From:

To: Sunnica Energy Farm

**Subject:** Sunnica Unique Reference: 20030656

**Date:** 18 May 2022 15:51:49

## Planning Act 2008 (as amended)

Application by Sunnica Ltd for an Order Granting Development Consent for the Sunnica Energy Farm

Request by the Applicant in Respect of the Timing of the Preliminary Meeting / Examination

Unique ref number: 20030656

OBJECTION TO APPLICATION FOR A REVISED TIMETABLE FOR SUNNICA LTD.

We object very strongly to Sunnica's requested revised timetable for many reasons (see below) but especially because of the impact such a material change to the timetable will have on the ability of residents to engage with the scheme changes and the Examination.

- (i) The reason given for the delay request is **not** justified. It is dependent upon a new theoretical Grid extension option, which may not be technically feasible. Huge additional and further work is required to establish the feasibility and there appear to have been doubts about the feasibility previously. Surely, this is abuse of process, amongst other things.
- (ii) The new 'Option 3' is a different one, on a different site, to the old 'Option 3' proposed during the statutory consultation (which was also the original extension location proposed in the scoping report). This is causing confusion. Clarification is needed. Which of the two different 'Option 3' locations was previously considered?
- (iii) Over the course of the entire process, Sunnica have looked at multiple options for the Grid extension (3 options were proposed in the statutory consultation). Clearly, they had not yet completed this exercise, but submitted the DCO application anyway in November 2021. This is wholly unacceptable and detrimental to residents. The most viable option has yet to be determined. There may be other locations that need to be investigated but this is unknown. How can this be a 'near-term' project at this stage? It can't be and isn't!
- (iv) If the new 'Option 3' eventually is deemed to be technically feasible, Sunnica state that they do not expect further adverse effects on the environment for this option. BUT this hasn't been assessed or consulted upon. Another 'unknown'. Changes may be needed. For instance, Sunnica do not state where in the large 'West A' site they intend to site the new Grid extension. This could (and will!) impact ecology, heritage, landscape, noise, transportation / highways, rights of way, CPO etc. All of this needs to be established before any of it can be consulted upon. Sunnica's proposed rapid timetable is unsustainable, unrealistic and does not give adequate scope for

- consultation and/or proper consideration and response to the consultation.
- (v) It is unclear whether National Grid and Sunnica can work together to resolve this quickly and/or within the proposed rapid timeframe. Sunnica was first informed of this problem by National Grid on 10 March 2022 but as of 28 April 2022 formal reasons had not been produced by National Grid for Sunnica.
- (vi) Sunnica and National Grid seem to disagree and be at odds with each other. The Grid extension is a fundamental part of the scheme and should have been established prior to submission of the application. This is yet another aspect of this DCO application that is incomplete (as has been indicated by the local authorities, parish councils, and many other residents and stakeholders). There are already many parts of the DCO that cannot be assessed because of the lack of information and this is another item to add to that list. It is unreasonable for the applicant to suggest a further, as yet unassessed, change to the scheme to add to this list of 'unknown' information.
- (vii) The proposed rapid timetable for resolving this issue is over-optimistic and likely to result in further delays being necessary. This is unfair and it affects the ability of local residents to participate. Typically, Sunnica is suggesting the Examination should start at the beginning of peak holiday season, school summer holiday period, etc. Many residents have prebooked plans during this time. It is wholly unfair and prejudicial to expect residents <a href="https://www.who.num.net/w
- (viii) There is an unfair expectation and lack of consideration on the part of Sunnica with regard to the amount of time (and expense) that people have spent reviewing their DCO application documents. To suggest they will 'simply' issue revised DCO documents demonstrates a lack of appreciation of this. It will not be possible in some cases for these revised DCO documents to be re-reviewed by residents or experts during the proposed rapid timeframe. This will hinder people's ability to comment on the scheme and participate in the examination.

**SUMMARY:** In the unlikely event that the proposed timetable is allowed to be amended, it is essential and only fair that the ExA have regard to the prejudice caused by this change and the rushed timetable that Sunnica has proposed, to the detriment of residents, to assess this change. If a new, more realistic timetable, based on known information, cannot be determined, the application must be withdrawn and Sunnica must be required to repay residents' enormous costs.

Rachel Hood