

Rt Hon Michael Gove MP  
Secretary of State for Levelling Up, Housing  
and Communities  
2 Marsham Street  
London  
SW1P 4DF

Enquiries to: Isaac Nunn Snr Planning Officer (NSIPs) &  
Phil Watson Strategic Energy Projects Manager  
Email: [isaac.nunn@suffolk.gov.uk](mailto:isaac.nunn@suffolk.gov.uk),  
[phil.watson@suffolk.gov.uk](mailto:phil.watson@suffolk.gov.uk)

BY EMAIL  
[michael.gove@communities.gov.uk](mailto:michael.gove@communities.gov.uk)

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Dear Secretary of State,

### **Developer engagement with communities, and Nationally Significant Infrastructure Projects**

As you may be aware, Suffolk has long experience in hosting Nationally Significant Infrastructure Projects (NSIP) and working in the consenting process. The County Council continues to work closely with your officials, and others across government, to improve the operation and effectiveness of the NSIP regime.

The Council is encouraged by proposals included in the NSIP Action Plan, to improve the effectiveness of pre-application consultation. Considering this, the Council would like to make specific contributions based on their experience not only of NSIPs in general, but specifically in relation to issues arising during the pre-application and examination of the Sunnica solar farm.

Sunnica is one of the largest proposed solar projects in the UK, with an estimated installed capacity of around 500MW of solar panels, and a similar amount of battery energy storage. It is a geographically extensive proposal covering over 2,000 acres, straddling the border of Suffolk and Cambridgeshire near Newmarket, and directly affecting 14 parishes.

The Council recognises that consideration of the recommendations on this project, that have been made by the Examining Authority, are a matter for the Secretary of State at DESNZ in his quasi-judicial role and, for the avoidance of doubt, the Council is not using this letter to seek your direct intervention in the decision-making process for that project.

However, the process by which the project design emerged, the quality of engagement with the host community, as well as issues relating to agricultural land, that were raised by the project, are policy and procedural matters that the Council would like to bring to your attention.

Throughout both the non-statutory and statutory consultation periods, Suffolk County Council received complaints from parish councils and individual community members, that the developers' engagement had been extremely poor. The main issues were:

- The quality and legibility of technical information provided in the Preliminary Environmental Information Report and other consultation materials.
- The failure to articulate a systematic design process which communities could engage with.
- The responsiveness of the developer during consultation events, in particular a perceived evasiveness under questioning; and
- The resistance of the developer to engage where knowledgeable community members raised technical issues, such as those relating to the assessment of agricultural land quality.

The failure of the project promoter in these areas led to a complete breakdown of trust, between the project promoter and the 14 communities hosting the development.

Furthermore, the lack of a meaningful dialogue with the host communities regarding the design, layout, construction, and mitigation for the project, compounded the distrust and ill feeling arising from the poor quality of the application.

Community outrage was further stoked by a perception on the part of the community of a biased assessment of agricultural land quality by the applicant, coupled with the perception of reluctance on the part of the examination, or relevant expert parties, to deal with the matter robustly.

Finally, in the context of Suffolk's vast experience with NSIP applications, we wish to place on record, that the Sunnica application is the worst we have ever dealt with, both in terms of the quality of the application, and the conduct of the promoter.

The council recognises that you and your officials, with other departments, have made significant and welcome progress in NSIP reform. However, based on our experience in Suffolk, on the Sunnica project, and other projects:

- The quality of pre-application engagement should be subject to more rigorous scrutiny, especially prior to acceptance of an application; and
- Communities need a fair process which allows them to genuinely participate in the development and design of new infrastructure.

Proposals, as to how this might be achieved, have been set out in more detail, in the County Council's recent response to the consultation on community benefits and electricity transmission infrastructure<sup>1</sup>.

Given the extent and magnitude of the infrastructure required, to deliver the government's Net Zero target, and adapt to a changing climate, and the speed at which this must be executed; the processes of development consent, should foster community consent, rather than undermine it.

Yours sincerely,



Richard Rout

Cabinet Member for Finance and Environment and  
Deputy Leader of Suffolk County Council

<sup>1</sup> Appendix B in <https://www.suffolk.gov.uk/asset-library/community-benefits-consultation-scc-response-07-06-23.pdf>