

BY E-MAIL

Secretary of State for Energy Security and Net  
Zero  
Energy and Infrastructure Planning  
1 Victoria Street  
London  
SW1H 0ET

13 November 2025

Dear Secretary of State

**THE SUNNICA ENERGY FARM ORDER 2024  
PROPOSED NON-MATERIAL CHANGE APPLICATION – REQUEST FOR REDUCTION IN  
CONSULTEES UNDER REGULATION 7(3) OF THE INFRASTRUCTURE PLANNING  
(CHANGES TO, AND REVOCATION OF, DEVELOPMENT CONSENT ORDERS)  
REGULATIONS 2011**

**1. INTRODUCTION**

1.1 We act for Sunnica Limited (“**Sunnica**”).

1.2 On 12 July 2024, the Secretary of State made the Sunnica Energy Farm Order 2024 (S.I. 2024 No. 802) (the “**Order**”) as corrected by the Sunnica Energy Farm (Correction) Order 2024 (S.I. 2024 No. 1154) in respect of the installation of solar photovoltaic generating panels and electrical battery storage technology on Sunnica East and Sunnica West, and associated infrastructure for connection to the national grid (the “**Scheme**”). The Scheme is proposed to connect to the national grid at the Burwell National Grid Substation (the “**Existing Substation**”).

**2. NON-MATERIAL CHANGE TO THE ORDER**

2.1 The Order authorises the construction and operation of cabling to connect the Scheme to the Existing Substation.

2.2 Following the original application for the Order, the Existing Substation has been extended to include the area shown shaded yellow (the “**Additional Land**”) in the plan at Appendix 1 to this letter. The existing Order limits are shown edged red on that plan.

2.3 Following discussions with National Grid Electricity Transmission plc (“**NGET**”), the owner and operator of the Existing Substation (including the Additional Land), Sunnica is proposing to change the proposed location for the cabling to connect the Scheme to the Existing Substation to instead be located within the Additional Land. All land rights in relation to this cabling will continue to require agreement between Sunnica and NGET.

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- 2.4 The focus of the non-material change is therefore to amend the Order limits to include the Additional Land, via updates to the corresponding plans and documents, to facilitate this re-location of the cabling. The extension of the Order limits is shown via the blue line the plan at Appendix 1 to this letter.
- 2.5 The Additional Land is limited in scope and is currently being used for hardstanding (i.e. it has already been built on), plus Sunnica will not be seeking any further compulsory acquisition rights to those already granted within the Order; therefore, it is considered that the change is non-material and will not give rise to any new or materially different environmental effects to those originally assessed as part of the application for the Order. In addition, Sunnica has held discussions with NGET on the new routing for its cables and understands that NGET has no objection to the Order limits being extended to include the Additional Land.
- 2.6 As a result of the above, some minor consequential changes are required to the Order. These changes are needed to ensure that the Order limits are extended to include the Additional land, such that the re-location of the cabling to connect the Scheme to the Existing Substation is facilitated.
- 2.7 The changes to the Order that will comprise the non-material change are simply to amend the references to the corresponding plans and documents in Schedule 10 (Documents and plans to be certified) of the Order, with such plans and documents to be submitted for certification as part of this application.
- 2.8 Sunnica notes that it previously considered including a second non-material change to the Order in its proposed application, relating to an extension of the principle in Article 6(3) of the Order such that it covers any future planning permissions that overlap with the Order. However, this change has been deemed unnecessary for this project and is therefore no longer sought by Sunnica.
3. **CONSULTATION AND SUBMISSION OF THE NON-MATERIAL CHANGE APPLICATION**
- 3.1 Applications for non-material changes to development consent orders are governed by the Infrastructure Planning (Changes to, and Revocation of, Development Consent Orders) Regulations 2011 (“**the Regulations**”). Under regulation 7(3), the applicant can seek written consent to reduce the number of parties that need to be consulted on a non-material change application.
- 3.2 We consider that, taking a proportionate approach, only the following organisations should be consulted on this application:
- 3.2.1 Suffolk County Council, as a host authority for the Scheme;
  - 3.2.2 West Suffolk Council, as a host authority for the Scheme;
  - 3.2.3 Cambridgeshire County Council, as a host authority for the Scheme and because the Additional Land for the non-material change lies within its administrative area;
  - 3.2.4 East Cambridgeshire District Council, as a host authority for the Scheme and because the Additional Land for non-material change lies within its administrative area;
  - 3.2.5 Burwell Parish Council, as the Additional Land for non-material change lies within its parish;

3.2.6 NGET, as the owner and operator of the Additional Land for non-material change; and

3.2.7 Swaffham Internal Drainage Board, as the holder of drainage rights in relation to the Additional Land for non-material change,

together, the “**Consultees**”.

3.3 The Consultees’ operations are relevant to the proposed non-material change, whereas all other previous consultees during the application for the Order are unaffected by the proposals.

3.4 We would be grateful for the Secretary of State’s confirmation that this approach to consultation is acceptable. Sunnica intends to submit the non-material change application to the Order shortly.

3.5 If you would like to discuss this letter, please contact [REDACTED] at [REDACTED] [@pinsentmasons.com](mailto:[REDACTED]@pinsentmasons.com).

Yours sincerely

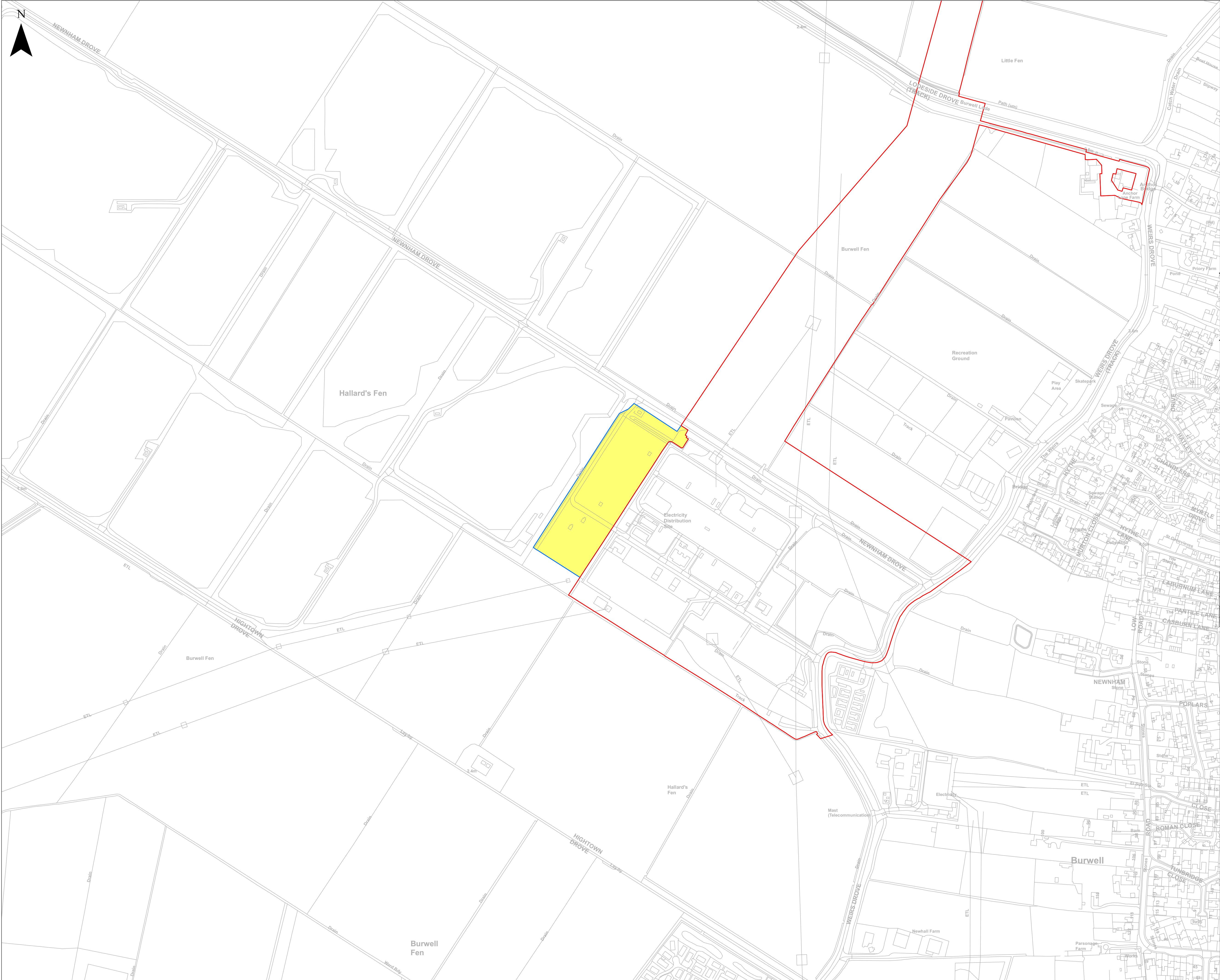
**Pinsent Masons LLP**

**(This letter has been sent electronically and so is unsigned)**

## **APPENDIX 1**

### **PLAN SHOWING PROPOSALS FOR THE NON-MATERIAL CHANGE**





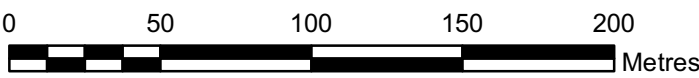
The Sunnica Energy Farm Order

Non Material Change Plan

Sheet 1 of 1

Key

- 2024 Consented Development Consent Order Boundary
- 2025 Non Material Change Additional Land



Notes

1. All dimensions are in metres unless stated otherwise

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Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 - Regulation 5(2)(i) and 5(2)(n)

Ver	Date	Description Of Change
01	OCT 2025	SUBMISSION FOR NMC APPLICATION

DRAWING STATUS: SUBMISSION FOR NMC APPLICATION



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CLIENT:



PROJECT:

Sunnica Energy Farm  
Development Consent Order (DCO)

TITLE:

Application Document Reference [EN010106/APP/2.1]  
Non Material Change Plan

SCALE @ A1:	1:2,500	CHECKED:	SA	APPROVED:	VB
PROJECT No:	70050915	DESIGNED:	NM	DRAWN:	BS
				DATE:	10/10/2025

DRAWING No:	70050915-251008-WSP-PLN-AAA-001-BS-1	REV:	01
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