

Appendix M received

Copies of the consultation responses

1.1 Responses received to changes consultation (6 June to 6 July 2022)

British Telecom

Dear Sir/Madam

Upon review of the documentation received, it appears that BT has an exchange potentially impacted by your proposals, known as Isleham UAX (Unmanned Automatic eXchange), address below.

ISLEHAM UAX	Freckenham Road	Isleham	Ely	Suffolk	IP28 8HP
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I will seek the copy HMLR plan for your records and will forward shortly. In the meantime, I would appreciate my details being kept on your records so as to advise on matters relating to this property.

Please do not hesitate to contact me if I can be of any assistance in the interim.

Kind regards

Dionne Herelle

Property Professional
BT Property & Facilities Services

Canal & River Trust

Dear [REDACTED]

Thank you for this recent consultation. I can confirm that the Canal & River Trust have no land or waterway ownership or management in the area affected, so have no comments to make on the proposals.

For you information: [REDACTED]

Kind regards,

Claire McLean MRTPI

[REDACTED]

Chippenham Parish Council

We are responding to your consultation on the options to make a grid connection to the National Grid substation at Burwell.

The consultation material contains insufficient information to be able to comment on the changes as we cannot assess, based on the information provided, the impact of the change on local residents and the local environment.

We comment on the Meeting you organised at Chippenham Village Hall on 23rd June:

- 1/ The meeting was at short notice. The advertising of the meeting was poor relying on the Parish Councils to do the advertising.
- 2/ The banner supplied to advertise the meeting only arrived on the 22nd June.
- 3/ The timing of 2.00pm to 6.30pm made it difficult for working people to attend without taking time off work. All Parish Council meetings are held at 7.00pm allowing people to attend after work.
- 4/ The format without a Questions and Answer session was unhelpful. People learn from hearing other questions answered.
- 5/ A number of the Sunnica Team were unable to answer the questions asked. For example how will the layout of the areas be affected by the changes.
- 6/ The pictorial evidence provided was weak. Cross sections on height and appearance were not clear or put up on the display boards.

The distribution of information was not explained to the Parish Council – We did not know who got booklets emails or letters or who didn't get anything. We have people who submitted relevant representations who did get booklets and some who didn't.

In view of the above we are reserving our position as to if this is or is not a material change until after further and better details have been provided and that this important question cannot be determined on the information provided to date as it is totally inadequate.

Richard Fridd

Dear Sir/ Madam

My preference is option 3 has this has no material impact on the existing approved scheme and avoids further unsightly electrical equipment in Burwell.

Regards

Richard Fridd

[Redacted signature]

Sarah Fridd

Dear Sir/ Madam

My preference is option 3 as this has no material impact on the existing approved scheme and avoids further unsightly electrical equipment in Burwell.

Regards

Sarah Fridd



Sunnica Energy Farm



Upton Suffolk Farms

Thank you for the Sunnica Energy Farm consultation. We have no comment other than to support the changes proposed.

Yours

Hugo Upton for Upton Suffolk Farms

Hugo Upton

[Redacted signature block]

John A Leitch

Objections to the consultation on proposed changes to a development consent order (DCO) 06th June to 06th July 2022.

Objections to the consultation as follows, no attempt has been made by Sunnica to address the previous consultation issues which yet again raise the same issues as before.

- i) Size of consultation booklet (A5) has been reduced in size making it too small to fully interpret the maps. The size of the booklet should have been A4 as per the original consultation.
- ii) Clarity of the colour chart on such a small-scale map is very difficult to differentiate with.
- iii) Booklet pages are not numbered so why are they referenced to by page number in the consultation?
- iv) Again, town and village names have been removed from the maps in the section **"changes to approach documents"**.

v) *"These changes are to facilitate an alternative grid connection option for the scheme. This option has been identified as a result of a representation made by National Grid Electricity Transmissions (NGET) that states that one of the original two options that we included in our DCO application is 'not technically feasible'.*

NGET stated that *"our option 1 sub station extension is not technically feasible given the amount of land **NOW** required by the promoter, the planned extension of the substation and NGET License obligation".*

vi) In the original consultation booklet 22nd September – 02nd December 2020 section grid connection. Sunnica declared there were 3 options available within the Burwell National Grid Substation (see page 16) when did option 3 get withdrawn from the DCO and why?

vii) *"These changes are to facilitate an alternative grid connection option for the scheme.*

The above statement is a direct result of Sunnica "The Promoter" requiring more land than originally planned for which left NGET with no alternative but to issue their Representation in order to protect their position in relation to infrastructure and land.

Change 3 Option to allow for additional electrical infrastructure to be added to the substations referred to in an Application at Sunnica West A ,Sunnica East A and Sunnica East B. The change would not involve making the substations any larger than was included in the Application.

Change 3 Note that the Sunnica East Site A (E33) is significantly larger than the site put forward in the Consultation Booklet 22nd September to 02nd December 2020

Summary of the changes

"We are making the below changes because we want to minimise unacceptable impacts to the local community and environment as a result of the scheme".

Change 1 "Option 3 would remove the need to deliver a large transformer to site therefore removing the vehicle movements associated with this delivery".

The above statement will have a profound affect upon the local community, for the following reasons: -

Substations required at Sunnica West Site A, Sunnica East Site A and Sunnica East Site B are changing from 132kV/33kV to the introduction of a 400 kV/33kV transformer at each site.

There is now a new requirement for a shunt reactor to be introduced at Sunnica East Site B. What does this involve?

The infrastructure to these locations of Sunnica East Site A, Sunnica West Site A and Sunnica East Site B will be very limited. To facilitate these extra wide loads there will be a requirement for significant removal of roadside vegetation.

This would create an environmental impact across the proposed routes that would constitute a material change to the DCO.

In conclusion, the consultation of proposed changes is heavily reliant on the approval from NGET. Without this approval the "Scheme" cannot move forward.

Sunnica have not invested enough time and effort in understanding the complexities of connecting their "Scheme" into the Burwell National Grid Substation.

There are significant changes in this consultation document to question whether or not the Original DCO can now be classified as valid to the "Scheme"

All Sunnica have done is to move the problem from one area to another which surely constitutes a material change that needs to be reviewed?

John A Leitch

[REDACTED]

[REDACTED]

[REDACTED]

Andrew Geddes

Sirs

Thank you for making the further information available in respect of the DCO application.

As with all of the previous brochures and paperwork, the overwhelming conclusion is that the application to the Planning Inspectorate should not have been made until there was a cast iron feasible agreement with the National Grid in place

Even now your proposals are hedged in terms that there is nothing positive to consider as you are lurching from pillar to post in the hope that one of the options will finally been acceptable

Again, all of the plans in your latest brochure are very difficult to follow as the planned areas are highlighted with the fading out of the areas in which your sites are situated

No information as to the size of the battery storage containers is given and still no battery safety policy available. In this connection, I note that neither the Suffolk nor the Cambridgeshire Fire Services have been approached for comment or advice

I consider that the DCO application should be withdrawn and re-submitted at a time when you can give a clear indication of how and where the scheme will be sited and operated

Regards

Andrew Geddes

Freckenham resident

Anette Flindall

To whom it may concern,

CONGRATULATIONS, Yet again you are guilty of minimum consultation to the residents who will be affected by the change in your horrendous Solar Industrial proposal.

Some received a colour brochure, some a letter or email others absolutely nothing and when speaking to residents, admitted they knew absolutely nothing about any change. Many residents are elderly and have no way of being informed unless receiving written information. You conducted two short open consultations meetings both in Cambridgeshire none in Suffolk where the changes are proposed and will have the greatest effect on the local community. When attending the meeting, embarrassingly you could not answer many questions raised! So of the 10,000 residents who will be affected how many did you inform in one way or other?

Those of us who did receive correspondence from you, some two weeks into the consultation period, have very little information to make an informed opinion

You propose is a non material change, what is the difference between a minor material and a material change? What impact will it have to the National Highways and residents? What is the increase in size and capacity of the new batteries? What changes to the cabling? Until these questions and many more are answered I am sadly unable to make an informed opinion due to lack of information on your part. Please can you send me a reply to my questions.

The inadequacy of the consultation from you regarding this whole proposal has been shameful and in all honesty should be scrapped and started from scratch.

Anette (Netty) Flindall/

Nick Wright

Dear Sirs

Consultation Proposed Changes ending 6th July 2022

I have received a booklet in the post and attended the meeting held on 23rd June 2022 at Chippenham Village Hall. It has been difficult with the short timetable to prepare a response, and the information provided has been minimal and not sufficient to form an opinion as to if the changes that are proposed are material. I have requested further information on a number occasions without a response.

As the information and response has been so inadequate I am not able to make an informed judgement.

Yours Faithfully

Nick Wright

Catherine Judkins

Dear [REDACTED]

Thank you for this. I have looked at the viewpoints indicated below but these don't seem to be visualisations of the battery/substation compounds?

I'd also enquired some time ago (during the Red Lodge Parish council meeting that Sunnica representatives attended in March) about getting a copy of the indicative plans that you have for the BESS/substation compound layouts. I understand that these indicative layouts and plans were used as a basis for the modelling work etc that you have undertaken. I followed up the request I made at the meeting with an email to Nigel Chalmers. As yet I have not received a copy of any indicative plans for these areas. The photomontages in your links below do not show these.

Please accept the below text in italics as my personal response to this latest consultation on the proposed changes to the Sunnica Energy Farm scheme for the consultation that has taken place between 6th June - 6th July 2022:

I have reviewed the consultation material provided in the booklet, online and at the Chippenham exhibition. I have spoken to several Sunnica representatives about the proposed changes during the Chippenham exhibition and also asked questions via email. Unfortunately the responses I received were more unknowns or 'not sure' answers and do not allow me to fully assess the impacts these changes will have. In addition, I have made repeated requests for clarification of the substation and BESS sites relating to these changes and this has not been forthcoming. I am struggling to understand the visual impacts from these significant, and late, changes to the substations that you are proposing to the scheme as it seems the visual impacts have not yet been assessed by Sunnica and no visualisations of the areas subject to change have been prepared. The additional infrastructure that is proposed for these sites has not been clearly explained. Furthermore, I cannot find any assessments of the other impacts (transport, noise etc) of these changes on the surrounding area. I am therefore reserving my position on these latest proposed changes until more information has been presented and when surveys and assessments of the environmental impacts are available. At present the proposals are far too vague to be adequately reviewed.

Many thanks,

Catherine

(Catherine Judkins)

Nick Bennett

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

5th July 2022

Dear Sir or Madam

I am responding to your consultation on the options presented to facilitate a connection to the National Grid substation at Burwell and in particular the changes to the substation near Chippenham.

My comments on the Meeting you organised at Chippenham Village Hall on 23rd June are similar to those submitted by the Parish Council but I also want to register them personally:

1/ The meeting was at short notice. The advertising of the meeting was poor and relied on the Parish Councils to do the advertising.

2/ The banner supplied to advertise the meeting only arrived on the 22nd June.

3/ The timing of 14:00hrs to 18:30hrs made it difficult for working people to attend without taking time off work. All Parish Council meetings are held at 19:00hrs to allow people to attend after work. I am sure another date could have been provided by the village hall that did not conflict with an evening Zumba class.

4/ Insisting the consultation format could not be changed to that of a meeting was unhelpful and suggests the Sunnica team are overly concerned about being robustly challenged. A Questions and Answer session would help disseminate the information better as people learn from hearing other questions answered.

5/ The pictorial evidence provided was weak. Cross sections on height and appearance were not clear or put up on the display boards.

6/ Lastly I found it particularly disingenuous of the Sunnica team to state the substations would not be any bigger than in the original plans when they will be and this was confirmed by at least three of the attendees. Please see attached picture of one of your displays with the text highlighted. I feel a more accurate statement would be; 'the substations will be taller but still within the maximum height allowed for in the original application'. I appreciate this is a small point but it does give a clear representation of your arrogant attitude and apparent disregard for being open and honest.

Regards

Nick Bennett

Kevin Pallant

Dear sir/madam

I felt that there is a lack of clarity in the information available, therefore unable to fully assess the impact of the changes.

Kind regards.

Kevin Pallant.

Isobel Newport-Mangell

Please find below my comments on the Consultancy on Sunnica's proposals to make changes to its application for a Development Consent Order for the Sunnica Energy Farm.

The quality of the information submitted – as indicated in the Notice publicising the consultation – at best lacks the detail required for the interested parties to satisfactorily study the extent of the changes proposed – at worst leads to links that don't work: the following link on page 4 of the Consultation Booklet

onal as submitted can be found on the by the
nd Planning Inspectorate's National In this
for the Infrastructure Planning website: <https://infrastructure.planninginspectorate.gov.uk/projects/eastern/sunnica-energy-farm/?ipcsection=docs> of Stat
export for Bus
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results in an error message: HTTP Error 400. The request URL is invalid.)

The concern that there would be a (continued) lack of rigour in the documentation and information for a public consultancy in such a short time frame has been borne out by this fundamental error in communications.

This poor presentation extends to the maps on pp 13-15 in the Consultation Booklet to which the consultees are directed – none of the sites labelled – none of the settlements either, nor the roads: no idea what we are looking at in relation to the text they are supposed to support. What are 'Solar Stations?'

Also the hatchings don't seem to represent what the legend suggests and the complete omission, in the Booklet, of means of identifying the BESS installation sites gives an insufficient oversight of the global context in which these changes are being proposed.

The emphasis is entirely on how few adverse environmental effects are 'anticipated', how the footprints and heights will not exceed those on the original plan. Are these factors the only considerations in an environmental impact assessment? The fact that environmental impact assessments appear to be a WIP: qualifiers like 'currently undertaking work', 'we do not expect' (again, the time frame is insufficient for a consultation on a change of this magnitude) cannot possibly constitute sufficient concrete detail on which interested parties can comment.

So what has changed? Where is the detail on those changes? All we can glean from this consultation booklet is how little (other than the computations of juggling the various options) will change, as far as the physical presence of these new installations are concerned. But this is about much more than dimensions. There is mention of electrical infrastructure to be added to the substations – but, in the outline, no data on which the interested parties can make informed decisions, or no clear link to the documentation that might give more information on this key area.

I find 'No amendments will be required as the developable area of, and works required at, each substation will remain the same.' an unlikely proposal.

Exactly the same works required for additional electrical infrastructure? Really? Same traffic? Same installation procedures?

This feels like a rushed job. There are a lot of repeated reassurances, but very little detail on what WILL be different – even in outline – to support these claims. Whilst the Consultation Booklet we are asked to refer to can only give outlines or summaries – there is inadequate guidance, in the Notice, on where to find such detail. I feel that the objective has been completely missed here – and that, as an interested party, my insight into the detailed nature of these proposed changes has been frustrated and, as a result, this does not feel like a proper consultation.

Isobel Newport-Mangell
Chippenham

Richard Saul (Chairman, Red Lodge Parish Council)

F.A.O. Sunnica Energy Farm

Reference: Response to the request for consultation on the proposed changes to the Sunnica Energy Farm Plans.

This statement is supplied by Unique Reference: 20030784 Richard Saul

I have been party to and have agreed to the response already provided and submitted earlier today by the Parish and Town Council's Alliance as the representative member and Chairman for Red Lodge Parish Council. This response is **personal** although is representative of the feelings of many of the residents of Red Lodge.

Although the information received in booklet form is comprehensive in its ability to explain the cause and why the change has to happen and goes some way to explaining what physical changes residents will experience, there is no information relevant to the proving of the impact of such changes. However, we do understand that this may appear in the more detailed submission to the Planning Inspectorate in July and therefore I am simply pointing out our expectations of the deliverable by Sunnica at that point.

As you are aware, the Residents of Red Lodge have a serious concern about the battery infrastructure (BESS) risk assessments undertaken to date. We are aware that solar farms across the world have been accepted as of suitable low risk by parties involved, only to be proven time and time again that the fire services find themselves inadequately prepared to deal with such serious incidents. We fully understand that Sunnica wish to leave the selection of battery requirements to a later date and understand that this is allowed for in the legislative process (Rochdale Envelope), but we are also aware that no risk should be accepted when investment can remove that risk (as is the case with battery technology) and therefore must make it clear that the safety of people and especially children should be paramount in the final selection consideration. Let's not forget that Grenfell was delivered by contractors, signed off by the fire services, yet the fire services and residents had concerns. I'm sure I need not elaborate any further, but I'm sure you can see a very strong correlation.

That leads me to the issue of your proposed changes which fall into two categories:

- The increased risk (if any) of converting the energy from 132kV to 400kV using a 400kV/33kV transformer and the introduction of a shunt reactor within Sunnica East Site B. The project detail should itemise any additional risks and risk mitigation and reference examples of current battery sites where such conversions and use of such equipment successfully happens.

- The introduction of 400kV cables replacing the originally proposed 132kV cables underground.

Again what are the changes in detail, are cables going to be laid deeper, or if at the same depth, will the cables create a greater risk should they be disturbed. There is mention of a reduced number of cables (one set of three), what are the contingencies, repair time and resultant effects at the connections each end should these be disturbed. I would expect to see Sunnica provide risk assessments and risk mitigation, with examples where such cables carrying the same kV are run safely at similar depths and have been signed off as safe by the correct authorities.

As you are already aware, the residents of Red Lodge are extremely worried about the proposals for the BESS in Sunnica East Site B. Residents are not prepared to live with the thought they will require evacuation plans. These proposed changes simply add another layer of concern (especially when you can google Transformer fires and realise you are now going to place one of these in a BESS), so it is very important for Sunnica to provide detail (better explanation, design & proof) that will at least mitigate these concerns in their July submission of proposed changes to the Planning Inspectorate, as surely these elements of the project need definition (unlike the batteries at this stage) and therefore shouldn't be subject to the Rochdale Envelope approach,

Yours Sincerely,

Richard Saul Unique Reference: 20030784

Chairman - Red Lodge Parish Council

Shazia Shujah

Unique reference 20031140

Dear Sirs,

I am writing in response to the consultation to make technical changes to the grid connection to the substation in Burwell.

Unfortunately, the timescales are insufficient to fully understand and research the impact of the changes proposed. The shunt reactor is a concern, not only will this affect the visuals, it will also elevate the risk of fire and ultimately has serious health and safety concerns. This was not included in the original application, thus the amended planning application lacks information to make a decision on.

Regards,

Shazia Shujah

Paula Mackenzie

Planning Act 2008 (as amended)

Application by Sunnica Ltd for Development Consent for the Sunnica Energy Farm

Consultation on Proposed Grid Connection Alternative Options

I live in the village of Worlington, -unfortunately I feel the consultation was a bit of a pointless rushed ill planned exercise.

I was more than a little disappointed that our household only received a letter informing us to the dates of your exhibition and was void of an updated informational booklet. We live within 400meters of your proposed boundary. The lack of said booklet seems to be a very poor attempt at a consultation from the start. I can only assume you didn't have time to produce informational booklets and get them distributed in time for the deadline that you requested.

As for the exhibitions themselves, two were held both on week days and both in Cambridgeshire villages. Where was my exhibition? Why not one in Suffolk?

My husband was unable to make either of these dates due to short notice and work commitments. I myself was intending to drop in to Chippenham after school pick up with my son. Unfortunately I was called to collect him early by the school as he had had a nasty fall, therefore I was I was also unable to attend.

In regards to the short time frame that I had to read through the changes, there was not enough answers for the questions I have. I feel it really lack Q&A opportunity.

At this time I am not in agreement to the proposed changes and reserving our position as to whether or not this is a material change until more detailed information is provided.

Paula MacKenzie

Barbara Murfitt

To who it may concern ...

Please note my concerns are as follows:-

There is very little detail regarding the changes that Sunnica are proposing. Are these changes technically feasible?
How can we assess the impact of the proposal with little or no information.

Including the possible significant affect on many of the Isleham residents on the visual impact, traffic, large vehicle deliveries, noise etc I did not receive a consultation booklet and so am concerned at the lack of information regarding the proposed changes. I was concerned that a meeting was not held in Isleham to allow all villagers to attend and participate in a face to face meeting. And so obtain up to date information on the proposed changes. So it is not possible to assess the changes due to the lack of details.

I am concerned that there larger cables may be used. What does that actually mean?

The local productive agriculture land must be protected, especially in the current world situation where we need to continue to produce our own food and not rely on food from other countries. The high yielding farmland of the fens around Isleham is a valuable recognised national resource.

I would like to know if brown field sites / rooftops etc have even been considered, and if so where.

Because of the serious lack of clarity of the proposed changes it is impossible to assess the proposals.

Regards
Barbara Murfitt

Rebecca Norbury

Dear Sunnica Energy Farm,

I received your letter on 15th June but unfortunately couldn't attend your exhibitions as they clashed with work. I have had a look through your online material but I am not clear about your proposed changes. I am not sure what you mean by a "Modification application/ agreement with NGET"? I thought you had a grid connection agreement with National Grid already? Please explain the modification to this? I am also not clear why you are retaining Option 2, if the required compulsory purchase is not likely to be obtained. Why are you only removing Option 1 from the DCO but not Option 2? Where does this leave you if Option 3 is not feasible?

I don't feel I can be consulted at this moment as the changes are not clear to follow.

Regards,
Rebecca Norbury

Justin Fuga

Dear Sir/Madam

Please see below comments about your latest scheme changes.

- I don't understand the situation at Burwell. You say that National Grid won't allow you the land for Option 1. Do they plan on building on it? If they do, how will you connect to the Grid? Especially if Option 2 is no longer viable.
- How much of the scheme requires compulsory purchase? Are there other areas that may need to change if the landowner is unwilling to let you use their land?
- What is your plan if Option 3 isn't viable? What about the other Option 3 that was mentioned in your previous consultation? Could that still be used?
- What are the benefits of using 400 kV cable? Why had 132 kV been chosen? Is 400 kV cable safe across such long distances? Will you be burying the cables underground or looking at over head cables?

There appears to be a lot of missing or unknown information about these changes. I don't feel that I can fully assess your plans until these unknowns have been clarified. I reserve my right to be consulted until more information about the proposed changes is made available.

Regards,

Justin

Isabel Cross

Planning Act 2008 (as amended)

Application by Sunnica Ltd for Development Consent for the Sunnica Energy Farm

Consultation on Proposed Grid Connection Alternative Options

I am responding to your consultation on the options to make a grid connection to the National Grid substation at Burwell.

Can you further explain the paragraph stating that Option 1 is not technically feasible? Who is the Promoter? If there was already a planned extension to the substation this must have been known, can you explain how this failed to enter the discussion.

Why did Sunnica hold a public consultation when based on **no** written confirmation from the operator of the grid connection essential to the scheme? Please explain your grid connection offer. Without these details I don't feel able to comment

Are you consulting on Option 3 without confirmation that it is definitely technically feasible (the booklet PDF has no page numbers, or I would reference!). Please explain more details about what is needed to confirm the technical feasibility of this and when you are likely to know the outcome. I reserve my consultation comments until I have received more information about the new option.

Option 2 is preferred by NGET and might need to acquire further land. Will there be new land acquisition required to take wider and altered cable routes across the scheme. It is impossible to consult on the feasibility or otherwise of Option 2 on these grounds without Sunnica demonstrating the cumulative area of land now required along the routes and the ownership/acquisition of the new proposals.

There is insufficient information on a 'shunt reactor' to comment on the consultation. Please provide more details about this so I can comment

How exactly will the construction methodology required differ (as stated) from the DCO application? What differing impacts will it have on community, landscape, highway movement, noise, timescales? I cannot be consulted on this without more details.

What are the operating noise differences at each of Sunnica West A and B and East A and B with the different equipment now proposed over Option One? Please provide details to enable me to submit my views

Where are the electromagnetic field calculations and impacts known to be associated with 400kv cabling explained and safety evidenced? For example, demonstrating impact of health and exposure corridors relating to this scheme and the re-rated cabling of the new proposal? I don't feel that I can be consulted on the limited information provided.

The expert at your exhibition said he did not have the report available to him to explain. Please provide more details.

When you speak of power import and export do you mean buying and selling electricity for profit? How will the proposed changes affect this? I can't really comment until I have more information about this.

Overall the consultation information is lacking and I reserve my right to be consulted until more adequate details are available

Yours
Isabel Cross

Sandie Geddes

Dear Sunnica

I attended the consultation at Chippenham and, while I have no complaint about your pleasant and attentive representatives, learned very little more than was contained in the Changes Booklet. The display boards were just larger versions of booklet pages and equally thin on detail. The exception were a couple of line drawings of a substation and shunt reactor, which were not included in the booklet's hard copy so residents without computer access were denied this detail.

However, the line drawings were of little use as they were shown in isolation, there was nothing with which to compare to give visual scale until, studying the online copy, one noticed the comparatively tiny fences at either side, then its massive height became shockingly apparent. A two dimensional line drawing is difficult to visualise as a 3D image, surely it would not have been difficult to create a representative computer generated 'photo'. I was astonished to be told that it would not be possible as the BESS and substations had yet to be designed and wouldn't be until the DCO was granted! I was reminded that a photograph of a BESS compound and substation had been provided in the original brochure, but that is highly unlikely to be representative of the scale of the BESS and substation complex at East Site B. However, I was assured that changes would be on the same footprint - but would they have the same skyline, be more intrusive, or be bulkier?

We need to know what the most visually intrusive and alien element of the scheme will look like. The lack of a visualisation of the BESS and substation complex is a glaring omission. Because there are no 'before' and 'after' visualisations we have no way of knowing if the Shunt Reactor and its substantial brick-built transformer will constitute material change.

I received a puzzling response to my question on the current situation: Option 3 is still awaiting National Grid's approval, which could take weeks; and if not accepted, the plan would revert to the apparently 'unacceptable' Option 2 – very contradictory! I did not receive any answer as to why Option 3 wasn't chosen in the first place.

I honestly don't know how these changes will affect us – I am no wiser now than before.

Yours sincerely

Sandie Geddes

Dr Barbara Richardson

I did not receive an explanatory pamphlet by mail as suggested and needed to download and print it out myself. Having read that, I attended the Burwell Public Exhibition, where pamphlets were available. .

I was sorry to find that the Chair of Sunnica had not bothered to attend, and that there was only one person who presented as the technical person from Sunnica - the other people were from Aecom - environment and communications (sub-contractors). None were able to talk about the changes in the cable as proposed in option 3. They seemed not to have considered the increase in the voltage through the cable and any implications that could have for possible magnetic field leakage. The cable is proposed to run at only a one-meter depth under public footpaths and crop growing fields.

In addition they were not able to discuss any possible effect on the fire risk at the Sunnica battery sites caused by the introduction of the further array of transformer equipment near those batteries.

It is of concern that at this point of the final submission of the application for a Development Consent Order that a basic risk assessment seems to be absent and this makes the consultation rather meaningless.

Dr. Barbara Richardson
Fordham

Alan Richardson

I have read the information provided by Sunnica on the grid connection options change to the DCO and attended the event at Burwell.

There was no adequate risk assessment provided on the new option 3. In the original proposals, the battery storage was a major fire risk (as evidenced by the multiple fires in grid scale batteries around the world). In this proposal major equipments are proposed with very high operating voltages and energies very close to the battery installation with no apparent consideration of the effect on the overall fire risk (given there is no comment on it in the documentation). The change to 400kV transmission (from 133kV) from remote sites to the grid connection also may give rise to safety issues that are not addressed in the documentation; for instance, other things being equal, leakage fields from a 400kV line may be larger than from 133kV lines.

When I asked Sunnica's representatives at the Burwell meeting; none of them were articulate on the technical and safety issues I raised. In view of the inadequacy of the information presented, I do not consider the consultation to have been adequate.

Best regards
Alan Richardson
Fordham

Tracey and Richard Minshull

Dear Sunnica

Thank you for your letter about the consultation. We thought that the Grid connection had been arranged and that this is the reason you have chosen this area for this huge industrial development. Why has this been withdrawn?

We don't really understand your proposed changes or why they are needed. Why has this only just been found out now? It causes more confusion. As it stands, We have had a look at your website and We can't figure out what exactly you are proposing. You have presented Option 3, but don't yet know if this will be feasible. What happens after that? Option 4, 5, 6 , maybe more? What are shunt reactors? How big are they? How do you plan on getting them to the sites at East A, B and West A? How noisy are they? Will they be screened?

There is very little detail in your consultation material to help me review these new plans. We don't feel that We can be consulted until more information is provided.

Regards Tracey and Richard Minshull



CONSULTATION FEEDBACK

6 June 2022 to 6 July 2022

Sunnica Ltd is consulting on its proposed changes to its Development Consent Order (DCO) application.

This consultation is your opportunity to express your views on our proposed changes before we submit a change application to the Examining Authority.

How to respond to this consultation

You can respond to the consultation by:

- Writing your views below and returning this form to: **FAO Sunnica Energy Farm, Freepost SEC NEWGATE UK LOCAL**
- Writing your views below, scanning or photographing the form and returning it by email to **info@sunnica.co.uk**
- Writing to us directly using the email address or Freepost address above

Responses must be received by Sunnica Ltd by 11:59pm on Wednesday 6 July 2022.

Any elements of responses that refer to aspects of the Scheme that are unrelated to the proposed changes will be disregarded by the project team.

Please write your comments on the proposed changes below:

As in previous consultations, insufficient information is provided on these changes to enable one to comment properly on them.

Change 1.

This is said to be the deletion of Option 1, yet rights through land involved are still required underground. Therefore one aspect of Option 1 remains, even if minor, so this Change 1 cannot be said to be "deletion".

Change 2.

This is said to be "Non-Material", yet Change 2 involves a very significant change in proposed technology, increasing voltage on the cables from 132 kV to 400 kV, with unknown hazards from the 400 kV underground cables if Option 3 is pursued. No information has been provided on the radically different insulation requirements presumably required for the increase to such high voltages.

Change 3.

Overleaf.



**Change 3.**

Insufficient information is provided on the changes required to the high voltage transformers required under Change 3. These are said to be within previously specified envelopes, yet overall visual appearance is not specified. In particular, the greatly increased voltages proposed to 400 kV may require radically different insulation techniques and the use of glass or porcelain insulator strings similar to those used on 400 kV transmission pylons, with different visual impact, and the generation of noise pollution from "wind tones" in certain wind conditions. This change would likewise not be "Non-Material".

Inspection of the drawings for the proposed "shunt reactor" apparently shows glass disc insulator strings along visible cables. Yet no drawings were provided for the up-rated transformer units under Change 3. What insulation strings are needed in a 400 kV system ?

Locations for the "shunt reactor" are not specified, only that it is "somewhere" within the compound at East B. This is unsatisfactory because the visual (and potentially the noise) impact cannot be judged. The "shunt reactor" aspect of Change 3 cannot be judged.

The necessity for the deployment of a "shunt reactor" at all is not clear. Sunnica representatives at Chippenham explained that the reactor is required during commissioning or start up of grid connections and transformers. The alternative would be the purchase of "reactive power" (that is, alternating current out of phase with voltage) from National Grid. It is not clear why this is necessary only under Option 3. There is indeed no fundamental reason in electrical engineering why they would not arise with the 132 kV Option 2.

Therefore I don't understand why the shunt reactor has been introduced under Change 3 apparently only for a 400 kV system. Is the shunt reactor also intended to be used under Option 2 if this is pursued ? The same problems would arise in principle even then, when the solution (for Option 2 as specified) is presumably purchase of reactive power as necessary. If purchase of reactive power in start-up was the intention under Option 2 it is not clear why the same solution cannot be adopted under Option 3. In other words, it not clear that the shunt reactor element is essential to the function at all.

Why is it there ?

Please only provide the below details if you wish to.

Name:

Address:

Telephone:

Email address:

Our privacy policy: Your comments 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 your comments can be considered as part of the Development Consent Order (DCO) application process. We will request that your personal details are not placed on public record and will be held securely by Sunnica Ltd in accordance with the data protection law and will be used solely in connection with the consultation process and subsequent Examination and application process and, except as noted above, will not be passed to third parties.

Nicole Langstaff

Please find below my comments on the above.

I have reviewed the latest Consultation document and attended the exhibition event at Chippenham.

The details of the proposed changes presented were restricted only to the original maps highlighted with 'areas of change': No new details, viewpoints, or any impacts or assessments were included.

No details of the technology in respect of the proposed Sub-station or change to cabling were satisfactorily demonstrated.

I had a lengthy discussion with two members of the Sunnica project team, and whilst they attempted to answer my questions, it became apparently clear that NO further assessments had been undertaken, and that they were relying on various 'scenarios' rather than actual, fully assessed options and project outcomes.

I consider the information supplied inadequate, and was not in any way reassured that the proposed changes had been thoroughly considered.

Proposing, at this late stage, that the DCO Application include two options (neither of which are yet known to be technically feasible), and that the technology to be employed will be determined AFTER the DCO Application, demonstrates the scheme is clearly not at a stage to be Examined.

Please confirm safe receipt of this communication by return.

Regards

Nicole Langstaff

Claire Mills

Dear Sir

The Planning Inspectorate has advised me by letter of the proposed changes you propose making now that Option 1 is no longer on the table.

I have studied Options 2 and 3 and wish to comment as follows.

It is evident Option 2 relies on a Compulsory Purchase Order and that Option 3 relies on The National Grid giving their consent.

However the DCO should never have been submitted to The Planning Inspectorate in November 2021 unless a signed contract was available with National grid.

I also note that at this point in time it is not known if Options 2 and 3 are technically feasible which means there is a risk factor.

In my opinion Sunnica Ltd has rushed through a non-statutory consultation of 4 weeks without giving due consideration to the consequences to Sunnica itself and the general public.

It does not compare in any one way with the same type of consultation in June 2019 and therefore the wider public in the areas affected by your scheme proposals have been unable to judge exactly what these changes will mean as regards the general environment. There is scant information on the electrical changes at the substations and a lack of understanding of exactly what a shunt reactor is and if it will pose a noise nuisance to local residents.

The 3 Options as explained are confusing and it is unclear, as an example, if a shunt reactor will be installed at each of the three locations.

Again more information on the cable route would be welcome and if in fact the 16km route to the Burwell sub station will pose any dangers bearing in mind there is an upgrade to 400KW for the whole route.

For All these reasons I cannot agree that the changes proposed are adopted by The Planning Inspectorate. The short term non-statutory consultation has not been carried out in a satisfactory manner, there are the risks associated with Options 2 and 3 and it is not known if even the proposed changes are technically viable.

I suggest the present Application is withdrawn until such time a legally binding agreement is available with the parties concerned.

Please kindly acknowledge receipt of the email.

Yours faithfully

Claire Mills

Denis Field

Sunnica,

I was one of the limited number of residents from Suffolk that were able to attend one of your 'consultations' that were held in Cambridgeshire, however I was totally disappointed with the lack of detail with regards to the changes proposed and therefore find it impossible to express my opinion on them. I attended the Chippenham session.

I asked questions relating to the size of the 400KV substations, simply to be told by a Sunnica representative that "he believes the engineers can get the equipment into the same size unit". A 'belief' is not a statement of fact. Surely, if you are proposing changes, you should know the facts? Can you please provide detailed confirmation of the building/structure size now required across all the proposed sites?

There were some elevation plans in the centre of the room which did not have any explanatory notes with them, therefore making them extremely difficult to decipher, once again when I asked for further explanation of what the plans were attempting to show the representative was unable to provide any.

Having spoken to many of my neighbours it is clear that the majority of those that were made aware of the two consultations, were unable to attend, either due to the limited time slots (i.e. during the working day), distance to travel and lack of accessibility via public transport. Why did you not hold consultations in Suffolk so that all affected and interested residents would have the opportunity to attend and comment?

Yours sincerely,

Denis Field

Helen Faulkner

Dear Sir

I live in Red Lodge which is in West Suffolk and am very much affected by any material changes to the DCO which would affect the entire boundary of your Solar proposal.

I have been informed of your proposed changes put to The Planning Inspectorate and cannot agree for these to be put forward as there has been once again inadequate consultation.

There are 3 BESS sites each with an adjoining sub station, 2 of which are in the West Suffolk boundary and 1 in East Cambs.

You have elected to have 2 events in East Cambs and none in West Suffolk. This is despite the 1 and only shunt reactor being placed in the largest site in Elms Road which is very close to where I reside.

Surely this non-statutory consultation should have been run on exactly the same lines of that in June 2019 Therefore I have had to rely on your website for information whereas I would have welcomed a face to face meeting at an event in West Suffolk.

Therefore I am confused regarding your comments on the 3 Options but as I understand it Option 1 is no longer available leaving Option 2 and 3 which at the moment it is not known if either is technically possible. I have concerns about noise levels from additional electrical equipment at the 3 sub stations with the additional shunt reactor at the Elms Rd site.

I am also concerned re any additional risks with fire and explosion from the BESS with all the added equipment and the fact the whole cable line of some 10 miles will be high voltage 400KW.

The present consultation of only 4 weeks makes it impossible to make a judgement without the public being made aware of all the environmental affects and Health and Safety issues and proper tests on noise being carried out especially concerning the shunt reactor.

It appears to me Sunnica has tried to persuade the public to agree to large scale alterations to the DCO in a very limited time frame meaning more work needs to be done by Sunnica to engage with the public on their options.

Please acknowledge receipt of this email.

Yours faithfully

Helen Faulkner

Alan B Smith

27TH June 2022

[REDACTED]

[REDACTED]

[REDACTED]

Subject. Response to non-statutory consultation ref changes to DCO

I wish to respond to the above and have read your booklet on the proposed changes.

It is noted Sunnica assumes the changes are Non-Material, I disagree with this assumption.

It is impossible to make a decision on this consultation as there is a lack of detail, confusing comments on Option 1, 2 and 3 and evidence this is a quick fix following the request from National Grid to have option 1 removed from the DCO.

There has been insufficient time given by Sunnica Ltd to produce to the public a reasoned judgement for the requested changes, backed up by evidence and technical information. Also to hold a properly informed non statutory consultation to the residents of every parish affected by the scheme proposals.

The non statutory consultation held in July 2019 was advised to some 10,000 homes by way of a booklet in the affected scheme area, and in Sept/Dec 2020 the Statutory Consultation booklet was sent to some 11,000 homes. In 2019 numerous exhibitions were held in village hall locations, This was not possible to repeat in 2020 due to Covid rules.

This non-statutory consultation has not been run on the same lines as the 2019 consultation despite the fact the implications of the changes will affect all 11,000 homes. What we have seen is only a few consultation booklets sent to selected homes, and only 2 event locations namely Burwell and Chippenham in East Cambs with none in West Suffolk.

The recommendations of the planning Inspectorate to Sunnica Ltd was to hold a "Public Meeting" not an event.

I attended the event at Chippenham Village hall on the 23rd June. A member of the team from AECOM tried to assist me with my questions on Option 3, the substations and the shunt reactors. I regret to say he was incompetent, gave wrong answers to my questions of which I already knew the answers having studied the booklet prior to my visit. There was nothing new at the event only banners as a copy of the booklet details. I expected a model of the BESS/substation sites or at least a computer generated image of what to expect.

I was told that there was only 1 shunt reactor for the Option 3 scheme, sited at Elms Road, the guy did not know why this site had been chosen and did not know anything about any added noise from that piece of equipment.

If what he said is true that means 16km of 400KW cable which differs from previous correspondence that the only BESS / substation affected was at Sunnica West close to la Hoque.

This proved to me a public meeting as recommended by the planning inspectorate should have been organised on the same lines as the recent one at Red Lodge, chaired by Luke Murray and supported by one member of AECOM.

When the DCO was sent to the Planning Inspectorate in November 2021 Sunnica had NOT obtained a signed agreement with National Grid for a connection to the National Grid sub station at Burwell.

Sunnica had only made assumptions. It does not matter how extensive negotiations had been with NG, the fact is there was no written agreement when the DCO was submitted. Therefore there was a risk.

Sunnica Ltd only has its directors to blame for submitting a DCO for a NSIP with a huge capital cost to The Planning Inspectorate in Nov 2021 incomplete with the key element of a connection to the national grid not legally binding by way of a signed contract.

The changes presented at this consultation are once again based on assumption and not material fact and therefore make a nonsense of what is being presented to the planning Inspectorate and the public.

- **Option 1** is out.
- **Option 2** is said to entail compulsory purchase as there is unlikely to be an amicable negotiation with the landowner. Therefore Sunnica has to issue a threat to a landowner to obtain this option. Ultimately it will be for The Secretary Of State to determine if Sunnica Ltd has produced a robust enough Funding Statement to pay for any compulsory purchase.
- **Option 3** is once again at the mercy of the National Grid with no guarantee they will agree, nothing confirmed in writing by way of a signed contract.
- But even more alarming it is not known if **option 2 and 3** is technically feasible.

Therefore to summarise, I have given the reasons for these changes to the DCO, that must not be agreed by The Planning Inspectorate, and the application at this stage should be withdrawn;

- until such time as signed documents are available for a connection to the grid at Burwell,
- all technical electrical specifications have been agreed by experts as feasible;
- all 11,000 homes have been informed of any changes to the DCO by receiving a booklet;
- and with an event at every village location within the scheme boundary as per 2019.

Yours faithfully

Alan B Smith

Jo Cant

Dear Sunnica

I have read your online consultation booklet about the changes to your scheme. You mention that Option 2 requires compulsory purchase, but this is unlikely to be obtained. If the new option 3 isn't feasible, what option are you left with if you no longer have Option 2 (or 1)? Are there other parts of the scheme that will require compulsory purchase or have these all been removed? If compulsory purchase is required elsewhere, what happens if you don't get this either?

I find the proposed changes confusing and unsatisfactory. You may end up with a scheme that can't plug its energy into the Grid. How will this work?

Why haven't the various grid options all been reviewed earlier in the design process? I don't understand why these late changes are needed when you told us that you had an agreed grid connection. I cannot comment further about the changes as I just find it too confusing and the booklet doesn't explain it well at all. Please can you provide more detailed information in an easy to understand format so that I can better assess these changes?

regards,

Jo Cant

Edward Keymer

Dear Sirs

I note that your original application was worked up in good faith with NGET. It is not the Applicant's fault that NGET gave inaccurate advice that at the end of the day proved an undeliverable Grid Connection. It is after all NGET's speciality and they should give correct information.

I see you now propose using u/g 400Kva cabling to connect transformers on the various generating sites back to Burwell. It is my view that neither the extra transformers, nor the heavier underground cabling will have a material effect on stakeholders.

As such it would seem wholly equitable that the Inspectorate permit the first application to be amended.

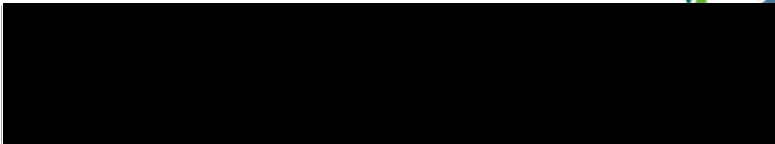
Please advise if I have misunderstood your proposals

Kind regards

Cambridge & Peterborough Combined Authority (CPCA)

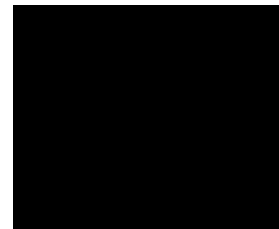


**CAMBRIDGESHIRE
& PETERBOROUGH**
COMBINED AUTHORITY



Sunnica Project Team

Your ref: Public Consultation



Dear Sir/Madam,

Consultation on proposed changes

I am writing on behalf of the Combined Authority in response to your consultation on proposed changes to the DCO application as summarised below:

Change 1: To remove the Burwell National Grid Substation Extension Option 1 from the Scheme.

Change 2: Option to be added to the Application to enable the use of 400kV cabling within the grid connection routes A and B.

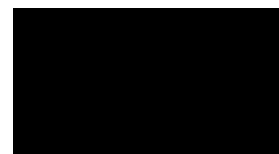
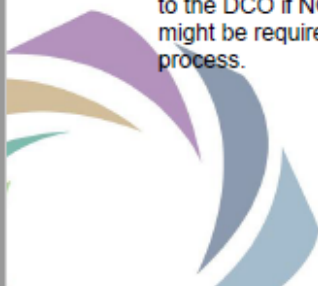
Change 3: Option to allow for additional electrical infrastructure to be added to the substations referred to in the Application at Sunnica West A, Sunnica East A and Sunnica East B.

The three changes are related and the following comments are considered relevant to these changes:

The proposed removal of Option 1 in Proposed Change 1 means that Option 3 must be a viable option to provide a sufficient alternative test to the requirement of compulsory purchasing land in Option 2. Option 3 requires the use of 400kV cabling from the site to Burwell. The Applicant's letter to the Examining Authority of 28th April states: "*Option 3 was considered prior to the Application being submitted but it was previously determined that it was preferential to have two 132kV circuits rather than a single 400kV circuit to mitigate the effect of failure in a single 400kV circuit. Sunnica now considers that the risk profile of failure of a single 400 kV circuit is acceptable and therefore is willing to proceed with the connection type.*"

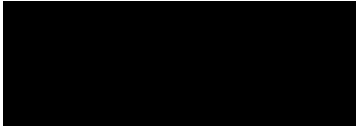
The Proposed Changes consultation documentation is deficient in that it does not address this risk issue at all, neither explaining the previously assumed risk, or the change in circumstances (beyond the removal of Option 1) that led to the change in acceptable risk profile.

Change 1 is subject to NGET "*substantiating its claim in its relevant representation which stated that Option 1 is 'not technically feasible' "*. It is not set out what further changes might be required to the DCO if NGET cannot substantiate this. It might be assumed that compulsory purchase might be required if NGET as landowner is unwilling to proceed. This adds uncertainty to the process.



The Applicant will need to demonstrate that risk has been appropriately assessed, that Option 3 is a viable alternative, and whether the public consultation process has been adequately undertaken in light of these comments.

Yours Sincerely,



Adrian Cannard
Strategic Planning Manager



Environment Agency



Mr Luke Murray
Sunnica Ltd
Unit 2 Crossways Business Park Bicester
Road
Kingswood
HP18 0RA

Our ref: AC/2022/130910/02-L01
Your ref: *
Date: 24 June 2022

Dear Mr Murray

**SUNNICA ENERGY FARM DCO
SUNNICA WEST A & B NEAR CHIPPENHAM AND SNAILWELL IN
CAMBRIDGESHIRE. SUNNICA EAST A NEAR ISLEHAM IN CAMBRIDGESHIRE
AND SUFFOLK, SUNNICA B NEAR WORLINGTON AND FRECKENHAM IN
SUFFOLK**

Thank you for consulting us on the proposed changes to the above DCO application.

We have reviewed the submitted Consultation Booklet on the proposed changes to the Sunnica Energy Farm DCO and wish to make the following comments:

If option 3 is added to the DCO application then a revised Flood Risk Assessment (FRA) or FRA Addendum will need to be submitted to assess the flood risk impacts of the proposed changes relating to this option. In particular, the consultation booklet indicates that option 3 would require changes to the proposed layout of the substations and transformers at Sunnica West Site A, Sunnica East Site A and Sunnica East Site B. This could result in changes to the proposed built footprint within the floodplain. As detailed in issue 1.2 of our Relevant Representations, the FRA needs to demonstrate that any built footprint within the floodplain can be compensated for to ensure there is no increase in flood risk elsewhere.

As option 2 is going to be retained in the DCO application and would involve an extension at Burwell Substation, issue 1.1 of our Relevant Representations is still considered to be relevant and needs to be addressed.

Please note that we are also still awaiting information to address issues 1.3, 1.4 and 1.5 of our Relevant Representations. This information will also need to be included in any revised FRA or FRA Addendum.

We strongly recommend that the additional information required to address the issues we have raised is provided as soon as possible to avoid any unnecessary delays at the Examination stage.

We hope this information is of assistance. If you have any queries, please do not hesitate to contact us.

Yours sincerely

Environment Agency
Bromholme Lane, Brompton, Huntingdon, PE28 4NE.
Customer services line: 08708 506 506
Email: enquiries@environment-agency.gov.uk
www.environment-agency.gov.uk
Cont/d..

Alison Craggs
Sustainable Places Planning Advisor



End

2

Peter Knowles

FAO Sunnica Energy Farm
Freepost
SEC NEWGATE
UK LOCAL

Date 27.6.2022

Dear Mr Murray,

I received your letter dated 13 June 2022, addressed to The Resident, dated 7 days after the start of your consultation period and why is your postal address not included in this letter?

It advises of **only two places** where interested parties can ask questions and view your amended plans namely **Mandeville Hall Burwell 22 June 3.30pm to 7.30pm and Chippenham Village Hall 23 June 2.30pm to 6.30pm**, a further 6-7 days after the start of your consultation period and only 14 and 13 days respectively before the end on 6th July 2022.

I OBJECT to the lack of viewing options of your proposed changes, the time scale of the consulting period, you proposed to the Planning Inspectorate, i.e. 6 June 2022 to 6 July 2022 this does not give enough time.

Your scheme covers a large area that does not enjoy public transport to enable interested parties, without internet access or own transport, to view your amended plans.

The residents in **all the places** your scheme affects should have the opportunity to view and comment on your amended plans, having it in just two locations **deprives those without independent means this opportunity, so fragmenting a fair consultation.**

With reference to your statement included in your letter to the Planning Inspectorate:

"We are additionally organising an event where people will be able to ask questions about these changes, and will publicise further details in due course".

At the stage when it was known when and where you were holding face to face questions and answers sessions in **the affected areas of your whole scheme**, it should have been at this time to determine the consultation period start and finish dates!!! Not midway through the consultation period.

Why did you make the arrangements in this way?

On your display at Chippenham Village Hall, you state, *We are making these changes because we want to minimise unacceptable impacts to the local community and environment as a result of the scheme.* Your proposed scheme already creates unacceptable impacts to local communities and environments, so contradicting your statement!

What is the difference between a shunt station and a transformer?

I am not clear why option 3 is now being considered, having been removed following the statutory consultation.

How does the option 3 being considered now, different from the original?

Why are there still so many ifs and buts regarding Options 1, 2 and 3?

Without a clear understanding I am unable to constructively comment, so will you please clarify the now situation and answer the other questions and points I have raised. Thank you in anticipation.

Yours faithfully,

Peter Knowles

Brenda Knowles

FAO Sunnica Energy Farm
Freepost SEC
NEWGATE UK LOCAL

28th June 2022

Dear Mr Murray,

The consultation period proposed was from 6th June and yet my letter, telling me about the consultation and inviting me to view the amended plans was not written, until a week later, and the opportunity to view the plans was 16 days into the supposed consultation date. I find this very poor practice. I also object to the fact that the plans were only on view at two of the locations and not in every village affected, not everyone has internet access or transport to be able to attend a viewing in another village. Furthermore, by having the viewings on consecutive days you have limited even further the possibility for people, unable through illness, holidays or business commitments during those two days, to be able to view the plans.

In fact the whole 4 weeks consultation for those who wanted/needed to view the plans, boiled down to two days viewing, in two locations, held 13/14 days before the end of the consultation period.

Therefore I question your statement that you are consulting on these changes "between 6th June and 6th July".

You state that Option 1 is not now Technically Feasible so why is it still Option 1?

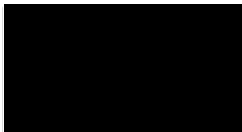
"The representation" has suggested that you take forward Option 2 which "would likely" require the compulsory acquisition of land from a third party

You still have to confirm that Option 3 is technically feasible.

The whole consultation appears to be based on ifs and buts

Surely it would be wiser to confirm just what the true options are before you waste any more of your, and our, time and money on consultations that are based on may-be's. We could then perhaps have a clear view of just what we are being consulted on

Yours faithfully,



Brenda Knowles



Lucy Frazer MP and Matt Hancock MP

Mathew Hazell & Marcus Murray
Directors Sunnica Energy Farm Limited
2 Crossways Business Centre Bicester Road
Kingswood
Aylesbury
Buckinghamshire
HP18 0RA

6 July 2022

Dear Mr Hazell and Mr Murray,

**Planning Act 2008 (as amended) Application by Sunnica Ltd for Development Consent for the Sunnica Energy Farm
Consultation on Proposed Grid Connection Alternative Options**

We are writing to you in response to Sunnica Ltd.'s non-statutory consultation on proposed changes to its options for connecting to the National Grid electricity transmission system.

Many of our constituents have shared concerns relating to the extent of information available about the proposed substations in "Option 3". It is our impression that many of Sunnica Ltd.'s assessments of 'Option 3' are incomplete – for instance, relating to noise, traffic, changes to landscape, safety, security and decommissioning. This makes it impossible for our constituents to assess the impact of these changes. It also means we must reserve judgement on Sunnica Ltd.'s claim that the proposed changes are 'non-material', which was asserted in the introduction of your consultation document.

Concerns have also been raised about the quality of information contained in the consultation document. While there is a written summary of the proposed changes, we note that there is no visual representation of the substations. In addition, there is a lack of detail about the potential change to the cables, which affects the entire scheme. It is apparent from the consultation document that these cables would be slightly larger, but details concerning size, heat output and installation are missing. Again, this makes it impossible for our constituents to adequately assess the impacts of the changes.

We welcome the willingness of Sunnica Ltd. to hold in-person sessions for this consultation, but were disappointed that you did not decide to consult residents in Suffolk. This is despite the significant planned development of Battery Energy Storage System compounds at Sunnica East Site A and Sunnica East Site B, which are both stationed in the county.

Some constituents would also have welcomed more notice ahead of the exhibition events in Chippenham and Burwell, especially because they commenced during the afternoon and finished in the early evening. It is our understanding that many of the letters introducing the exhibitions were only received on 15 July 2022, which was just a week in advance, and one week into the consultation.

We would be grateful if you would please consider the above points before you request to make changes to your application to the Examining Authority.

Yours sincerely,

Lucy Frazer MP and Matt Hancock MP

Health & Safety Executive

Luke

In response to your hard copy letter addressed to Sarah Albon Chief Executive dated 2nd June 2022 I can confirm that HSE have no further comment to make on the proposed changes to the Development Consent Order. Our advice remains the same as that given in previous responses to the EIA Scoping Opinion, the S42 Application and the S56 notification (attached for your reference).

I can also advise that our Electrical Specialists have no comment to make.

Could I please ask you to ensure that any future correspondence is directed by email to the following dedicated email account to ensure prompt attention and appropriate response : NSIP.Applications@HSE.gov.uk

Kind Regards

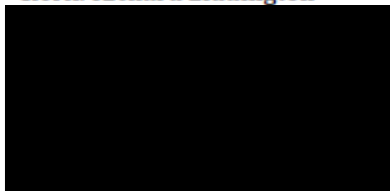
Allison



NSIP CONSULTATIONS
| HSE CEMHD 4

ISLEHAM PARISH COUNCIL

Clerk: Richard Liddington



Sunnica Consultation – June 2022

We would welcome the opportunity to constructively respond to your proposals but deem this exercise as yet another half-hearted (quasi) attempt at consultation which we believe deliberately excludes many interested parties and fails to show any understanding of the strength of feeling towards this project in general and these proposals in particular. In particular:

- The Booklet:
 - o was not automatically sent to the vast majority of interested parties. You rely on people having internet access to order the booklet and gain any knowledge and understanding of your latest proposals. We know from our own surveys that this is simply not the case.
 - o provides very little detail. For example the booklet contains only nominal impact statements or assessments on issues such as visibility, new cabling routes, noise or changes to construction traffic, changes to effectiveness or technical details regarding the size and nature of items such as the new stunt reactors
- Public Exhibition
 - o Sunnica representatives were clearly embarrassed by the proposals and ill prepared for the depth of feeling and questions being raised by attendees
 - o You state that the locations for these meetings were targeted at just the two most affected parishes. By this you fail to recognise that:
 - all parishes will be affected by these changes, especially in issues such as construction traffic. Your own booklet states: "This review has led us to explore a different option - Option 3. This option would require amended substation and transformer arrangements at Sunnica West Site A, Sunnica East Site A and Sunnica East Site B alongside a shunt reactor at Sunnica East Site B. Yet no meetings were held in Isleham
 - public transport is virtually nil in many of our communities so further restrict engagement of interested parties not living in Chippenham or Burwell
 - the main exhibition periods provided no opportunity for interested parties to engage in meaningful dialogue, which in the case of Isleham residents reflects Sunnica's complete refusal to engage in face-to-face meetings with us!
 - there is genuine unity among the various parishes and action groups. This stinks of divide and rule!

This exercise fails to show any awareness or understanding of the bigger issues affecting our local communities regarding this project and it is simply impossible to submit a response to this consultation based on the information shared with us to date.

Absolutely none of our previously identified objections to this project have been addressed. Is it therefore surprising that we view this latest round of consultation with anything other than suspicion!?

Local Authorities Joint Response



Cambridgeshire
County Council

West Suffolk
Council



Suffolk
County Council

Date: 6 July 2022

Enquiries to: Andrew Phillips David Carford Julie Barrow Isaac Nunn

To Sunnica

By email: info@sunnica.co.uk

Dear Sirs,

Sunnica Energy Farm - Consultation on proposed changes

This letter is the joint response of West Suffolk Council, Suffolk County Council, East Cambridgeshire District Council and Cambridgeshire County Council (referred to as "the Councils" in this response) to Sunnica's consultation on proposed changes to the Sunnica Energy Farm scheme. Unless it is identified otherwise in specific sections, the Councils share the views on matters within this response.

General points

The consultation material states that Sunnica believes that the proposed changes are 'non-material and will reduce environmental effects from the scheme'. The Councils consider that insufficient information has been presented at this stage to establish whether the proposed changes are material or non-material. Sunnica correctly state that this is a matter for the Examining Authority to decide and the Councils concur with this view.

In general, the Councils consider that insufficient information has been provided as to the nature of the changes and their resultant impacts. The use of technical jargon and references to items such as shunt reactors and busbars does not aid the reader to understand what the implications of their inclusion in the scheme are.

The consultation material does not categorically state whether Option 3 is technically feasible. The Councils question whether further consultation will be necessary once this has been established.

The consultation material does not provide any information in relation to any changes that will be required to the framework control documents that accompanied the application as a result of the changes to the scheme. The Councils require this information in order to be able to fully consider the changes.

The Councils wish it to be noted that the matters raised in their respective Relevant Representations submitted in March 2022 remain valid and that there are no changes to them as a result of this consultation.

Highway matters

It is unclear what impact the changes will have on haulage routes. For example, will the changes to the substations at Sunnica West A, Sunnica East A and Sunnica East B require additional and/or larger equipment to be delivered to site than would have been expected under the original scheme? If so, how will this be facilitated? Equally, are there to be any additional maintenance and associated journeys to the above sites during operation?

Landscape and visual impact

The consultation material indicates that while there is additional infrastructure proposed at the substations at Sunnica West A, Sunnica East A and Sunnica East B, the substations would not be any larger than already proposed. On this basis the landscape and visual effects and the requirements for mitigative and compensatory planting would be unchanged. However, as previously stated, the Councils consider that further information is required to fully understand the impacts (if any) of the proposed changes and as such the Councils may reach a different view.

From the information provided it is not clear what the implications of changes to the cables (moving from 4 x 137kV cables to a single 400kV) would be in terms of the trenches. Without details of the footprint and depth of the trenches the Councils are unable to assess the impact this might have on loss of vegetation as a consequence. The Councils have previously highlighted that the information on loss of trees and hedges in relation to the cable route is insufficient within the application.

Ecology

There is insufficient evidence to determine whether the changes proposed under Option 3 are “non material and will reduce environmental effects from the scheme” as stated by the applicant. If a modified application is submitted, we expect adequate evidence to demonstrate this will be the case, and that all documents to be updated accordingly (including EcIA, landscape plans, CEMP and LEMP etc.). For example, there are concerns relating to the cable route and hydrological implications, such as at Chippenham Fen, and directional drilling beneath the water courses associated with Havacre Deal and Nook CWS.

It is not clear from the information available whether changes associated with the onsite substations may result in increases to staffing, noise, traffic and other disturbance. We would therefore expect adequate evidence to demonstrate the proposed changes will not alter the magnitude of impact / significance of effect

of the scheme on biodiversity including on Stone Curlews as set out in Chapter 8 of the Environmental Statement [APP-040].

Noise and vibration

With reference to the Pinsent Masons letter of 28 April 2022 to the Examining Authority, it is stated at Para 3.7 ".....We do not expect there to be any adverse effects on the environment beyond those identified in the Application already.....". Para 3.13 states "The need for additional baseline surveys: None."

To date the Councils have not been satisfied by the information provided by Sunnica regarding either the baseline noise assessments or the assessment of adverse amenity impacts during the operational phase. There is therefore no confidence in the above statements.

The consultation material indicates a change to the electrical infrastructure due to the introduction of 32/400kV transformers at substation locations within Sunnica East Site A and Sunnica East Site B and Sunnica West Site A and the proposal for the installation of a shunt reactor at Sunnica East Site B.

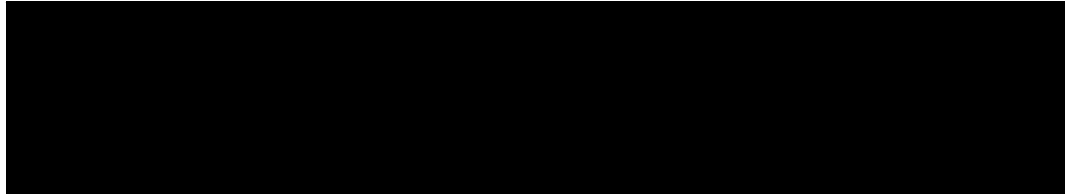
To date no specific information has been provided by Sunnica regarding assessments of noise and vibration from these substations/transformers. Particularly, but not exclusively, the Councils are concerned that during operation shunt reactors are liable to relatively high sound levels at low frequencies. It will be necessary for information to be provided regarding the specification, design, sound mitigation and exact locations of all substation equipment (including the proposed shunt reactor) and reports by competent and suitably qualified parties regarding the effects on receptors and necessary mitigation measures.

Consultation process

In its letter of 26 May 2022 the ExA suggested that Sunnica consider holding a public meeting as part of the consultation. Two 'public exhibition' events have been proposed by Sunnica, however, both are located in Cambridgeshire despite the changes also affecting sites in Suffolk. A public exhibition differs from an open public meeting, which is likely to attract a higher level of participation.

Sunnica communication consultants, SEC Newgate UK Ltd, contacted the Councils and provided a copy of the exhibition invite letter. In their communication it was stated that the letter was being posted to the same zone that received booklets during the statutory consultation. However, Sunnica's Method Statement for this consultation states that Sunnica will be writing to approximately 140 homes and businesses. There appears to be a significant difference between the two geographic areas that have been written to. This is likely to have led to confusion in the community.

Regards,



Andrew Cook,
Executive Director,
Growth & Highways
Infrastructure,
Suffolk County Council

Steve Cox,
Executive Director,
Place and
Economy
Cambridgeshire
County Council

Sally Bonnett,
Director
Community
East
Cambridgeshire
District Council

Julie Baird,
Director,
Planning &
Growth, West
Suffolk Council

Natural England

Date: 04 July 2022
Our ref: 395636



BY EMAIL ONLY



Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Sir / Madam

Sunnica Energy Farm: Consultation on proposed changes to a Development Consent Order (DCO) application

Thank you for your consultation on the above dated 02 June 2022 which was received by Natural England on 06 June 2022.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

We provide the following comments on this proposed amendment to the Development Consent Order:

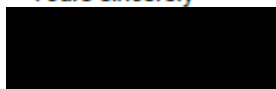
Although the consultation document states that the proposed changes will result in the works being "similar to those currently reported with the Environmental Statement", we request further information in relation to Changes 2 and 3.

- What changes will there be to transportation movements across the sites during the construction phase due to Changes 2 and 3, and consequent changes to emissions from vehicles which may impact designated sites sensitive to air pollution close to the Affected Road Network?
- What will be the impact of Change 3 on levels of disturbance to Stone Curlew in and close to Sunnica East Sites A and B as a result of changed staff and vehicle movements, and changes to the timings or duration of works?

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely



Richard Hack
Norfolk & Suffolk Team

Network Rail

Dear Sir / Madam,

Sunnica Energy Farm Development Consent Order (DCO) – Consultation Response to Proposed Changes (Network Rail)

We act on behalf of Network Rail in relation to the Sunnica Energy Farm DCO and have received the consultation booklet and cover letter dated 2nd June 2022.

We have reviewed the consultation booklet and understand that of the three proposed changes, only Change 2 might impact on Network Rail's assets. Change 2 enables Sunnica Ltd to use 400kV cabling within grid connection routes A and B.

The consultation booklet states that by using 400kV cables, fewer but larger cables will need to be installed.

We understand that grid connection route B is currently proposed to run underneath the Anglian railway line.

As such Network Rail is reviewing the proposed changes and we will revert with further comments if necessary in due course.

Yours sincerely,

Sam Lisle

National Grid

nationalgrid

Our ref: 342777.000057
6 July 2022

FAO: Sunnica Energy Farm
Freepost SEC
NEWGATE
UK LOCAL

By email only to: info@sunnica.co.uk

Dear Sirs

Response to the Consultation on proposed changes to the Sunnica Energy Farm Development Consent Order

National Grid Electricity Transmission Plc ("**NGET**") write in connection with the above Development Consent Order ("**DCO**") and in response to the Consultation on the Proposed Changes to the DCO ("**Consultation**") bought forward by Sunnica Ltd (the "**Promoter**").

As confirmed in NGET's Relevant Representation of 17 March 2022, the Option 1 connection to the NGET Burwell Substation included in the current DCO application is not technically feasible due to:

- the amount of land required by the Promoter to carry this Option forward;
- the planned extension of the Burwell Substation; and
- NGET's license obligations.

Therefore NGET fully supports the removal of Option 1 from the DCO application along with the associated modifications.

NGET has reviewed the Option 3 connection proposed by the Promoter for inclusion in the revised DCO application. This new Option is described in detail in the Promoter's letter of 28 April 2022 and in the booklet issued by the Promoter in connection with this Consultation. NGET are supportive of the addition of the Option 3 connection in principle (pending formal written approval of the technical feasibility of Option 3 by NGET) and invites the Promoter to enter into discussions with the relevant NGET engineers in order to facilitate written confirmation of technical feasibility in relation to Option 3.

As previously advised, as a responsible statutory undertaker, NGET's primary concern is to meet its statutory obligations and to ensure that any development does not impact in any adverse way upon those statutory obligations. As such, NGET reserves the right to make further representations as part of the examination process but in the meantime NGET remains committed to working with the Promoter in relation to the inclusion of new Option 3 within the DCO application (alongside the existing Option 2) and to provide the Examining Authority with any further information that they may require during the examination process.

Yours Faithfully

National Grid Electricity Transmission Plc

Parish & Town Councils' Alliance

Dear Sirs

We are responding to your consultation on the options to make a grid connection to the National Grid substation at Burwell.

The consultation material provided contains insufficient information to be able to comment on the changes as we cannot assess, based on the information provided, the impact of the change on local residents and the local environment.

Public Meetings were held by Sunnica in two Parishes - Burwell and Chippenham. We would make the following comments on these meetings:

1. The meetings were held at short notice. The advertising of the meetings was poorly done and local awareness was low. Sunnica relied on the Parish and Town Councils to do most of the advertising.
2. The Parish and Town Councils were not give any information as to how the Sunnica had communicated with the Local communities. Some had booklets, some emails, some letters, but the process of selection as who had what was not clear.
3. The banner supplied to advertise the meeting at Chippenham only arrived on the 22nd June.
4. The timing of the Chippenham Public Meeting was from 2.00pm to 6.30pm, making it difficult for working people to attend without taking time off work. All Parish Council meetings are held at 7.00pm allowing people to attend after work.
5. The format without a Questions and Answer session was unhelpful. People learn from hearing other questions answered.
6. A number of the Sunnica Team were unable to answer the questions asked. For example how will the layout of the areas be affected by the changes. What selection criteria was used to decide who received what communication from Sunnica.
7. The pictorial evidence provided at the meetings was weak. Cross sections on height and appearance were not clear or put up on the display boards.

In view of the above we are reserving our position as to whether or not this is a material change. We have not been provided adequate information to make any decision.

Yours faithfully

Fiona Maxwell

Chair, Parish & Town Councils' Alliance - Sunnica Group

Representing:

Chippenham Parish Council, Snailwell Parish Council, Isleham Parish Council, Fordham Parish Council, Freckenham Parish Council, Worlington Parish Council, West Row Parish Council, Reach Parish Council, Exning Parish Council, Red Lodge Parish Council, Mildenhall High Town Council, Newmarket Town Council.

Reach Parish Council

Dear Sunnica,

I am writing to you on behalf of Reach Parish Council in respect of the proposed changes to your application to the Planning Inspectorate.

Regrettably we judge that there is insufficient information in the public domain on which to assess the impacts of the proposed changes, particularly in terms of visual intrusion and noise especially in the locality of Weirs Drove where, in our view, the information associated with the proposed changes brings confusion rather than clarity.

Yours sincerely,

Nick Acklam
Acting Chair, Reach PC

Feedback Form (1)

**CONSULTATION FEEDBACK**

6 June 2022 to 6 July 2022

Sunnica Ltd is consulting on its proposed changes to its Development Consent Order (DCO) application.

This consultation is your opportunity to express your views on our proposed changes before we submit a change application to the Examining Authority.

How to respond to this consultation

You can respond to the consultation by:

- Writing your views below and returning this form to: **FAO Sunnica Energy Farm, Freepost SEC NEWGATE UK LOCAL**
- Writing your views below, scanning or photographing the form and returning it by email to **info@sunnica.co.uk**
- Writing to us directly using the email address or Freepost address above

Responses must be received by Sunnica Ltd by 11:59pm on Wednesday 6 July 2022.

Any elements of responses that refer to aspects of the Scheme that are unrelated to the proposed changes will be disregarded by the project team.

Please write your comments on the proposed changes below:

I ONLY WANT TO LOOK AT THE
CHANGES THAT AFFECT BURNWELL AREA
WHICH SEEM TO BE MINOR FROM A
PUBLIC POINT OF VIEW. IT WILL SAVE
A VAST AMOUNT OF WORK AT BURNWELL
SUB-STATION.
AS A WHOLE THIS SYSTEM IS REQUIRED
TO MAKE ELECTRICAL SUPPLY
SECURE.

[illegible]

Please only provide the below details if you wish to.

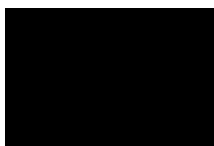
Name:

Address:

Telephone:

Email address

Our privacy policy: Your comments 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 your comments can be considered as part of the Development Consent Order (DCO) application process. We will request that your personal details are not placed on public record and will be held securely by Sunnica Ltd in accordance with the data protection law and will be used solely in connection with the consultation process and subsequent Examination and application process and, except as noted above, will not be passed to third parties.



Guss Jones

**CONSULTATION FEEDBACK**

6 June 2022 to 6 July 2022

Sunnica Ltd is consulting on its proposed changes to its Development Consent Order (DCO) application.

This consultation is your opportunity to express your views on our proposed changes before we submit a change application to the Examining Authority.

How to respond to this consultation

You can respond to the consultation by:

- Writing your views below and returning this form to: **FAO Sunnica Energy Farm, Freepost SEC NEWGATE UK LOCAL**
- Writing your views below, scanning or photographing the form and returning it by email to **info@sunnica.co.uk**
- Writing to us directly using the email address or Freepost address above

Responses must be received by Sunnica Ltd by 11:59pm on Wednesday 6 July 2022.





Any elements of responses that refer to aspects of the Scheme that are unrelated to the proposed changes will be disregarded by the project team.

Please write your comments on the proposed changes below:

We want £20,000 which is
direct from the full
amount that is directly
paid each year to Burwell.



Please only provide the below details if you wish to

Name: 
 Address: 
 Telephone: 
 Email address: 

Our privacy policy: Your comments 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 your comments can be considered as part of the Development Consent Order (DCO) application process. We will request that your personal details are not placed on public record and will be held securely by Sunnica Ltd in accordance with the data protection law and will be used solely in connection with the consultation process and subsequent Examination and application process and, except as noted above, will not be passed to third parties.

0808 168 7925
info@sunnica.co.uk
www.sunnica.co.uk

Feedback Form (2)**CONSULTATION FEEDBACK**

6 June 2022 to 6 July 2022

Sunnica Ltd is consulting on its proposed changes to its Development Consent Order (DCO) application.

This consultation is your opportunity to express your views on our proposed changes before we submit a change application to the Examining Authority.

How to respond to this consultation

You can respond to the consultation by:

- Writing your views below and returning this form to: **FAO Sunnica Energy Farm, Freepost SEC NEWGATE UK LOCAL**
- Writing your views below, scanning or photographing the form and returning it by email to **info@sunnica.co.uk**
- Writing to us directly using the email address or Freepost address above

Responses must be received by Sunnica Ltd by 11:59pm on Wednesday 6 July 2022.

Any elements of responses that refer to aspects of the Scheme that are unrelated to the proposed changes will be disregarded by the project team.

Please write your comments on the proposed changes below:

I am very interested in the prospective community fund. often District/county money does not Thistle down. SCIENCE EDUCATION A MUST!

Feedback Form (3)

**CONSULTATION FEEDBACK**

6 June 2022 to 6 July 2022

Sunnica Ltd is consulting on its proposed changes to its Development Consent Order (DCO) application.

This consultation is your opportunity to express your views on our proposed changes before we submit a change application to the Examining Authority.

How to respond to this consultation

You can respond to the consultation by:

- Writing your views below and returning this form to: **FAO Sunnica Energy Farm, Freepost SEC NEWGATE UK LOCAL**
- Writing your views below, scanning or photographing the form and returning it by email to **info@sunnica.co.uk**
- Writing to us directly using the email address or Freepost address above

Responses must be received by Sunnica Ltd by 11:59pm on Wednesday 6 July 2022.

Any elements of responses that refer to aspects of the Scheme that are unrelated to the proposed changes will be disregarded by the project team.

Please write your comments on the proposed changes below:

We have no strong objections to either plan 2 or 3 (though obviously plan 3 seems preferable). We are very aware of the need for more electricity, and accept that this development is necessary. We realise that there will be a period of disruption while the work proceeds and expect all efforts will be made to minimize this. We would like to see as much

Screening as possible to be provided!
Also appreciate very much the land set aside for stone curlew!!

Say No to Sunnica

Say No To Sunnica Action Group Ltd

Badlingham Farm, Chippenham, Ely, Cambridgeshire, CB7 5QQ



4 July 2022

Dear Sirs,

Planning Act 2008 (as amended)

Application by Sunnica Ltd for Development Consent for the Sunnica Energy Farm

Consultation on Proposed Grid Connection Alternative Options

We are responding to your consultation on the options to make a grid connection to the National Grid substation at Burwell.

The consultation material contains insufficient information to be able to comment on the changes as we cannot assess, based on the information provided, the impact of the change on local residents and the local environment.

This is the view of many people locally. We are disappointed with the limited information provided and the extent of consultation in terms of restricted distribution of booklets and only 2 public meetings and that no public meetings were held in Suffolk despite two of the areas of change indicated in your consultation material being in Suffolk.

We are reserving our position as to if this is or is not a material change until better details have been provided and that this important question cannot be determined on the information available as it is totally inadequate.

Yours sincerely

Dr C Judkins (Chair)

Electronically signed.



Snailwell Parish Council

Response to Consultation on Proposed Changes – closing date 6th July 2022

From Snailwell Parish Council

We are responding to your consultation on the options to your proposed grid connection to the National Grid substation at Burwell.

The consultation material provided contains insufficient information to be able to comment on the changes as we cannot assess, based on the information provided, the impact of the change on local residents and the local environment.

Public Meetings were held by Sunnica in two Parishes - Burwell and Chippenham. We would make the following comments on these meetings:

1.

1. The meetings were at short notice. The advertising of the meetings was poorly done and local awareness was low. Sunnica has put significant reliance on the Parish Councils to do the advertising.
2. The Parish and Town Councils were not give any information as to how Sunnica had communicated with the Local communities. Some had booklets, some emails, some letters, but the process of selection as who had what was not clear.
3. The banner supplied to advertise the meeting at Chippenham only arrived on the 22nd June.
4. The timing of the two Public Meetings 2.00pm to 6.30pm making it difficult for working people to attend without taking time off work. Parish Council meetings are generally held at 7.00pm allowing people to attend after work.
5. The format without a Questions and Answer session was unhelpful. People learn from hearing other questions answered.
6. A number of the Sunnica Team were unable to answer the questions asked. For example how will the layout of the areas be affected by the changes. What selection criteria was used to decide who received what communication from Sunnica.
7. The pictorial evidence provided at the meetings was weak. Cross sections on height and appearance were not clear or put up on the display boards. The equipment in these drawings seem to effectively increasing the size and doubling up on your largest components which will surely have an impact on our rural roads. You confirmed that you only showed this information at your two roadshows in Chippenham and Burwell. The vast majority of the community would not have access to this significant change. No further mitigation or explanation has been put forward by Sunnica during this sham of a consultation.
8. It is clear that as a direct consequence of the extra land requested by Sunnica at Burwell Sub Station, NGET had to declare in their Relevant representation that this was not technically feasible.

In view of the above we are reserving our position as to whether or not this is a material change. We have not been provided adequate information to make the decision.

Yours faithfully

Peter Moggridge

Chair Snailwell Parish Council

Members of The Parish and Town Council's Alliance

Suffolk Wildlife Trust

Our comments on this consultation are as follows:

The consultation states that the proposed changes will not require any further environmental assessment as the works “are therefore considered to be similar to those currently reported with the Environmental Statement”.

We would like to seek assurance in relation to Change 2 as to whether there could be an effect on hydrology from installing a 400kV cable, with potential implications for Chippenham Fen SSSI, County Wildlife Sites, peat soils and directional drilling under watercourses. For instance, would a single trench for 400kV need to be larger, deeper and require more jointing bays?

We would like to seek assurance in relation to Change 3 as to whether the risk of disturbance to birds might increase if the changes would result in:

additional staff needed during construction

additional vehicle movements or other sources of noise disturbance during construction

changes to timing or duration of works

changes to the maintenance regime

If a modified application is submitted, we would expect all documents to be updated accordingly, including the EcIA, landscape plans, CEMP and LEMP.

We were due to have an Ecology Advisory Group meeting of with the environmental consultants, AECOM, on 10 June but this was postponed because of staff illness. We should like to request that the changes proposed should be discussed at that meeting when it is rearranged.

Many thanks,

Gareth Dalglish
Ecology and Planning Advisor

[Redacted signature]

Worlington Parish Council

From: Worlington Parish Council, part of the Parish Alliance and in full support of the Action Group.

Planning Act 2008 (as amended)

Application by Sunnica Ltd for Development Consent for the Sunnica Energy Farm

Consultation on Proposed Grid Connection Alternative Options

The consultation as we feared was entirely rushed and inadequate and it has left us feeling that there are far too many unanswered questions.

At this point with the information provided by yourselves we are unable to make a fair assessment on the impact to our residents and environment.

Our last parish meeting was the 16th of June, on this date not all residents had received their consultation letter. We also found it disappointing that consultation booklets were not included with the notification letter and hard copies would need to be requested. Our parish consists mostly of an elderly population with no computer access.

Our parish falls in Suffolk, yet there were no Suffolk public exhibition. The closest exhibition was held on a Thursday 23rd June between 2:30 -6:30pm in Chippenham. This is not acceptable for our residents who work and/or who either rely on public transport, (there are no bus routes from Worlington to Chippenham)

So at this time we are not in agreement to the proposed changes and reserving our position as to whether or not this is a material change until more detailed information is provided.

Lastly we would also like to make a request a booklet of the proposed changes to be sent to all our Worlington residents.

Yours Sincerely

Cllr. Paula MacKenzie

Acting on behalf of the Worlington Parish Council

1.2 Responses received to AIL and Order limits change consultation (27 July to 24 August 2022)

Isleham Parish Council

ISLEHAM PARISH COUNCIL



Mr Murray
Sunnica
c/o Freepost SEC NEWGATE UK LOCAL

11th August 2022

Re Proposed Changes to Development Consent Order (Abnormal Indivisible Load)

Dear Mr Murray

I am writing in response to your email dated 26th July regarding the above.

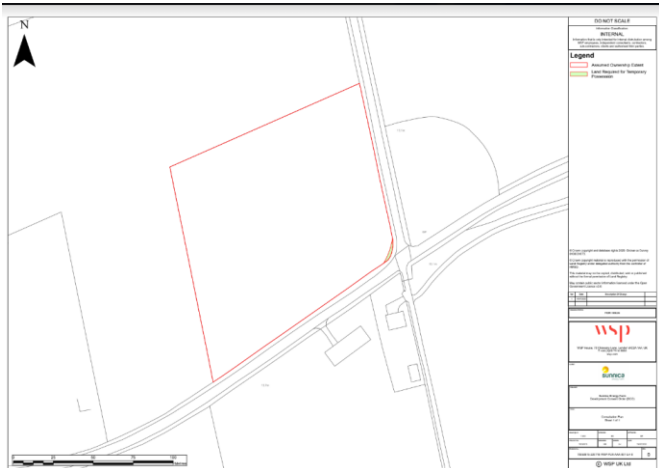
Although Councillors have no specific response to make to the proposed technical features of this application they have asked me to convey the following points to yourselves

- The consultation document was unnecessarily complicated to read with the Order Limits Change Map (copied below) showing absolutely no reference points by which the location could be identified
- Due to the holiday season and the challenge of obtaining meeting quorums Parish Councils generally don't meet during the month of August. It is therefore not appropriate for Sunnica to be expecting official responses during this identified period.
- This is just one of a number of requests from yourselves seeking Councillors views on aspects of your planning application. Councillors are annoyed at this apparent piecemeal approach towards consultation with little consideration of the time and consideration that is required to respond properly to your requests
- Sunnica have repeatedly failed to address the issues raised in previous responses, not least your continuing refusal to meet with the residents of Isleham. We are therefore extremely skeptical of this consultation being a genuine desire to hear our views

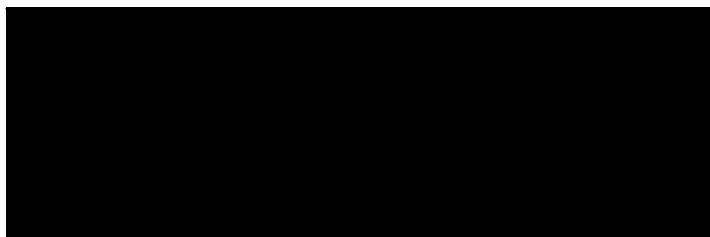
Yours sincerely



R.D. Liddington
Parish Clerk



Trustees of the Charity of Katharine Shore



FAO Sunnica Energy Farm
Freepost SEC NEWGATE UK LOCAL

Your ref: Sunnica-NMCs42-250722-234949, letter dated 25 July 2022

22nd August 2022

Dear Sir/Madam,

Re: Field on the corner of B1102 Mildenhall Road / Road to Beck Row,

The Trustees of the Charity of Katharine Shore have asked me to write to you responding to the consultation with the Charity in connection to the Proposed Changes to a Development Consent Order affecting the Charity's field on the corner of the B1102 Mildenhall Road and the Road to Beck Row (*Book of Reference EN010106 version 00 dated 18 November 2021, pp 264-5; Number on plan 20-02, 21-03, Category 1*).

The Trustees have considered your letter of the 25th July 2022, and the attached document *Abnormal Indivisible Loads required for Sunnica Energy Farm, version 00 dated 25/07/2022*. The Trustees had difficulty assessing the low resolution image "Plate 7" on page 8 of this document, as it wasn't possible to read the text. After raising this issue with Max Flowerdew at WSP, a higher resolution version of Plate 7 was provided, *Sunnica East Site A Indicative Vehicle Tracking For Transformer Delivery – Sheet 5 of 7 dated 28/06/2022*. All these documents were considered by the Trustees during a formal Trustee meeting.

The Trustees noted that your letter of the 25th July 2022 mentions negotiating a licence agreement between Sunnica and the Charity for the temporary use of the land in connection with the transformer delivery. However, to date no terms have been proposed. The Trustees have therefore resolved to reserve their position on the licence agreement for the moment.

The Charity is very small, employing no staff, volunteer trustees and a turnover of less than £2k per annum, and exists to alleviate poverty within the village of Freckenham. The Trustees do not consider themselves able to negotiate a licence agreement without professional assistance from a solicitor experienced in such matters. Therefore, please would Sunnica confirm if the Charity's reasonable costs in engaging an appropriate solicitor for the purposes of negotiating a licence would be met in full by Sunnica?

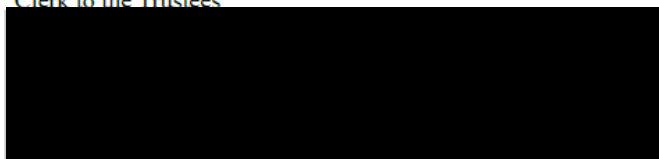
The Trustees look forward to your reply.

Yours faithfully,

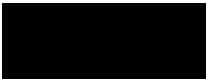
(by email)

Andrew Douch

Clerk to the Trustees



National Highways



Many thanks for your correspondence. Having reviewed the two pdf attachments that you provided (Abnormal Indivisible Loads required for Sunnica Energy Farm and Order Limits Change Plan) I can confirm that National Highways do not wish to comment on the changes. This is due to the proposals having no effect on the Strategic Road Network.

Many thanks for the opportunity to engage.

Kind regards

Emma

Emma Wood, Spatial Planner



Cambridgeshire County Council, East Cambridgeshire District Council, Suffolk County Council & West Suffolk Council

Content of consultation materials

Documents reviewed:

- Abnormal Indivisible Loads required for Sunnica Energy Farm Rev 00 dated 25/07/2022
- Consultation on Proposed Changes 25th July to 24th August 2022. [REDACTED]

The consultation does not include any information on the following:

- Changes in traffic volumes resulting construction and operation of the revised substations and cable corridors presented as option 3 together with any re-assessment of the relevant parts of the Environmental Statement. While the environmental impacts of the change may indeed be similar overall it is for the applicant to demonstrate that the changes do not create a greater impact at a specific location. For example, it is not clear if changes will be required to the permanent accesses for the relocated sub stations.
- Assessment of highway structures or construction to demonstrate they can carry appropriate heavy loads in the area adjacent to the site and the wider regional route to suitable ports. In 2.1.4 the applicant implies that discussions with the police and LHA will be at a later stage and hence at this time uncertainty remains that AILs can access the site.
- Future security of AIL routes.

The drawing supplied¹ showing the additional area required for oversailing AILs at the junction of the B1102 Mildenhall Road and C603 Feckenham Road lacks sufficient detail as a consultation document. The plan provides very little geographical information making it insufficient as a detailed plan. While a single road name and proximity to a village are indicated at the bottom of Paragraph 6 of the covering letter, this is not considered satisfactory and should be supplemented with (or inset into) an appropriate location plan. Whilst the Councils have access to plans that enable it to identify the location this is likely to be difficult for other stakeholders lacking this data. SCC notes that the highway boundary has not been determined at this location.

¹ Consultation Plan Drawing No: 70050915-220719-WSP-PLN-AAA-001-LH-0

The Councils are concerned Sunnica have not commissioned detailed surveys to confirm the highway boundaries of the relevant junctions and links and thereby confirming that AILs (or other works) do not extend beyond the public highway except where already identified.

An example is in Freckenham at the junction of the B1102 The Street/Mildenhall Road and the U6003 Elms Road where the western boundary of the highway is yet to be determined.

In Section 2.1.4 it is indicated that 'The swept analysis has been based upon OS mapping' and that this 'is considered sufficient for this stage of the planning process'. Given the concerns elsewhere within this response, with respect to ensuring vehicle wheel track remains within the metalled carriageway and that verified highway extent be accurately detailed, the Councils would question this, especially given low confidence in the existing base within the more rural locations based on local experience.

There are no tree surveys provided at junctions and bends where the swept path analysis demonstrates there might be damage to trees. There are tree preservation orders on trees at the junction of B1102 Mildenhall Road and The Street, Freckenham TPO/1972/182. The applicant should be aware that trees within the highway verge are not normally protected by tree preservation orders because they are not considered to be under any risk. Accurate information on trees, a survey to the standard in BS837:2012 Trees in relation to design, demolition and construction should be provided.

The Councils are concerned that not all of the hedgerows/trees identified for works have been assessed as part of the Preliminary Bat Roost Appraisal Report (figures 2.1-2.9, Appendix 8J - Report on Surveys for Bats, ES [APP-087]). It is therefore not possible to determine the level of impact of these works.

This latest change will further affect the verges and roadside vegetation of a number of road junctions.

The impact on landscape was not assessed in the ES and there is a lack of baseline information to inform any assessment. The Councils would expect the impact of these road schemes to be assessed in full taking into account site constraints.

Sunnica East

No assessment is provided on the A14/A142 Newmarket junction. If Ipswich is considered as the port of origin for AILs travelling to Sunnica East these will need to be reversed at this junction as there is no westbound access from the A14 to the northbound A11. The junction is due to be improved to accommodate additional traffic from the permitted Hatchfield Farm development, but it is

understood that the developer for this site has not considered AIL movements within the design as this is not a DfT preferred high or heavy load route.

Within Sunnica East one of the sub stations is shown located in E33. The LHA would ask the applicant to explain how heavy or wide loads will access this area during construction and operation noting that unless alternatives are provided these will need to pass over the historic rail bridge on the C603 Freckenham.

There has been no ecological survey work undertaken on the area of land shown on Construction Plan (sheet 1 of 1). It is therefore not possible to determine whether or not the proposed works to allow for the journey of the Abnormal Indivisible Load (AIL) to Sunnica East Site A during construction will affect priority habitats, protected or priority species, or habitats or species of local, district or county importance and to what magnitude / significance. And whether this will / will not significantly affect the ecological assessment set out in Chapter 8, or if additional mitigation measures are required as part of the Frameworks Construction Environmental Management Plan. Therefore the Councils seek that the proposed amendment to the application is accompanied with a detailed ecological assessment, along with any relevant updates to Chapter 8 & accompanying figures / appendices.

Bend on B1102 The Street/Mildenhall Road (Plate 6)

The blue line (wheel path) clearly shows this run over the circular island at the junction of the B1102 The Street, Mildenhall Road, Freckenham (Plate 6). The applicant states that they have only considered trimming of vegetation at this location (4.1.1). The area is included within the order limits but no information has been provided on any works here. The LHA would note that these could damage the roots for the tree within the island.

The Councils are concerned that not all of the hedgerows/trees identified for works for this junction have been assessed as part of the Preliminary Bat Roost Appraisal Report (figures 2.1-2.9, Appendix 8J - Report on Surveys for Bats, ES [APP-087]). It is therefore not possible to determine the level of impact of these works.

i. Unnamed Road and Beck Road Junction (Plate 8)

The Councils are concerned that not all of the hedgerows/trees identified for works have been assessed as part of the Preliminary Bat Roost Appraisal Report (figures 2.1-2.9, Appendix 8J - Report on Surveys for Bats, ES [APP-087]). It is therefore not possible to determine the level of impact of these works.

ii. B1103 Swan Lane/Oxford Street Junction, Exning (Plate 11)

See Plate 11. It is noted that the oversailing load is immediately adjacent to The White Swan Public House. The base map is derived from ordnance survey and the Councils would again draw the applicant's attention to potential errors in such map and in this specific case the presence of gutters, down pipes and roof overhang associated with the building. To SCC's knowledge the highway boundary at this location has not been determined as shown in Figure 1 below.



Figure 1: Plan of B1103 Swan Lane/Oxford Street showing that highway boundaries have not been determined.

iii. Sunnica West

In paragraph 3.1.1 it is noted that the diagram 521 warning sign (two-way traffic) and end of clearway sign will be temporarily removed or relocated. It is essential for the safety of vehicles leaving the dual carriageway that the Diagram 521 sign is evident to all traffic in normal use. The CTMP must identify how this will be removed and immediately reinstated as the abnormal load passes.

In addition Plate 2 is considered to be incorrect in that it does not accurately show the maturity of landscaping and it is presumed that National Highways have been consulted, as some of the land that will be required falls under its control.

Section 6 suggests only one location where over sail of the highway boundary will occur, requiring the DCO boundary to be amended, whereas there appear to be at least two additional locations on Weirs

Drove, Burwell where this occurs. 2.1.4 indicates that the swept path information is based upon OS rather than Topographical survey and is noted to not include the verified extent of the public highway (simple extracts from the highway record would not be sufficient in this regard, as it can on occasions erroneously include other features, such as riparian owned ditches). Without appropriate base information, it is not possible to confirm whether the wheel track will remain within the carriageway or that over sail may be contained within the public highway.

In the absence of accurate survey or verified highway extents it is unclear as to whether the AIL will over sail the existing road. In this context it is unclear what is meant by 'road' in paragraph 2.1.2 and whether this term includes all infrastructure within the public highway limits.

La Hogue Road is narrow in places, and it should be established whether opposing traffic can pass without overrunning of the carriageway risking damage to its edge and potential verge rutting.

iv. High Street/ Park Road B1085, (Chippenham)

While providing Plate 5 is appreciated, it is not clear why the return bend where the driveway to Chippenham Hall joins the B1085 has not been shown. While the developer might consider there not to be an impact, details for all relevant bends should be provided even to justify that there will be no impact.

v. Newmarket Rd (B1103)/Isaacson Road junction, Burwell. (Plate 10)

This section refers to oversailing verge, whereas a footway is present. As previously discussed, the highway extent must be verified, and appropriate measures implemented within the CTMP to manage and protect NMU use of this footway.

It is indicated that 'existing vegetation may need to be cut back to allow for trailer over sail; it is however unclear whether the hedge located within public highway or on private land. This must be verified before any work is undertaken and any appropriate notices served.

It is unclear whether or not the proposals will include cutting back of tree branches as part of the proposed site access works AS-39 (plate 10). If the tree will be cut, the Councils are concerned that the tree was not assessed as part of the Preliminary Bat Roost Appraisal Report (figures 2.1-2.9, Appendix 8J - Report on Surveys for Bats, ES [APP-087]) and therefore, it's not possible to determine the level of impact of these works.

vi. Reach Road(B1103)/Weirs Drove, Burwell. (Plate 13)

While Plate 12 includes dimensions, the central island shown does not appear to accurately represent the island seen on site; it is therefore unclear whether this site has been accurately surveyed, or

whether these are singular dimension. Previous comments regarding the base upon this swept path would remain applicable.

The proposed works for AS-35 includes the removal of two trees, which the applicant have identified as of low / moderate potential for bats, with not bat roosts identified in the 2021 survey. However, at least one, if not both of these trees were not assessed as part of the Preliminary Bat Roost Appraisal Report (figure 2.9, Appendix 8J - Report on Surveys for Bats, ES [APP-087]). It is therefore not possible to determine the level of impact of these works.

vii. 'S'- Bend on Weirs Drove, Burwell. (Plate 12)

While described as 'remaining within the highway during its transit of both bends', the transit of the eastern bend shown on plate 13 shows it to overhang the ditch. While no verified highway extent is shown on plan, it appears likely that this ditch is riparian owned.

It is indicated that two trees may require pruning. The trunk of one of these trees is shown fully within the swept path and is likely to be entirely compromised by this proposal.

viii. Weirs Drove/ Newnham Drove Junction, Burwell. (Plate 14)

While it is indicated that 'the trailer will over sail the inside grass verge by approximately 8m but the vehicle will remain within the highway', it appears on plate 14 to overhang the ditch on the north-western corner. While no verified highway extent is shown on plan, it appears likely that this ditch is riparian owned.

ix. Other Sunnica West sites

It is noted the consultation material only covers the route and does not show access into the Burwell National Grid sub-station site, or Sunnica West Site A (presuming these are the only site requiring such access). The individual access design, at Appendix 13C considers a swept path for a 1000T crane in points 5.9.10 and 5.9.11.

The wheel track may be accommodated in the same footprint as the 1000T crane, but this will need to be shown. The over sail of the hedge line to the south (and possibly to the north as it turns left within the site) of the proposed junction may be significant. Looking at the position of access B on Appendix 13C Fig 10, any over sail would appear to be within the DCO boundary, so likely to be achievable, although requiring further removal of trees upon which others may want to comment. Similarly from Figure 2 of Appendix 13C, Sunnica West Site A access A, the whole frontage onto La Hogue Road is included in the DCO boundary, so should again be achievable.

