

Say No To Sunnica Action Group Ltd



26 January 2024

Dear Mr Wheadon,

Planning Act 2008 (as amended)

**Application by Sunnica Ltd for an Order Granting Development Consent for the
Sunnica Energy Farm (the DCO Application)**

Interested Party ID 20031080

We refer to your invitation of 15 January 2023 to comment on responses received to your letter of 14 December 2023. The topics covered in the consultation responses to which we respond are as follows:

Landscape

We attach a briefing note from our Landscape Expert, Michelle Bolger Expert Landscape Consultancy, on this matter.

As our expert notes, the flaws of the Sunnica scheme are embedded within the original development of the project. Thus, the reliance on para 5.9.8 of EN1 (2011) and para 5.10.6 of EN1 (2023) to resist mitigation is misplaced. The scheme has not been designed carefully with regard to siting and has not minimised harm to the landscape; in those circumstances suggestions of changes and mitigations go to compliance with policy as a whole (and cannot be dismissed as mere mitigations which may only be applied in exceptional circumstances). In essence, the Applicant's approach is to put an 'exceptional circumstances' threshold in front of any suggested change or mitigation in respect of design and scale regardless of how unacceptable in policy terms the overall scheme is. This puts the cart before the horse; it is first for the Applicant to demonstrate that the scheme is designed carefully with regard to siting and minimising harm to the landscape. We consider that has not been done and, as such, the changes and mitigations suggested go to overall compliance with EN1.

Without repeating the briefing note, one key point to consider is the unusual design of Sunnica when compared to other schemes of this size. Sunnica is a disaggregated scheme which exists in pockets across the landscape. This sets it apart from all other NSIP schemes that have been determined to date (e.g. Longfield, Cleve Hill, Little Crow). While Longfield existed as one single area of PV cells (occupying a total space of approx. 453 hectares for its installed capacity of 500 MW), Sunnica is spread across the entire landscape (and occupies a total space around double Longfield for the same installed capacity). This means that the Sunnica scheme is unique in having a cumulative impact with itself; towns and villages feel surrounded by the energy farm and experience an industrialisation of the landscape. The Secretary of State is referred to Chapter 2 and Appendix B of SNTS's Written Representations **[REP2-240]** where comparisons to the other DCO level schemes are set out.

If consented, Sunnica will set a new standard¹ for harm to landscape and visual amenity that goes far beyond existing aggregated developments. Refusing permission for this scheme is, we say, compliant with the National Policy Statements as it is a proper response to the poor design of the scheme which amplifies harm by its unusual, disaggregated form. It also would reflect the failure of the Applicant to recognise landscape value in the area more generally, including in respect of the Limekiln Gallops. A refusal of this scheme would not indicate a general failure to meet the needs of the UK in achieving net zero and energy security; rather, it would be a refusal of an out of the ordinary application which includes harms to landscape which far outstrip similar proposals of the same size.

Stone Curlew

We attach a letter from our Ecology Expert, Bioscan, on this matter as well as a note from the Cambridgeshire Wildlife Trust.

Natural England's position is that it is 'unlikely' that the report as published will change its advice in respect of the Sunnica application. This inserts a level of doubt into the conclusions that Natural England has previously reached and moves the case further away from the level of certainty required in law on this issue. There remains an absence of evidence from Natural England in respect of the functional linkage between the development site and the Breckland SPA population of stone curlew. It is that very absence which the law responds to in requiring a high level of certainty. As such, SNTS maintains that a precautionary approach must be

¹ As a result of the precedent led approach described in the NPS: EN1 para 5.10.25.

taken in respect of this issue, in line with the requirements set out in law and policy (and repeated at length throughout the Examination).

Yours sincerely

Dr C Judkins (Director)

(electronically signed)

Landscape Briefing Note 20

Project: 1186 Sunnica PVD
Date: 25th January 2024
Purpose: Review of Sunnica's Responses to Secretary of State's Letter of 14/12/24
Reference: 1186 BN20 Sunnica PVD 2024 Response 240125.docx
Prepared by Michelle Bolger FLI

Introduction

1. This Landscape Briefing Note has been prepared on behalf of Say No to Sunnica (SNTS). It responds to a Technical Note prepared on behalf of Sunnica Energy Farm (Sunnica) by Jon Rooney of Arup. The Technical Note was prepared in response to a letter from the Secretary of State's (SoS) dated 14/12/23 which requested further information on:
 - 3) *With reference to NPS EN-1 paragraph 5.9.8, the Applicant is asked to:*
 - i) *provide any updates to its position on the mitigation provided for landscape and visual impacts.*
 - ii) *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.*
2. The introduction to the Technical Note sets out Mr Rooney's role in the Sunnica Project. In addition, it sets out some of Mr Rooney's experience including that 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.' As far as we can ascertain this is the first reference to Technical Guidance Note (TGN) 04/20 during the DCO Application and Examination. We are not aware of it being referenced by any of the landscape witnesses to the Sunnica DCO. It is not referenced in the LVIA which was written under the supervision of Mr Rooney, although both TGNs 6/19 and 02/19 are referenced.

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3. Having reviewed TGN 04/20 we consider the reason that it is not referenced by any of the landscape witnesses is that it does not contain any specific guidance on undertaking an LVIA for solar farm development. On the question of undertaking an LVIA for solar farm development the section on Solar Farms (paragraphs 8.75-8.79, pages 46-47) simply refers to a BRE document '*Planning guidance for the development of large-scale ground mounted solar PV systems*'¹. The BRE document was published in 2013 and the authors of TGN 04/20 acknowledge it '*is based on advice from the Cornwall Council Landscape and Urban Design Unit and may be helpful in informing the scope and broader considerations of design, but its approach pre-dates the introduction of GLVIA3.*' (My emphasis). Not only does the BRE document predate GLVIA3, but it contains no references to valued landscapes or inevitably TGN 2/21 as it was published eight years earlier. The BRE document is now more than 10 years old. It is not helpful in assessing landscape and visual impacts of the scale or fragmented nature of the Sunnica proposals. I assume it is for this reason that it was not referred to by any of the landscape witnesses to the Sunnica DCO until this Technical Note.
 4. The 2023 revised NPSs (EN-1 to EN-5) came into force on 17 January 2024. I have therefore referred to the text and paragraph number in the 2023 revised NPSs. References to EN1 are to the 2023 version of EN1 unless stated otherwise.

¹ Technical Guidance Note (TGN) 04/20 Paragraph 8.78

Q 3i Updates on mitigation provided for landscape and visual impacts.

5. The SoS's question with regard to mitigation refers to EN1 2011 paragraph 5.9.8. This paragraph does not appear in EN1 2023 but is split between several paragraphs including 5.10.6 which repeats the second half of EN1 2011 paragraph 5.9.8:

'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.'

6. In response to this, the Technical Note seeks to rely on Paragraph EN1 (2023) 5.10.25 to justify its refusal to amend the scheme in order to minimize harm to the landscape. This reliance is based on taking Paragraph 5.10.25 in isolation rather than reading it as part of the whole of EN1. Paragraph 5.10.25 states that...*"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 IPC may decide that the benefits of the mitigation to reduce the landscape and/or visual effects outweigh the marginal loss of function."*
7. Sunnica contends that the mitigation measures recommended by SNTS and by the Councils would result in a noticeable reduction in function and, based on EN1 Paragraph 5.10.25 taken in isolation, are therefore not consistent with EN1. However, Sunnica's claim, that EN1 should be interpreted to mean that any changes which result in more than a *'small reduction in function'* are unacceptable, cannot reasonably be correct. If it were, virtually all changes to a submitted scheme would be unacceptable. This would be the case however poorly sited and designed the originally submitted scheme was, and however many significant harms were identified post submission.
8. We consider that EN1 Paragraph 5.9.21 is only applicable if all the earlier stages of Section 5.10 Landscape and Visual in EN1 have been undertaken correctly. With regard to the Sunnica proposals this is not the case. For example, concerning EN1 Paragraph 5.10.6 (quoted in paragraph 6 above), the failure in the early stages of siting and design to recognise the cultural and landscape value of the Limekilns Gallops means that the Sunnica scheme has not been designed carefully with regard to siting and has not minimised harm to the landscape.

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9. This failure in the *‘early stages of siting and design, where site choices and design principles are being established’*² means that it was impossible for the applicant to *‘demonstrate in the ES how .. negative effects have been minimised’*³. The only way of minimising the negative effects on the landscape of the Limekilns Gallops is to remove development that is visible from it. This will inevitably result in more than a *‘small reduction in function.’* As the Applicant discovers when trying to retrofit the scheme (described on page 7 of the Technical Note with regard to the creation of a 4m bund along the edge of the scheme) post hoc mitigation is never as effective as making the right choices in the *‘early stages of siting and design, where site choices and design principles are being established’*⁴
10. Sunnica continues to resist recognising the value of the importance of the Limekilns. The Technical Note on page 2 refers back to Sunnica’s response to *‘second written questions (see Q2.0.6 in REP5-056)’*. Sunnica’s response on Page 27 of REP5-056 states that *‘it has been made clear that the Limekilns cannot be considered to be a ‘highly valued landscape.’* Firstly, this is the opinion of Sunnica, it is not an established fact as this sentence suggests. Secondly, it is not clear what Sunnica means by a *‘highly valued landscape’* as discussed below.
11. EN1 at 5.10.11 says *‘Outside nationally designated areas, there are local landscapes that may be highly valued locally.’* However, the term *highly valued landscape* does not appear in the NPPF, EN1 or the Landscape Institute’s TGN 2/21. It is indisputable given the evidence to the Examination that the Limekilns Gallops is *‘highly valued locally’* but we accept that this is insufficient on its own for a landscape to be defined as a valued landscape and have therefore carried out a full assessment as recommended in TGN 2/21. The term *‘highly valued landscape’* is used by Sunnica in its response to the written questions and by being placed in inverted commas suggests, inaccurately, that it is a quotation from somewhere. However, it appears that the term has been coined in order to claim that the Limekilns is not one, even though no definition of a *‘highly valued landscape’* has been provided.

² EN1 (2023) paragraph 5.10.18

³ EN1 (2023) paragraph 5.10.18

⁴ EN1 (2023) paragraph 5.10.18

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12. There is clearly a disagreement between ourselves and the authors of the LVIA as to whether the Limekilns Gallops meets the definition of a Valued Landscape in TGN 2/21 (not a *'highly valued landscape'* for which there is no definition). The definition of a Valued Landscape in TGN 2/21 is *'an area identified as having sufficient landscape qualities to elevate it above other more everyday landscapes.'*⁵ We consider that the value of the landscape is high and it should be considered as a valued landscape for the purposes of NPPF. Even if the authors of the LVIA do not agree that the landscape qualities of the Limekilns are sufficient to meet the test, there should be no disagreement that it is close to meeting the test given all the evidence that has been provided by (among others):
- MBELC - Landscape and Visual Issues Paragraph 7.24 Annex A of SNTS's representations submitted at Deadline 2;
 - SNTS's heritage witness; and
 - The equestrian industry.
13. Even if the authors of the response to the second written questions considered that the Limekilns Gallops does not qualify as an NPPF valued landscape, it is hard to understand how they go from concluding that the Limekilns is not a *'highly valued landscape'* to a judgement that it is a landscape of *'low status'* (Q2.0.6 in REP5-056 Page 27). This is particularly so given the weight of evidence that the Limekilns Gallops does have value from landscape, heritage and community perspectives. Whilst the exact value of the landscape of the Limekilns may be a matter of dispute, the Limekilns is clearly not a landscape of low status.
14. The failure to recognise the value of the Limekilns Gallops and therefore the very significant landscape and visual benefits that would be derived from omitting development that would be visible from the Limekilns appears to be at the root of the Applicant's contention that *'the removal of the parcels proposed by the Councils would not result in a very significant landscape or visual benefit'*.⁶
15. Section 1.2 (the response to the SoS's question 3i) concludes that *'there is no further mitigation which would reduce the adverse effects reported in the Environmental Statement'*. The reasoning behind this conclusion is set out at the end of the paragraph as follows: *'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.'* This entirely ignores the substantial further

⁵ TGN 2/21 Page 42

⁶ Technical Note, Page 2 second to last paragraph

mitigation that would result if the scheme were amended to omit parcels identified by SNTS and the Councils.

16. The final paragraph on page 4 begins: *‘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.’* This is simply not something that an LVIA can show.
17. It is not the role of the LVIA, or the landscape architect, to undertake the planning balance as described above. It is for the landscape architect to identify and quantify the degree of harm/benefit to the landscape and to visual amenity. Where there is harm, as in this instance, it is for others to balance this harm against the benefits of the scheme. As stated throughout the DCO process we consider that the harm to the landscape has not been adequately identified and quantified by the Applicant and that a key element in that failure is as a result of the underestimation of the value of the Limekilns which are assessed by us to constitute an NPPF valued landscape and assessed by the Applicant to have *‘low status.’*

Q 3ii whether the proposed mitigation was the best available or if any further mitigation could reasonably be provided.

18. In response to question 3ii the Technical Note (Section 1.3.1, page 4 third paragraph) refers to EN3 (2023) Paragraph (3.10.86) 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.*’
19. The Technical Note claims that the scheme achieves this due to the character of the existing landscape and the design of the scheme (e.g. substantial setbacks). There is no reference to the fragmented nature of the scheme which inevitably results in a more extensive, dispersed zone of visual influence than would result from a more compact scheme. The fragmented dispersed nature of the scheme means that its zone of visual influence (which has consequences for landscape character as well as visual amenity) has not been appropriately minimised. This is because of early decisions made about the siting and design of the scheme and cannot be addressed by additional mitigation planting.
20. In support of this claim the Technical Note states (also third paragraph on page 4) that ‘ *only one residual visual effect, which is considered to be of moderate significance, has been identified in year 15 of operation.*’ SNTS do not agree that there is only one remaining significant visual effect at year 15 (MBELC - Landscape and Visual Issues Paragraphs 10.22-10.24 submitted at Deadline 2). In addition, the Technical Note does not make clear that although it is described in the LVIA and this Technical Note as Viewpoint 39 in fact it is not a single viewpoint but representative of views from the whole of the Limekilns Gallops. Although the views will vary depending on which part of the Limekilns Gallops the viewer is situated in, the reality is that users of the Limekilns Gallops are likely to be moving through the whole area and therefore likely to experience a range of significant adverse visual impact even at year 15. As noted above, we consider these views to be from a valued landscape.
21. The fact that this viewpoint represents a large group of receptors is acknowledged in the Technical Note Section 1.3.3.3 page 7 paragraph 3 which describes the consideration of further mitigation with regard to the ‘ *significant residual visual effects identified for users of the Limekilns Gallops.*’ 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.*’ The Technical Note concluded that the bund would have only a marginal benefit due to the topography, ‘ *the Limekilns Gallops extends to above 50m Above Ordnance Datum (AOD), whilst the land within Parcels W05*

and W07 is approximately 25m AOD.’ In addition, it *‘would be incongruous in the predominantly flat landscape’* and consequently it *‘would not be reasonable or appropriate.’* We agree with these conclusions. It is not possible to mitigate the impact on the Limekilns Gallops through retrofitting because the impact is an inevitable consequence of the decisions made at the siting stage of the scheme when the value of the Limekilns Gallops was not recognised. The only effective mitigation is the omission of areas within the scheme as identified by SNTS and the Councils.

Other Issues

22. The fact that we have not addressed all issues raised in the Technical Note does not mean that we agree with the Applicant’s assessment. Our views on these matters have been previously submitted, for example the complete change of character that will result for E05 which is a consequence of the solar panels **and** the planting intended to screen them. Sunnica’s claim that openness of landscape around Isleham is at least partly product of post war industrialisation and intensification is incorrect. A large open field structure within Area East A predates the world wars and is visible on first edition OS mapping from 1886. This open character is primarily a result of land management responses to local fenland conditions. This matters, as it shows fundamental misunderstanding by Sunnica of the character of the landscape, including the historic character, its evolution, and the importance of these aspects locally.
23. This is another example of where poor siting and design in the early stages of the proposals cannot be mitigated by retrofitting or additional planting. In this location the planting results in its own adverse impacts.

Summary and Conclusions

24. The Applicant has been unable to identify effective further mitigation measures because the landscape and visual effects of the scheme are a consequence of poor decisions, made early on, regarding the siting and design of the scheme. Of particular consequence were:
 - The decision to pursue a dispersed fragmented scheme which would inevitably result in more widely dispersed effects dispersed;
 - The failure to recognise the value of the Limekilns Gallops; and
 - The failure to recognise the historic character of the landscape near Isleham.

Date: 22nd January 2024
Our Ref: DW/E2132/SNTS/CJ-220124

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Dear Catherine

Proposed Sunnica Energy Farm, EN010106

Natural England letter dated 10 January 2024, and Applicant letter (via Pinsent Masons) dated 11th January 2024, both responding to further information request from Secretary of State dated 14th December 2023.

On behalf of Say No to Sunnica (SNTS), you have invited us to comment on Natural England's (NE's) and the applicant's latest submissions on this proposed development. These are as contained in letters dated 10th and 11th January 2024 and as referenced above. We comment here on the ecology (i.e. stone curlew/Breckland SPA/Habitats Regulations) matter only.

The letters have been submitted in response to a further request for information from the Secretary of State on the matter of stone curlew use of the proposed development site and the degree to which it may be functionally linked to the populations of that species underpinning the Breckland Special Protection Area (SPA). The December 2023 request from the SoS follows on from correspondence exchanges through last year, and after the close of the DCO Examination, around the matter. The issue is relevant to the consideration of potential indirect impacts from the proposed development, whether these engage with the Habitats Regulations, and whether, if so, they have been adequately assessed in accordance with those Regulations.

We previously highlighted the absence of supporting evidence available to the Secretary of State in support of NE's position that it was content there was no functional linkage between the development site and Breckland SPA populations of stone curlew, and the implications of this information vacuum for robust evidence-based decision making and the necessary application of the precautionary principle, in accordance with relevant case law. We remarked that the absence of certainty around this issue represented the very lacunae that established case law requires to be eliminated in order to achieve the high bar of beyond reasonable scientific doubt when dealing with impacts on an SPA protected under the Habitats Regulations.

Our letter of 8th September submitted to the Examination as an appendix to Say No To Sunnica's submission dated 11th September refers, and we invite PINS and the SoS to re-read it as essential context to NE's and the applicant's latest submissions.

We observe that in their most recent submission of 10th January 2024, NE offers no new evidence to assist the SOS. The letter merely states: *“Natural England has not yet completed the draft evidence document regarding its research into the functional linkage of stone curlew populations of the Breckland SPA and therefore it is not publicly available. There is further work required but we do not have any timescales for this or the date of publication. The report as published is unlikely to change our advice provided to date for this proposed development”*.

We previously remarked, in our letter of 8th September 2023, that *“it is simply not good enough for the statutory authority to again merely proclaim, without providing evidence, that it is satisfied that there is no functional linkage (and by extension no potential indirect impact vector) in the relationship between stone curlews affected by the proposed Sunnica project and those underpinning the SPA. There are clear scientific reasons for a precautionary approach to conclude otherwise, not least the relative proximity of the two sites. If the nightly foraging range of stone curlew is taken to be around 3km (e.g. after Green et al. 2006¹) and this is compared with the closest distance between the nearest stone curlew pair documented in the applicant’s surveys (Appendix 8H of the Sunnica ES) and the SPA boundary (a mere 3.2km²), the scope for overlap and interaction is clear. The latitude in site fidelity (males are documented as usually returning to within 15km of their hatching site) also suggests that there is a good chance in any single year that stone curlews nesting within the project site originate from natal territories within the SPA, and vice versa. Such evidence means that it is far more likely that there is functional interchange between the project area and SPA populations (and by extension a potential vector for impacts on the SPA) than not.”*.

The Secretary of State will readily appreciate that the latest comment from Natural England on this important matter is a simple reiteration of previous statements: it therefore does not move us on from the position we commented upon as above. Indeed, it now introduces greater cause for uncertainty as the Secretary of State will note that Natural England have moved from a position where they claimed to be satisfied that there was no functional linkage between stone curlews affected by the proposed development and those underpinning the SPA population, to now stating that they think it is “unlikely” that the study they refer to (but from which they provide no data at all) will change their advice. This suggests, in fact, that NE are recasting their advice to account for the possibility that the study might ultimately present data that contradicts their previous position.

It therefore falls to us to merely repeat the concluding remarks made in our letter of 8th September 2023, that *“Binding case law (the Dutch Nitrogen cases and others) has firmly established that decision makers cannot lawfully consent to development if there remains reasonable scientific doubt over whether it could adversely affect the integrity of a European (Habitats) Site. Decision makers are entitled to place significant weight on the opinion of Natural England, indeed the courts have held that NE’s advice should given such weight, however that does not mean NE’s advice is final or binding. In particular, where the opinion of the statutory authority is absent of supporting scientific evidence, and/or there is otherwise contrary evidence*

¹ R. E. Green, G. A. Tyler, C. G. R. Bowden (2006) *Habitat selection, ranging behaviour and diet of the stone curlew (Burhinus oedicnemus) in southern England*. Journal of Zoology 250 (2) pp161-183.

² In their letter of 10th January 2024, NE cite 4km but again decline to provide any evidence in support of this figure. The point remains undiminished regardless of whether the precise figures 3.2 or 4km.

or cause for reasonable scientific doubt as to its veracity, there is a requirement to exercise precaution. We contend that this is the position the Secretary of State finds themselves in here.”. Once again, this remains the position – indeed the grounds for caution and uncertainty appear to have grown.

We therefore anticipate and share the Secretary of State’s likely frustration that the statutory authority has declined to provide further assistance on this matter in order to inform robust decision-making.

As regards the applicant’s separate submissions on this issue, via Pinsent Masons’ letter of 11th January, these are a simple regurgitation of statements made by NE at Deadline 5, and via NE’s letter of 4 August 2023. They therefore do not assist the SOS in dealing with the ongoing evidence vacuum on this issue.

Best regards



Dominic Woodfield CEcol CEnv MCIEEM
Director



**Wildlife Trust for
Beds, Cambs
& Northants**

Date: 23rd January 2024

Dear Catherine,

Sunnica Examination – Comments on Stone Curlew

Thank you for alerting the Wildlife Trust BCN to the inspector / Secretary of State request for further information from Natural England on Stone Curlew.

I have looked through Natural England's and the Say No to Sunnica Action Group's response to the Examination. The Wildlife Trust was also involved in the Ecological Advisory Group, as an advisor to East Cambridgeshire District Council.

I attended a meeting at which the issue of Stone Curlews, and in particular the adequacy of mitigation measures and the functional connectivity with the Breckland SPA were discussed. There was debate as to whether the population was functionally linked and the evidence was not clear one way or the other. This position does not seem to have changed and the Natural England submission does not provide evidence to demonstrate the population potentially impacted by the Sunnica proposals is not functionally linked to the Breckland population. In such circumstances concerning a SPA and protected species such as Stone Curlew it is clear that a precautionary approach should be taken and the populations should therefore be considered functionally linked.

The Wildlife Trust had serious concerns about the adequacy of the mitigation proposals for Stone Curlew, that were not fully addressed by Sunnica through the Ecological Advisory Group. The last proposals we were shown before the Examination were still not sufficient with significant concerns as to whether they would be effective and whether there was sufficient survey and data to support the impact assessment. This issue has been considered in detail at the Examination, but unless the mitigation proposals were changed during the Examination, we remain concerned as to their adequacy or effectiveness.

Yours sincerely,

[Redacted signature]

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