the assessment has been derived from surveys and studies within and around the DCO Site. This is explained further in **Chapter 5: EIA Methodology**, and in the methodology section of each technical assessment chapter.
- 1.2.12 The ongoing EIA process is considering impacts resulting from the construction, operation (including maintenance) and decommissioning of the Scheme, and considers measures to avoid, reduce or mitigate any significant adverse effects on the environment and where possible, enhance the environment. It also identifies ‘residual’ impacts, defined as impacts remaining following the implementation of mitigation measures.
- 1.2.13 The structure of the rest of this PEI Report (i.e. beyond Chapter 5) is outlined in Table 1-1 below.

Table 1-1 PEI Report Structure

<i>Volume</i>	<i>Chapter</i>	<i>Description</i>
Volume 1	Chapter 6: Climate Change Chapter 7: Cultural Heritage Chapter 8: Ecology Chapter 9: Flood Risk, Drainage and Water Resources Chapter 10: Landscape and Visual Amenity; Chapter 11: Noise and Vibration Chapter 12: Socio-Economics and Land Use Chapter 13: Transport and Access Chapter 14: Air Quality Chapter 15: Human Health Chapter 16: Other Environmental Topics	The PEI Report considers the environmental effects associated with a number of identified topics, which may result in significant environmental effects. Each topic is presented in a separate technical chapter and details the results of the environmental assessment, likely significant effects arising from the Scheme, and the proposed mitigation measures. Each chapter also presents the potential cumulative effects resulting from other past, present or reasonably foreseeable projects together (i.e. cumulatively) with the Scheme. Chapter 16: Other Environmental Topics includes consideration of glint and glare, major accidents and disasters, ground conditions, telecommunications, television reception, utilities, and waste.
	Chapter 17: Effect Interactions	The effect iterations that lead to combined effects on sensitive receptors will be documented within this Chapter.
	Chapter 18: Summary of Environmental Effects	A brief summary of the PEI Report outlining the residual significant effects remaining following the implementation of mitigation.
Volume 2	Technical Appendices	A set of appendices is provided for reference. These comprise background data, technical reports, tables, figures and surveys which support the assessments in this PEI Report.

<i>Volume</i>	<i>Chapter</i>	<i>Description</i>
Volume 3	Figures	A set of figures is provided to accompany Volume 1 to aid the readers understanding.
N/A	Non-Technical Summary (NTS)	The NTS is presented in a separate document to provide a concise description of the Scheme, the considered alternatives, baseline, assessment methodology, potential environmental effects and mitigation measures. The NTS is designed to provide information on the Scheme in an accessible format using non-technical language which can be understood by a wide audience and to assist interested parties with their familiarisation of the Scheme.

1.3 Legislative and Planning Policy Context

Consenting Process

- 1.3.1 The Scheme is defined as a Nationally Significant Infrastructure Project ('NSIP') under Sections 14(1)(a) and 15(2) of the Planning Act 2008 (Ref 1-1) as an onshore generating station in England exceeding 50 megawatts (MW).
- 1.3.2 The Planning Act 2008 provides that the Secretary of State is responsible for determining the application for development consent, with the power to appoint the Planning Inspectorate to manage and examine the application. In its role, the Planning Inspectorate will examine the application for the Scheme and make a recommendation to the Secretary of State who will then decide whether to grant a DCO.
- 1.3.3 In accordance with Section 104(2) of the Planning Act 2008 (Ref 1-1), the Secretary of State is required to have regard to the relevant National Policy Statement ('NPS'), amongst other matters, when deciding whether or not to grant a DCO. However, the Scheme's proposed energy generating technology is not specifically referenced by an NPS and therefore the DCO will be determined in accordance with Section 105 of the Planning Act 2008 (Ref 1-1).
- 1.3.4 Section 105(2) of the Planning Act 2008 (Ref 1-1) provides the basis for deciding the DCO application and the Secretary of State must have regard to the provisions set out in this section of the Planning Act 2008. This includes any matters which the Secretary of State thinks are both important and relevant to its decision
- 1.3.5 A DCO, if granted, has the effect of providing consent for development, in addition to a range of other consents and authorisations, where specified, as well as removing the need for some consents (such as planning permission). Section 115 of the Planning Act 2008 (Ref 1-1) also states that a DCO can include consent for 'associated development', which is development that is not an NSIP in its own right, but is associated with, the NSIP. This may be

development that supports the construction, operation or decommissioning of the NSIP; which helps to address the impacts of the NSIP; or is of a type normally brought forward with the NSIP.

EIA Regulations

- 1.3.6 The EIA Regulations specify which developments are required to undergo EIA and schemes relevant to the NSIP planning process are listed under either of 'Schedule 1' or 'Schedule 2'. Those developments listed in Schedule 1 must be subject to EIA, while developments listed in 'Schedule 2' must only be subjected to EIA if they are considered "*likely to have significant effects on the environment by virtue of factors such as its nature, size or location*". The criteria on which this judgement must be made are set out in Schedule 3. The Scheme is a 'Schedule 2' development under Paragraph 3(a) of Schedule 2 of the EIA Regulations as it constitutes '*Industrial installations for the production of electricity, steam and hot water*'.
- 1.3.7 The Applicant has confirmed to the Planning Inspectorate under Regulation 8(1)(b) of the EIA Regulations that an Environmental Statement (ES) will be provided with the DCO application for the Scheme (as required by Regulation 5(2)(a) of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 ('APFP Regulations') (Ref 1-5)), as it is considered there is the potential for the Scheme to meet the criteria set out in Schedule 3 of the EIA Regulations.
- 1.3.8 The issues that the Applicant considers the EIA will need to address were identified in the EIA Scoping Report submitted to the Planning Inspectorate on 13 March 2019 (***PEI Report Volume 2: Appendix 1A***). The EIA Scoping Report was developed following initial consultation with a number of statutory consultees and was informed by the EIA team's experience working on a number of other solar farm projects. The Planning Inspectorate reviewed and consulted on the EIA Scoping Report and published a Scoping Opinion on 23 April 2019 (the Scoping Opinion) which included the formal responses received by the Planning Inspectorate from consultees (***PEI Report Volume 2: Appendix 1B***). Key issues raised in the Scoping Opinion are summarised at the start of each technical chapter of the PEI Report and in ***PEI Report Volume 2: Appendix 1C***). All issues are being considered during the EIA process.

National Policy Statements

- 1.3.9 The Scheme's proposed energy generating technology is not currently specifically referenced by a National Policy Statement (NPS) and therefore the DCO will be determined in accordance with Section 105 of the Planning Act 2008 (Ref 1-1).
- 1.3.10 In lieu of a technology specific NPS, the EIA takes account of the following NPSs, which are considered to be matters that will be important and relevant to the Secretary of State's decision as to whether to grant a DCO for the Scheme:
- Overarching National Policy Statement for Energy (EN1) (Ref 1-6),
 - National Policy Statement for Renewable Energy Infrastructure (EN-3) (Ref 1-7), and

- National Policy Statement for Electricity Networks Infrastructure (EN-5) (Ref 1-8).

1.3.11 A summary of the relevant considerations for each technical assessment is provided for each environmental topic (Chapters 6 to 14 of this PEI Report).

National Planning Policy Framework

1.3.12 The National Planning Policy Framework (Ref 1-9) (NPPF) sets out the Government's planning policies for England and how these are to be applied. It is a material consideration in planning decisions. Paragraph 5 of the NPPF makes it clear that the document does not contain specific policies for NSIPs and that applications in relation to NSIPs are to be determined in accordance with the decision making framework set out in the Planning Act 2008 (Ref 1-1) and relevant NPSs, as well as any other matters that are considered both important and relevant. However, Paragraph 5 goes on to confirm that the NPPF may be a matter that is both important and relevant for the purposes of assessing DCO applications. The EIA for the Scheme therefore has regard to the relevant policies of the NPPF as part of the overall framework of national policy.

Local Planning Policy

1.3.13 Policies in Local Plans are frequently considered 'important' and 'relevant' matters and can influence the content of local impact reports (which the host local authorities will produce following submission of the application for the DCO) which the Secretary of State must have regard to in its decision making in accordance with Section 105(2) of the Planning Act 2008.

1.3.14 The Scheme lies within the administrative areas of two county councils, Suffolk County Council (SCC) and Cambridgeshire County Council (CCC), and two district councils, West Suffolk Council¹ (WSC) and East Cambridgeshire District Council (ECDC).

1.3.15 The local planning policy relevant to the Scheme consists of the following:

West Suffolk Council

- Forest Heath District Council Core Strategy Adopted 2010 (Ref 1-10);
- Forest Heath and St Edmundsbury Local Plan: Joint Development Management Policies Document (last updated February 2015) (Ref 1-11);
- Forest Heath Area of West Suffolk Council Site Allocations Local Plan (SALP) September 2019 (Ref 1-12);
- Forest Heath Local Plan Policies Map February 2015 (Ref 1-13); and
- Newmarket Neighbourhood Plan (made February 2020) (Ref 1-21).

Suffolk County Council

- Suffolk Minerals and Waste Local Plan (adopted July 2020) (Ref 1-14).

¹ On 1 April 2019, Forest Heath District Council merged with St Edmundsbury District Council to form West Suffolk Council.

East Cambridgeshire District Council

- East Cambridgeshire District Council Local Plan Adopted April 2015 (Ref 1-15);
- Fordham Neighbourhood Plan made in December 2018 (Ref 1-16)
- East Cambridgeshire District Council Supplementary Planning Document (SPD) Renewable Energy Development (Commercial Scale) October 2014 (Ref 1-17);
- East Cambridgeshire District Council Contaminated Land SPD (adopted 2015); and
- East Cambridgeshire District Council Wildlife Sites SPD (adopted 2010).

Cambridgeshire County Council

- Cambridgeshire and Peterborough Minerals and Waste Development Strategy (2011) (Ref 1-18);
- Cambridgeshire and Peterborough Minerals and Waste Site Specific Proposals Development Plan Document (2012) (Ref 1-19); and
- Cambridgeshire and Peterborough Minerals and Waste Local Plan (Proposed Submission- November 2019) (Ref 1-20).

- 1.3.16 WSC is currently preparing a new Local Plan to be adopted mid-2023. Until then, the adopted Local Plans covering the former St Edmundsbury and Forest Heath areas will continue to apply to those parts of the WSC area. The adopted Local Plan for West Suffolk includes documents previously referred to as the Local Development Framework for Forest Heath District Council (FHDC) and St Edmundsbury Borough Council (SEBC), listed above.
- 1.3.17 ECDC is also currently preparing a review of its Local Plan following the withdrawal of its emerging plan in February 2019. In October 2019, the Council undertook its first 'review' of its Local Plan 2015, and determined at that stage that, following that review, that a new Local Plan would not be drafted. However, the Council also committed to monitoring the situation. Accordingly, and with the Plan hitting its 5th Anniversary on 21 April 2020, a further review has been undertaken, as set out in the East Cambridgeshire Local Plan Second Review. The main changes to be prepared, identified from this second review, is the need to update the Local Housing Needs and the housing requirement figures in the East Cambridgeshire Local Plan in order to plan for the community's housing needs in the future long-term.
- 1.3.18 Within the ECDC there are eight neighbourhood areas including: Sutton, Bottisham, Witchford, Fordham, Cheveley, Swaffham, Reach and Isleham. Two Neighbourhood Plans have been adopted: Fordham Neighbourhood Plan and Sutton Neighbourhood Plan in May 2019. Given the Scheme's cable route passes through the Fordham Neighbourhood Plan Area the plan's policies have been considered where relevant.
- 1.3.19 Within the WSC area there are seven neighbourhood areas including: Barningham, Exing, Freckenham, Great Barton, Hargrave, Ixworth and Ixworth Thorpe and Newmarket. Currently, the Hargrave Neighbourhood Plan and Newmarket Neighbourhood Plan have been adopted. Given the

Scheme's proximity to Newmarket and the Newmarket Neighbourhood Plan Area, the plan's policies have been considered where relevant.

Consideration of Planning Policy in EIA

- 1.3.20 The PEI Report describes the national and local planning policies relevant to the assessment with a summary provided for each environmental topic. The PEI Report does not assess the Scheme against planning policy, which will be undertaken and set out in the Planning Statement. The Planning Statement will be a separate document that will be submitted as part of the DCO application.
- 1.3.21 The purpose of considering the planning policy in the EIA is twofold:
- a. To identify policy that could influence the sensitivity of receptors (and therefore the significance of effects) and any requirements for mitigation; and
 - b. To identify planning policy that could influence the methodology of the EIA. For example, a planning policy may require the assessment of an impact or the use of a specific methodology.
- 1.3.22 A summary of national and local planning policy relevant to each technical assessment is provided within the relevant chapters for each environmental topic.

1.4 Consultation

- 1.4.1 Consultation is integral to the preparation of DCO applications and to the EIA process. The views of consultation bodies and the local community serve to focus the environmental studies and to identify specific issues that require further investigation, as well as to inform aspects of the design of the Scheme. Consultation is an on-going process and the publication of this PEI Report forms an important part of that process.
- 1.4.2 The Planning Act 2008 (Ref 1-1) requires applicants for DCOs to carry out formal (statutory) pre-application consultation on their proposals. There are several requirements as to how this consultation must be undertaken that are set out in the Planning Act 2008 (Ref 1-1) and related regulations:
- Section 42 requires the applicant to consult with 'prescribed persons', which includes certain consultation bodies such as the Environment Agency and Natural England, relevant statutory undertakers, relevant local authorities, those with an interest in the land, as well as those who may be affected by the Scheme;
 - Section 47 requires the applicant to consult with the local community on the development. Prior to this, the applicant must agree a Statement of Community Consultation (SoCC) with the relevant local authorities. The SoCC must set out the proposed community consultation and, once agreed with the relevant local authorities, a SoCC Notice must be published in local newspapers circulating within the vicinity of the land in question. The consultation must then be carried out in accordance with the final SoCC;
 - Section 48 places a duty on the applicant to publicise the proposed application in the 'prescribed manner' in a national newspaper, The

London Gazette, local newspapers circulating within the vicinity of the land and, where relevant, certain marine publications; and

- Section 49 places a duty on the applicant to take account of any relevant responses received to the consultation and publicity that is required by Sections 42, 47 and 48.

1.4.3 The Applicant is adopting a two-stage approach to pre-application consultation on the Scheme. An informal, non-statutory consultation was carried out during June / July 2019, and statutory consultation will commence at the same time as the publication of this PEI Report.

1.4.4 The issues that have been raised through consultation and how these have been considered and addressed within the design evolution of the Scheme and the EIA will be set out in the ES.

1.4.5 The pre-application consultation undertaken by the Applicant will also be documented within the Consultation Report that will form part of the DCO application. This will include a separate section on EIA related consultation as recommended within the Planning Inspectorate Advice Note (Advice Note 14: Compiling the Consultation Report (Ref 1-23)) on the preparation of consultation reports.

1.5 IEMA Quality Mark

1.5.1 AECOM is an Institute of Environmental Management and Assessment (IEMA) Registered Impact Assessor and holds the IEMA EIA Quality Mark as recognition of the quality of our EIA product and continuous training of our environmental consultants. A Statement of Competence will be included within the ES, outlining the relevant expertise or qualifications of the experts who prepared the ES.



Purpose of the PEI Report

- 1.5.2 This PEI Report has been prepared to satisfy the requirement of the EIA Regulations (Ref 1-2) as discussed above. ‘Preliminary environmental information’ is defined in the EIA Regulations as information *“which (a) has been compiled by the applicant; and (b) is reasonably required for the consultation bodies to develop an informed view of the likely significant environmental effects of the development (and of any associated development)”*.
- 1.5.3 Planning Inspectorate Advice Note 7 (EIA: Process, Preliminary Environmental Information, and Environmental Statements) (Ref 1-22) notes: *“A good PEI document is one that enables consultees (both specialist and non-specialist) to understand the likely environmental effects of the Scheme and helps to inform their consultation responses on the Scheme”*.
- 1.5.4 In order to enable consultees to understand the likely environmental effects of the Scheme, this PEI Report presents preliminary findings of the environmental assessments undertaken to date. This allows consultees the opportunity to provide informed comments on the Scheme, the assessment process and preliminary findings prior to the finalisation of the DCO application and the ES. The Applicant is seeking the views of consultees on the information contained within this report, and there is opportunity within the process up to submission of the DCO application for both the EIA and the project design to have regard to comments received.
- 1.5.5 It should be noted that this PEI Report does not constitute a full ES, but rather presents the assessments completed as part of the EIA process to date. The various assessments are at differing stages of completion; however, it is considered that the information presented is sufficient to enable consultees to develop an informed view of the Scheme. Following statutory consultation on the preliminary environmental information, and once the design is further developed, this PEI Report will be developed into a final ES taking into consideration comments raised during the consultation. The ES will be submitted as part of the suite of DCO application materials.
- 1.5.6 The information presented in this PEI Report describes the extent of the environmental assessment work undertaken to date based upon the information available. The presentation of preliminary environmental information in this way also allows the EIA process to take account of comments received during the statutory consultation process.
- 1.5.7 Table 1-2 below summarises where the requirements of Schedule 4 of the EIA Regulations have been addressed in the PEI Report.

Table 1-2 Requirements of Part 1 of Schedule 4 of the EIA Regulations

Requirement	Location in this PEI Report
A description of the physical characteristics of the whole development and the land-use requirements during the	Chapter 2: Scheme Location Chapter 3: Scheme Description

Requirement

Location in this PEI Report

construction, operational and decommissioning phases.

A description of the main characteristics of the production processes, for instance, nature and quantity of the materials used.

Chapter 3: Scheme Description

An estimate, by type and quantity, of expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation, etc.) resulting from the operation of the Scheme.

Chapter 2: Scheme Location
Chapter 3: Scheme Description
Chapter 6: Climate Change
Chapter 9: Flood Risk, Drainage and Water Resources
Chapter 11: Noise and Vibration
Chapter 13: Transport and Access
Chapter 14: Air Quality
Chapter 15: Human Health
Chapter 16: Other Environmental Topics

An outline of the main alternatives studied by the applicant and an indication of the main reasons for the applicant's choice, taking into account the environmental effects.

Chapter 4: Alternatives and Design Evolution

A description of the aspects of the environment likely to be significantly affected by the development, including, in particular, population, fauna, flora, soil, water, air, climatic factors, material assets, including the architectural and archaeological heritage, landscape and the inter-relationship between the above factors.

Chapters 6-15 (technical assessments) Baseline Conditions sections

A description of the likely significant effects of the development on the environment, which should cover the direct effects and any indirect, secondary, cumulative, short, medium and long-term, permanent and temporary, positive and negative effects of the development, resulting from:

Chapters 6-15 (technical assessments) Likely Impacts and Effects sections

- (a) the existence of the development;
- (b) the use of natural resources;
- (c) the emission of pollutants, the creation of nuisances and the elimination of waste, and the description by the applicant of the forecasting methods used to assess the effects on the environment.

A description of the measures envisaged to prevent, reduce and where possible

Chapters 6-15 (technical assessments) Scheme Design, Impact Avoidance and

<i>Requirement</i>	<i>Location in this PEI Report</i>
offset any significant adverse effects on the environment.	Mitigation and Enhancement Measures sections
A non-technical summary of the information provided under paragraphs 1 to 5 of this Part.	Non-Technical Summary
An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information.	Chapters 6-15 (technical assessments) Limitations or Difficulties sections

1.6 References

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