# Cambridgeshire County Council (20031358) East Cambridgeshire District Council (20031149) Suffolk County Council (20031377) West Suffolk Council (20031311)

The Councils' position on 'parcel by parcel' mitigation and residual effects

# **Sunnica Energy Farm** (EN010106)

Deadline 7

3 March 2023

#### **Preamble:**

This document has been prepared jointly by the four host local authorities to avoid duplication of work, especially where technical expertise is shared between authorities. This submission is in response to Action Point 1 arising from Issue Specific Hearing 4 (ISH4) on Environmental Matters and the draft Development Consent Order (dDCO).

The Councils' primary position remains that this proposed development is unsuitable within the context of the historic landscape around Chippenham Park, and that the resulting effects are not capable of being sufficiently mitigated to be made acceptable. For this reason, the Councils have not previously submitted detailed request for further mitigation. The comments in the tables are given, without prejudice, for the case that the ExA is minded to approve these parcels.

The Councils have also expressed concerns in their earlier representations about the effects of the proposed development in the vicinity of Isleham (parcel E05) and in the vicinity of the unclassified road/recreational route U6006 (parcels E12 and E13). The Councils maintain their position that solar panels and other above ground infrastructure should be removed from these parcels but have also, in response to ExQ2.0.9, provided details (in REP5-084 submitted by SCC) of further mitigation were the ExA minded to recommend the retention of panels in these parcels.

The applicant should demonstrate for all parcels that the solar panels are set back far sufficiently from any existing vegetation, so that shading will not become an issue during the lifetime of the project resulting in the further reduction or loss of the existing vegetation. It should be secured in the DCO that reduction or loss of vegetation, including any mitigation planting, is not acceptable to resolve shading problems.

There remains a considerable mismatch between the information provided in the OLEMP, on the Environmental Masterplans, the tree surveys (as far as they have been carried out) and the hedgerow plan (provided on 8/02/23). These need to be fine-tuned and aligned by the Applicant. In REP6-075 SCC set out its comments on the OLEMP (REP5-011), including its detailed comments at paragraph 5.2.2, on a parcel by parcel basis, in relation to the further mitigation needed at Sunnica East A and Sunnica East B. Those comments are carried forward in Table 1 below.

There is a significant amount of existing woodland missing from the hedgerow map. It would be useful to have existing woodland included, in a paler shade, so that it can be ascertained what is classified by the Applicant as woodland and what as hedgerow, and then, whether the plans are providing the full picture.

Table 1: Sunnica East A

Ref.	Current proposals as detailed in OLEMP [REP5-014]	Residual effects	Further mitigation required [REP4-149] and LIR [REP1-024]	Applicants mitigation under discussion/or not yet shown on EnvM – [AS-324] and/or [AS-321]	Residual effects if the Council's mitigation is implemented in full
E05	landscape buffer of native grassland, to reduce the proximity of the panels to road users, retain views along the road corridor of the churches in Isleham and	-Planting of woodland is uncharacteristic in this open landscape -Views from Isleham including the Ark will be of vast expanse of solar panels initially -In the long-term long distant open views from Isleham and the Ark will be truncated by the woodland planting including to Freckenham Church(VP3)			-Full removal of E05 would remove the effects of the scheme west of Lee Brook, both those resulting from the development itself and those resulting from mitigation planting inappropriate for the landscape in this area.  -Residual effects are expected to include long-distance, filtered views of E01, E03 and E33 from VP1-VP5. Together with the further mitigation proposed by the Councils for these parcels, these views would reduce over time, as the vegetation matures, and what would remain would be views towards Lee Brook, identifiable in the landscape.  Partial removal of E05 (to an existing field boundary) would significantly reduce the adverse effects on views of the scheme from Isleham and the Ark and long-term truncation of views would be significantly reduced.  -E05 Retained -Planting of woodland is uncharacteristic in this open landscape -Views from Isleham including the Ark will be of vast expanse of solar panels initially-In the long-term long distant open views from Isleham and the Ark will be truncated by the woodland planting.  - Positive place making around the place crash site and a circular route for footpath users would result in some recreational benefits.

			signage to explain the history of the Plane Crash site  -To remove some solar panels along the assumed flight path, which would create a visual link from Beck Road/the permissive footpaths across the Plane Crash site towards Mildenhall where the plane took off  -Allow access to the Plane Crash site area -Provide seating  -Work with the community of Isleham to commission a commemorative sculpture		
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.	-Informal footpath to the north along the dismantled railway line will cause disturbance to Stone Curlew	-Consider landscape hedge along western half of the northern boundary (currently no planting) to reduce disturbance of offsetting land by recreational users on the dismantled railway line.	-Applicant to review proposals for this area, to resolve in-combination effects between archaeology and ecology.	-Disturbance to Stone Curlew will remain in the short term, but as the hedge matures disturbance would be reduced over time, increasing the chances of successful Stone Curlew nesting.
ECO2	– Native chalk grassland and stone curlew plots, will retain the open character of the land between Isleham and Freckenham, to the west of Beck Road;	- Existing PRoW from Mortimers Lane within the eastern boundary of ECO2 will cause disturbance to Stone Curlew	-Provide a hedgerow between ECO2 and the existing PRoW to define the route and replicate Mortimers Lane. A barrier to the public will be created by the permanent predator fence	-	-Disturbance to Stone Curlew will remain in the short term, but as the hedge matures disturbance would be reduced over time, increasing the chances of successful Stone Curlew nesting.
E01	- Panels are offset from the Fen woodland to the north and by 8m from the Lee Brook to the westNew willow trees planting along the Lee Brook edge of E01 to provide additional riparian planting;	- Small number of willow trees provided would not achieve the level of screening of the panels and BESS and other solar infrastructure required from the west (views from Isleham/Beck Road, and River Lark - It is not clear whether the rush pasture is retained or proposed	- Clarification is required on the width of	Applicant has committed to -Review screening along the west of the parcel to provide better screening of E33 -Avoid any conflict with priority habitats where present	-Initial views of BESS from the River Lark but these would reduce as vegetation matures reducing the effects to an acceptable levelLee Brook would become more legible in the landscape, as the vegetation matures.
E02	<ul> <li>New broadleaved woodland planting along the eastern edge of the parcel,</li> <li>EnvM also shows mixed scrub to the west and south along the ditch</li> </ul>	-	-Clarification is required on the width of the buffer /setback form Woodland north of E01 and E02	-	-
E03	– New broadleaved woodland to the north and south of the parcel, to screen views from the wider landscape to the north and from Lee Farm.	-Legibility of Lee Brook in the landscape is lost -Views of BESS from the R Lark to the west (VP1) initially and in the long term	-Provide additional riparian planting including trees that would also provide screening/ softening of the scheme including the BESS and make Lee Brook more legible in the landscape (views from Isleham and Beck Road) -Increase the distance/ buffer between Lee Brook and western boundary of E03 to at least 30m to accommodate that planting.	-Review screening along E03 which would provide better screening of E33, ensuring any proposed planting does not conflict with the priority habitat (if any) along river.	-Initial views of BESS from the River Lark but would reduce as vegetation matures reducing the effects to an acceptable levelLee Brook would become more legible in the landscape, as the vegetation matures.

E04	-Additional broadleaved woodland along the northern, southern and the eastern edges	-Potential for truncation of long- distance views of the Ark and St Andrews Church in Isleham.	-Consider if, views from the residential properties on Ferry Lane to The Ark and St Andrew's Church in Isleham could be retained (see VP2C), with appropriate adaption of the proposed mitigation planting and siting of structures within E04.	-	-
E33	-Siting the primary construction compound, BESS and substation in E33 adjacent to reservoirs and Lee Farm, so that their massing and land uses are perceived in the context of existing infrastructure features and built structures in the landscapeThe tonal rendering of shades to integrate the permanent structures within the landscape will help to reduce their perceived overall mass.	-BESS and substation will remain visible in the landscape from the the edge of Isleham (VP3), River Lark (VP 01, 2A and 2B), Ferry Lane (VP2C) and the wider landscape to the south VP12A -Colour of external finishes for structures to be green, light grey or white	- Plant a tree belt/woodland along the western side of E33 (Bess and substations). (see VP1, VP6, VP7) -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) -Or adjust the position of the infrastructure here to allow sufficient space for effective mitigation (LIR 10.170) -Environmental colour Assessment to be undertaken at detailed design stage to inform the external finishes of the stuctures		-The BESS and other solar infrastructure would remain visible and incongruent in the landscape initially including from the R Lark, Isleham, Ferry Lane and the wider landscape to the south, although the effects would be tempered by the tonal rendering of shades of structures.  -As the vegetation matures the effects would reduce particularly in the summertime although the planting would be uncharacteristic in the open flat landscape.
E08, E09 and E10	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	-BESS and substation will remain visible in the landscape from VP12A, VP12B and wider landscape to the south.	-Photomontage suggests wider set back than Landscape Masterplan. (see VP12A) - Woodland north of E08 needs to be wider as views are far reaching towards BESSFor E09 and E10 consider how the second hedge can be adapted to strengthen and enhance the existing hedge on the southern boundary	- A second hedgerow is currently proposed along the southern edge of E09 and E10. Applicant to consider options for enhancing/increasing height of the existing hedgerow in this location	-Initially the BESS and substation will remain visible in the landscape from VP12A, VP12B and wider landscape to the southAs the vegetation matures the effects would reduce particularly in the summertime although the planting would be uncharacteristic in the open flat landscape.

# Table 2: Sunnica East B

Ref.	Current proposals as detailed in OLEMP [REP5-014]	Residual effects	Further mitigation required [REP4-149] and LIR [REP1-024]	Applicants mitigation under discussion/or not yet shown on EnvM – [AS-324] and/or [AS-321]	Residual effects if the Council's mitigation is implemented in full
ECO3	-ECO3 will establish a substantial offset from Freckenham Road, U6006 and County Wildlife Site will be retained and is proposed for native chalk grassland -Retain existing hedges and pine line	_	_	-	_
E12	-New proposed hedgerow along northern and eastern edge of E12 to join existing hedgerow to act as screening for PRoW users [Environmental Masterplans (60589004_ES_LSP_8.1-3, Rev 1, Sheet 3 of 5, Sunnica East Site B)];  (Eastern hedgerow is not shown on the hedgerow plan.)	-Unacceptable visual impact from the U6006 - Unacceptable loss of woodland TPO trees which form a pine line along the southern boundary of E12 with the U6006 (G81 on AIA) -Visual impact on open landscape when viewed from Worlington and from properties on Freckenham Road - irreconcilable conflict between the requirements of landscape planting for amenity (screening) and the requirements for ecology, to be realised in ECO3	E12 should be omitted from the scheme. An alternative (halfway house was additionally proposed further to ExQ2 [REP5-084]  If these options are not possible: -Provide an appropriate set back from U6006 and additional screen planting along the boundary of E12 parallel to the U6006 -Provide screen planting along the southern and south-western boundary-hedge and pines. (see VP15A) -There should only be one crossing point across U6006, where vegetation loss is minimal -The existing hedgerow within E12, shown on the hedgerow plan should be retained	-Consider adding planting within areas of existing vegetation (U6006) and adding a secondary hedge between E12 and E13 to provide additional screening.	-Loss of TPO trees could be minimised
E13	<ul><li>Solar panels have been offset from the intervening pine lines</li><li>Panels have also been offset from U6006</li></ul>	- Unacceptable loss of TPO woodland along the north-western boundary of E13 with the U6006 (G82 on AIA)	E13 should be omitted from the scheme for ecological reasons.	-Consider adding planting within areas of existing vegetation and adding a	Removal of E13 -Loss of TPO trees would be minimised through directional drilling of cable

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	-Woodland planting to the northeast boundary	- Visual impact from the U6006	If this is not possible and being sensitive to the existing landscape structureRetain curves in U Road between E13 and E14Retain all existing vegetation through use of direct drilling -Provide additional hedge along and adjacent to U-Road corridor to strengthen the existing woodland plantingProvide hedge planting along south-western boundary (along northern side of existing track). (see VP15B) – outside the RPA of the veteran trees (T216 and T218) -Remove panels from the existing area of acid grassland.	secondary hedge between E12 and E13 to provide additional screening.	although this would depend on whether access to E12 was requiredEcological benefits in relation to acid grassland, invertebrates and stone curlew  E13 retained - Unacceptable loss of TPO woodland along the north-western boundary of E13 with the U6006 (G82 on AIA) - The panels in E13 would remain visible initially but effects would reduce to an acceptable level as vegetation matures -Ecological benefits in relation to acid grassland, invertebrates
E14	- Solar panels have been offset from the intervening pine lines -Panels have also been offset from U6006 -Increased width of planting to 15m along the western edge of E14 to E16 to further screen views from U6006 [AS-321]	- Views to the BESS from the U6006 would remain particularly in winter -Views of panels from the U6006 within E14 initially and then in winter would remain including through access points -Truncation of views to the east from the U6006 particularly in summer -Views of the BESS from the wider countryside would remain	Being sensitive to the existing landscape structureStrengthen the boundaries between this parcel, E13 and E15 by planting additional pinesAlong eastern boundary repair and strengthen the pine linesProvide better screening in northern corner of E14 by planting up a triangular corner of sufficient sizeReinforce pine lines/tree belts along the western eastern boundaries		-BESS and substation and panels in E14 would remain visible initially but effects would reduce to an acceptable level as vegetation matures aided by the strengthening of treelines -Truncation of views to the east from the U6006 particularly in summer
E15	- solar panels have been offset from the intervening pine lines -panels have also been offset from U6006 -Increased width of planting to 15m along the western edge of E14 to E16 to further screen views from U6006 [AS-321]	- views to the BESS from the U6006 would remain particularly in winter -views of panels from the U6006 within E15 initially and then in winter would remain including through access points -truncation of views to the east from the U6006 particularly in summer -views of the BESS from the wider countryside would remain	Being sensitive to the existing landscape structurestrengthen the boundary between this parcel, E14 and E16 by planting additional pinesAlong eastern boundary repair and strengthen the pine linesreinforce pine lines/tree belts along the western boundary - Create visual corridor north of the tree belt on the southern boundary by using the existing track for access and screening the solar panels by planting up a sufficiently large triangular area in the southwestern corner of E15		-BESS and substation and panels in E15 would remain visible initially but effects would reduce to an acceptable level as vegetation matures aided by the strengthening of treelines -Truncation of views to the east from the U6006 particularly in summer but there would be some relief to this at the visual corridor along the treeline

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E16	- solar panels have been offset from the intervening pine lines -panels have also been offset from U6006 -Increased width of planting to 15m along the western edge of E14 to E16 to further screen views from U6006 [AS-321]	remain particularly in winter	Being sensitive to the existing landscape structurereinforce pine lines/tree belts along the southern edge (see VP15B VP21, VP21A)strengthen the boundary between this parcel and E15 by planting additional pinesAlong eastern boundary repair and strengthen the pine linereinforce pine lines/tree belts along the western boundary.		-BESS and substation and panels in E16 would remain visible initially but effects would reduce to an acceptable level as vegetation matures aided by the strengthening of treelines -truncation of views to the east from the U6006 particularly in summer
E17	-proposed tree belt to the east (shown on EnvM)	-open views of BESS and substation at E18 particularly relevant if offsite woodland is removed or thinned in the future.	Being sensitive to the existing landscape structure repair and strengthen the pine line on north-western boundary -provide tree belt along southern boundary of E17 with E18 to improve screening of BESS.	-	-BESS and substation would remain visible initially but effects would reduce as vegetation matures
E18	Siting the BESS and substation in E18 so that it is enclosed and screened by existing woodland along its northern edges and in part by roadside vegetation adjacent to Elms Road to its south-east.  -Increased width of planting along the edge of E18 to 25m  -The tonal rendering of shades which are suitable to integrate within the landscape will help reduce the perceived overall mass of these structures.  -land uses and proposed structures are consolidated in proximity to Worlington Quarry and Bay Farm solar farm	-unclear whether and how much of the	-Provide tree belt along southern boundary of E17 towards BESS in E18. (see VP16) -strengthen tree belts within parcels 14-17 to provide layers of landscape screening -re-instate any hedgerows removed behind the visibility splaysEnvironmental colour Assessment to be undertaken at detailed design stage to inform the external finishes of the structures		-The BESS and other solar infrastructure would remain visible and incongruent in the landscape initially including from the U6006 and the wider landscape to the north and west and from Elms Road, although the effects would be tempered by the tonal rendering of shades of structures.  -As the vegetation matures the effects would reduce particularly in the summertime. The layers of screening provided by the strengthening of existing tree lines as well as new planting would provide an effective framework for the proposed development.  -Woodland planting on both sides of Elms Road significantly changes character  -Unclear whether and how much of the existing hedgerow will need to be removed to facilitate the access to the BESS
E19	– The solar panels have been located to reflect the landscape pattern and retain the intervening pine lines.	-Panels visible from the existing PRoW to the south of E19 and close to the reservoir	-plant a tree belt to reinforce the planting along Elms Road -Water reservoir: Plant up the triangular area on the	-review screening around reservoir between E22 and E19 and consider hedgerow	-Initially the panels would remain visible from the existing PRoW to the south of E22, particularly through gaps and close to the reservoir however this would

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	-New woodland proposed on the northwest and southwest around perimeter of the parcel to reduce the visibility from the PRoW, as well as screen the structures and reduce the perception of the Scheme from Badlingham;	-Panels prominent from the permissive path on the northwest boundary of E19 -Woodland planting on both sides of Elms Road significantly changes character	south-western side of the reservoir within parcel E19 (Locations for tree groups?) -Strengthen internal treelines between E19, E20 and E21 (see VP 20)careful design of permissive path required to retain privacy of adjacent landowner	planting in corners adjacent to the reservoir	reduce to an acceptable level as vegetation matures.  -The panels would be prominent form the permissive path on the northwest boundary of E19 but as the vegetation matures the amenity of the footpath would improve particularly if it were located within the woodland belt.  -Woodland planting on both sides of Elms Road significantly changes character
E20	-The solar panels have been located to reflect the landscape pattern and retain the intervening pine linesNew woodland is proposed around the eastern and north-eastern perimeter of the parcel to reduce the visibility from residents adjacent to Bridge End Road.	-Multiple barriers between the traveller's site and the scheme unlikely to give cohesive approach -Proposed additional planting welcomed but unlikely to screen the proposals effectively -Woodland planting on both sides of Elms Road significantly changes character -Loss of view for the neighbouring residents -Woodland planting on both sides of Elms Road significantly changes character	-Strengthen internal treelines between E20, E19 and E21 (see VP 20)On the eastern side of the parcel increase buffer between fence and solar panels to 30m and provide tree belt with hedgerows on either side for visual amenity purposes.	-Applicant proposes to increase the width of planting along the eastern edge of E20 to 15m to screen views from residents adjacent to Bridge End Road (not yet shown on EnvM)	-Initially the panels would remain visible to the residents on the traveller's site however this would reduce to an acceptable level as vegetation matures Loss of view for the neighbouring residents would remain -Woodland planting on both sides of Elms Road significantly changes character
E21	-The solar panels have been located to reflect the landscape pattern and retain the intervening pine linesNew woodland is proposed on the south-eastern boundary to reduce the visibility from residents adjacent to Bridge End Road.	-Infrastructure visible from businesses on Bridge End Road	-Strengthen internal treelines between E20, E19 E21 and E22 (see VP 20). -Extend the 30m enhanced planting requested on the eastern side of E20	-	-Initially the panels would remain visible from businesses on Bridge End Road but would reduce to an acceptable level as the vegetation matures
E22	-The solar panels have been located to reflect the landscape pattern and retain the intervening pine linesNew woodland is proposed around the eastern and southwestern boundary of the parcel to reduce the visibility from businesses adjacent to Bridge End Road and local PRoW.	-Panels visible from the existing PRoW to the south of E22, particularly through gaps and close to the reservoir -Infrastructure visible from businesses on Bridge End Road	-Water reservoir: Plant up the triangular area on the south-eastern side of the reservoir within parcel E22 extending along the boundary with the reservoir as necessary. (Locations for tree groups?) -Strengthen internal treelines between E22, E21Extend the 30m enhanced planting requested on the eastern side of E20 and E21	-Review screening around reservoir between E22 and E19 and consider hedgerow planting in corners adjacent to the reservoir	-Initially the panels would remain visible from the existing PRoW to the south of E22, particularly through gaps and close to the reservoir however this would reduce to an acceptable level as vegetation maturesEffects would also reduce to an acceptable level in relation to Bridge end road as the vegetation matures
E24	– New woodland planting is proposed to the north, and east of the parcel to	-Long distance views from U6006 across landscape to panels would remain	-Provide appropriate screen planting along western	-Applicant has stated that they have reviewed this suggested change, there is	-Initially long-distance views from U6006 across landscape to panels would remain

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	screen the structures and reduce the perception of the scheme when travelling along Worlington Road;	-potential visual effects around the access from Worlington Road into the parcels would remain -unacceptable loss of TPO trees for cable crossing of U6006 north of E24	boundary of the parcel, incl. hedges and pines to screen these parcels to views from the U6006Identify access points on Environmental Masterplan.	an existing bund and vegetation, but no further planting can be accommodated due to space constraints.	however these would reduce to an acceptable level as vegetation matures
E25	-New woodland planting is proposed to the east and south of the parcel to screen the structures and reduce the perception of the scheme when travelling along Worlington Road;	-Long distance views from U6006 across landscape to panels would remain -Potential visual effects around the entrance from Worlington Road into the parcels would remain	-Provide appropriate screen planting along western boundary of these parcels, incl. hedges and pines to screen these parcels to views from the U6006Identify access points on Environmental Masterplan.	-Applicant has stated that they have reviewed this suggested change, there is an existing bund and vegetation, but no further planting can be accommodated due to space constraints.	- Initially long-distance views from U6006 across landscape to panels would remain however these would reduce to an acceptable level as vegetation matures
E26-E27	-Panels are offset from the boundary vegetation.	-Views across the rear of the panels from permitted path to the north will remain	-Consider a hedgerow to soften the impact of the panels when viewed from the path	-Path running along northern edge of E26 and E27, considering the addition of a hedgerow.	-Panels would be visible initially but as vegetation matures it would provide screening
E28-E29	-Panels offset from the boundary vegetation.	-views of solar infrastructure in winter through porous tree screen/woodland	- Additional hedge should be included between the DCO limits and the track along the south of E28 and E29.	-	-
E30	- The woodland in the south-east part of the Site has been retainedAdditional hedgerow and woodland planting are proposed adjacent to Golf Links Road (30m) -Woodland to the north of the parcel and east of the existing access to be retained and planting in gaps in vegetation on northern edge	-Views of vast expanse of solar panels for motorists on Golf links road (VP24) through existing gaps and entrances initially -Perception of the Scheme in relation to Worlington.	-Additional hedges along the western boundary of E30. -Remove security fence from the retained woodland -Strengthen hedge between E30 and E31 as required.	-	-Initially vast extent of panels across E30 would persist however this would reduce as vegetation matures (VP24)
E31	<ul> <li>The woodland in the southern part of the Site has been retained.</li> <li>Additional hedgerow and woodland planting are proposed adjacent to Golf Links Road (30m) to screen views for motorists and from views from the wider landscape to the north.</li> </ul>	-Views of solar panels for motorists on Golf links road (VP25) through existing gaps and entrances initially -Views of vast expanse of solar panels from the wider landscape to the north.	-Provide hedge between E31 and E32Provide internal hedge within E31 to break up expanse of solar panels.	-	-Initially vast extent of panels across E31 and E32 would persist however this would reduce as vegetation matures (VP25 and VP26A)
E32	<ul> <li>The woodland in the south-east part of the Site has been retained.</li> <li>Additional hedgerow and woodland planting are proposed adjacent to a short section of Golf Links Road (30m)</li> </ul>	-Unknown impact on vegetation to form access I off the A11 -Unacceptable views of vast expanse of solar panels for motorists on the corner of Golf Links Road on the home stretch to WorlingtonViews from the wider landscape to the north, persisting into the long-term.	-Plant up entire north-eastern corner (outside developable area) of E32 with woodland including oaks (see VP26A) avoiding archaeological constraints and access visibility splays to screen views of the panels and provide a positive focus on this cornerProvide more robust planting along the south-eastern edge of E32 and provide screening of solar panels at access.	-Review screening in this location and move proposed planting away from the barrowApplicant to provide further detail on design and transport constraints on screening at this location.	-Unknown impact on vegetation to form access I off A11 -Initial views of vast expanse of solar panels would reduce as vegetation matures -Views from the wider landscape to the north would reduce as vegetation matures.

# Table 3: Sunnica West A

Ref.	Current proposals as detailed in OLEMP [REP5-014]	Residual effects	Further mitigation required [REP4-149] and LIR [REP1-024]	Mitigation under discussion/ or not yet shown on EnvM – [AS-324] and/or [AS-321]	Residual effects, if Councils' mitigation is implemented in full
W01	No longer proposed.	Effects from the construction of the cable route. Not fully assessed on their own.	Proposals for post-construction landscape and ecology restoration required.	This has not yet been discussed with the applicant and no proposals have been submitted.	Currently unclear.  If no vegetation is lost and land restored after construction, landscape and visual effects are expected to be short term only.
W02	No longer proposed.	Effects from the construction of the cable route. Not fully assessed on their own.	Proposals for post-construction landscape and ecology restoration required.	This has not yet been discussed with the applicant and no proposals have been submitted.	Currently unclear.  If no vegetation is lost and land restored after construction, landscape and visual effects are expected to be short term only.
ECO4	No longer proposed.	Effects from the construction of the cable route. Not fully assessed on their own.	Proposals for post-construction landscape and ecology restoration required.	This has not yet been discussed with the applicant and no proposals have been submitted.	Currently unclear.  If no vegetation is lost and land restored after construction, landscape and visual effects are expected to be short term only.
W03	Siting the solar panels between woodland blocks and Foxburrow Plantation and reinforcing the vegetation patterns with new woodland planting to aid in screening this part of the Scheme from the wider landscape and retaining a physical separation from Chippenham Road and Snailwell.	The proposed woodland block on the north-western edge of W03 would block the long-distance views across the undulating landscape to the south-east from Bridleway 204/5 (VP41).  Loss of TPO trees: Although it has now been proposed to retain the TPO trees at the existing Field entrance north-west of W03, the crown lifting will have a negative impact on the avenue's appearance. There is further a risk that the trees either side of the access will be damaged through vehicle overrun and soil compaction.	Without prejudice, the DCO limits need to be moved further south-east, so that panels and mitigative planting would be situated in such a way that the views would be retained long-term. (See VP41).  The use of the existing field track should be omitted from the scheme and an access created within the cable corridor to minimise the adverse effects on the avenue on Chippenham Road. Unless the cable is installed by directional drilling that would then avoid the loss of the 2 or 3 TPO trees which would be a preferable solution.	This has not yet been discussed with the applicant.  This has been discussed with the applicant, but insufficient progress was made. The suggestion of using horizontal drilling has been made to the applicant but no response has been forth coming or confirmation as to how many TPO trees will be lost.	The residual visual impacts on the Prow 204/5 (VP41) would be significantly reduced, beginning from construction, as the works in W03 would be screened by landform.  The young avenue on Chippenham Road would remain visually coherent and largely intact.  In the medium to long-term it is expected that there would be no residual visual effects form this location, as the long-distance view would be retained and the solar panels would be screened by a hedge.

		It is expected that three trees would need to be removed at the north-eastern end of the avenue to enable the cable route (AIA) (hedgerow plan says two trees to be removed).  Loss of trees from south-eastern corner of W03 (W256, AIA).			However, detrimental residual effects on the historic landscape and the setting of the Chippenham Registered Park and Garden remain.  Trees would still be lost from southwestern corner of W03 (W256, AIA).
ECO5	Hedgerow proposed along south-eastern edge on Environmental Plan, in addition to existing retained hedge.		Retained hedgerows north-west and south-east of ECO5 should be included on the Hedgerow plans.	Hedgerow Plans are under review.	
W04	New native chalk grassland across part of the parcel, in response to below ground archaeology.  The solar panels have also been sited away from The Avenue so that new woodland can be implemented.  A temporary fence, rendered in a colour to aid its integration in the landscape will also be implemented in relation to views from Godolphin Gallops, until the establishment of the proposed planting, secured via the OLEMP.	The placement of solar panels within the setting of, and in close proximity to, the Registered Park and Garden, eliminates the currently existing time-depth of this area and detrimentally undermines the legibility of The Avenue in the landscape.  Although The Avenue to Chippenham Estate is in many parts densely vegetated, there are gaps that allow views out of the corridor, especially to the west towards parcel W04.	Without prejudice, as for W10 the extent of the solar panels should be located to ensure a physical separation from the boundary wall of Chippenham Park and Chippenham Hall. Therefore, the off-set of the solar panels from the outer edge of The Avenue should be the same distance as W10 is set back from Chippenham Park  The gaps in Avenue should be closed with appropriate planting suitable to the landscape character.	This has not been discussed in detail with the applicant as the Councils' primary position remains that this development is unsuitable for the historic landscape, and the resulting effects are not capable of being sufficiently mitigated to be made acceptable.	Even with the set-back the residual changes to the character of the historic landscape and views to and from The Avenue are substantial and result in detrimental effects, including the elimination of the experience of time-depth within the setting of the RPG. This is compounded by the fact that mitigation planting in form of hedging would be inappropriate in this landscape, as the hedge would run diagonal to the existing and historic field pattern.
W05	Siting the solar panels away from The Avenue so that new woodland can be implemented along the southern edges of the parcel, which is considered appropriate in the context of the Avenue and Chippenham Park.  There would also be a new woodland mix along the southern edge of the parcel which would include a higher percentage of evergreen species and a temporary fence, rendered in a suitable colour, to screen views from motorists on the A14, secured via the OLEMP.	The proposals for this parcel are unclear.  The placement of solar panels within the setting of, and in close proximity to, the Registered Park and Garden, eliminates the currently existing time-depth of this area and detrimentally undermines the legibility of The Avenue in the landscape.  The inclusion of a clump of conifers changes the species composition and the character of The Avenue (RPG).	Without prejudice, as for W10 the extent of the solar panels should be located to ensure a physical separation from the boundary wall of Chippenham Park and Chippenham Hall. Therefore, the off-set of the solar panels from the outer edge of The Avenue should be the same distance as W10 is set back from Chippenham -Any gaps in Avenue should be closed with appropriate planting suitable to the landscape character.	This has not been discussed in detail with the applicant as the Councils' primary position remains that this development is unsuitable for the historic landscape, and the resulting effects are not capable of being sufficiently mitigated to be made acceptable.	Even with the set-back the residual changes to the character of the historic landscape and views to and from The Avenue are substantial and result in detrimental effects, including the elimination of the experience of timedepth within the setting of the RPG. This is compounded by the fact that mitigation planting in form of hedging would be inappropriate in this landscape, as the hedge would run diagonal to the existing and historic field pattern.

W06	New woodland planting to the west of the parcel, to reduce their visibility in longer distance views from The Limekilns, as well as provide new vegetation links across the landscape.  The existing woodland between these parcels has also been retained, with panels and associated infrastructure offset from the woodland.	The proposals are unclear, as the parcel boundaries run north-west and south-west.  On the south-western boundary The Environmental Plan (sheet 13) shows 'planting to reinforce the existing hedgerow between parcels W05 and W07', which appears to continue between W05 and W06. This is welcome.	Without prejudice, as for W10 the extent of the solar panels should be located to ensure a physical separation from the boundary wall of Chippenham Park and Chippenham Hall. Therefore, the off-set of the solar panels from the outer edge of The Avenue should be the same distance as W10 is set back from Chippenham Park.  The hedge along the north-western boundary of W06 (H15) is the only one that has been identified by the applicant to be an important hedgerow under the Hedgerow Regulations 1997 [APP-079, Appendix 8C - Terrestrial Habitats and Flora Report, 5.3.1. and Fig 3.2]. It contains several mature beech trees.  Where W06 extends to the hedge, the off-set from this hedge should be no less than 10m form the outer rim of the canopy of the mature hedgerow trees to preserve the RPAs and improve the likelihood of its successful establishment.  However, potential shading of solar panels by the existing and proposed trees should be allowed for, which may require a far greater set back, to account also for future growth of these trees. This should be properly calculated.  Off-sets should be calculated in all areas to allow for future growth and to avoid shading issues.	This has not been discussed in detail with the applicant as the Councils' primary position remains that this development is unsuitable for the historic landscape, and the resulting effects are not capable of being sufficiently mitigated to be made acceptable.	A long-term increase in residual effects on existing (and proposed) trees can be avoided, if the siting of panels takes account of accurate shading predictions.  Even with the set-back the residual changes to the character of the historic landscape and views to and from The Avenue are substantial and result in detrimental effects, including the elimination of the experience of time-depth within the setting of the RPG. This is compounded by the fact that mitigation planting in form of hedging would be inappropriate in this landscape, as the hedge would run diagonal to the existing and historic field pattern.
W07	New woodland planting to the west of the parcels, to reduce their visibility in longer distance views from The Limekilns, as well as provide new vegetation links across the landscape.	The proposals are unclear, as the parcel boundaries run north-west and southwest.  On the south-western boundary The Environmental Plan (sheet 13) shows	Without prejudice, the proposals should be amended to enable the full retention of the existing woodland within W07. The internal access road would need to be slightly re-routed.	This has been discussed with the applicant, but insufficient progress was made.	The residual effects would be reduced as the woodland landscape feature would be retained in full.  However, detrimental residual effects on the historic landscape and the setting of

	The existing woodland between these parcels has also been retained, with panels and associated infrastructure offset from the woodland.	'planting to reinforce the existing hedgerow between parcels W05 and W07', which appears to continue between W05 and W06. This is welcome.  However, the Arboricultural Impact Assessment shows a partial removal of the existing woodland located within W07 (this removal is not shown on the Environmental Plan).	Off-sets should be calculated in all areas to allow for future growth and to avoid shading issues.		the Chippenham Registered Park and Garden remain.
W08	Limiting the extent of the solar panels across these fields, so as to respond positively to below ground archaeology.  New native grassland would extend across the archaeological areas, to create a continuous sward of grassland with that which will be present under the panels	This does not address the adverse landscape impacts on the historic landscape.  It may be difficult to establish a continuous sward.  Tree loss: Likely in eastern corner of the parcel. Trees have not yet been fully assessed.	Without prejudice, if this parcel is consented to be developed, its northwestern boundary should be brought in line with the boundaries of W06 and W10 to maintain the openness of the watercourse corridor and the riparian landscape.  The Environmental Masterplan (Sheet 4 of 5) appears to indicate Hedgerow planting along the north-eastern and north-western sides of W08; this should be included in the OLEMP and on the Hedgerow Plan (page 6). If W08 is consented in its entirety, then a hedge should also be provided along the southwestern boundary, opposite the CWS.	This has not been discussed in detail with the applicant as the Councils' primary position remains that this development is unsuitable for the historic landscape, and the resulting effects are not capable of being sufficiently mitigated to be made acceptable.	If W08 was reduced to finish at along the same boundary line as W06, the corridor of the watercourse would be more consistent and uninterrupted.  Potential shading problems would be avoided (existing poplars on western side of W08).  If W08 was not reduced in size, an additional hedge on the western side would help to embed the parcel into the landscape by additional screening.  However, detrimental residual effects on the historic landscape and the setting of the Chippenham Registered Park and Garden remain.
W09	Limiting the extent of the solar panels across these fields, so as to respond positively to below ground archaeology.  New native grassland would extend across the archaeological areas, to create a continuous sward of grassland with that which will be present under the panels	This does not address the adverse landscape impacts on the historic landscape.  It may be difficult to establish a continuous sward under the solar panels.  There is concern that there would be residual visual effects from the A11. (While visual receptors on major roads are usually considered to be of low sensitivity, it should be taken into account that there would be residual visual effects resulting from Sunnica in	Without prejudice, the proposals for mitigative planting along the A11 corridor are insufficient. While there is existing planting, this includes gaps that should be closed, and the roadside planting should in general be strengthened.  Hedgerow planting is indicated on the Environmental Plan (sheet 12) along the southern boundary on W09 and on the Hedgerow Plan (sheet 6). This should be included in the measures set out in the OLEMP.	This has not been discussed in detail with the applicant as the Councils' primary position remains that this development is unsuitable for the historic landscape, and the resulting effects are not capable of being sufficiently mitigated to be made acceptable.	Residual visual effects from the A11 would be reduced to close to zero over the medium to long-term.  However, detrimental residual effects on the historic landscape and the setting of the Chippenham Registered Park and Garden remain.

		many locations in the wider area, so that mitigation of visual effects should be provided, wherever possible and appropriate.)			
W10	The extent of the solar panels has been located to ensure a physical separation from the boundary wall of Chippenham Park and Chippenham Hall.  New hedgerow and woodland are proposed along the northern edge of these parcels to provide visual screening from La Hogue Road.  New woodland, hedgerow, mixed scrub and rush pasture is also proposed along the northern edge of W10, to provide visual screening from the same road and reinforce the existing vegetation patterns.	The proposed planting along La Hogue Road is not appropriate within the historic landscape and creates in itself an adverse visual effect.  Should W10 be retained, the hedge proposed in the OLEMP and shown on the Environmental Masterplan (sheets 10 and 12) along the north-western boundary of W10 would be acceptable.  The character of the landscape would be significantly and with regards to visual receptors, rapidly and permanently changed.	Without prejudice, a boundary hedge on north-western edge of W10 and tree belt along northern boundary of W10 (instead of tree belt along La Hogue Road) should be considered.  The additional planting along the water course should allow glimpses through (more akin to existing).  Should W10 be retained, the hedge proposed in the OLEMP and shown on the Environmental Masterplan (sheets 10 and 12) along the north-western boundary of W10 should be included in the Hedgerow Plans.  The retained hedge between W10 and W11 should be strengthened as required.	This has been discussed with the Applicant, some progress has been made, but further review is required to W10 be retained.  The Councils' primary position remains that this development is unsuitable for the historic landscape, and the resulting effects are not capable of being sufficiently mitigated to be made acceptable.	The adverse effect resulting from inappropriate visual mitigation planting would be reduced.  However, detrimental residual effects on the historic landscape and the setting of the Chippenham Registered Park and Garden remain.
W11	The extent of the solar panels has been located to ensure a physical separation from the boundary wall of Chippenham Park and Chippenham Hall.  New hedgerow and woodland are proposed along the northern edge of these parcels to provide visual screening from La Hogue Road.  New woodland, hedgerow, mixed scrub and rush pasture is also proposed along the northern edge of W10, to provide visual screening from the same road and reinforce the existing vegetation patterns.  The photomontage of VP33 [APP-229] suggest a hedge at the southern edge of	There are no specific mitigation proposals for W11 in the OLEMP.  The expanse of W11 remains too great. While further mitigation of form of infield hedges would alleviate some of the adverse visual effects from La Hogue Road and Farm, this would not be appropriate within the historic and characteristically open landscape, except on the southern side of W11.  The changes in character to La Hogue Road as a result of enabling road works would constitute residual adverse effects that have not been adequately assessed.	Without prejudice, if W11 is retained, all existing hedgerows around the parcel, including along La Hogue Road should be maintained and strengthened for the duration of the project.  The additional hedgerow on the southern side of W11 (see Photomontage for VP33) should be included on the Environmental Plan and the Hedgerow Plan and be mentioned in the OLEMP.  The distance between the hedgerows should be no less than 10m to provide a visual corridor.  Additional mitigation proposals would need to be provided to mitigate the adverse effects to the character of La	The current proposals are the result of early discussions with the Applicant; however, the Councils' primary position remains that this development is unsuitable for the historic landscape, and the resulting effects are not capable of being sufficiently mitigated to be made acceptable.	There is very little scope to alleviate the residual effects of the proposals in this area, as mitigative planting is considered to be its own adverse impact.  The residual visual impact from La Hogue Farm would be slightly reduced.  However, detrimental residual effects on the historic landscape and the setting of the Chippenham Registered Park and Garden remain.

	W11, parallel to the exiting hedge (north or W12).		Hogue Road resulting from enabling road works -Replacement hedging should be provided behind passing places to restore the continuity of this feature.		
W12	The extent of the solar panels has been located to ensure a physical separation from the boundary wall of Chippenham Park and Chippenham Hall.  New hedgerow and woodland are proposed along the northern edge of these parcels to provide visual screening from La Hogue Road.  New woodland, hedgerow, mixed scrub and rush pasture is also proposed along the northern edge of W10, to provide visual screening from the same road and reinforce the existing vegetation patterns.  The Environmental Plan (sheet 12) shows a proposed hedgerow along the boundary with the A11, management of the parcel for pollinators and conservation grazing.	There are no specific mitigation proposals for W12 in the OLEMP.  Should W12 be retained, the proposed grassland buffer and hedgerow planting along La Hogue Road is acceptable; however, the expanse of W12 remains too great.  While further mitigation of form of infield hedges would alleviate some of the adverse visual effects from La Hogue Road and Farm, this would not be appropriate within the historic and characteristically open landscape.  The changes in character to La Hogue Road as a result of enabling road works would constitute residual adverse effects that have not been adequately assessed.  Loss of the continuity of the roadside hedge along La Hogue Road (passing places) and towards parcel W09 and W11 (internal access roads).	Without prejudice, if W12 is retained, all existing hedgerows around the parcel, including along La Hogue Road should be maintained and strengthened for the duration of the project.  Additional mitigation proposals would need to be provided to mitigate the adverse effects to the character of La Hogue Road resulting from enabling road works -Replacement hedging should be provided behind passing places to restore the continuity of this feature.	The current proposals are the result of early discussions with the Applicant; however, the Councils' primary position remains that this development is unsuitable for the historic landscape, and the resulting effects are not capable of being sufficiently mitigated to be made acceptable.	Detrimental residual effects on the historic landscape and the setting of the Chippenham Registered Park and Garden remain.  However, detrimental residual effects on the historic landscape and the setting of the Chippenham Registered Park and Garden remain.
W15	The solar panels have been offset from the 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.	With the current proposals <b>W15</b> would be likely to be <b>remain visible form the A11</b> through gaps in the roadside vegetation.  There may be <b>views onto the solar farm from Dane Hill Cottages</b> (which was not assessed in detail).	Mitigation around perimeter needs to be more robust.  The offset from the watercourse needs to be clarified,  Riparian vegetation should be strengthened.  Along the boundaries where no woodland or hedge is currently proposed further planting proposals are required.	This has been discussed with the applicant, but insufficient progress was made.	Residual visual effects of the parcel would be reduced to close to zero over the medium to long-term.

W17	Siting the primary construction compound and the BESS and substation within W17, so that it is in part adjacent to existing barns and bordered by the mature woodland of Sounds Plantation which aids in screening the structures from the west and in views from the east, their suitable rendering in the context of the woodland, to aid in reducing the perceived overall massing of the structures;	The photomontage of VP33 [APP-229] suggests that some of the built structures would be breaking the skyline and would be visible, even at year 15, adversely affecting views from La Hogue Road, including the Farm Shop entrance.  Tree loss: While not shown on the Environmental Plan, the AIA [REP5-052/053] show several trees (including some that look very mature) as earmarked to be removed from the existing hedgerow between W17 and W08. These trees have not yet been accurately assessed.	Without prejudice, the built structures should be designed and sited, as far as possible, so that do not break the skyline.  Justification should be provided why these trees need to be removed. Any Category A/B trees or Veteran trees that may be surveyed at a later stage should be retained.	This has been discussed with the Applicant. However, no further information is expected to come forward prior to the detailed design stage post determination.  The Councils have raised concerns with regards to insufficient arboricultural and hedgerow information on multiple occasions.	The residual effects would be minimised.  However, detrimental residual effects on the historic landscape and the setting of the Chippenham Registered Park and Garden remain.
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### Other thoughts:

• The retained existing vegetation should be protected from reduction or removal to the same degree as mitigation planting, as the overall mitigation of the scheme relies on this vegetation.