



SUNNICA ENERGY FARM DCO EXAMINATION

COMMENTS ON LOCAL IMPACT REPORT

SAY NO TO SUNNICA ACTION GROUP LTD

22 NOVEMBER 2022

Introduction

1. The Say No to Sunnica Action Group Limited (SNTS) is an interested party (ID No 20031080) in the DCO examination.
2. By this submission, we comment on the Joint Local Impact Report **[REP1-024]** (LIR) submitted by East Cambridgeshire District Council, Cambridgeshire County Council, Suffolk County Council and West Suffolk Council (**the Councils**). The LIR was published on 20 October 2022, with the appendixes published on 11 November 2022¹.
3. In summary, SNTS broadly agrees with and supports the Councils' position expressed in the LIR. Now that the Written Representations have been published, the ExA will see that many of the conclusions reached in the LIR complement the views of SNTS. In these comments, SNTS does not attempt to identify every point of agreement or disagreement² with the LIR; this is apparent when our Written Representation is read alongside the LIR. Instead, we highlight some important points arising from the work of the Councils and express SNTS's views on those points.

Cultural Heritage (Section 7)

4. SNTS supports the conclusions reached by the Councils in the LIR on issues of cultural heritage. The conclusions reached broadly mirror those reached by SNTS's own consultant, Dr Richard Hoggett **[REP2-240c]**, with the few points of distinction present being relatively minor.
5. SNTS particularly notes the steps which the Councils regard as necessary to avoid harm to (1) Chippenham Park Complex; (2) Snailwell Fen and the Roman Villa; and, (3) the Limekilns. SNTS agrees that mitigation through screening (or other methods) is likely to be neither effective nor appropriate for these locations. Thus, SNTS agrees and submits that the only feasible option is the significant reduction or removal of development (being the PV cells,

¹ SNTS note the short timeframe between publication of the appendixes and the date for Deadline 3. We reserve the right to comment further if advised, considering the limited time available for review.

² For example, SNTS does disagree with the Councils' view that the ecology survey work was '*thorough*'.

BESS and substations) from the parcels identified. The extent of such reduction/removals will go as far as W01, and W03-W12.

6. In respect of non-designated heritage assets, SNTS agree that there must be clarification as to whether there are relevant NDHAs outside of conservation areas. As just one example, SNTS note that High Lodge (at the end of Chippenham Avenue) is currently being considered for local listing. If such assessment is not properly undertaken, there remains a real risk of further unidentified heritage harm.
7. As to archaeological evaluation, this is still ongoing with the involvement of Suffolk and Cambridgeshire County Councils. SNTS approve of this approach as an appropriate way of ensuring that sensitive areas are safeguarded from construction (with some locations earmarked for further excavation). We support the Councils in their insistence that evaluation works continue and that further steps to clarify required mitigation are undertaken.
8. Overall, SNTS is of the view that the heritage section of the LIR complements the more extensive work done by Dr Richard Hoggett on behalf of SNTS³. Points of distinction are overall minor⁴. We agree that the scheme as proposed will significantly harm a number of important heritage assets.

Ecology and Biodiversity (Section 8)

9. SNTS broadly supports the conclusions reached by the Councils in the LIR on ecology and biodiversity. Our ecology consultant, Dominic Woodfield of Bioscan, has produced a briefing note commenting on the LIR which we now provide to the ExA [**Appendix A**]. The content of that briefing note is not repeated here, although SNTS does flag Mr Woodfield's comment that he does not agree that the survey work undertaken was '*thorough*' (as expressed in para 8.1 of the summary to that section). Mr Woodfield's original report is at [**REP2-240e**].

³ For example, Dr Hoggett looked at the issue of scheduled barrows in detail which the LIR does not.

⁴ For example, a distinction arises in the consideration 'other listed buildings' (1b) because the Councils' report includes the southern gates of Chippenham Park are grouped in with the overall complex in (1a).

Landscape and Visual Amenity (Section 10)

10. SNTS supports the conclusions reached by the Councils in the LIR on issues of landscape and visual amenity. Our landscape consultants, Michelle Bolger Expert Landscape Consultancy, have produced a briefing note commenting on the LIR which we now provide to the ExA [Appendix B]. As is apparent, our experts broadly agree with the conclusions reached by the Councils in their LIR. They find that the site selection process was fundamentally flawed with development included in areas which are unsuitable on landscape and visual grounds⁵. Of particular note is the agreement between our experts that significant portions of the developable area of the scheme at W01-W12, W17, E05 and E12 should be removed. SNTS also notes with agreement the harm identified to U6006; such harm will change the character of this PROW to one of an industrial nature. Our consultants' original report is available at [REP2-240b].

Noise, Vibration, Dust, Light/Glare (Section 11)

11. SNTS note and agrees with the position advanced by the Councils that full and continuing assessment of noise, vibration, dust, light and glare is required. The scheme is located close to many sensitive receptors, including the permanent Traveller Community site at Red Lodge (which is very close to the proposed BESS site at Sunnica East B). Such residential receptors are particularly sensitive to all of these matters, and it is imperative for reasons of health and amenity that the scheme does not impact these people harmfully⁶. It is necessary that such monitoring includes a mechanism for enforcement to allow for the Councils to stop works (be they construction, operation or decommissioning) until harm to these receptors is resolved.

⁵ SNTS does note that the Councils have commented on the CGI photomontages produced by the Applicant. SNTS is of the view that there is an insufficient number of photomontages considering the size of the scheme, and that certain key views have not been included.

⁶ This is essential in the context of a draft DCO which includes a defence to a claim of statutory nuisance falling within s.79(1)(g) of the Environmental Protection Act 1990 (noise emitted from premises so as to be prejudicial to health or a nuisance). See article 7 of the draft DCO [REP2-012].

Socio-Economics and Land Use (Section 12)

12. SNTS welcomes the concerns expressed by the Councils in the LIR in respect of socio-economics and land use. There are various aspects that make up this section, a number of which SNTS has undertaken a further detailed reply and instructed experts to consider matters (e.g. the horse racing industry; agricultural land use). The concerns expressed by the Councils in this section are complementary to those more detailed reviews that SNTS has undertaken. SNTS also broadly agrees with the criticisms the Councils make of the underlying assessment undertaken by Sunnica to quantify the socioeconomic impact that the scheme will have.
13. In respect of the horse racing industry, the Councils have identified some of the concerns expressed by the industry about the risk of harm that the scheme poses. SNTS instructed a planning consultant, Mr Richard Sykes-Popham of Rapleys, to review the horse racing industry and the risk posed by the scheme **[REP2-240f]**. As part of that review, Mr Sykes-Popham interviewed various members of the horse racing community and identified a significant risk of harm posed by the scheme and (particularly) the changing setting of horse racing in Newmarket if the scheme is consented to and built.
14. While SNTS agree with the Councils that Sunnica must work with the horse racing industry to try and mitigate these harms, we regard them as fundamentally difficult to mitigate. This is because the most significant harms are consequential on the landscape, heritage, and design harms posed by the scheme. As the Councils have recognised in the LIR, these harms (centred on the development at W03-W12) are very difficult (if not impossible) to mitigate. The development threatens the perception of those involved in the industry, most importantly prospective investors, and will detrimentally impact their view of Newmarket as a leading location for horse racing (and thus their desire to invest or be involved there). This is particularly so with the cumulative effect and size of the scheme, which gives the impression of the local landscape being taken over by PV generation. Thus, it is difficult to identify mitigation which does not significantly reduce or remove development from those areas.
15. SNTS does not repeat the content of the report of Mr Sykes-Popham here but invites the ExA to read it as a more in-depth analysis of the concerns identified by the Councils in the LIRs. SNTS also invites the ExA to place considerable weight on the representations, be they written or oral, of longstanding members of the horse racing community.

16. The Councils' LIR comments on heritage and landscape are important for the same reason in respect of tourism. SNTS agrees that it is necessary for Sunnica to undertake steps to mitigate the harm of the scheme to tourism. However, again, the harm itself is necessarily hard to mitigate because it arises out of the landscape, heritage and design of the scheme. Visitors who have previously enjoyed the countryside around Newmarket will see a degradation in the quality of the landscape and the setting of heritage assets. It is difficult to see how economic initiatives alone will be able to mitigate the permanent harm posed by the scheme.
17. As to agricultural land use, SNTS agrees with the concerns advanced by the Councils concerning both the methodology used in the Soils and Agriculture Baseline Report and the assessed classification of the soils. Indeed, the Councils' view that the soils in Cambridgeshire are particularly versatile is an important one which accords with the conclusion reached by SNTS that the Applicant has under-graded significant portions of the land. Going further, we would also note that many high-quality crops are grown on the land without irrigation⁷. In our Written Representations, SNTS has disclosed a report led by Reading Agricultural Consultants, which addresses this in detail [REP2-240d]. These matters are not repeated here, but we say complement the concerns identified by the Councils and consider them in far more detail.

Transport (Highways) (Section 13)

18. SNTS notes the significant amount of work that the Councils have done on highway matters and agrees with their position. The Councils' note and SNTS agree, that various aspects of transport for the scheme remain unassessed, including weight assessments of access routes, width assessments of access routes, and road safety auditing of all access points to the sites. It is necessary that the Applicant engage fully with LHAs and provide for their involvement in the technical approval and construction stages of the works if the DCO is granted. However, it is also necessary that the ExA be satisfied that the development can be undertaken with the transport proposals as currently designed, particularly as it is necessary that the scheme be deliverable within the order limits as currently advanced.

1. ⁷ For example, maize, malting, barley, milling wheat, sugar beet and rye are all successfully grown on the land without irrigation.

SNTS also shares the concern that maintenance and funds for the highways involved are limited and additional HGVs risks significant degradation; an approach for recovery of excess maintenance costs using the s.59 HA 1980 should be provided.

Public Rights of Way (PROW) (Section 14)

19. SNTS welcomes the concerns raised in respect of PROWs around the site (with a particular emphasis on harm to U6006). SNTS notes and agrees with the view of the Councils that PROWs exist as both historic and living features of the landscape, which need to be assessed as such in order to properly protect and treat them. In particular, SNTS agrees with the harms identified by the Councils in their section on landscape and visual impact and notes that such landscape change will fundamentally alter the setting of many PROWs (which currently pass through an agricultural and rural landscape). Such harm is difficult (if not impossible) to mitigate, and will irreparably change the historic and living nature of these features.

Air Quality (Section 15)

20. SNTS agrees with the Councils that unplanned atmospheric emissions remain a significant problem with the scheme that cannot be properly assessed without the provision of appropriate information about the BESS. SNTS agrees with the Council that such modelling, including all the emissions of a fire/thermal runaway event⁸, must be modelled and secured in the DCO.

Climate Change (Section 17)

21. SNTS has been able to look at the issue of climate change, and particularly greenhouse gas emissions, in more detail than the assessment in the LIR. The Councils noted that embodied carbon is the major contributing factor of carbon emissions in the scheme. SNTS agree and refer the ExA and the Councils to the report of Cranfield University submitted with SNTS's Written Representations **[REP2-240g]**. One important point to note is that, due to operational repair (including, most significantly, the need to replace batteries in the lifetime

⁸ While fire is a colloquial term for events such as thermal runaway, it is important to note that 'fire' does not accurately reflect the specifics of how such an event proceeds (e.g. unlike a typical fire, there is no need for oxygen).

of the scheme), the operational phase does have a significant negative impact in the form of emissions. Save for the limited circumstances set out in that report⁹, Cranfield has calculated that the scheme produces more carbon than it saves over its lifetime when compared to the predicted greenhouse gas emission intensity of the National Grid over the same period.

Battery Fire Safety (Section 18)

22. SNTS note that Sunnica has produced a new Outline Battery Fire Safety Management Plan in response to concerns raised by participants involved in this examination, including the LIR produced by the Councils. It is SNTS's intention to comment on this new plan, which supersedes the plan upon which the Councils commented in writing their LIR.
23. Notwithstanding this, SNTS agrees with a number of the problems raised by the Councils in respect of Battery Fire Safety. SNTS agrees with the Councils that there is such a lack of detail in the application that the impact of battery fire safety cannot be properly defined and that appropriate safety measures cannot yet be assessed. To take one example, the chemistry of the batteries remains unidentified. This will inform what a 'reasonable worst case' event will be for a BESS site including: (1) emissions; (2) the likelihood and chemistry of a thermal runaway event; and (3) the approach to extinguishing/containing such a fire/event; and, (4) cooling water requirements and containment of contaminated water (because of the solubility of thermal runaway by-products).
24. SNTS also agrees with the Councils that the assessment that has been done has used inappropriate standards. This includes (for example) the use of BS 9999, but SNTS notes this also includes any extant guidance on firefighting that does not take into account the special features of a BESS fire (including the fact that thermal runaway events require no oxygen).

Cumulative Impact (Section 20)

25. SNTS agrees that cumulative impact must be assessed with those developments set out in Tables 15-18 in mind. Aside from those developments already identified, SNTS would also add: (1) Goosehall, Factory Road, Burwell (39.5MW solar site under ECDC 15/00723/ESF);

⁹ Due to the lack of information in the application (e.g. on the BESS) Cranfield have had to consider a range of options and scenarios; this is set out in detail in the report.

(2) Heath Road Exning (27.2MW solar site under ECDC 13/00878/ESF); and, (3) Weirs Drove, Burwell (49.9MW BESS approved under ECDC 19/00155/FUL). SNTS agrees with the Council and repeats its view that the landscape is becoming increasingly industrialised by energy-related infrastructure. Along with those other developments identified by the Council, the area is also becoming less open and less rural due to the cumulative effect of development. SNTS draws particular attention to the Kennett Garden Village and Hatchfield Farm developments due to their proximity to the scheme¹⁰.

26. As SNTS has emphasised in its Written Representations, the scheme itself has internal cumulative impact because of its design and nature. It is split into many islands which appear across the landscape. Alone, this means the scheme has a significant cumulative impact internal to itself; taken with the additional developments that the Council has identified, this will have further significant harmful impacts. SNTS agrees with the identification of ecology, transport and socioeconomic impacts. However, most substantially cumulative impact arises from the visual and heritage impact across the location.

Conclusion

27. As was set out in the introduction to these comments, SNTS broadly agrees with the LIRs as produced by the Councils. We regard them as complementary to our conclusions set out in our Written Representations. To avoid duplication, SNTS has not gone through each paragraph line by line to indicate agreement or disagreement; the ExA is invited to read the LIR alongside our Written Representation as broadly complementary.

¹⁰ There also remains the conflicts, noted by the Council, with other existing and proposed developments (e.g. the Bay Farm polytunnels and Bay Farm Anaerobic Digestion Plant).

Appendix A

SAY NO TO SUNNICA

COMMENTS ON LOCAL IMPACT REPORT

(REP1-024)

Chapter 8 – Ecology and Nature Conservation

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21st November 2022

Introduction and purpose of this note

On behalf of Say No To Sunnica (SNTS) Bioscan have reviewed Chapter 8 (Ecology and Biodiversity) of the Local Impact Report (LIR) produced jointly by East Cambridgeshire District Council, Cambridgeshire County Council, Suffolk County Council and West Suffolk Council [[REP1-024](#)].

Comments are provided below on the primary areas raised in the LIR and the degree to which they accord with, add to or otherwise align with SNTS concerns, as presented in its submissions to the Examination at Deadline 2.

Areas of concern shared with the Councils

In terms of the broad areas of concern raised by the Councils, Bioscan (representing SNTS) comment as follows:

Stone Curlew.

STNS/Bioscan agree with the Councils' concern on this matter and with the concerns expressed about the adequacy of the areas set aside for stone curlew compensation, both in terms of area and location. STNS/Bioscan, also have concerns about the deliverability of the habitat changes proposed for the identified compensation areas, having regard to factors such as latent soil fertility, other legacies of agricultural use and matters such as seed sources and supply for the habitats proposed to be created. Given the scarcity and sensitivity of stone curlew and the prospect of functional linkages between affected pairs and the Breckland SPA, a precautionary approach should be taken in the face of such uncertainties and Bioscan/STNS agree that this would lend support to 'additional and alternative stone curlew mitigation and compensation measures to ensure no significant net negative effect on this iconic species', as advocated by the Councils.

No invertebrate surveys (terrestrial or aquatic) have been completed to inform a robust assessment and evaluation of the potential for both construction and operational impacts on Chippenham Fen SAC/Ramsar/SSSI/NNR and local populations.

In light of increasing concerns expressed internationally about the potential impact of solar arrays on aquatic invertebrate species attracted to polarised light, we agree with the Councils that the absence of any survey work on this group is an omission. There can be little dispute that the evidence of potential impacts from this source is compelling and that panel arrays in Sunnica West Site B (in proximity to the designated site) therefore pose a credible risk of creating an ecological trap for invertebrate fauna associated with the SAC/Ramsar/SSSI/NNR. This matter should be thoroughly examined in order to define the risk, if any, to the integrity of not only the international designations (in accordance with Appropriate Assessment/HRA requirements), but also the integrity of the SSSI and

the site's ecological integrity more generally. The starting position, in accordance with the avoid-mitigate-compensate hierarchy should be to avoid impacts on such high value resources entirely which demands a precautionary approach wherever there is any doubt whatsoever over whether significant effects could occur.

We note that the applicant's originally submitted HRA [APP-092] gives this matter only cursory attention and appears to rely on the 200m distance between wetland within the international site and the nearest proposed PV positions to suggest that there "are no pathways for significant effects on invertebrates" associated with the SAC and Ramsar (e.g. APP-092 page 8M-60). This assessment is no more than an unevidenced leap of faith. The Examining Authority will note, in any event, that the applicant's position has now changed. Indeed the conclusions of the applicant's HRA are now flatly contradicted by the applicant's more recent response to the Examining Authority's First Written Questions (FWQs) [REP2-037, Appendix C]. In this appendix, further attention has been given to aquatic invertebrates and the risk posed to them by photovoltaic panels in the form of a desk-based review of available literature and a revised assessment based on little more than guesswork and the use of proxy scenarios. We offer a provisional view on this information here and may expand on this in further submissions.

The literature review demonstrates that this is, contrary to the position taken in the applicant's HRA, a credible impact risk and it exposes that the complete absence of relevant survey data that would assist in defining the risk more acutely is a significant failing of the application submission. In lieu of empirical data or site-specific evidence to inform this belated impact assessment, the applicant sets up a theoretical scenario using a weak flying taxon (Ephemeroptera) and a set of unproven assumptions about what happens at and around Chippenham Fen. It is not stated whether the scope of this review and the proxy-based scenario modelling approach to assessment was agreed or even discussed with Natural England or other stakeholders.

STNS/Bioscan agree with the Councils that baseline invertebrate survey data targeted to the potential impact vector is necessary in order to inform a robust assessment of potential impacts from this source. The approach taken by the applicant in responding to the Examining Authority's FWQs is no more than an elaborate exercise in trying to paper over the cracks. Invertebrate surveys could have established whether target species from the SAC/Ramsar/SSSI populations occur at the locations proposed for panel arrays (rather than guessing whether they do or do not) which could have either lent support to the conclusions the applicant presents that there is no likely significant effects or, in the alternative, could have better defined the magnitude of effects and guided decisions on avoidance, mitigation and compensation. As the applicant has failed to collect such data, it seeks to deal with this potential impact vector to the international site via little more than conjecture and supposition. This is not a robust approach and in the absence of further work, STNS/Bioscan supports the Councils' suggestion that the panels should be removed from Sunnica West Site B for precautionary reasons.

Inadequate baseline habitat and bird surveys and resultant concerns about adequacy of compensation proposals and whether net gain is achievable

We note that the Council's LIR indicates broad concerns with the applicant's Phase 1, arable field and hedgerow surveys, but then (at 8.5) goes on to list additional areas of deficiency, including in respect of the breeding and wintering bird assemblage (including skylark) and the issue of overall biodiversity losses or gains via the Biodiversity Net Gain calculations. We refer the Examining Authority to STNS's Deadline 2 submissions (and the Bioscan reports therein) on these collective matters. STNS/Bioscan agrees that the Phase 1 surveys (including hedgerow surveys and surveys for scarce arable weed assemblages) are less than adequate for robust impact assessment and planning determination, and also that there are acute deficiencies in terms of the applicant's approach to assessment of

impacts on farmland birds (and skylark in particular) as well as the assumptions underpinning the mitigation and compensation proposals for this group of species.

STNS/Bioscan also strongly agree with the Councils that the inadequacies of the baseline surveys of notable arable flora have driven an artificially restricted quantum of compensatory habitat provision for this locally important ecological resource. STNS's Deadline 2 submission, and the Bioscan reports contained within it, provide further detail on STNS's concerns on this matter, including how the approach to scoring arable land in the applicant's BNG calculations embeds within it an unjustified diminution of the actual value of these resources in real biodiversity and nature conservation terms.

Badger territory mapping has not been carried out

STNS agree that a thorough assessment of ecological and protected species impacts (including whether there is any likely impediment to the grant of licenses) should include badger territory mapping at a sufficient level to ensure impacts such as potential loss or deterioration of foraging area due to construction phase physical and human disturbance and, in the long term, due to shading impacts, can be appropriately quantified and assessed.

Conclusions on LIR

Considering the above issues, and the work that Bioscan have done in independent review, SNTS would not choose to use the phrase in para 8.1 of the LIR that the survey work undertaken by Sunnica is "thorough". Bioscan's independent review has found it to be a good deal less than thorough in a large number of publicly accessible locations, as set out in SNTS's Deadline 2 submissions, and there is no reason to believe it is any more thorough across the remainder of the study areas that Bioscan could not gain access to. In all other respects, SNTS agree with the specifics and the generality of the multiple concerns raised by the Councils as to a) the adequacy of the baseline surveys submitted by the applicant; b) the adequacy of the mitigation and compensation proposals (and whether opportunities to avoid impacts have been duly taken), and; c) the consequent robustness (or lack of) of the ecological impact assessment and Habitats Regulations Assessment generally.

Dominic Woodfield CEcol Cenv MCIEEM
21.11.22

Appendix B



Landscape Briefing Note 6

Project: 1186 Sunnica PVD
Date: 18th November 2022
Purpose: Review and comment on Combined Local Impact Report
Reference: 1186 BN06 Sunnica PVD Comments on LIR.docx
Author: John Jeffcock CMLI

Introduction

1. This note provides our findings following our review of the Joint Local Impact Report (LIR) prepared by East Cambridgeshire District Council, Cambridgeshire County Council, Suffolk County Council, and West Suffolk Council (the Councils) in relation to the proposed Sunnica Energy Farm (the proposals). Our findings below are structured between the Executive Summary of the LIR, and Section 10 of the LIR which deals with landscape and visual amenity matters. At the end of this note is a summary and conclusion which references the findings of our report prepared on behalf of Say No to Sunnica (*Landscape and Visual Issues Relating to the Sunnica Energy Farm*, 8th November 2022).

Executive Summary of LIR

2. We agree with the Councils' conclusion at Paragraph 1.1 (third bullet), that the landscape and visual amenity impacts generated by the proposals relate fundamentally to the nature and location of the proposals, and therefore these impacts '*are unlikely to be capable of being dealt with without significant revision of the proposal to remove parts of the scheme in the most sensitive areas*'.
3. We agree with the '*significant concerns*' raised by the Councils in relation to the '*vast majority of Sunnica West*', and other specific concerns regarding Sunnica East. In relation to this, we support the Councils' recommendations that:
 - Parcels W01-W12 and W17 should be removed from the developable area in Sunnica West.
 - Parcel E05 should be removed from the developable area in Sunnica East.
4. Although not referenced in the Executive Summary of the LIR, we also support the specific recommendation that:
 - Parcel E12 should be removed from the developable area in Sunnica East (see LIR Page 123, and Paragraph 10.205).



LIR Section 10 Landscape & Visual Amenity

5. The Councils' assessment of landscape and visual impacts is generally consistent with our own. Set out below (by topic) is a summary of the key points made in Section 10 of the Councils' LIR, with which we agree (our headings).

Site Selection

- The Councils consider that good design begins with the site selection process (para 10.4). We agree with the Councils' conclusion that the evidence for the selection of the site for the Sunnica proposals is insufficient because there is no data provided that would demonstrate why the chosen sites were more suitable than others. No alternative search areas were identified and compared with the selected sites (para 10.5).

Extent of Project Site

- The Councils consider that in landscape terms the proposals at Sunnica are set apart from other solar developments by scale and extent, and that these factors have led to significant landscape and visual impacts (para 10.5).
- In particular, the Councils are concerned that due to their scale, the proposals would dominate and transform the local landscape, altering it beyond recognition, and thus creating a new solar farm landscape (para 10.7).

Impacts

- The Councils consider that due to geographical extent, and the scale and duration of the proposals, significant adverse landscape and in some cases permanent visual impacts would result (para 10.1).
- The Councils consider that it is not possible to mitigate some of the impacts of the proposals, including the loss of the rural character of the landscape. We consider the loss of rural character to be one of the most significant impacts (Table 6, first row).
- The Councils consider that the proposals would transform the existing agricultural and rural landscape into an essentially industrial landscape. Due to the fragmented layout of this change, around several settlements, it would also have a significant impact on a sense of

place locally (para 10.13), the quality of life of residents within the affected villages and communities, and an impact on their *‘place attachment’* (para 10.15).

- The Councils consider that the proposals would have significant adverse impacts on the historic landscape of Chippenham Park and the Limekilns. In relation to the latter, due to local landform (elevation), the proposals would be highly visible across an area not only used for horse riding but recreational walking. The Councils consider that even with mitigation, the impacts of the proposals cannot be reconciled with the historic landscape and setting of Chippenham Park (Table 6, third row).
- The Councils consider that cumulative and sequential effects on landscape character and visual amenity would be significant (para 10.14).
- Due to the *‘temporal accumulation of adverse effects’* the Councils consider that it is not reasonable nor appropriate for the lifespan of the project to be 40 years (para 10.12).

Mitigation

- The Councils consider that the mitigation proposals are *‘not sufficiently tailored’* to the different landscape character types affected and are *‘not ambitious enough to sufficiently deal with the degree of harm caused by the project’* (para 10.2).
- In Table 6 the Councils consider that mitigation proposals are *‘insufficient’* (e.g., row 10), *‘based on insufficient baseline information’*, and are not *‘sufficiently robust, secure or proven to be deliverable’* (row 13). In the final row of Table 6 the Councils request the provision of a landscape strategy with more detailed landscape proposals.
- In Table 6 the Councils set out a number of specific alternative mitigation measures, to those put forwards as part of the current proposals. These include recommendations such as incorporating setbacks, buffers, and vistas (presumably within the mitigation planting and solar arrays) (e.g., first row), and the use of internal hedgerows/woodland strips within the developable areas (e.g., ninth row).
- The Councils consider that BESS buildings and other structures should be designed to resemble agricultural buildings (Table 6, seventh row).
- The Councils conclude that mitigation planting to screen the development can in some areas of open landscape have its own adverse impact (Table 6, first row).

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- Due to the significant impacts of the proposals on the existing identity /sense of place, the Councils consider that there might be a need to consider the creation of a '*new visually attractive identity*'. The Councils do not provide any specific proposals (and it is not for them to do so), and therefore it's not clear how this would be achieved. However, we agree with the Councils that the current proposals would have a negative effect on sense of place (para 10.9).
 - Although the Councils conclude that Sunnica West A is unsuitable for the proposals from a landscape and visual perspective, they consider that subject to exemplary design and mitigation, the area may be able to accommodate the proposed BESS (para 10.202). We do not agree that Sunnica West A is a suitable site for the BESS development, due to the impacts identified in sections 9 & 10 of our report. In isolation, this development would be a particularly incongruous feature, and would have an adverse impact on locations such as La Hogue Rd.

Submitted LVIA

6. The Councils have identified a number of concerns regarding the submitted LVIA, including:
 - They disagree with the method adopted in the applicant's LVIA, and they consider that this method includes a bias towards low impacts (para 10.78 & 10.79).
 - The Councils consider that the LVIA hasn't properly considered the relevance of the landscape character areas in its assessment of effects (paras 10.85 onwards) and has placed too much emphasis on the localised scale of change relative to the size of the LCAs (para 10.90).
 - The Councils consider that visual impacts have been underestimated due to some viewpoints looking the wrong way (para 10.92), and heights of users above 1.6m have not been reflected in the submitted visualisations (10.94).

Summary & Conclusion

7. Our report and the Councils' LIR reach similar conclusions in relation to the fundamental landscape and visual issues concerning the proposed Sunnica Energy Farm. In particular, we both agree that the site selection process undertaken by the applicant was fundamentally flawed and this has led to the development including areas which are unsuitable on landscape and visual grounds. A particular issue identified in both reports is that, due to

the location and extent of Sunnica West Site A, the development will be prominent in views across both the Limekilns and Water Hall Gallops, where it will erode the much celebrated and prevailing rural character of their settings, and impact directly on both horse riders and recreational users of the Gallops. Due to the elevation of these Gallops, the development will not be screened by planting.

8. Furthermore, consistent with our own findings, the Councils have identified that the proposals will result in substantial adverse cumulative impacts on landscape character, sense of place and identity. This is due to the overall scale of the proposals and their fragmented and dispersed nature across several discrete areas. Settlements including Freckenham, Badlingham, and Chippenham, and the historic Chippenham Park, which all currently have a rural setting, will be surrounded by electrical development. The Councils conclude that many of the impacts identified would be significant and *‘are unlikely to be capable of being dealt with without significant revision of the proposal to remove parts of the scheme in the most sensitive areas’*. The Councils have therefore recommended that the following areas are removed from the proposals, and we agree with their recommendations, that:
 - Parcels W01-W12 and W17 should be removed from the developable area in Sunnica West.
 - Parcel E05 should be removed from the developable area in Sunnica East.
 - Parcel E12 should be removed from the developable area in Sunnica East.
9. In relation to other parts of the development, the Councils consider that in some cases the current mitigation proposals are *‘insufficient’*, *‘based on insufficient baseline information’*, and are not *‘sufficiently robust, secure or proven to be deliverable’*. We also agree with these findings.