



30 January 2023 – Deadline 6

Application by Sunnica Ltd for an Order Granting Development Consent for the Sunnica Energy Farm Project EN010106

This document sets out the comments on the Applicant's Deadline 5 (D5) submissions by West Suffolk Council (WSC). The tables below set out the document in question that the Council is commenting on, together with the relevant paragraph or reference number.

Except where expressly stated otherwise below, the Council reiterates and relies on its comments submitted to the ExA at previous deadlines.

8.47 & 8.77 Environmental Masterplan [REP5-054 & REP5-061-064]

Topic	Paragraph Number	Council's Comment
General		The Environmental Masterplan is not complete. The applicant in their response to the Applicant's Response to Local Planning Authorities Deadline 4 Submissions section, page 110 [REP5-057] highlights some matters that they state will be resolved at a later date after a workshop with the Councils which is to happen on the 31 January. Whilst the Councils made it clear [REP4-146] that they 'are happy to engage further in the development of the Environmental Masterplan', many of the outstanding matters are ones that could be resolved by the applicant without reference to the Councils as they are a matter of fact (existing PRoW) or the matters relating to the applicant's design (proposed

		drainage features, different planting types for example woodland, tree lines, shrubs and pine lines). The Council sees no reason why the document is incomplete and is concerned about the diminishing opportunities for issues to be resolved and available for review.
Hedgerows	All sheets Sheet 5 Sheet 4	Hedgerow losses are not shown. The hedgerow within ECO3 to the east of E12 is in fact a pine line. The proposed hedgerow to the south of E09 and E10 is an 'existing hedgerow', shown to be removed on a previous iteration of the AIA sheet 15 [REP3-021]. The Councils are unclear about the proposals for this existing hedgerow.
PRoW	All Sheet 3 Sheet 7 and 8	Existing PRoW in the vicinity of the site have not been shown to demonstrate connectivity. Existing PRoW within the DCO site at ECO2 is not shown. The PRoW 'around the perimeter of E19 and E22' as stated in the OLEMP is not clear on the plans. There is an existing PRoW on the southern edge of E22 and E19.
Stock proof fencing ECO1, ECO2, and ECO3	Sheet 2 and 3 Sheet 2	This is not consistent with the measures in the 'Offsetting Habitat Provision for Stone Curlew Specification' [REP5-047] and the impact of fencing on archaeology should also be considered. It is not clear why a fence is proposed between ECO1 and ECO2.
Woodland planting south of E18	Sheet 7	An additional width of woodland planting is welcomed however this is not demonstrated in Figures 3 or 12 of the OLEMP [REP5-012] and other than as illustrated on the Environmental Masterplan there is no description of the width of this woodland buffer. It is not clear which other woodland blocks have been widened.
Beck Road landscape set back	Sheet 2	The setback of the scheme from Beck Road has been reduced on the Environmental Masterplan to 80m from 110m as was previously the case and shown in the landscape masterplan Figure 2 of the OLEMP[REP5-012].
Pine lines	General	These features are not shown on these plans as requested, neither are they shown on any other plans.

Veteran trees	General	These are not accurately shown on the plans. For example, trees to the south of E13 are missing (sheet 5), and the tree to south of E15 (sheet 7) appears to be in the wrong location when compared to the AIA.
TPO trees	Sheet 5	These are either not shown on the plans as requested or are lost beneath other layers so are not clearly visible.
Existing grassland	Sheet 5	Existing grassland to be retained is not consistently shown, for example within ECO3 (when compared to the Figure 6 of REP5-047).
Arable Flora	Sheet 6 and 7	The proposed provision of arable flora habitat appears inadequate and restricted given that arable flora are widespread across Sunnica East.

8.46 Arboricultural Impact Assessment Report (Tracked) – Rev 01 [REP5-053]

Topic	Paragraph Number	Council's Comment
Completeness of the baseline tree data	7.3.6	It remains the case that 53% of all tree canopy cover to be removed has only been assessed via desk study and walkover review (where feasible), rather than by detailed tree survey. The Council is disappointed that a full tree survey has not been undertaken given the Council's request for this in response to the PEIR.
Impact on TPO trees	7.3.10	The AIA states in relation to TPO trees on the U6006 Road that 'The potential for these trees to be retained will be reviewed as part of the detailed design process and this is secured as a commitment in the FCEMP'. The Council does not consider the wording in the FCEMP to reflect this commitment. It states 'The Arboricultural Report will also explain how impacts to the TPO trees identified as being impacted by the Arboricultural Impact Assessment have been minimised as far as reasonably practicable'.
Trees within CWS	7.3.12	This statement does not appear to be accurate. Refer to FCEMP [REP5-044] page 16C-20.

6.2 Appendix 16E Framework Decommissioning Environmental Management Plan (Tracked) [REP5-009]

Topic	Paragraph Number	Council’s Comment
Habitat restoration	Page 16E-12	The council welcomes “ecological mitigation and enhancements measures installed pursuant to the detailed LEMPs will be left in situ”. However, this should also include management of these features during the decommissioning phase

6.2 Appendix 16M Habitats Regulations Assessment: Report to Inform an Appropriate Assessment – Rev 02 [REP5-045]

Topic	Paragraph Number	Council’s Comment
Cumulative effects	Table 4-3	<p>In the LIR section 8.68-8.71 the Council identified projects that it considered have the potential to act in combination with this application. The following is an update on those projects:</p> <ul style="list-style-type: none"> • The Council’s concern in relation to FHDC site allocation SA4 remains. • Update on DC/21/0217/FUL ‘Commercial polyhouses’ (located immediately south of E28, E29) – An offsetting site for stone curlew has been located and agreed in principle with NE (located south of E30, E31 within 500m of the DCO site). The Council agrees that if the measures in the FCEMP [REP5-044] page 16C-15 are implemented, in-combination effects during the construction period will be avoided. However there remains the potential for operational effects to occur as the FOEMP is not consistent with the commitment in the Offsetting Habitat Provision Specification [REP5-047] section 4.1.40 in relation to the population of Stone Curlew present within 500m of the DCO scheme’. • Update on DC/21/1621/HYB ‘Bexwell to Bury St Edmunds Pipeline’ – Within West Suffolk a planning permission has been issued and

		<p>construction effects are controlled by an agreed CEMP which requires pre-construction SC survey to be undertaken within 500m of the pipeline corridor.</p> <p>Planning permission has not yet been issued in East Cambridgeshire where the pipeline will be located approximately 70-80m from parts of ECO1 and EC02.</p>
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6.2 Appendix 16F Framework Operation Environmental Management Plan (Tracked) [REP5-010]

Topic	Paragraph Number	Council’s Comment
<p>Operation activities – ‘maintenance’</p>	<p>2.1.1</p>	<p>The Council notes the additional wording that has been attached to this provision, which requires the Applicant to notify the relevant planning authorities of planned maintenance. The Council considers that this wording is somewhat vague and does not fully address the Council’s concerns regarding the definition of maintenance.</p> <p>The Council would suggest that this provision is worded as follows:</p> <p>“Every 12 months from the date of final commissioning of each phase, the Applicant will submit a planned maintenance schedule for the year ahead to the relevant planning authorities, excluding unforeseen emergencies that require maintenance throughout the year. The annual planned maintenance schedule shall include the following details as a minimum: the extent and nature of the scheduled maintenance; the proposed timing of such maintenance; and the environmental effects that are likely to arise as a result of such maintenance. The Applicant will further notify the relevant planning authorities of any maintenance that has been undertaken as a result of unforeseen emergencies. Such notification shall be given as soon as practically possible but no later than 14 days from the emergency maintenance being carried out. Such notification shall include the following details as a minimum: the extent and nature of the maintenance”.</p>

Badger sett monitoring	Table 3-3, page 16F-7	Is this still required as there is no new sett created?
Invasive Species management Plan	Table 3-3	ISMP is not included as required in the OLEMP section 4.2.42.
Monitoring of Stone Curlew		The commitment in the FOEMP is not consistent with the commitment in the Offsetting Habitat Provision Specification [REP5-047] section 4.1.40 which states that the 'The use of the Stone-curlew offsetting areas will be monitored annually for the lifetime of the Scheme, <u>along with the population present within 500m of the Scheme</u> '.

6.6 Offsetting Habitat Provision for Stone Curlew Specification (Tracked) [REP5-047]

Topic	Paragraph Number	Council's Comment
General		<p>The document does not take into account the archaeological constraints of the Stone Curlew Offsetting habitat (ECO1, ECO2 and ECO3) as identified within Cambridgeshire County Council and West Suffolk District Council's response to question ExQ2 2.2.6 [REP5-079] and [REP5-085], respectively.</p> <p>The Council is concerned there will be residual adverse impact that cannot be compensated either on-site or off-site due to the very bespoke management required for Stone Curlews and constraints of the wider landscape (including archaeology of high importance) and therefore planning requirements / obligations may be insufficient to address this adverse impact.</p> <p>Stone Curlew is a principal importance for conservation of biodiversity in England (priority species) and is also protected by Schedule 1 of Wildlife & Countryside Act, 1981 as amended therefore the impact on this species should be considered in accordance with paragraph 5.3.17 of National Policy Statement EN-1 which states that "the IPC should refuse consent where harm to the habitats or species and their habitats would result...". This is the case unless the Applicant is able to redesign the scheme to avoid adverse effect on this species.</p>

Arable reversion		The methodology for reducing the nutrient level of the land for ECO1 and ECO2 is not clearly set out.
ECO1 nesting plots	Table 4-1 and 4.1.10	The proposal for providing nesting plots in ECO1 is not consistent with guidance and does not appear to include annual cultivation to create disturbance; the proposal is to provide bare ground/short sward through manual removal of weeds. It is not clear what 'ploughed field conditions' means? It is understood that bare ground nest plots through annual cultivation could be provided in the two trenched areas (figure 4 of the HEMP) to the south of ECO1 (not extending beyond the trenched areas) which is not consistent with the plots shown on the Environmental Masterplan.
ECO1 arable reversion	Table 4-2	It is the Council's understanding that ECO1 has not been ploughed for a number of years by the landowner and given the significance of the archaeology within this area, 'standard minimum tillage cultivation' would be more appropriate for seeding the area.
ECO2 arable reversion	Table 4-4	With the exception of the areas trenched to establish where Stone Curlew nest plots can be located, given the archaeological interest within ECO2, including a burial mound, it is understood that 'standard minimum tillage cultivation' should be implemented.
Arable reversion ECO3		The archaeological interest within ECO3 has not been fully investigated. The area has been shown to contain some archaeology through geophysical survey but has not been evaluated. No trial trenching has been undertaken to determine if there are archaeological assets that need to be avoided or mitigated. Therefore, the acceptability of skimming the topsoil from these areas, and the location of bare ground disturbed plots remain uncertain until this further archaeological investigation is undertaken.
Establishment of grassland	4.1.12, 4.1.20, 4.1.28	It is not clear why grazing cannot be introduced to the Stone Curlew offsetting land in the short term. Aftercare and management guidance for Emorsgate EM5 states that grazing can occur in the second and subsequent years.
Management of Worlington Heath CWS	Table 4-6	There is no prescription for the management of Worlington Heath CWS in the OLEMP, neither is there a prescription for the management of other areas including lowland dry acid grassland which is a priority habitat [APP-079]p8C-36.

Anti-predator fencing	4.1.31 and 4.1.33	The requirement to bury predator fencing in the ground by 25cm is likely to be a challenge given the significance of the archaeological assets within ECO1 and ECO2 particularly if it is to be constructed annually. The parameters in 4.1.33 should be checked for accuracy.
PRoW to the southeast of ECO2 and the U6006	4.1.35	There is currently no hedgerow between the existing PRoW and the field ECO2 and no hedgerow proposed on the Environmental masterplan. The existing route skirts the perimeter of the field on an existing dirt track. No planting is proposed on the northern boundary of the U6006 road with ECO3.
Monitoring – objective of the stone curlew offsetting area	4.1.36 and 4.1.38	The Council considers that the objective of the offsetting area should be based on outcome, such as that mentioned by NE in their response to EXQ1 1.2.6 that 'the offsetting land can only be considered successful if there is no net loss of stone curlew in and around the scheme'. The baseline population should be the population prior to construction and operation – currently considered to be 5 pairs but not yet agreed.
Effectiveness of the offsetting land	4.1.40	It is not clear what contingency is in place for the case that the offsetting land is not effective for any number of the reasons including recreational disturbance, presence of solar panels, quality of the habitat created. This is particularly pertinent for those areas of the offsetting provision which are also being managed for archaeology and where remedial actions would be limited and subject to further agreement for example with the county archaeologists.

8.71 Applicant's response to ExA Second Written Questions [REP5-056]

Topic	Paragraph Number	Council's Comment
Principle and nature of development	Q2.0.11	The Council endorses the comments made by SCC in respect of the Applicant's answer to Q2.0.11

8.72 Applicant's response to LPA Deadline 4 submissions [REP5-057]

Topic	Paragraph Number	Council's Comment
TPO trees	P114 row 3	The changes suggested by the applicant would allow the LPA to have a degree of protection in agreeing the detailed design of the proposals (although it appears that the applicant has already taken the decision to fell a number of TPO trees). However, during operation of the proposals, it is the Council's view that there would be no protections and no consent required should the applicant decide to fell or lop a TPO tree. This remains unsatisfactory.
Acid grassland	P18	The applicant states that 'the loss of 0.8ha of acid grassland will be in the south-east corner of E13. This small area of turf will be translocated into ECO3, where it will help establish the creation of further acid grassland'. There is no inclusion of turf translocation within the OLEMP or within the Offsetting Habitat Provision document.
Arable Flora update	P124	<p>The purpose and scope of the walkover survey is unclear, and no plan is included showing the area covered or the location of the notes.</p> <p>The survey work was undertaken in September 2022, which is outside of the optimal botanical survey seasons, particularly for arable flora that are normally surveyed in late spring. The survey work also followed a prolonged period of drought. Given the constraints, what level of confidence can the Applicant give the findings of the results?</p> <p>The Council's view is that the only conclusion that can be made from the walk-over is that notable arable flora are well spread across the Development Site. The presence of arable flora is dependent on arable cropping pattern. Mitigation / compensation will be required to address the loss of arable flora from across the entire site. The current proposal for three areas of compensatory habitat for arable flora is considered insufficient.</p>

6.2 Framework Construction Environmental Management Plan (tracked) [REP5-044]

Topic	Paragraph Number	Council's Comment
Precautionary working method statements	16C-17	The CEMP says 'Precautionary working method statements, informed by the CEMP(s), will be produced by the appointed contractor to specify working requirements and other impact avoidance measures. These will be controlled and implemented through the CEMP(s)'. It is presumed that they will be informed by the OLEMP/LEMP and pre-construction site surveys?
Hedgerows	16-34	It is not sufficient for the CEMP to state 'The CEMP will explain how hedgerows which are to be retained shall be protected, retained and maintained during the construction phase'. Outline measures should be included.
Drainage within the tree constraints areas including RPA's	Table 3-4 and table 3-5	The tables do not appear to secure the commitment in the AIA section 7.5.3 [REP5-053] that all proposed drainage 'will be positioned to avoid the area of constraint associated with retained trees'.
Veteran trees	Table 3-5 page 16C-36	The wording in the FCEMP should be amended to fully reflect the Applicant's commitment in the 'Applicant's Response to Local Planning Authorities Deadline 4 Submissions' [REP5-057] page 117 that 'veteran trees identified will not be impacted by the Scheme'.
Pre-construction bat survey		The following commitment, set out in the Applicant's response to LPA Deadline 4 Submissions [REP5-057] should be included in the FCEMP: 'Following the provision of the detailed Arboricultural Method Statement and prior to the commencement of any tree works, where necessary, further inspections for bats will be undertaken. This would include updated roost assessment, presence or likely absence survey (e.g. tree climbing and/or dusk emergence) and if necessary, the obtaining of a mitigation licence for the proposed works where impacts to roosts are identified'.

6.2 Appendix 10I Outline Landscape and Ecology Management Plan (Tracked) Rev 02 [REP5-012]

Topic	Paragraph Number	Council’s Comment
General		<p>In the LIR, the Councils raised concerns that the OLEMP would not be effective in delivering and securing well designed green infrastructure, which could provide a framework in which the development would sit (LIR 10.194). In relation to ecology and biodiversity, the Councils raised concerns (LIR section 8.52) about the heavy reliance in the ES of the Framework CEMP, OEMP and OLEMP because these documents are lacking clarity, detail and in some cases are inconsistent (LIR 8.85, 8.87, 8.98, 8.99, 8.166-8, 8.176).</p> <p>Key themes in the Councils’ criticism of the OLEMP were the lack of information on grassland management (LIR 8.167, 8.178, 8.179, 8.192, 10.192, 10.196) and the species diversity and function of planting (LIR 10.160, 10.191, 10.197) both of which should be tailored to suit the changing landscape character and soil conditions, and monitoring of the proposals including in the long-term (LIR 8.131, 8.134)).</p> <p>The OLEMP submitted at deadline 4 has been re-structured, which is welcomed, however the document remains incomplete (see section 5.1.2 of the OLEMP). A particular omission is prescriptions for the management of habitats to reach their target condition as set out in the BNG calculation, and many inconsistencies remain including but not limited to the following:</p> <p>Omissions</p> <ul style="list-style-type: none"> • Precautionary measures for CWS • Precautionary measures for Stone Curlew during construction • Management of elm in hedges • Establishment of acid grassland through turf translocation • Management for arable flora

		<ul style="list-style-type: none"> • Habitat creation and management for lowland farmland birds – Skylark (up to 98 breeding pairs recorded across the site), Turtle Doves, Lapwing, Yellow Hammer, Barn Owl, Corn Bunting, Quail, Little Ringed Plover • Management of Badlingham Lane CWS • Management of Worlington Heath CWS • Outline prescriptions for management of the several types of grassland including acid grassland, rush pasture, calcareous grassland • Outline prescriptions for management of grassland by conservation grazing, general grazing, grassland management for pollinators (B Lines) • Grassland management for retention and conservation of archaeology • There is no inclusion of enhancement of water features • Establishment and management of Swales and infiltration basin features. • Control of lighting across the order limits during operation. <p>Inconsistencies</p> <ul style="list-style-type: none"> • Species of local provenance – section 2.1.3f with section 5.3.5 • Species licences – section 4.1.8h, 4.2.6, 4.2.3 • Hedgerow planting – sections 4.2.12 and 5.4.6. Suggest 5.4.6 is most appropriate • Specification of planting stock – section 5.4.7 and table D2, 5.4.8 and table D1, section 5.5.7-8 and table D3 • Entrapment of fauna – 4.2.33 and 4.2.40 • Hedgerow management – 5.4.11 and 5.4.13 • Hedgerow management – section 5.4.12b. Whilst coppicing and laying of hedges are considered good practise in so far as hedgerow management is concerned, there may be conflict with the landscape screening function of hedges. It is not clear how this has been taken into account in the landscape visual assessment. Can the hedgerows which are to be managed I this way be identified. • Planting structure in section 5.5.3i-iv and range of species to achieve this in table D3 • Mixed scrub is also proposed in E02 and edges of proposed woodland – section 5.6.1 and Environmental Masterplan, 5.6.3 • Fencing of ECO1-ECO3 – section 5.8.2 and 5.9.15b and REP5-047 • Wildlife boxes – section 5.8.11-16 and 5.9.1-2
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		<ul style="list-style-type: none"> Monitoring of Stone Curlew – section 6.1.5 and section 4.1.39 and 4.1.40 of the Offsetting Habitat Provision Specification [REP5-047] <p>The Overarching National Policy Statement for Energy (EN-1) 5.3.15 highlights that the decision-maker will need to consider what appropriate requirements should be attached to any consent in order to ensure that any mitigation or biodiversity net gain measures are delivered and maintained. The Council's view is that the mitigation measures including for many priority species are not secured in the current OLEMP pursuant to requirement 8.</p>
Alternative measures	2.1.4	The Council considers that any alternative measures must not deviate significantly from those assessed in the Environmental Statement and the Council should be satisfied that they would achieve the same effect.
Relationship between the OLEMP, CEMP and OEMP	2.1.5	The Applicant should provide an explanation of how the LEMP also relates to the CEMP and the OEMP.
Avoidance of landscape impact of structures	4.1.9	Refer to DCO Requirement 6. See also 5.2.1 – these measures should also be secured through Requirement 6. Will Environmental Colour Assessment (ECA) be carried out using the Natural Colour System (NCS)
Tree surveys	4.2.17	Without prejudice to the Council's position, in the absence of full and complete tree surveys being available prior to a decision being made, this section should be consistent with the CEMP (p16C-35) - 'As part of discharging Requirement 6 of the draft DCO updated tree surveys will be carried out for any areas where arboricultural impacts are likely and where no detailed survey information has been captured to date.'
Hedgerows	4.2.22	Move para to the section on hedgerows.
Lighting	4.2.43	The section is not clear about how lighting will be managed to avoid impacts on existing habitats within the Order limits during construction.
Hedgerows, objectives	5.4.3	Many hedgerows additionally have a landscape screening function.

Tree and woodland planting objectives	5.5.3	Most of the new woodlands and tree belts will have a visual screening objective which is not included.
Shading of panels by trees	5.5.4f	The solar panels should be located to avoid the potential for future shading, rather than the location of the panels constrain the extent of woodland planting.
Hibernacula in woodland	5.5.15f	Why is it necessary to wait until woodland is fully established, and after how many years is this considered to be?
Grassland habitat creation management plans	5.7.2	Grassland habitat creation management plans will be necessary for all the grassland types within the scheme and an outline of these should be included within the OLEMP taking into account the proposed habitat condition that is to be achieved and those habitats where it would not be practical to maintain through grazing (for example outside of the security fence).
Grassland objectives	5.7.4	Add retention and conservation of archaeology. Separate out Stone Curlew from the other lowland farmland birds.
Grassland design principles	5.7.5	These read as constraints rather than design principles
Use of chemicals	5.7.11	Is it reasonable to assume that all weed control across the whole site can be achieved through weed wipes or knapsack sprayers?
Soils skimming	5.7.12	Soil skimming raises concerns in relation to conservation of the archaeological resource (ECO3), impact of soil storage or spreading/mixing of material in other areas. All areas where soil skimming is being considered should be identified.
Stone curlew plots	5.8	Can the Offsetting Specification be appended to this document to avoid repetition and inconsistency between the two documents.
Existing PRow	Section 5.9.4 - 7	There is an existing PRow within ECO2 which is not described in this section.
Permissive paths	Section 5.9.11 -12	The new permissive paths will need to be maintained and monitored until decommissioning is complete. How often will grass paths be strimmed.
Ecological Advisory Group	Section 6.2.5	No information is given on how the Ecology Advisory Group will be funded or the mechanisms through which the applicant intends to secure this group.

		The Councils propose that the Ecology Advisory Group should be formally constituted pursuant to a s106 agreement or equivalent planning obligation and are drafting proposals to share with the applicant.
Landscape masterplan	Annex A	This has not been updated to reflect changes to the landscape proposals in the Environmental Masterplan.
Field management after establishment	Annex C	The Council has very recently been provided with a copy of the BNG Metric 3.1 spreadsheet and further time is required to review the spreadsheet and this table. It is not clear whether the 'management after establishment' refers to all the 'post development habitat types', as many of these will be outside the security fence and it is not clear how grazing would therefore be achieved.
Species diversity of planting palette	Annex D	The range of species in tables D1 – D3 should be expanded to ensure there is a diversity of species suitable for each of the main landscape character types.
Outline Historic Environmental Management Plan	Annex F	The OHEMP includes no information about the intended management of the APA's. As such it remains unclear whether the management of ECO1 and ECO2 both for archaeology and for stone curlew can be reconciled.
Monitoring	6.1.1 – 6.1.4	Whilst the commitment to quarterly landscape inspections for years 1-5 is welcomed, the Council's view on post construction monitoring is in the LIR [REP1-024] at 10.232 (landscape) and at 8.131-1.33 (biodiversity) including that the monitoring of habitats and species must be expanded to cover the entire operational period of the scheme and should be secured in the DCO (LIR 8.201).

6.7 Biodiversity Net Gain Rev 02 (tracked) [REP5-049]

Topic	Paragraph Number	Council's Comment
Arable flora		In the Applicant's response to LPA Deadline 4 Submissions [REP5-057] pg 17, the applicant claims that 'A comparison of notable arable flora habitats present at the time of survey (on the basis of the surveys that have been undertaken) and post-construction has been undertaken in a revised Biodiversity Net

		Gain report issued at Deadline 5'. This does not appear to be provided in the document. There is no explanation of how arable flora have been accounted for in the baseline neither is the created arable flora habitat identified in the Metric or on the plans. A full explanation should be provided.
Trees and woodland	3.7.9	It is not clear why the losses of woodland and trees identified in the AIA have not been included in the BNG calculation. The current calculation includes no losses of trees or woodland and the Council considers that this does not give a realistic prediction of the net gain of the project.
Mapping of habitats and planting		Given the size and complexity of the site, additional references should be used to identify the habitats shown on the plans and how they are taken into account in the Metric with notes included in the relevant column of the Metric 3.1. In general, it is difficult to distinguish between the different categories on the plans because of the similarity of the different shades of green. Linear habitats would be clearer if mapped separately.
Inconsistencies with the Environmental Masterplan		There are inconsistencies across the Environmental Management Plans and the Biodiversity Net Gain Plans (baseline and post development) for example: <ul style="list-style-type: none"> - Whether purple moorgrass and rush pasture west of E01 is existing or proposed. - ECO1 and ECO2 shown as lowland calcareous grassland (BNG) and other neutral grassland (Env Masterplan and table 4-2 and 4-4 of REP5-047). - Lowland dry acid grassland not shown in ECO3 on the Environmental masterplan.
Stone Curlew mitigation		Given the Applicant's clear position that the Stone Curlew population is part of the Breckland SPA population, the mitigation (10 x2ha plots and associated 5 x 16ha of grassland) should be identified in the Metric calculation so that it is clear this habitat does not contribute to the net gain.
Lowland dry acid grassland and other lowland acid grassland.	4.1.9 and 4.1.10	The report suggests that there are five fields in Sunnica East B which are examples of lowland dry acid grassland (priority habitat), however the plan shows only one area of this habitat. There appear to be more than two areas of other lowland acid grassland (para 4.1.10) shown on the plan – please clarify.
Strategic significance and Pine lines	3.6.1	It is not clear how pine lines have been taken into account and whether they have been given strategic significance.

Watercourse enhancements	4.4.6	No measures (planting of vegetation in the channel or the riparian zone) are included in the OLEMP relating to watercourse enhancements.
Distinctiveness	Table 4-7	The distinctiveness bands are not included in the table -the figures in the column are areas.
Monitoring	5.1.3	The section refers to the OLEMP in relation to monitoring. Monitoring of habitats in the OLEMP is for 10 years. This is not consistent with long term monitoring and reporting of BNG which the Council would expect for the at least the lifetime of the project.
Management to reach target condition	4.4.1	The OLEMP does not include management prescriptions for the majority of habitat, and no target conditions provided in that document. Based on the level of information provided in the OLEMP, the Councils view is that the scheme will result in the creation of poorer quality habitat than is predicted and BNG is not secured.
Metric 3.1 calculation sheet		All assumptions made in the calculations should be clearly identifiable. There are no notes included in the metric and the accompanying report does not provide sufficient clarification particularly in relating the assumptions made to the areas of habitat on the plans and the columns in the metric. For example, in the Assessors comments the relevant parcels should be listed.