



SUNNICA ENERGY FARM

EN010106

Draft Statement of Common Ground with Parish Councils

Planning Act 2008

Infrastructure Planning (Examination Procedure) Rules 2010



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

Sunnica Energy Farm

Draft Statement of Common Ground with the Parish and Town
Councils' Alliance

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1 Introduction

1.1 Purpose of this document

1.1.1 This Statement of Common Ground (SoCG) has been prepared in respect of the application for the proposed Sunnica Energy Farm Development Consent Order ("the Application") made by Sunnica Limited ("Sunnica") to the Secretary of State for the Department for Business, Energy and Industrial Strategy ("Secretary of State") for a Development Consent Order ("the Order") under section 37 of the Planning Act 2008 ("PA 2008").

1.1.2 The Order, if granted, would authorise Sunnica to construct, operate (including maintain) and decommission a ground mounted solar farm across Sunnica East Site A, Sunnica East Site B, Sunnica West Site A and Sunnica West B. The Scheme includes the following key components:

- a. Solar PV modules;
- b. PV module mounting structures;
- c. Inverters;
- d. Transformers;
- e. Switchgear;
- f. Onsite cabling (including high and low voltage cabling);
- g. One or more BESS (expected to be formed of lithium ion batteries storing electrical energy) on Sunnica East Site A, Sunnica East Site B, and Sunnica West Site A;
- h. An electrical compound comprising a substation and control building (Sunnica East Site A, Sunnica East Site B, and Sunnica West Site A only);
- i. Burwell National Grid Substation Extension, should Burwell National Grid Substation Extension Option 2 be taken forward;
- j. Office/warehouse (Sunnica East Site A and Sunnica East Site B only)
- k. Fencing and security measures;
- l. Drainage;
- m. Internal access roads and car parking;
- n. Landscaping including habitat creation areas; and
- o. Construction laydown areas.

1.1.3 This SoCG does not seek to replicate information which is available elsewhere within the Application documents. All documents are available in the deposit locations and/or the Planning Inspectorate website.

1.1.4 This SoCG has been produced to confirm to the Examining Authority (ExA) where agreement has been reached between the parties to it, and where agreement has not (yet) been reached. SoCGs are an established means in the planning process of allowing all parties to identify and so focus on specific issues that may need to be addressed during the examination.

1.2 Parties to this Statement of Common Ground

1.2.1 This SoCG has been prepared by (1) Sunnica as the Applicant and (2) Chippenham Parish Council, Exning Parish Council, Fordham Parish Council, Freckenham Parish Council, Isleham Parish Council, Mildenhall High Town Council, Newmarket Town Council, Reach Parish Council, Red Lodge Parish Council, Snailwell Parish Council and Worlington Parish Council, herein referred to as 'the Parish and Town Councils' Alliance'.

1.2.2 Sunnica is a Special Purpose Vehicle (SPV) incorporated in December 2013 to construct, operate, and decommission the Sunnica Energy Farm.

1.2.3 The Town and Parish Council Alliance is the interested party to the Examination of the Application.

1.2.4 Collectively Sunnica and the Parish and Town Councils' Alliance are referred to as 'the parties'.

1.3 Terminology

1.3.1 In the tables in the Issues chapter of this SoCG:

- a. "Agreed" indicates where the issue has been resolved.
- b. "Not Agreed" indicates a final position of the parties that is not agreed, and
- c. "Under discussion" indicates where these points are the subject of on-going discussion wherever possible to resolve, or refine, the extent of disagreement between the parties.

1.3.2 It can be taken that any matters not specifically referred to in the Issues chapter of this SoCG are not of material interest or relevance to the parties' representation and therefore have not been considered in this document.

1.4 Initial SoCGs

1.4.1 Individual SoCGs were prepared and submitted at Deadline 2 for Chippenham Parish Council, Fordham Parish Council, Freckenham Parish Council, Isleham Parish Council, Mildenhall High Town Council, Newmarket Town Council, Reach Parish Council, Red Lodge Parish Council, Snailwell Parish Council and Worlington Parish Council. All of the Parish and Town Councils listed, plus Exning Parish Council, subsequently requested to submit a combined SoCG as the Parish and Town Councils' Alliance.

2 Issues

2.1 Matters Agreed

2.1.1 **Table 1** below details the matters agreed with the Parish and Town Councils' Alliance.

Table 1: Matters agreed

Topic	Sub-topic	Details of Matters Agreed
General	Support for renewable energy	The parties support renewable, sustainable energy and agree there is a need for the provision of renewable energy in the UK.

2.2 Matters Under Discussion

2.2.1 **Table 2** below details the matters under discussion with the Parish and Town Councils' Alliance.

Table 2: Matters Under Discussion

Topic	Sub-topic	Details of Matters Under Discussion
General	Electrical losses	Whether Sunnica has given enough consideration to the electrical losses associated with the length of the grid connection.
	Compulsory Acquisition	Whether or not an appropriate level of information has been provided regarding land which has been proposed for compulsory acquisition.
	Local planning policies	Whether or not the Scheme is consistent with local planning policies.
	Operational lifetime	Should the operational lifetime of the Scheme be reduced to less than 40 years.
Scheme design	Scale	Whether or not the scale of the Scheme is acceptable.
	Alternative technologies	Whether or not the Applicant has provided sufficient evidence to justify the use of solar as opposed to alternative technologies.
	Layout	Whether or not the Applicant has provided sufficient evidence to support the chosen layout of the Scheme.
	Green infrastructure	Whether or not the Application has accurately outlined the areas considered to be green infrastructure.
	Battery energy storage system (BESS) capacity	Whether or not the Applicant has provided sufficient information regarding the MWh capacity of the BESS.
	BESS scale	Whether or not the scale of the BESS is appropriate.
	BESS location	Whether or not the Applicant has provided sufficient evidence to support the selection of the BESS locations
	Scheme location	Whether or not the Applicant has provided sufficient evidence to support the selection of the Scheme's location.

Topic	Sub-topic	Details of Matters Under Discussion
Consultation	Consultation materials	Whether the consultation materials prepared by Sunnica for the pre-application consultation were accurate.
	Adequacy of consultation	Whether or not the consultation undertaken by the Applicant was sufficient.
	Satisfactory responses to pre-application consultation	Whether Sunnica provided satisfactory responses to pre-application questions.
Methodology	Robustness of Assessment	Whether or not the landscape assessment robustly and accurately assesses the likelihood of significant effects arising from the Scheme.
	Level of detail in the Application	Whether or not the information submitted with the Application was sufficient for the purposes of a DCO application and whether it allowed for assessment of the likely effects of the Scheme.
Land Use	Agricultural land	Whether or not Sunnica's assessment of the effect of the Scheme on best and most versatile agricultural land is compliant with planning policy.
	Food security	What weight should be attributed to food security in the decision-making process.
	Impacts on agricultural land	Whether or not the Scheme will give rise to unacceptable impacts on best and most versatile agricultural land.
	Impacts on access to open spaces and views	Whether or not the effects of the Scheme on access to footpaths as well as views from those footpaths is acceptable.
	Visual effects on Green Drove Lane (U6006)	The assessment of the significance of the effects of the Scheme on green space and amenity areas in the vicinity of Green Drove Lane (U6006).
Climate Change	Project carbon footprint	Whether or not the greenhouse gas emissions assessment in the Application accurately reports the carbon lifecycle of the Scheme.
	Carbon emissions	The appropriate methodology for calculating carbon emissions from the Scheme over its lifetime.
Landscape and Visual Amenity	Visual effects	Whether or not the visual effects of the Scheme have been robustly and accurately assessed, in accordance with relevant guidance.
	Views	Whether the visual effects of the Scheme are acceptable.
	Landscape amenity impacts	The effects of the Scheme on the landscape and amenity of the local area.

Topic	Sub-topic	Details of Matters Under Discussion
	Residential views	The effects of the Scheme on residential views.
	Visual mitigation	Whether the Applicant has proposed sufficient screening to mitigate the visual effects of the Scheme
	Landscape character	Whether or not the effects of the Scheme on the landscape character are acceptable.
	Screening establishment time	Whether the Application has given sufficient consideration to the time required to establish screening associated with the mitigation of the visual effects of the Scheme.
	Visual effects on Weirs Drove	Whether or not the visual effects of the substation on Weirs Drove and the landscape surrounding the substation are acceptable.
	Visual effects on Warren Hill	Whether or not the visual effects of the Scheme on views from Warren Hill are acceptable.
	Visual effects on Worlington routes	Whether or not the visual effects of the Scheme on routes in and out of Worlington are acceptable.
Ecology	Wildlife impacts from fencing	Whether or not adequate controls are included within the DCO application to ensure that the boundary treatments do not have unacceptable ecological effects.
	Selinum carvifolia	Whether or not the Scheme will affect <i>Selinum carvifolia</i> .
	Chippenham Fen	Whether or not the effects of the Scheme on ecology and nature at Chippenham Fen are acceptable
	Ecology	Whether or not impacts of the Scheme during construction on Stone Curlew, Tawny Owls, Bats, rare Fish species and Water Voles, and proposed mitigation, are acceptable.
	BESS	Whether or not there are environmental risks associated with the BESS.
	Wildlife habitats and corridors	Whether or not the effects of the Scheme on wildlife habitats and corridors are acceptable.
	Effects on wildlife and protected species	Whether or not the effects of the Scheme on wildlife and protected species, including stone curlew, swift, great crested newts and bats are acceptable.
	Biodiversity impacts	Whether or not the Application has adequately assessed the effects of the Scheme on biodiversity.
	Arboriculture	Whether or not the effects of the Scheme on arboriculture are acceptable and whether potential tree loss has been adequately assessed.
	PRoW closure and construction works	Whether or not the potential impacts on wildlife (bats) as a result of the construction works associated with the partial closure of U6006 are acceptable.

Topic	Sub-topic	Details of Matters Under Discussion
Human Health	BESS safety	Whether or not the proposed Outline Battery Fire Safety Management Plan adequately manages risks to the local community from BESS .
Socio-economics	Community benefits	Whether or not the Scheme provides appropriate community benefits.
	Impact on agricultural jobs	Whether or not the Scheme will lead to a reduction in agricultural jobs.
	Horse racing industry	Whether or not the Scheme will have impacts on the local horse racing industry.
	Demography	The effects of the Scheme on local population levels.
Transport and Access	HGV traffic	What effects the Scheme could have on HGV traffic on local roads.
	Road safety	Whether or not the effects of the Scheme on road safety during construction are acceptable.
	Worlington road crossing points	Whether or not the crossing points on the road through Worlington are adequate.
	Staff parking	Whether or not staff parking provided by the Scheme during construction is adequate.
	Impacts on road traffic	Whether or not the A11 slip roads can support the increase in traffic associated with the Scheme during construction.
	Traffic congestion	Whether or not the Scheme will have acceptable impacts on the local road network during construction.
	Permissive paths	Whether or not the permissive paths proposed within the Application are sufficient.
	Non-motorised users	The effect of the Scheme on non-motorised users of public rights of way (PRoW)
	Construction traffic	Whether or not the impacts of the Scheme in terms of construction traffic and the amenity, health and wellbeing of residents are acceptable.
Water Environment	Groundwater	Whether or not the Scheme will give rise to effects on groundwater, specifically in relation to surface water run-off.
	Lee Brook chalk stream	Whether or not the effects of the Scheme on Lee Brook Chalk stream are acceptable.
	Chalk streams	Whether or not the effects of the Scheme on chalk streams, specifically in relation to surface water run-off are acceptable.
	Drainage	Whether or not the effect of the Scheme on drainage patterns within the local area is acceptable.

Topic	Sub-topic	Details of Matters Under Discussion
	Flooding	Whether or not the effect of the Scheme on flooding within the local area is acceptable.
Noise and vibration	BESS operational noise	Whether or not the operational phase impacts of the BESS on noise levels are acceptable.
	Noise effects	Whether or not the effects of the Scheme by way of noise emissions, during both construction and operation are acceptable.
	Horses	Whether or not the noise effects of the Scheme on horses, during both construction and operation are acceptable.
Air quality	Construction related dust emissions	Whether or not the effects of the Scheme in terms of construction emissions are acceptable.
Cultural heritage	Archaeological record and surveys	Whether or not the impact of construction works on cultural heritage is acceptable and the completeness of archaeological surveys.
	Chippenham Park Gardens	Whether or not the effects of the Scheme on Chippenham Park Gardens are acceptable.
	WW2 crash site	The effects of the Scheme on the World War II crash site near the former RAF Snailwell base.
	Local heritage	The effects of the Scheme on local heritage.
	Historical/ listed buildings in Worlington	The effects of the Scheme on historical and listed buildings in Worlington.
	Icknield Way	Whether or not the effects of the Scheme on the Icknield Way are acceptable.
	PRoW closure and construction works	Whether or not potential impacts on buried archaeology due to the partial closure of U6006 and associated construction works as a result of the Scheme are acceptable.
Construction	Residents	Whether or not the Scheme gives rise to acceptable effects during construction on local residents.
	Local environment	Whether or not the Scheme gives rise to acceptable effects during construction on the local environment.
Decommissioning	Decommissioning fund	Whether or not a decommissioning fund or financial bond should be required as part of the Scheme.
	Extent of decommissioning	Whether the decommissioning proposals are sufficient.
	Scheme lifespan	Whether the solar farm and BESS are able to continue operation for the whole of the Scheme's lifespan.
	Farmland restoration	The timescales associated with decommissioning and compliance with the decommissioning environmental management plan.

Topic	Sub-topic	Details of Matters Under Discussion
	Restoration of land	Whether or not the mechanism to secure the decommissioning of the land subject to the Scheme at the end of its lifetime is appropriate.
	Recycling of solar panels	Whether or not the Application requires the recycling of solar panels at decommissioning.
	Removal of equipment	Whether or not the decommissioning environmental management plan is acceptable.

2.3 Matters Not Agreed

2.3.1 **Table 3** below details the matters not agreed with the Parish and Town Councils' Alliance.

Table 3: Matters not agreed

Topic	Sub-topic	Details of Matters Not Agreed
None	None	Discussions between the Parish and Town Councils' Alliance and the Applicant are ongoing.