

FRECKENHAM PARISH COUNCIL

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Luke Murray
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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

J. Coe

Jadi Coe
Clerk to the Parish Council