

BY E-MAIL

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

For the Attention of: Energy Infrastructure Planning Team

27 November 2025

Dear Energy and Infrastructure Planning Team

REGULATION 4 OF THE INFRASTRUCTURE PLANNING (CHANGES TO, AND REVOCATION OF, DEVELOPMENT CONSENT ORDERS) REGULATIONS 2011

APPLICATION TO MAKE A NON-MATERIAL AMENDMENT TO THE SUNNICA ENERGY FARM ORDER 2024 (S.I. 2024/802) AS CORRECTED (S.I. 2024/1154)

- 1. INTRODUCTION AND BACKGROUND
- 1.1 Sunnica Limited ("Sunnica") (company number 08826077) of registered office 2 Crossways Business Centre Bicester Road, Kingswood, Aylesbury, England, HP18 0RA is the undertaker with the benefit of the Sunnica Energy Farm Order 2024, which was granted by the Secretary of State for Energy Security and Net Zero on 12 July 2024 (S.I. 2024 No. 802) as corrected by the Sunnica Energy Farm (Correction) Order 2024 (S.I. 2024 No. 1154) following an application made by Sunnica (the "Order").
- 1.2 The Order includes provision authorising the construction, operation, maintenance and decommissioning of a generating station with a gross electrical output capacity of over 50MW, comprising ground mounted solar photovoltaic panel arrays; one or more battery energy storage systems with a gross storage capacity of over 50MW; connection to the UK electricity transmission system and other associated and ancillary development (the "Scheme").
- 1.3 Sunnica seeks to make a non-material change (the "**NMC**") to the Order.
  - NMC extending the Order limits to include the extension to the Existing Substation
- 1.4 The Order authorises the construction and operation of cabling to connect the Scheme to the national grid at the Burwell National Grid Substation (the "**Existing Substation**").
- 1.5 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 3 to this letter. The existing Order limits are shown edged red on that plan. The Additional Land is limited in scope and is currently being used for hardstanding (i.e. it has already been built on).
- 1.6 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 Pinsent Masons LLP

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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.

- 1.7 The focus of the NMC is therefore to amend the Order limits to include the Additional Land (which is only approximately 2 hectares in size and comprises previously developed land), via updates to the corresponding plans and documents, to facilitate this re-location of the cabling. This requires a small extension to Work No. 4 to cover the Additional Land, which does not give rise to any new or materially different environmental effects to those originally assessed as part of the application for the Order (given the area is currently being used for hardstanding and as set out in the Environmental Report in support of this statement, the conclusions of which are summarised at paragraph 3.3 of the NMC application at Appendix 1 of this letter and which is appended in full at Appendix 2). Further, no powers (including in relation to compulsory acquisition) are being sought by Sunnica over the Additional Land. The extension of the Order limits is shown via the blue line the plan at Appendix 3 to this letter.
- 1.8 The change to the Order that comprises the NMC is 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.
- 1.9 The NMC proposed to the Order by Sunnica is necessary for the reasons set out above. The NMC will not give rise to any materially new or materially different environmental effects to those originally assessed as part of the application for the Order, nor would it require additional compulsory acquisition of land, nor would it have new or different effects on local residents or business or any additional implications in respect of habitats regulation assessment; therefore, Sunnica considers that the NMC is non-material in nature. Sunnica has produced the Environmental Report in support of this statement, the conclusions of which are summarised at paragraph 3.3 of the NMC application at Appendix 1 of this letter and which is appended in full at Appendix 2.
- 1.10 Sunnica has held discussions with NGET in relation to the NMC and understands that NGET is supportive of the proposals, as evidenced by the letter appended as Appendix A to the Environmental Report.

#### 2. **SUPPORTING DOCUMENTATION**

- 2.1 Sunnica is applying to the Secretary of State pursuant to section 153 and paragraph 2 of Schedule 6 to the Planning Act 2008 to make a change to the Order that is not material. This application is subject to the Infrastructure Planning (Changes to, and Revocation of, Development Consent Orders) Regulations 2011. As such, the following documents are included to support the application for the NMC:
  - 2.1.1 NMC application (included as the first Appendix to this letter);
  - 2.1.2 Environmental Report (included as the second Appendix to this letter);
  - 2.1.3 Plan to show NMC proposals (included as the third Appendix to this letter);
  - 2.1.4 Regulation 6 Notice;
  - 2.1.5 Regulation 7 Letter;
  - 2.1.6 draft amendment Order (Word and PDF version);
  - 2.1.7 email confirming successful validation of the draft amendment Order;
  - 2.1.8 Access and Rights of Way Plans:
  - 2.1.9 Book of Reference (clean and tracked);

- 2.1.10 sheet 20 of the land and Crown land plans;
- 2.1.11 Schedule of Negotiations and Powers Sought (clean and tracked);
- 2.1.12 Traffic Regulation Measures Plans Road Closures; and
- 2.1.13 Works Plans.
- 2.2 Please do contact at a serior at a <u>@pinsentmasons.com</u> should you have any further questions.

Yours sincerely

Pinsent Masons LLP (This letter has been sent electronically and so is unsigned)



#### **APPENDIX 1**

#### NON-MATERIAL CHANGE APPLICATION REPORT

#### 1. INTRODUCTION

- 1.1 Sunnica Limited ("Sunnica") (company number 08826077) of registered office 2 Crossways Business Centre Bicester Road, Kingswood, Aylesbury, England, HP18 0RA is the undertaker with the benefit of the Sunnica Energy Farm Order 2024, which was granted by the Secretary of State for Energy Security and Net Zero on 12 July 2024 (S.I. 2024 No. 802) as corrected by the Sunnica Energy Farm (Correction) Order 2024 (S.I. 2024 No. 1154) following an application made by Sunnica (the "Order").
- 1.2 The Order includes provision authorising the construction, operation, maintenance and decommissioning of a generating station with a gross electrical output capacity of over 50MW, comprising ground mounted solar photovoltaic panel arrays; one or more battery energy storage systems with a gross storage capacity of over 50MW; connection to the UK electricity transmission system and other associated and ancillary development (the "Scheme").
- 1.3 Sunnica seeks to make a non-material change (the "**NMC**") to the Order.
  - NMC extending the Order limits to include the extension to the Existing Substation
- 1.4 The Order authorises the construction and operation of cabling to connect the Scheme to the national grid at the Burwell National Grid Substation (the "Existing Substation").
- 1.5 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 3. The existing Order limits are shown edged red on that plan. The Additional Land is limited in scope and is currently being used for hardstanding (i.e. it has already been built upon).
- 1.6 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.
- 1.7 The focus of the NMC is therefore to amend the Order limits to include the Additional Land (which is only approximately 2 hectares in size and comprises previously developed land), via updates to the corresponding plans and documents, to facilitate this re-location of the cabling. This requires a small extension to Work No. 4 to cover the Additional Land, which does not give rise to any new or materially different environmental effects to those originally assessed as part of the application for the Order (given the area is currently being used for hardstanding and as set out in the Environmental Report in support of this statement, the conclusions of which are summarised at paragraph 3.3 below and which is appended in full at Appendix 2). Further, no powers (including in relation to compulsory acquisition) are being sought by Sunnica over the Additional Land. The extension of the Order limits is shown via the blue line the plan at Appendix 3.
- 1.8 The change to the Order that comprises the NMC is 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.
- 1.9 The NMC proposed to the Order by Sunnica is necessary for the reasons set out above and Sunnica is seeking the NMC as such. The NMC will not give rise to any materially new or materially different environmental effects to those originally assessed as part of the application for the Order, nor would it require additional compulsory acquisition of land, nor would it have

new or different effects on local residents or business or any additional implications in respect of habitats regulation assessment; therefore, Sunnica considers that the NMC is non-material in nature. The change required comprises changes to Schedule 10 of the Order, as set out at section 3 below.

- 1.10 Sunnica has held discussions with NGET in relation to the NMC and understands that NGET is supportive of the proposals, as evidenced by the letter appended as Appendix A to the Environmental Report.
- 1.11 Sunnica hereby applies to the Secretary of State pursuant to section 153 and paragraph 2 of Schedule 6 of the 2008 Act to make a change to the Order that is not material (referred to hereafter as the "NMC Application"). The NMC Application is subject to the Infrastructure Planning (Changes to, and Revocation of, Development Consent Orders) Regulations 2011 (the "2011 Regulations"). The NMC Application has been prepared with reference to the Department of Communities and Local Government document 'Guidance on Changes to Development Consent Orders' (December 2015).
- 1.12 This document sets out the proposed NMC to the Order sought by Sunnica and the rationale for doing so and details of the consultation process undertaken. It also sets out why the change sought in the NMC Application will not result in any materially new or materially different environmental effects to those originally assessed as part of the application for the Order, given that the change proposed is technical and would not result in any development beyond that already consented through the Order, which has already been subject to Environmental Impact Assessment.

#### 2. CONSULTATION PROCESS

#### **Background**

- 2.1 Under the 2011 Regulations, on making an NMC Application the applicant must notify and consult those persons specified in the 2011 Regulations, this being all those who were notified (in accordance with section 56 of the Planning Act 2008) when the application for the original development consent order was accepted by the Secretary of State, as well as any other person who may be directly affected by the change proposed in the application.
- 2.2 Regulation 7(3) of the 2011 Regulations also provides that an applicant need not consult a person or authority specified in the Regulations if they have the written consent of the Secretary of State not to do so.
- 2.3 A letter of 13 November 2025 from Pinsent Masons to the Secretary of State requested written consent from the Secretary of State under regulation 7(3) of the 2011 Regulations that only Suffolk County Council, West Suffolk Council, Cambridgeshire County Council, East Cambridgeshire District Council, Burwell Parish Council, NGET and Swaffham Internal Drainage Board (together, the "Consultees") should be consulted on the NMC Application, for the reasons set out in that letter for each organisation.
- 2.4 On 19 November 2025, the Secretary of State confirmed that the consultee list need only include the Consultees.
- 2.5 The Secretary of State agreed that all other parties need not be consulted as they are not directly affected by the NMC Application, either because the NMC proposed will not affect their interests or because their interests relate to a different part of the Scheme.
- 2.6 Accordingly, the Secretary of State gave written consent, under regulation 7(3) of the 2011 Regulations, that only Consultees need be consulted on the NMC Application. No other parties who may be directly affected by the change proposed in the NMC Application have been identified.

#### Overview

- 2.7 Regulations 6 and 7 of the 2011 Regulations set out the process for publicising and consulting respectively on an NMC Application. Pursuant to Regulation 7A of the 2011 Regulations, Sunnica will submit a separate Consultation and Publicity Statement confirming its compliance with Regulations 6 and 7A of the 2011 Regulations.
- 2.8 In summary, the following has, or is being, undertaken by Sunnica to comply with Regulations 6 and 7:
  - 2.8.1 Sunnica is publicising the NMC Application by publishing a notice in each of The Newmarket Journal and Ely Standard for two successive weeks. The notice will be published for the first time on 27 November 2025 when the NMC Application is made to the Secretary of State. A copy of the notices will be included in the Consultation and Publicity Statement;
  - 2.8.2 the Planning Inspectorate's ("PINS") project email address (Sunnica@planninginspectorate.gov.uk) has been included in the notice publicising the NMC Application so that members of the public can make a formal response to PINS in relation to the NMC Application; and
  - 2.8.3 following receipt of notice from the Secretary of State pursuant to Regulation 7(3) on 19 November 2025, the list of consultees contacted regarding the NMC Application will be the Consultees defined above.
- 2.9 The NMC Application will be available to view on the project website at:

https://sunnica.co.uk/

and also on PINS' website at:

https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN010106/documents

- 2.10 Hard copies of the NMC Application can be requested by contacting Sunnica at info@sunnica.co.uk or on 0808 168 7925. Each hard copy is available at the cost of £25 per copy.
- 2.11 Consultees are invited to provide comments on the NMC Application until the closing date for consultation which is no less than 28 days following the date when the notice is last published.
- 3. PROPOSED NON-MATERIAL CHANGE TO THE ORDER
- 3.1 The Order consists of 45 articles and 15 schedules. The NMC Application proposes changes only to Schedule 10. The content of these changes is set out in the table below.

Table 1 - Proposed changes to the Order

Article of the Order	Proposed Change			
Schedule 10	Amend the following rows of the table:			
	(1) Document name	(2) Document reference	(3) Revision number	(4) Date
	access and rights of way plans	2.3	67	24/03/2023 27/11/2025
	book of reference	4.3	<del>9</del> 10	30/08/2023 27/11/2025
	land and Crown land plans – sheets 1-19 and 21-22	2.1	6	30/01/2023
	land and Crown land plans – sheet 20	2.1	7	27/11/2025
	traffic regulation measures plans – temporary road closures	2.4	34	<del>30/01/2023</del> 27/11/2025
	works plans	2.2	<del>5</del> 6	03/03/2023 27/11/2025

- 3.2 The change to the Order proposed is required for the reasons set out in paragraphs 1.4 to 1.10 above.
- 3.3 Sunnica has produced the Environmental Report, which is appended in full at Appendix 2, in order to confirm that the proposed change will not result in any materially new or materially different environmental effects to those originally assessed as part of the application for the Order. In summary, the conclusions of this report are as follows:
  - 3.3.1 the NMC is non-material and does not result in any new, or changed, environmental effects (including those upon local people) established by the Environmental Statement;
  - 3.3.2 all previously identified effects and mitigation measures remain valid and applicable;
  - 3.3.3 the NMC does not result in the need for a Habitats Regulations Assessment or any new, or additional, licences in respect of European Protected Species; and
  - 3.3.4 whilst additional land not already included in the Order limits is proposed to facilitate the NMC, additional compulsory acquisition of land is not required.

#### 4. SUMMARY AND CONCLUSIONS

- 4.1 Sunnica is proposing to change the Order for the reasons set out in paragraphs 1.4 to 1.10 above.
- 4.2 No change to the other provisions in the Order, physical development or other controls regulating the construction, operation, maintenance or decommissioning of the authorised development are proposed.
- 4.3 The proposed change would not give rise to any materially new or materially different environmental effects to those originally assessed as part of the application for the Order, nor would it require additional compulsory acquisition of land, nor would it have new or different effects on local residents or business or any additional implications in respect of habitats regulation assessment.
- 4.4 Given the information presented in this document, as summarised above, it is considered that the proposed change is a non-material change for the purposes of the 2011 Regulations. Accordingly, Sunnica submits that the proposed change as outlined in section 3 of this document can be granted consent by the Secretary of State as a non-material change.



#### **APPENDIX 2**

## **ENVIRONMENTAL REPORT**



## SUNNICA ENERGY FARM

Environmental Report – in support of an application for a non-material change to the Sunnica Energy Farm Order 2024





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## 1 Introduction

- 1.1.1 Sunnica Limited (the "Applicant") is the undertaker with the benefit of the Sunnica Energy Farm Order 2024, which was granted by the Secretary of State on 12 July 2024 (S.I. 2024 No. 802) as corrected by the Sunnica Energy Farm (Correction) Order 2024 (S.I. 2024 No. 1154) following an application made by the Applicant (the "Order").
- 1.1.2 The Order includes provision authorising the construction, operation (including maintenance), and decommissioning of a generating station with a gross electrical output capacity of over 50MW, comprising ground mounted solar photovoltaic (PV) panel arrays, one or more Battery Energy Storage System (BESS) with a gross capacity of over 50MW, connection to the UK electricity transmission system and other associated and ancillary development (together referred to as the "Scheme"). The Order authorises the construction and operation of cabling to connect the Scheme to the national grid at the Burwell National Grid Substation (the "Existing Substation").
- 1.1.3 The Applicant proposes to make a non-material change ("NMC") to the Order, as set out in the Application Document to which this Environmental Report (hereafter referred to as the "Report") is an Appendix.
- 1.1.4 The NMC proposed to the Order by the Applicant is necessary for the reasons set out in the Application Document. The NMC will not give rise to any materially new or materially different environmental effects to those originally assessed as part of the application for the Order, nor would it require additional compulsory acquisition of land, nor would it have new or different effects on local residents or business or any additional implications in respect of habitats regulation assessment. This Report is produced in support of these conclusions.
- 1.1.5 This Report is supported by the following documents:
  - a. Appendix A Letter from National Grid Electricity Transmission Plc ("NGET"); and
  - b. Appendix B Ecological Appraisal Memo.



## 2 Environmental Appraisal of the NMC

#### 2.1 Introduction

- 2.1.1 This section of the Report identifies where the NMC (as set out in the Application Document) has the potential to result in new, or changed, effects as reported in the Environmental Statement ("ES") which supported the Order. This Report is intended to be read in conjunction with the ES. Where necessary, cross-references are made to these documents.
- 2.1.2 The "Additional Land" required for the NMC (shown shaded yellow in the plan at Appendix 3 of the Application Document) is limited in scope and is currently being used for hardstanding; it has already been built on as a substation extension by NGET.
- 2.1.3 The area of the proposed revised cable routing under the NMC is of the same general characteristics as the consented Scheme whereby, as previously, the cable would be able to cross Newnham Drove (albeit further west, near the Additional Land).
- 2.1.4 The Applicant has held discussions with NGET in relation to the NMC and understands that NGET is supportive of the proposals, as evidenced by the letter appended as Appendix A: Letter from NGET.
- 2.1.5 There will be no change to the trench width, voltage or characteristics of the cable as a result of the NMC, which will remain as set out in **Chapter 3: Scheme Description** of the ES [REP2-022] and the **Design Principles** [REP6-037].

## 2.2 Programme

- 2.2.1 The Scheme initially anticipated construction to commence, at the earliest, in Summer 2023, and to be ready for operation no earlier than Summer 2025 (with a construction programme of approximately 24 months, as per **Chapter 3: Scheme Description** of the ES [REP2-022]. The operational period of the Scheme is 40 years, with decommissioning no later than 40 years after the commencement of operation.
- 2.2.2 NGET has proposed an amended connection date for the Scheme to connect to the national grid at the Existing Substation on 31 October 2030. As such, construction is now anticipated to commence in 2027/2028, to allow for an approximate 24-36 month construction programme, with operation to commence from October 2030.
- 2.2.3 The Order allows for construction to commence within 5 years of the Order being made; therefore, this is anytime up to July 2029. Regulation 6 of the Infrastructure Planning (Interested Parties and Miscellaneous Prescribed Provisions) Regulations 2015 provides for a five-year implementation period from the date of consent (Ref-1). This statutory provision offers flexibility for developers to commence construction within that timeframe without the need to submit new environmental documentation or reassessments. It ensures that the Scheme remains within the parameters assessed in the ES and permitted by the Order. As such, the Order remains valid for a 2027/2028 construction start date. Whilst this presents a slightly different timeframe for assessment, it is not anticipated that this



will present any new, or changed, effects as reported in the ES, whereby the effects established within the ES will be the same but realised by the relevant receptors later. The construction dates are therefore not assessed further in this Report.

# 2.3 Scope and Methodology for the Assessment of the Proposed Change

2.3.1 An initial screening assessment has been completed to determine whether the NMC has the potential to result in new, or changed, effects for each of the relevant technical topics assessed in the ES. The results of the screening assessment are presented in **Table 2-1**. This screening assessment identifies any areas where further consideration of the likely environmental effects arising from the change to the Scheme are required. Further discussion of these 'Scoped-In' topics is provided in **Section 2.4**.



**Table 2-1 Environmental Screening Assessments for Proposed Development Change** 

ES Chapter / Standalone Document	Screening Decision (IN / OUT)	Rationale
Chapter 6: Climate Change of the ES [APP-038]	OUT	Given that the land proposed under the NMC is immediately adjacent to the Existing Substation, the minor shift in the cable corridor alignment would result in no material change to journey distances or construction logistics compared to the original cable alignment, as assessed in the ES. The area is already developed by NGET and therefore has negligible carbon sink potential. Furthermore, the change would not introduce any new sources of greenhouse gas emissions (e.g. from products, water use, fuel consumption, transport, or waste treatment). As such, the proposed change would not give rise to any new or materially different effects from those assessed in the ES, nor would it alter the mitigation measures identified. Climate Change is therefore scoped out of further consideration within this Report.
Chapter 7: Cultural Heritage of the ES [APP-039]	OUT	Figure 7-1i of the ES [APP-179] and Figure 7-2c of the ES [APP-182] show that there are no cultural heritage receptors to the west of the Existing Substation that would be impacted by the re-routing of the cable within the Additional Land. Given no impacts were reported within the vicinity of the Existing Substation within the ES, and the nature of the minor deviation in proposed cable routing, no additional, or changed, effects from those established in the ES are envisaged. Furthermore, the clearance within the Additional Land (currently being used for hardstanding) to allow for the future connection of the Scheme into the Existing Substation has already been undertaken – i.e. works undertaken by NGET which facilitate the proposed change that could have a potential effect upon archaeological and heritage resource. As such, the proposed change would not give rise to any new or materially different effects from those assessed in the ES, nor would it alter the mitigation measures identified. Cultural Heritage is therefore scoped out of further consideration within this Report.
Chapter 8: Ecology and Nature Conservation of the ES [APP-040]	IN	An updated ecological walkover of the accessible area of the Additional Land and its surroundings has been undertaken in order to provide an up-to-date appraisal of the baseline habitats relating to the Additional Land and the NMC, as reported in <b>Appendix B: Ecological Appraisal Memo</b> . Of note, there were signs of water vole presence (latrines and burrows) within the ditch to be crossed by the revised cable route, within the Additional Land.  Given the findings of <b>Appendix B: Ecological Appraisal Memo</b> , this topic has been <b>Scoped In</b> for further assessment.
Chapter 9: Flood Risk, Drainage and Water Resources of the ES [APP-041]	IN	The NMC will result in a minor change in the potential drain crossing location to that presented in the ES. The revised cable routing will mean that crossing W25, as presented in Figure 3-23u of the ES [APP-166] and Table 9-13 within Chapter 9: Flood Risk, Drainage and Water Resources of the ES [APP-



ES Chapter / Standalone Document	Screening Decision (IN / OUT)	Rationale
		<b>041]</b> , across the drain to the north of the Existing Substation and Newnham Drove may change. The crossing will still be on the same drain, approximately 350m north-west of the original location. The NMC will also result in a potential additional drain crossing within the Additional Land, immediately north of the extension to the Existing Substation, across the drain illustrated in Figure 1 <b>of Appendix B: Ecological Appraisal Memo</b> .
		As a result of this change in crossing location and potential additional drain crossing, Flood Risk, Drainage and Water Resources has been <b>Scoped In</b> for further consideration to establish if this change could result in any new, or changed, effects as established in the ES.
Chapter 10: Landscape and Visual Amenity (LVIA) of the ES [APP-042]	OUT	The NMC does not alter the LVIA assessment presented in the ES. The Additional Land is already developed and forms part of the Existing Substation operational footprint, with the proposed change relocating the connection point within this existing infrastructure. The proposed change does not introduce new above-ground infrastructure beyond what was assessed, nor does it alter the visibility or character of the Existing Substation in the surrounding landscape. As such, the proposed change does not result in any new or materially different LVIA effects compared to those identified in Table 10-28 of Chapter 10: Landscape and Visual Amenity of the ES the ES [APP-042], nor does it alter the mitigation measures identified. Consequently, LVIA is scoped out of further consideration within this Report.
Chapter 11: Noise and Vibration of the ES [APP-043]	OUT	The NMC does not alter the Noise and Vibration assessment presented in the ES. There are no Noise and Vibration receptors to the west of the Existing Substation, and the proposed change does not introduce any new noise sources or receptors beyond what was assessed in the ES. Given that all impacts to receptor R1/LT1 (see Figure 11-1 of the ES [APP-233] to the east of the Existing Substation (the closest receptor to the proposed change) are already negligible, this conclusion would be unchanged when considering the minor change in cable route. As such, the proposed change does not result in any new or materially different Noise and Vibration effects compared to those identified in the ES, nor does it alter the mitigation measures identified. As a result, Noise and Vibration has been scoped out of further consideration within this Report.
Chapter 12: Socio- Economics and Land Use of the ES [APP-044]	OUT	The NMC does not alter the Socio-Economic and Land Use assessment presented in the ES. The proposed change does not result in any new land take, nor does it affect any local amenities, land use, recreational assets, or farming resources identified in the ES. There is no change to construction workforce requirements, operational employment, local economy or supply chain impacts. As such, the proposed change does not give rise to any new or materially different effects compared to those identified in the ES, nor does it alter the mitigation measures identified. Socio-economics and Land Use is therefore scoped out of further consideration within this Report.



ES Chapter / Standalone Document	Screening Decision (IN / OUT)	Rationale
Chapter 13: Transport and Access of the ES [APP-045]	IN	The NMC will result in a minor change in road crossing location at Newnham Drove to that presented in the ES, where the potential crossing includes a section of Newnham Drove that was not included within the existing Order Limits. As a result of this change in crossing location, Transport and Access has been <b>Scoped In</b> for further assessment.
Chapter 14: Air Quality of the ES [APP-046]	OUT	There are no Air Quality receptors within the vicinity of the Existing Substation. The proposed change will not result in any increase in construction duration, vehicle movements, or dust-generating activities beyond those assessed in the ES. Furthermore, the proposed change would not introduce any new sources of emissions or receptors. As such, the proposed change would not give rise to any new or materially different effects from those assessed in the ES, nor would it alter the mitigation measures identified. As such, Air Quality has been scoped out of further consideration within this Report.
Chapter 15: Human Health of the ES [APP-047]	OUT	The NMC does not alter the Human Health assessment presented in the ES. There are no new receptors introduced and no change to the exposure pathways assessed in the ES. As such, the proposed change would not give rise to any new or materially different effects from those assessed in the ES, nor would it alter the mitigation measures identified. As such, Human Health has been scoped out of further consideration within this Report.
Chapter 16: Other Environmental Topics of the ES [REP2-026]	OUT	Glint and Glare – the NMC would not introduce any new areas of solar PV, which are the primary cause of glint and glare and as such would not result in any new or materially different effects from those assessed in the ES, nor would it alter the mitigation measures identified. As such, Glint and Glare has been scoped out of further consideration within this Report.
		Ground Conditions – The Additional Land has already been built on and is currently hardstanding and used as an extension to the Existing Substation. None of the land surrounding the Existing Substation was recorded as potentially contaminative, nor will the proposed change encroach into any new Mineral Safeguarding Areas not assessed within Appendix 16B: Ground Conditions – Phase 1 – Preliminary Environmental Risk Assessment of the ES [APP-122]. Therefore, the proposed change would not give rise to any new or materially different effects from those assessed in the ES, nor would it alter the mitigation measures identified. As such, Ground Conditions has been scoped out of further consideration within this Report.
		Major Accidents and Disasters (MADs) – the NMC does not introduce any new hazards, sensitive receptors, or infrastructure that would increase the risk of MADs. The nature and scale of the Scheme remains unchanged, and the mitigation measures identified in the ES remain valid. As such, the proposed change does not give rise to any new or materially different risks or effects compared to those assessed in the ES, nor would it alter



ES Chapter / Standalone Document	Screening Decision (IN / OUT)	Rationale
		the mitigation measures identified. MADs is therefore scoped out of further consideration within this Report.
		<b>Waste</b> – the NMC does not introduce any new construction activities, materials requirements, or waste generation beyond those assessed in the ES. There is no change to the types or quantities of materials required, nor to the waste management practices or mitigation measures identified. As such, the proposed change does not give rise to any new or materially different effects related to materials and waste compared to those assessed in the ES. Materials and waste are therefore scoped out of further consideration within this Report.
Chapter 17: Effect Interactions of the ES [APP-049]	OUT	Whilst the construction timeframe has shifted slightly later than originally assessed in the ES, the NMC is considered to be a non-material amendment and represents a minor adjustment to the Scheme. In line with Planning Inspectorate guidance, cumulative effects assessments should be proportionate to the nature and scale of the proposed change (Ref-2). Given that the amendment does not introduce new receptors, infrastructure, or environmental effects, it is not considered necessary or proportionate to undertake a revised cumulative search.
		It is acknowledged that new projects may have come forward since the original submission; however, these developments should have taken the Scheme into account within their own cumulative assessments, as required under the 2017 EIA Regulations or the 2008 Planning Act (Ref-3; Ref-4). The NMC is not considered substantial enough to change any cumulative effects that other schemes may have identified.
		This approach is consistent with the Planning Inspectorate's Advice Note Seventeen: Cumulative Effects Assessment, which emphasises that cumulative assessments should be targeted and proportionate, particularly in the context of a non-material change (Ref-2).

## 2.4 Further Assessment of Scoped-In Topics

#### **Ecology and Nature Conservation**

#### Introduction

2.4.1 As stated in **Table 2-1**, an updated ecological walkover of the accessible area of the Additional Land and its surroundings has been undertaken in order to provide an up-to-date appraisal of the baseline habitats relating to the Additional Land and the NMC, as reported in **Appendix B: Ecological Appraisal Memo**. The proposed change does not introduce any new receptors, alter existing environmental conditions, or change the nature or scale of the impacts assessed.



#### Assessment Summary

- 2.4.2 As reported in Appendix B: Ecological Appraisal Memo, the Survey Area was dominated by hardstanding and gravel, classed in UKHab<sup>1</sup> terms as artificial unvegetated, unsealed surface, in the form of the Existing Substation site. The area to the north of this supported a ditch and coarse gravel and bare earth, also classed as artificial unvegetated, unsealed surface, with areas colonised by sparsely vegetated urban land and species such as Bristly Oxtongue (Helminthotheca echioides), Wild Teasel (Dipsacus fullonum), and Creeping Thistle (Cirsium arvense). The small area in the east of the Site comprised unmanaged ruderal/ephemeral vegetation dominated by Creeping Thistle with abundant Mugwort (Artemisia vulgari), and frequent common nettle (Urtica dioica) and Greater Burdock (Arctium lappa). The land surrounding the Survey Area largely comprised the Existing Substation and woodland to the east, a solar farm and Common Reed (Phragmites australis) dominated ditch to the west, and arable fields with associated ditches to the north and south. There were no notable or irreplaceable habitats or floral species present within the Survey Area. A habitat map showing the Survey Area and its immediate surroundings is presented in Figure 1 of Appendix B: Ecological Appraisal Memo.
- 2.4.3 Given the limited habitats present on-site, only Badger and Water Vole were considered to have the potential to be present. No evidence (including setts, foraging signs or latrines) of Badger were found within the Survey Area.
- 2.4.4 The ditch between the Existing Substation and the coarse gravel and bare earth to the north (within the Additional Land) was wet at the time of the survey and supported latrines and freshly dug burrows belonging to Water Vole (location shown on Figure 1 of Appendix B: Ecological Appraisal Memo). It should be noted that Water Vole presence was also established within the existing Order Limits to the north of the Existing Substation, as reported in Chapter 8: Ecology and Nature Conservation of the ES [APP-040] and Appendix 8L: Report on Surveys for Riparian Mammals of the ES [APP-091], with mitigation secured as part of the Order to avoid impact to this protected species.

#### Additional Mitigation Requirements

2.4.5 The Framework Construction Environmental Management Plan ("CEMP") [REP10-014] (ref. Page 16C-13) notes: "A pre-construction site walkover will be undertaken in advance of mobilisation/any potential advance works to reconfirm the ecological baseline conditions and to identify any new ecological risks. Updated species surveys, including bats, great crested newt, breeding birds, otter, water vole and badger, will be completed as appropriate to re-confirm the status of protected species identified, to inform mitigation requirements and support protected species licence applications, if required by Natural England." This measure is also set out in the Outline Landscape Ecological Management Plan ("OLEMP") [REP10-012] (ref. paragraph 4.2.1). The Framework CEMP [REP10-014] (ref. Page 16C-21) and OLEMP [REP10-012] (ref. paragraph 4.1.8(b)) also note that: "The crossing of watercourses where the presence of Otter and Water Vole have been determined, as well as the River Kennett, River Snail, Lee Brook, New River and Burwell Lode, will be undertaken using boring, micro-tunnelling or

<sup>&</sup>lt;sup>1</sup> UKHab Ltd. (2023). The UK Habitat Classification Version 2.0. [online] Available at: https://www.ukhab.org [Accessed November 2024].



- moling methods, with appropriate setbacks from the top of the banks (depending on habitats and other individual ecological constraints)." The recommended setback with regards to Water Vole is >10m from the top of the bank, as noted in **Chapter 8: Ecology and Nature Conservation** of the ES **[APP-040]**.
- 2.4.6 The walkover did not identify any features within the Survey Area that would require additional mitigation measures to those already stated and secured within the Framework CEMP [REP10-014] and OLEMP [REP10-012]; therefore, the existing mitigation secured by the Order is deemed appropriate for the NMC, and no additional, or change to, the effects established in Chapter 8: Ecology and Nature Conservation of the ES [APP-040] are anticipated.

#### Conclusion

2.4.7 The proposed change does not result in any new, or changed, effects established by the ES. All previously identified effects and mitigation measures remain valid and applicable.

#### Flood Risk, Drainage and Water Resources

#### Introduction

2.4.8 As stated in **Table 2-1**, the NMC will introduce a minor change to drain crossing W25, as presented in **Figure 3-23u** of the ES **[APP-166]** and Table 9-13 within **Chapter 9: Flood Risk, Drainage and Water Resources** of the ES **[APP-041]**, and a potential additional drain crossing within the Additional Land across the drain illustrated in Figure 1 of **Appendix B: Ecological Appraisal Memo**. The proposed change does not alter existing environmental conditions or change the nature or scale of the impacts assessed.

#### Assessment Summary

- 2.4.9 Although the location of crossing W25, as presented in **Figure 3-23u** of the ES **[APP-166]** and assessed in **Chapter 9: Flood Risk, Drainage and Water Resources** of the ES **[APP-041]**, will move approximately 350m northwest of its assessed position, this adjustment is not considered to result in any material change to the assessment presented in the ES the crossing remains over the same ditch identified in the ES, meaning the sensitivity of the receptor itself is unchanged, and the proposed change does not change how this ditch may be crossed, or the extent of the crossing. The magnitude of impact remains the same as assessed in the ES.
- 2.4.10 The potential crossing of an additional ditch within the Additional Land, immediately north of the extension to the Existing Substation, is not considered to result in any material change to the assessment presented in the ES. Chapter 9: Flood Risk, Drainage and Water Resources of the ES [APP-041] considers the potential impact of the construction of Grid Connection Route B upon a number of receptors, including main rivers, tributaries and drains. The addition of another field drain crossing would not change the assessment of impacts presented in the ES, particularly when considering the mitigation measures secured by the Framework CEMP [REP10-014] as set out in Chapter 9: Flood Risk, Drainage and Water Resources of the ES [APP-041].



- 2.4.11 The revised crossing location of W25 will continue to utilise non-intrusive construction techniques—such as boring, micro-tunnelling, or moling —that avoid disturbance to the bed of the watercourse, in line with the approach assessed in the ES.
- 2.4.12 As noted above at paragraph 2.4.5, with regards to the crossing of the ditch within the Additional Land immediately north of the extension to the Existing Substation, a pre-construction site walkover will be undertaken in advance of mobilisation/any potential advance works to reconfirm the ecological baseline conditions, as set out in the Framework CEMP [REP10-014] (ref. Page 16C-13). The Framework CEMP [REP10-014] (ref. Page 16C-21) and OLEMP [REP10-012] (ref. paragraph 4.1.8(b)) requires that the crossing of watercourses where the presence of Water Vole have been determined by these pre-construction surveys, will be undertaken using boring, micro-tunnelling or moling methods, with appropriate setbacks from the top of the banks (depending on habitats and other individual ecological constraints).
- 2.4.13 Consequently, the proposed change does not give rise to any new or materially different effects in relation to Flood Risk, Drainage, and Water Resources. The mitigation measures set out in Table 3-4 of the **Framework CEMP [REP10-014]**, specifically those relating to non-intrusive crossing techniques, remain valid and require no amendment.

#### Additional Mitigation Requirements

2.4.14 Due to the conclusions set out above, no additional mitigation is required beyond that already set out within the ES and relevant management plans.

#### Conclusion

2.4.15 The proposed change does not result in any new, or changed, effects established by the ES. All previously identified effects and mitigation measures remain valid and applicable.

#### **Transport and Access**

#### Introduction

2.4.16 As stated in **Table 2-1**, the NMC enables a minor change to the location of the crossing of Newnham Drove, outside of the Order Limits assessed in the ES. The proposed change does not introduce any new receptors, alter existing environmental conditions, or change the nature or scale of the impacts assessed.

#### Assessment Summary

2.4.17 Although the location of the indicative crossing of Newnham Drove is proposed to move approximately 15m west of the existing Order Limits, the proposed change is not considered to result in any material change to the assessment presented in the ES. The receptor assessed in the ES (Newnham Drove) remains the same, and as such the receptor sensitivity remains unchanged. The proposed change does not change how this road may be crossed, or the extent of the crossing, meaning the magnitude of impact also remains the same as assessed in the ES.



2.4.18 Furthermore, all measures as set out in the Table 3-8 of the **Framework CEMP** [REP10-014] and the **Framework Construction Traffic Management Plan and Travel Plan [REP7-017]** are all still relevant to the revised crossing location.

#### Additional Mitigation Requirements

2.4.19 Due to the conclusions set out above, no additional mitigation is required beyond that already set out within the ES and relevant management plans. The Traffic Regulation Measures – Temporary Road Closures Plans and the Access and Rights of Way Plans have both been updated to reflect the amendment in the location of works on Newnham Drove in relation to extending the extent of the proposed temporary road closure and street works to facilitate the construction works further west along Newnham Drove. These are submitted with the NMC Application.

#### **Conclusion**

2.4.20 The proposed change does not result in any new, or changed, effects established by the ES. All previously identified effects and mitigation measures remain valid and applicable



## 3 Conclusions

3.1.1 As evidenced in this Report, it is considered that the NMC is non-material and does not result in any new, or changed, environmental effects (including those upon local people) established by the ES. All previously identified effects and mitigation measures remain valid and applicable. The NMC does not result in the need for a Habitats Regulations Assessment or any new, or additional, licences in respect of European Protected Species. Further, whilst additional land not already included in the Order Limits is proposed to facilitate the NMC, additional compulsory acquisition of land is not required.



## 4 References

- Ref-1 UK Government. (2015). The Infrastructure Planning (Interested Parties and Miscellaneous Prescribed Provisions) Regulations 2015, SI 2015/462. London: The Stationery Office. Available at:

  <a href="https://www.legislation.gov.uk/uksi/2015/462/contents/made">https://www.legislation.gov.uk/uksi/2015/462/contents/made</a> [Accessed 16 Oct. 2025].</a>
- Ref-2 Planning Inspectorate. (2024). Advice Note Seventeen: Cumulative Effects Assessment. [online] GOV.UK. Available at: https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-on-cumulative-effects-assessment [Accessed 16 Oct. 2025]
- Ref-3 UK Government. (2017). The Town and Country Planning (Environmental Impact Assessment) Regulations 2017, SI 2017/571. London: The Stationery Office. Available at: https://www.legislation.gov.uk/uksi/2017/571/contents [Accessed 16 Oct. 2025].
- Ref-4 UK Government. (2008). Planning Act 2008, c.29. Available at: https://www.legislation.gov.uk/ukpga/2008/29/contents [Accessed 16 Oct. 2025]



# **Appendices**



# Appendix A Letter from NGET



Sunnica Limited
2 Crossways Business Centre Bicester Road
Kingswood
Aylesbury
England
HP18 0RA

03/11/2025

Dear Sir/Madam,

#### Sunnica Energy Farm - Amendments Required to Connect at Burwell 400 kV

Sunnica Energy Farm is contracted to connect to National Grid Electricity Transmission's (NGET) network at NGET's Burwell 400kV substation. Following the evolution of NGET's connection design at Burwell substation, it has become necessary to amend the original point of connection outlined in the initial Sunnica Energy Farm Development Consent Order (DCO).

As a result, Sunnica Energy Farm will need to update its DCO to include the works required for connecting to an amended point of connection. This adjustment entails selecting an alternative location within the substation compound for the connection, with the final decision to be made following the Connections Reform Gate 2 process. Additionally, a new buried cable route will be established across NGET land to accommodate this change with NGET also providing an easement for the Sunnica Energy Farm cable route through its non-operational land.

NGET is the driver behind the change to update the point of connection and will continue to work closely with Sunnica Energy Farm to ensure effective coordination of the revised design.

Yours sincerely,

Development Director NGET



## Appendix B Ecological Appraisal Memo

AECOM	Sunnica Solar Farm Non-Material Change Application Ecological Appraisal Memo 27 October 2025
Site Name	Sunnica Solar Farm, Burwell Substation, Newnham Drove
Date of Visit	22 October 2025
Name and Role of Staff undertaking the visit	- Consultant Ecologist
Weather Conditions	13°C, dry, 5mph northeasterly wind, 80% cloud cover

#### Site Works Undertaken

An ecology walkover was carried out to confirm that the proposed extension of the Order limits, comprising Change 1 of the Non-Material Change Application, does not change the conclusions set out in **Chapter 8: Ecology and Nature Conservation** of the Environmental Statement (ES) **[APP-040]**) of the approved works and that no further mitigation, as secured by the Development Consent Order ('DCO'), is required.

**Figure 1** shows the proposed extension of the Order Limits (hereafter referred to as the 'Additional Land') and surrounding area subject to this ecological survey. The Additional Land consists of the existing Burwell Substation extension and adjoining land to the north which adjoins Newnham Drove.

The operational substation extension within the Additional Land was not accessible at the time of the survey, but habitats were visible through the fence and the lack of access did not present a limitation. The existing Burwell Substation extension only comprised gravel and hard-standing; habitats of no ecological value.

Where access was granted and was considered safe or was visible, a buffer of 50m from the Additional Land was included in the survey (as presented in **Figure 1**), hereafter referred to as 'the Survey Area'. Habitats were mapped using UKHab<sup>1</sup>, the standard method of environmental audit, which involves categorising different habitat types and habitat features within the surveyed area. The UKHab survey was extended to include presence or potential for presence of legally protected, notable<sup>2</sup>, or invasive species.

Given the limited habitats present, most focus was placed on searching for evidence of Badger (*Meles meles*) and Water Vole (*Arvicola amphibius*); however, the potential for all other protected or notable species was considered and searched for as required.

<sup>&</sup>lt;sup>1</sup> UKHab Ltd. (2023). The UK Habitat Classification Version 2.0. [online] Available at: https://www.ukhab.org [Accessed November 2024].

<sup>&</sup>lt;sup>2</sup> A notable habitat or species is one that is not legally protected but has a conservation designation, such as inclusion on the Natural Environment and Rural Communities (NERC) Act 2006 (His Majesty's Stationery Office (2006). Natural Environment and Rural Communities Act 2006. [online] Available at: https://www.legislation.gov.uk/ukpga/2006/16/contents [Accessed December 2024].

#### Survey results

#### UKHab

A habitat map showing the Additional Land and its immediate surroundings is presented in **Figure 1.** 

The Additional Land was dominated by hardstanding and gravel, classed in UKHab terms as artificial unvegetated, unsealed surface, in the form of the existing Burwell Substation site. The area outside of the existing Burwell Substation extension perimeter fencing (but within the Additional Land) to the north supported a recently profiled ditch and coarse gravel and bare earth, also classed as artificial unvegetated, unsealed surface, with areas colonised by sparsely vegetated urban land and species such as Bristly Oxtongue (Helminthotheca echioides), Wild Teasel (Dipsacus fullonum), and Creeping Thistle (Cirsium arvense). The small area in the northeastern extent of the Additional Land comprised unmanaged ruderal/ephemeral vegetation dominated by Creeping Thistle with abundant Mugwort (Artemisia vulgari), and frequent common nettle (Urtica dioica) and Greater Burdock (Arctium lappa). Photographs of the habitats are shown in Plate 1. The Additional Land is bounded to the east by the Burwell Substation, a solar farm with boundary ditch dominated by Common Reed (Phragmites australis) to the west, and arable fields with associated ditches to the north and south.

There were no notable or irreplaceable habitats or floral species present within the Survey Area.

The conclusions set out in **Chapter 8: Ecology and Nature Conservation** of the ES **[APP-040]** with regards to habitats remain valid and no further mitigation measures are required.

#### Protected species

While some tree loss is expected outside of the survey area as part of the wider works, the mitigation measures for this have already been outlined in the **Framework Construction Environmental Management Plan (FCEMP) [REP10-014]** and **Outline Landscape Ecological Management Plan (OLEMP) [REP10-012]** and have been deemed sufficient. Given there will be no additional tree loss off-site, and no trees were present within the Additional Land, roosting bats were not considered relevant to this walkover.

Given the limited habitats present, only Badger and Water Vole were considered to have the potential to be present in the Survey Area. No evidence (including setts, foraging signs or latrines) of Badger was seen within the Survey Area. The conclusions set out in **Chapter 8: Ecology and Nature Conservation** of the ES **[APP-040]** remain valid and no further mitigation measures are required.

The ditch between the existing Burwell Substation extension and the coarse gravel and bare earth which adjoins Newnham Drove in the northern extent of the Additional Land was wet at the time of the survey and supported latrines and freshly dug burrows belonging to Water Vole (shown in **Plate 2** and denoted as Target Note (TN) 1 and 2 on **Figure 1**). This ditch appears to have been created (or realigned) as part of the Burwell Substation extension works.

#### Conclusion

Measures to protect Water Vole, are set out in the FCEMP [REP10-014] (ref. Page 16C-13), which notes: "A pre-construction site walkover will be undertaken in advance of mobilisation/any potential advance works to reconfirm the ecological baseline conditions and to identify any new ecological risks. Updated species surveys, including bats, great crested newt, breeding birds, otter, water vole and badger, will be completed as appropriate to re-confirm the status of protected species identified, to inform mitigation requirements and support protected species licence applications, if required by Natural England." This measure is also set out in the OLEMP [REP10-012] (ref. paragraph 4.2.1). The FCEMP [REP10-014] (ref. Page 16C-21) and OLEMP **[REP10-012]** (ref. paragraph 4.1.8(b)) also note: "The crossing of watercourses where the presence of Otter and Water Vole have been determined, as well as the River Kennett, River Snail, Lee Brook, New River and Burwell Lode, will be undertaken using boring, micro-tunnelling or moling methods, with appropriate setbacks from the top of the banks (depending on habitats and other individual ecological constraints)." The recommended industry setback with regards to Water Vole is 10m from the top of the bank, as noted in Chapter 8: Ecology and Nature Conservation of the ES [APP-**0401**, which will be adhered with in the final Landscape and Ecological Management Plan that is prepared pre-construction.

The conclusions set out in **Chapter 8: Ecology and Nature Conservation** of the ES **[APP-040]** with reference to Water Vole remain valid and no further mitigation measures are required. The walkover did not identify any features within the Additional Land that would alter the conclusions presented in **Chapter 8: Ecology and Nature Conservation** of the ES **[APP-040]**, including the requirement for additional mitigation measures to those already stated within the **FCEMP [REP10-014]** and **OLEMP [REP10-012]** and secured by the DCO.

#### Plate 1:



Hard-standing and gravel inside Burwell Substation extension.



Coarse gravel and bare ground, partially colonised by ruderal/ephemeral vegetation.

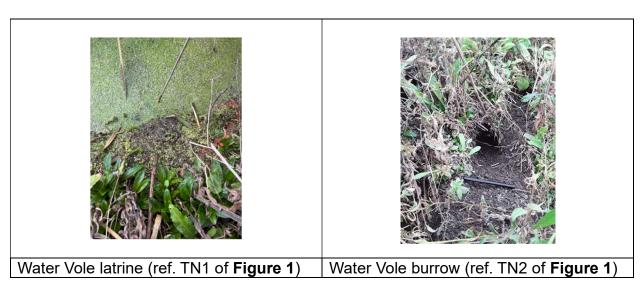


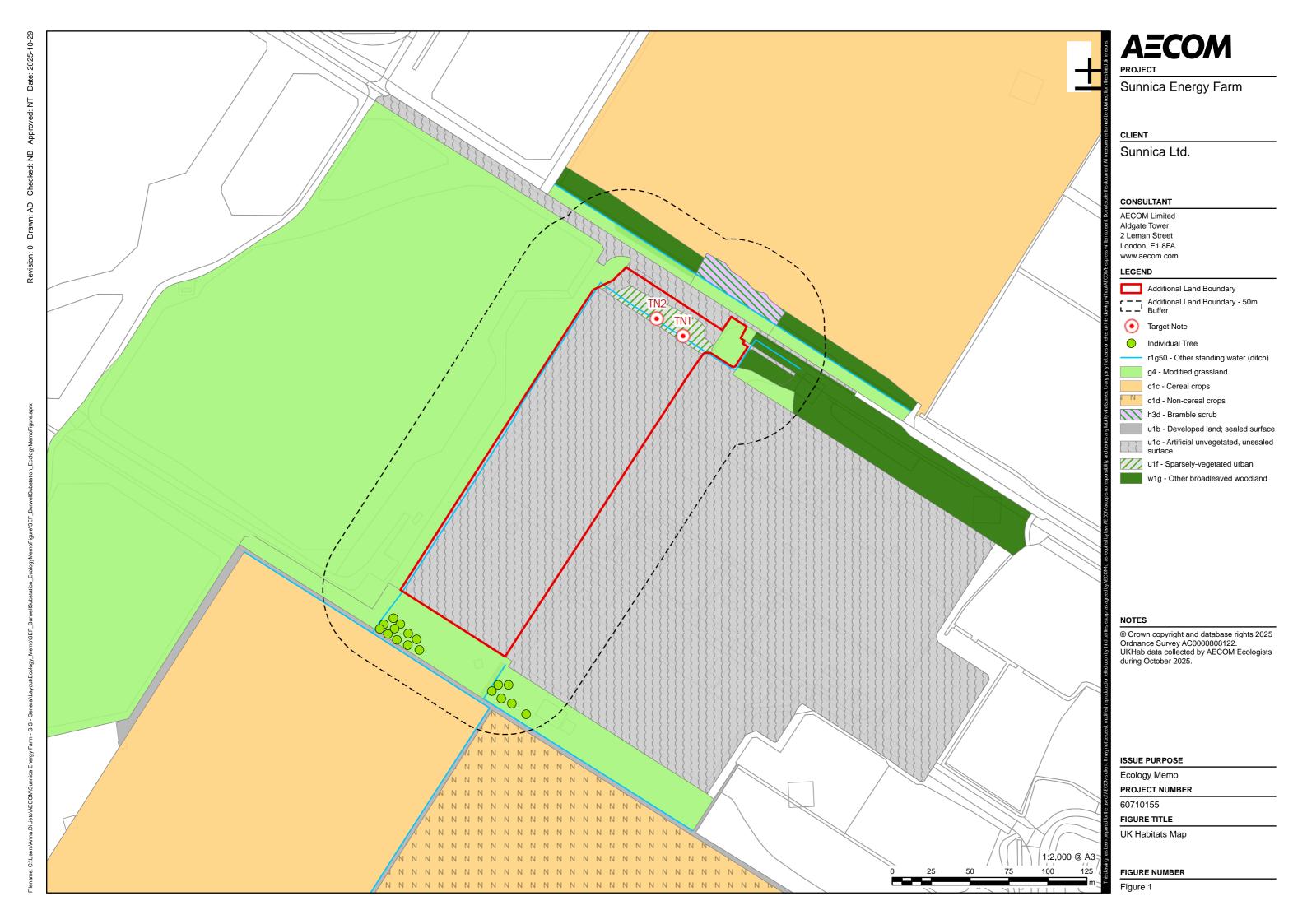
Wet ditch between the Burwell Substation extension and land to the north.



Unmanaged tall ruderal vegetation in the northeast of the Additional Land.

Plate 2:







## APPENDIX 3

#### **PLAN SHOWING PROPOSALS**

