

From: [REDACTED]
To: [Sunnica Energy Farm](#)
Subject: Objection to Sunnica Energy Farm Non-Material Change Application – Proposed Reduction in Consultees (Regulation 7(3))
Date: 10 January 2026 10:25:00

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I write to object to the proposal by Sunnica Limited to reduce the statutory consultees on its non-material change application for the Sunnica Energy Farm Order 2024 (the “Order”), as set out in the November 13, 2025 letter from Pinsent Masons LLP on behalf of Sunnica Limited.

1. Insufficient Consultation Risks Excluding Key Stakeholders

The applicant seeks to limit consultees to a small number of local authorities and a few other bodies directly identified with the Additional Land for the cable relocation. However, this approach risks excluding statutory consultees and specialist consultees whose expertise and oversight are necessary to fully understand and mitigate the impacts of the proposed change. The Planning Act 2008 and associated guidance require adequate consultation to ensure effective engagement and that environmental, heritage, safety and community interests are properly considered.

2. Potential Undermining of Planning Process Transparency and Participation

Reducing the number of consultees could undermine transparency in the development consent order (DCO) process. National guidance emphasises that consultation reports should explain how developers have complied with statutory pre-application consultation requirements and how responses have been considered. Limiting consultees at the non-material change stage may lead to critical issues being overlooked, and, by extension, diminish trust and confidence in the planning process among local communities and other stakeholders.

3. Precedent for Weakening Stakeholder Engagement

There is ongoing national debate and concern about reforms to the NSIP planning regime that would reduce statutory consultation requirements, including the role of statutory consultees more generally. Allowing this non-material change application to limit consultees risks establishing a precedent for further narrowing engagement, contrary to the underlying objectives of thorough, proportionate and inclusive consultation set out in planning policy and guidance.

4. Lack of Clear Justification for Exclusion of Certain Consultees

While the applicant asserts that only certain organisations are “relevant to the proposed non-material change”, there is insufficient justification in the application as to why other consultees should be excluded. The potential effects on environmental receptors, heritage assets, ecological systems, water management,

transport, and community interests should be assessed by the full range of consultees with the statutory remit to advise on these matters.

5. Impacts on Local Communities and Environment

Reducing consultee engagement could lead to material risks for local communities — including inadequate assessment of drainage, traffic routes, ecological networks, and cumulative impacts with the wider Sunnica Energy Farm. This is especially relevant where consents affect large infrastructure projects with regional implications.

The entire application has not provided accurate information, had many changes and goalposts moved, which confirms the poor quality of the application, as reported and advised by the planning inspectorate prior to NSIP approval

Conclusion and Request

For these reasons, I respectfully request that you:

Reject the proposed reduction in consultees under Regulation 7(3) of the Infrastructure Planning (Changes to and Revocation of Development Consent Orders) Regulations 2011.

Require full statutory consultation on this non-material change application to ensure robust and transparent scrutiny.

Ensure that all relevant statutory and specialist consultees are engaged before any decision is made.

Thank you for considering these representations. I would be grateful for confirmation that this objection has been received and will be taken into account in your determination of the non-material change application.

Yours sincerely,

Claudine Bateman

