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To Sunnica

By email: [info@sunnica.co.uk](mailto:info@sunnica.co.uk)

Dear Sirs,

### **Sunnica Energy Farm - Consultation on proposed changes**

This letter is the joint response of West Suffolk Council, Suffolk County Council, East Cambridgeshire District Council and Cambridgeshire County Council (referred to as "the Councils" in this response) to Sunnica's consultation on proposed changes to the Sunnica Energy Farm scheme. Unless it is identified otherwise in specific sections, the Councils share the views on matters within this response.

#### General points

The consultation material states that Sunnica believes that the proposed changes are 'non-material and will reduce environmental effects from the scheme'. The Councils consider that insufficient information has been presented at this stage to establish whether the proposed changes are material or non-material. Sunnica correctly state that this is a matter for the Examining Authority to decide and the Councils concur with this view.

In general, the Councils consider that insufficient information has been provided as to the nature of the changes and their resultant impacts. The use of technical jargon and references to items such as shunt reactors and busbars does not aid the reader to understand what the implications of their inclusion in the scheme are.

The consultation material does not categorically state whether Option 3 is technically feasible. The Councils question whether further consultation will be necessary once this has been established.

The consultation material does not provide any information in relation to any changes that will be required to the framework control documents that accompanied the application as a result of the changes to the scheme. The Councils require this information in order to be able to fully consider the changes.

The Councils wish it to be noted that the matters raised in their respective Relevant Representations submitted in March 2022 remain valid and that there are no changes to them as a result of this consultation.

### Highway matters

It is unclear what impact the changes will have on haulage routes. For example, will the changes to the substations at Sunnica West A, Sunnica East A and Sunnica East B require additional and/or larger equipment to be delivered to site than would have been expected under the original scheme? If so, how will this be facilitated. Equally is there any additional maintenance and associated journeys to the above sites during operation?

### Landscape and visual impact

The consultation material indicates that while there is additional infrastructure proposed at the substations at Sunnica West A, Sunnica East A and Sunnica East B, the substations would not be any larger than already proposed. On this basis the landscape and visual effects and the requirements for mitigative and compensatory planting would be unchanged. However, as previously stated, the Councils consider that further information is required to fully understand the impacts (if any) of the proposed changes and as such the Councils may reach a different view.

From the information provided it is not clear what the implications of changes to the cables (moving from 4 x 137kV cables to a single 400kV) would be in terms of the trenches. Without details of the footprint and depth of the trenches the Councils are unable to assess the impact this might have on loss of vegetation as a consequence. The Councils have previously highlighted that the information on loss of trees and hedges in relation to the cable route is insufficient within the application.

### Ecology

There is insufficient evidence to determine whether the changes proposed under Option 3 are "non material and will reduce environmental effects from the scheme" as stated by the applicant. If a modified application is submitted, we expect adequate evidence to demonstrate this will be the case, and that all documents to be updated accordingly (including EcIA, landscape plans, CEMP and LEMP etc.). For example, there are concerns relating to the cable route and hydrological implications, such as at Chippenham Fen, and directional drilling beneath the water courses associated with Havacre Deal and Nook CWS.

It is not clear from the information available whether changes associated with the onsite substations may result in increases to staffing, noise, traffic and other disturbance. We would therefore expect adequate evidence to demonstrate the proposed changes will not alter the magnitude of impact / significance of effect

of the scheme on biodiversity including on Stone Curlews as set out in Chapter 8 of the Environmental Statement [APP-040].

### Noise and vibration

With reference to the Pinsent Masons letter of 28 April 2022 to the Examining Authority, it is stated at Para 3.7 ".....We do not expect there to be any adverse effects on the environment beyond those identified in the Application already.....". Para 3.13 states "The need for additional baseline surveys: None."

To date the Councils have not been satisfied by the information provided by Sunnica regarding either the baseline noise assessments or the assessment of adverse amenity impacts during the operational phase. There is therefore no confidence in the above statements.

The consultation material indicates a change to the electrical infrastructure due to the introduction of 33/400kV transformers at substation locations within Sunnica East Site A and Sunnica East Site B and Sunnica West Site A and the proposal for the installation of a shunt reactor at Sunnica East Site B.

To date no specific information has been provided by Sunnica regarding assessments of noise and vibration from these substations/transformers. Particularly, but not exclusively, the Councils are concerned that during operation shunt reactors are liable to relatively high sound levels at low frequencies. It will be necessary for information to be provided regarding the specification, design, sound mitigation and exact locations of all substation equipment (including the proposed shunt reactor) and reports by competent and suitably qualified parties regarding the effects on receptors and necessary mitigation measures.

### Consultation process

In its letter of 26 May 2022 the ExA suggested that Sunnica consider holding a public meeting as part of the consultation. Two 'public exhibition' events have been proposed by Sunnica, however, both are located in Cambridgeshire despite the changes also affecting sites in Suffolk. A public exhibition differs from an open public meeting, which is likely to attract a higher level of participation.

Sunnica communication consultants, SEC Newgate UK Ltd, contacted the Councils and provided a copy of the exhibition invite letter. In their communication it was stated that the letter was being posted to the same zone that received booklets during the statutory consultation. However, Sunnica's Method Statement for this consultation states that Sunnica will be writing to approximately 140 homes and businesses. There appears to be a significant difference between the two geographic areas that have been written to. This is likely to have led to confusion in the community.

Regards,

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