



SUNNICA ENERGY FARM

EN010106

Volume 8

8.52 Update by the Applicant on Heritage Matters and Substation
Connection

Planning Act 2008

Infrastructure Planning (Applications: Prescribed Forms and
Procedure) Regulations 2009



Planning Act 2008

**The Infrastructure Planning
(Applications: Prescribed Forms and
Procedure) Regulations 2009**

**Sunnica Energy Farm
Development Consent Order 202[x]**

**8.52 Update by the Applicant on Heritage Matters and Substation
Connection**

| | |
|---|----------------------------------|
| Planning Inspectorate Scheme Reference | EN010106 |
| Application Document Reference | EN010106/APP/8.52 |
| Author | Sunnica Energy Farm Project Team |

| Version | Date | Status of Version |
|----------------|------------------|--------------------------|
| Rev 00 | 28 November 2022 | Deadline 3A Submission |

Table of contents

| Chapter | Pages |
|--|--------------|
| 1 Introduction | 4 |
| 2 Burwell Substation Connection | 4 |
| 3 Sunnica West B and Archaeology | 4 |
| 4 B-50 Bomber Crash Site at Isleham | 7 |
| 5 W04-North – Additional Archaeological Protection Area | 10 |
| 6 Changes Application | 11 |
| Appendix A Plan A: Crash Site Exclusion Area | 15 |
| Appendix B Plan B: Potential Expanded Crash Site Exclusion Area | 16 |
| Appendix C Plan C: Area to be excluded from W-04 | 17 |

1 Introduction

- 1.1.1 This note provides an update, in advance of the forthcoming Hearings, on four key issues that have been the subject of discussion during the Examination to date:
- a. the substation connection at Burwell;
 - b. the impacts of the Scheme on an area of potential archaeological importance at Snailwell (namely a Roman villa);
 - c. potential impacts to the B-50 bomber crash site close to Isleham; and
 - d. archaeological mitigation at field W04 (as shown numbered on the Parameters Plan [APP-136]) of the Scheme.
- 1.1.2 This note is submitted to help inform discussions at the forthcoming Hearings and to assist the Examining Authority (“ExA”) in shaping the agenda for those hearings.

2 Burwell Substation Connection

- 2.1.1 Following the acceptance of ‘Option 3’ into the Examination (i.e. a 400kv connection), the Applicant has been continuing to work with National Grid to enable it to be confident that this can be taken forward as the sole option for connecting to the National Electricity Transmission System at Burwell.
- 2.1.2 In light of those discussions with National Grid, and having taken advice on the terms of the Grid Connection Agreement securing its grid connection at Burwell, the Applicant is now in a position that it considers that this can be the case. As such, Option 2 in the Application (being a substation extension on third party land) can be discontinued.
- 2.1.3 In light of this, the Applicant will be bringing forward a change to the Application to account for the removal of Option 2. This will include in particular removing Work Number 5B and powers of compulsory acquisition of the freehold over the third party land, although retaining powers for the compulsory acquisition of rights to enable cabling to pass through that land to connect to Burwell.
- 2.1.4 This change will be brought forward as part of the same Change Application discussed in section 6 of this note.

3 Sunnica West B and Archaeology

- 3.1.1 The ExA would have noted the comments of the local planning authorities (“LPAs”) within the Local Impact Report as to their concerns over the impacts of the Scheme in the area of field W01 (as shown numbered on the Parameters Plan [APP-136]) within Sunnica West Site B.
- 3.1.2 In summary the LPAs have raised concerns that:
- a. the development would result in harm to the historic settings of the scheduled Roman Villa to the south west of Sunnica West B, and the non-designated, associated, contemporary settlement in the fields to the north of W01 (CCC WR Paragraph 2.8) that had already been removed from the Scheme; and

- b. the development would result in physical harm to non-designated buried assets associated with the Roman villa and settlement and through desiccation of deposits containing well preserved archaeological remains within the floodplain (CCC WR 2.7).
- 3.1.3 Following consideration of the LPAs' submissions, and further consideration of the impacts of the Scheme on the known Roman villa and its setting, the Applicant is of the view that it is appropriate for field W01 to be removed from the Scheme, on the basis that:
 - a. the development would impact the integrated historic setting of the Roman Villa and associated settlement. Suitable mitigation to reduce that impact on the historic setting of both areas through screening may not be possible; and
 - b. the development would impact buried deposits of archaeological significance. Costs to further evaluate and mitigate the impact upon potential waterlogged remains in the floodplain would be prohibitive in the wider context of the Scheme's costs.
- 3.1.4 The Applicant acknowledges that the LPAs and other Interested Parties have requested that other parts of the Scheme are also removed (e.g., field E05 and Sunnica West A) for different reasons. The Applicant considers that there is no justification in removing any other parts of the Scheme.
- 3.1.5 The Applicant considers that the position at field W01 is different, and that it is appropriate for it to be removed, as it is likely that the villa and the newly discovered settlement and waterlogged remains within the intervening floodplain of W01 are part of an integrated archaeological landscape of high significance. The Applicant's evaluation has revealed this rare archaeological survival for the first time. The difficulties of mitigating archaeological impact within W01 notwithstanding, the Applicant also wishes to contribute to the preservation of this unique landscape for future generations by omitting it from development.
- 3.1.6 The Applicant has, in its responses to Written Representations (e.g. Cambridgeshire County Council and East Cambridgeshire Council), explained why it is not necessary for other sites to be removed.
- 3.1.7 As a result of the removal of field W01, the Applicant has considered the appropriateness of bringing forward development at Sunnica West Site B with only field W02 being able to be developed for solar (in light of the other mitigation requirements that make up the rest of the site).
- 3.1.8 This consideration has been mindful of the principles of site selection and development set out in Chapter 4 of the ES [APP-036] and Appendix 4A: Alternative Sites Assessment [APP-054], where it was identified that the minimum area for large scale solar to be economically viable is at least 38 hectares of contiguous land. The developable area of field W02 by itself is only 12.6 hectares.
- 3.1.9 As such, and in order to be consistent with the approach to development for the Scheme, the Applicant considers that it is not appropriate for field W02 to be developed for solar in isolation.
- 3.1.10 As a consequence, the Applicant has therefore determined that the whole of Sunnica West B should be removed from the Scheme as a site proposed for solar development (and its associated mitigation).

- 3.1.11 The Applicant therefore proposes to bring forward a Changes Application to amend the Application to remove of Sunnica West B. This Changes Application would seek to remove land and works powers for above ground solar elements, and mitigation. However, it should be noted that land that forms part of Sunnica West B would not be removed entirely from the Order limits – some land will still be required for the underground Grid Connection cable route which runs through to the site, and access to that cable route. The Changes Application would therefore clarify which land would be kept in the Order limits to facilitate those uses. To be clear, what is known as Sunnica West B would be removed, but a cable corridor would still be required.
- 3.1.12 The Applicant recognises that some Interested Parties may seek to argue that the removal of West Site B for solar energy generation should mean that the route of Cable Corridor B should be looked at again. However, the Applicant considers that the route is still appropriate because the rationale for selecting this route as the most appropriate available option still remains. This is set out in paragraph 4.8 of Chapter 4 of the Environmental Statement [APP-036]. The Applicant has determined this route to be the most suitable based on:
- a. the agricultural land to the north being constrained by the Brackland Rough SSSI designation;
 - b. the agricultural land to the east being constrained by multiple ecological designations including Ramsar (European), National Nature Reserves and Special Areas of Conservation;
 - c. the agricultural land east of Snailwell Road/A142 Roundabout being constrained by a known Scheduled Monument, and;
 - d. the A142 being an area already heavily utilised for services. This area will also be required for services to the developments to be located in the adjacent employment zone
- 3.1.13 This proposed change can be discussed further in the Hearings in the week commencing 5 December 2022 and will be set out fully in the proposed Changes Application.
- 3.1.14 In light of the submissions of Interested Parties to date, and the ExA's First Written Questions, the Applicant is aware that there will be immediate questions as to what the removal of West Site B means for the Scheme's position on:
- a. the power generation created by the Scheme;
 - b. the carbon costs and savings derived from the Scheme;
 - c. the need for the rest of the Scheme to be the size that it is; and
 - d. whether this would change the size and location of BESS for the Scheme.
- 3.1.15 The Applicant's position on these matters (which can be explored further in the Hearings) is set out below:
- a. The power generation created by the Scheme would be reduced by the total of the two fields with the current estimate being W01 - 9,763,600 Wp and W02 - 13,090,000 Wp assuming that a 550W panel were to be used. This loss could be mitigated through the adoption of a 575W panel across the entire scheme such that the overall output would remain relatively unchanged. The 575W panel will conform with the maximum and minimum parameters as set out in

Appendix B-1 of the Design and Access Statement [AS-312] for Work No.1. Therefore, the assessments presented in the technical chapters, Chapters 6 to 16 [APP-038 to APP-048], of the Environmental Statement remain valid with this change in panel size.

- b. The carbon costs would potentially be reduced with less materials used and the carbon savings derived from the Scheme would be estimated to remain the same as these are relative to the level of electricity produced, which, further to the previous point, would remain the same. Carbon costs and savings are explored further in the Applicant's response to Cranfield University's report on carbon emissions [REP2-240g] also submitted at Deadline 3A.
- c. The need for the rest of the scheme to be the size that it is now increases as the ability to increase the panel format or efficiency and make up for further production output is reduced.
- d. This would not change the size and location of the BESS for the Scheme as the power and energy outputs would remain proportionate.

3.1.16 Finally, the Applicant recognises that removing Sunnica West B will also change its BNG assessment (both in terms of losses and habitats created as part of the overall picture for the Scheme as a whole); and so, would propose to update that assessment if this change was accepted into the Examination.

4 B-50 Bomber Crash Site at Isleham

- 4.1.1 Further to the Applicant's responses to the Local Impact Report [REP3-019] and its responses to Written Representations and other Interested Party submissions at this Deadline, the Applicant has been liaising with Cambridgeshire County Council and the Ministry of Defence's Joint Casualty and Compassionate Centre ("JCCC") to consider the appropriate approach to the existence of the aircraft remains at Isleham.
- 4.1.2 As a starting point, the Applicant recognises the sensitivity of the site, and its importance to the local history of the area.
- 4.1.3 The Applicant's geophysical survey has confirmed the exact location of the crash impact crater. Although the approximate location of the crash has long been known to a few members of the local community, accurately confirming the location is a beneficial outcome as it contributes important information to the Historic Environment Record. Further research into the crash by the Applicant, including a review of the War Department's official report, confirms that the aircraft was 'completely destroyed' mainly due to the ignition of ordnance, probably during the final seconds of flight. Photographs taken in the immediate aftermath of the crash strongly suggest that the recovery operation would have been extremely thorough and it is the Applicant's view that no significant remains of the aircraft or remains of the crew exist at the site. The geophysical survey also supports the absence of any buried wreckage.
- 4.1.4 In light of this, the Applicant acknowledges that the Scheme is an opportunity for the history of this crash to be recognised. As such, the Applicant is prepared to fund the installation of a commemorative plaque and interpretation board, at an appropriate publicly accessible location relative to the crash site, to highlight this crash site and to explain its history. Such an interpretation board and plaque will

need to be installed on public land (such as highway or public right of way) as the Applicant will not have control of the Scheme land once the Scheme is decommissioned.

- 4.1.5 The details of this interpretation board (including its location and content) will need to be discussed with Cambridgeshire County Council as part of the detailed design of the Scheme. It is considered that such an interpretation board should be installed prior to the operational phase of the Scheme as the 'interpretation' would be difficult to achieve during construction.
- 4.1.6 The Applicant is therefore proposing for this matter to be secured by DCO Requirement, as discussed below.
- 4.1.7 Whilst the Applicant recognises the crash site history, it does not consider that the existence of the crash site itself should necessarily mean that this part of the Scheme is not developed out for renewable energy; not least given that this crash site has been in existence for decades and no efforts have been previously made to formally recognise it and with the site being actively farmed.
- 4.1.8 The backfilled impact crater represents the only direct physical evidence of the crash site but due to the nature of the incident, it does not necessarily mark the location where all of the crew were fatally injured. There is no doubt that the remains of the aircraft and crew were recovered as thoroughly as possible by the United States Airforce and the geophysical survey supports that there are no significant remains existing at the site. The crash site itself does not contain any information that enhances the significance of the event.
- 4.1.9 The Applicant agrees that the crash crater is an important location and the immediate area over the crater should be excluded from development. The exclusion zone over the crater would be to preserve a physical, though not visible, feature relating to the tragedy. The exclusion zone could also be subtly marked as part of the development design to be locatable when viewing from the proposed information board and commemorative plaque. Development of arrays around the exclusion zone will not impact the significance of the event or the location.
- 4.1.10 The development would provide a beneficial outcome by adding important information to the Historic Environment Record and providing an opportunity to enhance the understanding and appreciation of the tragic event through an information board and plaque in an appropriate location off site.
- 4.1.11 However, the Applicant is also cognisant of the legal requirements of the Protection of Military Remains Act 1986 ("the Act"). The Act makes it an offence to tamper with, damage, move, remove, or unearthen remains such as those that have the potential to exist at the B-050 bomber crash site, unless a licence is obtained from the JCCC (on the Secretary of State's behalf).
- 4.1.12 Whilst the Applicant considers it is highly unlikely that the works to create the solar panels will mean that the remains are tampered with, damaged, or unearthened, it is now in the process of applying for a licence from the JCCC to ensure that it will not be in breach of the Act at the crash site.
- 4.1.13 If a licence is obtained, then the Applicant will be able to build out the Scheme in the area of the crash site (aside from the area agreed to be excluded discussed above). If it is not able to be obtained, then the Applicant will not be able to do so.

The Applicant considers it appropriate that the JCCC, as the Government's responsible body for the consideration of military remains and war graves, should be the determining body as to whether works in the area of the aircraft remains should be able to take place.

4.1.14 In light of all of the above and to capture the commitments that the Applicant is willing to make, the Applicant is therefore proposing that the following Requirement be added to the next iteration of the draft DCO:

- (1) No part of the authorised development may take place within the crash site exclusion area.*
- (2) Work No. 1A must not commence until the undertaker has confirmed to Cambridgeshire County Council that either-*
 - (a) a licence under the Protection of Military Remains Act 1986 has been obtained in respect of the carrying out of Work No. 1A within the potential expanded crash site exclusion area; or*
 - e. *(b) a licence under the Protection of Military Remains Act 1986 has not been obtained in respect of the carrying out of Work No. 1A and that therefore no part of the authorised development will take place within the potential expanded crash site exclusion area.*
- (3) If the undertaker makes a confirmation under sub-paragraph (b) then no part of the authorised development shall take place within the potential expanded crash site exclusion area.*
- (4) The date of final commissioning of Work No. 1A must not take place until a bomber crash site interpretation scheme has been submitted to and, following consultation with Isleham Parish Council, approved by Cambridgeshire County Council, and the undertaker has carried out the bomber site crash site interpretation scheme.*
- (5) For the purposes of this paragraph 'bomber crash site interpretation scheme' means a scheme setting out the location (which must be on a highway), design and content of an interpretation board and commemorative plaque relating to the history of the bomber crash that took place within the limits of deviation of Work No. 1A in October 1949.*

4.1.15 The 'crash site exclusion area' is the immediate area over the crater referred to in paragraph 4.1.9 which is excluded in all circumstances. That is shown on Plan A to this note, which will be certified by the DCO, and is a 50m box encompassing the area formed by the crash crater.

4.1.16 The 'potential expanded crash site exclusion area' referred to in that draft Requirement is the area set out in Plan B to this note. This area would be within a 100m radius from centre point of the crash site (the crater), which is an area consistent with the area that JCCC's licenses seek to protect.

4.1.17 If the "potential expanded exclusion area" was to be removed from the Scheme, it would mean the following in respect of the questions asked at paragraph 3.1.14:

- a. the power generation created by the Scheme would be reduced by the total of the area within the 100m radius from the centre point which is approximately 3.14 Ha. Therefore, an estimate of approximately 3.1MWp of installed capacity solar PV would be removed from the overall installed capacity of the Scheme.

- b. the carbon costs would potentially be reduced with less materials used and the carbon savings derived from the Scheme would be estimated to be slightly lower reduced by approximately 3.1MWp installed capacity solar PV. Carbon costs and savings are explored further in the Applicant's response to Cranfield University's report on carbon emissions [REP2-240g] also submitted at Deadline 3A.
 - c. the need for the rest of the scheme to be the size that it is now increases as the ability to increase the panel format or efficiency and make up for further production output is reduced.
 - d. this would not change the size and location of the BESS for the Scheme as the power and energy outputs would remain proportionate.
- 4.1.18 With this Requirement in place, the Applicant considers that matters relating to the bomber crash site do not need to be incorporated within the Detailed Archaeological Mitigation Strategy that is currently being discussed with the local planning authorities; meaning discussions with that document can continue, whilst the Examination considers the wording of this proposed Requirement.
- 4.1.19 Furthermore, as the process of whether or not the "potential expanded crash site exclusion area" will need to be invoked will follow post consent and as a consequence of a separate consent, it is not considered that this area is a "change" that requires to be part of the Changes Application discussed below.
- 4.1.20 The removal of the "crash site exclusion area" will, however, form part of the Changes Application discussed below as that is a commitment the Applicant is willing to give now.

5 W04-North – Additional Archaeological Protection Area

- 5.1.1 The results of geophysical survey in the northern part of W04 indicate an area of concentrated archaeological features that represent an extension to the area already proposed for archaeological preservation to the immediate West of W04. Although it has not been highlighted in the RR or LIR, Cambridgeshire Council Historic Environment Team ("CCHET") have recommended in previous consultation meetings that this area to be omitted from the development.
- 5.1.2 The Applicant is willing to exclude (via changes to the Works Plans and for the purposes of this note appended at Plan C) an area encompassing the concentration of features in the north of W04 as the remains are likely to be associated with settlement features in the area excluded from development to the immediate west. The Applicant agrees that preserving the concentration of settlement features in the north of W04 in situ would be appropriate on archaeological grounds.
- 5.1.3 If this area was to be removed from the Scheme, it would mean the following in respect of the questions asked at paragraph 3.1.14:
- a. the power generation created by the Scheme would be reduced by the total of the area within the extended mitigation area which is approximately 2.39 Ha. Therefore, an estimate of approximately 2.4MWp installed capacity solar PV would be removed from the overall installed capacity of the Scheme.

- b. the carbon costs would be potentially be reduced with less materials used and the carbon savings derived from the Scheme would be estimated to be slightly lower reduced by approximately 2.4MWp installed capacity solar PV. Carbon costs and savings are explored further in the Applicant's response to Cranfield University's report on carbon emissions [REP2-240g] also submitted at Deadline 3A.
- c. the need for the rest of the scheme to be the size that it is now increases as the ability to increase the panel format or efficiency and make up for further production output is reduced.
- d. this would not change the size and location of the BESS for the Scheme as the power and energy outputs would remain proportionate.

5.1.4 The management of this additional archaeological protection area in W04 will be included in the HEMP section of an updated Landscape and Ecological Management Plan which will be submitted to the Examination in due course, following the issuing of a brief from CCHET, which will take account of this decision.

5.1.5 It is important to note that there will still be a need for the cable route corridor to traverse along the northern boundary of W04 to the north of the additional area of protection. Mitigation for the resulting archaeological impact will be agreed with CCHET and included in the DAMS.

6 Changes Application

6.1.1 As a result of the matters discussed in sections 2 to 5 of this note, the Applicant intends to make a Changes Application into the Examination.

6.1.2 Subject to the matters discussed below, it is intended that this application would be submitted at Deadline 5 (13 January 2023), following preparation of the Changes Application document which would include:

- a. before and after/track changed (as appropriate to the relevant document) extracts of the key documents that will change as a result of the matters discussed in sections 2 to 5 of this note;
- b. a schedule setting out the full list of documents that would change as a result of the proposed changes; and
- c. environmental appraisals relating to the changes, confirming that there is no material change to the results of the Environmental Statement, that there are no changes to the conclusions of the HRA, and confirming that no separate EPS licences will be required.

6.1.3 It is the Applicant's initial view that the changes will lead to the conclusions set out in paragraph 6.1.2(c) as the Scheme would essentially be removing potential adverse impacts and returning them to neutral (by there being no development at all). There would therefore be a beneficial impact (but not so great as to be new significant positive impacts of the Scheme). In particular:

- a. the changes would remove archaeological impacts, including potentially significant ones at Sunnica West Site B;
- b. the change to remove Sunnica West Site B would alleviate concerns (albeit not shared by the Applicant) of ecological stakeholders in respect of impacts to

aquatic invertebrates from the adjacent SSSI and SAC and construction impacts more generally. It would also mean that stakeholder concerns as to the impact of the Scheme on the ability to achieve Cambridgeshire's Nature Recovery Plan's aspiration to join up Chippenham Fen and Snailwell Poor's Fen SSSI with Snailwell Meadows SSSI would be alleviated;

- c. impacts to hedges and trees arising from works required to facilitate access to the West Site B would no longer be needed, including avoiding impacts to a Category A veteran tree;
- d. landscape impacts at construction and year 1 of operation, arising from Sunnica West B, would be removed; and
- e. visual impacts from Snailwell (including construction and year 1 impacts to users of PRoW 204/1) and at Burwell would be removed.

6.1.4 The Applicant considers that if the Changes Application was submitted on Deadline 5, this could be catered for with only a small amount of impact to the Examination timetable as it currently stands:

- a. the Applicant would suggest that the ExA's second written questions are moved from 5 January 2023 to 20 January 2023. This is on the basis that the questions would have been written by 5 January 2023, allowing time for the ExA to use this time to focus additional/changes to questions on the basis of the Changes Application;
- b. responses to Second Written Questions could be moved to Deadline 6 (30 January 2023) from 13 January 2023. This would give all parties a very similar time period to respond to those questions as is currently provided for in the Examination timetable; and
- c. this would allow for matters to be explored in the Hearings currently programmed for week commencing 13th February 2023, including with regard to preparing an agenda for those Hearings (noting that given the submission of this letter, the principle of the changes would already have had a chance to have been discussed at the Hearings in week commencing 5 December 2022).

6.1.5 This approach to the Changes Application is predicated on the presumption that no separate non-statutory consultation would be required in advance of the submission of the Changes Application.

6.1.6 The Applicant considers that this is an appropriate approach for the following reasons:

- a. the changes that are being made are directly as a result of feedback that has received through the Examination process by the same parties who would be consultees to any consultation that would be carried out;
- b. the changes involve removing land (including the extent of compulsory acquisition) and Scheme elements; thereby reducing impacts, rather than changing or expanding them;
- c. mindful of the *Wheatcroft* and *Holborn Studios* principles and the 'impact to business and residents' criteria in the DCLG Guidance on changes to DCOs, parties will be able to make submissions in respect of the consequences of the proposed changes during the Examination process, but are in any event likely

to welcome the removal of part of the Scheme, given the concerns expressed by Interested Parties in respect of the size and scale of the Scheme;

- d. this is a step open to the ExA in light of Figure 1 Step 2 of PINS Advice Note 3 referring to the ExA's considering the need for consultation as well as its 'scale and nature'; and
- e. in light of the recent experience on other DCOs such as the Net Zero Teesside project, where numerous changes were made throughout the pre-Examination and Examination period; and that once Examination commenced, non-statutory consultation was not required by that ExA. The changes brought forward on that project were primarily to do with the removal of land and optionality within the application, so therefore have parallels to the position with this Scheme.

6.1.7 Having discussed the principle of the Changes Application with the Local Planning Authorities (including its contents), it is understood (although not yet confirmed) that they are supportive in principle that additional consultation would not be required.

6.1.8 The Applicant would therefore welcome confirmation from the ExA that it can proceed with submitting the Changes Application at Deadline 5 with no separate non-statutory consultation required.

6.1.9 If the ExA considers that non-statutory consultation is required for the proposed changes, the Applicant considers that such consultation:

- a. should not require a public exhibition or event, given the nature of the changes;
- b. should involve only local newspapers (i.e. not national);
- c. should involve the same 'Core Consultation Zone' as was utilised at statutory consultation;
- d. should involve writing only to land interests and statutory undertakers who have an interest/apparatus in the areas of land being removed from the Scheme; and
- e. should involve writing to relevant prescribed consultees that have an interest/responsibilities relating to the changes.

6.1.10 The Applicant suggests that the timing of any such consultation and its impacts on the Examination timetable would be as follows:

- a. in light of the fact that discussion on the points in this note at Hearings in the week commencing 5 December 2022, the requirements for newspaper notices, and the Christmas holidays, it is considered that any consultation would likely need to take place in the period 2 January 2023 to 30 January 2023;
- b. submission of the Changes Application following that consultation would then be able to take place by 10 February 2023, including an updated DCO (to inform the closely following Hearings which may include an ISH on the DCO);
- c. in the period between now and the 10 February, the current Examination deadlines and events could take place as currently programme;




- d. following submission of the Changes Application, any hearings that the ExA considers would be appropriate, could take place in the week commencing 20 February rather than the currently programmed week commencing 13 February. This would allow time for the ExA to formulate Hearing agendas with the change in place; and for the Applicant to be able to submit updated clean documents if the changes were accepted into Examination, prior to those Hearings;
- e. following the Hearings the week of 20 February 2023, publication of the ExA's commentary on the draft DCO would then need to be moved back to 27 February; and
- f. Deadline 7 would then be able to either stay as it is on 3 March 2023, or moved back slightly in that week. It is recognised that this would reduce time for post Hearing submissions and responses to the ExA DCO, but at that stage in Examination, and on the basis that consultation would have been carried out on issues relating to the changes, the Applicant considers that no prejudice would arise from that shortened time period.

- 6.1.11 As stated above, the Applicant considers that a consultation is not required on the proposed changes discussed in this note and further notes that the proposed timetable amendments set out in paragraph 6.10 would mean that the end of Examination would have tight timescales as a consequence.
- 6.1.12 However, whilst the Applicant's position is that consultation is not required, it has sought to demonstrate that whether a consultation is required or not, this could be accommodated within the Examination timetable.
- 6.1.13 The Applicant would therefore welcome a response from the ExA to the matters set out in this note in relation to the proposed Changes Application.

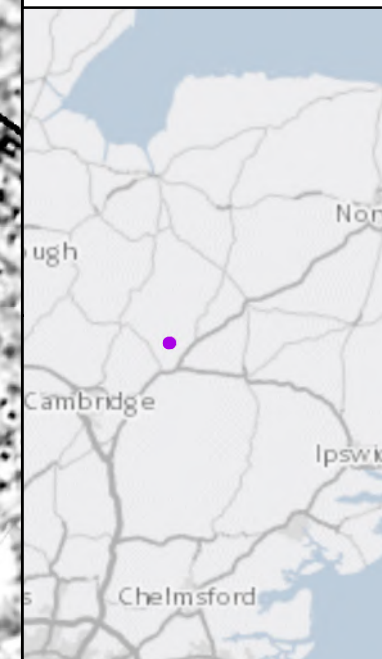
Appendix A Plan A: Crash Site Exclusion Area

THIS DRAWING IS TO BE USED ONLY FOR THE PURPOSE OF ISSUE THAT IT WAS ISSUED FOR AND IS SUBJECT TO AMENDMENT

Legend

-  Site of B50 Crash
-  Order limits and developable areas
-  Crash Site Exclusion Area - 50m x 50m

Sheet Layout



Copyright:
Contains OS data © Crown copyright and database right 2022
Contains public sector information licensed under the Open Government Licence v3.0

License Under the Protection of Remains Act 1986

Purpose of Issue
DETAILED ARCHAEOLOGICAL MITIGATION STRATEGY

Client
SUNNICA LTD



Drawing Title
B50 CRASH SITE EXCLUSION AREA

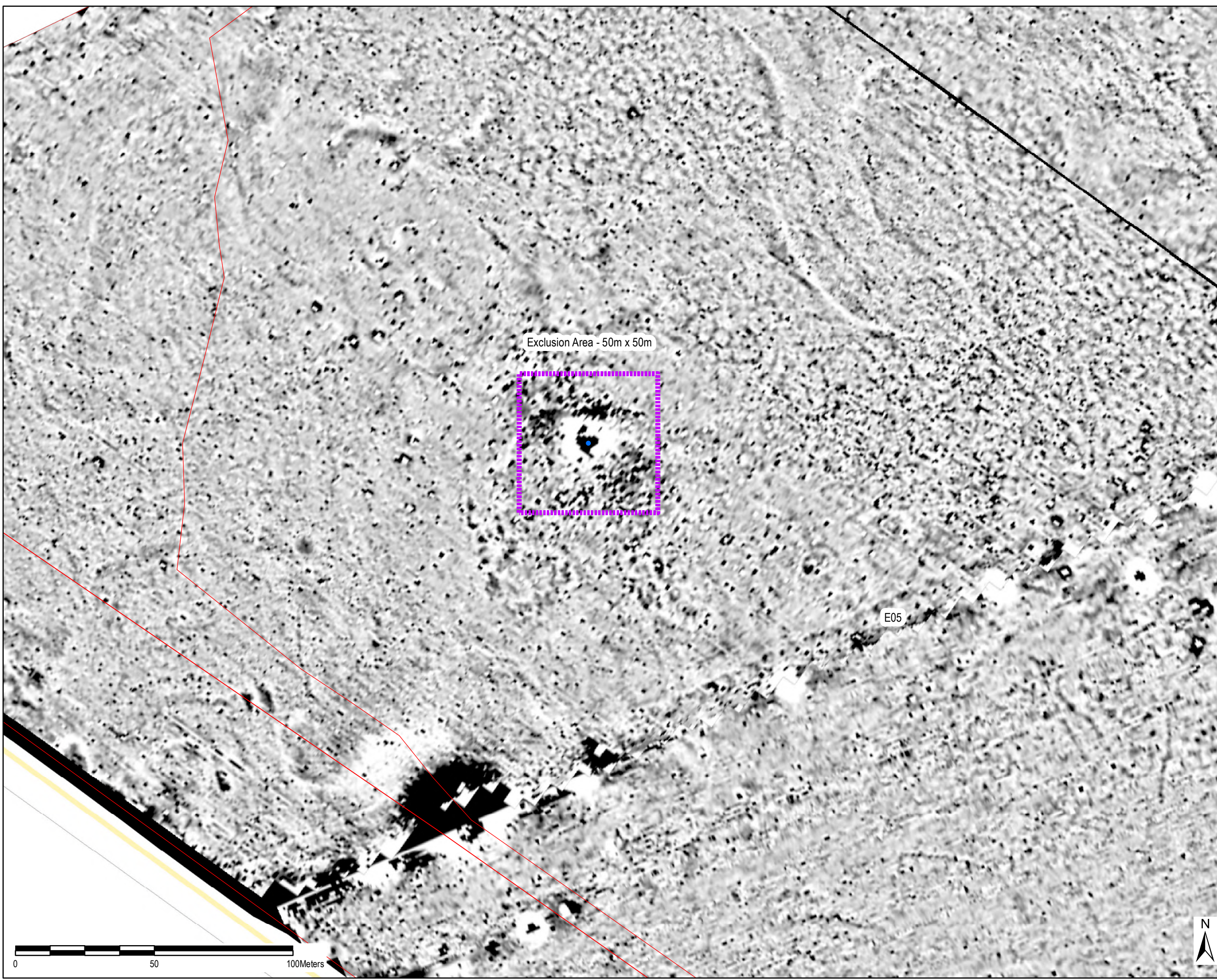
| | | | |
|--|---------------|-----------------------|--------------------|
| Drawn HW | Checked LL | Approved NC | Date 23/11/2022 |
| AECOM Internal Project No. 60589004 | | Scale @ A3 1:1,250 | |

THIS DOCUMENT HAS BEEN PREPARED PURSUANT TO AND SUBJECT TO THE TERMS OF AECOM'S APPOINTMENT BY ITS CLIENT. AECOM ACCEPTS NO LIABILITY FOR ANY USE OF THIS DOCUMENT OTHER THAN BY ITS ORIGINAL CLIENT OR FOLLOWING AECOM'S EXPRESS AGREEMENT TO SUCH USE, AND ONLY FOR THE PURPOSES FOR WHICH IT WAS PREPARED AND PROVIDED.

AECOM
Unit 1 Wellbrook Court,
Gilton
Cambridge, CB3 0NA
United Kingdom
Telephone (01223) 488000
www.aecom.com



| | |
|---|-----------------|
| Drawing Number 60589004_DAMS_SA_002 | Rev 0 |
|---|-----------------|






File Name: C:\Users\WaggonH\Documents\01_Projects\221123_Sunnica\221118_SunnicaEnergyFarm_figure11.mxd

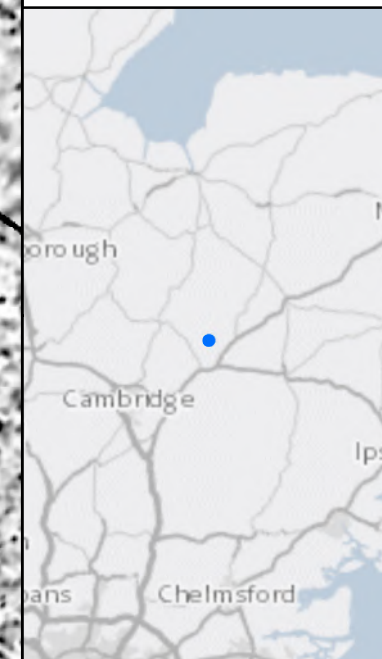
Appendix B Plan B: Potential Expanded Crash Site Exclusion Area

THIS DRAWING IS TO BE USED ONLY FOR THE PURPOSE OF ISSUE THAT IT WAS ISSUED FOR AND IS SUBJECT TO AMENDMENT

Legend

-  Site of B50 Crash
-  Potential Expanded Crash Site Exclusion Area - 100m radius
-  Order limits and Developable Area

Sheet Layout



Copyright:
Contains OS data © Crown copyright and database right 2022
Contains public sector information licensed under the Open Government Licence v3.0

License Under the Protection of Remains Act 1986

Purpose of Issue
DETAILED ARCHAEOLOGICAL MITIGATION STRATEGY

Client
SUNNICA LTD



Drawing Title
**B50 CRASH SITE
POTENTIAL EXPANDED
CRASH SITE EXCLUSION AREA**

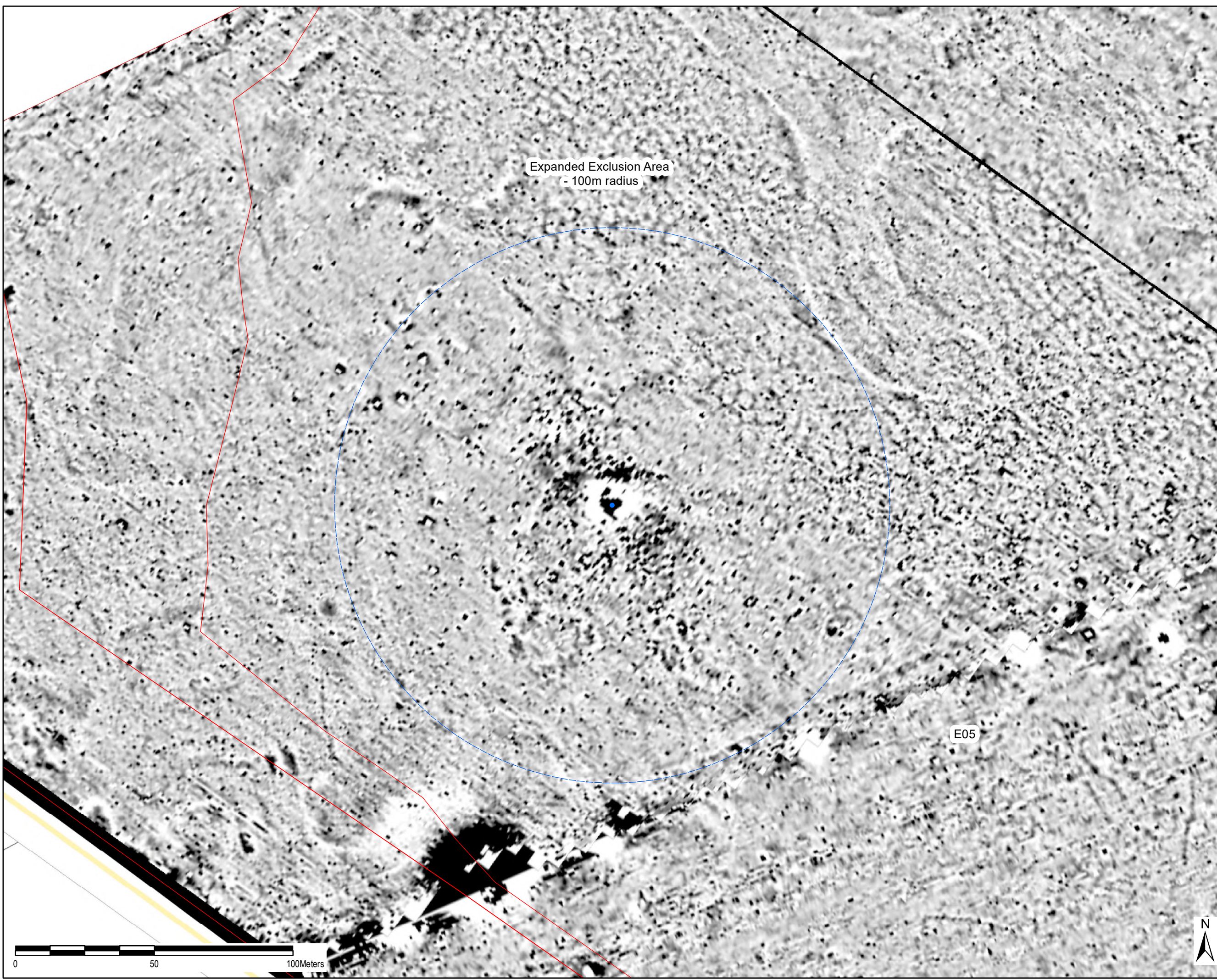
| | | | |
|--|---------------|-----------------------|--------------------|
| Drawn HW | Checked LL | Approved NC | Date 28/11/2022 |
| AECOM Internal Project No. 60589004 | | Scale @ A3 1:1,250 | |

THIS DOCUMENT HAS BEEN PREPARED PURSUANT TO AND SUBJECT TO THE TERMS OF AECOM'S APPOINTMENT BY ITS CLIENT. AECOM ACCEPTS NO LIABILITY FOR ANY USE OF THIS DOCUMENT OTHER THAN BY ITS ORIGINAL CLIENT OR FOLLOWING AECOM'S EXPRESS AGREEMENT TO SUCH USE, AND ONLY FOR THE PURPOSES FOR WHICH IT WAS PREPARED AND PROVIDED.

AECOM
Unit 1 Wellbrook Court,
Gilton,
Cambridge, CB3 0NA
United Kingdom
Telephone (01223) 488000
www.aecom.com



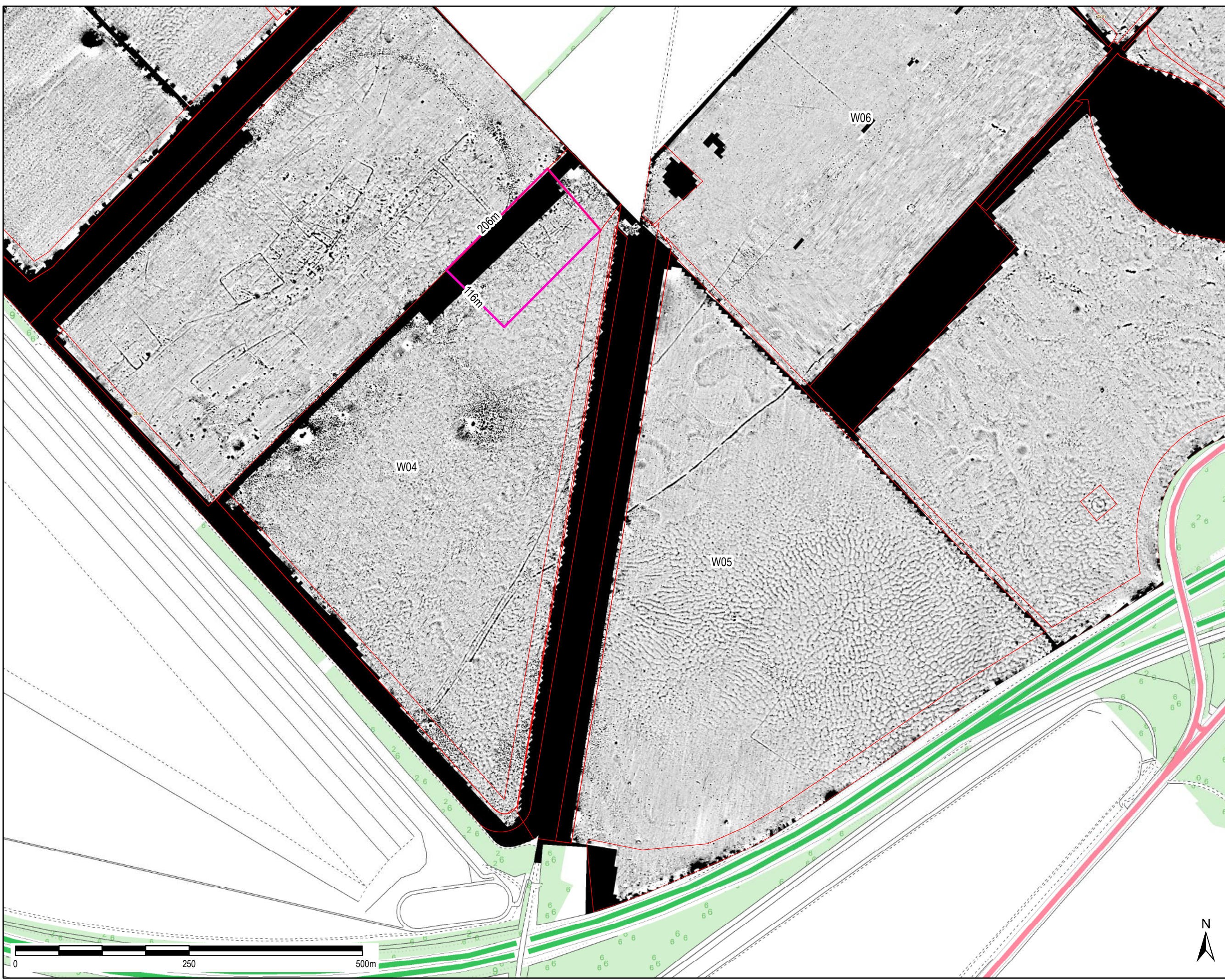
| | |
|---|-----------------|
| Drawing Number 60589004_DAMS_SA_002 | Rev 0 |
|---|-----------------|



File Name: C:\Users\WaggonH\Documents\01_Projects\221123_Sunnica\221118_SunnicaEnergyFarm_figure1.mxd

Appendix C Plan C: Area to be excluded from W-04

THIS DRAWING IS TO BE USED ONLY FOR THE PURPOSE OF ISSUE THAT IT WAS ISSUED FOR AND IS SUBJECT TO AMENDMENT



- Legend**
- Parameter Plan
 - W04 Proposed Extension to Archaeological Protection
Area= 23579.92 Square Metres

Copyright:
Contains OS data © Crown copyright and database right 2022
Contains public sector information licensed under the Open Government Licence v3.0

License Under the Protection of Remains Act 1986

Purpose of Issue
DETAILED ARCHAEOLOGICAL MITIGATION STRATEGY

Client
SUNNICA LTD



Drawing Title
W04 PROPOSED EXTENSION TO ARCHAEOLOGICAL PROTECTION

| | | | |
|--|---------------|-----------------------|--------------------|
| Drawn HW | Checked LL | Approved NC | Date 23/11/2022 |
| AECOM Internal Project No. 60589004 | | Scale @ A3 1:5,000 | |

THIS DOCUMENT HAS BEEN PREPARED PURSUANT TO AND SUBJECT TO THE TERMS OF AECOM'S APPOINTMENT BY ITS CLIENT. AECOM ACCEPTS NO LIABILITY FOR ANY USE OF THIS DOCUMENT OTHER THAN BY ITS ORIGINAL CLIENT OR FOLLOWING AECOM'S EXPRESS AGREEMENT TO SUCH USE, AND ONLY FOR THE PURPOSES FOR WHICH IT WAS PREPARED AND PROVIDED.

AECOM
Unit 1 Wellbrook Court,
Gilton,
Cambridge, CB3 0NA
United Kingdom
Telephone (01223) 488000
www.aecom.com



| | |
|---|-----------------|
| Drawing Number 60589004 DAMS_SA_003 | Rev 0 |
|---|-----------------|

File Name: C:\Users\WaggonH\Documents\221118_SunnicaEnergyFarm_figure3.mxd