



16 December 2022 – Deadline 4

Application by Sunnica Ltd for an Order Granting Development Consent for the Sunnica Energy Farm Project

Review of Outline Landscape and Ecology Management Plan [REP3-011] and [REP3-012]

The following provides a starting point and suggestions for what the Councils (East Cambridgeshire District Council, Cambridgeshire County Council, West Suffolk Council and Suffolk County Council) would expect to see clearly set out in the OLEMP. Please note that the following comments are not exhaustive. The Councils are happy to provide further input after deadline 4.

Item	To be set out in OLEMP	To be detailed in LEMP
a. Description, illustration and evaluation of all features to be managed, including but not limited to existing and new woodland, existing and new hedgerows, wildflower margins, other grasslands and ditches.	✓	✓
b. Aims, objectives and principles of establishment and management	✓	
c. Ecological trends and constraints on site that might influence management	✓	
d. Appropriate management actions for achieving aims and objectives and adhering to principles	✓	✓
e. Prescriptions for management actions	✓	✓
f. Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period)		✓
g. Details of the body or organization responsible for implementation of the plan*	✓	✓

h. Ongoing monitoring and remedial measures. Contingency plans**.	✓	✓
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*The OLEMP shall also set out the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery.

**The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme.

The Applicant will need to work with the relevant local authority to ensure appropriate resourcing is in place to monitor compliance with the provisions of the OLEMP, and the plans and schemes of which it forms the basis.

The resulting LEMP shall be implemented in accordance with the approved details for the lifetime of the project. Further, it is the Councils' view that mitigation should and can be secured beyond the lifetime of the project. Further detail is provided in Suffolk County Council's submission in response to Action Point 8 following ISH2 which is submitted at deadline 4. Note in particular paragraph 28 of that submission, which provides an example of an amendment to the OLEMP which could secure long-term mitigation.

Establishment, Maintenance and Monitoring Principles that should be included in the OLEMP

- Principles for the DCO area, such as
 - Retention and positive management of existing trees, hedges and habitats, as far as possibly by basing the design on accurate and detailed baseline studies and surveys, including detailed tree and hedgerow surveys.
 - Retention, restoration and enhancement of existing pine-lines
 - No materials or vehicles, whether temporary or otherwise, shall be stored under crown spreads of trees.
 - Separate storage of woodland soils during construction and replacement within the woodlands post construction
 - Creation and management of buffers to enhance existing features and improve connectivity; description of types of buffers.
 - Where trees cannot be planted over the cables, habitat continuity would be maintained through planting of shrub species.
 - Establishment of species-rich grassland between and around the panels where this is possible.
 - Management of grassland for invertebrates
 - Planting of new woodland and hedgerows for visual screening
 - Reinstatement of all hedges removed for cable crossings, in particular in the vicinity of PRoW, respecting the legal extent of the PRoW
 - Retention, Reinstatement and Maintenance of existing and proposed screening vegetation for PRoW throughout the operational phase (including damage by disease and storm events, such as wind breaks).

- Integration of new permissive routes to allow for access to nature while managing recreational pressure on sensitive ecological habitats.
- Definition of
 - Standard working width (25m)
 - criteria that will trigger minimum working width of 10m (such as woodlands, tree belts, hedgerows)
 - Different approach to storing spoil and reduction of haul routes in minimum working areas
 - Maximum width for severance of woodland
 - Circumstances for trenchless techniques such as HDD (under which roads/ water courses/ to avoid archaeology/ under important hedgerows/ through woodlands and tree belts)
 - Depth of HDD (2m?)
 - Within works 6 areas: minimum percentage set aside for actual planting/ grassland establishment
 - Standards for quality of plant stock and procurement from nurseries
- Principles for pre-construction, during construction and post construction should include the following for example:
 - Where possible removal of vegetation would be timed to avoid the bird breeding season (March to August inclusive). Where tree or scrub removal during the breeding season is unavoidable, a check by the ECoW would be undertaken immediately prior to habitat removal to confirm that there are no occupied nests. Should any occupied nests be identified, an appropriate buffer zone (determined on the basis of the species concerned and the location of the nest in the context of the surrounding vegetation, but no less than 5m) would be implemented until the chicks have fledged.
 - For trees in which bat roosts have been identified or which are identified as having bat roost potential, then the measures set out in a bat mitigation section would need to be followed.
 - Hedges
 - An Arboricultural Method Statement (AMS) should be developed where each hedge would be a unique crossing number (and mapped accordingly). The species composition of each hedge would be stated, any special considerations (such as protected species) and the proposed species replanting mix stated. This would be undertaken in association with the project landscape architects.
 - A photographic survey should be undertaken to confirm the hedgerow condition, bank/ditch profile and to inform reinstatement techniques.

- **Objectives**

- To clearly outline the framework for ecological management and agree timetables for submission, after consultation with the relevant planning authority.
- To outline the provision of the details that would form both species protection and landscape mitigation planting schemes.
- To provide the basis for the agreement of a detailed Landscape Scheme for the DCO area with an aftercare period of 10 years for trees and five years for other planting and for grassland establishment. One for one replacement planting of failed plants would only be required for at least the first 5 years. Replacement planting after this date may be requested at the discretion of the relevant LPA.
- To provide the basis for the agreement of a detailed Landscaping and Ecology Management Plan for the protection and restoration of trees and hedges in the cable corridor, with an aftercare period of five years.
- It is expected that the schemes of planting and aftercare for the both the cable corridor and the solar sites would be delivered by contractors who can demonstrate appropriate experience and capacity to deliver effective and robust aftercare and provide a consistent quality of work across the whole project. The relevant LPAs would seek to work collaboratively with the Applicant to develop planting specifications for tendering for this work.
- To ensure all reasonable precautions are taken by the Applicant and their contractors to safeguard protected species. This plan also acts as the basis for a Species Protection Plan. A final detailed scheme of protection and mitigation measures for any European protected species shown to be present, prior to construction, will be agreed with the relevant authorities under requirements of the DCO.
- The OLEMP will also form the basis of a process of ongoing dialogue / forum with Local Authorities leading up to and during construction to ensure that Local Authorities are kept informed and satisfied of the implementation of the OLEMP (and the plans/schemes of which it forms the basis) and in order that they can also keep communities informed.
- The OLEMP should contain at descriptions of existing and proposed habitats and how the various proposed habitats will be established.
- The OLEMP should outline the desired outcomes and objectives for single species.
- The OLEMP should set out which planting is required for visual mitigation of adverse effects of the scheme, and which is to compensate for lost vegetation and set out how the successful establishment and long-term survival can be secured.

- Management prescriptions for all habitats and species in the DCO area should be given in outline and demonstrate that the objectives can be delivered through these prescriptions.
- The OLEMP should also outline what is meant by
 - 'conservation grazing' prescription,
 - 'management for pollinators', and also explain
 - 'natural regeneration' (shown in the Environmental Masterplan) in the context of proposed woodland. There is no reference to this in the OLEMP currently and this prescription, which may be desirable in some locations where planting is not required for visual screening, does require some explanation. Please clarify whether natural regeneration was considered in the LVIA/ES and whether and how it was reflected in the BNG calculations.

Compliance

- If protected species or trees and hedges specified to be retained, are unexpectedly found or damaged during construction, the following action would take place:
 - Works should cease immediately
 - The ECoW and/or ACoW and Construction Manager would be informed
 - The relevant area would be demarcated and access would be restricted if necessary
 - A way forward would be established and agreed and if necessary licences and authorisations would be sought
 - Works would restart once the EcoW and/or ACoW, Natural England and the relevant LPAs are satisfied with the works proposed.

Mitigation

Landscape and Ecological Management Scheme

Prior to construction a landscaping management scheme for each stage of the works would be produced to include details of all proposed hard and soft landscaping works, including:

- location, number, species, size and density of any proposed planting, including any trees
- cultivation, importing of materials, protection, and weed control to ensure plant establishment
- proposed finished ground levels
- hard surfacing materials
- vehicular and pedestrian access, parking and circulation areas
- minor structures, such as furniture, refuse or other storage units, signs and lighting
- proposed and existing functional services above and below, ground, including drainage, power and communications cables and pipelines, manholes and supports

- details of existing trees and hedges to be retained with measures for their protection during the construction period
- retained historic landscape features such as ditches and banks and proposals for restoration, where relevant
- implementation timetables for all landscaping works
- soil retention, handling and protection
- the provision of a scheme of sustainable drainage will be integrated into the details of hard and soft landscaping works at the converter station
- integration of relevant sections of local converter station design principles.
- all landscaping works would be carried out in accordance with the landscape management scheme, unless otherwise agreed in writing by the relevant planning authority, and to a reasonable standard in accordance with the relevant recommendations of appropriate British Standards or other recognised codes of good practice. The specific standards are to be agreed with the Councils prior to commencement.
- the Landscape Management scheme needs to be secured in the DCO.

Aftercare

- To ensure development of the agreed planting to a satisfactory standard, there will be an agreed procedure for joint annual inspection of all planting areas by representatives of the relevant Local Authority and developers at the end of each growing season and for each year of the aftercare period, (ten years trees and five years for shrubs and grassland) following implementation. Areas found not to be thriving should be treated to such additional works as are required to rectify the situation within the next growing season.
- Any tree or shrub planted as part of an approved landscaping management scheme that, within the first five years of the aftercare period (see 3.1 above), is removed, dies or becomes, in the opinion of the relevant Local Authority, seriously damaged or diseased, must be replaced in the first available planting season with a specimen of the same species and size as that originally planted, unless otherwise agreed in writing by the relevant Local Authority.
- Suspension of the aftercare period for any part of the scheme at the solar sites and within the cable corridor may occur in the event that in the opinion of the relevant LPA there was a significant failure of the planting scheme that could not be satisfactorily remedied in the following planting season, and or part of the planting scheme was failing to progress to the extent that it would not achieve the objectives of the scheme within the specified aftercare period.
- This type of aftercare needs to be secured through the DCO.

Comments on 6.2 Appendix 10I: Landscape and Ecology Management Plan Rev 1 [REP3-012]

- Why is it called LEMP, when it is an OLEMP?
- In Chapter 1.7 The OLEMP should set out clearly its own overall vision (rather than the scheme’s vision), such as enhancement and contributions to GI and NRNs and detail within the plan, how this is achieved.
- A plan should be provided that illustrates how the connectivity for varying habitats within the scheme and in relation to the wider GI and NRNs is achieved spatially.
- It seems that plant specifications are not consolidated in one area and information regarding size, density, species etc, is peppered throughout the plan. It would be helpful if this could be re-structured and consolidated.
- Where is impact avoidance for habitats covered and the need for construction exclusion zones – for example areas of acid grassland, CWS’s, riparian habitats?

Item	Comment
Figures 1-6 in Annex A	Please show how LEMP relates to wider Nature Recovery schemes and Green Infrastructure Strategies; show improvements to connectivity of habitats
1.1.13-1.1.19	<i>Sunnica East site B</i> Two veteran Hybrid Black poplar located on the southwestern boundary of E13 have not been noted.
1.3.3 f	Based on the changes made in relation to climate resilience, you may want to change this?
1.3.4	Consider that the second part of the sentence is not compliant with the requirements of the DCO
1.3.5	What about the OEMP?
1.4.4	Please specify why and when you would consider an update to the biodiversity baseline, for example, when surveys have expired, as new information becomes available, when changes to the scheme and proposals are made. Will the BNG calculation that accompanies each LEMP focus on the specific detailed design of that LEMP area/part of the scheme? Please outline the BNG auditing process for the operational lifetime of the scheme.
1.5	The pine lines are a feature of the landscape - can you be clear where the pine lines are?
1.5.2 d	E08 and E10 are not in the 'north-west' of Sunnica East A
1.5.3	Please provide accurate information on any veteran trees anywhere within the whole of the DCO area and within its zone of potential impact.

1.5.5	<ul style="list-style-type: none"> - the U6006 road is an important feature of this part of the scheme and should probably be described - there is a hedgerow in parcel ECO3 - there are a number of pine lines in parcels E13-E18 and E19-E22, and veteran trees in E13 <ul style="list-style-type: none"> - The western boundaries of E24 and 25 are largely open - The tree clump was in the central part of E27 and appears to have been felled?
1.6.8	<p>This is a sweeping statement, which requires further explanation:</p> <ul style="list-style-type: none"> - Please provide a more differentiated view on the land within the DCO; not all of it is intensely managed farmland or land of low ecological value. - Please demonstrate how the scheme links and would contribute to NRN and GI. - Please give examples of where in the scheme you have purposefully applied the mitigation hierarchy and avoided harm. - Please explain how the nature of the scheme makes any compensation with regards to habitats or species unnecessary. What about woodland and hedgerows? The next paragraph confirms that some habitats will be permanently lost, including <ul style="list-style-type: none"> - woodland (recorded as removed in the AIA) - Arable flora and other flora are species rather than habitats - winter bird assemblage
1.6.15	<ul style="list-style-type: none"> - Has the connectivity of the exiting GI network been assessed? - How do the proposed enhancements measures relate to and enhance the GI network and aid NRN? - How are watercourses and ditches being enhanced? And where are the measures outlined?
1.6.17	<p>It does not appear that the work plans adequately protect biodiversity and nature conservation. Not all features/habitats are marked on the work plans, and where they are shown they frequently include the option for Works to be undertaken, in particular Work No 1(iii). County Wildlife sites, which are to be retained and protected should be marked as such on the Work Plans. Other habitats that are to be retained should also be marked as such for the avoidance of doubt. Work No 6 - landscaping does not include for the retention and protection of existing features.</p> <ol style="list-style-type: none"> a) Please describe the reconfiguration of the solar arrays and how this has reduced harm b) 5m buffers are not sufficient in all areas. Whilst buffers are welcomed, there should be more information about the intension of these and the size. For example, where there are existing trees, the minimum buffer should include the RPA and any additional requirement to ensure that the trees do not shade the solar panels for the lifetime of the scheme. For veteran trees the buffer should be the greater of falling distance from the tree or 15m to ensure there is no future pressure to prune or reduce

	<p>branches. For standing deadwood in pine lines the buffer should also be falling distance.</p> <p>Please clarify which are undeveloped and which are to be planted</p> <p>d) It does no longer seem to be achievable to retain all woodland and trees; please amend accordingly</p>
1.6.18	For the measures to be effective they need to be properly captured in the Work Plans
1.6.19	<p>c) Please be more specific about the timing for the installation for protective fencing, include BS 5837:2012 for the protection of trees</p> <p>g) Is the distance of 10m from any watercourse a sufficient distance?</p> <p>j) The last sentence should probably end with: <i>unless the access needs to be retained.</i></p>
1.6.25	Please update to reflect latest position – badger sett closure no longer proposed?
1.6.25	No consideration of bats and potential licence requirements. Update section to set out how bats will be dealt with given the need for additional bat survey work / potential bat mitigation licence associated with tree works (e.g. T657), as per pages 38-42 [REP3-019].
1.6.32	<p>This needs to be secured in the DCO!</p> <p>Last sentence should be amended to say that contractor will carry out the recommendations of the detailed AIA, AMS and Arboricultural Report in full, including appointing a suitably qualified Project Arboriculturist who will oversee any works in the vicinity of trees.</p> <p>The AMS will need to be location specific.</p> <p>The findings and recommendations of the pre-construction tree survey will need to be submitted before or along with the detailed design of the scheme as it is required to inform the detailed design. Detailed design should be based on the pre-construction tree surveys and should minimise and justify any tree loss.</p>
1.6.35	It should be made clear that hedgerow removal should be minimised and only the section required to facilitate the construction should be removed.
1.6.36	Suggest you refer to the table in the Annex.
1.6.39	By smaller trees do you mean small nursery stock? Have you considered a mix of nursery stock as alluded to later in the document?
1.6.40	It is not clear how precautionary working methods in particular for pre-commencement site clearance will be secured as at that time a CEMP may not have been approved and implemented.
1.6.41	You should be aware that cleared and disturbed ground is attractive to stone curlew for nesting and precautions are required particularly in areas where records show that SC have nested in the past.

1.6.43	These measures will also be required in relation to stone curlew nesting within 500m of the DCO site in suitable habitat.	
1.6.44	This section probably needs to be updated as I think the requirement for excluding badgers has fallen away and to take into account the redesign of the fence (if necessary)	
1.6.45	I presume this will also apply to any pre-construction clearance too? And the same would apply to amphibians in the next sections.	
1.6.54	Does this also need to apply to retained features such as hedgerows and tree lines?	
1.7	Proposed Green Infrastructure	
1.7.6	The Councils' view is that these are not design principles relevant to the OLEMP. In particular a, b and c are design locational decisions that cannot be changed by landscape and ecology management. This section should focus on principles relevant to the establishment and management of the scheme GI framework. These should consider ecology, landscape, access and archaeology principles (please see list of Principles before this table)	
1.7.6 a. and b. and 1.7.8 a.	<p>With regards to the BESS, the Councils would like to make the following comments:</p> <p>E33 There should be a tree belt/woodland along the western side of E33 (Bess and substations). (see VP1, VP6, VP7)</p> <p>Subject to archaeological constraints, there appear to be opportunities for a more robust woodland planting scheme east of E33, which would help to screen the BESS even during winter conditions. (see VPs 2A and 2B)</p> <p>E18 Provide tree belt along north-western boundary. (see VP16)</p> <p>Consider moving BESS behind pine line to incorporate E17.</p> <p>Strengthen mitigation along Elms Road to be more robust.</p> <p>W17 would need to be embedded well into the historic landscape.</p>	
1.7.7	More information about the objectives of the GI for each of the parcels is required (as discussed at the 1.12.22 workshop). See below some additional landscape mitigation considerations for your attention:	
1.7.7	<p><i>Embedded mitigation measures proposed by applicant</i></p> <p><i>a. Parcel E01 – the solar panels are offset from the Fen woodland to the north and by 8m from the Lee Brook to the west. The proximity to the woodland aids in screening views from the wider landscape to the north;</i></p>	<p>Councils' comments</p> <p>E01 Additional riparian planting will be required. Increase distance/ buffer between Lee Brook and western boundary of E01 (understood to be 40m [REP3-019 p104] but there is an opportunity to provide additional riparian planting. Clarification is required on the width of the buffer /setback</p>

	<p><i>b. Parcel E02 – new woodland planting along the eastern edge of the parcel, to reinforce the vegetation structure adjacent to Ferry Lane and screen the panels in longer distance views from the east.</i></p> <p><i>c. Parcel E03 – new woodland to the north and south of the parcel, to screen views from the wider landscape to the north and from Lee Farm. The linear form of the woodland reflects the linear form of pine lines within the wider landscape and provides vegetation linkages east to west across this part of the scheme, between the Lee Brook and vegetation bordering Ferry Lane;</i></p> <p><i>d. Parcel E04 – as per E03, additional woodland along the northern edge and the eastern edge, adjacent to Ferry Lane, so as to screen the panels and improve the vegetation cover;</i></p> <p><i>e. Parcel E05 - the solar panels have been sited back from Beck Road via a landscape buffer of native grassland, to reduce the proximity of the panels to</i></p>	<p>form Woodland north of E01 and E02</p> <p>E02 Clarification is required on the width of the buffer /setback form Woodland north of E01 and E02</p> <p>E03 The Councils consider that the buffer should be sufficiently wide, so that Lee Brook remains legible in the landscape. In fact, this would be an opportunity to enhance the legibility of Lee Brook in the landscape by planting of appropriate tree species along both sides of the brook, which could be a visual benefit of the scheme. Therefore, we propose to increase the distance/ buffer between Lee Brook and western boundary of E03 to a minimum of 30m and to provide additional riparian planting (also see VP1). As a minimum provide woodland planting along the western/ north-western boundary.</p> <p>E04 Mitigation should be enhanced. Depending on what type of structures are envisaged for E04 and on the design in E33, it should be considered if, views from the residential properties to The Ark and St Andrew’s Church in Isleham could be retained. (see VP2C)</p> <p>E05 Lee Brook seems to be a suitable natural boundary for the solar plant. E05 should be removed from the scheme either entirely or be reduced to</p>
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	<p><i>road users, retain views along the road corridor of the churches in Isleham and Freckenham and to retain a perception of travelling through the landscape that separates the settlements;</i></p> <p><i>f. Parcel Eco1 – the proposals are for an area of native chalk grassland implemented via non-invasive methods, as a positive response to the below ground archaeology. In combination with Eco2, this will retain the open character of land between Isleham and Freckenham, to the west of Beck Road;</i></p>	<p>an existing field boundary, outside the plane crash side. The landscape is becoming more open here; dense woodland blocks are less appropriate here; suggest scattered trees in front of hedgerow (refer to App 10E, p.13, 'empty' perception to the character) (see VP5)</p> <p>The proposed permissive footpath along Beck Road should be moved next to the boundary hedge of E05. Occasional trees between the footpath and the road could then provide additional variety/amenity as well as separation from the road. The greater distance of the footpath users to ECO1 and ECO2 would also increase the chances of success with regards to Stone Curlew. Hedgerow with occasional hedgerow trees should be considered along Beck Road/ E05 boundary (south-west) to retain views towards Lee Brook (see VP6, VP7)</p> <p>Omit dense tree planting between Beck Road and south-eastern tip of E05 to retain views along Beck Road (either direction). (see VP11) River restoration scheme.</p> <p>Mitigation: Where proposed woodland is slim-line (along northern boundary of E05), a hedge may be preferable to retain views to Freckenham Church, taller structures within E05 permitting. (see VP3)</p> <p>ECO1 Consider whether landscape measures are required to reduce disturbance of offsetting land by recreational users on the dismantled railway line. Also consider whether a hedge should be planted to the east of this parcel along Beck</p>
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	<p><i>g. Parcel Eco2 – native chalk grassland and stone curlew plots, which in combination with Eco2 will retain the open character of the land between Isleham and Freckenham, to the west of Beck Road;</i></p> <p><i>h. Parcels E08, E09 and E10 are enclosed by new hedgerows, to screen views of the panels and reinforce existing hedgerow patterns. There is also a proposed area of chalk grassland within E09, above an archaeological mitigation area;</i></p> <p><i>i. Parcels Eco3 will establish a substantial offset from Freckenham Road, to reduce the perception of the solar panels and proximity to residents. The U6006 County Wildlife Site will be retained and is proposed for native chalk grassland as an improvement to the land cover compared to the agricultural fields;</i></p> <p><i>j. Parcels E12 – solar panels have been sited to the south of Worlington and offset from the residential land uses by native chalk grassland. These grassland areas would also provide opportunities for stone curlew mitigation;</i></p> <p><i>k. Parcels E12 to E17 – solar panels have been located within the smaller field parcels and offset from the intervening pine lines, so as to retain the field pattern and vegetation cover. The panels have also been offset from U6006, which is</i></p>	<p>Road to screen the road and new footpath from within ECO1</p> <p>Consider how the PRow can be screened to reduce disturbance to Sone Curlew and to prevent trespass onto the offsetting land.</p> <p>E08, E09 and E10 Photomontage suggests wider set back than Landscape Masterplan. (see VP12A) The woodland north of E08 needs to be wider as views are far reaching towards BESS. Mitigation for E10 should be fin tuned to suit the location.</p> <p>E12 Propose that E12 should be omitted from the scheme and be made into grassland. If this is not possible then the following changes should be made: Provide an appropriate set back from U6006 and screen planting along the eastern boundary of E12, hedge and pines. (see VP15A) There should only be one crossing point across U6006, where vegetation loss is minimal.</p> <p>E13-17 Retain curves in U Road between E13 and E14. Provide additional hedge along and adjacent to U Road</p>
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	<p><i>retained as a recreational route through this part of the Scheme;</i></p> <p><i>I. Parcels E19 to E22 – the solar panels in this part of the Site have also been located within the smaller field parcels, to reflect the landscape pattern and retain the intervening pine lines. New woodland is proposed around the perimeter of the parcels to reduce the visibility from</i></p>	<p>corridor. Retain all existing vegetation. Provide hedge along eastern boundary. Provide hedge planting along south-western boundary (along northern side of existing track). (see VP15B) Provide better screening in northern corner of E14 by planting up a triangular corner of sufficient size. Divide E14 halfway across and provide further screen planting from south-west to north-east to reduce visual effects. Along the boundary between E14 and E15 strengthen the existing pine line by planting additional pines. Along eastern boundary of E14 repair and strengthen the pine lines. It does seem appropriate to reinforce pine lines/tree belts along the western boundary of E14, E15 and E16 (for E16 also on southern edge) (see VP15B VP21, VP21A) But this will need to be sensitively done and woodland may be inappropriate. Along the boundary between E14 and E15 strengthen the existing pine line by planting additional pines. Along eastern boundary of E15 repair and strengthen the pine lines. Strengthen existing tree belt between E15 and E16. Create visual corridor north of this tree belt by using the existing track for access and screening the solar panels by planting up a sufficiently large triangular area in the western corner of E16. Along eastern boundary of E16 repair and strengthen the pine lines.</p>
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	<p><i>residents adjacent to Bridge End Road and local PRow, as well as screen the structures and reduce the perception of the Scheme from Badlingham;</i></p> <p><i>m. Parcels E24 and E25 – new woodland planting is proposed to the north, east and south of these parcels to screen the structures and reduce the perception of the scheme when travelling along Worlington Road;</i></p> <p><i>n. Parcels E26 to E29 – the solar panels have been located within the small scale fields and are offset from the boundary vegetation. This is to retain the landscape pattern and screen the panels from wider views;</i></p> <p><i>o. Parcels E30 to E32 – the woodland in the south-east part of the Site and around the field parcels has been retained for visual screening and retaining the vegetation cover. Additional hedgerow and woodland planting are proposed adjacent to Golf Links Road to screen views for motorists and from views from the wider landscape to the north, as well as reduce the perception of the Scheme in relation to Worlington.</i></p>	<p>Provide tree belt along north-western and southern boundary of E17 towards BESS in E18. (see VP16)</p> <p>E19-E22 Retain existing south-western hedge and plant tree belt behind, within the parcels, including pines. It does seem appropriate to reinforce pine lines/tree belts along the western boundary of E19. (VP21, VP21A) Water reservoir: Plant up the two triangular areas on the south-western side of the reservoir and the DCO boundary (locations for tree groups?) The woodland on southern side of E20 is now legible on the Environmental Masterplan. Strengthen internal hedgerows between E20 and E21 (see VP 20) and between E21 and E20. On the eastern side of parcels E20-E22 increase buffer between fence and solar panels to 30m and provide tree belt with hedgerows on either side for amenity purposes.</p> <p>E24-E25 Provide appropriate screen planting along western boundary of these parcels, incl. hedges and pines. Identify access points on Environmental Masterplan.</p> <p>E26 to E29 Provide hedge towards permissive footpath (along northern edge of parcels E26 and E27). Additional hedges should be included between the DCO limits and the track along the south of E28 and E29. (see VP22)</p>
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		<p>E30- E32 Provide return hedge planting at access into E30, in north-western corner. Provide hedge between E30 and E31 and between E31 and E32. Additional hedges should be allowed along the western boundary of E30. (seeVP22) It is unclear why in Yr15 'views of the upper parts of the perimeter fencing and upper parts of solar panel frames at the northern edge of E30' would remain visible from VP26A. Please clarify. Provide internal hedge within E31 to break up expanse of solar panels. Plant up entire north-eastern corner (outside developable area) of E32 with woodland, instead of tree belt only; oaks (see VP26A); (subject to archaeological constraints).</p>
<p>1.7.9</p>	<p><i>a. Parcels W01 and W02 – siting the solar arrays within a small part of W01 and W02, away from Chippenham Fen, the River Snail and Snailwell Road so as to reduce the visibility of the Scheme from motorists and conserve the landscape features of woodland and the river. New native wetland grassland is proposed across these parcels as a positive response to the adjacent RAMSAR site and in response to below ground archaeology</i></p> <p><i>b-g Parcels W03-W12</i></p> <p><i>h. Parcel W15– the solar panels have been offset from the</i></p>	<p>Removed from scheme.</p> <p>The Councils consider that the harm is too great and not capable of adequate mitigation and that these parcels should be removed from the scheme. Should the ExA be minded retaining these parcels, the Councils would like to comment in due course.</p> <p>W15 Mitigation around perimeter needs to be more robust. The offset from the</p>

	<i>watercourse, along with the retention of the riverside trees and vegetation and road networks. New woodland is proposed around the perimeter of the parcels to screen the Scheme, as well as to soften views of the A11 from Kennett and increase the vegetation.</i>	watercourse needs to be clarified, riparian vegetation should be strengthened. Proposed woodland/ tree belt should be extended along the southern boundary.
	Proposed Planting	
1.7.13	Please elaborate and justify in which locations and under what circumstances would non-native species be considered and which ones and why.	
1.7.15	The Councils consider that details on species mixes for proposed habitats, planting densities, specifications for plant material, sizes, planting establishment and maintenance should be developed for the OLEMP prior to consent. More needs to be done to develop a planting strategy for the different functions and locations of planting being proposed.	
1.7.17	please include the soils map in the Annex	
1.7.20	include trees and woodland	
1.7.21	Please update this paragraph to include references to further assessment work such the AIA etc.	
1.7.26	<p>This is a further increase in tree canopy removal from Technical Note issued at beginning of November 2022; please confirm that this is now the worst-case scenario and that there will be no further increases.</p> <p>Over 70% of the canopy that may be removed for the scheme is estimated to be of Category A or B trees.</p> <p>The loss of Category a and B trees should be quantified in numbers of trees, rather than area estimates, at least in the detailed stages of the project.</p> <p>For the trees that were not assessed in detail walkover site visits were only carried out 'where possible'. Please identify the criteria for 'possible', such as 'publicly accessible', and show on the tree plans those areas where no walkover site visits were possible, as this will indicate where information about trees is most limited.</p>	
1.7.28 and table 2	This information should have been included/ made available in the ES and in the BNG calculation. We would expect the applicant to do everything they can to minimise these losses back to the level that was quantified in the ES and that these efforts are evidenced.	
1.7.29	you don't say whether any veteran trees will be affected by the proposals. The Councils' view is that the LEMP fails to provide	

	<p>adequate protection or management of veteran trees. The root protection areas should be protected from any works with an overall enhancement to these features that are considered irreplaceable.</p> <p>The Arboricultural Impact Assessments identifies a number of tree works for veteran trees. The need for these works must be balanced with management for their ecological value (including potential for roosting bats). Such works should be incorporated into management objectives for veteran trees and undertaken through the lifetime of the development. Consideration should also be made to providing the next generation of veteran tree habitat, through new tree planting and veteranisation of existing tree stock (where appropriate)</p>
1.7.30	<p>removal of TPO trees is not acceptable particularly where they are also part of pine lines as is the case alongside the U6006 road. Alternative construction methods such as horizontal directional drilling should be considered particularly where the removal is required for installation of the cable. Any access should avoid the removal of protected trees.</p>
1.7.31 and table 3	<p>It is not clear why this table is included here. This information should have been included in the ES and in the BNG calculation. We would expect the applicant to do everything they can to minimise these losses back to the level that was quantified in the ES.</p>
1.7.32	<p>The proposals need to be made clearer. Where exactly are the 99ha and 60ha and why only 31ha of dry acid grassland? What about the remainder of the 'biodiverse habitats'?</p>
1.7.33	<p>This is too general. The LEMP should include objectives for delivery of habitat for the key breeding and wintering bird habitat within the site. This should demonstrate how these species will be adequately compensated.</p> <p>The RSPB has advised that the most appropriate way to manage solar farms for the benefit of birds, is to manage it for its invertebrates. However, this will not compensate for losses of breeding habitat for farmland birds (e.g. ground-nesting bird). And therefore off-site compensation needs to be explored.</p>
1.7.34	<p>This is too general.</p> <p>In addition, it is unlikely that a diverse sward will develop beneath the panels. ES chapter 3 [APP-035] states that Between each row of racks, the separation distance will be approximately 2m to 11m, dependent upon the local ground topography, to allow for appropriate maintenance. In the worst-case scenario where the panels are closely spaced, it is unlikely that there will be an opportunity for species rich grassland either under the panels or between them.</p>

1.7.35	This principle is not illustrated in the Environmental masterplan. It is unlikely that the management of field margins for arable flora is going to be possible unless an appropriate easement is maintained between these areas and the panels. The precise size and location of the replacement habitat should be clearly and consistently set out and the establishment of these areas and future management outlined.
1.7.36 onwards	Section on principles for the <i>creation of replacement</i> grassland and the section <i>species rich grassland under the solar panels and replacement of arable flora</i> – no comments are made as the Councils understand, based on discussions of 1.12.22, that this section is to be re-drafted. The OLEMP should cover all the different grassland habitats proposed and include all constraints that influence or impact proposed management, such as archaeological mitigation, management targets for key biodiversity features (e.g. arable flora, veteran trees, acid grassland, Stone Curlews other breeding and wintering birds).
1.7.50 – 1.7.52	<p>Arable flora plots are too small to be viable and cannot compensate for losses.</p> <p>A network arable field margins should be maintained across the site to mitigate / compensate for the loss of arable flora, including fields identifies of district importance for arable flora. Solar arrays proposed for fields of county importance for arable flora (W09) should be removed and the land managed for its arable flora. These should be shown on the Environmental Masterplan.</p> <p>Each arable field margin needs to be of sufficient size and located in optimal conditions (e.g. full sun and annual disturbance), where management is not compromised by proposed solar farm infrastructure, as well as stone curlew, archaeology and landscape mitigation. They should be positioned in areas that will not be seeded or receive herbicide treatment.</p> <p>Conflicts with management archaeological mitigation/ exclusion areas must be addressed. For example, is there a standard methodology for managing archaeological sites for arable flora?</p> <p>The Councils are also concerned that locating arable flora plots within the perimeter security fence are unworkable given the potential constraints to management (e.g. use of tractor to plough soils) in close proximity to the solar arrays. Further details are required to demonstrate how this might be possible. It would be more appropriate to have a wider field margin outside of the security fence that could be annually ploughed.</p>
1.7.53 and 1.7.54	Please identify figures/length for proposed new hedges and potential infill hedges separately on the Environmental

	<p>Masterplans and provide quantification estimates for new proposed hedges rows and estimated infill separately in the OLEMP. The specification for hedgerow planting conflicts with para1.6.37. Five plants per meter would be the preferred approach.</p> <p>The assumption of 11,100 plants falls short of what would be required if 7400m of hedge are planted at 5 plants per meter. The calculation for the number of hedgerow trees also falls short of what would be required if 7400m of hedgerow are to be planted.</p> <p>Please clarify whether the 2,200m refer to new hedge or infilling. 1.7.53 reads as if this was referring to the infill, being approximately one third of the total hedge planting. However, assuming that hedgerow trees would only be considered in stretches of new hedgerow, 110 trees at a distance of 20m ctrs. (1.7.54) suggests that the 2,200m refer to the newly planted hedges.</p>
1.7.54	<p>Suggest increased density of trees to allow for potential losses. Suggest 15m ctrs. approximately, but spaced unevenly.</p>
1.7.55	<p>The Plant Lists in Annex D do not refer to the different local character areas, as requested by the Councils, and are still too generic. They do not differentiate between character areas at all, not even on national character area level. Please provide appropriate indicative plant species lists for at least the three major landscape types.</p>
1.7.59	<p>The size of planting stock (hedgerow and hedgerow trees) is not consistent with the sizes indicated in Annex D.</p>
1.7.61	<p>Please explain this calculation in more detail and demonstrate how you arrive at a 5.3% increase in woodland cover. It does not seem appropriate to include retained woodland in the calculation for increases in woodland provided by the scheme.</p> <p>Please also provide details about the time frame needed for the replacement woodland to achieve the quality of the woodland and trees that were lost.</p>
1.7.62	<p>The size of planting stock is not consistent with the sizes indicated in Annex D. It is not clear from the planting density given what the spacing between plants will be (1.7m?). Please also provide planting grids in metre centres in this paragraph. The planting density should be refined according to the function of the planting. For example, it might be useful to have a dense shrub planting on the edge of some woodlands or tree belts where visual screening is required. This principle should be established in the OLEMP.</p> <p>There are some commercially available Dutch elm disease-resistant elm, such as Hiller's New Horizon. However, these species do not produce epicormic growth required by a number of elm specialist invertebrates. Therefore, their ecological benefit is unclear. However, there is a local elm cultivar of</p>

	<p>Cambridgeshire, namely the Huntingdon elm, which shows some resistance to Dutch Elm Disease. As a result, Huntingdonshire is a national stronghold for a number of elm specialist invertebrates. It has been used to create new habitat for key moth species around the county.</p> <p>It is unclear whether this cultivar is currently commercially available, however, a project could be incorporated into the LEMP to grow and plant some of this elm cultivar in appropriate locations around the scheme through the lifetime of the scheme (if ground conditions are suitable).</p>
1.7.63	<p>Individual trees are welcomed; however the proposals are unclear and more information is required including outline locations (for example Beck Road verge, field corner planting, the reservoir, site entrances?) to ensure that they are not in conflict with ecology and archaeological assets. These should be indicated on the Environmental Masterplans.</p>
1.7.64	<p>It would be better to refer to the Annex D. English Elm should be avoided as a specimen tree or where the purpose of planting is for landscape screening. Elm within hedgerows where it can be managed is welcomed. The inclusion of Elm within the site can be discussed further and the reintroduction of this species could be the subject of further project during the lifetime of the scheme.</p>
1.7.66	<p>Plant specifications should be as detailed as they can be now, i.e. species, stock sizes and provenance should be determinable now. Please expand on the beginning differentiation in planting palettes for different character.</p>
1.7.68	<p>Annex D – the species diversity for trees and woodlands falls short of what is expected for such a significant area of woodland and tree-belt planting. The Councils would like to see more detail of the expansion and tailoring of the species pallet with the OLEMP.</p>
1.7.69	<p>The Councils would like to see a dynamic establishment period incorporated into the OLEMP.</p> <p>The Environmental Masterplan shows areas of natural regeneration. There is no reference to this in the OLEMP and this prescription, which may be desirable in some locations where planting is not required for visual screening, requires some explanation.</p>
1.7.75	<p>The Councils believe that additional footpaths are required. Footpaths should be integrated so that they give local residents further opportunities for access to nature, but these routes and any existing footpaths should be managed to ensure that they do not contribute to disturbance of sensitive ecological habitats including the proposed offsetting areas. Some consideration in relation to establishing these routes and how they will be</p>

	managed is required within the OLEMP and Environmental Management Plan.
1.8.1 – 1.8.9 and 1.8.14- 1.8.21	This information does not clarify how the different types of grassland will be managed and is inconsistent with the table at Annex C. It is not clear why some grasslands are under the heading landscape and others under Biodiversity. The different types of management prescription in Annex C need to be outlined.
1.8.10	Maintaining all hedges at a height of 2-3m may not be appropriate in all areas, the approach to hedgerows needs to be more differentiated with regards to different locations and functions.
1.8.12	h. Schedules for various hedge management prescriptions should be included with the OLEMP.
1.8.13	c. the application of herbicides should tie in with 1.8.13 m. and only be carried out if necessary and after other methods have proved insufficient.
1.8.28- 1.8.31	The Councils' views on post construction monitoring is in the LIR [REP1-024] at 8.131-1.33 (biodiversity) and at 10.232 (landscape) and that a commitment to monitoring surveys should be secured in the DCO (LIR 8.201).
1.9.1	Please confirm whether the Environmental Clerk of Works would be on site throughout the construction phase.
1.9.3	As pointed out in the LIR, the Councils consider that Landscape Architects and Arboriculturists are not interchangeable, and both areas of expertise need to be represented. a. 'power station'?
1.9.4	The Ecology Advisory Group does not exist yet, as this paragraph would suggest. How will this group be formed and funded? It must also be made clear that the Applicant retains responsibility of delivery of the ecological mitigation / compensation proposed for this scheme, including any remediation works.
--	LEMP should include maintenance and regular monitoring of gaps in the perimeter fence, created for mammal access, to ensure they continue to allow free movement of mammals across the site throughout the operational phase
Table C1, Annex C	Please include proposed management of ECO4 and ECO5
Table C1, Annex C	Does the table only consider proposals within the sections of the fields with solar panels / inside the security fence? Map showing the boundaries for each field parcel would be beneficial. The table needs to be expanded to include all the field parcels outside of the solar areas. For example, land south of W09 (archaeological exclusion area) or north of E24 (proposed acid

	<p>grassland) – should these have specific parcel numbers? (e.g. ECO6 etc). As well as management of habitats outside the security fence.</p> <p>The management objectives, and constraints, for each parcel should be clearly identified</p>
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