



SUNNICA ENERGY FARM

EN010106

Volume 8

8.12 Statement of Commonality

Planning Act 2008

Infrastructure Planning (Examination Procedure) Rules 2010



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Planning Act 2008

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

Sunnica Energy Farm

Statement of Commonality

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1 Introduction

1.1 Overview of the Scheme

1.1.1 This Statement of Commonality 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 and Sunnica West Site A. 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) and cabling between the Sites and to the Burwell National Grid Substation;
- 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. Office/warehouse (Sunnica East Site A and Sunnica East Site B only);
- j. Fencing and security measures;
- k. Drainage;
- l. Internal access roads and car parking;
- m. Landscaping including habitat creation areas; and
- n. Construction laydown areas.

1.2 Purpose of the Statement of Commonality

1.2.1 This document provides the Examining Authority (ExA) with an update on the position of each Statement of Common Ground (SoCG) between the Applicant and the interested parties in relation to the Scheme at Deadline 7.

This document has been updated since Deadline 6 and will continue to be updated and submitted at the requested deadlines outlined in the Examination timetable for the Scheme.

1.3 Structure

1.3.1 This Statement of Commonality is structured as follows:

- a. Section 2: Summary of commonality of each topic covered – provides an overview of all topics covered and each stakeholder’s position.
- b. Section 3: Additional commentary for each SoCG submission deadline.

1.4 List of Statements of Common Ground

1.4.1 **Table 1-1** provides the list of SoCGs that have been prepared by the Applicant and the respective stakeholders in accordance with the list as requested by the Examining Authority in their letters issued on 28 June and 31 August 2022.

1.5 Summary of Current Position of SoCG

1.5.1 The updated SoCGs submitted alongside this document at Deadline 7 reflect the latest positions of the Applicant and stakeholders. For those SoCGs not updated and submitted at Deadline 7, please refer to the SoCGs submitted at Deadlines 2, 4 and 6.

1.5.2 **Table 1-1** provides an overview of the status of each SoCG.

Table 1-1 Status of SoCGs at Deadline 7

Party	Status at Deadline 2	Status at Deadline 4	Status at Deadline 6	Status at Deadline 7	Status at Deadline 8
Joint Local Planning Authorities	Draft submitted. Discussions ongoing.	Updated draft submitted. Discussions ongoing.	Updated draft submitted. Discussions ongoing.	No update since Deadline 6. Draft not submitted. Discussions ongoing.	
Environment Agency	Draft submitted. Discussions ongoing.	Updated draft submitted. SoCG agreed.	SoCG signed	SoCG signed.	
Natural England	Draft submitted. Discussions ongoing.	Updated draft submitted. Discussions ongoing.	Updated draft submitted. Discussions ongoing.	No update since Deadline 6. Draft not submitted. Discussions ongoing.	
Historic England	Draft submitted. Discussions ongoing.	Updated draft submitted. Discussions ongoing.	Updated draft submitted. Discussions ongoing.	Updated draft submitted. Discussions ongoing.	
National Highways	Draft submitted. SoCG agreed.		SoCG signed	SoCG signed.	
Suffolk Wildlife Trust	Draft submitted. Discussions ongoing.	Updated draft submitted. Discussions ongoing.	Updated draft submitted. Discussions ongoing.	No update since Deadline 6. Draft not submitted. Discussions ongoing.	

Party	Status at Deadline 2	Status at Deadline 4	Status at Deadline 6	Status at Deadline 7	Status at Deadline 8
National Grid Electricity Transmission plc	Draft submitted. Discussions ongoing.	Updated draft submitted. Discussions ongoing.	Updated draft submitted. Discussions ongoing.	No update since Deadline 6. Draft not submitted. Discussions ongoing.	
National Grid Gas plc	Draft submitted. Discussions ongoing.	Updated draft submitted. Discussions ongoing.	Updated draft submitted. Discussions ongoing.	No update since Deadline 6. Draft not submitted. Discussions ongoing.	
Chippenham Parish Council	Draft submitted. Discussions ongoing.	Draft submitted as part of the Town and Parish Council Alliance SoCG. Discussions ongoing.	No update since Deadline 4. Draft not submitted. Discussions ongoing.	See Town and Parish Council Alliance	
Burwell Parish Council	Draft submitted. Discussions ongoing.	No update since Deadline 2. Draft not submitted. Discussions ongoing.	No update since Deadline 2. Draft not submitted. Discussions ongoing.	SoCG signed.	
Red Lodge Parish Council	Draft submitted. Discussions ongoing.	Draft submitted as part of the Town and Parish Council Alliance SoCG. Discussions ongoing.	No update since Deadline 4. Draft not submitted. Discussions ongoing.	See Town and Parish Council Alliance	

Party	Status at Deadline 2	Status at Deadline 4	Status at Deadline 6	Status at Deadline 7	Status at Deadline 8
Fordham Parish Council	Draft submitted. Discussions ongoing.	Draft submitted as part of the Town and Parish Council Alliance SoCG. Discussions ongoing.	No update since Deadline 4. Draft not submitted. Discussions ongoing.	See Town and Parish Council Alliance	
Moulton Parish Council	Draft submitted. Discussions ongoing.	No update since Deadline 2. Draft not submitted. Discussions ongoing.	No update since Deadline 2. Draft not submitted. Discussions ongoing.	SoCG signed.	
Freckenham Parish Council	Draft submitted. Discussions ongoing.	Draft submitted as part of the Town and Parish Council Alliance SoCG. Discussions ongoing.	No update since Deadline 4. Draft not submitted. Discussions ongoing.	See Town and Parish Council Alliance	
Mildenhall High Town Council	Draft submitted. Discussions ongoing.	Draft submitted as part of the Town and Parish Council Alliance SoCG. Discussions ongoing.	No update since Deadline 4. Draft not submitted. Discussions ongoing.	See Town and Parish Council Alliance	
Worlington Parish Council	Draft submitted. Discussions ongoing.	Draft submitted as part of the Town and Parish Council Alliance SoCG. Discussions ongoing.	No update since Deadline 4. Draft not submitted. Discussions ongoing.	See Town and Parish Council Alliance	

Party	Status at Deadline 2	Status at Deadline 4	Status at Deadline 6	Status at Deadline 7	Status at Deadline 8
Snailwell Parish Council	Draft submitted. Discussions ongoing.	Draft submitted as part of the Town and Parish Council Alliance SoCG. Discussions ongoing.	No update since Deadline 4. Draft not submitted. Discussions ongoing.	See Town and Parish Council Alliance	
Isleham Parish Council	Draft submitted. Discussions ongoing.	Draft submitted as part of the Town and Parish Council Alliance SoCG. Discussions ongoing.	No update since Deadline 4. Draft not submitted. Discussions ongoing.	See Town and Parish Council Alliance	
Reach Parish Council	Draft submitted. Discussions ongoing.	Draft submitted as part of the Town and Parish Council Alliance SoCG. Discussions ongoing.	No update since Deadline 4. Draft not submitted. Discussions ongoing.	See Town and Parish Council Alliance	
Ministry of Defence	Draft submitted. Discussions ongoing.	No update since Deadline 2. Draft not submitted. Discussions ongoing.	No update since Deadline 2. Draft not submitted. Discussions ongoing.	No update since Deadline 2. Draft not submitted. Discussions ongoing.	
National Air Traffic Services	Draft submitted. SoCG agreed.		SoCG signed.	SoCG signed.	
East of England Ambulance Service	Draft submitted. Discussions ongoing.	Updated draft submitted. SoCG agreed.	SoCG signed.	SoCG signed.	

Party	Status at Deadline 2	Status at Deadline 4	Status at Deadline 6	Status at Deadline 7	Status at Deadline 8
Say no to Sunnica and Newmarket Horsemen	Draft submitted. Discussions ongoing	No update since Deadline 2. Draft not submitted. Discussions ongoing.	No update since Deadline 2. Draft not submitted. Discussions ongoing.	Draft not submitted. Discussions ongoing.	
Anglian Water	Draft submitted. Discussions ongoing	Updated draft submitted. SoCG agreed.	No update since Deadline 4. Draft not submitted. Discussions ongoing.	Draft not submitted. Discussions ongoing.	
Kennett Parish Council	Draft submitted. Discussions ongoing	No update since Deadline 2. Draft not submitted. Discussions ongoing.	No update since Deadline 2. Draft not submitted. Discussions ongoing.	No update since Deadline 2. Draft not submitted. Discussions ongoing.	
Barton Mills Parish Council	Draft submitted. Discussions ongoing	No update since Deadline 2. Draft not submitted. Discussions ongoing.	Updated draft submitted. Signature pending.	SoCG signed.	
Wicken Parish Council	Draft submitted. Discussions ongoing	No update since Deadline 2. Draft not submitted. Discussions ongoing.	No update since Deadline 2. Draft not submitted. Discussions ongoing.	No update since Deadline 2. Draft not submitted. Discussions ongoing.	
West Row Parish Council	Draft submitted. Discussions ongoing	No update since Deadline 2. Draft not submitted.	No update since Deadline 2. Draft not submitted.	See Town and Parish Council Alliance	

Party	Status at Deadline 2	Status at Deadline 4	Status at Deadline 6	Status at Deadline 7	Status at Deadline 8
		Discussions ongoing.	Discussions ongoing.		
Newmarket Town Council	Draft submitted. Discussions ongoing	Draft submitted as part of the Town and Parish Council Alliance SoCG. Discussions ongoing.	No update since Deadline 4. Draft not submitted. Discussions ongoing.	See Town and Parish Council Alliance	
Exning Parish Council		Draft submitted as part of the Town and Parish Council Alliance SoCG. Discussions ongoing.	No update since Deadline 4. Draft not submitted. Discussions ongoing.	See Town and Parish Council Alliance	
Town and Parish Council Alliance		Draft submitted. Discussions ongoing.	No update since Deadline 4. Draft not submitted. Discussions ongoing.	Draft not submitted. Discussions ongoing.	

2 Summary of Commonality of Each Topic Covered

2.1.1 **Table 2-1** presents a summary of commonality at Deadline 6, on each topic discussed between the Applicant and stakeholder using the following colour coding:

■	Matter agreed
■	Matter under discussion
■	Matter not agreed
■	Topic not relevant to the stakeholder

Table 2-1 Summary of Commonality with each party in relation to each topic covered at Deadline 7

Party	Protected Provisions	Design	Climate	Cultural Heritage	Ecology and Natural Conservation	Flood Risk, Drainage and Water Resources	Landscape and Visual Amenity	Noise and Vibration	Socio-economics and Land Use (including soils)	Transport and Access	Air Quality	Human Health	Glint and Glare	Effect Interactions / Cumulative Effects	Legislation and Policy	Compulsory Acquisition	Draft DCO
Joint Local Planning Authorities			Green	Yellow	Yellow	Green	Yellow	Yellow	Yellow	Yellow	Green	Green		Yellow	Green		
Environment Agency						Green									Green		
Natural England			Green		Yellow		Yellow		Yellow					Green	Green		
Historic England				Green										Green	Green		
National Highways	Green									Green					Green		
Suffolk Wildlife Trust					Yellow	Green	Yellow										
National Grid Electricity Transmission plc	Yellow	Green															Green
National Grid Gas plc	Yellow																
Burwell Parish Council										Green							
Moulton Parish Council		Red	Green	Red	Red			Red	Red	Red		Red					
Ministry of Defence							Green					Green	Green				
National Air Traffic Services													Green				
East of England Ambulance Service											Green						
Say no to Sunnica and Newmarket Horseman		Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow		Yellow	Yellow	Yellow	Yellow	Yellow	Yellow
Anglian Water	Green																
Kennett Parish Council		Yellow	Yellow				Yellow		Yellow			Yellow					
Barton Mills Parish Council		Red	Green														
Wicken Parish Council																	
Town and Parish Council Alliance		Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow			Yellow	Yellow	

3 Additional Commentary

3.1 Deadline 2

- 3.1.1 Since issue by the ExA of the letters dated 28 June and 31 August 2022:
- a. A joint SoCG has been prepared for Cambridgeshire County Council, Suffolk County Council, East Cambridgeshire District Council and West Suffolk Council in line with the joint meetings with the Local Planning Authorities.
 - b. Natural England and Suffolk Wildlife Trust both agreed to enter into separate SoCGs with the Applicant.
 - c. The Newmarket Horsemen Group agreed to enter into a joint SoCG with the Say No To Sunnica Action Group (SNTS).
 - d. RSPB contacted the Applicant and raised that they were not registered as Interested Parties to the Examination so would not be able to act as signatories to an SoCG.
 - e. National Grid SoCG has been split into separate SoCGs for National Grid Electricity Transmission plc and National Grid Gas plc.
 - f. A number of other parties have come forward requesting input to SoCGs including: Isleham Parish Council, Reach Parish Council, Anglian Water, Kennett Parish Council, Barton Mills Parish Council, Wicken Parish Council, West Row Parish Council and Newmarket Town Council.
- 3.1.2 The following stakeholders had not provided comments on their corresponding SoCGs ahead of Deadline 2:
- a. Chippenham Parish Council
 - b. Burwell Parish Council
 - c. Red Lodge Parish Council
 - d. Fordham Parish Council
 - e. Freckenham Parish Council
 - f. Mildenhall High Town Council
 - g. Worlington Parish Council
 - h. Snailwell Parish Council
 - i. Isleham Parish Council
 - j. Reach Parish Council
 - k. Ministry of Defence
 - l. SNTS and Newmarket Horseman Group
 - m. Anglian Water
 - n. Kennett Parish Council
 - o. Barton Mills Parish Council
 - p. Wicken Parish Council

- q. West Row Parish Council.

3.2 Deadline 4

3.2.1 At Deadline 4, the following parties joined to form a Town and Parish Council Alliance, and as such a combined SoCG was produced:

- a. Chippenham Parish Council
- b. Red Lodge Parish Council
- c. Fordham Parish Council
- d. Freckenham Parish Council
- e. Mildenhall High Town Council
- f. Worlington Parish Council
- g. Snailwell Parish Council
- h. Isleham Parish Council
- i. Newmarket Town Council
- j. Reach Parish Council
- k. Exning Parish Council.

3.2.2 The SoCGs submitted at Deadline 2 for the following stakeholders had already been agreed and therefore were not resubmitted at Deadline 4:

- a. National Highways
- b. National Air Traffic Services

3.2.3 The Applicant continued engagement with the following stakeholders, however they had not yet provided comments on the SoCGs submitted at Deadline 2. These SoCGs therefore remained under revision or unchanged and so were not resubmitted at Deadline 4:

- a. Burwell Parish Council
- b. Kennett Parish Council
- c. Moulton Parish Council
- d. Barton Mills Parish Council
- e. Wicken Parish Council
- f. West Row Parish Council
- g. Say No To Sunnica and Newmarket Horsemen
- h. Ministry of Defence.

3.3 Deadline 6

3.3.1 At Deadline 6, the following SoCGs were finalised and signed by both parties:

- a. Environment Agency

- b. National Highways
- c. East of England Ambulance Service
- d. National Air Traffic Services

3.3.2 Discussions with the Joint Local Planning Authorities, Historic England, Natural England, Suffolk Wildlife Trust, National Grid Electricity Transmission plc and National Grid Gas plc, Barton Mills Parish Council are ongoing, and the content of these SoCGs will be finalised and signed at Deadline 8.

3.3.3 The Applicant continued to engage with the following stakeholders, however changes had not yet been made to the corresponding SoCGs previously submitted. These SoCGs therefore remained under revision or unchanged and were not resubmitted at Deadline 6:

- a. Burwell Parish Council
- b. Kennett Parish Council
- c. Moulton Parish Council
- d. Wicken Parish Council
- e. West Row Parish Council
- f. Parish and Town Council Alliance
- g. Say No To Sunnica and Newmarket Horsemen
- h. Ministry of Defence
- i. Anglian Water

3.4 Deadline 7

3.4.1 The following SoCGs were finalised and signed by both parties at Deadline 7:

- a. Barton Mills Parish Council
- b. Burwell Parish Council
- c. Moulton Parish Council

3.4.2 Since issuing the draft SoCGs to Kennett Parish Council and Wicken Parish Council on 1st November 2022, the Applicant has not received a response. The Applicant followed up with the parish councils on the 7th December 2022, 19th January 2023 and most recently on the 22nd February 2023.

3.4.3 The Applicant continued to engage with the following stakeholders, however changes had not yet been made to the corresponding SoCGs previously submitted. These SoCGs therefore remained under revision or unchanged and were not resubmitted at Deadline 7:

- a. Joint Local Planning Authorities
- b. Natural England
- c. Suffolk Wildlife Trust
- d. National Grid Electricity Transmission plc

- e. National Grid Gas plc
- f. Parish and Town Council Alliance
- g. Say No To Sunnica and Newmarket Horsemen
- h. Ministry of Defence
- i. Anglian Water