

SUNNICA ENERGY FARM

EN010106

Non-Material Change Response

Suffolk County Council

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Glossary of Acronyms

<i>BESS</i>	<i>Battery Energy Storage Systems</i>
<i>DCO</i>	<i>Development Consent Order</i>
<i>DESNZ</i>	<i>Department for Energy Security and Net Zero</i>
<i>NMC</i>	<i>Non-Material Change</i>
<i>NSIP</i>	<i>Nationally Significant Infrastructure Project</i>
<i>SoS</i>	<i>Secretary of State</i>

“The Council” / “SCC” refers to Suffolk County Council.

Purpose of this Document

This document has been prepared by Suffolk County Council to respond to the consultation on the Non-Material Change application occurring between 4 December 2025 and 16 January 2026.

1 Introduction

- 1.1 SCC understands that the progressed Non-Material Change (“**NMC**”) application to the Sunnica Energy Farm Order 2024 (SI 2024/802) as corrected by the Sunnica Energy Farm (Correction) Order 2024 (SI 2024/1154) focuses solely on an amendment to the Order Limits nearby 400kV Burwell Substation to enable the cabling to connection to the substation via this additional land. SCC also understands that this additional land is land which has been developed since the Examination of the Sunnica Energy Farm closed in March 2023. Further, the Council recognises that this change is located entirely in Cambridgeshire.
- 1.2 Previously, SCC understood that the Sunnica Limited (the “**Applicant**”) did intend to submit a further, second, change as part of the application. As noted in correspondence between Pinsent Masons (on behalf of the Applicant) and the Secretary of State (“**SoS**”) for the Department of Energy Security and Net Zero (“**DESNZ**”) published on the Planning Inspectorate website on 20 November 2025. SCC understands that this proposed change was related to amending the Development Consent Order to address overlapping planning permissions. SCC is aware that a similar NMC was raised for the Longfield Solar Farm (EN010118) in Essex. The Applicant’s rationale for this change included the statement: “*to provide the Scheme with sufficient future value-adding flexibility in relation to adjacent land*”. As a result, SCC had concerns with the potential implications of this change. However, the Council further understands that this change has not been progressed because it is not deemed necessary and may come forward under a separate consenting regime at a later date. The Council will reserve further comments on this matter until the relevant time and through the relevant regime.

2 Planning Team

- 2.1 SCC has concerns regarding the reduction in consultees, as agreed by the SoS. Specifically, the Council would have expected the Town and Parish Councils which are hosting the infrastructure to be consulted. Town and Parish Councils are a vital part of Local Government and should be considered in determining applications for Nationally Significant Infrastructure Projects (“**NSIP**”).
- 2.2 It does not appear that the NMC has an impact on Battery Energy Storage System (“**BESS**”) matters, which are of critical concern to the Council.
- 2.3 As the NMC does not amend the Order Limits within Suffolk County Council’s administrative area and does not impact on BESS matters, the Council considers the change to be non-material and raises no objection to the NMC.