

SUNNICA ENERGY FARM

EN010106

8.93 LVIA Position Statement

Planning Act 2008

Infrastructure Planning (Examination Procedure) Rules 2010



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LVIA Position Statement

A.1.1 Position on assessment LVIA methodology

- A.1.1.1 The methodology for the Landscape and Visual Impact Assessment (LVIA) has been developed with reference to industry standard published guidance. The approach is in accordance with the principles set out in the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition (GLVIA3) (Landscape Institute and Institute of Environmental Management and Assessment, 2013).
- A.1.1.2 The methodology LVIA summarised in Chapter 10 of the Environmental Statement [APP-042], is set out in detail in Appendix 10C [APP-102].
- A.1.1.3 Clarification in relation to specific points of the methodology was provided in the Technical Note 'Further clarification on LVIA methodology' submitted as Appendix L to the Applicant's Response to the First Written Questions at Deadline 2 [REP2-038].
- A.1.1.4 The Local Authorities raised some specific concerns with the methodology for the LVIA in their Joint Local Impact Report [REP1-024] at Deadline 1. The Applicant provided reasoned justifications and rebuttals for the points raised in Section 6 of the Applicant's Response to the Joint Local Impact Report at Deadline 3 [REP3-019]. This explained that the methodology was consulted upon and updated in response to the Scoping Opinion [APP-052] and presented in the Preliminary Environmental Information Report (PEIR). It was then further reviewed and updated in response to comments made by Local Authorities through meetings and consultation on the PEIR. The Applicant maintains that the methodology is fair, thorough and robust in its application within the LVIA in assessing the likely landscape and visual effects of the Scheme.
- A.1.1.5 The Written Summary of Applicant's Oral Submissions at ISH2 on 7 December 2022 [REP4-030] notes in section 5.1 that the Local Authorities' position regarding the methodology for the LVIA was agreeing to disagree with the Applicant, and that the Local Authorities are more inclined to move on and focus more on the conclusions regarding landscape impacts and their mitigation. The Applicant agrees that this would be the appropriate approach at this point in the Examination and is committed to working with the Local Authorities on the Scheme's mitigation proposals.

A.1.2 Position on mitigation - construction

- A.1.2.1 Paragraph 10.10.3 of Chapter 10 of the ES [APP-042] recognises that the construction phase of the Scheme will result in residual effects due to the changes in surface landform, landcover, presence of construction machinery and the associated activity which is required to implement the Scheme. The assessment is based on a worst-case scenario where construction would occur across the whole site at once, as set out in paragraph 10.8.147. In reality, this would not be the case and construction work is likely to be carried out in phases.
- A.1.2.2 As explained in paragraph 10.7.11 of Chapter 10 of the ES [APP-042], the embedded mitigation measures for the construction stage are set out in Appendix 16C: Framework CEMP, Appendix 16F: Framework Operational Environmental Management Plan and Appendix 16E: Framework Decommissioning Environmental Management Plan of this Environmental Statement. This includes measures such as construction exclusion zones in relation to retained vegetation, ensuring a tidy and neat working area, covering stockpiles, hoardings in a suitable colour to aid their integration in the landscape and storing topsoil in accordance with best practice measures.

- A.1.2.3 Public rights of way (PRoW) closures are discussed and outlined in the Framework Construction Traffic Management Plan and Travel Plan [APP-118] and in the Traffic Regulation Measures Plans – Temporary Road Closures plans [APP-009, APP-010, APP-011].
- A.1.2.4 The Applicant has considered further measures to avoid or mitigate the landscape and visual effects of construction in response to issues raised by Interested Parties during the Examination. This includes introducing temporary screening fencing along the eastern edge of E20 adjacent to a travellers' site. Further clarification on how the temporary possession of PRoW will be addressed during construction was given at ISH3, summarised in Section 7 of the Written Summary of Applicant's Oral Submissions [REP4-032].

A.1.3 Position on mitigation – operation

- A.1.3.1 Paragraph 10.7.1 of Chapter 10 of the ES [APP-042] explains that the LVIA has informed the iterative design process, via design principles which respond to the policy requirements, published landscape character assessments and field work analysis, in order to mitigate the likely adverse effects of the Scheme.
- A.1.3.2 The measures proposed to mitigate the effects of the Scheme on landscape and biodiversity features, and to enhance the biodiversity, landscape and green infrastructure value of the Order limits, to secure compliance with relevant national and local planning policies are set out in the Outline Landscape and Ecology Management Plan (OLEMP) [REP5-011].
- A.1.3.3 The vision and design principles for the landscape design were strongly influenced by the LVIA. They are set out in the OLEMP (final version to be submitted at Deadline 7) and the Design and Access Statement [APP-264]. Retained and proposed green infrastructure is shown on the Environmental Masterplan [REP5-054, REP5-06, REP5-062, REP5-063, REP5-064] (final version to be submitted at Deadline 7).
- A.1.3.4 The aim of the landscape design and mitigation, as set out in the Applicant's responses to Relevant Representations [REP1-016] WSC-21 at Deadline 1, and in response to LPA Deadline 4 submissions has been to retain the legibility of the landscape and to avoid (i.e. reduce to zero) or otherwise minimise adverse impacts on its character and views of the landscape. This has been achieved where possible by offsetting development from settlement boundaries, roads and public rights of way, retaining existing vegetation within and on the boundaries of the site and reinforcing green infrastructure through additional planting which reflects the character of the landscape. Further detail is provided in Appendix A of the Applicant's Response to the First Written Questions [REP2-038].
- A.1.3.5 The Applicant has continued discussions with the Local Authorities around the proposed mitigation, including through multi-disciplinary workshops during the Examination period held on 1 December 2022 and 31 January 2023. The Applicant has reviewed and amended aspects of the design of the Scheme following these workshops to provide additional mitigation in a number of locations, as illustrated on the Environmental Masterplans, and to provide further clarity and detail on the objectives and specification of the proposed mitigation for the Scheme as a whole in through the OLEMP. The result will be included in the updates to the OLEMP and Environmental Masterplans to be submitted at Deadline 7.

A.1.3.6 A summary of the additional mitigation that has been agreed to by the Applicant and included in the OLEMP and Environmental Masterplan at Deadline 5 (save where mentioned) is set out below.

a. Sunnica East Site A

- i. Extension of the permissive path to include a loop around E05, including introducing self-binding gravel surfacing to the main route between Isleham and Beck Road to improve access;
- ii. Realignment of the permissive route and additional scrub, tree and wetland habitats along Beck Road to further enhance amenity and to limit disturbance of stone curlew in ECO1;
- iii. Addition of a memorial and viewing place for the B50 crash site associated with the route of the permissive path;
- iv. Tree planting to the west side of Lee Brook, with ongoing discussions around providing more planting in this location on-going following the workshop with the Local Authorities on 31 January 2023.

b. Sunnica East Site B

- i. Additional hedgerow to the east side of E12 to screen views from U6006;
- ii. Realigned permissive routes to make use of existing tracks and limit disturbance of existing acid grassland;
- iii. Increased the width of planting along the edge of E18 to 25m provide additional enclosure and screening of the substation and BESS;
- iv. Increased width of planting to 15m along the western edge of E14 to E16 to further screen views from U6006. Further detail will be added to the OLEMP and Environmental Masterplan at Deadline 7 to reinforce existing vegetation along U6006 between E12 and E13.
- v. Increased the width of planting along the eastern edge of E20 to 15m to screen views from adjacent travellers site;

c. Sunnica West Site A

- i. An additional hedgerow is proposed along W10 adjacent to the Lee Brook
- ii. The belt of woodland proposed along Lee Brook has been broken up to create gaps, scrub and trees introduced along the edge and rush pasture within the grassland to increase habitat diversity.

A.1.4 Position on the removal of removal of parcels E05, E12, E13 and W01-W12

A.1.4.1 The LVIA summarised in Chapter 10 of the ES [APP-042] does not support the removal of parcels E05, E12, E13 and W01-W12 from the Scheme.

A.1.4.2 Parcel E05 lies within Sunnica East Site A. At the county scale this forms part of LT Rolling Estate Chalklands. The magnitude of impact is assessed as low at this scale in construction, operation and decommissioning and the effects are not significant. At the local scale it falls within LLCA11: East Fen Chalklands. Impacts are assessed as medium in all scenarios and effects in construction, year 1 of operation and decommissioning are assessed as moderate adverse which is significant. However, with proposed mitigation by year 15 of operation these effects are assessed as not significant.

A.1.4.3 Parcels E12 and E13 fall within the LT Estate Sandlands at the country scale. The effects at this scale are assessed as not significant in all scenarios. At the

local scale these parcels fall within LLCA 13: Estate Sandland Mosaic. Effects in all scenarios are assessed as significant, with effects reducing from major adverse in year 1 of operation to moderate adverse year 15 of operation. All parcels within Sunnica East Site B fall within this LLCA and removing parcels E12 and E13 would not change the overall conclusions of the assessment. Additional mitigation is being considered to further reduce the localised impacts on U6006 by strengthening the existing vegetation along this route. This will be set out in more detail in the OLEMP and Environmental Masterplan at Deadline 7.

- A.1.4.4 Parcels W1 to W12 comprise the western part of Sunnica West Site A. At the local scale the landscape falls within LLCA 24: Lowland Estate Chalkland. Effects in all scenarios are assessed as significant, with effects reducing from major adverse in year 1 of operation to moderate adverse in year 15 of operation and decommissioning. Sunnica West Site B has already been removed from this LLCA. In addition, further mitigation has been included in the northern part of the area, including hedgerows along the western side of W10 and further enhancements to the habitats along the Lee Brook. The assessment illustrates that, whilst there would be residual significant effects on the landscape, these would be localised and would in any event be arising to a landscape that is not designated. At the county scale this forms part of LT Rolling Estate Chalklands, along with large parts of Sunnica East Site A. The magnitude of impact is assessed as low at this scale in construction, operation and decommissioning and the effects are not significant.