

Statement of Community Consultation

September 2020

Introduction

Sunnica Ltd is inviting feedback from the local community on its proposals for Sunnica Energy Farm as part of a public consultation from 22 September to 2 December 2020.

What is this document?

This document, known as a Statement of Community Consultation (SoCC), sets out how we plan to consult with the local community. It includes:

- The planning process we must follow
- An outline of our proposals
- How we have developed our approach to consultation
- How we will be consulting the local community
- How we will publicise the consultation
- The consultation arrangements
- What we will do with feedback from the consultation

Why are we publishing this document?

The proposed Sunnica Energy Farm is classified as a Nationally Significant Infrastructure Project (NSIP) under the Planning Act 2008. This means that, unlike other forms of development, we must apply to the Secretary of State for Business, Energy and Industrial Strategy (BEIS) for a Development Consent Order (DCO) for our proposals.

Part of this process requires us to publish a statement of how we will consult with the local community – known as a Statement of Community Consultation (SoCC). We very much want feedback from the local community on our proposals and see this document as an important part of the process.

The planning process

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

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

Figure 1 on page 4 shows each stage of the planning process for NSIPs. We anticipate submitting our application in spring 2021.

The Planning Act 2008 and consultation

DCOs are governed by a fixed, statutory process which requires us to consult with persons with an interest in the proposed land and certain bodies as prescribed under section 42 of the Planning Act 2008; the local community under section 47 of the Planning Act 2008; and to publicise the proposals locally and nationally under section 48 of the Planning Act 2008. It also provides a fixed role for local authorities and means we will be following a well-established and clear process to develop our proposals.

We are at the stage in developing our proposals where we will consult to meet this requirement – this is known as a statutory consultation. We will use the feedback that we receive during the statutory consultation to help us develop our final proposals for Sunnica Energy Farm before submitting our DCO application.

As part of our DCO application, we will submit a Consultation Report detailing our approach to consultation, the feedback that we received during the statutory consultation, and how we have had regard to it. When considering our DCO application, the Secretary of State must consider whether the consultation that we have undertaken has been adequate.

Environmental impact assessment

For the proposed Sunnica Energy Farm, we are required to carry out an Environmental Impact Assessment (EIA) of our proposals as part of the planning process. In legal terms, this means it is considered to be 'EIA development' for the purposes of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.

This means we must assess potential environmental impacts from our proposals and, where appropriate, propose mitigation. We will report on this process in a document called an Environmental Statement ('ES') when we submit our DCO application.

At this consultation stage, we will be sharing and seeking feedback on the preliminary results of our assessments. We will do so in a document called a Preliminary Environmental Information Report (PEIR).

More information

You can find more information about the Planning Act 2008, the Planning Inspectorate (PINS) and their role and how to participate in the DCO process on the PINS National Infrastructure Planning website - <https://infrastructure.planninginspectorate.gov.uk/>, or by calling PINS on 0303 444 5000.

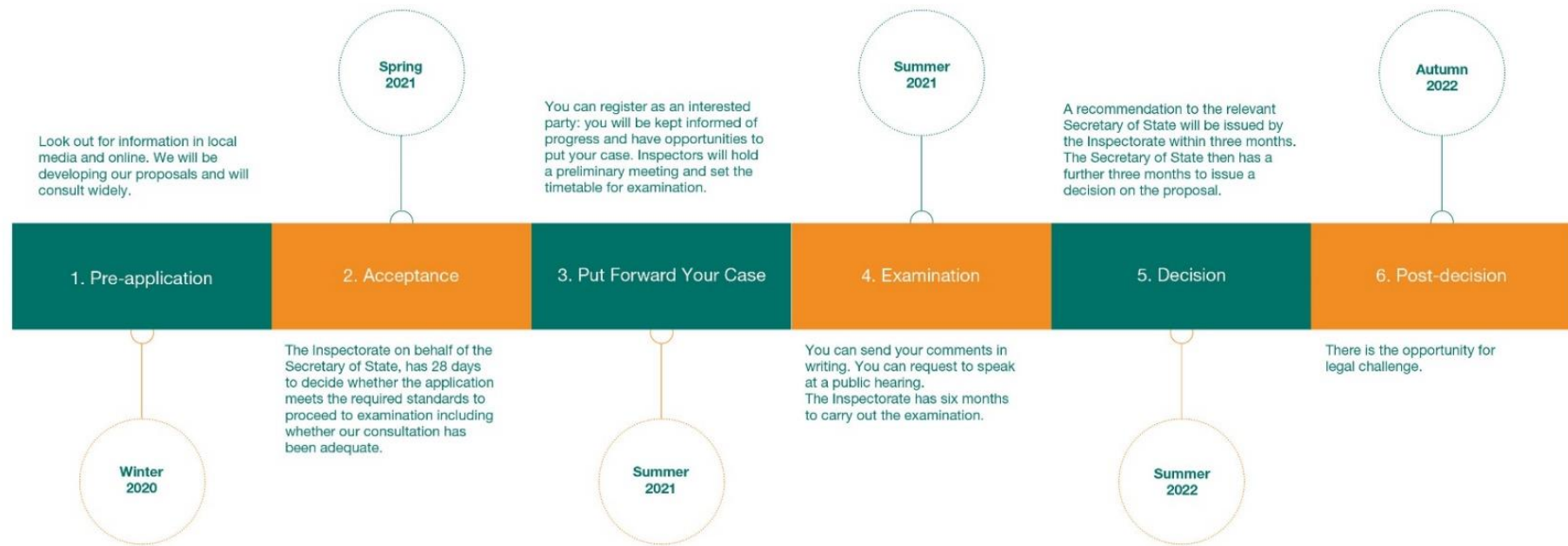


Figure 1: The planning process

The proposed Sunnica Energy Farm

About us

Sunnica Energy Farm is being brought forward by Sunnica Ltd. This is a joint venture between two established solar energy specialists, Tribus Energy and PS Renewables. Both Tribus Energy and PS Renewables are highly experienced in the development of solar energy and energy storage projects both within the UK and abroad, including at Eveley and Oakfield in Hampshire. Together, the partners behind Sunnica Energy Farm already contribute nearly 1GW of clean energy to the UK national electricity transmission system.

Sunnica Energy Farm

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

It would be located across four sites: Sunnica East Site A, Sunnica East Site B, Sunnica West Site A and Sunnica West Site B. Each of these sites would be connected to each other, and the National Grid substation, using underground cables. These will be accompanied by landscaping, biodiversity areas and a range of associated infrastructure including access tracks, construction compounds and offices.

The proposed Sunnica Energy Farm would use ground-mounted photovoltaic (PV) panels to generate electricity from the sun. It will also include two battery energy storage systems, which will allow it to store, import and export electricity to and from the national electricity grid.

Further details of the proposed Sunnica Energy Farm will be included in materials published as part of the consultation. Details of the materials that we will published are set out in the 'Consulting the community' section below.

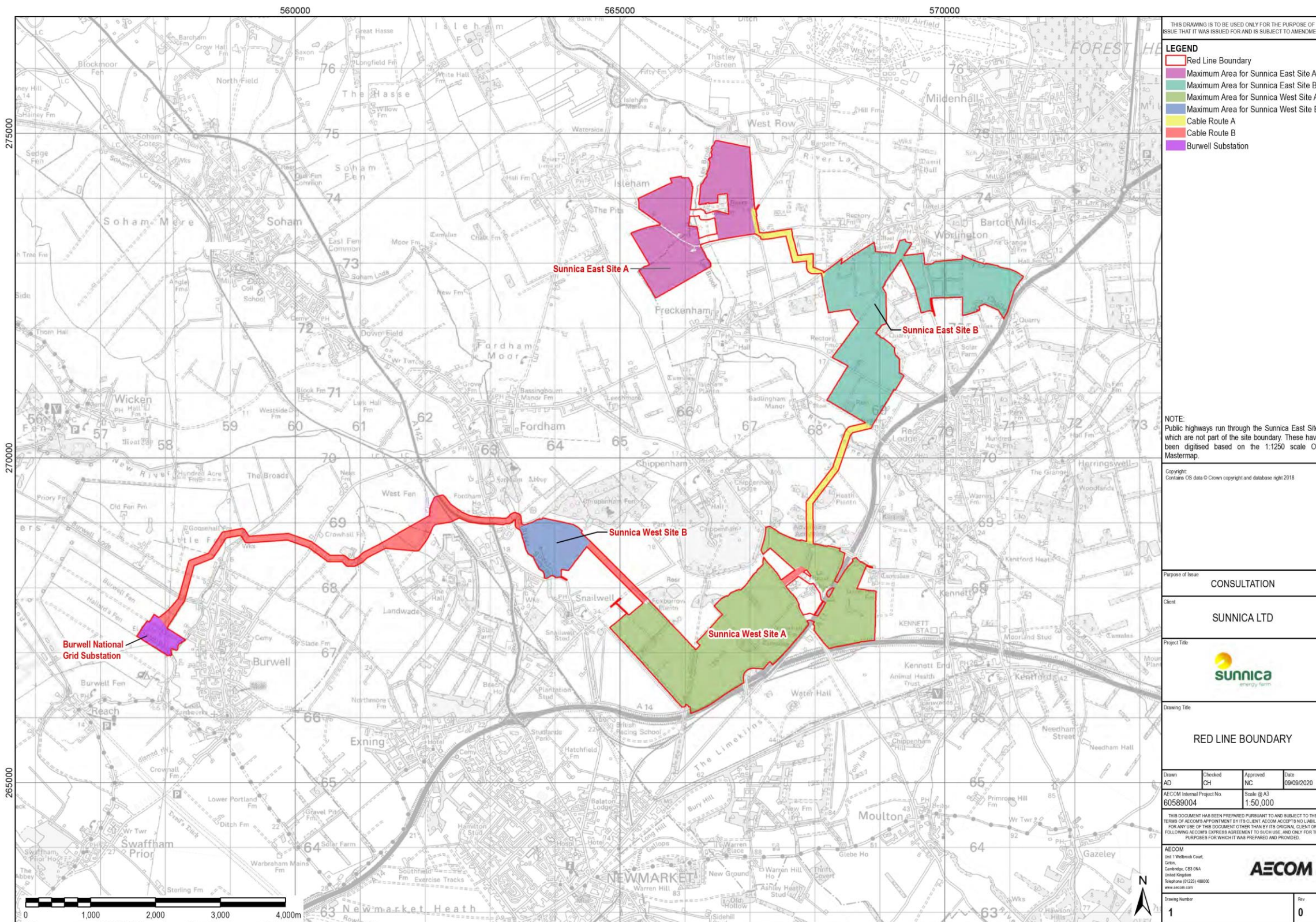


Figure 2: Proposed Sunnica Energy Farm red line boundary

Developing our approach to consultation

We have undertaken early engagement with stakeholders to develop our approach to community consultation.

This has included meeting with officers and members at the local authorities that the proposed Sunnica Energy Farm is located within, relevant statutory advisers, potentially affected land interests, parish and town councils, and relevant members of Parliament. We also conducted a period of non-statutory consultation between 17 June 2019 and 28 July 2019.

During the non-statutory consultation, we held a series of public consultation events in the vicinity of the proposed Sunnica Energy Farm. We also made consultation materials available at a number of public information points and online at the Sunnica Energy Farm website: www.sunnica.co.uk. We considered feedback from the host local authorities in developing our approach to non-statutory consultation.

Through the non-statutory consultation, we invited feedback on our early proposals for Sunnica Energy Farm, our approach to environmental impact assessment, and our approach to consultation.

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

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

We are required to consult with host authorities as defined by section 43(1) of the Planning Act 2008 on the development of this SoCC. We consulted these authorities between 3 August 2020 and 1 September 2020. Table 1 below summarises feedback from this consultation and our responses to it.

Table 1: feedback from SoCC consultation

Feedback	Our response
Clearly set out who we consulted with in developing this Statement of Community Consultation (SoCC).	In developing this SoCC we consulted with Suffolk County Council, West Suffolk Council, Cambridgeshire County Council and East Cambridgeshire District Council.

<p>Ensure that graphics are included in appropriate places to break up the text within the SoCC.</p>	<p>We have inserted graphics into the document at a number of points to explain the consultation arrangements.</p>
<p>Ensure that the consultation zones are clearly set out.</p>	<p>We have produced and included diagrams that clearly set out the three consultation zones. These can be viewed in figures 3-5.</p>
<p>Explain how the Preliminary Environmental Information Report (PEIR) fits into the Environmental Impact Assessment (EIA) process.</p>	<p>We have included information on the planning process for EIA developments on pages 2 and 10.</p>
<p>Clearly set out how the consultation arrangements may change due to the ongoing impacts of the COVID 19 pandemic.</p>	<p>We have set out how the consultation arrangements may change in response to the uncertainty caused by the COVID 19 pandemic. This can be viewed on page 16 of this document.</p>

Consulting the community

We are inviting the community living in the vicinity of the proposed Sunnica Energy Farm to take part in the statutory consultation and provide feedback on our developed proposals. We want to continue to ensure that those potentially affected by our proposals have the opportunity to understand them and provide their views.

We are now sharing details of our advanced design proposals through a period of statutory public consultation to provide the community with further information about the proposed Sunnica Energy Farm and the opportunity to further influence our design proposals.

Consulting during the COVID 19 pandemic

We are consulting at a time when the ongoing COVID 19 pandemic means there are restrictions on holding public meetings and events.

We are aware of how important it is to make sure that anyone in the community who wants to find out more or share their views on the proposals can do so. We have developed a consultation programme designed to allow people from across the community to respond while complying with Government requirements in relation to COVID 19. As such, this document sets out a variety of different ways to find out more information and provide feedback.

In preparing our approach to consultation, we have considered Government guidance on COVID 19: www.gov.uk/coronavirus. We have also considered advice from the local authorities where the proposed Sunnica Energy Farm is located, the results of non-statutory consultation, and best practice guidance such as the National Infrastructure Planning Association's paper *Development Consent Orders and the Coronavirus Pandemic* (21 April 2020).

It is possible that the Government's advice regarding the COVID 19 pandemic may change during the consultation on our proposals or between the publication of this document and the beginning of the consultation. Therefore, we have set out below the different approaches that we propose to take if the Government's COVID 19 alert level changes.

What will be consulted on?

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

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

Environmental impacts

We are in the process of carrying out an EIA for the proposed Sunnica Energy Farm. The proposed Sunnica Energy Farm is EIA development (see page 2 above), and therefore we will be publishing a Preliminary Environmental Information Report (PEIR) as one of our consultation materials. The PEIR builds upon the findings of our Scoping Report and the feedback received during the non-statutory consultation. It will incorporate the results of the environmental surveys that we have carried out to date and will set out our preliminary conclusions on the potential significant effects of the proposed Sunnica Energy Farm on the environment.

The PEIR gives information about the potential significant environmental effects of the proposed Sunnica Energy Farm and the measures proposed to reduce or avoid those effects to assist respondents in making well-informed responses to the consultation.

Who will we consult?

We will consult widely in accordance with this SoCC and encourage participation in the consultation from any person or group who is interested in the proposed Sunnica Energy Farm. Please see Table 2 below for the geographic areas within which we will consult.

We have defined a series of 'zones of consultation' for the purpose of publicising the consultation directly to the local community for the purposes of Section 47 of the Planning Act 2008. This recognises the fact that levels of potential impact and interest are likely to vary with geography.

These zones are set out in Table 2 below alongside maps of the zones of consultation. For consultation zone 1, this comprises a buffer zone of at least 1 mile from the boundary of the proposed Sunnica Energy Farm, extended in places to reflect feedback from the non-statutory consultation and the EIA process.

Table 2: zones of consultation

Zone	Parameters
Zone 1	Any person or group likely to have a direct interest in the proposed Sunnica Energy Farm, as well as their political representatives (at a parish, district, county and Parliamentary level) as defined in Figure 3 below.
Zone 2	People living and working in the host local authorities of West Suffolk Council, East Cambridgeshire District Council, Suffolk County Council and Cambridgeshire County Council outside of consultation zone 1. Figure 4 below shows the location of this area.
Zone 3	Neighbouring districts within the administrative areas of <ul style="list-style-type: none">Borough Council of King's Lynn and West Norfolk

- Breckland Council
- Mid Suffolk District Council
- Babergh District Council
- Braintree District Council
- South Cambridgeshire District Council
- Huntingdonshire District Council
- Fenland District Council

Neighbouring counties and unitary authorities within the administrative areas of

- Norfolk County Council
- Essex County Council
- Hertfordshire County Council
- Central Bedfordshire Council
- Bedford Borough Council
- Northamptonshire County Council
- Peterborough City Council
- Lincolnshire County Council

The location of this area is shown in Figure 5 below.

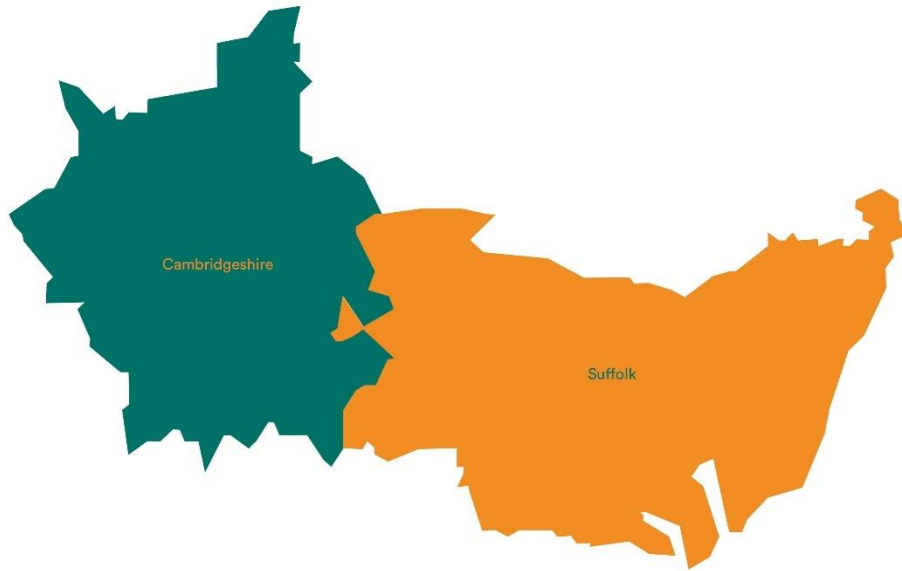


Figure 4: area of consultation zone 2 (source: Ordnance Survey)



Figure 5: area of consultation zone 3 (source: Ordnance Survey)

We will also consult and continue our engagement with a range of statutory consultees as set out by Section 42 and Section 48 of the Planning Act 2008 and additional organisations that we recognise to have an interest in the proposed Sunnica Energy Farm. These groups include:

- Economic interest groups and organisations such as local enterprise partnerships (LEPs), chambers of commerce and representatives of the horse racing industry.
- Heritage consultees including Historic England and the National Trust
- Environmental consultees including Natural England and the Environment Agency
- Infrastructure providers such as Highways England and National Grid
- Conservation groups such as the RSPB and Suffolk Wildlife Trust

How will we be consulting?

We will use a range of techniques to consult the community. These are designed to allow people with different needs across the community to take part in the consultation in a way that is convenient to them while complying with Government guidance on COVID 19. These are set out in Table 3 below.

Table 3: consultation publicity and techniques

Zone	How we will publicise consultation within this zone	How we will consult within this zone
1	<ul style="list-style-type: none"> • Writing to all addresses within consultation zone 1 • Writing to elected representatives, parish councils and community groups within the zone with details of the consultation • Sharing a consultation information pack designed to support stakeholders promoting consultation through their own existing communication channels such as social media feeds with local authorities, parish councils and community groups within the zone • Publicising the consultation in the following newspapers circulating in the consultation zone: the Newmarket Journal, the Cambridge News, Bury Free Press, the Ely Standard and the East Anglian Daily Times. • Publicising the consultation via regional and local broadcasters including BBC Radio Cambridgeshire, BBC Suffolk, BBC Look East • Advertising the consultation on social media • Publishing details of the consultation online at www.sunnica.co.uk 	<ul style="list-style-type: none"> • Sending a copy of a consultation booklet providing a non-technical overview of the proposed Sunnica Energy Farm, the EIA process, the consultation and planning process, how to take part in the consultation, and proposed next steps to all addresses in consultation zone 1. • Inviting enquiries and responses online through the consultation website, by freephone, freepost or email. This will provide a variety of means for consultees to respond in a way convenient to them. • Hosting a virtual public exhibition on the consultation website. • Hosting webinars which will include a presentation regarding the proposals and an opportunity to ask questions. • Inviting elected representatives to take part in briefings through a digital meeting. • Inviting residents of consultation zone 1 to book an individual

		<p>appointment to discuss the proposals by telephone.</p> <ul style="list-style-type: none"> • Contacting community and voluntary organisations within consultation zone 1 to offer direct engagement. • Publication of consultation information online at the consultation website. • Compliance with the most up to date legal requirements in relation to public deposits.
2	<ul style="list-style-type: none"> • Writing to all district and county councillors at West Suffolk Council, East Cambridgeshire District Council, Suffolk County Council and Cambridgeshire County Council • Writing to all parish councils within the consultation zone • Sharing a consultation information pack designed to support stakeholders promoting consultation through their own existing communication channels such as social media feeds with local authorities, parish councils and community groups within the zone • Publicising the consultation in the following newspapers circulating in the consultation zone: the Newmarket Journal, the Cambridge News, Bury Free Press, the Ely Standard and the East Anglian Daily Times • Publicising the consultation via regional and local broadcasters including BBC Radio Cambridgeshire, BBC Suffolk, BBC Look East • Advertising the consultation on social media • Publishing details of the consultation online at www.sunnica.co.uk 	<ul style="list-style-type: none"> • Hosting webinars which will include a presentation regarding the proposals and an opportunity to ask questions. • Hosting a virtual exhibition on the consultation website. • Inviting elected representatives to take part in briefings through a digital meeting. • Publication of consultation information online at the consultation website. • Inviting enquiries and responses online through the consultation website, by freephone, freepost or email.
3	<ul style="list-style-type: none"> • Writing to the Leader and Chief Executive of local authorities within the zone • Publicising the consultation in the following newspapers circulating in the consultation zone: the Cambridge News, the East Anglian Daily Times and Eastern Daily Press • Publicising the consultation via regional and local broadcasters including BBC Radio Cambridgeshire, BBC Suffolk, BBC Look East • Advertising the consultation on social media • Publishing details of the consultation online at www.sunnica.co.uk 	<ul style="list-style-type: none"> • Publication of consultation information online at the consultation website. • Hosting a virtual exhibition on the consultation website. • Hosting webinars which will include a presentation regarding the proposals and an opportunity to ask questions. • Inviting enquiries and responses online through the consultation website, by freephone, freepost or email.

Changes to consultation arrangements

These consultation techniques have been developed to comply with the current COVID 19 alert level set by the Government. At the time of publication, this is Level 3 – the pandemic is in general circulation.

We recognise that the alert level may change during the consultation period, but that it is also important to provide certainty to consultees about how they will be consulted. If the alert level is changed to Level 1 or 2, which would mean the Government considers the number of COVID 19 cases to be lower, we will consider holding public events at physical locations on a voluntary basis. We would also consider placing information on public deposit at physical locations subject to the availability of deposit locations in the vicinity of the scheme. The Government has confirmed that placing materials online meets the requirement to place information on public deposit in the Infrastructure Planning (Publication and Notification of Applications etc.) (Coronavirus) (Amendment) Regulations 2020 (the 2020 Regulations).

In the event that information is placed on public deposit, we will publicise the deposit locations using the methods set out above. In writing to consultees, we will provide two weeks' notice of any events.

The holding of public events and placing information at public deposit locations would require time to organise and therefore we would assess on 27 October 2020 whether it will be possible to undertake these activities. If the alert level remained as 3 or higher on this date, we would not consider it possible to deliver this additional voluntary activity within the consultation period.

We will publicise any change in consultation arrangements by:

- Writing to all addresses and elected representatives within consultation zone 1
- Writing to all district and county councillors at West Suffolk Council, East Cambridgeshire District Council, Suffolk County Council and Cambridgeshire County Council (zone 2)
- Writing to all parish councils within consultation zone 2
- Publicising the change of arrangements in the Newmarket Journal, the Cambridge News, Bury Free Press, the Ely Standard, the Eastern Daily Press and the East Anglian Daily Times, which cover zones 1, 2 and 3
- Publicising the change of arrangements on social media

Depending on the outcome of the consultation, we may conduct further, targeted, consultation on a voluntary basis.

Consultation information

We will produce a range of materials providing information as part of the consultation:

- A consultation booklet providing a non-technical overview of the proposed Sunnica Energy Farm, the EIA process, the consultation and planning process, and proposed next steps

- A virtual exhibition setting out information about the proposals and how to take part in the consultation
- Presentations to be given as part of webinars
- The PEIR, accompanied by a non-technical summary
- A consultation questionnaire designed to collect responses to the consultation

Copies of consultation information will be made available for review free of charge online at www.sunnica.co.uk/downloads and, should it become possible as outlined above, at public deposit points. Hard copies of documents will also be made available on request.

Collection of responses

To capture participants' feedback, we will produce a consultation questionnaire inviting comments on the different elements of the proposed Sunnica Energy Farm. The questionnaire will be made available by direct mail to people living in consultation zone 1, online through the proposed Sunnica Energy Farm website, www.sunnica.co.uk, and on request.

Consultees will be able to respond by completing a questionnaire online or returning a completed questionnaire using the contact details set out in this document during the consultation period. Pre-addressed Freepost envelopes will be made available on request using the contact details set out on page 20.

Seldom heard audiences

It is important to ensure that consultation is inclusive and enables participation from a wide range of audiences, including those who are seldom heard in public consultation such as young people, seasonal workers and those for whom English is not a first language. We will do this by:

- Holding webinars at a variety of times, including evenings and weekends, to enable participation by people with different time commitments and making recordings of webinars available afterwards.
- Making provision for people who do not have access to the internet through the consultation programme. This will include sending a copy of the consultation booklet and consultation questionnaire to every address in consultation zone 1, offering one-to-one telephone appointments to people living in consultation zone 1 and making hard copies of consultation materials available on request.
- Choosing accessible venues for public information points if these are to be utilised.
- Producing our consultation materials in accessible formats, including checking accessibility of online materials.
- Contacting community and voluntary organisations including parish councils and schools within consultation zone 1 to offer direct engagement and sharing a consultation information pack designed to support them in promoting consultation through their own existing communication channels such as social media feeds.

- Providing a variety of communications channels including a Freephone number, email address and Freepost address for those seeking information.

Consultation arrangements

How to take part in the consultation

The statutory public consultation for Sunnica Energy Farm will take place between 22 September 2020 and 2 December 2020.

Consultees can find out more by:

- Contacting us on 08081687925 or info@sunnica.co.uk
- Viewing a series of webinars we will give about the proposals online. These will offer the opportunity to ask questions about the proposals. These will include the following webinars:
 - 18:00 on 01/10/20: Introducing the consultation
 - 14:00 on 03/10/20: Sunnica East Site A and Site B
 - 18:00 on 08/10/20: Sunnica West Site A and Site B
 - 14:00 on 10/10/20: The grid connection
 - 18:00 on 15/10/20: Environmental impact assessments (including landscape and biodiversity)
 - 14:00 on 17/10/20: Construction and operations
 - 14:00 on 24/10/20: Repeat of Introducing the consultation
 - 18:00 on 29/10/20: Repeat of Sunnica East Site A and Site B
 - 14:00 on 31/10/20: Repeat of Sunnica West Site A and Site B
 - 18:00 on 05/11/20: Repeat of the grid connection
 - 14:00 on 07/11/20: Repeat of Environmental impact assessments (including landscape and biodiversity)
 - 18:00 on 12/11/20: Repeat of Construction and operations
- We will publish details of any additional webinars at www.sunnica.co.uk.
- Viewing a virtual public exhibition on our website, www.sunnica.co.uk, which will be available to view at any time from the start of consultation on 22 September 2020 to the close of the consultation at 5pm on 2 December 2020.
- Booking an appointment to speak with members of the project team about our proposals individually. You can book an appointment using the contact details provided below. When booking appointments, we will ask for specific areas of interest to match the caller with a specialist member of the project team for their appointment.
- Reading a booklet summarising our proposals. We will send a copy of the booklet to all addresses in consultation zone 1. The booklet will also be available from our website, www.sunnica.co.uk, and on request.
- Reviewing the PEIR and other consultation documents by going to our website, www.sunnica.co.uk. Hard copies of consultation documents will also be available on request. A charge of £0.35 per page will be applicable for hard copies of the PEIR and its non-technical summary.

Responding to the consultation

We welcome feedback on our proposals for Sunnica Energy Farm. Anyone can share their views by:

- Completing a consultation questionnaire online at www.sunnica.co.uk
- Returning a questionnaire to Sunnica Consultation, FREEPOST reference RTRB-LUJJ-AGBY, c/o Newgate Communications, Sky Light City Tower, 50 Basinghall Street, London, EC2V 5DE or info@sunnica.co.uk
- Submitting their comments by email to info@sunnica.co.uk or in writing to the above Freepost address.

Responses must be received by the consultation deadline of 23:59 on 2 December 2020.

How we will consider the responses

Following the statutory consultation, we will consider all the views that we receive and continue to develop our design for the proposed Sunnica Energy Farm ahead of submitting our DCO application to the Secretary of State. Our DCO application will include a Consultation Report setting out how we have had regard to all responses received.

Any comments received will be analysed by Sunnica Ltd and any of its appointed agents. Copies may be made available in due course to the Secretary of State, the Planning Inspectorate and other relevant statutory authorities so that feedback can be considered as part of the DCO process. We will request that any personal details are not placed on public record and will be held securely by Sunnica Ltd and its agents in accordance with the data protection law and will be used solely in connection with the consultation process and subsequent DCO application and, except as noted above, will not be passed to third parties.

The Planning Inspectorate has also published details of how it manages comments received in a Privacy Notice available on its website:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/879604/Privacy_Note_Final_15042020.pdf

Further information

For further information, please contact us by:

- Visiting the proposed Sunnica Energy Farm website: www.sunnica.co.uk
- Calling 08081687925 (9:00am to 5:00pm, Monday to Friday)
- Emailing info@sunnica.co.uk
- Writing to the project team at: Sunnica Consultation, FREEPOST reference RTRB-LUJJ-AGBY, c/o Newgate Communications, Sky Light City Tower, 50 Basinghall Street, London, EC2V 5DE