

From: [REDACTED]
To: [Sunnica Energy Farm](#)
Cc: [REDACTED]
Subject: Response to request for information dated 14 December 2023 [PM-AC.FID3712178]
Date: 11 January 2024 12:08:28
Attachments: [REDACTED]

Dear Sirs,

On behalf of Sunnica Limited I attach its response to the letter published on the Planning Inspectorate's website on 14 December 2023. The response includes a letter and 1 enclosure being a landscape technical note authored by Jon Rooney.

I should be grateful if you could please acknowledge receipt.

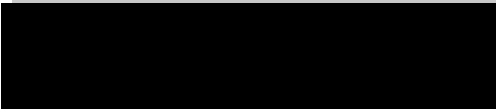
Kind regards

Tom Edwards [REDACTED]
**Senior Associate
Solicitor (England & Wales)**



For Pinsent Masons LLP

PA(s) : Sydney Wigzell [REDACTED] [\[REDACTED\]@pinsentmasons.com](mailto:[REDACTED]@pinsentmasons.com)



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Pinsent Masons

BY E-MAIL

FAO of Mr John Wheadon
Head of Energy and Infrastructure Planning Delivery
Department for Energy Security and Net Zero
3-8 Whitehall Place
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SW1A 2AW

Your Ref EN010106
Our Ref: 145319028.1\661999.07003

DDI [REDACTED]
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11 January 2024

Dear Mr Wheadon

PLANNING ACT 2008 AND THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES 2010

APPLICATION BY SUNNICA LIMITED FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE PROPOSED SUNNICA ENERGY FARM

RESPONSE TO REQUEST FOR INFORMATION FROM SECRETARY OF STATE DATED 14 DECEMBER 2023

Pinsent Masons LLP is instructed by Sunnica Limited ("**Sunnica**") in respect of its application for an order granting development consent for the Sunnica Energy Farm ("**SEF**"). This letter is Sunnica's response to the Secretary of State for Energy Security and Net Zero's ("**Secretary of State**") request for information dated 14 December 2023 ("**Request for Information**"). The Request for Information uses numbered paragraphs and headings which are reflected in this response.

1. **LANDSCAPE/VISUAL IMPACTS (PARAGRAPHS 3 AND 4 OF THE REQUEST FOR INFORMATION)**
 - 1.1 Sunnica encloses a Landscape Technical Note with this letter which has been prepared by Jon Rooney, Associate Director of Landscape Architecture at Arup, in response to paragraph 3 of the Request for Information. As explained in the Landscape Technical Note, Mr Rooney has advised Sunnica from conception of SEF and is a highly experienced landscape practitioner. He addressed the Examination on matters relating to landscape and visual impacts.
 - 1.2 In summary, Sunnica's position is that the proposed mitigation is appropriate and proportionate to the likely impacts, and thus the best available. Further mitigation

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measures beyond those set out in the relevant documents should not be required. The proposals have been designed to avoid nationally and locally designated landscapes. The approval of the detail of landscaping by relevant planning authorities would be secured through Requirement 8 of the draft DCO, in accordance with the outline proposals in the outline landscape and environmental management plan. The further proposals made by the local authorities and other interested parties all relate to the substantial reduction of the solar array, which would not be justified having regard to the terms of paragraph 5.9.21 of EN-1 (2011) and the identified pressing need for renewable energy generation, including solar.

- 1.3 In respect of paragraph 4 of the Request for Information, Sunnica confirms that the Glint and Glare assessment [Examination Library Reference APP-121, page 34] assumes an anti-reflective coating is applied to the solar modules as part of its assessment. It is acknowledged that this is not secured in the Design Principles [Examination Library Reference REP6-037]. However, that is because anti-reflective coating is generally now included on utility scale solar modules, as part of industry wide technological improvements that have occurred in the last few years. Many of the solar modules currently being considered by Sunnica produced by the main solar PV manufacturers include anti-reflective coating as standard.
- 1.4 It is worth noting that solar modules are designed to absorb sunlight and not reflect it, with manufacturers aiming to maximise the efficiency of the modules. Appendix B of the Glint and Glare assessment [Examination Library Reference APP-121] refers to a publication in 2010 by the US Federal Aviation Administration (FAA) based on a previous generation of solar PV panels that shows the reflectivity from solar PV modules at the time was only 5%, the same as standing water. In comparison snow was shown to reflect 80% of light, vegetation reflects 50%, and soil reflects 30%. Research published in 2009 (also referred to in Appendix B of the Glint and Glare Assessment) revealed that the reflectivity of a solar panel is considerably lower than that of 'standard glass and other common reflective surfaces.'
- 1.5 In light of the above, Sunnica is content to secure an anti-reflective coating on the solar modules which would be utilised for SEF. This could be added to the Design Principles as referenced above but for simplicity Sunnica considers that anti-reflective coating could be secured by a modification to the draft DCO [Examination Library Reference REP10-005] to address this issue. Sunnica suggests that requirement 6 (detailed design approval) in Schedule 2 of the draft DCO could be amended so that a further sub paragraph (k) is added to paragraph (1) which states:

“the anti-reflective coating to be used on the solar modules in Work No.1”

2. **BRECKLAND SPECIAL PROTECTION AREA (“SPA”)**

- 2.1 This part of the Request for Information is similar to the Secretary of State’s request for information dated 27 July 2023. Natural England responded to that request on 4 August 2023. Paragraph 5 of the Request for Information is directed to Natural England, but Sunnica provides a short response below.
- 2.2 Sunnica does not have any additional information of Natural England’s research into the functional linkage of stone curlew populations of the Breckland SPA, which it referenced in its Deadline 5 submission [Examination Library Reference REP5-096] and its Deadline 7 submission [Examination Library Reference REP7-104]. As far as Sunnica is aware, it remains unpublished.



- 2.3 In its Deadline 5 submission Natural England confirmed that *“As a result of this work, we now consider that the birds found within the order limits and within 500m of the order limits are not functionally linked to the SPA and therefore do not need to be considered within the scope of a Habitats Regulations Assessment”*. The Examining Authority invited Natural England to supply the evidence from its studies in its second round of questions. Natural England confirmed in its Deadline 7 submission that the document remains in draft and is not ready for publication but confirmed in that submission: *“The stone curlew nests found during the surveys carried out by the applicant are all over 4km away from Breckland Farmland SSSI, the component part of Breckland SPA designated for stone curlew. Natural England, therefore, does not consider these birds to be part of the SPA population.”*
- 2.4 This position was re-stated in Natural England’s 4 August 2023 response to the request for information from the Secretary of State, dated 27th July 2023, which states *“The draft evidence document, which will provide advice on whether populations of stone curlew are functionally linked to Breckland SPA is not yet publicly available and we are not currently able to provide a date by which it will be published. However, our advice remains consistent that the birds found within the order limits and within 500m of the order limits, are not functionally linked to the SPA and therefore do not need to be considered within the scope of the Habitats Regulations Assessment.”*

Yours sincerely
Tom Edwards
Senior Associate
for Pinsent Masons LLP
This letter is sent electronically and so is unsigned

Enclosure: Landscape Technical Note

Technical Note

Project title	Sunnica Energy Farm
Job number	288127-00
Prepared by	Jon Rooney
Date	11 January 2024
Subject	Response to the Secretary of State for Secretary of State for Energy Security and Net Zero regarding landscape and visual matters

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1. Landscape/visual impacts

1.1 Question 3 - Introduction

The Landscape and Visual Impact Assessment (LVIA) (Chapter 10 of the Environmental Statement [Examination Library Reference APP-042]) that forms part of the Development Consent Order application for the Sunnica Energy Farm (the Scheme) and the design of the multi-functional mitigation and enhancement measures embedded in the Scheme were led by Jon Rooney, an industry leading expert and advocate for landscape-led design of major development at leading consultancy, Arup.

Mr Rooney's expertise is recognised through his position on the Landscape Institute Technical and Research Committee and his previous role on the Guidelines for Landscape and Visual Impact Assessment (GLVIA) Panel. He was lead author of technical guidance on infrastructure (Technical Guidance Note 04/20), published by the Landscape Institute, which includes specific considerations for solar farm development. He also recently contributed to the Institution of Civil Engineers' (ICE) Manual of Blue Green Infrastructure.

Landscape professionals, led by Mr Rooney, have been involved in the iterative design of the Scheme from the outset to ensure that the likely landscape and visual effects play an important part in the evolution of the design of the Scheme. Paragraph 4.7 of Guidelines for Landscape and Visual Impact Assessment, 3rd Edition (GLVIA3) explains that this is good practice as it allows analysis of the landscape and visual character of a site and its context, and approaches to siting and design, to minimise possible landscape and visual effects early in the process. Further information on how the design of the Scheme has evolved is provided in the Design and Access Statement [Examination Library Reference REP3A-032].

Mr Rooney worked collaboratively with the design team and environmental specialists, supported by landscape architects at AECOM and Arup with extensive experience in designing large-scale infrastructure projects which minimise harm and integrate positively with the landscape. Mr Rooney has been involved in the Scheme's development from the earliest stages of the pre-application phase through to submission of the DCO application. Mr Rooney has attended issue-specific hearings and accompanied site inspections on behalf of the Applicant. This landscape-led design approach has also been successfully employed on other consented schemes led by Mr Rooney, including the Longfield Solar Farm and the A428 Black Cat to Caxton Gibbet Road

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Improvements projects, the DCOs for which were granted 2022 and 2023 respectively. Mr Rooney is the author of this response.

1.2 Question 3i: provide any updates to its position on the mitigation provided for landscape and visual impacts

The Applicant carried out an extensive and detailed LVIA as part of the Environmental Impact Assessment process, the results of which are set out in the Environmental Statement [Examination Library Reference APP-042]. The LVIA provides an assessment of the impacts of the Scheme on the landscape as a resource in its own right, and a separate but related assessment of the impacts on people's views of the landscape. The design of the Scheme was landscape-led from the outset, informed by the LVIA and consultation. It has evolved to respond positively to the local landscape character and to mitigate impacts on people's views and visual amenity, while addressing the ecological and heritage constraints and opportunities within the Scheme's context. These measures have been integrated and embedded within the Scheme in line with best practice.

The Applicant has worked with the local councils to agree the mitigation to reduce the effects of the Scheme to an acceptable level. This resulted in some further changes to the Scheme design made during the Examination, which are detailed further in our response to Question 3ii below. The Applicant has not been able to accommodate all of the changes proposed by the Councils, especially where these would require the removal of large portions of the developable area. The Applicant reached this conclusion with paragraph 5.9.21 of National Policy Statement EN-1 (2011) in mind (the same paragraph is now in paragraph 5.10.26 of EN-1 (presented to Parliament, November 2023)). That paragraph says:

“Reducing the scale of a project can help to mitigate the visual and landscape effects of a proposed project. However, reducing the scale or otherwise amending the design of a proposed energy infrastructure project may result in a significant operational constraint and reduction in function – for example, the electricity generation output. There may, however, be exceptional circumstances where mitigation could have a very significant benefit and warrant a small reduction in function. In these circumstances, the [Secretary of State] may decide that the benefits of the mitigation to reduce the landscape and/or visual effects outweigh the marginal loss of function.”

However, the loss of the generation capacity from the Scheme that has been proposed by the Councils could in no way be reasonably characterised only as a “*small reduction in function*”. The site was selected because it avoids nationally and locally designated landscapes, applying the hierarchical approach in paragraphs 5.9.8 to 5.9.17 of National Policy Statement EN-1 (2011). This is explained further in response to question 3ii below. As outlined in its response to second written questions (see Q2.0.6 in REP5-56), the Applicant maintains its position that the removal of the parcels proposed by the Councils would not result in a very significant landscape or visual benefit.

The position of the Applicant on the mitigation for landscape and visual impacts is set out in the DCO documentation and through the documents and representations submitted to the Examination. No changes have been made to the mitigation provided for landscape and visual impacts since the changes made during the Examination. This includes those shown in the updated Environmental Masterplan [Examination Library Reference REP10-050 and REP10-051] Outline Landscape and Ecology Management Plan (the latest version of which was submitted by the Applicant in response

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to the Secretary of State's Consultation of 1 September 2023¹). Should the Scheme receive Development Consent, then final design details of the Scheme will be produced and submitted for approval to East Cambridgeshire District Council and West Suffolk Council as required under Requirement 6 (detailed design approval) and Requirement 8 (landscape and ecology management plan).

In summary, the Applicant's position remains that there is no further mitigation which would reduce the adverse effects reported in the Environmental Statement beyond the substantial commitments already set out in the submitted documents and which are secured via Requirement in Schedule 2 to the draft Development Consent Order [Examination Library Reference REP10-005]. This is because additional planting would either not further reduce the magnitude of impacts or would introduce additional changes to the character of the landscape and would not therefore be reasonable or appropriate.

1.3 Question 3ii: *With the aim of minimising harm to the landscape and visual effects as far as reasonably possible, advise whether their work concluded that the proposed mitigation was the best available or if any further mitigation could reasonably be provided*

1.3.1 Policy test in respect of mitigation

Paragraph 5.9.8 of National Policy Statement (NPS) EN-1 (2011) states that "*Projects need to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate.*" This same policy test is set out in paragraph 5.10.6 of NPS EN-1 (presented to Parliament, November 2023). It is acknowledged that the Scheme will be determined under section 105 of the Planning Act 2008 and the NPSs will be an important and relevant matter for the decision maker. Given it is likely that the November 2023 NPSs will be designated by the time the Scheme is determined, the Applicant considers that the November 2023 NPSs should be considered an important and relevant matter, and the continuation of the previous policy is therefore relevant.

The NPS policy test is whether the mitigation provided to minimise harm on the landscape is reasonable and appropriate, which the Applicant considers has been met by the design set out in the Outline Landscape and Ecology Management Plan (the latest version of which was submitted by the Applicant in response to the Secretary of State's Consultation of 1 September 2023) and which will be secured through Requirement 8 of the Development Consent Order.

It must also be considered that introducing further mitigation measures, such as additional planting, would reduce the scale the Scheme and its electricity generation output. This is not warranted in the context of the policy in paragraph 5.9.21 of NPS EN-1 (2011) and paragraph 5.10.26 of NPS EN-1 (2023), especially given the lack of landscape designation (both national and local) and only one remaining residual visual effect the Scheme has which is of moderate significance in year 15 of operation. Several changes have been made to the design where it was determined that a significant benefit would arise from additional mitigation and would warrant a small reduction in function.

¹ The only change made to this version of the document was updates to the Historic Environmental Management Plan Method Statement in Appendix E as explained in our letter dated 13 September 2023.

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Details of these changes are set out further below. However, these opportunities have been maximised through this process and the Applicant considers that any further mitigation would not therefore be reasonable or appropriate or compliant with the policy in paragraph 5.9.21 of NPS EN-1 (2011) and paragraph 5.10.26 of NPS (2023).

There is no reference in NPS EN-1 to the fact that proposed mitigation should be the “*best available*”. However, in this context the mitigation for the Scheme has been designed to be multi-functional and to achieve the best landscape fit with the prevailing landscape character, which varies across the Order limits. Accordingly, having regard to the relevant NPS, the mitigation can be described as the best available.

NPS EN-1 also recognises that the scale of renewable energy NSIPs necessarily means they will have effects on the landscape (see paragraph 5.9.8 of EN-1 (2011) and paragraph 5.10.5 of EN-1 (2023)) and the question that is posed for determination is whether the effects would be so damaging that they outweigh the significant benefits offered by this renewable energy scheme (as required by paragraph 5.9.21 of EN-1 (2011) and paragraph 5.10.26 of EN-1 (2023)). NPS EN-3 (presented to Parliament, November 2023)). As stated above, the Applicant contends that this is an important and relevant matter in the determination of the Scheme and also indicates that large solar farm developments may have a significant zone of visual influence. Paragraph 2.10.95 of EN-3 (2023) notes that, “...*whilst it may be the case that the development covers a significant surface area, in the case of ground-mounted solar panels it should be noted that with effective screening and appropriate land topography, the area of a zone of visual influence could be appropriately minimised.*” This has been clearly demonstrated for the Scheme, the site of which has been selected because it relates to a relatively flat landscape within generally strong patterns of existing vegetation which can be reinforced by the substantial setbacks and planting incorporated into the design. This will limit the extent of views of the Scheme, such that only one residual visual effect, which is considered to be of moderate significance, has been identified in year 15 of operation. This relates to views from the Limekilns Gallops (Viewpoint 39), located to the north-east of Newmarket. This view is not identified or protected in planning policy and is already affected by traffic and infrastructure relating to the busy A14 and A11 trunk roads and a railway line, which lie between the Limekilns and the Order limits. Further consideration to this view is given below.

The LVIA clearly shows that, although there will be some residual impacts on the landscape, these are clearly outweighed by the benefits of the Scheme and in particular the provision of a significant amount of low carbon energy in accordance with the Government’s energy policy. The Applicant has also concluded that additional mitigation would either not further reduce the magnitude of impacts or it would introduce additional changes to the character of the landscape and would not therefore be reasonable or appropriate. These conclusions are supported by Applicant’s position on ‘parcel by parcel’ mitigation and residual effects document submitted at Deadline 8 of the Examination [Examination Library Reference REP8-026] and the further information provided on intra-cumulative landscape and sequential visual effects at Deadline 2 [Examination Library Reference REP2-038 – Appendix K].

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1.3.2 Landscape designations

NPS EN-1 (both 2011 and 2023 versions) recognises that virtually all nationally significant energy projects will have effects on the landscape. It takes a hierarchical approach to considering these effects, guiding development towards landscapes which are not designated, such as is the case for the Scheme. The Scheme accords to this hierarchical approach, with no part of the Scheme falling within a nationally designated landscape with statutory status. Furthermore, it is common ground that the Scheme will not affect a nationally designated landscape beyond its boundaries, such as in relation to views or setting.

Following the consideration of nationally designated landscapes and potential effects outside the boundaries of nationally designated landscapes, the NPSs refer to local landscapes that may be highly valued locally and protected by local designation. The Applicant has carried out a detailed assessment of the value attached to the landscape and has not identified any landscapes protected by local designation. Furthermore, there is no evidence in Local Plan policy that supports the conclusion that the landscape within or surrounding the Scheme meets the threshold to be considered valued landscape. Even if there had been local landscape designations, paragraph 5.9.14 (EN-1, 2011) and paragraph 5.10.12 (EN-1, 2023) is clear that they should not be used in themselves to refuse consent.

In conclusion, this hierarchical approach was a key factor in the original site selection process, which was applied to avoid landscapes with the highest value. The Application Site is not within or in proximity to a nationally or locally designated landscape and local planning policy does not identify these areas as being of high landscape value.

1.3.3 Design

The Applicant has applied a landscape-led, iterative approach to the design of the Scheme from the outset. This process continued throughout development of the application for the Development Consent, informed by the results of the Environmental Impact Assessment and in response to consultation. This approach is in line with the criteria for good design set out in NPS EN-1 (both 2011 and 2023) and current best practice, including GLVIA and the Infrastructure Technical Guidance Note 04/20 published by the Landscape Institute.

Effective landscape mitigation must balance many factors in order to be appropriate. Best-practice shows that simply enclosing the Scheme with dense vegetation so that it is not visible is not the right solution. This is supported by paragraph 4.26 of GLVIA3, which states that “*measures that are simply added on to a scheme as ‘cosmetic’ landscape works, such as screen planting designed to reduce the negative effects of an otherwise fixed scheme design, are the least desirable. It should also be remembered that well-designed new development can make a positive contribution to the landscape and need not always be hidden or screened.*” Good design is therefore about creating a balance between the different environmental functions and the ecosystem services that these will deliver and this is the approach that has been taken for the Scheme.

The Order limits lie at the point of transition between three National Character Areas (NCA), defined by Natural England; the Fens (NCA 46), the Brecks (NCA 85) and East Anglian Chalk (NCA 87). The design has been informed by landscape character assessments at the national, regional and local scale. This has influenced the design principles so that the proposed mitigation

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responds to character of the different parts of the Application Site. This is explained further in the Outline Landscape and Ecology Management Plan (the latest version was submitted by the Applicant in response to the Secretary of State's Consultation of 1 September 2023).

The design detailed within the application goes substantially further than mitigation, for example by reinforcing the green infrastructure network, delivering an overall biodiversity net gain of 37.45%, providing additional public amenity and materials to assist in the interpretation of local cultural heritage, all of which are secured by Requirements contained in Schedule 2 to the proposed Development Consent Order [Examination Library Reference REP10-005].

Several changes were made during the Examination, as a result of continued surveys, analysis and engagement with the Councils and other interested parties through face-to-face design workshops. This included removing the Sunnica West B site based on archaeological evidence, removing panels within Sunnica East Site B to introduce further setbacks from important and locally valued landscape features and increasing the width of proposed planting in Sunnica West Site A to strengthen enclosure. A summary of key changes incorporated into the design during the Examination is set out below, with further detail provided in the parcel-by-parcel mitigation and residual effects document submitted at Deadline 8 of the Examination [Examination Library Reference REP8-026].

1.3.3.1 Sunnica East Site A (Isleham) Environmental Masterplan Overview Plans Sheet 2 of 5 [REP10-041]

Parcel E05 to the east of Isleham and north of Freckenham was identified as an opportunity to substantially enhance biodiversity, appreciation of cultural heritage and public amenity. Permissive paths were introduced around the perimeter of the parcel and gaps made in the boundary vegetation to allow views towards the site of the crash site of a B50 aircraft in 1949. The design was further enhanced with the introduction of groups of trees and shrubs south of Parcel E05 and a viewing and seating area with a permanent memorial to those who lost their lives in the crash. These additional measures and the introduction of further hedgerow planting around ECO1 and ECO2 are also important in deterring access to these stone curlew habitat areas to the south of Beck Road.

Other additional mitigation measures added during the Examination through continued engagement with the Councils include tree planting along the Lee Brook and increases to the width and density of planting where possible to strengthen visual screening of the proposed substation and BESS within Parcel E33.

1.3.3.2 Sunnica East Site B (Worlington) Environmental Masterplan Overview Plans Sheet 3 of 5 [REP10-041]

Concerns about the proximity of solar panels to the tree-lined unclassified road U6006 were further addressed by changing the design to incorporate a larger set back of 35m either side. The compromise increased the legibility of this landscape feature and its integrity through interplanting. It reduced the area of E12 and E13 available to renewable energy generation but retained the viability of these parcels.

Other changes incorporated within this site include further interplanting of existing characteristic pine lines to improve their screening function and age structure. This included increasing the width of planting along the southern edge of Parcel E18 to 25m to reinforce screening of the proposed

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substation and BESS. The width of planting around parcels E19 to E22 south of Elms Road was also increased to 15m where possible. Some later changes requested by the Councils, such as an additional hedgerow along the northern edge of Parcel E26 were not included because they would introduce other effects, such as in this case reducing the natural surveillance of users of an adjacent permissive path.

1.3.3.3 Sunnica West Site A (Chippenham) Environmental Masterplan Overview Plans Sheet 4 of 5 [REP10-041]

Interplanting within the tree belts which line the avenue of Chippenham Park within Parcel E04 is proposed to reinforce its integrity, biodiversity and enhance its age structure. Additional planting was requested along the edge of W09 to address views from the adjacent A11 trunk road. This was not considered reasonable or appropriate because these views are short, transient and from a high-speed road and would have required a further reduction in the renewable energy generating capacity of the Scheme.

A further change was made with respect to Parcel W10, where shrub planting and a hedgerow were added to increase enclosure, biodiversity, habitat connectivity and visual screening from La Hogue Road. Additional hedgerows were also added to the boundaries of Parcel W12 and interplanting to strengthen screening of the substation and BESS in Parcel W17.

The potential for further mitigation of the significant residual visual effects identified for users of the Limekilns Gallops (Viewpoint 38) was considered. This involved modelling an earthwork bund on the southern side of Parcels W05 and W07, parallel with the A14 trunk road. Various heights were tested, up to 4m above the existing ground level. Introducing this model and proposed planting into the photomontage for Viewpoint 38 identified that, by year 15 of operation, the proposed bund would result in only a marginal improvement in visual screening. This is because the Limekilns Gallops extends to above 50m Above Ordnance Datum (AOD), whilst the land within Parcels W05 and W07 is approximately 25m AOD. It was also considered that an earthwork bund at this height would be incongruous in the predominantly flat landscape. It would require a footprint of up to 27m with a maximum height of 4m and approximately 40,000m³ of material to be imported, introducing other effects including increased construction traffic and carbon emissions. Overall, it was concluded that the small improvement in visual mitigation would be outweighed by the additional adverse environmental effects and the reduction in the area available for renewable energy generation. These changes would therefore not result in a significant benefit outweighing the reduction in function and would not be reasonable or appropriate. This additional mitigation was therefore not included in the final mitigation design.

2. Summary and conclusions

In summary, the Applicant continued to review the proposed mitigation and enhancement measures throughout the Scheme design before submission of the application and during the Examination. Several changes were made to the design to address feedback from the community and other stakeholders, including the Councils. These changes included increasing the width and density of existing vegetation and proposed planting. The Applicant has concluded that no further mitigation of landscape and visual effects is required as it would not mitigate the landscape and visual effects further and so is not reasonable or appropriate. For there to be any additional effective mitigation

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this would necessitate a substantial reduction in the function of the Scheme which is not warranted, nor would it comply with requirements of paragraph 5.9.21 of EN-1 (2011) and paragraph 5.10.26 of EN-1 (2023).