

Appendix O Consultation Responses

1.1 Stakeholder responses and the Applicant's responses

Suffolk County Council, Cambridgeshire County Council, East Cambridgeshire District Council, West Suffolk Council

Applicant responses to issues raised

Theme	Issue	Summary of issue raised	Applicant's response
Consultation	Information	The councils consider that insufficient information has been presented at this stage to establish whether the proposed changes are material or non-material. Sunnica correctly state that this is a matter for the Examining Authority to decide and the Councils concur with this view.	Noted. The level of detail provided was to enable non-statutory consultation prior to submitting the Change Report to the Examining Authority. The Examining Authority will determine if the changes are material or non-material based on the information provided in the Change Report, should it be accepted into Examination.
Consultation	Information	In general, the Councils consider that insufficient information has been provided as to the nature of the changes and their resultant impacts. The use of technical jargon and references to items such as shunt reactors and busbars does not aid the reader to understand what the implications of their inclusion in the scheme are.	The Applicant considers the consultation document and content that it presented at the public exhibitions to be sufficient to comment on the proposed changes at a stage prior to the submission of a changes application to the Examining Authority. The Applicant has provided further detail within its changes application, including an appraisal of the likely environmental effects of each change. This appraisal can be viewed in chapters 3, 4 and 5 of this document. Should the Examining Authority decide to accept the changes application into the Examination, this document will be available to review and comment on through the Examination process. In response to comments received during the consultation, the Applicant uploaded definitions of terms included within the changes consultation document to its website.
Consultation	Information	The consultation material does not categorically state whether Option 3 is technically feasible. The Councils question whether further consultation will be necessary once this has been established.	Option 3 has been assessed as technically feasible by Sunnica. An application with the proposed technical changes has been submitted to NGESO and NGET on Monday 11 th July and their approval is expected in due course.
Consultation	Information	The consultation material does not provide any information in relation to any changes that will be required to the framework	Environmental information for each change is provided in chapters 3 to 5 of this Report. This has concluded that there will be no new or different significant

		control documents that accompanied the application as a result of the changes to the scheme. The Councils require this information in order to be able to fully consider the changes.	effects and, therefore, there is no requirement for additional mitigation. As a result, the current mitigation provided in the framework control documents are considered robust and will not require an update as a result of the proposed changes.
Consultation	Approach	In its letter of 26 May 2022 the ExA suggested that Sunnica consider holding a public meeting as part of the consultation. Two 'public exhibition' events have been proposed by Sunnica, however, both are located in Cambridgeshire despite the changes also affecting sites in Suffolk. A public exhibition differs from an open public meeting, which is likely to attract a higher level of participation.	The Applicant disagrees with this assessment. Public exhibitions enable anyone with an interest in the proposals to attend and speak to members of the project team directly about the issues that are most important to them in particular. A public meeting format would not have enabled all attendees to have this level of contact with the project team and would have been held over a shorter, less flexible time period. Although both exhibition locations were within Cambridgeshire, the locations were in close proximity to areas affected by the changes and people living within Suffolk were invited to each event. The Applicant does not consider this to have been an impediment to anyone taking part in the consultation.
Consultation	Approach	Sunnica's communication consultants, SEC Newgate UK Ltd, contacted the Councils and provided a copy of the exhibition invite letter. In their communication it was stated that the letter was being posted to the same zone that received booklets during the statutory consultation. However, Sunnica's Method Statement for this consultation states that Sunnica will be writing to approximately 140 homes and businesses. There appears to be a significant difference between the two geographic areas that have been written to. This is likely to have led to confusion in the community.	Having met with the local authorities prior to the start of the changes consultation, the Applicant amended its mailing area for the changes consultation letter and document to include additional areas close to the proposed substation changes. This involved writing to all residents living within a half mile radius of the substations affected by options 1, 2 and 3. This numbered 344 addresses. The Applicant also wrote to all persons and bodies notified of the acceptance of the application under Section 56 of the Planning Act 2008 and submitted its consultation notice [AS-0234] and notice of exhibitions [AS-0235] for acceptance into the Examination so that interested parties were made aware of the consultation. When publicising the exhibitions, the Applicant wanted to ensure that anyone else with an interest in the application was aware of the consultation. The letter stated that the consultation document was available to view online through the Sunnica website and in hard copy on request. The Applicant considers that the promotion of the consultation to a wider area demonstrates its commitment to publicising the consultation widely.

Transport	Vehicle movements	It is unclear what impact the changes will have on haulage routes. For example, will the changes to the substations at Sunnica West A, Sunnica East A and Sunnica East B require additional and/or larger equipment to be delivered to site than would have been expected under the original scheme? If so, how will this be facilitated? Equally, are there to be any additional maintenance and associated journeys to the above sites during operation?	The proposed changes will not impact on the proposed haulage routes; however, larger Abnormal Invisibile Load (AIL) vehicles will be required to transport the 400kV transformer to Sunnica West Site A, Sunnica East Site A and Sunnica East Site B only, should Option 3 be taken forward. Therefore, a tracking exercise (swept path analysis) for AILs has been undertaken on the identified routes which has demonstrated that manoeuvres, including over/under-sail, can be accommodated within the highways boundary in all but one location – the Mildenhall Road/Ferry Lane T-junction. A minor update to the Order Limits has been made at this location to accommodate the over-sail of the trailer at this junction.
Landscape and visual amenity	Assessment	The Councils consider that further information is required to fully understand the impacts (if any) of the proposed changes and as such the Councils may reach a different view.	Noted. Environmental information has been provided within this Report. Further detail is provided in chapters 3, 4 and 5.
Landscape and visual amenity	Assessment	From the information provided it is not clear what the implications of changes to the cables (moving from 4 x 132kV cables to a single 400kV) would be in terms of the trenches. Without details of the footprint and depth of the trenches the Councils are unable to assess the impact this might have on loss of vegetation as a consequence.	There are no changes to the parameters assessed within the Environmental Statement related to trenching. The single 400kV cable will be within the maximum parameters assessed within the Environmental Statement and therefore, no new or additional significant effects are anticipated as a result of any of the proposed changes. Further detail on the environmental assessment is provided in Chapters 4 of this Report.
Ecology	Construction	There are concerns relating to the cable route and hydrological implications, such as at Chippenham Fen, and directional drilling beneath the water courses associated with Havacre Deal and Nook CWS.	There are no changes to the parameters assessed within the Environmental Statement related to the non-intrusive crossings associated with Havacre Deal and Nook CWS or the two streams within Sunnica West Site B. In addition, there are no changes to the groundwater assessment presented in the Environmental Statement. Therefore, no new or additional significant effects are anticipated as a result of any of the proposed changes. Further detail on the environmental assessment is provided in Chapters 4 of this Report.
Ecology	Assessment	It is not clear from the information available whether changes associated with the onsite substations may result in	Changes in noise as a result of Option 3 would result in an increase in noise from combined solar infrastructure plant and the substation and battery storage areas

		<p>increases to staffing, noise, traffic and other disturbance. We would therefore expect adequate evidence to demonstrate the proposed changes will not alter the magnitude of impact / significance of effect of the scheme on biodiversity including on Stone Curlews as set out in Chapter 8 of the Environmental Statement [APP-040].</p>	<p>of no greater than 2 dB, at the closest modelled receptors. This is not anticipated to alter the magnitude of impact / significance effect of the Scheme on biodiversity, including Stone Curlews. There are no changes anticipated to staffing levels or vehicles as a result of the changes. Please see Chapter 5 of this Report for further information.</p>
Noise and vibration	Assessment	<p>With reference to the Pinsent Masons letter of 28 April 2022 to the Examining Authority, it is stated at Para 3.7 “.....We do not expect there to be any adverse effects on the environment beyond those identified in the Application already”. Para 3.13 states “The need for additional baseline surveys: None.” To date the Councils have not been satisfied by the information provided by Sunnica regarding either the baseline noise assessments or the assessment of adverse amenity impacts during the operational phase. There is therefore no confidence in the above statements.</p>	<p>Noted. Environmental information can be found in chapters 3, 4 and 5 of this report. In relation to noise, changes in noise as a result of Option 3 would result in an increase in noise from combined solar infrastructure plant at receptors nearest the substation and battery storage areas (R5, R6, R8, R9, R10, R11) of no greater than 2 dB. This difference in noise is not perceptible to the average human ear and would result in absolute noise levels that are no worse than a Low impact. Consequently, the new infrastructure associated with Option 3 would not result in additional significant noise effects.</p>
Noise and vibration	Assessment	<p>The consultation material indicates a change to the electrical infrastructure due to the introduction of 32/400kV transformers at substation locations within Sunnica East Site A and Sunnica East Site B and Sunnica West Site A and the proposal for the installation of a shunt reactor at Sunnica East Site B. To date no specific information has been provided by Sunnica regarding assessments of noise and vibration from these substations/transformers. Particularly, but not exclusively, the Councils are concerned that during operation shunt reactors are liable to relatively high sound levels at low frequencies. It will be necessary for information to be provided regarding the specification, design, sound mitigation and exact locations of all substation equipment</p>	<p>Environmental information can be found in Chapter 5 of this report. In relation to noise, changes in noise as a result of Option 3 would result in an increase in noise from combined solar infrastructure plant at receptors nearest the substation (including the Shunt Reactor) and battery storage areas (R5, R6, R8, R9, R10, R11) of no greater than 2 dB. This difference in noise is not perceptible to the average human ear and would result in absolute noise levels that are no worse than a Low impact. Consequently, the new infrastructure associated with Option 3 would not result in additional significant noise effects.</p> <p>Typically noise levels from Shunt reactors are less than 82 dBA (this depends on design and testing and determined according to IEC 60076-10). However, the Max sound power level should not exceed the following (tested/determined under conditions as stipulated in IEC 60076-10) levels which are the conditions</p>

		(including the proposed shunt reactor) and reports by competent and suitably qualified parties regarding the effects on receptors and necessary mitigation measures.	<p>for National Grid sites and have been used as the basis for the reporting set out in the Changes Report:</p> <ul style="list-style-type: none"> - 91 dB(A) Maximum for Main Unit/Tank. - 87 dB(A) Maximum for Cooler Bank. <p>The transformers and the shunt reactor would be subject to detailed design to determine the plant manufacturer and the final layout of the area. The Operational Environmental Management Plan (OEMP), based on the Framework OEMP [APP-126], that is brought forward for approval in detailed design will set out how the Scheme design and operational plant levels have been developed to mitigate and reduce effects to a minimum.</p>
Other	Changes application	If a modified application is submitted, we expect adequate evidence to demonstrate the changes proposed under Option 3 are not material, and that all documents to be updated accordingly (including EclA, landscape plans, CEMP and LEMP etc.).	Noted. The Examining Authority will determine whether the changes are material or non-material. The environmental information within chapters 3, 4 and 5 of this Report conclude that there are no new or significant effects as a result of the three proposed changes and therefore no new or additional mitigation is required. As such there is no intention to update the current suite of mitigation documents; apart from where identified in the relevant sections of this Report to ensure consistency across the suite of documents and in response to the procedural decisions of the ExA.

1.2 National Grid Electricity Transmission (NGET)

Applicant responses to issues raised

Theme	Issue	Summary of issue raised	Applicant's response
Design	Grid connection	As confirmed in NGET's Relevant Representation of 17 March 2022, the Option 1 connection to the NGET Burwell Substation included in the current DCO application is not technically feasible due to: - the amount of land required by the Promoter to carry this Option forward; - the planned extension of the Burwell Substation; and - NGET's license obligations. Therefore NGET fully supports the removal of Option 1 from	Sunnica requested evidence from NGET to support the response in the Relevant Representation. NGET provided Sunnica with a letter dated 11 th July with a statement by way of evidence. A copy of this letter is included in Appendix S.

		the DCO application along with the associated modifications.	
Design	Grid connection	<p>NGET has reviewed the Option 3 connection proposed by the Promoter for inclusion in the revised DCO application. This new Option is described in detail in the Promoter's letter of 28 April 2022 and in the booklet issued by the Promoter in connection with this Consultation. NGET are supportive of the addition of the Option 3 connection in principle (pending formal written approval of the technical feasibility of Option 3 by NGET) and invites the Promoter to enter into discussions with the relevant NGET engineers in order to facilitate written confirmation of technical feasibility in relation to Option 3.</p>	<p>Sunnica has entered into discussions with the relevant NGET engineers and submitted a complete set of documents via NGENSO on 11th July. Sunnica awaits a formal response on the Option 3 following the review of these documents.</p>
Other	Engagement	<p>NGET remains committed to working with the Promoter in relation to the inclusion of new Option 3 within the DCO application (alongside the existing Option 2) and to provide the Examining Authority with any further information that they may require during the examination process.</p>	<p>Sunnica welcomes this commitment to engagement from NGET.</p>

1.3 Environment Agency

Applicant responses to issues raised

Theme	Issue	Summary of issue raised	Applicant's response
Water resources	Flooding	<p>If Option 3 is added to the DCO application then a revised Flood Risk Assessment (FRA) or FRA Addendum will need to be submitted to assess the flood risk impacts of the proposed changes relating to this option. In particular, the consultation booklet indicates that option 3 would require changes to the proposed layout of the substations and transformers at Sunnica West Site A, Sunnica East Site A and Sunnica East Site B. This could result in changes to the proposed built footprint within the floodplain. As detailed in issue 1.2 of our Relevant Representations, the FRA needs to demonstrate that any built footprint within the floodplain can be compensated for to ensure there is no increase in flood risk elsewhere.</p>	<p>An FRA addendum is being prepared and will be submitted in due course which will incorporate the changes to the Scheme arising from Option 3 (if accepted by the Examining Authority) as well as other changes requested by the EA. However, the onsite substations within Sunnica West Site A, Sunnica East Site A and Sunnica East Site B are not located near floodplain areas and it is anticipated that there will be no material impact on flood risk. It is not expected to change the findings and conclusions of the FRA.</p>

1.4 Natural England

Applicant responses to issues raised

Theme	Issue	Summary of issue raised	Applicant's response
Air quality	Assessment	What changes will there be to transportation movements across the sites during the construction phase due to Changes 2 and 3, and consequent changes to emissions from vehicles which may impact designated sites sensitive to air pollution close to the Affected Road Network?	<p>There are no anticipated changes to transportation movements across the sites as a result of Change 2 and 3, therefore, no new or different significant effects are anticipated within the site or along the Affected Road Network. See chapters 4 and 5 of this report for more detail.</p> <p>AIL movements are not modelled in isolation as is standard practice and are included within the HDV movements considered within the assessment. Construction phase HDV movements have been modelled and are not anticipated to generate significant adverse impacts on local air quality. Air quality in the study area is good, with no identified exceedances of legal air quality objectives for pollutants of concern. The use of larger AILs under Option 3 to transport the 400kV transformer to Sunnica West Site A, Sunnica East Site A and Sunnica East Site A is therefore expected to have a negligible impact on local air quality. Moreover, there are no designated habitats within the vicinity of the identified AIL pinch points; the impact of larger AILs under Option 3 on designated habitats has therefore been deemed not significant.</p>
Ecology	Assessment	What will be the impact of Change 3 on levels of disturbance to Stone Curlew in and close to Sunnica East Sites A and B as a result of changed staff and vehicle movements, and changes to the timings or duration of works?	<p>There are no proposed changes to staff and vehicle movements, or changes to the timings. Therefore, it is not anticipated that there will be any change to the level of disturbance to Stone Curlew in and close to Sunnica East Sites A and B. See Chapter 5 of this report for more detail.</p> <p>The anticipated programme of the cable installation and the onsite substation works will increase from 30 to 50 weeks, which although an</p>

			<p>increase is still within the total 24 month construction programme that was assessed in the ES. All restrictions related to the timing of works to avoid ecology impacts during construction will be retained and incorporated into the phasing plan developed by the principal contractor.</p>
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1.5 Public responses and regard had to comments

The responses received from members of the public have been analysed and considered by the Applicant and are presented in this section according to the following themes. Each of these themes is presented individually below, along with the Applicant's response:

Location;	Ecology;
Land Use;	Landscape and Visual Amenity;
Design;	Transport and Access;
Consultation;	Human Health;
EIA Process;	Noise and Vibration;
Construction;	Compulsory acquisition and,
Operations;	Other

The sections are listed as set out above for ease of reference.

Location

Applicant's responses to comments received relating to location

Party	Issue	Summary of issue raised	Applicant's response
BT	Potential impact on infrastructure	BT has an exchange potentially impacted by your proposals, known as Isleham UAX (Unmanned Automatic eXchange).	The Applicant acknowledges the location of this apparatus and notes that it is currently situated outside of the Order limits. It is therefore not considered to be affected by the proposed change application.

Land Use

Applicant's responses to comments received relating to land use

Parties	Issue	Summary of issue raised	Applicant's response
Public comments, Snailwell Parish Council	Land requirements	Sunnica requires more land than originally planned for which left NGET with no alternative but to issue their Representation in order to protect their position in relation to infrastructure and land.	In their letter of 11 th July 2022 to Sunnica (Appendix S), NGET stated that 'the land requested by Sunnica for their substation to be provided pursuant to the DCO was larger than originally discussed between NGET and Sunnica'. It is accepted that the plot of land discussed in the meeting

			held on 20 th April 2020 is smaller than the area of land submitted as option 1 in the DCO application. The key word in the NGET statement is 'originally' as the plans submitted for the DCO were developed over many months following that meeting in April 2020 through the expert guidance from NGET engineers and with many iterations and during this process no indication was given that the land for option 1 was too large in all of the subsequent meetings.
Public comments	Land requirements	I don't understand the situation at Burwell. You say that National Grid won't allow you the land for Option 1. Do they plan on building on it? If they do, how will you connect to the Grid? Especially if Option 2 is no longer viable.	<p>NGET states that the land required for option 1 is not available for the following reasons:</p> <p>"that the land requested by Sunnica for their substation to be provided pursuant to the DCO was larger than originally discussed between NGET and Sunnica; and in addition, NGET must meet requirements to provide other connections at the Burwell Main Substation site. To facilitate this, as Sunnica is aware, NGET is undertaking an extension of the substation. The land required for this will mean that the Option 1 connection is not possible. The correct reference for option 1 is Land Plots 20-16, 20-17, 20-18, 20-19, 20-20 as shown on the Land and Crown Plans [rev1] (AS003). This does not affect Sunnica's connection agreement with NGET at the Burwell 400kV substation and bays remain allocated for the connection."</p> <p>Option 2 remains technically feasible.</p>
Public comments	Land requirements	Option 2 is preferred by NGET and might need to acquire further land. Will there be new land acquisition required to take wider and altered cable routes across the scheme. It is impossible to consult on the feasibility or otherwise of Option 2 on these grounds without Sunnica demonstrating the cumulative area of land now required along the routes	Option 2 does not require any increase in land and no additional land from that proposed in the submitted DCO documents.

		and the ownership/ acquisition of the new proposals.	
Public comments	Land requirements	Change 1 cannot be said to be a deletion because rights underground through the land are still required.	<p>The Applicant acknowledges that plots 20-16, 20-17, 20-18, 20-19 and 20-20 will remain within the Order limits as this land will still be required to facilitate the connection to the Burwell National Grid Substation under both Option and Option 3. The colour, and therefore acquisition type, of these plots will however change from pink (acquisition of all interests and rights) to the less imposition of blue (acquisitions of rights).</p> <p>In summary, the proposal is to alter the design by removing the transformer compound at this location due to changing the electrical configuration of the Scheme.</p>

Design

Applicant's responses to comments received relating to Scheme design

Parties	Issue	Summary of issue raised	Applicant's response
Public comments	Substation design	Change 3, we note that Sunnica East Site A (E33) is significantly larger than the site put forward in the Consultation Booklet 22 nd September to 2 nd December 2020.	The Applicant acknowledges that there was a 20% increase in Sunnica East Site A (E33) area from the Statutory Consultation to the Submission of the Application in November 2021 due to technical refinements prior to the submission of the Application. However, there is no change in the size of Sunnica East Site A (E33) area as in the application materials as a result of the proposed changes to the Scheme being proposed at this stage.
Public comments	Shunt reactor	What would installing a shunt reactor at Sunnica East Site B involve?	A shunt reactor is a piece of equipment designed to compensate for reactive power. This is required as part of the grid code. Installing the shunt reactor will involve preparing the ground with foundations in the same way as the rest of the substation compound, delivering the piece of equipment to site and installing it alongside the rest of the equipment.
Public comments	Design acceptability	The proposed changes are heavily	Option 2 continues to be technically feasible. NGET has stated that it supports

		reliant on approval from NGET. Without this approval the “Scheme” cannot move forward.	option 3 and NGET are supportive of the addition of the Option 3 connection in principle (pending formal written approval of the technical feasibility of Option 3 by NGET). Sunnica has entered into further discussions with the NGET engineers and submitted detailed documents for approval on 11 th July 2022.
Public comments	BESS/substation areas	What is the increase in size and capacity of the new batteries?	There will be no increase in size and capacity of the BESS areas as a result of the changes application. This element is not directly affected.
Public comments	Cable route	What are the changes to the cable route?	The cable route itself remains unchanged. It will continue to follow the same route as with the DCO submission documents. The specifications for a 400kV cable and associated works are likely to be in a smaller footprint than 132kV cable. However, the consideration of this change in the Changes Report has assumed the maximum parameters from the 132kV cable route options.
Public comments	Cable route	What does ‘larger cable’ actually mean?	It is not precisely clear what the context of the statement ‘larger cable’ is. Sunnica assumes that this reference is to option 3 replacing the 132kV cables with 400kV cables. The 400kV cables are described as ‘larger cable’ because they have a higher carrying capacity for electricity. In overall physical terms there will likely be less cables and therefore the footprint will be smaller overall than with the 132kV solution.
Public comments	Cable route	What are the benefits of using 400 kV cable? Why had 132 kV been chosen? Is 400 kV cable safe across such long distances? Will you be burying the cables underground or looking at overhead cables?	The benefits of using a 400kV cable are that the cable has the ability to carry more electricity at the higher voltage. This results in only one circuit being required and therefore a smaller potential footprint in terms of trench width and jointing bay and less direction drilling where open trenching solution is not possible. 132kV cable had been chosen as this provides for two circuits which would have given redundancy in the system should there have been a problem with one circuit as 50% of the power to the generating station would remain. On review Sunnica is willing to accept this risk now because Sunnica believes that any issue could be fixed relatively quickly and that the risk of damage occurring is relatively small. 400kV cable is safe to cross large distances and there is industry safety

			guidance which will be followed by Sunnica. The cables will be underground.
Public comments	Cable route	No comment has been made on the different insulation requirements for the 400kV cables if Option 3 is to proceed.	<p>The 400kV cables will be buried in trenches underground following industry guidelines. The cables will be installed in ducts, likely to be in trefoil formation and at a depth of more than 1m to the top of the highest duct. The cables themselves will come with insulation around the metal and the process of undergrounding the cables will provide further insulation through the material above and around the cables.</p> <p>This change is within the parameters (such as trench width and depth, working width, location of jointing bays) set out in Chapter 3: Scheme Description [APP-035] assessed in the ES submitted as part of the DCO application.</p>
Public comments	BESS/substation areas	Insufficient information has been provided as to the layout of the BESS/substation areas.	<p>The Applicant has provided illustrative layouts of the proposed 400kV Substations within this Report. Please see figures 5-1 to 5-6. In addition, in response to questions received during the consultation, the Applicant provided illustrative plans of the substation layouts at the public exhibition events and on its website.</p> <p>However, it is important to note that the Applicant is not requesting consent for the layout as shown on the illustrative figures and the environmental assessment in the Environmental Statement and the consideration of the changes in the Changes Report has been undertaken using the Rochdale Envelope based on the maximum parameters as outlined in Chapter 3 of the Environmental Statement and in the Design and Access Statement as provided in Appendix E and F of this Report, respectively.</p>
Public comments	BESS/substation areas	The additional infrastructure to be placed at the BESS substation areas has not been clearly explained.	The Applicant respectfully disagrees with this comment; however, additional information outlining the proposed changes is provided in Chapter 5 of this Report.
Public comments	BESS/substation areas	It is disingenuous to state that the substations would not be any bigger than in the original plans when they will be. Rather, they will be	Noted. However, the assessment within the Environmental Statement is based on the maximum parameters outlined in Chapter 3 of the Environmental Statement and in the Design and Access Statement rather than an illustrative design.

		within the maximum parameters allowed.	
Public comments	BESS/substation areas	The proposed substations would be huge.	Plans showing the illustrative before and after layouts are shown in figures 5-1 to 5-6 of this Report. The environmental assessment in the Environmental Statement and the consideration of the changes in the Changes Report has been undertaken using the Rochdale Envelope and based on the maximum parameters as outlined in Chapter 3 of the Environmental Statement and in the Design and Access Statement as provided in Appendix E and F of this Report, respectively, and the changed design is within these parameters. There are not anticipated to be any new or different significant effects as a result of the proposed change. See Chapter 5 for further information.
Public comments	BESS/substation areas	What are shunt reactors? How big are they? Will they be screened?	<p>A shunt reactor is a device that helps to ensure that the voltage of the energy remains at a suitable level to be used in the national electricity grid.</p> <p>It does this by compensating for reactive power within an electricity system. Reactive power is needed within the system to facilitate the transfer of electricity. It must be created and 'compensated' (absorbed) to maintain a certain level of voltage.</p> <p>When installed, shunt reactors are similar in size and appearance to electricity transformers, and will benefit from the same landscape screening as part of the Sunnica East Site B on-site substation. They will be within the overall parameters of the substation areas as provided for in Chapter 3 of the Environmental Statement and in the Design and Access Statement as provided in Appendix E and F of this Report.</p>
Public comments	BESS/substation areas	What is the difference between a shunt reactor and a transformer?	<p>A shunt reactor is a device that helps to ensure that the voltage of the energy remains at a suitable level to be used in the national electricity grid.</p> <p>It does this by compensating for reactive power within an electricity system. Reactive power is needed within the system to facilitate the transfer of electricity. It must be created and</p>

			<p>'compensated' (absorbed) to maintain a certain level of voltage.</p> <p>When installed, shunt reactors are similar in size and appearance to electricity transformers. A transformer is a structure which houses a device used to transform electricity by increasing or reducing its voltage.</p>
Public comments	BESS/substation areas	The illustrations of the shunt reactor show glass disc insulator strings along the visible cables. What insulation strings are needed in a 400kV system?	Insulator strings will be required for the 400kV installation. These strings can be specified using ceramic, glass, porcelain or polymeric insulators, with ceramic and glass being the most commonly used, because of their lower costs. Porcelain or polymeric insulators are normally only used in onerous environmental conditions, which are not expected for the Scheme. The selection of the technology is normally made at detailed design stage and not at the planning level design.
Public comments	BESS/substation areas	The rationale for the inclusion of the shunt reactor is not clear. Sunnica representatives have said that it is required during commissioning. In this case it is also required if Option 2 were to proceed and is not specific to Option 3. Why is it there?	<p>A shunt reactor is a device that helps to ensure that the voltage of the energy remains at a suitable level to be used in the national electricity grid.</p> <p>It does this by compensating for reactive power within an electricity system. Reactive power is needed within the system to facilitate the transfer of electricity. It must be created and 'compensated' (absorbed) to maintain a certain level of voltage.</p> <p>When installed, shunt reactors are similar in size and appearance to electricity transformers. And will benefit from the same landscape screening as part of the Sunnica East Site B on-site substation.</p> <p>The reactive power compensation for Option 2 was always going to be a requirement. Sunnica was proposing to provide the reactive power compensation through the inverters in the Scheme or to procure it directly from National Grid directly. The shunt reactor provides an additional solution to procure for the reactive power compensation.</p>
Public comments	BESS/substation areas	It is unclear if a shunt reactor will be installed at each of the three locations.	A shunt reactor will only be installed at the Sunnica East Site B on-site substation.

Public comments	BESS/substation areas	Can you please provide detailed confirmation of the building/structure size now required across all the proposed sites?	<p>The maximum footprint of each on-site substation is as described within the Applicant’s DCO application. This is:</p> <ul style="list-style-type: none"> • Sunnica East Site A: 85m by 55m footprint, 10m in height. • Sunnica East Site B: 85m by 130m footprint, 10m in height. • Sunnica West Site A: 85m by 130m footprint, 10m in height. <p>Further information on the on-site substations is given in Chapter 3: Scheme description of the Environmental Statement [APP-035]. The Applicant has provided further information on its proposed changes to the on-site substation arrangements within Chapter 5 of this document.</p>
Public comments	Design changes	Are the proposed changes technically feasible?	<p>Sunnica has confirmed that the changes are technically feasible. Sunnica is working with NGET to secure approval from NGET that their engineers confirm that the changes are technically feasible. NGET is supportive of the addition of the Option 3 connection in principle (pending formal written approval of the technical feasibility of Option 3 by NGET) and has invited Sunnica to enter into discussions with the relevant NGET engineers in order to facilitate written confirmation of technical feasibility in relation to Option 3. Sunnica has entered into further discussions with the NGET engineers and submitted detailed documents for approval on 11th July 2022.</p>
Public comments	Grid connection	Why did Sunnica hold a public consultation when based on no written confirmation from the operator of the grid connection essential to the scheme? Please explain your grid connection offer.	<p>Sunnica has confirmed that the changes are technically feasible. Sunnica is working with NGET to secure approval from NGET such that their engineers confirm that the changes are technically feasible.</p> <p>NGET is supportive of the addition of the Option 3 connection in principle (pending formal written approval of the technical feasibility of Option 3 by NGET) and has invited Sunnica to enter into discussions with the relevant NGET engineers in order to facilitate written confirmation of technical feasibility in relation to Option 3. Sunnica has entered into further discussions with the NGET engineers and submitted detailed documents for approval on 11th July 2022.</p>

			Once technical approval happens, the Applicant would seek to remove Option 2 from the Application. The changes to the Application sought by the Applicant therefore retain flexibility to deliver either Option 2 or Option 3. This flexibility has enabled Sunnica to continue to progress the consultation ahead of receiving formal written approval from NGET regarding Option 3.
Public comments	Grid connection	Why is Option 1 still Option 1 if it isn't technically feasible?	Option 1 is a name given by the Applicant to one of its options for facilitating the Scheme's connection to the national electricity grid. The designations 'Option 1', 'Option 2' and 'Option 3' do not express ranking of the Applicant's preference. Subject to NGET confirming that it is feasible, the Applicant's preferred option would be Option 3.
Public comments	Grid connection	Option 3 was removed following the statutory consultation. Why is it now being considered?	The Burwell National Grid Substation extension 'Option 3' referred to in the statutory consultation booklet was not taken forward within the Applicant's Development Consent Order application. Therefore, this option (as described during the pre-application statutory consultation) does not form part of the Scheme proposals being examined. The Option 3 detailed within this document is distinct from the Option 3 considered prior to submission of the DCO application. This option involves the use of amended substation and transformer arrangements at Sunnica West Site A, Sunnica East Site A and Sunnica East Site B alongside a shunt reactor at Sunnica East Site B to convert the power from the Scheme to 400kV and allow for a connection to be made to the Burwell National Grid Substation using a 400kV underground cable.
Public comments	Grid connection	You still must confirm that Option 3 is technically feasible.	That is correct. The Applicant is continuing discussions with NGET with a view to confirming that NGET has confirmed the technical feasibility of Option 3. Once this happens, the Applicant would seek to remove Option 2 from the Application. The changes to the Application sought by the Applicant therefore retain flexibility to deliver either Option 2 or Option 3.
Public comments	Grid connection	Please explain more details about what is needed to confirm the technical feasibility of	Sunnica has confirmed that the changes are technically feasible. Sunnica is working with NGET to secure approval from NGET that their engineers confirm

		Option 3 and when you are likely to know the outcome.	that the changes are technically feasible and submitted detailed documents for approval on 11 th July 2022 and a response is expected in due course.
Public comments	Grid connection	Option 3 is still awaiting National Grid’s approval, which could take weeks; and if not accepted, the plan would revert to the apparently ‘unacceptable’ Option 2 – very contradictory! Why wasn’t Option 3 chosen in the first place?	Option 3 wasn’t chosen in the first instance because it does not allow for any redundancy in the system. At 132kV there are two circuits and this enables at least 50% of the plant to be operating in the case that one circuit were to fail which is not possible for 400kV. Option 3 wasn’t chosen in the first instance as this risk was deemed to be unacceptable. On review Sunnica is willing to accept this risk now because Sunnica believes that any issue could be fixed relatively quickly and that the risk of damage is relatively small. Sunnica submitted detailed documents for approval on 11 th July 2022 and is awaiting a formal response.
Public comments	Grid connection	Why has the grid connection offer been withdrawn and why are the changes required now?	The grid connection offer has not been withdrawn. The changes are required now because of a representation made by NGET. NGET state that the land required for option 1 is not available for the following reasons: “that the land requested by Sunnica for their substation to be provided pursuant to the DCO was larger than originally discussed between NGET and Sunnica; and in addition, NGET must meet requirements to provide other connections at the Burwell Main Substation site. To facilitate this, as Sunnica is aware, NGET is undertaking an extension of the substation. the land required for this will mean that the Option 1 connection is not possible. The correct reference for option 1 is Land Plots 20-16, 20-17, 20-18, 20-19, 20-20 as shown on the Land and Crown Plans [rev1] (AS003). This does not affect Sunnica’s connection agreement with NGET at the Burwell 400kV substation and bays remain allocated for the connection.” The changes are required to enable option 3.
Public comments	Grid connection	What happens if Option 3 proves not to be feasible? Will	If Option 3 proves not to be technically feasible then Option 2 will be implemented.

		there be other new options?	
Public comments	Grid connection	It is not known if Options 2 and 3 are technically feasible which means there is a risk factor.	Option 2 is technically feasible. The Option 3 connection is approved in principle by NGET (pending formal written approval of the technical feasibility of Option 3 by NGET engineers).
Public comments	Grid connection	You may end up with a scheme that can't plug its energy into the Grid. How will this work?	Option 2 is technically feasible. The Option 3 connection is approved in principle by NGET (pending formal written approval of the technical feasibility of Option 3 by NGET engineers).
Public comments	Grid connection	Why haven't the various grid options all been reviewed earlier in the design process?	National Grid only made Sunnica aware that the land at Burwell extension was not available and that the Option 1 was therefore not technically feasible after the DCO submission had been made. Option 2 requires the use of compulsory purchase powers over third party land. In the light of this new information Sunnica reviewed all potential options again and determined that the risk involved with the lack of redundancy in having a single circuit with a 400kV cables versus two circuits with 132kV cables was acceptable given that this would avoid such compulsory acquisition requirements.

Consultation

Applicant's responses to comments received relating to the consultation

Parties	Issue	Summary of issue raised	Applicant's response
Parish Council Alliance, Chippenham Parish Council, Isleham Parish Council, Worlington Parish Council public comments, Matt Hancock MP, Lucy Frazer MP, Say No to Sunnica	Consultation materials	The consultation material contains insufficient information to be able to comment on the changes as it is not possible to assess, based on the information provided, the impact of the change on local residents and the local environment.	The Applicant considers the consultation document and content that it presented at the public exhibitions to be sufficient to comment on the proposed changes at a stage prior to the submission of a changes application to the Examining Authority. The Applicant has provided further detail within its changes application, including an appraisal of the likely environmental effects of each change. This appraisal can be viewed in chapters 3, 4 and 5 of this document. Should the Examining Authority decide to accept the changes application into the Examination, this document will be available to review and comment on through the Examination process.

Matt Hancock MP, Lucy Frazer MP	Consultation materials	There is no visual representation of the substations within the consultation document	In response to questions received during the consultation, the Applicant provided illustrative plans of the substation layouts at the public exhibition events and on its website. As the proposed substation changes would be within the maximum specified in the Applicant's DCO application as submitted, the Applicant considers the photomontages [APP-215 to APP-232] to still represent the visual impact of the proposed Scheme including the substation arrangements.
Parish Council Alliance, Chippenham Parish Council, Snailwell Parish Council	Consultation materials	The pictorial evidence provided was weak. Cross sections on height and appearance were not clear or put up on the display boards.	The Applicant considers the illustrations that it has provided sufficient to understand the scope of the proposed changes. In response to questions received during the consultation, the Applicant provided illustrative plans of the substation layouts at the public exhibition events and on its website. As the proposed substation changes would be within the maximum specified in the Applicant's DCO application as submitted, the Applicant considers the photomontages [APP-215 to APP-232] to still represent the visual impact of the proposed Scheme including the substation arrangements.
Public comments	Consultation materials	A5 materials are too small, booklets should be A4 in size.	The Applicant provided the consultation document in A4 format on request and during the exhibition events. The consultation document was available in a variety of formats including A5, A4 and digitally online.
Public comments	Consultation materials	Clarity of the colour chart on such a small-scale map is very difficult to differentiate.	The Applicant provided copies of the consultation document in alternative formats on request including A4 and digitally. The Applicant considers the information presented to be sufficient to comment on the proposed changes prior to the submission of a changes application to the Examining Authority. The Applicant has provided further detail within chapters 3, 4 and 5 of this document.
Public comments	Consultation materials	The pages in the consultation booklet are not numbered.	The Applicant notes this comment. No references to page numbers were made within the consultation document itself.
Public comments	Consultation materials	Town, village and road names do not appear on maps in the consultation booklet.	The plans within the consultation document are based on the parameter plans [APP-135] and [APP-136] accepted into the Examination. To

			assist with viewing the Scheme in context, the Applicant provided a copy of the Scheme location plan [APP-129] within the consultation document.
Public comments	Consultation materials	The BESS sites are not labelled in the consultation booklet.	The battery energy storage system (BESS) element of the Scheme was not the subject of the changes consultation and therefore the consultation document does not focus on this. The BESS/substation sites are labelled within the document as the locations of Change 3.
Public comments	Consultation materials	The information presented is not clear enough to allow me to respond.	The Applicant considers the consultation document and content that it presented at the public exhibitions to be sufficient to comment on the proposed changes at a stage prior to the submission of a changes application to the Examining Authority. The Applicant has provided further detail within its changes application, including an appraisal of the likely environmental effects of each change. This appraisal can be viewed in chapters 3, 4 and 5 of this document. Should the Examining Authority decide to accept the changes application into the Examination, this document will be available to review and comment on through the Examination process.
Public comments	Consultation materials	A web link in the online version of the consultation booklet did not work.	The web link within the consultation document was correct. Due to a line break in the document, the digital version weblink did not work when clicked on. The same link to the National Infrastructure Planning website is available elsewhere on the Applicant's website.
Public comments	Consultation materials	The consultation notice lacks detail.	The Applicant considers the information provided in the notice to have been sufficient to enable participation in the consultation.
Public comments	Consultation materials	Who is 'the promoter' referred to in the consultation booklet?	Reference to the 'the promoter' within the consultation document is a quotation from NGET's relevant representation submitted to the Secretary of State [RR-1289] . This refers to the Applicant (Sunnica Ltd).
Public comments	Consultation materials	There is insufficient information on a 'shunt reactor' to comment on the consultation.	In response to questions, the Applicant provided information on the purpose of the proposed shunt reactor outlined as part of Change 3. This included uploading an explainer document to the Sunnica website.

Public comments	Consultation materials	The illustrative drawings are of little use as they show the substation areas in isolation, a 3D computer generated image would be better.	The Applicant considers the illustrations that it has provided sufficient to understand the scope of the proposed changes. In response to questions received during the consultation, the Applicant provided illustrative plans of the substation layouts at the public exhibition events and on its website. As the proposed substation changes would be within the maximum specified in the Applicant's DCO application as submitted, the Applicant considers the photomontages [APP-215 to APP-232] to still represent the visual impact of the proposed Scheme including the substation arrangements.
Public comments	Consultation materials	There are no 'before' and 'after' visualisations so we have no way of knowing if the Shunt Reactor and its substantial brick-built transformer will constitute material change.	The Applicant considers the illustrations that it has provided sufficient to understand the scope of the proposed changes. In response to questions received during the consultation, the Applicant provided illustrative plans of the substation layouts at the public exhibition events and on its website. As the proposed substation changes would be within the maximum parameters specified in the Applicant's DCO application, the Applicant considers the photomontages [APP-215 to APP-232] to still represent the visual impact of the proposed Scheme including the substation arrangements.
Public comments	Consultation materials	The illustrative elevations did not have any explanatory notes.	The illustrative elevations were brought to the exhibitions by the Applicant and members of the project team were available to answer questions relating to the illustrations at these events. The illustrations were also uploaded to the Sunnica website and anyone with questions about the illustrations could call or email the project team using the contact details available on the website and consultation document.
Cambridgeshire and Peterborough Combined Authority	Consultation materials	The Applicant's letter to the Examining Authority of 28th April states: "Option 3 was considered prior to the Application being submitted but it was previously determined that it was preferential to have two 132kV circuits rather than a single 400kV circuit to mitigate the effect of failure	National Grid only made Sunnica aware that the land at Burwell extension was not available and that the Option 1 was therefore not technically feasible after the DCO submission had been made. Option 3 wasn't chosen in the first instance because it does not allow for any redundancy in the system. At

		<p>in a single 400kV circuit. Sunnica now considers that the risk profile of failure of a single 400 kV circuit is acceptable and therefore is willing to proceed with the connection type.” The Proposed Changes consultation documentation is deficient in that it does not address this risk issue at all, neither explaining the previously assumed risk, or the change in circumstances (beyond the removal of Option 1) that led to the change in acceptable risk profile.</p>	<p>132kV there are two circuits and this enables at least 50% of the plant to be operating in the case that one circuit were to fail which is not possible for 400kV. Option 3 wasn’t chosen in the first instance as this risk was deemed to be unacceptable.</p> <p>Option 2 requires the use of compulsory purchase powers over third party land. In the light of this new information Sunnica reviewed all potential options again and determined that the risk involved with the lack of redundancy in having a single circuit with a 400kV cables versus two circuits with 132kV cables was acceptable given that this would avoid such compulsory acquisition requirements.</p> <p>On review Sunnica is willing to accept this risk now because Sunnica believes that any issue could be fixed relatively quickly and that the risk of damage is relatively small. Sunnica submitted detailed documents for approval on 11th July 2022 and is awaiting a formal response.</p>
Public comments	Consultation events	The consultation events were organised 7 days into the consultation period.	The Applicant organised the consultation events in response to comments made by the Examining Authority [PD-008] . The Applicant arranged the dates so as to allow two weeks following them for anyone to make a response and considers the notice period given (in excess of 7 days) to have been suitable. The consultation arrangements also allowed for anyone to obtain a hard copy of the consultation document on request, collect a copy of the consultation document from a deposit point, and to contact the project team using the Freephone, Freepost or email. The consultation was not therefore only dependent upon the public exhibitions.
Public comments	Consultation events	The consultation events should not have been held on consecutive days.	The Applicant disagrees, given the consultation events were not the only way of accessing information during the consultation. The Applicant made the consultation document available on request to anyone who was not able to attend the exhibitions and continued to

			take questions by email and using the Freephone telephone number.
Public comments, Isleham Parish Council, Worlington Parish Council	Consultation events	The consultation venues were not accessible by public transport.	The Applicant acknowledges that the rural location of the area means that public transport options are not always regular and available to all. The locations of the two consultation events were chosen for their proximity to the changes.
Parish Council Alliance, Chippenham Parish Council, Snailwell Parish Council, public comments, Matt Hancock MP, Lucy Frazer MP	Consultation events	The consultation events were organised at too short notice.	The consultation events were organised in response to a recommendation received from the Examining Authority. The Applicant gave in excess of 7 days' notice for the two events, wrote to over 11,000 addresses to promote the events and submitted its invitation letter to the Examining Authority to allow interested parties to be notified. When this notice was published, anyone who has signed up for updates through the National Infrastructure Planning website would have received an email update. The Applicant considers this to be appropriate notice to the events. The Applicant made the consultation document available on request to anyone who was not able to attend the exhibitions and continued to take questions by email and using the Freephone telephone number.
Parish Council Alliance, Snailwell Parish Council	Consultation events	The events were poorly promoted and relied on parish councils to advertise them.	The Applicant disagrees with this assessment. The Applicant wrote to over 11,000 addresses to promote the events and submitted its invitation letter to the Examining Authority to allow interested parties to be notified. The Applicant considers this to be appropriate promotion for the events. The Applicant contacted parish councils separately to notify them of the events and to invite parish councillors to preview sessions held ahead of each event. This was not a substitute for the Applicant's wider promotion of the events but supplementary to it.
Parish Council Alliance, Chippenham Parish Council, Snailwell Parish Council	Consultation events	A banner promoting the event arrived too close to the event.	The Applicant received the request for a banner only a short time prior to the event and in the time available produced and shipped the banner to Chippenham Parish Council in advance of the event. This was done to answer a request by the parish council and was supplementary to the Applicant's wider promotion of the events which included

			writing to over 11,000 addresses to promote the events and submitting an invitation letter to the Examining Authority to allow interested parties to be notified. The Applicant considers this to be appropriate promotion for the events.
Parish Council Alliance, Chippenham Parish Council, Snailwell Parish Council, Worlington Parish Council	Consultation events	The events were held at times that made it difficult for people to attend.	The events were held across two days from mid-afternoon into the early evening in common with many similar events, including those held during the non-statutory consultation. Anyone who was unable to attend the events was able to request a hard copy of the document and to contact the applicant using email or the Freephone telephone number. The consultation document was also available through the Applicant's website throughout the consultation.
Parish Council Alliance, Chippenham Parish Council, Snailwell Parish Council	Consultation events	The public exhibitions should have been in a group meeting, question and answer format.	The Applicant disagrees with this assessment. Public exhibitions enable anyone with an interest in the proposals to attend and speak to members of the project team directly about the issues that are most important to them in particular. A public meeting format would not have enabled all attendees to have this level of contact with the project team and would have been held over a shorter, less flexible time period.
Parish Council Alliance, Chippenham Parish Council, Snailwell Parish Council, public comments	Consultation events	Members of the project team were unable to answer questions asked.	The Applicant has tried to answer all questions that it has received at the exhibitions and those that it has received by email and telephone. It is not possible to answer some questions relating to detailed design aspects at this stage as these will be confirmed subject to the Applicant receiving development consent. In response to questions regarding the environmental impacts of the proposed changes, the Applicant has provided further detail on this as part of its changes application. Further information, including an appraisal of the effects of each of the changes can be found in chapters 3, 4 and 5 of this document.
Public comments	Consultation events	The consultation events were too short.	The Applicant considers two four-hour events to have been of sufficient length.
Public comments, Matt Hancock MP,	Consultation events	The consultation events were both in Cambridgeshire and not in Suffolk.	Although both exhibition locations were within Cambridgeshire, the locations were in close proximity to areas

Lucy Frazer MP, Say No to Sunnica, Worlington Parish Council			affected by the changes and people living within Suffolk were invited to each event. The Applicant does not consider this to have been an impediment to anyone taking part in the consultation.
Public comments	Consultation events	The consultation events should have been held at a weekend.	The Applicant considers the timings of the events to have been appropriate. The events were held across two weekdays from mid-afternoon into the early evening in common with many similar events, including those held during the non-statutory consultation. Anyone who was unable to attend the events was able to request a hard copy of the document and to contact the applicant using email or the Freephone telephone number.
Public comments	Consultation events	The consultation banners repeated information already in the consultation booklet.	The consultation information was consistent across the document and consultation banners as the consultation document was written to support people in responding to the consultation without needing to attend either of the consultation events.
Public comments, Snailwell Parish Council	Consultation events	The illustrative drawings of the substations were not available to those who missed the exhibitions and who do not have internet access.	The Applicant brought the illustrative drawings to the public consultation events in response to questions received during the consultation. The purpose of these drawings was the help explain the information that was set out in the consultation document and therefore the drawings were not essential to understanding the changes. Within its changes application, the Applicant has provided illustrations within chapter 6 of this document. It should be noted however that the proposed substation changes would be within the maximum parameters specified in the Applicant's DCO application.
Public comments	Consultation events	None of the representatives at the events were able to talk about the changes in the cable as proposed in Option 3.	The Applicant does not agree with this assessment. Representatives were present at each event who were able to answer questions relating to the cable route. At this time it may not be possible to provide certain specific details about the cable as the Applicant has carried out an assessment of effects within a set of maximum parameters (the Rochdale Envelope approach). This ensures that the environmental effects of the proposals have been adequately considered

			ahead of detailed design being concluded. The Applicant has provided further detail on its proposed changes to its grid connection cable within this document. Further information can be found in chapter 5.
Isleham Parish Council	Consultation events	The main exhibition periods provided no opportunity for interested parties to engage in meaningful dialogue	The Applicant does not agree with this assessment. Anyone attending the exhibitions could view changes relating to the proposed changes and speak to members of the project team about them.
Parish Council Alliance, Chippenham Parish Council, Snailwell Parish Council	Consultation arrangements	The distribution of information was not explained to the Parish Council, we did not know who got booklets, emails or letters.	The Applicant set out its proposed approach to the changes consultation in its method statement to the Examining Authority [AS-0233] . This included details of the proposed distribution of consultation materials. Prior to the start of the changes consultation, the Applicant met with the four host local authorities to set out its consultation approach. In response to comments received during this meeting and from the Examining Authority [PD-008] , the Applicant amended its consultation proposals as set out in chapter 2 of this document. The project team also responded to questions relating to the distribution of information during the preview sessions held prior to each of the public exhibitions.
Parish Council Alliance, Chippenham Parish Council, Snailwell Parish Council, Worlington Parish Council, Say No to Sunnica	Consultation arrangements	We are reserving our position as to if this is or is not a material change until after further and better details have been provided and that this important question cannot be determined on the information provided to date.	The Applicant notes this point. Should this document be accepted into the Examination, anyone who has registered as an interested party will be able to review and comment on the proposed changes and the Applicant's appraisal of their environmental effects. It will ultimately be for the Examining Authority to decide whether the proposed changes are material.
Public comments, Isleham Parish Council	Consultation arrangements	Many residents are elderly and have no way of being informed unless receiving written information.	The Applicant notes this and this is why the Applicant publicised details of the changes consultation in two consecutive editions of the Newmarket Journal and Ely Standard and wrote to all addresses within 0.5 miles of the proposed changes to the substation arrangements. A Freephone telephone number was available throughout the consultation period and the Applicant made copies of the consultation materials available on request and through the deposit points.

Public comments	Consultation arrangements	Until further information is provided, I do not consider myself to have been consulted.	The Applicant carried out a non-statutory consultation on its proposed changes prior to submitting its application to make changes to the Examining Authority. Should this document be accepted into the Examination, anyone who has registered as an interested party will be able to review and comment on the proposed changes and the Applicant's appraisal of their environmental effects. It will ultimately be for the Examining Authority to decide whether the proposed changes are material.
Public comments	Consultation arrangements	I have requested further information on a number of occasions without a response.	The Applicant does not recognise this account and has endeavoured to respond to the enquiries that it has received.
Public comments, Worlington Parish Council	Consultation arrangements	The consultation period has been too short.	The consultation period of 30 days was in excess of the minimum 28-day period recommended by the Examining Authority [PD-008] .
Public comments	Consultation arrangements	The four-week consultation boiled down to two days.	The Applicant does not agree with this assessment. The consultation events were not the only way of accessing information during the consultation. The Applicant made the consultation document available on request to anyone who was not able to attend the exhibitions and continued to take questions by email and using the Freephone telephone number.
Isleham Parish Council	Consultation arrangements	All interested parties should have received a consultation booklet.	The Applicant disagrees as the scope of this non-statutory consultation was limited. The Applicant did seek to promote the consultation to those who have registered as interested parties by submitting its consultation notice [AS-0234] (which included details of how to access the consultation document) for acceptance into the Examination. When this notice was published, anyone who has signed up for updates through the National Infrastructure Planning website would have received an email update. The Applicant also wrote to all persons and bodies notified of the acceptance of the application under Section 56 of the Planning Act 2008
Hen	Consultation arrangements	Not every household received a consultation booklet.	The Applicant believes that it has consulted appropriately given the scope of the non-statutory consultation. This involved writing to all residents living within a half mile radius of the

			<p>substations affected by Options 1, 2 and 3. This numbered 344 addresses. The Applicant also wrote to all persons and bodies notified of the acceptance of the application under Section 56 of the Planning Act 2008 and submitted its consultation notice [AS-0234] and notice of exhibitions [AS-0235] for acceptance into the Examination so that interested parties were made aware of the consultation.</p> <p>When publicising the exhibitions, the Applicant wanted to ensure that anyone else with an interest in the application was aware of the consultation. The letter stated that the consultation document was available to view online through the Sunnica website and in hard copy on request. The Applicant considers that the promotion of the consultation to a wider area demonstrates its commitment to publicising the consultation widely.</p>
Public comments	Consultation arrangements	The consultation is too short and doesn't compare to the 2019 non-statutory consultation.	The consultation period of 30 days was in excess of the minimum 28-day period recommended by the Examining Authority [PD-008] . The difference in consultation activity is reflective of the difference in scope of the two consultations. The non-statutory changes consultation was on the Applicant's proposed changes only, whereas the 2019 pre-application non-statutory consultation related to the entire proposed Scheme.
Public comments, Worlington Parish Council	Consultation arrangements	The consultation has been inadequate.	The Applicant respectfully disagrees with this assessment and considers that it has consulted appropriately. Further information on the Applicant's consultation activity can be found in Chapter 2 of this document.
Public comments	Consultation arrangements	The recommendations of the planning Inspectorate to Sunnica Ltd was to hold a "Public Meeting" not an event.	The Applicant considers that it has responded to this request appropriately by organising two public exhibitions during the consultation. Public exhibitions enable anyone with an interest in the proposals to attend and speak to members of the project team directly about the issues that are most important to them in particular. A public meeting format would not have enabled all attendees to have this level of contact with the project team and would have been held over a shorter, less flexible time period.

Public comments, Worlington Parish Council	Consultation arrangements	All 11,000 homes should have been informed of any changes to the DCO by receiving a booklet.	The Applicant disagrees as the non-statutory changes consultation was very much different in scope to the two rounds of pre-application consultation carried out by the Applicant. The Applicant recognises the high level of interest in the Scheme locally and therefore promoted its consultation events and the availability of the consultation document (both in hard copy and through the Applicant's website) to the same area that received consultation documents during the statutory consultation held in late 2020, this area includes over 11,000 addresses.
Public comments, Isleham Parish Council	Consultation arrangements	An event should be held at every village location within the scheme boundary as in 2019.	The Applicant disagrees with this assessment and considers its consultation activity to be appropriate given the difference in scope between the non-statutory changes consultation and the 2019 pre-application non-statutory consultation. The non-statutory changes consultation was on the Applicant's proposed changes only, whereas the 2019 pre-application non-statutory consultation related to the entire proposed Scheme.
Public comments	Consultation arrangements	Why is your postal address not on the exhibition invitation letter.	The Applicant's postal address was noted on the consultation notice, the consultation document, at the public exhibitions and on the Applicant's website. The exhibition invitation letter included a Freephone contact number for anyone who wished to contact the Applicant but who did not have internet access.
Public comments	Consultation arrangements	Change 1 is subject to NGET "substantiating its claim in its relevant representation which stated that Option 1 is 'not technically feasible' ". It is not set out what further changes might be required to the DCO if NGET cannot substantiate this. It might be assumed that compulsory purchase might be required if NGET as landowner is unwilling to proceed. This adds uncertainty to the process. The Applicant will need to demonstrate that risk has been appropriately assessed, that Option 3 is a viable alternative, and	NGET has provided evidence to Sunnica in the form of a letter dated 11 th July (Appendix S). Relevant details from this letter are set out below. As a result Option 1 will be removed and Option 3 continues to be brought forward. The Applicant is working with NGET in relation to the land requirements for the Scheme. NGET state that the land required for option 1 is not available for the following reasons: "that the land requested by Sunnica for their substation to be provided pursuant to the DCO was larger than originally discussed between NGET and Sunnica; and

		whether the public consultation process has been adequately undertaken in light of these comments.	<p>In addition, NGET must meet requirements to provide other connections at the Burwell Main Substation site. To facilitate this, as Sunnica is aware, NGET is undertaking an extension of the substation. the land required for this will mean that the Option 1 connection is not possible.</p> <p>The correct reference for option 1 is Land Plots 20-16, 20-17, 20-18, 20-19, 20-20 as shown on the Land and Crown Plans [rev1] [AS003]. This does not affect Sunnica's connection agreement with NGET at the Burwell 400kV substation and bays remain allocated for the connection."</p>
Public comments	Consultation arrangements	We would like to request that the booklet is sent to all Worlington residents.	The Applicant is happy to provide hard copies of the document to anyone on request but does not consider it appropriate to reopen the consultation and considers the consultation document distribution area as set out in chapter 2 of this document to have been appropriate.

Development Consent Order (DCO) application

Applicant's responses to comments received relating to its DCO application

Parties	Issue	Summary of issue raised	Applicant's response
Public comments	Grid connection options	The DCO application should never have been submitted to The Planning Inspectorate in November 2021 unless a signed contract was available with National grid.	Sunnica has a signed Bilateral Connection Agreement with National Grid. National Grid has confirmed in their letter on 11 th July to Sunnica that their representation regarding option 1 'does not affect Sunnica's connection agreement with NGET at the Burwell 400kV substation and bays remain allocated for the connection.'
Public comments	Grid connection options	In the original consultation booklet 22nd September – 02nd December 2020 Sunnica declared there were 3 options available within the Burwell National Grid Substation (see page 16) when did option 3 get withdrawn from the DCO and why?	The Burwell National Grid Substation extension 'Option 3' referred to in the statutory consultation document was not taken forward within the Applicant's Development Consent Order application. Therefore, this option (as described during the pre-application statutory consultation) does not form part of the Scheme proposals being examined.

Public comments	Grid connection options	The proposed changes save a lot of work at Burwell substation.	Sunnica agrees with this statement if the Option 3 is to progress then there is no need for Option 1 or Option 2 National Grid Substation Extension at Burwell.
Public comments	Grid connection options	Option 3 would be my preferred option.	Sunnica acknowledges this response and thanks the respondent.
Public comments	Changes to application documents	There are significant changes in this consultation document to question whether or not the Original DCO can now be classified as valid to the "Scheme".	The Applicant respectfully disagrees, and Chapter 2 of the Changes Report explains why it is considered that the changes are non-material. In particular it is noted that minimal minor changes will be required to the draft DCO to facilitate the proposed changes. Fundamentally the Scheme continues to be a solar project, with on site BESS and substations; with a cable connection to Burwell Substation. The proposed changes simply tweak some elements of the details of the Scheme.
Public comments	Changes application	The changes represent a material change to the DCO.	The Applicant respectfully disagrees, and Chapter 2 of the Changes Report explains why it is considered that the changes are non-material.
Public comments	Changes application	What is the difference between a minor material and a material change?	The changes process considers whether should be considered as 'non-material' or 'material'. The factors which are taken into account in determining if a change is 'material' are set out in Chapter 2 of the Changes Report. If the factors do not apply to the changes, then the changes will be considered non-material. This is the conclusion of the Changes Report in respect of the changes proposed by the Applicant.
Public comments	Changes application	Expect more information on the impacts of the changes within the changes application.	Noted. Further information on the changes are provided within chapters 3 to 5 of this Report. The assessment has demonstrated that there will be no new or different significant effects as a result of the proposed changes.
Public comment	Changes application	The changes are likely to have a significant effect on many Isleham residents including on visual impact, traffic, large vehicle deliveries, noise etc	Environmental information in relation the changes are provided within chapters 3 to 5 of this Report. This work has demonstrated that there will be no materially new or materially different significant effects as a result of the proposed changes.
Public comments	Application documents	There are not yet any assessments of the impacts	Noted. Further environmental information in relation to the changes are provided within chapters 3 to 5 of

		caused by the proposed changes.	this Report. This work has demonstrated that there will be no new or different significant effects as a result of the proposed changes.
Public comments	Changes to application documents	A lot of emphasis is placed on the statement that the footprints and heights will not exceed those on the original plan. Are these factors the only considerations in an environmental impact assessment?	As outlined in Section 3.3 of the updated Chapter 3: Scheme Description (see Appendix E of this Report), Solar PV and BESS are rapidly evolving and as a result, the draft DCO [APP-019] and supporting Works Plans [AS-004] propose a degree of flexibility to allow the latest technology to be utilised at the time of construction. Given the flexibility applied for and in order to ensure a robust assessment of the likely significant environmental effects of the Scheme, the Environmental Impact Assessment (EIA) has been undertaken adopting the principles of the 'Rochdale Envelope' where appropriate, as described in the Planning Inspectorate Advice Note 9. This involves assessing the maximum (and where relevant, minimum) parameters for the Scheme where flexibility needs to be retained. This is a standard approach to undertaking an EIA.
Public comments	Changes application	The changes application should cover the increased risk (if any) of converting the energy from 132kV to 400kV using a 400kV/33kV transformer and the introduction of a shunt reactor within Sunnica East Site B. The project detail should itemise any additional risks and risk mitigation and reference examples of current battery sites where such conversions and use of such equipment successfully happens.	In principle there is little difference between the risk associated with 132kV and 400kV equipment. Both are rated as high voltage equipment and as such access is only permitted to authorised personnel. The risks associated with a shunt reactor is no different to the risks associated with a transformer. Both devices use the same technology and manufacturing techniques, so introduction of a shunt reactor does not increase the risk associated with high voltage equipment at Sunnica East Substation. Direct transformation between 400kV and 33kV has been used in conventional power stations for many years at higher power ratings than proposed for the Sunnica development.
Public comments	Changes application	What are the changes in detail, are cables going to be laid deeper, or if at the same depth, will the cables create a greater risk should they be	The same parameters for the trench and cabling specifications within the bounds of the 'Rochdale Envelope' as originally submitted would be utilised. The cables would be laid to a depth of

		<p>disturbed. There is mention of a reduced number of cables (one set of three), what are the contingencies, repair time and resultant effects at the connections each end should these be disturbed. I would expect to see Sunnica provide risk assessments and risk mitigation, with examples where such cables carrying the same kV are run safely at similar depths and have been signed off as safe by the correct authorities.</p>	<p>1m to the warning tile and 1.2m to the top of the duct. There is no difference in risk in terms of safety with the 400kV cables than with the 132kV cables and all appropriate industry safety regulations will be followed.</p> <p>As originally submitted, the 132kV cable with two circuits would have given redundancy in the system should there have been a problem with one circuit as 50% of the power to the generating station would remain. Following National Grid's position on Option 1, Sunnica has reviewed the technical options available and is now proposing one 400kV circuit (NGET is supportive of the addition of this "Option 3" connection in principle. As there is only one circuit, Sunnica will be accepting the risk of no redundancy but considers that should there be an issue with the one circuit that it could be fixed relatively quickly. Sunnica is content with this risk as it would mean that once NGET has provided its formal written approval of Option 3 Sunnica will be able to remove Option 2 from the Application.</p> <p>A 400kV cable is safe to cross large distances and there is industry safety guidance which will be followed by Sunnica. Ahead of construction appropriate safety protocols will be following which will include appropriate risk assessment and mitigation.</p>
<p>Matt Hancock MP, Lucy Frazer MP</p>	<p>Changes application</p>	<p>The revised cables would be slightly larger, but details concerning size, heat output and installation are missing from the consultation document.</p>	<p>The revised 400kV cables would be slightly larger than the 132kV cables and will be installed in one trench, within the trench and jointing bay specifications provided for in the DCO application documents as originally submitted. As a result, this change falls within the scope of the Rochdale Envelope. Providing the heat output would not normally be provided at the planning stage, however as the 400kV cables run at a lower current the overall heating effect will be lower than for the more highly loaded 132kV cables. Indicative installation drawings for the 400kV cables will also fit within the</p>

			same parameters of the DCO application submission drawings.
Public comments	Changes application	Details of the proposed changes should not be subject to the Rochdale Envelope as such elements of the project require definition.	As outlined in Section 3.3 of the updated Chapter 3: Scheme Description (see Appendix E of this Report), Solar PV and BESS are rapidly evolving and as a result, the draft DCO [APP-019] and supporting Works Plans [AS-004] propose a degree of flexibility to allow the latest technology to be utilised at the time of construction. Given the flexibility applied for and in order to ensure a robust assessment of the likely significant environmental effects of the Scheme, the Environmental Impact Assessment (EIA) has been undertaken adopting the principles of the 'Rochdale Envelope' where appropriate, as described in the Planning Inspectorate Advice Note 9. This involves assessing the maximum (and where relevant, minimum) parameters for the Scheme where flexibility needs to be retained. This is a standard approach to undertaking an EIA.
Public comments	Changes application	I am not sure what you mean by a "Modification application/ agreement with NGET"? I thought you had a grid connection agreement with National Grid already? Please explain the modification to this?	Sunnica has secured a Bilateral Connection Agreement (BCA) which allows it to connect to the electricity grid and import and export 500MW of electricity. In order to make changes to this BCA, NGET needs to approve the changes – the process of doing so is known as a 'modification application' or simply an 'agreement'. NGET is supportive of the addition of the Option 3 connection in principle (pending formal written approval of the technical feasibility of Option 3 by NGET) and has invited the Applicant to enter into discussions with the relevant NGET engineers in order to facilitate written confirmation of technical feasibility in relation to Option 3. Sunnica has entered into further discussions with the NGET engineers and submitted detailed documents for approval on 11 th July 2022. NGET has confirmed that this potential change does not affect the Applicant's connection agreement with NGET at the Burwell 400kV substation and bays remain allocated for the connection.

<p>Public comments</p>	<p>Changes application</p>	<p>I am not clear why you are retaining Option 2, If the required compulsory purchase is not likely to be obtained. Why are you only removing Option 1 from the DCO but not Option 2? Where does this leave you if Option 3 is not feasible?</p>	<p>The compulsory acquisition process requires that Sunnica explores all reasonable alternative solutions. Whilst NGET is supportive of the addition of the Option 3 connection in principle, this is still pending formal written approval by them. As such, Option 3 will be introduced with Option 2 remaining and then, once the formal written approval has been provided by NGET, Option 2 will be removed.</p>
<p>Public comments</p>	<p>Changes application</p>	<p>What is your plan if Option 3 isn't viable? What about the other Option 3 that was mentioned in your previous consultation? Could that still be used?</p>	<p>Sunnica is confident that Option 3 is viable and NGET is supportive of the addition of the Option 3 connection in principle.</p> <p>In the unlikely event that NGET does not provide its formal written approval, then the Applicant will have demonstrated that it has explored all reasonable alternatives and will be pursuing Option 2 as its sole option.</p> <p>The Burwell National Grid Substation extension 'Option 3' referred to in the statutory consultation document was not taken forward within the Applicant's Development Consent Order application. Therefore, this option (as described during the pre-application statutory consultation) does not form part of the Scheme proposals being examined.</p>
<p>Public comments</p>	<p>Changes application</p>	<p>Why has Option 1 been deemed to be not technically feasible?</p>	<p>NGET state that the land required for option 1 is not available and therefore option 1 is not technically feasible for the following reasons: "that the land requested by Sunnica for their substation to be provided pursuant to the DCO was larger than originally discussed between NGET and Sunnica; and In addition, NGET must meet requirements to provide other connections at the Burwell Main Substation site. To facilitate this, as Sunnica is aware, NGET is undertaking an extension of the substation. the land required for this will mean that the Option 1 connection is not possible. The correct reference for option 1 is Land Plots 20-16, 20-17, 20-18, 20-19, 20-20 as shown on the</p>

			Land and Crown Plans [rev1] [AS003] . This does not affect Sunnica’s connection agreement with NGET at the Burwell 400kV substation and bays remain allocated for the connection.”
Public comments	Changes application	Change 2 cannot be said to be non-material given the change in the proposed technology.	The Applicant respectfully disagrees, and Chapter 2 of the Changes Report explains why it is considered that the changes (including Change 2) are non-material.
Public comments	Changes application	Change 3 is not non-material.	The Applicant respectfully disagrees, and Chapter 2 of the Changes Report explains why it is considered that the changes (including Change 3) are non-material.
Public comments	Changes application	Proposing two different grid connection options and using the Rochdale Envelope at this stage show that the proposals are not yet ready to be examined.	As outlined in Section 3.3 of the updated Chapter 3: Scheme Description (see Appendix E of this Report), Solar PV and BESS are rapidly evolving and as a result, the draft DCO [APP-019] and supporting Works Plans [AS-004] propose a degree of flexibility to allow the latest technology to be utilised at the time of construction. Given the flexibility applied for and in order to ensure a robust assessment of the likely significant environmental effects of the Scheme, the Environmental Impact Assessment (EIA) has been undertaken adopting the principles of the ‘Rochdale Envelope’ where appropriate, as described in the Planning Inspectorate Advice Note 9. This involves assessing the maximum (and where relevant, minimum) parameters for the Scheme where flexibility needs to be retained. This is a standard approach to undertaking an EIA.
Public comments	Changes application	The changes application should not be accepted by the Planning Inspectorate.	The Applicant respectfully disagrees with this comment.
Public comments	Changes application	It is my view that neither the extra transformers, nor the heavier underground cabling will have a material effect on stakeholders.	Noted. The Applicant agrees with this statement.
Public comments	Changes application	The changes application is being carried out on assumption and not on material fact.	The Applicant respectfully disagrees with the comment. NGET is supportive of the addition of the Option 3 connection in principle (pending formal written approval of the technical

			<p>feasibility of Option 3 by NGET) and has invited the Applicant to enter into discussions with the relevant NGET engineers in order to facilitate written confirmation of technical feasibility in relation to Option 3. Sunnica has entered into further discussions with the NGET engineers and submitted detailed documents for approval on 11th July 2022. NGET has confirmed that this potential change does not affect the Applicant's connection agreement with NGET at the Burwell 400kV substation and bays remain allocated for the connection.</p> <p>The Applicant consulted when it did to ensure that the change application was considered as early as possible within the Examination process (given this only came to light post submission of the application) so that the Examination could proceed on the basis of the proposal as it now needs to be, rather than an option that can't be brought forward. The anticipated response time for NGET to confirm technical feasibility meant that this would not be possible without the changes application submission being received prior to that response being received.</p>
Suffolk Wildlife Trust	Changes application	If a modified application is submitted, we would expect all documents to be updated accordingly, including the EclA, landscape plans, CEMP and LEMP.	As shown in chapters 3 to 5 of this report, there are no new or different significant effects as a result of the proposed changes. Therefore, the mitigation outlined within the current EclA and the management plans remain valid as no new or additional mitigation is required.
Reach Parish Council	Changes application	We judge that there is insufficient information in the public domain on which to assess the impacts of the proposed changes, particularly in terms of visual intrusion and noise especially in the locality of Weirs Drove where, in our view, the information associated with the proposed changes brings confusion rather than clarity.	The Applicant respectfully disagrees with this statement. It is considered that the information provided was sufficient to provide an overview of the proposed changes for the non-statutory consultation. In addition, public exhibition events were held where the public were invited to discuss the proposed changes with the Applicants team. However, chapters 3 to 5 of this Report provide further information on the environmental effects of the changes in particular noting that the Changes application will involve

			removing infrastructure in the immediate vicinity of Weirs Drove.
Public comments	DCO application	The present Application should be withdrawn until such time a legally binding agreement is available with the parties concerned.	Sunnica holds a contracted position with National Grid for a Bilateral Connection and NGET has confirmed in writing on 11 th July 2022 (Appendix S) that “This does not affect Sunnica’s connection agreement with NGET at the Burwell 400kV substation and bays remain allocated for the connection.”

Construction

Applicant’s responses to comments received relating to construction

Parties	Issue	Summary of issue raised	Applicant’s response
Public comments	Deliveries	To facilitate extra wide load deliveries to the on-site substations there will be a requirement for significant removal of roadside vegetation. This would create an environmental impact across the proposed routes that would constitute a material change to the DCO.	<p>The proposed changes will not impact on the proposed haulage routes; however, larger AIL vehicles will be required to transport the 400kV transformer to Sunnica West Site A, Sunnica East Site A and Sunnica East Site B only, should Option 3 be taken forward.</p> <p>Therefore, a tracking exercise (swept path analysis) for AILs has been undertaken on the identified routes which has demonstrated that manoeuvres, including over/under-sail, can be accommodated within the highways boundary in all but one location – the Mildenhall Road/Ferry Lane T-junction. A minor update to the Order limits has been made at this location to accommodate the over-sail of the trailer at this junction.</p> <p>The AIL’s would require very minimal vegetation clearance. The locations where vegetation may require clearance assessed by an ecologist and assessed as not leading to significant adverse environmental effects.</p>
Public comments	Construction methods	How exactly will the construction methodology required differ (as stated) from the DCO application? What differing impacts will it have on community,	The construction methods are not anticipated to changes; however, the timing of the works will be extended for the cable installation and the onsite substation works, which will increase from 30 to 50 weeks. Although this is an

		landscape, highway movement, noise, timescales?	increase for these works it is still within the total 24-month construction programme. The environmental assessments for the proposed changes are provided in chapters 3 to 5 of this Report.
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Operations

Applicant's responses to comments received relating to operations

Parties	Issue	Summary of issue raised	Applicant's response
Public comments	Operations	When you speak of power import and export do you mean buying and selling electricity for profit? How will the proposed changes affect this?	Sunnica holds a contracted position with National Grid for a Bilateral Connection and NGET has confirmed in writing on 11 th July 2022 (Appendix S) that "This does not affect Sunnica's connection agreement with NGET at the Burwell 400kV substation and bays remain allocated for the connection." In terms of the amount of energy that is imported or exported to and from the grid, nothing will change as a result of including Option 3.

Ecology

Applicant's responses to comments received relating to ecology

Parties	Issue	Summary of issue raised	Applicant's response
Suffolk Wildlife Trust	Habitats	We would like to seek assurance in relation to Change 2 as to whether there could be an effect on hydrology from installing a 400kV cable, with potential implications for Chippenham Fen SSSI, County Wildlife Sites, peat soils and directional drilling under watercourses. For instance, would a single trench for 400kV need to be larger, deeper and require more jointing bays?	As shown in Chapter 4 of this Report, the maximum parameters, e.g., depth, width, installation technique or duration, for the Cable Route, should Change 2 be taken forward would not change as a result of the proposed change to a 400kV cable. Therefore, no changes in the magnitude of the effects assessed for potential degradation and disturbance to Chippenham Fen SSSI, County Wildlife Sites, peat soils and water courses would arise and so the conclusions of the Environmental Statement [APP-032 to APP-128] would remain the same.

Suffolk Wildlife Trust	Construction	<p>We would like to seek assurance in relation to Change 3 as to whether the risk of disturbance to birds might increase if the changes would result in:</p> <ul style="list-style-type: none"> additional staff needed during construction additional vehicle movements or other sources of noise disturbance during construction changes to timing or duration of works changes to the maintenance regime 	<p>The proposed changes will not result in the need for additional staff or vehicle movements.</p> <p>In terms of noise, changes in noise as a result of Option 3 would result in an increase in noise from combined solar infrastructure plant and the substation and battery storage areas of no greater than 2 dB. This is not anticipated to alter the magnitude of impact / significance effect of the Scheme on biodiversity.</p> <p>The anticipated programme of the cable installation and the onsite substation works will increase from 30 to 50 weeks, which although an increase is still within the total 24-month construction programme. All restrictions related to the timing of works to avoid ecology impacts during construction will be retained and incorporated into the phasing plan developed by the principal contractor.</p>
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Landscape and Visual Amenity

Applicant’s responses to comments received relating to landscape and visual amenity

Parties	Issue	Summary of issue raised	Applicant’s response
Public comments	Visual impact	Option 3 has no material impact on the existing approved scheme and avoids further unsightly electrical equipment in Burwell.	Option 3 if taken forward would remove the requirement for a substation to be located in the vicinity of the existing National Grid Burwell Substation.
Public comments	Visual impact	Would the revised substation arrangements have the same skyline, be more intrusive, or be bulkier?	The massing is larger with the 400kV transformer as is demonstrated in the figures provided within this report. However, as the proposed substation changes would be within the maximum parameters specified in the Applicant’s DCO application, a worst case assessment has been undertaken within the Environmental Statement and no new or different significant effects are anticipated. In addition, the Applicant considers the photomontages [APP-215 to APP-232] to still

			represent the visual impact of the proposed Scheme including the substation arrangements.
Public comments	Visual impact	The revised substation arrangements may require different insulation techniques or the use of glass or porcelain insulator strings which have a different visual impact.	It is feasible to utilise different insulators and these would be selected to not only provide the necessary technical properties but also mitigate visual impact from the Scheme. Whilst the appearance of the materials may be different, it would not be so significant to have any implications on the landscape and visual impact assessment. Details including materials will be agreed at the detailed design stage of the DCO process pursuant to Requirement 6.
Public comments	Assessment	An assessment of the visual impacts of the changes has yet to be carried out by Sunnica and therefore it is difficult to visualise the changes.	As the proposed substation changes would be within the maximum specified in the Applicant's DCO application as submitted, the Applicant considers the photomontages [APP-215 to APP-232] to still represent the visual impact of the proposed Scheme including the substation arrangements. The consideration of the visual impacts of the changes are provided in Chapters 3 to 5 of this Report. The assessment has concluded that there will be no new or different significant effects as a result of the proposed changes.
Public comments	Assessment	The location of the shunt reactor needs to be given to properly assess its impact within the landscape.	The Shunt reactor is within the maximum parameters assessed within the Environmental Statement [APP-032 to APP-128]. Landscape and visual consideration of the Shunt reactor is provided in Chapter 5 of this Report. This has concluded that there will be no new or different significant effects as a result of the proposed changes.

Transport and Access

Applicant's responses to comments received relating to transport and access

Parties	Issue	Summary of issue raised	Applicant's response
Public comments	Transport impact	What impact will the changes have on highways?	<p>The proposed changes will not impact on the proposed haulage routes; however, larger AIL vehicles will be required to transport the 400kV transformer to Sunnica West Site A, Sunnica East Site A and Sunnica East Site A, and shunt reactor at Sunnica East Site B only, should Option 3 be taken forward.</p> <p>Therefore, a tracking exercise (swept path analysis) for AILs has been undertaken on the identified routes which has demonstrated that manoeuvres, including over/under-sail, can be accommodated within the highways boundary in all but one location – the Mildenhall Road/Ferry Lane T-junction. A minor update to the Order Limits has been made at this location to accommodate the over-sail of the trailer at the junction.</p>
Snailwell Parish Council	Transport impact	The equipment in these drawings (on-site substations) seem to effectively increasing the size and doubling up on your largest components which will surely have an impact on our rural roads.	The transformers and shunt reactor will be transported to site using AILs. All other equipment will be transported on standard size HGVs. The transport assessment for Option 3 is presented in Chapter 5 of this Report.
Public comments	Transport	How do you plan on getting the shunt reactor to the sites at East A, B and West A?	The shunt reactor is only required at the Sunnica East Site B onsite substation. It will be transported to site using an AIL.

Human Health

Applicant's responses to comments received relating to human health

Parties	Issue	Summary of issue raised	Applicant's response
Public comments	Safety	The shunt reactor is a concern, not only will this affect the visuals, it will also elevate the risk of fire and ultimately has serious health and safety concerns.	The risk associated with a 400kV shunt reactor is no different to that associated with a 400kV transformer. It uses the same technology and manufacturing techniques. In addition, the

			installation and oil and fire containment facilities are the same as for a transformer.
Public comments	Safety	Sunnica are not able to discuss any possible effect on the fire risk at the Sunnica battery sites caused by the introduction of the further array of transformer equipment near those batteries.	It is not anticipated that Option 3 will increase the fire risk of the batteries. Adequate control measures and separation distances have been set out within the Outline Fire Safety Battery Management Plan [APP-124] and would equally apply to the new arrangements.
Public comments	Electromagnetic radiation	Where are the electromagnetic field calculations and impacts known to be associated with 400kv (rather than 132kv) cabling explained and safety evidenced? For example, demonstrating impact of health and exposure corridors relating to this scheme and the re-rated cabling of the new proposal?	In both the 132kV and 400kV installations the 3-phase cables are laid in trefoil formation. In this formation the width of electric field is substantially reduced and there will be little difference in the resultant magnetic field between a 132kV installation and a 400kV installation. The maximum EMF is calculated as approximately 46.0 μ T for the 132kV and 27 μ T for the 400 kV cable. ICNIRP 1998 (International Commission on Non-Ionizing Radiation Protection) quote Occupational exposure as 500 μ T(1) (Field actually required: 1800 μ T) and Public exposure as 100 μ T (Field actually required 360 μ T).
Public comments	Electromagnetic radiation	Sunnica does not appear to have considered the increase in the voltage through the cable and any implications that could have for possible magnetic field leakage. The cable is proposed to run at only a one-meter depth under public footpaths and crop growing fields.	The magnetic field is a function of the current flowing in the cables. The current flowing in the 400kV cables will be less than in the 132kV cables by about 30% (per cable) and therefore the magnetic field will be lower by approximately 30%.
Public comments	Assessment	At this stage it is surprising that a risk assessment is missing from the proposals.	The Applicant is following industry guidelines for the installation of cables and equipment in the design. Prior to construction all appropriate construction and operational risk will be assessed further.

Noise and Vibration

Applicant's responses to comments received relating to noise and vibration

Parties	Issue	Summary of issue raised	Applicant's response
Public comments	Noise	What are the operating noise differences at each of Sunnica West A and B and East A and B with the different equipment now proposed over Option One?	Further information on the environmental assessment can be found in Chapter 5 of this Report. Changes in noise as a result of Option 3 would result in an increase in noise from combined solar infrastructure plant at receptors nearest the substation and battery storage areas (R5, R6, R8, R9, R10, R11) of no greater than 2 dB. This difference in noise is not perceptible to the average human ear and would result in absolute noise levels that are no worse than a Low impact. Consequently, the new infrastructure associated with Option 3 would not result in additional significant noise effects.
Public comments	Noise	How noisy is a shunt reactor?	<p>Typically noise levels from Shunt reactors are less than 82 dBA, this depends on design and testing and determined according to IEC 60076-10). However, the Max sound power level should not exceed the following (tested/determined under conditions as stipulated in IEC 60076-10) levels which are the conditions for National Grid sites and have been used as the basis for the reporting set out in the Changes Report:</p> <ul style="list-style-type: none"> - 91 dB(A) Maximum for Main Unit/Tank. - 87 dB(A) Maximum for Cooler Bank. <p>The transformers and the shunt reactor would be subject to detailed design to determine the plant manufacturer and the final layout of the area. The Operational Environmental Management Plan (OEMP), based on the Framework OEMP [APP-126], that is brought forward for approval in detailed design will set out how the Scheme design and operational plant levels have been developed</p>

			to mitigate and reduce effects to a minimum.
Public comments	Noise	The proposed substation arrangement changes may lead to noise pollution from wind tones in certain conditions.	Noise predictions are undertaken using ISO9613-2, which assumes downwind conditions with windspeeds up to 5 m/s. So unfavourable wind conditions are inherent in noise predictions. The new layout will not result in any material changes in noise impacts.

Compulsory acquisition

Applicant's responses to comments received relating to compulsory acquisition

Parties	Issue	Summary of issue raised	Applicant's response
Public comments	Compulsory acquisition	How much of the scheme requires compulsory purchase? Are there other areas that may need to change if the landowner is unwilling to let you use their land?	Where possible the Applicant is committed to securing voluntary property agreements but has sought compulsory acquisition powers to ensure that the scheme can be delivered if this is not possible. The Applicant does not currently propose to make any other changes to the scheme and in any event would note that the proposed changes do not arise from the land powers sought.
Public comments	Compulsory acquisition	Are there other parts of the scheme that will require compulsory purchase or have these all been removed? If compulsory purchase is required elsewhere, what happens if you don't get this either?	Where possible the Applicant is committed to securing voluntary property agreements but has sought compulsory acquisition powers to ensure that the scheme can be delivered if this is not possible. The Applicant does not currently propose to make any other changes to the scheme and in any event would note that the proposed changes arise from the technical feasibility of the design being questioned by NGET, not the land powers sought.

Other

Applicant's responses to miscellaneous matters received from the consultation comments

Parties	Issue	Summary of issue raised	Applicant's response
Public comments	General comment	Support the changes proposed.	The Applicant notes this comment.
Public comments	General impact	The substations required at Sunnica West Site A, Sunnica East Site A and Sunnica East Site B are changing from 132kV/33kV to the introduction of a 400 kV/33kV transformer at each site which will have a profound effect on the local community.	The environmental consideration of the changes in chapters 3 to 5 of this Report have concluded that there will be no materially new or materially different significant effects as a result of the proposed changes.
Public comments	Engagement with NGET	Sunnica has not invested enough time and effort in understanding the complexities of connecting their "Scheme" into the Burwell National Grid Substation.	Sunnica has been negotiating with National Grid since 2018 to secure the grid connection at Burwell. This includes many rounds of meeting and negotiations over the length of that time with increasing intensity towards the submission of the DCO. The Applicant was taken by surprise by the representation from NGET.
Public comments	Engagement with NGET	No application should have been made until a suitable agreement with NGET was in place.	<p>Sunnica holds a contracted position with National Grid for a Bilateral Connection and NGET has confirmed in writing on 11th July 2022 (Appendix S) that "This does not affect Sunnica's connection agreement with NGET at the Burwell 400kV substation and bays remain allocated for the connection."</p> <p>Sunnica is working with NGET to secure approval from NGET such that their engineers confirm that the changes are technically feasible. Sunnica has entered into further discussions with the NGET engineers and submitted detailed documents for approval on 11th July 2022. Once technical approval happens, the Applicant would seek to remove Option 2 from the Application. The changes to the Application sought by the Applicant therefore retain flexibility to deliver either Option 2 or Option 3. This flexibility has enabled Sunnica to continue to progress the consultation ahead of receiving formal written</p>

			<p>approval from NGET regarding Option 3.</p> <p>The Applicant consulted when it did to ensure that the change application was considered as early as possible within the Examination process (given this only came to light post submission of the application) so that the Examination could proceed on the basis of the proposal as it now needs to be, rather than an option that can't be brought forward. The anticipated response time for NGET to confirm technical feasibility meant that this would not be possible without the changes application submission being received prior to that response being received.</p>
Public comments	Engagement with NGET	NGET should have provided better advice prior to the submission of a DCO application.	The DCO application would have benefited from having the information provided in the NGET representation prior to submission of the DCO application.
Public comments	Questions	What are solar stations?	A solar station comprises an inverter, a transformer and the switchgear. These would either be standalone equipment ('outdoor') or they would be housed together within a container ('indoor'). Further information can be found in the Environmental Statement Chapter 3 [APP-035].
Public comments	Sentiment	The proposed changes have created further concern locally.	It has not been the Applicant's intention to cause concern. The Applicant has provided further information relating to its proposed changes within this changes application which, if accepted by the Examining Authority, will be available for interested parties to view and comment on as part of the Examination.
Network Rail	Assessment	We have reviewed the consultation booklet and understand that of the three proposed changes, only Change 2 might impact on Network Rail's assets. Change 2 enables Sunnica Ltd to use 400kV cabling within grid connection	The Applicant has requested a meeting with the technical engineers at Network Rail and proposes to submit a new Form B to replace the existing Form 01 Acceptance.

		<p>routes A and B. The consultation booklet states that by using 400kV cables, fewer but larger cables will need to be installed. We understand that grid connection route B is currently proposed to run underneath the Anglian railway line. As such Network Rail is reviewing the proposed changes and we will revert with further comments if necessary in due course.</p>	
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1.6 Responses received to additional consultation on change to the Order limits and Abnormal Indivisible Load (AIL) Tracking Report

Suffolk County Council, Cambridgeshire County Council, East Cambridgeshire District Council, West Suffolk Council

Applicant responses to issues raised

Theme	Issue	Summary of issue raised	Applicant’s response
Consultation	Information provided	<p>The consultation does not include any information on changes in traffic volumes resulting construction and operation of the revised substations and cable corridors presented as option 3 together with any re-assessment of the relevant parts of the Environmental Statement. While the environmental impacts of the change may indeed be similar overall it is for the applicant to demonstrate that the changes do not create a greater impact at a specific location. For example, it is not clear if changes will be required to the permanent accesses for the relocated substations.</p>	<p>The number of cranes/AILs required for the Scheme are summarised in Table 5-1 of the Transport Assessment [APP-117], summarise below:</p> <ul style="list-style-type: none"> - 80 tonne crane – 16 vehicles - 400 tonne crane – 8 vehicles - 1000 tonne crane – 4 vehicles - STGO CAT 2 Low Loader (AIL) – 16 vehicles - STGO CAT 3 Low Loader (AIL) – 8 vehicles <p>The number of cranes/AILs is not anticipated to change should the Scheme proceed with the Burwell National Grid Substation – Option 2; however, should Option 3, 33/400kv onsite substation, proceed there would be no requirement for cranes/AILs to travel to Burwell National Grid Substation – Option 2 which would result in a minor reduction in cranes/AILs require to travel to site.</p> <p>There are no changes required to site access as a result of NMC-03.</p>
Consultation	Information provided	<p>The consultation does not include any assessment of highway structures or construction to demonstrate they can carry appropriate heavy loads in the area adjacent to the site and the wider regional route to suitable</p>	<p>The Applicant considers that sufficient detail has been provided for the stage of the Scheme to determine the suitability of the local and regional routes. Site visits and ground truthing has been undertaken of all the access point to determine constraints such as ditches. In addition,</p>

		ports. In 2.1.4 the applicant implies that discussions with the police and LHA will be at a later stage and hence at this time uncertainty remains that AILs can access the site.	the proposed routes avoid bridges on the local network which are unsuitable for AILs/Cranes. The Framework CTMP [APP-118] provides indicative designs for all the access points and detailed design of the accesses will be undertaken post-consent. Additionally, at this stage, it is not certain where the AILs will originate, and therefore, an assessment of the regional routes has not been undertaken at this stage.
Consultation	Information provided	The consultation does not include any information on the future security of AIL routes.	The AIL and Crane routes are included within the Framework CTMP [APP-118] which is secured through the Requirement 14 of the draft DCO [APP-019] .
Consultation	Information provided	The drawing supplied showing the additional area required for oversailing AILs at the junction of the B1102 Mildenhall Road and C603 Feckenham Road lacks sufficient detail as a consultation document. The plan provides very little geographical information making it insufficient as a detailed plan. While a single road name and proximity to a village are indicated at the bottom of Paragraph 6 of the covering letter, this is not considered satisfactory and should be supplemented with (or inset into) an appropriate location plan. Whilst the Councils have access to plans that enable it to identify the location this is likely to be difficult for other stakeholders lacking this data. SCC notes that the highway boundary has not been determined at this location.	<p>The Applicant provided details in the covering letter and text on the website confirming the location of the point where the oversailing has been identified and that the change to the Order limits is required. In addition, a detailed plan showing the locations of all junctions and corresponding Plate number was provided on page 17 of the consultation document.</p> <p>The method of determining the highway extent was based on Her Majesty's Land Registry (HMLR) polygon data. The Applicant has, on three separate occasions, been informed of the private landownership extent to the north of Mildenhall Road at this location. Discussions are presently ongoing regarding the use of this area of private land for the facilitation of the Scheme.</p>
Consultation	Information	Plate 2 is considered to be incorrect in that it does not accurately show the maturity of landscaping and it is presumed that National Highways have been consulted, as some of the land that will be required falls under its control.	The Applicant consulted with National Highways on the proposed change to the Order limits and the AIL Tracking Report. National Highways subsequently responded to confirm that it had no comments to make.
Transport	Assessment	The Councils are concerned Sunnica have not commissioned detailed surveys to confirm the highway boundaries of the relevant junctions and links and thereby confirming that AILs (or other works) do not extend	The Applicant considers that the level of detail is sufficient for the stage of the Scheme. The method of determining the highway extent was based on Her Majesty's Land Registry (HMLR) polygon data. This ensured privately owned land was reviewed and subsequently omitted

		beyond the public highway except where already identified.	from being included within the Order limits.
Transport	Assessment	Sunnica has not commissioned detailed surveys to confirm the highway boundaries in Freckenham at the junction of the B1102 The Street/Mildenhall Road and the U6003 Elms Road where the western boundary of the highway is yet to be determined.	The Applicant considers that the level of detail is sufficient for the stage of the Scheme. The method of determining the highway extent was based on Her Majesty's Land Registry (HMLR) polygon data. This ensured privately owned land was reviewed and subsequently omitted from being included within the Order limits.
Transport	Assessment	In Section 2.1.4 it is indicated that 'The swept analysis has been based upon OS mapping' and that this 'is considered sufficient for this stage of the planning process'. Given the concerns elsewhere within this response, with respect to ensuring vehicle wheel track remains within the metalled carriageway and that verified highway extent be accurately detailed, the Councils would question this, especially given low confidence in the existing base within the more rural locations based on local experience.	The Applicant considers that the level of detail is sufficient for the stage of the Scheme. A ground truthing exercise has been undertaken onsite to measure key road widths and this has demonstrated that the OS mapping provides a realistic representation of the existing situation across the Scheme. However, consultation will continue with the Local Highways Authority regarding their concerns with the use of OS mapping.
Transport	Assessment	There are no tree surveys provided at junctions and bends where the swept path analysis demonstrates there might be damage to trees. There are tree preservation orders on trees at the junction of B1102 Mildenhall Road and The Street, Freckenham TPO/1972/182. The applicant should be aware that trees within the highway verge are not normally protected by tree preservation orders because they are not considered to be under any risk. Accurate information on trees, a survey to the standard in BS837:2012 Trees in relation to design, demolition and construction should be provided.	At this stage no detailed tree surveys have been undertaken, and although it is acknowledged that there are TPO orders at the junction of B1102 Mildenhall Road and The Street, Freckenham, the tree in the central island which may require trimming as a result of the AIL/crane movement is not covered by this Order. As outlined in the Framework CEMP and Precautionary Arboricultural Method Statement in Appendix 10B [APP-101] surveys of all potentially affected trees will be undertaken and methods of work agreed with the LPA prior to works being carried out.
Transport	Assessment	With regard to the bend on B1102 The Street/Mildenhall Road (Plate 6), the blue line (wheel path) clearly shows this run over the circular island at the junction of the B1102 The Street, Mildenhall Road, Freckenham (Plate 6). The applicant states that they have	The Applicant acknowledges the need to protect roots of the tree where the trimming and overrun may occur. The consultation material has referred to the mitigation measures outlined in the Framework CEMP which include protection of tree roots. The requirements for the root protection zone will be clearly

		only considered trimming of vegetation at this location (4.1.1). The area is included within the Order limits but no information has been provided on any works here. The LHA would note that these could damage the roots for the tree within the island.	defined by the appointed site Arboriculturist prior to the construction phase. This is also reflection in the Precautionary Arboricultural Method Statement in Appendix 10B [APP-101] .
Transport	Assessment	With regard to the bend on B1102 The Street/Mildenhall Road (Plate 6), the councils are concerned that not all of the hedgerows/trees identified for works for this junction have been assessed as part of the Preliminary Bat Roost Appraisal Report (figures 2.1-2.9, Appendix 8J - Report on Surveys for Bats, ES [APP-087]). It is therefore not possible to determine the level of impact of these works.	All trees/hedgerows identified as potentially being affected by the works to this junction have been considered and reviewed by an experienced ecologist in line with the guidance in the Bat Surveys: Good Practice Guidelines for Professional Ecologists 3rd Edition, for their suitability to support roosting bats. All trees identified as potentially being subject to works were considered to be of negligible value for roosting bats. Therefore, no impacts to bats are predicted.
Transport	Assessment	With regard to the Unnamed Road and Beck Road Junction (Plate 8), the councils are concerned that not all of the hedgerows/trees identified for works have been assessed as part of the Preliminary Bat Roost Appraisal Report (figures 2.1-2.9, Appendix 8J - Report on Surveys for Bats, ES [APP-087]). It is therefore not possible to determine the level of impact of these works.	All trees/hedgerows identified as potentially being affected by the works to this junction have been considered and reviewed by an experienced ecologist in line with the guidance in the Bat Surveys: Good Practice Guidelines for Professional Ecologists 3rd Edition, for their suitability to support roosting bats. All trees identified as potentially being subject to works were considered to be of negligible value for roosting bats. Therefore, no impacts to bats are predicted.
Transport	Assessment	With regard to the B1103 Swan Lane/Oxford Street Junction, Exning (Plate 11) it is noted that the oversailing load is immediately adjacent to The White Swan Public House. The base map is derived from ordnance survey and the Councils would again draw the applicant's attention to potential errors in such map and in this specific case the presence of gutters, down pipes and roof overhang associated with the building. To SCC's knowledge the highway boundary at this location has not been determined.	The Applicant considers that the level of detail is sufficient for the stage of the Scheme. A ground truthing exercise has been undertaken onsite to measure key road widths and this has demonstrated that the OS mapping provides a realistic representation of the existing situation across the Scheme. However, consultation will continue with the Local Highways Authority regarding their concerns with the use of OS mapping.
Transport	Assessment	Section 6 suggests only one location where over sail of the highway boundary will occur, requiring the DCO boundary to be	Noted. However, these over-sails were previously identified and are within the Order limits. The Applicant considers that the level of detail is sufficient for the

		<p>amended, whereas there appear to be at least two additional locations on Weirs Drove, Burwell where this occurs. 2.1.4 indicates that the swept path information is based upon OS rather than Topographical survey and is noted to not include the verified extent of the public highway (simple extracts from the highway record would not be sufficient in this regard, as it can on occasions erroneously include other features, such as riparian owned ditches). Without appropriate base information, it is not possible to confirm whether the wheel track will remain within the carriageway or that over sail may be contained within the public highway.</p>	<p>stage of the Scheme. A ground truthing exercise has been undertaken onsite to measure key road widths and this has demonstrated that the OS mapping provides a realistic representation of the existing situation across the Scheme. However, consultation will continue with the Local Highways Authority regarding their concerns with the use of OS mapping.</p>
Transport	Assessment	<p>In the absence of accurate survey or verified highway extents it is unclear as to whether the AIL will over sail the existing road. In this context it is unclear what is meant by 'road' in paragraph 2.1.2 and whether this term includes all infrastructure within the public highway limits.</p>	<p>The reference to road in this context refers to the road surface/pavement and not all infrastructure within the public highway limits. The Applicant considers that the level of detail is sufficient for the stage of the Scheme. A ground truthing exercise has been undertaken onsite to measure key road widths and this has demonstrated that the OS mapping provides a realistic representation of the existing situation across the Scheme. However, consultation will continue with the Local Highways Authority regarding their concerns with the use of OS mapping.</p>
Transport	Assessment	<p>While providing Plate 5 is appreciated, it is not clear why the return bend where the driveway to Chippenham Hall joins the B1085 has not been shown. While the developer might consider there not to be an impact, details for all relevant bends should be provided even to justify that there will be no impact.</p>	<p>Noted. This was not provided within the consultation material as no issues were identified with the AIL/crane movement. However, this movement is included in Figure 26 of the Framework CTMP, which accompanies this Change Application as Appendix Q.</p>
Transport	Assessment	<p>With regard to Newmarket Rd (B1103)/Isaacson Road junction, Burwell (Plate 10), this section refers to oversailing verge, whereas a footway is present. As previously discussed, the highway extent must be verified, and appropriate measures implemented within the CTMP to</p>	<p>Based on the swept path analysis undertaken, the wheels of the AIL will remain within the road (pavement surface) but the trailer will oversail the footpath. It is anticipated that the road will be closed, or rolling roadblocks will be used, when the cranes/AILs will be traveling along Newmarket Road (B1103) and Isaacson Road and when navigating the junction. Scheme. Therefore, there</p>

		manage and protect NMU use of this footway.	should all NMU's will be protected. In paragraph 5.4.5 of the Framework CTMP it states: <i>'The requirements for the cranes and AILs along the routes will be discussed and agreed with the relevant local highway authorities, National Highways and police.'</i> All requirements for road closures will be agreed with the relevant local highways authority in advance of the works.
Transport	Assessment	With regard to Newmarket Rd (B1103)/Isaacson Road junction, Burwell (Plate 10), it is indicated that 'existing vegetation may need to be cut back to allow for trailer over sail; it is however unclear whether the hedge located within public highway or on private land. This must be verified before any work is undertaken and any appropriate notices served.	The method of determining the highway extent was based on Her Majesty's Land Registry (HMLR) polygon data. This ensured privately owned land was reviewed and subsequently omitted from being included within the Order limits.
Transport	Assessment	With regard to Newmarket Rd (B1103)/Isaacson Road junction, Burwell (Plate 10), it is unclear whether or not the proposals will include cutting back of tree branches as part of the proposed site access works AS-39 (plate 10). If the tree will be cut, the Councils are concerned that the tree was not assessed as part of the Preliminary Bat Roost Appraisal Report (figures 2.1-2.9, Appendix 8J - Report on Surveys for Bats, ES [APP-087]) and therefore, it's not possible to determine the level of impact of these works.	There may be the requirement for vegetation to be cut back to allow for trailer over-sail on the southern side of the junction. However, the trees/hedgerows at this location were reviewed by an experienced ecologist in line with the guidance in the Bat Surveys: Good Practice Guidelines for Professional Ecologists 3rd Edition, for their suitability to support roosting bats. All trees identified as potentially being subject to works were considered to be of negligible value for roosting bats. Therefore, no impacts to bats are predicted.
Transport	Assessment	With regard to Reach Road(B1103)/Weirs Drove, Burwell (Plate 13), while Plate 13 includes dimensions, the central island shown does not appear to accurately represent the island seen on site; it is therefore unclear whether this site has been accurately surveyed, or whether these are singular dimension. Previous comments regarding the base upon this swept path would remain applicable.	The Applicant respectfully disagrees, from a ground truthing exercise this central island is triangular and separates the entry and egress into Weirs Drove. However, the Applicant notes the concerns raised and consultation will continue with the Local Highways Authority regarding their concerns with the use of OS mapping.
Transport	Assessment	With regard to Reach Road(B1103)/Weirs Drove,	The two trees identified in Plate 13 as potentially requiring works to them to

		Burwell (Plate 13), the proposed works for AS-35 includes the removal of two trees, which the applicant have identified as of low / moderate potential for bats, with not bat roosts identified in the 2021 survey. However, at least one, if not both of these trees were not assessed as part of the Preliminary Bat Roost Appraisal Report (figure 2.9, Appendix 8J - Report on Surveys for Bats, ES [APP-087]). It is therefore not possible to determine the level of impact of these works.	facilitate access were assessed as part of updated surveys in 2021. The trees/hedgerows at this location were reviewed by an experienced ecologist in line with the guidance in the Bat Surveys: Good Practice Guidelines for Professional Ecologists 3rd Edition, for their suitability to support roosting bats. No active bat roosts were identified and therefore, no impacts to bats are predicted.
Transport	Assessment	With regard to the 'S'- Bend on Weirs Drove, Burwell (Plate 12), while described as 'remaining within the highway during its transit of both bends', the transit of the eastern bend shown on plate 13 shows it to overhang the ditch. While no verified highway extent is shown on plan, it appears likely that this ditch is riparian owned.	Noted. Should Burwell National Grid Substation Extension Option 2 be taken forward, there is the potential that the AIL trailer will over-sail the ditch to the north-west of the corner. However, this area is within the Order limits and consultation has previously been undertaken with the IDB related to the ditches surrounding the Burwell Substation.
Transport	Assessment	With regard to the 'S'- Bend on Weirs Drove, Burwell (Plate 12), it is indicated that two trees may require pruning. The trunk of one of these trees is shown fully within the swept path and is likely to be entirely compromised by this proposal.	Noted. There is a potential that one of the trees may require felling. Mitigation measures regarding tree removal and protection are provided in the CEMP and the Precautionary Arboricultural Method Statement in Appendix 10B [APP-101], including the requirement for detailed tree and ecology surveys prior to any works being undertaken.
Transport	Assessment	With regard to Weirs Drove/ Newnham Drove Junction, Burwell (Plate 14), while it is indicated that 'the trailer will over sail the inside grass verge by approximately 8m but the vehicle will remain within the highway', it appears on plate 14 to overhang the ditch on the north-western corner. While no verified highway extent is shown on plan, it appears likely that this ditch is riparian owned.	Noted. Should Burwell National Grid Substation Extension Option 2 be taken forward, there is the potential that the AIL trailer will over-sail the ditch to the north-west of the corner. However, this area is within the Order limits and consultation has previously been undertaken with the IDB related to the ditches surrounding the Burwell Substation.
Transport	Assessment	It is noted the consultation material only covers the route and does not show access into the Burwell National Grid sub-station site, or Sunnica West Site A (presuming these are the only	Noted. The access into the Sites were not included in the consultation material. This is due to the proposed accesses with the Framework CTMP [APP-118] for Burwell National Grid Substation Option 2, Sunnica East Site A, Sunnica East Site B

		<p>site requiring such access). The individual access design, at Appendix 13C considers a swept path for a 1000T crane in points 5.9.10 and 5.9.11.</p> <p>The wheel track may be accommodated in the same footprint as the 1000T crane, but this will need to be shown. The over sail of the hedge line to the south (and possibly to the north as it turns left within the site) of the proposed junction may be significant. Looking at the position of access B on Appendix 13C Fig 10, any over sail would appear to be within the DCO boundary, so likely to be achievable, although requiring further removal of trees upon which others may want to comment. Similarly from Figure 2 of Appendix 13C, Sunnica West Site A access A, the whole frontage onto La Hogue Road is included in the DCO boundary, so should again be achievable.</p>	<p>and Sunnica West Site A being sufficient for the AILs. The swept path analysis for each access is provided within the updated Framework CTMP, as follows:</p> <ul style="list-style-type: none"> - Figure 38: Sunnica West Site A - Figure 40: Sunnica East Site A - Figure 42: Sunnica East Site B - Figure 46: Burwell National Grid Substation Extension – Option 2. <p>All of the above accesses are within the Order limits and ecology surveys have been undertaken which has determined that there would be no significant effect as a result vegetation removal, if required.</p>
Transport	Mitigation	<p>In paragraph 3.1.1 it is noted that the diagram 521 warning sign (two-way traffic) and end of clearway sign will be temporarily removed or relocated. It is essential for the safety of vehicles leaving the dual carriageway that the Diagram 521 sign is evident to all traffic in normal use. The CTMP must identify how this will be removed and immediately reinstated as the abnormal load passes.</p>	<p>Noted. In paragraph 5.4.5 of the Framework CTMP [APP-118] it states: <i>‘The requirements for the cranes and AILs along the routes will be discussed and agreed with the relevant local highway authorities, National Highways and police.’</i> All requirements for the removal and replacement of signs will be provided in the detailed CEMP prepared by the Contractor prior to construction and agreed with the local highways authorities.</p>
Transport	AIL movements	<p>La Hogue Road is narrow in places, and it should be established whether opposing traffic can pass without overrunning of the carriageway risking damage to its edge and potential verge rutting.</p>	<p>It is anticipated that the road will be closed, or rolling roadblocks will be used, when the cranes/AILs will be traveling along La Hogue Road and other minor roads in the vicinity of the Scheme. Therefore, there should be no requirement for vehicles to pass the cranes/AILs during transit. In paragraph 5.4.5 of the Framework CTMP [APP-118] it states: <i>‘The requirements for the cranes and AILs along the routes will be discussed and agreed with the relevant local highway authorities, National Highways and police.’</i> All requirements for road closures will be agreed with the relevant local highways authority in advance of the works.</p>

Isleham Parish Council

Applicant responses to issues raised

Theme	Issue	Summary of issue raised	Applicant's response
Consultation	Materials	The consultation document was unnecessarily complicated to read with the Order Limits Change Map showing absolutely no reference points by which the location could be identified.	The Applicant provided details in the covering letter and text on the website confirming the location of the point where the oversailing has been identified and that the change to the Order limits is required.
Consultation	Arrangements	Due to the holiday season and the challenge of obtaining meeting quorums Parish Councils generally don't meet during the month of August. It is therefore not appropriate for Sunnica to be expecting official responses during this identified period.	The Applicant carried out this non-statutory consultation to provide local parish councils and other stakeholders with an opportunity to review the AIL Tracking Report prior to the submission of the changes application to the Examining Authority. Should the Examining Authority accept the application, the AIL report and wider documentation relating to the changes will be available for the parish council and other interested parties to comment on through the Examination process. This is not therefore the only opportunity for the parish council to comment on the AIL report.
Consultation	Arrangements	This is just one of a number of requests from yourselves seeking councillors views on aspects of your planning application. Councillors are annoyed at this apparent piecemeal approach towards consultation with little consideration of the time and consideration that is required to respond properly to your requests.	The Applicant has consulted on its proposed changes and the AIL Tracking Report following the representation received from National Grid Electricity Transmission (NGET) [RR-1289]. The Applicant considers this approach to consultation to be appropriate in advance of submitting its changes application to the Examining Authority.
Consultation	Previous consultation	Sunnica have repeatedly failed to address the issues raised in previous responses, not least your continuing refusal to meet with the residents of Isleham. We are therefore extremely skeptical of this consultation being a genuine desire to hear our views.	The Applicant carried out a targeted consultation on the proposed change to the Order limits and the information included within the AIL Tracking Report only. The Applicant has published the responses that it has received in this report alongside the Applicant's response to the issues raised.

Land interest

Applicant responses to issues raised

Theme	Issue	Summary of issue raised	Applicant's response
Other	Licence agreement	The Trustees noted that your letter of the 25th July 2022 mentions negotiating a licence agreement between Sunnica and the Charity for the temporary use of the land in connection with the transformer delivery. However, to date no terms have been proposed. The Trustees have therefore resolved to reserve their position on the licence agreement for the moment.	The Applicant acknowledges this response and would be happy to commence formal negotiations for a licence if this is confirmed to be something the Charity would like to pursue.
Other	Licence agreement	The Charity is very small, employing no staff, volunteer trustees and a turnover of less than £2k per annum, and exists to alleviate poverty within the village of Freckenham. The Trustees do not consider themselves able to negotiate a licence agreement without professional assistance from a solicitor experienced in such matters. Therefore, please would Sunnica confirm if the Charity's reasonable costs in engaging an appropriate solicitor for the purposes of negotiating a licence would be met in full by Sunnica?	The Applicant acknowledges the Charity's position and would be happy to pay their reasonable professional fees which may be incurred agreeing the licence for the part of the land required for the transportation of AIL's to Sunnica East Site A. WSP are currently the agent instructed for this matter and will continue discussions in that regard.