



SUNNICA ENERGY FARM

EN010106

8.2 Proposed Changes to the Application

Planning Act 2008

Infrastructure Planning (Examination Procedure) Rules 2010



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**The Infrastructure Planning
(Examination Procedure) Rules 2010**

Sunnica Energy Farm

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Planning Inspectorate Scheme Reference	EN010106
Application Document Reference	EN010106/APP/8.2
Author	Sunnica Energy Farm Project Team

Version	Date	Status of Version
Rev 00	30 August 2022	Final

Executive summary

The Sunnica Energy Farm (the Scheme) is the subject of an application for development consent (the Application) that was submitted by Sunnica Ltd (the Applicant) to the Secretary of State for Business, Energy and Industrial Strategy (hereafter referred to as the Secretary of State) via the Planning Inspectorate (the Inspectorate) in November 2021. The Application was accepted by the Inspectorate in December 2021.

Since the Application was submitted, the Applicant received updated information from National Grid Electricity Transmission (NGET) regarding connecting the Scheme to the national electricity transmission system at Burwell National Grid Substation. The Applicant is therefore proposing to change the technical options for the grid connection included in the Application to take account of this new information. As a result, the Applicant now proposes the three minor changes to the Application which are the subject of this report. The proposed changes include:

- a. Change 1 (NMC-01) – Removal of Option 1. Removal of the Burwell National Grid Substation Extension Option 1 from the Scheme.
- b. Change 2 (NMC-02) – 400kV cabling. Change to 400kV cabling within the grid connection routes (Cable Routes A and B) to facilitate grid connection Option 3 (described in Paragraph 2.17 below).
- c. Change 3 (NMC-03) – 33/400kV Transformers. The onsite substations at Sunnica East A, Sunnica East B and Sunnica West A would require a change to the electrical configuration and therefore their general arrangement and layout due to the introduction of a 33kV/400kV transformer in place of the 33kV/132kV transformers, with a shunt reactor introduced at Sunnica East Site B. In addition, NMC-03 includes the transportation of the 33kV/400kV transformer and shunt reactor (Sunnica East Site B only) from the Strategic Road Network (SRN) to each of the onsite substations.

This report has been prepared with regard to paragraphs 109 to 115 of the Department for Communities and Local Government's Guidance *Planning Act 2008: Guidance for the examination of applications for development consent* (the Guidance) and the Planning Inspectorate's *Advice Note 16: How to a request a change which may be material* (Advice Note 16)) and constitutes Step 4 of the process described in Advice Note 16 for requesting a change to an application being "a written material change request asking the Examining Authority to examine the changed application." It contains the information set out in Figure 3 of that Advice Note 16:

- a. A clear description of the proposed change, including any new or altered works and any new or altered ancillary matters, see Section 2.2, Section 3.1, Section 4.1 and Section 5.1.
- b. A statement setting out the rationale and pressing need for making the change with reference to the Examination Guidance, any relevant National Policy Statement(s) as appropriate and any other important and relevant matters, see Section 1.1, Section 1.2 and Section 1.3.
- c. A full schedule of all application documents and plans (including those related to the compulsory acquisition and temporary use of land) listing consequential revisions to each document and plan, see Table 3.3, Table 4-3 and Table, 5-3, and a statement confirming that the changes, if accepted, do not reflect an impediment to the grant of

any other consents and licences required outside of the DCO process, see Section 2.3.8.

- d. As the changes would result in alterations to the Order land, a statement confirming that the Infrastructure Planning (Compulsory Acquisition) Regulations 2010 (CA Regulations) do not apply, see Section 2.6.
- e. The findings of the environmental appraisal of each requested change which confirms that the likely significant environment effects have been adequately assessed in the Environmental Statement submitted with the application and that the environmental information contained within the Environmental Statement has met the publicity requirements of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, see Table 3-1, Table 4-1 and Table 5-1.
- f. A consultation statement describing the non-statutory consultation that has been carried out by the Applicant together with copies of the consultation responses received, see Sections 2.4 and 2.5 and Table 2-3 and Table 2-4 for summary of responses. See Appendix O for full set of responses, Appendix M for a copy of the responses received and Appendix N for the Consultation document and banners.

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1 Introduction

1.1 Purpose of this Report

- 1.1.1 The Sunnica Energy Farm (the Scheme) is the subject of an application for development consent (the Application) that was submitted by Sunnica Ltd (the Applicant) to the Secretary of State for Business, Energy and Industrial Strategy (hereafter referred to as the Secretary of State) via the Planning Inspectorate (the Inspectorate) in November 2021. The Application was accepted by the Inspectorate in December 2021.
- 1.1.2 The application is currently at the pre-examination stage. The Preliminary Meeting is likely to be held at the end of September, which will determine how the application is examined.
- 1.1.3 Since the Application was submitted and despite the Applicant's extensive pre-application engagement, the Applicant received updated information from National Grid Electricity Transmission (NGET), provided in Appendix R, regarding connecting the Scheme to the national electricity transmission system at Burwell National Grid Substation. The Applicant is therefore proposing to change the technical options for the grid connection included in the Application to take account of this new information. As a result, the Applicant now proposes the three minor changes to the Application which are the subject of this report and which will be presented to the Examining Authority prior to the Preliminary Meeting.
- 1.1.4 In accordance with Figure 1 of the Planning Inspectorate's Advice Note 16: How to request a change which may be material, this report is Step 4 "Applicant makes a written material change request". Steps 1 to 3 are discussed further in the following section.
- 1.1.5 This report has been prepared with regard to paragraphs 109 to 115 of the Department for Communities and Local Government's Guidance Planning Act 2008: Guidance for the examination of applications for development consent (the Guidance) and the Planning Inspectorate's Advice Note 16: How to a request a change which may be material (Advice Note 16))and constitutes Step 4 of the process described in Advice Note 16 for requesting a change to an application being "a written material change request asking the Examining Authority to examine the changed application." It contains the information set out in Figure 3 of that Advice Note 16:
- a. A clear description of the proposed change, including any new or altered works and any new or altered ancillary matters, see Section 2.2, Section 3.1, Section 4.1 and Section 5.1.
 - b. A statement setting out the rational and pressing need for making the change with reference to the Examination Guidance, any relevant National Policy Statement(s) as appropriate and any other important and relevant matters, see Section 1.1 (this section), Section 1.2 and Section 1.3.
 - c. A full schedule of all application documents and plans (including those related to the compulsory acquisition and temporary use of land) listing consequential revisions to each document and plan, see Table 3.3, Table 4-3 and Table, 5-3, and a statement confirming that the changes, if accepted, do not reflect an

- impediment to the grant of any other consents and licences required outside of the DCO process, see Section 2.3.8.
- d. As the changes would result in alterations to the Order land, a statement confirming that the Infrastructure Planning (Compulsory Acquisition) Regulations 2010 (CA Regulations) do not apply, see Section 2.6.
 - e. The findings of the environmental appraisal of each requested change which confirms that the likely significant environment effects have been adequately assessed in the Environmental Statement submitted with the application and that the environmental information contained within the Environmental Statement has met the publicity requirements of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, see Table 3-1, Table 4-1 and Table 5-1.
 - f. A consultation statement describing the non-statutory consultation that has been carried out by the Applicant together with copies of the consultation responses received, see Sections 2.4 and 2.5 and Table 2-3 and Table 2-4 for summary of responses. See Appendix O for full set of responses, Appendix M for a copy of the responses received and Appendix N for the Consultation document and banners.

1.2 Procedural background

- 1.2.1 Sunnica included in its Application two options for an extension to the Burwell National Grid Substation. These two options are described in section 3.3 of the Grid Connection Statement **[APP-265]**. Under both Option 1 and 2 the extension comprises a new substation required by Sunnica for its Scheme. The substation would be retained by the owner of the Sunnica Energy Farm and it would not be owned or operated by National Grid. The substation would include transformers to connect the 132kV cables connecting to the solar farm with the 400 kV transmission network. In other words, the “extension” would not form part of National Grid’s assets or undertaking. Of the two options, Option 1 is located on National Grid owned land and Option 2 is located on third party land in respect of which Sunnica does not hold any relevant interest. Sunnica has the benefit of a modified connection agreement with National Grid, which was in place at the point it made its Application. Furthermore, Sunnica had undertaken detailed discussions during the pre-submission period over many months with National Grid in connection with its proposals on the Option 1 land and as such had confidence in Option 1.
- 1.2.2 Despite extensive pre-application consultation, following submission of the development consent application NGET stated in its written representation that *“Option 1 is not technically feasible given the amount of land now required by the Promoter, the planned extension of the substation and NGET’s licence obligations.”* Sunnica’s connection agreement with National Grid involves Sunnica utilising a spare “bay” inside the existing Burwell Substation. However, in order to connect this new customer, Sunnica understands that National Grid needs to extend its own asset (which it does not need to do for Sunnica). Accordingly, as far as Sunnica understands, National Grid is proposing to extend its own asset, which would be owned and operated by National Grid. National Grid is a regulated entity and must use land under its existing ownership before it can acquire additional land. It is as a consequence of this recent chain of events that

the Option 1 land is understood to be no longer available for Sunnica as it is now required by National Grid itself for its own extension to accommodate this new customer.

- 1.2.3 Shortly after being notified of this change in circumstances, on 30 March 2022 the Applicant wrote (see [AS-018]) to the Examining Authority to seek a delay to the start of the Preliminary Meeting to afford it and NGET the time needed to understand the technical implications and to determine a way to progress the matter.
- 1.2.4 On 19 April 2022 the Applicant wrote to the Examining Authority to notify it of its decision to request changes to its application (see [AS-017]). Following further queries from the Examining Authority [PD-005] which were answered by the Applicant in its letter of 28 April 2022 [AS-020] which outlined the changes to the application being contemplated by the Applicant, together with its consultation method statement [AS-233] explaining its proposals to carry out non-statutory consultation in relation to those changes, the Examining Authority confirmed in its letter of 26 May 2022 [PD-008] that the Applicant's submissions comprised Step 1 of the process set out in Figure 1 of Advice Note 16.
- 1.2.5 The advice contained in the Examining Authority's letter of 26 May 2022 constituted Step 2 of that process.
- 1.2.6 As is reported in greater detail in Sections 2.4 and 2.5 of this report the Applicant then carried out non-statutory consultation in relation to its proposed changes between 6 June and 6 July 2022, comprising Step 3 of the process set out in Figure 1 of Advice Note 16.
- 1.2.7 As a result of additional technical assessment information received following the close of the non-statutory application, the Applicant identified a need to make a further minor amendment to the Order limits to accommodate the passage of Abnormal Indivisible Loads (AILs) and as a consequence delayed submission of its Step 4 Change Request in order to consult with the landowners affected and to seek the views of the relevant local authorities and Parish Councils.

1.3 Legal, guidance and advice notes applied

- 1.3.1 In bringing forward the proposed changes which are the subject of this request to make three minor changes to the Scheme, the Applicant has taken into account the same legislation and policy considered in the Application.
- 1.3.2 The Applicant has also had regard to the Inspectorate's Advice Note 16: How to request a change that might be material (Version 2, March 2018) (AN16) and to paragraphs 109 to 115 (Changing an application post acceptance) of the Planning Act 2008: Guidance for the examination of applications for development consent (DCLG, March 2015) (the Examination Guidance).
- 1.3.3 In carrying out consultation on the three minor changes to the Scheme, the Applicant has had regard to the benchmark for fairness in relation to consultation on changed applications, as set by the case of R (on the application of Holborn Studios Ltd) –v- Hackney LBC [2017] EWHC 2823 (Admin), in which Judge Howell decided that the question which Hackney LBC should have asked itself, in considering a changed planning application, was "whether, without re-

consultation, any of those who were entitled to be consulted on the application would be deprived of the opportunity to make any representations that they may have wanted to make on the application as amended.”

- 1.3.4 In the absence of re-consultation on the changed application, Judge Howell held that Hackney LBC had "deprived the claimants and others of a fair opportunity to make such representations as they might have wanted to make about them and that materially prejudiced the claimants. The procedure followed in the circumstances was so unfair as to be unlawful."

2 Scope of this Report

2.1 Need for the change

- 2.1.1 The proposed Scheme would include both solar photovoltaic (PV) and battery energy storage (BESS) infrastructure. The Scheme is located on land spanning the border between Suffolk and Cambridgeshire.
- 2.1.2 The Scheme would be located across four sites:
- a. Sunnica East Site A, near Isleham;
 - b. Sunnica East Site B, near Freckenham and Worlington;
 - c. Sunnica West Site A, near Chippenham and Kennett; and
 - d. Sunnica West Site B, near Snailwell.
- 2.1.3 The four sites would be connected to each other and the Burwell National Grid Substation by an underground cable. The Scheme would allow for the generation, storage, import, and export of electricity.
- 2.1.4 To facilitate the grid connection at Burwell, the Applicant needs to provide a substation or transformer capable of upgrading the voltage of the electricity generated by the Scheme to 400 kilovolts (kV). Within the application, the Applicant included two options for extending the Burwell National Grid Substation to do this. Within the application, these are called Option 1 and Option 2 (see Figure 2-1 below).
- 2.1.5 Through the relevant representations process, the Applicant was made aware of the representation made by NGET. This representation stated that one of the two grid connection options, Option 1, is considered 'not technically feasible' by NGET.
- 2.1.6 Following NGET's representation, the Applicant has revisited the technical solutions available to connect the Scheme into the NGET infrastructure at Burwell to seek to minimise compulsory acquisition requirements and environmental effects. This is particularly appropriate given that Option 2 would require the compulsory acquisition of land, at this stage, as the landowner has indicated his objection to taking forward any voluntary agreement.
- 2.1.7 This design work has resulted in the identification of an additional option for the grid connection, referred to as 'Option 3'. Option 3 involves transforming the 33kV received from the solar stations within the PV Sites directly to 400kV for export to the Burwell National Grid Substation. In taking Option 3 forward and discounting Option 1, the Applicant needs to make changes to our application documentation to reflect the updated position.
- 2.1.8 Option 2 has not been discounted at this stage and is retained in the Application whilst discussions continue with NGET about Option 3. Once NGET have confirmed that they are content with Option 3, the Applicant would seek to remove Option 2 from the Application. As such the changes to the Application sought by the Applicant retain flexibility to deliver either Option 2 or Option 3.

- 2.1.9 Option 3 was not taken forward at the pre-submission phase as 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 was to fail which is not possible for 400kV. Therefore, the commercial risk profile was not considered acceptable to the Applicant. However, Option 2 requires the use of compulsory purchase powers over third party land. In light of this new information the Applicant reviewed all potential options again and determined that the risk involved with the lack of redundancy in having a single circuit with a 400kV cable versus two circuits with 132kV cables was acceptable given that this would avoid the compulsory acquisition requirements. On review the Applicant, is willing to accept this risk now as it considers that that any issue with the 400kV cable could be rectified quickly and that the risk of damage is relatively minor.
- 2.1.10 Further detail of the changes is provided in the section below and Chapter 3 to 5 of this report.

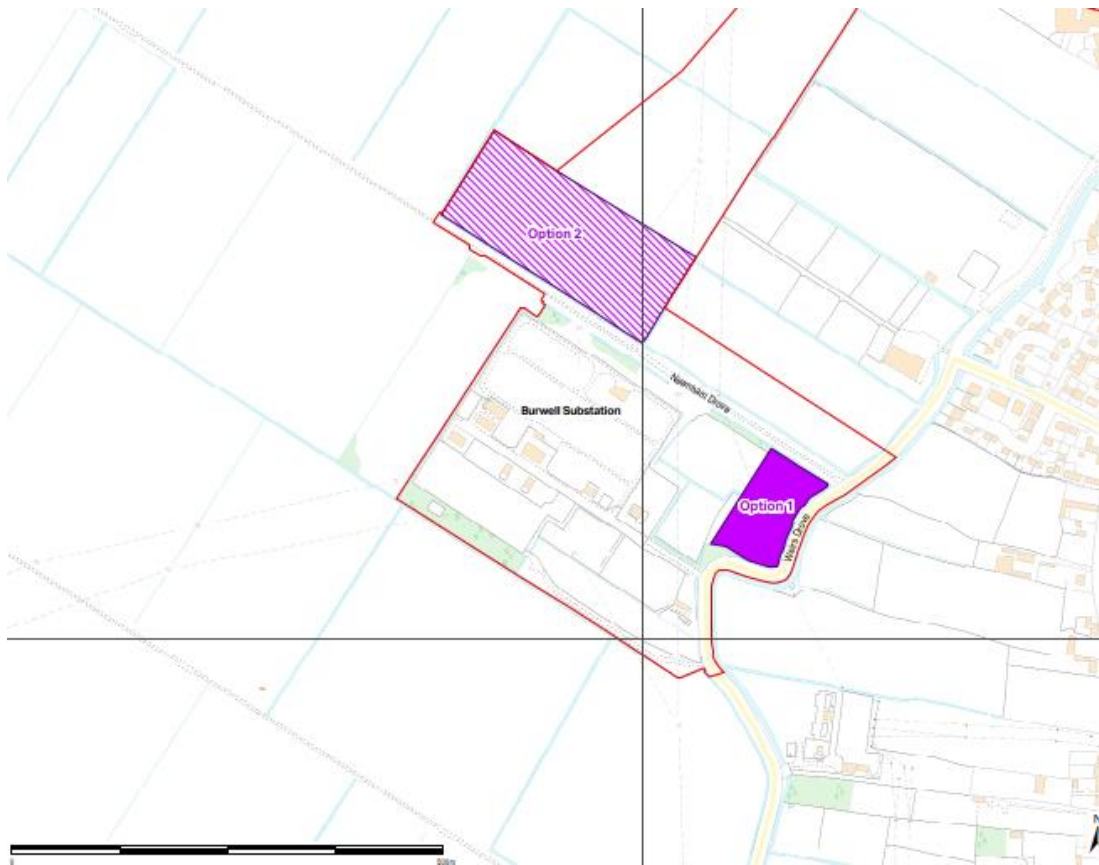


Figure 2-1: Burwell National Grid Substation Options 1 and 2

2.2 Summary of changes

2.2.1 There are three proposed changes to the Scheme, full details of which are set out in the following chapters of this report. Each of the three proposed changes is identified by a unique reference number with the prefix 'NMC' , followed by an identification number. In summary these are:

- a. Change 1 (NMC-01) – Removal of Option 1. Removal of the Burwell National Grid Substation Extension Option 1 from the Scheme.
- b. Change 2 (NMC-02) – 400kV cabling. Change to 400kV cabling within the grid connection routes (Cabe Routes A and B) to facilitate grid connection Option 3.
- c. Change 3 (NMC-03) – 33/400kV Transformers. The onsite substations at Sunnica East A, Sunnica East B and Sunnica West A would require a change to the electrical configuration and therefore their general arrangement and layout due to the introduction of a 33kV/400kV transformer in place of the 33kV/132kV transformers, with a shunt reactor introduced at Sunnica East Site B. This change is required to facilitate grid connection Option 3. In addition, NMC-03 includes the transportation of the 33kV/400kV transformer and shunt reactor (Sunnica East Site B only) from the Strategic Road Network (SRN) to each of the onsite substations.

2.2.2 It is important to note that, while Changes 2 and 3 are presented as separate changes, both changes are required to enable grid connection Option 3 to be taken forward.

2.2.3 Chapter 3: Scheme Description **[EN010106/APP/6.1]** of the ES and the Design and Access Statement **[EN010106/APP/7.3]** have been updated to reflect the above three changes. However, it is important to note that no changes are required to the Design Principles at Appendix B of the Design and Access Statement, which are secured by the DCO. The location of these changes are provided on Figure 2-2.

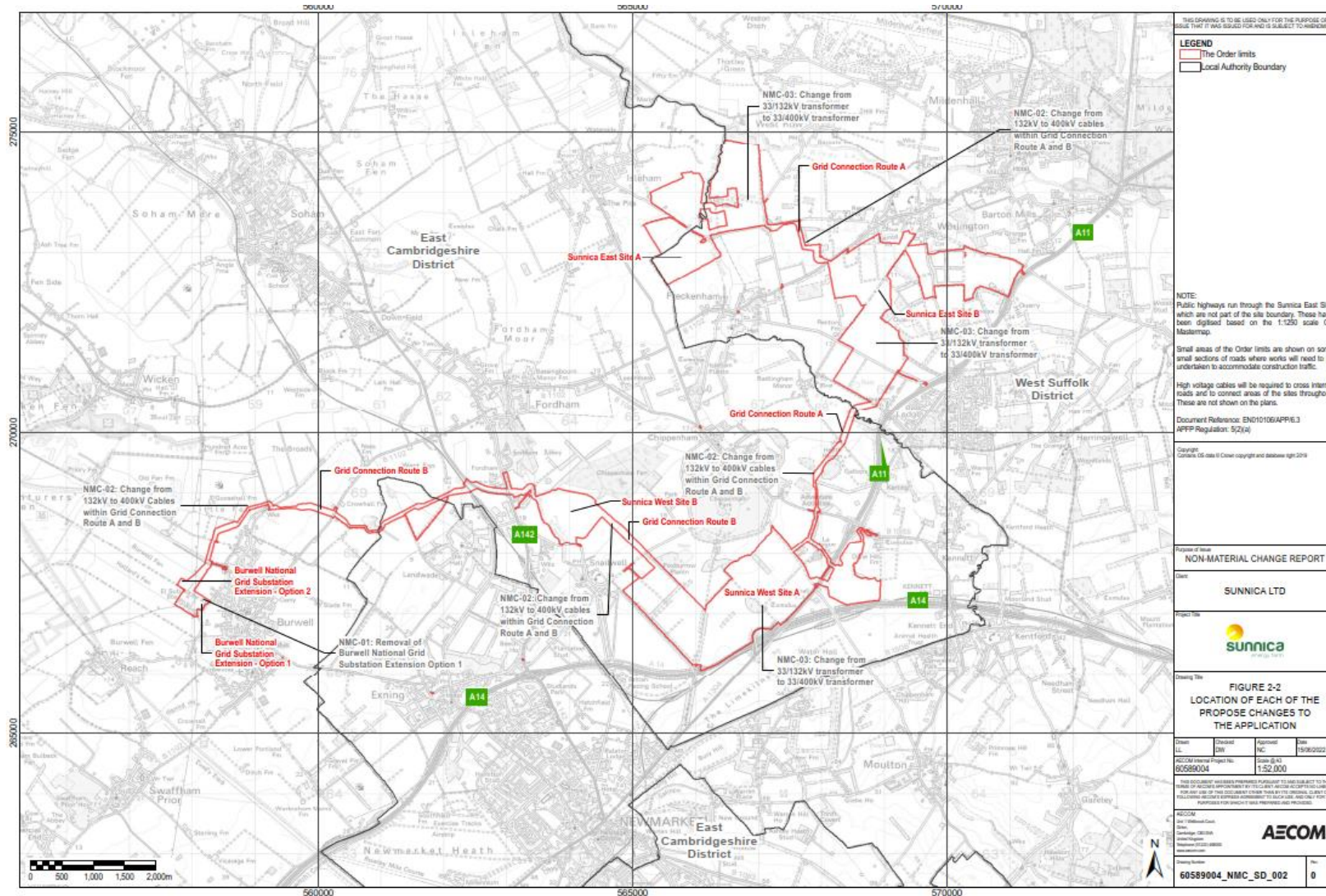


Figure 2-2: Location of each of the proposed changes to the Application

- 2.2.4 The following chapters of this report set out the detail of the proposed changes. A chapter has been dedicated to each change.
- 2.2.5 In addition to explaining the nature of the change and the reason why it is proposed, each chapter also includes 'before and after' sketches, where relevant. These sketches are based on selected plans and drawings submitted with the Application, in order to show how the Scheme would differ as a result of the proposed change.
- 2.2.6 Where relevant, the 'before' sketches include extracts from the current versions of the selected Application plans. The 'after' sketches indicate how the current versions of those plans / drawings would be amended to give effect to the proposed changes, should the Examining Authority accept the proposed change as part of the Application and therefore for inclusion in the examination of the Application.
- 2.2.7 Each chapter presenting a proposed change includes a summary of the findings of the environmental appraisal carried out in respect of that proposed change, together with a table setting out the detail of the appraisal that has been carried out.
- 2.2.8 Each chapter also contains a Schedule of Engagement identifying the persons with an interest in land affected by the proposed change and the persons with whom the Applicant has engaged and/or proposes to engage in respect of the proposed change.
- 2.2.9 In addition, each chapter includes a Schedule of Consequential Amendments listing the original Application documents (or parts thereof) which would need to be amended by the Applicant if the proposed change in question was accepted into the examination of the Application by the Examining Authority. Further to the comments in the Examining Authority's Procedural Decision PD-008, appended to this Report are track changed versions of the documents identified in this Schedule as well as copies of the relevant sheets of the sets of plans that would be proposed to be updated as a result of the changes. Alongside this application, the Applicant has submitted the full "clean" versions of these documents that could be accepted into the examination, if the Examining Authority accepts this changes application.

2.3 Environmental appraisal of the proposed changes

- 2.3.1 Each proposed change has been reviewed and assessed to identify any likely significant effects that would be new or materially different from those reported in the technical chapters of the Scheme's Environmental Statement (ES) **[APP-036 and APP-038 to APP-048]**.
- 2.3.2 In assessing the proposed changes, the Applicant has considered whether, or to what extent, the change might alter the description of the relevant element of the development within the ES, provided in compliance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations), which sets out how an ES should describe a proposed development for the purposes of environmental impact assessment.
- 2.3.3 In addition, the Applicant has considered:

- a. The degree of change in the context of the Scheme as a whole (i.e. whether it is significant or minor);
- b. The effect of the change in environmental terms (i.e. whether it would result in a change to the findings of the assessment carried out in respect of the Scheme prior to submission of the Application); and
- c. The effect of the change on the local community (i.e. what effect, if any, it would have on the local community).

2.3.4 Having considered the proposed changes in light the EIA Regulations, the Applicant has identified whether each of the proposed changes would result in a 'material change', a 'non-material change', or 'no change' to the assessment for each relevant topic within the Scheme's ES.

2.3.5 A proposed change is considered to result in a finding of:

- a. No change where the proposed change will not result in any change to the findings of the original assessment.
- b. Non-material where the proposed change does not change the severity or the scope of the effect as presented in the original assessment.
- c. Material where it resulted in a significant change in the scope or the findings of the original assessment.

2.3.6 Consideration has also been given as to whether the changes would result in updates being required to the Habitats Regulations Assessment documentation submitted with the Application, or whether a new EPS licence would be required as a consequence of the change.

2.3.7 The environmental appraisal for each of the proposed changes are provided in the Chapters 3 to 5 of this report.

2.3.8 The Applicant has also considered where the proposed changes would affect the other consents that the Applicant may be required to obtain outside of the DCO process. After review, the Applicant considers that the nature of the proposed changes are such that they would not reflect an impediment to the grant of any of those other consents and licences required outside of the DCO process.

2.4 Non-statutory consultation on the proposed changes

2.4.1 The Applicant consulted on the proposed changes between 6 June and 6 July 2022.

2.4.2 In developing its approach to consultation, the Applicant considered Planning Inspectorate Advice Note 16: How to request a change that might be material.

2.4.3 Before the consultation, the Applicant sought advice from the Planning Inspectorate and the host local authorities for the Scheme on its proposed approach to consultation. To this end, the Applicant submitted a method statement detailing its proposed approach to consultation on 20 May 2022 and met with officers from the four host local authorities on 30 May 2022.

2.4.4 The Applicant had regard to the Examining Authority’s response to the method statement contained within its letter of 26 May 2022. Table 2-1 below summarises the response received from the Examining Authority regarding consultation and the regard had to it by the Applicant.

Table 2-1: Regard had to Examining Authority comments on Applicant’s proposed approach to consultation

Examining Authority’s comment	Regard had by Applicant
As identified, this should include any changes to the Section 56 notification list as certified in the certificate of compliance dated 30 March 2022.	The Applicant included changes to the Section 56 notification list as certified in the certificate of compliance dated 30 March 2022. This is summarised in Appendix B and C.
A minimum of 28 days should be given for responses to this consultation, and newspaper and site notices should be posted.	The Applicant provided 30 days for responses. Details of site and newspaper notices are provided at 2.4.9
The ExA suggests that the Applicant also considers consulting any persons likely to be affected by the proposed new substation site, notwithstanding the likelihood that this will be within the Order limits.	The Applicant considers that the notification areas set out in 2.4.11 and 2.5.9 captured all persons likely to be affected by the changes, including the changes to the layout of the substation sites.
We note further the Applicant’s intention to provide briefings to relevant stakeholders, however given the concerns raised in relation to the opportunity for engagement during the pandemic, we suggest the Applicant should consider holding a public meeting as part of the consultation on the proposed changes.	In response to the Examining Authority’s comment, the Applicant arranged two public exhibitions about the proposed changes. Further details are provided at 2.5 below.

2.4.5 The Applicant defined the following audiences for consultation:

- a. Persons or bodies notified of the application under Section 56 of the Planning Act 2008; and
- b. Members of the local community likely to be directly affected by the proposed changes, defined as residents living within a half mile radius of the substations affected by Options 1, 2 and 3.

2.4.6 The Applicant amended its consultation area to include (B) above in response to comments received from officers at the four host local authorities during the pre-consultation meeting held on 30 May 2022.

2.4.7 The Applicant prepared a consultation document summarising the proposed changes, including a non-technical description of the changes, why they are necessary, why the Applicant considered that the changes are likely to be considered as non-material, initial considerations of the impacts from the changes on the Environmental Statement and other application documents, and how to take part in the consultation.

2.4.8 The Applicant made this document available from the first day of the consultation period, 6 June 2022, on its website, on request, or at the following deposit points in the vicinity of the proposed changes:

- a. Burwell Library, Village College, Burwell, Cambridgeshire, CB25 0DU; and

b. St Margaret's Church, High Street, Chippenham, Ely, CB7 5PP.

- 2.4.9 The Applicant was made aware on 23 June 2022 that St Margaret's Church, Chippenham no longer wished to make hard copies of the changes document available on deposit. The Applicant therefore made additional copies of the changes document available from Red Lodge Sports Pavilion, Hundred Acre Way, Red Lodge, IP28 8FQ on the following day. The Applicant updated its website to reflect this change in arrangements.
- 2.4.10 The Applicant also wrote directly to the consultees identified in 2.4.5 providing notice of the consultation, enclosing a copy of the consultation document and inviting comment by the deadline of 6 July 2022. Copies of all of these letters are included in Appendix A.
- 2.4.11 In addition, the Applicant publicised the consultation by placing a note of the proposed changes and how to respond to the consultation on its website and in the Ely Standard and Newmarket Journal on 2 June 2022 and 9 June 2022. A copy of the notice is included in Appendix A.
- 2.4.12 The Applicant invited consultees to provide comments in writing to the Applicant at info@sunnica.co.uk or Sunnica Energy Farm NMC Consultation, Freepost SEC NEWGATE UK LOCAL by the deadline of 6 July 2022.
- 2.4.13 The Freephone number, email address already put in place by the Applicant during pre-application consultation remained available for enquiries.
- 2.4.14 The Applicant sought to respond to all enquiries that it received to the channels outlined in 2.4.12 during the consultation. In response to a number of enquiries, the Applicant produced a list explaining terms used within the consultation document and uploaded this to the project website. In addition to this, the Applicant showed illustrations of the amended on-site substation arrangements at the public exhibitions outlined in 2.5.2. These illustrations were subsequently uploaded to the Applicant's website.

2.5 Engagement with relevant parties on the proposed changes

- 2.5.1 The Applicant conducted a programme of stakeholder and community engagement to support its consultation.
- 2.5.2 This comprised organising two public exhibitions in the vicinity of the proposed changes. These took place at:
- a. 1530 – 1930 on Wednesday 22 June 2022 at the Mandeville Hall, Burwell, Cambridgeshire, CB2 0AR
 - b. 1430 – 1830 on Thursday 23 June 2022 at Chippenham Village Hall, 44B High Street, Chippenham, Ely, CB7 5PR
- 2.5.3 The Applicant selected these dates to allow attendees sufficient time following the exhibitions to respond to the consultation.
- 2.5.4 The exhibition comprised eight information boards and offered the opportunity for members of the community to meet with the Applicant's project team in person

and ask questions. Attendees could also collect a copy of the consultation document and respond to the consultation at the exhibitions.

- 2.5.5 The Applicant publicised the exhibition by writing to addresses shown in the area in Figure 2-3. This is the same area as the core consultation zone identified within the Statement of Community Consultation published by the Applicant prior to the submission of its DCO Application.

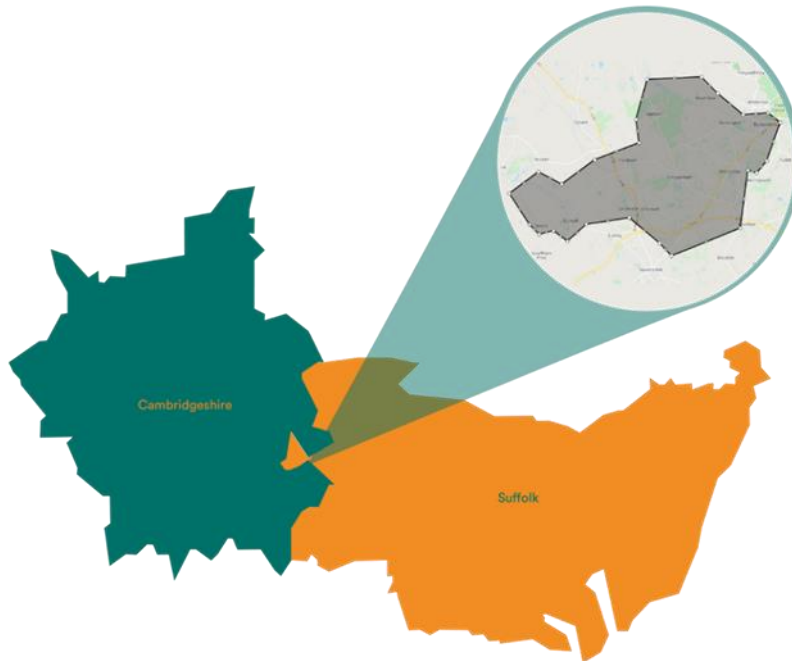


Figure 2-3: Notification area for public exhibitions

- 2.5.6 The Applicant also invited elected representatives from the four host local authorities, Burwell Parish Council, Exning Parish Council, Snailwell Parish Council, Fordham Parish Council, Chippenham Parish Council, Isleham Parish Council, West Row Parish Council, Worlington Parish Council, Freckenham Parish Council, Red Lodge Parish Council, Kennett Parish Council, Lucy Frazer MP and Matt Hancock MP to a preview of the public exhibitions. These took 30 minutes before each exhibition.
- 2.5.7 As noted above, the Applicant also sent letters to all Categories of persons with interests in the land identified in section 57 of the Planning Act 2008, based on the latest land referencing information it holds, relating to the plots shown on the Land Plans that are affected by the proposed change (in Change 1, as a result of the proposed change of land powers required, and for the other Changes, the plots in which the change in approach to works, will take place).
- 2.5.8 In sections 3 to 5 below, the parties contacted on this basis are identified, with confirmation as to whether that party are an 'Interested Party' or 'Affected Party' for the purposes of the Infrastructure Planning (Examination Procedure) Rules 2010.
- 2.5.9 In order to notify any unknown interests, the Applicant erected site notices within close proximity to each location on 7 June 2022 and monitored them weekly

thereafter. These unknown interest locations are the same as those included in the Section 56 site notice notification methodology.

- 2.5.10 The Applicant also notes occasions where affected parties were further engaged after being notified of the proposed changes. Each instance is explained in Table 2-2.

Table 2-2: Further engagement with affected parties following change consultation letter

Affected party	Type of interest	Further engagement following issuing of consultation correspondence on 2 June 2022
Tony Slatter	Rights	During the second week of unknown interest site notice monitoring (16 June 2022) the affected party spoke with the site team and requested that the notice outside their property be taken down. The decision was taken to remove the notice closest to the property, however, the notice adjacent to the First Drove access gate remained in situ.
Thomas Henry Scott	Subsoil	A letter outlining the proposed changes was issued to the affected party on 2 June 2022, however the item was undelivered. Subsequently, the same letter was hand delivered to the newly identified contacts on 15 June 2022 (Max Frederick Harradine and Amy Claire Farrington). A further letter was issued on 5 July 2022 to provide notification that the consultation response date has been extended to 17 July 2022 to allow for 28 clear days.
Kevin Neil Arrowsmith	Rights	A letter outlining the proposed changes was issued to the affected party on 2 June 2022, however the item was undelivered. Subsequently, the same letter was reissued to the successors to the interest (David Stuart Sheldrake and Nicola Jane Sheldrake) on 24 June 2022 and the date for comments to be provided extended to 17 July 2022.
Michael Heywood and Carolyn Awdry Heywood	Subsoil	Letter correspondence outlining the proposed changes was hand delivered on 7 June 2022 due to a previous history of undelivered items.
Apostolos Andreou and Wendy Elizabeth Andreou	Subsoil	Letter also issued to land agent 6 June as done so in Section 56 methodology.
Burwell 11 Solar Limited	Beneficiary	Letter also issued to alternative email address 6 June as done so in Section 56 methodology
Lightsource SPV 115 Limited	Rights	Letter also issued to alternative email address 6 June as done so in Section 56 methodology
South Staffordshire Water plc	Rights	Letter also issued to alternative email address on 6 June as done so in Section 56 methodology.
Richard Seymour Paley Tuke	Freehold, Rights and Subsoil	Letter also issued to land agent on 6 June 2022.
Donald Seymour Tuke	Freehold, Rights and Subsoil	The Applicant notified Mr D Tuke of the proposed DCO changes by issuing the consultation correspondence to their land agent on 6 June 2022. This has been the

Affected party	Type of interest	Further engagement following issuing of consultation correspondence on 2 June 2022
		primary method of contact with the landowner and reflects the practice used for the Section 56 correspondence issuance as a new address for service was yet to be confirmed. Subsequent chases were sent to the landowner's agent by email on 17 June, 13 July and 16 August 2022 and phone on 28 June 2022 requesting the new address to be confirmed. The revised address for the landowner is presently still awaited.'
HPUT A Limited and HPUT B Limited	Freehold	Letter also issued to land agent and solicitor on 6 June as done so in Section 56 methodology.
Energis Communications Limited	Rights	Email sent to agent on 1 July following query regarding consultation correspondence.

2.5.11 The Applicant received 54 responses to the 6 June to 6 July consultation. The issues raised in these responses, and the Applicant's response to these issues is set out in Appendix O and is summarised in Table 2-3.

Table 2-3: Summary of responses received during 6 June to 6 July consultation and the Applicant's response to them

Summary of issue raised	Applicant's response
Location	
BT has an exchange potentially impacted by your proposals, known as Isleham UAX.	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	
Do National Grid plan on building on the Option 1 land? If they do, how will you connect to the Grid? Especially if Option 2 is no longer viable.	Within its Relevant Representation [RR-1289], National Grid Electricity Transmission (NGET) states 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."

Summary of issue raised	Applicant's response
	Option 2 remains technically feasible.
Will there be new land acquisition required as a result of the amended cable routes across the Scheme?	The proposed Change 2 does not require that any land is added to the Order limits. The proposed 400kV cabling can be accommodated within the existing Order limits.
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 rights over this land will still be required to facilitate the connection to the Burwell National Grid Substation under both Option 2 and Option 3. However, the acquisition of rights is a lesser imposition than the acquisition of the land.</p> <p>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	
What would installing a shunt reactor at Sunnica East Site B involve?	<p>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.</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 [EN010106/APP/6.1] and in the Design and Access Statement [EN010106/APP/7.3].</p>
What are the changes to the cable route?	The cable route itself remains unchanged. It will continue to follow the same route as that specified within the DCO submission documents (see Figure 1-1 of the Environmental Statement [APP-129]). The specifications for a 400kV cable and associated works are likely to require a smaller footprint than the 132kV cables that would be required under grid connection options 1 and 2. However, the consideration of this change in the Changes Report has assumed the maximum parameters from the 132kV cable route options.
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> <p>Sunnica East Site A: 85m by 55m footprint, 10m in height.</p> <p>Sunnica East Site B: 85m by 130m footprint, 10m in height.</p>

Summary of issue raised	Applicant's response
	<p>Sunnica West Site A: 85m by 130m footprint, 10m in height.</p> <p>Further information on the on-site substations is given in Chapter 3: Scheme description of the Environmental Statement [EN010106/APP/6.1]. The Applicant has provided further information on its proposed changes to the on-site substation arrangements within Chapter 6 of this document.</p>
<p>Insufficient information has been provided as to the layout of the BESS/substation areas.</p>	<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>
<p>What happens if Option 3 proves not to be feasible? Will there be other new options?</p>	<p>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).</p>
<p>Consultation</p>	
<p>Insufficient information has been presented as to the nature of the changes and their resultant impacts.</p>	<p>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.</p>
<p>The visualisations of the changes provided as part of the consultation were insufficient.</p>	<p>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.</p>

Summary of issue raised	Applicant's response
<p>The public exhibitions were insufficient.</p>	<p>The Applicant believes that it has consulted appropriately given the scope of the non-statutory consultation on its proposed changes. 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.</p> <p>The Applicant organised the consultation events in response to comments made by the Examining Authority [PD-008]. 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.</p> <p>The consultation arrangements 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.</p>
<p>All interested parties should have received a consultation booklet.</p>	<p>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.</p>
<p>DCO Application</p>	
<p>The DCO application should never have been submitted to The Planning Inspectorate in November 2021 unless a signed contract was available with National Grid.</p>	<p>Sunnica has a signed Bilateral Connection Agreement with National Grid. National Grid has confirmed in their letter on 11 July 2022 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'.</p>
<p>The changes represent a material change to the DCO.</p>	<p>The Applicant respectfully disagrees, and Chapter 2 of the changes report explains why it is considered that the changes are non-material.</p>
<p>If a modified application is submitted, we would expect all documents to be updated accordingly, including the EclA, landscape plans, CEMP and LEMP.</p>	<p>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. As such there is no intention to update the current suite of mitigation documents; apart from where identified in the</p>

Summary of issue raised	Applicant's response
	relevant sections of this Report to ensure consistency across the suite of documents and in response to the procedural decisions of the ExA.
Details of the proposed changes should not be subject to the Rochdale Envelope.	<p>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 [EN010106/APP/3.1] and supporting Works Plans [EN010106/APP/2.2] 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's Advice Note 9.</p> <p>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.</p>
Construction	
There will be a requirement for significant removal of roadside vegetation which would create an environmental impact.	The AIL's would require very minimal vegetation clearance. The locations where vegetation may require clearance have been assessed by an ecologist and assessed as not leading to significant adverse environmental effects.
How exactly will the construction methodology required differ (as stated) from the DCO application?	The construction methods are not anticipated to change; 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 increase for these works it is still within the total 24-month construction programme.
Operations	
How will the proposed changes affect the import and export of energy to the grid by Sunnica?	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	
Assurance is required 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	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 would remain the same.
What will be the impact of Change 3 on levels of disturbance to birds, such as Stone Curlews, as a result of changed staff and	The proposed changes will not result in the need for additional staff or vehicle movements.

Summary of issue raised	Applicant's response
vehicle movements, and changes to the timings or duration of works?	<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 decibels (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>
Landscape and visual amenity	
Further information is required to fully assess the visual impacts of the proposed changes on the landscape.	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.
Option 3 has no material impact on the existing approved scheme and avoids further unsightly electrical equipment at 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.
Would the revised substation arrangements have the same skyline, be more intrusive, or be bulkier?	<p>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.</p> <p>The Applicant considers the photomontages [APP-215 to APP-232] to still represent the visual impact of the proposed Scheme including the revised substation arrangements.</p>
Transport and access	
What impact will the changes have on highways?	The proposed changes will not impact on the proposed haulage routes; however, larger Abnormal Indivisible Load (AIL) vehicles will be required to transport the 400kV transformer to Sunnica West Site A, Sunnica East Site A and Sunnica East Site A, 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

Summary of issue raised	Applicant's response
	location to accommodate the over-sail of the trailer at the junction.
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 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.
Human health	
The introduction of further electrical equipment at the substations will increase the risk of fire.	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.
The revised cabling arrangements and increase in voltage (400kV rather than 132kV) will create electromagnetic field impacts which will be a health and safety risk.	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%.
A risk assessment should be included in 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	
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 1?	<p>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 decibels (dB).</p> <p>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>
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	
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.

Summary of issue raised	Applicant's response
Other	
The changes to the substations and cabling 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.
The DCO application should not have been submitted until a suitable agreement with NGET was in place.	<p>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.</p> <p>Sunnica holds a contracted position with National Grid for a Bilateral Connection and NGET has confirmed in writing on 11 July 2022 that "This does not affect Sunnica's connection agreement with NGET at the Burwell 400kV substation and bays remain allocated for the connection."</p>

- 2.5.12 The Applicant consulted on the proposed changes for the Abnormal Indivisible Loads (AIL) aspects of Change 3 between 27 July and 24 August 2022. This was a targeted consultation carried out with affected parties and relevant stakeholders only.
- 2.5.13 The Applicant contacted the freeholder of the affected land on 18 July 2022 to provide provisional notification that a request is proposed to be submitted to the Planning Inspectorate to include parts of their property within the Order limits. As part of this notification, the Applicant asked the landowner if they are able to confirm any additional parties (lessees, mortgagees, rights, beneficiaries, tenants, occupiers, wayleaves) which may hold an interest in the land. The landowner was unable to provide these details as they did not have permission to release their contact information.
- 2.5.14 In order to ensure any additional affected parties were notified of the consultation period a site notice was erected at the entrance to the property on 26 July 2022 and a formal consultation letter issued to the landowner by letter and email on 25 July 2022. Receipt of the latter was confirmed by way of email on 28 July 2022 and discussions are ongoing.
- 2.5.15 A response was received on 1 August 2022, requesting further information regarding Plate 7 of the Abnormal Indivisible Load (AIL) Tracking Report . A copy of the AIL Tracking Report is available to view in Appendix P. The Applicant provided a detailed plan for this location on 2 August 2022 and a further response is awaited. The Applicant provided a detailed plan for this location on 2 August 2022 and a further response is awaited.
- 2.5.16 In addition to consulting those identified as holding an interest in the land, the Applicant also consulted with the following organisations on the change to the Order limits and AIL tracking report:

- a. Suffolk County Council
- b. Cambridgeshire County Council
- c. West Suffolk Council
- d. East Cambridgeshire District Council
- e. National Highways
- f. Burwell Parish Council
- g. Exning Parish Council
- h. Snailwell Parish Council
- i. Chippenham Parish Council
- j. Fordham Parish Council
- k. Freckenham Parish Council
- l. Worlington Parish Council
- m. Kennett Parish Council
- n. Red Lodge Parish Council
- o. Barton Mills Parish Council
- p. Isleham Parish Council
- q. West Row Parish Council

- 2.5.17 The Applicant wrote to each by recorded delivery on 25 July 2022 providing information about the consultation and enclosing a plan of the proposed change to the Order limits and the AIL tracking report. The Applicant was able to confirm receipt of these letters with all of the organisations.
- 2.5.18 Copies of the change to the Order limits plan and AIL tracking report were also uploaded to the Applicant's website at the start of the consultation.
- 2.5.19 In addition to this, the Applicant also provided digital copies of the letter and enclosures to each of the above organisations by email on 26 July 2022.
- 2.5.20 To assist each of the consultees with their response to the consultation, the Applicant wrote to the four host local authorities (Suffolk County Council, Cambridgeshire County Council, West Suffolk Council and Suffolk County Council), National Highways and the Parish and Town Councils' Alliance by email to offer a meeting to discuss the consultation information.
- 2.5.21 West Suffolk Council responded on behalf of the four host local authorities on 2 August 2022 to note that it would be difficult to meet during prior to the consultation deadline but that any enquiries would be shared over email.

- 2.5.22 The Parish and Town Councils' Alliance responded on 9 August 2022 stating that it would be difficult to schedule a meeting with sufficient attendance during August but offered to meet in September following the conclusion of the summer holiday period. The Applicant has written back to accept the offer of a meeting in September. While this meeting will follow the submission of the change request, it is the Applicant's view that the meeting will assist members of the Parish and Town Councils' Alliance in their participation in the Examination should the change request be granted. .
- 2.5.23 National Highways responded on 16 August 2022 to confirm that it had considered the information provided and had no comments to make in response to the consultation.
- 2.5.24 The Applicant has considered the responses that it has received (only from the Local Planning Authorities, Isleham Parish Council and the affected local resident) and responded to them in Appendix O of this document. Copies of the responses received are provided in Appendix M. A summary of the main themes received in response to the consultation on the change to the Order limits and AIL tracking report is given in Table 2-4.

Table 2-4: Summary of responses received during Order limits change and AIL Tracking Report consultation and the Applicant's response to them

Summary of issue raised	Applicant's response
Consultation	
The plan showing the proposed change to the Order limits contained no reference points that would allow the location to 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.
It is inappropriate to consult during August when many people are away and are unable to meet.	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.
Transport	
The Applicant has 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 beyond the public highway except where already identified.	The Applicant considers that the level of detail is sufficient for the stage of the Scheme. However, consultation will continue with the Local Highways Authority regarding their concerns with the use of OS mapping.
The use of ordnance survey (OS) mapping for the swept analysis should be questioned.	The Applicant considers that the level of detail is sufficient for the stage of the Scheme. However, consultation will continue with the Local Highways

Summary of issue raised	Applicant's response
	Authority regarding their concerns with the use of OS mapping.
<p>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.</p>	<p>All affected trees have been assessed by a qualified ecologist. It is considered that all affected trees/hedgerows do not have any bat roost potential, apart from two trees on Weirs Drove. These two trees have low/moderate bat roost potential; however, no bat roosts were identified at the time of the previous. A re-survey for bats will be carried out prior to works being carried out. As required in Table 3-3 Biodiversity of the Framework Construction Environmental Management Plan [App-123], the Contractor will updated species surveys, including bats, great crested newt, breeding birds, otter, water vole and badger, to re-confirm the status of protected species identified, to inform mitigation requirements and support protected species licence applications, if required by Natural England.</p>
Other	
<p>No terms have been proposed as to a license agreement for the land that will be oversailed. Therefore, the interested party resolves to withhold their position on the license agreement at this time.</p>	<p>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.</p>

2.6 Non-materiality of the proposed changes and the Infrastructure Planning (Compulsory Acquisition) Regulations 2010

2.6.1 This section of this report sets out the Applicant's views on the materiality of the proposed changes and includes a statement explaining why the procedures set out in the Infrastructure Planning (Compulsory Acquisition) Regulations 2010 (CA Regulations) that relate to the inclusion of "additional land" (as defined in those regulations) do not apply to this change request.

CA Regulations

2.6.2 With one exception, all of the changes that are the subject of this request can be accommodated within the existing Order limits and do not require any greater compulsory acquisition power than those included in the application as submitted. Indeed Change 1 would seek the 'downgrading' of plots 20-16, 20-17, 20-18, 20-19 and 20-20 from compulsory acquisition (shown in pink on the Land and Crown Land Plans) to the compulsory acquisition of rights (shown in blue on the Land and Crown Land Plans).

2.6.3 That one exception is Change 3 in relation to which, as a consequence of the need to transport the larger 400kV transformers to the onsite substations it will be necessary for the beds of the Abnormal Indivisible Load vehicles to over sail private land at one location. As a consequence Change 3 includes a minor increase to the Order limits to accommodate this over sailing. The land in question is identified on the Land and Crown Land Plans included in Appendix I and labelled 21-04 and shown in green. Plot 21-04 is shown in green to denote that the Applicant seeks only the power to temporarily possess this plot during

construction and does not seek any greater power to compulsory acquire, or compulsorily acquire rights over, that land.

- 2.6.4 The Infrastructure Planning (Compulsory Acquisition) Regulations 2010 ('CA Regs'), as is explained in its accompanying Explanatory Memorandum, sets out the procedures to be followed where it is proposed to include in an order granting development consent a provision authorising the compulsory acquisition of land, which was not included in the application for the order. The Applicant considers that the CA Regs would not apply to the inclusion within its proposed development consent order of a provision that would authorise the temporary possession of plot 21-04.
- 2.6.5 Regulation 4 of the CA Regs confirms that regulations 5 to 19 of the CA Regs apply where it is proposed to include in an order granting development consent a provision authorising the compulsory acquisition of land and a person with an interest in the additional land does not consent to the inclusion of the provision.
- 2.6.6 A provision authorising the temporary possession of land is not a provision that authorises the compulsory acquisition of land, an interest in land or rights over land.
- 2.6.7 Temporary possession is fundamentally different in character from the compulsory acquisition of land, or of rights over land, because a temporary possession does not in any way affect the title to that land. A temporary possession provision temporarily dispossess the occupant of the land and suspends the exercise of any rights enjoyed over that land for the duration of the period of temporary possession. During this period the owner would remain free to deal with the title in any way it sees fit, subject to the temporary possession. Once the temporary possession ceases the land may be re-occupied and any person enjoying rights over it would be able to resume doing so. At no point would the undertaker "acquire" the land or an interest in the land or any right over it.
- 2.6.8 This distinction is maintained throughout Regulations 5 to 19 of the CA Regs which use the term "proposed provision" to refer to the provision that must be considered in accordance with the procedures set out in those regulations. Regulation 2 (Interpretation) explains that (emphasis added):
- "proposed provision" means a compulsory acquisition request in respect of additional land;*
- and:*
- "compulsory acquisition request" means a request for an order granting development consent to authorise compulsory acquisition of land or of an interest in or right over land;*
- 2.6.9 Because a temporary possession provision would not authorise the compulsory acquisition of land or of an interest in or right over land it is not a "proposed provision" and so the procedures in the CA Regulations would not apply to the Applicant's proposal to seek a power of temporary possession over plot 21-04 which it requires to over-sail to deliver Option 3, should the Examining Authority accept this changes application.

2.6.10 This approach would be consistent with the precedent set by the examination of the A14 Cambridge to Huntington Improvement Scheme Order 2016. During the course of that examination that applicant applied for a series of non-material changes which included the addition of further land within the Order limits and which variously included compulsory acquisition of land, of rights over land and of temporary possession of land. In the case of changes that required the compulsory acquisition of additional land, or rights over additional land, the Examining Authority either (i) followed the procedures in the CA Regulations or (ii) accepted the changes without having followed the procedures in the CA Regulations on the basis that all persons with interests in the land consented to the inclusion of the proposed provision in accordance with regulation 4 of the CA Regs. Consistent with the view that temporary possession is not compulsory acquisition, the Examining Authority did not require the applicant to obtain the consent of all persons with interests in the land, or follow the procedures in the CA Regs. This approach can be seen for example, in paragraph 2.3 of its procedural decision of 22 October 2015 **[PD-018]**; “The change DR1.103 does not require compulsory acquisition, as it is for temporary possession; therefore, no additional consents are required from landowners.”

Materiality of the proposed changes

2.6.11 The Applicant notes that whether or not the proposed changes are considered to be material or non-material is a matter for the Examining Authority. In bringing forward the proposed changes which are the subject of this request to make changes to the Scheme, the Applicant has given careful consideration to the question of what is, or is not a material change.

2.6.12 The Applicant appreciates that there is no specific legal or technical definition of the term "non-material". However, AN16 suggests that a non-material change may be one which does not generate new or different likely significant effects; and that the extent to which a change request involves an extension to the Order limits, particularly where this would require additional compulsory acquisition powers (e.g. for new plots of land and / or new interests in land), is a factor which may be determinative of the materiality or non-materiality of a change.

2.6.13 The Applicant, having considered the proposed changes carefully in the light of the available guidance referred to in paragraph 1.2 above, has concluded that none of the changes proposed in this report are material in nature – whether considered individually or collectively, separately or cumulatively, they do not result in any material changes to the underlying Scheme to which the Application relates.

2.6.14 The proposed changes are all relatively localised in their effect and therefore do not change the substance of the Scheme for which development consent is sought. None of the proposed changes are materially different from the corresponding elements of the Scheme which were originally proposed and consulted on prior to the submission of the Application to the Secretary of State for BEIS via the Inspectorate.

2.6.15 The proposed changes do not materially change the effects of the Scheme on the local community, given that they are localised to changes relating to areas of

existing or proposed built development, or in the case of Change 2, underground activities.

- 2.6.16 While Change 3 would lead to a minor increase to the Order limits to form new plot 21-04; the Applicant requires this land only temporarily during construction to facilitate the over-sailing of it by Abnormal Indivisible Loads. The interference with the owner's interests in this land would be transient, temporary and the land would be restored and possession of it returned to its owner and occupier once the Applicant's requirement for using the land has been met. In other areas, as a result of Change 1 which seeks to remove Option 1 from the application, the Applicant is seeking to 'downgrade' the compulsory acquisition powers sought over plots 20-16, 20-17, 20-18, 20-19 and 20-20 from compulsory acquisition of all interests to the compulsory acquisition of rights. Taken in the round the Applicant considers that the changes sought by this request would modestly reduce the compulsory acquisition powers sought by it.
- 2.6.17 In environmental terms, the Applicant has reviewed and appraised each of the proposed changes (in section 3 of this Report) in the context of the original environmental impact assessment carried out in respect of the Scheme, and none of the proposed changes have been found to result in any new or materially different likely significant environmental effects in comparison to those assessed and reported in the Environmental Statement **[APP-032 to APP-050]**. It is also noted that the changes do not change the conclusions of the Habitats Regulations Assessment **[APP-092]**, nor require a new European Protected Species licence, nor reflect an impediment to the grant of any other consent or licence required outside of the DCO process.
- 2.6.18 Accordingly, and in conclusion, the Applicant invites the Examining Authority to accept the proposed changes into the examination of the Application as non-material changes.

3 Proposed change 1: Removal of Option 1 National Grid Substation Extension

3.1 Description of the change

- 3.1.1 The Burwell Substation extension Option 1 is proposed to be removed from the Scheme, although rights through this land may still be required for underground cabling. The need for the transformer compound at this location would be removed by changing the electrical configuration of the Scheme (as set out in NMC-02 and NMC-03) or by proceeding with Option 2 for the substation extension. Figure 3-1 and 3-2 overleaf show the relevant changes.
- 3.1.2 Works will still be required to connect the Scheme to the national electricity grid at Burwell and therefore access will be required for those works and for maintenance during operations. Cable Route Access A would be relocated to the existing Burwell National Grid existing main access to facilitate the required works to connect the Scheme to the national electricity grid.
- 3.1.3 This change is shown on the 'before' and 'after' extracts of ES Figure 3-20 in Appendix J, Sheet 20 of the Land and Crown Land Plans, Works Plans and Access and Rights of Way Plans as shown in Appendix I of this report.

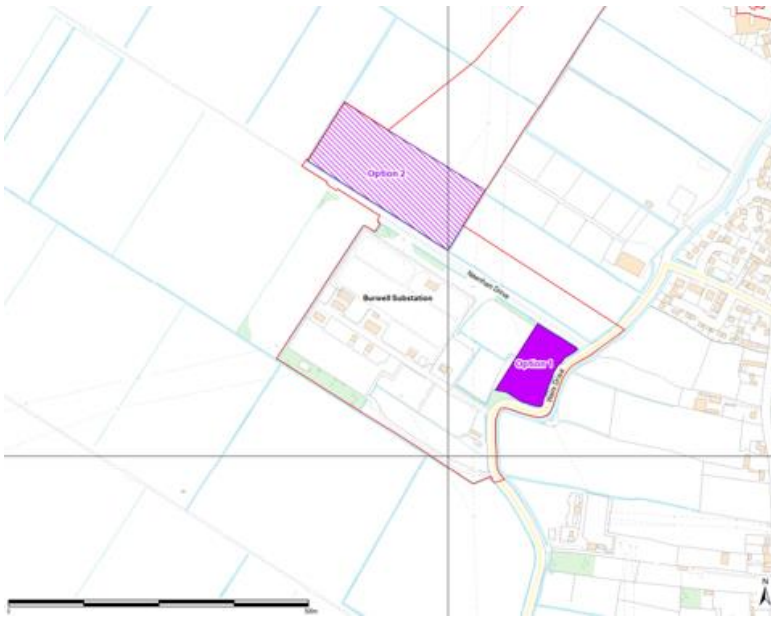


Figure 3-1: Burwell National Grid Substation Extension Options 1 and 2 (See Figure 3-20 of the Application [EN010106/APP/6.3])

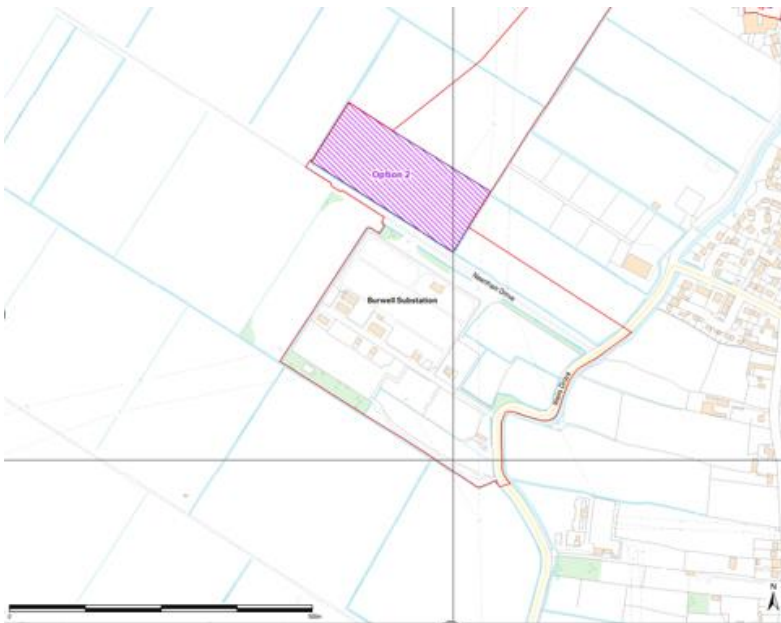


Figure 3-2: Burwell National Grid Substation Extension Option 2

3.2 Summary of environmental appraisal

- 3.2.1 The proposed changes associated with NMC-01 have been reviewed and assessed, as summarised in Table 3 1, to identify any likely significant effects that would be new or materially different from those presented in the Scheme ES [APP-036 and APP-038 to APP-048].

Table 3-1: Likely Environmental Effects of NMC-01

ES Chapter number	ES Chapter heading	Likely effect of the changes	Material change / non-material change / no change
4	Alternatives and Design Evolution	The proposed change does not affect the point of connection to the national grid, the reasons for selecting the site, or the reasons for selecting the proposed technology.	No change
6	Climate Change	<p>The proposed change will result in minor changes to GHG emissions due to varying quantities of embodied carbon in the different substation configurations. However, as these aspects are expected to only contribute to a small proportion of the GHG footprint, the proposed change will not have a material impact in the context of the overall GHG assessment.</p> <p>The proposed change will not result in any material changes to operational emissions associated with the Scheme.</p> <p>The proposed change will not result in any changes to the climate change resilience review of the Scheme.</p>	Non-material change
7	Cultural Heritage	There are no effects caused by Burwell National Grid Substation Extension Option 1. Consequently there are no changes to the cultural heritage assessment.	No change
8	Ecology and Nature Conservation	<p>The proposed removal of Burwell National Grid Substation Extension Option 1 would result in there being no need to close a main Badger sett affected by Option 1, with subsequent need for creation of an artificial sett and associated mitigation. Whilst, underground cabling may still be required through this location, the Badger sett will be avoided which will be secured through the Construction Environmental Management Plan which will be prepared during detailed design, should the Scheme gain consent, see Appendix Q for updated Framework Construction Environmental Management Plan. The removal of Option 1 would also avoid the requirement for tree removal along Weir's Drove to facilitate a new access point; however, two trees with potential to support roosting bats, although not with confirmed roosts, may be impacted to facilitate movements of Abnormal Indivisible Loads along Weirs Drove. This would avoid the majority of potential impacts to bat roosts present or potentially present, identified within the ES. These would be beneficial changes to the Scheme, but do not change the overall conclusions of the ES.</p> <p>The changes would not require updates to the Habitats Regulations Assessment documentation submitted with the Application and neither would a new EPS licence would be required as a consequence of the change.</p>	Non-material change

ES Chapter number	ES Chapter heading	Likely effect of the changes	Material change / non-material change / no change
9	Flood Risk, Drainage and Water Resources	<p>The proposed removal of Burwell National Grid Substation Extension Option 1 would result in their being no need to infill a current drain (approximately 60m in length), and avoid the need to excavate a replacement drain (approximately 60m in length) which would tie in to the existing drainage system. This is considered a beneficial change to the Scheme as this removes a construction element which interacted with the surface water drainage system. In the ES this was assessed as a very low impact on a low importance receptor, resulting in a temporary negligible effect, that is not significant. This impact will no longer occur.</p> <p>The removal of Option 1 from the assessment would result in no change to the groundwater assessment within the ES for both construction and operational phases.</p> <p>Option 1 was screened out of WFD impact assessment during the screening assessment, as it would not have resulted in any net loss of habitat, or change to WFD quality elements of the waterbody. The removal of Option 1 would therefore be a non-material change in the assessment.</p> <p>The Flood Risk Assessment [AS-007 to AS010] includes the flood risk assessment for Option 1 and Option 2 within Table 11. The flood risk assessment for Option 2 would remain the same with Option 1 being removed from the assessment. The residual risks to the Scheme are presented in Section 6, with both Option 1 and Option 2 being at potential risk from sea level risk and breaches of defences, with finished floor levels proposed to be set at 850mm above ground level to mitigate this risk.</p>	Non-material change
10	Landscape and Visual Amenity	<p>The proposed change is within the parameters assessed in Chapter 10: Landscape and Visual Amenity [APP-042] of the ES. Options 1 and 2 for the Burwell National Grid Substation Extension were assessed separately in Chapter 10 during construction, Year 1 of operation, Year 15 of operation, and decommissioning.</p> <p>The effects for Options 1 and 2 were similar. A slightly higher magnitude of impact was reported for Option 1 during construction and operation due to the greater extent of vegetation removal required for Option 1 and the small-scale field and vegetation pattern at the Option 1 site.</p> <p>One more significant visual effect was reported due to the presence of Option 1 compared with Option 2, relating to users of Weir Drove Road during both construction and Year 1 of operation. As Option 1 is omitted from the Scheme, these effects would not occur. This is a beneficial change but does not change the overall conclusions of the ES.</p>	Non-material change
11	Noise and Vibration	<p>Complaints have been received about tonal noise from the Burwell National Grid Substation and there was concern about how tonal noise emissions may change in future as a result of an expansion. Option 1 was assessed in Chapter 11: Noise and Vibration [APP-043] as it is located</p>	No change

ES Chapter number	ES Chapter heading	Likely effect of the changes	Material change / non-material change / no change
		closest to sensitive receptors and was considered equivalent to a worst-case. Removal of Option 1 would reduce the noise impact at nearby sensitive receptors and noise from the Burwell National Grid Substation would be equivalent to the baseline scenario. This is a beneficial change for some receptors but does not change the overall conclusions of the ES.	
12	Socio-Economics and Land Use	The removal of Option 1 from the application would not result in a change for the Chapter 12: Socio-Economics and Land Use [APP-044] of the ES. Both Option 1 and Option 2 were assessed in the chapter and each option was not anticipated to make a difference on the socio-economic impact of the Scheme. Removal of Option 1 would not affect the assessment made in the chapter.	No change
13	Transport and Access	No changes in the number of HGVs or staff forecasts presented in Chapter 13: Transport and Access [APP-045] of the ES are anticipated as a result of removal of Option 1 National Grid Substation Extension as Option 2 still forms part of the Scheme. In addition, as Option 2 currently remains within the Scheme, there are no changes in the numbers or routing of Abnormal Indivisible Loads using the local road network as a result of the removal of Option 1. Cable Route Access A would be relocated approximately 50m to the west, to the existing Burwell National Grid existing main access. This change is to facilitate access to the works required to connect the Scheme to the national electricity grid. This would avoid the requirement to create the new site access that was proposed into the Option 1 site area off Weirs Drove as well as the proposed temporary traffic signals. On this basis, the finding of Chapter 13 Transport and Access [APP-045] of the ES remains the worst-case scenario and the conclusions do not change.	No change
14	Air Quality	There are no effects caused by Burwell National Grid Substation Extension Option 1 during construction and decommissioning. Consequently, there are no changes to the air quality assessment as a result of its removal.	No change
15	Human Health	The removal of Option 1 from the assessment would not result in any material change to the findings of Chapter 15: Human Health [APP-047] of the ES. Option 1 was considered the worst-case scenario based on its closer proximity to sensitive receptors as determined by the chapters that informed the Human Health chapter, namely Air Quality, Noise and Vibration, Landscape and Visual and Traffic and Transport. The removal of Option 1 would reduce noise impacts on the closest residential properties concluded in Chapter 11: Noise and Vibration [APP-043] , with the other chapters recording No Change or a Non-material change in relation to NMC-01. When taking their findings into account, the overall Human Health assessment conclusion would not materially change.	Non-material change

ES Chapter number	ES Chapter heading	Likely effect of the changes	Material change / non-material change / no change
16	Other Environmental Topics	<p>There are no effects associated with Burwell National Grid Substation Extension Option 1 resulting from Glint and Glare, Ground Conditions, and Telecommunications, Television Reception and Utilities during construction, operation or decommissioning. Consequently there are no changes to the assessment of these topics.</p> <p>In terms of Waste, with the retention of Option 2 in the Scheme at this stage, the volumes of waste and associated management and disposal would remain unchanged with the removal of Option 1. Similarly, there would be no change to the Major Accidents and Disasters assessment, with the retention of Option 2 in the Scheme at this stage.</p>	No change

3.3 Schedule of engagement with relevant affect person/interested parties in relation to the proposed change

3.3.1 The proposed changes associated with NMC-01 have been reviewed and the following parties have been identified as having an interest in the land affected. The plots listed in Table 3-2 form the area at the Burwell National Grid Main Substation which had been allocated for the Sunnica Grid Connection. If Change 1 is to be accepted the plots listed would only be required for the acquisition of rights, rather than the acquisition of all interests and rights. This change can be seen in Appendix I. All interested and/or affected parties were consulted on all three proposed changes.

Table 3-2: NMC-01 Schedule of Engagement

Party Name	Plots in the vicinity of NMC-01	Book of Reference Category	Affected / Interested Party
National Grid Electricity Transmission plc	20-16, 20-17, 20-18, 20-19, 20-20	1	Interested Party
Eastern Power Networks plc	20-17, 20-18, 20-19, 20-20	1	Affected Party
Graham David Reeve	20-17, 20-18, 20-20	1	Interested Party
Swaffham Internal Drainage Board	20-19	2	Affected Party

3.4 Schedule of consequential amendments to DCO application documents

Table 3-3: NMC-01 Schedule of consequential amendments to application documents

Application document reference	PINS document reference	Application document name and (where relevant) sheet number	Current Version	Report Appendix where Changes Shown	Summary of Changes
EN010106/APP/4.3	APP-024	Book of Reference (parts 1 to 5)	00	Appendix D	The Description of Land has been amended to reflect the change in acquisition type from compulsory acquisition to the acquisition of rights in relation to plots 20-16, 20-17, 20-18, 20-19 and 20-20.
EN010106/APP/6.1	APP-035	Scheme Description	00	Appendix E	Chapter 3: Scheme Description has been amended to incorporate the proposed design changes.
EN010106/APP/7.3	APP-264	Design and Access Statement	00	Appendix F	Design and Access Statement has been amended to incorporate the proposed design changes.
EN010106/APP/3.1	APP-019	Draft Development Consent Order – article 18	00	Appendix G	Article 18 has been amended to remove reference to Work No. 5A and the mechanism for ensuring that the applicant exercises compulsory acquisition powers in relation to either Option 1 <i>or</i> Option 2 has been amended to instead require either Option 2 <i>or</i> Option 3.
EN010106/APP/3.1	APP-019	Draft Development Consent Order – Schedule 1	00	Appendix G	Work No. 5A and related references have been removed.
EN010106/APP/3.1	APP-019	Draft Development Consent Order – Schedule 2	00	Appendix G	Requirement 23 has been amended to reflect the undertaker notifying the relevant planning authority of its choice to implement either Option 2 <i>or</i> Option 3, instead of Option 1 <i>or</i> Option2.

Application document reference	PINS document reference	Application document name and (where relevant) sheet number	Current Version	Report Appendix where Changes Shown	Summary of Changes
EN010106/APP/3.1	APP-019	Draft Development Consent Order – Schedule 8	00	Appendix G	Plots 20-16, 20-17, 20-18, 20-19 and 20-20 have been added to this Schedule to reflect the change in powers sought from compulsory acquisition to the compulsory acquisition of rights.
EN010106/APP/3.1	APP-019	Draft Development Consent Order – Schedule 14	00	Appendix G	Part 4 – Temporary Traffic Signals of Schedule 14 has been amended to remove TS1 which was required to manage traffic at the site access to the Option 1 substation during construction. Temporary traffic regulation measures are not required in relation to the re-located access that it still required in this area (see Access and Rights of Way below).
EN010106/APP/3.2	APP-020	Explanatory Memorandum	00	Appendix H	The explanations of the relevant provisions of the draft DCO have been amended to reflect the changes.
EN010106/APP/2.2	AS-004	Works Plans (Sheet 20)	01	Appendix I	Sheet 20 has been amended to remove Work No. 5A.
EN010106/APP/2.1	AS-003	Land and Crown Land Plans Sheet 20	01	Appendix I	Sheet 20 has been amended to reflect the change in acquisition type from compulsory acquisition to the acquisition of rights in relation to plots 20-16, 20-17, 20-18, 20-19 and 20-20.
EN010106/APP/2.2	AS-004	Access and Rights of Way Plans (Sheet 20)	01	Appendix I	Access off Weirs Drove (CR-A1 to CR-A2) has been relocated approximately 50m to the west to the existing Burwell National Grid Substation's existing access. No amendments to the wording of the corresponding entry in Part 1 of Schedule 7

Application document reference	PINS document reference	Application document name and (where relevant) sheet number	Current Version	Report Appendix where Changes Shown	Summary of Changes
					to the draft DCO is required to facilitate this change.
EN010106/APP/2.4	APP-012	Traffic Regulation Measures Plans - Temporary Measures (Sheet 1)	00	Appendix I	Traffic management measures have been removed from Sheet 1 of the TRM plans, as those measures are not required at the amended access location..
EN010106/APP/2.4	AS-006	Location Plan (Sheet1)	00	Appendix I	Figure 2.1 reflects the removal of Option 1 Burwell National Grid Substation Extension.
EN010106/APP/6.3	APP-161	Figure 3-20 - Option 2 Burwell National Grid Substation Extension	00	Appendix J	Figure 3-20 reflects the removal of Option 1 Burwell National Grid Substation Extension.
EN010106/APP/6.3	APP-168	Figure 3-25a to d Cable Route Access Points	00	Appendix J	Access off Weirs Drove (CR-A1 to CR-A2) has been relocated approximately 50m to the west to the existing Burwell National Grid Substation's existing access.
EN010106/APP/4.1	APP-022	Statement of Reasons	00	Appendix K	Amendments have been made to reflect the changes to works descriptions (including works numbers) following the removal of Substation extension Option 1..
EN010106/APP/4.4	APP-025	Schedule of Negotiations and Powers Sought	00	Appendix L	Has been amended to reflect the change in acquisition type from compulsory acquisition to the compulsory acquisition of rights in relation to plots 20-16, 20-17, 20-18, 20-19 and 20-20, the deletion of Work No. 5A. ..
EN010106/APP/6.2	APP-123	Appendix 16C: Framework Construction Environmental Management Plan	00	Appendix Q	Updated to remove the requirement for specific mitigation measures associated with the Burwell National Grid Substation Extension Option 1.

4 Proposed change 2: Option 3 400kV cabling within Grid Connection Routes A and B

4.1 Description of the change

- 4.1.1 Option 3 would require that the electrical configuration for the main import and export electrical cables that run within Grid Connection Route A and Grid Connection Route B be suitable for 400kV transmission as opposed to the 132kV cables that would be required for Options 1 and 2. This would mean that only a single set of cables will require a trench, jointing bays, horizontal directional drills as opposed to four, had the cables run at 132kV. This change is within the parameters (such as trench width and depth, working width, location of jointing bays etc. Refer to Chapter 3: Scheme Description **[EN010106/APP/6.1]** for further information) assessed in the ES submitted as part of the DCO application. The construction programme for the Grid Connection Routes A and B will be extended slightly to 50 weeks, from the current proposed 30 weeks; however, this is still within the 24 month worst case construction programme assessed within the ES.
- 4.1.2 Before and after images of the 132kV and 400kV cross sections, illustrating this change, are presented below. The Application figure reference is provided below for information.

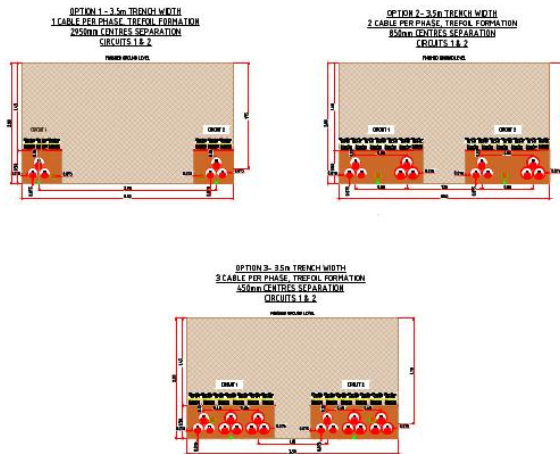


Figure 4-1: 132kV Cable Route Cross Section (See Figure 3-7b of the Application [EN010106/APP/6.3])

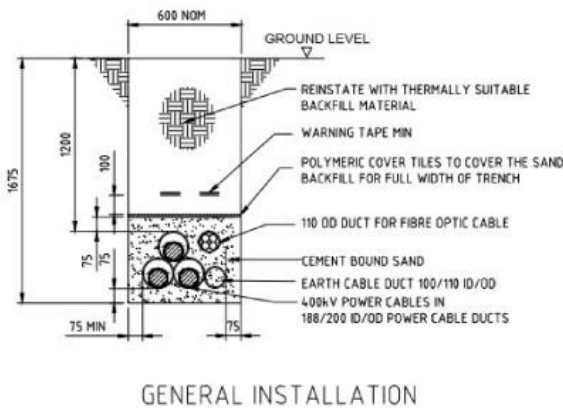


Figure 4-2: 400kV Cable Route Cross Section

4.2 Summary of environmental appraisal

- 4.2.1 The proposed changes associated with NMC-02 have been reviewed and assessed, as summarised in Table 4-1, to identify any likely significant effects that would be new or materially different from those presented in the Scheme ES [APP-036 and APP-038 to APP-048].

Table 4-1: Likely Environmental Effects of NMC-02

ES Chapter number	ES Chapter heading	Likely effect of the changes	Material change / non-material change / no change
4	Alternatives and Design Evolution	<p>The proposed change does not affect the start or end points of the Grid Connection Route. The change from a requirement for four sets of cables to only one set cables has the potential to affect some of the considerations of the high level cable route evaluation that was undertaken prior to EIA scoping and is summarised by Table 4-4 of Chapter 4: Alternatives and Design Evolution of the ES [APP-036]. NMC-02 would reduce the number of jointing bays needed and result in these being smaller. Table 4-4 of Chapter 4: Alternatives and Design Evolution of the ES [APP-036] concludes that it is uncertain whether sufficient space for jointing bays and pits within Cable route 2 and Cable route 3 would be available. It is not considered that NMC-02 would change this conclusion. The change would not affect the concern over the need to cross Network Rail land at a level crossing or bridge, which is associated with Cable routes 2 and 3, respectively. Overall, Cable route 1 would remain the preferred option from a technical and engineering point of view, taking account of NMC-02.</p> <p>The outcome of consideration of the 'Planning and environmental constraints' and 'Land use and ownership constraints' themes of Table 4-4 would not be affected since the three Cable route options remain on the same alignment, and would therefore cross the same designations, land uses and land ownerships. Cable route 1 would remain the preferred option.</p>	No change
6	Climate Change	<p>The proposed change will result in minor changes to GHG emissions associated with the embodied carbon in the different cabling, as well as the different construction activities associated with the change (e.g. trenching requirements). However, as these aspects only contribute to a small proportion of the GHG footprint, the proposed change will not have a material impact in the context of the overall GHG assessment.</p> <p>The proposed change will not result in any material changes to operational emissions associated with the Scheme.</p> <p>The proposed change will not result in any changes to the climate change resilience review of the Scheme.</p>	Non-material change
7	Cultural Heritage	<p>As only a single set of cables will be required, there may be a reduction in the impacts on individual archaeological features. However, as the exact location of the cables within the corridor continues to be not certain no change to the assessment is predicted at this stage.</p>	No change
8	Ecology and Nature Conservation	<p>The current non-intrusive cabling methodology allows for cables to be installed in lengths in excess of 200m. However, during the technical review of NMC-02 it has been established that it</p>	Non-material change

ES Chapter number	ES Chapter heading	Likely effect of the changes	Material change / non-material change / no change
		<p>is not technically feasible for 400kV cables to be installed beyond 200m via non-intrusive methods. As a result, the assessed position of a single non-intrusive crossing under watercourses W18, W19 and W20 (see ES Figure 3-23 [APP-166]), is no longer possible. However, shorter lengths of non-intrusive crossings will be undertaken and each watercourse (i.e. W18, W19 and W20) will be crossed separately. This would require temporary steel structure overbridges for access purposes, and the use of shorter lengths of non-intrusive cable crossings. W18 supports Water Vole populations with burrows being recorded as present. Water Vole are protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended), so any structures or works in or around the watercourse will need to avoid disturbance to Water Vole. As set out in Chapter 8: Ecology and Nature Conservation [APP-040] of the ES, the Water Vole population present within the Order limits is of District Importance.</p> <p>The temporary metal bridges will be located in suitable locations, avoiding Water Vole burrows and where there will be minimal impact to the channel. They would be of a clear span design, and reinstatement would take place following removal of the temporary bridges. The works would be carried out according to good industry practice methods, with a Water Vole mitigation strategy (including an appropriate licence, if required) in place and supervised by an Ecological Clerk of Works throughout. Measures are identified within the Framework CEMP in Appendix 16C [EN010106/APP/6.2] to the ES document and would apply to such works. The impact will be temporary during construction and restricted to a specific section of the watercourses affected minimising overall disturbance. The effect is then considered of low magnitude, resulting in a temporary minor adverse effect, that is not considered significant.</p> <p>The changes would not require updates to the Habitats Regulations Assessment documentation submitted with the Application and neither would a new EPS licence would be required as a consequence of the change.</p>	
9	Flood Risk, Drainage and Water Resources	<p>The current non-intrusive cabling methodology allows for cables to be installed at distances in excess of 200m. However, during the technical review of NMC-02 it has been established that it is not technically feasible for 400kV cables to be installed beyond 200m via non-intrusive methods. Therefore, a single non-intrusive cable crossing of the IDB drains W18, W19, and W20 would no longer be possible (see ES Figure 3-23 [APP-166]). However, shorter lengths of non-intrusive crossings will be undertaken and each watercourse (i.e. W18, W19 and W20) will be crossed separately. This would require temporary steel structure overbridges for access purposes, and the use of shorter lengths of non-intrusive cable crossings. The temporary metal bridges would be located in suitable locations where there will be minimal impact to the channel, of a clear span design, and reinstatement would take place following removal of the temporary</p>	Non-material change

ES Chapter number	ES Chapter heading	Likely effect of the changes	Material change / non-material change / no change
		<p>bridges. The works would be carried out according to good industry practice methods, and measures identified within the Framework CEMP in Appendix 16C [EN010106/APP/6.2] to the ES document.</p> <p>In relation to the WFD assessment, the crossings of W18, W19, and W20 are currently listed as non-intrusive crossings. This would remain the same although some reinstatement works to the top of the banks and riparian margins where temporary crossings are required will be necessary. However, this should not lead to any long term or significant adverse impacts. Therefore, the amendments of the WFD assessment would be non-material. Reinstatement works for these temporary crossings can be included and defined as part of the WFD Mitigation and Enhancement Strategy that is already proposed for other intrusive crossings and secured through the Framework CEMP [EN010106/APP/6.2].</p> <p>This change will not result in a change to the groundwater assessment. There will need to be additional launch and receiving pits constructed for the shorter HDD crossings of W18-21, but the level of impact will be consistent with the existing groundwater assessment.</p> <p>This change will not result in a change to the flood risk assessment, or the management of flood risks during the construction phase as these are controlled by measures outlined in the Framework CEMP [EN010106/APP/6.2].</p>	
10	Landscape and Visual Amenity	<p>The proposed change is within the parameters as assessed in Chapter 10: Landscape and Visual Amenity [APP-042] of the ES. The assessment assumed a worst-case scenario where excavation for Grid Connection Routes A and B could be anywhere within the Order limits within the limits of deviation for those works and would extend throughout the construction period. The assessment considered the single non-intrusive crossing below watercourse W18, W19 and W20, although it is likely that the individual crossings (as identified in the ecology and water environment sections above) will require machinery to be in the area for a longer period, this is not anticipated to change the results of the assessment. All works along the cable routes will still be within the limits outlined within the ES and will not be altered by the proposed change. Therefore, the change to 400kV cabling will not have any implications in terms of the effects on landscape and visual amenity reported in the ES for construction, operation or decommissioning. On this basis, the findings of Chapter 10: Landscape and Visual Amenity [APP-042] remain as reported.</p>	No change
11	Noise and Vibration	<p>The noise impact resulting from underground cables would be a result of excavation and laying, and non-intrusive methods, including the additional crossings of W18, W19 and W20. It is anticipated that the noise generated from these activities will be unchanged and noise and</p>	No change

ES Chapter number	ES Chapter heading	Likely effect of the changes	Material change / non-material change / no change
		<p>vibration effects from works to lay underground cables will be as reported in Chapter 11: Noise and Vibration [APP-043] of the ES. The construction programme for the Cable Route has been reviewed as part of the engineering design and is expected to be carried out over longer periods (up to 50 weeks rather than 30 weeks) than assumed in the ES as a result of the additional complexity associated with a 400kV connection and its associated infrastructure. As outlined below in the Transport and Access section, the number of HGV and staff vehicle movements are not anticipated to change, and similarly the construction methods are not changing from those assessed within the ES. Although, the noise and vibration effects would be extended in duration they would be expected to be lower in magnitude from construction traffic as it would involve less traffic movements over a longer period. Therefore the conclusions of the construction traffic impact assessment would therefore remain valid and represent the worst-case situation, while the noise and vibration from onsite activities would remain as assessed in the ES.</p>	
12	Socio-Economics and Land Use	<p>The proposed change from 132kV to 400kV cables would not have an impact on Chapter 12: Socio-Economics and Land Use [APP-044] of the ES. The specification would not change the impact experienced by the receptors considered in the chapter.</p>	No change
13	Transport and Access	<p>No changes to the number of HGVs or staff presented in Chapter 13: Transport and Access [APP-045] of the ES are forecast as a result of NMC-02.</p> <p>The forecast construction programme for the Cable Route has been based on a worst-case scenario which represents a shorter expected construction period to forecast the peak number of daily HGVs and staff required. The construction programme for the Cable Route has been reviewed as part of the engineering design and is expected to be carried out over longer periods (up to 50 weeks rather than 30 weeks) than assumed in the ES as a result of the additional complexity associated with a 400kV connection and its associated infrastructure. Therefore, the forecast daily construction HGVs and staff presented in the ES represent a worst-case scenario as it compresses the construction phase and therefore yields a higher number of daily and peak hour trip movements offsite and a greater number of plant onsite at any one time.</p> <p>Notwithstanding this, as a result of a longer assumed construction programme for these works, the daily number of HGVs and staff on the local highway network are expected to be fewer than that assessed in the ES which reduces the forecast impact presented in the ES.</p> <p>The cable is most likely to be left <i>in situ</i> on decommissioning and therefore, no effects are anticipated during this stage along the cable route.</p>	Non-material change

ES Chapter number	ES Chapter heading	Likely effect of the changes	Material change / non-material change / no change
		On this basis, the finding of Chapter 13: Transport and Access [APP-045] of the ES remains the worst-case scenario with non-material change as a result of the distribution of HGVs during the construction phase.	
14	Air Quality	The construction and decommissioning methodology will be similar to that as outlined in Chapter 3: Scheme Description [EN010106/APP/6.1] of the ES, therefore, there is not expected to be a change in the fugitive emissions of particulate matter or non-road mobile machinery emissions (NRMM), as a result of NMC-02. As described in the Transport and Access section above, the construction programme is expected to be carried out over longer periods (up to 50 weeks rather than 30 weeks) than assumed in the ES. Therefore, the forecast daily construction HGVs and staff presented in the ES represent a worst-case scenario as it compresses the construction phase and therefore yields a higher number of daily and peak hour trip movements offsite and a greater number of plant onsite at any one time consequently, the construction road traffic emissions assessment in the ES are a worst case and will not change.	No change.
15	Human Health	The proposed change in cable type will not influence any outcomes of the Scheme experienced by Human Health receptors. Therefore, the findings of Chapter 15: Human Health [APP-047] of the ES remain valid and unchanged.	No change.
16	Other Environmental Topics	<p>The proposed change is within the parameters as assessed in Chapter 16: Other Environmental Topics [APP-048] of the ES. Therefore, there are no changes to the assessment of Glint and Glare, Ground Conditions, Telecommunications, Television Reception and Utilities during construction, operation or decommissioning.</p> <p>In terms of Waste, the change may result in smaller jointing bays across Grid Connection Routes A and B which would result in a minor reduction in the amount of excavated material requiring disposal; however, soil is proposed to be re-used on site and therefore, there will be no change to the volume of waste requiring off-site disposal during construction. During operation and decommissioning there is no waste associated with the Grid Connection Routes A and B.</p> <p>As NMC-02 will be within the parameters as assessed with the ES, there is no change to Major Accidents and Disasters assessment.</p> <p>In terms of Electromagnetic Field (EMF) within 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.</p>	No change

4.3 Schedule of engagement with relevant affect person/interested parties in relation to the proposed change

4.3.1 The proposed changes associated with NMC-02 have been reviewed and the following affected parties have been identified as having an interest in the land affected. The plots listed in Table 4-2 were determined to be affected by this change as they are defined within the Schedule of Negotiations (Ref: EN010106/APP/4.4) as forming part of Grid Connection Routes A and B and/or listed as Work No. 4 in the Works Plans (Ref: EN010106/APP/2.2). The plots identified are all subject to the installation of a 132kV specification cable as per the original DCO application. All interested and/or affected parties were consulted on all three proposed changes.

Table 4-2: NMC-02 Schedule of Engagement

Party Name	Plots in the vicinity of NMC-02	Book of Reference Category	Affected / Interested Party
A.G. Wright & Son (Farms) Limited	8-03, 8-04, 8-05, 8-06, 9-01	1	Interested Party
Adrian John Barnett	18-12, 18-16	1 and 2	Affected Party
AFP Assets Limited	4-05, 5-01	2	Affected Party
Airwave Solutions Limited	9-06	1	Affected Party
Anglian Water Services Limited	1-01, 12-02, 14-03, 14-08, 15-02, 16-04, 16-05, 16-11, 16-13, 18-02, 18-04, 18-05, 18-11, 18-12, 18-17, 19-12, 19-13, 19-14, 5-02	1 and 2	Affected Party
Arat Investments Limited	13-02, 14-01, 14-02, 14-03, 14-07, 15-01	2	Affected Party
Austin Mcalonan	19-13, 19-14	1	Affected Party
B C Mitchams Farms (Burwell) Limited	17-03, 18-01	2	Interested party
Barclays Bank plc	4-05, 5-01	2	Affected Party

Party Name	Plots in the vicinity of NMC-02	Book of Reference Category	Affected / Interested Party
Barclays Security Trustee Limited	10-29, 10-33, 11-01, 15-11, 18-08, 9-02, 9-06	2	Affected Party
BT Group plc	1-01, 10-30, 10-31, 16-04, 16-05, 16-06, 16-11, 16-13, 18-02, 18-11, 18-12, 18-16, 19-13, 19-14, 20-07, 20-13, 20-28, 4-03, 9-04	2	Affected Party
Burwell 11 Solar Limited	17-03, 18-01	2	Affected Party
C H Tompsett Farms	16-09, 16-10, 16-12	1	Affected Party
Cadent Gas Limited	5-03, 7-05, 16-05, 16-07, 16-10, 16-11, 16-13, 17-03, 18-03, 18-04, 18-05, 18-06, 18-07, 18-08	2	Interested Party
Cambridgeshire County Council	11-02, 11-03, 11-05, 14-08, 15-02, 15-03, 16-10, 16-11, 16-13, 16-15, 16-16, 16-17, 16-18, 18-02, 18-03, 18-04, 18-05, 18-06, 18-07, 18-11, 18-12, 18-15, 18-16, 18-18, 19-12, 19-13, 19-14, 19-15, 20-01, 20-03, 20-12, 20-13, 8-06, 9-04	1 and 2	Interest Party
Cambridgeshire Fish Preservation & Angling Society	20-02, 20-03	2	Affected Party
Cara Rohays Stoney	15-12, 16-01, 16-02, 16-03	1	Affected Party
Charlotte Caroline Tilbrook	10-33, 11-01, 11-02, 11-03, 11-05, 9-04, 9-06	1	Affected Party
Church Commissioners for England	19-15, 20-01, 20-10, 20-11, 20-14	2	Affected Party
CityFibre Limited	16-17	2	Affected Party

Party Name	Plots in the vicinity of NMC-02	Book of Reference Category	Affected / Interested Party
Clive Alfred Badcock	18-15, 19-15, 20-01, 20-02	1	Affected Party
Collmart Growers Limited	1-01, 4-01	1	Affected Party
Daniel Turner	14-02, 14-03, 14-07, 15-01, 15-11	1	Affected Party
David Charles Drain	8-02, 8-03	1	Affected Party
David Norman Chastel De Boinville	11-02, 11-03, 11-05, 11-07, 11-08, 12-02, 13-02, 14-01, 14-02, 14-03, 14-07, 14-08, 14-09, 15-01, 15-02, 15-03, 15-04, 15-05, 15-11, 15-12, 16-01, 16-02	1 and 2	Affected Party
David William Barclay	11-02, 11-03, 11-05, 11-07, 11-08, 12-02, 13-02, 14-01, 14-02, 14-03, 14-07, 14-08, 14-09, 15-01, 15-02, 15-03, 15-04, 15-05, 15-11, 15-12, 16-01, 16-02	1 and 2	Affected Party
Derek Harrington	19-05	1	Affected Party
Donald Seymour Tuke	4-03, 4-05, 5-01, 5-02	1	Affected Party
Doreen Pettit	17-03, 18-01	2	Affected Party
East Cambridgeshire District Council	18-16	2	Interested Party
Eastern Power Networks plc	1-01, 4-01, 7-03, 7-08, 10-33, 11-01, 11-08, 12-02, 13-02, 16-14, 16-15, 16-16, 16-19, 17-03, 18-01, 18-02, 18-07, 18-11, 18-12, 18-16, 18-18, 19-01, 19-02, 19-03, 19-11, 19-13, 19-14, 19-15, 20-01, 20-02, 20-03, 20-04, 20-06, 20-08, 20-09, 20-10, 20-11,	2	Affected party

Party Name	Plots in the vicinity of NMC-02	Book of Reference Category	Affected / Interested Party
	20-12, 20-13, 20-14, 20-17, 20-18, 20-19, 20-20, 20-22, 20-23, 20-26, 20-27, 20-28, 20-29, 20-30, 4-03, 4-05, 8-02, 8-03, 9-06		
EFG Corporate Services Limited	7-06	1	Affected Party
EFG Nominees Limited	7-05, 7-06	1	Affected Party
EFG Trust Company Limited	7-05, 7-06	1	Affected Party
Elisabeth Adrienne Sidebottom	16-04, 16-06	2	Affected Party
Elizabeth Mary Garget	8-02, 8-03	1	Interested Party
Energis Communications Limited	20-10, 20-11, 20-14	2	Affected Party
Environment Agency	1-01, 12-02, 15-12, 16-02, 16-03, 17-01, 17-02, 18-12, 18-14, 18-17, 20-02, 20-03, 8-03	1	Interested Party
Exning Estate Company	16-19, 16-20, 17-01, 17-02	2	Affected Party
F Sidebottom	16-09, 16-12	1	Interested Party
Fay Carol Whitehouse	19-10, 19-13, 19-14	1	Affected Party
Frimstone Limited	7-04, 7-05	1	Affected Party
Garry Peter Chapman	18-09, 18-11, 18-12, 18-13, 18-14	1 and 2	Affected Party
Geoffrey Charles James	18-14, 18-15, 18-16	1	Affected Party
George David Gibson	16-18, 16-19, 16-20, 17-01, 17-02	1	Interested Party

Party Name	Plots in the vicinity of NMC-02	Book of Reference Category	Affected / Interested Party
Gerald Keith Harrington	19-04, 19-05, 19-06	1	Affected Party
Graham David Reeve	20-09, 20-10, 20-11, 20-12, 20-13, 20-14, 20-17, 20-18, 20-19, 20-20, 20-22, 20-23, 20-24, 20-26, 20-27, 20-28, 20-29	1	Interested Party
GTC Pipelines Limited	7-06	2	Affected Party
Hannah Murphy	9-02	1	Interested Party
Harry Sidebottom	16-04, 16-06, 16-08, 16-09, 16-10, 16-11, 16-12, 16-13	1 and 2	Interested Party
Heather Kelly Tilbrook	10-33, 11-01, 11-02, 11-03, 11-05, 9-04, 9-06	1	Interested Party
Henry John Hurrell	20-13	1	Affected Party
HPUT A Limited	16-03, 16-04, 16-05, 16-06, 16-07	1	Interested Party
HPUT B Limited	16-03, 16-04, 16-05, 16-06, 16-07	1	Interested Party
Hugo Edward Upton	5-03, 5-06, 5-07, 5-08, 7-01, 7-02, 7-05, 7-06	1 and 2	Interested Party
Huw Norman Neal	19-08, 19-09, 19-10	1	Interested Party
I K Garget	8-02	2	Interested Party
Interoute Communications Limited	10-29	2	Affected Party
J F Barnard	20-02, 20-03	2	Affected Party
Jacqueline Ruth Reeve	20-09, 20-10, 20-11, 20-12, 20-13, 20-14	1	Affected Party

Party Name	Plots in the vicinity of NMC-02	Book of Reference Category	Affected / Interested Party
James Edward Waters	1-01, 4-01, 4-03	1	Affected Party
James Samuel Ford Mortlock	5-02, 5-03, 5-06, 5-07, 5-08, 7-01, 7-02	1	Affected Party
James Waters Property and Investments Limited	1-01, 4-01	2	Affected Party
Janet Vivian Barnett	18-12, 18-16	1 and 2	Affected Party
Janette Mitcham	18-16	2	Affected Party
Joanna Reeks	10-29, 10-33, 11-01, 11-02, 11-03, 11-05, 9-04, 9-06	1	Interested Party
John Brown	20-06, 20-07, 20-08, 20-09	1	Affected Party
John James	7-06, 7-07	1	Interested Party
Jonathan Earl	18-16, 19-07	1 and 2	Affected Party
Jonathan Robert Waters	1-01, 4-01	1	Affected Party
Joseph John Alfred Magri	12-02	2	Affected Party
Joyce Bertha Badcock	18-15, 19-15, 20-01, 20-02	1	Affected Party
June Swauger	18-16, 19-06, 19-07, 19-08, 19-10	1	Affected Party
Kathleen Ann Mcalonan	19-13, 19-14	1	Affected Party
Kathryn Jane James	7-06, 7-07	1	Affected Party
Kevin Andrew Badcock	18-15, 18-16, 18-19, 19-01, 19-11, 19-15, 20-01, 20-02	1 and 2	Affected Party

Party Name	Plots in the vicinity of NMC-02	Book of Reference Category	Affected / Interested Party
Kevin Neil Arrowsmith	12-02	2	Affected Party
LGC Bioresearch Limited	16-04, 16-05, 16-06	2	Affected Party
LGC Limited	16-04, 16-05, 16-06	2	Affected Party
Lightsource SPV 115 Limited	18-16, 19-12, 20-08, 20-09, 20-10, 20-11, 20-13, 20-14	2	Affected Party
Lloyds Bank plc	1-01, 4-01, 5-03, 5-07, 5-08, 7-01	2	Affected Party
Lonsdale Pension Trustees Limited	18-16, 18-17, 18-18, 19-02, 19-03, 19-04	1	Interested Party
Louise Andreasen	8-02	1	Interested Party
Margaret Ann Neal	19-08, 19-09, 19-10	1	Interested Party
Margaret Mary James	18-16	2	Affected Party
Matthew James Mitcham	18-09, 18-10, 18-11	1	Interested Party
Maureen Earl	18-16, 19-06, 19-07, 19-08, 19-10	1	Affected Party
Mavis Dove	18-16, 19-06, 19-07, 19-08, 19-10	1	Affected Party
Michael Darnell	18-16	2	Affected Party
Michael Robert Mitcham	17-03, 18-01, 18-02, 18-16, 18-17, 18-18, 19-02, 19-03, 19-04	1	Affected Party
Michael Robert Palmer	18-08	1	Interested Party
Mills & Reeve Trust Corporation Limited	11-02, 11-03, 11-05, 11-07, 11-08, 12-02, 13-02, 14-01, 14-02, 14-03, 14-07, 14-08, 14-09, 15-01,	1 and 2	Affected Party

Party Name	Plots in the vicinity of NMC-02	Book of Reference Category	Affected / Interested Party
	15-02, 15-03, 15-04, 15-05, 15-11, 15-12, 16-01, 16-02		
Mitchams Contracts (Burwell) Limited	16-11, 16-13, 16-14	1	Interested Party
Moulton Manor Farm	5-05, 7-03, 7-04, 7-06, 7-07, 7-08, 8-01, 11-07, 11-08, 12-02, 13-02, 14-01, 14-02, 14-09, 15-03, 15-04, 15-05, 15-11, 15-12, 16-01, 16-02, 4-05, 5-01, 8-02, 8-03	1 and 2	Affected Party
National Grid Electricity Transmission plc	20-08, 20-09, 20-10, 20-11, 20-12, 20-13, 20-14, 20-16, 20-17, 20-18, 20-19, 20-20, 20-22, 20-23, 20-24, 20-25, 20-26, 20-27, 20-28, 20-29, 20-30	2	Interested Party
National Grid Gas plc	7-03, 7-05, 7-06, 7-07, 16-04, 16-06, 16-09, 16-11, 16-12, 16-13, 16-14, 16-15, 16-16	2	Interested Party
National Highways Limited	7-06, 10-30, 10-31, 10-32	1	Affected Party
Network Rail Limited	4-01, 16-17, 16-19, 16-20, 17-01, 17-02, 4-05	1	Interested Party
Newbury Pigs Limited	1-01, 4-01	1	Affected Party
Newmarket A & A Plant Hire Limited	20-02	1	Affected Party
Openreach Limited	1-01, 10-30, 10-31, 16-04, 16-05, 16-06, 16-11, 16-13, 18-02, 18-11, 18-12, 18-16, 19-13, 19-14, 20-07, 20-13, 20-28, 4-03, 9-04	2	Affected Party
Paul Brown	20-04, 20-05, 20-06, 20-07, 20-08, 20-09	1	Affected Party

Party Name	Plots in the vicinity of NMC-02	Book of Reference Category	Affected / Interested Party
Paul Steve Falco	7-06	1	Affected Party
Personal Representative of Alfred Oliver Badcock, deceased	18-15, 18-16, 18-19, 19-01, 19-02, 19-10, 19-11, 19-13, 19-15, 20-01, 20-02	1 and 2	Affected Party
Priscilla Mary Mcdonagh	7-06	1	Affected Party
Rebecca May Nicolle	11-02, 11-05, 11-07, 11-08, 12-02, 13-02, 14-01, 14-02, 14-09, 15-03, 15-04, 15-05, 15-11, 15-12, 16-01, 16-02	1 and 2	Affected Party
Richard Adrian Hutton	4-03	1	Affected Party
Richard Falco	7-06	1	Affected Party
Richard Joseph Mortlock	5-02, 5-03, 5-06, 5-07, 5-08, 7-01, 7-02	1	Affected Party
Richard Martin Tilbrook	10-29, 10-33, 11-01, 11-02, 11-03, 11-05, 9-04, 9-06	1	Affected Party
Richard Seymour Paley Tuke	4-03, 4-05, 5-01, 5-02	1	Affected Party
R L Long (Farms) Limited	7-08, 8-01	1	Affected Party
Robert Dean	18-06, 18-07	1	Affected Party
Robin David Barclay	15-12, 16-01, 16-02, 16-03	1	Affected Party
Roger John Turner	14-02, 14-03, 14-07, 15-01, 15-11, 9-02, 9-04	1	Affected Party
Rosemary Forsythe Hutton	4-03	1	Affected Party
South Staffordshire Water plc	15-03, 15-05, 15-12, 16-06	2	Interested Party

Party Name	Plots in the vicinity of NMC-02	Book of Reference Category	Affected / Interested Party
Suffolk County Council	4-03, 5-02, 5-03, 5-04, 5-08, 7-06, 7-07, 8-02	1 and 2	Interested Party
Susan Ellen Chapman	18-09, 18-11, 18-12, 18-13, 18-14	1 and 2	Interested Party
Swaffham Internal Drainage Board	1-01, 5-03, 15-12, 16-02, 16-04, 16-08, 16-15, 16-18, 17-01, 17-03, 18-01, 18-19, 19-01, 19-02, 19-04, 19-06, 19-08, 19-10, 19-13, 19-14, 20-06, 20-08, 20-09, 20-12, 20-13, 20-14, 20-25, 20-28	2	Affected Party
Tarmac Cement and Lime Limited	17-03, 18-01	1	Affected Party
Teresa Anne Mitcham	18-16, 18-17, 18-18, 19-02, 19-03, 19-04	1	Interested Party
The Agricultural Mortgage Corporation plc	4-05, 5-01	2	Affected Party
The Chancellor Masters And Scholars Of The University Of Cambridge	18-03, 18-04, 18-05	2	Affected Party
The Occupier	18-10	1	Affected Party
The Occupier	18-09	1	Affected Party
The Occupier	16-04, 16-06	1	Affected Party
The Occupier	16-05, 16-07	1	Affected Party
The Occupier	20-10, 20-11, 20-14	1	Affected Party
The Occupier	10-29	1	Affected Party

Party Name	Plots in the vicinity of NMC-02	Book of Reference Category	Affected / Interested Party
The Occupier	18-18	1	Affected Party
The Occupier	17-03, 18-01	1	Affected Party
The Occupier	5-05, 7-03	1	Affected Party
The Occupier	7-08, 8-01	1	Affected Party
The Secretary of State for Transport	4-03	1	Affected Party
Thomas Pateman	18-16	2	Affected Party
Tony Slatter	18-16	2	Affected Party
Turners (Soham) Limited	16-16	1	Affected Party
UK Power Networks Limited	20-08, 20-09, 20-10, 20-11, 20-13, 20-14	2	Affected Party
Unknown	19-06	1	Affected Party
Unknown	19-13	1	Affected Party
Unknown	20-09	1	Affected Party
Unknown	19-08	1	Affected Party
Unknown	18-16	1	Affected Party
Unknown	10-31	1	Affected Party
Unknown	19-15, 20-01	1	Affected Party
Unknown	16-03	1	Affected Party

Party Name	Plots in the vicinity of NMC-02	Book of Reference Category	Affected / Interested Party
Unknown	20-10, 20-11, 20-14	1	Affected Party
Unknown	19-10	1	Affected Party
Unknown	19-04	1	Affected Party
Unknown	19-02	1	Affected Party
Unknown	18-17	1	Affected Party
Unknown	18-14	1	Affected Party
Unknown	8-03	1	Affected Party
Unknown	5-04, 5-06, 7-02	1	Affected Party
Vehicle Dismantlers Limited	7-06	1	Affected Party
Vodafone Limited	19-03, 20-10, 20-11, 20-14, 20-28	2	Affected Party
W E & D M Smith	1-01, 4-01	1	Affected Party
Willa Anne Philippa Bailey	14-08, 14-09, 15-02, 15-03, 15-04, 15-05	1 and 2	Affected Party
Yvonne Ann Lawson	18-16	2	Affected Party

4.5 Schedule of consequential amendments to DCO application documents

Table 4-3: NMC-02 Schedule of consequential amendments to application documents

Application document reference	PINS document reference	Application document name and (where relevant) sheet number	Current Version	Report Appendix where Changes Shown	Summary of Changes
EN010106/APP/6.1	APP-035	Chapter 3: Scheme Description	00	Appendix E	Chapter 3: Scheme Description has been amended to incorporate the proposed design changes.
EN010106/APP/7.3	APP-264	Design and Access Statement	00	Appendix F	Design and Access Statement has been amended to incorporate the proposed design changes.
EN010106/APP/3.1	APP-019	Draft Development Consent Order – Schedule 1	00	Appendix G	The definition of “electrical cables” has been amended so as to include 400 kV cables.
EN010106/APP/2.2	AS-004	Access and Rights of Way Plans (Sheet 20)	01	Appendix I	Access off Weirs Drove (CR-A1 to CR-A2) has been relocated approximately 50m to the west to the existing Burwell National Grid Substation’s existing access. No amendments to the wording of the corresponding entry in Part 1 of Schedule 7 to the draft DCO is required to facilitate this change.
N/A	N/A	Figure 3-31: Cable Route Cross Sections – 400kV solution (illustrative)	00	Appendix J	A new figure has been provided to show the 400kV cable cross section.
N/A	N/A	Joint Bay Sections – 400kV solution (illustrative)	00	Appendix J	A new figure has been provided to show the 400kV jointing bay section.

5 Proposed Change 3: 33 to 400kV transformers

5.1 Description of the change

- 5.1.1 Should Option 3 be taken forward, the substations at Sunnica West Site A, Sunnica East Site A and Sunnica East Site B will need to change in terms of their electrical configuration and therefore their general arrangement and layout would also be different, but within the parameters assessed in the ES submitted as part of the Application. This is owing to the introduction of a 33kV/400KV transformer in place of the 33kV/132kV transformers that would be required under Options 1 and 2. A shunt reactor would also need to be introduced at Sunnica East Site B. The construction programme for the substations at Sunnica West Site A, Sunnica East Site A and Sunnica East Site B will be extended slightly to 50 weeks, from the current proposed 30 weeks as a result of the additional technical complexity of the 400kV configuration; however, this is still within the 24 month worst case construction programme assessed within the ES. Figure 5-1 to 5-6 overleaf show the relevant changes.
- 5.1.2 As a result of the above, the Applicant has undertaken additional swept path analysis (vehicle tracking) for a worst case Abnormal Indivisible Load (AIL) to ensure that the electrical infrastructure required under Option 3 i.e. a 33kV/400kV transformer and shunt reactor (Sunnica East Site B only) can be safely transported to the onsite substations. To ensure a robust assessment, the tracking has also been redone for Burwell National Grid Substation Extension Option 2 using the worst case vehicle that has been utilised for the Option 3 solution. The findings of the swept path analysis are provided in Appendix P.
- 5.1.3 The swept path analysis has identified that all of the AIL movements can be accommodated within the bounds of the existing highway, with one exception. That exception relates to a left hand turn off of Mildenhall Lane (see sheet 20 of the Works Plans) where the bed of the AIL will over sail private land. To accommodate this over sailing a minor extension to the Order limits is sought together with a power to temporarily possess that land to facilitate the AIL movements.
- 5.1.4 The construction methodology and techniques used at each sites' substation will remain within the parameters of the construction assessments carried out for the ES. This change of technology eliminates the need for additional equipment to be installed at Option 2 located adjacent to the Burwell National Grid Substation.
- 5.1.5 Before and after images of the illustrative general arrangement plans are provided below. The Application figure reference is provided below for information.

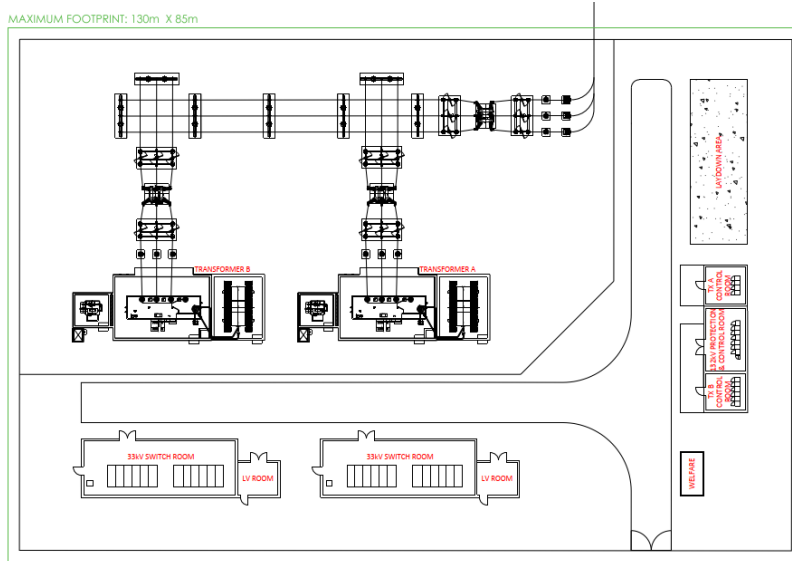


Figure 5-1: General Arrangement – Sunnica West Site A – 132kV solution (illustrative) (See Figure 3-9b of the Application [EN010106/APP/6.3])

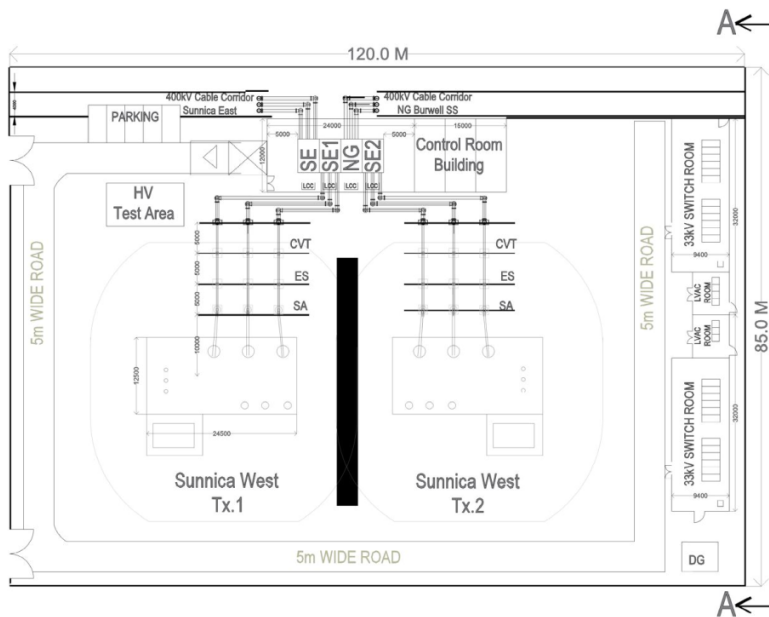


Figure 5-2: Proposed General Arrangement – Sunnica West Site A – 400kV solution (Illustrative)

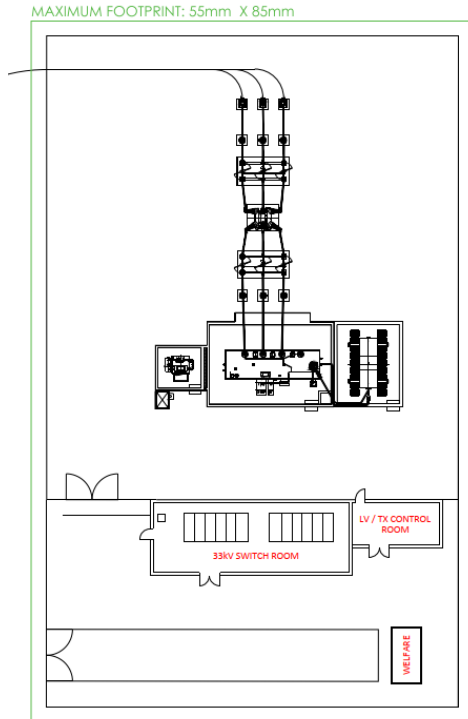


Figure 5-3: General Arrangement – Sunnica East Site A – 132kV solution (illustrative) (See Figure 3-10b of the Application [EN010106/APP/6.3])

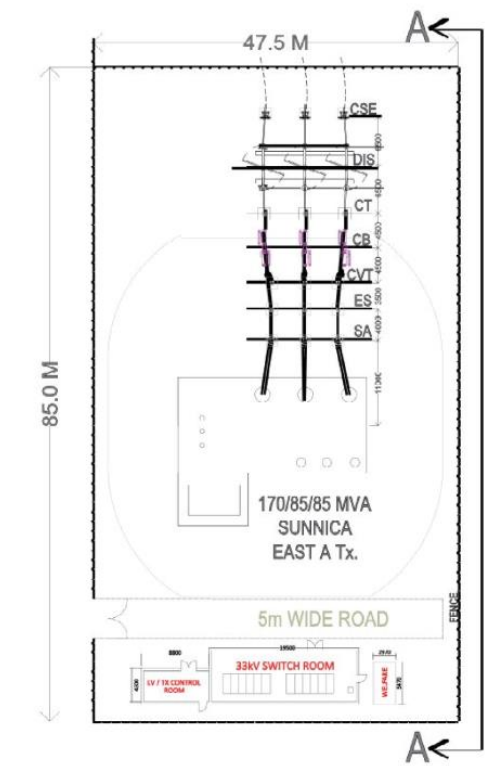


Figure 5-4: Proposed General Arrangement – Sunnica East Site A – 400kV solution (Illustrative)

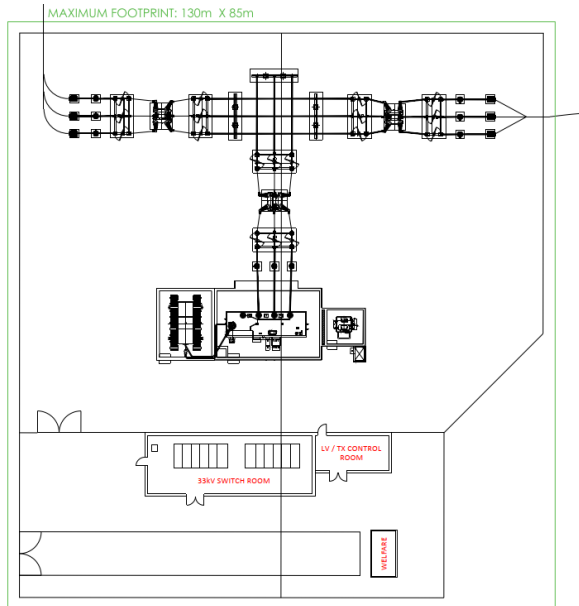


Figure 5-5: General Arrangement – Sunnica East Site B – 132kV solution (illustrative) (See Figure 3-11b of the Application [EN010106/APP/6.3])

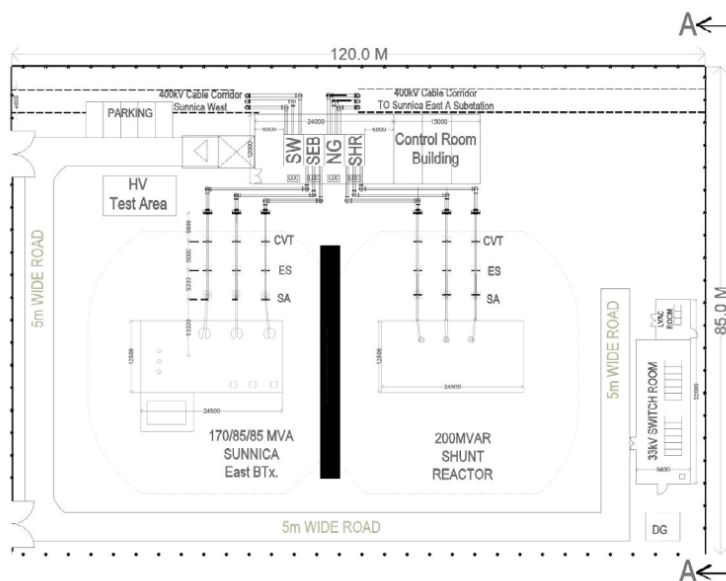


Figure 5-6: Proposed General Arrangement – Sunnica East Site B – 400kV solution (Illustrative)

5.1.6 Before and after images of the illustrative elevation plans are provided below in Figures 5-7 to 5-12. The Application figure reference is provided below for information.

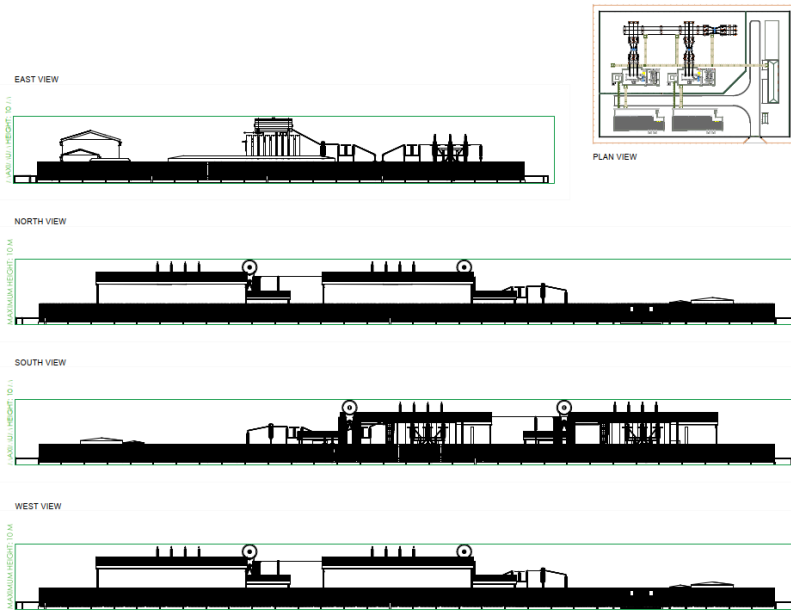


Figure 5-7: Sunnica West Site A Substation Elevation – 132kV solution (illustrative) (See Figure 3-9a of the Application [EN010106/APP/6.3])

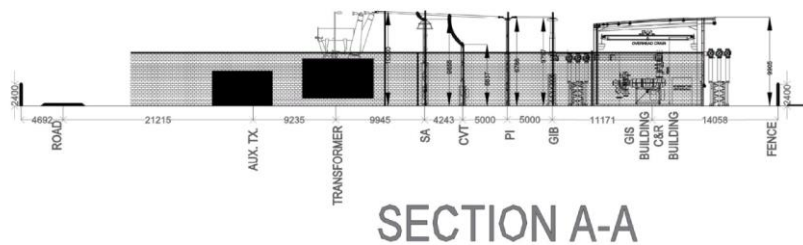


Figure 5-8: Sunnica West Site A Substation Elevation – 400kV solution (illustrative)

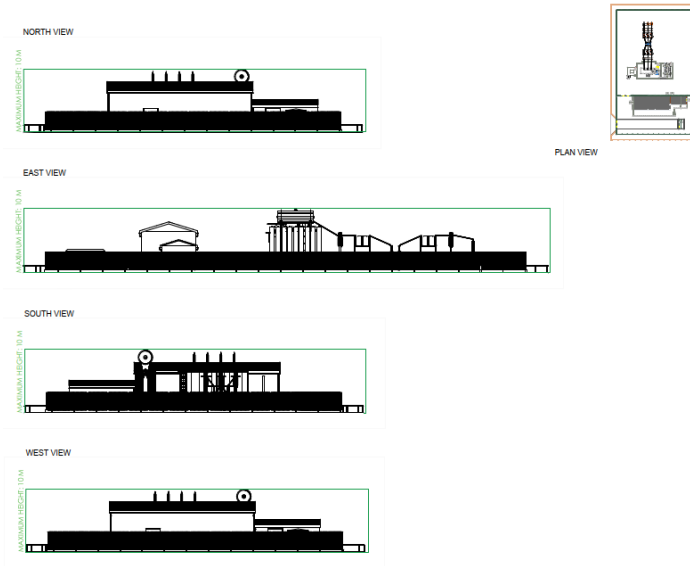


Figure 5-9: Sunnica East Site A Substation Elevation – 132kV solution (illustrative) (See Figure 3-10a of the Application [EN010106/APP/6.3])

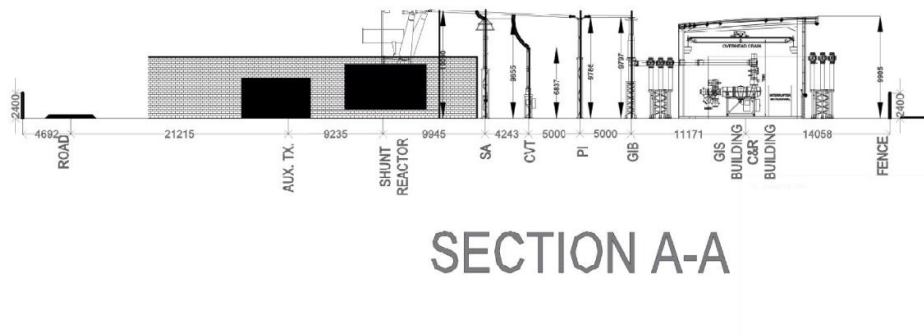
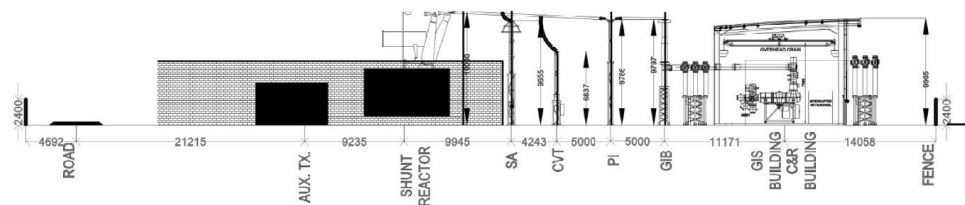


Figure 5-10: Sunnica East Site A Substation Elevation – 400kV solution (illustrative)



Figure 5-11: Sunnica East Site B Substation Elevation – 132kV solution (illustrative) (See Figure 3-11a of the Application [EN010106/APP/6.3])



SECTION A-A

Figure 5-12: Sunnica East Site B Substation Elevation – 400kV solution (illustrative)

5.2 Summary of environmental appraisal

- 5.2.1 The proposed changes associated with NMC-03 have been reviewed and assessed, as summarised in Table 5-1, to identify any likely significant effects that would be new or materially different from those presented in the Scheme ES **[APP-036 and APP-038 to APP-048]**.
- 5.2.2 As outlined in Section 5.1 above, should NMC-03 proceed it will eliminate the need for Burwell National Grid Substation Extension Option 2. Therefore, below outlines the potential effects of proceeding with NMC-03, but where relevant it also outlines the effects should the need for Option 2 be eliminated. However, Option 2 will remain in the Applicant's application for development consent until such time as a variation to the Applicant's connection agreement with National Grid Electricity Transmission to accommodate Option 3, has been completed.

Table 5-1: Likely Environmental Effects of NMC-03

ES Chapter number	ES Chapter heading	Likely effect of the changes	Material change / non-material change / no change
4	Alternatives and Design Evolution	The proposed change in technology or the AIL swept path analysis does not affect the point of connection to the national grid, the reasons for selecting the site, or the reasons for selecting the proposed technology.	No change
6	Climate Change	<p>The proposed change will result in minor changes to GHG emissions associated with the embodied carbon in the different transformer designs, the additional shunt reactor at Sunnica East B, and minor works resulting from the outcome of the AIL swept path analysis. However, as these aspects are expected to only contribute to a small proportion of the GHG footprint, the proposed change will not have a material impact in the context of the overall GHG assessment.</p> <p>The proposed change will not result in any material changes to operational emissions associated with the Scheme.</p> <p>The proposed change will not result in any changes to the climate change resilience review of the Scheme.</p>	Non-material change
7	Cultural Heritage	<p>The proposed change is within the parameters as assessed within Chapter 7: Cultural Heritage [APP-039] of the ES, therefore, there are no changes to the cultural heritage assessment as a result of change in technology or the AIL swept path analysis.</p> <p>No effects were associated with Burwell National Grid Substation Extension Option 2 and therefore, should NMC-03 proceed and eliminate the need for Option 2, it will not result in a change to the cultural heritage assessment.</p>	No change
8	Ecology and Nature Conservation	<p>The proposed change is within the parameters as assessed in Chapter 8: Ecology and Nature Conservation [APP-040] of the ES. There are no changes to the ecology and nature conservation assessment as a result of NMC-03. Changes in noise as a result of NMC-03 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, at the closest receptor which is considered representative of the Stone Curlew sites. This is not anticipated to alter the magnitude of impact / significance effect of the Scheme on biodiversity, including Stone Curlews.</p> <p>The change would not require updates to the Habitats Regulations Assessment documentation submitted with the Application and neither would a new EPS licence would be required as a consequence of NMC-03.</p> <p>The requirement for minor vegetation clearance resulting from the outcome of the AIL swept path analysis will not result in a material change to the Ecology and Nature Conservation assessment</p>	No change

ES Chapter number	ES Chapter heading	Likely effect of the changes	Material change / non-material change / no change
		<p>reported in the ES. All removal of vegetation will be carried out in accordance with the Framework Construction Environmental Management Plan [EN010106/APP/6.2].</p> <p>No effects were associated with Burwell National Grid Substation Extension Option 2. Therefore, should NMC-03 proceed and eliminate the need for Burwell Option 2, it will not result in a change to the assessment.</p>	
9	Flood Risk, Drainage and Water Resources	<p>The proposed change is within the parameters as assessed in Chapter 9: Flood Risk, Drainage and Water Resources [APP-041] of the ES; therefore, there are no changes to the assessment as a result of NMC-03. All mitigation as stated in that chapter will remain, for example bunding. The revised AIL swept path analysis does not have any effect on the assessment of Flood Risk, Drainage and Water Resources.</p> <p>Should NMC-03 proceed and eliminate the need for Burwell National Grid Substation Extension Option 2, this would result in a reduction in fluvial flood risk of the Scheme and have a beneficial effect for the Scheme (albeit not considered to be a material change to the results of the assessment).</p>	Non-material change
10	Landscape and Visual Amenity	<p>The proposed change is within the parameters as assessed in Chapter 10: Landscape and Visual Amenity [APP-042] of the ES. The proposed substations were assessed with regards to their location and massing within the maximum parameters in terms of extent and height of the equipment within them, as set out in the Assumptions (paragraph 10.3.10 of Chapter 10 [APP-042]) and indicated on Figures 3-1 [APP-135] and 3-2 [APP-136] of the ES. Therefore, changes to the layout of the substations and equipment within them will not have any implications on the effects on landscape and visual amenity reported in the ES as the maximum parameters have not changed. On this basis, the findings of Chapter 10 will remain as reported.</p> <p>Providing any vegetation removal, clearance or branch trimming is undertaken under the supervision of an appropriately qualified ecologist, arboriculturist or landscape architect, and in accordance with the Framework Construction Environmental Management Plan [EN010106/APP/6.2], the revised tracking will not have any implications on the effects on landscape and visual amenity reported in the ES.</p> <p>Should NMC-03 proceed and eliminate the need for Burwell National Grid Substation Extension Option 2, it would result in the removal of the additional proposed above ground infrastructure in the vicinity of Burwell National Grid Substation. This would result in none of the predicted environmental effects associated with Option 2 being realised for receptors in this location. This is considered a beneficial effect resulting from NMC-03 (albeit not considered to be a material change to the results of the assessment).</p>	No change

ES Chapter number	ES Chapter heading	Likely effect of the changes	Material change / non-material change / no change
11	Noise and Vibration	<p>Changes to the noise emissions from the Scheme would result from the introduction of 33kV/400kV transformers at Sunnica East A, Sunnica East B and Sunnica West A and a shunt reactor at Sunnica East B. The change to infrastructure associated with NMC-03 has the potential to increase noise levels over those predicted at sensitive receptors within Chapter 11: Noise and Vibration [APP-043] of the ES.</p> <p>Changes in noise as a result of NMC-03 would result in 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 NMC-03 would not result in additional significant noise effects.</p> <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> <p>The construction programme for the substations associated with NMC-03 has been reviewed as part of the engineering design and is expected to be carried out over longer periods (up to 50 weeks) than assumed in the ES, to account for the additional complexity of the 400kV electrical configuration. As outlined below in the Transport and Access section, the number of HGV and staff vehicle movements are not anticipated to change, and similarly the construction methods are not changing from those assessed within the ES. Although, the noise and vibration effects would be extended in duration they would be expected to be lower in magnitude from construction traffic as it would involve less traffic movements over a longer period. Therefore the conclusions of the construction traffic impact assessment would therefore remain valid and represent the worst-case situation, while the noise and vibration from onsite activities would remain as assessed in the ES.</p> <p>Any AIL vehicle movements may result in a noise impact at sensitive receptors along the planned route; however, any noise impacts would be limited to the period that the vehicle will pass by a receptor and, as such, would not be of sufficient duration to result in a change in behaviour, attitude or other physiological response. As such, the Abnormal Indivisible Load would not result in a material change to the assessment of noise.</p>	Non-material change

ES Chapter number	ES Chapter heading	Likely effect of the changes	Material change / non-material change / no change
12	Socio-Economics and Land Use	<p>The proposed change from 132kV to 400kV transformers would not have an impact on the Chapter 12: Socio-Economics and Land Use [APP-044] of the ES. The type of transformer used as part of the Scheme would not influence any potential effects experienced by socio-economic receptors. This takes into account the swept path analysis of transporting the transformers and Shunt Reactor to the site.</p>	No change
13	Transport and Access	<p>During the construction programme the proposed change will not require additional movements of HGVs to the Scheme; however, there will be a small redistribution of HGVs which would have previously accessed Burwell to access Sunnica West Site A. Within Table 2-1 in the Framework Construction Management Plan and Travel Plan [EN010106/APP/6.2], the forecast peak daily HGVs associated with the Burwell National Grid Extension is nine HGVs per day. This would result in an increase of circa one HGV per hour to Sunnica West Site A, at the peak of the construction period. The HGV vehicle route would be via the A11 and La Hogue Road. The increase in HGVs on the highway links is not expected to result in changing the category of effects presented in the ES.</p> <p>The construction programme for the substations associated with NMC-03 has been reviewed as part of the engineering design and is expected to be carried out over longer periods (up to 50 weeks) than assumed in the ES, to account for the additional complexity of the 400kV electrical configuration. Therefore, the forecast daily construction HGVs and staff presented in the ES represent a worst-case scenario. Notwithstanding this, as a result of a longer construction programme, the daily number of HGVs and staff on the local highway network are expected to be fewer than that assessed in the ES which reduces the forecast impact presented in the ES, as the same total number of movements are distributed over a longer period lowering the daily average.</p> <p>During the decommissioning phase the proposed change will remain equal to or less than that forecast during the construction phase and the likely effects of the change outlined above.</p> <p>On this basis, the finding of Chapter 13 of the ES remains the worst-case scenario with non-material change as a result of the distribution of HGVs during the construction phase.</p> <p>As a result of the AIL swept path analysis, a minor change to the Order limits has been made at the Mildenhall Road/Ferry Lane T-junction to accommodate the over-sail of the 46.63m AIL trailer at the junction.</p> <p>Should NMC-03 proceed and eliminate the need for Burwell National Grid Substation Extension Option 2, it will decrease the number of Abnormal Indivisible Loads as a result of there being one less substation required for the Scheme, as well as fewer staff mini-bus movements to travel</p>	Non-material change

ES Chapter number	ES Chapter heading	Likely effect of the changes	Material change / non-material change / no change
		from the Sunnica West Site A staff car park to Burwell, therefore, these will be below those assessed in Chapter 13: Transport and Access [APP-045] of the ES. The change also removes the requirement for the highway works on Weirs Drove and Newham Drove to facilitate site access to the Option 2 substation area.	
14	Air Quality	<p>The construction and decommissioning methodology will be similar to that as outlined in Chapter 3: Scheme Description [EN010106/APP/6.1] of the ES, therefore, there is not expected to be a change in the fugitive emissions of particulate matter or non-road mobile machinery emissions (NRMM), as a result of NMC-03. Similarly, as described in the Transport and Access section above, the number of HGV trips will not change but the distribution will change slightly. A forecast daily peak of nine HGVs per day travelling to Sunnica West Site A rather than Burwell National Grid Substation will not materially change the findings outline in the construction phase road traffic emissions assessment. As a result of the AIL swept path analysis, a minor update to the Order limits has been made at the Mildenhall Road/Ferry Lane T-junction to accommodate the over-sail of the 46.63m AIL trailer at the junction, this will not change the conclusions of the Air Quality Assessment.</p> <p>As described in the Transport and Access section above, the construction programme is expected to be carried out over longer periods (up to 50 weeks rather than 30 weeks) than assumed in the ES. Therefore, the forecast daily construction HGVs and staff presented in the ES represent a worst-case scenario as it compresses the construction phase and therefore yields a higher number of daily and peak hour trip movements offsite and a greater number of plant onsite at any one time consequently, the construction road traffic emissions assessment in the ES are a worst case and will not change.</p>	No change
15	Human Health	The proposed change in transformer type will not influence any potential outcomes of the Scheme experienced by Human Health receptors such that the findings of Chapter 15: Human Health [APP-047] of the ES would not change. This takes into account the swept path analysis of transporting the transformers or shunt reactor to the site.	No change
16	Other Environmental Topics	The infrastructure required for this proposed change is within the parameters of the onsite substations as assessed in Chapter 16: Other Environmental Topics [APP-048] of the ES. Therefore, there are no changes to the assessment of Glint and Glare, Ground Conditions, Telecommunications, Television Reception, Waste, Major Accidents and Disasters and Utilities during construction, operation or decommissioning. Similarly, the minor change to the Order	No change

ES Chapter number	ES Chapter heading	Likely effect of the changes	Material change / non-material change / no change
		limits as a result of the swept path analysis will not impact on any of the topics assessed in Chapter 16: Other Environmental Topics [APP-048]. As there are no effects associated with Burwell National Grid Substation Extension Option 2 for the above mentioned topics, if Option 3 were to go ahead and eliminate the need for Option 2, it would not change the assessments outlined in the ES.	

5.3 Schedule of engagement with relevant affect person/interested parties in relation to the proposed change

5.3.1 The proposed changes associated with NMC-03 have been reviewed and the following affected parties have been identified as having an interest in the land affected. The plots listed in Table 5-2 were determined to be affected by this change as they are subject to the siting of the 400kV substations and BESS located at Sunnica East Site A and B and Sunnica West Site A. All interested and/or affected parties were consulted on all three proposed changes.

Table 5-2: NMC-03 Schedule of Engagement

Party Name	Plots in the vicinity of NMC-03	Book of Reference Category	Affected / Interested Party
James Edward Waters	1-01	1	Affected Party
Lloyds Bank plc	1-01	2	Affected Party
Jonathan Robert Waters	1-01	1	Affected Party
Collmart Growers Limited	1-01	1	Affected Party
Newbury Pigs Limited	1-01	1	Affected Party
W E & D M Smith	1-01	1	Affected Party
Anglian Water Services Limited	1-01, 12-02	2	Affected Party

Party Name	Plots in the vicinity of NMC-03	Book of Reference Category	Affected / Interested Party
BT Group plc	1-01	2	Affected Party
Eastern Power Networks plc	1-01, 11-08, 12-02	2	Affected Party
Environment Agency	1-01, 12-02	2	Interested Party
James Waters Property and Investments Limited	1-01	2	Affected Party
Openreach Limited	1-01	2	Affected Party
Swaffham Internal Drainage Board	1-01	2	Affected Party
Hugo Edward Upton	7-05	1	Interested Party
EFG Nominees Limited	7-05	1	Affected Party
EFG Trust Company Limited	7-05	1	Affected Party
Frimstone Limited	7-05	1	Affected Party
Cadent Gas Limited	7-05	2	Interested Party
National Grid Gas plc	7-05	2	Interested Party
David William Barclay	11-08, 12-02	1	Affected Party
David Norman Chastel De Boinville	11-08, 12-02	1	Affected Party
Mills & Reeve Trust Corporation Limited	11-08, 12-02	1	Affected Party
Rebecca May Nicolle	11-08, 12-02	1	Affected Party

Party Name	Plots in the vicinity of NMC-03	Book of Reference Category	Affected / Interested Party
Moulton Manor Farm	11-08, 12-02	1	Affected Party
Kevin Neil Arrowsmith	12-02	2	Affected Party
Joseph John Alfred Magri	12-02	2	Affected Party

5.4 Schedule of consequential amendments to DCO application documents

Table 5-3: NMC-03 Schedule of consequential amendments to application documents

Application document reference	PINS document reference	Application document name and (where relevant) sheet number	Current Version	Report Appendix where Changes Shown	Summary of Changes
EN010106/APP/4.3	APP-024	Book of Reference (parts 1 to 5)	00	Appendix D	Plot 21-04 has been added and shown in green to denote that a power of temporary possession is sought. The address for services for the interest affected by this change has also been amended.
EN010106/APP/6.1	APP-035	Chapter 3: Scheme Description	00	Appendix E	Chapter 3: Scheme Description has been amended to incorporate the proposed design changes and swept path analysis.
EN010106/APP/6.1	APP-032	Chapter 0 Table of Contents, Glossary and Abbreviations	00	Appendix E	Chapter 3: Scheme Description has been amended to incorporate the proposed design changes and swept path analysis.
EN010106/APP/7.3	APP-264	Design and Access Statement	00	Appendix F	Design and Access Statement has been amended to incorporate the proposed design changes.

Application document reference	PINS document reference	Application document name and (where relevant) sheet number	Current Version	Report Appendix where Changes Shown	Summary of Changes
EN010106/APP/3.1	APP-019	Draft Development Consent Order – Schedule 1	00	Appendix G	"shunt reactor" has been added to the descriptions of Work Nos. 3B.
EN010106/APP/2.2	AS-004	Works Plans (Sheet 21)	01	Appendix I	Sheet 21 has been amended to include the oversail on 1102 Mildenhall Road / Unnamed Road Junction.
EN010106/APP/2.1	AS-003	Land and Crown Land Plans (Sheet 21)	01	Appendix I	Sheet 21 has been amended to include the oversail on 1102 Mildenhall Road / Unnamed Road Junction.
EN010106/APP/2.2	AS-004	Access and Rights of Way Plans (Sheet 21)	01	Appendix I	ARoW plans have been amended to extend AS-37 as a result of the over sail of land outside of the highway boundary. No amendment to the wording of the corresponding entry in Part 2 of Schedule 5 of the draft DCO is required to facilitate this change.
EN010106/APP/2.4	APP-009 to APP-011	Traffic Regulation Measures Plans - Road Closures (Sheet 0)	00	Appendix I	Updated to reflect the change in the Order limits associated with the AIL over-sail.
EN010106/APP/2.4	APP-12 to APP-013	Traffic Regulation Measures Plans - Temporary Measures (Sheet 0)	00	Appendix I	Updated to reflect the change in the Order limits associated with the AIL over-sail.
EN010106/APP/2.5	AS-006	Location Plan (Sheets 16 and 23)	01	Appendix I	Updated to reflect the change in the Order limits associated with the AIL over-sail.
EN010106/APP/2.6	APP-015	Nature Conservation Habitats of Protected Species and Important Habitats Plan (Sheet 16)	00	Appendix I	Updated to reflect the change in the Order limits associated with the AIL over-sail.

Application document reference	PINS document reference	Application document name and (where relevant) sheet number	Current Version	Report Appendix where Changes Shown	Summary of Changes
EN010106/APP/2.7	APP-016	Water Bodies in a River Basin Management Plan (Sheets 16 and 23)	00	Appendix I	Updated to reflect the change in the Order limits associated with the AIL over-sail.
EN010106/APP/2.8	APP-017	Features of the Historic Environment Plan (Sheet 16)	00	Appendix I	Updated to reflect the change in the Order limits associated with the AIL over-sail.
N/A – New Figure	N/A	Figure 3-28a: Sunnica West Site A Substation Elevation - 400kV solution (illustrative)	N/A	Appendix J	A new figure has been provided to show Sunnica West Site A substation elevation for the 400kV solution.
N/A – New Figure	N/A	Figure 3-28b: Sunnica West Site A Substation General Arrangement – 400kV solution (illustrative)	N/A	Appendix J	A new figure has been provided to show Sunnica West Site A substation general arrangement for the 400kV solution.
N/A – New Figure	N/A	Figure 29 – Sunnica East Site A Substation Elevation and General Arrangement – 400 kV solution (illustrative)	N/A	Appendix J	A new figure has been provided to show Sunnica East Sites A and B substation elevation and general arrangement for the 400kV solution
N/A – New Figure	N/A	Figure 3-30a: Sunnica East Site B Substation Elevation – 400kV solution (illustrative)	N/A	Appendix J	A new figure has been provided to show Sunnica East Site B substation elevation for the 400kV solution
N/A – New Figure	N/A	Figure 3-30b: Sunnica East Site B Substation General Arrangement – 400kV solution (illustrative)	N/A	Appendix J	A new figure has been provided to show Sunnica East Site B substation general arrangement for the 400kV solution.

Application document reference	PINS document reference	Application document name and (where relevant) sheet number	Current Version	Report Appendix where Changes Shown	Summary of Changes
EN010106/APP/4.4	APP-025	Schedule of Negotiations and Powers Sought	00	Appendix L	Plot 21-04 has been added to reflect that this plot is required temporarily during construction for the purposes of facilitating the passage of abnormal indivisible loads.
EN010106/APP/6.2	APP-118	Appendix 13: Framework Construction Traffic Management Plan and Travel Plan	00	Appendix Q	Amended to include the swept path analysis and to reflect the consequent changes to traffic management.

Appendices