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Date: 28 November 2022  
Our Ref: EDGEWOC\342777-000057  
Direct: [REDACTED]  
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Dear Sirs

**Sunnica Solar Farm (the "Project")**

**Comments on Applicant's revised draft DCO – Deadline 3A**

**Comments by National Grid Electricity Transmission on Applicant's revised draft DCO**

We write on behalf of National Grid Electricity Transmission Plc ("NGET") in connection with the Project and provide the below comments regarding the revised draft DCO submitted by the Promoter on 16 November 2022.

The DCO is still drafted to the effect that NGET have the benefit of Work No.5 (which includes Work No.5B and Work No.5C) under Article 32 of the Order. As previously advised in its Relevant Representation and other correspondence with the Promoter, NGET do not consider that this is necessary and as such this drafting will need to be amended.

NGET are concerned that the draft DCO does not accurately reflect the revised Project following the removal of Option 1. Of particular concern are the details of Work No.5, Work No.5B and Work No.5C contained at Schedule 1 to the draft DCO, all of which make reference to "*an extension to the substation*" or "*an extension to the existing substation*". To NGET's knowledge, this does not accurately reflect the most recent proposals as it is understood that the Promoter's own substation will now not be located at Burwell. In any event, all references to an extension to the Burwell Substation are misleading (as are references to the *Burwell National Grid Substation Extension* throughout the application documents) as the Promoter's substation will be an entirely separate asset with no relevance to NGET's undertaking at Burwell. The draft DCO will need to be amended to accurately reflect the Promoter's proposals. Additionally, NGET note that the works plans show that Work No.5C encumbers the entirety of the Burwell Substation. NGET do not consider that this is necessary, Work No.5c should only apply to the location that the Project will connect into the Burwell Substation.

As a responsible statutory undertaker, NGET's primary concern is to meet its statutory obligations and ensure that any development does not impact in any adverse way upon those statutory obligations.

NGET is in discussion with the Promoter regarding the above comments and hopes to reach a mutually agreeable position. In the meantime, NGET reserves its right to make further representations as part of the examination process.

Yours faithfully

[REDACTED]  
**Eversheds Sutherland (International) LLP**