



*ID Number: 20031377*

**Sunnica Energy Farm EN010106**

## **Suffolk County Council ISH2 Post-hearing Submission**

### **Deadline 4**

**16 December 2022**

#### **GLOSSARY OF ACRONYMS**

<i>DCO</i>	<i>Development Consent Order</i>
<i>ES</i>	<i>Environmental Statement</i>
<i>ExA</i>	<i>Examining Authority</i>
<i>ISH</i>	<i>Issue Specific Hearing</i>
<i>LVIA</i>	<i>Landscape and Visual Impact Assessment</i>
<i>NPS</i>	<i>National Policy Statement</i>
<i>OFH</i>	<i>Open Floor Hearing</i>
<i>PROW</i>	<i>Public Rights of Way</i>
<i>SCC</i>	<i>Suffolk County Council</i>

*“The Council” refers to Suffolk County Council, “The Councils” refers to the four host authorities: Cambridgeshire County Council, East Cambridgeshire District Council and West Suffolk Council.*

**PREAMBLE**

1. This submission provides further details on issues and queries raised at Issue-Specific Hearing 2 on Environmental Matters.

**THE COUNCIL’S COMMENTS ON ISH2**

<b>Topic</b>	<b>Suffolk County Council’s Summary of Oral Case and responses to questions</b>	<b>References</b>
<b>Agenda Item 1 – Welcome, introductions and arrangements for the Issue Specific Hearing</b>		
	<p>Suffolk County Council were represented by the following team in person:</p> <ul style="list-style-type: none"> <li>- Michael Bedford KC, Barrister, Cornerstone Barristers</li> <li>- Isaac Nunn, Senior Planning Officer (NSIPs), Suffolk County Council</li> <li>- Isolde Cutting, Senior Landscape Officer, Suffolk County Council</li> <li>- Andrew Murray-Wood, Senior Ecology Officer, Suffolk County Council</li> </ul>	
Update by the applicant on heritage matters and substation connection	<p>SCC notes that this agenda item has been overtaken by events. The ExA has since published (12/12/22) its “Rule 9 Procedural Decision regarding Applicant’s Second Change Request” on the PINS project webpage. The change request includes:</p> <ul style="list-style-type: none"> <li>- Removal of option 2</li> <li>- Removal of part of E05 (plane crash site)</li> <li>- Removal of West B</li> </ul>	REP3A-037

	<p>- Additional Archaeological Protection Area</p> <p><b>How can the changes be fairly introduced into the examination?</b></p> <p>The approach to consultation was discussed and SCC confirmed that it was satisfied that the change request could be made without further non-statutory consultation as the consequences could be dealt with in the examination. SCC therefore supports the ExA’s approach as announced in the Rule 9 Procedural Decision.</p> <p>SCC notes that a procedural decision has now been issued.</p>	
<p><b>Agenda Item 2 – Ecology and biodiversity</b></p>		
	<p><b>a. Adequacy of ecological surveys</b></p> <p>SCC Ecology Team endorse and defer to our colleagues at West Suffolk Council and Cambridgeshire County Council in their responses to these points (having been involved in various meetings and discussions in order to do so) and, in certain aspects (such as Stone Curlew) will respect the points made by Natural England in their statutory capacity as the Government’s advisors on biodiversity matters.</p> <p><b>b. Impacts on Stone Curlews and adequacy of proposed mitigation</b></p> <p>As above.</p> <p><b>c. Impacts on other ecological receptors and adequacy of proposed mitigation measures</b></p> <p>As above.</p>	

	<p><b>d. Impact on Chippenham Fen &amp; Snailwell Poor’s Fen and potential mitigation</b></p> <p>As above.</p> <p><b>e. Impacts on other designated sites and adequacy of proposed mitigation</b></p> <p>SCC understands that the “other designated sites” referred to are County Wildlife Sites, which are important sites of local biodiversity interest. These sites are protected from development by national policy (NPPF) and Local Plans (by all of the Districts and Boroughs) presuming against deleterious developments.</p> <p>There is an inconsistency in the way that the Havacre Meadows and Deal Nook CWS in Cambridgeshire is dealt with and those in Suffolk (Worlington Heath CWS and Badlingham Lane CWS) within the Framework Construction Environmental Management Plan [REP3-016]. Within that document, a 30 metre “buffer zone” is proposed for the Cambridgeshire CWS but nothing similar for the Suffolk CWSs. We would like to see this addressed by way of similar buffer zones being implemented for Worlington Heath CWS and Badlingham Lane CWS.</p> <p>SCC also considers that the treatment of the CWSs in the Framework CEMP should be more comprehensive and focused on what is appropriate in view of</p>	
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	<p>safeguarding the biodiversity interests of each site. At present the CEMP only addresses the Havacre Meadows and Deal Nook CWSs.</p> <p>Further, no monitoring of the CWSs in either County is proposed. We would like to see this reconsidered and a monitoring scheme of appropriate nature implemented.</p> <p>In addition, the Arboricultural Impact Assessment does not recognise or acknowledge the existence of County Wildlife Sites. This oversight must be addressed. We do not anticipate that it will affect the actual assessment of the trees and related features, but it may have significant impacts on the way that those features are treated and in the prescriptions for work, management and so on.</p> <p><b>f. Adequacy of mitigation measures in general; connectivity</b></p> <p>SCC repeats the comments made above about following the lead of West Suffolk Council and Cambridgeshire County Council but would add that, in respect of the Suffolk CWSs the hedgerow habitats are Suffolk Priority Habitats and provide important ecological connectivity to the wider landscape.</p>	
<p><b>Agenda Item 3 – Historic Environment</b></p>		
	<p>a. Heritage assessment</p>	

	<p>b. Impacts on Snailwell Fen historic landscape and proposed mitigation</p> <p>c. Impacts on Chippenham Park Registered Park &amp; Garden and adequacy of proposed mitigation measures</p> <p>d. Isleham plane crash site – impacts and potential for mitigation</p> <p>e. Impacts on conservation areas and their settings</p> <p>SCC has no specific comments on Item 3, but it notes from REP3A-036 (p.22) the Applicant’s intention to prepare a Heritage Environment Management Plan (to form a part of the LEMP). SCC will reserve any comments until it has seen and reviewed the HEMP.</p>	
<p><b>Agenda Item 4 – Landscape and visual impact</b></p>		
	<p><b>a. General points and methodology</b></p> <ul style="list-style-type: none"> <li>• <b>This project would not be an object within the landscape but will create a new landscape and place. A solar energy project of this scale is by its very nature inextricably linked to place making. Once this has been recognised, this can form the basis on which matters can be approached and resolved.</b></li> <li>• The magnitude of change in landscape character, amenity and to the sense of place, and the geographical and the temporal extent of the</li> </ul>	<p>[REP1-024, Joint LIR, 10.7, 10.10, 10.13, 10.15]</p> <p>[Applicant’s response is on p.76, REP3-019.]</p>

	<p>change result in such significant impacts and effects on the local landscape and on visual receptors that they would transform the existing rural landscape into a new renewable energy landscape.</p> <ul style="list-style-type: none"> <li>• In order for the scheme to become acceptable in landscape terms, the Council considers the following changes are necessary:             <ul style="list-style-type: none"> <li>- The removal of further parcels (in Suffolk E12, in Cambridgeshire W03 to W12, and the balance of E05)</li> <li>- For the remaining parcels, an improved design approach putting positive place making at its centre, as well as an improved, robust, and deliverable mitigation strategy which will deliver the successful integration of the new with the old.</li> </ul> </li> </ul> <p><b>Site selection process</b></p> <ul style="list-style-type: none"> <li>• <b>The Council cannot be confident that the chosen proposal sites are the most suitable sites, with the least anticipated harm and/or the best opportunities for mitigation of the harm.</b></li> </ul> <p>Reasons:</p> <ul style="list-style-type: none"> <li>• Did not include landscape and visual criteria (except Greenbelt and nationally designated landscapes),</li> <li>• The description of the site selection process appears to be in the negative, discussing the process for alternative site and why they may be less suited than the chosen DCO area, rather than providing a positive</li> </ul>	<p>[REP1-024, Joint LIR, 10.5-10.6]</p>
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	<p>approach that would outline what makes the DCO area the most suitable area for development.</p> <p><b>Methodology</b></p> <ul style="list-style-type: none"> <li>• <b>Suffolk County Council considers that the focus should now be on the question whether or not the proposed scheme can be made acceptable in landscape and visual terms.</b></li> <li>• The Councils disagree with some elements of the methodology, as well as the approach to and presentation of the Landscape and Visual Impact Assessment.</li> <li>• These concerns have been expressed in the Joint LIR.</li> </ul> <p><b>LEMP Rev 1</b></p> <p><b>The Council considers further revisions and improvements are required to the outline LEMP presented at deadline 3. The Councils will provide detailed comments on the outline LEMP separately by deadline 4. Points include:</b></p> <ul style="list-style-type: none"> <li>• Vision for Green Infrastructure strategy needs to be set out more clearly.</li> <li>• Management prescriptions need to be more detailed and tailored to the different sites and locations.</li> <li>• Plant palettes should be tailored to the different local landscape character types and habitats.</li> </ul>	<p>[REP1-024, 10.78-10.83, 10.145-146]</p> <p>REP3-012</p>
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	<ul style="list-style-type: none"> <li>• More detailed and differentiated information is required for buffers, plant spacing, proposed naturalisation, the representation of different types of grassland, differentiation between hedge infill and new hedge planting, impact avoidance on all veteran trees, etc. and woodland.</li> </ul> <p><b>Arboricultural Impact Assessment (AIA)</b></p> <p><b>Arboriculture matters are a matter for e the relevant District experts; However, Suffolk County Council does have significant concerns regarding the material presented to date at deadline 3.</b></p> <ul style="list-style-type: none"> <li>• The submitted AIA is beginning to address the insufficient information on landscape baseline referred to in the LIR. However, in its current form it is insufficient to be able to assess the potential harm to trees, including veteran trees, and woodlands as a result of the proposed scheme.</li> <li>• Assessments were carried out with a two-tier system for detail and accuracy, the criteria for which were inadequately explained and justified.</li> <li>• The TTP is difficult to read and does not present tree losses in a way that makes them easily recognisable.</li> </ul> <p><b>Environmental Masterplan</b></p>	<p>REP3-021</p> <p>[REP1-024, Joint LIR 10.83]</p> <p>REP3- 022</p>
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	<p><b>There is an ongoing dialogue between the Councils and the Applicant with regards to the Environmental Masterplans. Whilst the documents submitted at deadline 3 are an improvement, there are many further matters of detail that need to be resolved, such as:</b></p> <ul style="list-style-type: none"> <li>• It is not clear that all existing hedgerows are shown [see Applicant’s response to Joint LIR REP3-019, p. 35]</li> <li>• There is a need to show removed vegetation as well as proposed and retained</li> <li>• There is a need to include drainage proposals</li> <li>• Dialogue with Applicant is in progress with regards to scale and content of the Environmental Masterplan.</li> <li>• The Council advocates that the scale should be as for works plans (1:2500 @A1) to ensure legibility of required information content and to ease comparison with works plans.</li> </ul> <p><b>TPO Trees Location Plan</b></p> <ul style="list-style-type: none"> <li>• <b>All TPO trees and all veteran trees within and adjacent to the DCO area should be shown to inform the further design and management of these trees,</b></li> </ul>	<p>REP3-023</p>
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	<ul style="list-style-type: none"> <li>• <b>This information should also be included on the Environmental Masterplans and in the TPP.</b></li> <li>• Currently the TPO Trees Location Plan appears to only show TPO trees that are currently envisaged to be affected by the proposals.</li> </ul> <p><b>Application of national policy</b></p> <p>Counsel for the Applicant made a number of points on the application of national policy to the issues of landscape. SCC wishes to observe a number of general points as follows:</p> <ul style="list-style-type: none"> <li>• SCC notes at the outset that the proposal falls to be assessed under s.105(1) and (2) of the Planning Act 2008 and it is accepted by the Applicant that there is no NPS which “has effect” in relation to the proposed development: paras 1.4.4 to 1.4.5 of the Planning Statement [APP-261]; para 1.1.6 of the Statement of Need [APP-260].</li> <li>• It is common ground between the Applicant and the local authorities that both the current and draft energy NPS suites should be considered ‘important and relevant’ for the purposes of S105(2) of the Planning Act 2008.</li> <li>• Unlike S104, S105 contains no requirement that the Secretary of State must decide the application in accordance with any relevant national policy statement. Instead, the Secretary of State must have regard to important and relevant matters, which in our view include the NPS suite.</li> <li>• The national policy statements may not be the only important and relevant matters, or the only factors to which the Secretary of State must have regard. For example, the Secretary of State must also have regard to the Local Impact Report, which sets out local policy where relevant and provides detailed commentary on impacts. Though national policy statements are likely to be of considerable importance and relevance, it is nevertheless open to the Secretary of State to use his judgement in deciding the degree of importance and relevance.</li> </ul>	
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	<p>The Applicant also commented specifically on the application of national policy to the Councils’ proposed removal of parts of the scheme with particular reference to Sunnica West A. Although Sunnica West A is in Cambridgeshire, SCC is interested in the principle at issue and supports the views of the Cambridgeshire authorities as regards the impacts of these parcels and wishes to make the following points:</p> <ul style="list-style-type: none"> <li>• Counsel for the Applicant referred to para 5.9.14 of Overarching National Policy Statement for Energy (EN-1) which states that ‘local landscape designations should not be used in themselves to refuse consent, as this may unduly restrict acceptable development’ and noted that the Limekilns is not specifically designated in a local development document.</li> <li>• We argue that this analysis over-simplifies a more nuanced position. It is not the case that the Secretary of State is faced only with a binary choice: to accept in its entirety the whole of the proposal as put forward by the Applicant or to refuse it. It is also open to the Secretary of State to make a positive decision but for a modified form of the application proposal. That is clearly understood by the ExA, who sought views on that issue at ISH3 and the Applicant did not demur that such an approach was open. The reasons for requiring a modification can relate to concerns about any aspect of the proposal or about any aspect of its environmental impacts, including its impact on the local landscape and local views. The Applicant’s binary approach also understates the value of the landscape in question. Although the Limekilns itself is not a designated landscape feature, it is clearly ‘highly valued locally’ for the purposes of 5.9.14 as testified by interested parties at the OFHs and ISHs. It additionally has a close historic functional and landscape relationship with the Chippenham Park grade II Registered Park and Garden (RPG), which indicates a further source of value.</li> <li>• Para 5.9.21 notes that ‘[r]educing the scale of a project can help to mitigate the visual and landscape effects of a proposed project. However, reducing the scale or otherwise amending the design of a proposed</li> </ul>	
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	<p>energy infrastructure project may result in a significant operational constraint and reduction in function – for example, the electricity generation output. There may, however, be exceptional circumstances, where mitigation could have a very significant benefit and warrant a small reduction in function. In these circumstances, the IPC may decide that the benefits of the mitigation to reduce the landscape and/or visual effects outweigh the marginal loss of function.’ This advice is expressed in terms of examples rather than a specific policy test.</p> <ul style="list-style-type: none"> <li>• SCC accepts that whether certain parts of the scheme can be removed without making the overall scheme unviable is a ‘fact-sensitive’ question, but solar photovoltaic generation projects are inherently modular and each part of the site provides a proportional contribution to the overall benefit; a reduction in site area results in a proportional reduction in electricity generation. However, landscape impact is not generated evenly across the site, so removal of portions of a scheme (even considerable portions) can create landscape benefits which are disproportionately great compared to the loss of generation.</li> <li>• It is SCC’s view, as set out in the joint LIR, that the benefits of removal of those parts of the development which are recommended to be removed are likely to outweigh the marginal loss of function, but accepts that the Secretary of State will need to apply their own judgement on a case-by-case basis.</li> </ul> <p>Whether or not removal of any given portion is judged to be appropriate, it is still necessary to consider ways to either mitigate or compensate for impacts. This is supported by policy:</p> <ul style="list-style-type: none"> <li>• Para 5.9.17 requires the Secretary of State to ‘consider whether the project has been designed carefully, taking account of environmental effects on the landscape and siting, operational and other relevant constraints, to minimise harm to the landscape, including by reasonable mitigation.’</li> <li>• For a more detailed discussion of compensation, see SCC’s submission at deadline 4: Response by Suffolk County Council to Action Point No. 8</li> </ul>	
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	<p>Consequent Upon ISH2 On Environmental Matters, in particular at para 16.</p> <p><b>b. Snailwell Fen – combined impacts on landscape and adequacy of proposed mitigation measures</b></p> <p>Snailwell Fen is located within East Cambridgeshire. Suffolk County Council welcomes in principle the proposal by the applicant (submitted at Deadline 3A, 28 November 2022) to remove Sunnica West B from the proposals (with exception to the cable route), provided that this does not result in negative effects for Suffolk, by limiting options for required changes to the extent and layout to the proposals (including mitigation), within West Suffolk</p> <p><b>c. Impact on views from the Limekilns and Water Hall Gallops and impact on the landscape character of the area; potential for mitigation</b></p> <p><b>The Council supports the position of Cambridgeshire County Council/East Cambridgeshire District Council that Sunnica West A needs to be substantially reduced, via removal of parcels W03 to W12. This is because the impacts of these parcels are not capable of effective and appropriate mitigation. Whilst Sunnica West A is in Cambridgeshire, it will be visible from parts of Suffolk, most notably along the county boundary at the Limekilns, where the B1506 (Well Bottom) forms the administrative boundary for the</b></p>	<p>[REP1-24, Joint LIR Table 6, p.122; 10.138]</p> <p>Joint LIR 10.119- 10.121; 10.148;</p> <p>Joint LIR 10.138; 10.176</p>
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	<p><b>most part. Whilst this road is mostly hedged there are gaps and views towards Sunnica West A from vehicles and other traffic (especially higher vehicles) travelling along it (within Suffolk).</b></p> <p><b>However, with excellent design and mitigation that is appropriate for the historic landscape it may be possible for W17 to become acceptable in landscape terms and therefore be retained. However, the challenges will be considerable.</b></p> <p><b><i>Impact on views</i></b></p> <p>Limekilns and Water Hall Farm Gallops are identified in the ES as Local Landscape Character Area 26 Limekilns and Gallops which is in East Cambridgeshire.</p> <p>Viewpoint 38 demonstrates that through openings in the hedge along Newmarket Road, views from the Suffolk /Cambridgeshire border are available. The proposals for Sunnica West A would therefore be visible from West Suffolk. In these locations, the views to the middle distance would be dominated by views of solar arrays and associated infrastructure, which would result in long-term significant adverse effects on these views.</p> <p><b><i>Potential for mitigation</i></b></p>	<p>Joint LIR 10.7, 10.8, 10.9, 10.13, 10.14,10.5, 10.16, 10.161</p> <p>Joint LIR, 10.165</p>
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	<p>Because of the undulating landform, the characteristic openness of the landscape and the constraints resulting from the historic aspects of the landscape around Chippenham Park, the potential for visual mitigation for views from Suffolk is limited. Mitigative planting that would achieve screening or filtering of the views from Limekilns and Water Hall Gallops would be inappropriate for the character of the historic landscape, which is predominantly open, with small woodland blocks, and would result in further detrimental effects on the historic landscape and its character.</p> <p><b>d. General impacts on the landscape of the area; potential for mitigation and impact of mitigation proposals on the landscape</b></p> <p>The Council notes the intention of the ExA to deal with this matter later in the Examination. The concerns with regards to general impact on the landscape of the area have been expressed throughout the Joint LIR.</p> <p><b>General impacts on the landscape of the area:</b></p> <ul style="list-style-type: none"> <li>• <b>Loss of Landscape features:</b> trees (including TPO trees and irreplaceable veteran trees), parts of woodlands, hedgerows, scrub, arable flora and arable land, loss of legibility of pine lines</li> <li>• <b>Impacts on perceptual qualities of the landscape:</b></li> </ul>	<p>Joint LIR, 10.144</p> <p>[Applicant’s response REP3-019, pp. 88-91]</p>
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	<ul style="list-style-type: none"><li>- Temporary impacts on tranquillity during construction</li><li>• <b>Impacts on recreation and public use of the area</b></li><li>- Temporary closures/diversions of PRoWs</li><li>- Temporary road closures</li><li>- Long-term or permanent changes to views and amenity</li><li>• <b>Changes to the local landscape character:</b></li><li>- Change of large tracts of rural landscape areas round the settlements of Worlington, Freckenham, West Row, Chippenham, Isleham and Snailwell to a new renewable energy landscape.</li><li>- Impact on and partial loss of the largely open character of the project area, including truncation of views, both to landmarks and across the wider landscape, because of the proposed mitigation to screen the solar plant.</li><li>- Change to character of secondary and unclassified roads (Elms Road, U6006), resulting from road widening and alteration schemes, and the creation of access and crossing points to enable the development. [U6006 will not be widened but works may be necessary to facilitate crossing]</li><li>- The Council considers that the accumulation of Minor and Moderate Adverse Effects to result overall in Significant Adverse Effects</li></ul>	
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	<p><b>Potential for mitigation and impact of mitigation proposals on the landscape</b></p> <ul style="list-style-type: none"> <li>• The potential for mitigation and the potential impacts resulting from the mitigation proposals varies across the DCO site.</li> </ul> <p><b>Suffolk</b></p> <ul style="list-style-type: none"> <li>• For the parts of the project located within Suffolk, the potential for mitigation of the visual impacts of the scheme varies, but the proposals for mitigation thus far remain insufficient.</li> <li>• <b>Overall, mitigation planting needs to be more robust and make greater efforts to integrate the new with the old.</b></li> </ul> <p><b>Sunnica East A</b></p> <ul style="list-style-type: none"> <li>• Between Beck Road and the northern scheme Boundary (at E01), the development scheme does present an opportunity to make Lee Brook more legible in the landscape (views from Isleham/Beck Road) by providing a river restoration scheme, including appropriate tree planting. Better screening also needs to be achieved for views from West Row and the River Lark (the latter to the north-west of the scheme).</li> <li>• Parcels E01-E04:</li> <li>• Clarify width of buffer/setback form Woodland north of E01 and E02 (suggest 20m).</li> </ul>	
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	<ul style="list-style-type: none"> <li>• Increase distance/ buffer between Lee Brook and western boundary of E01 and E03 and provide additional riparian planting in form of a river restoration scheme (suggest 30m). The buffer should be sufficient that the Lee Brook remains legible in the landscape.</li> <li>• Depending on what type of structures are envisaged for E04, it should be considered if, with appropriate adaption of the proposed mitigation, views from the residential properties on Ferry Lane to The Ark and St Andrew’s Church in Isleham could be retained. (see VP2C)</li> <li>• Parcels E08-E10:</li> <li>• At E08 and E10 the photomontage suggests wider set back from Ferry Lane than the Landscape Masterplan. (see VP12A)</li> <li>• The woodland between E08 and E33 needs to be wider/deeper as views are far reaching towards the BESS.</li> <li>• There should be a tree belt/woodland along the western side of E33 (Bess and substations) (see VP1, VP6, VP7).</li> <li>• Subject to archaeological constraints, there appears to be room 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)</li> </ul> <p><b>Sunnica East B</b></p>	
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	<ul style="list-style-type: none"> <li>• The <b>U Road U6006</b> corridor should not form part of the proposals and should be left intact. Access roads for the solar parcels should be located within the parcels and there should <b>only be one crossing point</b>, where a natural gap in the vegetation presents itself. <b>For any cable route crossing HDD would be expected.</b></li> <li>• As there is an irreconcilable conflict between the requirements of landscape planting for amenity (screening) and the requirements for ecology, to be realised in ECO3, <b>E12 should be omitted from the scheme</b> and be made into grassland for ecological enhancement. Failing this, it would be important to provide hedging, not only around the north-western, but also the north-eastern boundary of E12, for the amenity of PRow users.</li> <li>• Additional mitigative planting is required along the western boundaries of E24 and E25 in form of shelterbelts.</li> <li>• E30-E32 need to be better integrated into the landscape. This should include additional internal hedgerows in E31 and more robust planting along the northern and south-eastern edge of E32. The corner into Golf Links Road should be accentuated with large trees.</li> </ul> <p><b>e. Specific impacts on visual amenity around land parcels E19, E20, E21 and E22 (south of Elms Road) and potential for mitigation</b></p>	<p>Joint LIR 10.123</p>
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	<ul style="list-style-type: none"><li>• <b>The mitigation proposed to date does not appear robust enough to adequately mitigate the visual effects for neighbouring properties within the short to medium term. However, the Council considers that adequate mitigation should be achievable within the landscape.</b></li><li>• <b>The Council suggest that the solar panels of E20, E21 and E22 should be set back no less than thirty meters from the south-eastern boundaries and that a tree belt should be provided, with a hedge line on either side, and including pines.</b></li><li>• Further notes on Elms Road:</li><li>• Retain and strengthen existing hedgerows and tree lines.</li><li>• The roadside hedges are slimmer and less solid than depicted in Section 5 – 5’ and require strengthening; proposed woodland planting proposed needs to be deeper.</li><li>• The proposed entrance from Elms Road would appear to result in 215m of hedgerow lost on either side to visibility splays. Of these the south-eastern stretch is important for the screening of E18 and the BESS. This is likely to make the visual impact on Elms Road worse and prolonged, and needs to be addressed.</li><li>• Retain existing south-western hedge along the boundaries of E19 and E22 and plant tree belt behind, within the parcels, including pines.</li></ul>	
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<b>Agenda Item 5 – In-combination impacts</b> (ecology & biodiversity, historic environment and landscape & visual impact)		
<b>Not dealt with at this hearing but we can make representations by deadline 4</b>	<p><b>a. Land parcels W01; W02; ECO4;</b> No longer proposed.</p> <p><b>b. Land parcels W03; W04; W05; W06; W07; W08; W09; W10; W11; W12; W17; ECO5</b> These parcels are located within East Cambridgeshire. The requirements for visual screening are irreconcilable with the constraints within the historic landscape around Chippenham Park. Intermittent views though the roadside hedge would be available from the Suffolk/Cambridgeshire border along the B1506. This would mainly affect footpath users.</p> <p><b>c. Land parcel E05</b> Land parcel E05 is largely located in Cambridgeshire. Conflicting requirements for landscape public amenity/recreation, historic environment and ecology. In this respect the Councils’ preferred option is to apply the mitigation hierarchy and avoid harm, by removal of E05.</p> <p><b>d. Land parcels E12 and E13</b> Conflicting requirements for landscape and ecology. In this respect the Councils’ preferred option is to apply the mitigation hierarchy and avoid harm, by removal of E12 and E13.</p>	<p>Joint LIR, 10.198</p> <p>Joint LIR, 10.175, 10.203 to 10.205</p>
<b>Agenda Item 6 – Next steps</b>		

SUNNICA ENERGY FARM – SUFFOLK COUNTY COUNCIL – DEADLINE 4 SUBMISSION

	<p>SCC has provided a response to Action Point 8 as a separate submission at Deadline 4</p>	
<p><b>Agenda Item 7 - Close of the hearing</b></p>		
	<p>SCC noted that agenda items 4d and 4e will be deferred and handled via written representations and that item 5 will be deferred to be addressed at further Issue Specific Hearings scheduled for February 2023.</p>	