

SUNNICA ENERGY FARM

EN010106

Volume 8

8.6 The Applicant's Responses to Relevant Representations

Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010



Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010

Sunnica Energy Farm Development Consent Order 2022

The Applicant's Responses to Relevant Representations

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List of abbreviations

A&ROW	Access and Rights of Way	CIEEM	Chartered Institute of Ecology and Environmental Management
AADT	Annual Average Daily Traffic	CIRIA	Construction Industry Research and Information Association
AC	Alternating Current	CLA	Carbon lifecycle analysis
AEGL	Acute Exposure Guideline Level	CLP	Construction Logistic Plan
AEP	Annual Exceedance Probability	CNTC	Cambridge Norwich Tech Corridor
AIL	Abnormal Indivisible Load	COMAH	Control of Major Accident Hazards
ALC	Agricultural Land Classification	COPA	Control of Pollution Act 1974
AOD	Above Ordnance Datum	CRMP	Construction Resource Management Plan
ASA	Alternative Sites Assessment	CTMP	Construction Traffic Management Plan
ATC	Automatic Traffic Count Survey	CWS	County Wildlife Site
BEIS	Department for Business, Energy and Industrial Strategy	DAMS	Detailed Archaeological Mitigation Strategy
BESS	Battery Energy Storage System	DAS	Design and Access Statement
BFSMP	Battery Fire Safety Management Plan	dB	decibels
BGS	British Geological Survey	DC	Direct Current
BMV	Best and Most Versatile	DCLG	Department for Communities and Local Government
BNG	Biodiversity Net Gain	DCO	Development Consent Order
BoR	Book of Reference	dDCO	Draft Development Consent Order
BS	British Standard	DEFRA	Department for Environment, Food and Rural Affairs
BSSS	British Society of Soil Science	DEMP	Decommissioning Environment Management Plan
C&PCCG	Cambridgeshire and Peterborough Clinical Commissioning Group	DMRB	Design Manual for Roads and Bridges
CAVAT	Capital Asset Value for Amenity Trees	DRMP	Decommissioning Resource Management Plan
CC	County Council	EA	Environment Agency
CCC	Cambridgeshire County Council	ECDC	East Cambridgeshire District Council
CCS	Considerate Constructors Scheme	EEAST	East of England Ambulance Service Trust
CCTV	Closed Circuit Television	EIA	Environmental Impact Assessment
CEBR	Centre for Economics and Business Research	ES	Environmental Statement
CEMP	Construction Environmental Management Plan	ESO	Electricity System Operator
		EV	Electric Vehicles

ExA	Examination Authority	LLFA	Lead Local Flood Authority
FES	Future Energy Scenarios	LOAEL	Lowest Observable Adverse Effect Level
FRA	Flood Risk Assessment	LPA	Local Planning Authority
GB	Great Britain	LPA	Local Planning Authority
GHG	Greenhouse Gas	LSG	Local Street Gazetteer
GI	Green Infrastructure	LT	Landscape character type
GS	Grass Sickness	LVIA	Landscape and Visual Impact Assessment
GVA	Gross Value Added	MAFF	Ministry of Agriculture, Fisheries and Food
GWh	Gigawatt hours	MfS	Manual for Streets
HCA	Homes & Communities Agency	MHCLG	Ministry of Housing, Communities and Local Government
HE	Historic England	MOD	Ministry of Defence
HEMP	Historic Environment Management Plan	NCA	National Character Area
HEMS	Helicopter Emergency Medical Service	NE	Natural England
HER	Historic Environment Record	NETS	National Electricity Transmission Network
HF	Hydrogen Fluoride	NFPA	National Fire Protection Association
HGV	Heavy Goods Vehicle	NGESO	National Grid Electricity System Operator
HPUT	Hermes Property Unit Trust	NGET	National Grid Electricity Transmission
HRA	Habitats Regulations Assessment	NGG	National Grid Gas
HUDU	Healthy Urban Development Unit	NH	National Highways
ICC	International Code Council	NMUs	Non Motorised Users
IEMA	The Institute of Environmental Management and Assessment	NNR	National Nature Reserve
IFC	International Fire Code	NPPF	National Planning Policy Framework
kWh	Kilowatt hour	NPS	National Policy Statement
LAeq	Equivalent Continuous Sound Pressure Level	NSIP	Nationally Significant Infrastructure Project
LCA	Landscape Character Areas	NVC	National Vegetation Classification
LEMP	Landscape and Ecology Management Plan	OEMP	Operation Environmental Management Plan
LHA	Local Highways Authorities	OLEMP	Outline Landscape and Ecology Management Plan
LIR	Local Impact Report	OS	Ordnance Survey
LLCA	Local Landscape Character Areas	PA	Planning Act

PAMS	Precautionary Arboricultural Method Statement
PIC	Personal Injury Collision
PINS	Planning Inspectorate
PRoW	Public Right of Way
PSH&EH	West Suffolk Private Sector Housing and Environmental Health
PV	Photovoltaic
R&D	Research and Development
RAC	Reading Agricultural Consultants
RAF	Royal Air Force
RPA	Root Protection Areas
RR	Relevant Representation
RSPB	Royal Society for the Protection of Birds
SAC	Special Area of Conservation
SCC	Suffolk County Council
SEF	Sunnica Energy Farm
SEFEL	Sunnica Energy Farm Examination Library
SMP	Soil Management Plan
SNCBs	Statutory Natures Conservation Bodies
SNEECCG	Suffolk and North East Essex Clinical Commissioning Group
SOAEL	Significant Observed Adverse Effect Level
SoCC	Statement of Community Consultation
SoCG	Statement of Common Ground
SOM	Soil Organic Matter
SoS	Secretary of State
SPA	Special Protection Area
SRN	Strategic Road Network
SSSI	Site of Special Scientific Interest
SSWSI	Site Specific Written Scheme of Investigation
STEM	Science, Technology, Engineering and Mathematics

SuDS	Sustainable Drainage Systems
SWMP	Surface Water Management Plan
TA	Transport Assessment
TP	Travel Plan
TRMs	Traffic Regulation Measures
UK	United Kingdom
WebTAG	Web-based Transport Analysis Guidance
WFD	Water Framework Directive
WSC	West Suffolk Council
WSI	Written Scheme of Investigation
ZTV	Zone of Theoretical Viability

1 Introduction and summary

1.1 Purpose of this document

- 1.1.1 This document provides Sunnica Energy Farm Ltd's (the Applicant's) response to the Relevant Representations (RRs) published by the Planning Inspectorate (PINS) on 05 April 2022, relating to the Development Consent Order Application (the DCO application) for Sunnica Energy Farm (the Scheme).
- 1.1.2 1360 RRs were made in response to the Scheme DCO Application and published on the PINS website on 05 April 2022. An additional 5 RRs were received late and accepted at the discretion of the Examining Authority. As AS-015 (NATS Ltd, Safeguarding Office), AS-016 (The Coal Authority) and RR-0638 (UK Health Security Agency) (subsequently removed from the Relevant Representations Library) made no substantive comments on the Application, the Applicant does not respond to them here.
- 1.1.3 Table 1-1 lists the RRs received from the host local authorities (Suffolk County Council, Cambridgeshire County Council, East Cambridgeshire District Council and West Suffolk Council) and certain statutory bodies (Natural England, Historic England, National Highways and the Environment Agency). These responses are analysed in full in Section 2 of this document and proceed through each representation in a chronological order. The references applied to each comment in this section (e.g. NE-1) are the Applicant's and are for the purpose of assisting with reading the responses.
- 1.1.4 Table 1-2 lists all the other individuals and organisations that submitted RRs alongside the reference allocated to each by PINS within the Relevant Representations Examination Library and/or the Sunnica Energy Farm Examination Library. The Applicant has responded to each of the points raised within the RRs within this document.
- 1.1.5 The remaining responses listed in Table 1-2 have been grouped by topic and are addressed on that basis in Section 3 of this document.
- 1.1.6 References to the Application documentation are provided where necessary according to the reference system set out in the Planning Inspectorate's Sunnica Energy Farm Examination Library.
- 1.1.7 This document is accompanied by the following appendices:
- Appendix A – Supplementary Cumulative Assessment
 - Appendix B – Existing Public Rights of Way by Type

- Appendix C – Figure 1 (A-F) Equine Zone of Theoretical Visibility (ZTV)

1.1.8 Appendix A and Appendix B are appended to this document. Appendix C has been submitted separately and is available to review alongside this document.

Table 1-1 List of organisations whose Relevant Representations are responded to in Section 2

PINS reference	Acronym	Relevant Representation received from
RR-1340	SCC	Suffolk County Council
RR-1178	CCC	Cambridgeshire County Council
RR-0998	ECDC	East Cambridgeshire District Council
RR-1351	WSC	West Suffolk Council
RR-1208	EA	Environment Agency
RR-1226	HE	Historic England
AS-014 (Additional Submission)	NH	National Highways
RR-1291	NE	Natural England

Table 1-2 Remaining Relevant Representations (as summarised in the Examination library published by the Planning Inspectorate)

PINS reference	Interested Party				
RR-0001	Andrew Younger	RR-0009	Dale Hing	RR-0018	John James
RR-0002	Anthony George Bowser	RR-0010	Derek Kuziw	RR-0019	John Reali
RR-0003	Anthony Hagen	RR-0011	Effie Brooks	RR-0020	John Sheedy
RR-0004	Ben Holland	RR-0012	Fred Handscombe	RR-0021	Julian Flood
RR-0005	Chris Davison	RR-0013	Garreth Evans	RR-0022	Lark Angling and Preservation
RR-0006	Clare Byrne	RR-0014	Gemma Shaw	RR-0023	Lea Dodds
RR-0007	Coral Fuller	RR-0015	Geoffrey Dabrowa	RR-0024	Nicole Langstaff
RR-0008	D.J.T. Taylor	RR-0016	Jemma Sheedy	RR-0025	Olivia Davison
		RR-0017	Joanne Cant	RR-0026	Pete Burgess

RR-0027	Rupert Osborn
RR-0028	Ryan Bell
RR-0029	Samantha Bell
RR-0030	Simon Trett
RR-0031	Thomas Davison
RR-0032	Tracy Colbert
RR-0033	Trevor Layn
RR-0034	Andrew James Cornell
RR-0035	Emma Sharp
RR-0036	Genevra Champion
RR-0037	Kevin Hempson
RR-0038	Leslie Wightman
RR-0039	Margaret Cornell
RR-0040	Mrs GJ Preece
RR-0041	Richard Lowe
RR-0042	Vanessa Kovacevic
RR-0043	Alexandra Hunt
RR-0044	Donald MacBean
RR-0045	Emily Fishpool
RR-0046	Fahmy Fayez Fahmy
RR-0047	Lisa Hagen
RR-0048	Liz Reed
RR-0049	Mark Alford
RR-0050	Mark Hawley
RR-0051	Michaela Wick
RR-0052	Olivia Pitts
RR-0053	Orsolya Dianovics-Burns
RR-0054	Richard Smith

RR-0055	Sally Hempson
RR-0056	Sally Hughes
RR-0057	Steven Gladwin
RR-0058	Alasdair John Macrae
RR-0059	Anthony Speed
RR-0060	Berbank Green
RR-0061	Campbell Victor Pearson
RR-0062	Cecelia Hawley
RR-0063	Chris Carnaghan
RR-0064	Chris Lee-McCloud
RR-0065	David Peachey
RR-0066	Dinah Dorling
RR-0067	Doreen Carrington
RR-0068	Esmee Bloomfield
RR-0069	H Carrington
RR-0070	Heidi Phillips Klemp
RR-0071	Hilary Durrant
RR-0072	Jacqueline Burke
RR-0073	Jan Stewart
RR-0074	Jon Burns
RR-0075	Josie Skillen
RR-0076	Kieran Coffey
RR-0077	Leila Hindmarsh
RR-0078	Linda Homan
RR-0079	Margaret Gaylor
RR-0080	Michael Adams
RR-0081	Michael Relac
RR-0082	Michael Wallis

RR-0083	Mrs G Thompson
RR-0084	Nicola Di Miscio
RR-0085	Nikki Lushington
RR-0086	Patrick Maguire
RR-0087	Pete O'Riordan
RR-0088	Philip Frost
RR-0089	Polly Smith
RR-0090	Roger Billings
RR-0091	Roger Osborn
RR-0092	Rosalind Hamill
RR-0093	Wicken Parish Council
RR-0094	Andrew Chapman
RR-0095	Caroline Parker
RR-0096	Chris Bartram
RR-0097	Christopher Corbin
RR-0098	Dara Gladwin
RR-0099	Elizabeth Sivyer
RR-0100	Janet Clarke
RR-0101	Joseph Pattison
RR-0102	Lesley Osborne
RR-0103	Linda Trundley
RR-0104	Mr Ray Course
RR-0105	Neal Entwistle
RR-0106	Richard Radcliffe
RR-0107	Roy Clarke
RR-0108	Sandra Dwan
RR-0109	Alan Borderick
RR-0110	David Marchant

RR-0111	Geraldine Ciantar
RR-0112	Josie Jennings
RR-0113	Matt Hancock MP
RR-0114	Sarah Hill
RR-0115	Sue Shepherd
RR-0116	Amanda Tanner
RR-0117	Ed Lockwood
RR-0118	James Moody
RR-0119	Lewis Jackson
RR-0120	Michael John Pollard
RR-0121	Nicholas Harvey
RR-0122	Samantha Crick
RR-0123	Sarah Pike
RR-0124	Steven Purser
RR-0125	Andrew Beardon
RR-0126	Barry Botwright
RR-0127	Catherine Ann Wheeler
RR-0128	Emily Wilcox
RR-0129	Mr Joseph Pattison on behalf of Margaret Coates
RR-0130	Michael Taylor
RR-0131	Sue Winter
RR-0132	Alan Waterfield
RR-0133	Geoffrey Bennett
RR-0134	Richard David Liddington
RR-0135	The Ark Church Isleham
RR-0136	Jen McTrusty
RR-0137	Mike Starnes

RR-0138	Mr Alan B. Smith
RR-0139	Heath Rosselli Campbell
RR-0140	Pam Dowson
RR-0141	Hamelin Brands Ltd
RR-0142	Helen Faulkner
RR-0143	Jackie Seddon
RR-0144	Palace Green Homes
RR-0145	Simon Cock
RR-0146	Terry Malkin
RR-0147	Vida Whiteley
RR-0148	Patricia Judd
RR-0149	Steve Wilson
RR-0150	Reach Parish Council
RR-0151	Andy Gillett
RR-0152	Bob Brotchie
RR-0153	Hazel Barber
RR-0154	Lance Stanbury
RR-0155	Paul Simeon Ryan
RR-0156	Amy Rayment
RR-0157	Amy Thomas
RR-0158	Carole Thomas
RR-0159	Colin Bernard Ister
RR-0160	Esther McVee
RR-0161	Lucinda Wright
RR-0162	Oliver Thomas
RR-0163	Stephen Wilson
RR-0164	André Ciantar
RR-0165	Emma Ryan

RR-0166	Hayley Fisher
RR-0167	Jessica Ciantar
RR-0168	Jim Wallace
RR-0169	Joanna Frost
RR-0170	John Bridges
RR-0171	Karen Robinson
RR-0172	Lesley Wilson
RR-0173	Marie Beaumont
RR-0174	Marie MacBean
RR-0175	Natasha Jones
RR-0176	Nicholas Bennett
RR-0177	Peter Gidlow
RR-0178	Peter Thorne
RR-0179	Pierre Nortje
RR-0180	Rev James Hurst
RR-0181	Robert J M Bright
RR-0182	Vanessa Couch
RR-0183	Andrew Dickson
RR-0184	Darren Hughes
RR-0185	Fergus McCoig
RR-0186	Gary Timmins
RR-0187	Ian Maclaren
RR-0188	Ian Threlfall
RR-0189	Isleham Parish Council
RR-0190	Jeffrey Bryan Sadler
RR-0191	Jeremy Richardson
RR-0192	John Ryan
RR-0193	Karin Dobbie

RR-0194	Lorraine Stone
RR-0195	Michael Stanley P Stone
RR-0196	Mr Christopher Mason
RR-0197	Neil Gibson
RR-0198	Ricky Cornish
RR-0199	Russell Leaman
RR-0200	Sean Gilgunn
RR-0201	Tom Gallop
RR-0202	Brian Challis
RR-0203	Dr Harry Sidebottom
RR-0204	Julia Theophilus
RR-0205	Kevin Wright
RR-0206	Mark Fletcher
RR-0207	Mark Goldsack
RR-0208	Richard Furlonger
RR-0209	Veronica Turner
RR-0210	Anglian Learning
RR-0211	The Hemp Store on behalf of Ann Thornalley
RR-0212	Jenny Moss
RR-0213	Margaret A Lowe
RR-0214	Pamela Wilson
RR-0215	Rosalyn Bartlett
RR-0216	Simon Foreman
RR-0217	Annabel Freestone
RR-0218	Frances Sidebottom
RR-0219	Jill Worth
RR-0220	Julia O'Dwyer

RR-0221	Linda Porter-Cohen
RR-0222	Lisa Sidebottom
RR-0223	Matt Stannard
RR-0224	Paul Pickles
RR-0225	Ryan Collen
RR-0226	Samantha Munro
RR-0227	Tony Paxman
RR-0228	West Row Parish Council
RR-0229	William O'Dwyer
RR-0230	Alan Wright
RR-0231	Burwell Parish Council Climate Forum
RR-0232	Catherine Gibson
RR-0233	Catherine Gurnham
RR-0234	Chrissie Sadler
RR-0235	Christopher Sadler
RR-0236	Dan Mules
RR-0237	Karen Burgess
RR-0238	Nicola Espley
RR-0239	Nigel Cooper
RR-0240	William Frost
RR-0241	George G Rusk
RR-0242	Mrs Phyllis Rusk
RR-0243	Jonathan Pearce
RR-0244	Mr Matthew Hedley
RR-0245	Patrick Cross
RR-0246	Samantha Spillane
RR-0247	Sandra Judkins

RR-0248	Tim Wood
RR-0249	Adam
RR-0250	Callum Orford
RR-0251	Claire Mills
RR-0252	Cllr Brian Peter Harvey
RR-0253	Hannah Patten
RR-0254	Jennifer Hall
RR-0255	Jill Collins
RR-0256	John Robert Savage
RR-0257	John Tapster
RR-0258	Margaret Thompson
RR-0259	Norman Ferguson
RR-0260	Russell Milne
RR-0261	Timothy James Lawson
RR-0262	Joanne Elmer
RR-0263	John Newstead
RR-0264	Julie Thornalley
RR-0265	Michael Bullions
RR-0266	Robert Neil Brown
RR-0267	Sam Lee-Mccloud
RR-0268	Shirley Bullions
RR-0269	Angela Wells
RR-0270	Brian Barrow
RR-0271	C knight
RR-0272	Cheryl Caves
RR-0273	David Ellis
RR-0274	Evelyn Graham
RR-0275	Graham Gordon

RR-0276	Julie Smith
RR-0277	Paul Butcher
RR-0278	Ramblers, Newmarket & District Group
RR-0279	Amanda Manchett
RR-0280	Benoit Herinckx
RR-0281	Ian Rees
RR-0282	Jack Leitch
RR-0283	Jen Waterfield
RR-0284	Jenna Clark
RR-0285	Jillian Gamlin
RR-0286	Shannon Elizabeth Manchett
RR-0287	Susan Chapman
RR-0288	Tim Slater
RR-0289	William Holt
RR-0290	George Gibson
RR-0291	Lina Boyd-Rochfort
RR-0292	Sally lewis
RR-0293	Sarah Ganiford
RR-0294	Albert Edward Mills
RR-0295	Birgitta Gaston on behalf of Betty Duncan
RR-0296	Birgitta Gaston
RR-0297	Bridgette Scott
RR-0298	Caroline Prince
RR-0299	Christina Engelbrecht
RR-0300	Christopher William Henson
RR-0301	Clare James

RR-0302	Douglas John Longmuir
RR-0303	Eleanor Scott
RR-0304	Gail Baker
RR-0305	Grahame Radford
RR-0306	James Fellowes
RR-0307	Julian Scott
RR-0308	Kelvin Morgan
RR-0309	Lesley Coltham
RR-0310	Malcolm Watkinson
RR-0311	Rosemary Hendrick
RR-0312	Sarah Fellowes
RR-0313	Terry Wood
RR-0314	Tim Jones
RR-0315	Andrew Farr
RR-0316	Ben Sale
RR-0317	Christine Shaw
RR-0318	Dr Mark Hows
RR-0319	Dr Stephen Taylor
RR-0320	James Toller
RR-0321	John Bavister
RR-0322	John Bruton
RR-0323	Kiriaki Soultana
RR-0324	Lady Frances Peyton Hospital Almshouse Charity
RR-0325	Leonard Cooper
RR-0326	Mark Geddie
RR-0327	Mrs Carey Beckett
RR-0328	Nicholas Webb

RR-0329	Nick George
RR-0330	Nicola Farr
RR-0331	Oliver Rubinstein
RR-0332	Peter Ingram
RR-0333	Sarah Hurst
RR-0334	Sinead Bruton
RR-0335	The Pines Primary School
RR-0336	Andrew Hardy
RR-0337	Catherine Looper
RR-0338	Chris Hall
RR-0339	D R Kerr
RR-0340	Deborah Blackwell
RR-0341	Dr Charles Moseley
RR-0342	Ed Lubbock
RR-0343	Hugh Murray
RR-0344	James Woolf
RR-0345	Joanna Winning
RR-0346	John Duncan Waller
RR-0347	Kerensa Klottrup-Rees
RR-0348	M Kerr
RR-0349	Michael Swan
RR-0350	Michelle A Ferris
RR-0351	Mollie Kerr
RR-0352	Mr Kevin Wardell
RR-0353	Mrs Christina Wardell
RR-0354	Mrs Malkin
RR-0355	Ronan Kerr

RR-0356	Royal Worlington & Newmarket Golf Club
RR-0357	Sara Phipps
RR-0358	Scott Virgo
RR-0359	S��verine Leclair
RR-0360	Steven Hamblyn
RR-0361	Yeru Shang
RR-0362	Alan T Richardson
RR-0363	Albane Colleau
RR-0364	Alexander Czernin
RR-0365	Audrey Czernin
RR-0366	Brian Penny
RR-0367	Caroline Toller
RR-0368	Chris Hall
RR-0369	Christian Griffin
RR-0370	Christopher Reeks
RR-0371	David Clarke
RR-0372	Delyse Ray
RR-0373	Joanne Ward on behalf of Edmond Ward
RR-0374	Elaine Twigg
RR-0375	Grace Hale
RR-0376	Hilary Binks
RR-0377	Ian Fulcher
RR-0378	Jack Reeks
RR-0379	Janise Cook
RR-0380	Jennie Simcock
RR-0381	Joanne Ward

RR-0382	John Fleet
RR-0383	Jonathan Keith Lomas
RR-0384	Julian Bryers
RR-0385	Julie Hobbs
RR-0386	Lucinda Wright
RR-0387	Malcolm Avis
RR-0388	Michael Andrew Clark
RR-0389	Mrs Cheryl Bampton
RR-0390	Mrs Jennifer White
RR-0391	Sara Beckett
RR-0392	Sean McGinty
RR-0393	Alan Warwick
RR-0394	Anne Low
RR-0395	David Robertson
RR-0396	Glenda Preece on behalf of Diane Bovingdon
RR-0397	Edward Dunlop
RR-0398	Francesca Queniart
RR-0399	Georgina Long
RR-0400	Janet Griffiths
RR-0401	Joanna Mason
RR-0402	Michael Bell
RR-0403	Mrs Jeanne Winter
RR-0404	Glenda Preece on behalf of Pauline Wilkes
RR-0405	Rebecca Dunlop
RR-0406	Susan Lemmon
RR-0407	Anne Shneerson

RR-0408	Carolyn
RR-0409	Deborah Saward Arav
RR-0410	Dr Paul Silverston
RR-0411	Emma Head
RR-0412	Graham Raymond Bradbeer
RR-0413	Ian Hawkes
RR-0414	Jill Coleman
RR-0415	John Collyer
RR-0416	John Shneerson
RR-0417	Louise Andreasen
RR-0418	Martin Hopkins
RR-0419	Martin Swaffer
RR-0420	Michelle Collen
RR-0421	Mitch Doyle
RR-0422	Nicholas Driver
RR-0423	Phyllis Daly
RR-0424	Evelyn Graham on behalf of Raymond Graham
RR-0425	Robert Dorman
RR-0426	Roger Varian
RR-0427	Sandra Murphy
RR-0428	Susan Swaffer
RR-0429	Alan Bampton
RR-0430	Carol C Cooper
RR-0431	Catherine Grassin
RR-0432	Charles Pilgrim
RR-0433	Clare MacGillivray
RR-0434	David Watson

RR-0435	Frank Marshall
RR-0436	Glenn French
RR-0437	Graham Barry Houghton
RR-0438	J Dunand
RR-0439	Liam MacGillivray
RR-0440	Martin Morgan
RR-0441	Mehmet Ahmet
RR-0442	Moirra Newell
RR-0443	Mrs Judi Thurlow
RR-0444	Nikoletta Keri
RR-0445	Patricia Ann Houghton
RR-0446	Peter Thurlow
RR-0447	Phillip Cross
RR-0448	Sandra Jager
RR-0449	Sean Newell
RR-0450	Suzanne Royston
RR-0451	Alison Young
RR-0452	Andrew Northfield
RR-0453	Ann Holton
RR-0454	Bryan Oliver
RR-0455	Carol Elizabeth Denson
RR-0456	Charlotte MacTulloch-Gair
RR-0457	Chris Royston
RR-0458	Clare Cambridge
RR-0459	Colleen Alexande
RR-0460	David Holton
RR-0461	Debbie Davies
RR-0462	Deborah Harden

RR-0463	Dr Colin Groom
RR-0464	Dr Henrietta Deasy
RR-0465	Geoff Crowley
RR-0466	Grant Harden
RR-0467	Rachel Howe
RR-0468	Terence Walter Chinery
RR-0469	A Scripls
RR-0470	Ali Aston
RR-0471	Mr Christopher Mason on behalf of Angeles Hornero del Castillo
RR-0472	Anne Lister
RR-0473	Bob Humphrey
RR-0474	Catherine Barrow
RR-0475	Claire Bishop
RR-0476	Darren McVee
RR-0477	Karen Goodman on behalf of David Goodman
RR-0478	David Sandison
RR-0479	James Ferguson
RR-0480	James Smith
RR-0481	Kay Blackwell
RR-0482	Kevin Hiskey
RR-0483	Laura Dunling
RR-0484	Linda Davill
RR-0485	Mark Smith
RR-0486	Matthew Dunling
RR-0487	Michael Highland

RR-0488	Mr Nick Osborne
RR-0489	Mrs Joan Willsmer
RR-0490	Pauline Jennings
RR-0491	Catherine Judkins on behalf of Peter Flat
RR-0492	Raymond A Shipp
RR-0493	Richard John Fridd
RR-0494	Sam Bullard
RR-0495	Sophie Sandison
RR-0496	The Isleham Society
RR-0497	Victoria Bullard
RR-0498	Yvette Smith
RR-0499	Alan Kinninmonth
RR-0500	Anne Mitchell
RR-0501	Bruce Knight
RR-0502	Camilla Vaughan
RR-0503	Dawn Smith
RR-0504	Duncan Maxwell
RR-0505	Elizabeth Hollop
RR-0506	Fiona C Peachey
RR-0507	Annette Flindall on behalf of Gerald Brian Flindall
RR-0508	Helen Timmins
RR-0509	Julia Barnes
RR-0510	Julie Aldous
RR-0511	Malcolm Goodridge
RR-0512	Marco Botti Ltd
RR-0513	Maxine Simpson

RR-0514	Michael Denson
RR-0515	Mr. Roger Durrant
RR-0516	Patricia Audus
RR-0517	Peter Victor McCalmont
RR-0518	Philip Peachey
RR-0519	Ruth Wills
RR-0520	Sarah Gardella
RR-0521	Susan Nuttall
RR-0522	William Haggas
RR-0523	Zoe Sarah Crowley
RR-0524	Anthony Balladares
RR-0525	Antony Vornell
RR-0526	Arthur Rivett
RR-0527	Christine Butcher
RR-0528	Deborah Fletcher
RR-0529	Debra N. Harley
RR-0530	Ed Mayall
RR-0531	Edward Marriott
RR-0532	Fordham (Cams) Walking Group
RR-0533	Frances Stanley
RR-0534	Geoffrey Mitchell
RR-0535	Heather Dawn Palfrey
RR-0536	Henry Marriott
RR-0537	Jackie Badcock
RR-0538	Jane Marriott
RR-0539	John Alexander Leitch
RR-0540	John Berrett

RR-0541	John Butcher
RR-0542	John Fry
RR-0543	Jon Ray
RR-0544	Julia Sizer
RR-0545	Karen Balladares
RR-0546	Kate James
RR-0547	Lynda Brereton
RR-0548	Mrs Brenda Knowles
RR-0549	Mrs J M Naylor
RR-0550	Peter Knowles
RR-0551	Philippa Wiggin
RR-0552	Robert Horton
RR-0553	Robert Owens
RR-0554	Danni Dykes on behalf of Sir Michael Stoute
RR-0555	Chippenham Parish Council on behalf of Sue Blazey
RR-0556	Susan Evans-Smith
RR-0557	The National Horseracing Museum
RR-0558	Tina Abbott
RR-0559	Tom Clover
RR-0560	Tom Clover Racing
RR-0561	William Jarvis
RR-0562	Andrew Hopkins
RR-0563	Angela Taylor
RR-0564	Ann Traher
RR-0565	Chris James Cooke

RR-0566	Chris Traher
RR-0567	East Cambridgeshire Climate Aciton Network
RR-0568	Elizabeth Mary Garget
RR-0569	Ellie Smith
RR-0570	Emily Radcliffe
RR-0571	Ethan Lewis
RR-0572	Fergus Wright
RR-0573	Ashtons Legal on behalf of Godolphin Management Company Limited
RR-0574	Harry Eustace
RR-0575	Lyndsey Rolfe
RR-0576	Marilyn Julia Badger
RR-0577	Mehreen Qayum-Millard
RR-0578	Moulton Parish Council
RR-0579	Mr L Cook
RR-0580	Mr Malcolm A Pendery
RR-0581	Mrs Hazel Fleet
RR-0582	Paul Fishpool
RR-0583	Penelope McCalmont
RR-0584	Roland Sore
RR-0585	Rowland Barry John Domvile
RR-0586	Sarah Kohl
RR-0587	Selina Boyce
RR-0588	Susanne Kohl
RR-0589	Susie Wilson
RR-0590	Amanda Brudenell

RR-0591	Amanda Prior
RR-0592	Anita A Howroyd
RR-0593	Anne Noble
RR-0594	Burwell Parish Council
RR-0595	Celia Clarke
RR-0596	Christian Wall
RR-0597	David Campbell Rankin
RR-0598	David Roitman
RR-0599	Dr Alastair Burn
RR-0600	Elizabeth Coupe
RR-0601	Elizabeth Jane Orde-Powlett
RR-0602	Frances Mary Taylor
RR-0603	Friends of Isleham Nature Reserves
RR-0604	Gavin Hunter
RR-0605	Gay Jarvis
RR-0606	Greenvale
RR-0607	Isabel Cross
RR-0608	Jackie Clover
RR-0609	James Moore
RR-0610	Jane Constable
RR-0611	Jane George
RR-0612	Jane Laing
RR-0613	Jane Saul
RR-0614	John Gosden Ltd
RR-0615	John Morrey
RR-0616	John Wick
RR-0617	Mark Takacs

RR-0618	Matt Hankins
RR-0619	Matthew Bowler
RR-0620	Michael Church
RR-0621	Michael Gee
RR-0622	Mr Giuseppe Piletto
RR-0623	Mrs Grace Piletto
RR-0624	Mrs Linda Breeze
RR-0625	Patrick Christopher Orde-Powlett
RR-0626	Peter Rolfe
RR-0627	Rachel Bowlin
RR-0628	Rachel Hood
RR-0629	Reece Pungla
RR-0630	Richard Dolan
RR-0631	Richard Payne
RR-0632	Robin Benson
RR-0633	Roy Lerner
RR-0634	Sharon Parsonson
RR-0635	Sheena Petts
RR-0636	Stephen Humphries
RR-0637	Theodora Gould
RR-0638	UK Health Security Agency (formerly Public Health England)
RR-0639	Ajay Visana
RR-0640	Alice Keutgen
RR-0641	Chris Heap
RR-0642	Claude Porcheron

RR-0643	Conor Bignell
RR-0644	Daniel Hopla
RR-0645	Dean Warwick
RR-0646	Deirdre Hyde
RR-0647	Derek Robertson
RR-0648	Dr Edmund John Fordham
RR-0649	Emma Thomas
RR-0650	Ian Braybrooke
RR-0651	Jack Smith
RR-0652	Jacqui Sayers
RR-0653	Jamie Monument
RR-0654	Jane Harrington
RR-0655	Jean Cornwell
RR-0656	Jen Wallis
RR-0657	John Semmelmann
RR-0658	Lesley Gross
RR-0659	Marie Shortland
RR-0660	Michael Lambourn-Brown
RR-0661	Sean McGinty on behalf of Mrs J McGinty
RR-0662	Nicolette Porcheron
RR-0663	Paul Tuli
RR-0664	Peter Browne
RR-0665	Philip Baker
RR-0666	Rosa De Simone
RR-0667	Sally Lambourn-Brown
RR-0668	Sam Carter
RR-0669	Sarah Lawrence

RR-0670	Suzanne Morse
RR-0671	Teresa Peachey
RR-0672	Zsanett Moricz
RR-0673	Adam Singleton
RR-0674	Alan Burge
RR-0675	Alison Oliver
RR-0676	Andrew Laird
RR-0677	Archie Stewart
RR-0678	Brenda Downey
RR-0679	British Transport Police
RR-0680	Catherine Swan
RR-0681	Chris Binks
RR-0682	Christine Savage-Hamlin
RR-0683	Claire Tilbrook
RR-0684	Colin Eddison
RR-0685	Daniel Cant
RR-0686	David Andrew Clegg
RR-0687	Dean Alford
RR-0688	Dena Thompson
RR-0689	Diana Jones
RR-0690	Diane Fuller
RR-0691	Lesley Burge on behalf of Doreen Bettell
RR-0692	Dr Karen Chaudhry
RR-0693	Fiona Ferguson
RR-0694	G Halliwell
RR-0695	GDPR Protected 001
RR-0696	Graham Hopkins

RR-0697	Ian Hawkins
RR-0698	Ivy Elaine Attree
RR-0699	Jane Grant
RR-0700	Janette Dart
RR-0701	Jennifer Hawkins
RR-0702	Joanne Griffiths
RR-0703	Jon Jennings
RR-0704	Julia Huffer
RR-0705	Julie Fisher
RR-0706	Karin
RR-0707	Lesley Burge
RR-0708	Linda Coote
RR-0709	Maddie MacKenzie
RR-0710	Mark Wiggin
RR-0711	Mark Wilson
RR-0712	Meg Clarke
RR-0713	Michael Irons
RR-0714	Michael Keith Timmins
RR-0715	Mr Stephen Parker
RR-0716	Mrs Elisa Smith
RR-0717	Mrs Heather Tilbrook
RR-0718	Mrs Jeanette Borderick
RR-0719	Pamela King
RR-0720	Pamela Timmins
RR-0721	Paul Brooks
RR-0722	Peter Doe
RR-0723	Priscilla McDonagh
RR-0724	Rebecca Humphrey

RR-0725	Richard Flynn
RR-0726	Richard Saul
RR-0727	Robin Grant
RR-0728	Rosemarie Barnes
RR-0729	Sean Healy
RR-0730	Shaun Doherty
RR-0731	Sheila Dilley
RR-0732	Stefan Williams
RR-0733	Stephanie Mayall
RR-0734	Susie McKeever
RR-0735	The Newmarket Stud Farmers Association
RR-0736	Tim French
RR-0737	Trevor Reeve
RR-0738	Alexa Strater
RR-0739	Alfred Owen
RR-0740	Alison Wilson
RR-0741	Amanda Black
RR-0742	Andrew Boyce
RR-0743	Andrew Hindmarsh
RR-0744	Andrew MacKenzie
RR-0745	Andrew Mead
RR-0746	Andrew Munro
RR-0747	Anne Owen
RR-0748	Antony Page
RR-0749	Archie Wright
RR-0750	Bob Cheyne
RR-0751	British Horse Society

RR-0752	Carol Challinor
RR-0753	Caroline Odonoghue
RR-0754	Catherine Goff
RR-0755	Catherine Jones
RR-0756	Catherine Meleuc
RR-0757	Andrew Douch on behalf of The Charity of Katharine Shore (Registered Charity 212795)
RR-0758	Chris Rogers
RR-0759	Christian Black
RR-0760	Crystal Dalton
RR-0761	Daisy Ussher
RR-0762	Dave Grimwade
RR-0763	David Reed
RR-0764	Denis Field
RR-0765	Derek McLean
RR-0766	Diane Grano
RR-0767	Dojima Sake Brewery
RR-0768	Dr Michael Sullivan
RR-0769	Elizabeth Grimwade
RR-0770	Emma Anderson
RR-0771	Eric Bishop
RR-0772	Erin Holland
RR-0773	Evelien Clifford
RR-0774	Fordham Parish Council
RR-0775	Freckenham Parish Council
RR-0776	Gainsborough Thoroughbreds Ltd

RR-0777	Geoffrey Cyril Jones
RR-0778	Geoffrey Hugh Calver
RR-0779	Gillian Miller
RR-0780	Hannah Murphy
RR-0781	Heather Davis
RR-0782	Hugh Anderson
RR-0783	Hugo Upton
RR-0784	Jacqueline Fanshawe
RR-0785	James Hall
RR-0786	Jo Clegg
RR-0787	John Dimmock
RR-0788	John O'Kelly
RR-0789	Julie Cole
RR-0790	Julie Reeve
RR-0791	Kevin Needham
RR-0792	Kevin Pallant
RR-0793	Leah Biamonti
RR-0794	Leonie Gartner
RR-0795	Catherine Judkins on behalf of Linda Dunbavin
RR-0796	Lloyd Southgate
RR-0797	Lucy Frazer MP
RR-0798	Lynn Churchman
RR-0799	Marie Bowker
RR-0800	Marie Peachey
RR-0801	Melanie Thielker
RR-0802	Michael Custance
RR-0803	Miss K J Murphy

RR-0804	Mr Danny Smith
RR-0805	Noriko Tomioka
RR-0806	Penny Wright
RR-0807	Philip Rampley
RR-0808	Rebecca Brunton
RR-0809	Robbie Holland
RR-0810	Robert Thomas Alexander Goff
RR-0811	Robin Upton
RR-0812	Roger Skilton
RR-0813	Rowley Arthur Fenwick
RR-0814	Sara Cumani
RR-0815	Sarah Moss
RR-0816	Sarah Whiteside
RR-0817	Shari Khan
RR-0818	Shona Currie
RR-0819	Simon Stafford
RR-0820	Sonia Walsh
RR-0821	Stuart Noble
RR-0822	Susan French
RR-0823	Susan Houlder
RR-0824	Tara Mcdonagh
RR-0825	The Jockey Club
RR-0826	Wendy Mackenzie
RR-0827	William Field
RR-0828	Adrian Beaumont
RR-0829	Adrian Macdonald
RR-0830	Adrian Pratt

RR-0831	Alastair Game
RR-0832	Alexander Nicholas Cheyne
RR-0833	Alexander Wright
RR-0834	Anabela Pinto
RR-0835	Andrew Douch
RR-0836	Andrew Geddes
RR-0837	Anna Gallop
RR-0838	Brenda Lester
RR-0839	C L Cleere
RR-0840	C Le Grand
RR-0841	Carole Wall
RR-0842	Caroline Smith
RR-0843	Carrie Harris
RR-0844	Christina Lewis
RR-0845	Christopher Sell
RR-0846	Claire Leighton
RR-0847	Claire O'Neill
RR-0848	Colin Heap
RR-0849	Cortney Hurlock
RR-0850	Darren Elston VR
RR-0851	Dorothy Wood
RR-0852	E Pooley
RR-0853	Elizabeth Brunton
RR-0854	Ellen Clowes
RR-0855	Emma Raistrick
RR-0856	Kit Longstaff on behalf of Fairhaven Estate
RR-0857	Fiona McIntyre

RR-0858	Frances Bycroft
RR-0859	G. C. Moss
RR-0860	Gary Tucker
RR-0861	GDPR Protected 002
RR-0862	George Dumphreys
RR-0863	Georgina Precious
RR-0864	Gerald Baggs
RR-0865	Glynn East
RR-0866	Graham Waterhouse
RR-0867	Heather Bowers
RR-0868	Heather East
RR-0869	Helen Denness
RR-0870	Huw Neal
RR-0871	Ian Garget
RR-0872	Jackie Delf
RR-0873	James Thorp
RR-0874	Jane Chapple-Hyam
RR-0875	Jane Mackenzie
RR-0876	Jane Williams
RR-0877	Jay Greenfield
RR-0878	Jean Hurlock
RR-0879	Jeremy Lee
RR-0880	Jo Jones
RR-0881	Joanna Reeks
RR-0882	Julie Sheldrick
RR-0883	Justin Dowley
RR-0884	Katy Wallace
RR-0885	Kayleigh Baynes

RR-0886	Kirsty Radwan
RR-0887	La Hogue Farm Foods
RR-0888	Lanwades and St Simon Studs
RR-0889	Laura Gurnham
RR-0890	Lincoln Swann
RR-0891	Mailin Bradley
RR-0892	Margaret Stevens
RR-0893	Maria Prus
RR-0894	Mark Barringer
RR-0895	Mark Caswell
RR-0896	Martin Savage
RR-0897	Mary Stack
RR-0898	Mary Talbot
RR-0899	Matthew Prior
RR-0900	Maureen Stringer
RR-0901	Michael King
RR-0902	Michael Spooner
RR-0903	Michele Wilkinson
RR-0904	Mildenhall High Town Council
RR-0905	Monique Macdonald
RR-0906	Mrs Jane Busuttil
RR-0907	Mrs Jean Faulkner
RR-0908	Mrs Sandra Shipp
RR-0909	Neil Deasy
RR-0910	Nick Airey
RR-0911	Nicole Tweed
RR-0912	Nikki O'Callaghan

RR-0913	Oliver Deasy
RR-0914	Patricia Ivy Judd
RR-0915	Patricia Shipp
RR-0916	Paula Rae
RR-0917	Peter Stanley
RR-0918	Peter Thomson
RR-0919	Philippa Dodds
RR-0920	Phoebe Brown
RR-0921	Richard Hurlock
RR-0922	Robert Palmer
RR-0923	Sandra Rogowski
RR-0924	Sara Caswell
RR-0925	Shane Horan
RR-0926	Simon Talbott
RR-0927	Sir Edward Cazalet
RR-0928	Sophie James
RR-0929	Stephanie Parker
RR-0930	Steven Braybrooke Clarke
RR-0931	Steven Mackenzie
RR-0932	Stuart Armstrong
RR-0933	Sue Brown
RR-0934	Suffolk Preservation Society
RR-0935	Tamas Beata
RR-0936	Isabel Cross on behalf of Terence Cross
RR-0937	Timothy John Washtell
RR-0938	Tina Dumphreys
RR-0939	Toni Clarke (Mrs)

RR-0940	Tonie Jakes
RR-0941	Tracey Minshull
RR-0942	Victor Le Grand
RR-0943	Virginia Moggridge
RR-0944	Worlington Parish Council
RR-0945	Yvonne Hawkins
RR-0946	Aiden Higgins
RR-0947	Alan Scott
RR-0948	Alison Saich
RR-0949	Amanda Watts
RR-0950	Amy Sugg
RR-0951	Andrew Whitaker
RR-0952	Angela Bishop
RR-0953	Anita Lynch
RR-0954	Avril Norman
RR-0955	B Addison
RR-0956	Barbara Murfitt
RR-0957	Barbie Hurrell
RR-0958	Barry Rutterford
RR-0959	BBA Shipping & Transport Ltd
RR-0960	Beatrice Milanesio
RR-0961	Ben James
RR-0962	Maureen Cross on behalf of Brian A Cross
RR-0963	Carbon Neutral Cambridge
RR-0964	Carol Sennitt
RR-0965	Carole Suarez Betts
RR-0966	Caroline Duncan

RR-0967	Caroline Lake
RR-0968	Catherine Cox
RR-0969	Cathy Lecheheb
RR-0970	Charlotte
RR-0971	Charlotte Jacob
RR-0972	Chippenham Parish Council
RR-0973	Chris Ashcroft
RR-0974	Christine Armstrong
RR-0975	Christine Savage
RR-0976	Christoph Widmer
RR-0977	Alison Oakes on behalf of Colin Brotherton
RR-0978	Colin Day
RR-0979	Colin S Bailey
RR-0980	Colin Smith
RR-0981	Connie Thompson
RR-0982	CPRE Cambridgeshire & Peterborough
RR-0983	Craig Bolton
RR-0984	Craig Woollard
RR-0985	Cris Reynolds
RR-0986	D Francis
RR-0987	Daniel
RR-0988	Daniel Wilson
RR-0989	Daryl Trundley
RR-0990	David Baynes
RR-0991	David Byrne
RR-0992	David Crighton

RR-0993	Dawn Young
RR-0994	Dianne Farthing
RR-0995	Discover Newmarket
RR-0996	Dominic Bowers
RR-0997	Doreen Loftus
RR-0999	Edmond Mahony
RR-1000	Elly Sallingboe
RR-1001	Emma Rixon
RR-1002	Felix Newport-Mangell
RR-1003	Fiona Andrews
RR-1004	Gary Maggott
RR-1005	Gavin Davies
RR-1006	Gaz Jones
RR-1007	GDPR Protected 003
RR-1008	Gillian Holland
RR-1009	Graham Reeve
RR-1010	Graham Stack
RR-1011	Graham Thompson
RR-1012	Graham Webber
RR-1013	Fiona McGlone on behalf of Hascombe & Valiant Stud Ltd
RR-1014	Hayley James
RR-1015	Helen Bolton
RR-1016	Helen Taylor
RR-1017	Bryan Cave Leighton Paisner LLP on behalf of HPUT A Limited and HPUT B Limited
RR-1018	Ian Finch

RR-1019	Ian Thorburn
RR-1020	Ian Wilkinson
RR-1021	Jacqueline Rushbrook
RR-1022	Jacqueline Gordge
RR-1023	Jacqueline Reed
RR-1024	Jade James
RR-1025	Jake Priestley
RR-1026	James Fanshawe
RR-1027	Jan Chilcott
RR-1028	Jane James
RR-1029	Jane Leitch
RR-1030	Janet Summers
RR-1031	Jean Mullin
RR-1032	Jean Whitaker
RR-1033	Jennie McClure
RR-1034	Jo Boyd
RR-1035	Joanna Priestley
RR-1036	Joanne Haffenden
RR-1037	John C Taylor
RR-1038	John Osborne
RR-1039	Jordon Millward
RR-1040	Julian Campbell
RR-1041	Julie Seabrook
RR-1042	June Margaret Jenkins
RR-1043	Kate Hogg
RR-1044	Katherine Stanier
RR-1045	Katherine Stewart
RR-1046	Kathleen Tilbrook

RR-1047	Katie
RR-1048	Kelly Beck
RR-1049	L A Sampford
RR-1050	Laura Gilligan
RR-1051	Leanne Butler
RR-1052	Leanne Dunsmuir
RR-1053	Leanne Fordham
RR-1054	Lesley Haird
RR-1055	Linda Talbot
RR-1056	Lionel Duncan
RR-1057	Lisa Bowman
RR-1058	Lizzy Campbell
RR-1059	Lorraine Fairhead
RR-1060	Louise Sampson
RR-1061	Louise Webber
RR-1062	Luis Dos Remedios
RR-1063	Luke Harris MBA BSc (Hons) IEng MIGEM CMgr MCMI
RR-1064	Maria Linkin
RR-1065	Maria Wilson
RR-1066	Marianne Corbin
RR-1067	Mark Homan
RR-1068	Mark Philip Lake
RR-1069	Mark Webb
RR-1070	Martine Dantonio
RR-1071	Matt Hogg
RR-1072	Maureen Cross
RR-1073	Melanie Howlett

RR-1074	Michael Andrews
RR-1075	Michael Cullen
RR-1076	Michael Francis
RR-1077	Michael Jacob
RR-1078	Millennium Centre
RR-1079	Miss Ria Smulovic
RR-1080	Mr A Lemmon
RR-1081	Mr Anthony Chainey
RR-1082	Mr Colin Saich
RR-1083	Mr David Neal
RR-1084	Mr J R Herring
RR-1085	Mr Joao Soares
RR-1086	Mrs Dawn Dicker
RR-1087	Mrs E A Muldoon
RR-1088	Mrs J Palmer
RR-1089	Mrs Jayne Chainey
RR-1090	Mrs Jennifer Hedley
RR-1091	Mrs Kathy Ogilvie
RR-1092	Mrs Linda Saich
RR-1093	Mrs Lucie Smith
RR-1094	Mrs R Peachey
RR-1095	Mrs Susan Hall
RR-1096	Mrs Victoria Pakenham
RR-1097	Natalie Carr
RR-1098	Natalie Overton
RR-1099	Nicholas Leonard
RR-1100	Nick Johnson
RR-1101	Nick Parsons

RR-1102	Nick Wright
RR-1103	Nicola Louise Palmer
RR-1104	Norman Salmon
RR-1105	Pat Cleary
RR-1106	Paul Argles
RR-1107	Peter Alder
RR-1108	Peter Bishop
RR-1109	Peter Moggridge
RR-1110	Peter Williams
RR-1111	Raymond Kettridge
RR-1112	Red Lodge Parish Council
RR-1113	Rich Woolsey
RR-1114	Richard Mills
RR-1115	Rob Wilkinson
RR-1116	Robert Gould
RR-1117	Robin Gotobed
RR-1118	Ros Oke
RR-1119	Russell Waller
RR-1120	Ruth Sheikh
RR-1121	Sally Bycroft
RR-1122	Sam
RR-1123	Samantha Kempers
RR-1124	Sana Wajid
RR-1125	Sandie Geddes
RR-1126	Sarah Barrett
RR-1127	Sarah Pollard

RR-1128	Munro Consultants Ltd on behalf of Say Not To Sunnica Action Group Ltd
RR-1129	Sharon Clayson
RR-1130	Shazia Shujah
RR-1131	Sian Chilcott
RR-1132	Simon Hope
RR-1133	Simon McMunn
RR-1134	Simon Sampson
RR-1135	Sir Mark Prescott
RR-1136	Snailwell Parish Council
RR-1137	Solar Campaign Alliance
RR-1138	Shakespeare Martineau on behalf of South Staffordshire Water PLC
RR-1139	Stephanie Dunmore
RR-1140	Steven Jones
RR-1141	Steven Levell
RR-1142	Suffolk Wildlife Trust
RR-1143	Tara Kusch
RR-1144	Tattersalls Ltd
RR-1145	Tim Holland-Martin
RR-1146	Toni Saade
RR-1147	Tristan Askew
RR-1148	Valerie McClure
RR-1149	Wendy Dickins
RR-1150	Wendy Parsons
RR-1151	William James
RR-1152	William McClure

RR-1153	Adam Eatock
RR-1154	Truly Ko on behalf of Adrian Ko
RR-1155	Alan Gordon Sharp
RR-1156	Ali Killingback
RR-1157	Alison French
RR-1158	Rosalind Bavington George on behalf of Alun George
RR-1159	Amanda Benton
RR-1160	Amanda Golding
RR-1161	Andrea Flynn
RR-1162	Andrew Stephens
RR-1163	Anna Jones
RR-1164	Anna Louisa Maxwell
RR-1165	Anna-Katharina Jung
RR-1166	Anne Roberts
RR-1167	Annette Flindall
RR-1168	Anthony French
RR-1169	Anthony Hollyer
RR-1170	Bidwells on behalf of B C Mitcham Farms Ltd
RR-1171	Barbara Ann Bradshaw
RR-1172	Barry Garwood
RR-1173	Bennie Smalls
RR-1174	Beverley Gale
RR-1175	Brian Prince
RR-1176	Cadent Gas Limited

RR-1177	Cambridgeshire and Peterborough Combined Authority
RR-1179	Carol Ann Marner
RR-1180	Caroline Lancaster
RR-1181	Catherine Audus
RR-1182	Catherine Noakes
RR-1183	Catherine Tuli
RR-1184	Ceryn Hopla
RR-1185	Ian Maclaren on behalf of Charlotte Maclaren
RR-1186	Chloe Barker
RR-1187	Chris Morrell
RR-1188	Sophie Louise Rixon on behalf of Christina Rixon
RR-1189	Christopher Burrows
RR-1190	Claire Muldoon
RR-1191	Claire Murphy
RR-1192	Colin Pountney
RR-1193	Colin Purton
RR-1194	Cynthia Bates
RR-1195	Daniel Hilsden
RR-1196	Danielle Powles
RR-1197	Darren Fitch
RR-1198	David Coe
RR-1199	David Heggs
RR-1200	Dawn Burford
RR-1201	Beverley Gale on behalf of Dean Carter

RR-1202	Debbie Plowman
RR-1203	Denise Shea
RR-1204	Derik Bawden
RR-1205	Douglas Hall
RR-1206	Dr Catherine Judkins
RR-1207	Emma Sutherland
RR-1209	Fenella Maxwell
RR-1210	Fiona Glenn
RR-1211	Fiona Maxwell
RR-1212	Francesca Muldoon
RR-1213	Frederic Barrelet
RR-1214	George Boughey
RR-1215	Georgina Elizabeth Stewart
RR-1216	Georgina Gold
RR-1217	Greta Crosbie
RR-1218	Grzegorz Smulko
RR-1219	Hannah White
RR-1220	Hayley Keddy
RR-1221	Heather Evans
RR-1222	Helen Baseley
RR-1223	Helen Housden
RR-1224	Helen Palmer
RR-1225	Helen Palmer
RR-1227	Hugo Lascelles
RR-1228	Ian Shipp
RR-1229	Isobel Chalmers
RR-1230	Isobel Newport-Mangell
RR-1231	Jacqueline Clarkin

RR-1232	Jadwiga Smulko
RR-1233	James Golding
RR-1234	James Plowman
RR-1235	Jamie Barker
RR-1236	Jenny Bawden
RR-1237	Jessica Wright
RR-1238	Joanna Lascelles
RR-1239	Joanne Fallowfield
RR-1240	John Hadley
RR-1241	John Roberts
RR-1242	Joseph Bryson-Hill
RR-1243	Josephine Skillen
RR-1244	Joshua Dennis
RR-1245	Julia Wordsworth
RR-1246	Justin Fuga
RR-1247	Karen Allitt
RR-1248	Kate Hodgson
RR-1249	Kay Beckett
RR-1250	Kennett Parish Council
RR-1251	Kevin Brown
RR-1252	Kevin Getchell
RR-1253	Leanna Bye
RR-1254	Lee Heath
RR-1255	Lisa George
RR-1256	Lorenzo Atzori
RR-1257	Lorraine Parker
RR-1258	Louise Laird

RR-1259	Paul Mangell on behalf of Lucie Newport Mangell
RR-1260	Lynn Hayes
RR-1261	Bidwells on behalf of M J Mitcham as Trustee of the Heritage SIPP
RR-1262	Bidwells on behalf of M R & T A Mitcham & Lonsdale Pensions Trustees
RR-1263	Bidwells on behalf of M R Mitcham
RR-1264	Madeleine Sanderson
RR-1265	Marc Dunand
RR-1266	Margaret Bell
RR-1267	Mark Chinery
RR-1268	Mark Simmons
RR-1269	Mary Smith
RR-1270	Michael Caves
RR-1271	Michael Haworth
RR-1272	Michael Robinson
RR-1273	Mike Gardner
RR-1274	Ministry of Defence
RR-1275	Bidwells on behalf of Mitcham Contracts (Burwell) Ltd
RR-1276	Mr Martin Chambers
RR-1277	Mr Stuart Hall
RR-1278	Mr. Mark Symons
RR-1279	Mrs J Brunning
RR-1280	Mrs Janet Frost

RR-1281	Mrs Josephine Skillen
RR-1282	Mrs R Evans
RR-1283	Mrs S M Pamment
RR-1284	Mrs Sandra Holmes
RR-1285	Mrs Susanna Heath
RR-1286	Mrs Susie Gardner
RR-1287	Mrs. Scott
RR-1288	Natalie Caves
RR-1289	Eversheds Sutherland (International) LLP on behalf of National Grid Electricity Transmission Plc
RR-1290	Eversheds Sutherland (International) LLP on behalf of National Grid Gas Plc
RR-1292	Addleshaw Goddard on behalf of Network Rail Infrastructure Limited
RR-1293	Nick Foster
RR-1294	Nick Pearson
RR-1295	Paul Harold Mangell
RR-1296	Paul Holmes
RR-1297	Paul Landini
RR-1298	Pernilla Vizard
RR-1299	Peter Daykin
RR-1300	Peter Maxwell
RR-1301	Peter Spencer
RR-1302	Peter Wilkin
RR-1303	Philip Davis

RR-1304	Philip Underwood
RR-1305	Rachel Davies
RR-1306	Rachel Jaggard
RR-1307	Rebecca Richards
RR-1308	Richard Coxhead
RR-1309	Richard Fusniak
RR-1310	Richard Markwell
RR-1311	Richard May
RR-1312	Richard Rice
RR-1313	Richard Savage
RR-1314	Richard Warburton
RR-1315	Robert Love
RR-1316	Robert Shortland
RR-1317	Roger Dicker
RR-1318	Rosalind George
RR-1319	Sam Hawley
RR-1320	Samantha Harrison
RR-1321	Samantha Hill
RR-1322	Samantha Speed
RR-1323	Sandra Bryson-Hill
RR-1324	Sandra Desborough
RR-1325	Sara
RR-1326	Sarah Wick
RR-1327	Sebastiano Pagliaro
RR-1328	Sharon Phillips
RR-1329	Sharon Thompson
RR-1330	Sheila Taylor
RR-1331	Simon Marsh

RR-1332	Simon Morse
RR-1333	Sonia Johnson
RR-1334	Sophie Hall
RR-1335	Sophie Louise Rixon
RR-1336	St Margaret's Church Chippenham Parochial Church Council
RR-1337	Stephen Tompson
RR-1338	Steve Clarkin
RR-1339	Sue Spencer
RR-1341	Susan Eckholdt
RR-1342	Suzanne Connolly
RR-1343	The Jockey Club Rooms
RR-1344	Tim Malim
RR-1345	Tom Fanshawe
RR-1346	Tony Neal
RR-1347	Truly ko
RR-1348	Turner
RR-1349	Valerie Rice
RR-1350	Wendy Clare
RR-1352	Yasmin Holt
RR-1353	Yvonne James
RR-1354	Zoe Leeson
RR-1355	Hilary Anderson
RR-1356	Hugh Palmer
RR-1357	Patricia Shaw
RR-1358	Ralph Riley
RR-1359	Stephanie Riley

RR-1360	Ruth Diver
AS-013 (Additional Submission)	East of England Ambulance Service Trust
AS-019 (Additional Submission)	RESCUE, British Archaeological Trust

2 Statutory bodies' Relevant Representations and the Applicant's responses

2.1 RR-1340 Suffolk County Council

Applicant responses to RR-1340

Applicant's Ref.	Theme	Issue	Summary of issue raised	Applicant's response
SCC-1	Other	Development consent	SCC is unable to support the proposal as it stands and considers that development consent should not be granted for the proposal as submitted.	This comment is noted. However, the Applicant respectfully disagrees and considers that development consent should be granted for the Scheme. The Scheme will be a critical part of the development of the UK's portfolio of large-scale solar generation required to decarbonise its energy supply quickly and provide secure and affordable energy supplies. The Applicant will continue to work with Suffolk County Council and seek to address its concerns.
SCC-2	Renewable energy and climate change	Local authority policy	In general, SCC has adopted a policy of being supportive in principle to renewable and low carbon energy generation schemes, while working to ensure that the impacts of these schemes are suitably minimised.	This comment is noted. The impacts of the Scheme have been reduced and minimised through the Environmental Impact Assessment process.
SCC-3	EIA process	Assessment	The draft DCO is unacceptable as several key assessments are inadequate, making it impossible for a decision-maker to evaluate the significance and degree of impacts.	The Applicant respectfully disagrees with SCC and considers that its application is adequate and gives a clear indication of the benefits and impacts of the Scheme. However, the Applicant is currently undertaking further engagement with SCC in order to understand its concerns and to allow the Council to elucidate the additional evidence requested.
SCC-4	EIA process	Assessment	The lack of precision in assessments, if not corrected, would also cause challenges in the post-consent detailed design phase and risk	The Applicant is currently undertaking further engagement with SCC in order to understand its concerns and to elucidate the additional evidence requested. However, the

			confusion over the limits of materiality for any proposed changes.	Applicant considers that the assessment is robust and the mechanisms for approval of detailed mitigation measures sufficient.
SCC-5	Other	Examination process	SCC suggest that a date should not be set for a Preliminary Meeting until an action plan to address the evidential issues has been agreed between the applicant and the local authorities.	This comment is noted. However, the Applicant considers that no such action plan is necessary.
SCC-6	Design	Scale	SCC remains concerned about the scale of this particular proposal, both physically and temporally, and the resulting impacts, which will be explored fully in the Local Impact Report.	This comment is noted. The Statement of Need [APP-260] builds upon the case for need established in the National Policy Statements (NPSs) for the urgent development of low carbon electricity generation, and sets out the need for a rapid increase in low carbon electricity generation capacity in Great Britain to meet decarbonisation obligations, and the critical role that large-scale solar schemes will play in meeting that need.
SCC-7	Operations	Operating life	SCC considers that the proposed lifespan of the project of 40 years, and the consequent temporal accumulation of adverse effects, has not been justified in the application nor demonstrated to be reasonable and appropriate.	Refer to RR SCC-52 in this table.
SCC-8	Design	Design process	SCC is concerned that insufficient regard has been had to the mitigation hierarchy, and that all reasonable efforts have not been made to avoid, prevent, and reduce impacts, before turning to mitigation or compensatory/offsetting measures.	The Applicant respectfully disagrees with this comment. The mitigation hierarchy has been followed throughout design and assessment of the Scheme and all efforts have been made to avoid, prevent and reduce impacts before turning to mitigation or compensatory/offsetting measures. For example, a number of areas (over 30% of the Scheme area) have been left out of the developable area of the Scheme in order to avoid impacts to local residents, archaeology and biodiversity.
SCC-9	Design	Mitigation	SCC is concerned that residual adverse impacts have not been minimised to the greatest extent or offset where further mitigation is not practicable.	The Applicant respectfully disagrees with this comment and considers that all impacts have been minimised and offset to the greatest extent practicable.

				The Applicant is currently undertaking further engagement with SCC in order to elucidate the additional evidence requested by SCC.
SCC-10	EIA process	Assessment	SCC considers the current low quality of assessments and evidence within the Environmental Statement (ES) by the Applicant on a number of topics to be unacceptable: many of the assessments are lacking crucial information or are not sound enough to provide useful conclusions on impacts. Consequently, the mitigation package proposed is insufficient and not evidence based - some of the impacts anticipated by SCC are not mitigated at all, whilst, where mitigation is proposed, it often lacks ambition.	The Applicant respectfully disagrees with this comment and considers that the scope of its assessments and the mitigation strategies proposed are robust, including detailed requirements that are specific to the Scheme's location and impacts. The Applicant is currently undertaking further engagement with SCC in order to understand its concerns and to elucidate the additional evidence requested.
SCC-11	Landscape and visual amenity	Assessment	The scale, longevity and geographical distribution of the proposed development are likely to result in significant adverse effects as a result of intra-cumulative and accumulated impacts. SCC is concerned that, due to the way evidence is presented the ES assessment tends to under-estimate impacts. Mitigation proposals are not sufficiently tailored across a variety of landscape character types, and are not ambitious enough to sufficiently deal with the degree of harm caused by the project.	The Landscape and Visual Impact Assessment (LVIA) set out in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] summarises the effects on the landscape in detail, from the national scale, through regional, county, district and neighbourhood scales to local landscape character areas defined by the Applicant. It is acknowledged that there will be broad-scale change to the character of the landscape at the site level and within parts of the Rolling Estate Chalklands landscape character type (LT) defined within the Suffolk Landscape Character Assessment 2010 – for further information, please refer to Appendix 10D - Published Landscape Character Extracts of the Environmental Statement [APP-103]. Effects on the landscape as a resource in its own right and effects on people's views of the landscape have been considered separately in line with best practice. Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] and associated appendices provides a detailed assessment of landscape and visual effects on each receptor. This includes an assessment of landscape effects at different scales and on sequential views from roads and public rights of way accounting for the different

				sites, which have been assessed with reference to representative viewpoints. Mitigation, including offsets and planting, has been proposed to address and minimise adverse effects on the character of the landscape experienced along the route and views of the landscape. This is in line with the agreed methodology and the proportional approach advocated by the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition. Regarding the longevity of impacts, as noted in paragraph 10.3.6 of Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042], the following terminology and durations have been used for the landscape and visual assessment: a. Short term durations are considered to be two years or less; b. medium term durations are considered to be between two and ten years; and c. long term durations are considered to be more than ten years. Paragraph 10.3.7 states that the Local Planning Authority (LPA) response to engagement with the Applicant (17 February 2020) noted these terms and durations were acceptable. To draw distinctions between the duration and permanence of effects, the following assessment years were considered: a. Scheme construction (winter); b. Scheme operation year 1 (earliest 2025) (winter); c. Scheme operation year 15 (earliest 2040), (summer); and

				d. Scheme decommissioning (earliest 2065), (summer). This is in line with the methodology set out in Appendix 10C of the Environmental Statement [APP-102] and the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition (paragraph 3.22). Effects on some receptors would be significant at construction and year 1 of operation, reducing in the most part to not significant at year 15 of operation. Residual significant effects are predicted for some landscape receptors at year 15 of operation, particularly relating to intra project effects, as set out in Appendix 10G of the Environmental Statement [APP-106]. The Scheme has been designed to retain the existing landscape pattern and features as far as possible and effects on landscape character will be localised. Whilst it is acknowledged that some key characteristics, such as openness, will change, the majority of key characteristics will be retained. For example, within the Rolling Estate Chalklands landscape character type (LT), the large uniform fields enclosed by low hawthorn hedges and shelter belt planting will be retained and the clustered villages with flint and thatch vernacular houses and many new large “prestige” homes in villages will not be altered. Further information is set out in the Landscape and Ecology Management Plan included as Appendix 10I of the ES [REF-108]. With regard to ecology and nature conservation, consideration is given to specific receptors present across the multiple sites and assesses the Scheme wide impacts within the Order limits.

				Appendix 10I, Landscape and Ecology Management Plan of the Environmental Statement [APP-108] sets out the rationale for habitat creation, including how it forms a coherent nature network across the multiple sites. For example, paragraph 1.7.29 sets out how the Scheme will align with and contribute to Buglife's B-Lines project, providing landscape scale benefits for pollinators through increased habitat provision and connectivity. Annex C sets out the indicative grass mixes to be sown across the Scheme and grazing regimes for management. Areas designated for conservation grazing have been incorporated to link in with the B-Lines project through allowing diverse grasslands to establish and be managed for the benefit of pollinators. Further detail on these measures and how habitat creation will link to form a coherent biodiversity network including their long-term management will be set out in the detailed LEMP to be approved by the local planning authority at the detailed design stage.
SCC-12	Landscape and visual amenity	Assessment	SCC expects the Applicant to provide a more thorough presentation of key areas of impact, and to work with the local authorities to reduce these impacts on the most sensitive receptors by redesigning elements of the scheme and propose more ambitious mitigation proposals.	Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] and associated appendices [APP-100 to APP-108] provide a thorough and detailed assessment of the likely effects of the Scheme on specifically considered landscape and visual receptors and appropriate mitigation which takes account of the surroundings of the Scheme. These documents set out the key areas of impact and related mitigation. The LVIA and the design of the Scheme was carried out in consideration of comments made in the Scoping Opinion (refer to Appendix 1B of the Environmental Statement [APP-052]) and in meetings between the Applicant and relevant local planning authorities during the pre-application period). The Applicant has been undertaking further discussions with SCC to explain how the design and mitigation proposals have developed over time to account for key areas of impact.

SCC-13	Transport and access	Pre-application engagement	As a result of the Applicant not having undertaken pre-submission engagement with SCC on the transport assessment, SCC has not had the opportunity to discuss or provide comments on the methodologies for the Transport Assessment [APP-117] and the ES assessment of Transport and Access impacts [APP-045] pre-submission.	The Applicant respectfully disagrees with this assertion. Before the production of the Preliminary Environmental Information Report (PEIR) consultation was undertaken with both Local Highways Authorities (LHAs) and National Highways including the methodology for the PEIR. After the production of the PEIR and before the production of the ES [APP-032 – APP-259], two meetings were held with the LHAs and an additional meeting held with National Highways with identified the approach for the ES. Further consultation was undertaken via email correspondence with SCC regarding specific topics. The Environmental Statement includes a summary of comments raised by SCC, and how they have been addressed.
SCC-14	Transport and access	Assessment	The submitted material is not considered by SCC to be acceptable. SCC consider the assessments seriously flawed they fail to evidence conclusions, and SCC disagrees with many of the assumptions used, including the workforce modelling as an input to the transport assessment. There are also deficiencies in the highway-related provisions in the draft DCO.	The assumptions and mitigation is set out in Chapter 13: Transport and Access of the Environmental Statement [APP-045], Appendix 13B (Transport Assessment) of the Environmental Statement [APP-117] and Appendix 13C (Framework Construction Traffic Management Plan and Travel Plan) of the Environmental Statement [APP-118]. It is un-clear which specific assumptions or part of the workforce modelling is in question. Responses to specific points raised are included throughout this document. The Applicant is in discussions with SCC on their comment that there are deficiencies in the highway – related provisions in the draft DCO [APP-019] and will seek to agree a position with SCC during the examination.
SCC-15	Transport and access	Assessment	SCC expects of the Applicant as a minimum to update the ES chapter on transport and the transport assessment and methodology, in order to provide credible evidence of impact and required mitigation, to accordingly improve the mitigation proposals, and to re-write the highway provisions in the DCO.	Further to a meeting with both local Highways Authorities on 26 April 2022, it was agreed that additional technical information would be supplied to the councils. This will be supplementary information and potential sensitivity testing, and is not anticipated to require an update to Chapter 13: Transport and Access of the Environmental Statement [APP-045]. The mitigation has been clearly evidenced and is outlined in Appendix 13C (Framework Construction

				Traffic Management Plan and Travel Plan) of the Environmental Statement [APP-118] as well as the Traffic Regulation Measures Plans – Road Closures [APP-009 to APP-011]. The Applicant is in discussions with SCC on their comment that there are deficiencies in the highway – related provisions in the draft DCO and will seek to agree a position with SCC during the examination.
SCC-16	Land use	Assessment	Inappropriate baseline evidence and assumptions mean that the workforce modelling contained in the Socio-economics chapter of the ES is unsound as a basis for the Outline Skills, Supply Chain and Employment Plan. This has implications for any other assessments that would be expected to make use of this modelling, such as Transport.	The Applicant considers that the approach taken to the baseline modelling underpinning assessment of construction employment generation presented in Chapter 12: Socio-economics and Land Use of the Environmental Statement [APP-044] is appropriate, as it is based on good practice guidance (HCA Additionality Guidance). The conclusions of the assessment are also considered to be sound both on this basis and previous experience. The Applicant is liaising with SCC to discuss its concerns.
SCC-17	Land use	Assessment	Contrary to the Applicant's assessments, SCC does not anticipate employment and socio-economic benefits of any significance. Until sound assessments can be provided, SCC asks the ExA to consider that local and regional socio-economic benefits are negligible for this project.	The employment and socio-economic benefits of the Scheme are as reported in Chapter 12: Socio-economics and Land Use of the Environmental Statement [APP-044]. This reports that there is a significant temporary beneficial effect arising from the generation of construction and decommissioning employment and from the associated increase in gross value added (GVA) during construction respectively. The conclusions of the assessment are considered to be sound both on this basis and previous experience. To maximise and expand the economic benefits of the Scheme for the local community an Outline Skills, Supply Chain and Employment Plan [APP-268] has been included in the Application. The Applicant's assessments are considered robust and the Council has not provided any clarity as to why it considers

				the assessment to be unacceptable. The Applicant is liaising with SCC to discuss its concerns.
SCC-18	Landscape and visual amenity	Landscape and Visual impact	A project of the scale and nature proposed, which will radically change the sense of place, the place attachment of the residents, and the recreational amenities of the affected villages and communities, over a long period of time. It will also change the character of an area which has been shaped by a unique combination of agriculture and horse racing. The ES does not recognise this, and the need to mitigate/compensate for these impacts.	The landscape within the study area is the product of centuries of increasingly intense agricultural expansion and development. It is, by design, a productive landscape. A detailed assessment of landscape character has considered the likely effects of the Scheme on the landscape at different scales. Most of the area is under intensive arable production with some areas of pasture around village edges and is interspersed with other uses such as settlement, large-scale free range pig farming and quarrying. In the southern part of the study area, the horse racing industry has transformed the landscape with extensive, manicured training areas and associated facilities. Important areas for nature and historic conservation are recognised as islands within the agricultural landscape. The Scheme is large and to mitigate this it has been designed as a series of discrete sites separated by substantial areas of largely intensively managed agricultural land and offsets from settlement edges. The landscape on the fringes of these settlements, which is not proposed to include above ground infrastructure related to the Scheme, tends to be more intricate than the surrounding arable land, with smaller fields defined by mature vegetation and well vegetated gardens. This, together with tree and shrub and hedgerow planting proposed as part of the masterplan for the Scheme, will maintain the sense of place and place attachment of residents. Several settlements are located in the study area defined within Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042]. Individual community areas are described in turn below: • Worlington – This small village, centred on The Street, is the closest to proposed solar farm

				infrastructure within Sunnica East Site B. The nearest area of solar panels (parcel E24) would be located 220m from the property of Queens Hill, on the southern edge of the village. Chalk grassland and a belt of woodland is proposed between the southern edge of the village and the solar panel arrays. Parcels E26 and E27 would be located approximately 200m south of the club house of the Royal Worlington and Newmarket Golf Club, which is surrounded by dense vegetation and beyond shelter belts which would enclose the Scheme. On the western edge of the village, solar farm development within parcel E12 would be located approximately 270m south of the closest property, beyond an area of open land currently used for free range pig farming. This open edge would be retained by an extensive area of grassland (ECO3). In summary, proposed offsets and the density of existing and proposed vegetation would limit perception of the Scheme and the potential effects on the setting of the settlement. • Red Lodge – This is a largely post-war settlement, centred on Warren Road. The closest part of the Scheme would be parcel E21 of Sunnica East Site B, located approximately 450m west of Red Lodge, beyond the busy A11 trunk road and industrial development on Bridge End Road. The sense of place and place attachment of residents will not be affected. • Freckenham – The closest area of solar panels to this village would be parcel E05 in Sunnica East, approximately 1.2km to the north, with native grassland within ECO1 and ECO2 and several belts of existing and proposed vegetation in between on boundaries of fields in the largely flat landscape. The sense of place and place attachment of residents will not be affected.

				• Isleham – Solar panels would be located approximately 500m from the southeastern corner of the village in parcel E05 of Sunnica East, beyond intervening arable land. A belt of woodland is proposed to enclose and screen the structures. Solar panels in parcels EE01 and E03 would be located approximately 1.2km from the eastern edge of the village, beyond Lee Brook, which is not perceptible due to intervening vegetation in the flat landscape. • West Row – The southern edge of this small village would be located approximately 700m from the closest area of solar panels to the southwest located in parcel E02 of Sunnica East. The Scheme would lie beyond the well-vegetated River Lark. • Fordham – The closest area of solar panels to Fordham would be parcels W01 and W02 of Sunnica West, approximately 1km south of the settlement and located to the east of Snailwell. There is substantial woodland and other mature vegetation in the intervening landscape, such that the Scheme will not affects its setting or character. • Chippenham – This small village lies to the north of Chippenham Park and Gardens. The closest part of the Sunnica East Site B would be parcel E19, approximately 2km to the northeast. The closest part of Sunnica West would be approximately 1.6km south, beyond Chippenham Park and Gardens. The sense of place and place attachment of residents will not be affected. • Snailwell – The hamlet of Snailwell would be located approximately 260m west of the closest area of solar panels in parcel W03 of Sunnica West, enclosed by proposed woodland planting and screened by intervening vegetation and rising land. There would also be solar panels in parcel W02 to the north, beyond an existing belt of mature trees.

				The sense of place and place attachment of residents will not be affected. Burwell – The proposed cable connection at Burwell would be located adjacent to and in the context of the existing substation. The fields on the western side of the village are small and defined by tree lines and dense hedgerows, creating physical separation from the sub-station. In summary, it is acknowledged that the scale of the Scheme is large. The layout, across discrete sites within Sunnica A and Sunnica B, is intentional. The Scheme has been designed to avoid development within or directly on the boundaries of existing settlement and to retain separation between settlements and the wider landscape. Significant effects on the sense of place and place attachment of residents of settlements is not likely. There are sections of roads where solar farm infrastructure would be in closer proximity, for example to the north of Beck Road between Isleham and south of the B1102 Freckenham Road between Worlington and Freckenham. In such cases mitigation has included limiting development to one side of the road, providing offsets of grassland and additional planting to enclose and screen solar farm infrastructure.
SCC-19	Other	Local benefits	SCC expects an appropriate mitigation/compensation package for local communities.	An Outline Skills, Supply Chain and Employment Plan has been submitted as part of the DCO Application [APP-268] and has been updated in response to the relevant representation. This seeks to secure the potential improvements, mitigation and compensation to local communities that could be implemented as part of the Scheme. The opportunities for this that the Outline Plan highlights are: - Provision of apprenticeships; - Provision of other workforce training;

				• Support with STEM Education and Careers; • Measures to secure local recruitment; • Maximisation of the Diversity of the Workforce; • Business Networking and Support; and, • An inclusive procurement Strategy In addition, the Applicant is in discussions with the council regarding wider community benefits.
SCC-20	Heritage	Assessment	SCC Archaeological Service has been working with the Applicant on the design and carrying out of archaeological evaluation work since early stages of the project. While there is potential for SCC to reach agreement with the Applicant on this matter during the examination, at the present time a full evaluation report has not been presented as part of the application, and mitigation has not yet been secured in the draft DCO or through obligations.	Mitigation is detailed in paragraph 7.6.6 to 7.6.9 and in Section 7.8 of Chapter 7: Cultural Heritage of the Environmental Statement [APP-039]. However, as noted in paragraph 7.8.4 “<i>Outstanding results, from evaluation trenching that was delayed due to land access and cropping schedule constraints, will be submitted prior to the examination stage of this application.</i>” This information was required before a more specific mitigation strategy could be completed. The outstanding results of the evaluation was submitted to the ExA at Procedural Deadline A. A Detailed Archaeological Mitigation Strategy will be prepared for discussion with the County Councils and will be submitted to the Examination. The draft DCO [APP-019] does already provide for the securing of archaeological mitigation through Requirement 13.
SCC-21	Heritage	Assessment	SCC must reserve its position pending sight of a full archaeological evaluation report and firm proposals how mitigation can be secured.	The full archaeological evaluation report was submitted to the ExA at Procedural Deadline A. The archaeological evaluation report will inform the preparation of the Detailed Archaeological Mitigation Strategy.
SCC-22	Ecology	Assessment	For this kind of project it should be possible for the Applicant to deliver sufficient ecological mitigation and enhancement, but gaps in the assessment must be corrected and adherence to the mitigation hierarchy should be more clearly evidenced. Outline mitigation proposals are lacking in detail, meaning that at present	The Scheme has followed the mitigation hierarchy and sought to avoid impacts to important ecological features, where possible. With reference to Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040], important ecological features identified as part of the detailed baseline surveys are reported in Tables 8-4, 8-5, 8-6, 8-7 and 8-8. Section 8.8 sets out avoidance and mitigation measures for important ecological features, with an assessment of likely residual impacts and effects

			there is a lack of clarity concerning residual impacts.	undertaken in section 8.9. For example, details of the habitat creation and management for Stone Curlew is provided in Section 4 of the Offsetting Habitat Provision for Stone-Curlew Specification [APP-258] and Section 1.8 of the Landscape and Ecology Management Plan [APP-108]. In addition, specific areas will be managed for arable plants (refer to the illustrative parameter plans (see Figures 3-1 and 3-2 of the Environmental Statement) within Sunnica East Site B. Here four 3x20m wide strips will be provided in field E30 and four 3x10m wide strips in field E17/18. The creation and management of these plots is set out in paragraph 8.8.10 7 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040]. This will protect the long-term future of arable flora across the Order limits. Further details and examples of mitigation proposals are set out in Section 8.8 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] and the Landscape and Ecology Management Plan [APP-108]. The Applicant would welcome the Council identifying where it considers there are gaps in the assessment, lack of detail in the mitigation proposals and lack of clarity regarding residual impacts.
SCC-23	Ecology	Assessment	SCC requires from the Applicant that gaps in the assessments are closed. Further detail and evidence of the mitigation proposals, in line with the mitigation hierarchy, have to be presented, and mitigation must be appropriately secured in the dDCO or in planning obligations. SCC must reserve its position pending sight of this information.	As per SCC-22, the Applicant would welcome the Council identifying where they consider there are gaps in the assessment and the required further detail and evidence of the mitigation proposals. The development of ecological mitigation is secured pursuant to Requirement 8 of the draft DCO [APP-019].
SCC-24	Water resources	Flooding and drainage	SCC's review of the submitted materials and well as its local knowledge as Lead Local Flood Authority, indicates that there are few outstanding issues; these are likely be resolved through further technical work.	This comment is noted.

SCC-25	Human health	Battery safety	SCC has, in its role as Suffolk Fire and Rescue Authority, outlined to the Applicant its firefighting requirements for dealing with the unique characteristics of Battery Energy Storage System fires. An initial review of the Outline Battery Fire Safety Management Plan [APP-267] indicates that appropriate measures will be put in place. Subject to securing appropriate mechanisms in the DCO, it is likely that agreement can be reached during the examination.	The draft Development Consent Order [APP-019] includes requirement 7 in Schedule 2 which secures the Battery Fire Safety Management Plan ("BFSMP"). The BFSMP is to be approved by the relevant planning authorities, in consultation with the fire and rescue services. The BFSMP must be in accordance with the Outline BFSMP which accompanies the application [APP-267] . If SCC accepts that the Outline BFSMP then the Applicant will seek to agree this in a Statement of Common Ground.
SCC-26	Planning	National policy statements	SCC agrees with the Applicant's planning statement (see 1.4.4 – 1.4.5 of [APP-261]) that National Policy Statement EN-3 does not 'have effect' for the purposes of S104 of the Planning Act 2008, and that therefore it is appropriate for the application to be decided under S105, unless at some point during the examination the draft EN-3 is designated.	This comment is noted. However, the Applicant does not expect the draft NPSs to have effect under section 104 of the PA 2008 even if they are designated during the course of the examination. Transitional arrangements for the draft Energy NPSs are set out in Section 1.6 of Draft NPS EN-1. This states at paragraphs 1.6.2 and 1.6.3 that: <i>"...The 2021 amendments will therefore have effect only in relation to those applications for development consent accepted for examination after the designation of those amendments.</i> <i>However, any emerging draft NPSs (or those designated but not having effect) are potentially capable of being important and relevant considerations in the decision making process. The extent to which they are relevant is a matter for the relevant Secretary of State to consider within the framework of the Planning Act and with regard to the specific circumstances of each development consent order application."</i> Although draft NPS EN-3 is in draft form and has not been designated, the Applicant expects that the Secretary of State will consider it to be relevant and important to their decision, as was the case for the recent decision on the

				Little Crow Solar Park DCO. This is because it is the most recent expression of government policy and is in a relatively advanced stage of preparation. Despite the transitional arrangements set out in the document, should draft NPS EN-3 be designated before the DCO application is decided, the Applicant considers that the weight given to it in the Secretary of State's decision should be significant, since it would represent policy that is in force that directly concerns the type of development that the Scheme comprises.
SCC-27	Planning	National policy statements	In SCC's view both the current and draft National Policy Statements are likely to be 'important and relevant' for the purposes of S105(2). As the draft EN-3 contains technology specific policy relating to large-scale solar development SCC thinks it is clearly more relevant in this case than the currently designated EN-3, notwithstanding that it is yet to be designated.	The Applicant agrees with this statement.
SCC-28	Planning	National policy statements	Given the possibility that draft EN-3 may be designated before either the conclusion of the examination, or the grant of consent, SCC considers that it would be helpful if the Applicant address points raised by draft EN-3 but not covered in their planning statement such as: • Providing the site capacity on the basis of the AC capacity of inverters as per 2.48.7 of draft EN-3. SCC considers that the capacity of the project would be useful for the decision-maker in contextualising the benefits of the project and weighing them against adverse impacts.	Please see the response to SCC-26 regarding transitional arrangements in the event NPS EN-3 is designated before either the conclusion of the examination, or the grant of consent. Notwithstanding the above, responses to the queries raised in the bullet points are provided below: • The purpose of paragraph 2.48.7 of draft NPS EN-3 is to standardise the approach to determining whether different types of generating station would be classified as NSIP under Section 15 of the Planning Act 2008. For the avoidance of doubt, paragraphs 1.4.1 and 1.4.2 of the Planning Statement Part 1 [APP-261] which refer to the Scheme substantially exceeding the 50 MW

			- Justifying the proposed lifetime of the consent with reference to 2.49.9 – 2.49.13. While this is not a determinative policy test, it is clearly relevant to the evaluation of landscape and other impacts against benefits. - Making clear, given the length of the consent over the typical 25 years envisioned by draft EN-3, whether there will be a substantial replacement of solar array equipment during the operational phase. Dependent on the scale of this operation it may be incorrect to scope out the assessment of operational impacts on themes such as Traffic and Transport and Socio-economics.	generation threshold for being considered an NSIP would be applicable whether considered in either Direct Current (DC) or Alternating Current (AC) terms. - Draft EN-3 provides no planning policy to support the time limitation of a draft DCO. Where the applicant chooses to offer a time-limited consent then this can be an important consideration for the Secretary of State. The Applicant is not proposing to substantially replace all solar PV equipment but instead is expecting the infrastructure to still be functional after 25 years due to improvements in the longevity of solar PV and maintenance techniques and hence has applied for a longer operational period. - Chapter 3: Scheme Description, of the Environmental Statement [APP-035] sets out at paragraph 3.2.4 that the operational life of the Scheme is 40 years. As set out by paragraph 6.3.23 of Chapter 6: Climate Change of the Environmental Statement [APP-038], an indicative solar PV module type has been considered, which would have a warranty covering the first 30 years. The paragraph goes on to explain that PV panel degradation over time (from 0-40 years) has also been factored into calculations for the performance of the Solar PV modules in assessing the climate change impact of the Scheme. It would not be an efficient use of resources to arbitrarily require the decommissioning of an operational solar farm after 25 years, which would be 15 years before the end of its design life and 5 years before the end of the warranty period for the solar PV arrays.

				In accordance with the above bullet-point, PV panel degradation over time (from 0-40 years) has also been factored into calculations for the performance of the Solar PV modules. No wholesale replacement of solar PV arrays is anticipated. In any case, the DCO application seeks authorisation to construct, operate and maintain the Sunnica Energy Farm. Article 2 of the draft DCO [APP-019] defines the meaning of "maintain" in the draft DCO. This sets out that the definition does not include removal, reconstruction or replacement of the whole of the authorised development. Article 5(3) of the draft Development Consent Order [APP-019] also sets out that the carrying out of any maintenance works which are likely to give rise to any materially new or materially different effects that have not been assessed in the Environmental Statement would not be authorised. Therefore, the substantial replacement of solar array equipment would not be authorised by the DCO if it would lead to any materially new or materially different effects to those assessed by the Environmental Statement, including operational impacts on themes such as Traffic and Transport and Socio-economics.
SCC-29	Heritage	Assessment	SCC now expect a full evaluation report which includes specialist reports, C14 dates etc. to be submitted into the Examination, and to SCC Archaeological Service for approval and inclusion in the Historic Environment Record (HER), before determination of the application.	Please see the response to SCC-20/SCC-21. The evaluation report submitted at Procedural Deadline A [PDA-002] will also be submitted for inclusion in the HER.
SCC-30	Heritage	Assessment	Dependent on the findings in the forthcoming full report, and observations during site monitoring visits, SCC may not need to object on archaeological grounds, as long as: the areas previously excluded from development or disturbance to secure	This comment is noted. A management plan will be created and will form part of the detailed Construction Environmental Management Plan to be prepared following the appointment of a contractor, prior to the start of works. The plan will detail the areas to be excluded, the construction methodology, the long-term management

			the survival of important archaeological remains (on the basis of the Geophysical Survey results) remain excluded, and the methodologies adopted for the creation of grassland on archaeologically sensitive sites are appropriate to achieve preservation in situ of buried archaeological remains. SCC's assessment of this will be provided within the LIR.	proposals, and any decommissioning phase. Table 3-2 in the Framework Construction Environment Management Plan [APP-123] contains outline details for the areas which have been removed from the developable area due to the presence of archaeology. The Landscape and Ecology Management Plan [APP-108] also contains further information. Information on the management of these sites during construction will also be set out within the Detailed Archaeological Mitigation Strategy (DAMS). A first draft will be submitted at Deadline 1 of the Examination. The methodology for archaeological mitigation will be proposed in the first draft of a DAMS to be submitted to the Examination following on-going engagement with SCC and CCC. The DAMS will propose the methodology for undertaking set piece excavations and any other mitigation where required. The DAMS will also include an Overarching Written Scheme of Investigation which will present an overview of all areas of proposed mitigation. Following SCC agreement of the draft DAMS, it is proposed that the appointed Archaeological Contractor produces a series of Site Specific WSI's (SSWSI) for individual mitigation areas, also to be agreed with SCC. If required, the appointed Archaeological Contractor may also produce individual Method Statements in response to the DAMS and individual SSWSIs.
SCC-31	Ecology	Assessment	SCC notes that important detail is still lacking from the Ecology and Nature Conservation chapter of the Environmental Statement [APP-040]. In particular, characterisation of some impacts is inadequate and the exclusion of certain ecological features from detailed assessment has not been justified. The detailed assessments fail to address all potential impacts and rely heavily on the Framework Construction Environment Management Plan (CEMP) [APP-123] and Landscape and Ecology	Potential impacts on ecological features during construction, operation and decommissioning are presented in section 8.7 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040]. Ecological features taken forward for detailed assessment is based on the criteria set out in paragraphs 8.4.26-8.4.32 and 8.6.17 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040].

			Management Plan (LEMP) [APP-108] for mitigation, which in themselves are lacking crucial details. Impacts should have been characterised and quantified wherever possible.	The Applicant would welcome the identification of what important detail is considered to be lacking from Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] including for which impacts the characterisation is said to be lacking and for which excluded ecological features detailed assessment has not been justified. The Framework Construction Environmental Management Plan (CEMP) [APP-123], Framework Operation Environmental Management Plan (OEMP) [APP-126] and Outline Landscape and Ecology Management Plan (OLEMP) [APP-108] will deliver the necessary mitigation measures and compensation.
SCC-32	Ecology	Assessment	There has been insufficient evidence of adherence to the Mitigation Hierarchy and SCC considers that further improvements to the design are required to follow the Mitigation Hierarchy by avoiding impacting upon important habitats and species, such as arable flora.	The Scheme has followed the mitigation hierarchy and sought to avoid impacts to protected species and priority habitats, where possible. For example, the Scheme has retained all areas of broad-leaved semi-natural woodland, semi-improved calcareous grassland and standing water (ponds and lakes). As such, the Scheme avoids impacts on roosting bats, Great Crested Newt, reptiles and breeding and wintering birds. With reference to Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040], important ecological features identified as part of the detailed baseline surveys are reported in Tables 8-4, 8-5, 8-6, 8-7 and 8-8. Section 8.8 sets out avoidance and mitigation measures for important ecological features, with an assessment of likely impacts and effects undertaken in section 8.9. As set out in paragraph 8.10.7 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] construction activities are predicted to result in the direct loss of arable habitats, supporting notable arable flora in their field margins (not across the whole fields). The following areas within the Order limits, where notable

				species were recorded, will be managed for arable plants (refer to the illustrative parameter plans (see Figures 3-1 and 3-2 of the Environmental Statement): Sunnica East Site B: 4 3x20m wide strips in field E30 and 4 3x10m wide strips in field E17/18 Sunnica West Site A: 3 3x10m wide strips in field W09. The creation and management of these plots is set out in paragraph 8.8.10 7 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] . This will protect the long-term future of arable flora across the Order limits.
SCC-33	Ecology	Mitigation	Detail is lacking on habitat creation proposals, for example how habitats to be created will link and form a nature network. Improvements to the riverine environment also do not appear to have been considered.	Appendix 10I, Landscape and Ecology Management Plan of the Environmental Statement [APP-108] sets out the rationale for habitat creation, including how it forms a coherent nature network. For example, paragraph 1.7.29 sets out how the Scheme will align with and contribute to Buglife's B-Lines project, providing landscape scale benefits for pollinators through increased habitat provision and connectivity. Annex C sets out the indicative grass mixes to be sown across the Scheme and grazing regimes for management. Areas designated for conservation grazing have been incorporated to link in with the B-Lines project through allowing diverse grasslands to establish and be managed for the benefit of pollinators. Further detail on these measures, including potential improvements to riverine environments and how habitat creation will link to form a coherent biodiversity network including their long-term management will be set out in the detailed LEMP to be approved by ECDC and WSC at the detailed design stage, if development consent is granted. It should be noted that whilst extensive in-channel enhancements aren't proposed, the undeveloped areas adjacent to watercourses, embedded within the Scheme design, will enhance and protect wildlife corridors along these riparian zones. In addition, the shift in land use away from arable and pig farming, has the potential to greatly improve the quality of watercourses, through reduced fertiliser and pesticide run-off. Stabilisation of the soil

				through the creation of permanent grasslands across the Scheme will also reduce sediment run-off.
SCC-34	Ecology	Mitigation	Insufficient detail is given regarding the mitigation measures and compensatory habitat upon which the conclusions of the impact assessment are hinged.	Detailed mitigation measures are clearly laid out in the LEMP [APP-108] . The Applicant would welcome the identification of what specifically is said to be lacking in terms of detail regarding the mitigation measures and compensatory habitat upon which the conclusions of the impact assessment rely.
SCC-35	Ecology	Assessment	It is unclear how the Applicant will ensure the survival of compensatory habitats beyond the 40-year life span of the project. If consideration is not made past the 40-year lifespan of the project, it is possible that there could be a net loss to biodiversity.	The Scheme will not remove landscape enhancements at the point of decommissioning and only the infrastructure elements of the Scheme would be removed, as set out in the Framework Decommissioning Environmental Management Plan [APP-125] . If after decommissioning, when the land is no longer under the control of the Applicant nor covered by this consent, a landowner decides to remove vegetation, this would be subject to applicable planning or licensing requirements as appropriate at that point in time.
SCC-36	Ecology	Biodiversity net gain	Further enhancements could be delivered within the scheme and should be explored; the Biodiversity Net Gain Assessment [APP-259] shows a reasonable attempt at achieving net gain, however further supporting information regarding the specifics of how this will be achieved is required. This includes full calculations which should be included as an appendix.	The Applicant acknowledges the Council's comments and these will be taken into consideration as part of an updated calculation of Biodiversity Net Gain which will provide the detail as requested for the calculations using the latest Biodiversity Net Gain metric 3.1. This will be communicated through a technical note which will include the information as required by stakeholders regarding calculations.
SCC-37	Ecology	Biodiversity net gain	On the face of it, considerable net gain should be easily achievable however there is insufficient evidence provided at this point. Evidence will also be required to show Biodiversity Net Gain is on top of compensation and mitigation to avoid double-counting.	The Biodiversity Net Gain Assessment [APP-259], using Defra's Biodiversity Metric 3.0, sets out the approach and evidence used in undertaking the calculations and avoids double counting. The Council's comments will be taken into consideration as part of an updated calculation of Biodiversity Net Gain which also include aspects such as follow up surveys for some habitats, all of which will be reported in a technical

				note which will be circulated to SCC. Putting these changes into perspective, it is expected the current calculation of a net gain of about 83% habitat units, 16% hedgerow units and 1% of river units will not change substantially.
SCC-38	Ecology	Mitigation	The Habitats Regulations Assessment (HRA) [APP-092] shows likely significant effects on Breckland Special Protection Area (SPA). The Appropriate Assessment includes proposed mitigation such as land for nesting and foraging Stone Curlew; SCC is awaiting Natural England's view as to whether these proposals are acceptable mitigation according to Habitats Regulation Assessment (HRA). It will be important to consider whether there is certainty over the effectiveness of the measures proposed and whether these proposals meet the criteria set out in Natural England's advice note 'Sourcing and managing mitigation land'.	This comment is noted. Details of the habitat creation and management is provided in Section 4 of the Offsetting Habitat Provision for Stone-Curlew Specification [APP-258] and Section 1.8 of the Landscape and Ecology Management Plan [APP-108] . The areas embedded for offsetting utilise the species' current and historical distribution across the Order limits and have been designed and will be delivered following what has been successful with the other similar habitat and nesting plots around the Breckland area. This has considered appropriate Natural England advice. Final agreement (i.e. allowing for development of the currently submitted specification post consent) on the detail of the plots is to be secured pursuant to an amendment to DCO Requirement 10 that will be brought forward at the earliest timetabled time for submission of an updated DCO at Examination.
bSCC-39	Water resources	Flood risk	As Lead Local Flood Authority, local knowledge indicates that there are not many areas of concern remaining at this stage and with a little more work SCC should be able to reach agreement with the Applicant.	This comment is noted.
SCC-40	Water resources	Flooding	Any locations within the order limits which are recorded to be within areas at risk of flooding from any source of flooding should be reviewed and the proposals designed to reflect the level of risk in accordance with the sequential approach. The national pluvial flood mapping has been recently updated and the flood risk assessment may need to be reviewed to reflect this.	This comment is noted and agreed. The update of the national pluvial flood mapping has been reviewed. The updated national pluvial flood mapping does not impact the current conclusions of the Flood Risk Assessment [AS-007 to AS-010] .
SCC-41	Construction	Drainage	The sustainable management of surface water should be considered for all sites both during	The proposed surface water drainage strategy is outlined within the Flood Risk Assessment – Part 4 [AS-010] , Annex

			the construction and, where applicable, the operational phases with runoff managed in accordance with the Construction Industry Research and Information Association (CIRIA) Sustainable Drainage Systems (SuDS) hierarchy. Following the completion of the construction phase, runoff from the area within the order limits should replicate the greenfield scenario.	F Drainage Technical Note. The use of SuDS features, swales and infiltration basins, is a key factor within the surface water drainage strategy in order to mimic existing conditions. Section 3.3 within the Flood Risk Assessment – Part 4 [AS-010] , Annex F Drainage Technical Note states that HR Wallingford's UK SuDS Greenfield Runoff Rate Estimation tool has been used to calculate the greenfield runoff rates for the site for a series of return periods. As stated within Section 3.4 of the Flood Risk Assessment – Part 4 [AS-010] , Annex F Drainage Technical Note, it is not intended to discharge surface water runoff off-site, over and above existing rates and volumes; betterment is sought to reduce overall volumes at peak times to reduce flood risk downstream. Surface water generated within the site will be disposed of via infiltration and natural overland flow to mimic existing conditions. SCC as LLFA will determine whether to approve the detailed drainage strategy for the Scheme, pursuant to Requirement 12 of the draft DCO [APP-019] .
SCC-42	Water resources	Design	Where the proposals lie within areas where aquifers, groundwater or water bodies are recorded to have a particular vulnerability to pollutants, then this must be given appropriate consideration within the designs.	The Scheme overlies the Chalk aquifer, a Principal aquifer, and is vulnerable to pollution. This is acknowledged in Chapter 9: Flood Risk, Drainage and Water Resources of the Environmental Statement [APP-041] . The risks to groundwater and surface water bodies for each of the sites are assessed within Section 9.8. With the embedded mitigation within the design and construction methodologies, the assessment concludes there are considered to be no significant effects from the construction and operation of the Scheme.
SCC-43	Water resources	Design	There are a significant number of Ordinary Watercourses within the project area for which measures will need to be taken to ensure any adverse impacts to them are minimised or eliminated entirely where possible.	The potential for adverse impacts on watercourses, both Main Rivers and ordinary watercourses, has been assessed within Chapter 9: Flood Risk, Drainage and Water Resources of the Environmental Statement [APP-041] . Section 9.7 details the embedded mitigation to be employed during construction of watercourse crossings, both via non-intrusive techniques (paragraphs 9.7.16 to 9.7.22) and intrusive techniques (paragraphs 9.7.23 to 9.7.28). No

				permanent above ground construction for the location of solar panels would take place within a 10m buffer from the edge of the typical channel / water's edge of watercourses. The assessment concludes that with the embedded mitigation (secured pursuant to the Framework CEMP [APP-123]) there would be no significant effects on surface watercourses within the area of the Scheme.
SCC-44	Water resources	Design	A surface water management plan (SWMP) has been undertaken for the Newmarket area, the findings of which should be incorporated into the design, such that the proposals do not adversely impact sensitive catchments.	The Newmarket Surface Water Management Plan (SWMP) (BMT, June 2019) covers the area of Newmarket and includes the Newmarket Brook. Newmarket Brook flows northwards through Newmarket to the River Snail. Areas of the Scheme are located close to the River Snail, and the river is crossed non-intrusively by the cable route. The Scheme does not result in any flow changes within the river, and as such there are no changes to propagate upstream to Newmarket, which is located approximately 2.5km south, and upstream from Sunnica West Site B. There is no impact from the SWMP to the site either.
SCC-45	Water resources	Design	Suffolk County Council have issued guidance on the sustainable management of surface water and flood risk with respect to development which should be reflected within the designs for the proposed works in the area under the jurisdiction of Suffolk County Council.	The proposed surface water drainage strategy is outlined within the Flood Risk Assessment – Part 4 [AS-010], Annex F Drainage Technical Note. Paragraph 3.1.1 states the proposed surface water drainage strategy for the Scheme is to mimic the natural drainage conditions of the site as much as possible following the SuDS principles of surface water drainage. Local policies and guidance have been reviewed through the process, and the SuDS principles in the Technical Note comply with them. SCC as LLFA will determine whether to approve the detailed drainage strategy for the Scheme pursuant to Requirement 12 of the draft DCO.
SCC-46	Water resources	Design	BRE365 compliant infiltration testing will be required in locations where infiltration features are to be located to support the designs.	As stated in the Flood Risk Assessment – Part 4 [AS-010], Annex F Drainage Technical Note, paragraph 3.1.1, detailed drainage designs and SuDS feature locations will be determined post consent at detailed design stage. The

				exact location of infiltration features will be confirmed post consent, with infiltration testing to be carried out to inform the detailed design stage. Within the Framework Construction Environmental Management Plan [APP-123] Table 3-10, it is stated that infiltration design will be in accordance with BRE365 and infrastructure will be placed at least 10m away from watercourses. SCC as LLFA will determine whether to approve the detailed drainage strategy for the Scheme pursuant to Requirement 12 of the draft DCO.
SCC-47	Water resources	Design	For locations on steep slopes or where overland flows of surface water are known to present issues locally, even if this hasn't been identified on national pluvial flood mapping, an allowance should be made for this within the location and design of (SuDS) features (e.g. including interception features to safely divert flows).	The land within the Order Limits is of gentle undulating nature. There are no areas of steep slopes within the Order limits. The local topography of the land within the Order limits will not be significantly altered. Locations of proposed swales are at natural low points to collect overland runoff from PV catchment sites and compound / BESS areas. SuDS features are located perpendicular to site contours, to provide an optimum solution to mitigate and reduce flood risk on site and elsewhere. Flows will not be diverted beyond existing routes and overland flows will naturally be intercepted by SuDS features to mitigate flood risk.
SCC-48	Water resources	Assessment	Exceedance flows should be identified on a plan demonstrating where water would travel should a rainfall event occur that was in excess of the design capacity of the network or in the event of a blockage or failure of the system. Exceedance flows should be mitigated where necessary (i.e. where they cannot be directed away from existing/proposed buildings).	As stated in the Flood Risk Assessment – Part 4 [AS-010] , Annex F Drainage Technical Note paragraph 3.1.3, detailed drainage plans will be developed at detailed design stage. These will include the exceedance flow routes, and level/gradient data. It is not considered feasible at this stage in the Scheme's development to provide this information. SCC as LLFA will determine whether to approve the detailed drainage strategy for the Scheme pursuant to Requirement 12 of the draft DCO [APP-019] .
SCC-49	Water resources	Design	Blue/Green corridors within the site must be protected both within the overall design and throughout the proposed works. A detailed	The application contains a Landscape Masterplan [APP-209 to APP-214] . This illustrates the location of development areas, and the buffers in place along blue and

			assessment of the topography and existing/proposed contours must be undertaken to establish the location and nature of the existing flow-paths. Any existing corridors must be retained or enhanced where possible.	green corridors. The green and blue infrastructure layout is secured within the DCO pursuant to the LEMP [APP-108]. Additionally, this is acknowledged within Chapter 9: Flood Risk, Drainage and Water Resources of the Environmental Statement [APP-041], Section 9.7, paragraph 9.7.42: no permanent above ground construction would take place within a 10m buffer from the edge of the typical channel / water's edge of watercourses. The panels will be offset from watercourses by a minimum of 10m from the edge of the typical channel / water's edge of watercourses. Existing flow regime is being maintained with no changes to ground levels, apart from the BESS area which will be directed to existing flow paths with appropriate attenuation. Furthermore, Appendix 9B of the Environmental Statement (Water Framework Directive Assessment) [APP-094] sets out in Section 6 opportunities for watercourse enhancements and states in paragraph 6.1.3 that "<i>The design of reinstatement proposals and enhancement opportunities will be undertaken during detailed design post-consent. This will be undertaken as part of a WFD Mitigation and Enhancement Strategy that is secured in the DCO through the Framework CEMP (provided in Appendix 16C of the Environmental Statement [APP-123]).</i>"
SCC-50	Landscape and visual amenity	Scale	In landscape terms Sunnica is set apart from other consented solar developments, including other NSIPs, by its scale and extent. This leads to significant landscape and visual issues.	The Scheme is similar in scale to several other proposed solar energy farms in the UK. The Landscape and Visual Impact Assessment (LVIA) set out in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] summarises the effects on the landscape in detail, from the national scale, through regional, county, district and neighbourhood scales to local landscape character areas defined by the Applicant. It is acknowledged that there will be broad-scale change to the character of the landscape at the site level and within parts of the Rolling Estate Chalklands landscape character

				type (LT) defined within the Suffolk Landscape Character Assessment 2010, within Appendix 10D of the Environmental Statement [APP-103]. Effects on some receptors would be significant at construction and year 1 of operation, reducing in the most part to not significant at year 15 of operation. Residual significant effects are predicted for some landscape receptors at year 15 of operation, particularly relating to intra project effects, as set out in Appendix 10G of the Environmental Statement [APP-106]. NPS EN-1 recognises that virtually all energy NSIPs will have effects on the landscape and that all proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites.
SCC-51	Landscape and visual amenity	Scale	Rather than being perceived as a solar development occupying an area of land within a wider landscape, Sunnica has the potential to dominate and transform the local landscape, to alter it beyond recognition, and thus to create a new landscape altogether.	The Scheme would not dominate and transform the local landscape to the extent that it would alter it beyond recognition. The Scheme is split into sites with substantial areas of predominantly intensively managed agricultural land between. It has been designed to retain the existing landscape pattern and features as far as possible and effects on landscape character will be localised. Whilst it is acknowledged that some key characteristics, such as openness, will change locally, the majority of key characteristics will be retained. For example, within the Rolling Estate Chalklands LT, the large uniform fields enclosed by low hawthorn hedges and shelter belt planting will be retained and the clustered villages with flint and thatch vernacular houses in villages will not be altered.
SCC-52	Operations	Operating life	While the adverse visual effects on communities may be justifiable in the short term to address the climate crisis, it is not justifiable to seek a consent that goes beyond the initial lifespan of the PV panels (approx. 25 years)	Paragraph 2.49.9 of draft NPS EN-3 acknowledges that the design life of solar panels can sometimes be longer than 30 years. Chapter 3, Scheme Description, of the Environmental Statement [APP-035] sets out at paragraph 3.2.4 c that the operational life of the Scheme is 40 years.

			without providing an opportunity to assess the policy merits of the proposal at that time. SCC considers that the proposed lifespan of the project of 40 years, and the consequent temporal accumulation of adverse effects, is not reasonable and appropriate considering that the need is to deliver Net Zero by 2050, and decarbonise the Grid by 2035.	As set out by paragraph 6.3.23 of ES Chapter 6, Climate Change of the Environmental Statement [APP-038], an indicative solar PV module type has been considered, which would have a warranty covering the first 30 years. The paragraph goes on to explain that PV panel degradation over time (from 0-40 years) has also been factored into calculations for the performance of the Solar PV modules in assessing the climate change impact of the Scheme. It would not be an efficient use of resources to arbitrarily require the decommissioning of an operational solar farm after 25 years, which would be 15 years before the end of its design life and 5 years before the end of the warranty period for the solar PV arrays. The need for a net zero electricity grid and economy will not end once targets for delivery of a net zero electricity grid by 2035 and economy by 2050 are initially achieved. In addition, the Applicant considers that the Scheme should be considered in the context of policy as it exists at the point the application is submitted and the decision is taken. It is not considered reasonable to consider the merits of the scheme in the context of unknown possible policy changes in future years.
SCC-53	Landscape and visual amenity	Design	The fragmented layout of the proposals, located amidst and around several settlements, has the potential to impact on local character to such an extent as to affect the sense of place, and the place attachment of the residents, of the affected villages and communities. Many residents will experience the adverse visual and perceptual effects of various elements of the solar farm as part of their daily routines.	The landscape within the study area is the product of centuries of increasingly intense agricultural expansion and development. It is, by design, a productive landscape. A detailed assessment of landscape character has considered the likely effects of the Scheme on the landscape at different scales. Most of the area is under intensive arable production with some areas of pasture around village edges and is interspersed with other uses such as settlement, large-scale free range pig farming and quarrying. In the southern part of the study area, the horse racing industry has transformed the landscape with extensive, manicured training areas and associated facilities. Important areas for

				nature and historic conservation are recognised as islands within the agricultural landscape. The Scheme is large and to mitigate this it has been designed as a series of discrete sites separated by substantial areas of largely intensively managed agricultural land and offsets from settlement edges. The landscape on the fringes of these settlements, which is not proposed to include above ground infrastructure related to the Scheme, tends to be more intricate than the surrounding arable land, with smaller fields defined by mature vegetation and well vegetated gardens. This, together with tree and shrub and hedgerow planting proposed as part of the masterplan for the Scheme, will maintain the sense of place and place attachment of residents. Several settlements are located in the study area defined within Chapter 10: Landscape and Visual Effects of the Environmental Statement [APP-042]. Worlington – This small village, centred on The Street, is the closest to proposed solar farm infrastructure within Sunnica East Site B. The nearest area of solar panels (parcel E24) would be located 220m from the property of Queens Hill, on the southern edge of the village. Chalk grassland and a belt of woodland is proposed between the southern edge of the village and the solar panel arrays. Parcels E26 and E27 would be located approximately 200m south of the club house of the Royal Worlington and Newmarket Golf Club, which is surrounded by dense vegetation and beyond shelter belts which would enclose the Scheme. On the western edge of the village, solar farm development within parcel E12 would be located approximately 270m south of the closest property, beyond an area of open land currently used for free range pig farming. This open edge would be retained by an extensive area of grassland (ECO3).

				In summary, proposed offsets, the density of existing and proposed vegetation would limit perception of the Scheme and the potential effects on the setting of the settlement. • Red Lodge – This is a largely post-war settlement, centred on Warren Road. The closest part of the Scheme would be parcel E21 of Sunnica East Site B, located approximately 450m west of Red Lodge, beyond the busy A11 trunk road and industrial development on Bridge End Road. The sense of place and place attachment of residents will not be affected. • Freckenham – The closest area of solar panels to this village would be parcel E05 in Sunnica East, approximately 1.2km to the north, with native grassland within ECO 1 and ECO 2 and several belts of existing and proposed vegetation in between on boundaries of fields in the largely flat landscape. The sense of place and place attachment of residents will not be affected. • Isleham – Solar panels would be located approximately 500m from the southeastern corner of the village in parcel E05 of Sunnica East, beyond intervening arable land. A belt of woodland is proposed to enclose and screen the structures. Solar panels in parcels EE01 and E03 would be located approximately 1.2km from the eastern edge of the village, beyond Lee Brook, which is not perceptible due to intervening vegetation in the flat landscape. • West Row – The southern edge of this small village would be located approximately 700m from the closest area of solar panels to the southwest located in parcel E02 of Sunnica East. The Scheme would lie beyond the well-vegetated River Lark. • Fordham – The closest area of solar panels to Fordham would be parcels W01 and W02 of

				Sunnica West, approximately 1.km south of the settlement and located to the east of Snailwell. There is substantial woodland and other mature vegetation in the intervening landscape, such that the Scheme will not affects its setting or character. • Chippenham – This small village lies to the north of Chippenham Park and Gardens. The closest part of the Sunnica East Site B would be parcel E19, approximately 2km to the northeast. The closest part of Sunnica West would be approximately 1.6km south, beyond Chippenham Park and Gardens. The sense of place and place attachment of residents will not be affected. • Snailwell – The hamlet of Snailwell would be located approximately 260m west of the closest area of solar panels in parcel W03 of Sunnica West, enclosed by proposed woodland planting and screened by intervening vegetation and rising land. There would also be solar panels in parcel W02 to the north, beyond an existing belt of mature trees. The sense of place and place attachment of residents will not be affected. • Burwell – If Option 2 for connecting the Scheme to the national electricity transmission system were to proceed, the proposed substation at Burwell would be located adjacent to and in the context of the existing substation approximately 300m to the west. The fields on the western side of the village are small and defined by tree lines and dense hedgerows, creating physical separation from the sub-station. In summary, it is acknowledged that the scale of the Scheme is large. The layout, across discrete sites within Sunnica A and Sunnica B, is intentional. The Scheme has been designed to avoid development within or directly on the boundaries of existing settlement and to retain

				separation between settlements and the wider landscape. Significant effects on the sense of place and place attachment of residents of settlements is not likely. The Applicant has been undertaking further discussions with SCC to explain how the design and mitigation proposals have developed over time to account for key areas of impact.
SCC-54	Human health	Quality of life	In its entirety the scheme is likely to adversely affect the residents' quality of life, contrary to the Design Principles of the National Infrastructure Commission.	Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] and associated appendices [APP-100 to APP-108] provide a thorough and detailed assessment of the likely effects of the Scheme on visual receptors (people). This assessment considered the likely effects on visual receptors with reference to 59 viewpoints. This assessment concluded that the visual effects relating to Sunnica East Site A would range between negligible adverse and minor adverse and for Sunnica East Site B would range between neutral and minor adverse at year 15 of operation. For Sunnica West Site A, moderate adverse effects are predicted for VP38 Recreational users and users of the training grounds at the Limekilns. Effects on all other visual receptors relating to Sunnica West Site A would not be significant by year 15 of operation. For Sunnica West Site B, visual effects at year 15 of operation are predicted to range between neutral and negligible adverse. The assessment concluded that due to the distance between the various parts of the Scheme, i.e. between Sunnica East Site A and Sunnica East Site B, none of the identified visual receptors would have views across the Scheme in its entirety at year 15 and no combined significant adverse visual effects have been identified. The Socio-economics and Human Health assessments in Chapter 12: Socio-economics and Land Use of the Environmental Statement [APP-044] do not directly assess quality of life but it is possible to infer conclusions from the

				findings. The beneficial and adverse effects that are related to quality of life have been compiled for both the construction and decommissioning phases, and the operating phase. The construction and decommissioning phases will result in temporary effects that could impact quality of life. Chapter 12: Socio-economics and Land Use of the Environmental Statement [APP-044] identifies beneficial effects including benefits to the local economy through the creation of construction employment and related Gross Value Added (GVA). Chapter 15: Human Health of the Environmental Statement [APP-047] identifies beneficial effects including the provision of access to local employment and training opportunities, as well as opportunities for work for local people via local procurement arrangements. Chapter 12: Socio-economics and Land Use of the Environmental Statement [APP-044] also identifies adverse effects that could impact quality of life, including impacts to users of PRowS, some of which require temporary closures and diversions during the construction and decommissioning phase. Chapter 15: Human Health of the Environmental Statement [APP-047] identifies adverse effects on accessibility and active travel, and for connection of existing communities, both as a result of the temporary PRowS closures and diversions during the construction and decommissioning phases. The operation stage features permanent effects that will be relevant to quality of life. Chapter 12: Socio-economics and Land Use of the Environmental Statement [APP-044] identifies beneficial effects including benefits to the local economy through the creation of operational employment and related GVA. There will also be new permissive paths created as a result of the Scheme, which can have a quality of life benefit for users. Chapter 15: Human Health of the Environmental Statement [APP-047] identifies beneficial

				effects including opportunities for work for local people via local procurement arrangements, as well as benefits for accessibility and active travel, and the connection of existing communities, both as a result of the new permissive routes.
SCC-55	Other	Cumulative effects	The intra- and inter-cumulative, and sequential effects, on landscape character and on recreational and transport users of highways, Public Rights of Way, promoted and cycle routes will need to be fully explored and minimised.	Effects on the landscape as a resource in its own right and effects on people's views of the landscape have been considered separately in line with best practice. Intra project effects, including changes to how the landscape is experienced from routes (highways, PRowS and others), including sequential effects and cumulative effects have been considered in detail in Chapter 10, Landscape and Visual Amenity of the Environmental Statement [APP-042] and associated appendices and avoided or minimised through the iterative design process. This provides a detailed assessment of landscape and visual effects on each receptor in relation to each site within the Scheme and also the Scheme as a whole. This allows distinctions to be drawn between the impacts which would arise from separate parts of the Scheme and intra-project effects which would arise from the Scheme as a whole. The scheme has been designed to minimise the number and duration of Public Rights of Way (PRow) closures. The proposed closure of eight PRowS are outlined within Chapter 13, Transport and Access of the Environmental Statement [APP-045] and Traffic Regulation Measures Plans - Road Closures [APP-009 to APP-011] . The closure of the PRowS are expected to be no more than three weeks, which is considered a worst-case scenario and therefore not considered to have a significant or long-term impact. The closures cannot be programmed at this stage of the project, but it is likely that, due to their purpose, they will not occur simultaneously and will therefore have isolated, rather than cumulative, impacts. Regarding the impact the site accesses have on landscaping, the initial site access review identified the vegetation

				removed/trimming required to accommodate the full visibility splay requirements based on the speed limit of the highway (e.g., 60mph/100kph = 215m visibility splay). Therefore, the site access strategy was developed to include temporary speed reductions and temporary traffic signals to substantially reduce the amount of vegetation to be removed/trimmed as embedded mitigation.
SCC-56	Landscape and visual amenity	Visual representations	Concerns remain with regards to the visualisation of the visual effects of the scheme, and some judgements made as part of the landscape and visual assessment process.	The visualisations for the Scheme have been prepared in line with best practice, including Landscape Institute Technical Guide Note 06/19. The methodology setting out the approach is provided in Appendix 10C: Landscape and Visual Impact Assessment Methodology [APP-102] . Judgements made in relation to likely visual effects of the Scheme have been considered in detail and made with reference to the methodology and minimised through the iterative design process.
SCC-57	Landscape and visual amenity	Road improvements	Elements of the scheme, such as proposed road improvements, within settlements and in the countryside, have not been included in the Landscape and Visual Assessment (LVIA) [APP042] , despite their potential to have adverse effects (such as urbanisation, loss of vegetation and visual amenity) in the rural landscape.	All aspects of the Scheme relevant to landscape and visual effects have been considered in the Landscape and Visual Impact Assessment summarised in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] . This includes the mitigation for other topics set out in the Schedule of Environmental Mitigation [APP-257] . Road improvements proposed are minor and localised and have been designed to minimise landscape and visual impacts in line with the principles set out in the Design and Access Statement [APP-264] .
SCC-58	Landscape and visual amenity	Visual representations	Visual receptors do not reflect previous requests by SCC to demonstrate the impact for other users of the Public Right of Way U6006. Visual impact height remains at 1.6 metres and additional height not included as previously requested. This does not give a true impact for all users, included increased height for equestrian use. (APP 216, viewpoints 15 to 16).	Impacts on users of U6006 have been assessed in detail with reference to four viewpoints (15, 15A, 15B, 16) representing sequential views along the route. It is considered that these viewpoints provide a range of views sufficient to support the written descriptions of the baseline and predicted changes. As explained in paragraph 2.1.6 of Appendix 10C: Landscape and Visual Impact Assessment Methodology [APP-102] , "as part of the fieldwork, visual analysis was also made in relation to horse riders on routes which they were considered to use, e.g. U6006 between Elms Road

				<i>and Worlington. In order to note their views (given the additional height of horse riders) the assessors stood on a step ladder. The photography from these locations has been taken from a person's eye height as standing on the ground, to represent a pedestrian, as these were considered the more representative user of the routes."</i> Therefore, because the assessor stood on a step ladder at the locations of the relevant viewpoints, the impacts on horse riders using equestrian routes has been considered with respect to their elevated position above the landscape. A further set of Zones of Theoretical Visibility (ZTVs) have been prepared to illustrate the likely extent of views of horse riders based on an eye height of 2.7m above ground level (Appendix C of this Relevant Representation response document). A comparison between these ZTVs and those representing the eye height of pedestrians (1.7m above ground level) demonstrate very little difference in the theoretical extent of visibility.
SCC-59	Landscape and visual amenity	Cumulative effects	Cumulative effects with other schemes (see section 10.11 of [APP-042]) do not appear to be fully integrated within the assessments of landscape and visual effects.	The assessment of cumulative landscape and visual effects is set out in section 10 of Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042]. It is based on the 'combined' impacts and effects of the Scheme with the cumulative schemes set out in Appendix 5A of the Environmental Statement [APP-055] and is separate from the assessment of the landscape and visual effects of the Scheme in isolation. This is common practice to draw clear distinctions. Regarding North Angle Solar Farm (CCC/20/051/FUL and CCC/21/237/VAR), this scheme lies to the west of Soham and outside of the study area defined for the LVIA. It was therefore scoped out of the assessment of likely cumulative landscape and visual effects presented in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042].

				An assessment of the cumulative effects of the proposed Breach Solar Farm (21/00706/ESF) has now been made and is included in Appendix A of this Relevant Representations response document. It concludes that there would be moderate adverse cumulative effects on local landscape character area (LLCA) 36: Burwell Fen during construction, which are considered significant. These effects would be short term and temporary. Effects during operation and decommissioning would not be significant.
SCC-60	Landscape and visual amenity	Cumulative effects	Given the scale of the proposal, and the consequent accumulation of non-significant effects, it will be essential to address and minimise these as far as possible, as in-combination non-significant repeated or sequential visual effects will become significant.	Effects on the landscape as a resource in its own right and effects on people's views of the landscape have been considered separately in line with best practice. Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] and associated appendices provides a detailed assessment of landscape and visual effects on each receptor. This includes an assessment of landscape effects at different scales and on sequential views from roads and public rights of way, which have been assessed with reference to representative viewpoints. Mitigation, including offsets and planting, has been proposed to address and minimise adverse effects (whether significant or non-significant) on the character of the landscape experienced along the route and views of the landscape. This is in line with the agreed methodology and the proportional approach advocated by the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition.
SCC-61	Operations	Operating life	It is understood by SCC that shortening the life of the project may not be a viable prospect. In this case, it is our view that the additional accumulation of impacts of the longer period may require careful balancing and mitigation beyond the basic expectations of the draft policy.	The Applicant does not agree that the proposed duration of the Scheme is “<i>beyond the basic expectations of the draft policy</i>”. Paragraph 2.49.9 of draft NPS EN-3 acknowledges that the design life of solar panels can sometimes be longer than 30 years. It goes on to state that “<i>Applicants may apply for consent for a specified period, based on the design life of the panels.</i>”

				Chapter 3, Scheme Description, of the Environmental Statement [APP-035] sets out at paragraph 3.2.4 c that the operational life of the Scheme is 40 years. In accordance with Paragraph 2.49.9 of draft NPS EN-3, the Applicant is seeking consent for the design life of the Scheme. As set out by paragraph 6.3.23 of Chapter 6: Climate Change of the Environmental Statement [APP-038], an indicative solar PV module type has been considered, which would have a warranty covering the first 30 years. The paragraph goes on to explain that PV panel degradation over time (from 0-40 years) has also been factored into calculations for the performance of the Solar PV modules in assessing the climate change impact of the Scheme. It would not be an efficient use of resources to arbitrarily require the decommissioning of an operational solar farm after 25 years, which would be 15 years before the end of its design life and 5 years before the end of the warranty period for the solar PV arrays. In accordance with the above paragraph, PV panel degradation over time (from 0-40 years) has also been factored in to calculations for the performance of the Solar PV modules. No wholesale replacement of solar PV arrays is anticipated. In any case, the DCO application seeks authorisation to construct, operate and maintain the Sunnica Energy Farm. Article 2 of the draft DCO [APP-019] defines the meaning of “maintain” in the draft DCO. This sets out that the definition does not include removal, reconstruction or replacement of the whole of the authorised development. Article 5(3) of the draft DCO [APP-019] also sets out that the carrying out of any maintenance works which are likely to give rise to any materially new or materially different effects that have not been assessed in the Environmental Statement would not be authorised. Therefore, the substantial replacement of solar array equipment would not be authorised by the DCO if it would lead to any materially new or materially different

				effects to those assessed by the Environmental Statement, including operational impacts on themes such as Traffic and Transport and Socio-economics.
SCC-62	Landscape and visual amenity	Visual impact	The aim for landscape design and mitigation should be to retain the legibility and character of the landscape and, ideally, to reduce the visual effects to zero, where possible, especially for visual receptors, at the edges of settlements, and along routes connecting settlements.	The aim of the landscape design and mitigation has been to retain the legibility of the landscape and to avoid (i.e. reduce to zero) or otherwise minimise adverse impacts on its character and views of the landscape. This has been achieved by offsetting development from settlement boundaries, road and public rights of way, retaining existing vegetation within and on the boundaries of the site and reinforcing the Green Infrastructure through additional planting which reflects the character of the landscape, as shown in the Landscape Masterplans presented in Figures 10 – 14a to 10-14f of the Environmental Statement [APP-209 to APP-214] . The vision and design principles for the landscape design are set out in the Landscape and Ecology Management Plan [APP-108] and the Design and Access Statement [APP-264] . Visual materials, including the photomontages are presented in Figures 10-20a to 10-102 of the Environmental Statement [APP-215 to APP-232] .
SCC-63	Landscape and visual amenity	Design	As the mitigation must be appropriate to the local landscape character, it may not be possible to screen the solar panels from all visual receptors. For these areas positive place making is required and the Applicant needs to provide innovative design solutions which demonstrate that, although the panel arrays may be visible, they sit well within the landscape, are not dominant or too prominent, and do not detract significantly from it.	The Landscape and Visual Impact Assessment presented in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] , read alongside the visual baseline presented in Appendix 10F of the Environmental Statement [APP-105] and the detailed assessment of visual effects presented in Appendix 10H of the Environmental Statement [APP-107] identifies locations where there would be views of solar panels and other structures. The aim of the landscape design and mitigation has been to retain the legibility of the landscape and to avoid (i.e. reduce to zero) or otherwise minimise adverse impacts on its character and views of the landscape. This has been achieved wherever possible by offsetting development from settlement boundaries, road and public rights of way, retaining existing vegetation within and on the boundaries of the site and reinforcing the Green

				Infrastructure through additional planting which reflects the character of the landscape, as shown in the Landscape Masterplans presented in Figures 10 – 14a to 10-14f of the Environmental Statement [APP-209 to APP-214]. This means that, even where solar panel arrays are visible, they will generally be at a distance from the viewer and in the context of retained vegetation and proposed planting, minimising the scale of impacts. The vision and design principles for the landscape design are set out in the Landscape and Ecology Management Plan [APP-108] and the Design and Access Statement [APP-264]. Visual materials, including the photomontages presented in Figures 10-20a to 10-102 of the Environmental Statement [APP-215 to APP-232].
SCC-64	Landscape and visual amenity	Mitigation	We consider that additional tree and hedgerow planting, including along some internal field boundaries, will be required to break up and soften views across large extents of solar panels in a number of locations.	Mitigation, including offsets and planting, has been proposed to address and minimise adverse effects on the character of the landscape and views of the landscape. This is in line with the agreed methodology and the proportional approach advocated by the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition. The design has responded to comments made by stakeholders through the statutory consultation process and meetings held with local planning authorities through the pre-application stage. The Applicant would welcome further suggestions about specific measures that are considered necessary (and evidenced).
SCC-65	Landscape and visual amenity	Mitigation	The required mitigation to make the proposals acceptable in landscape terms will need to be integrated and compatible with any the aims of mitigation for ecology, cultural heritage, and well-designed public access.	The Landscape and Ecology Management Plan [APP-108] has been prepared jointly with inputs from landscape, ecology and cultural heritage. The final document ensures that all mitigation design is acceptable with regard to potential impacts on these disciplines. This includes the avoidance of sensitive areas, including the scheduled round barrows at Chippenham and design which enhances the significance of the Registered Park and Garden at Chippenham Park, designated sites for biodiversity and protected and notable species and habitats. These disciplines will also be able to be considered by SCC in approving the detailed LEMPs.

				The visual impact on users of the PRoW has been assessed and is documented within the Landscape and Visual Impact Assessment presented in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042]. The residual effect on these recreational users is not considered to be significant. There are eight PRoWs which are required to be temporarily closed for a short-term period during the construction phase. The closures are expected to be for a maximum of three weeks which is expected to be a worst-case scenario. Each of the short-term temporary closure of the PRoWs will occur at different stages therefore each will be impacted on separately at differing stages of the construction. The PRoW closures are discussed and outlined in the Framework Construction Traffic Management Plan and Travel Plan (Framework CTMP & TP) [APP-118] and in the Traffic Regulation Measures Plans – Temporary Road Closures plans [APP-009, APP-010, APP-011].
SCC-66	Landscape and visual amenity	Design	The network of existing environmental features should be retained and enhanced as part of the vision in the Landscape and Ecology Management Plan (LEMP) [APP-108], along with new features that are required and proposed by that plan. Together these will form the framework in which the development will sit.	The LEMP [APP-108] retains, enhances and manages existing features and proposes new features as part of the Scheme. Further detail on these measures and how habitat creation will link to form a coherent biodiversity network including their long term management will be set out in the detailed LEMP to be approved by ECDC and WSC at the detailed design stage.
SCC-67	Landscape and visual amenity	Mitigation	A key component in the success or otherwise, of the project's Green Infrastructure will be effective management, in the short and long term, and this should be part of the LEMP vision. Inconsistencies within the Environmental Statement (ES) with regards to the retention of the gained Green Infrastructure post decommission, create uncertainty.	The Landscape and Ecology Management Plan [APP-108] submitted with the application sets out the framework for the management and maintenance of existing and proposed Green Infrastructure within the Scheme. This addresses each landscape element type separately, setting out the initial maintenance that will be carried out to establish new habitats and long-term management of existing and proposed vegetation.

				The vision and principles for the proposed Green Infrastructure are set out in the Landscape and Ecology Management Plan [APP-108] and it is not proposed that GI will be removed at decommissioning. If after decommissioning a landowner decides to remove vegetation, this would be subject to applicable planning or licensing requirements.
SCC-68	Landscape and visual amenity	Mitigation	If the intention is for the proposed Green Infrastructure to reflect the surrounding landscape character and context, this should be part of the overall LEMP vision.	As stated in paragraph 1.3.2 of the Landscape and Ecology Management Plan [APP-108], the Plan has been developed to ensure that the Scheme would reflect the existing landscape character and context, whilst accommodating mitigation principles established within the Environmental Statement. This has been a key consideration throughout the iterative assessment and design process and is linked to the review of published landscape character assessments and the definition of local landscape character areas (LLCA) by the Applicant, as set out in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042].
SCC-69	Landscape and visual amenity	Mitigation	Landscape proposals should be tailored to the location, and conditions and required functions of each site, noting that these change across the DCO site. Therefore, specific design solutions and management prescriptions will be required. The current proposals (as set out in the LEMP) do not seem to embrace this approach sufficiently.	As stated in paragraph 1.3.2 of the Landscape and Ecology Management Plan [APP-108], the Plan has been developed to ensure that the Scheme would reflect the existing landscape character and context, whilst accommodating mitigation principles established within the ES. This has been a key consideration throughout the iterative assessment and design process and is linked to the review of published landscape character assessments and the definition of local landscape character areas (LLCA) by the Applicant, as set out in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042]. An example within Suffolk is the setbacks and planting proposed along the route of U6006 south of Worlington. This Landscape and Ecology Management Plan [APP-108] is outline and is intended to be further developed post-consent for approval by the local planning authority. Paragraph 1.1.4 states that <i>"this OLEMP provides a</i>

				<i>framework for achieving the 'vision' of the Landscaping Masterplan, as illustrated on Figures 1 to 6, in Annex A. Detailed landscaping and ecological management plans will be approved by the relevant local planning authority and will be required to be in accordance with this OLEMP".</i>
SCC-70	Landscape and visual amenity	Mitigation	The continued lack of relevant detail (for example, with regards to the spatial arrangement of various components of infrastructure in each parcel; the quantification of vegetation losses; the consideration of required visibility splays for access points and their impact on roadside trees and hedges; the design of access points; etc.) does not promote the full and clear understanding of the landscape and visual effects of the proposals.	The Application documents provide sufficient detail to make full and clear judgements on the likely landscape and visual effects of the Scheme. The spatial arrangement of various components of infrastructure in each parcel is shown on the Parameter Plans in Figure 3-1 of the Environmental Statement for Sunnica East [APP-135] and Figure 3-2 of the Environmental Statement for Sunnica West [APP-136]. These should be read alongside other figures in the Application, which provide details on the design and arrangement of individual elements [APP-137 to APP-161]. The Biodiversity Net Gain Assessment [APP-259] and the Tree Constraints Report [APP-101] provide information on changes in existing habitats as a consequence of the Scheme. See response SCC-55, SCC-117 and SCC-118 regarding visibility splay considerations. Where access points and visibility splays are a requirement, detailed tree survey input would inform the volume of tree removals required and the safety of those trees. This will be secured pursuant to amendments to the DCO (to make vegetation removal under the definition of 'permitted preliminary works' to require a LEMP for those works) to be brought forward in the next update of the DCO to be submitted to Examination.
SCC-71	Land use	Assessment	The socio-economic assessment [APP-044] fails to correctly assess the likely effects of the project proposal on socioeconomics, and all conclusions with regards to impacts and effects of the scheme presented to date are therefore	The employment and socio-economic benefits of the Scheme are as reported in Chapter 12: Socio-economics and Land Use of the Environmental Statement [APP-044]. This reports that there is a significant temporary beneficial effect arising from the generation of construction and decommissioning employment and from the associated increase in gross value added (GVA) during construction

			inadequately supported by the available evidence presented as part of the application.	and decommissioning respectively. The Applicant considers that the approach taken to the modelling underpinning assessment of construction employment generation presented in the chapter is considered to be acceptable and robust, as it is based on good practice guidance (HCA Additionality Guidance) and sources such as published reports (CEBR, Centre for Economics and Business Research). The conclusions of the assessment are considered to be sound both based on this and on previous experience. The Applicant is engaging with SCC to try and address its concerns with Sunnica's assessment. It will update the examination in due course once these discussions have been progressed further.
SCC-72	Land use	Assessment	SCC has significant concerns with how the Applicant has modelled their labour assumptions, and their use of ready reckoners taken from the Homes and Communities Agency (HCA) Additionality Guidance. The use of these ready reckoners implies a misunderstanding of correct modelling principles.	The Applicant considers that the approach taken to the modelling underpinning assessment of construction employment generation presented in the chapter is considered to be acceptable and robust, as it is based on good practice guidance (HCA Additionality Guidance) and sources such as published reports (CEBR, Centre for Economics and Business Research).
SCC-73	Land use	Assessment	In their labour modelling the Applicant has assumed that 100% of the workforce needed to deliver this project is available within a 45-minute travel time of the site and then further compounded this error through the assumption that all indirect and induced benefit will also occur within the same 45-minute travel zone. This would only be true if the entirety of the supply chain needed to deliver this project is located within the travel study area, which is highly unlikely.	The modelling including in Chapter 12: Socio-economics and Land Use in the ES [APP-044] does not assume 100% of the labour will come from the 45-minute travel area. The calculations take into account estimated leakage of 12%, resulting in an assumption of 88% of labour coming from within the 45-minute travel area. The Applicant considers that the approach taken to the modelling of this as presented in the chapter is considered to be acceptable, as it is based on good practice guidance (HCA Additionality Guidance) and sources such as published reports (such as from CEBR, Centre for Economic and Business Research). The Applicant is engaging with SCC to try and address its concerns with Sunnica's assessment. It will update the

				examination in due course once these discussions have been progressed further.
SCC-74	Land use	Assessment	SCC expects the Applicant to identify the different skills required across their total workforce, and then the propensity and flexibility of the labour market within the 45-minute travel study area to fill these identified roles. Until the Applicant has done this very basic work, to understand where their prospective workforce is likely to come from, the effect of any conclusions reached for socio-economics, transport, accommodation, healthcare services, local amenities, businesses and residents, are completely flawed and therefore should be disregarded.	The Applicant considers that the approach taken to the definition of a study area and the labour market underpinning assessment of construction employment generation presented in Chapter 12: Socio-economics and Land Use of the Environmental Statement [APP-044] is considered to be appropriate as it is based on good practice guidance (HCA Additionality Guidance). The conclusions of the assessment are considered to be sound both on this basis and previous experience. The Applicant is engaging with SCC to try and address its concerns with Sunnica's assessment. It will update the examination in due course once these discussions have been progressed further.
SCC-75	Land use	Agricultural land classification data	Concerns have been raised by the local community in relation to the applicant's assessment of Agricultural Land Classification for the scheme. Suffolk County Council has not to date been able to provide a detailed critique of the assessment owing to a lack of in-house expertise. However, the issue is relevant to national policy as set out in NPS EN-1 and SCC would therefore be keen for these concerns it to be explored and resolved during the examination.	The Applicant has submitted a detailed ALC assessment [APP-238] [APP-239] that follows the recommendations given by Natural England in TIN049. This assessment includes work by two previous survey teams, one for the consented minerals site and work by the former MAFF ALC survey team. Natural England provide ALC expertise to planning authorities. The National Policy Statement for Energy EN-1 para 5.10.15 states "<i>The [Secretary of State] should ensure that applicants do not site their scheme on the best and most versatile agricultural land without justification. It should give little weight to the loss of poorer quality agricultural land (in grades 3b, 4 and 5), except in areas (such as uplands) where particular agricultural practices may themselves contribute to the quality and character of the environment or the local economy.</i>" <i>Para 5.10.8 states "Applicants should seek to minimise impacts on the best and most versatile agricultural land</i>

				<i>(defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5) except where this would be inconsistent with other sustainability considerations."</i> In addition, NPS EN-1 paragraph 5.10.15 states that the decision maker "...should give little weight to the loss of poorer quality agricultural land (in grades 3b, 4 and 5)...". This is reaffirmed by paragraph 5.11.14 of draft NPS EN-1 which preserves the existing guidance of EN-1 para 5.10.15 as given above. Draft NPS EN3 para 2.48.13 also recommends that ground mounted solar should avoid the best and most versatile cropland where possible, but also concludes "However, land type should not be a predominating factor in determining the suitability of the site location." ALC assessment work for the Scheme has been undertaken in accordance with the available guidance by suitably qualified experts. This assessment work shows that the site is predominantly in ALC Grades 3b and 4, with only a marginal area (less than 4%) of Grade 3a land, the lowest quality of agricultural land considered to be Best and Most Versatile. This Grade 3a land resource will not be lost as the development consent is temporary, with land continuing in agricultural use through the operational period of the development. With only a marginal extent of best and most versatile land the selection of the site has minimised the use of best and most versatile land. This temporary use of a small area of Grade 3a land should be considered against other sustainability considerations such as the need to rapidly displace fossil fuel use. Suffolk County Council does not need in-house expertise on ALC as it can draw upon the technical expertise provided by

				Natural England. In the absence of any concern from Natural England regarding the ALC assessment, Suffolk County Council should note the above National Policy Statement guidance and give little weight to the loss of poorer quality agricultural land.
SCC-76	Transport and access	Consultation	Consultation by the Applicant on transport matters has been minimal. SCC disputes the numerous references (e.g. in the Consultation Report [APP-030]) claiming that the Applicant has continued to engage with the host authorities.	The Applicant respectfully disagrees. Pre-PEIR consultation was undertaken with both LHAs for the PEIR (July 2019). Post-PEIR and pre-Environmental Statement, two meetings were held with the LHAs (March & August 2021) and an additional meeting held with National Highways (May 2021) which identified the approach for the Environmental Statement. Further consultation was undertaken via email correspondence with SCC regarding specific topics such as the use of the Newmarket Road/Worlington Road Junction (October 2021). In addition, the site access on Golf Links Road has been relocated based on consultation feedback. The Applicant is looking to continue to engage with the LHA through the SoCG and the Examination process.
SCC-77	Transport and access	Consultation	The four authorities provided a detailed response to the PEIR. However, many of the issues raised in this have not satisfactorily been addressed by the Applicant. In some cases SCC's response has been taken out of context and presented as showing that SCC had agreed the method of assessing environmental impacts [APP-030].	It is unclear which responses are in question, further clarification is required as this is not the intention of the Applicant to take a response out of context. However, if there are particular responses in question then the Applicant seeks to agree on the way forward with dealing with the comment.
SCC-78	Transport and access	Consultation	During the initial review of the submitted documents SCC has identified shortcomings in the content that made them inadequate for evaluating the impact of this project on the transport network. Regrettably, the Applicant has not taken opportunity to rectify these prior to submission and this means that a great deal of remedial work will have to be concentrated in the 6-month examination period. This will require considerable resources at a time when	The Applicant respectfully disagrees with the statement that it is not possible to evaluate the impact of the project based on the information provided. Following the submission of the PEIR and the response received, Chapter 13: Transport and Access of the Environmental Statement [APP-045], Appendix 13B (Transport Assessment) of the Environmental Statement [APP-117] and Appendix 13C (Framework Construction Traffic Management Plan and Travel Plan) of the Environmental Statement [APP-118] underwent significant updates with historic traffic flows obtained for inclusion within the Environmental Statement

			SCC is involved in the delivery of a number of NSIPs and the consultations of others.	and with further work carried out at the request of the LHA e.g. various speed surveys, a Stage 1 Road Safety Audit and consultation regarding escorting HGVs through the Newmarket Road/Worlington junction. Presentations were made to the LHAs in March and August 2021, which set out in substantial detail the revised approach to the transport work following the PEIR, with the LHAs being provided the opportunity to make comments at this stage. The transport impact is outlined in Chapter 13: Transport and Access of the Environmental Statement [APP-045] and the Transport Assessment [APP-117] with further information including mitigation outlined in the Framework Construction Traffic Management Plan and Travel Plan [APP-118], the Traffic Regulation Measures Plans - Road Closures [APP-009 – APP-011] and Traffic Regulation Measures Plans - Temporary Measures [APP-012 - APP-013].
SCC-79	Transport and access	Protective provisions	The dDCO does not include sufficient protection for SCC as the Local Highways Authority either through requirements or protective provisions. The dDCO is not acceptable in its submitted form and falls considerably short in terms of quality and content compared to similar orders recently presented for examination.	The Applicant respectfully disagrees and the Council is adequately protected in the draft DCO [APP-019] with provisions that reflect those contained in other approved DCOs. Article 9 sets out the proposed power to make alterations to streets. It contains specific powers in paragraph (1) in relation to the permanent alterations to streets contained in Part 1 of Schedule 5 and the temporary alterations in Part 2 of that Schedule. It also contains a general power that is exercisable only with the consent of the street authority, which, in the case of any street maintained by SCC will be SCC. In terms of the specific power in article 9, SCC should note that article 10 (construction and maintenance of altered streets) addresses this. In relation to the permanent alterations of streets contained in Part 1 of Schedule 5, paragraph (1) of article 10 makes it clear that these “must be completed to the reasonable satisfaction of the highway

				authority”, providing a clear incentive for the undertaker to seek SCC’s agreement to the designs to be employed. In relation to the temporary alterations contained in Part 2 of Schedule 5, again, paragraph (2) ensures that these must be completed to the reasonable satisfaction of the street authority (being SCC in the case of its road) and are to be maintained by the undertaker for the duration of the temporary alterations and for 12 months after their restoration (see para (3)).
SCC-80	Transport and access	DCO conditions	The schedules such as those for road closures and speed restrictions have yet to be assessed in detail. Experience has shown that significant resources are required to check these to ensure they are accurate and therefore enforceable.	The Temporary Traffic Management and Traffic Regulation Measures Plans – Road Closures [APP-009 to APP-011] are integral to the mitigation proposed. These plans should be read alongside the DCO Schedules, both of which have been prepared carefully following the results of the design process and assessment process. Any specific comments on these Plans and Schedules would be welcomed.
SCC-81	Transport and access	DCO conditions	There is no requirement within the dDCO requiring approval of highway works by SCC and therefore no control on the detailed design of the accesses.	See Response to SCC-79.
SCC-82	Transport and access	Access	Further discussion is required regarding the proposed inclusion of authorisation of use of motor vehicles along and across Public Rights of Way.	The Applicant would welcome further discussions with SCC on this topic.
SCC-83	Construction	Access	SCC is continuing to review the Works Plans [APP-007], Access and Rights of Way Plans [APP-008] and will provide detailed comments in the LIR.	This comment is noted.
SCC-84	Transport and access	Safety	At A14/A142 junction 37 heavy vehicles have to ‘boomerang’ due to the movement constraints at the A11/A14 junction 38 (as there is no connection between A14 westbound and A11 northbound or A11 southbound and A14 eastbound). This junction has a poor safety record with a number of crashes recorded at the	Further consultation regarding the A14/A142 J37 is currently being undertaken with discussions regarding appropriate action to be taken. The Applicant has agreed to review information signposted by the LHA in this regard.

			junction of the slip roads and the A142 and reported congestion.	
SCC-85	Transport and access	Safety	The restricted movements at the A11/A14 junction will also result in light vehicles travelling cross country between the A11 and A14 through Red Lodge, Kennet or Tuddenham as reflected in the Applicants forecast (Transport Assessment Annex F). The layout of this junction has a significant impact on traffic movements associated with this development which is not reflected in the TA (3.4.3).	The Applicant respectfully disagrees with the statement that this is not reflected in the Transport Assessment [APP-117] . The restricted movements at the A11/A14 have been considered within the assignment of the construction staff vehicles as set out in the Transport Assessment. As commented in the LHA response, the Transport Assessment identifies vehicle travelling through Red Lodge as reflected in the Transport Assessment Annex F [APP-117] .
SCC-86	Transport and access	Safety	The suitability of narrow rural lanes for construction traffic is a concern. An unusual feature (for Suffolk) is that many of the minor roads are relatively straight and hence can give the impression they can be driven at speed. However, sharp bends and vegetation make high speeds hazardous (see Framework Construction Transport Management Plan and Travel Plan [APP-118] Table 6-1).	In order to provide safe entry and egress to the site accesses, a strategy for access was developed, following the assessment work set out in the Framework CTMP & TP [APP-118] which included temporary speed limit reductions, temporary traffic signals, provision of appropriate signage warning users of the upcoming construction site access. As an example, the Golf Links Road site access was relocated as a result of the consultation, speed surveys were undertaken at the request of the LHA and a Stage 1 Road Safety Audit was undertaken at the request of the LHA.
SCC-87	Transport and access	Safety	There is a lack of concern for vulnerable road users within the submission documents, for example by assuming their absence in the Transport and Access Environmental Statement chapter [APP-045] . Although the data has limitations in providing a robust quantum, SCC has access to data that shows there is some use of the local highway network by cyclists and pedestrians including between the hours of 0600 to 0700 and 1900-2000.	The Applicant respectfully disagrees that there is a lack of concern for vulnerable road users. Section 13.8 of Chapter 13: Transport and Access of the Environmental Statement [APP-045] assesses the impact on Vulnerable Road Users (in the form of Non-Motorised Users) in a number of respects. In line with the IEMA guidance, link sensitivity for Non-Motorised Users (NMUs) is assessed, and the magnitude of increases in traffic flows and HGVs is identified in order to assess the impact of the increased traffic flows and HGVs. The impact on PRowS is also included within Section 13.8 of Chapter 13: Transport and Access of the Environmental Statement [APP-045], with eight temporary closures required during the construction period. The closures of

				PRoWs are expected to be for a maximum of three weeks which is forecast to be the worst-case scenario. Further discussion with SCC has identified that the data referred to is Strava usage data, which they are not able to share, and that they recognise the limitations as a data source. The Environmental Statement does not state that there is no use of the local highway by pedestrians and cyclists at these times, but that the usage is assumed to be low. It is not in dispute that the relevant PRoWs are used, but there is no evidence to suggest that their level of usage would be sufficiently high as to justify any changes to sensitivity category away from that set out in the ES. As such, it remains that a high degree of confidence can be held in the conclusions on the effects to NMUs.
SCC-88	Land use	Public rights of way	Permissive Access proposed is limited and not all opportunities explored within the landscape buffers. Given the time-limited nature of the proposals there is concern that these would not be permanent improvements to the Public Rights of Way network, lasting beyond decommissioning. Details of users of proposed access also not stated. Consideration needs to be beyond pedestrian use and to include access for non-motorised users.	The Permissive Paths are to be provided by the Applicant for the duration of the Scheme, in accordance with the provisions of requirement 21 of the draft DCO [APP-109]. The Permissive Paths are not intended to be a public highway. Requirement 21 of the draft DCO [APP-019] requires the approval by the relevant planning of the details of the permissive paths, including their specification and maintenance regime, prior to their construction and requires the permissive paths to be made available for public use before the final commissioning of the phase of the development to which they relate.
SCC-89	Land use	Public rights of way	It is noted that routes are incorrectly referenced within the document as Footpaths and do not show their correct higher legal status, Bridleway, Restricted Byway. This (Table 10-7: Visual Receptor Sensitivity) provides a false impression of status and users of specific Public Rights of Way.	The Applicant notes that the type of public right of way is generalised in table 10-7 of Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] and in Figure 10-4 [APP-194]. An updated figure (refer to Figure 1 in Appendix B of this Relevant Representations response document) will be submitted to the Examination to provide this information at Deadline 1. This does not alter the definition of associated visual receptors or their sensitivity, which is based on the methodology set out in Appendix 10C of the Environmental Statement APP-102].

SCC-90	Human health	Battery fire safety	The Applicant has produced an Outline Battery Fire Safety Management Plan [APP267] which appears to meet the requirements SCC outlined during the consultation process. Therefore, subject to the relevant control documents being secured by the draft DCO, it is unlikely that SCC will object to this aspect of the development on fire safety grounds. This will be explored in more detail in the LIR, as it should be noted that SCC does not have sufficient in-house expertise to be able to evaluate the submitted appendix on Unplanned Atmospheric Emissions from Battery Energy Storage Systems [APP-124].	The draft Development Consent Order [APP-019] includes requirement 7 in Schedule 2 which secures the Battery Fire Safety Management Plan ("BFSMP"). The BFSMP is to be approved by the relevant planning authorities, in consultation with the fire and rescue services. The BFSMP must be in accordance with the Outline BFSMP which accompanies the application [APP-267] . If SCC accepts that the Outline BFSMP then the Applicant will seek to agree this in a Statement of Common Ground. The Applicant notes the comments concerning the appendix on Unplanned Atmospheric Emissions from Battery Energy Storage Systems [APP-124] . An initial conservative air quality risk assessment has been undertaken. However, a traditional consequence modelling exercise will be undertaken once the detailed design is known and before operation begins. Consequence modelling requires detailed input data regarding the emissions etc., which is why it has not been undertaken at this stage.
SCC-91	Transport and access	Assessment	SCC has, contrary to comments made by the Applicant, not agreed to the methodology used for the transport and access assessment, and on review, the assessment is not considered acceptable.	Pre-PEIR consultation was undertaken with both LHAs for the PEIR (July 2019). Post-PEIR and pre-Environmental Statement, two meetings were held with the LHAs (March & August 2021) and an additional meeting held with National Highways (May 2021) which identified the approach for the Environmental Statement. Further consultation was undertaken via email correspondence with SCC regarding specific topics such as the use of the Newmarket Road/Worlington Road Junction (October 2021). In addition, the site access on Golf Links Road has been relocated based on consultation feedback. Notwithstanding this, the Applicant seeks to agree an acceptable methodology and conclusions and therefore continue to work towards addressing the specific points raised by SCC within this document through the SoCG and the Examination process.
SCC-92	Transport and access	Assessment	Table 13-3 (page 13-24) of the ES sets out the main issues raised during consultation, with regards to link sensitivity the Applicant has set	Table 13-3 of Chapter 13: Transport and Access of the Environmental Statement [APP-045] summarises the responses from various consultees and was abbreviated for

			out that SCC made the following comment: "Categorisation does not appear to be unreasonable and should be agreed with the relevant highway authority". However, the statement provided in SCC's consultation response was actually: "Although the method of categorisation does not appear to be unreasonable, <u>given the relatively small number of links being assessed, and that an absence of facilities does not necessarily mean an absence of users</u>; the categorisation of each link should be agreed with the relevant highway authority." SCC is concerned about how this is misrepresented. The Applicant's categorisations may useful as a starting point, but as the Applicant has not sought to discuss and agree the sensitivity of the links with SCC as expected, nor investigate their use by Non-Motorised Users (NMUs), the classification of the sensitivity of the links is not considered to be acceptable, and represents a significant risk to the conclusions of the assessment. It is also believed that the additional classification based on 'highway sensitivity' has been added since consultation.	succinctness. It is not the intention of the Applicant to misrepresent, however, the omitted section of text does not change the meaning of the sentence as it just provides the rationale for SCC's position, which remains true. The link sensitivities are included within the Section 13.6 and Table 13-16 of Chapter 13: Transport and Access of the Environmental Statement [APP-045], including rationale, and await specific comment on which are not considered acceptable based on the information provided. If required, the Applicant has agreed to a meeting explaining this. However, the conclusion is expected to remain that it is a construction period which is short-term and temporary in nature which therefore is unlikely to change the conclusions of Chapter 13: Transport and Access of the Environmental Statement [APP-045].
SCC-93	Transport and access	Assessment	There is an inappropriate assessment of sensitivity: placing the majority of local highways in the 'very low' category and hence whatever the magnitude of additional traffic the severity of the impact will be calculated as minimal.	The justification of the link sensitivity is clearly identified in Section 13.6 and table 13-16 of Chapter 13: Transport and Access of the Environmental Statement [APP-045] and is considered reasonable and appropriate. As inferred in SCC's comment, there is differentiation between links, with some not being classified as very low. Based on the location, it is to be expected that the majority of links would be classified as "very low" in terms of the IEMA guidance. It is a function of the well-established IEMA guidance as to how the severity of impact is calculated. It is also worth noting, that the Environmental Statement sets out the

				absolute and percentage increases in traffic flows, and comparison with peak hours, and is transparent in the conclusions drawn. As stated in SCC-92, the Applicant has agreed to a meeting on link sensitivity if required and await specific comment on which links SCC considers to have been incorrectly classified based on the information provided in the Environmental Statement.
SCC-94	Transport and access	Assessment	A generic approach has been taken in the assessment ignoring local characteristics. This is particularly marked when considering pedestrians, cyclist and horse riders who are grouped as NMUs and dismissed as being too few to be of importance.	The Applicant respectfully disagrees with the statement that Non Motorised Users (NMUs) have been “<i>dismissed as being too few to be of importance.</i>” NMUs have been considered within Chapter 13: Transport and Access of the Environmental Statement [APP-045] in terms of the impact of the increase in vehicles as well as in the Temporary Road Closure Plans which identify the eight PRoWs that are required to be closed temporarily and the Traffic Regulation Measures Plans – Road Closures [APP-009 to APP-011] which identify where speed reductions and temporary traffic signals are proposed. These mitigation measures will benefit NMUs. The Scheme has been designed to minimise the closure of the PRoWs as far as is practicable with the maximum expected length of PRoWs expected to be three weeks. While the Applicant maintains that its assessment of the effects to NMUs is robust it has carried out additional usage surveys and will share the results with the local highway authorities once they are available. Table 13-16 of Chapter 13: Transport and Access of the Environmental Statement [APP-045] identifies the link sensitivity in terms of NMUs for each of the links where traffic data was available with the methodology identified in paragraph 13.6.64.
SCC-95	Transport and access	Assessment	Professional judgement or consideration has frequently been used without evidence	Where professional judgement or reference to ‘not considered/ not considered likely’ is referenced in Chapter 13: Transport and Access of the Environmental Statement [APP-045], justification and clarification has been provided.

			or substantiation. The assessment includes comments such as 'not considered /not considered likely' (12 times) or impacts are dismissed using 'professional opinion' (20 times) without reference to evidence.	This includes in relation to gaps in the baseline traffic data, driver delay link sensitivity in the absence of junction capacity modelling; Saturday traffic data; splitting HGVs over a 10-hour delivery window; an additional 22 vehicles at the Freckenham junctions in relation to the magnitude of change; and the operation of the Red Lodge dumbbell roundabouts and the Dane Hill roundabout in relation to the significance of effects when considering the forecast operation of the roundabouts in 2031 as identified in the Forest Health Local Plan. The topics identified above are considered appropriate to reference and apply professional judgement based on the experience outlined in the Environmental Statement. This judgment is applied based on extensive EIA experience by competent experts and is also a common feature of EIA methodologies.
SCC-96	Transport and access	Assessment	SCC disagrees with the identification of trunk road slip roads as being 'very low' sensitivity, and cannot understand the rationale for this. As slip roads provide the direct connection onto the trunk roads they are clearly of strategic importance.	The Applicant respectfully disagrees and the justification and rationale is clearly set out in the section 13.6 and table 13-16 in Chapter 13: Transport and Access of the Environmental Statement [APP-045] . The Applicant agrees that the connection to the trunk road are important, but the on-slips onto the A11 and A14 are free flowing and not into a junction, and therefore the classification is reasonable.
SCC-97	Transport and access	Assessment	The Applicant has used an average car occupancy factor which was agreed by SCC for Sizewell C, but Sizewell C is a different project with off-site park and rides, a local bus service, site campus and a different workforce profile. It is therefore inappropriate to use the same figure without reflection on the relevant differences between the two contexts.	The average vehicle occupancy was identified from the Hinkley Point C monitoring reports. The average vehicle occupancy represents a car driver mode share of 67% with the remaining 33% to be made up of car passengers, sustainable transport modes and the mini-bus service. The average vehicle occupancy is used to identify the forecast number of construction car vehicles on the highway network. The car driver mode share of 67% is considered appropriate for the assessment of the Scheme. The remaining mode share is to be made up of sustainable modes. The car driver mode share is not reliant on achieving a mode share for walking, cycling, public transport (bus & rail) or the mini-bus service. The mode share applied is considered appropriate for the assessment of the Scheme. The CTMP and Travel Plan to be submitted

				for approval under requirement 16 of the draft DCO [APP-019] will further identify measures to reduce the number of construction staff vehicles such as encouraging car sharing and providing a mini-bus service to pick-up/drop-off local construction staff. The average car occupancy factor has been discussed with the LHAs (26 April 2022), and the Applicant has agreed to share further evidence of the validity of the assumption and is discussing carrying out a sensitivity test into the effect of varying the factor on traffic impact.
SCC-98	Transport and access	Assessment	The assessment should be aware that the AIL route used between the Port of Ipswich and Burwell diverts onto local roads to avoid weak structures on the SRN.	This comment is noted.
SCC-99	Construction	Assessment	Paragraph 13.3.4 of the ES notes that the construction programme has been assessed as the shortest realistic programme. It sets out that a phased construction would be the same or lesser in terms of effects, as previously noted for the assessment of combined effects clarification is sought on the potential for the individual peaks to occur as an 'in-combination peak' (West month 12 + East month 8 = 1,521) rather than the current assessment which is based on the busiest month of the 24 month programme (month 9 = 1,393 staff), as, if this could potentially occur, then this would represent the true worst case impact. If it cannot reasonably occur, then controls should be put on the peak number of staff movements to ensure that this is the case.	The information provided by the Applicant demonstrates that Sunnica East Site A & B and Sunnica West Site A & B are not to be built-out at the same rate and the two peak months do not occur at the same time. Section 13.8 of Chapter 13: Transport and Access of the Environmental Statement [APP-045] considers the Sunnica West Site A & B peaks individually as well as the combined peaks. The combined Scheme peak occurs in a different month to the two individual site peaks and this represents a reasonable worst-case scenario in terms of the Scheme. To assess a situation where both the site peaks occur at the same time, whilst it would be an absolute worst case, is not realistic and is therefore not a reasonable scenario for assessment. Subject to the Scheme receiving development consent, the Applicant will set out its detailed construction programme within the Construction Environmental Management Plan that will be subject to sign off by the local authorities. This programme will be prepared to ensure that the development peak on each site does not occur at the same time.
SCC-100	Transport and access	Assessment	Paragraph 13.4.10 of the ES sets out the Applicant's assessment of car share, which is	Please see SCC-97.

			based on the assessment methodology used for Sizewell C, which was in turn based on evidence collected from Hinkley Point C. SCC does not agree with this application for the following reasons: • Sizewell C and Hinkley Point are much larger development with a larger workforce potentially making car sharing more likely. • The transitory nature of the workforce i.e. staying in shared accommodation whilst working on the Sizewell C project may make them more likely to car share. • REP2-046 of the Sizewell C Transport Assessment (EN010012-004849-D2 - Sizewell C Project - Other-Consolidated Transport Assessment Appendices Part 1 of 6.pdf (planninginspectorate.gov.uk)) sets out the methodology used and Table 4 of Appendix 7B provides the surveyed car share figures from Hinkley Point, importantly the car share factors being experienced at that time were approximately 1.3 workers per car. The use of 1.54 workers per car was for non-home based workers only, with home based workers remaining at 1.1 workers per car. Therefore, a generic application of 1.5 is not representative of the data. Further information is needed on the workforce to determine which of the figures above would	

			be most appropriate for the development's workforce	
SCC-101	Transport and access	Policy	SCC does not consider the Applicant has fully applied the appropriate national guidance in preparation of the Transport Assessment, specifically in terms of traffic modelling.	Transport submissions need to provide an appropriate level of assessment of their travel impacts, the scale and form of which will vary significantly by context. It is unclear which national guidance has not been fully applied as requirements for traffic modelling are not specified in national guidance. The Transport Assessment [APP-117] and Chapter 13: Transport and Access of the Environmental Statement [APP-045] provide and justify the methodology for assessment of the impact on driver delay through the absolute and percentage change in traffic flows, as well as comparison with peak period data to provide useful context and a reference point to with regards the capacity performance of the network. This is entirely appropriate and standard practice for an Environmental Statement, particularly considering the changes in traffic flows occur for a short-term, temporary time period during construction, outside of traffic network peaks. Further explanation on this approach has been provided to the LHAs (26 April 2022).
SCC-102	Transport and access	Policy	Paragraph 5.13.1 of the NPS EN-1 and quoted by the Applicant states that if the project is likely to have significant implications a transport assessment should be undertaken using WebTAG methodology. The Applicant refers to their ref 4 stating they have used Ministry of Housing, Communities and Local Government (March 2014) Travel Plans, Transport Assessments and Statements, ID 42. The MCHCLG document explains why transport assessments and travel plans are required and at a high level what they should contain. The document does not reference the methodology to be used nor provide detailed comments on assessment methods. The submitted TA does not in SCC's opinion contain all that is required	The Applicant respectfully disagrees with the statement that the assessment does not provide a <i>'thorough assessment of the transport implications of development'</i>. The transport documents include Chapter 13: Transport and Access of the Environmental Statement [APP-045], the Transport Assessment [APP-117], the Framework Construction Traffic Management Plan and Travel Plan [APP-118], the Traffic Regulation Measures Plans – Road Closures [APP-009 to APP-011] and the Temporary Traffic Management Plans – Temporary Measures [APP-012-013] which is considered to provide a thorough and appropriate assessment of the Scheme. The Applicant respectfully disagrees with the statement <i>'the application fails to encourage sustainable travel, lessen its traffic generation and as such its detrimental impacts nor</i>

			for a 'thorough assessment of the transport implications of development' as required by the guidance. The application fails to encourage sustainable travel, lessen its traffic generation and as such its detrimental impacts nor improve road safety as would be expected from a Transport Assessment. The assessment does not undertake a full assessment of road network capacity, as would be expected, but rather relies on work undertaken as part of the Forest Heath Local Plan process, which although relevant does not negate the need for specific junction modelling. The guidance indicates that the timeframes that the transport assessment covers should be agreed with the local planning authority in consultation with the relevant transport network operators and service provided.	<i>improve road safety</i>'. The Transport Assessment [APP-117] and the Framework Construction Traffic Management Plan and Travel Plan [APP-118] identify measures to encourage sustainable travel such as increasing car passenger mode share and through the provision of a mini-bus(s) service to pick-up/drop-off construction staff. It is identified in Transport Assessment [APP-117] that the bus and rail timetables do not match the arrival and departure times of the construction staff, which provides justification to encouraging car sharing and the provision of the mini-bus(s) service. Commitment is made in the Framework Construction Traffic Management Plan and Travel Plan [APP-118] to further develop the sustainable travel measures in the Travel Plan as the Scheme progresses and more is known about the future workforce. In addition, the proposed mitigation is shown on the Traffic Regulation Measures Plans – Road Closures [APP-009 to APP-011] and Traffic Regulation Measures Plans - Temporary Measures [APP-012 - APP-013] that proposes to include temporary speed limit reductions and temporary traffic signals to provide safe entry and egress in/out of the site accesses. SCC-101 above refers to the suitability of the assessment of impact on driver delay. As outlined in the Environmental Statement it is not considered necessary to undertake junction capacity modelling as the Forest Heath Local Plan identifies the Red Lodge Dumbbell roundabout and Dane Hill roundabout to operate between 0.46 and 0.50 RFC in 2031 with similar traffic flows as identified in the peak construction month of the Scheme, thus enabling clear conclusions to be drawn. The timeframe included within the Transport Assessment [APP-117] represents the peak construction months for Sunnica East Site A & B, Sunnica West Site A & B and the Scheme overall. It is agreed that an assessment of the

				operational phase is not required, and the construction phase is time limited. The Applicant therefore considered it reasonable to undertake an assessment of the timeframe of the construction phase taking into account that operational effects were scoped out of the assessment, in accordance with the Scoping Opinion [APP-052] .
SCC-103	Transport and access	Policy	SCC disputes that the transport assessment has been submitted with acceptable levels of consultation with the local highway authority notably that comments made during consultation have not been reflected in the application. The Applicant has not demonstrated whether or how it has considered local policy and guidance such as: • Local Transport Plan: • SCC travel plan guidance: • Green Access Plan Green Access Strategy (Rights Of Way Improvement Plan) • Highways Operational Plan • Highways Asset Management Plan • Speed Guidance • National Bus Strategy in Suffolk	References to the level of consultation are discussed in SCC-76 and SCC-78. Annex A of Chapter 13: Transport and Access of the Environmental Statement [APP-045] contains a policy review. A combined Framework CTMP and TP document [APP-118] has been submitted outlining the measures proposed to mitigate the transport impacts. A requirement of the DCO will ensure that these measures will be developed in detail and complied with. When the final Travel Plan is produced it will be in line with the most up to date version of the Suffolk Travel Plan Guidance, noting that the current version is dated December 2021, after the DCO application was submitted. The consideration of PRoWs is included within Chapter 13: Transport and Access of the Environmental Statement [APP-045] which outlines the PRoWs which are expected to be temporarily closed for no longer than three weeks. Also, as part of the scheme a number of new Permissive Routes are identified to be present during the operational phase of the Scheme. Due to the highly limited and temporary nature of scheme impact on PRoW, and mitigation not being required to the PRoW network, it is not considered necessary to include a review of the Green Access Plan Green Access Strategy (Rights of Way Improvement Plan). The Highways Infrastructure Asset Management Plan and Highways Operational Management Plan relate primarily to maintenance of highways assets. The Framework CTMP [APP-118] includes commitment to before, during and after condition surveys to ensure that the development identifies

				and addresses potential deterioration of the highways as a result of construction activities. Proposals for works to the public highway, for which such documents may hold relevance, are at preliminary stage, and therefore these documents can be considered at later, appropriate, stages of design With regards to the Speed Guidance, it is assumed that this refers to Suffolk CC's Speed Limit Policy (2014). The scheme proposals include introducing temporary speed limits at access points in rural locations. This situation is not included within the Policy. The Policy established that existing speeds should be a factor in setting of speed limits. Traffic speed surveys have been undertaken to evidence the appropriateness of the temporary speed limits proposed within the Traffic Regulation Measures Plans - Temporary Measures [APP-012 to APP-013]. It is not considered relevant to outline the National Bus Strategy in Suffolk given the arrival and departure of the construction staff and the services available at those times. Furthermore, whilst the Local Transport Plan is an important document, Chapter 13: Transport and Access of the Environmental Statement [APP-045] demonstrates that the construction phase of the development will be acceptable without reliance on strategic transport improvements. As a temporary scheme, with limited effects on the highways network, the development will also not preclude the delivery of schemes within the Local Transport Plan.
SCC-104	Operations	Maintenance	Scoping out of the Operational Phase would be acceptable provided that it can be confirmed by the Applicant that there is no likelihood of significant maintenance, such as wholesale replacement of solar panels or batteries, during this phase. SCC notes the definition of 'maintain' in Article 2(1) of the draft DCO [APP-019] allows for partial replacement and the	Section 3.7 of Chapter 3, Scheme Description of the Environmental Statement [APP-035] sets out the assumptions that have been made as to the extent of operational and maintenance activity, which is reflected in the DCO definition. This includes the inspection, removal, reconstruction, refurbishment or replacement of faulty or broken equipment

			limitation in Article 5(3) on maintenance works which have new or different environmental effects to those assessed, and will be seeking clarification and confirmation as to what is intended, given that baseline conditions for the receiving environment (especially as regards traffic) can be expected to be very different in 20 or 30 years' time.	to ensure the continued effective operation of the Scheme and improve its efficiency. This would include panels or batteries where necessary. However, it is not expected that there will be significant maintenance required, and the DCO does not allow wholesale replacement of the authorised development that would give rise to new or materially different environmental effects than those that have been assessed in maintenance in the Environmental Statement. Environmental management during the operational phase would be covered by the Operational Environmental Management Plan approved under Requirement 15 of the Draft Development Consent Order [APP-019]. Article 5(3) refers to such works not leading to any materially new or materially different effects that have not been assessed in the environmental statement. That is therefore the baseline position against which the maintenance activities would be carried out.
SCC-105	Operations	Working hours	The Applicant relies on strict shift patterns to avoid impact on the highway network in peak hours. SCC requires further evidence that this can indeed be delivered and that acceptable controls are in place to ensure that trips do not exceed those assumed and greater impacts occur on the highway network than assessed.	These controls will be brought forward and evidenced as part of bringing forward the CTMP for SCC's approval pursuant to requirement 16 of the DCO.
SCC-106	Operations	Parking	Further details are required to show that the parking permit scheme will be effective, for example there are no controls on workers parking in nearby communities and being picked up by colleagues for the last mile, resulting in potential fly parking. Details such as how traffic will be managed when entering the car parks is lacking.	For construction staff workers who are local residents to the Scheme, a mini-bus service will be investigated to pick-up/drop off construction staff workers to reduce the number of staff vehicles. Details of this can only be confirmed once the construction staff home locations are known and would be for the contractor to manage and implement, if/when this service is required. This is identified in paragraph 7.2.30 in the Framework Construction Traffic Management Plan and Travel Plan [APP-118].

				The two car park locations have been chosen close to the Strategic Road Network (A11) to encourage staff to use the A11 and A14 for as much of their journey to/from the site as possible to avoid passing through local residential areas: • Sunnica West Site A – to be accessed off La Hogue Road which links to the A11 approximately 400m / 0.25 miles to the south of the site access; and • Sunnica East Site B – to be accessed off Elms Road, which is located circa 1km / 0.6 miles to the A11 northbound off-slip/Elms Road T-Junction and is also located in close proximity 1.6km / 1 mile to the Red Lodge Dumbbell Roundabout The size of the two construction staff car parks has been identified to accommodate the peak number of construction vehicles forecast. As the construction of the Scheme progresses the two car parks will be required to be reduced in size. It is not considered that staff will need to 'fly-park' if the car parks are large enough to accommodate the required vehicles. The usage of car parks will be monitored through the construction phase. A Stakeholder Community Liaison Officer will be in post through the construction phase, with part of the role being to listen to concerns from local communities. If "fly parking" does occur, they would work with the LHA to identify whether it is creating a safety or amenity issue in a local community, and if so, to request staff not to do so, and work through the Travel Plan process to enact ways to reduce the occurrence.
SCC-107	Transport and access	HGV movements	SCC is not satisfied with assumptions made such as a constant profile of movement throughout the day. This is contrary to information provided for other projects.	The Applicant respectfully disagrees. It is robustly assumed there will be a 10-hour construction delivery window based on the 12-hour construction worker shift as this excludes the two network peak hours. Movements are split equally across the 10-hours, which is a greater level of trips per hour than a constant profile, given the 12-hour working

				time. Furthermore, the calculated hourly level of HGVs is based on the peak of the construction period. This is a reasonable and robust approach based on the assessor's experience producing EIA applications and reviewing them in a development management function on behalf of LHAs.
SCC-108	Transport and access	HGV movements	The data used to calculate the number of HGVs for construction is being reviewed, but initial concerns are that key issues such as the movements to supply and remove aggregate for haul roads and peaks associated with concrete pours have been considered.	An experienced contractor provided information on the HGV forecasts, and this included the concrete deliveries required for the haul roads and concrete as part of the civil works required.
SCC-109	Transport and access	Assessment	There are limitations to the traffic data provided. SCC appreciates that current circumstances make collecting additional data difficult and that historic traffic patterns may alter as a result of the pandemic. On this basis SCC has attempted to review and respond pragmatically; however, there remain locations where data is not provided, and this is particularly important when considering the absence of data on NMUs, and the assessment of impacts on this basis.	This is noted and has been discussed with the LHAs post application. Our position remains that the conclusions drawn on the data available are sufficiently robust to be valid. However, to provide further confidence, additional traffic and NMu surveys have been undertaken and will be reported on when the data is available. This approach has been agreed with the LHAs, and opportunity to comment on the scope of surveys was provided.
SCC-110	Transport and access	Safety	SCC has not fully reviewed the crash data presented but remains concerned regarding the frequency of crashes at A14/A142 Junction and the impact of the construction on the safety of minor roads adjacent to Sunnica East particularly vulnerable groups.	Discussions are on-going with the LHA regarding the A14/A142 junction and potential measures to improve safety at the junction during the construction period. The Temporary Regulation Measures Plans – Road Closures [APP-009 to APP-011] and Temporary Regulation Measures Plans – Temporary Measures [APP-012 to APP-013] set out the proposed temporary speed limit reductions and traffic signals at the construction site accesses. These measures will benefit NMUs along the highway.
SCC-111	Land use	Public rights of way	Requirement 21 of the dDCO (APP-019) ensures that the permissive paths must be retained until decommissioning. However, this	SCC is correct in its understanding that the permissive paths would not constitute highways and would not be permanent. The weight to be afforded the permissive paths

			will not form a permanent right of way given to the benefit to rights of way users, nor will the permissive paths have the same amenity value as existing rights of Way. Thus, SCC considers limited weight should be given to these proposals by the inspector. No 'permitted path details' are provided so it is unclear who will be responsible for their maintenance.	is a matter for the decision maker, but the Applicant considers that the provision of such paths for the duration of the Scheme will constitute a benefit for those users. Requirement 21(1)(c) of the draft DCO [APP-019] provides that the details of the permissive paths would need to include the maintenance regime for each path, which, by definition, would include clarity on who would undertake such maintenance.
SCC-112	Land use	Public rights of way	No evidence has been provided to substantiate the claim (6.15) that the PRow are recreational routes nor surveys undertaken to show that the 'expectation' that pedestrian flows are low is correct.	It is not considered appropriate to undertake surveys of PRow given the length of time the PRow are forecast to be closed which is expected to be a maximum of three weeks which is considered to be a worst-case scenario. It is the Applicant's view given the characteristics of the PRow in relation to location, lack of desire lines for commuting, distances between significant origin and destinations, lack of paving and lighting etc, that it is reasonable to conclude that the PRow are predominantly recreational routes.
SCC-113	Transport and access	Assessment	SCC considers that there are shortfalls in the Transport Assessment such as: - Fundamental issues around the assessment of the development's impact based on 12-hour day shift patterns - The assessment of driver delay does not quantify impacts in terms of delay (e.g. increasing in journey time). The impacts are entirely based on changes in traffic flow, and whilst this may provide some indication about the potential change in delay it does not define the changes in delay meaningfully.	The construction working hours will be secured pursuant to approval of the CEMP, therefore the assessment is considered reasonable to base the arrival hour of staff between 0600-0700 and departure hour of staff between 1900-2000. The assessment of driver delay is considered appropriate and reasonable as discussed in SCC-101 and SCC-102. Phrases such as "it is expected" or "it is considered that" are used to draw conclusions based on the evidence presented, which is justified in Chapter 13: Transport and Access of the Environmental Statement [APP-045] and the Transport Assessment [APP-117]. The spreadsheet used to calculate the ratio to determine the development peak hour traffic flow from the available traffic data can be provided to the LHA for review.

			• The use of phrases such as 'it is expected' or 'it is considered that' should not been accepted as evidence. • Concerns remain regarding the accuracy of the ratio used to determine baseline flows in the development peak hours. The data used to calculate these reductions should be submitted for review particularly as Table 3-13 indicates a range of differences between these hours particularly for the AM which appears to be between 0.6 and 0.8 rather than the 0.4 which has been used, albeit it is recognised that these figures are for a more strategic part of the network and so may be lower for more rural locations. • Dismissing traffic impact of construction traffic on Saturday is not accepted without evidence. The ending of a shift at 1300 may coincide with the peak on Saturday. • Removing the minibus movements (59 single direction trips i.e. 118 movements) should not be dismissed from the modelling particularly on Elms Road. Impacts are often dismissed based on their comparison to the peak hour (such as paragraph 13.8.227), this is not considered a valid reason for dismissing impacts given the assessment is to test the development's impact, not whether the network operates better during certain other periods.	The level of construction workers and HGVs required on-site during the Saturday working hours are typically significantly lower than those identified for a weekday due to more limited construction activities on these days. The amount is currently not quantified however the Applicant will investigate whether the LHA can be provided with further information in this regard. The mini-bus trips will occur outside of the construction and network peak hours. The mini-bus trips are forecast to occur after the workers have arrived on and before the network peak hour in the AM. In the PM the mini-bus trips are in relation to transporting staff across the site back to the two staff car parks. Therefore, it is not considered necessary to forecast the percentage impact during the hours the mini-bus trips are expected to occur given the low number of trips across the local highway network to a number of different site accesses. The timing of the mini-bus trips has been discussed and outlined in the meeting with the LHA (April 2022). The Applicant respectfully disagrees with the final bullet point regarding the validity of comparison with the peak hour. The reason for the comparison of the development peak hours baseline and development traffic against the highway peak hours is to demonstrate that significant delay or congestion is not forecast as a result of the scheme. It is considered a reasonable approach to demonstrate that the Scheme would not have a significant impact on the highway network if the traffic flows were lower than the peak hours where delay and congestion would be at its greatest.

SCC-114	Transport and access	Mitigation	The mitigation relies on Staff routing (4.5.6), vehicle occupancy, working hours (4.5.7), on site car parking strategy (4.5.8) management of parking access (4.5.9), proposed parking permits (4.5.11) minibuses for internal movements <u>where possible</u> (4.5.12) and <u>investigations</u> into minibuses pick up from local residential areas (4.5.14). Many of these measures are not firm commitments enshrined in the dDCO or supporting documents and can therefore be given little weight as mitigation, for example in 6.3.19.	The Applicant respectfully disagrees, References to passages in the F-CTMP and TP [APP-118] are included in brackets to signpost the reader to the relevant sections, and there are multiple further mitigation measures set out within the F-CTMP and TP [APP-118], with management measures included in Section 7. The car parking strategy (7.2.27 to 7.2.29) has been developed to minimise the number and requirement for construction staff vehicles to travel on local roads with the two car parks located near to the A11. The construction working hours (7.2.26) will be secured pursuant to approval of the CEMP, provided in outline as Appendix 16C of the ES [APP-123]. The car parking strategy (7.2.27), management of parking access (7.2.28), proposed parking permits (7.2.29) and using minibuses for internal movements (7.2.30) are all firm commitments within the Framework Construction Traffic Management Plan and Travel Plan [APP-118]. However, it is agreed at this stage that the exact routing and frequency of the mini-bus(s) to local residential areas (7.2.31) cannot be confirmed as the home locations of the construction staff are unknown and therefore it is not possible to identify the exact routes and frequencies. It is noted that the construction vehicle occupancy parameter has been questioned by the LHAs. In response to this, the Applicant has reviewed the parameters assessed across a wide range of DCO projects, with an additional focus on wind and solar as the closest comparable projects. This review shows that 1.5 is a robust vehicle occupancy parameter. Further to this, the Applicant has undertaken a sensitivity analysis using a parameter of 1.3 vehicle occupants, as the lowest vehicle occupancy in the review was 1.33. If this parameter were to be applied, there would be no new impacts that would be classed as significant in EIA terms. This information has been presented to the LHAs, and is not understood to be in dispute at the time of writing.

				All the proposed mitigation outlined are considered appropriate for the Scheme and the level of commitment is appropriate given the stage of the proposals. Compliance with the measures contained in the F-CTMP and TP [APP-123] are secured through requirement 16 of the draft development consent order, which requires the approval of the relevant county authority of the full Construction Traffic Management Plan before the commencement of the authorised development.
SCC-115	Transport and access	Monitoring, control and enforcement	SCCs consider that they are best placed to be the authorisation body for construction traffic management and travel plans as these relate to public highways under their control and have teams with the relevant technical knowledge.	The valuable contribution that the SCC and other highway authorities can provide in relation to the Construction Traffic Management Plan is recognised in Requirement 16 of the draft DCO [APP-019], which provides for those bodies to determine whether to approve the detailed Construction Traffic Management Plan.
SCC-116	Transport and access	Monitoring, control and enforcement	SCC considers that the monitoring and controls proposed within the Framework Construction Traffic Management Plan are not acceptable in the current form. Specific issues are: • Vagueness of some measures, for example: Measures could include implementing a three-strike system for contractors which could lead to financial penalties (7.2.4) HGV deliveries can be arranged to avoid the need for vehicles to depart the Site within the PM avoid the network peak hour (17:00-18:00) (7.2.6). • The management plan does not include monitoring of car occupancy to ensure that the proposed 1.5 occupancy is achieved. • The Applicant has not explained how compliance with staff arriving before	The Construction Traffic Management Plan and Travel Plan [APP-118] is a Framework which is appropriate for the stage of the proposals and in particular section 7 regarding management. Therefore, the contractor is expected to finalise the measures within the final CTMP document which must be substantially in accordance with the Framework CTMP [APP-118], and which will be submitted for approved by the relevant local highway authorities, pursuant to requirement 16 of the draft DCO [APP-019].

			0700 and leaving after 1900 will be monitored and enforced other than a car parking permit system is proposed to be implemented across the two car parking areas (7.2.29). It is unclear how regular reports will be issued and to whom (7.4.2 and 8.2.2). It is also unclear how issues will be identified and resolved and how this will be communicated to interested parties other than 'monitoring reports will be made available the relevant local planning authorities and relevant highway authorities at their request to ensure compliance and that action is being taken where breaches are occurring' (8.2.5). SCC considers that such information should be regularly reported to local planning and highway authorities and made public. The Applicant does not consider how complaints will be collected, assessed and where necessary action taken to resolve any issues that arise.	
SCC-117	Transport and access	Access	The plans provided to support the access reviews are insufficient to enable a meaning full assessment of their safety and deliverability within the order limits. Specific issues are: - They are based on poor quality plans which do not appear to have been validated by on site surveys. - The plans are not to scale and barely legible. - The highway boundary has not been shown to confirm the works can be	The Temporary Regulation Measures Plans – Temporary Measures [APP-012-013] and the Traffic Regulation Measures Plans – Road Closures [APP-009 to APP-011] identify the proposed temporary speed limit reductions, proposed temporary traffic signals and temporary road closures which all form part of the mitigation to provide safe entry and egress to the construction site accesses. The mitigation proposed has been undertaken on a mixture of available topographical survey mapping and OS mapping. The proposed temporary speed limit reductions and temporary traffic signals are proposed to limit the amount of

			delivered within the order limits / highway boundary including oversailing of land adjacent to the highway by large vehicles. • Visibility splays either side of the accesses are poorly shown, if at all, and impossible to validate. The presence of hedges, trees, ditches and utility apparatus that may affect the design are not shown. See table 13 for B1102 Freckenham Road (south) where it is noted that the visibility splays are 2.4m x 215m and that mature trees and hedgerows are present on either side of the road.	vegetation removal/trimming required to create the site accesses and also to provide safe entry and egress to the construction site accesses without large amounts of vegetation trimming/removal as construction site access are only required for a short period of time. The information provided in the Annex of the Framework Construction Traffic Management Plan and Travel Plan [APP-118] is supplementary information that was used in the initial site access review and outlines the visibility splay requirements based on 60mph (100kph) speed limit and uses Google Earth aerial imagery to provide clarity in rural locations with few discernible landmarks. The intention of the plans is to provide supplementary information to the proposed mitigation. The information provided for the site accesses in the Framework Construction Traffic Management Plan and Travel Plan [APP-118] has been undertaken on a mixture of available topographical survey mapping and OS mapping. Discussions are ongoing with the local highway authorities regarding producing a suite of consolidated plans setting out the presentation of the information for each of the site accesses. This includes addressing the specific points referred to. The level of information provided within the application documents referred to above is suitable for the purpose of demonstrating the feasibility of their proposed use. Subsequent detailed design of the accesses would require the approval of the relevant local planning authority, pursuant to requirement 6 (detailed design) and compliance with the provisions of the draft DCO [APP-019] outlined in response CCC-57.
SCC-118	Transport and access	Access	The quality of the information can be contrasted with the provided for the EA1(N) application in the Outline Access Management Plan for a similar scale of development. SCC would consider the lack of this information so	The application includes a site access review which included identifying the visibility splay requirements based on the speed limit of the highway. The initial review identified a large amount of vegetation to be trimmed/removed, which would have been inappropriate for

			important as to object to granting of an order until such time as sufficient information can be provided to evaluate the proposals.	short-term temporary accesses due to other environmental impacts. As a result, therefore a strategy for access was created which included Temporary Speed Limit Reductions and Temporary Traffic Signals, which has been included in the submitted application. Subsequently, swept path analysis and indicative junction layouts consistent with an approach that seeks to minimise the potential adverse effects of extensive vegetation removal, are also provided in the Framework Construction Traffic Management Plan and Travel Plan [APP-118] . An AIL/Crane route review was also undertaken which identifies where street furniture or signage is required to be temporarily relocated to accommodate the largest crane. Speed surveys were also undertaken at the request of the LHA and included in the Framework Construction Traffic Management Plan and Travel Plan [APP-118] along with the Stage 1 Road Safety Audit which was also requested by the LHA. Information regarding the management of the site accesses and the two staff car parks are also outlined in the Framework Construction Traffic Management Plan and Travel Plan [APP-118] .
SCC-119	Transport and access	Highways works	SCC was not consulted on these plans prior to submission. Neither the proposed widened road width nor detail design, specifically edge restraint for the road construction, have been agreed with SCC. While Manual for Streets (MfS) does indicate a width of 4.8m allows an HGV to pass a car it also indicates 5.5m is necessary for HGVs to pass each other. MfS is primarily guidance for residential low speed streets rather than rural roads. In rural situations SCC would consider use of Design Manual for Roads and Bridges (DMRB) to be a more appropriate starting point for design. Such dimensions do not allow for additional space at bends or junctions nor do these dimensions allow for overhang (e.g. mirrors). A width of 4.8m will result in loading of the carriageway	During a consultation meeting (26 April 2022) with the LHA it was confirmed that the primary concerns were two HGVs meeting each other, and impact on highways condition of use of the edge of the carriageway and verge. The Applicant confirmed that the Framework Construction Traffic Management Plan and Travel Plan [APP-118] includes the provision for before, during and after condition surveys of the highway. It is understood that this addresses the second point. The road widths vary, so there are a number of locations currently where two HGVs can pass, as well as locations where widths need increasing. The safety of passage of two HGVs depends on the width of the road, curvature and forward visibility. As a result of the concern previously raised during consultation a review of Elms Road and La Hogue Road was undertaken to identify where the highway was less than 4.8m wide as this width is identified from Manual for Streets as being able to accommodate an

			edge leading to failure and vehicles are likely to overrun the verge resulting in erosion or rutting of the verge.	HGV passing a car. However, it is accepted that the LHA seeks to ensure an HGV can pass an HGV which is identified in DMRB as requiring a road width of 5.5m, and may need to be wider in some locations depending on swept path analysis of vehicles. The Applicant's position is that a consistent width suitable for two HGVs to pass is not required, and the Applicant does not understand this to be in dispute, but that sufficient locations for passing with good intervisibility will need to be available. Revised plans demonstrating how this can be achieved within the Order limits are being prepared and will be submitted to the LHAs for review and discussion when available.

2.2 RR-1178 Cambridgeshire County Council

Applicant responses to RR-1178

Applicant's Ref.	Theme	Issue	Summary of issue raised	Applicant's response
CCC-1	Other	Quality of information	Cambridgeshire County Council has a number of concerns relating to the quality of the information shared in the Environmental Statement (ES). More evidence is required to allow CCC to fully understand the impacts of the scheme and have a view to whether the mitigation measures proposed are sufficient.	The Applicant respectfully disagrees and is currently undertaking further engagement with CCC in order to direct CCC to the evidence contained within the application and to understand the additional evidence that CCC indicates it requires to fully understand the impacts of the Scheme.
CCC-2	Planning/ other	Assessments	Concerns about the quality of assessments and assumption used regarding scale of the development	Please refer to the Applicant's response to CCC-1 above. As set out in ES Appendix 1C [APP-053] , the ES has been prepared by a highly experienced team of experts.
CCC-3	Other	Deliverability	More detail is needed to assure the county council that aspects of the scheme are deliverable.	This comment is noted, however, the Applicant respectfully disagrees in the strongest possible terms and is extremely confident that the Scheme is fully deliverable. Solar PV is an established and proven technology, with a short construction/installation time compared to other electricity generation technologies. It is also a very cost-effective technology, helping to deliver

				electricity to consumers at low cost. The Applicant has secured a connection to the National Electricity Transmission Network (NETS) from National Grid Electricity Transmission and is at a very advanced stage in negotiations with landowners. A great deal of work has been undertaken by the Applicant in the iterative development of the Scheme with its expert team to ensure that the Scheme's impacts will be acceptable and that it will deliver its objectives.
CCC-4	Transport and Access	Evidence	Lack of supportive evidence re assumptions.	The assumptions and justification are outlined in Chapter 13: Transport and Access of the Environmental Statement [APP-045] and the Transport Assessment [APP-117] . These are considered robust. Specific points made by CCC in the main body of its relevant representation are addressed in this response document.
CCC-5	Transport and Access	Assessments	Impacts which CCC feel are not sufficiently assessed.	The impacts are outlined in Chapter 13: Transport and Access of the Environmental Statement [APP-045] and the Transport Assessment [APP-117] with supportive management and mitigation outlined in the Framework Construction Traffic Management Plan and Travel Plan [APP-118] and the Traffic Regulation Measures Plans – Temporary Road Closures and Traffic Regulation Measures Plans – Temporary Measures plans [APP-012 and APP-013] . Specific points made by CCC in the main body of its relevant representation are addressed in this response document.
CCC-6	Transport and Access	Provisions and engagement	The draft Development Consent Order (DCO) has not got sufficient highway provisions to ensure the local highway authority is adequately engaged.	The Applicant respectfully disagrees, please see the relevant responses below in relation to the provisions of the draft DCO [APP-019] .
CCC-7	Heritage	Mitigation strategy	Cultural Heritage Archaeology – mitigation strategy is vague and requires development	Mitigation is detailed in paragraph 7.6.6 to 7.6.9 and in Section 7.8 of Chapter 7: Cultural Heritage of the Environmental Statement [APP-039] . These set out the framework for how the mitigation strategy would be developed during the project development process. However, as noted in paragraph 7.8.4 of that chapter,

				"Outstanding results, from evaluation trenching that was delayed due to land access and cropping schedule constraints, will be submitted prior to the examination stage of this application." This information was required before a more specific mitigation strategy could be completed. The outstanding results of the evaluation have been submitted to the ExA at Procedural Deadline A on the 13th July 2022 [PDA-002]. A Detailed Archaeological Mitigation Strategy will be prepared for discussion with the County Councils and finalised in accordance with a joint County Council Brief currently in preparation and once agreed will be submitted to the Examination.
CCC-8	EIA process	Evidence – detail	Ecology and Nature Conservation - Environmental Statement provides inadequate detail in terms of evidence	The Applicant respectfully disagrees and is currently undertaking further engagement with CCC in order to direct CCC to the evidence contained within the application and to understand the additional evidence that CCC indicates it requires to fully understand the impacts of the Scheme.
CCC-9	EIA process	Evidence – data	Flood Risk, Drainage and Water Resources - Lack of data to evidence the adopted approach and proposed measures	The Applicant respectfully disagrees and is currently undertaking further engagement with CCC in order to direct CCC to the evidence contained within the Application and to understand the additional evidence that CCC indicates it requires to fully understand the impacts of the Scheme.
CCC-10	Location/ water resources	Compensation	No flood zone compensation proposed	The Flood Risk Assessment (FRA) Rev 1 [AS-007 to AS-010] has assessed the potential for the Scheme to impact flood risk on or off the site. Paragraph 4.3.8 of the FRA concludes that the legs that support the solar panels are <100mm in diameter and pose no increased risk to flood risk and therefore do not require compensation (in respect to the floodplain around the River Lark). Solar inverter stations occupy approx. 4m³ per station and thus have a negligible impact on floodplain volume within the rural catchment. Development within the Order limits will not increase the

				existing flood risk on or off site as a result of the development proposals. However, during a meeting with the Environment Agency on 7th March 2022, the need for more discussion over the potential for the need for floodplain compensation and corresponding hydraulic modelling was highlighted. The Applicant is currently undertaking further modelling, the technical scope of which has been agreed with the Environment Agency, and consultation with them is continuing. The results of the modelling will be shared with the Environment Agency and the drainage bodies, when available.
CCC-11	Land use	Growth	Whilst the Agricultural Land Classification (ALC) has been provided, the capability to produce crops seems to be understated. Grade 3 soils in Cambridgeshire can produce a greater range and yield of crops than a Grade 3 soils in other areas of the country. The assessment needs to reflect this.	The Applicant is not aware of any special status for Cambridgeshire soils as claimed by CCC and no evidence has been provided by CCC to substantiate this claim. The ALC system assists agricultural land use planning decisions for England and Wales. Guidance on appropriate use of ALC for England is given in Natural England document: <i>Agricultural Land Classification: protecting the best and most versatile agricultural land (TIN049)</i> (Natural England, 2009). Draft NPS EN-3 paragraph 2.48.14 sets out that <i>"The Agricultural Land Classification (ALC) is the only approved system for grading agricultural quality in England and Wales and should be used to establish the ALC and identify the soil types to inform soil management at the construction, operation and decommissioning phases."</i> The detailed ALC [APP-238] [APP-239] identifies that over 96% of the land within Sunnica East Sites A & B and Sunnica West Sites A & B is classified as poorer quality agricultural land (grades 3b & 4).

				Regarding the poorer quality land that forms the vast majority of the Order limits, NPS EN-1 paragraph 5.10.15 states that the decision maker “...<i>should give little weight to the loss of poorer quality agricultural land (in grades 3b, 4 and 5)...</i>”. This is reaffirmed by paragraph 5.11.14 of draft NPS EN-1 Which states “<i>Little weight should be given to the loss of poorer quality agricultural land (in grades 3b, 4 and 5), except in areas (such as uplands) where particular agricultural practices may themselves contribute to the quality and character of the environment or the local economy.</i>” Paragraph 2.48.13 of draft NPS EN-3 states that with regard to ground mounted solar “...<i>little weight should be given to the loss of poorer quality agricultural land (in grades 3b, 4 and 5), except in areas (such as uplands) where particular agricultural practices may themselves contribute to the quality and character of the environment or the local economy.</i>” There is therefore no special status for Cambridgeshire soils and the ALC system is the only appropriate method of assessing agricultural land quality and versatility for development planning.
CCC-12	Land use	Mitigation strategy	Soil compaction needs to be addressed via mitigation measures	Soil compaction occurs under standard arable land management. Standard arable land management includes measures to alleviate the build-up of soil compaction where necessary. Solar farm construction and decommissioning activity (separated by several decades) presents a lower risk of soil compaction as the work can be constrained to dry conditions. A Soil Management Plan (SMP) will be incorporated in the CEMP (see the commitment in Table 3-7 of [APP-123]). Further details of the SMP will be expanded upon in the updated Framework CEMP which will be submitted at Deadline 2.

				Arable operations (every year) include drawing cultivators through the soil, requiring heavy ballast on the tractor to gain sufficient traction. Arable operations may need to progress while the soil is still wet after rain, heightening the risk of compaction. Therefore, incidence of soil compaction will be dramatically reduced for the solar farm when compared to the current predominantly arable land management. Any soil compaction present following decommissioning of the solar farm can be alleviated as it would be in a typical arable rotation.
CCC-13	Heritage	Mitigation strategy	Archaeological mitigation strategy is incomplete.	Please see the response to CCC-7 above.
CCC-14	Heritage	Mitigation strategy	The Archaeological mitigation strategy is currently vague and requires development. Submission documents APP-257 Schedule of Environmental Mitigation, and APP-123 ES Appendix 16C Framework Construction Environmental Management Plan will need revising once an agreed mitigation strategy has been developed.	Please see the response to CCC-7 above. A Detailed Archaeological Mitigation Strategy will be prepared for discussion with the County Councils and submitted during the early part of the Examination. This will be finalised in accordance with a joint County Council Brief. The relevant submission documents that contain detail of the overall Scheme mitigation strategy, e.g., the Schedule of Mitigation [APP-257] and the Framework Construction Environmental Management Plan [APP-123] will be updated accordingly once this has been developed. It should be noted that the Travel Plan is not relevant for the archaeological mitigation.
CCC-15	Heritage	Site protection	An Historic Environment Management Plan should be prepared to provide a mechanism by which these sites will be suitably protected	This comment is noted. A Historic Environment Management Plan will be created and will form part of the detailed Construction Environment Management Plan to be prepared following the appointment of a contractor, prior to the start of works. The plan will detail the areas to be excluded, the construction methodology, the long-term management proposals, and any

				decommissioning phase. Table 3-2 in the Framework Construction Environment Management Plan [APP-123] contains outline details for the areas which have been removed from the developable area due to the presence of archaeology and so this commitment is already secured via the Framework Construction Environment Management Plan [APP-123] . The Landscape and Ecology Management Plan [APP-108] also contains further information. Information on the management of these sites during construction will also be set out within the Detailed Archaeological Mitigation Strategy in accordance with a Joint County Council Brief. The strategy for the Historic Environment Management plan will also be referenced in the updated Framework Construction Environment Management Plan to be submitted at Deadline 2.
CCC-16	Heritage	Mitigation strategy	Cultural Heritage – Archaeological mitigation strategy – vague and requires development	Please see the response to CCC-7 above.
CCC-17	Heritage	Removal of heritage items	Lack of provision for the removal of archaeological human remains	The text contained within the draft Development Consent Order [APP-019] is standard text. Provision for the removal of archaeological human remains will be set out within the Detailed Archaeological Mitigation Strategy, detailing the requirements for licencing, excavation, analysis and either long-term storage or reburial.
CCC-18	Heritage	Management	Clarification required regarding management of areas of archaeological protection	A Management Plan will be created and will form part of the detailed Construction Environment Management Plan to be prepared following the appointment of a contractor, prior to the start of works. This will include details regarding the management of the protection areas, along with details of the responsible parties, and what will be required should the energy farm be decommissioned and dismantled. Table 3-2 in the Framework Construction Environment Management Plan [APP-123] contains outline details for the areas which have been removed from the developable area due to the presence of archaeology and so this commitment is already secured via the Framework Construction

				Environment Management Plan. The Landscape and Ecology Management Plan [APP-108] also contains further information. Information on the management of these sites during construction will also be set out within the Detailed Archaeological Mitigation Strategy, as referenced in the Framework Construction Environment Management Plan [APP-123] .
CCC-19	Heritage/ operations	Schedule	Lack of timing provided regarding the advance archaeological programme.	With regard to evaluation of the cable corridors and Burwell National Grid substation Extension, as detailed in Paragraph 7.8.5 of Chapter 7: Cultural Heritage of the Environmental Statement [APP-039] , archaeological strip, map and record excavation is proposed along the Grid Connection routes where intrusive construction groundworks will be carried out. No archaeological works are proposed in advance of construction. Further evaluation, which would need to be undertaken in advance of construction work, is not proposed. This is largely due to the width of the proposed cable trenches, which will be no more than 3.5m wide. Although the working corridor will be wider, this is not likely to require sub-surface impact and any impact will be minimal. Use of geogrid has been discussed with the County Councils and is considered satisfactory. Furthermore, a final decision on the detail of the grid connection route and substation location has not yet been made and will be micro-sited during detailed design. This work will be within the Scheme boundary as defined in the DCO application.
CCC-20	Design	Ecology and Scheme compliance	Lack of detail about how the scheme complies with biodiversity requirements within EN-1.	Table 3-1 of Appendix 8A: Relevant Legislation and Policy for Ecology and Nature Conservation of the Environmental Statement [APP-077] , sets out where the detail of how the Scheme complies with the biodiversity requirements with NPS EN-1 is located. For each relevant paragraph of the policy statement, a cross reference is given to where the information is provided.

				In addition, Section 6.6 of the Planning Statement Part 1 [APP-261] sets out an appraisal of the Scheme's accordance with planning policy that concerns biodiversity, including relevant policies of NPS EN-1. Table 5 of Appendix B to the Planning Statement Part 1 [APP-261] sets out a policy-by-policy appraisal of the Scheme's accordance with relevant paragraphs of NPS EN-1 (and other applicable policy documents) that concern biodiversity.
CCC-21	Ecology	Impact	Impact to Chippenham Fen and Snailwell Poor's Fen lacks justification. The scheme will result in adverse impact to functional land of the Brecklands Special Protection Area (SPA) and its population of Stone Curlews (for which it is designated). It is unclear why the scheme has not been designed to avoid destruction of Stone Curlew habitat.	Both direct and indirect impacts to Chippenham Fen and Snailwell Poor's Fen designated sites are addressed in Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] and the Habitats Regulations Assessment - Report to Inform an Appropriate Assessment [APP-092] , including changes to hydrology and water quality. It is acknowledged that construction activities will occur within 100m of the Fen and, therefore, specific mitigation measures have been embedded to prevent indirect impacts, such as dust generating activities (paragraph 8.8.27 and Table 8-9 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040]) and construction noise and lighting (Table 8-9) and will be secured through the Framework Construction Environmental Management Plan [APP-123] . Table 8-9 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] sets out the potential impacts to these designated sites and explains and justifies why there will be no direct impacts. The same table also considers indirect impacts during construction, including surface water pollution and groundwater contamination, making reference to assessments provided in Chapter 9: Flood Risk, Drainage and Water Resources, of the Environmental Statement [APP-041] and the Water Framework Directive Assessment [APP-094] and construction noise (Appendix 11D – Construction Noise Modelling of the Environmental Statement [APP-112] and Figures 11-2 and 11-3 of the Environmental

				Statement [APP-234] [APP-235]). These assessments conclude that there will be no significant effects on the Chippenham Fen designated sites from construction. There are no pathways (e.g. habitat loss or disturbance to designated site features such as through noise, water quality, air quality, lighting or visual), during operation of the Scheme which could affect these statutory designated sites. There will be no lighting of the perimeter fence at Sunnica West Site B and maintenance visits will be undertaken as outlined in Framework Operation Environmental Management Plan [APP-126] and secured through the draft DCO [APP-019]. Table 8-9 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] also considers the impacts of attraction to the solar panels for aquatic invertebrates, identifying the species included on the citations for the designated sites and provides justification as to why there will be no significant effects, based on species ecology, existing vegetation and location and orientation of the panels. The assessment of the impacts of Stone Curlew occurring outside the Breckland SPA is presented in Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040]. Section 5.3 of the Habitats Regulations Assessment - Report to Inform an Appropriate Assessment [APP-092] describes the fluid distribution of Stone Curlew within farming landscape of the Order limits and how the species is reliant on the cropping regime in any given year to provide suitable areas of fallow and spring-sown crops to be able to nest. As detailed in Section 1.8 of Appendix 10I, Landscape and Ecology Management Plan of the Environmental Statement [APP-108] and Offsetting Habitat Provision

				for Stone-Curlew Specification [APP-258], the Scheme has embedded sufficient areas within the Scheme design to offset any potential reduction in arable farmland, that may, in any given year, be used by Stone Curlew and avoid a net reduction in breeding and foraging opportunities for the species. The areas embedded within the Scheme design for offsetting impacts on Stone Curlew utilise the species' current and historical distribution across the Order limits. Therefore, since this replicates the conditions the birds are already utilising, it is considered a suitably robust approach informed by empirical information on the nesting behaviour of the specific Stone Curlew pairs in question in this landscape. Furthermore, the habitat, including nesting plots, has been designed and will be delivered following what has been successful with the other similar habitat and nesting plots around the Breckland area. The provision of this habitat will ensure no net loss of breeding territories within the Order limits and the Scheme will result in no adverse effect on the integrity of the Breckland SPA.
CCC-22	Ecology	Impact	Proposed mitigation measures to Havacre Meadows and Deal Nook County Wildlife Site are inadequate	Havacre Meadows and Deal Nook CWS (14.1 ha) is within the footprint of the Grid Connection Route A2. The site qualifies as a Country Wildlife Site (CWS) because it is over 10 ha in size and contains semi-improved grassland, woodland, scrub and open water in close association. The willow carr of the NVC Alder - Stinging Nettle woodland community (W6), qualifies as a CWS in its own right. Table 8-9 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] considers the impacts of the Scheme on the CWS. There will be no direct impacts on any of these habitats and

				measures will be put in place to prevent incursion during construction, e.g. security fencing and buffer zones early on in the construction process. The construction of the Scheme for the Grid Connection will utilise non-intrusive methods for crossing the CWS, including the River Kennett and as such, will not directly impact habitats within the CWS This is secured in the Framework Construction Environmental Management Plan [APP-123]. Boundary vegetation, such as hedgerows connecting woodland sites will be retained, which will allow for connectivity across the Order limits. Impacts on watercourses, including the River Kennett, are also considered in Chapter 9: Flood Risk, Drainage and Water Resources, of the Environmental Statement [APP-041] and the Water Framework Directive Assessment [APP-094]. Tables 3-3 and 3-4 of the Framework Construction Environmental Management Plan [APP-123] set out the measures which will be secured to protect designated sites and watercourses during construction.
CCC-23	Design/ Ecology/ Renewable energy and climate change	Assessment	Assessment of BESS fire safety measures on watercourses, hydrologically linked wildlife sites, wetland habitats and associated species is inadequate.	Annex F Drainage Technical Note of the Flood Risk Assessment Rev 1 [AS-010], outlines the proposed surface water drainage strategy. This notes in paragraph 3.6.6 and Section 3.10 (Fire Water Runoff) that firefighting water, and its potential contaminants would be contained within a separate lagoon structure and removed from it via controlled methods (e.g. a tanker) if the water is polluted. Therefore, it will not drain into the surface water drainage network without prior testing to confirm it is clean water. Paragraph 9.7.61 of Chapter 9: Flood Risk, Drainage and Water Resources of the Environmental Statement [APP-041] explains the approach to managing fire risk at the three BESS compounds. It is not anticipated that active firefighting would be undertaken as this can

				spread chemicals used in the process and which are potentially harmful to the water environment. Instead, any apparatus or containers that catch fire will be allowed to burn out. Water stored on site in steel tanks will be sprayed onto adjacent containers to keep them cool and reduce the risk of the fire spreading. The water used would be directed to the fire water storage lagoons (with capacity greater than the water stored on site for controlling the spread of a fire) from where decisions about suitable disposal can be made post incident (e.g., to pump out to tankers for removal and disposal at a suitable licenced waste facility off-site). As such, there would be no direct pathway to any watercourse and a neutral impact was predicted on relevant receptors (alongside diffuse urban runoff risks as a whole) (see paragraph 9.8.173 to 9.8.177 in Chapter 9: Flood Risk, Drainage and Water Resources of the Environmental Statement [APP-041]). It should also be recognised that a fire would be an unlikely event rather than an ongoing impact. The draft Development Consent Order [APP-019] includes requirement 7 in Schedule 2 which secures the Battery Fire Safety Management Plan ("BFSMP"). The BFSMP is to be approved by the relevant planning authorities, in consultation with the fire and rescue services.
CCC-24	Ecology	Loss of habitat	The scheme does not adequately avoid, mitigate or compensate the losses of priority habitat.	The Applicant respectfully disagrees with this statement and considers that it has adequately avoided, mitigated and compensated its impacts. In particular: As set out in paragraph 8.10.5 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] construction activities are predicted to result in the direct loss of or damage to just 0.8 ha of semi-improved acid grassland. This should be seen in the

				context that land has been embedded within the Scheme design for creation of 30.9ha of dry acid grassland on current arable land. 6.4ha of unimproved and 5.0ha of semi-improved acid grassland will be retained and protected during construction. Further to this, the area of acid grassland to be lost will be subject to a translocation, with the turf and topsoil stripped and translocated to a suitable area within the mitigation zone in Sunnica East Site B. This will help consolidate the existing fragmented areas of acid grassland retained within Sunnica East Site B and aid the reversion from arable farmland. As set out in paragraph 8.10.7 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] construction activities are predicted to result in the direct loss of arable habitats, supporting notable arable flora in their field margins. However, the following areas within the Order limits, where notable species were recorded, will be managed for arable plants (refer to the illustrative parameter plans (see Figures 3-1 and 3-2 of the Environmental Statement [APP-135] [APP-136]): Sunnica East Site B: 4 3x20m wide strips in field E30 and 4 3x10m wide strips in field E17/18 Sunnica West Site A: 3 3x10m wide strips in field W09. The creation and management of these plots is set out in paragraph 8.8.10 7 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040]. As set out in paragraph 8.10.20 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] construction activities will result in the direct loss of 0.2ha of marshy grassland, however, 11.9ha of current arable land has been embedded within the Scheme for creation of marshy/tussocky grassland.

				Construction activities will result in the direct loss of small sections of hedgerow and recently planted hedgerow, i.e., less than 4 years old (paragraph 8.10.27 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040]). All other priority habitats will be retained and appropriately protected (see section 8.8 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040]), with no significant effects occurring.
CCC-25	Ecology	Protected species	The scheme does not provide sufficient details to determine whether adverse impacts on protected species will be adequately mitigated / compensated.	With reference to Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] , protected species identified as part of the detailed baseline surveys are reported in Tables 8-7 and Table 8-8, with an assessment of likely impacts and effects undertaken in Section 8.9. Paragraphs 8.8.17-8.8.23 and 8.8.28 set out avoidance and mitigation measures for protected and notable species.
CCC-26	Ecology	Impact on invertebrates	Adverse impact to invertebrates from solar panels has not been adequately assessed / justified.	The loss of habitat supporting notable terrestrial invertebrates has been assessed in paragraphs 8.10.9-8.10.10 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] and concludes, with the implementation of mitigation, no significant effects. No further impacts to terrestrial invertebrates are predicted, as all other areas of potentially valuable habitat will be retained. With the creation of grassland within and around the arrays, the Scheme will have a positive effect on terrestrial invertebrates over the lifespan of the Scheme. Paragraph 1.7.29 of the Landscape and Ecology Management Plan [APP-108] sets out how the Scheme will align with and contribute to Buglife's B-Lines project, providing landscape scale benefits for pollinators through increased habitat provision and connectivity. Annex C sets out the indicative grass mixes to be sown across the Scheme and grazing regimes for management. Areas

				designated for conservation grazing have been incorporated to link in with the B-Lines project through allowing diverse grasslands to establish and be managed for the benefit of pollinators. With regard to important aquatic invertebrate species and assemblages associated with Chippenham Fen, the justification for no adverse effects is provided in Table 8.9 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] This explains that the species are unlikely to fly at heights where the solar panels are visible and when considered in the context that the solar panels will be located approximately 200m from areas of wetland within Chippenham Fen, be south facing, i.e. away from the fen and there is an existing mature tree line between the Order land and fen, winged adults are unlikely to interact or be attracted to the panels.
CCC-27	Ecology	Biodiversity net gain	It is not possible to determine whether or not the scheme will deliver Biodiversity Net Gain (or at least no net loss) during either the operational or decommissioning phases.	The Biodiversity Net Gain Assessment [APP-259], using Defra's Biodiversity Metric 3.0, concludes that the Scheme will result in approximately 83% gain of habitat units, approximately 16% gain in hedgerow units and approximately 1% gain of river units. The Council's comments and concerns regarding the calculation of biodiversity net gain (BNG) have been noted. These will be taken into consideration as part of an updated calculation of BNG which also include such aspects as follow up surveys for some habitats. A technical note will be produced and circulated at the earliest convenience during the Examination process providing the detail as requested for the calculations using the latest BNG metric 3.1.
CCC-28	Construction/ Ecology	Biodiversity mitigation	The Construction Environmental Management Plan (CEMP) does not provide sufficient details to demonstrate that	The information set out in the Framework Construction Environmental Management Plan [APP-123] provides a sufficient framework for the DCO submission, to demonstrate that risks to ecological receptors during

			biodiversity will be adequately mitigated through the construction phase.	construction can be mitigated. Further detail will be added into the CEMP after consent and at the detailed design stage, in consultation with CCC.
CCC-29	Ecology	Biodiversity mitigation	The proposed landscape scheme does not demonstrate how the scheme will deliver adequate biodiversity mitigation / compensation and deliver biodiversity net gain.	Appendix 10I, Landscape and Ecology Management Plan of the Environmental Statement [APP-108] sets out the framework for delivery of the landscape scheme and how biodiversity design has been incorporated. This will be developed further at the detailed design stage of the DCO process, however, details of creation, management, maintenance and monitoring are set out in section 8.8 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] and section 1.8 of Appendix 10I, Landscape and Ecology Management Plan of the Environmental Statement [APP-108]. The Biodiversity Net Gain Assessment [APP-259], using Defra's Biodiversity Metric 3.0, concludes that the Scheme will result in approximately 83% gain of habitat units, approximately 16% gain in hedgerow units, and approximately 1% gain of river units.
CCC-30	Decommissioning/ Ecology	Biodiversity impact	The Decommissioning Environment Management Plan (DEMP), provides insufficient details of the decommissioning phase to determine whether the scheme will result in long-term adverse impact on biodiversity. For example, no landscape masterplan has been submitted to show what habitats will be retained. The Council is concerned there is no long term management / monitoring for these habitats, as well as any compensatory habitat / reinstatement of original habitats created as part of the decommissioning phase.	The Scheme will not remove Landscape enhancements at the point of decommissioning and only the infrastructure elements of the Scheme would be removed, as set out in the Framework Decommissioning Environmental Management Plan [APP-125] . If after decommissioning, when the land is no longer under the control of the Applicant nor covered by this consent, a landowner decides to remove vegetation, this would be subject to applicable planning or licensing requirements as appropriate at that point in time.

CCC-31	Water resources	Infiltration	Infiltration testing has not been undertaken to assess the feasibility for the disposal of surface water.	It is worth keeping in context that unlike typical urban developments that collect surface water runoff and direct it to a single point of discharge, precipitation on the majority of the site will simply runoff solar panels to ground as it does currently. A review of BGS online records indicates that the site geology characteristics would likely be suitable for infiltration, and the strategy is based on this evidence. Within Annex F: Drainage Technical Note of the Flood Risk Assessment Rev 1 [AS-010] , the proposed surface water drainage strategy is outlined. Paragraph 3.1.1 states the proposed surface water drainage strategy for the Scheme areas is to mimic the natural drainage conditions of the site as much as possible. The infiltration swales are proposed to be 600mm deep to mitigate potential shallow groundwater being encountered. The infiltration testing will be undertaken at detailed design once a detailed layout is confirmed to establish suitable infiltration locations; however, a conservative (anticipated worst case) rate of $1 \times 10^{-5} \text{m/s}$ has been used in the assessment interpolated from Table 25.1 of the CIRIA SuDS Manual. The FRA drainage strategy in Annex F of the [AS-007 to AS-010] has assessed impacts to SAC / SSSIs and consider this strategy has no adverse material impact to the hydrological regime.
CCC-32	Water Resources/ Location	Boundary lines	Delineation of Cambridgeshire and Suffolk boundary is unclear.	As part of the Applicant's response to the s51 advice Figure 9-1 [AS-011] has been updated with the administrative boundaries clearly delineated.
CCC-33	Water Resources	Quick Storage Estimates	Request from LLFA that the maximum level of the QSE is used assuming a worst-case scenario.	Within the Flood Risk Assessment Part 1 Rev 1 [AS-007] , the infiltration SuDS techniques, i.e., swales and basins, will be designed to mimic existing drainage conditions and also accommodate the 1 in 100 year return period storm event, including for a 40% increase allowance for climate change. The drainage strategy (Annex F of the FRA [APP-098]) has been assessed on the averages for QSE values, based on generally accepted experience that the average value is likely to

				be closer to the detailed design values. The maximum QSE volume is not a requirement to meet for design but a guide for establishing an outline drainage assessment to guide initial design parameters, which this is suitable to use for the outline strategy. The site is not space limited, if additional attenuation is required, it would be provided within the site boundary.
CCC-34	Water Resources	Hydraulic modelling	Model is not available for review	The Flood Risk Assessment Part 1 Rev 1 [AS-007] uses data produced by the Environment Agency. No site specific hydraulic fluvial modelling has been carried out as part of this assessment. The current Environment Agency model has been reviewed. The revised climate change allowances are 19% for design purposes, the Environment Agency model includes 20% climate change allowance. The Environment Agency has stated during consultation that this should be acceptable. For the outline design, no hydraulic drainage modelling has been undertaken for the drainage assessment. It is an outline assessment based on 100% Greenfield land; therefore, greenfield runoff assessment calculation using HR Wallingford assessment tool has been used as the existing runoff rates. A hydraulic drainage model will be prepared for the BESS and Site Compound areas once these design layouts are confirmed at detailed design stage, with the results helping to inform the final detailed drainage design. Catchment level Greenfield runoff rates, with an allowance for climate change, will be used for solar panel sites to confirm swale design and sizes. The modelling will ensure the principles of the drainage strategy are followed and this will not affect the Environmental Statement findings and conclusions.

CCC-35	Water Resources	Compensation	No flood zone compensation appears to have been proposed within the scheme.	The Flood Risk Assessment Rev 1 [AS-007 to AS-012] has assessed the potential for the Scheme to impact flood risk on or off the site. Paragraph 4.3.8 concludes that the legs that support the solar panels are <100mm in diameter and pose no increased risk to flood risk and therefore do not require compensation (with regards to the River Lark floodplain). Solar inverter stations occupy approx. 4m³ per station and thus have a negligible impact on floodplain volume within the rural catchment. Development within the Order limits will not increase the existing flood risk on or off site as a result of the development proposals. However, during a meeting with the Environment Agency on 7th March 2022, the need for more discussion over the potential for the need for floodplain compensation and corresponding hydraulic modelling was highlighted. The Applicant is currently undertaking further modelling, the technical scope of which has been agreed with the Environment Agency, and consultation with them is continuing. The Applicant's position being that the assessments show that no floodplain compensation is required. The results of the modelling will be shared with the Environment Agency and the drainage bodies when available.
CCC-36	Water Resources	Drainage layout	More detailed drainage layout plan requested to show the different SuDs features across the site.	As stated in Annex F Drainage Technical Note of the Flood Risk Assessment Rev 1 [AS-010], paragraph 3.1.3, detailed drainage designs and SuDS feature locations will be determined post consent at detailed design stage. Paragraph 3.1.4 refers to general arrangement drawings [WPP-ACM-XX-DR-C-ZZ-001 to 008] which show the outline location of these SuDS features. The exact location to be confirmed at detailed design stage, post consent. These drawings are included within Sub-Annex F of the Flood Risk Assessment Part 4 Rev 1, Drainage General Arrangements [AS-010]. However, as per

				Requirement 12 of the draft DCO [APP-019] , CCC will be responsible for determining whether or not to approve the detail of the drainage strategy at the detailed design stage, if development consent is granted.
CCC-37	Water Resources	Exceedance plans	Plans demonstrating the exceedance routing of surface water in the event of system exceedance or system failure should be provided.	As stated in Annex F Drainage Technical Note of the Flood Risk Assessment Rev 1 [AS-010], paragraph 3.1.3, states that drainage plans will be developed at detailed design stage. However, as per Requirement 12 of the draft DCO [APP-019], CCC will be responsible for determining whether or not to approve the detail of the drainage strategy at the detailed design stage, if development consent is granted. These will include the exceedance flow routes, once Site Compound and BESS areas are detailed to assess exceedance flow paths. However, exceedance flows are not anticipated to alter existing routes, post development, with solar sites not impeding overland flow routes.
CCC-38	Water Resources	Maintenance tracks	No details are currently provided on the maintenance tracks around the solar farm and how water will be managed from these surfaces.	The maintenance tracks are proposed to be permeable with no increase in runoff (i.e. the tracks are proposed to be compacted stone which will be permeable via natural voids in the stone surfacing).
CCC-39	Landscape and Visual Amenity	Impact	Concerns for the impact of the scheme on the landscape	The Landscape and Visual Impact Assessment (LVIA) set out in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] summarises the effects on the landscape in detail, from the national scale, through regional, county, district and neighbourhood scales to local landscape character areas defined by the Applicant. It is acknowledged that there will be broad-scale change to the character of the landscape at the site level and within parts of the Rolling Estate Chalklands landscape character type (LT) defined within the Suffolk Landscape Character Assessment 2010 within Appendix 10D - Published Landscape

				Chapter Extracts of the Environmental Statement [APP-103]. Effects on some receptors would be significant at construction and year 1 of operation, reducing in the most part to not significant at year 15 of operation. Residual significant effects are predicted for some landscape receptors at year 15 of operation, particularly relating to intra project effects, as set out in Appendix 10G of the Environmental Statement [APP-106]. The Scheme has been designed to retain the existing landscape pattern and features as far as possible and effects on landscape character will be localised. Whilst it is acknowledged that some key characteristics, such as openness, will change, the majority of key characteristics will be retained. For example, within the Rolling Estate Chalklands LT, the large uniform fields enclosed by low hawthorn hedges and shelter belt planting will be retained and the clustered villages with flint and thatch vernacular houses and many new large “prestige” homes in villages will not be altered.
CCC-40	Land use	Soil surveys	Further evidence on soil surveys should be provided for underground cabling and access routes	Soil surveys of cable routes will be undertaken as part of the SMP for construction and decommissioning. The SMP will be prepared and approved as part of the CEMP (to be approved by DCO requirement). Further details of the SMP will be provided in an updated Framework CEMP [APP-123] which will be submitted at Deadline 2.
CCC-41	Land use	Agricultural Land Classification results	The campaign group did not have access to the land to verify the ALC results.	Three separate ALC surveys make up the assessment cover of the Sunnica site. There is no conflict between these three assessments and no deficiency has been identified. Without any area of concern that they wish to verify, the Applicant does not see a justification for the campaign group to repeat intrusive soil survey work in the farmers' fields. Access to enclosed, arable land for the purposes of conducting intrusive survey work is a matter for landowners. The campaign group have not

				been prevented from accessing the land by the Applicant. Natural England is the statutory consultee regarding planning applications for best and most versatile agricultural land. It has not identified any deficiency in the ALC assessment.
CCC-42	Land use	Soil capability	Concerns that Grade 3 soil yield has not been assessed properly.	Yield is not a criteria for ALC assessment. An ALC assessment is based on the inherent quality and versatility of the land, independent of the type or standard of agricultural land management. Yield is subject to the standard of land management, varies with uncontrolled factors such as weather, and can be influenced by variations in crop value, input costs and environmental measures. An assessment of yield would be a poor measure of agricultural land quality and versatility in the planning system. Draft NPS EN-3 paragraph 2.48.14 sets out that <i>"The Agricultural Land Classification (ALC) is the only approved system for grading agricultural quality in England and Wales and should be used to establish the ALC and identify the soil types to inform soil management at the construction, operation and decommissioning phases."</i>
CCC-43	Land use	Food production	The loss of land capable of food production is less well documented by Sunnica and should be assessed as a percentage of each type of soil in the county	Natural England document TIN049 provides guidance on the application of ALC to inform planning decisions concerning agricultural land. There is no planning guidance on the conservation of a specific soil type. The Applicant has provided a detailed ALC assessment that considers the quality and versatility of the agricultural land. There are no county wide assessments of ALC grade using the current ALC methodology, so it would not be possible to provide the assessment requested.

				The detailed ALC assessment [APP-238] [APP-239] identifies that over 96% of the land within Sunnica East Sites A & B and Sunnica West Sites A & B is classified as poorer quality agricultural land (grades 3b & 4). Regarding the poorer quality land that forms the vast majority of the Order limits, NPS EN-1 paragraph 5.10.15 states that the decision maker “...<i>should give little weight to the loss of poorer quality agricultural land (in grades 3b, 4 and 5)...</i>”. This is reaffirmed by paragraph 5.11.14 of draft NPS EN-1 which preserves the existing guidance of EN-1 para 5.10.15 as given above. Draft NPS EN3 para 2.48.13 also recommends that ground mounted solar should avoid the best and most versatile cropland where possible, but also concludes “<i>However, land type should not be a predominating factor in determining the suitability of the site location.</i>” The dominant limiting factor restricting ALC grades to 3b and 4 is drought. This is as the light soils on this land hold little plant available water, significantly compromising the quality and versatility of the land for crop production. Irrigation is used but water supply is strictly rationed by the Environment Agency and is further curtailed in response to drought. With a growth in demand for the same limited water stock by non-agricultural consumers, the long-term trend is of declining availability of water for irrigation. For the duration of the solar energy farm, there will be no irrigation. Landowners with abstraction licences will be able to use this water volume elsewhere or trade it with other users on the same aquifer.
CCC-44	Land use/ construction	Soil compaction from	We disagree that the effect of construction traffic on soil compaction will be similar to agricultural vehicles and require mitigation measures to be in place to address soil	See paragraph 12.7.3 of Chapter 12: Socio-economics and Land Use of the Environmental Statement [APP-044] .

		construction vehicles	compaction on sites during construction, operation and decommissioning	The potential for compaction from arable exceeds that from construction and decommissioning works. Tractors must be heavily ballasted to have sufficient traction to draw cultivators through the soil. Combine harvesters are large and heavy plant, that offload in the field to grain trailers with high axle loads. Such loads every year of arable management will exceed the potential for compaction from the two periods of construction and decommissioning. Furthermore, the cultivation and harvest work is time sensitive and so may need to progress while soil has heightened vulnerability to compaction following rainfall.
CCC-45	Acquisition/ other	Cumulative impact	Lack of consideration to the cumulative impact of solar farms in the area	The cumulative schemes considered are included in Appendix 5A of the Environmental Statement [APP-055]. Cumulative effects are assessed for each environmental topic area within each specialist chapter of the Environmental Statement [APP-038 to APP-048]. Cumulative effects are also considered within Chapter 17, Effect Interactions of the Environmental Statement [APP-049]. The list of cumulative projects to be assessed was provided to CCC prior to submission and CCC did not request any further projects to be included. Therefore, the Applicant is currently undertaking further engagement with CCC in order to understand the additional requirements of CCC for the cumulative assessment at this stage. An assessment of the cumulative effects of the proposed Breach Solar Farm (21/00706/ESF) has now been made and is included in Appendix A of this Relevant Representations response document.

CCC-46	Design	Impact assessment	Applicant has failed to conduct a detailed assessment of the impact of the proposal at the construction, operation and decommissioning stages on the horse racing industry.	The assessment of effects as presented in the Environmental Statement has taken into account the potential for effects on relevant receptors within the horse racing industry. Within Chapter 12: Socio-economics and Land Use of the Environmental Statement [APP-044], consideration has been given to effects on receptors as businesses that might experience direct land take or indirect impacts such as from traffic or disturbance. This includes Godolphin Gallops and Limekilns Gallops. The assessment concludes that there would be no significant effects on these businesses. Also effects on users of public rights of way which might include equestrian users from temporary and permanent impacts on these have been assessed and again no significant effects are expected. Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] includes an assessment of effects on the views and visual amenity of people training horses. People training racehorses are focused on their activity. It is recognised that the landscape context and setting is important to these views. No development is proposed within the land associated with these facilities, but the Scheme does have the potential to affect its setting as set out in the assessment of landscape effects [APP-106]. People working at and visiting the Snailwell/Godolphin Gallops are represented by viewpoints VP39b and VP39c. Despite the proximity of Sunnica West Site A to the Snailwell Gallops, effects on the views of people working and visiting there are assessed as not significant in all scenarios. This is because of the substantial, dense belt of existing trees and shrubs which line the eastern boundary of the Snailwell Gallops, which will screen the majority of the Scheme. Further mitigation is proposed within a section of approximately 350m where this

				vegetation is less dense, which coincides with the location of a runway of the former RAF Snailwell. A temporary fence will be erected in this location while proposed planting establishes. Horses training on the Snailwell Gallops run parallel to this vegetation, uphill from close to the bridge carrying bridleway 204/5 across the A14, where the land lies from approximately 25m Above Ordnance Datum (AOD) towards Snailwell at approximately 40m AOD. Equestrian users of the Jockey Club and members of the public whom informally view the horses between breaks in the roadside vegetation are represented by viewpoint 38. The Limekilns Gallops, which extend to approximately 80 ha, are separated from the Scheme by the busy A14 trunk road and the Cambridge to Ipswich railway line, which runs parallel to the south. This facility is used during the summer and includes the Golden Mile, Long Gallop, Short Gallop and Round Gallop. The land rises from approximately 30m AOD in the north to 60m AOD in the south, with the highest point and most open views towards the site available along the edge of the Limekilns Gallops, parallel to Well Bottom (B1506). These views north towards the site are from within the Limekilns Gallops or from small gaps in the tall, dense roadside hedgerow, where owners and trainers observe racehorses training. Horses in this section of the Limekilns Gallops train east/west, parallel to the B1506. Views of the site quickly reduce in extent on descending the hill towards the A1304, which divides the gallops. This is evident from the combined ZTV shown in Figure 10-11f [APP-206], which has been updated to correct the Order limits upon which is based and is included with the Deadline 1 Examination deliverables issued to the ExA. This figure indicates that parts of both Sunnica East and Sunnica West are visible from the top of the hill but

				views from the bottom of the hill are limited to parts of Sunnica West Site A. Effects on views are assessed as moderate adverse in all scenarios, which is considered significant. This is principally driven by the extent of development visible from the top of the hill within Sunnica West Site A, which will be visible across the central part of the background, beyond the A14. Planting is proposed as mitigation along the southern edge of Parcels W05 and W07 to soften views. However, given the elevation of the viewpoint in relation to the lower lying site, this will not have grown sufficiently by year 15 of operation to screen views of the solar panel arrays and associated infrastructure. In summary, for the majority of people involved in training racehorses, views of the landscape are secondary to their activity, which is their main focus. From the Snailwell Gallops, the Scheme would be mostly screened by existing vegetation. The wider landscape, which includes parts of the DCO site, forms a broader backdrop to views from the higher ground of the Limekilns Gallops north east of Newmarket. The Scheme will be visible in places across this background, beyond the busy A14 trunk road and softened by existing vegetation and planting proposed as mitigation for the Scheme.
CCC-47	Transport and access	Consultation	Consultation by the applicant on transport matters has been minimal.	The Applicant respectfully disagrees. Pre-PEIR consultation was undertaken with both LHAs for the PEIR (July 2019). Post PEIR and pre-Environmental Statement, two meetings were held with the LHAs (March & August 2021) with detailed presentations on methodology, and an additional meeting held with National Highways (May 2021) which identified the approach for the ES. The Applicant is keen to continue discussions with CCC through the SoCG.

				Following the submission of the PEIR and the response received, Chapter 13: Transport and Access of the Environmental Statement [APP-045] , the Transport Assessment [APP-117] and Framework Construction Traffic Management Plan & Travel Plan [APP-118] underwent significant updates with historic traffic flows obtained for inclusion within the ES and with further work carried out at the request of the LHAs, for example, traffic speed surveys.
CCC-48	Transport and access	Detail and impact assessment	The current DCO and supporting documents contain insufficient detail to assess the impacts upon the highway network and the general travelling public.	The Applicant respectfully disagrees. Driver Delay has been determined through the analysis of the changes in traffic flows compared to the baseline traffic flows which is contained within the Transport Assessment [APP-117] . Chapter 13: Transport and Access of the Environmental Statement [APP-045] and the Transport Assessment [APP-117] identifies the peak and average daily forecast trip generation during the construction period. These identify the absolute and percentage change in traffic flows and provides a comparison of the traffic flows to the network peak hours. In addition, peak and average HGV movements to the Sunnica East Site A and B and Sunnica West Site A and B site accesses are provided on the local highway network. The Traffic Regulation Measures Plans – Temporary Road Closures [APP-009 to APP-011] and Traffic Regulation Measures Plans – Temporary Measures [APP-012 and 013] identify the proposed temporary speed limit reductions and temporary traffic signals to provide safe entry and egress to the construction site accesses. Consideration has also been given to AILs and cranes and requirements needed to accommodate these vehicles.
CCC-49	Transport and access	Detail and impact assessment	The information provided is largely comprised of generic information with little site specific detail. It is therefore difficult for the Local Highway Authority (LHA) to understand the likely impacts and make an informed view in relation to the proposed scheme.	The Applicant respectfully disagrees. Information provided in the transportation documents relates to the highway network in the vicinity of the Scheme including the local roads, A11 and A14. Details of the HGV trip generation for each of the Sunnica East Site A and B and Sunnica West Site A and B construction site

				accesses are provided for the peak and average daily vehicles. The peak and average daily construction staff vehicles are also provided with details regarding the trip generation, trip distribution and trip assignment onto the local highway network. A review of each of the specific site accesses was undertaken which identified the visibility splays based on the national speed limit of the roads, swept path analysis of a 16.5m articulated lorry and a 22.6m long crane where necessary, identifies the proposed access strategy for the construction site accesses which includes temporary speed limit reductions and traffic signals to provide safe entry and egress.
CCC-50	Transport and access	Traffic flows	As far as can be determined traffic flows (including deliveries and muck away vehicles) have not been provided for each individual access (including those on the cable route) so it cannot be determined if the locations of compounds and accesses are appropriate, feasible or if mitigation works are needed.	The forecast HGV trip generation for the individual Sunnica East Site A and B and Sunnica West Site A and B site accesses are provided for peak and average vehicles. For the Grid Connection Route A and B it is not possible at this stage of the project to identify the number of HGVs required at each of the site accesses given the number of site accesses and the length the Grid Connection Route corridor covers. However, the number of staff vehicles for each access is expected to be an average of six and maximum of eight per day. It is therefore reasonable to treat each of these accesses as occasional and temporary. On this basis, indicative site access junction layouts are provided within the Framework Construction Traffic Management Plan and Travel Plan [APP-118] which includes swept path analysis (vehicle tracking).
CCC-51	Transport and access	Traffic levels	Where site specific information is provided, it does not provide the necessary local detail, and it cannot be determined whether existing highways are geometrically adequate to cater for the intended traffic levels, whether the access arrangements proposed are adequate	The Applicant respectfully disagrees. For example, the Traffic Regulation Measures Plans - Road Closures [APP-009 to APP-011] and the Traffic Regulation Measures Plans - Temporary Measures [APP-012 and APP-013] identify the proposed temporary speed limit reductions, proposed temporary traffic signals and temporary road closures which all form part of the

			and safe, or whether off site mitigation is needed.	mitigation to provide safe entry and egress to the construction site accesses. The information provided in the Annex of the Framework Construction Traffic Management Plan and Travel Plan [APP-118] is supplementary information that was used in the initial site access review and outlines the visibility splay requirements based on 60mph (100kph) speed limit and uses Google Earth aerial imagery to provide clarity in rural locations with few discernible landmarks. The mitigation proposed has been undertaken on a mixture of available topographical survey mapping and OS mapping. The proposed temporary speed limit reductions and temporary traffic signals are proposed to limit the amount of vegetation removal/trimming required to create the site accesses and also to provided safe entry and egress to the construction site accesses without large amounts of vegetation trimming/removal as the construction site access are only required for a short period of time. Notwithstanding the point that a significant level of information is provided, the Applicant notes CCCs representation and have discussed whether signposting to the information or consolidated presentation of access design information can be provided, and will seek to address this.
CCC-52	Transport and access	Internal arrangements	CCC are unable to locate specific details of internal arrangements such as internal tracks, buildings, loading area, turning provision etc.	Internal tracks are identified indicatively on Figure 3-1 and Figure 3.2 of the Environmental Statement [APP-135] [APP-136] for the Sunnica East Parameter Plans and Sunnica West Parameter Plans respectively. In addition, construction and permanent compounds are provided on Figure 3-19a and 3-19b of the Environmental Statement [APP-159] [APP-160]. However, the specific design and location (save for the compounds and buildings which are controlled by the limits of deviation on the Works Plans) of the specific

				elements raised will be determined at the detailed design stage.
CCC-53	Construction	Construction traffic schedule	The application documents appear to lack a schedule of proposed works meaning it is not possible to meaningfully review the impacts of the scheme. For example, the Works Plan (EN010106/AAP/2.2) and 2.3 Access and Rights of Way Plan indicates broad areas of highway works, but do not clearly indicate what these works comprise to enable full consideration of whether the works are acceptable in layout, geometry, and safety terms. It is yet to be determined if the works are feasible within the constraints of the public highway or land within the applicant's control.	The construction related works to be undertaken are listed in Schedules 1, 4 and 7 of the draft DCO [APP-019] , with further information provided in the Framework Construction Traffic Management Plan and Travel Plan [APP-118] which demonstrates that such works can be undertaken in acceptable terms. Articles 9 and 10 of the DCO provide the mechanisms for CCC to be involved in the further detail of these access works.
CCC-54	Transport and access	Construction staff transport	References are made to a minibus for construction staff, but there is no supporting detail relating to routing, frequency, stop locations etc.	The exact locations of the construction staff are currently unknown. Once the locations of the construction staff are known then a mini-bus service to local residential areas will be investigated to transport to/from the site to reduce the number of construction staff vehicle trips. It should be noted that the assessment does not rely on the provision of a minibus service, meaning that assurance is not required as to specific arrangements. However, a provision of mini-bus services would reduce the number of construction staff vehicles travelling to/from the two car parks and therefore reduce the impact presented in the Environmental Statement.
CCC-55	Transport and access	Internal route details	7.2.30 of Appendix 13C indicated that staff will be transported from the main site car parks to other site compounds on internal routes where possible but provides no detail to support what will be achievable internally, nor provide details the impact that internal	Internal tracks are identified on Figure 3.1 and Figure 3.2 of the Environmental Statement [APP-135] [APP-136] for the Sunnica East Site A and B Parameter Plans and Sunnica West Site A and B Parameter Plans respectively. A peak number of 59 external mini-buses (single direction) are identified in the Framework Construction Traffic Management Plan and Travel Plan

			movements may have on the use of accesses along the cable route.	[APP-118]. The mini-bus trips will occur outside of the development and network peak hours and therefore is not considered to have a significant effect on the local highway network. The Grid Connection Route A and B are forecast to require an average of six construction staff per day with a maximum of eight staff per day. Therefore, the impact of the construction staff vehicles associated with the Grid Connection Route A and B is considered to be negligible.
CCC-56	Transport and access	Access design	A certain level of detail should be provided at this time such that the impact of the proposals on the Local Highway network can be determined, and indeed whether the works proposed are adequate and deliverable to mitigate the impact of the development. At a minimum, designs for access and all mitigation within the highway should be provided, supported by the necessary supplementary information.	The Applicant respectfully disagrees with the suggestion that the level of detail contained within the application is not sufficient. For example, the Traffic Regulation Measures Plans - Road Closures [APP-009 to APP-011] and the Traffic Regulation Measures Plans - Temporary Measures [APP-012 and APP-013] which, alongside their accompanying DCO schedules, identify the proposed temporary speed limit reductions, proposed temporary traffic signals and temporary road closures which all form part of the mitigation to provide safe entry and egress to the construction site accesses. The information provided in the Annex of the Framework Construction Traffic Management Plan and Travel Plan [APP-118] is supplementary information that was used in the initial site access review and outlines the visibility splay requirements based on 60mph (100kph) speed limit and uses Google Earth aerial imagery to provide clarity in rural locations with few discernible landmarks. The mitigation proposed has been undertaken on a mixture of available topographical survey mapping and OS mapping. The proposed temporary speed limit reductions and temporary traffic signals are proposed to limit the amount of vegetation removal/trimming required to create the site accesses and also to provided safe entry and egress to the construction site accesses without large amounts of vegetation trimming/removal as

				the construction site access are only required for a short period of time. In addition, within the Framework Construction Traffic Management Plan [APP-118] indicative site access layout design is provided along with swept path analysis which is considered appropriate given the stage of the application.
CCC-57	Transport and access/ design	Highway design	A number of articles (for example Article 9(1)) do not give the local highway authority (LHA) any role in agreeing the design or standard of construction of proposed alterations to the highway. It also makes no reference to any amendments that may be required to the Public Right of Way (PROW) network.	The Applicant respectfully disagrees and considers that each of these matters are appropriately addressed in the draft DCO [APP-019]. Article 9 sets out the proposed power to make alterations to streets. It contains specific powers in paragraph (1) in relation to the permanent alterations to streets contained in Part 1 of Schedule 5 and the temporary alterations in Part 2 of that Schedule. It also contains a general power that is exercisable only with the consent of the street authority, which, in the case of any street maintained by Cambridgeshire County Council ("CCC"), will be CCC. In terms of the specific power in article 9, the CCC should note that article 10 (construction and maintenance of altered streets) provides a role for the local highway authority. In relation to the permanent alterations of streets contained in Part 1 of Schedule 5, paragraph (1) of article 10 makes it clear that these "<i>must be completed to the reasonable satisfaction of the highway authority</i>", providing a clear incentive for the Applicant to seek CCC's agreement to the designs to be employed. In relation to the temporary alterations contained in Part 2 of Schedule 5, again, paragraph (2) of article 10 ensures that these must be completed to the reasonable satisfaction of the street authority (being CCC in the case

				of an adopted road in its administrative area) and are to be maintained by the Applicant for the duration of the temporary alterations and for 12 months after their restoration (see para (3)). These provisions of articles 9 and 10 are not unusual in development consent orders for energy infrastructure. The DCO does not contain any provisions to amend public rights of way, because no permanent alteration of the public right of way network is proposed. Temporary closures of public rights of way are required and these are addressed in article 11 (temporary stopping up of public rights of way). The Applicant welcomes CCCs suggestion of a side agreement to set out in more detail how the provisions in the draft DCO [APP-019] will operate in practice and has shared Heads of Terms to such an agreement with CCC and SCC.
CCC-58	Transport and access/design	Approval methodology	There is no methodology for how Sunnica will seek approval from the LHA.	See CCC-57
CCC-59	EIA process/ planning/ other	Protect public interests	CCC does not agree with the current draft DCO and requires the insertion of clauses into the draft DCO to ensure it is able to better protect the interests of the public, to clarify areas of responsibility in relation to the proposed scheme, and to enable it to interact with the undertaker more efficiently during implementation of the proposed works.	See CCC-57.
CCC-60	Transport and access/ Design	Site specific detail	The application is largely comprised of generic information and little site-specific detail. It is therefore difficult for the LHA to understand the likely impacts and make an	The Applicant respectfully disagrees. Information provided in the transportation documents relates to the local highway network in the vicinity of the Scheme including the local roads, A11 and A14. Details of the HGV trip generation for each of the Sunnica East Site A

			informed decision in relation to the proposed scheme.	and B and Sunnica West Site A and B construction site accesses are provided for the peak and average daily vehicles. The peak and average daily construction staff vehicles are provided with details regarding the trip generation, trip distribution and trip assignment onto the local highway network. A review of each of the specific site accesses was undertaken which identified the visibility splays based on the national speed limit of the roads, swept path analysis of a 16.5m articulated lorry and a 22.6m long crane where necessary, identifies the proposed access strategy for the construction site accesses which includes temporary speed limit reductions and traffic signals to provide safe entry and egress.
CCC-61	Transport and access/ Design	Highways issues	Detail of design is insufficient as is the supporting information. Many roads are narrow, have limited visibility, poor surface quality and subject to national speed limit. Mitigation regarding highway safety, particularly large vehicles routed on constrained highways need to be shown in greater detail.	See responses to CCC-56 and CCC-60.
CCC-62	Transport and access	Number of journeys	The number of journeys between sites throughout the day to each access. This information is needed to be able to assess if safe accesses are deliverable.	The peak and average number of HGV movements on the local roads to the Sunnica West Site A and B and Sunnica East Site A and B site accesses are identified in the Transport Assessment [APP-117] . Other journeys to be made between sites throughout the day will mostly be made using the internal road network, rather than the local highway network. In addition, there is forecast to be a maximum of 59 mini-bus trips on the local highway network between the development and network peak hours, which is set out within the Transport Assessment [APP-117] .
CCC-63	Transport and access	Highway works	Works within the highway (including PRoW) must be undertaken to the satisfaction of the LHA and to the relevant specification and	See CCC-57.

			standards. The applicant must clarify how this will be secured.	
CCC-64	Transport and access	HGV mitigation impact	Mitigation of the impact of HGVs use on the highway network need to be addressed through a Construction Traffic Management Plan and agreed with the LHA.	The Framework Construction Traffic Management Plan and Travel Plan [APP-118] was submitted as part of the application with the final Construction Traffic Management Plan and Travel Plan to be finalised by the contractor and approved by the LHA (see requirement 16 of the draft DCO [APP-019]).
CCC-65	Transport and access	Crossroad proposals	Crossroads are proposed onto the B1085. This would not normally be accepted on a rural high speed road but may be considered in context of the proposed use and under traffic management during the construction phase, however further information relating to the cross-traffic movement will be required.	A temporary speed limit reduction along B1085 and temporary traffic signals during the duration the two site accesses are proposed during the construction of the cable corridor. These measures are shown on the Traffic Regulation Measures Plans [APP-009 to APP-013] and would be given effect through the DCO, if granted. Crossroads are proposed due to the cable crossing under the B1085 and the requirement for HGVs to access both sides of the carriageway from the B1085.
CCC-66	Transport and access	Incomplete data	Routing and the split across each access has not been provided and therefore consider the data incomplete.	The HGV routing to Sunnica West Site A and B and Sunnica East Site A and B site accesses are outlined in the Transport Assessment [APP-117] . The Transport Assessment [APP-117] also identifies the peak and average number of HGVs on the local roads to/from each of the site accesses for Sunnica West Site A and B and Sunnica East Site A and B site accesses. However, it should be noted that given the number of cable route site accesses and the distance the cable corridor covers it is not possible at this stage of the Applicant/scheme to identify the number of HGVs required for each of the individual site accesses.
CCC-67	Transport and access	Routes	CCC requires anticipated flows for routes on minor roads linking to each individual cable route/minor access.	See response to CCC-66.
CCC-68	Transport and access	Vehicle occupancy	The vehicle occupancy assumption based on the 2020 transport assessment of Sizewell C DCO in Suffolk is not evidenced as being	The average vehicle occupancy was identified from the Hinkley Point C monitoring reports as a major construction project where monitoring data exists, and as the occupancy rate was accepted by SCC for the

			applicable to this scheme that is very different in nature.	Sizewell C DCO. The average vehicle occupancy represents a car driver mode share of 67% with the remaining 33% to be made up of car passengers, sustainable transport modes and the mini-bus service. The average vehicle occupancy is used to identify the forecast number of construction car vehicles on the highway network. The car driver mode share of 67% is considered appropriate for the assessment of the Scheme. The remaining mode share is to be made up of sustainable modes and the mini-bus service. The car driver mode share is not reliant on achieving a mode share for walking, cycling, public transport (bus & rail) or the mini-bus service. The mode share applied is considered appropriate for the assessment of the scheme. The final Construction Traffic Management Plan and Travel Plan will further identify measures to reduce the number of construction staff vehicles such as encouraging car sharing and providing a mini-bus service to pick-up/drop-off local construction staff. The average car occupancy factor has been discussed with the LHAs (26th April 2022), and the Applicant agreed to provide further evidence of the validity of the assumption and potentially a sensitivity test into the effect of varying the factor on traffic impact. A review of a range of DCO applications, including solar and wind, suggests that 1.5 car occupancy is a robust assessment parameter, with the majority of applications using an equal or lower car driver mode share. Furthermore, a sensitivity test of a 1.3 car occupancy, which equates to a higher car driver mode share than other DCO applications, would not affect the traffic impact conclusions presented in the ES. This has been presented to the LHAs (13th July 2022) and will be provided to the LHAs for review.
CCC-69	Transport and access	Junction layout	The layout of junction 38 has a significant impact on traffic movements associated with	The Applicant respectfully disagrees that it is not reflected in the Transport Assessment [APP-117] . The

			this development which is not reflected in the TA (3.4.3).	layout of Junction 38 and the restricted movements are reflected in the assignment of vehicles onto the highway network as outlined in section 5.4 of the Transport Assessment [APP-117] .
CCC-70	Landscape and visual amenity	Rights of Way	The visual impact mitigation measures do not consider temporary mitigation whilst planting grows to a suitable height.	The Landscape and Ecology Management Plan [APP-108] describes the measures embedded into the design to mitigate landscape and visual effects. This includes setbacks from public rights of way and the maintenance which will be undertaken to successfully establish vegetation proposed for visual screening, which is shown on the Landscape Masterplans for the Scheme [APP-209 to APP-214]. The LVIA presented in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] acknowledges that there will be some significant visual effects in winter of year 1 of operation, which is a worst-case assessment. Temporary mitigation while planting establishes, such as hoarding, is not considered appropriate as this would be likely to introduce other effects on the landscape and views. It is possible to provide some estimates on how tall proposed planting could be by year 5 of operation, based on the assumptions set out in paragraph 10.3.11 of Chapter 10 of the Environmental Statement [APP-042]. Assuming that the growth rate of 20cm per year stated in 10.3.11 (d) was applied to hedgerows and woodland planted with forestry transplants of 40 to 80cm, by year 5 of operation, these may on average have grown to approximately 1.4m to 1.8m. At this height, proposed vegetation would begin to provide an effective visual screen, based on average eye height of 1.5 to 1.7m above ground level (GLVIA3, paragraph 6.11). This does not take consideration of the proximity of the receptor or the elevation of the viewing place relative to the Scheme, which may affect the extent of views.

				To illustrate these assumptions, year 5 photomontages have been prepared for the following viewpoints and issued to the LPAs: • Viewpoint 5: View south-east from Beck Road (Sunnica East Site A) • Viewpoint 15A: View south from U6006 (Sunnica East Site B) • Viewpoint 32: View south-west from La Hogue Road (Sunnica West Site A) • Viewpoint 46: View north from Fordham Road (Sunnica West Site B).
CCC-71	Transport and access	Rights of Way	There are a number of inaccuracies and missing information associated with the Access and Rights of Way (A&ROW) Plans and Permissive Paths Schedules 1 and 2. These will be amended to CCC's satisfaction.	The Applicant has taken care to ensure the Schedules to the draft DCO [APP-019] are accurate and will carefully consider any suggested corrections when received. The permissive routes are not included in the Schedules to the draft DCO that relate to streets. This is because there is no need for the DCO to grant a legal power to create a permissive route. Permissive paths are included in Schedule 1 to the DCO and the Applicant is required to deliver the permissive routes through the provisions of requirement 21, which is contained in Schedule 2 to the draft DCO.
CCC-72	Transport and access	Roads and footways	The Council requires that a Highway Standards specification be agreed with the Applicant that is included in a legal side agreement. The County Council requests liaison with Sunnica regarding this aspect of the development as soon as possible.	See CCC-57.
CCC-73	Air Quality	Emissions	We do not consider as stated in paragraph 14.2.16 "Exhaust emissions from road vehicles may affect the concentrations of the principal pollutants of concern (NO₂, PM₁₀ and PM_{2.5})".	It is widely acknowledged that the principal pollutants from road vehicles are particulate matter and nitrogen dioxide (Air Pollution in the UK 2020, Defra, 2021, section 2.4). This is evidenced by the fact that the vast majority of Air Quality Management Areas in the UK are declared for particulate matter, nitrogen dioxide, or both. No significant residual air quality effects are predicted for the Scheme.

CCC-74	Air Quality	HGVs	Clarity is needed to understand the assumptions for the performance of HGVs behind the modelling exercise referred to in paragraph 14.6.1 and table 14.6.	The HGV emissions used in the modelling exercise are the default assumptions built into the Defra Emission Factor Toolkit, as stated in Chapter 14: Air Quality of the Environmental Statement [APP-046] . This means that the national average HGV emissions for the types of roads modelled and the years selected have been used. No adjustment to the Defra values has been made.
CCC-75	Air Quality / Transport and Access	Construction Logistic Plan	More detail is required for how the Construction Logistic Plan (CLP) is delivered, and the measures to ensure all contractors and subcontractors and suppliers co-operate.	A Framework Construction Environmental Management Plan [APP-123] has been produced and submitted as part of the DCO application. This details mitigation measures that would be adopted during construction to minimise disruption and environmental impacts during construction. A full Construction Environmental Management Plan will be produced during detailed design and prior to construction (as required by a requirement to the DCO). Mitigation for air quality impacts are set out in Table 3-9 of the Framework Construction Environmental Management Plan [APP-123] and these include the production of a Construction Logistics Plan to manage the sustainable delivery of goods and materials.
CCC-76	Transport and Access	Cycle routes	Further clarification is needed with regard to the impact on local primary schools and potential safe routes to school for walkers and cyclists.	The HGV routes are identified in the Transport Assessment [APP-117] with the construction staff vehicle distribution and assignment also identified in the Transport Assessment [APP-117] . The HGV routes are focused on the A11 and A14 with information provided in the Transport Assessment [APP-117] regarding the peak and average daily number of HGVs on the local roads. The construction staff vehicles are forecast to be on the highway network before 0700 and after 1900 therefore outside of the typical travel times to local schools. The hourly number of HGVs identified within the Environmental Statement and Transport Assessment [APP-117] are based on the construction worker shift of 12-hours and assumed there will be a 10-hour construction delivery window as it excludes the two network peak hours with movements split equally across

				the hours. Therefore, it is forecast there will be minimal HGVs on the local highway network during the typical travel time to and from local schools.
CCC-77	Human Health	Severance of PROW	The duration of time for severance of PROW needs to be provided to inform the impact for users.	As stated in Chapter 13: Transport and Access of the Environmental Statement [APP-045] , in total eight PROWs are forecast to be closed and are expected to be for a maximum of three weeks, which is considered to be a worst-case scenario, with further information provided in the Framework Construction Traffic Management Plan and Travel Plan [APP-118] and the Traffic Regulation Plans – Temporary Measures [APP-012] and [APP-013] .
CCC-78	Transport and access	Access locations	The proposed locations of construction and operational accesses are ambiguous, with all access appearing to be retained for potential future use during the operational period.	The Applicant respectfully disagrees. The Design and Access Statement [APP-264] identifies the locations of the site accesses and outlines which site accesses are required during the construction, operation and decommissioning stages. In addition, the site accesses and their duration of usage is identified in the Transport Assessment [APP-117] which states which are to be used during the construction, operation and decommissioning stages. Where the site accesses are not required during the operational period it is stated that the site access is either only required during the construction or decommissioning stage or both the construction and decommissioning stages. Where accesses are not required during operation, the land on which they are situated would be re-instated.
CCC-79	Transport and access	Access locations	Indicative access locations have been provided in Annex C to Appendix 13c. These designs appear to be based on high-level mapping and/or aerial imagery. The detail of the design is insufficient as is the supporting information.	The Applicant respectfully disagrees. The layout and the swept path analysis (vehicle tracking) has been based on topographical mapping or OS mapping and not aerial imagery. The aerial imagery was provided to show details on the surrounding landscape. For the purposes of the application, it is not considered necessary to identify detailed design of the site accesses, such detail

				will be submitted for the approval of the relevant planning authority in accordance with Requirement 6 if development consent is granted and in accordance with the provisions of the draft DCO [APP-019] discussed in response CCC-57. The indicative site access layouts provide an indication of the size of the site access junctions required to accommodate a 16.5m articulated lorry or in some locations a 22.6m long crane and demonstrate that access for such vehicles can be safely accommodated in principle.
CCC-80	Transport and access	Detail regarding access	As indicated in supporting documents, some of these accesses will serve hundreds of daily vehicles. Given the anticipated levels of use, the detail provided is not sufficient.	There are two site accesses from which the two construction staff car parks will be accessed. The peak and average number of HGVs per local road and site accesses are identified in the Transport Assessment [APP-117] for the Sunnica East Site A and B and Sunnica West Site A and B site accesses. Details on these accesses are provided in the Framework Construction Traffic Management Plan and Travel Plan [APP-118] . The level of detail provided includes indication of traffic levels, whether the access is for construction only, access geometry, visibility, swept path analysis (vehicle tracking), and temporary traffic management proposals. These are of a suitable level of detail for the DCO submission stage of the project to demonstrate suitability of the Scheme, with further detail to be worked up prior to implementation in accordance with the requirements of the DCO, if development consent is granted.
CCC-81	Transport and access	Trunk road slip roads	Trunk road slip roads are classified as being 'very low' sensitivity. Being an integral part of the network to be used connecting to the trunk roads these are of strategic importance and the assessment should reflect as much.	The Applicant respectfully disagrees. The classification of the link sensitivity for the purposes of the assessment is set out in Chapter 13: Transport and Access of the Environmental Statement [APP-045] . The A11 and A14 off-slips have been categorised as low sensitivity as these off-slips connect to local roads. Although the on-slips connect to the SRN they have been classified as very low sensitivity as they are free flowing and the

				merges onto the A11 and A14 operate well within theoretical capacity.
CCC-82	Transport and access/Landscape and visual	Visibility	Based on the specifics of the access proposals and location, other visibility splays may be required to ensure highway safety will not be compromised e.g., forward visibility, tangential visibility, pedestrian visibility splays.	The proposed temporary traffic signals and temporary speed limit reductions identified are to provide safe entry and egress to the construction site accesses. The initial site access review identified the visibility splay requirements based on the highway speed limit (e.g. 60mph/100kph = 215m visibility splay), which identified large amounts of vegetation to be trimmed or removed. Therefore, the proposed access strategy included in the application is to provide temporary traffic signals and speed limit reductions to limit the amount of vegetation trimming/removal while still providing safe entry and egress of the construction site accesses. Notwithstanding the point that a significant level of information is provided, the Applicant notes CCCs representation and has discussed whether signposting to the information or a consolidated presentation of access design information can be provided and will seek to address this as discussed with the local highway authorities.
CCC-83	Transport and access/Landscape and visual	Visibility	It does not appear that all visibility splays shown fall within land under the Applicant's control or public highway.	The visibility splays that are required, taking into account the proposed TRMs, would be on highway land or on land over which the Applicant seeks the necessary powers to deliver them.
CCC-84	Transport and access/Landscape and visual	Visibility	The plans detailing visibility splays currently provided are too small a scale to assess the achievable visibility or to assess the impact on adjacent land or features.	See response to CCC-80 and CCC-82.
CCC-85	Transport and access/Landscape and visual	Visibility	The access junctions designs and locations cannot be accepted until the applicant has demonstrated that the above visibility requirements can be met.	See response to CCC-80.

CCC-86	Transport and access/Landscape and visual	Visibility	Sites where appropriate visibility cannot be fully achieved within the public highway or land within the Applicant's control would not be considered suitable for any intensification of use or potentially retention during the operational period.	See response to CCC-80.
CCC-87	Transport and access	Vehicle tracking	Vehicle tracking is considered insufficient to demonstrate the suitability of accesses designs or any necessary mitigation on the public highway network.	See response to CCC-83. Swept path analysis (vehicle tracking) provided on topographical mapping or OS mapping, depending on which was available, provides an adequate indication of the size of the junction required to accommodate a 16.5m articulated lorry or where required up to a 22.6m long crane. This level of detail is considered appropriate at this stage of the application given it is not detailed design, and that the detailed design would be subject to local planning authority approval pursuant to Requirement 6, if development consent is granted.
CCC-88	Transport and access	Rural accesses	Many of the rural accesses proposed utilise existing narrow field access crossing ditches and it is often unclear from the information provided whether the swept path and proposed access arrangements can be accommodated without amendment to the existing ditch, which would require the consent of the LLFA or relevant Water Authority.	Any consents related to ditches would be procured pursuant to the protective provisions in Part 8 of Schedule 12 of the DCO [APP-019] . The swept path analysis and the indicative site access layouts provide sufficient information of the junctions required to accommodate a 16.5m articulated lorry or a 22.6m long crane where relevant.
CCC-89	Transport and access	Tracking	We are unable to determine the exact tracking movements which are necessary in absence of detailed traffic flow diagrams.	The proposed temporary traffic signals and temporary speed limit reductions identified are to provide safe entry and egress to the construction site accesses. The initial site access review identified the visibility splay requirements based on the highway speed limit (e.g. 60mph/100kph = 215m visibility splay), which identified large amounts of vegetation to be trimmed or removed.

				Therefore, the proposed access strategy is to provide temporary traffic signals and speed limit reductions to limit the amount of vegetation trimming/removal while still providing safe entry and egress of the construction site accesses. Indicative site access layouts are provided to indicate the site of the junctions required to provide access to a 16.5m articulated lorry or a 22.6m crane where required, and are provided in the Framework Construction Traffic Management Plan and Travel Plan [APP-118] . The detailed design of the site accesses would be subject to local planning authority in accordance with requirement 6, should development consent be granted.
CCC-90	Transport and access	Assessment shortfalls	Fundamental issues around the assessment of the development's impact based on 12-hour day shift patterns.	The construction staff working hours are mandated pursuant to the Framework Construction Environmental Management Plan [APP-118] ; with any work outside those hours to be approved pursuant to a section 61 consent. Compliance with the measures outlined in the Framework Construction Environmental Management Plan [APP-118] would be secured by requirement 14.
CCC-91	Transport and access	Assessment shortfalls	The assessment of driver delay quantifies impacts in terms of changes to traffic flow but does not in terms of delay (e.g. increasing in journey time).	The Transport Assessment [APP-117] and Chapter 13: Transport and Access of the Environmental Statement [APP-045] provides and justifies the methodology for assessment of the impact on driver delay through the absolute and percentage change in traffic flows, as well as comparison with peak period data to provide useful context and a reference point with regards to the capacity performance of the network. This is entirely appropriate and standard practice for an Environmental Statement, particularly considering the changes in traffic flows occur for a short-term, temporary time period during construction, outside of traffic network peaks. Further explanation on this approach has been provided to the LHAs (26th April 2022). The forecast increase in vehicles and the comparison of the development peak hour traffic flows to the network

				peak hour traffic flows provide a reasonable indication on the expected level of delay. The increase of vehicles and associated delay are forecast during a short-term, temporary period during the construction of the Scheme and relates to the peak forecast months which are to occur for a short-term temporary period within the construction phase.
CCC-92	Transport and access	Assessment shortfalls	There are a number of assumptions made without evidence to support them.	It is unclear which assumption(s) this is in reference to. The assumptions and justifications for them are set out in the Transport Assessment [APP-117] and in Section 13.3 of Chapter 13: Transport and Access of the Environmental Statement [APP-045] .
CCC-93	Transport and access	Assessment shortfalls	Concerns remain regarding the accuracy of the ratio used to determine baseline flows in the development peak hours. The data used to calculate these reductions should be submitted for review particularly as Table 3-13 indicates a range of differences between these hours, particularly for the AM.	In order to assess the development peak hours of 06:00-07:00 and 19:00-20:00, factors have been identified to convert the 08:00-09:00 and 17:00-18:00 traffic survey data obtained from the three planning applications and 'Forest Heath District Council Site Allocation Plan Cumulative Impact Study' Assessment. The traffic survey data did not cover the 06:00-07:00 and 19:00-20:00 periods as they are outside the traditional peak periods (07:00-10:00 and 16:00-19:00) undertaken in Manual Turning Count traffic surveys. The conversion from the AM and PM network peak hours to the construction AM and PM peak hours used an Automatic Traffic Count survey (ATC) which was carried out over 24-hours for 7-consecutive days in March 2017 on Warren Road, Red Lodge.
CCC-94	Transport and access	Assessment shortfalls	Dismissing traffic impact of construction traffic on Saturday is not accepted without evidence.	The level of construction workers and HGVs required on-site during the Saturday working hours are typically significantly lower than those identified for a weekday due to more limited construction activities on these days. The amount is currently not quantified; however, the Applicant will investigate whether the LHA can be provided with further information in this regard.

CCC-95	Transport and access	Assessment shortfalls	Removing the minibus movements (59 single direction trips i.e. 118 movements) should not be dismissed from the modelling.	The Applicant respectfully disagrees. The mini-bus trips in the AM are forecast to occur after the construction staff have arrived on site and before the network peak hour and in the PM the mini-bus trips are to occur outside of the network PM peak hour after 1900. The additional 59 (single direction trips) / 118 two-way trips are not expected to have a material impact on the highway network outside of the network peak hours with staff being transported from Elms Road and La Hogue Road to a number of site accesses on Newmarket Road, Ferry Lane, Beck Road, Newmarket Road adjacent to Golf Links Road, Dane Hill Road, Fordham Road and Chippenham Road.
CCC-96	Transport and access	Assessment shortfalls	Impacts are often dismissed based on their comparison to the peak hour (such as paragraph 13.8.227), this is not considered a valid reason for dismissing impacts given the assessment is to test the development's impact, not whether the network operates better during certain other periods.	Please see CCC-91 regarding the comparison with the peak hour.
CCC-97	Transport and access	Assessment shortfalls	Clarity is needed regarding maximum levels anticipated associated with maintenance described in the Chapter 13 Transport and Access, paragraph 13.8.254.	It is anticipated that there will be up to 17 permanent staff on-site during the operational phase during a single shift, with staff working on a three-shift pattern. There will also be a requirement for additional staff to attend the sites when required for maintenance and cleaning activities. If all the 17 permanent staff drove daily to the Scheme this would result in an additional 17 vehicles on the highway network. It is noted that there is the potential for vehicle sharing for operational staff which would reduce the number of vehicles on the highway network during the operational phase. It is not anticipated that the 17 permanent staff on-site during the operational phase will have a significant impact on the local highway network with occasional vehicle trips required for maintenance.

CCC-98	Transport and access	Mitigation	It is unclear what mitigation is needed on the surrounding highway network.	The mitigation is outlined in the Framework Construction Traffic Management Plan and Travel Plan [APP-118] as well as the Traffic Regulation Measures Plans – Temporary Road Closures [APP-009 to APP-011] and Traffic Regulation Measures Plans – Temporary Measures [APP-012 and APP-013] .
CCC-99	Transport and access	Mitigation	CCC seeks more supporting documentation to give weight to the mitigations proposed.	The mitigation is outlined in the Framework Construction Traffic Management Plan and Travel Plan [APP-118] as well as the Traffic Regulation Measures Plans – Temporary Road Closures [APP-009 to APP-011] and Traffic Regulation Measures Plans – Temporary Measures [APP-012 and APP-013] .
CCC-100	Transport and access	Mitigation	To advise if mitigation is needed, we would need detailed contractor/construction traffic routing (incl. details of heavy vehicles), vehicle flows and appropriate vehicle tracking in relation to each access.	The HGV routing is identified in the Transport Assessment [APP-117] and Framework Construction Traffic Management Plan and Travel Plan [APP-118] with the peak and average HGVs on the local highway network for each of the Sunnica East Site A and B and Sunnica West Site A and B site accesses identified in the Transport Assessment [APP-117] . The construction staff vehicle distribution and assignment is also identified in the Transport Assessment [APP-117] .
CCC-101	Transport and access	Mitigation	Such mitigation that is indicated is shown on high scale mapping/aerial imagery making its suitability impossible to determine.	The Applicant respectfully disagrees. The proposed Traffic Regulation Measures Plans – Temporary Measures [APP-012 and APP-013] including temporary speed limit reductions and temporary traffic signals are provided on figures which are legible to understand the proposed mitigation strategy and described in detail in Schedule article 44 of, and Schedule 14 to, the draft DCO [APP-019] . The supporting information is provided on suitable mapping, with aerial imagery added to enhance legibility of the strategy including swept path analysis and indicative junction layouts.
CCC-102	Transport and access	Mitigation	It is suggested that such a study be extended to all roads effected by these proposals so that this can be considered alongside traffic volume and speed in determining suitable	The mitigation is outlined in the Framework Construction Traffic Management Plan and Travel Plan [APP-118] as well as the Traffic Regulation Measures Plans – Temporary Road Closures [APP-009 to APP-011] and

			mitigation measures such as road widening or provision/ improvements to passing places.	Traffic Regulation Measures Plans – Temporary Measures [APP-012 and APP-013] .
CCC-103	Transport and access	Highway works	Works within highway must be undertaken to the satisfaction of the LHA and to the relevant specification and standards. The applicant must clarify how this will be secured.	See CCC-57.
CCC-104	Transport and access	LHA fees	The reasonable fees of the LHA in approving and inspecting works must be met by the applicant and further clarification and undertaking by the Applicant will be required in this respect.	See CCC-57.
CCC-105	Transport and access/ construction	Removal	Temporary works in the highway must also be undertaken to the same standard and specification. The Applicant must clarify which works are to be removed post construction and the nature of its reinstatement.	See CCC-57.
CCC-106	Transport and access/ construction	Cabling	Wherever possible the 132kV cables should be laid in private land, not in the public highway. Where cables have to be laid in the public highway, i.e., where it laterally crosses the highway, the cables should be adequately protected, marker posts used to indicate the presence of the underground cables and recorded on a publicly available national underground asset register. On decommissioning, any apparatus laid in the public highway should be removed and not left in-situ.	This comment is noted. The cable corridor has been developed to avoid the need to lay cable in the public highway. Where cables cross the highway these are done laterally and all appropriate protections will be in place. It is the case that the Applicant proposes for the electrical connection cable to be left in-situ following decommissioning.
CCC-107	Construction	Traffic Management Plans	A Framework Construction Traffic Management Plan (Framework CTMP) and Travel Plan (EN010106/APP/6.2) has been provided to support this application. Both will need to be agreed with the LHA.	This comment is noted – the detailed versions of those plans will be approved by the LHA in accordance with the provisions of requirement 16, should development consent be granted.

CCC-108	Construction	Vehicle movements	Tables 2-1 and 2-2 of this document outlines daily HGV, cranes, and abnormal vehicle single direction movements. The subsequent text (paragraph 2.4.5) detail that during peak construction 1,393 additional staff trips per day (or 937 vehicles) are forecast on the network. Routing and the split across each access which correlates to the above has not been provided. We therefore consider this data to be incomplete.	The parking strategy identified includes two main car parks with one located at Sunnica East Site B, Access C and the second located at Sunnica West Site A, Access A. The staff are travelling to two site accesses with the distribution and assignment of staff vehicles identified in the Transport Assessment [APP-117] . The Transport Assessment [APP-117] identifies the forecast peak and average number of HGVs on the local highway links travelling to/from the Sunnica East Site A and B and Sunnica West Site A and B site accesses. The distribution and assignment of staff vehicles is set out in Chapter 5 of the Transport Assessment [APP-117] . The Applicant considers the assessment is not incomplete.
CCC-109	Construction	Staff trips	Clarification is needed as to peak used in the assessment	The forecast number of staff and staff vehicles is set out in the Transport Assessment [APP-117] , with the peaks identified for Sunnica West Site A and B as month 12, Sunnica East Site A and B as month 6 and the scheme total as month 9.
CCC-110	Transport and access	Vehicle occupancy	Due to varied location, the same occupancy does not necessarily apply in this instance. Further information is needed on the workforce for this project to determine the most appropriate vehicle occupancy.	The average vehicle occupancy was identified from the Hinkley Point C monitoring reports as a major construction project for which monitoring data exists and had been accepted by Suffolk CC for the Sizewell C DCO. The average vehicle occupancy represents a car driver mode share of 67% with the remaining 33% to be made up of car passengers, sustainable transport modes and the mini-bus service. The average vehicle occupancy is used to identify the forecast number of construction car vehicles on the highway network. The car driver mode share of 67% is considered appropriate for the assessment of the scheme. The remaining mode share is to be made up of sustainable modes and the mini-bus service. The car driver mode share is not reliant on achieving a mode share for walking, cycling, public transport (bus & rail) or the mini-bus service. The mode share applied is considered appropriate for the assessment of the scheme. The Construction Traffic Management Plan and Travel Plan will further identify

				measures to reduce the number of construction staff vehicles such as encouraging car sharing and providing a mini-bus service to pick-up/drop-off local construction staff. The average car occupancy factor has been discussed with the LHAs (26th April 2022), and the Applicant agreed to provide further evidence of the of the assumption and potentially a sensitivity test into the effect of varying the factor on traffic impact. A review of a range of DCO applications, including solar and wind, suggests that 1.5 car occupancy is a robust assessment parameter, with the majority of applications using an equal or lower car driver mode share. Furthermore, a sensitivity test of a 1.3 car occupancy, which equates to a higher car driver mode share than other DCO applications, would not affect the traffic impact conclusions presented in the Environmental Statement. This has been presented to the LHAs (13th July 2022) and will be provided to the LHAs for review.
CCC-111	Transport and access	Flows	We have been unable to locate any details of anticipated flows, nor indication of routes on minor roads linking to each individual cable route/minor access. This must be clarified.	Given the low number of forecast Grid Connection Route A and B staff vehicles (average 6 vehicles per day and maximum 8 vehicles per day), it is not considered that the addition of the Grid Connection Route A and B staff vehicles will have a significant impact on routes. The peak and average number of HGVs (single direction) on each of the local roads for the Sunnica East Site A and B and Sunnica West Site A and B site accesses are provided in the Transport Assessment [APP-117] (Plate 2 and Plate 3).
CCC-112	Transport and access	Detailed documents	It is strongly advised that a detailed document be provided in relation to each individual site access prior to the determination of the DCO.	The Framework Construction Traffic Management Plan and Travel Plan [APP-118] as well as the Traffic Regulation Measures Plans – Temporary Measures [APP-012 and 013] identify the access strategy for each site access. Information provided includes swept path analysis (vehicle tracking) of a 16.5m articulated lorry and 22.5m long crane where relevant, indicative junction

				layout, temporary traffic signals and temporary speed limit reductions. In addition, visibility splays were identified as part of the initial site access review which identified generally that a large amount of vegetation was required to be removed to accommodate the visibility splays based on the speed limit of the highway (e.g. 60mph/100kph = 215m visibility splay). The exact location of traffic signal, cones and warning signage, is to be identified by the contractor and in line with the Safety at Street Works and Road Works: A code of Practice (2013, DfT). Discussions are ongoing with the local highway authorities regarding producing a suite of consolidated plans setting out the presentation of the information for each of the site accesses.
CCC-113	Transport and access / Operations	Slurry	It is likely that debris may be dragged on to the public highway the Applicant should provide details of how this will be prevented. If a wheel wash or similar is proposed, the details of how the slurry generated by this will be dealt with must be provided, please note it will not be acceptable to drain such slurry onto to over the public highway.	Wheel washing facilities will be provided at the site accesses to prevent mud being trafficked onto the highway as identified in the Framework Construction Traffic Management Plan and Travel Plan [APP-118]. Hard standing surface will be provided at the site accesses which can accommodate the weight of the HGVs. Where there is existing hard standing surface provided at a site access, the contractor will be responsible for ensuring it can accommodate the weight of the HGVs. The slurry generated by the wheel wash will be treated as waste and disposed of accordingly.
CCC-114	Construction	Traffic and repairs	It is recognised that construction traffic occasionally damages the public highway, and the developer should include a note within the Framework CTMP and TP stating that such damage will be repaired in a timely manner at no expense to the Local Highway Authority.	Paragraph 7.2.14 of the Framework Construction Traffic Management Plan and Travel Plan [APP-118] identifies that the Applicant will undertake highway conditional surveys, before, during and after construction, to identify any impacts which are a result of the development that need to be remediated. The exact roads to be agreed with the local highway authorities in advance of construction.

CCC-115	Transport and Access	Rights of Way	The Applicant should provide more detail to ensure a minimum width of two metres must be left between the legal boundary of a PROW and any new planting, to allow for growth without unlawful obstruction of the highway.	Further detail of the exact locations of proposed planting in relation to features surrounding the Scheme will be identified and provided during detailed design. This can be secured through the Landscape and Ecology Management Plan which will be developed for the Scheme and would be subject to the approval of the relevant planning authority in accordance with the provisions of requirement 8 of the draft DCO [APP-019] , should development consent be granted.
CCC-116	Transport and Access/Landscape and visual	Rights of way	The Council points out that it will take a number of years for hedges to grow to a suitable height to shield the development from path users. Mitigation in the short term is required. Therefore it also requests that temporary fencing with shielding netting is erected alongside all Public Rights of Way and these are maintained by the Applicant until the hedges are of suitable state to shield users from the visual impact of the solar farm.	The Landscape and Ecology Management Plan [APP-108] describes the measures embedded into the design to mitigate landscape and visual effects. This includes setbacks from public rights of way and the maintenance which will be undertaken to successfully establish vegetation proposed for visual screening, which is shown on the Landscape Masterplans for the Scheme [APP-209 to APP-214]. The LVIA presented in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] acknowledges that there will be some significant visual effects in winter of year 1 of operation, which is a worst-case assessment. Temporary mitigation while planting establishes, such as temporary fencing with shielding netting, is not considered appropriate in most cases as this would be likely to introduce other effects on the landscape and views. The Applicant is proposing such mitigation in specific areas: • Solid hoarding proposed as screening for A14 road users travelling in a south-westerly direction (see Chapter 16: Other Environmental Topics of the Environmental Statement, Plate 16-2 [APP-048]). • Temporary fence, rendered in a colour to aids its integration in the landscape will also be implemented in relation to views from Godolphin Gallops (Bridleway 204/5).

CCC-117	Location	Plans	There is insufficient detail provided in the documents to consider the location of the Solar Stations containing inverters, switchgear and other associated equipment.	Figure 3-1 and Figure 3-2 of the Environmental Statement [APP-135] [APP-136] illustrates the indicative locations of solar stations for Sunnica East Sites A and B and Sunnica West Sites A and B respectively. Their location within the wider solar farm is set by the limits of deviation on the Works Plans [AS-004]. The locations of inverters, switchgear and other associated equipment are covered in the parameters of the development, and this affords some flexibility in the final design of the Scheme. Any changes to the layout in the final design will need to be within the parameters that is acceptable in terms of noise.
CCC-118	Noise and vibration	Impact on horses	It should be noted that a horse's range of hearing is wider than a humans and sounds are audible at lower decibels. The assessment needs to consider such impact and implement mitigation where appropriate.	Horses may be startled by short high noise events. Noise from a solar farm is low and continuous and unlikely to cause disturbance in the long-term. Engagement will be undertaken with equestrian groups on scheduling of construction works and the timings of testing. This will be secured in an update to the Framework Construction Environmental Management Plan [APP-123] submitted to Deadline 2 of the Examination.
CCC-119	Transport and Access	Boundary	The A&ROW plans' do not show the County Boundary.	There is no legal requirement to show the county boundary, although the corresponding Schedules to the DCO do identify, in relation to each entry, the relevant administrative area in which it is located. The Applicant does not object to showing the county boundaries on the Access & Rights of Way Plans and will seek to include these in any future issue of those plans during the Examination.
CCC-120	Transport and Access	Plans	The A&ROW plans do not show the pre-existing extent of the highway.	It is not necessary to show the precise existing extent of public rights of way on the Access and Rights of Way Plans [APP-008] because no permanent changes are proposed to the public rights of way network. The Access and Rights of Way Plans are sufficiently clear and precise, when read with the corresponding articles and

				Schedules to the DCO to articulate the powers sought by the Applicant.
CCC-121	Transport and Access	Plans	The A&ROW plans also do not show any proposed diversions for temporarily stopped up PROW.	The Framework Construction Traffic Management Plan and Travel Plan [APP-118] at Section 6.3 outlines how the Scheme has been designed to minimise the duration of temporary closures of PROW, which are each expected to be closed for no more than a three-week period. Given the short duration of the closures it is not proposed to construct temporary diversions and appropriate signage will be used to redirect users to alternative routes on the existing public rights of way network. Compliance with the measures outlined in the Framework Construction Traffic Management Plan and Travel Plan [APP-118] is secured through requirement 16 (construction traffic management plan). In addition, requirement 14 (construction environmental management plan) requires relevant planning authority approval of a Construction Environmental Management Plan substantially in accordance with the Framework Construction Environmental Management Plan [APP-123], following consultation with the relevant highway authority. Table 3-7 of the Framework Construction Environmental Management Plan [APP-123] provides: "Temporary closures of Public Rights of Way will be supported by appropriate and clearly signed existing alternative routes and where possible will be planned and programmed to minimise disruption to users". CCC will therefore be provided with an opportunity to comment on the proposals for PROW closures as they come forward during the construction of the Scheme.
CCC-122	Transport and Access	References	A&ROW plan number 10 shows a site for proposed work within the highway with reference AS-20. This reference appears to be missing from Schedule 5 of the draft DCO,	Thank you for the comment. AS-20 relates to the temporary removal of street signage to facilitate the passage of abnormal indivisible loads. The omitted entry will be added to Schedule 5 in the next iteration of the

			so the highway authority cannot fully consider this proposed work.	draft DCO [APP-019] and it is anticipated that it will read (in column (3)): <i>"Works to enable the passage to the authorised development of abnormal indivisible loads, including the temporary removal of streets signs and street furniture, within the area shown hatched orange on sheet 10 of the access and rights of way plans, reference AS-20".</i>
CCC-123	Transport and Access	Labelling	A&ROW sheet 19 shows a street labelled as Little Fen Drove, in the parish of Burwell. Please note that this name is not recorded for that section of road in the highway authority's Local Street Gazetteer (LSG).	The name Little Fen Drove is taken from publicly available mapping data. If CCC would share the information showing the name is inaccurate and which explains what name ought to be use Sunnica would give careful consideration to amending the drafting.
CCC-124	Transport and Access	Labelling	Site reference AS-40 is incorrectly labelled in Schedule 5 as being within East Cambridgeshire District. In fact, it is within Suffolk and must be corrected in the draft DCO.	Thank you for the comment, this will be corrected in the next iteration of the draft DCO.
CCC-125	Transport and Access	Plans	The permissive paths are not shown on the Access and Rights of Way plans. It is necessary for the proposed permissive paths to be shown on these plans so that their position and connectivity with other PROW is clear. Therefore, the highway authority is unable to consider whether the applicant's proposals are acceptable.	The permissive routes are not shown on the Access and Rights of Way Plans [APP-008] and the corresponding Schedules to the draft DCO [APP-019] because they will not be a highway and no specific highway powers under the DCO are required to give effect to them. Their position is shown clearly on the Figures in the Landscape and Ecology Management Plan [APP-108] . The Applicant would be obliged to the deliver the permissive routes by virtue of requirement 21 (permissive paths).
CCC-126	Ecology	Paths	The Application plans do not include outline landscape and ecological management plan; and they are not shown on the 2.6 Nature Conservation Habitats of Protected Species and Important Habitats Plan. It is necessary for the proposed permissive paths to be shown on these plans so that their impact on biodiversity can be considered.	The Landscape and Ecology Management Plan [APP-108] sets out the proposed Green Infrastructure, including proposed permissive paths and the management, maintenance and monitoring of landscape and biodiversity, the figures of which show the location of the permissive paths.

CCC-127	Construction	Street layout	This article does not give the LHA any role in agreeing the design or standard of construction of any proposed alterations to the layout of streets. It also makes no reference to any amendments that may be required to PROW.	See CCC-57. The application does not propose any permanent alterations to the PROW network.
CCC-128	Transport and Access/ Heritage	Methodology	Article 9(2) and 9(4). Article 9(2) No methodology is proposed for how the undertaker should seek approval from the highway authority for such works. The Council requests that the article is amended to include a requirement for the undertaker to engage with the LHA in terms of the design, inspection and approval of works that emerge in addition to those specified by the DCO, in addition to requiring that the LHA consents to the work.	See CCC-57.
CCC-129	Operations	PROW	Article 9(3) and Article 11(1). Articles do not specify only those PROW within the order limits, or those that are required to be used for the delivery of the scheme, may be temporarily stopped up. This should be made clear.	Article 9(3) says "<i>The undertaker must restore any street that has been temporarily altered under this Order to the reasonable satisfaction of the street authority</i>". The authority to actually alter the streets temporarily is set out in article 9 (power to alter layout, etc., of streets). As discussed in CCC-57 above, this applies to the specific streets identified in Part 2 of Schedule 5 (see article 9(1)(b)) or by virtue of article 9(2), the latter of which is exercisable only with the consent of the street authority concerned. This provides adequate safeguards for the exercise of these powers. The same general approach applies in article 11 (temporary stopping up of public rights of way). Paragraph (3) sets out the specific power to temporarily stop up or authorise the use of motor vehicles on the rights of way specified in Parts 1 and 2 of Schedule 6. Paragraph (4) requires the undertaker to consult the street authority concerned before exercise the specific powers in paragraph (3). Paragraph (4)(b) makes it clear

				that the general power may only be exercised with consent of the street authority concerned. Again, this provides adequate safeguards for the exercise of these powers.
CCC-130	Transport and Access	Highway inspections	There should be clauses affording protection to the highway authority by permitting it the right to carry out inspections and to certify that the altered highways (including PROW) have been constructed to an acceptable standard.	See CCC-57.
CCC-131	Transport and Access	PROW liability	The applicant should also be liable for restoring any such PROW to a condition that is satisfactory to the highway authority, following use by motor vehicles (or if used for temporary works purposes as outlined in article 11(6)).	The Applicant has prepared a Framework Construction Traffic Management Plan and Travel Plan [APP-118] . Paragraph 7.2.13 of that document outlines that the Applicant will agree with the local highway authorities highway condition surveys to identify any impacts which are a result of the development that need to be remediated. Requirement 16 (construction traffic management plan) requires the Applicant to submit a Construction Traffic Management Plan to the relevant county authority prior to the commencement of any phase.
CCC-132	Transport and Access	PROW	The LHA should have the opportunity to comment on any proposed diversionary routes for temporarily closed PROW, to safeguard against unreasonable negative impacts on user convenience and safety.	This opportunity is provided by requirement 14 (construction environmental management plan) which requires relevant planning authority approval of a Construction Environmental Management Plan substantially in accordance with the Framework Construction Environmental Management Plan [APP-123], following consultation with the relevant highway authority. Table 3-7 of the Framework Construction Environmental Management Plan [APP-123] provides: “<i>Temporary closures of Public Rights of Way will be supported by appropriate and clearly signed existing alternative routes and where possible will be planned and programmed to minimise disruption to users</i>”.

CCC-133	Consultation	Timeframe	Article 11(4). There is no timeframe for the consultations specified in this article.	The Applicant is willing to include a minimum period of consultation in respect of the consultation required by article 11(4) and will set out its proposals in relation to this in the next iteration of the draft DCO.
CCC-134	Consultation	Further engagement	Article 13 This article highlights the need for the Applicant to engage with the highway authority to agree procedures related to works they propose to undertake within the highway.	The purpose of article 13 is to facilitate the exercise of the relevant Order powers by enabling street authorities and the undertaker to enter into agreements. As noted in CCC-57 above, the Applicant would welcome further discussions with CCC in relation to a side agreement and has issued Heads of Terms for such an agreement to both relevant local highway authorities.
CCC-135	Consultation	Further engagement	CCC requires the insertion of clauses into the draft DCO to cover the above items, to ensure it is able to better protect the interests of the public, to clarify areas of responsibility in relation to the proposed scheme, and to enable it to interact with the undertaker more efficiently during implementation of the proposed works.	As noted in the responses above, subject to the minor amendments contemplated in those responses, the Applicant considers the provisions of the Order incorporate the matters referred to by CCC. The provisions of the draft DCO [APP-019] that relate to highways are fundamentally sound, effective and subject to appropriate safeguards. Nonetheless, the Applicant would welcome discussions with CCC with a view to agreeing an appropriate side agreement that would set out in more detail how those provisions would operate in practice and has issued Heads of Terms for such an agreement to both relevant local highway authorities.

2.3 RR-0998 East Cambridgeshire District Council

Applicant responses to RR-0998

Applicant's Ref.	Theme	Issue	Summary of issue raised	Applicant's response
ECDC-1	Other	Development consent	On the 21 October 2019 East Cambridgeshire District Council declared a climate emergency. However, the proposal has raised significant concerns from some consultees. The first of these is rather than being perceived as a solar	The Landscape and Visual Impact Assessment (LVIA) set out in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] summarises the effects on the landscape in detail, from the national scale, through regional, county, district and

			development occupying an area of land within a wider landscape, Sunnica has the potential to dominate and transform the local landscape, to alter it beyond recognition, and thus to create a new landscape altogether.	neighbourhood scales to local landscape character areas defined by the Applicant. It is acknowledged in Appendix 10D: Published Landscape Character Extracts of the Environmental Statement [APP-103] that there will be broad-scale change to the character of the landscape at the site level and within parts of the Rolling Estate Chalklands landscape character type (LT) defined within the Suffolk Landscape Character Assessment 2010, which extends partly into Cambridgeshire. Effects on some receptors would be significant at construction and year 1 of operation, reducing in the most part to not significant at year 15 of operation. Residual significant effects are predicted for some landscape receptors at year 15 of operation, particularly relating to intra project effects, as set out in Appendix 10G: Landscape Effects of the Environmental Statement [APP-106]. The Scheme would not dominate and transform the local landscape to the extent that it would alter it beyond recognition. The Scheme is split into sites with substantial areas of predominantly intensively managed agricultural land between sites. It has been designed to retain the existing landscape pattern and features, as far as possible, and effects on landscape character will be localised. Whilst it is acknowledged that some key characteristics, such as openness, will change, the majority of key characteristics will be retained. For example, within the Rolling Estate Chalklands LT, the large uniform fields enclosed by low hawthorn hedges and shelter belt planting will be retained and the clustered villages will not be altered.

ECDC-2	Landscape and visual amenity	Visual impact	The fragmented layout of the proposals, located amidst and around several settlements and within a historic landscape, has the potential to impact on local character to such an extent as to affect the sense of place, and the place attachment of the residents, of the affected villages and communities. Many residents will experience the adverse visual and perceptual effects of various elements of the solar farm, as part of their daily routines. The visual elements include not only the panels themselves, but also the battery storage compounds and general security infrastructure such as fencing and lighting, as well as access roads.	The landscape within the study area is the product of centuries of increasingly intense agricultural expansion and development. It is, by design, a productive landscape. A detailed assessment of landscape character has considered the likely effects of the Scheme on the landscape at different scales. Most of the area is under intensive arable production with some areas of pasture around village edges and is interspersed with other uses such as settlement, large-scale free range pig farming and quarrying. In the southern part of the study area, the horse racing industry has transformed the landscape with extensive, manicured training areas and associated facilities. Important areas for nature and historic conservation are recognised as islands within the agricultural landscape. The Scheme is large and to mitigate this it has been designed as a series of discrete sites separated by substantial areas of mainly intensively managed agricultural land and offsets from settlement edges. As can be seen in Figure 10-14a [APP-209] to Figure 10-14f [APP-214], the landscape on the fringes of these settlements, which is not proposed to include above ground infrastructure related to the Scheme, tends to be more intricate than the surrounding arable land, with smaller fields defined by mature vegetation and well vegetated gardens. This, together with tree, shrub and hedgerow planting proposed as part of the masterplan for the Scheme, will maintain the sense of place and place attachment of residents. Several settlements are located in the study area defined within Chapter 10: Landscape and Visual Effects of the Environmental Statement [APP-042]. Individual community areas within East Cambridgeshire are described in turn below:

				• Isleham – Solar panels would be located approximately 500m from the south eastern corner of the village in parcel E05 of Sunnica East, beyond intervening arable land. A belt of woodland is proposed to enclose and screen the structures. Solar panels in parcels E01 and E03 would be located approximately 1.2km from the eastern edge of the village, beyond Lee Brook, which is not perceptible due to intervening vegetation in the flat landscape. • Fordham – The closest area of solar panels to Fordham would be parcels W01 and W02 of Sunnica West, approximately 1km south of the settlement and located to the east of Snailwell. There is substantial woodland and other mature vegetation in the intervening landscape, such that the Scheme will not affect its setting or character. • Chippenham – This small village lies to the north of Chippenham Park and Gardens. The closest part of the Sunnica East Site B would be parcel E19, approximately 2km to the north east. The closest part of Sunnica West would be approximately 1.6km south, beyond Chippenham Park and Gardens. The sense of place and place attachment of residents will not be affected. • Snailwell – The hamlet of Snailwell would be located approximately 260m west of the closest area of solar panels in parcel W03 of Sunnica West, enclosed by proposed woodland planting and screened by intervening vegetation and rising land. There would also be solar panels in parcel W02 to the north, beyond an existing belt of mature trees. The sense of place and place attachment of residents will not be affected. • Burwell – If the Applicant's Option 2 for extending the substation is to proceed, the proposed cable

				connection at Burwell would be located adjacent to and in the context of the existing substation. The fields on the western side of the village are small and defined by tree lines and dense hedgerows, creating physical separation from the sub-station. In summary, it is acknowledged that the scale of the Scheme is large. The layout, across discrete sites within Sunnica A and Sunnica B, is intentional. The Scheme has been designed to avoid development within or directly on the boundaries of existing settlement and to retain separation between settlements and the wider landscape. As summarised in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042], significant effects on the sense of place and place attachment of residents of settlements are not likely. As shown in the Figures presented within the Landscape and Ecology Management Plan [APP-108], there are sections of roads where solar farm infrastructure would be in closer proximity, for example to the north of Beck Road between Isleham and south of the B1102 Freckenham Road between Worlington and Freckenham. In such cases, mitigation has focussed on limiting development to one side of the road, providing offsets of grassland and additional planting to enclose and screen solar farm infrastructure. The Applicant is engaging further with ECDC to explain how the Scheme proposals have developed over time to account for impacts to these villages.
ECDC-3	Ecology	Trees	The developer has failed to provide sufficient information in regards to the impact upon trees in order for a	More detailed targeted tree surveys in accordance with BS5837 are ongoing which will build on existing information within the application. This is expected to

			professional judgement to be made either at this stage or at the LIR.	verify the conclusions in the Environmental Statement and will be provided during the Examination.
ECDC-4	Heritage	Impact	The proposed development will have a detrimental impact upon the Chippenham Historic Park and Garden.	The impact of the Scheme on the Grade II Registered Historic Park and Garden at Chippenham Park is presented in Chapter 7: Cultural Heritage of the Environmental Statement [APP-039] . This acknowledges that there will be an adverse impact on the significance of the asset through changes within its setting. This is assessed to be at the moderate adverse level which is a significant effect. The Heritage Harm Statement acknowledges that there will be harm caused, but at the less than substantial level (Planning Statement Appendix D [APP-263]). This conclusion is supported by Historic England within their Relevant Representation.
ECDC-5	Construction	Working hours	Hours of work during construction phases are proposed to be between 0700 -1900 Mon-Sat. General construction hours on development sites are restricted in East Cambridgeshire to between 0730 and 1800 Mon-Fri, 0730 and 1300 Sat and at no time on Sundays or Bank Holidays. The Environmental Health Department does not support the proposal to conduct construction works outside of these recommended times.	The Framework CEMP [APP-123] sets out the proposed construction working hours, with this to be confirmed in the CEMP approved by ECDC. Any activities outside these working hours would be via a section 61 consent from ECDC. As such, ECDC will always have the opportunity to approve proposed working hours.
ECDC-6	Ecology	Biodiversity	There is substantial concern on the potential detrimental impact upon biodiversity.	With reference to Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] , important ecological features identified as part of the detailed baseline surveys are reported in Tables 8-4, 8-5, 8-6, 8-7 and 8-8, with an assessment of likely impacts and effects undertaken in section 8.9. Section 8.8 sets out avoidance and mitigation measures for important ecological features. Chapter 8 concludes that no detrimental impacts to biodiversity are anticipated. The Biodiversity Net Gain Assessment [APP-259] , using Defra's Biodiversity Metric 3.0, concludes that the

				Scheme will result in approximately 83% gain of habitat units, approximately 16% gain in hedgerow units and approximately 1% gain of river units.
ECDC-7	Other	DCO process	ECDC do, however, reserve the right to express views individually where considered necessary, and will be seeking to comment on its support or objection to the proposal when invited to do so under the Written Representation stage. At this stage ECDC will have had time to consider all information submitted under the joint LIR.	This comment is noted.
ECDC-8	Heritage	Impacts	The Council's Conservation Officer has raised significant concern over the detrimental impact upon the Grade II Listed Chippenham Park. It is noted that the developer has stated there will be adverse impact upon the historic setting of this Grade II Park and the selection of the site shows that the impact upon heritage has not been duly considered. Screening (landscape) can only mitigate negative impacts, rather than removing impacts or providing enhancement, it ought never to be regarded as a substitute for well-designed developments within the setting of heritage assets.	The Alternative Sites Assessment [APP-054] at Appendix 4A of the Environmental Statement demonstrates that cultural heritage matters were considered as part of the site selection process. The impact of the Scheme on the Grade II Registered Historic Park and Garden at Chippenham Park is presented in Chapter 7: Cultural Heritage of the Environmental Statement [APP-039]. This acknowledges that there will be an adverse impact on the significance of the asset through changes within its setting. This is assessed to be at the moderate adverse level which is a significant effect. The Heritage Harm Statement acknowledges that there will be harm caused, but at the less than substantial level (Planning Statement Appendix D [APP-263]). No development is proposed within the registered boundary with the area chosen for panels lying within the setting of the asset. The fields proposed for development include the wider agricultural landscape associated with the park. It is considered that the understanding of this use will be maintained and that the area is suitable for development.

				Mitigation for views from within the registered area has been put in place through the development offsets and landscaping has been proposed in recognition of the adverse impact caused. This mitigation is a result of a design evolution as set out in Chapter 4: Alternatives and Design Evolution of the Environmental Statement [APP-036]. Enhancement of existing hedgerows will provide additional screening for the Scheme, as appropriate. Planting has been carefully considered to enhance the Avenue, with localised vegetation removal and reinstating tree planting to better reveal the historic character of the feature. As stated in the Environmental Statement, it is not considered that the landscaping will remove or reduce any impact (paragraph 7.7.162 of Chapter 7: Cultural Heritage of the Environmental Statement [APP-039]). Specifically, it is not intended to provide comprehensive screening, but rather it forms part of the overall design for the Scheme whilst also enhancing the Avenue.
ECDC-9	Heritage	Assessment	The Council will be considering Historic England's 2017 guidance 'Historic Environment Good Practice Advice in Planning Note3: The setting of Heritage Assets' when it undertakes the LIR.	This comment is noted. This document was used for the assessment (see paragraph 7.3.10, bullet a of Chapter 7: Cultural Heritage of the Environmental Statement [APP-039] .)
ECDC-10	Heritage	Archaeology	Cambridgeshire County Council Historic Environment Team will be considering archaeological impacts and will input into the LIR. ECDC might wish to provide comment after the LIR has been completed. It is also expected that Historic England will provide comments and that these will be duly considered.	This comment is noted.
ECDC-11	Ecology	Mitigation	There has been an insufficient adherence to the Mitigation Hierarchy, in which	The Scheme has followed the mitigation hierarchy and sought to avoid impacts to priority habitats, where

			proposed developments should seek to avoid impacts on biodiversity as a priority, and only use mitigation and compensation methods when there is no alternative. Given the type of development, it is considered that more could have been done within the scheme layout to adhere to the Mitigation Hierarchy, particularly in relation to stone curlew and arable flora.	possible. For example, all areas of broad-leaved semi-natural woodland, semi-improved calcareous grassland and standing water (ponds and lakes), will be retained, and measures have been put in place to minimise impacts to hedges, acid grasslands and marshy grasslands. With reference to Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040], important ecological features identified as part of the detailed baseline surveys are reported in Tables 8-4, 8-5, 8-6, 8-7 and 8-8. Section 8.8 sets out avoidance and mitigation measures for important ecological features, with an assessment of likely impacts and effects undertaken in section 8.9. Impacts on Stone Curlew are discussed further in the response to ECDC-12. As set out in paragraph 8.10.7 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] construction activities are predicted to result in the non-significant direct loss of arable habitats, supporting notable arable flora in their field margins. The following areas within the Order limits, where notable species were recorded, will be managed for arable plants (refer to the illustrative parameter plans - see Figures 3-1 and 3-2 of this Environmental Statement [APP-135 to APP-136]): Sunnica East Site B: 4 3x20m wide strips in field E30 and 4 3x10m wide strips in field E17/18 Sunnica West Site A: 3 3x10m wide strips in field W09. The creation and management of these plots is set out in paragraph 8.8.10 7 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] and secured through the OLEMP, Landscape and Ecology Management Plan.
ECDC-12	Ecology	Habitats	The scheme will result in adverse impact to functional land of the Breckland SPA and its population of stone curlew (for which it is designated). It is unclear why	The assessment of the impacts of Stone Curlew occurring outside the Breckland SPA is presented in Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040]. Section 5.3 of the

			the scheme has not been designed to avoid destruction of stone curlew habitat. Furthermore, there is concern that the proposed compensatory measures contain too much risk, and that management plans are lacking important detail.	Habitats Regulations Assessment - Report to Inform an Appropriate Assessment [APP-092] describes the fluid distribution of Stone Curlew within the farming landscape of the Order limits and how the species is reliant on the cropping regime in any given year to provide suitable areas of fallow and spring-sown crops to be able to nest. As detailed in Section 1.8 of Appendix 10I, Landscape and Ecology Management Plan of the Environmental Statement [APP-108] and Offsetting Habitat Provision for Stone-Curlew Specification [APP-258], the Scheme has embedded sufficient areas within the Scheme design to offset any potential reduction in arable farmland, that may, in any given year, be used by Stone Curlew and avoid a net reduction in breeding and foraging opportunities for the species. The areas embedded within the Scheme design for offsetting impacts on Stone Curlew utilise the species' current and historical distribution across the Order limits. Therefore, since this replicates the conditions the birds are already utilising, it is considered a suitably robust approach informed by empirical information on the nesting behaviour of the specific Stone Curlew pairs in question in this landscape. Furthermore, the habitat, including nesting plots, has been designed and will be delivered following what has been successful with the other similar habitat and nesting plots around the Breckland area. The provision of this habitat will ensure no net loss of breeding territories within the Order limits and the Scheme will result in no adverse effect on the integrity of the Breckland SPA.
ECDC-13	Ecology	Mitigation	The ES chapter and the Outline Landscape Management Plan (OLEMP) state that 'a maximum of 10 2ha plots will be created'. This gives no certainty as to	As detailed in Appendix 8M: Habitats Regulations Assessment - Report to Inform an Appropriate Assessment of the Environmental Statement [APP-092] and the Offsetting Habitat Provision for Stone-Curlew

			how many will be provided. As surveys recorded five pairs of stone curlew within the scheme footprint, ten plots was described in the Habitats Regulations Assessment as an allocation of two plots per pair. A firm commitment to the ten plots should be made.	Specification [APP-258] the proposals are to create a maximum of ten 2 ha plots, with three in ECO1, three in ECO2, and four across ECO3. This is considered more than adequate to offset any net loss in breeding and foraging opportunities within the Order Limits. As a minimum, five plots will be created to offset the loss of potential nesting sites for the maximum number of pairs identified. Final agreement of the number and location of these plots will be secured pursuant to an update to be made in due course to Requirement 10 in the DCO requiring the application specification to be updated, based on the optimum layout of plots and surrounding grassland foraging areas.
ECDC-14	Ecology	Mitigation	Insufficient details have been supplied about the habitat creation and its long term management, to ensure suitability for stone curlew. It is therefore difficult to have confidence that the adverse impacts identified in the Habitats Regulations Assessment will be adequately mitigated for.	Details of the habitat creation and management is provided in Section 4 of the Offsetting Habitat Provision for Stone-Curlew Specification [APP-258] and Section 1.8 of the Landscape and Ecology Management Plan [APP-108] . The areas embedded for offsetting utilise the species' current and historical distribution across the Order limits and have been designed and will be delivered following what has been successful with the other similar habitat and nesting plots around the Breckland area. Final agreement on the detail of the plots is to be secured pursuant to DCO requirement 10.
ECDC-15	Ecology	Mitigation	Given the uncertainties, and the importance of the stone curlew population, it would be best practice to have some alternative plan of action, in case the habitats are not suitable; this could be in the form of changes to the habitat management, changes to the operational activities on the site or alternative locations for habitat creation for stone curlew.	With reference to the Offsetting Habitat Provision for Stone-Curlew Specification [APP-258] and the Landscape and Ecology Management Plan [APP-108] , approximately 108ha of predominantly arable farmland has been embedded within the Scheme for reversion to grassland, specifically managed to create a close-cropped sward, suitable for Stone-curlew. Small areas of existing acid grassland have also been retained within the Scheme design in Sunnica East Site B and these will form the basis of reverting adjacent areas in Sunnica East Site B to semi-natural grassland, characteristic of the Breckland heaths. This equates to

				greater than the 16 ha per pair and acknowledges the requirement for not only suitable nesting sites, but also the requirement for foraging habitat. Additionally, the provision of a maximum of ten (minimum of five) 2ha plots maximises the potential for take up with two plots allocated per pair. Plots unoccupied for nesting will contribute an important resource for foraging pairs. The Applicant considers that the land embedded within the Scheme for Stone Curlew allows the flexibility for any adaptive management prescriptions to ensure the success of the offsetting areas, the detail of which will be brought forward pursuant to Requirement 10 of the DCO.
ECDC-16	Ecology	Mitigation	There are public rights of way and roads close to areas identified as replacement habitat for stone curlew, which could cause disturbance unfavourable to the condition this species requires for nesting successfully. Furthermore, there is potential for disturbance during the operational phase of the solar farm, created by staff working at the site.	The areas embedded within the Scheme design for offsetting impacts on Stone Curlew are not considered as replacement habitat, but utilise areas within the species' current and historical distribution across the Order limits, which include successful nesting locations in proximity to the existing public rights of way and roads. [APP-086]) and detailed in the Table 3-1 of the Offsetting Habitat Provision for Stone-Curlew Specification [APP-258] and Table 3-3 of the Landscape and Ecology Management Plan [APP-108]. Paragraphs 5.3.21-5.3.23 of the Landscape and Ecology Management Plan [APP-108] consider operational disturbance from site staff during maintenance visits stating the following: <i>'The offsetting habitats have been embedded into the Scheme in areas where operational access will not be required. Irrespective of this all operational staff working within 500m of the offsetting areas will also be given a toolbox talk regarding the sensitivity of Stone Curlew and where possible, maintenance within 500m of the offsetting areas will be scheduled between November and February.'</i>

				This measure is included in the Framework Operational Environmental Management Plan (OEMP) [APP-126]. With these measures in place no operational-related disturbance of nesting Stone Curlew will occur.
ECDC-17	Ecology	Impact	Inadequate consideration for adverse impacts to Chippenham Fen Ramsar site and Fenland SAC has been made in the Habitat Regulations Assessment.	Both direct and indirect impacts to Chippenham Fen designated sites are addressed in Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] and Appendix 8M Habitats Regulations Assessment - Report to Inform an Appropriate Assessment [APP-092], including changes to hydrology and water quality. It is acknowledged that construction activities will occur within 100m of the Fen and therefore, specific mitigation measures have been embedded to prevent indirect impacts, such as for dust generating activities (paragraph 8.8.27 and Table 8-9 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040]) and for construction noise and lighting (Table 8-9 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040]) and will be secured through the Framework CEMP [APP-123]. Table 8-9 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] sets out the potential impacts to these designated sites and explains and justifies why there will be no direct impacts. The same table also considers indirect impacts during construction, including surface water pollution and groundwater contamination, making reference to assessments provided in Chapter 9: Flood Risk, Drainage and Water Resources of the Environmental Statement [APP-041], the Water Framework Assessment [APP-094], construction noise (Appendix 11D – Construction Noise Modelling [APP-112], and Figures 11-2 [APP-234] and 11-3 [APP-235]). These assessments conclude that with the mitigation measures set out in the Framework Construction

				Environmental Management Plan [APP-123], there will be no significant effects on the Chippenham Fen designated sites from construction. There are no pathways (e.g., habitat loss or disturbance to designated site features such as through noise, water quality, air quality, lighting or visual), during operation of the Scheme which could affect these statutory designated sites. There will be no lighting of the perimeter fence at Sunnica West Site B and maintenance visits will be undertaken as outlined in Framework OEMP [APP-126] and secured through the DCO. Table 8-9 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] also considers the impacts of attraction to the solar panels for aquatic invertebrates during operation, identifying the species included on the citations for the designated sites and provides justification as to why there will be no significant effects, based on species ecology, existing vegetation and location and orientation of the panels.
ECDC-18	Ecology	Assessment	The Ecology and Nature Conservation chapter of the Environmental Statement (ES) is lacking important details and relies too heavily on unsubstantiated management plans.	The Framework Construction Environmental Management Plan [APP-123] , Framework Decommissioning Environmental Management Plan [APP-125] , Framework Operation Environmental Management Plan [APP-126] and Outline Landscape and Ecology Management Plan [APP-108] will be developed further through the detailed design stage of the DCO process. The Applicant considers that the application versions of these plans are sufficient for this stage of project development and can be relied upon to avoid or reduce potentially significant effects, as they follow best practice industry standard methods, which have been tried and trusted in similar scenarios.

ECDC-19	Ecology	Assessment	There is an inadequate characterisation of impacts and it is unclear why some ecological features have been excluded from detailed assessment.	Potential impacts on ecological features during construction, operation and decommissioning are presented in section 8.7 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040]. Ecological features taken forward for detailed assessment is based on the criteria set out in paragraphs 8.4.26-8.4.32 and 8.6.17 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040]. The Applicant would welcome more information on the Council's comments on where the characterisation of impacts is considered to be lacking and as to where some ecological features have been excluded from detailed assessment. The framework for ecological assessment, including the determination of important ecological features, has been a subject of the workshops with consultees (as listed in the Consultation Report [APP-026] and associated appendices), as well as presented in EIA Scoping Report [APP-051] and PEIR. The Applicant is unaware of ECDC highlighting additional ecological features requiring assessment.
ECDC-20	Ecology	Assessment	The detailed assessment relies heavily on the Framework CEMP, Framework OEMP and Outline LEMP (OLEMP) for the delivery of mitigation measures and compensation, but these documents are also lacking crucial details.	The Framework Construction Environmental Management Plan [APP-123] , Framework Decommissioning Environmental Management Plan [APP-125] , Framework Operation Environmental Management Plan [APP-126] and Outline Landscape and Ecology Management Plan [APP-108] will be developed further through the detailed design stage of the DCO process. The Applicant considers that the application versions of these plans are sufficient for this stage of project development. The Applicant would welcome more information on the Council's comments as to where it is considered that details are lacking.

ECDC-21	Ecology	Assessment	There is insufficient detail provided within the application to safely base conclusions of no significant effects on the ecological receptors identified within the zone of influence of the scheme.	The Applicant respectfully disagrees, and is currently undertaking further engagement with ECDC in order to elucidate the additional evidence required by ECDC to fully understand the impacts of the Scheme. With reference to Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040], important ecological features identified as part of the detailed baseline surveys are reported in Tables 8-4, 8-5, 8-6, 8-7 and 8-8, with an assessment of likely impacts and effects undertaken in section 8.9. Section 8.8 sets out avoidance and mitigation measures for important ecological features. The Biodiversity Net Gain Assessment [APP-259], using Defra's Biodiversity Metric 3.0, concludes that the Scheme will result in approximately 83% gain of habitat units, approximately 16% gain in hedgerow units, and approximately 1% gain of river units.
ECDC-22	Ecology	Assessment	The assessment of 'in combination' effects will be considered further in the Local Impact Report.	This comment is noted.
ECDC-23	Ecology	Mitigation	The OLEMP does not demonstrate how the scheme will deliver adequate biodiversity mitigation / compensation and deliver biodiversity net gain. It does not provide sufficient details about the creation, management or monitoring of the proposed habitats and key features, such that it can be ascertained that these measures will be adequate for their intended purpose.	The OLEMP [APP-126] will be developed further at the detailed design stage of the DCO process, however, details of management, maintenance and monitoring are set out in section 8.8 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] and section 1.8 of Appendix 10I, Landscape and Ecology Management Plan of the Environmental Statement [APP-108]. The Biodiversity Net Gain Assessment [APP-259], using Defra's Biodiversity Metric 3.0, concludes that the Scheme will result in approximately 83% gain of habitat units, approximately 16% gain in hedgerow units, and approximately 1% gain of river units.

				It is also noted that further detail will be provided in the detailed LEMP to be approved by ECDC, including how biodiversity net gain has been maximised, as secured by a requirement of the DCO.
ECDC-24	Ecology	Monitoring	Given the scale of the scheme and the sensitivity of some of the habitats and species, monitoring surveys for the first ten years only does not seem proportionate.	Ten years is considered a proportionate time period for monitoring the specific objectives of mitigation and enhancement features based on the habitats and species present and set against the context of a continuously changing farming environment. This will allow for any remedial actions to be taken during establishment to ensure ongoing success of mitigation and enhancement features.
ECDC-25	Ecology	Operations	There is a lack of information submitted or clarification in certain key areas of the OLEMP.	The Applicant would welcome the Council's comments on where information is considered to be lacking or needs clarification. The OLEMP is considered suitable for DCO submission; further detail will be provided in the detailed LEMP which will be prepared post consent and to be approved by ECDC, including how biodiversity net gain has been maximised, as secured by DCO Requirement.
ECDC-26	Ecology	Monitoring	There is no commitment to discuss the results of monitoring surveys of habitats and species with relevant stakeholders.	The Applicant will organise a meeting(s) with relevant stakeholders to discuss the results of monitoring surveys of habitats and species. Table 3-3 of the Framework Operation Environmental Management Plan [APP-126] includes the following commitment in relation to ecological monitoring: ' <i>Annual monitoring reports will be submitted for review and consultation with stakeholders, to allow any remedial actions to be identified and agreed.</i> '
ECDC-27	Ecology	Operations	There are no firm commitments to any process of habitat management. It is considered that it would be possible at this stage to give more detail on how habitats will be managed to retain and encourage biodiversity value. This is crucial, given the	Section 1.8 of Appendix 10I: Landscape and Ecology Management Plan of the Environmental Statement [APP-108] details the management, maintenance and monitoring of habitats, with additional reference to field management after establishment set out in Annex C of Appendix 10I, Landscape and Ecology Management

			extent to which the impact assessment relies on the delivery of compensatory habitats to deal with adverse effects.	Plan of the Environmental Statement [APP-108]. Management specific to Stone Curlew offsetting habitats are provided in the Offsetting Habitat Provision for Stone-Curlew Specification [APP-258]. Management of existing and new habitats has been designed to retain and encourage local biodiversity, such as acid grassland, terrestrial invertebrates, farmland birds and arable flora. Further detail on these measures and how habitat creation will link to form a coherent biodiversity network including their long term management, will be set out in the detailed LEMP to be approved by ECDC at the detailed design stage.
ECDC-28	Ecology	Habitats	The restoration of habitats in the Grid Connection corridor will be considered as part of the Local Impact Report.	This comment is noted.
ECDC-29	Ecology	Habitats	Habitat creation proposals are lacking in detail, including how they link to form a coherent nature network and their long-term management regimes.	Appendix 10I: Landscape and Ecology Management Plan of the Environmental Statement [APP-108] sets out the rationale for habitat creation, including how it forms a coherent nature network. For example, paragraph 1.7.29 sets out how the Scheme will align with and contribute to Buglife's B-Lines project, providing landscape scale benefits for pollinators through increased habitat provision and connectivity. Annex C sets out the indicative grass mixes to be sown across the Scheme and grazing regimes for management. Areas designated for conservation grazing have been incorporated to link in with the B-Lines project through allowing diverse grasslands to establish and be managed for the benefit of pollinators. Further detail on these measures and how habitat creation will link to form a coherent biodiversity network including their long term management will be set out in the detailed LEMP to be approved by ECDC at the detailed design stage.

ECDC-30	Ecology	Biodiversity net gain	It needs to be demonstrated that the net gain will be achieved through measures delivered in addition to mitigation and compensation for protected species	The Biodiversity Net Gain Assessment [APP-259], using Defra's Biodiversity Metric 3.0, concludes that the Scheme will result in approximately 83% gain of habitat units, approximately 16% gain in hedgerow units, and approximately 1% gain of river units. The Council's comments will be taken into consideration as part of an updated calculation of Biodiversity Net Gain which also include aspects such as follow up surveys for some habitats, all of which will be reported in a technical note which will be circulated to ECDC. Putting these changes into perspective, it is expected the current calculation of a net gain of about 83% habitat units, 16% hedgerow units and 1% of river units will not change substantially.
ECDC-31	Ecology	Biodiversity net gain	Currently, it would appear that Biodiversity Net Gain (BNG) is being committed to only for the 40-year life span of the energy farm. However, given the presence of highly valuable ecological receptors within the zone of influence of the scheme, and the landscape scale over which the scheme is operating and influencing habitat and species distribution, this should be reconsidered in at least some critical locations.	The Scheme will not remove landscape enhancements at the point of decommissioning and only the infrastructure elements of the Scheme would be removed, as set out in the Framework Decommissioning Environmental Management Plan [APP-125] . The BNG only needs to be reported for the duration of the Project – hence the reference to 40 years. If after decommissioning, when the land is no longer under the control of the Applicant nor covered by this consent, a land owner decides to remove vegetation, this would be subject to applicable planning or licensing requirements as appropriate at that point in time.
ECDC-32	Ecology	Biodiversity net gain	There are no plans showing the locations of the habitats that form the BNG assessment and the Defra Metric spreadsheet has not been supplied.	The Applicant acknowledges the Council's comments, and these will be taken into consideration as part of an updated calculation of Biodiversity Net Gain which will provide the detail as requested for the calculations using the latest Biodiversity Net Gain metric, 3.1 including locations of habitats. A technical note will be produced and circulated at the earliest convenience during the Examination process.

ECDC-33	Decommissioning	Ecology	The end of the project and the extent to which the site will return to its original state, is very much a crucial part of the decision-making process, in terms of ecology. There is no clarity regarding the fate of the compensatory and BNG habitats, post decommissioning. Given the scheme covers such a large area, this needs to be fully considered as part of the determination of the application.	The Scheme will not remove landscape enhancements at the point of decommissioning and only the infrastructure elements of the Scheme would be removed, as set out in the Framework Decommissioning Environmental Management Plan [APP-125]. If after decommissioning, when the land is no longer under the control of the Applicant nor covered by this consent, a land owner decides to remove vegetation, this would be subject to applicable planning or licensing requirements as appropriate at that point in time.
ECDC-34	Other	Draft development consent order	There is concern over the draft DCO wording and this will be further developed in the LIR.	This comment is noted.
ECDC-35	Water resources	Drainage	ECDC may wish to comment on flood risk, drainage and water resources further following the submission of LIR.	This comment is noted.
ECDC-36	Ecology	Trees	The Council's Tree Officer has significant concern over the proposal. The primary concern is that the significant lack of information means that ECDC will not be able to provide professional tree advice as part of the LIR. It is strongly recommended that the Inspectorate looks to gain its own Tree Officer in order to mitigate the developer's failure to provide sufficient information.	More detailed targeted tree surveys in accordance with BS5837 are ongoing which will build on existing information within the application. This will be shared during the Examination and is not expected to change the findings of the Environmental Statement.
ECDC-37	Ecology	Trees	The lack of information includes but not limited to: No proposed site plan with the tree locations plotted to show the relationship between the development and the retained trees (Root Protection Areas (RPA) and their proximity to the areas of construction) which should be included in a British	A Tree Constraints Report, Appendix 10B of the Environmental Statement [APP-101] which includes a Precautionary Arboricultural Method Statement (PAMS) has been developed by the project Arboriculturist to inform the design and associated mitigation. This information was taken account of in development of the Landscape Masterplans shown in Figures 10-14a [APP-209] to Figure 10-14f [APP-214] of the Environmental Statement and the Outline Landscape and Ecology Management Plan (OLEMP) [APP-108].

			Standard BS5837:2012 Trees in relation to design, demolition and construction – Recommendations (BS5837) report. - Information submitted relies on estimates of tree diameters. - No information indicating which trees or how may will be impacted/removed through this development so no assessment of the development impact on the existing vegetation can be assessed. - There appears to be trees omitted from the landscape master plans relating to sites EC01 W01 and W03 and hedging omitted from EC01, EC02, E05, W01, W02, W06, W08, W10, W11 and W12. The landscape master plans have omitted to show some significant tree areas and hedges that would border the sites and could be impacted by the development and new planting such as those adjacent W03, W08, W15, EC04 and EC05.	More detailed targeted tree surveys in accordance with BS5837 which focus on key trees identified in the Tree Constraints Report [APP-101] are ongoing and will build on existing information within the application. This will be shared during the Examination and is not expected to change the findings of the Environmental Statement. Measures for the control of any tree works are included in the Framework Construction Environmental Management Plan [APP-123], with the final CEMP to be approved by the local planning authority.
ECDC-38	Ecology	Application / Trees	There also appears to be conflict in information submitted: the Weirs Drove substation option 2 states that only parts of groups G9 and G10 will need to be removed yet the supplied plan indicates that all of group G10 which is recorded as category B will be removed.	The Applicant would be happy to meet with the council to clarify this matter. G10 is not indicated for removal on the submitted plans in relation to Option 2, it is identified for part removal only.
ECDC-39	Ecology	Draft development consent order	In addition there is extreme concern that the draft DCO Explanatory Memorandum and Draft Development Consent Order state that the felling or lopping of trees and	A suitably qualified arboriculturist has been engaged since the early stages of the Scheme to inform the design and draft the Tree Constraints Report, Appendix 10B of the Environmental Statement [APP-101] which

			removal of hedgerows regardless of the presence of Tree Preservation Orders can be undertaken with no consultation or permissions or any professional arboricultural recommendations/ assessment/ oversight or to any recognised professional standard (British Standard BS 3998:2010 Tree work – Recommendations or European Tree Pruning Standard 2021). There is also no obligation for any replacement planting regardless of the potential habitat implications. These documents also mention compensation but do not provide any information as to how this will be calculated while it would be expected to be done via the Capital Asset Value for Amenity Trees (CAVAT), which is an accepted means of converting a trees worth into a monetary figure.	includes a Precautionary Arboricultural Method Statement (PAMS). This document provides information on the likely quality and value (in terms of BS5837 quality categories) of individual and groups of trees within the Sites and along the cable corridor. This has influenced the design to reduce the impact on trees as far as possible. However, as the design is still evolving and will only be finalised at the detailed design stage the intention is that the Tree Constraints Report [APP-101] and PAMS will be updated and a fully compliant BS5837:2012 Arboricultural Impact Assessment (where tree related impacts are relevant, with an accompanying Tree Protection Plan) to micro-site the infrastructure and determine the replacement planting requirements at the detailed design stage. Measures for the control of any tree works are included in the Framework Construction Environmental Management Plan [APP-123], with the final CEMP to be approved by the local planning authority. Articles 36 and 37 reflect standard DCO drafting that is required to ensure that the Applicant has sufficient powers to deliver and operate this nationally significant infrastructure project and that owners of trees are appropriately compensated. The provisions do not seek to assign any means of calculating compensation due on the exercise of the powers contained within those articles because section 126 of the Planning Act 2008 prohibits the inclusion in a DCO of any provision the effect of which is to modify the application of a compensation provision, except to the extent necessary to apply the provision to the compulsory acquisition of land authorised by the Order. Ultimately, a dispute between the Applicant and the owner of a tree as to compensation would be resolved by the Upper Tribunal (Lands Chamber) in accordance with articles 36(3) and 37(4)

				and so it is not necessary for the DCO to make further provision. Mitigation for unavoidable tree removals in the form of replacement tree planting is shown in outline on the LEMP [APP-108]; and information on trees to be removed and how they will be removed will be shown on the LEMP which will be developed in detail post consent and will be approved by the relevant planning authority pursuant to requirement 8 of the DCO. The draft DCO [APP-019] will be amended early in Examination to make clear that this must be provided prior to any vegetation removal, including as part of any permitted preliminary works.
ECDC-40	Landscape and visual amenity	Cumulative effects	The Council's Landscape officer has provided significant concerns whether the intra- and inter-cumulative and sequential effects on landscape, historic landscape, users of the public highway/Public Rights of Way (PRoW) are fully explored and minimised.	Effects on the landscape as a resource in its own right and effects on people's views of the landscape have been considered separately in line with best practice. Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] and associated appendices provide a detailed assessment of landscape and visual effects on each receptor in relation to each site within the Scheme and also the Scheme as a whole. This allows distinctions to be drawn between the impacts which would arise from separate parts of the Scheme and intra-project effects which would arise from the Scheme as a whole. The Scheme has been designed to minimise the number and duration of Public Rights of Way (PRoW) closures. The proposed closure of eight PRoWs are outlined within Chapter 13: Transport and Access of the Environmental Statement [APP-045] and Traffic Regulation Measures Plans - Road Closures [APP-009 to APP-011]. The closure of the PRoWs are expected to be no more than three weeks which is considered a worst-case scenario and therefore not considered to have a significant or long-term impact. The closures cannot be programmed

				at this stage of the project, but it is likely that, due to their purpose, they will not occur simultaneously and will therefore have isolated, rather than cumulative, impacts. Regarding the impact the site accesses have on landscaping, the initial site access review identified large amounts of vegetation to be trimmed or removed r to accommodate the full visibility splay requirements based on the speed limit of the highway (e.g. 60mph/100kph = 215m visibility splay). Therefore, the site access strategy was developed to include temporary speed reductions and temporary traffic signals to substantially reduce the amount of vegetation to be removed/trimmed as embedded mitigation.
ECDC-41	Landscape and visual amenity	Cumulative effects	Elements of the scheme, such as road improvements, have not been included in the Landscape and Visual Assessment (LVIA) despite the potential adverse effect on the rural landscape.	All aspects of the Scheme relevant to landscape and visual effects have been considered in the Landscape and Visual Impact Assessment summarised in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042]. This includes the mitigation for other topics set out in the Schedule of Environmental Mitigation [APP-257]. Road improvements proposed are minor and localised and have been designed to minimise landscape and visual impacts, informed by the Landscape and Visual Impact Assessment and in line with the principles set out in the Design and Access Statement [APP-264].
ECDC-42	Landscape and visual amenity	Cumulative effects	Cumulative effects with other schemes (Chapter 10.11) do not appear to be fully integrated within the assessment of landscape and visual effects. It also appears that some significant Environmental Schemes are not considered including North Angle Solar Farm (CCC/20/051/FUL and CCC/21/237/VAR) and the Solar Farm to East of Breach Farm (21/00706/ESF).	The assessment of cumulative landscape and visual effects is set out in Section 10 of Chapter 10: Landscape and Visual Effects of the Environmental Statement [APP-042]. It is based on the 'combined' impacts and effects of the Scheme with the cumulative schemes set out in Appendix 5A of the Environmental Statement [APP-055] and is separate from the assessment of the landscape and visual effects of the Scheme in isolation. This is common practice to draw clear distinctions.

				Regarding North Angle Solar Farm (CCC/20/051/FUL and CCC/21/237/VAR), this scheme lies to the west of Soham and outside of the study area defined for the Landscape and Visual Impact Assessment (LVIA). It was therefore scoped out of the assessment of likely cumulative landscape and visual effects presented in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042]. An assessment of the cumulative effects of the proposed Breach Solar Farm (21/00706/ESF) has now been made and is included in Appendix A of this Relevant Representations response document. It concludes that there would be moderate adverse cumulative effects on LLCA 36: Burwell Fen during construction, which are considered significant. These effects would be short term and temporary. Effects during operation and decommissioning would be not significant.
ECDC-43	Landscape and visual amenity	Cumulative effects	Within the Environmental Statement it considers any effect more than five years (ES Chapter 4, para 5.6.2) to be long term. An assessment of landscape and visual effects at this point in time has not been provided despite being asked for previously by a planning officer within ECDC. Without this 5 year assessment, it is difficult to assess the effects of these mitigation measures over time. This is of particular relevance for viewpoints where adverse effects are within cultural heritage settings.	As explained in Table 10-2 of Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042], a year 5 assessment has not been undertaken as it is considered that the year 1 and year 15 are proportionate and in line with the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition (GLVIA3). Paragraph 10.3.11 (d) of Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042], sets out assumptions regarding the height of proposed planting reaching between 4m and 6.5m by year 15 of operation. Based on the assumed growth rate of 20cm per year, by year 5 of operation it can be assumed that proposed planting would have reached a height of 1.6m to 2m. Based on an average eye height of 1.7m assumed in the visual assessment, this planting would therefore begin to become effective in screening

				and filtering close range views by year 5 of operation. Many factors can affect the growth rate of planting, such as the weather and pest and disease attack. This is mitigated by the measures set out in the Outline Landscape and Ecology Management Plan [APP-108]. It is possible to provide some estimates on how tall proposed planting could be by year 5 of operation, based on the assumptions set out in paragraph 10.3.11 of Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042]. Assuming that the growth rate of 20cm per year stated in 10.3.11 (d) was applied to hedgerows and woodland planted with forestry transplants of 40 to 80cm, by year 5 of operation, these may on average have grown to approximately 1.4m to 1.8m. At this height, proposed vegetation would begin to provide an effective visual screen, based on average eye height of 1.5 to 1.7m above ground level (GLVIA3, paragraph 6.11). This does not take consideration of the proximity of the receptor or the elevation of the viewing place relative to the Scheme, which may affect the extent of views. To illustrate these assumptions, year 5 photomontages have been prepared for the following viewpoints and issued to the LPAs: • Viewpoint 5: View south-east from Beck Road (Sunnica East Site A) • Viewpoint 15A: View south from U6006 (Sunnica East Site B) • Viewpoint 32: View south-west from La Hogue Road (Sunnica West Site A) • Viewpoint 46: View north from Fordham Road (Sunnica West Site B).
ECDC-44	Landscape and visual amenity	Cumulative effects	It should be ensured that non-significant effects are fully addressed and minimised, as their accumulation can result in overall significance.	Effects on the landscape as a resource in its own right and effects on people's views of the landscape have been considered separately in line with best practice. Chapter 10: Landscape and Visual Amenity of the

				Environmental Statement [APP-042] and associated appendices provide a detailed assessment of landscape and visual effects on each receptor. This includes an assessment of landscape effects at different scales and on sequential views from roads and public rights of way, which have been assessed with reference to representative viewpoints. Mitigation, including offsets and planting, has been proposed to address and minimise adverse effects (including non-significant effects) on the character of the landscape experienced along the route and views of the landscape. This is in line with the agreed methodology and the proportional approach advocated by the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition.
ECDC-45	Other	Landscape	The lifespan of the development, the length of adverse impacts and benefits maintained after the development will need to be explored in the determination of this application.	As noted in paragraph 10.3.6 of Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042], the following terminology and durations have been used for the landscape and visual assessment: a. Short term durations are considered to be two years or less; b. medium term durations are considered to be between two and ten years; and c. long term durations are considered to be more than ten years. Paragraph 10.3.7 states that the Local Planning Authority (LPA) response to the Applicant's engagement (17 February 2020) noted these terms and durations were acceptable. To draw distinctions between the duration and permanence of effects, the following assessment years were considered: a. Scheme construction (winter); b. Scheme operation year 1 (earliest 2025) (winter); c. Scheme operation year 15 (earliest 2040), (summer); and

				d. Scheme decommissioning (earliest 2065), (summer). This is in line with the methodology set out in Appendix 10C of the Environmental Statement [APP-102] and the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition (paragraph 3.22).
ECDC-46	Landscape and visual amenity	Mitigation proposals	Current inconsistencies within the Environmental Statement with regards to the retention of the gained Green Infrastructure create uncertainty. If the intention is for the Green Infrastructure to reflect the surrounding landscape character/context this should again form part of the LEMP.	The vision and principles for the proposed Green Infrastructure are set out in the Outline Landscape and Ecology Management Plan [APP-108]. All landscape enhancements will remain in situ after decommissioning and only the infrastructure elements of the Scheme would be removed, as set out in the Framework Decommissioning Environmental Management Plan [APP-125]. If after decommissioning a landowner decides to remove vegetation, this would be subject to applicable planning or licensing requirements at this time.
ECDC-47	Landscape and visual amenity	Mitigation proposals	There continues to be a lack of relevant details in the submitted application, this does not promote the full and clear understanding of the landscape and visual effects of the proposal. This may substantially limit the ability to provide precise comments within the LIR.	The findings of the Landscape and Visual Impact Assessment are summarised in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] with related appendices providing detail on policy, methodology, baseline and assessment of effects [APP-100 to APP-107]. These documents, read alongside the Landscape and Ecology Management Plan [APP-108] and supporting figures [APP-191 to APP-232] provides a full and clear understanding of the landscape and visual baseline and likely effects of the Scheme.
ECDC-48	Noise and Vibration	Construction Phase Noise	Relying on fixed limits for Lowest Observable Adverse Effect Level (LOAEL) and Significant Observed Adverse Effect Level (SOAEL) for all sensitive receptors for the duration and over the wide-ranging area of the development may underestimate the impacts. Therefore, recognition of the subjectivity of noise impacts may be required to clarify the	The assessment of construction noise follows national policy requirement by defining the LOAEL and SOAEL and was undertaken based on the current industry standard approach. There is no existing research on construction noise effects to aid defining of the LOAEL and SOAEL. Consequently, the LOAEL and SOAEL for construction noise have been referenced from other DCOs that have gone to Examination and there is no

			impact as the project progresses, in addition to any noise monitoring data during the period of construction.	evidence available to show that the approach is not robust. The assessment of construction noise is based on a worst-case scenario with predicted noise levels assuming construction activities are taking place at the closest part of the site to each identified receptor. As such, in reality, reported noise levels and effects are likely to be lower for the majority of the construction programme. Noise monitoring (secured through a Section 61 consent) will be undertaken during construction works to log maximum construction noise levels and variability in noise levels throughout the construction programme.
ECDC-49	Noise and Vibration	Construction Phase Noise	The Framework CEMP advises a noise construction mitigation and monitoring scheme to be developed and agreed prior to commencement of works, as part of the S61 consent application process under the Control of Pollution Act 1974 (COPA). LA's have 28 days in which to consider a S61 application. For a site of this size and geographical extent it is not considered an appropriate timescale for full consideration to be given to an application to enable agreement as to limitations, working methods, conditions etc.	The detailed CEMP will set out proposals for how consultation will take place with local authorities to agree a suitable schedule for S61 applications. This requirement will be set out in the next iteration of the Framework CEMP [APP-123].
ECDC-50	Noise and Vibration	Operational Phase Noise	Low frequency hum from any of the proposed fixed plant is an issue that needs to be considered, and technical evidence provided in any final report if predictions show negligible adverse impact. Plant types and specifications have not yet been confirmed. ECDC will want to ensure that it can be demonstrated that estimates of impacts have not been underestimated.	Plant will be selected and designed to minimise any tonal components. Residual operational noise effects at receptors within Table 11-20 of Chapter 11: Noise and Vibration of the Environmental Statement [APP-044] shows that operational noise levels are not assessed as significant. Low frequency noise complaints tend to originate from people who have a high sensitivity to low frequency noise. There can be no guarantees that the low frequency response of residents in the East Cambridgeshire area is typical so there may be

				complaints. However, as no significant effects are identified and noise predictions indicate low absolute levels of noise at receptors, complaints are considered unlikely. Pursuant to the Framework Operational Environmental Management Plan [APP-126], the Operational Environmental Management Plan to be approved by ECDC will include information on how the Scheme design and operational plant levels have been developed to mitigate and reduce effects to a minimum. This will include consideration of sound output levels, the noise from inverters and cooling fans during lower modes of operation, positioning of plant and, if necessary and practicable, implementation of acoustic barriers.
ECDC-51	Noise and Vibration	Operational Phase Noise	There is considered to be levels of uncertainty in the baseline background data or due to the issue of lower frequency noise impacts not being characterised within an LAeq measurement under BS4142, for continual review of assessments and predictions, and assurances provided that the final design and position of plant and equipment will have no adverse impact.	Baseline noise monitoring was undertaken in accordance with guidance within BS4142. Every effort has been made such that measurements were undertaken in such a way as to provide a representative sample of conditions, such as avoiding periods of adverse weather conditions, and school holiday periods (which are often considered to result in atypical sound levels). A small degree of uncertainty will always remain in the values taken from such a measurement survey; however, the method applied during measurement and assessment of noise data provides confidence that it is robust.
ECDC-52	Noise and Vibration	Operational Phase Noise	In regard to specifically Burwell Substation extension low frequency 'hums' from transformers on large substation sites can be an area of concern for people living close to such sites. It is often reported that low frequency sounds vary in their audibility possibly during certain weather conditions or the number of transformers operating at any one time or the loading on the transformers themselves. Reports from persons affected by low frequency sounds generally suggest it can have a significant detrimental effect on their	The assessment of the proposed Burwell Substation extension considered Option 2, which is closest to sensitive receptors and considered the worst-case. The assessment of changes in substation noise did not identify any significant effects. The Applicant has since submitted a changes application that includes the removal of the Burwell Substation extension (Option 1) from the Scheme. As such, there are no proposed changes to the Burwell Substation and noise conditions will be unchanged at receptors affected by noise emissions from the Burwell Substation.

			wellbeing. The data is not considered to be sufficient at this time, to provide confidence that an expansion to the transformers on this site will not have a cumulative effect on low frequency noise levels in the vicinity of the Burwell site.	
ECDC-52	Noise and Vibration	Construction Phase Vibration	Piling is often the source of complaint. This may be due to the type of sound produced and the repetitive nature of the activity. The submission at this stage does not contain details that provide suitable reassurance that the activity of extensive and widespread piling will not cause a degree of adverse impact. It is recommended a section of the CEMP to contain a Piling Method Statement to be agreed with the Council before any such work takes place.	The requirement for a Piling Method Statement will be added in the next iteration of the Framework CEMP [APP-123] .
ECDC-53	Noise and Vibration	Decommissioning	Comments made on noise and vibration impacts during construction phases will remain relevant to decommissioning of the site, and appropriate mitigation will be explored further within the Local Impact Report.	This comment is noted.
ECDC-53	Noise and Vibration	Draft Development Consent Order	It is likely the DCO will contain a requirement that "exempts" the developer from action under Section 79 of the Environmental Protection Act 1990 (Statutory Nuisance) as is usual in these cases. However, due to the nature, size and duration of this development it is likely to cause complaint and there is an expectation that there will be cooperation with ECDC in finding a resolution where complaints are received and found to have merit. An assurance, should be provided, within the relevant documents to this effect	The Framework Construction Environmental Management Plan [APP-123], provides, in Table 3-6, for the monitoring of noise complaints, keeping of a logbook and reporting for immediate remedial action. It also states that the Applicant will seek a section 61 consent for construction activities, where, if ECDC requires further steps to be taken, this can be agreed. This could alternatively also be considered in the approval process for the detailed CEMP, pursuant to Requirement 14 of the draft DCO [APP-019].

			and that a robust complaint management procedure is developed to support it.	
ECDC-54	Land Use	Loss of farmland	ECDC, following discussion, note that Cambridgeshire County Council are providing a detailed response on this, which will form part of a planned joint LIR. ECDC will want to provide comment on loss of this amount of farmland, once it has had time to consider the detailed comments within the LIR.	This comment is noted.
ECDC-55	Economy	Employment	It should be noted that the employment/GVA figures are predicated on a 45 minute travel study (based on driving) that is initially tabulated in 12-1, and then importantly referenced in table 12-26. It is not possible to find or assess the radius of this 45 minute area and Sunnica's related source calculations (AECOM 2021) relating to employment assumptions and effects on the District.	The employment assumptions related to travel area/leakage are based on the employment within the 45 minute travel area as derived from Census data, rather than a simple radius from the Scheme. A map of the travel area is included in Figure 12-1 of the Environmental Statement [APP-237] . The total employment is presented in Chapter 12: Socio-economics and Land Use [APP-044] . The data table underpinning this can be provided to East Cambridgeshire District Council.
ECDC-56	Economy	Employment	Broadly, whilst it is welcomed additional employment within the District there is agreement with Sunnica's own assessment that this is construction led employment (over 24 months), and as such has a limited and moderately beneficial impact to the Districts economy. Once operational the site will provide low levels of employment opportunity.	The Applicant acknowledges that the larger share of employment will be generated in the construction phase, over the planned two year construction period. Employment will be generated during the operation stage, but at a lower rate although these will be long-term jobs, over the lifetime of the Scheme. The respective effects arising remain as set out in the Environmental Statement.
ECDC-57	Economy	Employment	With the construction sector being short of labour and the wider regional economy (sectors such as house building) creating high demand, Sunnica's recruitment plan will face challenges. The probable/possible outcome may reflect the	The anticipated construction employment to be used from within the 45-minute travel area is an estimate based on the current information available and based on professional judgement making use of best practice guidance as far as is possible. The Applicant recognises that when construction commences, the dynamics of the

			need to increase recruitment outside the study area. A risk analysis of this should be provided to assess the potential to recruit from within the district and onward GVA predictions.	labour market could indeed alter the amount of labour required from outside the 45-minute travel area. To maximise and expand the economic benefits of the Scheme for the local community an Outline Skills, Supply Chain and Employment Plan has been included in the Application [APP-268]. Risk analysis is not part of the scope of an environmental impact assessment. The purpose is to assess whether there are significant beneficial or adverse effects from a proposed Scheme, this assessment has been undertaken accordingly.
ECDC-58	Economy	Employment	It is welcomed that the SEF 7.7, 'seven potential opportunities', references skills and training. However, it is questioned the ambition when applied to a short term construction project versus the longer term operational requirement. Long term adult education, upskilling and apprenticeships develop and link to sustainable career prospects in new technologies and sustainable sectors are strongly encouraged. A method of Sunnica monitoring this and reporting outcomes will be important	This is acknowledged and a methodology of the Applicant's intentions for monitoring and reporting of outcomes is included in the Outline Skills, Supply Chain and Employment Plan [APP-268] included in the Application. This plan will be developed in consultation with the Local Authorities, including monitoring and reporting of outcomes. The Plan promotes the investigation of measures to promote take up of jobs generated by the Scheme by local people, including through engagement with Local Authorities and Job Centre Plus, in order to tap into existing local employment support networks.
ECDC-59	Other	Impact on horse racing industry	The applicant appears to have failed to conduct a detailed assessment of the impact of the proposal at the construction, operation and decommissioning stages on the horse racing industry. Further details on this point will be considered in the Local Impact Report (LIR). However, it is expected that those in the horse racing industry will comment and that their comments will be given substantial weight by the decision maker.	The assessment of effects as presented in the Environmental Statement has taken into account the potential for effects on relevant receptors within the horse racing industry within several chapters. Within Chapter 12: Socio-economics and Land Use of the Environmental Statement [APP-044], consideration has been given to effects on receptors as businesses that might experience direct land take or indirect impacts such as from traffic or disturbance. This includes Godolphin Gallops and Limekilns Gallops. There would be no effects on these businesses from these impacts with no assessment therefore being presented. Effects

				on users of public rights of way that might include equestrian users from temporary and permanent impacts on these have been assessed and no effects are expected. Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] includes an assessment of effects on the views and visual amenity of people training horses. People training racehorses are focused on their activity. It is recognised that the landscape context and setting is important to these views. No development is proposed within the land associated with these facilities, but the Scheme does have the potential to affect its setting as set out in the assessment of landscape effects (Appendix 10G: Landscape Effects [APP-106]) People working at and visiting the Snailwell/Godolphin Gallops are represented by viewpoints VP39b and VP39c. Despite the proximity of Sunnica West Site A to the Snailwell Gallops, effects on the views of people working and visiting there are assessed as not significant in all scenarios. This is because of the substantial, dense belt of existing trees and shrubs which line the eastern boundary of the Snailwell Gallops, which will screen the majority of the Scheme. Further mitigation is proposed within a section of approximately 350m where this vegetation is less dense, which coincides with the location of a runway of the former RAF Snailwell. A temporary fence will be erected in this location while proposed planting establishes. Horses training on the Snailwell Gallops run parallel to this vegetation, uphill from close to the bridge carrying bridleway 204/5 across the A14, where the land lies from approximately 25m Above Ordnance Datum (AOD) towards Snailwell at approximately 40m AOD.

				Equestrian users of the Jockey Club and members of the public whom informally view the horses between breaks in the roadside vegetation are represented by viewpoint 38. The Limekilns Gallops, which extend to approximately 80 ha, are separated from the Scheme by the busy A14 trunk road and the Cambridge to Ipswich railway line, which runs parallel to the south. This facility is used during the summer and includes the Golden Mile, Long Gallop, Short Gallop and Round Gallop. The land rises from approximately 30m AOD in the north to 60m AOD in the south, with the highest point and most open views towards the site available along the edge of the Limekilns Gallops, parallel to Well Bottom (B1506). These views north towards the Scheme are from within the Limekilns Gallops or from small gaps in the tall, dense roadside hedgerow, where owners and trainers observe racehorses training. Horses in this section of the Limekilns Gallops train east/west, parallel to the B1506. Views of the site quickly reduce in extent on descending the hill towards the A1304, which divides the gallops. This is evident from the combined ZTV shown in Figure 10-11f [APP-206], which has been updated to reflect the Order limits and is included in the Deadline 1 Examination deliverables issued to the ExA. This figure indicates that parts of both Sunnica East and Sunnica West are visible from the top of the hill but views from the bottom of the hill are limited to parts of Sunnica West Site A. Effects on views are assessed as moderate adverse in all scenarios, which is considered significant. This is principally driven by the extent of development visible from the top of the hill within Sunnica West Site A, which will be visible across the central part of the background, beyond the A14. Planting is proposed as mitigation along the southern edge of Parcels W05 and W07 to soften views. However, given the elevation of the viewpoint in relation to the lower lying site, this will not have grown

				sufficiently by year 15 of operation to screen views of the solar panel arrays and associated infrastructure. In summary, for the majority of people involved in training racehorses, views of the landscape are secondary to their activity, which is their main focus. From the Snailwell Gallops, the Scheme would be mostly screened by existing vegetation. The wider landscape, which includes parts of the Order limits, forms a broader backdrop to views from the higher ground of the Limekilns Gallops north east of Newmarket. The Scheme will be visible in places across this background, beyond the busy A14 trunk road and softened by existing vegetation and planting proposed as mitigation for the Scheme.
ECDC-60	Transport & Access	Traffic	It is considered that the influx and outflow of significant numbers of construction workers and HGV traffic during the construction phase will have a potential substantial impact on the road networks around the district, particularly at peak travel times. This connected to existing business commuting time, local community travel and impacts on existing community stakeholders such as businesses and residents will need to be considered.	There is a substantial amount of embedded mitigation proposed in the Framework Construction Traffic Management Plan and Travel Plan [APP-118] which will limit the impacts of traffic and transport in relation to the construction phase. The construction staff are forecast to travel to the site before 0700 and depart the site after 1900 as a result of the working hours during the construction period of 0700-1900. Therefore, the construction staff vehicles are on the highway network outside of the peak hours. The impact of the construction staff vehicles and HGVs on the highway network is analysed in detail in Chapter 13: Transport and Access of the Environmental Statement [APP-045] and Transport Assessment [APP-117]. With the embedded mitigation in place, the analysis concludes that there will not be any significant environmental effects arising in relation to traffic and transport.
ECDC-61	Other	Quality of life	The Councils local work/life ethos is predicated on maintaining the district as a desirable place to live. East Cambs is highly rated for is 'quality of life'. The	The quality of life for local communities has been considered in the assessments undertaken as part of the Environmental Impact Assessment and detailed within the following submission documents:

			impact of this development should be considered in this respect and explained.	- Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042]; - Chapter 11: Noise and Vibration of the Environmental Statement [APP-043]; - Chapter 12: Socio-Economics and Land Use of the Environmental Statement [APP-044]; - Chapter 13: Transport and Access of the Environmental Statement [APP-045]; - Chapter 14: Air Quality of the Environmental Statement [APP-046]; and - Chapter 15: Human Health of the Environmental Statement [APP-047]. It has been assessed that there would be no likely significant effects for noise and vibration, transport and access, air quality and human health. A summary of the likely significant effect predicted for landscape and visual amenity and socio-economics and land use is provided in Chapter 18: Summary of Significant Environmental Effects of the Environmental Statement [APP-050].
ECDC-62	Landscape and Visual Amenity	Impact on AONB	The district is also an area of natural beauty, tourism and other visitors that positively impact the local economy. The impact of this development may have some negative impact.	The Applicant's EIA Scoping Report [APP-051] submitted to PINS contained no specific reference to an assessment of effects on tourism as no specific receptors, such as visitor attractions, had been identified within the defined study areas to justify such an assessment being needed. The Scoping Opinion [APP-052] response received from PINS also did not request that such an assessment was required. However, Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] did assess the impact on visitor views in the vicinity of the Scheme and the loss of long-distance views as relevant. This includes from PRoWs which provide the main opportunity for recreation in this otherwise predominantly agricultural area. Accordingly, Chapter 12: Socio-economics and Land Use of the Environmental Statement [APP-044]

				also assessed impacts on PRow users which could include visitors to the area. On this basis, potential effects on tourists were assessed in the Environmental Statement in so much that effects on views and use of PRowS were set out which comprise the main matters of potential impact. The assessment concluded that there would be no significant effects.
ECDC-63	Human Health	Lighting	Lighting during construction phases will require adequate controls to minimise glare and spill whilst providing safe working environments and the Environmental Health Officer accepts the proposals and the controls that have been identified within this document, but again control requirements will need to be reviewed throughout the construction period.	This comment is noted and the Applicant agrees with this point. As stated in the Framework Construction Environmental Management Plan [APP-123] , artificial lighting will be provided to maintain sufficient security and health and safety for the construction site, whilst adopting mitigation principles to avoid excessive glare, and minimise spill of light to nearby receptors (including ecology and residents), outside of the Order limits as far as reasonably practicable.
ECDC-64	Human Health	Impacts	It is likely that the proposal will have some negative impacts on health, due to closure of rights of way for instance. ECDC will likely want to provide comments on this once it has had chance to see and review comments from Cambridgeshire County Council. However, the intra- and inter-cumulative, and sequential effects, on landscape character, cultural heritage assets (such as Chippenham Hall Park, Grade II listed) and on the perceptions and experiences of recreational and transport users of highways, Public Rights of Way, promoted and cycle routes will need to be fully explored and minimised.	In total there are eight PRowS which are required to be temporarily closed for a short-term period during the construction phase. Diversions are not proposed as part of the Scheme as each closure is expected to be for a maximum of three weeks, which is expected to be a worst-case scenario. Each of the short-term temporary closures of the PRowS will occur at different stages therefore each will be impacted separately at differing stages of the construction. Advanced notice will be provided of the PRow closures. The Scheme has been designed to minimise the PRow closures in terms of the number of closures and their duration. The impact on Non-Motorised Users (NMUs) (pedestrians, cyclists and horse-rider) as well as the closures of the PRowS are considered in Chapter 12: Socio-economics and Land Use, Chapter 13: Transport and Access and Chapter 15: Human Health of the Environmental Statement [APP-044] [APP-045] [APP-047] , the Transport Assessment [APP-117] , the Framework Construction Traffic Management Plan and Travel Plan [APP-118] and the

				Traffic Regulation Measures Plans – Temporary Road Closures [APP-009 to APP-111]. As a result, it is assessed that the PRow closures will not have a significant impact in EIA terms. The impact on Chippenham Hall Park as a cultural heritage asset is assessed in Chapter 7: Cultural Heritage of the Environmental Statement [APP-039]. In accordance with Historic England guidance, public access to an asset would not be a consideration in its assessment; therefore, it has not been considered in terms of any public right of way. In terms of landscape impacts and health, please see ECDC-65.
ECDC-65	Human Health	Landscape Impact	In regard to the impact on Landscape, in its entirety the scheme is likely to adversely affect residents' quality of life, contrary to the Design Principles of the National Infrastructure Commission and the Missions in the Levelling Up White Paper 2022 (Executive summary p.7) regarding well-being and Pride of Place.	The quality of life for local communities has been considered in the assessments undertaken as part of the Environmental Impact Assessment and detailed within the following submission documents: • Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042]; • Chapter 11: Noise and Vibration of the Environmental Statement [APP-043]; • Chapter 12: Socio-Economics and Land Use of the Environmental Statement [APP-044]; • Chapter 13: Transport and Access of the Environmental Statement [APP-045]; • Chapter 14: Air Quality of the Environmental Statement [APP-046]; and • Chapter 15: Human Health of the Environmental Statement [APP-047]. There would be no likely significant effects for noise and vibration, transport and access, air quality and human

				health. A summary of the likely significant effects predicted for landscape and visual amenity and socio-economics and land use is provided in Chapter 18: Summary of Significant Environmental Effects of the Environmental Statement [APP-050] . In summary, it is considered that the Scheme is not likely to adversely effect resident's quality of life, in light of the extensive designed-in mitigation proposed as part of the Scheme.
ECDC-66	Glint and glare		ECDC Environmental Health Team are unable to comment on the acceptability or otherwise of the proposals and so would recommend that all parties with an interest in this consequence of the proposal are consulted. This should include (but not be restricted to) the effects on aircraft, highways, railways, footpath users and recreational users of land and those premises identified as likely to be affected.	This comment is noted. The Applicant has carried out extensive non-statutory and statutory consultation in accordance with the Planning Act 2008 which is described in detail in the Consultation Report [APP-026 to APP-031] .
ECDC-67	Human Health	Battery Fire Safety	The local community has raised concerns regarding the safety, in the event of a fire, of the sizable and numerous Battery Energy Storage Systems (BESS).	The draft Development Consent Order [APP-019] includes requirement 7 in Schedule 2 which secures the Battery Fire Safety Management Plan ("BFSMP"). The BFSMP is to be approved by the relevant planning authorities, in consultation with the fire and rescue services. The BFSMP must be in accordance with the Outline BFSMP which accompanies the Application [APP-267]. The Outline BFSMP provides a comprehensive review of the life safety and property protection fire safety requirements of the BESS at Sunnica East Site A, Sunnica East Site B and Sunnica West Site A. With the measures outlined in the Outline BFSMP the Scheme does not give rise to a significant fire risk and any remaining risk that does exist can be addressed by ensuring that the Scheme is constructed, operated and decommissioned in accordance with those measures. The Applicant intends to submit the revised draft of the

				Outline Battery Fire Safety Management Plan at Deadline 2. These documents have considered the nearest receptors in all directions (250m away). These are considered to represent a worse case in comparison to other receptors located further away. Two locations that have been considered are the Pines Primary School in Red Lodge, and Brookside Stud. Both locations can be seen in Figure A2 of Appendix 16D: Unplanned Atmospheric Emissions from Battery Energy Storage Systems (BESS) of the Environmental Statement [APP-124]. All off-site receptors are located far enough from the BESS site that a measurable change of pollutants would not be able to occur with the level of dilution demonstrated to occur over this distance, for the scale of BESS proposed. Source concentrations would be diluted to 1/1000th of the source concentration (a dilution factor of 0.001) under 90% of the meteorological conditions likely to occur at the site, within 50m or less for all wind directions. Assuming the unlikely scenario that there is a 5-rack fire at the BESS before fire control measures bring the fire under control, emissions of Hydrogen Fluoride (HF) over time periods of 10 minutes, 1 hour or up to 6 hours would be below the Acute Exposure Guideline Level (AEGL-1) value at locations within 100 m of the fire (and by definition at lower concentrations further afield due to dispersion of pollutants). In most instances the AEGL-1 value would be achieved within the Order limits itself and in all cases in a shorter distance than that to the nearest sensitive receptors.

2.4 RR-1351 West Suffolk Council

Applicant responses to RR-1351

Applicant's Ref.	Theme	Issue	Summary of issue raised	Applicant's response

WSC-1	Other	Development Consent	WSC does not support the proposal as it stands and considers that development consent should not be granted for the proposal as submitted. WSC has significant concerns regarding the scale of the proposal as submitted and the resulting impacts, which will be fully explored in the LIR.	This comment is noted, however the Applicant respectfully disagrees and considers that development consent should be granted for the Scheme. The Scheme will be a critical part of the development of the UK's portfolio of large-scale solar generation required to decarbonise its energy supply quickly and provide secure and affordable energy supplies. The Applicant will continue to work with West Suffolk Council and seek to address its concerns. Regarding the scale of the Scheme, the Statement of Need [APP-260] sets out why large-scale solar generation projects in general, and the Scheme in particular, are needed in order for the Government's objectives and commitments for the energy system and addressing the causes of climate change to be achieved. Section 7 of the Planning Statement Part 1 [APP-261] considers the planning balance of the Scheme. This sets out at paragraph 7.1.5 that the Scheme will deliver against the above policy objectives and commitments and will be a critical part of the national portfolio of renewable energy generation that is required to decarbonise the country's energy supply quickly whilst providing security and affordability to the energy supply. At paragraph 7.1.8, the Planning Statement Part 1 [APP-261] explains that with the mitigation that is proposed, the Scheme avoids significant adverse effects in relation to designated landscapes, biodiversity sites or protected species or habitats; flood risk and water quality; transport networks; access; noise and vibration; soils; air quality and land uses. It acknowledges that the Scheme will result in residual significant adverse effects upon landscape and visual receptors and heritage assets. With regard to the landscape impacts, paragraph 7.1.9 of the Planning Statement Part 1 [APP-261] explains that landscape and visual impacts have been minimised by the

				design of the Scheme and sets out that: <i>"In terms of the planning balance, the fact that these effects are localised; will be reversed following the 40 year operational period; and that NPS EN-1 and Draft NPS EN-1 acknowledge that adverse effects are likely, given the scale of energy NSIPs, the national benefits of the Scheme outweigh these localised effects."</i> Regarding impacts on heritage assets, paragraph 7.1.10 of the Planning Statement Part 1 [APP-261] sets out that a total of three designated heritage assets would experience a time limited and reversible loss of significance to their setting, and that these impacts represent less than substantial harm, which would be outweighed by the benefits of the Scheme. Paragraph 7.1.11 of the Planning Statement Part 1 [APP-261] concludes that <i>"As described in Section 6 and Appendix B of this Planning Statement, whilst it has not been possible to avoid all impacts these have been minimised, where possible, through careful design and detailed mitigation strategies. When considered against the NPS and NPPF, the Scheme accords with relevant policies, and with regard to specific policy tests, the national and local benefits of the Scheme are considered on balance to outweigh its adverse impacts. The Scheme is also considered to be broadly consistent with relevant local planning policy. Therefore, it is considered that development consent for the Scheme should be granted."</i>
WSC-2	Landscape and Visual Amenity	Landscape and Visual Amenity	The scale, longevity and geographical distribution of the proposed development are likely to result in significant adverse impacts as a result of intra-cumulative and accumulated effects. We are concerned that, due to the way evidence is presented, and cumulative impacts are	The Landscape and Visual Impact Assessment (LVIA) set out in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] summarises the effects on the landscape in detail, from the national scale, through regional, county, district and neighbourhood scales to local landscape character areas defined by the Applicant. There is also specific assessment of intra-project combined effects within the chapter.

			considered, the ES assessment tends to under-estimate impacts.	It is acknowledged that there will be broad-scale change to the character of the landscape at the site level and within parts of the Rolling Estate Chalklands landscape character type (LT) defined within the Suffolk Landscape Character Assessment 2010 in Appendix 10D of the Environmental Statement [APP-103]. Effects on the landscape as a resource in its own right and effects on people's views of the landscape have been considered separately in line with best practice. Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] and associated appendices provide a detailed assessment of landscape and visual effects on each receptor in relation to each site within the Scheme and also the Scheme as a whole. This allows distinctions to be drawn between the impacts which would arise from separate parts of the Scheme and intra-project effects which would arise from the Scheme as a whole. This approach provides an assessment of landscape effects at different scales and on sequential views from roads and public rights of way, which have been assessed with reference to representative viewpoints. Mitigation, including offsets and planting, has been proposed to address and minimise adverse effects on the character of the landscape and views of the landscape. This is in line with the agreed methodology and the proportional approach advocated by the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition. Regarding the longevity of impacts, as noted in paragraph 10.3.6 of Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042], the following terminology and durations have been used for the landscape and visual assessment:

				a. Short term durations are considered to be two years or less; b. medium term durations are considered to be between two and ten years; and c. long term durations are considered to be more than ten years. Paragraph 10.3.7 states that the Local Planning Authority (LPA) response to the Applicant's engagement (17/02/2020) noted these terms and durations were acceptable. To draw distinctions between the duration and permanence of effects, the following assessment years were considered: a. Scheme construction (winter); b. Scheme operation year 1 (earliest 2025), (winter); c. Scheme operation year 15 (earliest 2040), (summer); and d. Scheme decommissioning (earliest 2065), (summer). This is in line with the methodology set out in Appendix 10C of the Environmental Statement [APP-102] and the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition (paragraph 3.22). Effects on some receptors would be significant at construction and year 1 of operation, reducing in the most part to not significant at year 15 of operation. Residual significant effects are predicted for some landscape receptors at year 15 of operation, particularly relating to intra project effects, as set out in Appendix 10G of the Environmental Statement [APP-106]. The Scheme has been designed to retain the existing landscape pattern and features as far as possible and effects on landscape character will be localised. Whilst it is acknowledged that some key characteristics, such as openness, will change, the majority of key characteristics will be retained. For example, within the Rolling Estate

				Chalklands LT, the large uniform fields enclosed by low hawthorn hedges and shelter belt planting will be retained and the clustered villages with flint and thatch vernacular houses and many new large "prestige" homes in villages will not be altered.
WSC-3	Ecology and Nature Conservation	Ecology and Nature Conservation	For this type of project it should be possible for the applicant to avoid the most sensitive habitats, deliver appropriate mitigation and compensation as well as ecological enhancement.	The Scheme has sought to avoid impacts on important habitats and species, where possible. For example, the Scheme has retained all areas of broad-leaved semi-natural woodland, semi-improved calcareous grassland and standing water (ponds and lakes). As such, the Scheme minimises impacts on receptors, including roosting bats, Great Crested Newt, reptiles and breeding and wintering birds. With reference to Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040], protected species identified as part of the detailed baseline surveys are reported in Tables 8-7 and 8-8, with an assessment of likely impacts and effects undertaken in section 8.9. Where required, the Scheme has delivered appropriate mitigation. Paragraphs 8.8.17-8.8.23 and 8.8.28 set out avoidance and mitigation measures for protected and notable species. The Biodiversity Net Gain Assessment [APP-259], using Defra's Biodiversity Metric 3.0, concludes that the Scheme will result in a substantial expected biodiversity net gain of approximately 83% gain of habitat units, approximately 16% gain in hedgerow units and approximately 1% gain of river units.
WSC-4	Transport and Access	Transport and Access	The submitted material is not considered to be acceptable by SCC as local highway authority and there are deficiencies in the highway-related provisions.	Please refer to the Applicant's responses to SCC's comments on Chapter 13: Transport and Access of the Environmental Statement [APP-045] and Transport Assessment [APP-117] .
WSC-5	Environmental Impact	Community impact	A project of the scale and nature proposed will radically change the sense of place, the place attachment of the residents, and the recreational amenities of the affected villages and communities, over a long period of time. The ES does	The Environmental Impact Assessment is regulatory compliant and has assessed the impacts on receptors using best practice, relevant guidance and legislation. Mitigation has been put in place where significant effects have been identified.

			not recognise this, and the corresponding need to mitigate/compensate for these impacts.	Landscape character assessment is a recognised technique for describing the physical aspects of the landscape and how it is experienced, helping to explain what gives a locality its sense of place. A comprehensive landscape character assessment was conducted by the Applicant, and this forms the baseline against which the assessment of landscape effects reported in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] has been made. Impacts over time on people's views and visual amenity, including users of recreational routes across the landscape have also been considered as part of the assessment of Landscape and Visual Amenity. The landscape within the study area for the LVIA is the product of centuries of human influence. It is predominantly an intensive agricultural landscape, interspersed with small settlements and other land uses. The horse breeding and racing industry has exerted an influence on the character of the landscape, particularly in the south, where stables, gallops and studs associated with Newmarket are located. The LVIA summarised in Chapter 10 of the Environmental Statement [APP-042] has assessed the potential impacts on the landscape at scales ranging from national to local, using evidence from published landscape character assessments and LLCA defined by the Applicant. It also includes a separate assessment of the impacts of each Site within the Scheme and an assessment of intra-project effects where relevant. This enables distinctions to be drawn regarding the geographical scale of likely significant effects in line with best practice. The assessment identifies that significant intra-project residual effects of operation on the landscape would be focussed within the LT Rolling Estate Chalklands defined in the Suffolk Landscape Character Assessment.

				The LVIA has concluded that there would be few locations where more than one part of the Scheme would be visible. However, there are some roads and public rights of way which either pass through or adjacent to the Sites where there would be sequential views of the Scheme. Representative viewpoints have been used within the assessment to illustrate the nature of views for different visual receptors and how the effects of the Scheme would differ along such routes. The management of existing vegetation and the establishment of proposed planting is predicted to reduce most visual effects to not significant by year 15 of operation. The only visual receptors predicted to experience significant residual effects in year 15 of operation are people visiting the Limekilns Gallops, including members of the Jockey Club and members of the public who informally view the horses between breaks in the roadside vegetation. These receptors are represented by Viewpoint 38. The evolution of the Scheme from its inception to the outline design is outlined in the Design and Access Statement [APP-264]. Landscape architects have strongly influenced the design, informed by emerging findings from the LVIA and guided by the criteria for good design outlined in the relevant National Policy Statements. In summary, the following design changes have been made to refine and improve the Scheme to minimise its impact on settlements and their landscape setting and people's use and views across the landscape: • Scaling back the area of land required for the Scheme - this has been reduced by 189ha since the Scheme's inception to address the concerns of scale and as a result of landowner discussions. • The landscape and ecological design proposed has been refined to provide over 30% of the area of the Sites as green infrastructure, utilising existing landscape and ecological features and habitats, and

				providing mitigation for landscape and visual impacts and impacts on ecological species of the Scheme. • The design of the proposed Green Infrastructure has been refined to reduce the visual impact of the Scheme in relation to nearby settlements by providing screening, offsets and buffer zones. • The inclusion and subsequent refinement of proposed permissive routes to provide linkages across the Sites and between settlements away from busy roads. • Careful siting of the solar panel arrays and other infrastructure in relation to landscape character, landform and vegetation. Particular consideration has been given to the relationship with settlements, including the siting of the solar panels to avoid the Scheme resulting in physical coalescence. Substantial offsets from Freckenham, Isleham and Worlington have been integrated into the design. Offsets from local roads have also been included, such as to the west of Beck Road and Freckenham Road, to retain views along the road corridor of the churches in Isleham and Freckenham and a perception of travelling through the landscape that separates the settlements. It is acknowledged that there will be adverse residual landscape effects at the scale of the Rolling Estate Chalklands LT defined in the Suffolk Landscape Character Assessment. A finer grained assessment has determined that there would be variation in the extent of significant effects at the local level, focused within the Sites and some LLCAs defined by the Applicant. These effects would not be of such an extent that the Scheme would radically change the sense of place, the place attachment of the residents, and the recreational amenities of the affected villages and communities. The LVIA has not concluded that the Scheme would dominate and transform the local landscape to the extent that it would be altered beyond recognition. The

				mitigation proposed to address adverse effects of the Scheme is the product of an iterative process, informed by the LVIA over several years. Further planting would not further reduce the significance of the effects reported.
WSC-6	Environmental Impact	Cultural Heritage	Cultural Heritage Chapter of the Environmental Statement appears to be heavily focussed on archaeology and does not mention any historic building non-designated heritage assets outside the conservation areas.	The cultural heritage assessment assesses all elements of the historic environment, including archaeology, historic buildings and the historic landscape. Details of these are presented within the Desk-Based Assessments (Appendix 7C-E of the Environmental Statement [APP-059, APP-060 and APP-061]) and presented on Figure 7-1a-i of the Environmental Statement [APP-179]. This sets out the study areas for identifying heritage assets, including both designated and non-designated. In addition, Table 1.5 of Appendix 7B [APP-058] contains details of non-designated historic buildings. Paragraph 7.5.52 of Chapter 7: Cultural Heritage of the Environmental Statement [APP-039] states “The post-medieval period is most strongly represented in the 1km study area by built heritage, principally within the main settlements. The vast majority of historic building stock within the 1km study area rests within these settlements and belongs to this period.” There are limited non-designated built heritage assets outside of the settlements and conservation areas. Paragraph 7.7.2 of Chapter 7: Cultural Heritage of the Environmental Statement [APP-039] states “As such, only those assets which are considered to experience an impact from the Scheme, as informed by the DBA and professional judgement, are discussed. Those assets which will not experience an impact on their significance..., either physically or through changes to their setting, are omitted.” This is consistent with the proportionate approach advocated in NPS-EN1 (paragraph 5.8.8) and the NPPF (paragraph 194).

WSC-7	Environmental Impact	Cultural Heritage	Cultural Heritage - The description of the works as set out in the draft Development Consent Order [APP-019] is insufficiently detailed in order for an assessment to be made as to whether the proposals will affect the character and appearance of the conservation areas and the setting of listed buildings.	Paragraph 3.4.63 of Chapter 3: Scheme Description of the Environmental Statement [APP-035] states that the works required within Freckenham and Exning Conservation Areas comprise temporary removal of street furniture, and, for Freckenham, tree pruning. This is required to facilitate the crane access routes. The removal of street furniture is temporary, and will have no permanent impact on the character or appearance of the conservation areas. No other part of the Scheme is within a Conservation Area nor will it physically affect a listed building. Effects on the setting of conservation areas and listed buildings resulting from the works outlined in the draft Development Consent Order [APP-019] are presented in Chapter 7: Cultural Heritage of the Environmental Statement [APP-039] . No further text is required to be added to the DCO.
WSC-8	Ecology	Ecology and Nature Conservation	The Ecology and Nature Conservation chapter of the Environmental Statement [APP-040] is still lacking important detail. Specifically, inadequate characterisation of impacts and unjustified exclusion of ecological features from detailed assessment.	The characterisation of potential impacts on ecological features during construction, operation and decommissioning are presented in section 8.7 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040]. Ecological features taken forward for detailed assessment are based on the criteria set out in paragraphs 8.4.26-8.4.32 and 8.6.17 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040]. It is considered that the approach taken in these locations is adequate and acceptable.
WSC-9	Ecology	Biodiversity net-gain	There has been insufficient adherence to the Mitigation Hierarchy, including the avoidance of impacts on important habitats and species.	The Scheme has followed the mitigation hierarchy and sought to avoid impacts on important habitats and species, where possible. For example, the Scheme has retained all areas of broad-leaved semi-natural woodland, semi-improved calcareous grassland and standing water (ponds and lakes). As such, the Scheme minimises impacts and avoids significant effects on receptors including, roosting bats, Great Crested Newt, reptiles and breeding and wintering birds. With

				reference to Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] , important ecological features identified as part of the detailed baseline surveys are reported in Tables 8-4, 8-5, 8-6, 8-7 and 8-8. Section 8.8 sets out avoidance and mitigation measures for important ecological features, with an assessment of likely impacts and effects undertaken in section 8.9.
WSC-10	Ecology	Biodiversity net-gain	Habitat creation proposals are lacking in detail, including how they link to form a coherent nature network and their long-term management regimes.	Appendix 10I: Landscape and Ecology Management Plan of the Environmental Statement [APP-108] sets out the rationale for habitat creation, including how it forms a coherent nature network. For example, paragraph 1.7.29 sets out how the Scheme will align with and contribute to Buglife's B-Lines project, providing landscape scale benefits for pollinators through increased habitat provision and connectivity. Annex C sets out the indicative grass mixes to be sown across the Scheme and grazing regimes for management. Areas designated for conservation grazing have been incorporated to link in with the B-Lines project through allowing diverse grasslands to establish and be managed for the benefit of pollinators. Further detail on these measures and how habitat creation will link to form a coherent biodiversity network including their long term management will be set out in the detailed LEMP to be approved by WSC at the detailed design, post-consent stage.
WSC-11	Ecology	Biodiversity net-gain	Opportunities exist to provide enhancements and benefits, should the scheme be delivered, however these do not appear to have been fully explored beyond what is required to mitigate significant effects. In general, the proposals lack ambition.	Section 8.8 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] sets out the enhancements embedded into the Scheme design, with further detail provided in Appendix 10I, Landscape and Ecology Management Plan of the Environmental Statement [APP-108]. The Biodiversity Net Gain Assessment [APP-259], using Defra's Biodiversity Metric 3.0, concludes that the Scheme will result in approximately 83% gain of habitat units, approximately 16% gain in hedgerow units and approximately

				1 % gain of river units. By current government expectations, i.e., 10% net gain, this is an ambitious target.
WSC-12	Ecology	Biodiversity net-gain	The Biodiversity Net Gain Assessment (BNG) appears to indicate a considerable biodiversity net gain for 'area' habitats and 'hedgerows', but 'no net loss' for 'river' habitats. There are, however, inconsistencies in the reporting and insufficient detail to give confidence	The Biodiversity Net Gain Assessment [APP-259], using Defra's Biodiversity Metric 3.0, sets out the approach and evidence used in undertaking the calculations, along with adequate detail to interpret the results. The Council's comments will be taken into consideration as part of an updated calculation of BNG which will provide the detail as requested for the calculations using the latest BNG metric, 3.1. This will be provided during the Examination process. Putting these changes into perspective, it is expected the current calculation of a net gain of about 83% habitat units, 16% hedgerow units and 1% of river units will not change significantly.
WSC-13	Ecology	Habitats Regulations Assessment	There is a lack of evidence in the public domain to ascertain whether stone curlew avoid nesting or foraging near solar panels.	This comment is noted. However, the areas embedded within the Scheme design for Stone Curlew habitat have been located in contiguous blocks of land, so they are clearly demarcated and separated from areas of PV arrays.
WSC-14	Decommissioning	Biodiversity	There is a lack of information on the long-term survival (i.e. beyond 40 years) of the newly created habitats.	The Framework Decommissioning Environmental Management Plan [APP-125] sets out that all biodiversity enhancements will remain on completion of decommissioning and only the infrastructure elements of the Scheme would be removed. Any disturbance to habitats during decommissioning will be subject to appropriate mitigation. After decommissioning has been completed the Scheme will have ended and the DCO (if granted) would cease to have effect. Habitats and species present at the site on completion of decommissioning would be subject to relevant laws and regulations. Paragraph 4.10.3 of NPS EN-1 and Paragraph 4.11.5 of Draft NPS EN-1 set out that the decision maker "...should work on the assumption that the relevant pollution control regime and other environmental regulatory regimes, including those on land drainage, water abstraction and biodiversity, will be properly applied and enforced by the

				<i>relevant regulator... ...[and] should act to complement but not seek to duplicate them."</i>
WSC-15	Ecology	Other	WSC will expect, as a minimum, for the applicant to make additional amendments to the design to further avoid or reduce impacts on important habitats and species, and to adequately mitigate or compensate where impacts are unavoidable. The applicant should also be prepared to work up future management prescriptions and monitoring of the habitat creation to provide clarity and real benefits to biodiversity.	As identified in response to WSC-9, the Scheme has followed the mitigation hierarchy and sought to avoid impacts to important ecological features, where possible. With reference to Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040], important ecological features identified as part of the detailed baseline surveys are reported in Tables 8-4, 8-5, 8-6, 8-7 and 8-8. Section 8.8 sets out avoidance and mitigation measures for important ecological features, with an assessment of likely impacts and effects undertaken in section 8.9. The framework for management and monitoring of created habitats is outlined in Appendix 10I, Landscape and Ecology Management Plan of the Environmental Statement [APP-108]. The Landscape and Ecology Management Plan is outline and is intended to be further developed post-consent. Paragraph 1.1.4 states that <i>"this OLEMP provides a framework for achieving the 'vision' of the Landscaping Masterplan, as illustrated on Figures 1 to 6, in Annex A. Detailed landscaping and ecological management plans will be approved by the relevant local planning authority and will be required to be in accordance with this OLEMP"</i>.
WSC-16	Landscape and Visual Amenity	Assessment of adverse impacts	There remain concerns about the legibility and presentation of the landscape and visual impact assessment including the visualisations.	The visualisations for the Scheme have been prepared in line with best practice, including Landscape Institute Technical Guide Note 06/19 and the methodology setting out the approach is provided in Appendix 10C: Landscape and Visual Impact Assessment Methodology of the Environmental Statement [APP-102] . Judgements made in relation to likely visual effects of the Scheme have been considered in detail and made with reference to the methodology and minimised through the iterative design process.

WSC-17	Transport and Access	Assessment of adverse impacts	Elements of the scheme, such as road improvements, have not been included in the Landscape and Visual Impact Assessment (LVIA) [APP-042] and could potentially result in adverse effects such as urbanisation and loss of vegetation in the rural landscape.	All aspects of the Scheme relevant to landscape and visual effects have been considered in the Landscape and Visual Impact Assessment summarised in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042]. This includes the mitigation for other topics set out in the Schedule of Environmental Mitigation [APP-257]. Road improvements proposed are minor and localised and have been designed to minimise landscape and visual impacts, informed by the landscape and visual impact assessment and in line with the principles set out in the Design and Access Statement [APP-264].
WSC-18	Landscape and Visual Amenity	Assessment of adverse impacts	The lack of detail (for example, incomplete information on the sites landscape features that are being relied on, the quantification of vegetation losses and the consideration of required visibility splays at access points and their impact on roadside trees and hedges) does not promote a full and clear understanding of the landscape and visual effects of the proposals.	The Application documents provide sufficient detail to make full and clear judgements on the likely landscape and visual effects of the Scheme. The spatial arrangement of various components of infrastructure in each parcel is shown on the Parameter Plans in Figure 3-1 of the Environmental Statement for Sunnica East [APP-135] and Figure 3-2 of the Environmental Statement for Sunnica West [APP-136]. These should be read alongside other Figures in the Application, which provide details on the design and arrangement of individual elements [APP-137 to APP-161]. The Biodiversity Net Gain Assessment [APP-259] and the Tree Constraints Report [APP-101] provide information on changes in existing habitats as a consequence of the Scheme. See comment WSC-47 for details regarding consideration of the visibility splays for the site accesses and also the Framework Construction Traffic Management Plan [APP-123] and the Traffic Regulation Measures Plans [APP-009 – APP-013] which set out the proposed access strategy for the site accesses.

WSC-19	Landscape and Visual Amenity	Assessment of adverse impacts	In-combination effects with other projects and proposals do not appear to have been adequately considered, for example it is not clear why some cumulative schemes have been omitted from assessment at stage 3 & 4 in ES section 10.11.	The assessment of cumulative landscape and visual effects is set out in Section 10 of Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042]. It is based on the 'combined' impacts and effects of the Scheme with the cumulative schemes set out in Appendix 5A of the Environmental Statement [APP-055] and is separate from the assessment of the landscape and visual effects of the Scheme in isolation. This is common practice to draw clear distinctions. Only those cumulative developments considered to have the potential to result in cumulative landscape and visual effects at the time were included in the assessment. Regarding North Angle Solar Farm (CCC/20/051/FUL and CCC/21/237/VAR), this scheme lies to the west of Soham and outside of the study area defined for the Landscape and Visual Impact Assessment (LVIA). It was therefore scoped out of the assessment of likely cumulative landscape and visual effects presented in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042]. An assessment of the cumulative effects of the proposed Breach Solar Farm (21/00706/ESF) has now been made and is included in Appendix A of this Relevant Representations response document. It concludes that there would be moderate adverse cumulative effects on LLCA 36: Burwell Fen during construction, which are considered significant. These effects would be short term and temporary. Effects during operation and decommissioning would be not significant.
WSC-20	Decommissioning	Duration of adverse impacts	WSC considers that the proposed lifespan of the project, of 40 years, and the consequent accumulation of adverse effects, is not reasonable and appropriate, notwithstanding the need to deliver Net Zero by 2050, and decarbonise the Grid by 2035.	Paragraph 2.49.9 of draft NPS EN-3 acknowledges that the design life of solar panels can sometimes be longer than 30 years. Chapter 3: Scheme Description, of the Environmental Statement [APP-035] sets out at paragraph 3.2.4 c that the operational life of the Scheme is 40 years. As set out by paragraph 6.3.23 of Chapter 6: Climate Change of the Environmental Statement [APP-038] , an indicative solar PV module type has been considered, which would have a

				warranty covering the first 30 years. The paragraph goes on to explain that PV panel degradation over time (from 0-40 years) has also been factored into calculations for the performance of the Solar PV modules in assessing the climate change impact of the Scheme. The lifecycle GHG Impact Assessment presented in Chapter 6: Climate Change of the Environmental Statement [APP-038] assesses the scheme's GHG impact in the context of the UK's carbon budgets and the UK Government's ability to meet its net zero carbon target. While there will likely be some emissions as a result of the Scheme after 2050 and beyond (e.g., from decommissioning activities), some emissions will be permitted beyond 2050 while still complying with the net zero target. Such residual emissions will need to be offset or removed. Given the important role the Scheme has to play to enable the UK to achieve net zero through renewable energy generation, and given the favourable comparison to other energy generation options, the Scheme is considered to have a major beneficial effect on the climate overall. It should also be noted that the emissions presented in Chapter 6: Climate Change of the Environmental Statement [APP-038] have been calculated as a reasonable worst case, particularly those associated with decommissioning, as these calculations do not fully account for expected decarbonisation of decommissioning activities in the future. The Scheme has been assessed to have a major beneficial effect on the climate. The overall beneficial impact of the Scheme is considered to offset any greenhouse gas emissions during the Scheme's lifetime.

WSC-21	Landscape and Visual Amenity	Mitigation of adverse impacts	As the mitigation must be appropriate to the local landscape character, it may not be possible to screen the solar panels from all visual receptors. For these areas, positive place making is required and the applicant needs to provide innovative design solutions, which demonstrate that, although the panel arrays may be visible, they sit well within the landscape, are not dominant or too prominent, and do not detract significantly from it	The Landscape and Visual Impact Assessment presented in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] , read alongside the visual baseline presented in Appendix 10F of the Environmental Statement [APP-105] and the detailed assessment of visual effects presented in Appendix 10H of the Environmental Statement [APP-107] , identifies locations where there would be views of solar panels and other structures. The aim of the landscape design and mitigation has been to retain the legibility of the landscape and to avoid (i.e., reduce to zero) or otherwise minimise adverse impacts on its character and views of the landscape. This has been achieved where possible by offsetting development from settlement boundaries, roads and public rights of way, retaining existing vegetation within and on the boundaries of the site and reinforcing the Green Infrastructure through additional planting which reflects the character of the landscape, as shown in the Landscape Masterplans presented in Figures 10 – 14a to 10-14f [APP-209 to APP-214] . This means that, even where solar panel arrays are visible, they will generally be at a distance from the viewer and in the context of retained vegetation and proposed planting, minimising the scale of impacts. The vision and design principles for the landscape design are set out in the Landscape and Ecology Management Plan [APP-108] and the Design and Access Statement [APP-264] . Visual materials, including the photomontages, are presented in Figures 10-20a to 10-102 of the Environmental Statement [APP-215 to APP-232] . The mitigation proposed is adequate and justified by the conclusions of the LVIA.
WSC-22	Landscape and Visual Amenity / Ecology	Mitigation of adverse impacts	The requirements to make the proposals acceptable in landscape terms, will need to be integrated with the requirements to also mitigate for ecology, cultural heritage, and public access impacts.	The Landscape and Ecology Management Plan [APP-108] has been prepared jointly with inputs from landscape, ecology and cultural heritage. The outline document ensures that all mitigation design is acceptable with regard to potential impacts on these disciplines. This includes the avoidance of sensitive areas, including the scheduled round barrows at Chippenham and design which enhances the significance of

				the Registered Park and Garden at Chippenham Park, designated sites for biodiversity and protected and notable species and habitats. The visual impact on users of the PRoW has been assessed and is documented within the Landscape and Visual Impact Assessment presented in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042]. The residual effect on these recreational users is not considered to be significant. There are eight PRoWs which are required to be temporarily closed for a short-term period during the construction phase. The closures are expected to be for a maximum of three weeks, which is expected to be a worst-case scenario. Each of the short-term temporary closure of the PRoWs will occur at different stages therefore each will be impacted on separately at differing stages of the construction. The PRoW closures are discussed and outlined in the Framework Construction Traffic Management Plan and Travel Plan [APP-118] and in the Traffic Regulation Measures Plans – Temporary Road Closures plans [APP-009, APP-010, APP-011].
WSC-23	Landscape and Visual Amenity	Mitigation of adverse impacts	A key component in the success or otherwise of the project's Green Infrastructure (GI) will be effective management, in the short and long term, and this should be part of the LEMP vision.	The Landscape and Ecology Management Plan [APP-108] submitted with the application sets out the framework for the management and maintenance of existing and proposed Green Infrastructure within the Scheme. This addresses each landscape element type separately, setting out the initial maintenance that will be carried out to establish new habitats and long-term management of existing and proposed vegetation. The vision and principles for the proposed Green Infrastructure are set out in the Landscape and Ecology Management Plan [APP-108]. All landscape enhancements will remain in situ after decommissioning and only the infrastructure elements of the Scheme would be removed, as set out in the Framework Decommissioning Environmental Management Plan [APP-125]. If after decommissioning a

				landowner decides to remove vegetation, this would be subject to applicable planning or licensing requirements at the time.
WSC-24	Landscape and Visual Amenity	Mitigation of adverse impacts	Landscape proposals should be tailored to the location and conditions of each site, noting that these change across the DCO site. Therefore, specific management prescriptions will be required. The current proposals (including detail in the Framework LEMP) do not necessarily facilitate this approach.	As stated in paragraph 1.3.2 of the Landscape and Ecology Management Plan [APP-108] , the Plan has been developed to ensure that the Scheme would reflect the existing landscape character and context, whilst accommodating mitigation principles established within the Environmental Statement. This has been a key consideration throughout the iterative assessment and design process and is linked to the review of published landscape character assessments and the definition of local landscape character areas (LLCA) by the Applicant, as set out in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] . The Landscape and Ecology Management Plan is outline and is intended to be further developed post-consent. Paragraph 1.1.4 states that <i>"this OLEMP provides a framework for achieving the 'vision' of the Landscaping Masterplan, as illustrated on Figures 1 to 6, in Annex A. Detailed landscaping and ecological management plans will be approved by the relevant local planning authority and will be required to be in accordance with this OLEMP"</i> . The Applicant will continue to engage with WSC to understand their specific concerns and collaborate to agree proposed solutions.
WSC-25	Landscape and Visual Amenity	General	Notwithstanding the overall concerns about the scale and duration of the development, WSC expects the applicant, as a minimum, to address the main areas of concern as expressed and work with the local authorities to reduce the impacts on the character of the landscape and on the most sensitive receptors by redesigning elements of the scheme.	Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] and associated appendices [APP-100 to APP-108] provide a thorough and detailed assessment of the likely effects of the Scheme on landscape and visual receptors. These documents set out the key areas of impact and related mitigation. The Landscape and Visual Impact Assessment (LVIA) and the design of the Scheme was carried out in consideration of comments made in the Scoping Opinion and in meetings between the Applicant and relevant local planning authorities during the pre-application period. The Applicant will continue to engage with WSC to understand their specific concerns and collaborate to agree proposed solutions.

WSC-26	Construction	Construction noise	In the main, WSC accept the methodology and references to legislation, current guidance and British Standards used in the submission documents, to quantify construction and operational noise. However, there are several observations from the perspective of the West Suffolk Private Sector Housing and Environmental Health (PSH&EH) team.	This comment is noted.
WSC-27	Human health	Noise and Vibration	In addition, there are residential properties that have not been assessed for background and ambient levels which are likely to be particularly affected. Property at Lee Farm is encircled by Sunnica East A and Bridge End Road, Red Lodge is close to the proposed staff car park, construction compound, HGV access and BESS at Sunnica East B.	Figure 11-4 of the Environmental Statement [APP-236] shows operational noise contours. Noise predictions from this figure indicate that Lee Farm will experience operational noise levels of approximately 40 dB $L_{Aeq,T}$. The lowest measured daytime $L_{A90,15min}$ at all measurement locations was 36 dB. Taking a conservative approach and applying this measured level to Lee Farm would result in a Minor Adverse effect which is not significant. The lowest measured night-time $L_{A90,15min}$ of 29 dB would result in a significant Major Adverse effect. However, context should be applied through the assumption that residents will be inside their property at night and experience some protection from noise by the building envelope. A building envelope with a partially open window is generally accepted to attenuate noise by at least 10dB. BS 8233:2014 provides guidance levels for internal noise within bedrooms of 30 dB $L_{Aeq,T}$ during the night-time. The predicted internal noise level is, at highest, 30 dB $L_{Ar,Tr}$. This absolute noise level is considered not to be of sufficient magnitude to warrant a significant noise effect. Consequently, night-time noise at Lee Farm is considered to be Minor Adverse and not significant. Predictions at Bridge End Road, Red Lodge indicate operational noise of between 35-40 dB $L_{Aeq,T}$. Noise data from LT5 is considered suitably representative of this location. Operational noise predictions are below the

				measured background Noise level of 54 dB $L_{A90,15min}$ for the daytime and 40 dB $L_{A90,15min}$ for the night-time. Consequently, operational noise effects at this receptor are Negligible and not significant. Construction noise may cause disturbance; however, due to the scale of the site and the mobile nature of works, disturbance is only likely to occur for short periods of time. Best practicable means will be adopted to reduce noise impacts as far as reasonably practicable. Additionally, residents of properties near the site will be given prior warning of the timings and duration of construction works. Prior warning of works can make people more tolerant of higher levels of noise for short periods of time.
WSC-28	Noise and Vibration	Insufficient data	It is recommended that monitoring procedures be adopted within the detailed CEMPs [APP-123] (and any Control of Pollution Act 1974 s.61).	Requirements including monitoring locations and noise monitoring methods and frequency to be employed will be determined by the contractor and agreed pursuant to the section 61 (or any replacement statutory scheme) process. The approach is detailed in the Framework CEMP [APP-123] .
WSC-29	Noise and Vibration	Insufficient data	Insufficient data is provided regarding the sound levels of the proposed inverters, transformers, and battery units. Clarification is required on sound power of the transformers and whether the noise levels being quoted are for externally sited transformers or internal ones housed in solar stations with associated cooling units.	Details on sound power data used in the assessment are provided in Appendix 11E [APP-114] . Inverters have a sound power level of 90 dB(A) and transformers have a sound power level of 74 dB(A). These plant were modelled in solar stations, which is considered a worst-case approach. Battery units have a sound power level of 83 dB(A). The placement of air conditioning units in relation to the BESS were modelled on the outside of BESS units to present a worst-case scenario.
WSC-30	Noise and Vibration / Human health	Insufficient data	Low frequency hum from any of the proposed fixed plant should be considered. No data has been supplied to provide confidence that low frequency hum will not be an issue at any residential properties in the West Suffolk area.	Plant will be selected and designed to minimise any tonal components. Residual operational noise effects at receptors within Table 11-20 of Chapter 11: Noise and Vibration of the Environmental Statement [APP-044] shows that operational noise levels are not assessed as significant. Low frequency noise complaints tend to originate from people who have a

				high sensitivity to low frequency noise. However, as no significant effects are identified and noise predictions indicate low absolute levels of noise at receptors, complaints are considered unlikely. Pursuant to the Framework Operation Environmental Management Plan [APP-126], the Operation Environmental Management Plan to be approved by WSC will include information on how the scheme design and operational plant levels have been developed to mitigate and reduce effects to a minimum. This will include consideration of sound output levels, the noise from inverters and cooling fans during lower modes of operation and positioning of plant.
WSC-31	Noise and Vibration	Insufficient data	The assumptions made for the generation of the construction and operational noise models require further exploration and assessment.	Details on construction noise modelling are provided in Appendix 11D of the Environmental Statement [APP-112] and in Appendix 11E of the Environmental Statement [App-113] for operational noise modelling. Section 11.3 of Chapter 11: Noise and Vibration of the Environmental Statement [APP-044] contains assumptions for construction and operational noise modelling. Construction noise predictions were undertaken using the calculation methodology set out in BS5228-1, which is considered appropriate for a Scheme of this nature. Plant used in the construction process were referenced from Chapter 3: Scheme Description of the Environmental Statement [APP-035]. Assumptions were made about the percentage on-time for each item of plant and an estimation was made on the level of noise reduction from embedded mitigation (based on Table B.1 of BS 5228-1). Construction noise predictions were undertaken with plant operating at the nearest site boundary to each sensitive receptor to provide a worst-case assessment. Operation noise predictions were undertaken using International Standards Organization (Part 1: 1993, Part 2: 1996). The site layout modelled based on details in Chapter 3: Scheme Description of the Environmental Statement

				[APP-035] . Sound power data for plant is based on manufacturer's data. Option 1 for the Burwell Substation Extension was modelled as it is closer to sensitive receptors than Option 2 and represents a worst-case.
WSC-32	Noise and Vibration	Noise modelling	Clarification is also required that noise modelling at the construction stage has taken into account the combined effects of both construction traffic and plant noise where these sources are co-located.	Section 11.8 of Chapter 11: Noise and Vibration of the Environmental Statement [APP-044] contains assessments of construction noise and construction traffic noise. The assessment of on-site construction noise emissions considers on-site plant noise activity, which includes a contribution from trucks.
WSC-33	Noise and Vibration		Any exceptions to the agreed construction hours (for example, for exceptional deliveries, large vehicle movements planned to avoid traffic etc.) would need to be accompanied by specific noise mitigation measures that should be set out in the CEMP together with justification of why the activity needs to be undertaken outside the agreed working hours.	Any works that are required outside of agreed construction hours will be approved through the Section 61 process, which will allow additional mitigation measures to be identified if required. The approach is detailed in the Framework CEMP [APP-123] .
WSC-34	Noise and Vibration / Construction Environmental Management Plan		It will be necessary for the continual assessment of impact on the amenity of residents, for onsite monitoring to continue for the duration of activity on the site.	As no significant noise effects are identified in the assessment of operation noise, no noise monitoring is proposed for the operational phase.
WSC-35	Construction	Burning of waste	There appears to be contradictory information regarding the burning of waste on site. Confirmation will be required that there will be no burning of waste during any phase of the development.	The Applicant confirms that there will be no burning of waste on site during any phase of the development.
WSC-36	Environmental Impact	Noise and Vibration / Construction Environmental Management Plan	It is likely the DCO will contain a requirement that "exempts" the developer from action under Section 79 of the Environmental Protection Act 1990 (Statutory Nuisance), as is usual in these cases. However, due to the nature, West	The Framework Construction Environmental Management Plan [APP-123] provides in table 3-6 for the monitoring of noise complaints, keeping of a logbook and reporting for immediate remedial action and, in Table 3-9, for air quality monitoring requirements.

			Suffolk Council Sunnica Energy Farm Relevant Representation 12 size and duration of this development it is likely to cause complaint and there is an expectation that there will be cooperation with WSC's PSH&EH Team in finding a resolution where complaints are received and found to have merit.	It also states that the Applicant will seek a section 61 consent for construction activities, where, if WSC requires further steps to be taken, this can be agreed. This could alternatively also be considered in the approval process for the detailed CEMP, pursuant to Requirement 14 of the draft DCO [APP-019] .
WSC-37	Land Use	Agricultural land and soils	WSC is aware of concerns within the community as to the reliability of the soil survey data and that access cannot be obtained to the land to verify the findings. The Examining Authority's attention is therefore drawn to this point and as such this matter may require further scrutiny.	The Applicant has submitted a detailed ALC assessment [APP-238] [APP-239] that follows the recommendations given by Natural England in TIN049. This assessment includes work by two previous survey teams, one for the consented minerals site and work by the former MAFF ALC survey team. Natural England provide ALC expertise to planning authorities. The National Policy Statement for Energy EN-1 para 5.10.15 states <i>"The [Secretary of State] should ensure that applicants do not site their scheme on the best and most versatile agricultural land without justification. It should give little weight to the loss of poorer quality agricultural land (in grades 3b, 4 and 5), except in areas (such as uplands) where particular agricultural practices may themselves contribute to the quality and character of the environment or the local economy."</i> Para 5.10.8 states <i>"Applicants should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5) except where this would be inconsistent with other sustainability considerations."</i> In addition, NPS EN-1 paragraph 5.10.15 states that the decision maker <i>"...should give little weight to the loss of poorer quality agricultural land (in grades 3b, 4 and 5)..."</i>. This is reaffirmed by paragraph 5.11.14 of draft NPS EN-1

				which preserves the existing guidance of EN-1 para 5.10.15 as given above. Draft NPS EN-3 para 2.48.13 also recommends that ground mounted solar should avoid the best and most versatile cropland where possible, but also concludes <i>“However, land type should not be a predominating factor in determining the suitability of the site location.”</i> ALC assessment work for the Sunnica site has been undertaken in accordance with the available guidance by suitably qualified experts. This assessment work shows that the site is predominantly in ALC Grades 3b and 4, with only a marginal area (less than 4%) of Grade 3a land, the lowest quality of agricultural land considered to be Best and Most Versatile. This Grade 3a land resource will not be lost as the development consent is temporary, with land continuing in agricultural use through the operational period of the development. With only a marginal extent of best and most versatile land the selection of the site has minimised the use of best and most versatile land. This use of a small area of Grade 3a land should be considered against other sustainability considerations such as the need to rapidly displace fossil fuel use. West Suffolk Council does not need in house expertise on ALC as it can draw upon the technical expertise provided by Natural England. In the absence of any concern from Natural England regarding the ALC assessment, West Suffolk Council should note the above National Policy Statement guidance and give little weight to the loss of poorer quality agricultural land.
WSC-38	Land use	Agricultural land and soils	Until such time as the strategic question of whether large areas of productive agricultural land should be used for solar	The Applicant agrees that solar generation on rooftops should continue to be progressed in the UK but not instead of large-scale ground-mounted schemes such as Sunnica Energy Farm. This is because rooftop solar will not deliver

			power generation, as opposed to focussing solar generation on rooftop.	the scale or speed of deployment required to meet the urgent need for low-carbon generation to decarbonise the UK's electricity supply. Overarching National Policy Statement for Energy EN-1 (2011) is the basis for the arguments set out in the Applicant's Statement of Need [APP-262], and section 7.5 of that statement describes the complementary, not substitutional, roles of decentralised (smaller-scale) and centralised (larger-scale) generation in UK decarbonisation. Government's position, as set out in EN-1 (2011) is that <i>"Government does not believe that decentralised and community energy systems are likely to lead to significant replacement of large-scale infrastructure. Interconnection of large-scale, centralised electricity generating facilities via a high voltage transmission system enables the pooling of both generation and demand, which in turn offers several economic and other benefits, such as more efficient bulk transfer of power and enabling surplus generation capacity in one area to be used to cover shortfalls elsewhere. [3, Para 3.3.29]"</i>.
WSC-39	Land use	Agricultural land and soils	The Applicant has failed to assess the soils and agricultural land quality of the cable route, in direct contravention of draft EN-3, which states that soil surveys should be extended to the underground cabling and access routes (2.48.14).	The Sunnica ALC assessment work predates the draft recommendation in EN-3 that soil surveys should be extended to underground cabling routes. The Applicant does propose a soil assessment along the cable route as part of the soil management plan for construction and decommissioning. This will be required by the Construction Environmental Management Plan and Decommissioning Environmental Management Plan which is secured by requirement 14 and 22 of the draft DCO [APP-019]. As the cable route is narrow, this will be a soil assessment appropriate to the cabling works as opposed to detailed ALC survey that typically places sample points on a 100m grid.

				In addition, it is noted that land within the cable route will only be taken out of agricultural production for a short period of time whilst cables are installed and returned to agriculture on completion of cable laying in that area. See paragraph 12.4.11 of Chapter 12: Socio-economics and Land Use of the Environmental Statement [APP-044] .
WSC-40	Planning	Local Development Plan Allocations	Table 2-3 in the Planning Statement Part 1 [APP-261] lists the relevant adopted local development plan allocations and safeguarded areas within and close to the Order limits. Allocation SA10(a) Land north of Acorn Way (referred to in Chapter 12 Socio-Economics and Land Use, Table 12-19) is omitted from table 2-3, which is assumed to be an error that needs rectifying as the site falls within 1km of the Order limits	Paragraph 2.6.14 of Planning Statement Part 1 [APP-261] explains that “<i>Table 2-3 list the adopted development plan allocations and safeguarded areas within and close to Order limits</i>”. These are illustrated on Figure 2-11, within Planning Statement Part 3 [APP-263]. The Planning Statement does not purport to show all allocations with 1 km of the Order limits. Allocation SA10(a) Land north of Acorn Way is more than 500 m from the Order limits at its closest point. This is noticeably further from the Order limits than any of the allocations that are included in Table 2-3 and shown on Figure 2-11. Noting the distance from the Scheme and location on the opposite side of the A11 no land use planning conflict with the Scheme has been identified for allocation SA10(a) Land north of Acorn Way. Notwithstanding the above, the Applicant has prepared Figure 2-11A to show the allocation for illustrative purposes. This is included alongside these Relevant Representations.
WSC-41	Planning	Emerging Local Plan	The employment site (ref WSE04) included in the West Suffolk Regulation 18 Issues and Options local plan 9 is noted in table 2-3 of the Planning Statement [APP-261] as a safeguarded area close to the Order limits. This site lies directly to the southeast of Sunnica East Site B and it is therefore requested that ongoing dialogue is maintained on the basis this site is a potential area of employment for	The Applicant notes that since the Relevant Representation was issued, the West Suffolk Local Plan (Regulation 18) Preferred Options has been published for consultation by WSC. Appendix B to Part Three of this confirms that allocation WSE04 is not being progressed by WSC and that the reason for its omission is: “ <i>The site is considered an unsustainable location. The employment land review study does not support this scale of economic growth and directs strategic allocations to be identified in the towns first.</i> ”

			consideration through the preparation of the West Suffolk local plan.	The Applicant therefore considers that further discussion of this matter is not required.
WSC-42	Planning	Emerging Local Plan	The joint statutory consultation response prepared by the four host authorities (December 2020) raised concerns that insufficient consideration had been given to West Suffolk's longer term growth aspirations. "The Applicant has not identified any allocation or safeguarded land within an adopted Development Plan document, nor any development consent order or planning application/permission either granted in progress for any of the above schemes. As such, it is considered that these are at too early a stage to be relevant to the decision on this Application and are therefore not considered further by this Planning Statement."	The quotation is from paragraph 2.6.16 of the Planning Statement Part 1 [APP-261]. The quoted text specifically refers to the four specific aspirational improvements to the strategic transport network that are listed in paragraph 2.6.15 of the Planning Statement Part 1 [APP-261]. The Applicant is not aware of any change in circumstances that would alter paragraph 2.6.16 of the Planning Statement Part 1 [APP-261]. With visibility of the DCO Application and involvement in the DCO Examination, WSC is able to be cognisant of the Applicant's proposals and the progress of the DCO Examination as WSC moves through its plan-making process. In addition, the Applicant is happy to continue to engage with WSC in relation to this matter.
WSC-43	Planning	Emerging Local Plan	The schemes identified in the planning statement that are deemed too early in the development stage to be relevant to this application may be progressed by the council, neighbouring authorities and statutory stakeholders in due course.	See RR WSC-42 above.
WSC-44	Planning	Emerging Local Plan	It is considered that overall there remains a lack of recognition in the ES of the importance of emerging local plans and projects and how potential impacts may be mitigated. This should be rectified by ensuring continuous and open dialogue with WSC and its key partners through the Examination process.	See RR WSC-42 above.
WSC-45	Planning	Employment	The applicant has failed to address	The Scheme is not anticipated to adversely impact the Cambridge Norwich Tech Corridor (CNTC). It is not

			the impact on the Cambridge Norwich Tech Corridor (CNTC) and further information on is therefore requested by WSC. Section 15 of this submission addresses impacts on the horse racing industry in relation to employment and tourism.	preventing any planned developments related to the CNTC, and would constitute a very small area in the whole of the CNTC, which stretches over the c.100km+ between Cambridge and Norwich. The CNTC has not been referenced in Chapter 12: Socio-Economics and Land Use of the Environmental Statement [APP-044] . It is acknowledged that there could be potential positive benefits to the corridor from the Scheme given that solar energy generation involves advanced technology, and that any direct or indirect employment generated by the scheme might positively impact the corridor. No significant effects are considered to be likely to arise.
WSC-46	Transport and Access	Transport Methodology	WSC consider that the proposals in relation to transport and access are inadequate in a number of ways. In particular, WSC are aware that SCC, as local highway authority, have significant concerns regarding the methodologies for the Transport Assessment [APP-117] and the ES assessment of Transport and Access impacts [APP-045] .	Please refer to the response provided to the SCC's comments on Chapter 13: Transport and Access of the Environmental Statement [APP-045] and Transport Assessment [APP-117] .
WSC-47	Transport and Access	Transport	WSC note that there is a significant lack of detail as to the nature of the works to be carried out to the highway for the purposes of facilitating access and the passage of abnormal indivisible loads.	The numbers of Abnormal Indivisible Loads (AILs) including cranes for Sunnica West A, Sunnica East A, Sunnica East B and Burwell National Grid Substation Extension are outlined in the Framework CTMP & Travel Plan [APP-118] . In total there are 29 cranes and 24 AILs required across the construction period. Swept path analysis (vehicle tracking) has been undertaken of the largest forecast AIL/crane to identify indicative junction layouts required to accommodate the largest vehicle at the site accesses. In addition, a review was undertaken and provided in the Framework CTMP & Travel Plan [APP-118] identifying the suitability of access routes and any potential measures required to facilitate access. This includes locations where signage and street furniture would need to be temporarily relocated to accommodate the movement of the largest AIL/crane from the Strategic Road Network (SRN) and the site accesses.

				Before the movements of the AILs and cranes are undertaken the police will be given advanced notification under the Road Vehicle Authorisation of Special Types Order 2003. In addition, communication and coordination will occur with National Highways and the relevant local highway authority before the AILs/cranes are required onsite to ensure sufficient notification is provided. This also includes the coordination of the temporary removal and subsequent re-instatement of signage and street furniture. Other than the temporary removal of signage and street furniture identified in the Framework CTMP & Travel Plan [APP-118] no highway works are deemed to be required. With regards to the access junctions themselves, detail is provided in terms of kerb alignments required to accommodate the vehicles forecast to use the access, which is demonstrated by swept path analysis (vehicle tracking), as well as visibility splays for each access point. A significant proportion of access junctions are temporary to facilitate construction. Traffic Regulation Measure Plans – Temporary Measures [APP-012 and APP-013] are provided with the Application to detail arrangements required to support safe and suitable access. Where relevant, speed surveys have also been undertaken to inform the traffic management measures and provide appropriate evidence as to their suitability.
WSC-48	Transport and Access	Transport	Significant concerns remain as to the suitability of narrow rural lanes for construction traffic, with numerous sharp bends and junctions known to have poor safety records to be navigated by construction workers and HGV traffic. Even with the proposed street works WSC remains unconvinced that several lanes and junctions will be able to accommodate	The car parking strategy for the construction works has been developed to minimise the need for construction workers to travel on the rural roads. The two construction staff car parks are strategically located in close proximity to the A11. The Sunnica West Site A staff car park is located off La Hogue Road approximately 400m from the A11 and the Sunnica East Site B staff car park is located on Elms Road 1km from the A11 northbound off-slip/Elms Road junction and 1.6km from the Red Lodge Dumbbells Roundabouts, therefore minimising the requirement for construction staff to travel on

			the traffic likely to be generated by the development.	rural roads to/from the site. As a result of the construction staff working hours (0700-1900) staff will be travelling to the site before 0700 and departing the site after 1900. Therefore, the construction staff vehicles will be on the highway network outside of the peak hours. The traffic Regulation Measures Plans – Temporary Road Closures [APP-009 to APP-011] and Traffic Regulation Measures Plans – Temporary Measures [APP-012 and APP-013] identify the proposed traffic management measures to provide safe entry and egress to the construction site accesses. With regards to safety records, the application documents include a review of Personal Injury Collision (PIC) data to establish the safety record. This concluded that there are no specific issues on the network which are likely to be exacerbated by the proposed development. Discussions on highways safety have been ongoing with the highways authorities with a view to resolving a small number of concerns, i.e. the width of Elms Road, U-turning vehicles at the A14/A412 Junction 37 and the use of HGVs through the Newmarket Road/Worlington Road T-Junction, with no other specific road safety concerns raised by the relevant highway authorities. Access reviews were undertaken to assess the routes from the Strategic Road Network to the required site accesses for cranes. The route reviews identified possible routes for the cranes to take to reach the required site accesses. The reviews identified street furniture which is required to be temporarily removed to allow the cranes to pass with the street furniture to be reinstated. Further discussions are underway with the Local Highway Authorities regarding passing points for two-way HGV movements.
WSC-49	Transport and Access	Transport	WSC is concerned that the junction of Freckenham Road and Newmarket Road cannot be made suitable for HGV/crane	Consultation has been undertaken with SCC regarding the HGV use of the Freckenham Road/Newmarket Road junction. During the consultation it was agreed that the HGVs

			use. Similarly, Elms Road is inherently unsuitable for the volume and type of traffic that will be using it and it is unclear whether the Isleham Road/Beck Road bridge can be made safe for use by large/heavy vehicles.	would be escorted through the junction. Further details regarding the forecast number of HGVs and duration are provided in the Framework CTMP & Travel Plan [APP-118]. The Sunnica East Site B staff car park is located on Elms Road 1km from the A11 northbound off-slip/Elms Road junction and 1.6km from the Red Lodge Dumbbells Roundabouts. The location of the construction staff car park minimises the distance the construction staff are required to travel along Elms Road. In addition, road widening along Elms Road between the site accesses and the A11 is identified in the Framework CTMP & Travel Plan [APP-118]. Consultation has been undertaken with Historical Railways Estate (on behalf of Department for Transport) regarding the Isleham Road/Beck bridge which identified the arch was last assessed in 2011 with a capacity of 40/44t. The weight of the HGVs is to be less than this weight capacity and an alternative site access and route was identified for cranes which avoids the Isleham Road/Beck bridge.
WSC-50	Transport and Access	Transport	WSC is also particularly concerned regarding the impact of the proposal on street U6006. It is unclear how this 'green route' will be protected for the duration of construction and for the lifetime of the development. Of note is the intention to create a vehicular access across a route that is predominately used by non-motorised users.	U6006 is an unclassified road which is a publicly accessible route, including for equestrians and extends northwards from Elms Road to Worlington. As an unclassified road, we understand that it is subject to a public right of vehicular access, although it is narrow, unpaved and enclosed along a substantial part of its length by dense vegetation. A short section of U6006 is required to be temporarily closed during the construction of the cable corridor for the cable to cross U6006. The closure is expected to be for a maximum of three weeks which is expected to be a worst-case scenario. Appropriate signage and warning will be provided regarding the short-term temporary closure of U6006. Aside from the closure, the U6006 will remain open for public use with no management required. It is not uncommon in a largely rural environment for vehicles to cross routes such as the U6006, and all road users can be expected to have regard to the highways code. The design approach to mitigate effects on people using this route predominantly for recreation is to provide substantial offsets and boundary planting, as shown

				in the sections included within the Landscape and Ecology Plan [APP-108].
WSC-51	Human health	Transport	The impact of the proposal on non-motorised users results in a negative health impact on accessibility and active travel and social cohesion and lifetime neighbourhoods. WSC considers this to be unacceptable.	Each of the PRowWs are forecast to be closed for a maximum of three weeks which is expected to be a worst-case scenario. The closures of the PRowWs will occur at different stages during the construction phase with no closures forecast during the operational phase. New permissive paths are included within the Scheme to provide new routes for Non-Motorised Users (NMUs) which will last the lifetime of the Scheme. It is not considered the impact of the short-term temporary closures of the eight PRowWs will have a significant impact. The Scheme is located in a rural area with limited footways and pedestrian and cycle facilities in the area. This is due to the rural nature of the surrounding local roads however these are lightly trafficked. The HGV routes during the construction phase have been identified to minimise the routes through local villages as much as practically possible. The primary HGV routes are to/from the A11 along Elms Road circa 500m-800m and circa 400m of La Hogue Road, where the level of NMU activity is expected to be minimal. In addition, Personal Injury Collision (PIC) data was obtained from SCC and CCC with the analysis showing no incidents were recorded in the immediate vicinity of the Sunnica East Site A and B accesses or Sunnica West Site A and B accesses within the most recent five years of PIC data obtained.
WSC-52	Human health	Transport	The applicant has failed to recognise the general stress and anxiety impacting on quality of life and wellbeing that will be caused from a project of this scale and	The quality of life for local communities has been considered in the assessments undertaken as part of the Environmental

			nature, in close proximity to a number of communities.	Impact Assessment and detailed within the following submission documents: • Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042]; • Chapter 11: Noise and Vibration of the Environmental Statement [APP-043]; • Chapter 12: Socio-Economics and Land Use of the Environmental Statement [APP-044]; • Chapter 13: Transport and Access of the Environmental Statement [APP-045]; • Chapter 14: Air Quality of the Environmental Statement [APP-046]; and • Chapter 15: Human Health of the Environmental Statement [APP-047]. There would be no likely significant effects for noise and vibration, transport and access, air quality and human health. A summary of the likely significant effect predicted for landscape and visual amenity and socio-economics and land use is provided in Chapter 18: Summary of Significant Environmental Effects of the Environmental Statement [APP-050].
WSC-53	Glint and Glare	Other	WSC has no expertise to comment on the content of this report. We would recommend that all parties with an interest in this impact of the proposal are consulted	This comment is noted. The Applicant has carried out extensive non-statutory and statutory consultation in accordance with the Planning Act 2008 which is described in detail in the Consultation Report [APP-026 to APP-031] . Discussions with relevant stakeholders has continued in the pre-Examination and Examination periods.
WSC-54	Glint and Glare	Other	In relation to effects on aircraft, the proximity of RAF Mildenhall and RAF Lakenheath should be taken into account.	The proximity of the Scheme to RAF Mildenhall and RAF Lakenheath has been taken into account and was considered in the Glint and Glare Assessment presented in Appendix 16A of the Environmental Statement [APP-121] . The assessment considered the likelihood of panel visibility and glint and glare impacts from these receptors. No reflections were predicted for aviation receptors at RAF Mildenhall,

				which is the closest aviation receptor to the Scheme, and no effects were anticipated for receptors at RAF Lakenheath and Cambridge Airport due to their distance from the Scheme and orientation of the runways. Paragraph 2.52.5 of Draft NPS EN-3 states the following in relation to potential glint and glare impacts on aviation: <i>“There is no evidence that glint and glare from solar farms interferes in any way with aviation navigation or pilot and aircraft visibility or safety. Therefore, the Secretary of State is unlikely to have to give any weight to claims of aviation interference as a result of glint and glare from solar farms.”</i>
WSC-55	EIA Process	Soil and Groundwater Assessment	It is noted that a DCO requirement is proposed which would require a site investigation to be undertaken at the post consent stage to provide geo-environmental data to evaluate soil and groundwater quality. We welcome this proposed further assessment.	This comment is noted.
WSC-56	Decommissioning	Framework Construction Environmental Management Plan	The Applicant makes reference in Table 16.8 [APP-048] to the Framework Construction Environmental Management Plan [APP-123], which appears to be very light on detail at the operational and decommissioning stages. With the exception of the Outline Battery Fire Safety Management Plan [APP-267] there is no specific detail on the risks associated with major accidents and disasters, with the generic statement that ‘all works will be undertaken in accordance with relevant Health and Safety Legislation and Guidance’.	Appendix 16C: Framework Construction Environmental Management Plan (CEMP) of the Environmental Statement [APP-123] only considers the mitigation and management measures required during the construction phase and does not include any measures to be adopted during operation and decommissioning. A separate Framework Operation Environmental Management Plan (OEMP) [APP-126] and a Framework Decommissioning Environmental Management Plan (DEMP) [APP-125] have been submitted with the DCO Application. These cover the mitigation and management measures that will be adopted during operation and decommissioning. The Framework CEMP [APP-123], Framework OEMP [APP-126] and Framework DEMP [APP-125] have been updated since submission of the application and will be submitted to the Examination at Deadline 2.

				Major Accidents and Disasters have been assessed in Chapter 16 Other Environmental Topics of the Environmental Statement [APP-048]. Minimising the risk of major accidents during construction, operation and decommissioning will be addressed through appropriate risk assessments that will be undertaken prior to construction, as required by the Framework CEMP [APP-123], OEMP [APP-126] and DEMP [APP-125].
WSC-57	Operations	BESS Safety	WSC remains concerned that the lack of details contained within the application regarding the size of the BESS and the technology that will be utilised means that the impact of a battery fire cannot be fully assessed. It has been well documented that Lithium-ion battery energy storage systems are at risk of thermal runaway and that, unchecked, such an event could be catastrophic.	Details on the size and the technology to be used for the BESS will be confirmed during the detailed stage, prior to construction. Given the fast-changing nature of the technology, it is important for the Applicant not to limit the types of technology that can be used as part of the Scheme at this stage, therefore the draft DCO [APP-019] and supporting Works Plans [APP-007] propose a degree of flexibility to allow the latest technology to be utilised at the time of construction. The use of design parameters has been adopted to present a likely worst-case assessment of potential environmental effects of the Scheme that cannot yet be fixed. Wherever an element of flexibility is maintained, such as with BESS, the likely worst-case impacts have been reported in the Environmental Statement. This ensures the potential impacts associated with BESS are fully assessed. The design parameters used for the ES assessment are included in Table 3-2, Chapter 3: Scheme Description of the Environmental Statement [APP-035]. There are three BESS compounds, with maximum footprints of the compounds being up to: Sunnica East A – 66,000m²; Sunnica East B – 162,000m²; Sunnica West A – 83,000m². The maximum dimensions of each BESS Battery Container are 17m by 5m footprint and up to 6m in height.

				Furthermore, the Outline Battery Fire Safety Management Plan [APP-267] outlines the mitigation and design measures required to reduce the risk of a catastrophic event. Consultation has been undertaken with the relevant Statutory Consultees, i.e., Suffolk Fire Services, who have noted the acceptability of the measures that are proposed. Since submission of the original Outline Battery Fire Safety Management Plan [APP-267], the document has been peer reviewed and updated. The Applicant intends to submit the revised draft of the Outline Battery Fire Safety Management Plan at Deadline 2.
WSC-58	Operations	BESS Safety	WSC is not able to comment on the effects of this occurrence at this stage, however, it remains concerned that further simulation of the likely impacts from a failure of the BESS, including potential dust and toxic clouds, and their impact on nearby communities, is required.	An air quality risk assessment has been undertaken ('Unplanned Atmospheric Emissions from Battery Energy Storage Systems (BESS) [APP-124]'). However, a traditional consequence modelling exercise will be undertaken once the detailed design is known and before operation begins; this will ensure the final design is not predicted to lead to any effects worse than presented in the Environmental Statement. This is stated in the Design Principles which are within Appendix B of the Design and Access Statement [APP-264]. Consequence modelling requires detailed input data regarding the emissions etc., which is why it has not been undertaken at this stage. The risk assessment is a conservative assessment and demonstrates that the risk of impacts from a fire at the BESS is low. While a detailed consequence modelling assessment will be undertaken, there are not anticipated to be adverse impacts.
WSC-59	Construction	Fuel consumption / Emissions.	The applicant should set out an approach to reduce fuel consumption and associated emissions. Clear targets for reducing consumption and emissions should be set out and monitored, with consideration to the region's net zero goals. In addition, the applicant should provide details of arrangements for the	The Principal Contractor appointed for the construction phase will be responsible for preparing and implementing a Construction Resource Management Plan (CRMP), which will set out targets for fuel, waste and energy consumption. The contractor will also provide details on fuel storage, and management of spills/leaks during construction. These requirements and management measures are included within

			storage of fuel and the management and containment of any fuel spillages/leaks. Details of remediation strategies should also be provided.	the Framework CEMP [APP-123] and will be developed within the detailed CEMP(s) developed for the Scheme.
WSC-60	Construction	Construction noise	WSC does not feel that the Considerate Constructors Scheme (CCS) [APP-123] is a robust enough standard to ensure that a development of this size and national significance is appropriate for managing and reducing the environmental impacts arising – especially in relation to the fuel inputs, vehicle journeys, waste generated, and water usage.	The Applicant considers that the Considerate Constructors Scheme (CCS) is a robust standard if followed alongside the measures included within the Framework CEMP [APP-123] and those to be included within the detailed CEMP(s), which will be produced prior to construction. The LPA's will be responsible for approving the contents of the detailed CEMP(s) and any section 61s and therefore, will have control over the detailed measures implemented.
WSC-61	Other	Impact on Horse racing industry	The applicant has failed to conduct a detailed, genuine assessment of the impact of the proposal at the construction, operation and decommissioning stages on the horse racing industry. The impact of construction traffic in particular, in an area already subject to congestion, as well as detrimental landscape impacts remain a very serious concern to WSC. Further details on these points will be set out in the LIR.	Based on the comment, the Applicant assumes that the primary transport concern is congestion. Chapter 13: Transport and Access of the Environmental Statement [APP-045] and the Transport Assessment [APP-0117] provides a full assessment of the impact of the construction vehicles. As a result of the construction working hours the construction staff will travel to the site before 0700 and depart the site after 1900 therefore avoiding the network peak hours. A thorough assessment of the construction phase has concluded that there will not be significant environmental effects in terms of driver delay. How much of an impact construction traffic serving the Sunnica site will have on horses crossing can be answered in relative terms. Although the route, volume and timing of construction traffic movements are of relevance, the racing industry in Newmarket already operates with relatively high traffic volumes. Trainers, riders and horses adapt to this environment because it is a daily routine. As well as crossing roads, racehorses also use bridle paths running alongside these roads to reach the public gallops. Even though young horses training in Newmarket tend to be more 'traffic proofed' than perhaps their contemporaries on private yards in more remote locations. The main consideration for riders and rider safety is that road users are alert to potentially highly-strung

				horses approaching or waiting at crossing points and should give way in a timely manner. An argument could be made that increased traffic volumes will cause driver behaviour to be less accommodating towards horses wishing to cross a road, but this is hypothetical. The Landscape and Visual Impact Assessment (LVIA) set out in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] summarises the effects on sensitive receptors, including those associated with the horse racing industry. The assessment concludes that there will only be one residual visual significant effect from the Limekilns. In addition, through consultation with Godolphin's Stud Farm, appropriate measures to mitigate effects from their gallops have been embedded in the Scheme, including visual screening and timing of the works.

2.5 RR-1208 Environment Agency

Applicant responses to RR-1208

Applicant's Ref.	Theme	Issue	Summary of issue raised	Applicant's response
EA-1	Water Resources	Flood Risk Assessment	Burwell Substation should be considered to lie within Flood Zone 3a for the purpose of applying the Sequential and Exception Tests and the FRA should be amended accordingly. The FRA should include breach analysis / modelling to determine the predicted flood depth in the event of a breach of the flood defences during a 1 in 100 year event, including an appropriate allowance for climate change.	Regarding Breach assessment; flood levels of the Burwell Lode nearest the substation are discussed in Table 11 of the Flood Risk Assessment (Appendix 9C of the Environmental Statement [APP-095]). The 65% climate change mapping shows the Lodes are not overtopped along the watercourse reaches around the substation and surrounding area. The nearest 1 in 100 year plus 20% allowance for climate change modelled level near the substation is 2.19m AOD from the model results. The lowest bank level noted on the EA product data is 2.79m AOD. A precautionary maximum breach level could be taken as 2.25m AOD (1 in 1000 year flood level). The Applicant proposing finished flood levels of 850mm above existing ground in the

				substation to account for breaches and sea level rise; this would provide finished levels in the region of 2.45m AOD, to any new structure in the substation, 200mm above the 1 in 1000 year flood level of 2.25m AOD A meeting was held with the Environment Agency on the 7th March 2022 to discuss the responses to Burwell substation extension, and this issue remains under discussion. The Applicant is currently undertaking further modelling, the technical scope of which has been agreed with the Environment Agency, and consultation with them is continuing. The results of the modelling will be shared with the Environment Agency during the early stages of the examination.
EA-2	Water Resources	Flood Risk Assessment	Table 13 of the FRA states that two of the solar stations (within W10 and W15) are located within Flood Zone 3 and two other solar stations are located in very close proximity to Flood Zone 3 (within W11 and W15). The FRA states that these solar stations will need to be raised above predicted flood levels but the relevant predicted flood levels are not included in the FRA. In addition, no consideration has been given to the potential loss of floodplain and increase in flood risk elsewhere. It is not acceptable to assume that if stilts are used there would be no material impact on flood risk elsewhere, as indicated in the FRA, as voids can become blocked by debris over time and may be used for storage purposes.	The Flood Risk Assessment (FRA) [APP-095 to APP-098] has assessed the potential for the Scheme to impact flood risk on or off the site. The FRA [APP-095] paragraph 4.3.8 concludes that the legs that support the solar panels are <100mm in diameter and pose no increased risk to flood risk and therefore do not require compensation (in respect to the floodplain around the River Lark). Solar inverter stations occupy approx. 4m³ per station resulting in a negligible impact in floodplain volume within the rural catchment. Legs are spaced sufficiently apart that they are unlikely to trap debris and there are no continuous voids. Development within the Order limits will not increase the existing flood risk on or off site as a result of the development proposals. However, during a meeting with the Environment Agency on 7th March 2022, the need for more discussion over the need for floodplain compensation and hydraulic modelling to demonstrate this was highlighted and this is currently under discussion. The Applicant is currently undertaking further modelling, the technical scope of which has been agreed with the Environment Agency, and consultation with them is continuing. The results of the modelling will be shared with the Environment Agency during the early stages of the examination.

EA-3	Water resources	Flood Risk Assessment	The FRA indicates that some of the solar PV panels will be located within Flood Zone 3. The proposed mitigation measure for these PV panels is to raise them 850mm above ground level. As no modelled flood levels have been provided in the FRA, it is unclear whether these will be raised high enough to ensure they would remain operational in the event of flooding and there would be no impedence to flood water flows.	A meeting was held with the Environment Agency on the 7th March 2022 and this issue remains under discussion. The proposed height of PV panels was previously agreed with the Environment Agency as 950mm; this was reduced to 850mm in response to LVIA outcomes. The EA responded that the 850mm should be acceptable based on the lower risk from climate change impacts in this area (applying the latest climate change allowance guidance online). The Applicant is currently undertaking further modelling, the technical scope of which has been agreed with the Environment Agency, and consultation with them is continuing. The results of the modelling will be shared with the Environment Agency during the early stages of the examination.
EA-4	Water resources	Flood Risk Assessment	No drawings have been included in the FRA showing the site layout in relation to the flood zone extents. This is required to demonstrate that a sequential approach has been taken to the site layout and to clearly show which parts of the development are located within flood risk areas and therefore require flood risk mitigation measures. The FRA states that no above ground development will be located within Flood Zone 3b but this has not been demonstrated in the FRA.	A sequential test has been undertaken and is presented in the text of the FRA [APP-095], which states in Section 4.3.7 that: <i>'The design development for the layout of the Scheme has also followed a sequential approach in accordance with paragraph 5.7.9 of NPS EN-1 and the NPPF. Flood risk to the Order Limits has been a design consideration, with the design aiming to locate vulnerable Scheme components in the lowest flood risk zones. This approach has resulted in only very small areas of solar PV being located in Flood Zone 3a and no development within Flood Zone 3b.'</i> In addition, the FRA [APP-095] states in paragraph 4.3.8, <i>'From the topographical survey, the River Lark bank level is approximately 3.0m AOD in the north east corner of the site where solar PV panels are proposed (the only area that solar PV panels encroach in Flood Zone 3a).'</i> This is considered by the Applicant to adequately define where infrastructure will be located in high flood risk areas; however, consultation with the Environment Agency is on-going.

				This is also documented in the Framework CEMP [APP-123], which in Table 3-2, states '<i>No part of the authorised development would be located within fluvial Flood Zone 3b extents, although part of the Order limits includes land in this flood zone.</i>' This will be secured through Requirement 14 of the draft DCO [APP-019].
EA-5	Water resources	Temporary use of land within the floodplain	No drawings have been included in the FRA to show the proposed location of any temporary site compounds and storage areas in relation to the flood zone extents. All site compound areas / storage areas should be located outside the extent of Flood Zone 3, or outside the 1 in 100 year modelled flood extent, to ensure there is no loss of floodplain and no increase in flood risk elsewhere during the construction phase.	Temporary compounds and storage areas will not be within areas at risk of flooding. The Framework CEMP [APP-123] in Table 3-4 outlines measures to manage Flood Risk, this includes the following requirements: - <i>No part of the authorised development would be located within fluvial Flood Zone 3b extents, although part of the Order limits includes land in this flood zone.</i> - <i>Topsoil and other construction materials will be stored outside of the 1 in 100 year floodplain extent. If areas located within Flood Zone 2 are to be utilised for the storage of construction materials, this will be done in accordance with the applicable flood risk activity regulations, if required.</i> - <i>The construction laydown area site office and supervisor will be notified of any potential flood occurring by use of the Floodline Warnings Direct or equivalent service.</i> This will be secured through Requirement 14 of the draft DCO [APP-019]. The above is considered by the Applicant to provide confidence that compounds and storage areas are outside of the flood zone; however, consultation with the Environment Agency on this point is on-going.
EA-6	Water resources	Disapplication of consents	The Applicant seeks to disapply the need for flood risk activity permits under the Environmental Permitting (England and Wales) Regulations 2016. We are content to agree to this in principle subject to the agreement of a satisfactory form of protective provisions for the benefit of the	The Applicant looks forward to concluding discussions with the Environment Agency on the terms of its protective provisions in due course. In relation to the local legislation that would be disappplied by the draft DCO [APP-019], an explanation is provided in paragraph 5.2.16 of the Explanatory Memorandum [APP-020] which

			Environment Agency. We are currently in discussions with the applicant about this. The applicant also seeks to disapply a number of local Acts. We consider the applicant should explain the need for the disapplication of the relevant legislation.	explains that the disapplication of those provisions is necessary to ensure that they cannot unduly interfere with the delivery of this nationally significant infrastructure project. The Applicant has applied a precautionary approach when reviewing the local legislation. All of the local legislation listed in Schedule 3 is historic and the precise geographic extent of its application is difficult to ascertain. However, it should be noted that article 6(1)(f) of the draft DCO [APP-019] disapplies the local legislation listed in Schedule 3 only in so far as the provisions still in force are incompatible with the powers contained within the DCO. The Applicant considers this to be a proportionate approach which goes no farther than it needs to, in order to ensure the delivery of the Scheme.
EA-7	Water resources	Groundwater and contamination	We are satisfied that our previous comments and recommendations have been brought forward into the draft DCO, including requirements for further site investigations to confirm ground conditions / update conceptual site models and risk assessments, then to take appropriate mitigation actions in line with relevant guidance. Specifically, we note the following Draft DCO Schedule 2 Requirements: • 12 (surface and foul water drainage) • 14 (construction environmental management plan) • 18 (ground conditions / contamination) and the following commitments in the supporting documents: • Consultation Report - Table 6-18. • Framework CEMP – Table 3-10.	The Environment Agency's comments are noted.

EA-8	Water resources	Pollution prevention	We have reviewed the following documents: - Volume 6 Environmental Statement. 6.2 Appendix 16D: Unplanned Atmospheric Emissions from Battery Energy Storage Systems (BESS) (ref EN010106) - Volume 7. 7.6 Outline Battery Fire Safety Management Plan. (ref ENV010106) We are satisfied that an appropriate assessment of risk and mitigation measures has been considered.	This comment is noted.
EA-9	Ecology	Biodiversity	We are satisfied that an appropriate assessment of risk and mitigation measures have been considered.	This comment is noted.

2.6 RR-1226 Historic England

Applicant responses to RR-1226

Applicant's Ref.	Theme	Issue	Summary of issue raised	Applicant's response
HE-01	Heritage	Assessments	We are aware the proposed development lies within a sensitive area for the historic environment, in the setting of a range of high value heritage receptors. It was agreed during the pre-application process that detailed assessment of the historic environment would be required for the application, and a number of the specific measures were recommended and undertaken. This included a Desk Based Assessment, an assessment of the impact of the proposal on the settings of heritage assets, as well as geophysical survey and	The comment is noted. The desk-based assessments form Appendices 7C [APP-059], 7D [APP-060] and 7E [APP-061] of the Environmental Statement. The geophysical survey is in Appendix 7F [APP-062 to APP-072] and 7G [APP-073 & APP-074], and the trenching reports are in Appendix 7I [APP-076] for Sunnica West, with the interim report for Sunnica East in Appendix 7H [APP-075] of the Environmental Statement. The assessment of the impact on the setting of heritage assets is located within Section 7.7 of Chapter 7: Cultural Heritage of the Environmental Statement [APP-039].

			trial trenched evaluation. The information provided is of a high standard and we broadly accept the conclusions. Further detailed comments will be provided in our written representation.	
HE-02	Heritage	Designated heritage assets	Our primary consideration in relation to this scheme is the impact of the proposal on the significance of the designated heritage assets within the vicinity. Namely, the changes to the setting of the grade II registered park and garden known as Chippenham Park (1000615).	The comment is noted. The assessment of Chippenham Park is contained within paragraphs 7.7.74 to 7.7.77 in Chapter 7: Cultural Heritage of the Environmental Statement [APP-039] and within the Harm Statement which forms Appendix D of the Planning Statement [APP-263] .
HE-03	Heritage	Designated heritage assets	We will comment upon the impact upon the significance of the four designated barrows within the Sunnica West Area, which are a scheduled monument known as the 'Four bowl barrows north of the A11/A14 junction, part of the Chippenham barrow cemetery' (NHLE 1015246).	The comment is noted. The assessment of the designated barrows is contained within paragraphs 7.7.67 to 7.7.70 in Chapter 7: Cultural Heritage of the Environmental Statement [APP-039] .
HE-04	Heritage	Designated heritage assets	We will comment upon the impact of the proposal on the significance of the scheduled monument known as Roman villa south of Snailwell Fen (NHLE1006868), through development within its setting. The villa site is located on the western boundary of Sunnica West B.	The comment is noted. The assessment of the Roman villa is contained within paragraphs 7.7.109 to 7.7.110 in Chapter 7: Cultural Heritage of the Environmental Statement [APP-039] .
HE-05	Heritage	Designated heritage assets	Historic England are keen to ensure the avoidance of significant impacts to these designated heritage assets. However, we confirm that in this case, whilst we consider that there would be some harm to their significance the impact is at a level we consider is likely to be broadly acceptable in policy terms. Nevertheless, we are keen	The comment is noted. Mitigation has been embedded within the Scheme design to limit impacts on designated heritage assets and will be secured through a management plan which will form part of the detailed Construction Environmental Management Plan (CEMP) to be prepared following the appointment of a contractor, prior to the start of works. The CEMP will include a Heritage Management Plan that will be developed in accordance with the Detailed Archaeological Mitigation Strategy (DAMS) and the

			to ensure however that there is adequate mitigation to reduce impacts and to reduce any resulting harm further. Further advice will therefore be offered through our Written Representation in relation to the registered park and garden and the scheduled monuments as well as commentary on other highly graded and designated heritage assets affected by the scheme, and on the proposed mitigation.	requirement for this will be set out in the updated Framework CEMP [APP-123] to be submitted early in Examination. This Heritage Management Plan will detail the areas to be excluded, the construction methodology, the long-term management proposals, and any decommissioning phase. Table 3-2 in the Framework Construction Environment Management Plan [APP-123] contains outline details for the areas which have been removed from the developable area due to the presence of archaeology. The Landscape and Ecology Management Plan [APP-108] also contains further information. Information on the management of these sites during construction will be set out within the Detailed Archaeological Mitigation Strategy.
HE-06	Heritage	Non-designated heritage assets	We are also aware the development will result in a range of potentially significant impacts on a number of non-designated heritage assets and archaeological sites, we will not be commenting on this matter and will defer to the LPA and their expert and specialist advisors.	The comment is noted.

2.7 RR-1291 Natural England

Applicant responses to RR-1291

Applicant's Ref.	Theme	Issue	Summary of issue raised	Applicant's response
NE-01	Ecology	Protected species	The following European protected species may be affected by the proposed project: 2.3.1. Bats 2.3.2. Otter.	This comment is noted and concurs with the Applicant's assessment, as presented in Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] .
NE-02	Ecology	Protected species	The following Nationally protected species may be affected by the proposed project: 2.4.1. Badger 2.4.2. Water Vole 2.4.3. Wintering birds and breeding birds	This comment is noted and concurs with the Applicant's assessment, as presented in Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] .

			including Barn Owl, Common Quail, Hobby and Little Ringed Plover.	
NE-03	Ecology	Sensitive habitats	The following areas of non-designated but valuable and sensitive habitat and natural resources could be affected: 2.5.1. Soils including best and most versatile land 2.5.2. Priority Habitat: Arable field margins, hedgerows, lowland calcareous grassland and lowland dry acid grassland 2.5.3. Havacre Meadows and Deal Nook County Wildlife Site.	This comment is noted and concurs with the Applicant's assessment, as presented in Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] .
NE-04	Transport and Access	PRoW	The proposed scheme may impact access for walkers, cyclists and horse riders through temporary loss or severance of public rights of way.	Chapter 13: Transport and Access of the Environmental Statement [APP-045] discusses the impact of the Scheme on Non-Motorised Users (NMUs) (pedestrians, cyclists and horse-riders) and Public Rights of Ways (PRoWs). The Temporary Road Closures Plans identify the PRoWs that are required to be closed for a maximum of three weeks, which is expected to be a worst-case scenario, during the construction phase. It is concluded that the impact on NMUs and PRoWs will occur during the construction period only and will be short-term and temporary in nature.
NE-05	Land Use	Soil	Long term effects on agricultural land and soils are considered negligible and non-significant provided the development is limited to a maximum of 40 years and undertaken with steel piles and limited ground disturbance.	This comment is noted and the Applicant agrees with the conclusions. As will be required should the DCO be granted, the development will have a maximum operational life of 40 years and the land will be returned to the landowners at the end of this period. The land use will no longer be under the control of the Applicant once this period is over and the land is returned to the landowner. During construction, low disturbance methods will be used to install the photovoltaic panels. Module mounting structures will be driven into the ground, with foundations reaching a maximum depth of 3.5m. Modules will be mounted with the PV panels by hand. Further details on the construction activities can be found

				in Section 3.6 of Chapter 3: Scheme Description of the Environmental Statement [APP-035] .
NE-06	Ecology	Statutory designated sites	Further clarification is still required concerning: 2.9.2.1. Measures to offset impacts to Stone Curlew, a qualifying species of Breckland SPA.	The assessment of the impacts of Stone Curlew occurring outside the Breckland SPA is presented in Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] and Section 5.3 of the Habitats Regulations Assessment - Report to Inform an Appropriate Assessment [APP-092] . As detailed in section 1.8 of Appendix 10I: Landscape and Ecology Management Plan of the Environmental Statement [APP-108] and the Offsetting Habitat Provision for Stone-Curlew Specification [APP-258] , the Scheme has embedded sufficient areas within the Scheme design to offset any potential reduction in arable farmland, that may, in any given year, be used by Stone Curlew and avoid a net reduction in breeding and foraging opportunities for the species. The Applicant will continue to discuss the details of these specifications with Natural England to reach agreement on the principles of the specification; and the draft DCO [APP-019] is to be updated in due course to require these discussions to also continue post consent.
NE-07	Noise and Vibration	Statutory designated sites	Further clarification is still required concerning: 2.9.2.2. Further details of noise and light impacts to Chippenham.	Both direct and indirect impacts to Chippenham Fen designated sites are addressed in Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] and Appendix 8M Habitats Regulations Assessment - Report to Inform an Appropriate Assessment [APP-092] , including noise and light impacts during construction. It is acknowledged that construction activities will occur within 100m of the Fen and therefore, specific mitigation measures have been embedded to prevent indirect impacts, such as those to mitigate potential impacts of construction noise and lighting (Table 8-9 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040]) and will be secured through the Framework CEMP [APP-123] . Table 8-9 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] sets out the potential impacts to these designated sites and explains and justifies why there will be no direct impacts. The same table also considers indirect impacts during construction,

				including noise and lighting, (Appendix 11D – Construction Noise Modelling [APP-112] and Figures 11-2 [APP-234] and 11-3 [APP-235]). These assessments conclude that there will be no significant effects on the Chippenham Fen designated sites from construction. There are no pathways (e.g. habitat loss or disturbance to designated site features such as through noise, water quality, air quality, lighting or visual), during operation of the Scheme which could affect these statutory designated sites. There will be no lighting of the perimeter fence at Sunnica West Site B and maintenance visits will be undertaken as outlined in Framework OEMP [APP-126] and secured through the DCO. The nearest property in Chippenham is over 1 km from the Order limits. Consequently, noise is unlikely to be perceptible during the operational phase of the development.
NE-08	Ecology	Statutory designated sites	Further clarification is still required concerning Fen 2.9.2.3. Further air quality assessment on the impact of vehicular traffic associated with the construction of the project on sites outside of the Order limits (Breckland SPA, Devil's Dyke SAC, Rex Graham Reserve SAC).	Both direct and indirect impacts to designated sites are addressed in Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] and Appendix 8M Habitats Regulations Assessment - Report to Inform an Appropriate Assessment [APP-092], including changes to air quality arising from construction traffic and activities. There are no residual effects that would constitute an adverse effect on the integrity of European Sites either alone or in combination with other plans or projects. It is acknowledged that construction activities will occur within 100m of Chippenham Fen and therefore, specific mitigation measures have been embedded to prevent indirect impacts, such as from dust generating activities (paragraph 8.8.27 and Table 8-9 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040]) and construction noise and lighting (Table 8-9 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040]) and will be secured through the Framework CEMP [APP-123].

				Devil's Dyke is over 4.7 km from the nearest affected route in the traffic model, and Rex Graham Reserve is 3.4km from the road network and will not be affected by the Scheme in terms of nitrogen deposition. Closer designated sites have been assessed and found not to be at risk from the Scheme (see Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] and Appendix 8M Habitats Regulations Assessment - Report to Inform an Appropriate Assessment [APP-092]).
NE-09	Water Resources	Statutory designated sites	Further clarification is still required concerning 2.9.2.4. Hydrological impacts to Brackland Rough SSSI.	No hydrological and water quality impacts on Bracklands Rough SSSI are predicted by virtue of a lack of a pathway to the receptor and the mitigation proposed by the Scheme. Bracklands Rough is located approximately 350m northwards from Sunnica West B. The SSSI area is located to the east of the River Snail and is designated for its wet woodland habitats. The River Snail flows along the western boundary of the SSSI, but a review of the citation shows that the SSSI is not designated for any relevant riverine habitats directly. The hydrology of the SSSI will be complex and dependent on a number of factors including infiltrating and seeping surface water runoff from the shallow slope to the east, and groundwater levels, which may be influenced by flows in the River Snail (among many other local factors). However, during operation the surface water drainage strategy ensures the site drainage will mimic natural conditions and the Scheme will not affect flows along the River Snail and thus potentially the hydrology of the SSSI indirectly. During normal flows, there is also no pathway for pollutants that may be released from runoff from the construction or operation of the Scheme to affect the SSSI, as these would be confined to the River Snail. However, regardless of this, the Scheme has included mitigation measures to ensure that the River Snail itself is not polluted during construction or operation phases. Within Chapter 9: Flood Risk, Drainage and Water Resources of the Environmental Statement [APP-041] paragraphs 9.8.79 to 9.8.93 relates to the assessment of potential construction

				impacts from Sunnica West Site B and paragraphs 9.8.121 to 9.8.135 for Grid Connection Route B to the River Snail. The assessment concludes there would be no significant impacts to either surface water or groundwater from Sunnica West B and Grid Connection Route B. Based on there being no significant impacts to surface water or groundwater from Sunnica West B and Grid Connection Route B, it is considered there would be no significant source of impacts to Brackland Rough SSSI which is located north of Sunnica West B. Relevant mitigation measures are discussed further below. During construction a Construction Environmental Management Plan will be implemented in accordance with Requirement 14 of Schedule 2 of the draft DCO [APP-019]. A version of this plan has already been prepared and submitted with the application as Environmental Statement Appendix 16C: Framework Construction Environmental Management Plan [APP-123]. It outlines the measures which need to be taken to prevent discharge of any contaminative substances during construction into controlled waters, including silts, oils and fuels, cementitious substances etc. During operation, the surface water drainage strategy is designed to mimic natural conditions and includes SuDSs to ensure water quality mitigation for any low level of contaminants in the surface water runoff. A SuDS Simple Index Method assessment concludes the provided mitigation is sufficient. Refer to Chapter 9: Flood Risk, Drainage and Water Resources of the Environmental Statement [APP-041] for further details. Finally, online flood maps suggests that any flooding from the River Snail is to the west and away from the SSSI and so even under flood conditions there would not be a pathway to convey any chemical pollutants from the construction or operation of the Site to the SSSI. This is supported by analysis of lidar data that suggest that the ground immediately west of the River Snail is elevated preventing flood flows from entering the SSSI.

NE-10	Ecology	Non-statutory sites	Impacts of the project during the construction phase to Havacre Meadows and Deal Nook County Wildlife Site requires further clarification.	Havacre Meadows and Deal Nook County Wildlife Site (CWS) (14.1 ha) is within the footprint of the Grid Connection Route A2. The site qualifies as a CWS because it is over 10 ha in size and contains semi-improved grassland, woodland, scrub and open water in close association. The willow carr of the NVC Alder - Stinging Nettle woodland community (W6), qualifies as a CWS in its own right. Table 8-9 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] considers the impacts of the Scheme on the CWS. There will be no direct impacts on any of these habitats and measures will be put in place to prevent incursion during construction, e.g. security fencing and buffer zones early on in the construction process. The construction of the Scheme for the Grid Connection will utilise non-intrusive methods for crossing the CWS, including the River Kennett and as such, will not directly impact habitats within the CWS. This will be set out in the updated Framework Construction Environmental Management Plan [APP-123] provided with the response to the Relevant Representations and secured within the detailed CEMP. Boundary vegetation, such as hedgerows connecting woodland sites will be retained, which will allow for connectivity across the Order limits. Impacts on watercourses, including the River Kennett, are also considered in Chapter 9: Flood Risk, Drainage and Water Resources of the Environmental Statement [APP-041] and the Water Framework Directive Assessment [APP-094]. Tables 3-3 and 3-4 of Framework CEMP [APP-123] set out the measures which will be secured to protect designated sites and watercourses during construction.
NE-11	Ecology	Biodiversity Net Gain	The proposals will directly and indirectly impact habitats and structures that support European and nationally protected species. Losses in habitat extent and continuity will require suitable	With reference to Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] , protected species identified as part of the detailed baseline surveys are reported in Tables 8-7 and 8-8, with an assessment of likely impacts and effects undertaken in section 8.9. Paragraphs 8.817-8.8.23 and

			avoidance and mitigation / compensation measures.	8.8.28 set out avoidance and mitigation measures for protected and notable species.
NE-12	Ecology	Biodiversity Net Gain	Further assessment is required by the applicant to distinguish biodiversity net gain calculations from mitigation and offsetting provision for impacts to statutory designated sites, priority habitats and protected species.	The Biodiversity Net Gain Assessment [APP-259], using Defra's Biodiversity Metric 3.0, sets out the approach and evidence used in undertaking the calculations, along with adequate detail to interpret the results. Natural England's comments will be taken into consideration as part of an updated calculation of Biodiversity Net Gain which will provide the detail as requested for the calculations using the latest Biodiversity Net Gain metric 3.1. This will be provided at the earliest convenience during the Examination process.
NE-13	Land use/ operations	Agricultural land	We consider that the proposed development, if temporary as described, is unlikely to lead to significant permanent loss of BMV agricultural land, subject to the following: 3.4.2.1. The development has a maximum operational life of 40 years 3.4.2.2. The land is returned to agricultural use at the end of this period 3.4.2.3. Low disturbance methods are to install the photovoltaic panels 3.4.2.4. A decommissioning and re-instatement plan is prepared and submitted prior to the panels being removed.	This comment is noted and the Applicant agrees with the conclusions. Should the DCO be granted, the Scheme will have a maximum operational life of 40 years (as secured by a requirement to the DCO) and the land will be returned to the landowners at the end of this period. The land use will no longer be under the control of the Applicant once this period is over and the land is returned to the landowner. A decommissioning and reinstatement plan will be prepared prior to the start of the decommissioning stage. A Framework Decommissioning Environmental Management Plan has been submitted with the DCO Application in Appendix 16E of the Environmental Statement [APP-125]. During construction, low disturbance methods will be used to install the photovoltaic panels. Module mounting structures will be rammed into the ground, with foundations reaching a maximum depth of 3.5m. Modules will be mounted with the PV panels by hand. Further details on the construction activities can be found in Section 3.6 of Chapter 3: Scheme Description of the Environmental Statement [APP-035].
NE-14	Noise and vibration /	Noise and light pollution	Further details are required to validate the conclusion of no adverse effect on the integrity of the site with regards impacts of	Both direct and indirect impacts to Chippenham Fen designated sites are addressed in Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] and

	Landscape and Visual		noise and light pollution for Chippenham Fen.	Appendix 8M Habitats Regulations Assessment - Report to Inform an Appropriate Assessment [APP-092], including noise and light impacts during construction. It is acknowledged that construction activities will occur within 100m of the Fen and therefore, specific mitigation measures have been embedded to prevent indirect impacts, such as those to mitigate potential impacts of construction noise and lighting (Table 8-9 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040]) and will be secured through the Construction Environmental Management Plan. A Framework CEMP is provided as Appendix 16c of the Environmental Statement [APP-123]. Table 8-9 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] sets out the potential impacts to these designated sites and explains and justifies why there will be no direct impacts. The same table also considers indirect impacts during construction, including noise and lighting, (Appendix 11D – Construction Noise Modelling [APP-112] and Figures 11-2 [APP-234] and 11-3 [APP-235] of the Environmental Statement). These assessments conclude that there will be no significant effects on the Chippenham Fen designated sites from construction. There are no pathways (e.g. habitat loss or disturbance to designated site features such as through noise, water quality, air quality, lighting or visual), during operation of the Scheme which could affect these statutory designated sites. There will be no lighting of the perimeter fence at Sunnica West Site B and maintenance visits will be undertaken as outlined in Framework Operation Environmental Management Plan [APP-126] and secured through the DCO.
NE-15	Ecology	Biodiversity habitats	Details of its construction, long-term management, maintenance and monitoring of biodiversity habitats should be agreed with Natural England and secured in the DCO.	The framework for management and monitoring of created habitats is outlined in Appendix 10I: Landscape and Ecology Management Plan of the Environmental Statement [APP-108]. The Landscape and Ecology Management Plan is intended to be further developed post-consent. Paragraph 1.1.4 states that <i>“this OLEMP provides a framework for achieving the ‘vision’ of</i>

				<i>the Landscaping Masterplan, as illustrated on Figures 1 to 6, in Annex A. Detailed landscaping and ecological management plans will be approved by the relevant local planning authority and will be required to be in accordance with this OLEMP".</i> Natural England will continue to be consulted with regard to the biodiversity habitats set out in the LEMP and this will be provided for in the next updated version of the draft DCO [APP-019].
NE-16	Ecology	Species surveys	Further information is required to determine the maximum number of Stone Curlew impacted by the proposed development as the surveys carried out did not meet the minimum recommended survey requirements for this species.	Detailed surveys to determine the number and distribution of breeding pairs of Stone Curlew were undertaken by the Applicant in 2019, 2020 and 2021 (see Appendix 8I - CONFIDENTIAL Annex D of the Environmental Statement [APP-086]), following the methodology, as set out in paragraphs 3.2.19-3.2.27 of Appendix 8I: Report on Surveys of Breeding Birds of the Environmental Statement [APP-085]. In 2019 surveys of the Order limits and a 500m buffer were undertaken following the RSPB's Stone-curlew monitoring protocol. These surveys confirmed the presence of a population of Stone-curlew using the Order limits and fields immediately adjacent to the Order limits. No further suitable nesting areas were found to be present beyond those observed as supporting Stone-curlew. Given that the presence of a breeding population of Stone-curlew was established in 2019, supported by information on historic nesting records from the RSPB, surveys in 2020 and 2021 concentrated on confirming the continued presence of Stone-curlew within the Order limits and previously identified suitable nesting areas immediately adjacent. Extended visits later into the summer and additional nocturnal surveys using playback techniques to elicit a response were deemed unnecessary and likely to cause undue disturbance to a relatively small and isolated population of Stone-curlew, especially as the presence of the species had already been established. Based on the available suitable habitat for nesting within the Study Area (Order limits and 500m buffer), historic data from RSPB and observations recorded during 2019, 2020 and 2021, the Applicant is confident that the Stone-curlew recorded between 2019-2021 represents an accurate account of

				the population present in this area and that the number of pairs used in the assessment is the maximum worst-case scenario. Irrespective of this, surveys of the entirety of the Study Area will be undertaken prior to commencement of any works on site, to provide an accurate picture of the location of Stone-curlew pairs prior to any potential disturbance arising during construction. Measures to mitigate construction disturbance to Stone-curlew are set out in the Framework CEMP [APP-123] and will be secured through the CEMP.
NE-17	Ecology	Offsetting habitat	Further information is required on the establishment, management and monitoring of offsetting habitat for Stone Curlew for the duration of the construction, operation and decommissioning of the proposed development.	Details of the habitat creation and management is provided in section 4 of the Offsetting Habitat Provision for Stone-Curlew Specification [APP-258] and section 1.8 of the Landscape and Ecology Management Plan [APP-108] . The areas embedded for offsetting utilise the species' current and historical distribution across the Order limits and have been designed and will be delivered following what has been successful with the other similar habitat and nesting plots around the Breckland area. Consultation will continue with Natural England to agree the offsetting specifications for Stone-Curlew pursuant to the DCO.
NE-18	Ecology	Habitat creation	Natural England request input into the detailed habitat creation strategy for the proposed grassland and wetland adjacent to Chippenham Fen with regard to design, habitat creation and establishment methodology, and long-term management. Chippenham Fen is managed by Natural England as a National Nature Reserve.	Natural England's request to input into the detailed habitat creation strategy for the proposed grassland and wetland adjacent to Chippenham Fen is noted. The Applicant is continuing to consult with Natural England, and other ecology stakeholders, to discuss and agree details of habitat creation and establishment methods, and long-term management.
NE-19	Ecology	Protected species and priority habitats	Further information is required on the provision and management of measures to offset impacts to other protected species and loss of priority habitats.	The framework for management and monitoring of created habitats is outlined in Appendix 10I: Landscape and Ecology Management Plan of the Environmental Statement [APP-108] . The Landscape and Ecology Management Plan is intended to be further developed post-consent. Paragraph 1.1.4 states that " <i>this OLEMP provides a framework for achieving the 'vision' of the</i>

				<i>Landscaping Masterplan, as illustrated on Figures 1 to 6, in Annex A. Detailed landscaping and ecological management plans will be approved by the relevant local planning authority and will be required to be in accordance with this OLEMP".</i> Natural England will continue to be consulted with regard to the provisions within the LEMP and this will be provided for in the next updated version of the draft DCO [APP-019].
NE-20	Ecology	Offsetting habitats	Further information is required on the status of offsetting habitats at and after decommissioning of the development including securing ongoing management if they are retained.	The Scheme will not remove landscape enhancements at the point of decommissioning and only the infrastructure elements of the Scheme would be removed, as set out in the Framework Decommissioning Environmental Management Plan [APP-125]. If after decommissioning, when the land is no longer under the control of the Applicant nor covered by this consent, a landowner decides to remove vegetation, this would be subject to applicable planning or licensing requirements as appropriate at that point in time. The development will have a maximum operational life of 40 years and the land will be returned to the landowners at the end of this period, following decommissioning. The management of the offsetting habitats after decommissioning will therefore no longer be under the control of the Applicant.
NE-21	Air Quality / Ecology	Air pollution	Devil's Dyke SAC and Rex Graham Reserve SAC: further assessment is required to rule out air pollution impacts on these sites from the project in combination with other plans and projects.	Devil's Dyke is over 4.7 km from the nearest affected route in the traffic model, and Rex Graham Reserve is 3.4km from the road network and will not be affected by the Scheme in terms of nitrogen deposition. Closer designated sites have been assessed and found not to be at risk from the Scheme (see Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] and Appendix 8M Habitats Regulations Assessment - Report to Inform an Appropriate Assessment [APP-092]).
NE-22	Ecology	Wildlife impact	Havacre Meadows and Deal Nook County Wildlife Site: it is not currently clear how impacts to this site will be avoided during	See response to RR-NE10.

			the construction of the grid connection route.	
NE-23	Ecology	Biodiversity Net gain	Calculations have been carried out using the Biodiversity Metric 3.0 but the calculation does not distinguish between mitigation for impacts to statutory designated sites, priority habitats and other mitigation for farmland birds, badger, scarce arable plants and other protected species which should be excluded from biodiversity net gain calculations using the metric.	The Biodiversity Net Gain Assessment [APP-259], using Defra's Biodiversity Metric 3.0, sets out the approach and evidence used in undertaking the calculations, along with adequate detail to interpret the results. The Scheme has been designed to maximise the use of the land within the Order limits for biodiversity, embedding the creation of habitats throughout. This has been done to avoid impacts, in many cases by creating better quality habitats than are already present, e.g., arable farmland will be replaced by diverse grasslands. Therefore, any measures to mitigate or offset the potential loss of existing habitats have been integrated into the Scheme design and it is not specifically a case that a certain area is to mitigate the impact for a particular designated site, habitat or species, e.g., undeveloped buffers are retained around designated sites to avoid impacts during construction, but these will be subject to habitat creation and appropriate management to enhance the value of designated sites. Equally, the creation of grassland in undeveloped areas where there may be other constraints, e.g., heritage, will benefit farmland birds, creating a permanent habitat that will increase nesting opportunities and nest productivity. Natural England's comments will be taken into consideration as part of an updated calculation of Biodiversity Net Gain which will provide the detail as requested for the calculations using the latest Biodiversity Net Gain metric 3.1. See also RR-NE 12 and RR-NE 85.
NE-24	Land use	Soil	In order to both retain the long-term potential of this land and to safeguard all soil resources as part of the overall sustainability of the whole development, it is important that the soil is able to retain as many of its many important functions and services (ecosystem services) as	For the operational life of the Scheme, the land will be managed as low input grassland. Year-round grass cover will protect the soil surface from detachment by wind and rain, cutting soil erosion. The very light soils found in this area can blow, a nuisance for neighbouring property as well as a loss of soil resource. Permanent green cover will also enhance rainfall infiltration of the surface, cutting runoff after heavy rain. The

			possible through careful soil management and appropriate soil use, with consideration on how any adverse impacts on soils can be avoided or minimised.	maintenance of a year-round crop cover and the suspension of cultivation will also enable the recovery of soil organic matter, further enhancing both topsoil resistance to erosion and rainfall infiltration. These benefits of the 40-year fallow contrast sharply with continued arable use with its attendant decline to low soil organic matter and exposure of very light textured soil to erosion. Refer to <i>Defra R&D Best Practice for Managing Soil Organic Matter (SOM) in Agriculture – SP08016</i> (Defra, 2008). Unlike arable land work, construction and decommissioning activities will be guided by a Soil Management Plan which will be agreed as part of the CEMP. It is intended that the matters to be covered by the SMP will be further updated in a revised Framework Construction Environmental Management Plan [APP-123] to be submitted at Deadline 2.
NE-25	Land use	Restoration	Doubtful and greater justification is required as to how the land will be restored back to its original quality post development after its 40-year operational life.	This will not be a hugely modified site requiring land restoration. Narrow steel piles will simply be drawn out of the soil using similar light plant as used to drive them in, e.g., a small vibration pile driver. <i>Defra R&D Evaluation of mineral sites restored to agriculture – LE0206</i> (Defra, 1994) demonstrates success of restoration of landfill sites back to agricultural land without loss of land quality. Removal of solar farm presents negligible risk to agricultural land quality when compared to landfill site stripping, excavation, landfill and eventual restoration. Decommissioning work will have an agreed Soil Management Plan (SMP). Most measures will be identical to the construction SMP, for instance the selection of appropriate plant and avoidance of soil handling and trafficking when the soil has wetted up to its plastic limit. Soil handling recommendations in the SMP will be a component of the DEMP as well as the CEMP, and apply to the respreading of soil over the relatively small extent of restored areas (switchgear compound and access tracks). Through the SMP measures, the functional capacity of the soil for agricultural production and environmental services

				(including hydrological services) will be retained both where it remains in place (below and between the solar panels) and where it is disturbed (topsoil stripping from access tracks and switchgear compound). Further details of the SMP will be provided in the updated Framework Construction Environmental Management Plan [APP-123] and Framework Decommissioning Environmental Management Plan [APP-125] which will be submitted at Deadline 2.
NE-26	Land use	Survey	The land surveyed by RAC within the Sunnica Order limits (approximately 2 ha) should have been resurveyed to provide a total survey density of 1 observation per hectare.	Part of the Order limits overlaps a previous application area for the adjoining sand and gravel quarry. The area within the Order limits was not included as part of the eventual quarry and has not been open cast. For the minerals application the minerals site was subject to an ALC assessment by the soil and agriculture consultancy RAC. The RAC survey density was approximately one sample point per two hectares, and was deemed appropriate for assessing the (permitted) minerals site application, and identifying soil units for stripping and restoration. Resurvey to bring the RAC survey area within the Order limits up to a density of one sample point per hectare would require one additional sample point. The area of overlap for the RAC survey inside the Order limits is small. Surrounding survey work both inside and outside the Order limits shows consistent ALC Grade 4 land. Confidence in the absence of any best and most versatile land is adequately provided by the existing RAC plan and it is considered that no additional survey work is required.
NE-27	Land use	Soil	The ALC survey data is incomplete - The Grid Connection routes were not considered as part of the assessment. An ALC survey should be undertaken along the routes of the proposed cabling to inform soil handling and to verify soil	An intrusive ALC assessment cannot easily be conducted on land not optioned to the developer; access is required to survey land. The cable route will not entail occupation of land for the duration of the development as with the solar farm. Agricultural land on the cable route can resume its productive agricultural use immediately following installation of the cable. Soils on the cable route can and should be assessed as part of the Soil Management Plan, to be approved as part of the Construction

			restoration to pre-construction agricultural land quality.	Environmental Management Plan. Such an approach has been standard practice for grid connections crossing agricultural land for the entirety of Daniel Baird's professional career dating back to 1992. This survey work will be appropriate to the narrow corridor of the cable route rather than the 100m grid spacing of a detailed ALC survey. The draft NPS EN-3 references the need to survey soils and land quality along the path of proposed underground cabling (Para 2.48.14). It should be noted that NPS EN-3 is a draft document that was published after the ALC survey work was undertaken for the Scheme. This survey work will be undertaken post consent in any event.
NE-28	Land use	Soil assessment	Where information on soil nutrient status and pH has not already been collected, this should also be carried out.	Nutrient status and lime requirement has not been collected as this does not influence the ALC grade, and therefore is not relevant to the required assessment.
NE-29	Land use	Soil assessment	Where pillars are fixed to concrete foundations, or pillars set in concrete are utilised (Table 3-2, Chapter 3: Scheme Description), the soil disturbance will be greater. This uncertainty in the methodology, should be reflected in the soil assessment.	Use of concrete foundation/pillar is confined to perimeter fencing and switchgear housing. The extent of soil disturbance for pillar/foundations is marginal within the solar farm. Fencing will also predominantly follow existing field boundaries further limiting any potential to interfere with future arable operations.
NE-30	Construction	Soil	We suggest a commitment is required to ensure low disturbance methods are used to install the solar panel infrastructure (i.e. steel piles with no use of concrete), in order to minimise soil disturbance and that this is secured in the DCO.	Solar PV will generally be mounted on steel piles driven into the ground, without use of concrete. The final methodology for installing the panels will depend specific micro-site conditions. The Schedule 1 of the draft DCO [APP-019] allows for the following methods: steel piles driven into the ground, a pillar attaching to a steel ground screw, pillars fixed to a concrete foundation sitting on the surface (a 'concrete shoe'), or a pillar set in concrete in a pre-made hole in the ground (micro piled). Concrete shoes would only be used in circumstances where they are necessary as a mitigation measure (e.g. archaeology) and there is no anticipated need for solar PV to use pillars set in below ground concrete – driven and screw type steel piles being cheaper and quicker to both install and remove. This control will be set out in the Construction Environmental Management Plan.

				The Soil Management Plan (SMP) will specify appropriate plant, e.g. tracked excavators and small pile drivers. In addition, the SMP will also contain provisions on monitoring soil moisture content. Grass cover will be established over the solar farm site following harvest of the last arable crops, further protecting the soil surface against any damage from construction and decommissioning work. A Soil Management Plan will be included within the updated Framework CEMP [APP-123] at Deadline 2 of the Examination.
NE-31	Land use	Restoration	We also suggest a commitment is required to ensure that at the end of the duration of consent (40 years), following decommissioning, the arable land is reverted to its current ALC grade and cropping regime	Return to the current cropping regime will be subject to environmental regulations and market conditions at that time, and will be a decision for the landowner. For instance, if water abstraction licence volumes are lower, farmers will not be able to maintain the current proportion of irrigation dependant crops in the rotation. The cropping regime is not subject to planning consent. Arable land could transition to low input grassland without the solar farm. Countryside Stewardship grants include an option for arable reversion to grassland with low fertiliser input (refer to: <i>SW7: Arable reversion to grassland with low fertiliser input</i> (Rural Payments Agency and Natural England, 2022). This pays the farmer £301 to £400 per hectare annually for agricultural land management, which is not substantially different to that of a solar farm. ALC Grade is independent of current agricultural land management. Therefore, the land within the solar farm will retain its current ALC grade through the operational phase of the solar farm and following decommissioning. Future cropping regime will of course be subject to the then current agri-environmental policy framework, and market conditions.
NE-32	Land use	Soils	The sensitivity of the light soils, according to Table 12-6, Chapter 12 should be very	Para 12.4.44 notes that the sensitivity criteria tables illustrate sensitivity scales. Table 12-6 within Chapter 12: Socio-

			low, however they are described as low in Paragraphs 12.8.28 and 12.8.79 of Chapter 12	economics and Land Use of the Environmental Statement [APP-044] provides illustrations for soil resources in terms of disturbance and soil consistence. Paragraph 12.8.79 considers the sensitivity of the soil within the Order limits to the full range and variation of likely activity, not just soil handling in isolation. For example, the bulk of the topsoil present at the site will not be handled, remaining in place through construction operation and decommissioning. This soil will however be subject to limited trafficking.
NE-33	Land use	Soil resource	The conclusion that there will be a moderate beneficial impact on the soil resource during operation should be supported by evidence (Paragraph 12.8.53, Chapter 12; and Paragraph 5.6.5, Appendix 12B).	Please refer to Defra R&D <i>Best Practice for Managing Soil Organic Matter (SOM) in Agriculture – SP08016</i> (Defra, 2008). Methods that enhance SOM are listed on page 1 of the summary report. These include introducing grass crops into arable rotations and converting tillage land to long term grassland. The Scheme is therefore expected to enhance SOM, leading to a noticeable beneficial impact across a large area.
NE-34	Land use	Soil disturbance	There is contradiction in the extent of soil disturbance.	No ground levelling will take place within the areas of solar panels. Pile drivers will provide level height of pile tops along a section of solar PV panels by varying pile driving depth. The landform is already predominantly level. Any localised ground levelling will be limited to that required within the extent of access tracks and switchgear compounds.
NE-35	Land use	Agricultural production	There would be a significant loss of agricultural production during the lifetime of the development which should be considered in the assessment.	Any loss of arable area is temporary, with livestock grazing able to continue through the operation of the solar power generation. Furthermore, the primary crops in the rotation for arable land are the irrigation supported crops (potato, sugar beet, carrot, onion). The area managed for these crops is dependent upon and limited by the water abstraction licence volumes. Suspending irrigation water use at the Sunnica site will free up abstraction volume for application elsewhere within the extensive aquifer, with an increase in irrigated cropping displacing the extent of unirrigated crops such as wheat. Therefore, the reduction in arable area will be predominantly unirrigated cereals (low

				yielding on this significantly drought limited land), with little or no reduction in the area managed for irrigated crops.
NE-36	Land use	Soil handling	The Burwell National Grid Substation Extension Site will undergo permanent development, therefore the soil stripped from the site should be re-used on site if possible, where soil handling and reuse should be described in the SMP.	The Soil Management Plan will cover beneficial end use for soil stripped from the marginal areas of permanent development. Further details of the Soil Management Plan will be provided in the updated Framework Construction Environmental Management Plan [APP-123] which will be submitted at Deadline 2 of the Examination.
NE-37	Construction	Soil movement	Clarification should be provided in the SMP on the extent of soil movement, storage and reuse across the site during construction, operation and decommissioning, and the assessment of effects (on agricultural land and soil resources) updated should the magnitude of effects alter as a result.	Soil movement to storage bunds will be limited to the marginal areas of access tracks and switchgear/battery storage housings, the extent of which will be mapped in the Soil Management Plan. No change in the extent of this marginal area is anticipated, and should such a change occur it will not be sufficient to change the Environmental Statement magnitude of effect for soil resources. A Soil Management Plan will also control the restoration of soil material to these marginal areas as part of decommissioning. There will be no soil movement as part of the site operation.
NE-38	Ecology	Habitat creation	We advise that habitat creation is tailored to the soil resource present on site, using data presented in Appendix 12B, avoiding the need for soil translocation and mixing as far as practicable.	This comment is noted. Habitat creation has been tailored to the prevailing soil types present within each site across the Order limits. As well as targeting biodiversity present in the local landscape, it will minimise the need to translocate and import soil.
NE-39	Land use	Soil specialist	We advise that if the development proceeds, the developer uses an appropriately experienced soil specialist to advise on, and supervise, soil handling, including identifying when soils are dry enough to be handled and how to make the best use of the different soils on site.	The Soil Management Plan will include appropriate qualifications and experience of a soil scientist to monitor compliance with the Soil Management Plan. Further details of the Soil Management Plan will be provided in the updated Framework Construction Environmental Management Plan [APP-123] which will be submitted at Deadline 2 of the Examination.

NE-40	Land use	CEMP/soil disturbances	The CEMP should aim to reduce impacts from soil disturbance, as no soil should be taken off site as per Paragraph 12.7.3, Chapter 12.	This comment is noted. The Construction Environmental Management Plan will include a Soil Management Plan which will be produced prior to construction, to be agreed as a condition of consent. This will include measures to manage soil disturbance and conserve the soil resource from the small area of topsoil stripped, as per Table 3-7 of Appendix 16C: Framework Construction Environmental Management Plan [APP-123] . It is intended that the matters to be covered by the Soil Management Plan will be further updated in a revised Framework Construction Environmental Management Plan [APP-123] to be submitted at Deadline 2 of the Examination.
NE-41	Land use/ Ecology	Habitat	Paragraph 3.8.6 contradicts Paragraph 12.11.16, Chapter 12, which states that the land within the site can be returned to arable management. Therefore, the Applicant should provide simple breakdowns of the areas of temporary development and permanent habitat creation / development and associated ALC Grade in the summary.	The Scheme will have a maximum operational life of 40 years and the land will be returned to the landowners at the end of this period, following decommissioning. The management of the offsetting habitats after decommissioning will therefore no longer be under the control of the Applicant following decommissioning. The habitat created could therefore be returned to arable management.
NE-42	Construction/ Operations	Soil stripping	There is no consideration for soil stripping and storage during construction and operation to facilitate restoration during decommissioning that would apply to limited areas of the Site.	All soil handling will be subject to a Soil Management Plan that will form part of the development Construction Environmental Management Plan (CEMP), Operation Environmental Management Plan (OEMP) and Decommissioning Environmental Management Plan (DEMP). A Framework CEMP is included in Appendix 16C of the Environmental Statement [APP-123]. A Framework OEMP is provided as Appendix 1F of the Environmental Statement [APP-126] and a Framework DEMP is provided as Appendix 16E [APP-125]. A Landscape and Ecology Management Plan is provided in Appendix 10I of the Environmental Statement [APP-108]. This outlines the management of soil and habitat during operation of the Scheme to manage and mitigate any potential environmental impacts.

NE-43	Construction	Soil stripping	The areas requiring topsoil stripping should be identified and location of soil storage presented in the SMP, including volumes and soil types.	Please see response RR-NE42. The areas which require topsoil to be stripped and stored arising from excavations will predominantly be for predominantly be the substations, BESS, compounds, cable trenches and tracks. It is not proposed for the solar PV or landscaping areas. The volumes of soil to be managed and the location of soil storage will be confirmed in the future geotechnical investigations and will be included in the Soil Management Plan submitted with the Construction Environmental Management Plan at detailed design. A Framework CEMP is included in Appendix 16C of the Environmental Statement [APP-123].
NE-44	Land use	Restoration	The CEMP and associated SMP needs to be clearer that the aim is for BMV agricultural land to be returned to its original quality and all soils to be suitable for the planned end use.	This comment is noted. The Framework Decommissioning Environmental Management Plan (Framework DEMP) [APP-125] includes the following mitigation measures: • Agricultural soils will be managed, preserved, retained and reinstated in accordance with Department for Environment, Food and Rural Affairs (DEFRA) guidance. Key mitigation measures from this guidance will be included in the DEMP. • The DEMP (and the Construction Environmental Management Plan) will include its own Soil Management Plan, providing guidance on handling of soil material, specific to the soil resource present. This will ensure that soils are suitably managed during decommissioning and all infrastructure removed from the land to ensure that no effects on agricultural practices and land use occur following decommissioning.
NE-45	Land use	Agricultural use	There should be commitments that this land will be returned to agricultural use at the end of operation life (maximum 40	Refer to NE-20.

			years) and the agricultural land quality retained as Subgrade 3a.	
NE-46	Ecology	Habitat clarify	Table 3-3: It is not clear in the DEMP, whether 'Habitats to be temporarily lost or damaged during decommissioning will be fully reinstated on a like-for-like basis at the same location on completion of the works' refers to habitat created during construction, or the original pre-construction habitats.	This comment in Table 3-3 of the Framework Decommissioning Environmental Management Plan [APP-125] refers to the habitats that are in place at the end of the Scheme's operation, prior to decommissioning. Any such habitats temporarily lost or damaged during decommissioning of the Scheme will be fully reinstated before the land is returned to the landowner, at which point the land use will no longer fall within the Applicant's control.
NE-47	Land use	Reinstatement	We suggest a requirement that a site reinstatement plan is prepared and submitted prior to panels being removed, with a commitment that the BMV land is returned to its former agricultural use at the end of its 40year operational life.	The Order limits will remain agricultural land in agricultural use through the operational life of the project. This land will be managed as low input pasture and grazed by sheep or other small livestock. Once decommissioned, the land will return to being managed by the landowners, the Applicant will have no further control of land management for this site. Future agricultural management decisions (as currently) will be made by the agricultural occupants and landowners, guided by economics and the agri-environmental restrictions and incentives in place at that time. It would not be appropriate now to attempt to define how agricultural land is managed several decades into the future. The temporary use of the Order limits for renewable energy generation will not place any impediment on the resumption of the current arable land use. ALC grade is not influenced by land use so BMV land is not degraded by being placed in long-term pasture. The Framework Decommissioning Environmental Management Plan [APP-125] provides requirements on decommissioning works that will avoid degradation of the agricultural land or the soil resource associated with it.

NE-48	Ecology	Stone Curlew	The scheme will have impacts on Stone Curlew, a ground nesting bird that lives in dry, open places with very short vegetation or bare / stony ground.	An assessment of the impacts on Stone Curlew is presented in Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] and Section 5.3 of the Habitats Regulations Assessment - Report to Inform an Appropriate Assessment [APP-092] .
NE-49	Ecology	Birds	The proposed development will directly impact the birds resulting in the loss of nesting and foraging habitat identified within the Order limits.	The assessment of the impacts of Stone-Curlew occurring outside the Breckland SPA is presented in Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] and Section 5.3 of the Habitats Regulations Assessment - Report to Inform an Appropriate Assessment [APP-092] . This describes the fluid distribution of Stone-Curlew within farming landscape of the Order limits and how the species is reliant on the cropping regime in any given year to provide suitable areas of fallow and spring-sown crops to be able to nest. As detailed in section 1.8 of the Landscape and Ecology Management Plan [APP-108] and Offsetting Habitat Provision for Stone-Curlew Specification [APP-258] , the Scheme has embedded sufficient areas within the Scheme design to offset any potential reduction in arable farmland, that may, in any given year, be used by Stone-Curlew and avoid a net reduction in breeding and foraging opportunities for the species.
NE-50	Ecology	Stone Curlew	Additional indirect impacts on Stone Curlew outside of the Order limits are likely due to the high sensitivity of Stone Curlews to disturbance.	Impacts to the Stone-Curlew population, including those within a zone of influence outside the Order limits (up to 500m from the Order limits) have been considered in Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] and Section 5.3 of the Habitats Regulations Assessment - Report to Inform an Appropriate Assessment [APP-092]. Surveys of the entirety of the Order limits and a 500m buffer (where suitable habitat is present) will be undertaken prior to commencement of any works on site, to provide an accurate picture of the location of Stone-curlew pairs prior to any potential disturbance arising during construction. This is considered a sufficient zone of influence for the Scheme. Measures to mitigate construction disturbance to Stone-curlew are set out in the Framework Construction Environmental Management Plan

				[APP-123] and will be secured through the detailed CEMP; and similarly in the operational phase through the Operation Environmental Management Plan. No additional indirect impacts are predicted.
NE-51	Ecology	Stone Curlew	Natural England's advice for developments that may directly or indirectly impact Stone Curlew is that a minimum of three years complete surveying is carried out, following the RSPBs Stone Curlew monitoring protocol, of all suitable habitat capable of supporting Stone Curlew where disturbance impacts may occur.	Detailed surveys to determine the number and distribution of breeding pairs of Stone Curlew were undertaken by the Applicant in 2019, 2020 and 2021 (see Appendix 8I - CONFIDENTIAL Annex D of the Environmental Statement [APP-086]), following the standard survey methodology for the species, as set out in paragraphs 3.2.19-3.2.27 of Appendix 8I: Report on Surveys of Breeding Birds of the Environmental Statement [APP-085]. In 2019 surveys of the Order limits and a 500m buffer were undertaken following the RSPBs Stone-curlew monitoring protocol. These surveys confirmed the presence of a population of Stone-curlew using the Order limits and fields immediately adjacent to the Order limits. No further suitable nesting areas were found to be present beyond those observed as supporting Stone-curlew. Given that the presence of a breeding population of Stone-curlew was established in 2019, supported by information on historic nesting records from the RSPB, surveys in 2020 and 2021 concentrated on confirming the continued presence of Stone-curlew within the Order limits and previously identified suitable nesting areas immediately adjacent. Extended visits later into the summer and additional nocturnal surveys using playback techniques to elicit a response, were deemed unnecessary and likely to cause undue disturbance to a relatively small and isolated population of Stone-curlew, especially as the presence of the species had already been established. Based on the available suitable habitat for nesting within the Study Area (Order limits and 500m buffer), historic data from RSPB and observations recorded during 2019, 2020 and 2021, the Applicant is confident that the Stone-curlew recorded between 2019-2021 represents an accurate account of the population present in this area and that

				the number of pairs used in the assessment is the maximum worst-case scenario.
NE-52	Ecology	Habitat assessment	In the absence of complete surveys, further assessment should be made of the maximum number of pairs that could be present and impacted by the project, based on the surveys carried out in addition to the extent of suitable habitat available outside of the complete survey area, on a precautionary worst-case basis.	See response to NE-51. The maximum number of pairs that could be present and impacted by the Scheme has been used in the assessment. This is considered to represent a precautionary worst-case basis.
NE-53	Ecology	Clarification re offsetting habitat	Natural England advises that we concur with the assessment conclusions but advises that additional clarification on the provision and management of offsetting habitat is required.	Details of the habitat creation and management is provided in section 4 of the Offsetting Habitat Provision for Stone-Curlew Specification [APP-258] and section 1.8 of the Landscape and Ecology Management Plan [APP-108] . The provision and management of offsetting habitats will continue to be discussed with Natural England, to reach a position of agreement.
NE-54	Ecology	Stone Curlew	The breeding bird surveys indicated a greater number and higher density of Stone Curlew pairs recorded at East Site B compared to East Site A but more offsetting habitat is proposed at Site A. Further clarification of this is requested.	As detailed in Appendix 8M Habitats Regulations Assessment - Report to Inform an Appropriate Assessment [APP-092] and the Offsetting Habitat Provision for Stone-Curlew Specification [APP-258] the proposals are to create a maximum of ten 2ha plots, with three in ECO1, three in ECO2, and four across ECO3. This is considered more than adequate to offset any net loss in breeding and foraging opportunities within the Order limits. The locations of offsetting areas have taken into account the species existing distribution, but also the design and construction elements of the Scheme (e.g., to minimise construction disturbance), the location of residential areas and the ability to be able to secure large continuous blocks of land to maximum delivery of habitat creation and nesting plot opportunities and allow efficient management. Indicative locations will be discussed with Natural England during Examination, but flexibility will be retained in the DCO to ensure that the final

				locations can react to ground conditions prevalent at the time of creation.
NE-55	Ecology	Stone Curlew	Landscape and Ecology Management Plan refer to land within parcels E12 and E13 providing opportunities for Stone Curlew mitigation and being managed for them. Further clarification is requested on whether these areas are included within the 108 hectares of offsetting habitat.	E12 and E13 are not included within the 108ha of offsetting land, however, they will be managed sensitively for Stone-Curlew, keeping a mosaic of grass heights with frequent areas of shorter sward, as it is yet to be shown whether Stone-Curlew will forage within and around the margins of PV arrays.
NE-56	Ecology	Stone Curlew	Sunnica East Parameter Plan 3-1 shows these areas as being covered by the solar PV array so it is unclear how these areas will be capable of supporting Stone Curlew. If some of the offsetting habitat at site B is proposed to be within and / or under the arrays it is unclear whether sufficient habitat will be provided at this site.	See response to NE-55.
NE-57	Ecology	Stone Curlew	Natural England's advice for siting of land for offsetting impacts to Stone Curlew includes a requirement that the habitat should not be within 1.5km of residential settlements, within 500m of any buildings or smaller roads and within 400m of any public right of way, permissive path or area used for recreation. As Stone Curlew have been observed nesting within the Order limits within these distances, the location of the offsetting habitat does not meet these criteria as it has been sited to replicate the conditions the birds are currently using.	This is correct. The areas embedded within the Scheme design for offsetting impacts on Stone-Curlew utilise the species' current and historical distribution across the Order limits. Therefore, since this replicates the conditions the birds are already utilising, it is considered a suitably robust approach informed by empirical information on the nesting behaviour of the specific Stone-Curlew pairs in question in this landscape.

NE-58	Ecology	Habitat disturbance	We are concerned that behaviour of walkers and dogs next to conservation grassland may create more disturbance compared to activities next to active arable fields and therefore that not all of the habitat proposed for Stone Curlew will be suitable for them to utilise.	Details of Stone Curlew offsetting is providing in Offsetting Habitat Provision for Stone-Curlew Specification [APP-258] and the Landscape and Ecology Management Plan [APP-108] , however, the Applicant acknowledges the request for further clarification regarding location of permissive paths. The locations of these have been sited away from core offsetting areas and incorporated using existing vegetation and roads to screen from areas to be used by Stone Curlew.
NE-59	Ecology	Habitat suitability	We therefore seek additional information on the area of habitat that will be functionally suitable for Stone Curlew and how disturbance will be minimised such as fencing, screening or other methods.	See response to NE-58.
NE-60	Ecology	Number of plots	Whilst we welcome that these would be provided for the life of the development, further clarification is required on why it is stated a "maximum" of ten 2ha nesting/foraging plots rather than a minimum. No details are also given as to where these will be located and whether these will be retained in the same location each year or will be rotated to different locations.	As detailed in Appendix 8M Habitats Regulations Assessment - Report to Inform an Appropriate Assessment [APP-092] and the Offsetting Habitat Provision for Stone-Curlew Specification [APP-258] the proposals are to create a maximum of ten 2 ha plots, with three in ECO1, three in ECO2, and four across ECO3. This is considered more than adequate to offset any net loss in breeding and foraging opportunities within the Order Limits. As a minimum, five plots will be created to offset the loss of potential nesting sites for the maximum number of pairs identified. Indicative locations will be discussed with Natural England during examination and post consent pursuant to an update to Requirement 10 which will be made in due course, but flexibility will be retained in the DCO to ensure that the final locations can react to ground conditions prevalent at the time of creation.
NE-61	Ecology	Offsetting land	Further details are required to determine how the offsetting land will be managed to ensure it is ecologically functional for Stone Curlew in advance of construction starting, and its ongoing management for the life of the development.	Details of creation and management are provided in Appendix 8M: Habitats Regulations Assessment - Report to Inform an Appropriate Assessment [APP-092] and the Offsetting Habitat Provision for Stone-Curlew Specification [APP-258] , however, the Applicant acknowledges the request for further clarification and will engage further with Natural England to provide suitable information.

NE-62	Ecology	Nutrient management plan	As it is likely that nutrient levels in former arable fields will be high, we request clarification in the form of a nutrient management plan of how suitable nutrient levels will be reached, ensuring that the offsetting habitat is fully ecologically established and functional for Stone Curlew in advance of any construction work starting on the solar energy farm.	The Applicant acknowledges the request for further clarification on nutrient management. This information will be provided within updates to the Landscape and Ecological Management Plan [APP-108] and the Offsetting Habitat Provision for Stone-Curlew Specification [APP-258] during Examination.
NE-63	Ecology	Habitat creation	Our comments in paragraph 4.1.6.11 above that we advise that habitat creation is tailored to the soil resource present on site, avoiding the need for soil translocation and mixing as far as practicable.	This comment is noted.
NE-64	Ecology	Grassland	There is contradictory information presented in Appendix 10I because in Paragraph 1.7.7 it is stated that East site B will be chalk, not acid, grassland.	This comment is noted and Natural England is correct that it should refer to acid rather than chalk grassland.
NE-65	Ecology	Grazing	It is unclear whether grazing is only proposed for non-breeding months (Table C1, Appendix 10I) or includes the breeding season (Paragraph 8.8.7, Chapter 8) and whether this applies for all areas of Works No.10. Further clarification is requested.	The Applicant acknowledges the request for further clarification on grazing management and further information will be provided to Natural England on the Applicant's seasonal grazing proposal in due course.
NE-66	Ecology	Management techniques	Mowing is not a recommended management technique during the Stone Curlew breeding season. Therefore, further clarification of this is required to determine how disturbance to Stone Curlews would be avoided.	Mowing is not proposed for areas supporting Stone Curlew during the breeding season.

NE-67	Construction	Phasing plan	Whilst we also welcome that construction will be phased so that areas within 500m of the new habitat provisions are developed outside the Stone Curlew breeding season of March to October no phasing plan has been provided. Details of the phasing of construction are required to demonstrate how 500m distances from Stone Curlew habitat will be maintained throughout the construction phase.	A Phasing Plan would be developed by the Principal Contractor taking into account the mitigation measures secured in the detailed Construction Environmental Management Plan and Landscape and Ecology Management Plan required to avoid significant impacts. As noted in the Framework CEMP [APP-123] , it will be a requirement that the Stone-Curlew nesting plots will be created in advance of construction commencing. The 500m offset will then need to be managed throughout construction.
NE-68	Ecology	CEMP provisions	Stone Curlew nest locations vary between and within breeding seasons depending on ground conditions and disturbance. There may therefore be nests outside of the areas of new Stone Curlew habitat during the construction phase, either within the Order limits or close to it. The CEMP must therefore include provisions for these circumstances, ensuring that no construction takes place within 500m of active nests both within and outside the Order limits.	This comment is noted and the Applicant is in agreement that no construction works associated with the Scheme (Sunnica Energy Farm) will take place within 500m of active nests both within and outside of the Order limits. Updated ecological surveys (including breeding bird surveys) will be undertaken prior to construction and appropriate measures will be detailed within the Construction Environmental Management Plan. A Framework CEMP is included in Appendix 16C of the Environmental Statement [APP-123].
NE-69	Operations	OEMP	The operational environmental management plan (OEMP) should apply for the duration of the life of the proposed development and must be secured in the DCO.	The Applicant agrees with this comment and this will be the case.
NE-70	Ecology	Monitoring	Request that the monitoring covers the whole extent of the Sunnica East sites and birds within 500m of it to determine the long-term impact of the energy farm on the behaviour of other birds within 500m of the site, and whether other nests	The Applicant acknowledges this comment and considers that the Framework Construction Environmental Management Plan [APP-123] provides for sufficient monitoring requirements that are proportionate to the likely significant effects of the Scheme.

			have been displaced from this buffer zone.	
NE-71	Ecology	Measures of success	It is currently unclear on what the measures of success are for the offsetting habitat. Natural England requests clarification in addition to contingency measures if these success measures are not met.	The Applicant acknowledges this comment and success will be measured by the continued presence of Stone-curlew in and around the Scheme and no net loss of nesting sites. The Scheme has embedded sufficient land to offset any potential impacts on Stone-curlew through loss of potential nesting habitat. The effectiveness of these offsetting lands will be monitored to allow any remedial action to be taken to ensure successful ongoing use by Stone-curlew. The Applicant considers no further contingency in the form of land outside of the Order limits is required and any changes needed to be undertaken in response to Stone-curlew interaction with the Scheme can be delivered within Order limits. Natural England will continue to be consulted with regard to the Landscape and Ecology Management Plan.
NE-72	Ecology	OEMP provisions	The OEMP should also include provisions for routine maintenance activities in the energy farm during the Stone Curlew nesting season. As Stone Curlews are unlikely to nest in the same location each year (or for different broods in the same year), workers engaged in maintenance work should liaise with monitoring staff beforehand to ensure operations are not carried out within 500m of active nest locations.	Paragraphs 5.3.21-5.3.23 of the Landscape and Ecology Management Plan [APP-108] consider operational disturbance from site staff during maintenance visits stating the following, <i>'The offsetting habitats have been embedded into the Scheme in areas where operational access will not be required. Irrespective of this all operational staff working within 500m of the offsetting areas will also be given a toolbox talk regarding the sensitivity of Stone Curlew and where possible, maintenance within 500m of the offsetting areas will be scheduled between November and February.'</i>
NE-73	Ecology	Lack of evidence	There is a lack of evidence in the public domain to ascertain whether Stone Curlew avoid nesting or foraging near solar panels.	This comment is noted.
NE-74	Ecology/ decommission	Stone-Curlew habitat	It is unclear whether or not the Stone Curlew habitat will be retained for the decommissioning period and thereafter.	The Scheme will have a maximum operational life of 40 years and the land will be returned to the landowners at the end of this period, following decommissioning. The Stone-Curlew habitat

			For decommissioning we require clarification of proposed mitigation measures, including the exclusion of works within 500m of nest sites.	will not be decommissioned by the Applicant. The management of the offsetting habitats after decommissioning will no longer be under the control of the Applicant. Mitigation measures associated with Stone-Curlew and specific biodiversity will be included within the Decommissioning Environmental Management Plan produced prior to decommissioning. Given that decommissioning is to be undertaken in at least 40 years' time, ecology surveys will be undertaken prior to decommissioning to ensure that the mitigation measures included within the Decommissioning Environmental Management Plan are suitable for the wildlife found to be present at that time. A Framework Decommissioning Environmental Management Plan is included as Appendix 16E of the Environmental Statement [APP-125].
NE-75	Noise and vibration	Noise pollution	Due to the proximity of the Order limits to Chippenham Fen we request further information to confirm the conclusion of no adverse effect on the integrity of the site with regards to impacts from noise pollution and light spill.	See response to NE-07 and NE-14.
NE-76	Noise and vibration	Noise and light spill contour	We request that the applicant provide noise and light spill contour maps and modelling data for sensitive habitats within Chippenham Fen, to validate the no adverse effect conclusions with regard to changes to baseline levels.	Operational noise contour maps are presented in Figure 11-4 of the Environmental Statement [APP-236]. These maps illustrate that operational noise is predicted to be less than 30 dB LAeq,T at Chippenham Fen. Also see response to NE-14. There will be no permanent lighting during the operational phase, as outlined in Chapter 3: Scheme Description [APP-035]. During winter months, mobile lighting towers with a power output of 8kVAs will be used to assist construction works. During operation, permanent lighting with motion sensors will be installed within the substations and BESS compounds, providing a maximum of 50 lux. Any night works required on the solar panels during operation will use mobile lighting towers. In

				addition, the Scheme will utilise infra-red cameras to avoid the need for permanent lighting at the Scheme boundary.
NE-77	Ecology	Lighting strategy	We recommend that details of an appropriate lighting strategy (aligned with Bat Conservation Trust guidance) are agreed with Natural England.	This comment is noted. Natural England will continue to be consulted with regard to the Landscape and Ecology Management Plan [APP-108].
NE-78	Ecology	Habitat creation strategy	Due to the location of these proposed habitats adjacent to Chippenham Fen, which is managed by Natural England as a National Nature Reserve, we would request input to the detailed habitat creation strategy with regard to design, habitat creation/establishment methodology and long-term management. All details of habitat creation and long-term management should be agreed with Natural England through the Environmental Management Plans and secured in the DCO.	Natural England's request to input into the detailed habitat creation strategy with regard to design, habitat creation/establishment methods and long-term management with respect to Chippenham Fen is noted. The Applicant is continuing to consult with Natural England, and other ecology stakeholders, to discuss and agree details of habitat creation and establishment methods, and long-term management. Natural England will continue to be consulted with regard to the Landscape and Ecology Management Plan [APP-108].
NE-79	Water resources	Hydrological impacts	Brackland Rough SSSI is downstream of Sunnica West Site B and further evidence is required that there will be no hydrological impacts to this site.	No hydrological and water quality impacts on Bracklands Rough SSSI are predicted by virtue of a lack of a pathway to the receptor and the mitigation proposed by the Scheme. Bracklands Rough is located approximately 350m northwards from Sunnica West B. The SSSI area is located to the east of the River Snail and is designated for its wet woodland habitats. The River Snail flows along the western boundary of the SSSI, but a review of the citation shows that the SSSI is not designated for any relevant riverine habitats directly. The hydrology of the SSSI will be complex and dependent on a number of factors including infiltrating and seeping surface water runoff from the shallow slope to the east, and groundwater levels, which may be influenced by flows in the River Snail

				(among many other local factors). However, during operation the surface water drainage strategy ensures the site drainage will mimic natural conditions and the Scheme will not affect flows along the River Snail and therefore will not affect the hydrology of the SSSI indirectly. During normal flows, there is also no pathway for pollutants that may be released from runoff from the construction or operation of the Scheme to affect the SSSI, as these would be confined to the River Snail. However, regardless of this, the Scheme has included mitigation measures to ensure that the River Snail itself is not polluted during construction or operation phases. Within Chapter 9: Flood Risk, Drainage and Water Resources of the Environmental Statement [APP-041] Paragraphs 9.8.79 to 9.8.93 relates to the assessment of potential construction impacts from Sunnica West Site B and paragraphs 9.8.121 to 9.8.135 for Grid Connection Route B to the River Snail. The assessment concludes there would be no significant impacts to either surface water or groundwater from Sunnica West B and Grid Connection Route B. Based on there being no significant impacts to surface water or groundwater from Sunnica West B and Grid Connection Route B, it is considered there would be no significant source of impacts to Brackland Rough SSSI which is located north of Sunnica West B. Relevant mitigation measures are discussed further below. During construction, a Construction Environmental Management Plan will be implemented in accordance with Requirement 14 of Schedule 2 of the draft DCO [APP-019]. A version of this plan has already been prepared and submitted with the application in the Environmental Statement at Appendix 16C Framework Construction Environmental Management Plan [APP-123]. It outlines the measures which need to be taken to prevent discharge of any contaminative substances during construction into controlled waters, including silts, oils and fuels, cementitious substances, etc.

				During operation, the surface water drainage strategy is designed to mimic natural conditions and includes SuDS to ensure water quality mitigation for any low level of contaminants in the surface water runoff. A SuDS Simple Index Method assessment concludes the provided mitigation is sufficient. Please refer to Chapter 9: Flood Risk, Drainage and Water Resources of the Environmental Statement [APP-041] for further details. Finally, online flood maps suggests that any flooding from the River Snail is to the west and away from the SSSI and this even under flood conditions there would not be a pathway to convey any chemical pollutants from the construction or operation of the Site to the SSSI. This is supported by analysis of lidar data that suggest that the ground immediately west of the River Snail is elevated preventing flood flows from entering the SSSI.
NE-80	Ecology	Bird species and wider briefings	We seek further clarification of measures to offset other bird species listed in Schedule 1 of the Wildlife and Countryside Act 1981 that will be impacted by this development (including Barn Owl, Hobby, Common Quail, Little Ringed Plover), along with impacts to the wider breeding and wintering bird assemblages to ensure no adverse effects on these species from the development.	With reference to Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040], important ecological features identified as part of the detailed baseline surveys, including breeding and wintering birds, are reported in Tables 8-4, 8-5, 8-6, 8-7 and 8-8, with an assessment of likely impacts and effects undertaken in Section 8.9. Section 8.8 sets out avoidance and mitigation measures for important ecological features, including breeding and wintering birds. The Scheme has been designed so that impacts upon habitats supporting breeding and wintering birds (comprising woodland, grassland and hedgerow) are avoided or reduced, where reasonably practicable, and compensated for where not, through the retention of existing habitat and the creation of replacement habitat. Throughout the Scheme, a range of new habitats will be provided including bare ground, grassland, hedgerow, tree and scrub planting, all of which will increase the value of the Site for breeding and wintering birds. Grassland will be provided adjacent to and beneath the solar panels to increase the diversity of flora, in comparison to existing intensive agriculture, and provide new habitat and niches to encourage other fauna

				such as birds and invertebrates. These grasslands areas and margins will benefit Barn Owl. A total of 99.3ha within Sunnica East Site A and 67.1ha within Sunnica East Site B and 87.4ha within Sunnica West Site A and 38.25ha within Sunnica West Site B will not be subject to development (as secured through the Works Plans) and these areas have been set aside within the Scheme design for creation of biodiverse habitats, as set out in the Environmental Statement at Appendix 10I Outline Landscape and Ecology Management Plan (OLEMP) [APP-108] . This will include the creation of permanent grasslands on current arable land. These grasslands will be suitable for a wide range of breeding and wintering farmland birds, e.g. Lapwing and Skylark. Areas have also been identified for the sowing of winter bird cover crops. Gaps in currently defunct hedges will be planted with suitable native species to improve habitat connectivity, for example, broad-leaved woodland within the Sites and linked to habitat beyond the Sites. New areas of tree planting around infrastructure will be provided to improve habitat connectivity as well as increase the area of hedge/woodland habitat on Site. Hedgerows and trees will be allowed to grow tall and wide to provide maximum benefits for biodiversity and this natural regeneration will encourage a mosaic of successional habitats, forming broad habitat corridors throughout the Scheme. There will be no loss of habitat or foraging areas for Hobby and Barn Owl as a result of the Scheme. It is accepted that the construction of the Scheme will result in the temporary loss of habitat for Quail (arable farmland) and Little Ringed Plover (temporary bare ground), however, given both species transitory breeding nature, along with the embedded habitat creation, the effect is not considered significant.

NE-81	Ecology	Impacts re different species	As different habitat management is required for different species it is unclear how potential adverse impacts will be avoided. We request that the applicant provides further information to clarify this point.	Details of management, maintenance and monitoring are set out in section 8.8 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] and section 1.8 of the Landscape and Ecology Management Plan [APP-108] .
NE-82	Ecology	Air Pollution	To the north of the Order limits Breckland SPA and Rex Graham Reserve SAC are located adjacent to the A11. To the south, Devil's Dyke SAC is located adjacent to the A14. These sites have qualifying features that are sensitive to air pollution. Both roads are expected to be on the Affected Road Network although a plan of this was not provided within the application documents.	Devil's Dyke is over 4.7 km from the nearest affected route in the traffic model, and Rex Graham Reserve is 3.4 km from the road network and will not be affected by the Scheme in terms of nitrogen deposition due to the distance from the affected road network. Closer designated sites have been assessed and found not to be at risk from the Scheme (see Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] and Appendix 8M Habitats Regulations Assessment - Report to Inform an Appropriate Assessment [APP-092]).
NE-83	Ecology	Appropriate Assessment and air quality	Report to Inform an Appropriate Assessment concludes for these sites that likely significant effects of habitat degradation and contamination will not impact on sensitive habitats and species and, therefore, they are screened out from Appropriate Assessment. Natural England advises that there is not currently sufficient evidence submitted to conclude there will be no likely significant effect on these sites from air pollution as a result of road vehicles during the construction phase, because no in-combination air quality assessment has been carried out. We advise the applicant to refer to our guidance document NEA00111 and to	NEA001 recommends that a habitat should be assessed where they are within 200m of the affected road network. " <i>Such proposals are likely to have no effect on sites at all and so do not need to be subject to assessment in-combination with other plans and Projects.</i> " As the designated sites are greater than 200m from the affected network, such an in-combination assessment has not been undertaken for this assessment.

			ensure an in-combination assessment is completed.	
NE-84	Ecology	Existing biodiversity	BNG is not a replacement for best ecological practice of following the avoid-mitigate-compensate hierarchy with respect to existing biodiversity. It does not replace existing environmental legislation or policy requirements including existing requirements for dealing with direct or indirect impacts on statutory designated sites, ancient woodland and other irreplaceable habitats. Offsetting for these should be secured in perpetuity.	The comment is noted, however, the Scheme has followed the mitigation hierarchy and sought to avoid impacts to priority habitats, where possible. The BNG outcomes have not been used to replace any other requirement. With reference to Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] , important ecological features identified as part of the detailed baseline surveys are reported in Tables 8-4, 8-5, 8-6, 8-7 and 8-8. Section 8.8 sets out avoidance and mitigation measures for important ecological features, with an assessment of likely impacts and effects undertaken in Section 8.9. No ancient woodland or other irreplaceable habitats will be affected by the Scheme.
NE-85	Ecology	Biodiversity Net Gain Assessment	Biodiversity Net Gain Assessment does not distinguish between offsetting habitat delivered for Stone Curlews, priority habitats and other mitigation for farmland birds, badger, scarce arable plants and other protected species which should be excluded from BNG calculations using the Biodiversity Metric v3.0. Further details are therefore required to be provided, including plans showing the location of habitat provided as these offsetting measures and habitat provided for BNG.	Natural England's comments will be taken into consideration as part of an updated calculation of Biodiversity Net Gain which will provide the detail as requested for the calculations using the latest Biodiversity Net Gain metric 3.1. The Scheme has been designed to maximise the use of the land within the Order Limits for biodiversity, embedding the creation of habitats throughout. This has been done to avoid impacts, in many cases by creating better quality habitats than are already present, e.g. arable farmland will be replaced by diverse grasslands. Therefore, any measures to mitigate or offset the potential loss of existing habitats have been integrated into the Scheme design and it is not specifically a case that a certain area is to mitigate the impact for a particular designated site, habitat or species, e.g. undeveloped buffers are retained around designated sites to avoid impacts during construction, but these will be subject to habitat creation and appropriate management to enhance the value of designated sites. Equally, the creation of grassland in undeveloped areas where there may be other constraints, e.g. heritage, will benefit farmland birds, creating a permanent habitat that will increase nesting opportunities and nest productivity.

NE-86	Ecology	Biodiversity Net Gain Assessment	The BNG Assessment should also demonstrate the effect of the decommissioning on the long-term impact on biodiversity.	Natural England's comments will be taken into consideration as part of an updated calculation of Biodiversity Net Gain which will provide the detail as requested for the calculations using the latest Biodiversity Net Gain metric 3.1. It is not possible to accurately predict the effect of decommissioning at this stage through the Biodiversity Net Gain metric. The Scheme will not remove landscape enhancements at the point of decommissioning and only the infrastructure elements of the Scheme would be removed, as set out in Appendix 16E Framework Decommissioning Environmental Management Plan [APP-125] . If after decommissioning, when the land is no longer under the control of the Applicant nor covered by this consent, a landowner decides to remove vegetation, this would be subject to applicable planning or licensing requirements as appropriate at that point in time.
NE-87	Construction	CEMP and habitat	The construction of the Scheme for the Grid Connection will utilise boring, micro-tunnelling or moling methods and as such, will not directly impact habitats within this CWS, through loss of habitat". It is unclear exactly how potential damage to the site will be avoided so a detailed plan should be included within the Construction Environmental Management Plan.	The cables within the cable route will be installed across areas of sensitive habitats and other identified obstacles through non-intrusive methods (boring, micro-tunnelling or moling methods), as opposed to intrusive open-cut trenching (which will be used to install the cables across other areas of the cable route that have not been identified to be sensitive). Non-intrusive methods involve drilling underground from a 'send' pit to a 'receive' pit. The send/receive pits will be excavated to facilitate the drilling methods at a suitable distance from the identified sensitive features to be crossed. The cables will be installed through drilling at a suitable depth to avoid any disturbance or impacts to the features that they are crossing. Havacre Meadows and Deal Nook CWS, including the River Kennett and its banks, are to be crossed using these non-intrusive methods. The send/receive pit for this crossing will be located at least 30 m away from the CWS, and the cables will be installed (drilled) at a depth of at least 2m below the bed of the River Kennett. This will avoid the need to cause any direct impact or disturbance to the CWS and River Kennett habitats.

				A full list of the features identified along the cable route that would be crossed using non-intrusive methods is provided within Chapter 3: Scheme Description of the Environmental Statement [APP-035] Table 3-3 and shown on Figure 3-23a of the Environmental Statement [APP-166]. Chapter 3: Scheme Description of the Environmental Statement [APP-035] also includes further details on the non-intrusive methods to be used at these locations to install the cable route.
NE-88	Transport and Access	Diversions	We welcome that temporary diversions of public rights of way during the construction phase will be put in place and monitored to ensure they are suitable and well maintained for use and that new permissive paths will be created for the life of the development. However, we are concerned that diversions are proposed of 1km and greater in length which will include routes also used by traffic.	In total there are eight PRoW which are required to be temporarily closed for a short-term period during the construction phase. New diversionary routes are not proposed as part of the Scheme as each closure is expected to be for a maximum of three weeks, which is expected to be a worst-case scenario. Instead users of temporarily closed PRoW would be re-directed onto the existing PRoW network during the closure. Each of the short-term temporary closure of the PRoW will occur at different stages, therefore, each will be impacted on separately at differing stages of the construction. Advanced notice will be provided of the PRoW closures. The new permissive paths are proposed to be in place for the duration of the operational phase of the Scheme.
NE-89	Operations	Monitoring and mitigation strategy	We advise that the DCO should include the requirement for the annual monitoring and mitigation strategy for the entire life of the project from start of construction to completion of decommissioning.	The Applicant considers that this is not required as Requirement 8(3) of the draft DCO [APP-019] requires the Landscape and Ecology Management Plan (LEMP) to be implemented as approved. Requirement 8(2)(b) requires that the LEMP includes details of how the landscaping and ecological measures will be maintained during the operational life of the authorised development. The framework for management and monitoring of created habitats is outlined in Appendix 10I, Outline Landscape and Ecology Management Plan (OLEMP) of the Environmental Statement [APP-108]. The OLEMP is intended to be further developed post-consent. Paragraph 1.1.4 states that <i>"this OLEMP provides a framework for achieving the 'vision' of the Landscaping Masterplan, as illustrated on Figures 1 to 6, in</i>

				<i>Annex A. Detailed landscaping and ecological management plans will be approved by the relevant local planning authority and will be required to be in accordance with this OLEMP”.</i> The Applicant acknowledges this comment and considers that the Framework Construction Environmental Management Plan [APP-123] in Appendix 16C of the Environmental Statement provides for sufficient monitoring requirements that are proportionate to the likely significant effects of the Scheme. The Scheme will not remove landscape enhancements at the point of decommissioning and only the infrastructure elements of the Scheme would be removed, as set out in Appendix 16E - Framework Decommissioning Environmental Management Plan [APP-125] of the Environmental Statement. If after decommissioning, when the land is no longer under the control of the Applicant nor covered by this consent, a land owner decides to remove vegetation, this would be subject to applicable planning or licensing requirements as appropriate at that point in time.
NE-90	Ecology	Biodiversity Net Gain	Natural England notes that the applicant's commitment to securing a minimum of 10% Biodiversity Net Gain is reflected in Schedule 2, Paragraph 8 of the draft DCO. Natural England therefore advises that this requirement should be secured by a suitably worded requirement in the DCO, if the project is approved, for a minimum period of the life of the development, including the decommissioning.	The Applicant considers that this is not required as Requirement 8(3) of the draft DCO [APP-019] requires the Landscape and Ecology Management Plan to be implemented as approved, and Requirement 8(2)(a) requires that the LEMP secures the 10% Biodiversity Net Gain 'during the operation of the authorised development'. Upon decommissioning (which is required after 40 years and which matches the agreements negotiated with landowners) the Applicant will no longer have control of the site and the landscape and ecological measures implemented on the land. The Applicant therefore cannot commit to the specific 10% Biodiversity Net Gain that will be secured for the Scheme will be maintained in perpetuity. The Applicant notes, however, that upon decommissioning, the impact to biodiversity value of the solar site will no longer be occurring.

NE-91	Other	Light spill	The DCO should contain a commitment for site lighting to minimise artificial light spill outside of the Order limits.	A commitment to minimising artificial light spill outside of the Order limits is the result of the mitigation measures secured in Appendix 16C - Framework Construction Environmental Management Plan [APP-123] (see for example paragraph 2.5.2(c)) and Appendix 16F Framework Operation Environmental Management Plan [APP-126] (see for example table 3-3), secured by Requirements 14 and 15 of the Draft Development Consent Order [APP-019] .
NE-92	Ecology	Stone Curlews	Natural England welcomes that the Draft DCO includes requirement 10: "1.) No part of Work Nos. 1A, 1B, 2A, 2B, 3A, 3B, 6A, 6B, 7A, 7B, 8A, 8B and 10 may commence until the undertaker has provided the offsetting habitat provision for stone curlews". However, we seek clarification as to why this requirement doesn't include Work Nos. 4 and 9.	The Requirement does not include Work No. 4 which covers the installation of the grid connection. A section of the grid connection passes through the Stone-curlew offsetting area in Sunnica East B and therefore, will be subject to temporary ground disturbance whilst the cables are laid. As a necessity, this will need to take place before the compensation area is created, to avoid disturbing it once it is created. These works will not effect the establishment of nesting plots or the creation of grassland in ECO 1, 2 and 3 (as shown in Appendix 10I - Outline Landscape and Ecology Management Plan [AAP-108] in advance of commencement of activities in Works Nos. 1A, 1B, 2A, 2B, 3A, 3B, 6A, 6B, 7A, 7B, 8A, 8B and 10. Any activities associated with Works No. 4 will be subject to the restrictions set out in Appendix 10I - Outline Landscape and Ecology Management Plan [AAP-108], avoiding disturbance to breeding Stone-curlew. Works No. 9, involves only works to streets to provide access to the solar sites and so is a sufficient distance and/or within residential areas, that disturbance to Stone-curlew will not occur.
NE-93	Ecology	Stone Curlew	We request a commitment to the retention of Stone Curlew and other biodiversity offsetting habitat as part of the decommissioning stage.	The Scheme will not remove Landscape enhancements at the point of decommissioning and only the infrastructure elements of the Scheme would be removed, as set out in Appendix 16E - Framework Decommissioning Environmental Management Plan [APP-125] . If after decommissioning, when the land is no longer under the control of the Applicant nor covered by this consent, a land owner decides to remove vegetation, this would be subject

				to applicable planning or licensing requirements as appropriate at that point in time.
NE-94	Water resources	Contamination	Part 4 Paragraph 14 states that "undertaker may use any watercourse or any public sewer or drain for the drainage of water". We require clarification that there will be no contamination of watercourses, hydrologically linked wildlife sites and associated species.	Article 14 of the Draft Development Consent Order (DCO) [APP-019] is a standard article in a DCO. Article 14 does not disapply the requirement to obtain permits from the Environment Agency where these would apply in relation to controlled waters. Paragraph 14 states under (3) that the undertaker must obtain consent, and (6) the undertaker must take such steps as are reasonably practicable to secure that any water discharged into a watercourse or public sewer or drain pursuant to this article is as free as may be practicable from gravel, soil or other solid substance, oil or matter in suspension. In addition to the secured powers in the DCO, Appendix 16C of the Environmental Statement contains a Framework Construction Environmental Management Plan [APP-123] that has been prepared and submitted with the Application, outlines the measures which need to be taken to prevent discharge of any contaminative substances during construction into controlled waters, including silts, oils and fuels, cementitious substances, etc. The implementation of a Framework Construction Environmental Management Plan is covered by Requirement 14 in Schedule 2 of the draft Development Consent Order [APP-019]. During Operation, the surface water drainage strategy is designed to mimic natural conditions. Annex F: Drainage Technical Note of Appendix 9C - Flood Risk Assessment Part 4 [APP-098], the proposed surface water drainage strategy is outlined. Paragraph 3.1.1 states the proposed surface water drainage strategy for the Scheme areas is to mimic the natural drainage conditions of the site as much as possible. The SuDS measures to be included within the drainage strategy will also ensure water quality mitigation for any low level of contaminants in the surface water runoff. A SuDS Simple Index Method assessment concludes the provided mitigation is sufficient. Please refer to Chapter 9: Flood Risk, Drainage and Water

				Resources of the Environmental Statement [APP-041] for further details. In addition, during operation, Annex F: Drainage Technical Note of the Flood Risk Assessment [APP-098] notes in paragraph 3.6.6 and Section 3.10 (Fire Water Runoff) that firefighting water, and its potential contaminants would be contained within a separate lagoon structure and removed from it via controlled methods (e.g. a tanker) if the water is polluted. Therefore, although an unlikely event, should a fire occur, runoff from cooling of adjacent structures (as no direct fire-fighting is proposed) will not drain into the surface water drainage network without prior testing to confirm it is clean water. If it is contaminated it will be tankered off-site for appropriate disposal at a licenced waste facility.
NE-95	Ecology	Ecological Surveys	Part 6 Paragraph 36 states that “the undertaker may fell or lop any tree or shrub near any part of the authorised development or cut back its roots, if it reasonably believes it to be necessary to do so”. We advise that any works on trees must include pre-commencement bat surveys, and that no works must precede until a licence is granted, if required.	Table 3-3 of Appendix 16C - Framework Construction Environmental Management Plan [APP-123] sets out the monitoring requirements for biodiversity prior to and during construction. It states that ‘A pre-construction site walkover will be undertaken in advance of mobilisation/any potential advance works to reconfirm the ecological baseline conditions and to identify any new ecological risks. Updated species surveys, including bats, great crested newt, breeding birds, otter, water vole and badger, will be completed as appropriate to re-confirm the status of protected species identified, to inform mitigation requirements and support protected species licence applications, if required by Natural England.’
NE-96	EIA	Impact pathway	We note that it is frequently stated within the Environmental Statement that there is “no impact pathway” to designated sites. In many instances this is incorrect and there is a pathway for impact, but proposed mitigation measures will avoid or reduce impacts to a level that can be considered not significant.	This is a general comment, and the Applicant cannot respond to this specifically. However, the Applicant is continuing to engage with Natural England and the specifics of this comment will be discussed during these conversations.

NE-97	EIA/ design	Environmental benefits	For additional information on delivering environmental benefits at solar energy farms we advise the applicant to refer to Natural England's document Solar parks: maximising environmental benefits - TIN10112, which provides a summary of advice about their siting, their potential impacts and mitigation requirements for the safeguarding of the natural environment and the BRE publication Biodiversity Guidance for Solar Developments.	This comment is noted, and the Scheme has incorporated the principals of the Natural England and BRE guidance into the design of the Scheme. For example, maximising the creation of floristically diverse grasslands, creating local priority habitats and re-enforcing and improving ecological connectivity across the landscape.

2.8 AS-014 National Highways

Applicant responses to AS-014

Applicant's Ref.	Theme	Issue	Summary of issue raised	Applicant's response
NH-01	Consultation	Ongoing engagement	No issues raised but want to be kept informed	This is noted.

3 Summary of Public and Organisations' Relevant Representations and the Applicant's Response

3.1 Introduction

- 3.1.1 The remaining RRs have been analysed and considered by the Applicant and are presented in this section according to the themes listed on the following pages.
- 3.1.2 The summaries of main issues raised in the RRs are not an exhaustive review or line by line repetition of the RRs received but are a broad summary of the main issues raised. The Applicant has provided the location of further information in the DCO Application which addresses the points raised in its response.
- 3.1.3 22 topics have been identified giving consideration to a wide breadth of issues raised. These topics are as follows:

Location;

Land Use;

Need;

Design (including all Scheme elements);

Consultation;

EIA Process;

Construction;

Operations;

Decommissioning;

Ecology;

Landscape and Visual Amenity;

Heritage;

Transport and Access;

Water Resources;

Human Health;

Glint and Glare;

Renewable Energy and Climate Change;

Economy;

Planning;

Noise and Vibration;

Compulsory acquisition and,

Other.

3.2 Location

3.2.1 683 individual comments were received in relation to location of the Scheme.

Applicant's responses to RRs relating to location

Parties	Issue	Summary of issue raised	Applicant's response
RR-0012, RR-0055, RR-0059, RR-0075, RR-0109, RR-0116, RR-0133, RR-0138, RR-0142, RR-0174, RR-0185, RR-0194, RR-0229, RR-0256, RR-0266, RR-0275, RR-0285, RR-0296, RR-0306, RR-0308, RR-0309, RR-0340, RR-0372, RR-0392, RR-0458, RR-0464, RR-0476, RR-0550, RR-0614, RR-0628, RR-0634, RR-0665, RR-0666, RR-0667, RR-0673, RR-0674, RR-0692, RR-0718, RR-0722, RR-0726, RR-0733, RR-0740, RR-0743, RR-0744, RR-0773, RR-0778, RR-0856, RR-0872, RR-0876, RR-0883, RR-0891, RR-0902, RR-0912, RR-0951, RR-0955, RR-0977, RR-1001, RR-1005, RR-1032, RR-1040, RR-1042, RR-1066, RR-1067, RR-1070, RR-1080, RR-1093, RR-1099, RR-1101, RR-1131, RR-1141, RR-1150, RR-1157, RR-	Alternative sites	The Scheme would be more suitably located on a brownfield site.	The Applicant has considered the potential for siting the Scheme, or part of the Scheme, on brownfield land as part of its alternative sites assessment, which is reported in Appendix 4A, Alternative Sites Assessment of the Environmental Statement [APP-054]. This concludes that no suitable brownfield land of a sufficient size or location has been identified which could be available to be included as part of the Scheme.

Parties	Issue	Summary of issue raised	Applicant's response
1186, RR-1188, RR-1194, RR-1207, RR-1221, RR-1246, RR-1257, RR-1258, RR-1288, RR-1302, RR-1313, RR-1315, RR-1326, RR-1335, RR-1359			
RR-0121, RR-0122, RR-0142, RR-0189, RR-0202, RR-0251, RR-0336, RR-0607, RR-0746, RR-0795, RR-0825, RR-0827, RR-0849, RR-0969, RR-0972, RR-0982, RR-1099, RR-1109, RR-1128, RR-1136, RR-1197, RR-1206, RR-1246	Alternative sites	Not enough information is presented on the information on the rationale for selecting the Scheme's location.	The Applicant has set out the rationale for selecting the site in detail in the Development Consent Order application. Section 2.7 of the Planning Statement Part 1 [APP-261] sets out the main reasons for why the land within the Order limits was selected and why it is a suitable location for a large-scale solar farm. Appendix 4A, Alternative Sites Assessment of the Environmental Statement [APP-054] , describes the step-by-step site selection process that has been undertaken by the Applicant for the Scheme.
RR-0014, RR-0055, RR-0057, RR-0059, RR-0060, RR-0073, RR-0098, RR-0111, RR-0131, RR-0164, RR-0173, RR-0176, RR-0177, RR-0183, RR-0187, RR-0188, RR-0194, RR-0195, RR-0197, RR-0201, RR-0204, RR-0241, RR-0242, RR-0247, RR-0250, RR-0269, RR-0272, RR-0289, RR-0298, RR-0309, RR-0318, RR-0326, RR-0336, RR-0355, RR-0339, RR-0344, RR-0345, RR-0348, RR-0395, RR-0428,	Alternative sites	Solar energy generation should be located on residential and commercial rooftops.	The Applicant agrees that solar panels should be located on residential and commercial rooftops. The Statement of Need [APP-260] explains why large-scale ground mounted solar developments, such as the Scheme, are needed in addition to other generation technologies and smaller scale developments, such as rooftop mounted solar panels. Smaller scale generation developments will not be sufficient to meet the Government's objectives and commitments for a secure, affordable and zero carbon energy system. The Planning Statement Part 1 [APP-261] explains that energy and planning policy supports the above, including at Section 6.2. In particular, Paragraph 6.2.15 of the Planning Statement [APP-261] explains that paragraph 3.3.13 of draft NPS EN-1 acknowledges the role that smaller scale developments play in helping to achieve the government's objectives and commitments for the energy system. However, it explains that smaller scale schemes alone will not be enough, stating that <i>"the government does not believe they will replace the</i>

Parties	Issue	Summary of issue raised	Applicant's response
RR-0429, RR-0448, RR-0458, RR-0461, RR-0473, RR-0476, RR-0500, RR-0506, RR-0516, RR-0519, RR-0520, RR-0527, RR-0528, RR-0529, RR-0530, RR-0541, RR-0548, RR-0550, RR-0559, RR-0566, RR-0580, RR-0581, RR-0592, RR-0610, RR-0629, RR-0630, RR-0650, RR-0651, RR-0655, RR-0675, RR-0676, RR-0678, RR-0690, RR-0691, RR-0711, RR-0715, RR-0718, RR-0722, RR-0726, RR-0728, RR-0733, RR-0743, RR-0756, RR-0793, RR-0804, RR-0837, RR-0842, RR-0854, RR-0856, RR-0858, RR-0861, RR-0863, RR-0902, RR-0910, RR-0919, RR-0946, RR-0964, RR-0971, RR-0978, RR-0980, RR-0982, RR-0984, RR-0996, RR-1026, RR-1027, RR-1032, RR-1035, RR-1036, RR-1038, RR-1058, RR-1063, RR-1077, RR-1083, RR-1087, RR-1169, RR-1093, RR-1096, RR-1101, RR-1122, RR-1125, RR-1130, RR-1131, RR-1132, RR-1160, RR-1186,			<i>need for new large-scale electricity infrastructure to meet our energy objectives”.</i> The Applicant therefore invites the Examining Authority to attribute substantial positive weight to the draft NPSs. In addition, Paragraph 3.3.14 of the current adopted NPS EN-1 goes on to set out that large-scale centralised electricity generating facilities have numerous economic and other benefits that are not offered by smaller scale developments, including the more efficient bulk transfer of power, which enables surplus generation capacity in one area to be used to cover shortfalls elsewhere.

Parties	Issue	Summary of issue raised	Applicant's response
RR-1188, RR-1194, RR-1225, RR-1233, RR-1234, RR-1246, RR-1276, RR-1288, RR-1302, RR-1310, RR-1311, RR-1315, RR-1321, RR-1341, RR-1346, RR-1350, RR-1352, RR-1360			
RR-0015, RR-0191, RR-0196, RR-0415, RR-0542, RR-0577, RR-0611, RR-0631, RR-0646, RR-0663, RR-0666, RR-0684, RR-0882, RR-1040, RR-1169, RR-1184, RR-1225	Alternative sites	The Scheme should be located on lower grade agricultural land.	96% of the land within Sunnica East Sites A and B and Sunnica West Sites A and B is classified grades 3b and 4. This is defined as lower grade agricultural land. The Scheme therefore is located on lower grade agricultural, as suggested by this comment. Figures 12-2 [APP-238] and 12-3 [APP-239] of the Environmental Statement, illustrate the ALC of the Order limits. An assessment of the agricultural land classification of the Order limits is reported in Appendix 12B 0 Soils and Agricultural Baseline Report of the Environmental Statement [APP-115]. Regarding the poorer quality land that forms the vast majority of the Order limits, NPS EN-1 paragraph 5.10.15 states that the decision maker "...<i>should give little weight to the loss of poorer quality agricultural land (in grades 3b, 4 and 5)</i>...". This is reaffirmed by paragraph 5.11.14 of draft NPS EN-1.
RR-1243, RR-1264, RR-1281	Alternative sites	The Scheme should be built on land owned by the Government.	The Applicant has set out the rationale for selecting the site in detail in the Development Consent Order application. Section 2.7 of the Planning Statement Part 1 [APP-261] sets out the main reasons for why the land within the Order limits was selected and why it is a suitable location for a large-scale solar farm. Appendix 4A Alternative Sites Assessment of the Environmental Statement [APP-054] , describes the step-by-step process that has been undertaken by the Applicant to confirm that the location of the Scheme is suitable for a large-scale solar farm.
RR-0189, RR-0773, RR-0778, RR-1108, RR-1207,	Alternative sites	The Scheme should be located on land next to motorways.	The Applicant has set out the rationale for selecting the site in detail in the Development Consent Order application. Section 2.7 of the Planning Statement Part 1 [APP-261] sets out the main reasons for why the land within

Parties	Issue	Summary of issue raised	Applicant's response
RR-1254, RR-1300, RR-1302, RR-1312			the Order limits was selected and why it is a suitable location for a large-scale solar farm. Appendix 4A, Alternative Sites Assessment (ASA) of the Environmental Statement [APP-054] , describes the step-by-step process that has been undertaken by the Applicant to confirm that the location of the Scheme is suitable for a large-scale solar farm. No suitable land adjacent to motorways has been identified as part of the ASA, however, parts of the Scheme are located adjacent to the A11 and A14 Trunk Roads.
RR-0005, RR-0014, RR-0019, RR-0041, RR-0042, RR-0075, RR-0540, RR-0542, RR-0563, RR-0576, RR-0590, RR-0607, RR-0830, RR-0840, RR-0842, RR-0886, RR-0912, RR-0952, RR-0970, RR-0974, RR-0985, RR-1054, RR-1108, RR-1129, RR-1349	Alternative sites	The Scheme should be built in a more remote location.	The Applicant has set out the rationale for selecting the site in detail in the Development Consent Order application. Section 2.7 of the Planning Statement Part 1 [APP-261] sets out the main reasons for why the land within the Order limits was selected and why it is a suitable location for a large-scale solar farm. Appendix 4A, Alternative Sites Assessment of the Environmental Statement [APP-054] , describes the step-by-step process that has been undertaken by the Applicant to confirm that the location of the Scheme is suitable for a large-scale solar farm. This includes the requirement for the Scheme to be located in sufficient proximity to the point of connection to the National Electricity Transmission System at Burwell Substation, and avoidance of urban areas.
RR-0057, RR-0098, RR-0180, RR-0196, RR-0201, RR-0204, RR-0339, RR-0348, RR-0351, RR-0355, RR-0377, RR-0471	Alternative sites	The Scheme should be located offshore.	The Applicant does not consider that commercial offshore solar energy generation has been demonstrated to be technically possible or economically viable. The Applicant has set out the rationale for selecting the site in detail in the Development Consent Order application. Section 2.7 of the Planning Statement Part 1 [APP-261] sets out the main reasons for why the land within the Order limits was selected and why it is a suitable location for a large-scale solar farm. Appendix 4A, Alternative Sites Assessment of the Environmental Statement [APP-054] , describes the step-by-step process that has been undertaken by the Applicant to confirm that the location of the Scheme is suitable for a large-scale solar farm. This includes the requirement for the Scheme to be located in sufficient proximity to the point of connection to the National Electricity Transmission System at Burwell Substation, and avoidance of urban areas.

Parties	Issue	Summary of issue raised	Applicant's response
RR-0189, RR-0972, RR-1027	Alternative sites	The commercial availability of sites has been given too much weight in locating the Scheme.	The Applicant has set out the rationale for selecting the site in detail in the Development Consent Order application. Section 2.7 of the Planning Statement Part 1 [APP-261] sets out the main reasons for why the land within the Order limits was selected and why it is a suitable location for a large-scale solar farm. Appendix 4A, Alternative Sites Assessment (ASA) of the Environmental Statement [APP-054] , describes the step-by-step process that has been undertaken by the Applicant to confirm that the location of the Scheme is suitable for a large-scale solar farm. Whilst willing land owners are an important factor for a deliverable scheme, the ASA considers environmental and planning designations, agricultural land classification, and proximity to built-up areas. In accordance with the law on compulsory acquisition of land Sunnica considers the availability of willing landowners is important to minimise the reliance on compulsory acquisition of land.
RR-0554, RR-0617, RR-0896, RR-0913	Alternative sites	The Scheme should be located somewhere sunnier.	As shown by Figure 4-1 of the Planning Statement Part 1 [APP-261] and Figure 7-1 of the Statement of Need [APP-262] , and explained in those two documents, the location of the Scheme is within one of the higher solar irradiation areas of the UK.
RR-0983, RR-1015	Experience	The applicant has no experience in the area.	The Applicant, Sunnica Ltd, is a joint venture between Tribus Energy and PS Renewables who are experienced developers of solar farms in the south of England. It is advised by consultants who are 'best in class' environmental, land referencing, land agency, consultation and public affairs, legal and technical specialists. Appendix B of the Funding Statement [APP-023] includes details of projects by Solaer Holding, which is the funder of Sunnica Ltd, and Environmental Statement Appendix 1C: Statement of Competence [APP-053] sets out details of the environmental expertise of the authors of the Environmental Statement.
RR-0161, RR-0169, RR-0857, RR-0878, RR-0882, RR-0889, RR-0901, RR-0911, RR-1103	Impact on local area	The Scheme will impact on rural lifestyles.	Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] acknowledges that there will be impacts on the landscape resulting from the construction, operation and decommissioning of the Scheme. Whilst new land uses will be introduced relating to the generation of low carbon electricity, grassland beneath solar panel arrays and associated with the substantial ecological mitigation areas across the Site will provide a

Parties	Issue	Summary of issue raised	Applicant's response
			continuation of rural land uses. Public rights of way will be maintained and enhanced through the introduction of permissive paths across the Site. Whilst there will be views of solar farm development from some of these routes, they will largely be screened or filtered by existing vegetation or proposed planting.
RR-0002, RR-0006, RR-0012, RR-0017, RR-0027, RR-0037, RR-0039, RR-0048, RR-0055, RR-0056, RR-0065, RR-0067, RR-0070, RR-0071, RR-0075, RR-0077, RR-0078, RR-0089, RR-0097, RR-0098, RR-0105, RR-0110, RR-0111, RR-0113, RR-0114, RR-0115, RR-0122, RR-0136, RR-0140, RR-0158, RR-0161, RR-0164, RR-0172, RR-0189, RR-0198, RR-0220, RR-0233, RR-0247, RR-0251, RR-0256, RR-0258, RR-0260, RR-0264, RR-0267, RR-0273, RR-0284, RR-0291, RR-0307, RR-0308, RR-0328, RR-0445, RR-0450, RR-0465, RR-0488, RR-0502, RR-0505, RR-0506, RR-0509, RR-0514, RR-0515, RR-0518, RR-0523, RR-0533, RR-0538, RR-0540, RR-0546, RR-0547, RR-0555, RR-0563, RR-0568, RR-0576, RR-0584, RR-0600, RR-0601, RR-0604,	Site selection	The Scheme comes too close to residential properties.	The assessment of landscape and visual effects presented in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] acknowledges that there will be some adverse effects on residential visual receptors, but that by year 15 of operation these would not be significant. It also concludes that, due to the distance between the various parts of the Scheme, none of the identified visual receptors would have views across the Scheme in its entirety. No combined effects are reported for residential visual receptors. The Scheme also incorporates the provision of offsets/buffer zones from existing development and the Applicant considers that the mitigation provided is appropriate to mitigate impacts to residential properties.

Parties	Issue	Summary of issue raised	Applicant's response
RR-0607, RR-0610, RR-0611, RR-0613, RR-0627, RR-0631, RR-0657, RR-0661, RR-0663, RR-0666, RR-0678, RR-0689, RR-0710, RR-0711, RR-0714, RR-0720, RR-0743, RR-0754, RR-0758, RR-0773, RR-0774, RR-0781, RR-0781, RR-0784, RR-0789, RR-0795, RR-0805, RR-0810, RR-0814, RR-0854, RR-0858, RR-0879, RR-0886, RR-0893, RR-0900, RR-0903, RR-0906, RR-0912, RR-0946, RR-0952, RR-0956, RR-0961, RR-0968, RR-0970, RR-0972, RR-0975, RR-0983, RR-0997, RR-1015, RR-1035, RR-1040, RR-1053, RR-1054, RR-1064, RR-1065, RR-1070, RR-1076, RR-1086, RR-1090, RR-1122, RR-1124, RR-1131, RR-1144, RR-1157, RR-1159, RR-1162, RR-1185, RR-1191, RR-1196, RR-1197, RR-1235, RR-1242, RR-1250, RR-1252, RR-1253, RR-1254, RR-1260, RR-1264, RR-1269, RR-1277, RR-1285, RR-1295, RR-1306, RR-1315, RR-1328,			

Parties	Issue	Summary of issue raised	Applicant's response
RR-1349, RR-1354, RR-1359, RR-1360			
RR-0539, RR-0838, RR-0854	Site selection	The BESS is located too close to main roads.	The distances from BESS to main roads will be a minimum of: Sunnica West: • 450m from the A11. • 550m from La Hogue road. Sunnica East A: • 430m from Beck Road. Sunnica East B: • 40m from Elms Road. At these distances, the BESS does not pose a safety risk to roads or road users.
RR-0331, RR-0580, RR-0840, RR-0996, RR-1062	Site selection	The area has already taken its 'fair share' of supply infrastructure and electricity production.	The Scheme is a new solar energy farm proposal that would deliver electricity to the National Electricity Transmission System. Section 7.6 of the Statement of Need [APP-260] expands on the Government's view that large-scale, centralised electricity generating facilities which are connected to the high voltage transmission system are and will remain important in the UK because they enable the pooling of both generation and demand, which in turn offers a number of economic and other benefits, such as more efficient bulk transfer of power and enabling surplus generation capacity in one area to be used to cover shortfalls elsewhere. Section 6.4 of the Statement of Need [APP-260] covers site assessment and selection for large-scale solar in the UK. Given the overwhelming and urgent need for solar as set out in the Statement of Need [APP-260], suitable locations must be found for solar development. In order to meet the significant

Parties	Issue	Summary of issue raised	Applicant's response
			capacity growth projections, it will be necessary to develop all sites which have been identified and assessed as suitable. The cumulative impacts from the Scheme in combination with other schemes, including solar farms, in the area have been considered for all environmental disciplines. These assessments are presented within each of the technical chapters in the Environmental Statement (Chapters 6 to 16, [APP-038 to APP-048]). No significant cumulative effects with other developments (including the nearby solar developments) have been identified during the Scheme's operation.
RR-0516, RR-0548, RR-0863, RR-0884, RR-0889, RR-1112	Suitability of location	BESS has never been built at this scale so close to people before.	The Applicant has prepared the following documents: • Chapter 14: Air Quality of the Environmental Statement [APP-046]; • Appendix 16D: Unplanned Atmospheric Emissions from Battery Energy Storage Systems (BESS) of the Environmental Statement [APP-124]; and • Outline Battery Fire Safety Management Plan [APP-267]. The Outline Battery Fire Safety Management Plan [APP-267] provides a comprehensive review of the life safety and property protection fire safety requirements of the BESS at Sunnica East Site A, Sunnica East Site B and Sunnica West Site A. With the measures outlined in the Outline Battery Fire Safety Management Plan [APP-267] the Scheme does not give rise to a significant fire risk and any remaining risk that does exist can be addressed by ensuring that the Scheme is constructed, operated and decommissioned in accordance with those measures. These documents have considered the nearest receptors in all directions (250m away). These are considered to represent a worse case in comparison to other receptors located further away. Two locations that have been considered are the Pines Primary School in Red Lodge, and Brookside Stud. Both locations can be seen in Figure A2 of Appendix 16D: Unplanned Atmospheric Emissions from Battery Energy Storage Systems (BESS) of the

Parties	Issue	Summary of issue raised	Applicant's response
			Environmental Statement [APP-124]. All off-site receptors are located far enough from the BESS site that a measurable change of pollutants would not be able to occur with the level of dilution demonstrated to occur over this distance, for the scale of BESS proposed. Source concentrations would be diluted to 1/1000th of the source concentration (a dilution factor of 0.001) under 90% of the meteorological conditions likely to occur at the site, within 50m or less for all wind directions. Assuming the unlikely scenario that there is a 5-rack fire at the BESS before fire control measures bring the fire under control, emissions of Hydrogen Fluoride (HF) over time periods of 10 minutes, 1 hour or up to 6 hours would be below the Acute Exposure Guideline Level (AEGL-1) value at locations within 100 m of the fire (and by definition at lower concentrations further afield due to dispersion of pollutants). In most instances the AEGL-1 value would be achieved within the Order limits itself and in all cases in a shorter distance than that to the nearest sensitive receptors.
RR-0129, RR-0161	Suitability of location	The Scheme is located too far from the Burwell National Grid Substation.	The Applicant has set out the rationale for selecting the site in detail in the Development Consent Order application. Section 2.7 of the Planning Statement Part 1 [APP-261] sets out the main reasons for why the land within the Order limits was selected and why it is a suitable location for a large-scale solar farm. Appendix 4A: Alternative Sites Assessment of the Environmental Statement [APP-054] describes the step-by-step process that has been undertaken by the Applicant to confirm that the location of the Scheme is suitable for a large-scale solar farm. This includes the requirement for the Scheme to be located in sufficient proximity to the point of connection to the National Electricity Transmission System at Burwell Substation, and avoidance of urban areas. The Scheme has been designed in such a way as to maximise the use of its grid connection. This accounts for potential energy loss and is industry standard practice. Having considered the potential loss of energy during transmission, the Applicant continues to consider that the Scheme is viable.

Parties	Issue	Summary of issue raised	Applicant's response
RR-0319, RR-0866, RR-0996	Suitability of location	The location of the Scheme is well-suited to the generation of solar energy.	The Applicant agrees with this statement.
RR-0376, RR-0453, RR-0996, RR-1074	Suitability of location	The Scheme is too close to an existing solar farm near Burwell.	The solar PV sites are located approximately 5km east of the existing solar farm to the north of Burwell. The cable route for the Scheme connecting the solar PV sites with the Burwell National Grid Substation Extension will run close to the east of the existing solar farm, however these cables will be buried underground once installed. The cumulative impacts from the Scheme in combination with other schemes in the area, including solar farms have been considered for all environmental disciplines. These assessments are presented within each of the technical chapters in the Environmental Statement (Chapters 6 to 16, [APP-038 to APP-048]). No significant cumulative effects with other developments (including the nearby solar developments) have been identified during the Scheme's operation.
RR-0002, RR-0006, RR-0012, RR-0017, RR-0018, RR-0026, RR-0037, RR-0039, RR-0040, RR-0048, RR-0055, RR-0056, RR-0071, RR-0075, RR-0077, RR-0078, RR-0097, RR-0098, RR-0105, RR-0110, RR-0111, RR-0113, RR-0114, RR-0115, RR-0122, RR-0136, RR-0140, RR-0158, RR-0161, RR-0164, RR-0172, RR-0189, RR-0198, RR-0220, RR-0233, RR-0247, RR-0251, RR-0256, RR-0258, RR-0260, RR-0264, RR-0267, RR-	Suitability of location	The Scheme is located too close to settlement boundaries, including Isleham.	It is assumed that the environmental effects most applicable to this comment relate to landscape and visual and noise effects. Throughout the design process, the design has evolved to take into account the Landscape and Visual Impact Assessment Design Principles (set out in Chapter 10: Landscape and Visual of the Environmental Statement [APP-042]) to avoid and minimise effects on local residents. The nearest solar PV area is marked as E05 on Figure 3-1 of the Environmental Statement [APP-135] and has been set back by approximately 500m from the nearest residential properties in Isleham. No noise effects are anticipated for these residents during operation.

Parties	Issue	Summary of issue raised	Applicant's response
0273, RR-0284, RR-0291, RR-0293, RR-0307, RR-0308, RR-0327, RR-0328, RR-0334, RR-0445, RR-0450, RR-0465, RR-0488, RR-0502, RR-0505, RR-0506, RR-0509, RR-0514, RR-0515, RR-0518, RR-0523, RR-0533, RR-0538, RR-0540, RR-0546, RR-0547, RR-0555, RR-0563, RR-0568, RR-0576, RR-0584, RR-0600, RR-0601, RR-0604, RR-0607, RR-0610, RR-0611, RR-0613, RR-0627, RR-0631, RR-0657, RR-0661, RR-0663, RR-0666, RR-0678, RR-0689, RR-0710, RR-0711, RR-0714, RR-0720, RR-0743, RR-0754, RR-0758, RR-0773, RR-0774, RR-0781, RR-0784, RR-0789, RR-0795, RR-0805, RR-0810, RR-0814, RR-0854, RR-0858, RR-0879, RR-0886, RR-0893, RR-0900, RR-0903, RR-0906, RR-0912, RR-0946, RR-0952, RR-0956, RR-0961, RR-0968, RR-0970, RR-0972, RR-0975, RR-0983, RR-0997, RR-1015, RR-1035, RR-1040, RR-1053, RR-			

Parties	Issue	Summary of issue raised	Applicant's response
1054, RR-1064, RR-1065, RR-1070, RR-1076, RR-1086, RR-1090, RR-1108, RR-1122, RR-1124, RR-1131, RR-1144, RR-1157, RR-1159, RR-1162, RR-1185, RR-1191, RR-1196, RR-1197, RR-1235, RR-1242, RR-1250, RR-1252, RR-1253, RR-1254, RR-1260, RR-1264, RR-1269, RR-1277, RR-1285, RR-1295, RR-1306, RR-1315, RR-1328, RR-1349, RR-1354, RR-1359, RR-1360			
RR-0164	Suitability of location	The Scheme is too close to RAF Mildenhall and RAF Lakenheath.	The proximity of RAF Mildenhall and RAF Lakenheath to the Scheme has been considered and assessed as part of the Glint and Glare Assessment presented in Appendix 16A of the Environmental Statement [APP-121] and summarised in Chapter 16: Other Environmental Topics of the Environmental Statement [APP-048]. RAF Mildenhall and RAF Lakenheath are located approximately 2.5km and 10km to the north-east of the Scheme, respectively. RAF Lakenheath was assessed and considered to be too far away from the Scheme and the orientation of the runway would not result in any glint and glare impacts. Reflections have been assessed to not be geometrically possible from the PV panels within the Scheme to the runway at RAF Mildenhall, due to the orientation of the runway and the approach of aircraft to the aerodrome. In its relevant representation, the Ministry of Defence (MOD) stated that: <i>"The MOD has reviewed the proposals and the associated documentation from an</i>

Parties	Issue	Summary of issue raised	Applicant's response
			<i>air safety safeguarding perspective and can confirm, after performing the appropriate technical assessments, that we have no objections to raise at this time.</i> The MOD will continue to be consulted as an interested party during the Examination process.
RR-0561, RR-0615, RR-0754, RR-0810	Suitability of location	The Scheme is too close to land used for training horses.	Horse training facilities have been considered and assessed as part of the EIA for various environmental topics. Consultation has been undertaken with the local horse training facility groups. In order to minimise the effects from construction on horse training facilities, particularly the Snailwell Gallops, construction work will start no earlier than 10am in W03, EC05 and W04, in order to avoid the peak training times at the gallops. Horse training facilities within 1km of the Order limits have been assessed as part of the Glint and Glare Assessment presented in Appendix 16A of the Environmental Statement [APP-121] and summarised in Chapter 16: Other Environmental Topics of the Environmental Statement [APP-048]. Sample receptor points were taken at the six identified facilities: a. Snailwell Gallops b. British Racing School c. Limekins Gallops d. Godolphin Stables e. Bury Hill Gallops f. Long Hill Gallops The Glint and Glare Assessment concluded that reflections from the PV panels to the receptors during operation will either not be geometrically possible or will be sufficiently screened by existing vegetation and landform and the proposed planting for the Scheme illustrated in Figures 3-1 [APP-135] and 3-2 [APP-136] of the Environmental Statement and described in the Appendix 10I of the Environmental Statement [APP-108].

Parties	Issue	Summary of issue raised	Applicant's response
RR-0550	Suitability of location	A solar microclimate will be positioned close to a major gas pipeline.	It is understood that the gas pipeline referred to in this comment is located across Sunnica East Site B. Consultation has been undertaken with Cadent Gas and British Gas to inform the design of the Scheme as well as ensuring safe working methods and checks prior to the trial trenching that was undertaken in early 2021. An easement corridor of 24m has been left between the panels in the location of the gas pipeline in order to ensure that safe access for maintenance can be undertaken. No infrastructure is proposed to be sited directly over the gas pipeline. The position of the gas undertakers is also protected through the protective provisions included in the Development Consent Order which secures the clearance distances from the gas pipeline.

3.3 Land Use

3.3.1 988 individual comments were received in relation to land use.

Applicant's response to RRs relating to land use

Parties	Issue	Summary of issue raised	Applicant's response
RR-0252, RR-0319, RR-0582, RR-0811, RR-1057	Alternative land uses	Several hundred acres of land proposed for the Scheme have been used for growing maize for biodigesters. This is a more efficient use of the land.	The Applicant respectfully disagrees. Solar PV produces more kWh/ha than growing crops for anaerobic digesters (Geyer, R et al: Spatially Explicit Life Cycle Assessment of Sun-to-Wheels Transportation Pathways in the US (<i>Environ. Sci. Technol.</i> , 2013, 47 (2), pp 1170–1176)). In addition, it enables a recovery of soil health depleted by arable production and provides grazing for livestock.

Parties	Issue	Summary of issue raised	Applicant's response
RR-0001, RR-0003, RR-0007, RR-0008, RR-0009, RR-0012, RR-0017, RR-0018, RR-0024, RR-0027, RR-0030, RR-0035, RR-0036, RR-0037, RR-0038, RR-0039, RR-0040, RR-0042, RR-0043, RR-0044, RR-0045, RR-0046, RR-0047, RR-0048, RR-0049, RR-0051, RR-0052, RR-0053, RR-0055, RR-0056, RR-0057, RR-0059, RR-0061, RR-0063, RR-0064, RR-0065, RR-0067, RR-0069, RR-0070, RR-0075, RR-0076, RR-0077, RR-0078, RR-0079, RR-0081, RR-0083, RR-0084, RR-0085, RR-0086, RR-0087, RR-0088, RR-0089, RR-0090, RR-0092, RR-0095, RR-0097, RR-0098, RR-0099, RR-0100, RR-0101, RR-0105, RR-0106, RR-0107, RR-0108, RR-0109, RR-0110, RR-0111, RR-0114, RR-0116, RR-0117, RR-0119, RR-0120, RR-0123, RR-0124, RR-0127, RR-0129, RR-0132, RR-0133, RR-0134, RR-0135, RR-0137, RR-0138, RR-0140, RR-0142, RR-0143,	Agricultural land	Concern about the loss of agricultural land as a result of the Scheme, particularly given that this could challenge the UK's ability to be self-sufficient in terms of food production.	The Applicant is not aware of any policy which sets out that food production should be prioritised over renewable energy generation infrastructure. The Applicant's Response to Procedural Decision Dated 28 July 2022 was issued to the ExA on 5 August 2022. At paragraphs 4 to 11 it sets out the Applicant's position on food security. The Energy NPSs, draft Energy NPSs and the NPPF do not make reference to food security in relation to the determination of applications for energy generation schemes. This is a conscious decision by Government. Further, NPS EN-1 and draft NPS EN-1 set out that energy is essential to our ability to produce and transport food, stating at paragraphs 3.2.1 and 2.3.1, respectively, that: <i>"Energy underpins almost every aspect of our way of life. It enables us to heat and light our homes; to produce and transport food..."</i>. As is reported in the Application (see Table 12.20 of Chapter 12: Socio-Economics and Land Use of the Environmental Statement [APP-044]), over 96% of the land within Sunnica East Sites A and B and Sunnica West Sites A and B is classified as grades 3b, 4 or not in agricultural use. This means that it is lower quality land, not classified as BMVL. Lower quality agricultural land (in ALC grades 3b, 4 and 5) does not benefit from the same protection as BMVL, with paragraph 5.10.15 of NPS EN1 and paragraph 5.11.14 of Draft NPS EN-1 setting out that in deciding DCO applications, little weight should be given to the loss of poorer quality agricultural land. The use of the remaining 4% which comprises BMVL is justified by other sustainability considerations. These include the fact that much of that land represents small pockets of BMVL surrounded by lower grade land, and it would not be practicable to exclude it from the Scheme without also excluding larger areas of lower grade land. In addition, the Grade 3a land in the eastern parcel of Sunnica West is highly suitable and productive for solar generation given its south facing orientation.

Parties	Issue	Summary of issue raised	Applicant's response
RR-0146, RR-0155, RR-0157, RR-0158, RR-0161, RR-0162, RR-0163, RR-0164, RR-0165, RR-0166, RR-0167, RR-0169, RR-0170, RR-0171, RR-0172, RR-0174, RR-0175, RR-0176, RR-0177, RR-0178, RR-0180, RR-0181, RR-0183, RR-0184, RR-0186, RR-0187, RR-0188, RR-0189, RR-0190, RR-0191, RR-0192, RR-0193, RR-0194, RR-0195, RR-0196, RR-0197, RR-0198, RR-0200, RR-0201, RR-0202, RR-0204, RR-0206, RR-0211, RR-0215, RR-0216, RR-0217, RR-0218, RR-0219, RR-0221, RR-0222, RR-0224, RR-0226, RR-0227, RR-0229, RR-0232, RR-0233, RR-0235, RR-0237, RR-0238, RR-0239, RR-0240, RR-0241, RR-0242, RR-0243, RR-0245, RR-0246, RR-0249, RR-0251, RR-0254, RR-0255, RR-0256, RR-0258, RR-0259, RR-0260, RR-0262, RR-0263, RR-0264, RR-0265, RR-0267, RR-0268, RR-0269, RR-0271, RR-0272, RR-0273, RR-0274,			Draft NPS EN-3 provides clarification and guidance on how policies relating to BMVL should be interpreted for solar NSIP schemes. It clarifies at paragraph 2.48.15 that the development of solar arrays on BMVL is not prohibited and that given the scale of NSIP solar projects, the use of some agricultural land is likely. At paragraph 2.48.13 it also sets out that <i>"land type should not be a predominating factor in determining the suitability of the site location"</i>. Finally, it is noted that food security is not raised as a principal issue in the Longfield Solar Farm project (EN010118) that is currently in examination and does not appear to have been a matter which was considered during the examination of Little Crow (EN10101). The Applicant has reviewed the Examining Authority's report and the impact on agricultural land as a resource is considered, but the impact of the scheme on the ability for the UK to produce the food it requires to feed its population does not appear to be a factor considered. This is in the context of the Food Security Report published in December 2021, before the Examining Authority's report was published and the Secretary of State's decision. In terms of food security, temporary use of this land for renewable energy with livestock grazing would not have a significant impact on UK food security. The Defra 2021 food security report highlights soil degradation and climate change to be among the most significant threats to national food security. The introduction states - <i>"The biggest medium to long term risk to the UK's domestic production comes from climate change and other environmental pressures like soil degradation, water quality and biodiversity. Wheat yields dropped by 40% in 2020 due to heavy rainfall and droughts at bad times in the growing season. Although they have bounced back in 2021, this is an indicator of the effect that increasingly unreliable weather patterns may have on future production."</i> As well as addressing climate change, the reversion of arable land to grass for 40 years will allow soil health to recover.

Parties	Issue	Summary of issue raised	Applicant's response
RR-0278, RR-0279, RR-0280, RR-0281, RR-0284, RR-0285, RR-0288, RR-0289, RR-0290, RR-0292, RR-0296, RR-0297, RR-0298, RR-0299, RR-0301, RR-0303, RR-0305, RR-0306, RR-0307, RR-0308, RR-0309, RR-0311, RR-0313, RR-0314, RR-0315, RR-0327, RR-0329, RR-0331, RR-0336, RR-0337, RR-0339, RR-0340, RR-0341, RR-0343, RR-0344, RR-0345, RR-0346, RR-0347, RR-0348, RR-0349, RR-0350, RR-0351, RR-0354, RR-0355, RR-0357, RR-0359, RR-0360, RR-0363, RR-0365, RR-0366, RR-0368, RR-0369, RR-0371, RR-0372, RR-0374, RR-0375, RR-0376, RR-0377, RR-0379, RR-0380, RR-0382, RR-0386, RR-0387, RR-0389, RR-0390, RR-0395, RR-0396, RR-0398, RR-0399, RR-0400, RR-0404, RR-0405, RR-0437, RR-0406, RR-0407, RR-0408, RR-0410, RR-0415, RR-0416, RR-0419, RR-0420, RR-0421, RR-0422, RR-0424, RR-0425,			

Parties	Issue	Summary of issue raised	Applicant's response
RR-0426, RR-0427, RR-0428, RR-0429, RR-0430, RR-0432, RR-0433, RR-0434, RR-0436, RR-0438, RR-0439, RR-0440, RR-0442, RR-0443, RR-0444, RR-0445, RR-0446, RR-0447, RR-0448, RR-0450, RR-0451, RR-0452, RR-0453, RR-0454, RR-0455, RR-0456, RR-0457, RR-0458, RR-459, RR-0460, RR-0461, RR-0464, RR-0465, RR-0467, RR-0468, RR-0469, RR-0471, RR-0472, RR-0473, RR-0475, RR-0476, RR-0477, RR-0480, RR-0481, RR-0483, RR-0486, RR-0490, RR-0491, RR-0492, RR-0493, RR-0494, RR-0495, RR-0496, RR-0497, RR-0499, RR-0500, RR-0501, RR-0506, RR-0507, RR-0508, RR-0509, RR-0510, RR-0511, RR-0514, RR-0515, RR-0516, RR-0518, RR-0519, RR-0520, RR-0523, RR-0525, RR-0527, RR-0530, RR-0534, RR-0537, RR-0539, RR-0541, RR-0542, RR-0544, RR-0545, RR-0546, RR-0548, RR-0549, RR-0550, RR-0551,			

Parties	Issue	Summary of issue raised	Applicant's response
RR-0552, RR-0554, RR-0557, RR-0559, RR-0563, RR-0564, RR-0568, RR-0569, RR-0570, RR-0571, RR-0572, RR-0575, RR-0576, RR-0577, RR-0578, RR-0579, RR-0580, RR-0581, RR-0582, RR-0583, RR-0584, RR-0586, RR-0587, RR-0588, RR-0589, RR-0591, RR-0592, RR-0593, RR-0595, RR-0596, RR-0598, RR-0600, RR-0601, RR-0602, RR-0603, RR-0604, RR-0607, RR-0608, RR-0610, RR-0612, RR-0614, RR-0615, RR-0616, RR-0617, RR-0618, RR-0620, RR-0621, RR-0622, RR-0623, RR-0624, RR-0628, RR-0629, RR-0630, RR-0631, RR-0632, RR-0633, RR-0635, RR-0636, RR-0637, RR-0640, RR-0642, RR-0643, RR-0646, RR-0647, RR-0648, RR-0649, RR-0650, RR-0651, RR-0653, RR-0654, RR-0655, RR-0656, RR-0657, RR-0659, RR-0660, RR-0662, RR-0663, RR-0665, RR-0666, RR-0667, RR-0668, RR-0669, RR-0672, RR-0673, RR-0674,			

Parties	Issue	Summary of issue raised	Applicant's response
RR-0675, RR-0676, RR-0677, RR-0678, RR-0680, RR-0681, RR-0683, RR-0684, RR-0685, RR-0686, RR-0688, RR-0689, RR-0690, RR-0691, RR-0692, RR-0693, RR-0694, RR-0695, RR-0697, RR-0698, RR-0699, RR-0701, RR-0704, RR-0705, RR-0706, RR-0707, RR-0708, RR-0711, RR-0714, RR-0715, RR-0716, RR-0717, RR-0718, RR-0719, RR-0720, RR-0721, RR-0722, RR-0723, RR-0725, RR-0726, RR-0727, RR-0728, RR-0732, RR-0733, RR-0734, RR-0736, RR-0737, RR-0739, RR-0740, RR-0741, RR-0743, RR-0744, RR-0746, RR-0747, RR-0748, RR-0749, RR-0750, RR-0752, RR-0754, RR-0756, RR-0757, RR-0758, RR-0759, RR-0760, RR-0761, RR-0762, RR-0764, RR-0765, RR-0769, RR-0770, RR-0771, RR-0772, RR-0773, RR-0774, RR-0775, RR-0777, RR-0778, RR-0784, RR-0785, RR-0786, RR-0787, RR-0790, RR-0792, RR-0793, RR-0794,			

Parties	Issue	Summary of issue raised	Applicant's response
RR-0795, RR-0798, RR-0799, RR-0800, RR-0801, RR-0804, RR-0807, RR-0808, RR-0810, RR-0814, RR-0815, RR-0816, RR-0819, RR-0820, RR-0821, RR-0822, RR-0823, RR-0825, RR-0826, RR-0827, RR-0828, RR-0829, RR-0831, RR-0832, RR-0833, RR-0835, RR-0836, RR-0837, RR-0838, RR-0839, RR-0840, RR-0841, RR-0842, RR-0843, RR-0844, RR-0847, RR-0848, RR-0849, RR-0850, RR-0853, RR-0854, RR-0856, RR-0857, RR-0858, RR-0860, RR-0863, RR-0864, RR-0865, RR-0867, RR-0869, RR-0871, RR-0872, RR-0873, RR-0878, RR-0879, RR-0881, RR-0882, RR-0883, RR-0884, RR-0887, RR-0889, RR-0890, RR-0891, RR-0892, RR-0893, RR-0894, RR-0896, RR-0897, RR-0898, RR-0899, RR-0901, RR-0902, RR-0903, RR-0905, RR-0906, RR-0907, RR-0908, RR-0909, RR-0910, RR-0912, RR-0913, RR-0915, RR-0916, RR-0918, RR-0919,			

Parties	Issue	Summary of issue raised	Applicant's response
RR-0920, RR-0921, RR-0922, RR-0924, RR-0925, RR-0926, RR-0928, RR-0930, RR-0931, RR-0932, RR-0936, RR-0937, RR-0939, RR-0940, RR-0941, RR-0943, RR-0944, RR-0945, RR-0946, RR-0948, RR-0950, RR-0951, RR-0952, RR-0954, RR-0955, RR-0958, RR-0962, RR-0964, RR-0967, RR-0969, RR-0972, RR-0973, RR-0974, RR-0975, RR-0978, RR-0979, RR-0980, RR-0982, RR-0983, RR-0987, RR-0992, RR-0994, RR-0996, RR-0999, RR-1000, RR-1001, RR-1004, RR-1005, RR-1009, RR-1010, RR-1011, RR-1014, RR-1015, RR-1016, RR-1019, RR-1020, RR-1021, RR-1023, RR-1026, RR-1027, RR-1032, RR-1033, RR-1034, RR-1035, RR-1036, RR-1038, RR-1040, RR-1042, RR-1044, RR-1045, RR-1046, RR-1049, RR-1055, RR-1056, RR-1057, RR-1058, RR-1060, RR-1061, RR-1063, RR-1066, RR-1067, RR-1068, RR-1070, RR-1071, RR-1072,			

Parties	Issue	Summary of issue raised	Applicant's response
RR-1076, RR-1080, RR-1081, RR-1082, RR-1083, RR-1084, RR-1086, RR-1087, RR-1089, RR-1090, RR-1091, RR-1093, RR-1094, RR-1095, RR-1096, RR-1100, RR-1101, RR-1102, RR-1103, RR-1105, RR-1107, RR-1108, RR-1109, RR-1113, RR-1114, RR-1115, RR-1116, RR-1118, RR-1110, RR-1112, RR-1119, RR-1120, RR-1121, RR-1123, RR-1125, RR-1126, RR-1127, RR-1128, RR-1130, RR-1131, RR-1133, RR-1134, RR-1139, RR-1140, RR-1141, RR-1145, RR-1146, RR-1147, RR-1148, RR-1150, RR-1152, RR-1155, RR-1156, RR-1157, RR-1158, RR-1160, RR-1161, RR-1164, RR-1166, RR-1167, RR-1168, RR-1169, RR-1174, RR-1175, RR-1177, RR-1180, RR-1181, RR-1182, RR-1183, RR-1184, RR-1185, RR-1186, RR-1187, RR-1188, RR-1193, RR-1194, RR-1197, RR-1198, RR-1202, RR-1203, RR-1204, RR-1205, RR-1206, RR-1207, RR-1209,			

Parties	Issue	Summary of issue raised	Applicant's response
RR-1210, RR-1211, RR-1212, RR-1213, RR-1216, RR-1217, RR-1219, RR-1222, RR-1223, RR-1224, RR-1225, RR-1229, RR-1230, RR-1231, RR-1232, RR-1233, RR-1234, RR-1235, RR-1236, RR-1237, RR-1238, RR-1239, RR-1241, RR-1242, RR-1243, RR-1244, RR-1246, RR-1248, RR-1249, RR-1250, RR-1256, RR-1257, RR-1260, RR-1264, RR-1265, RR-1269, RR-1271, RR-1272, RR-1273, RR-1276, RR-1277, RR-1278, RR-1279, RR-1281, RR-1282, RR-1283, RR-1284, RR-1287, RR-1288, RR-1293, RR-1297, RR-1298, RR-1300, RR-1301, RR-1303, RR-1306, RR-1307, RR-1308, RR-1309, RR-1310, RR-1311, RR-1313, RR-1314, RR-1316, RR-1317, RR-1318, RR-1319, RR-1320, RR-1323, RR-1324, RR-1326, RR-1327, RR-1328, RR-1329, RR-1333, RR-1334, RR-1335, RR-1336, RR-1338, RR-1341, RR-1346, RR-1349, RR-1350, RR-1352, RR-1353,			

Parties	Issue	Summary of issue raised	Applicant's response
RR-1354, RR-1355, RR-1356, RR-1357, RR-1358, RR-1360			
RR-0024, RR-0059, RR-0160, RR-0161, RR-0165, RR-0207, RR-0239 RR-0534, RR-0544, RR-0572, RR-0582, RR-0593, RR-0595, RR-0597, RR-0606, RR-0726, RR-0774, RR-0775, RR-0797, RR-0819, RR-0824, RR-0825, RR-0827, RR-0829, RR-0835, RR-0841, RR-0860, RR-0868, RR-0873, RR-0875, RR-0878, RR-0880, RR-0881, RR-0884, RR-0887, RR-0889, RR-0890, RR-0892, RR-0899, RR-0907, RR-0912, RR-0963, RR-0972, RR-1035, RR-1040, RR-1102, RR-1112, RR-1128, RR-1136, RR-1141, RR-1143, RR-1167, RR-1177, RR-1206	Agricultural land	The Scheme's agricultural land classification surveys are not accurate and report that the quality of the land is poorer than it is in reality.	The ALC assessment presented for the Sunnica application is a combination of survey work by three organisations. In addition to the work commissioned for Sunnica, it includes the ALC survey of the consented minerals site and ALC survey work by MAFF. The results of the three separate surveying organisations are consistent. All three survey providers used the current ALC methodology (MAFF October 1988) and found predominantly light textured and shallow soils limited to grade by soil droughtiness. Daniel Baird, Sunnica's soil consultant, is an experienced soil surveyor whose professional experience in ALC survey dates back three decades to his time with the former MAFF ALC survey team. He is a Member of the British Society of Soil Science (BSSS) and abides by the professional conduct and practice of the BSSS. It is not appropriate for the interested parties to say that the surveys are inaccurate without going onto to say what those inaccuracies are. Sunnica considers its studies are accurate and robust.
RR-0332, RR-0783, RR-0866	Agricultural land	The Scheme constitutes a good use of poor quality farmland.	The Applicant agrees that it is a good and appropriate use of farmland.
RR-0009, RR-0021, RR-0024, RR-0207, RR-0239, RR-0539, RR-0590, RR-0607, RR-0774, RR-0824, RR-1040, RR-1102, RR-	Agricultural land	Independent assessment of the impact on agricultural land is required.	The ALC assessment presented for the Sunnica application is a combination of survey work by three organisations. In addition to the work commissioned for Sunnica, it includes the ALC survey of the consented minerals site and ALC survey work by MAFF. The results of the three separate surveying organisations, agree. All three survey providers used the current ALC

Parties	Issue	Summary of issue raised	Applicant's response
1112, RR-1128, RR-1167, RR-1182, RR-1206			methodology (MAFF October 1988) and found predominantly light textured and shallow soils limited to grade by soil droughtiness. The ALC assessment by Daniel Baird Soil Consultancy, Sunnica's soil consultants, is an objective assessment by an experienced soil scientist who is a member of the British Society of Soil Science (BSSS). BSSS Code of Conduct requires that all members discharge their professional responsibilities with integrity and due scientific and technical competence.
RR-0126, RR-0278, RR-0842	Agricultural land	There is already pressure on agricultural land due to the horseracing industry and new housing.	96% of the land within Sunnica East Sites A and B and Sunnica West Sites A and B is classified grades 3b and 4. This means that it is lower quality agricultural land, not classified as 'best and most versatile' (BMV). Paragraph 5.10.15 of NPS EN-1 and paragraph 5.11.14 of Draft NPS EN-1 set out that in deciding DCO applications, little weight should give to the loss of poorer quality agricultural land. Draft NPS EN-3 provides clarification and guidance on how policies relating to BMV agricultural land should be interpreted for solar NSIP schemes. It clarifies at paragraph 2.48.15 that the development of solar arrays on BMV agricultural land is not prohibited and that given the scale of NSIP solar projects, the use of some agricultural land is likely. The West Sussex Five Year Housing Land Supply report 2021 sets out that West Suffolk has a housing land supply of 5.6 years. The East Cambridgeshire Five Year Land Supply report 2021 sets out that East Cambridgeshire has a housing land supply of 7 years. Both of these demonstrate a five-year supply of housing land, in line with the requirements of the NPPF. There is therefore no reason to suppose that unallocated land would be needed for housing development. For housing or horserace training facilities, planning consent is permanent. For a solar renewable energy site, such as Sunnica Energy Farm, the consent is temporary, and the agricultural land resource is not lost. The land can also continue in agricultural use through the operation of the development, for grazing livestock.

Parties	Issue	Summary of issue raised	Applicant's response
RR-0982, RR-1128	Agricultural land	ALC Grade is not the only factor facilitating high quality and yield of crops.	The purpose of ALC assessment is to inform land use planning decisions in England and Wales, and thereby minimise any unnecessary loss of the best and most versatile agricultural land. ALC is the only agricultural land assessment methodology cited by English planning guidance (National Planning Policy Framework, July 2021, Para 174).
RR-1040, RR-1177	Agricultural land	The applicant's supporting evidence shows their ALC assessment has downgraded the land due to the need for irrigation. This downgrade relies on an email dated 2019 from Natural England that references the now superseded Planning Policy Guidance Note PPG7.	The application does not downgrade land surveyed by MAFF. It removes an upgrade MAFF applied, but which is no longer supported. The upgrade originally applied was for drought limited land with access to irrigation. Although PPG7 has been superseded, the option to upgrade drought limited land with irrigation infrastructure was not reinstated. The Natural England email dated June 2019 (Annex C of Appendix 12B of the Environmental Statement [APP-115]) was written long after PPG7 was superseded by PPS7 in 2004, and the NPPF in 2012. It concludes "<i>As a consequence the grading you referred to would need to be reviewed without irrigation. This would be an acceptable change in grading.</i>" When the ALC guidelines were published in 1988, concern over depletion of aquifers and surface waters was low, and farmers were less constrained on the volume of water they could abstract. Trickle irrigation systems had no limit on the volume of water that they could abstract. This has long since ceased to be the case. Clearly, land that has a significant drought limitation should not be upgraded to best and most versatile on the basis of irrigation infrastructure being available. The application of irrigation water is subject to abstraction licencing, and the volume of water available to a farm can be, and is, curtailed by the Environment Agency in response to drought conditions. Other demands on the same limited water resource, continue to rise.
RR-0158, RR-0162, RR-0871	Battery storage	A BESS fire could damage agricultural land and render land values as worthless.	The Applicant respectfully disagrees. It is unlikely that a BESS fire would occur in the first place. However if it did, mitigation is proposed so that damage to the agricultural land would not occur. The Outline Battery Fire Safety Management Plan [APP-267] includes a risk evaluation of the BESS during its life cycle and details the Applicant's proposed measures to reduce any risks. The BESS containers are located on hard standing as outlined within Chapter 3: Scheme Description of the Environmental Statement [APP-

Parties	Issue	Summary of issue raised	Applicant's response
			035] In addition, a localised water-based fire suppression system will be provided within each BESS container. Also, to reduce the potential for contamination in the unlikely event that a BESS fire occurs, impermeable surfacing and bunds have been included in the BESS design to hold fire water run-off and to prevent the water from leaching into the groundwater or migrating to surface water bodies nearby, as outlined in Chapter 9: Flood Risk, Drainage and Water Resources [APP-041] . Fire water within the lagoon will be held and tested to confirm the presence, or not, of contaminants. The water will either be discharged to the drainage swales if not contaminated or removed by tanker off site if contaminated.
RR-1017	LGC Campus	The Order limits include a substantial part of the LGC campus in Fordham which Sunnica is seeking wide-ranging powers over under the DCO.	The applicant is seeking only the powers necessary over land that forms part of the LGC campus for the laying and maintenance of the electrical cables between the solar PV site and Burwell substation. The applicant is in active discussion with the Landowner and Tenants in order to reach agreement.
RR-0189, RR-0809, RR-0873, RR-1128,	Soil	The Scheme will negatively impact on soil quality.	This statement is contrary to the experience of Sunnica's expert. Daniel Baird is an experienced soil surveyor and in addition, has worked for Defra managing its Soil Resources and Soil Protection research programmes. The Defra R&D project SP08016, Best Practice for Managing Soil Organic Matter in Agriculture (2009), shows that the reversion of arable land to grassland for an extended fallow period, will enable a recovery of soil health. Under a solar farm the soil health will benefit from 40 years of perennial plant cover and no ploughing. This will enable a recovery of soil organic matter depleted by cultivation. Benefits of this recovery include improving soil structural stability which enhances rainfall infiltration and reduces topsoil erosion by wind and rain.
RR-0593, RR-0603	Soil	The area of land in the UK growing many of these crops is limited by soil type so it will not be easy to simply grow the produce elsewhere.	Soils within the Site are light textured and free draining. Using the SoilsScapes service, the Site is shown as having soils in the basic categories of : - 1. 3. Shallow Lime Rich soils over chalk or limestone (7% coverage of the area of England)

Parties	Issue	Summary of issue raised	Applicant's response
			1. 7. Freely draining slightly acid but base rich soils (3% of England) 2. 10. Freely draining slightly acid sandy soils (2.8% of England) There are several other soil categories that are favoured for irrigation supported cropping covering additional area to the approximately 12.8% above. The proportion of this land that is irrigated is limited by the availability of water. Without irrigation on this drought prone land, crop yield and quality are limited. The light and droughty arable land at the site is in rotations of cereal crops interspaced with higher value crops such as potato, sugar beet and onion. Outdoor pigs are also included by some farms. On this very light and droughty soil the higher value crops require irrigation. Access to irrigation water is controlled by abstraction licences and the volume of water that can be abstracted can be curtailed by the Environment Agency, cutting the area of crop that can be supported that year. Farmers at the Site do not have sufficient volume of water to irrigate all their land, and so include rotations of unirrigated combinable crops which are low yielding on this droughty land, and are lower margin than the potato, carrot, onion and sugar beet irrigated crops. There is more light and droughty land in this area than there is water available to irrigate, and demand on the same limited water resource is growing from non-agricultural users.

3.4 Need

3.4.1 690 individual comments were received in relation to need for the Scheme.

Applicant's responses to RR's relating to need

Parties	Issue	Summary of issue raised	Applicant's response
RR-0012, RR-0108, RR-0314, RR-0391, RR-0827, RR-1077	Alternatives	Solar energy generation will become redundant as a technology, undermining the need for the Scheme.	The Statement of Need [APP-260] Chapter 3 highlights the very important contribution which has already been made by solar generation towards decarbonising the UK, and describes the challenges associated with bringing forward novel, large-scale infrastructure such as baseload low-carbon generation and carbon capture technologies. Solar on the other hand already has a proven track record of delivery and operation in the UK. Chapter 9 of the Statement of Need [APP-260] describes how solar is already the cheapest existing form of electricity generation in the UK and Chapter 7 shows how solar generation will operate alongside other low carbon generation (e.g. offshore wind) to provide a low-cost, high-reliability zero-carbon electricity system. Chapter 5 demonstrates that electricity demand will double in the 2050 timeframe because of the need to decarbonise energy use in other sectors. E.g. heat and transport, and Chapter 6 therefore concludes that significant additional generation capacity is therefore needed in the UK. Paragraph 1.3.7 of the Statement of Need [APP-260] draws on Government's view that " <i>a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar</i> ". The need for solar is urgent and enduring.
RR-0027, RR-0105, RR-0134, RR-0170, RR-0442, RR-0447, RR-0449, RR-0471, RR-0513, RR-0550, RR-0618, RR-0648, RR-0653, RR-	Alternatives	Solar energy generation is not efficient.	The Applicant accepts that on a gross energy-in-versus-energy-out basis, some other electricity generation technologies are more efficient than solar power. Figure 9-2 of the Statement of Need [APP-260] shows how solar cell efficiency has increased over the last 20 years up to an estimated solar PV cell efficiency of 26.8% for Crystalline Si cells. Solar panels are slightly less efficient than their constituent cell components, and according to The ECO Experts can be between 18% and 23% efficient. As a point of comparison, based on information made available by National Grid ESO (metered generation data by fuel type) and BEIS (through the 2021 Digest of UK Energy Statistics), coal generation in the UK was

Parties	Issue	Summary of issue raised	Applicant's response
0656, RR-0664, RR-0672, RR-0685, RR-0717, RR-0746, RR-0756, RR-0777, RR-0794, RR-0971, RR-1040, RR-1051, RR-1061, RR-1062, RR-1128			24% efficient in 2019-2020. While this information is not intended to be brought forward as a detailed like-for-like comparison, the Applicant believes that this information does enable the conclusion to be drawn, that solar PV is of a similar order of magnitude efficiency as other established generation technologies which are currently operating in the UK; and of course, without many of the environmental effects associated with some existing electricity generation technologies. Both wind power and nuclear power are judged to be c.35% efficient although the Applicant notes that wind power efficiency can increase to c.50% during peak wind times. Figure 9-2 and Chapter 9 of the Statement of Need [APP-260] also shows that, partly as a result of increasing cell efficiency, solar is already the cheapest existing form of electricity generation in the UK, and therefore as well as delivering decarbonisation benefits is also an efficient technology from a cost performance perspective. Figure 9-5 of the Statement of Need [APP-260] shows that solar is expected to become even cheaper on a lifetime unit cost of generation basis, and maintain its position as the cheapest form of electricity generation in the UK over the coming decades, again partly driven by greater efficiency over longer lifetimes, i.e. slower degradation. (Statement of Need Paragraph 9.2.9). Paragraph 6.4.6 of the Statement of Need [APP-260] demonstrates that the proposed location is a suitable site, and the efficient detailed design provides for an asset which is consistent with government's view of best practice ratios of land take and installed capacity.
RR-0014, RR-0077, RR-0088, RR-0104, RR-0105, RR-0178, RR-0180, RR-0181, RR-0294, RR-0494, RR-0527, RR-0581, RR-0618, RR-0624, RR-0634, RR-0640, RR-0664, RR-0724, RR-0755, RR-	Alternatives	There are other, more reliable and less disruptive ways of producing energy in the UK (hydro, wind, rooftop solar and nuclear).	The Statement of Need [APP-260] Chapter 3 highlights the very important contribution which has already been made by solar generation towards decarbonising the UK, and describes the challenges associated with bringing forward novel, large-scale infrastructure such as baseload low-carbon generation and carbon capture technologies, including hydro and nuclear. Government articulates the prudence of planning for infrastructure development on a conservative basis through the current draft version of the National Policy Statement EN-1. Conservative decision-making draws on recognising and utilising the benefits of bringing forwards proven and reliable forms of electricity generation to protect against possible delays in complex future projects. Section 7.8 of the Statement of Need [APP-260] describes how many different forms of low-carbon generation are needed to work towards a resilient, reliable and adequate electricity supply system. In particular, the relationship between solar and offshore wind is

Parties	Issue	Summary of issue raised	Applicant's response
0790, RR-0866, RR-0875, RR-0890, RR-0909, RR-0991, RR-0994, RR-1009, RR-1032, RR-1040, RR-1046, RR-1077, RR-1160, RR-1233, RR-1330, RR-1359			illustrated in Figures 7-2 and 7-3. The need for low carbon generation, as described in Chapter 6 of the Statement of Need [APP-260] , is of such an urgency and scale that all viable ways of economically producing low-carbon electricity should be explored and all schemes are additive to that need. Substitution of one scheme or technology over another is not an option if the Net Zero legal commitment is to be met. Paragraph 6.1.8 of the Statement of Need [APP-260] describes National Grid ESO's current forecast that between 305 and 357GW of generation capacity will be required to meet demand by 2050 (across a range of low-carbon technologies, including solar). Rooftop solar has a role to play in decarbonisation but the Statement of Need [APP-260] paragraph 1.3.11 explains that <i>"Government does not believe [decentralised and community energy systems] will replace the need for new large-scale electricity infrastructure to meet our energy objectives although it is recognised that they make an important contribution to meeting national targets on reducing carbon emissions and increasing energy security"</i> .
RR-1165, RR-1175	Alternatives	The Applicant should consider agrisolar for the Scheme.	Grassland below and between solar panels can be grazed by sheep or other small livestock as outlined and committed to in the Outline Landscape and Ecology Management Plan (OLEMP) [APP-108] . Agrisolar for arable or horticultural crops tends to be in tropical or sub-tropical climates where some crops benefit from shading. It is not considered appropriate in the UK as the UK has no need to provide crops with shade. As outlined in the Outline Landscape and Ecology Management Plan (OLEMP) [APP-108] the Scheme delivers a significant net gain for biodiversity. See ES paragraph 8.1.6. [APP-040] .
RR-0530	Alternatives	The technology must exist to allow roads and paths to generate electricity.	The Scheme is a new solar energy farm proposal that would deliver electricity to the National Electricity Transmission System. Section 7.6 of the Statement of Need [APP-260] expands on Government's view that large-scale, centralised electricity generating facilities which are connected to the high voltage transmission system are and will remain important in the UK because they enable the pooling of both generation and demand, which in turn offers a number of economic and other benefits, such as more efficient bulk transfer of power and enabling surplus generation capacity in one area to be used to cover shortfalls elsewhere. Section 6.4 of the Statement of Need [APP-260] covers site assessment and selection for

Parties	Issue	Summary of issue raised	Applicant's response
			large-scale solar in the UK. Given the overwhelming and urgent need for solar as set out in the Statement of Need, suitable locations must be found for solar development. In order to meet the significant capacity growth projections, it will be necessary to develop all sites which have been identified and assessed as suitable. Other forms of solar energy generation such as solar road panels have a role to play in decarbonisation but the Statement of Need [APP-260] Paragraph 1.3.11 explains that <i>"Government does not believe [decentralised and community energy systems] will replace the need for new large-scale electricity infrastructure to meet our energy objectives although it is recognised that they make an important contribution to meeting national targets on reducing carbon emissions and increasing energy security"</i>.
RR-0578	Alternatives	The government's proposals to expand offshore wind will make the Scheme redundant.	The Statement of Need [APP-260] Chapter 3 highlights the very important contribution which has already been made by solar generation towards decarbonising the UK, and describes the challenges associated with bringing forward novel, large-scale infrastructure such as baseload low-carbon generation and carbon capture technologies. Solar on the other hand already has a proven track record of delivery and operation in the UK. Chapter 9 of the Statement of Need [APP-260] describes how solar is already the cheapest existing form of electricity generation in the UK and Chapter 7 shows how solar generation will operate alongside other low carbon generation (e.g. offshore wind) to provide a low-cost, high-reliability zero-carbon electricity system. Chapter 7 also sets out that a variety of technologies will need to come forward in order for net zero commitments to be achieved. Chapter 5 demonstrates that electricity demand will double in the 2050 timeframe because of the need to decarbonise energy use in other sectors, e.g. heat and transport. Chapter 6 therefore concludes that significant additional generation capacity is needed in the UK. Paragraph 1.3.7 of the Statement of Need [APP-260] draws on Government's view that <i>"a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar"</i>. The need for solar is urgent and enduring.

Parties	Issue	Summary of issue raised	Applicant's response
RR-0009, RR-0216, RR-0218, RR-0825, RR-0827, RR-0828, RR-0835, RR-0912, RR-0951, RR-0967, RR-0969, RR-0972, RR-0983, RR-0988, RR-1015, RR-1034, RR-1128, RR-1131, RR-1206	BESS	The BESS is more important to the needs case for the Scheme than the solar generation element.	The Statement of Need [APP-260] clearly articulates the fundamental need for large-scale solar generation in the UK in order for the UK to meet its legally binding climate change targets. The UK has a legal commitment to achieve Net Zero by 2050 and the decarbonisation of UK electricity generation is an essential step to make this achievement. The evidence for this statement is included in the Statement of Need [APP-260] Chapter 2. Chapters 5, 6, 7 and 9 of the Statement of Need [APP-260] describe how significant capacities of low-carbon generation are required to meet future demand and Net Zero commitments; and that large-scale solar generation, including Sunnica Energy Farm and other projects like it, are needed as part of the transition to net zero. The UK currently has c.14.5GW of operational solar capacity, and Statement of Need Figure 6-1 [APP-260] demonstrates that UK solar capacity must grow to 70GW by 2050 in order to meet net zero. However, whether the sun shines or not cannot be controlled, and nor can solar power stations control when the energy they generate will be needed. A measure, such as Battery Energy Storage Systems (BESS), must therefore be introduced to ensure that if energy is generated when it is not needed that it can be stored for later use. Such a measure will accelerate the UK's decarbonisation progress, ultimately optimising the capacity and reliability of renewable generation to meet demand, and so keep costs for consumers as low as possible.. The BESS supports the operation of the principal solar development by providing the ability to store Sunnica's solar generation when it is not needed, and releasing it when it is needed. BESS are therefore not generators of renewable energy, but it is the generation of renewable energy which is fundamental to achieving net zero, and Sunnica aims to meet that need for generation by developing the principal, solar generation, component of the scheme. A standalone BESS development would not on its own meet the project's aims, therefore the BESS development is not more important to the needs case for the Scheme than the solar generation element. The associated BESS supports the Scheme and UK decarbonisation by preventing wastage of electricity that has been

Parties	Issue	Summary of issue raised	Applicant's response
			generated by the scheme and by making available as much energy as possible for those times of higher demand, i.e. when it is needed.
RR-0144	Comment	The Scheme will support the delivery of new homes by diversifying and strengthening the grid.	The Applicant notes within the Statement of Need [APP-260] that the Scheme provides a near-term opportunity to diversify the supply of energy and provide much-needed low carbon energy generation to the national electricity grid. In helping to ensure that the national energy supply is secure, low-carbon and low-cost the Scheme will contribute towards other national policy goals such as sustainable economic growth and the delivery of new homes.
RR-0670, RR-0825, RR-0834, RR-1128, RR-1332,	Energy security	The Scheme is needed to reduce reliance on energy imports from Russia.	This comment is noted.
RR-0021, RR-0333, RR-0520, RR-0703, RR-0814, RR-0836	Generating capacity	The generating capacity of the Scheme is overstated.	The Applicant disagrees with this assessment. The Applicant has not stated a generating capacity within the Application as it is not applying for development consent for a given generating capacity. This approach allows the Scheme, to take advantage of improvements in technology between now and the point of commencement of development when more efficient PV Panels are likely to be available. An assumption has been made as to the annual production from the site in terms of kWh in order to calculate the potential impact on the climate. Details of this calculation can be found within Chapter 6: Climate Change of the Environmental Statement [APP-038] .
RR-0427, RR-0429, RR-0539, RR-0564, RR-0602, RR-0610, RR-0635, RR-1206, RR-1312	Need	There is already enough solar energy generation in the local area.	The Scheme is a new solar energy farm proposal that would deliver electricity to the National Electricity Transmission System. Section 7.6 of the Statement of Need [APP-260] expands on the Government's view that large-scale, centralised electricity generating facilities which are connected to the high voltage transmission system are and will remain important in the UK, because they enable the pooling of both generation and demand, which in turn offers a number of economic and other benefits, such as more efficient bulk transfer of power and enabling surplus generation capacity in one area to be used to cover shortfalls elsewhere. Section 6.4 of the Statement of Need [APP-260] covers site assessment and selection for large-scale solar in the UK. Given the overwhelming and urgent need for solar as

Parties	Issue	Summary of issue raised	Applicant's response
			set out in the Statement of Need, suitable locations must be found for solar development. In order to meet the significant capacity growth projections, it will be necessary to develop all sites which have been identified and assessed as suitable. The cumulative impacts from the Scheme in combination with other schemes, including solar farms, in the area have been considered for all environmental disciplines. These assessments are presented within each of the technical chapters in the Environmental Statement (Chapters 6 to 16, [APP-038 to APP-048]). No significant cumulative effects with other developments (including the nearby solar developments) have been identified during the Scheme's operation.
RR-0001, RR-0005, RR-0006, RR-0009, RR-0014, RR-0026, RR-0041, RR-0043, RR-0049, RR-0050, RR-0059, RR-0060, RR-0061, RR-0064, RR-0075, RR-0078, RR-0088, RR-0092, RR-0109, RR-0110, RR-0111, RR-0121, RR-0164, RR-0170, RR-0185, RR-0186, RR-0189, RR-0199, RR-0240, RR-0248, RR-0280, RR-0281, RR-0305, RR-0322, RR-0334, RR-0336,	Need	The Scheme is motivated by the Applicant's desire for profit rather than need.	The Statement of Need [APP-260] clearly articulates the fundamental need for large-scale solar generation in the UK in order for the UK to meet its legally binding climate change targets. The need case is built upon the contribution of the Scheme to the three important national policy aims of net zero and the importance of deploying zero-carbon generation assets at scale; security of supply (geographically and technologically diverse supplies); and affordability of electricity supplies. Chapter 9 of the Statement of Need [APP-260] provides an analysis of the economic viability of large-scale solar generation as a future contributor to a low-carbon GB electricity supply system in comparison to alternate technologies; and an analysis of why the Scheme will be most beneficial to the achievement of government's net zero aims if it is consented to the scale proposed.

Parties	Issue	Summary of issue raised	Applicant's response
RR-0340, RR-0346, RR-0347, RR-0365, RR-0369, RR-0390, RR-0396, RR-0424, RR-0433, RR-0446, RR-0478, RR-0495, RR-0503, RR-0528, RR-0560, RR-0565, RR-0580, RR-0583, RR-0619, RR-0636, RR-0650, RR-0657, RR-0659, RR-0665, RR-0673, RR-0675, RR-0678, RR-0708, RR-0726, RR-0743, RR-0761, RR-0786, RR-0793, RR-0829, RR-0839, RR-0877, RR-0879, RR-0901, RR-0976, RR-0980, RR-0987, RR-1015, RR-1031, RR-1061, RR-1062, RR-1067, RR-1075, RR-1110, RR-1168, RR-1188, RR-1206,			

Parties	Issue	Summary of issue raised	Applicant's response
RR-1207, RR-1212, RR-1238, RR-1245, RR-1272, RR-1331, RR-1341, RR-1354			
RR-1109	Need	The PV panels will not generate at night, reducing their contribution to energy needs.	The Applicant agrees that PV panels will not generate at night but the Statement of Need [APP-260] , and the benefits accorded to the Scheme in relation to its significant contribution to decarbonisation in Great Britain, have been based on the assumption that the Scheme will only generate during daylight hours. Moreover, the Statement of Need [APP-260] describes in Chapter 9 how solar is already the cheapest existing form of electricity generation in the UK even though it generates only in daylight hours, and Figure 9-2 of the Statement of Need [APP-260] shows how solar efficiency has increased over the last 20 years of its development. Figure 9-5 of the Statement of Need [APP-260] shows that solar is expected to become even cheaper on a lifetime unit cost of generation basis and maintain its position as the cheapest form of electricity generation in the UK over the coming decades. Paragraph 6.4.6 of the Statement of Need [APP-260] demonstrates that the proposed location is a suitable site including in terms of expected irradiation levels.
RR-0023, RR-0125, RR-0179, RR-0253, RR-0282, RR-0332, RR-0609, RR-0670, RR-0679, RR-0696, RR-0796, RR-0834, RR-0866	Need	Energy sources are needed and the Scheme should be brought forward.	This comment is noted.
RR-0027, RR-0111, RR-0161, RR-0260, RR-0286, RR-0288, RR-0297, RR-	Need	Query if the Scheme is for selling energy at times of higher demand at inflated costs rather than meeting a true need for energy.	The UK has a legal commitment to achieve net zero by 2050 and the decarbonisation of UK electricity generation is an essential step to make this achievement. The evidence for this statement is included in the Statement of Need [APP-260] Chapter 2. Chapters 5, 6, 7 and 9 of the Statement of Need [APP-260] describe how significant capacities of low-carbon generation are required to meet

Parties	Issue	Summary of issue raised	Applicant's response
0303, RR-0307, RR-0446, RR-0524, RR-0525, RR-0539, RR-0570, RR-0636, RR-0639, RR-0646, RR-0659, RR-0703, RR-0704, RR-0721, RR-0743, RR-0744, RR-0761, RR-0764, RR-0816, RR-0819, RR-0844, RR-0972, RR-1001, RR-1054, RR-1061, RR-1101, RR-1112, RR-1125, RR-1132, RR-1150, RR-1158, RR-1188			future demand and net zero commitments; and that large-scale solar generation, including Sunnica Energy Farm and other projects like it, are needed as part of the transition to net zero. The UK currently has c.14.5GW of operational solar capacity, and Statement of Need Figure 6-1 [APP-260] demonstrates that UK solar capacity must grow to 70GW by 2050 in order to meet Net Zero. However, whether the sun shines or not cannot be controlled, and nor can solar power stations control when the energy they generate will be needed. A measure, such as Battery Energy Storage Systems (BESS), must therefore be introduced to ensure that if energy is generated when it is not needed that it can be stored for later use. Such a measure will accelerate the UK's decarbonisation progress, ultimately optimising the capacity of renewable generation required reliably to meet demand, and so keep costs for consumers as low as possible. The BESS supports the operation of the principal solar development by providing the ability to store Sunnica's solar generation when it is not needed, and releasing it when it is needed. BESS are therefore not generators of renewable energy, but it is the generation of renewable energy which is fundamental to achieving net zero, and Sunnica aims to meet that need for generation by developing the principal, solar generation, component of the Scheme. A standalone BESS development would not on its own meet the project's aims, therefore the BESS development is not more important to the needs case for the Scheme than the solar generation element. The associated BESS supports the scheme and UK decarbonisation by preventing wastage of electricity that has been generated by the scheme and by making available as much energy as possible for those times of higher demand, i.e. when it is needed.
RR-0080, RR-0272, RR-0585	Need	There is no need for this Scheme.	The Statement of Need [APP-260] clearly articulates the fundamental need for large-scale solar generation in the UK in order for the UK to meet its legally binding climate change targets. The need case is built upon the contribution of the Scheme to the three important national policy aims of net zero and the importance of deploying zero-carbon generation assets at scale; security of supply (geographically and technologically diverse supplies); and affordability of electricity supplies. Chapter 2 of the Statement of Need [APP-260] sets out the legal

Parties	Issue	Summary of issue raised	Applicant's response
			requirement for decarbonisation in the UK and explains how that requirement has developed based on an increased need and urgency for decarbonisation in order to meet the UK's obligations under the Paris Agreement (2015). Chapter 3 of the Statement of Need [APP-260] provides an up-to-date view of how decarbonisation in the UK has been achieved to date, including through the deployment of significant numbers of solar schemes. Chapter 5 of the Statement of Need [APP-260] confirms that future electricity demand will grow significantly through the decarbonisation-through-electrification of other industry sectors and therefore that significant new low-carbon electricity schemes, and particularly Sunnica, as discussed in Chapter 6 of the Statement of Need, are required to meet that demand and deliver decarbonisation. Section 7.8 of the Statement of Need [APP-260] describes how a diverse renewable generation portfolio which includes solar generation is better placed to meet UK demand than a renewable generation portfolio which does not include solar generation.
RR-1017	Planning balance	The Scheme's certainty of storage and generation of energy to meet national need in practice would need to be weighed against its interference with the LGC Campus's pharmaceutical development activities and delay in bringing forward or extinguishing the estimated £53 million annual contribution to the economy that development under the Campus Expansion Permission will bring (including 918 full time equivalent jobs).	Section 2.6 and Table 2-1 of Planning Statement Part 1 [APP-261] identify the interaction between the Scheme and the Hybrid planning application made by Hermes Property Unit Trust (HPUT) for demolition, alteration and extension of a business park to provide a range of business floorspace including Use Classes B1/B2/B8, A1/A3 and/or D2 associated with the bioanalytical centre operated by LGC Limited, which was granted in 2019 (ECDC ref: 17/01838/ESF). The Applicant understands that this permission has expired but acknowledges the aspirations of the Interested Party. Nevertheless, it is the case that the cable route would not have impacted on the development that was subject to the planning permission. The planning statement sets out that land within the 17/01838/ESF Planning Permission boundary that also forms part of the Order Limits comprises proposed car parking (for Planning Permission 17/01838/ESF). The land within Order Limits that is inside the boundary Planning Permission 17/01838/ESF would form part of Grid Connection Route B and access to Grid Connection Route B during the construction period (for the Scheme). There would be no interaction of the Scheme with proposed or existing buildings that form part of Planning Permission 17/01838/ESF or the existing LGC Campus.

Parties	Issue	Summary of issue raised	Applicant's response
			Section 6.13 of the Planning Statement Part 1 [APP-261] considers the impact of the Scheme on Planning Permission 17/01838/ESF. It explains that the Scheme is not expected to have any land use conflict with the planning permission because the cable route corridor for Grid Connection Route B will avoid the built development proposals and pass under the car park only. It is anticipated that the construction of Grid Connection Route B within the boundary of the existing LGC Campus facility and Planning Permission 17/01838/ESF would be for up to 45 days; however, this is dependent on the final phasing and construction programme which will be developed by the Principal Contractor prior to construction. Given the very minor nature of the interaction of the Scheme with LGC Campus, the Scheme would not result in the extinguishment of development aspirations. Due to the short duration of Scheme construction activity in that location, it would also not result in any substantial delay in bringing forward development of the Campus. Regarding existing pharmaceutical development activities undertaken at the Campus, the Applicant notes that the Scheme would also not have any direct land use conflict with the existing LGC Campus because the cable route corridor for Grid Connection Route B will avoid buildings, roadways and car parks that form the facility. It would pass through land at the north of the site, which is not used as part of the LGC Campus activities. It also notes that construction activity at the campus would also take place for a maximum of 45 days. The Applicant is working with the Interested Party to provide additional information that the Interested Party has requested in order to inform detailed consideration of the impact of the Scheme on its activities and to hopefully conclude that the Scheme will not have an unacceptable impact on the LGC campus.
RR-0043, RR-0166, RR-0857, RR-0892, RR-0903	Planning balance	Food production should be prioritised over energy generation.	The Applicant is not aware of any policy which sets out that food production should be prioritised over renewable energy generation infrastructure.

Parties	Issue	Summary of issue raised	Applicant's response
			The Applicant's Response to Procedural Decision Dated 28 July 2022 was issued to the ExA on 5 August 2022. At paragraphs 4 to 11 it sets out the Applicant's position on food security. The Energy NPSs, draft Energy NPSs and the NPPF do not make reference to food security in relation to the determination of applications for energy generation schemes. This is a conscious decision by Government. Further, NPS EN-1 and draft NPS EN-1 set out that energy is essential to our ability to produce and transport food, stating at paragraphs 3.2.1 and 2.3.1, respectively, that: <i>"Energy underpins almost every aspect of our way of life. It enables us to heat and light our homes; to produce and transport food..."</i>. As is reported in the Application (see Table 12.20 of Chapter 12: Socio-Economics and Land Use of the Environmental Statement [APP-044]), over 96% of the land within Sunnica East Sites A and B and Sunnica West Sites A and B is classified as grades 3b, 4 or not in agricultural use. This means that it is lower quality land, not classified as BMVL. Lower quality agricultural land (in ALC grades 3b, 4 and 5) does not benefit from the same protection as BMVL, with paragraph 5.10.15 of NPS EN1 and paragraph 5.11.14 of Draft NPS EN-1 setting out that in deciding DCO applications, little weight should be given to the loss of poorer quality agricultural land. The use of the remaining 4% which comprises BMVL is justified by other sustainability considerations. These include the fact that much of that land represents small pockets of BMVL surrounded by lower grade land, and it would not be practicable to exclude it from the Scheme without also excluding larger areas of lower grade land. In addition, the Grade 3a land in the eastern parcel of Sunnica West is highly suitable and productive for solar generation given its south facing orientation. Draft NPS EN-3 provides clarification and guidance on how policies relating to BMVL should be interpreted for solar NSIP schemes. It clarifies at paragraph 2.48.15 that the development of solar arrays on BMVL is not prohibited and that

Parties	Issue	Summary of issue raised	Applicant's response
			given the scale of NSIP solar projects, the use of some agricultural land is likely. At paragraph 2.48.13 it also sets out that <i>"land type should not be a predominating factor in determining the suitability of the site location"</i>. Finally, it is noted that food security is not raised as a principal issue in the Longfield Solar Farm project (EN010118) that is currently in examination and does not appear to have been a matter which was considered during the examination of Little Crow (EN10101). The Applicant has reviewed the Examining Authority's report and the impact on agricultural land as a resource is considered, but the impact of the scheme on the ability for the UK to produce the food it requires to feed its population does not appear to be a factor considered. This is in the context of the Food Security Report being published in December 2021, before the Examining Authority's report was published and the Secretary of State's decision.
RR-0006, RR-0007, RR-0017 RR-0028, RR-0040, RR-0046, RR-0047, RR-0050, RR-0077, RR-0081, RR-0092, RR-0113, RR-0118, RR-0124, RR-0134, RR-0138, RR-0140, RR-0141, RR-0142, RR-0143, RR-0148, RR-0152, RR-0155, RR-0157, RR-0161, RR-0167, RR-0168, RR-0170, RR-0176, RR-0177, RR-0180, RR-	Sentiment	I oppose the Scheme.	The Applicant notes this comment and acknowledges that not everyone is supportive of the Scheme. The Applicant has prepared its proposals having had regard to feedback received across both statutory and non-statutory consultations. This has meant that the Applicant's proposals have been shaped by feedback that it has received. Further information on the consultation undertaken and how feedback has been taken into account can be found in the Consultation Report [APP-026] and Consultation Report Appendices J-1 to J-5 [APP-030]. The Applicant is bringing forward the Application to answer a need for new sources of energy generation and has provided further details for this in the Statement of Need [APP-260].

Parties	Issue	Summary of issue raised	Applicant's response
0190, RR-0196, RR-0197, RR-0200, RR-0201, RR-0202, RR-0204, RR-0205, RR-0210, RR-0211, RR-0216, RR-0219, RR-0224, RR-0226, RR-0230, RR-0236, RR-0237, RR-0241, RR-0242, RR-0243, RR-0249, RR-0250, RR-0251, RR-0252, RR-0258, RR-0259, RR-0260, RR-0262, RR-0265, RR-0275, RR-0279, RR-0285, RR-0288, RR-0292, RR-0295, RR-0299, RR-0304, RR-0305, RR-0315, RR-0316, RR-0323, RR-0330, RR-0334, RR-0335, RR-0336, RR-0337, RR-0338, RR-0339, RR-0340, RR-0341, RR-0347, RR-			

Parties	Issue	Summary of issue raised	Applicant's response
0348, RR-0350, RR-0351, RR-0355, RR-0357, RR-0358, RR-0365, RR-0369, RR-0370, RR-0372, RR-0376, RR-0378, RR-0380, RR-0385, RR-0386, RR-0387, RR-0397, RR-0408, RR-0410, RR-0412, RR-0414, RR-0416, RR-0417, RR-0420, RR-0425, RR-0427, RR-0428, RR-0430, RR-0436, RR-0438, RR-0444, RR-0450, RR-0457, RR-0459, RR-0461, RR-0468, RR-0471, RR-0472, RR-0480, RR-0482, RR-0483, RR-0486, RR-0488, RR-0491, RR-0493, RR-0497, RR-0498, RR-0502, RR-0516, RR-0519, RR-0520, RR-			

Parties	Issue	Summary of issue raised	Applicant's response
0529, RR-0533, RR-0536, RR-0538, RR-0539, RR-0548, RR-0550, RR-0551, RR-0552, RR-0554, RR-0564, RR-0568, RR-0572, RR-0573, RR-0586, RR-0587, RR-0588, RR-0589, RR-0596, RR-0597, RR-0600, RR-0601, RR-0602, RR-0606, RR-0607, RR-0611, RR-0614, RR-0620, RR-0621, RR-0622, RR-0624, RR-0626, RR-0628, RR-0636, RR-0640, RR-0643, RR-0648, RR-0649, RR-0651, RR-0652, RR-0664, RR-0675, RR-0677, RR-0681, RR-0685, RR-0686, RR-0690, RR-0692, RR-0702, RR-0709, RR-0710, RR-			

Parties	Issue	Summary of issue raised	Applicant's response
0712, RR-0715, RR-0716, RR-0717, RR-0721, RR-0722, RR-0724, RR-0728, RR-0732, RR-0738, RR-0741, RR-0742, RR-0745, RR-0748, RR-0754, RR-0759, RR-0760, RR-0762, RR-0764, RR-0769, RR-0772, RR-0776, RR-0781, RR-0782, RR-0784, RR-0786, RR-0787, RR-0788, RR-0792, RR-0795, RR-0803, RR-0804, RR-0808, RR-0809, RR-0810, RR-0814, RR-0819, RR-0823, RR-0827, RR-0829, RR-0832, RR-0833, RR-0835, RR-0837, RR-0843, RR-0846, RR-0848, RR-0849, RR-0853, RR-0855, RR-0856, RR-			

Parties	Issue	Summary of issue raised	Applicant's response
0857, RR-0858, RR-0862, RR-0863, RR-0865, RR-0868, RR-0869, RR-0870, RR-0871, RR-0873, RR-0875, RR-0876, RR-0877, RR-0878, RR-0881, RR-0882, RR-0883, RR-0884, RR-0885, RR-0887, RR-0891, RR-0893, RR-0895, RR-0898, RR-0901, RR-0903, RR-0905, RR-0907, RR-0908, RR-0914, RR-0920, RR-0921, RR-0922, RR-0924, RR-0926, RR-0932, RR-0938, RR-0940, RR-0943, RR-0951, RR-0954, RR-0955, RR-0956, RR-0961, RR-0968, RR-0970, RR-0972, RR-0974, RR-0976, RR-0977, RR-0978, RR-			

Parties	Issue	Summary of issue raised	Applicant's response
0985, RR-0991, RR-0996, RR-0999, RR-1000, RR-1001, RR-1005, RR-1012, RR-1016, RR-1017, RR-1018, RR-1019, RR-1023, RR-1024, RR-1026, RR-1027, RR-1028, RR-1029, RR-1031, RR-1033, RR-1037, RR-1038, RR-1045, RR-1048, RR-1051, RR-1053, RR-1057, RR-1059, RR-1060, RR-1061, RR-1063, RR-1066, RR-1069, RR-1081, RR-1084, RR-1085, RR-1089, RR-1091, RR-1093, RR-1096, RR-1097, RR-1101, RR-1103, RR-1104, RR-1115, RR-1116, RR-1117, RR-1119, RR-1121, RR-1123, RR-1125, RR-			

Parties	Issue	Summary of issue raised	Applicant's response
1126, RR-1127, RR-1130, RR-1131, RR-1132, RR-1134, RR-1135, RR-1137, RR-1139, RR-1140, RR-1141, RR-1144, RR-1145, RR-1147, RR-1148, RR-1150, RR-1152, RR-1154, RR-1164, RR-1174, RR-1179, RR-1183, RR-1184, RR-1186, RR-1188, RR-1191, RR-1196, RR-1198, RR-1202, RR-1206, RR-1209, RR-1211, RR-1213, RR-1215, RR-1217, RR-1218, RR-1221, RR-1224, RR-1228, RR-1232, RR-1234, RR-1235, RR-1238, RR-1239, RR-1243, RR-1246, RR-1251, RR-1256, RR-1257, RR-1260, RR-1264, RR-			

Parties	Issue	Summary of issue raised	Applicant's response
1265, RR-1266, RR-1270, RR-1273, RR-1279, RR-1281, RR-1282, RR-1286, RR-1288, RR-1293, RR-1297, RR-1300, RR-1301, RR-1303, RR-1307, RR-1310, RR-1314, RR-1319, RR-1320, RR-1324, RR-1325, RR-1333, RR-1334, RR-1339, RR-1341, RR-1342, RR-1343, RR-1347, RR-1353			
RR-0696, RR-0783	Viability	Large-scale solar is an economically viable part of domestic renewable energy generation.	This comment is noted.

3.5 Design

3.5.1 862 individual comments were received in relation to the Scheme design.

Applicant's responses to RRs relating to Scheme design

Parties	Issue	Summary of issue raised	Applicant's response
RR-0004, RR-0009, RR-0016, RR-0018, RR-0019, RR-0020, RR-0025, RR-0027, RR-0031, RR-0032, RR-0033, RR-0042, RR-0056, RR-0057, RR-0062, RR-0064, RR-0065, RR-0089, RR-0100, RR-0103, RR-0111, RR-0130, RR-0138, RR-0139, RR-0164, RR-0167, RR-0142, RR-0162, RR-0170, RR-0171, RR-0184, RR-0187, RR-0189, RR-0202, RR-0210, RR-0215, RR-0219, RR-0222, RR-0233, RR-0234, RR-	BESS	The BESS is too close to residential areas and schools. This is a particular concern because of a fear the batteries will catch fire.	The Applicant has prepared the following documents: - Chapter 14: Air Quality of the Environmental Statement [APP-046]; - Appendix 16D: Unplanned Atmospheric Emissions from Battery Energy Storage Systems (BESS) of the Environmental Statement [APP-124]; - Outline Battery Fire Safety Management Plan [APP-267]; and - Major Accidents and Disasters section of Chapter 16 – Other Environmental Topics [APP-048]. The Outline Battery Fire Safety Management Plan [APP-267] provides a comprehensive review of the life safety and property protection fire safety requirements of the BESS at Sunnica East Site A, Sunnica East Site B and Sunnica West Site A. With the measures outlined in the Outline Battery Fire Safety Management Plan [APP-267], the Scheme does not give rise to a significant fire risk and any remaining low risk that does exist can be addressed by ensuring that the Scheme is constructed, operated and decommissioned in accordance those measures. Since submission of the original Outline Battery Fire Safety Management Plan [APP-267], the document has been peer reviewed and updated accordingly. The Applicant intends to submit the revised draft of the Outline Battery Fire Safety Management Plan at Deadline 2. These documents have considered the nearest receptors in all directions (250m away). These are considered to represent a worse case in comparison to other receptors located further away. Two locations that have been considered are the Pines Primary School in Red Lodge, and Brookside Stud. Both locations can be

Parties	Issue	Summary of issue raised	Applicant's response
0278, RR-0295, RR-0301, RR-0405, RR-0429, RR-0438, RR-0442, RR-0444, RR-0446, RR-0449, RR-0451, RR-0452, RR-0456, RR-0457, RR-0459, RR-0460, RR-0472, RR-0475, RR-0479, RR-0481, RR-0485, RR-0489, RR-0492, RR-0498, RR-0509, RR-0510, RR-0529, RR-0539, RR-0546, RR-0550, RR-0552, RR-0553, RR-0555, RR-0563, RR-0564, RR-0568, RR-0581, RR-0584, RR-0598, RR-0608, RR-0610, RR-0613, RR-0615, RR-0622, RR-0623, RR-0624, RR-0628, RR-0639, RR-0640, RR-0642, RR-0651, RR-			seen in Figure A2 of Appendix 16D: Unplanned Atmospheric Emissions from Battery Energy Storage Systems (BESS) of the Environmental Statement [APP-124]. All off-site receptors are located far enough from the BESS site that a measurable change of pollutants would not be able to occur with the level of dilution demonstrated to occur over this distance, for the scale of BESS proposed. Source concentrations would be diluted to 1/1000th of the source concentration (a dilution factor of 0.001) under 90% of the meteorological conditions likely to occur at the site, within 50m or less for all wind directions. Assuming a BESS facility that takes the form of a 5-rack fire before fire control measures bring the fire under control, emissions of Hydrogen Fluoride (HF) could cause concentrations over time periods of 10 minutes, 1 hour or up to 6 hours that are below the Acute Exposure Guideline Level (AEGL-1) value at locations within 100 m of the fire (and by definition at lower concentrations further afield due to dispersion of pollutants). In most instances the AEGL-1 value would be achieved within the application site boundary and in all cases in a shorter distance than that to the nearest sensitive receptors.

Parties	Issue	Summary of issue raised	Applicant's response
0654, RR-0657, RR-0662, RR-0663, RR-0671, RR-0676, RR-0680, RR-0681, RR-0685, RR-0686, RR-0689, RR-0692, RR-0697, RR-0699, RR-0701, RR-0704, RR-0705, RR-0709, RR-0716, RR-0717, RR-0722, RR-0723, RR-0726, RR-0727, RR-0733, RR-0735, RR-0741, RR-0747, RR-0753, RR-0759, RR-0766, RR-0773, RR-0775, RR-0777, RR-0784, RR-0787, RR-0793, RR-0797, RR-0800, RR-0827, RR-0835, RR-0836, RR-0843, RR-0847, RR-0854, RR-0855, RR-0858, RR-0860, RR-0871, RR-0881, RR-0885, RR-			

Parties	Issue	Summary of issue raised	Applicant's response
0887, RR-0889, RR-0890, RR- 0891, RR-0894, RR-0897, RR- 0899, RR-0907, RR-0914, RR- 0915, RR-0945, RR-0953, RR- 0956, RR-0971, RR-0972, RR- 0983, RR-0987, RR-1001, RR- 1010, RR-1015, RR-1022, RR- 1029, RR-1033, RR-1034, RR- 1035, RR-1039, RR-1040, RR- 1042, RR-1057, RR-1060, RR- 1066, RR-1070, RR-1076, RR- 1077, RR-1078, RR-1085, RR- 1086, RR-1095, RR-1099, RR- 1101, RR-1102, RR-1104, RR- 1105, RR-1107, RR-1110, RR- 1112, RR-1114, RR-1116, RR- 1118, RR-1120, RR-1126, RR-			

Parties	Issue	Summary of issue raised	Applicant's response
1127, RR-1130, RR-1131, RR-1141, RR-1143, RR-1148, RR-1150, RR-1154, RR-1158, RR-1164, RR-1168, RR-1180, RR-1185, RR-1203, RR-1204, RR-1205, RR-1206, RR-1209, RR-1210, RR-1211, RR-1242, RR-1250, RR-1281, RR-1307, RR-1317, RR-1323, RR-1337, RR-1347			
RR-0043, RR-0134, RR-0252, RR-0564, RR-0584, RR-0746, RR-0775, RR-0819, RR-0889, RR-0907, RR-0976, RR-1136, RR-1239, RR-1287	BESS	More detail is required regarding the design of the BESS.	As is established practice, the Applicant assessed the Scheme's impact according to the 'Rochdale Envelope' method of the maximum parameters or impact, meaning that a worst-case scenario for the impacts of the Scheme has been assessed in the Environmental Statement [APP-032 to APP-259] . It is established practice that detailed design only be finalised prior to commencement of construction and further information about the 'Rochdale Envelope' method is given in the Planning Inspectorate's Advice Note Nine: Rochdale Envelope. Finalisation of the detailed design is secured by a requirement in the DCO, which requires approval by the relevant planning authority of the detailed design in accordance with documents submitted as part of the DCO Application. This includes the Outline Battery Fire Safety Management Plan [APP-267] , and the Design Principles (Appendix B to the Design and Access Statement [APP-264] . Since submission of the original Outline Battery Fire Safety Management Plan [APP-267] , the document has been peer reviewed and updated accordingly. The

Parties	Issue	Summary of issue raised	Applicant's response
			Applicant intends to submit the revised draft of the Outline Battery Fire Safety Management Plan at Deadline 2. The Outline Battery Fire Safety Management Plan [APP-267] includes a risk evaluation of the BESS during its life cycle and details the Applicant's proposed measures to reduce any risks. Even without the Applicant's proposed mitigation measures, the probability of any dangerous occurrence during construction, operations and decommissioning is considered to be low. The level of detail provided within the DCO Application for the Scheme regarding the BESS supports this approach. The Applicant has provided details of the maximum parameters and design principles of the BESS where an area has been designated for the location of the BESS together with details of the maximum parameters and design principles of the BESS structures. More information can be found on this in Chapter 3: Scheme Description of the Environmental Statement [APP-035]. The Applicant is not seeking to set the detailed design of the BESS at this stage so that it is able to make use of improvements in technology that become available at a later date. In this case, technological developments will likely bring improvements in the operating efficiency of the BESS.
RR-0520, RR-0583, RR-0619, RR-0907	BESS	The technology used in the BESS is untested.	The Scheme will utilise tried and tested technology, both in the PV modules and battery energy storage systems (BESS). Any BESS battery system selected for the Scheme will have gone through the following validation / certification to demonstrate its safety. The Applicant will implement the Scheme in accordance with the measures set out in the Outline Battery Fire Safety Management Plan [APP-267].
RR-0988, RR-0996, RR-1027	Cables	The cable route will interfere with existing electrical installations.	The Applicant recognises the need for the protection of retained apparatus. To this end, it has engaged with relevant statutory undertakers prior to and following submission of the DCO application and has included measures to ensure the protection of identified retained apparatus and where appropriate. The Applicant

Parties	Issue	Summary of issue raised	Applicant's response
			has included protective provisions within the draft DCO [APP-019] . Discussions on the protective provisions are concluded in some instances and remain on going with others. Sunnica will update the Examining Authority in respect of these negotiations as the examination progresses.
RR-0181, RR-0183, RR-0256, RR-0295, RR-0460, RR-0549, RR-0568, RR-0607, RR-0642, RR-0662, RR-0706, RR-0748, RR-0884, RR-0897, RR-1142	Cables	Over 15 miles of cabling is needed to link up with the nearest substation.	Appendix 4A: Alternative Sites Assessment of the Environmental Statement [APP-054], describes the step-by-step process that has been undertaken by the Applicant to confirm that the location of the Scheme is suitable for a large-scale solar farm. This includes the requirement for the Scheme to be located in sufficient proximity to the point of connection to the National Electricity Transmission System at Burwell Substation, and avoidance of urban areas. The Scheme has been designed in such a way as to maximise the use of its grid connection. This accounts for potential energy loss and is industry standard practice. Having considered the potential loss of energy during transmission, the Applicant continues to consider that the Scheme is viable.
RR-0440, RR-1261, RR-1262, RR-1263, RR-1275	Cables	The Applicant should engage proactively with landowners regarding the design of the cable route.	The Applicant has endeavoured to engage with all landowners effected by the Scheme and where possible has taken into account any comments and requests, bearing in mind at all times the Scheme engineering requirements to ensure that the project is feasible and can be delivered. The Schedule of Negotiations [APP-025] provides details of contacts with all landowners across the Scheme from 2019 up to the time of submission. Since submission the Applicant has continued efforts to meet with landowners to discuss the cable route and explained some of the reasoning for the design and access arrangements. Further updates will be made during the examination to the Schedule of Negotiations so that the Ex A is aware of the progress of negotiations. When possible, landowners' views and requests have been accepted. Additional information regarding the requirement for rights over the land comprised in the cable route can be found in the Statement of Reasons [APP-022].
RR-0081, RR-0101, RR-0189, RR-0251, RR-	Cables	The grid connection is too long and will lead to electrical losses.	The Applicant acknowledges the potential for energy loss during the transport of energy to the connection point with the national transmission and regional distribution networks. Such losses are common across energy generating

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0361, RR-0852, RR-0871, RR-1029, RR-1096, RR-1131, RR-1269, RR-1337			stations, the Scheme has been designed taking such losses into account. Even allowing for these losses, the Scheme is viable and stands to make an important contribution to the national need for new, reliable and efficient sources of energy generation.
RR-0543	Comment	Supportive of the co-location of solar panels and battery storage.	The Applicant notes this comment.
RR-0963	Ecology	25% of the site is to be allocated and managed to improve habitats, biodiversity and carbon sequestration, aiming for at least 20% biodiversity net gain over the whole development using a recognised biodiversity metric.	The Applicant notes this comment.
RR-0009, RR-0034, RR-0121, RR-0124, RR-0130, RR-0163, RR-0326, RR-0825, RR-0907, RR-0912, RR-0944, RR-0972, RR-1102, RR-1112, RR-1128, RR-1136, RR-1206, RR-1238	General	Insufficient detail has been provided regarding the design of the Scheme.	The level of detail included within the Application is consistent with the amount of detail generally included within DCO applications. The detailed design of an NSIP has not normally taken place at the point that a DCO application is made and indeed that is the case for Sunnica. Flexibility is retained for the detailed design, but this is balanced against assessing the environmental impact of a project against known parameters. As is established practice, the Applicant assessed the Scheme's impact according to the 'Rochdale Envelope' method of the maximum parameters or impact, meaning that a worst-case scenario of the impacts of the Scheme have been assessed in the PEI Report and the Environmental Statement. It is established practice that detailed design only be finalised prior to commencement of construction. Finalisation of the detailed design will be secured by a requirement in the DCO, which will require approval by the relevant planning authority of the detailed design in accordance with documents submitted as part of the DCO Application. This includes the design principles which sets out the parameters which the environmental effects of the projects have been assessed against. The Applicant is not seeking to set the detailed design of the Scheme at this stage so that it is able to make use of improvements in technology that become available at a later date. In this case, technological

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			developments will likely bring improvements in the operating efficiency and generating potential of the Scheme.
RR-0009, RR-0021, RR-0141, RR-0648, RR-0774, RR-1167, RR-1206, RR-1230	General	Insufficient detail has been provided regarding the technology to be used for the Scheme.	As is established practice, the Applicant assessed the Scheme's impact according to the 'Rochdale Envelope' method of the maximum parameters or impact, meaning that a worst-case scenario for the impacts of the Scheme has been assessed in the PEI Report and the Environmental Statement. Further information about the 'Rochdale Envelope' method and how it is used can be found in the Planning Inspectorate's Advice Note Nine: Rochdale Envelope. An important reason for the use of the 'Rochdale Envelope' Method is so that the Applicant is able to make use of improvements in technology that become available at a later date. In this case, technological advantages could allow the Applicant to generate more renewable energy. The requirements of the DCO will be such that the Applicant must build the Scheme within the parameters that have been assessed. For this reason, it is established practice that detailed design is only finalised prior to commencement of construction. Finalisation of the detailed design will be secured by a requirement in the DCO, which will require approval by the relevant planning authority of the detailed design in accordance with documents submitted as part of the DCO Application.
RR-0228, RR-1128, RR-1246, RR-1257	General	The design of the Scheme is unsightly and unattractive.	Paragraph 4.5.1 of the National Policy Statement for Energy (EN-1) states that <i>"applying "good design" to energy projects should produce sustainable infrastructure sensitive to place, efficient in the use of natural resources and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible. It is acknowledged, however that the nature of much energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area."</i> As set out in the Design and Access Statement (DAS) [APP-264], the design of the Scheme has evolved over a six-year period from the initial feasibility study in 2015 to the DCO application submission in 2021. The design of the Scheme has been informed by consultation responses and by baseline studies and assessment of effects set out in the Environmental Statement [AAP-032 to AAP-

Parties	Issue	Summary of issue raised	Applicant's response
			259], to address negative impacts and maximise opportunities for landscape integration. The vision and objectives for the Scheme were further developed through 2019 and are set out in paragraphs 3.5.5 and 3.5.7 of the DAS. New and enhanced Green Infrastructure is a key feature of the Scheme, providing an attractive and biodiverse landscape framework within which the built elements of the Scheme will be integrated. The design also includes substantial offsets of proposed built elements from field boundaries to maximise the effectiveness of existing vegetation in providing visual screening, as illustrated in Figures 8 to 13 contained within the Landscape and Ecology Management Plan [APP-108]. As the Landscape and Visual Impact Assessment in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] demonstrates, proposed planting and careful management of existing vegetation within and on the boundaries of the Site will enclose and screen these built elements in most locations.
RR-0189, RR-0972, RR-1027	General	The design of the Scheme is inefficient and motivated principally by the availability of land.	The Applicant has set out the rationale for selecting the site in detail in the DCO application. Section 2.7 of the Planning Statement Part 1 [APP-261] sets out the main reasons for why the land within the Order limits was selected and why it is a suitable location for a large-scale solar farm. Appendix 4A, Alternative Sites Assessment (ASA) of the Environmental Statement [APP-054], describes the step-by-step process that has been undertaken by the Applicant to confirm that the location of the Scheme is suitable for a large-scale solar farm. Whilst willing land owners are an important factor for a deliverable scheme, the ASA considers environmental and planning designations, agricultural land classification, and proximity to built-up areas. In accordance with the law and guidance applying to the compulsory acquisition of land, Sunnica considers the availability of willing landowners is vital to minimise the reliance on compulsory acquisition of land. The Scheme design has also been influenced by how the Applicant has had regard to responses received through its consultation process. The Applicant considers that the Scheme design represents an appropriate response to these factors. The Scheme as designed represents a viable project that would make an important contribution to meeting the national need for large scale solar as set out in the Statement of Need [APP-260].

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RR-0078, RR-0509, RR-0775, RR-1128	General	The design is fragmented and will lead to infilling between settlements.	The Scheme primarily comprises solar PV arrays which are a maximum of 2.5 m high above ground level. It is not expected to create coalescence of settlements by virtue of either its nature or location. The iterative design process applied to the Scheme has resulted in four main scheme Sites (Sunnica East Sites A and B and Sunnica West Sites A and B). These areas have been refined based on the following key considerations (amongst others): • Landscape and visual effects and effects on heritage assets. Mitigation through offsetting from local villages and receptors of heritage value has been applied to minimise effects on local residents and heritage; • Ecology. Sensitive ecological areas have been removed from the Order Limits as well as other sensitive ecological habitats being incorporated into the Order Limits for enhancement but removed from the developable area; • Archaeology. The geophysical and trial trenching survey results showed areas of archaeological potential throughout the Scheme. These have been set aside from the developable area to ensure no impacts to archaeology from the Scheme's infrastructure. Any planning application for development between settlements will be decided on its own merits, in accordance with the applicable policy framework. The Scheme will not create a permanent change of land use that would impact the way other planning applications are considered.
RR-1176	Impact on infrastructure	Not satisfied at this stage that the current proposed scheme is deliverable taking into consideration the impacts on Cadent's existing apparatus and rights of access to maintain its network and requests that the design is amended to	The Applicant has been negotiating protective provisions with Cadent to ensure that its statutory undertaking is not subject to serious detriment as a result of the proposed development. Those protective provisions are now very close to being agreed and will be included in the next version of the DCO which will be submitted into the examination.

Parties	Issue	Summary of issue raised	Applicant's response
		remove solar panels from its existing easement strips.	
RR-0169, RR-0194, RR-0195, RR-0211, RR-0217, RR-0228, RR-0233, RR-0243, RR-0259, RR-0263, RR-0277, RR-0322, RR-0334, RR-0363, RR-0386, RR-0390, RR-0409, RR-0428, RR-0430, RR-0432, RR-0436, RR-0438, RR-0444, RR-0495, RR-0500, RR-0519, RR-0529, RR-0537, RR-0549, RR-0565, RR-0621, RR-0640, RR-0657, RR-0669, RR-0705, RR-0722, RR-0727, RR-0734, RR-0748, RR-0772, RR-0816, RR-0827, RR-0839, RR-0840, RR-0842, RR-0880, RR-0884, RR-0896,	Materials	The Scheme makes too much use of concrete.	The Scheme is answering an urgent national need for forms of low carbon, renewable energy generation. Our proposals will require the use of concrete foundations in some areas. Elements that will require the use of concrete foundations include the solar stations, water tanks, substations and the battery energy storage system (BESS) in some locations. The total area that will require a concrete base will be dependent upon the final project design but regardless, it will be a small portion of the entire Scheme. The impact of GHG emissions arising as a result of the Scheme on the climate has been assessed as part of Chapter 6: Climate Change of the Environmental Statement [APP-038]. The Scheme has been assessed to have a Major Beneficial effect on the climate (see Chapter 5: EIA Methodology [APP-037] for a definition of the terminology used to describe residual effects). The overall beneficial impact of the Scheme is considered to offset any greenhouse gas emissions during the Scheme's lifetime.

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RR-0899, RR-0930, RR-0932, RR-0939, RR-0989, RR-0996, RR-1024, RR-1033, RR-1084, RR-1096, RR-1108, RR-1121, RR-1148, RR-1152, RR-1166, RR-1202, RR-1213, RR-1238, RR-1265, RR-1297			
RR-0902	Materials	The BESS makes use of toxic materials which are potentially harmful.	The potential for emissions of toxic fumes from a BESS fire has been assessed in Appendix 16D of the Environmental Statement [APP-124]. This study reviews the potential emissions to air from out-gassing and from fire and considers the potential magnitude of emissions and the likely consequences of emissions to air from BESS. This assessment has concluded that, should all the systems fail and a large-scale fire break out within one of the BESS containers, then the resultant hydrogen fluoride concentration at the closest receptors would be below the level that Public Health England has identified as resulting in notable discomfort to members of the general population. The Unplanned Atmospheric Emissions from Battery Energy Storage Systems (BESS) document [APP-124] has been updated. The Applicant intends to submit the revised draft of the document at Deadline 2.
RR-0835	Mitigation	The design of the scheme doesn't include sufficient setbacks from public rights of way and roads.	The design has been green infrastructure led through an iterative process. Key considerations for the design included:

Parties	Issue	Summary of issue raised	Applicant's response
			• Landscape and visual effects and effects on heritage assets. Mitigation through a minimum offsetting of 20m from local villages, roads and Public Rights of Way to minimise effects on local residents and heritage assets; • Ecology. Sensitive ecological areas have been removed from the Order limits as well as other sensitive ecological habitats being incorporated into the Order limits for enhancement but removed from the developable area; • Archaeology. The geophysical and trial trenching survey results showed areas of archaeological potential throughout the Scheme. These have been set aside from the developable area to ensure no impacts to archaeology from the Scheme's infrastructure. The offsets are considered appropriate for the Scheme; however, Landscape and Visual Impact Assessment in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] acknowledges that there will be some adverse landscape effects due to visual effects on users of the limited number of public rights of way and roads in the area during construction and operation. Mitigation is proposed, including planting to assist in integrating the Scheme into the existing landscape pattern and for visual screening and the provision of permissive public recreation routes to enhance access to the countryside, as shown in Figures 10-14a to 10-14f of the Environmental Statement [APP-209 to APP-214].
RR-0054, RR-0963	PV panels	The land under the PV panels should be used for agriculture.	Grassland below and between solar panels can be grazed by sheep or other small livestock as outlined and committed to in the Outline Landscape and Ecology Management Plan (OLEMP) [APP-108] . As outlined in the Outline Landscape and Ecology Management Plan (OLEMP) [APP-108] the Scheme delivers a significant net gain for biodiversity. See ES paragraph 8.1.6. [APP-040] .
RR-0002, RR-0006, RR-0007, RR-0009, RR-	Scale	The Scheme is too large.	Chapter 5 of the Statement of Need [APP-260] demonstrates that electricity demand will double by 2050 because of the need to decarbonise energy use in other sectors, e.g. heat and transport. Chapter 6 of the Statement of Need [APP-260] concludes that significant additional generation capacity is therefore needed

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0010, RR-0015, RR-0019, RR-0024, RR-0037, RR-0041, RR-0012, RR-0013, RR-0014, RR-0017, RR-0034, RR-0039, RR-0040, RR-0044, RR-0045, RR-0050, RR-0055, RR-0057, RR-0058, RR-0059, RR-0061, RR-0064, RR-0065, RR-0067, RR-0069, RR-0070, RR-0076, RR-0077, RR-0080, RR-0081, RR-0082, RR-0083, RR-0086, RR-0088, RR-0095, RR-0097, RR-0099, RR-0103, RR-0105, RR-0106, RR-0112, RR-0113, RR-0114, RR-0118, RR-0121, RR-0124, RR-0127, RR-0129, RR-0132, RR-0134, RR-0140, RR-			in the UK and large-scale solar will deliver an important contribution to meeting that need. The Scheme is a new solar energy farm proposal that would deliver electricity to the National Electricity Transmission System. Section 7.6 of the Statement of Need [APP-260] expands on the Government's view that large-scale, centralised electricity generating facilities which are connected to the high voltage transmission system are and will remain important in the UK because they enable the pooling of both generation and demand, which in turn offers a number of economic and other benefits, such as more efficient bulk transfer of power and enabling surplus generation capacity in one area to be used to cover shortfalls elsewhere. Section 6.4 of the Statement of Need [APP-260] covers site assessment and selection for large-scale solar in the UK. Given the overwhelming and urgent need for solar as set out in the Statement of Need, suitable locations must be found for solar development. Paragraph 6.4.6 of the Statement of Need [APP-260] demonstrates that the proposed location is a suitable site, and the efficient detailed design provides for an asset which is consistent with the Government's view of best practice ratios of land take and installed capacity. In order to meet the need for significant levels of additional generation capacity to be deployed to deliver net zero, it will be necessary to develop all sites which have been identified and assessed as suitable.

Parties	Issue	Summary of issue raised	Applicant's response
0149, RR-0151, RR-0154, RR-0155, RR-0160, RR-0161, RR-0170, RR-0174, RR-0180, RR-0181, RR-0182, RR-0186, RR-0189, RR-0190, RR-0193, RR-0194, RR-0194, RR-0198, RR-0199, RR-0211, RR-0216, RR-0219, RR-0224, RR-0225, RR-0226, RR-0229, RR-0232, RR-0236, RR-0237, RR-0238, RR-0240, RR-0243, RR-0246, RR-0252, RR-0254, RR-0265, RR-0267, RR-0268, RR-0270, RR-0273, RR-0277, RR-0278, RR-0280, RR-0281, RR-0283, RR-0284, RR-0292, RR-0294, RR-0297, RR-0300, RR-0303,			

Parties	Issue	Summary of issue raised	Applicant's response
RR-0307, RR-0313, RR-0314, RR-0323, RR-0327, RR-0328, RR-0330, RR-0331, RR-0334, RR-0337, RR-0338, RR-0345, RR-0391, RR-0393, RR-0397, RR-0401, RR-0406, RR-0409, RR-0410, RR-0411, RR-0412, RR-0414, RR-0417, RR-0418, RR-0419, RR-0421, RR-0425, RR-0426, RR-0431, RR-0432, RR-0434, RR-0435, RR-0440, RR-0442, RR-0450, RR-0452, RR-0457, RR-0465, RR-0466, RR-0471, RR-0476, RR-0488, RR-0491, RR-0497, RR-0498, RR-0502, RR-0506, RR-0508, RR-0509, RR-0510, RR-0511,			

Parties	Issue	Summary of issue raised	Applicant's response
RR-0514, RR-0515, RR-0519, RR-0523, RR-0524, RR-0525, RR-0528, RR-0534, RR-0535, RR-0536, RR-0545, RR-0546, RR-0550, RR-0555, RR-0556, RR-0568, RR-0570, RR-0572, RR-0576, RR-0577, RR-0578, RR-0581, RR-0582, RR-0584, RR-0586, RR-0604, RR-0607, RR-0610, RR-0614, RR-0615, RR-0616, RR-0622, RR-0623, RR-0624, RR-0627, RR-0628, RR-0629, RR-0630, RR-0633, RR-0634, RR-0635, RR-0636, RR-0639, RR-0642, RR-0643, RR-0649, RR-0657, RR-0659, RR-0660, RR-0662, RR-0671,			

Parties	Issue	Summary of issue raised	Applicant's response
RR-0673, RR-0675, RR-0685, RR-0686, RR-0694, RR-0699, RR-0702, RR-0703, RR-0708, RR-0709, RR-0710, RR-0712, RR-0717, RR-0721, RR-0722, RR-0729, RR-0740, RR-0741, RR-0742, RR-0749, RR-0754, RR-0759, RR-0761, RR-0762, RR-0764, RR-0766, RR-0767, RR-0771, RR-0773, RR-0775, RR-0778, RR-0779, RR-0790, RR-0792, RR-0793, RR-0795, RR-0797, RR-0799, RR-0802, RR-0803, RR-0810, RR-0814, RR-0817, RR-0818, RR-0825, RR-0827, RR-0831, RR-0839, RR-0842, RR-0845, RR-0852,			

Parties	Issue	Summary of issue raised	Applicant's response
RR-0853, RR-0855, RR-0864, RR-0867, RR-0868, RR-0871, RR-0875, RR-0876, RR-0878, RR-0879, RR-0882, RR-0888, RR-0890, RR-0892, RR-0900, RR-0901, RR-0904, RR-0906, RR-0915, RR-0922, RR-0925, RR-0926, RR-0933, RR-0938, RR-0939, RR-0942, RR-0963, RR-0969, RR-0972, RR-0974, RR-0975, RR-0977, RR-0979, RR-0984, RR-0985, RR-0986, RR-0987, RR-0989, RR-0996, RR-0999, RR-1000, RR-1002, RR-1003, RR-1011, RR-1016, RR-1019, RR-1021, RR-1027, RR-1028, RR-1029, RR-1032,			

Parties	Issue	Summary of issue raised	Applicant's response
RR-1035, RR-1037, RR-1040, RR-1053, RR-1064, RR-1065, RR-1066, RR-1069, RR-1070, RR-1071, RR-1076, RR-1077, RR-1086, RR-1090, RR-1095, RR-1101, RR-1102, RR-1104, RR-1105, RR-1120, RR-1126, RR-1128, RR-1129, RR-1130, RR-1131, RR-1134, RR-1141, RR-1150, RR-1151, RR-1156, RR-1157, RR-1159, RR-1160, RR-1162, RR-1169, RR-1172, RR-1182, RR-1188, RR-1189, RR-1190, RR-1191, RR-1193, RR-1200, RR-1201, RR-1202, RR-1205, RR-1206, RR-1212, RR-1218, RR-1220, RR-1221,			

Parties	Issue	Summary of issue raised	Applicant's response
RR-1223, RR-1224, RR-1227, RR-1228, RR-1229, RR-1230, RR-1234, RR-1238, RR-1240, RR-1242, RR-1245, RR-1247, RR-1250, RR-1251, RR-1254, RR-1258, RR-1265, RR-1266, RR-1269, RR-1270, RR-1279, RR-1280, RR-1285, RR-1293, RR-1294, RR-1296, RR-1299, RR-1303, RR-1304, RR-1305, RR-1307, RR-1313, RR-1315, RR-1317, RR-1322, RR-1323, RR-1324, RR-1325, RR-1326, RR-1327, RR-1330, RR-1335, RR-1342, RR-1353, RR-1360			
RR-0314, RR-0318, RR-0504,	Scale	The size of the Scheme is out of keeping with the local area.	Section 6.4 of the Statement of Need [APP-260] covers site assessment and selection for large-scale solar in the UK. Given the overwhelming and urgent need for solar as set out in the Statement of Need, suitable locations must be

Parties	Issue	Summary of issue raised	Applicant's response
RR-1016, RR-1037, RR-1064			found for solar development. In order to meet the significant capacity growth projections, it will be necessary to develop all sites which have been identified and assessed as suitable. In particular, Paragraph 6.4.6 of the Statement of Need [APP-260] demonstrates that the proposed location is a suitable site, and the efficient detailed design provides for an asset which is consistent with government's view of best practice ratios of land take and installed capacity. The National Policy Statement EN-1, states '<i>consenting new energy infrastructure in accordance with the energy NPSs is likely to lead to adverse effects which cannot always be satisfactorily mitigated is in respect of landscape and visual effects.</i>' However, it goes on to state that '<i>The applicant should carry out a landscape and visual assessment and report it in the ES.</i>' Therefore, Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] assesses the effects of the Scheme at a landscape scale. Some significant effects have been identified at the landscape scale, however embedded mitigation measures (including areas set aside for landscape offset and habitat creation, as well as vegetation planting to provide screening) have been included as far as practicable to ensure that these effects are minimised.
RR-0703	Scale	Concern that the Scheme could become larger in the future.	The Applicant is applying for development consent for the works set out in Schedule 1 of the draft DCO [AAP-019] and shown on the Works Plans [APP-007]. Any additional works are outside of the scope of the Application and would therefore not be authorised by the Development Consent Order. Any future aspirations to expand the project, which does not currently exist, would require a new application to the Secretary of State, or if it is a scheme <50MW as an application to the relevant planning authority.
RR-0117, RR-0534, RR-0607, RR-0659, RR-0825, RR-0835, RR-0972, RR-1102, RR-1128,	Scale	The sprawling nature of development exacerbates its negative impacts.	The Applicant has followed a step-by-step process which confirms the location of the Scheme is suitable for a large scale solar farm. Details of the process are set out in Appendix 4A Alternative Sites Assessment [APP-054] and includes the reasons for selecting the area of search from Burwell National Grid Substation and how suitable land within the area of search has

Parties	Issue	Summary of issue raised	Applicant's response
RR-1136, RR-1206, RR-1315			been identified. The latter includes the process of excluding various planning and environmental constraints. All potential environmental impacts and effects have been assessed within the Environmental Impact Assessment taking into account the effects from all four sites in-combination (Sunnica East Site A, Sunnica East Site B, Sunnica West Site A and Sunnica West Site B).
RR-0169, RR-0567, RR-0607, RR-0865, RR-0963	Scale	It would be preferable to have a series of smaller schemes.	Section 9.3 of the Statement of Need [APP-260] describes the importance of large-scale solar projects within the UK generation mix that are better placed to meet UK demand than a renewable generation portfolio which does not include solar generation. Figure 9-6 of the Statement of Need shows the results of an analysis which illustrates that development of one large solar scheme brings carbon savings and economic benefits versus developing combinations of smaller independent schemes. Further, Section 7.5 of the Statement of Need [APP-260] describes the differences between smaller schemes and larger schemes in terms of how they connect to electricity networks and how they contribute to national electricity demand. Although smaller schemes which will connect to distribution networks will contribute to meeting carbon emissions targets, the government does not believe they will replace the need for new large-scale electricity infrastructure to meet UK energy objectives. The need for smaller schemes is therefore in addition to, and not instead of, the need for large-scale schemes. The development of large-scale schemes is essential in order to connect the scale of new capacity required to meet net zero requirements.
RR-0005, RR-0024, RR-0055, RR-0057, RR-0065, RR-0066, RR-0109, RR-0162, RR-0164, RR-0167, RR-	Scale	The BESS is too large.	Battery Energy Storage Systems (BESS) have an important role in improving the match between the supply of and demand for power. There is a direct relationship between the principal element of the project – the solar generation – and the associated development – the BESS insofar as the associated BESS supports the operation of the principal development by providing the ability to store Sunnica's solar generation when it is not needed, and releasing it when it is needed.

Parties	Issue	Summary of issue raised	Applicant's response
0279, RR-0281, RR-0289, RR-0295, RR-0296, RR-0299, RR-0305, RR-0442, RR-0513, RR-0534, RR-0556, RR-0564, RR-0584, RR-0651, RR-0676, RR-0799, RR-0810, RR-0822, RR-0862, RR-0863, RR-0891, RR-0896, RR-0899, RR-0902, RR-0906, RR-0907, RR-1064, RR-1076, RR-1099, RR-1112, RR-1128, RR-1134, RR-1160, RR-1177, RR-1298, RR-1331			As growing capacities of renewable energy displace conventional generation from the grid, National Grid's Future Energy Scenarios (FES) show the growing need for BESS as part of the UK's electricity system. The FES is introduced in the Statement of Need [APP-260], Chapter 5.1. The FES foresees that the installed capacity of flexible generation (GW) is needed in approximately equal measure with renewable generation, to support additional renewable generation onto the grid. If at the system level, BESS capacity is needed in approximately equal measure with renewable generation capacity, then Sunnica (and other renewable generators) should mitigate their impacts of the renewable capacity they introduce by developing associated infrastructure of a similar capacity as that of the principal development. Paragraphs 7.3.3 and 7.3.4 of the Statement of Need [APP-260] provide additional support to this point. Not all solar developments have import capacity (an essential requirement for BESS operations) and therefore not all solar developments are able to co-locate with batteries. It is therefore important for the UK's decarbonisation that developments with import and export connections to the National Electricity Transmission System include batteries, such that the scale of deployment foreseen in the FES (shown in the previous figure) is achieved. Indeed, in its April 2022 British Energy Security Strategy, the Government stated that it would "support solar that is co-located with other functions (e.g. storage) to maximise the efficiency of land use. Co-location also maximises the efficiency of grid connections, which are a fundamental enabler of decarbonisation. Sunnica Energy Farm holds a Grid Connection Agreement with National Grid ESO for 500MW of import power, and 500MW of export power. The principal solar development has been designed to optimise both land use and grid connection capacity. A rational view of the associated BESS development would be that its maximum power capacity would be capped at the grid connection capacity, it therefore

Parties	Issue	Summary of issue raised	Applicant's response
			follows that the associated BESS development would be at most equal in capacity to the principal solar development, and no higher. BESS is also constrained by land area available for development. Sunnica has three sites which are suitable for BESS deployment, totalling 311,000 m². A containerised BESS solution (1MW / 1MWh per container) would have a footprint of 85 m² (17m x 5m) and would be spaced out such that approximately one third of the land would be used for BESS containers. This means that approximately 1,200 containers – or 1.2GWh of electrical energy storage capacity – could be located on site. Physical characteristics therefore constrain BESS at Sunnica to be no greater than a 2.5 hour, 500MW solution. At a 10% load factor, a 500MW solar farm would generate 438GWh/Yr, or c. 1.2GWh/Day. The land allocated for solar at Sunnica therefore permits the development of a BESS which has the potential to store electricity produced on one average day from the principal solar facility. From both a power and energy storage capacity, the associated BESS is proportionate to the scale of the principal solar development.
RR-0205, RR-0549, RR-0579, RR-0703	Substation	Concern about the proposal for a new substation.	The Scheme will be connecting into the existing substation at Burwell. Options 1 and 2 as originally submitted involve extensions to the existing infrastructure to facilitate the Scheme's connection to the national electricity transmission system. Following acceptance of the Application, the Applicant received updated information from National Grid Electricity Transmission (NGET) which stated that the Burwell National Grid Substation Extension – Option 1 was no longer 'technically feasible'. This was subsequently affirmed by NGET's relevant representation [RR-1289]. Following this, the Applicant has looked afresh at the technical solutions to connect Sunnica Energy Farm into the NGET infrastructure at Burwell to seek to minimise compulsory acquisition requirements and environmental effects. This design work has resulted in the identification of an additional option for the grid connection, 'Option 3'. Option 3 involves the

Parties	Issue	Summary of issue raised	Applicant's response
			provision of 33kV/400kV transformers at each of the onsite substation locations within Sunnica East Site A, Sunnica East Site B and Sunnica West Site A (as originally proposed). Option 3 would therefore involve no new substation nor an extension to the existing National Grid substation at Burwell. This is the Applicant's preferred option for facilitating the Scheme's connection to the national electricity grid, subject to the Examining Authority accepting the Applicant's application to make changes to the content of its DCO application. It has made an application to the Ex A to change the Scheme to include Option 3 and remove Option 1. The substation arrangements for Option 3 are within the parameters specified in the ES Scheme Description [APP-035]. The Applicant has progressed discussions with NGET with a view to confirming that Option 3 is acceptable to NGET. Until this option is confirmed as feasible by NGET, Burwell National Grid Substation Option 2 – which would involve an extension to the Burwell National Grid Substation – will remain within the Scheme. Both options have been assessed as part of the Environmental Statement and changes application and, where significant effects are identified, the Applicant is proposing mitigation. Once formal written confirmation is received from National Grid that Option 3 is acceptable, the Applicant proposes to remove Option 2 from the Scheme.
RR-0091	Substation	Option 1 is too close to homes in Burwell.	The Applicant has made an application to change its DCO application to remove the Burwell National Grid Substation Extension – Option 1 from the Scheme following the Relevant Representation from NGET. The preferred alternative option is to provide 33kV/400kV transformers at each of the onsite substation locations within Sunnica East Site A, Sunnica East Site B and Sunnica West Site A. However, until this option is confirmed as feasible by NGET, Burwell National Grid Substation – Option 2, which is located 450m from the closest receptor in Burwell, will remain within the Scheme. Based on these changes, there are not anticipated to be any significant noise effects for residents within Burwell during construction or operation.

Parties	Issue	Summary of issue raised	Applicant's response
RR-1274	Substation	The Option 1 connection is not technically feasible given the amount of land now required by the Applicant, the planned extension of the substation and NGET's license obligations. Option 2 will therefore need to be taken forward. NGET would ask that Option 1 is removed from the DCO.	Whilst the Applicant devised Option 1 in conjunction with NGET, holding regular technical and design meetings, the Applicant has consulted on, and applied to make changes to its application. If that application is accepted, then the effect of the changes to the application would result in the removal of Option 1 and the introduction of a new Option 3 that would remove the requirement for a substation located in the immediate vicinity of the National Grid Burwell Substation. Subject to receiving NGET's confirmation that Option 3 is acceptable, the Applicant proposes to remove Option 2 from the Scheme.
RR-0539	Technology	The Scheme is too specific about design and will not be able to take advantage of technological advances.	As is established practice, the Applicant assessed the Scheme's impact according to the 'Rochdale Envelope' method of the maximum parameters or impact, meaning that a worst-case scenario for the impacts of the Scheme has been assessed in the PEI Report and the Environmental Statement. It is established practice that detailed design only be finalised prior to commencement of construction. Finalisation of the detailed design will be secured by a requirement in the DCO, which will require approval by the relevant planning authority of the detailed design in accordance with documents submitted as part of the DCO Application. This allows the Scheme to take advantage of technological advances.

3.6 Consultation

3.6.1 240 individual comments were received in relation to the consultation process.

Applicant's responses to RRs relating to the consultation

Parties	Issue	Summary of issue raised	Applicant's response
RR-0009, RR-0012, RR-0044, RR-0049, RR-	Adequacy of consultation	Pre-application consultation was inadequate. This has included a failure to meet with residents and	The Applicant has consulted in a way that meets its obligations set out in the SoCC, the Planning Act 2008 and other relevant regulations. This was confirmed as adequate through the acceptance of the DCO Application for Examination.

0064, RR-0071, RR-0077, RR-0082, RR-0084, RR-0085, RR-0092, RR-0098, RR-0106, RR-0109, RR-0112, RR-0113, RR-0121, RR-0124, RR-0134, RR-0147, RR-0151, RR-0156, RR-0163, RR-0170, RR-0172, RR-0189, RR-0202, RR-0207, RR-0220, RR-0226, RR-0229, RR-0237, RR-0243, RR-0267, RR-0280, RR-0297, RR-0303, RR-0308, RR-0312, RR-0324, RR-0331, RR-0362, RR-0391, RR-0429, RR-0433, RR-0439, RR-0441, RR-0477, RR-0498, RR-0525, RR-0539, RR-0570, RR-0587, RR-0622, RR-0624, RR-0636, RR-0666, RR-0676, RR-0683, RR-0686, RR-0692, RR-		their elected representatives in person as part of consultation.	The Applicant has also met with residents and elected representatives regularly, both before the submission of the DCO Application and afterwards. This included a programme of public exhibitions during the non-statutory consultation, as set out in Chapter 2 of the Consultation Report [APP-026] .

0703, RR-0716, RR-0721, RR-0764, RR-0770, RR-0774, RR-0782, RR-0786, RR-0793, RR-0798, RR-0804, RR-0817, RR-0819, RR-0881, RR-0912, RR-0944, RR-0963, RR-0969, RR-0976, RR-0983, RR-0984, RR-1015, RR-1017, RR-1029, RR-1034, RR-1051, RR-1066, RR-1090, RR-1101, RR-1102, RR-1131, RR-1141, RR-1150, RR-1167, RR-1177, RR-1206, RR-1230, RR-1238, RR-1239, RR-1287, RR-1314, RR-1354			
RR-0009, RR-0038, RR-0109, RR-0143, RR-0161, RR-0297, RR-0303, RR-0334, RR-0359, RR-0507, RR-0533, RR-0564, RR-0567, RR-0665, RR-0701,	Adequacy of consultation	There has been limited communication with residents.	The Applicant disagrees. It has conducted an extensive programme of pre-application consultation and engagement with the local community, including two rounds of consultation and updates outside of consultation period. This activity is set out in the Consultation Report [APP-026] . The Planning Inspectorate found that the Applicant had complied with its pre application consultation requirements when it accepted the Application for Examination.

RR-0723, RR-0729, RR-0753, RR-0870, RR-0889, RR-0941, RR-0990, RR-1028, RR-1029, RR-1066, RR-1078, RR-1127, RR-1128, RR-1141, RR-1184, RR-1206			
RR-0009	Adequacy of consultation	The Applicant has not consulted with landowners.	The Applicant disagrees as this is not the case. The Applicant consulted with people with an interest in land as defined by s42(1)(d) of the Planning Act 2008 as set out in 4.3.5 - 4.3.22 of the Consultation Report [APP-026] .
RR-0028, RR-0082, RR-0536, RR-0654, RR-1009, RR-1075, RR-1115	Consultation	Sunnica's approach lacks care about local communities.	The Applicant has consulted extensively with the local community and has had regard to all the feedback it received, as set out in the Consultation Report [APP-026] and Consultation Report Appendices J-1 to J-5 [APP-030]. In having regard to this feedback, the Applicant has made significant amendments to the Scheme design as set out within the Consultation Report. The Applicant has also carried out an environmental impact assessment (EIA) to identify potential environmental effects and, where significant effects have been identified, every effort has been made to minimise and mitigate these effects. Further information is provided within the Environmental Statement documents [AAP-032 to AAP-259].
RR-0829	Consultation	The views of experts are being ignored.	The Applicant does not agree with this statement. The Application is being brought forward by a project team of subject matter experts advised by consultants who are 'best in class' environmental, land referencing, land agency, consultation and public affairs, legal and technical specialists. Environmental Statement Appendix 1C: Statement of Competence [APP-053] sets out details of the environmental expertise of the authors of the Environmental Statement. The development of the Scheme has been informed by these experts and has been further refined through the consultation and engagement carried out by the

			Applicant. Further information on how the Scheme design has evolved through consultation can be found in the Design and Access Statement [APP-264] .
RR-0012, RR-0026, RR-0064, RR-0092, RR-0099, RR-0109, RR-0113, RR-0258, RR-0267, RR-0296, RR-0359, RR-0362, RR-0539, RR-0548, RR-0666, RR-0889, RR-1095, RR-1230, RR-1277, RR-1316	Consultation	There has not been enough face-to-face engagement by the Applicant.	The Applicant has engaged extensively both prior to and after submitting the Application. This has included in-person events during the non-statutory consultation in 2019 and during the changes consultation in June 2022. While there were restrictions on meeting in person during the statutory consultation, due to coronavirus pandemic imposed rules, the Applicant provided a number of different means for anyone with an interest in the proposals to engage with the project team, including individual telephone appointments and webinars. The Applicant considers this to have been appropriate, which was confirmed with the acceptance of the Application for Examination. Further information on the Applicant's pre-application consultation can be found in the Consultation Report [APP-036] .
RR-0174, RR-0189, RR-0207, RR-0274, RR-0889	Consultation	Sunnica have refused to undertake any direct dialogue with Isleham residents.	The Applicant disagrees with this assessment. The Applicant's consultation activity during the non-statutory consultation included an event in Isleham, a letter publicising the consultation was posted to addresses in Isleham, and Isleham Parish Council was notified of the consultation. Further information on the non-statutory consultation can be found in the Consultation Report [APP-036]. During the statutory consultation the Applicant wrote to addresses within Isleham to provide a copy of the consultation booklet, which outlined the different ways that anyone with an interest could take part in the consultation. This included individual telephone appointments and webinars. The Applicant therefore considers that there has been direct dialogue with Isleham residents throughout this process.
RR-0308, RR-0539, RR-0548, RR-0550, RR-1206	Consultation	The consultation discriminated against people without internet access.	During the statutory consultation, the Applicant provided a variety of means through which people without internet access could take part in the consultation. These included the direct mailout of a consultation booklet to over 10,000 addresses in the area around the Scheme, and the opportunity to hold a booked telephone conversation with members of the project team. Further information on the Applicant's pre-application consultation can be found in the Consultation Report [APP-036] .

RR-0009, RR-0034, RR-0121, RR-0124, RR-0130, RR-0163, RR-0539, RR-0713, RR-0825, RR-0831, RR-0907, RR-0912, RR-0944, RR-0972, RR-0976, RR-1112, RR-1136, RR-1238	Consultation information	The information presented through pre-application consultation was inadequate. This has included plans which are hard to read.	The Applicant disagrees with this assessment. Where consultees requested maps in larger formats, the Applicant provided copies. The Applicant considers that the consultation brochure provided an appropriate, non-technical, overview of the scheme. The Applicant consulted in accordance with the Statement of Community Consultation (SoCC), further details of the Applicant's consultation activity can be found in the Consultation Report [APP-026] and the Applicant's consultation materials can be found in appendices G-1-G-4 of the Consultation Report [APP-029] .
RR-0541	Consultation information	The application is so large it would take months to read.	The Applicant considers the application to be of the right size to ensure that sufficient detail has been provided to the Examining Authority and Stakeholders when they are considering the Application, and it reflects what is required by policy and legislation. The EIA contains the largest volume of documents, and the Applicant considers this to provide an appropriate level of assessment and reporting for the Scheme. The Non-Technical Summary of the Environmental Statement [APP-256] provides a summary of this information designed to be accessible to non-technical audiences.
RR-0539, RR-0819	Consultation information	Consultation information was misleading and produced by consultants paid by the Applicant.	The consultation materials, along with the Applicant's DCO application, have been produced by appropriately qualified technical specialists. A Statement of Competence has been submitted in Appendix 1C of the Environmental Statement [APP-053], which details the experience of each of the technical leads for the disciplines that contributed to the EIA. The Applicant does not consider that the consultation information is misleading. The comment lacks specificity and so it is not possible to respond on this comment in any detail.
RR-0463, RR-0996	Information	The drawings do not show existing and proposed developments which presents a misleading image of local impact.	The Applicant has provided sufficient information within the Application to enable assessment of cumulative effects and has considered other developments. Further information can be found in Chapter 17: Effect Interactions of the Environmental Statement [APP-049] .
RR-0824, RR-0889	Materials	I did not receive letters from Sunnica despite living close by.	The Applicant wrote to all addresses within Consultation Zone 1 as set out in the Statement of Community Consultation published ahead of the statutory

			consultation. Further information can be found in the Consultation Report [APP-026] .
RR-0006, RR-0013, RR-0028, RR-0029, RR-0087, RR-0094, RR-0130, RR-0161, RR-0186, RR-0226, RR-0262, RR-0267, RR-0296, RR-0345, RR-0429, RR-0525, RR-0631, RR-0648, RR-0654, RR-0676, RR-0686, RR-0698, RR-0766, RR-0797, RR-0849, RR-0857, RR-0907, RR-0921, RR-0944, RR-0958, RR-0978, RR-0983, RR-1015, RR-1034, RR-1064, RR-1124, RR-1130, RR-1150, RR-1206	Regard to feedback	The Applicant has done little to address concerns raised through pre-application consultation or to respond to questions from the community.	The Applicant has had regard to all consultation responses that it received, as demonstrated by the Consultation Report [APP-026]. In accepting our DCO application for Examination, the Planning Inspectorate deemed that our pre-application consultation has been adequate. The Applicant has shown in the DCO Application the changes it has made to the Scheme in response to consultation responses received. As a result of its consultation activity, the Applicant made a number of changes to the Scheme, including: • Removing areas bordering the south of Worlington from solar development. This has increased the distance between the solar sites and homes. • Removing areas between Isleham and Freckenham from solar development. Alongside land to the south of Worlington, these areas are now proposed for use as mitigation habitats. These areas are marked ECO1, ECO2 and ECO3 on Figure 3-1 of the ES [APP-135]. • Moving the Battery Energy Storage System (BESS) proposed at Sunnica East further away from Ferry Lane to mitigate its visual impact. • Proposing a new permissive route to improve connectivity between settlements. Further information on the design changes that the Applicant has made in response to the feedback that it has received is given in the Design and Access Statement [APP-264]. The Applicant has always endeavoured to respond to enquiries. As is common with many projects of this nature, it is not always possible to provide certain details until the detailed design stage. Where it has not been possible to provide certain details, the Applicant has explained why.
RR-0324	Consultation	The Charity owns and has registered title of 7 acres immediately adjacent (within 50 metres) to the proposed Sunnica A	After carrying out diligent inquiry, the Applicant does not believe that the Charity holds an interest within the current Order Limits and therefore would not be categorised as a consultee under s42(1)(d). The Applicant would welcome any

		East site. This land is to the north of the proposals adjacent to the Lee Brook in Isleham. There has been no notification of the proposals from Sunnica to the Charity and consequently no consultation as to its impact to the Charity's land as an immediate neighbour. This disregard of the Charity as immediate neighbours does not fit with Sunnica's statements in the Consultation Report EN010106/APP/5 relating to the identification of consultees. under s42(1)(d) Paras 4.3.5 to 4.3.9.	further information from the Charity to clarify its land holding in relation to the Scheme in the mentioned location.

3.7 EIA Process

3.7.1 71 individual comments were received in relation to the EIA process.

Applicant's responses to RRs relating to EIA process

Parties	Issue	Summary of issue raised	Applicant's response
RR-0163, RR-0172, RR-0598, RR-0845, RR-1128, RR-1155	Assessment	The impact on the community, including resident amenity and well-being has not been properly assessed.	From the perspective of amenity, the Applicant's assessment found that there are no residential properties that would likely experience a significant effect on their amenity during the construction or operation phase. These findings can be found in Chapter 12: Socio-economics and Land Use of the Environmental Statement [APP-044]. They take into account the results of the air quality, noise, transport and visual assessments. An assessment of effects on well-being has been undertaken as part of the human health assessment, see Chapter 15: Human Health of the Environmental Statement [APP-047], which has considered the potential positive and negative outcomes of the Scheme in respect of several determinants of well-being. These includes air

Parties	Issue	Summary of issue raised	Applicant's response
			quality, noise and neighbourhood amenity, accessibility and active travel and social cohesion and lifetime neighbourhoods. The assessment is based on best practice guidance including from Healthy Urban Development Unit (HUDU) / NHS England and the Government's Good Practice Guide for EIA and are considered to reflect best practice.
RR-1128	Assessment	The assessments of hydrology, flood management and drainage are inadequate.	The Flood Risk Assessment [AS-007 to AS-010] has been undertaken following guidance as provided within the National Planning Policy Framework documents and National Planning Statements (Current and Draft versions of NPS EN-1 and EN-3 where appropriate), and in consultation with the Environment Agency and the local Lead Local Flood Authorities.
RR-0155, RR-0239, RR-0934, RR-1043, RR-1102, RR-1109, RR-1125, RR-1128, RR-1136, RR-1142, RR-1237, RR-1254, RR-1285, RR-1314, RR-1316	Assessment methodology	There is a lack of detail on topics including size, visual impact, ecology and site selection throughout the EIA. This makes it difficult to assess the environmental impacts of the Scheme.	The Applicant respectfully disagrees with this comment and considers that the topics listed in this comment are assessed to the required sufficient level of detail within the EIA. It is recommended that the following parts of the Environmental Statement and associated appendices are reviewed: • Chapter 3: Scheme Description [APP-035] for details on the maximum and minimum sizes of various elements of the Scheme; • Chapter 4: Alternatives and Design Evolution [APP-036] and Appendix 4A Alternative Site Assessment [APP-054] for details of the site selection process; • Chapter 8: Ecology and Nature Conservation [APP-040] for an assessment of the ecology impacts of the Scheme; • Chapter 10: Landscape and Visual Amenity [APP-042] for an assessment of the landscape and visual impacts of the Scheme.
RR-1238	Assessment methodology	The EIA should be carried out by an independent third-party.	The EIA has been undertaken by AECOM, an independent third-party consultancy commissioned by the Applicant – a statement of competence for each topic is set out in Appendix 1C to the Environmental Statement [APP-053] . The Environmental Statement has been prepared by competent experts in line with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. The EIA will be scrutinised by the Examining Authority and relevant statutory stakeholders through the pre-examination and examination phases of the DCO application, and consent will only be granted if the Secretary of State is satisfied that the likely effects of the

Parties	Issue	Summary of issue raised	Applicant's response
			Scheme have been adequately assessed, and that where possible, they have been avoided and mitigated for.
RR-0391, RR-0566, RR-0738, RR-0944, RR-1109	Assessment methodology	The Applicant has not responded to matters raised in the EIA in a way that stands up to scrutiny.	The Applicant respectfully disagrees with this comment and considers that the EIA has been produced to a level of detail to make an informed decision on the likely environmental effects which may result from the Scheme and the mitigation that is proposed as part of the Scheme.
RR-0009, RR-0021, RR-0648, RR-0774, RR-1136, RR-1167, RR-1206, RR-1230	Assessment methodology	Inadequacies in information about infrastructure such as the BESS compounds mean the EIA is not valid.	The Applicant considers that sufficient information about the infrastructure has been provided for this stage of the DCO process. Technology for renewable energy and battery storage is advancing rapidly, and as a result the Applicant cannot limit the potential of the Scheme design by making decisions at this stage on the precise technology to be included as part of the DCO application. The assessments within the EIA, as reported in the Environmental Statement, have been undertaken using the Rochdale Envelope approach. This is an accepted assessment approach when flexibility is required within a Scheme such as this, as outlined in the PINS Advice Note Nine: Rochdale Envelope. This approach means that the EIA has assessed the likely worst case parameters, within which the Scheme will be constructed. These parameters are secured via the DCO, which means that there is certainty over the environmental effects which will not exceed those in the ES. As such, the Applicant considers that the EIA is valid and has been undertaken to a level of detail which allows an informed decision on the potential environmental effects of the Scheme.
RR-0617, RR-0672, RR-1109	Assessment methodology	There is an incomplete account of all potential pollution and off-site emissions.	The Applicant considers that all likely potential pollution pathways and off-site emissions have been assessed to the appropriate level of detail. Chapter 6: Climate Change of the Environmental Statement [APP-038] details the assumption, methodology and results of a lifecycle greenhouse gas (GHG) assessment for the Scheme. The assessment has been undertaken in line with best practice GHG accounting principles of PAS2080 and in accordance with the IEMA guidance for assessing GHG emissions and evaluating their significance within EIA, which assesses the impact of GHG emissions arising over the lifetime of the Scheme on the climate. This assessment has therefore taken into account all off-site emissions during construction (including the supply chain to provide the

Parties	Issue	Summary of issue raised	Applicant's response
			materials required, transport of materials, and construction activities) and operation of the Scheme. The overall GHG impact over the lifetime of the Scheme is considered to have a Major Beneficial impact on Climate (see Chapter 5: EIA Methodology [APP-037] for a definition of the terminology used to describe residual effects). A complete account of other likely pollution sources and emissions is provided in the following chapters within the Environmental Statement: • Chapter 8: Ecology and Nature Conservation [APP-040]; • Chapter 9: Flood Risk, Drainage and Water Resources [APP-041]; • Chapter 11: Noise and Vibration [APP-043]; • Chapter 14: Air Quality [APP-046]; and • Chapter 16: Other Environmental Topics [APP-048].
RR-0021	Assessment methodology	The Applicant should be legally mandated to carry out independent assessments. Opponents should be granted access for their own assessments.	Environmental Impact Assessments have to be carried out pursuant to the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the "EIA Regulations") which require environmental statements to be prepared by 'competent experts'¹. The EIA has been undertaken by AECOM, an independent third-party consultancy commissioned by the Applicant – a statement of competence for each topic is set out in Appendix 1C to the Environmental Statement [APP-053]. AECOM is one of the largest infrastructure consulting firms in the world currently, advising on 60 DCO applications and who are Institute of Environmental Management & Assessment (IEMA) EIA accredited and a founding member of that accreditation. Therefore, AECOM have been appropriately appointed to carry out the assessment. The Applicant considers the assessment that has been carried out to be robust and accurate, and therefore does not consider further assessments to be necessary unless advised otherwise. Any decision to grant access to land within the Order

¹ Regulation 14(4) of the EIA Regulations.

Parties	Issue	Summary of issue raised	Applicant's response
			Limits for the purpose of carrying out such assessments is at the discretion of the respective landowner and is not something that is within the Applicant's control.
RR-0001, RR-0857, RR-1136, RR-1237, RR-1314	Assessment outcomes	The Applicant has underestimated the degree of environmental impact.	The Applicant respectfully disagrees with this statement. The EIA has been undertaken by a range of experienced specialists in their relevant disciplines. In all assessments detailed within the Environmental Statement [AAP-032-AAP259] , the specialists have assessed and reported on the likely worst-case scenario, in order to avoid underestimating the degree of environmental impact. It is considered that, in some cases, the environmental impact may be an overestimate at this stage compared to what will be finally developed, in order to ensure that this DCO application provides the most robust approach for the Examining Authority to make an informed decision.
RR-0936, RR-1314	Assessment scope	There is no adequate assessment of carbon impacts.	The Applicant has undertaken a lifecycle GHG impact assessment in line with best practice GHG accounting principles of PAS2080 and in accordance with the IEMA guidance for assessing GHG emissions and evaluating their significance within Environmental Impact Assessment, which assesses the impact of GHG emissions arising over the lifetime of the Scheme on the climate. This is presented in Chapter 6: Climate Change of the Environmental Statement [APP-038] . The overall GHG impact over the lifetime of the Scheme is considered to have a Major Beneficial impact on Climate (see Chapter 5: EIA Methodology [APP-037] for a definition of the terminology used to describe residual effects).
RR-0073, RR-0825, RR-1128, RR-1136, RR-1142	Assessment scope	There should be greater assessment of the cumulative impact of assessments.	The Applicant considers that the assessment of cumulative effects has been undertaken to a level of detail which allows an informed decision to be made on the potential significant cumulative effects. Cumulative assessments have been undertaken and reported within each of the technical chapters of the Environmental Statement [Chapters 6 to 16 [APP-0-38 to APP-048]]. These have been summarised in Chapter 17: Effect Interactions [APP-049] .
RR-1250	Assessment scope	Insufficient EIA scoping work has taken place.	The Applicant submitted an EIA Scoping Report [AAP-051] to the Planning Inspectorate on 13 March 2019. The Planning Inspectorate in consultation with statutory stakeholders provided its Scoping Opinion in writing on 23 April 2019 [AAP-052] . In this Scoping Opinion, the Planning Inspectorate reported on issues and proposed methodologies from the EIA Scoping Report that they agreed with, disagreed with, and recommended to be considered. These comments were

Parties	Issue	Summary of issue raised	Applicant's response
			considered and informed the development of the Preliminary Environmental Information Report in August 2020 and the Environmental Statement that accompanies this DCO application. As part of the Environmental Statement, the Applicant has had to show that it is based upon that Scoping Opinion. It is therefore considered that the EIA Scoping work was sufficient to inform the approach to the EIA.
RR-0239, RR-0593, RR-0797, RR-0827	Biodiversity	The biodiversity surveys are inadequate.	The Applicant respectfully disagrees. As set out in Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] , extensive surveys have been carried out between 2019 and 2021, with all surveys following appropriate industry standard guidance for survey of specific habitats or species, including spatial scale and duration, and are in line with those recommended by relevant statutory bodies, e.g., Natural England. The process for determining the appropriate scope of biodiversity surveys is set out in the Scoping Report [APP-051] and in accordance with the Scoping Opinion [APP-052] received from the relevant Statutory Natures Conservation Bodies (SNCBs), as detailed in the Consultation Report [APP-026] and summarised in Table 8-3 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] . The Applicant has, and continues to, engage with the SNCBs to ensure that the scope of biodiversity surveys are robust.
RR-0022	Ecology	The Beck sampling appears to have been done in June and September in limited places. It will not show up fish spawning.	Surveys undertaken were proportionate for assessing the potential impacts of the Scheme. There will be no loss of spawning places for fish, as no direct works to the watercourse will occur. Measures to avoid and minimise runoff into watercourses during construction and operation are outlined in the Framework Construction Environmental Management Plan [APP-123] and Framework Operational Environmental Management Plan [APP-124] .
RR-1177	Environmental information	The Combined Authority called for the scheme to be "exemplary in avoiding detrimental impacts". Without proper information on the scheme (with several aspects still left to subsequent obligations) this is not the case.	The Applicant considers that the mitigation hierarchy has been applied appropriately and thoroughly through the Scheme design and assessment. This has ensured that avoiding and minimising impacts has been prioritised, with any impacts that cannot be avoided sufficiently mitigated or compensated for. The Applicant considers that this Scheme will act as an exemplar for future solar and other renewable energy schemes due to the additional environmental benefits delivered through extensive areas of habitat creation.

Parties	Issue	Summary of issue raised	Applicant's response
			With regards to the aspects left to subsequent obligations, the draft DCO [APP-019] lists the requirements that the Applicant will be obligated to deliver either at the detailed design stage, prior to construction, or at the construction, operation or decommissioning phases, should the DCO be consented. These are matters of detail within the context of the parameters and environmental commitments that have been taken into account in the assessment undertaken. The Applicant considers that it has included all the relevant information required for the Examining Authority to make their decision for this DCO application.
RR-1142, RR-1239	Monitoring	Projects of this size should benefit from independent studies on the short- and long-term environmental impact.	The EIA has been undertaken by AECOM, an independent third-party consultancy commissioned by the Applicant – a statement of competence for each topic is set out in Appendix 1C to the Environmental Statement [APP-053]. The EIA will be scrutinised by the Examining Authority and relevant statutory stakeholders through the pre-examination and examination phases of the DCO application, and consent will only be granted if the Examining Authority is satisfied that the effects of the Scheme have been adequately assessed, avoided, and mitigated. In terms of temporal scope, the methodology for considering and assessing the short-term and long-term likely effects of the scheme on the environment is provided in Chapter 5: EIA Methodology of the Environmental Statement [APP-037] which is considered in the environmental specialist topic assessments.
RR-1142	OLEMP	The OLEMP should be produced early to inform the Inspector's decision.	An Outline Landscape and Ecology Management Plan (OLEMP) is included in the Application [APP-108] to inform the examination and guide the future development of the Scheme post DCO consent. This provides a framework for achieving the 'vision' of the Landscaping Masterplan, as illustrated on Figures 1 to 6, in Annex A of the OLEMP. It explains that " <i>detailed landscaping and ecological management plans will be approved by the relevant local planning authority and will be required to be in accordance with this OLEMP.</i> "
RR-0463	Photomontages	Verifiable photomontages should be prepared for all infrastructure of the development, including Burwell substation, not just the areas with solar panels.	Verifiable photomontages are included in Figure 10-90 [APP-220] to Figure 10-102 of the Environmental Statement [APP-232] to illustrate views from a selection of key viewpoints. This is in line with The Guidelines with Landscape and Visual Impact Assessment, 3 rd Edition, which states in paragraph 8.16 that " <i>it will not usually be possible to prepare visualisations for every viewpoint that has been identified and there will need to be discussions with the competent authority and consultation bodies to ensure that an appropriate number and range of viewpoints</i>

Parties	Issue	Summary of issue raised	Applicant's response
			<i>is used, allowing the significant visual effects to be illustrated at a range of representative locations covering the types of visual receptor."</i> The viewpoints identified for photomontages have been discussed with the host authorities during the pre-Application phase of the project. The photomontages illustrate the extent of solar panels and other features of the Scheme, including inverters, BESS and substations. In the case of the Burwell substation, only one visual receptor has been identified in the Landscape and Visual Impact Assessment (LVIA) in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] as likely to experience significant adverse effects during year 1 of operation (Viewpoint 53: View west from Weir's Drove). It was not considered proportionate to prepare photomontages to illustrate these effects, which will be mitigated and reduced to not significant by year 15 of operation.
RR-0155, RR-0599	Quantification of impacts	There needs to be quantification of the current positive environmental impact of the land to be developed and proper recognition of this value in the assessment of the Scheme.	The Environmental Impact Assessment predicts beneficial and adverse effects during construction, operation, and decommissioning of the Scheme, which are classified as minor, moderate, or major. The beneficial residual environmental effects are summarised in Chapter 18: Summary of Significant Environmental Effects of the Environmental Statement [APP-050] .
RR-1128	Socioeconomics	The assessment of the economic impact and socio-economic impact of the scheme is inadequate and fails to recognise the harm it would cause to the area as a whole.	The Applicant considers that the approach taken to the assessment of socio-economic effects presented in Chapter 12: Socio-economics and Land Use of the Environmental Statement [APP-042] is robust, as it is based on good practice guidance (HCA Additionality Guidance). The conclusions of the assessment are also considered to be sound both on this basis and previous experience. To maximise and expand the economic benefits of the Scheme for the local community an Outline Skills, Supply Chain and Employment Plan [APP-268] has been included in the Application.
RR-0873, RR-1128	Soil assessment	The assessment of soil quality does not appear to comply with British Soil Science or MAFF guidelines.	The Soils and Agriculture assessment has been undertaken by a British Society of Soil Science (BSSS) member. His professional experience in Agricultural Land Classification (ALC) dates back thirty years to being part of the MAFF ALC survey team. ALC survey work for the site complies with the guidance given by the MAFF ALC Guidelines (October 1988) and subsequently. Additional support on the appropriate application of the ALC system in England is given in Natural England

Parties	Issue	Summary of issue raised	Applicant's response
			publication TIN049 - Agricultural Land Classification: protecting the best and most versatile agricultural land.
RR-0808, RR-1101	Transport	No impact assessment of the damage to historic and domestic buildings by HGV journeys has been undertaken.	A Framework Construction Traffic Management Plan and Travel Plan [APP-118] has been prepared as part of the application. Construction traffic routes have been agreed with the local highway authority. This will be secured through the Construction Traffic Management Plan. HGV routes have been subject to swept path analysis to demonstrate that movements can be accommodated within the highway, and therefore damage to historic and domestic buildings is extremely unlikely. Internal haul routes will be kept well-maintained and free of imperfections that may cause perceptible levels of vibration to be generated.
RR-0441	Transport	The construction management plan references that Visibility splays are based on Design Manual for Roads and Bridges (DMRB) guidance for 60mph (100kph) roads showing a splay of 2.4m x 215m. From further reading of the DMRB it states that normally, an "X" distance of 4.5m shall be provided for a direct access where use in the design year is forecast not to exceed 500 AADT. The choice of set back distance is related to the forecast traffic using the access. For lightly used accesses, for example those serving a single dwelling or a small cul-de-sac of a half a dozen dwellings, the set back "X" may be reduced to 2.4m. The 2.4m set	The visibility splays were identified based on the carriageway speed limits and not the 85th percentile of vehicle speeds. The initial intention of the visibility splays was to identify the potential impact on the local vegetation and hedgerow if the full visibility splays were provided at the construction site accesses. Following this, a review of the visibility splays was undertaken with alternative temporary measures identified to provide safe entry and egress to/from the construction site accesses. This includes temporary traffic signals and temporary speed limit reductions which are identified in the Traffic Regulation Measures Plans – Temporary Road Closures [APP-009 to APP-011] and Traffic Regulation Measures Plans – Temporary Measures [APP-012 and APP-013]. Therefore, the initial visibility splays of 2.4m x 215m identified have been superseded. The appropriate inter-visibility of the temporary traffic signals will be provided. However, the 'X' distance of 2.4m was previously identified as appropriate given DMRB identifies for 'simple priority junctions' a distance of 9m or 2.4m is to be used. It was also considered appropriate given the temporary nature of the construction site accesses and also the infrequent use forecast of the majority of the construction site accesses given the forecast number of HGVs at each site access. It is also noted that in neither the DMRB document 'CD Geometric Design of at-grade priority and signal-controlled junctions' or 'CD 109 highway design'

Parties	Issue	Summary of issue raised	Applicant's response
		back relates to normally only one vehicle wishing to join the trunk road at one time. The 4.5m covers the situation where two light vehicles may want to accept the same gap in the trunk road traffic. Therefore, further clarification is required by the applicant.	documents are references made to 500 AADT in relation to the visibility at a T-Junction.
RR-0441	Transport	Transport Assessment states that no capacity assessments (junction modelling) has been undertaken.	The Transport Assessment [APP-117] and Chapter 13: Transport and Access of the Environmental Statement [APP-045] provides and justifies the methodology for assessment of the impact on driver delay through the absolute and percentage change in traffic flows, as well as comparison with peak period data to provide useful context and a reference point with regards to the capacity performance of the network. This is entirely appropriate and standard practice for an Environmental Statement, particularly considering the changes in traffic flows occur for a short-term, temporary time period during construction, outside of traffic network peaks. The forecast increase in vehicles and the comparison of the development peak hour traffic flows to the network peak hour traffic flows provide a reasonable indication on the expected level of delay. The increase of vehicles and associated delay are forecast during a short-term temporary period during the construction of the Scheme and relates to the peak forecast months.

3.8 Construction

3.8.1 292 individual comments were received in relation to the construction of the Scheme.

Applicant's responses to RRs relating to construction

Parties	Issue	Summary of issue raised	Applicant's response
RR-1142	CEMP	The CEMP is not sufficient.	The mitigation hierarchy has been applied throughout the design and assessment process. The Framework CEMP, included in Appendix 16C of the Environmental Statement [APP-123] details the measures to be adopted during construction to avoid and mitigate effects. This document will be updated prior to construction.
RR-0018, RR-0021, RR-0024, RR-0035, RR-0038, RR-0039, RR-0046, RR-0056, RR-0058, RR-0105, RR-0123, RR-0124, RR-0127, RR-0134, RR-0137, RR-0152, RR-0153, RR-0172, RR-0175, RR-0181, RR-0189, RR-0190, RR-0194, RR-0195, RR-0204, RR-0209, RR-0219, RR-0223, RR-0226, RR-0228, RR-0237, RR-0272, RR-0274,	Construction impacts	Construction activity will be disruptive for local residents.	Due to the scale of the Scheme, construction activity will present some disruption for a limited period to local residents. The construction phase has been assessed for all environmental topics within the Environmental Impact Assessment (Chapters 6 to 16 of the Environmental Statement [APP-038 to APP-048]), and a summary of environmental impacts for construction, operation and decommissioning is provided in Chapter 18: Summary of Environmental Effects [APP-050]. No likely significant effects are identified during construction in relation to noise and air quality. The mitigation hierarchy has been applied throughout the design and assessment process. The Framework CEMP, included in Appendix 16C of the Environmental Statement [APP-123] and which will be secured via the DCO, details the measures to be adopted during construction to avoid and mitigate effects. This document will be updated prior to construction pursuant to the DCO.

Parties	Issue	Summary of issue raised	Applicant's response
RR-0275, RR-0305, RR-0330, RR-0334, RR-0393, RR-0409, RR-0440, RR-0444, RR-0452, RR-0460, RR-0465, RR-0483, RR-0486, RR-0488, RR-0498, RR-0500, RR-0502, RR-0514, RR-0578, RR-0584, RR-0586, RR-0588, RR-0615, RR-0624, RR-0627, RR-0628, RR-0635, RR-0640, RR-0641, RR-0658, RR-0663, RR-0669, RR-0673, RR-0674, RR-0675, RR-0681, RR-0683, RR-0684, RR-0687, RR-0689, RR-0700, RR-0701, RR-0708, RR-0712, RR-0714, RR-0720, RR-0737, RR-0750, RR-0751, RR-0756, RR-0758,			

Parties	Issue	Summary of issue raised	Applicant's response
RR-0769, RR-0773, RR-0797, RR-0825, RR-0829, RR-0844, RR-0855, RR-0867, RR-0891, RR-0889, RR-0914, RR-0925, RR-0926, RR-0943, RR-0969, RR-0977, RR-0980, RR-0988, RR-0990, RR-0999, RR-1025, RR-1027, RR-1052, RR-1072, RR-1090, RR-1101, RR-1114, RR-1119, RR-1125, RR-1128, RR-1130, RR-1131, RR-1144, RR-1182, RR-1186, RR-1209, RR-1211, RR-1212, RR-1221, RR-1240, RR-1241, RR-1244, RR-1246, RR-1256, RR-1269, RR-1273, RR-1282, RR-1283, RR-1286, RR-1308, RR-			

Parties	Issue	Summary of issue raised	Applicant's response
1319, RR-1329, RR-1336			
RR-0297, RR-0303, RR-0307, RR-0338, RR-0380, RR-0432, RR-0444, RR-0495, RR-0640, RR-0734, RR-0748, RR-0884, RR-1148, RR-1152, RR-1166, RR-1297, RR-1337	Construction impacts	There will be a negative impact from miles of security fencing erected during construction and operations.	Temporary fencing during construction is required to secure the parcels within the DCO Site, to protect the workforce and the public while the Scheme is built out. It will therefore not be continuous and will largely be set within the existing field pattern, behind existing features such as hedgerows and pine lines. As set out in the Framework Construction Environmental Management Plan [APP-123], this fencing is also required to mitigate potential impacts relating to the protection of existing vegetation including trees to be retained and ecology, by incorporating gaps to allow mammals to pass underneath at strategic locations. The implementation of the security fencing has been considered within Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] when it is erected as part of the construction phase assessment. The fencing will be a wire mesh on timber posts, which are similar materials to agricultural fencing within the study area. The porosity of the wire mesh of the proposed fencing means that there would be views through to other elements of the Scheme within its existing landscape framework and setting. This will minimise adverse landscape and visual impacts of the fencing.
RR-0208, RR-0601, RR-0870	Construction impacts	Disruption from construction will negatively affect small local businesses.	As set out in Chapter 12: Socio-economics and Land Use [APP-044] of the Environmental Statement, the Scheme will create short-term employment during the construction phase, which in turn will have beneficial impacts for the local economy, including through expenditure at local businesses. Mitigation measures set out in the Framework CEMP [APP-123] and the Framework CTMP [APP-118] will be put in place to minimise disruption from construction activities.
RR-0009, RR-0024, RR-0044, RR-0117, RR-0384, RR-0395, RR-0444, RR-0659, RR-0698, RR-0852, RR-	Construction impacts	New light sources will create light pollution.	Details on the management of light sources during construction to avoid and mitigate effects on the local community and wildlife are provided within Appendix 16C Framework CEMP of the Environmental Statement [APP-123], secured pursuant to a DCO Requirement. Temporary construction site lighting will be required in areas where natural lighting is not available, and during core working hours within winter months. Artificial lighting will be provided to maintain sufficient security and health and

Parties	Issue	Summary of issue raised	Applicant's response
1070, RR-1093, RR-1326			safety for the construction site, whilst adopting mitigation principles to avoid excessive glare, and minimise spill of light to nearby receptors (including ecology and residents), outside of the Order Limits as far as reasonably practicable. All construction lighting will be deployed in accordance with the following recommendations to prevent or reduce the impact on human and ecological receptors: a. The use of lighting will be minimised to that required for safe site operations; b. Lighting will utilise directional fittings to minimise outward light spill and glare (e.g. via the use of light hoods/cowls which direct light below the horizontal plane, preferably at an angle greater than 20° from horizontal); and c. Lighting will be directed towards the middle of the construction site rather than towards the boundaries. Further controls on construction lighting to avoid and mitigate effects on bats in the area will be implemented once the pre-commencement ecology surveys have been undertaken prior to construction. These measures will be included within the detailed CEMP. The Environmental Statement does not identify any significant effects arising as a result of construction lighting.
RR-0473, RR-0594, RR-1272	Construction impacts	Cable installation will be disruptive due to road crossings.	Management and mitigation during the construction period is outlined in the Framework Construction Traffic Management Plan and Travel Plan [APP-118] and the Traffic Regulation Measures Plans – Temporary Road Closures [APP-009 to APP-0011]. The road closures are expected to last no more than one week, which is considered a worst-case scenario. Advanced warning of any road closures will be made with appropriate diversions signposted.
RR-0166, RR-0228, RR-0596, RR-0775, RR-0823, RR-1102, RR-1192	Construction impacts	There will be a loss of access to footpaths and bridleways during construction.	There are eight PRoWs which are required to be temporarily closed during the construction period. The Scheme has been designed to minimise the number of PRoW closures and the length of time required for each closure. The PRoWs are not expected to be closed all at the same time. The PRoWs are expected to be closed for no more than three weeks which is considered the worst-case scenario.

Parties	Issue	Summary of issue raised	Applicant's response
RR-0294, RR-0300, RR-0808, RR-0895, RR-1101	Construction impacts	Construction traffic will damage older local properties including listed buildings.	The Applicant respectively disagrees. The effect of construction traffic on historic properties has been considered within Chapter 7: Cultural Heritage of the Environmental Statement [APP-039]. This takes into account temporary impacts associated with visual intrusion and noise and concludes no impact. A Framework Construction Traffic Management Plan and Travel Plan [APP-118] has been prepared as part of the application. This includes measures to control construction traffic in proximity to listed buildings.
AS-013	Construction impacts	Construction could disrupt the operations of the East of England Ambulance Service. Appropriate procedures need to be put in place for emergency access. The Applicant should put in place policies and training to ensure patients arising from emergencies on site get to a place of 'normal access' and handover to ambulance crews.	Management and mitigation during the construction period is outlined in the Framework Construction Traffic Management Plan and Travel Plan [APP-118] and the Traffic Regulation Measures Plans – Temporary Road Closures [APP-009 to APP-011] and Traffic Regulation Measures Plans – Temporary Measures [APP-012 to APP-013] for temporary traffic signals. The road closures are expected to last no more than one week and is considered a worst-case scenario. Advanced warning of any road closures will be made with appropriate diversions signposted. There are various site accesses across the scheme where emergency vehicles can gain access if required. The site accesses required during the construction phase are outlined in the Transport Assessment [APP-117]. The framework Construction Traffic Management Plan and Travel Plan [APP-118] will be developed further by the contractor as the Scheme progresses. The access routes provide a number of potential access points for emergency vehicles on to Sites, with two accesses being provided for all three BESS locations. The need for management and training in terms of response to emergencies will be covered under the Health and Safety procedures developed for the Scheme and do not form part of the EIA at this stage.
AS-013	Construction impacts	Further information is required about the nature of the construction workforce to appropriately assess its direct impacts on the East of England Ambulance Service. Appropriate	The Applicant considers that appropriate detail on the construction activities and programme have been provided at this stage of the process. A Framework CEMP (Appendix 16C of the Environmental Statement [APP-123]) has been submitted with the DCO Application. All mitigation measures included within this document would be secured as part of the DCO consent.

Parties	Issue	Summary of issue raised	Applicant's response
		mitigation measures should be secured as part of the DCO.	The Applicant does not consider any additional mitigation measures are required. It is seeking to engage with the East of England Ambulance Service to understand its position more fully and will report back to the examination in due course.
RR-0526, RR-0775	Construction impacts	The closure of the U6006 will disrupt wildlife including bats and damage buried archaeology.	The U6006 will be closed temporarily for up to seven days during construction. It will not be closed permanently and will remain open during operation. No significant effects on wildlife or buried archaeology are anticipated as a result of the temporary closure.
RR-0102, RR-0189, RR-0209, RR-0614, RR-0775, RR-0901, RR-1142	Construction impacts	Construction will have negative ecological impacts.	With reference to Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040], protected species identified as part of the detailed baseline surveys are reported in Tables 8-7 and 8-8, with an assessment of potential construction related impacts undertaken in section 8.9. Where required, the Scheme has delivered appropriate mitigation. Paragraphs 8.817-8.8.23 and 8.8.28 set out avoidance and mitigation measures for protected and notable species. No significant effects to ecological receptors are predicted in the Environmental Statement. A Framework Construction Environmental Management Plan [APP-123] has been produced and submitted as part of the DCO application. This details mitigation measures that would be adopted to minimise ecological impacts during construction. A full Construction Environmental Management Plan will be produced during detailed design and prior to construction.
RR-0208, RR-0601	Construction impacts	Construction should not impact negatively on the enjoyment of the Royal Worlington and Newmarket Golf Club.	It is not anticipated that the Scheme will negatively impact the Royal Worlington and Newmarket Golf Club. Existing vegetation would screen the golf course from the construction activities within Sunnica East Site B, which is adjacent to the golf course. In addition, following the feedback received during statutory consultation, the Applicant has removed the construction site access from Golf Links Road which removes the requirement for HGVs to travel along Golf Links Road during the construction period. It is therefore not anticipated that the construction phase of the Scheme would impact negatively on the enjoyment of the Royal Worlington and Newmarket Golf Club.

Parties	Issue	Summary of issue raised	Applicant's response
RR-1131, RR-1172, RR-1262, RR-1263, RR-1275	Construction methods	Cable installation should not disrupt farming activities where the cable crosses arable fields.	During construction, the cable route will be laid using open-cut trenching methods across arable fields (except in the locations identified for non-intrusive cable installation methods, identified in Chapter 3: Scheme Description of the Environmental Statement [APP-035]). Although care will be taken to ensure minimal disruption to farming activities through programme planning, it is likely that there will be some temporary disruption required to farming activities while the machinery is present in each field. These disruptions will be minimised through the adoption of measures detailed in the CEMP, which will be based on the Framework CEMP provided in Appendix 16C of the Environmental Statement [APP-123] .
RR-1262, RR-1263, RR-1275	Construction methods	Cables should be laid to a depth of 1200mm.	A number of the design aspects and features of the Sunnica Energy Farm cannot be confirmed until the tendering process for the design and construction of the Sunnica Energy Farm has been completed. Should consent be granted, the Applicant will build within the controlled parameters set out in the DCO. An updated Scheme description has been submitted as part of the Applicant's DCO application. This is available in Chapter 3: Scheme description of the Environmental Statement [APP-035] , which sets a maximum parameter of 2000mm as the depth for laying cables, which is secured by its inclusion in the Design Principles [APP-264] , compliance with which is a DCO Requirement.
RR-1170	Construction methods	Further detail is required of cabling around Breach Cottage.	The cable will be routed on the other side of the road from Breach Cottage. It will be installed in a trench approximately 1.2m deep, a minimum of 10m from the cottage. It could be installed as far as 60m away within the proposed cable route corridor. It would be preferable for it to be laid adjacent to the road. However, it could be laid anywhere within the cable corridor which extends to a distance approximately 60m from the cottage. In this case, it would be laid in agricultural land. While it is possible to plant arable crops over the cable, cables are normally routed on field boundaries to minimise any possibility of farming operations exposing the cables. The cable will be laid in trefoil in this section of the route which effectively mitigates any electromagnetic effects.
RR-0535	Construction timescales	Further information is required about construction timescales.	Chapter 3: Scheme description of the Environmental Statement [APP-035] includes information about construction timescales at 3.6.2. A construction programme of approximately 24 months will be achieved if the Scheme was built

Parties	Issue	Summary of issue raised	Applicant's response
			in one continuous phase. This has been assessed within the ES, as it is considered to be a worst case in terms environmental effects.
RR-0137, RR-1257	Cumulative impacts	Disruption from construction is already an issue in Burwell.	The construction phase has been assessed for all environmental topics within the Environmental Impact Assessment (Chapters 6 to 16 of the Environmental Statement [APP-038 to APP-048], and a summary of environmental impacts for construction, operation and decommissioning is provided in Chapter 18: Summary of Environmental Effects of the Environmental Statement [APP-050]. As a result of the proposed changes to the Scheme, the Burwell National Grid Substation Extension – Option 1 will be removed from the Scheme. Therefore, the only works required in the vicinity of Burwell are the works within the existing Burwell National Grid Substation to facilitate the connection of the Scheme to the transmission network, Grid Connection Route B and potentially Burwell National Grid Extension – Option 2; should this option be taken forward. No significant effects associated with any of these works have been identified within the technical assessments of the Environmental Impact Assessment (Chapters 6 to 16 of the Environmental Statement [APP-038 to APP-048]) in the vicinity of Burwell. In addition, a Framework CEMP [APP-123] and a Framework CTMP and Travel Plan [APP-118], have been included in Appendix 16C and Appendix 13C of the Environmental Statement, respectively. These documents provide details of the measures to be adopted during construction to avoid and mitigate effects, and will be updated prior to construction.
RR-0035, RR-0322, RR-0334, RR-0444, RR-0550, RR-0681, RR-0709, RR-0772, RR-0808, RR-0854, RR-0893, RR-0944, RR-1008, RR-1025, RR-1048,	Dust	Concern about the generation of dust during construction.	A full dust risk assessment has been undertaken, in accordance with guidance from the Institute of Air Quality Management. Providing the recommended mitigation measures are implemented (secured in the DCO by the Construction Environmental Management Plan [APP-123]) the impact of dust from the site will not be significant.

Parties	Issue	Summary of issue raised	Applicant's response
RR-1130, RR-1301			
AS-013	Emergency services	The processes and procedures developed by Sunnica Ltd and any of its outsourced construction organisations should refer legislation and technical guidance which puts a duty on Sunnica Ltd to have its own response and medical mitigation to get the patient to a place of 'normal access' and handover to EEAST crews.	Noted. The Principal Contractor appointed by the Applicant will be required under The Construction (Design and Management) Regulations (2015) to manage all health and safety aspects of the Scheme. As part of this, the Principal Contractor will have a duty under Clause 30 Emergency Procedures, to provide ' <i>...suitable and sufficient arrangements for dealing with any foreseeable emergency must be made and, where necessary, implemented, and those arrangements must include procedures for any necessary evacuation of the site or any part of it.</i> '
AS-013	Emergency services	Plans and contingencies for facilitating emergency access, on-site triage, medical assessment, patient identification, stabilisation, clinical information, safe and efficient handover to EEAST responders and sustaining operationally optimal attendance times which in urgent cases may require Helicopter Emergency Medical Services access, is considered to be necessary.	Noted. The Principal Contractor appointed by the Applicant will be required under The Construction (Design and Management) Regulations (2015) to manage all health and safety aspects of the Scheme. As part of this, the Principal Contractor will have a duty under Clause 31 Emergency Routes and Exits to provide, ' <i>a sufficient number of suitable emergency routes and exits must be provided to enable any person to reach a place of safety quickly in the event of danger</i> '. As part of the Application, accesses have been identified across the Site, which provide alternative options for access and egress in emergency situations, refer to the Framework Construction Traffic Management Plan and Travel Plan [APP-118] for access locations.
AS-013	Emergency services	EEAST would expect any trench collapse to fall under the confined spaces regulations and that Sunnica Ltd, construction company and/or contractor should have access to a confined space trained team that could extricate a casualty safely.	Noted. The Principal Contractor appointed by the Applicant will be required under The Construction (Design and Management) Regulations (2015) to manage all health and safety aspects of the Scheme. As part of this, the Principal Contractor will have a duty under Clause 22 Excavations to ensure ' <i>All practicable steps must be taken to prevent danger to any person...</i> '. In addition, the Principal Contractor will abide by The Confined Spaces Regulations (1997).

Parties	Issue	Summary of issue raised	Applicant's response
RR-0183, RR-0295, RR-0305, RR-0444, RR-0545, RR-0610, RR-0856, RR-0884, RR-0896, RR-1337	Employment	The Scheme uses minimal UK businesses in its construction.	Where possible, the Applicant will seek to make use of local staff and suppliers during operations. Further information is provided within the Outline Skills, Supply Chain and Employment Plan [APP-268] .
RR-0573, RR-0825, RR-0870	Impact on horses	Construction noise will be detrimental to horse racing and training facilities.	Horses tend to be startled by short high noise events, which may occur as a result of construction activities. Consultation will be undertaken with equestrian groups on the timings and duration of construction activities. A point of contact will be available with the Contractor to liaise with the horse racing and training community and other neighbours.
RR-0319	Investment	The capital cost of construction is relatively small compared to the amount of energy generated.	This comment is noted. Chapter 9 of the Statement of Need [APP-260] describes how solar is already the cheapest existing form of electricity generation in the UK, and Figure 9-2 shows how solar efficiency has increased over the last 20 years of its development. Figure 9-5 within the Statement of Need [APP-260] shows that solar is expected to become even cheaper on a lifetime unit cost of generation basis and maintain its position as the cheapest form of electricity generation in the UK over the coming decades. Lifetime unit cost of generation takes into account capital and operating costs and is described in Section 9.2 of the Statement of Need [APP-260] .
RR-0990, RR-0992, RR-1027	Investment	Concern about the cost of the installation and maintenance of the PV panels.	Chapter 9 of the Statement of Need [APP-260] describes how solar is already the cheapest existing form of electricity generation in the UK. Figure 9-2 shows how solar efficiency has increased over the last 20 years of its development. Figure 9-5 within the Statement of Need [APP-260] shows that solar is expected to become even cheaper on a lifetime unit cost of generation basis and maintain its position as the cheapest form of electricity generation in the UK over the coming decades. Lifetime unit cost of generation takes into account capital and operating costs and is described in Section 9.2 of the Statement of Need [APP-260] .

Parties	Issue	Summary of issue raised	Applicant's response
RR-0252	Management	No impact assessment has been made as to how Sunnica propose to store in excess of 320K litres of fuel on site during the construction phases and the prevention of environmental spillage and subsequent soil contamination, together with details for workforce vehicle parking and access to site.	The Applicant respectfully disagrees. The management of construction activities would be controlled through the implementation of the CEMP, which will be developed prior to construction, and substantially based on the Framework CEMP [APP-123] submitted with the Application. The measures identified within the Framework CEMP are considered as embedded mitigation and therefore taken into account when undertaking the assessments as part of the EIA. Potential for ground and water contamination is documented within Chapter 16: Other Environmental Topics [APP-048], Appendix 16B: Phase 1 – Preliminary Environmental Risk Assessment [APP-122], Chapter 9: Flood Risk, Drainage and Water Resource [APP-041]. The mitigation measures are documented in Table 3-4 and Table 3-10 of the Framework CEMP [APP-123] and include measures such as requirements to store oils and hydrocarbons, providing adequate bunding, provision of spill kits, drafting pollution response plans, preparing emergency spillage plans to name a few. In terms of details for workforce vehicle parking and access to site, this is outlined in Chapter 13: Transport and Access of the Environmental Statement [APP-045] as well as the Transport Assessment [APP-117]. A staff car parking strategy has been developed with two car parks located in close proximity to the A11 to encourage staff to use the A11 and A14 for as much as their journey to and from the site as practically possible. In addition, mini-buses will be used to transport staff around the site using internal routes where possible.
RR-0161	Management	Who will be responsible for managing construction?	The appointed principal contractor will be responsible for working in accordance with the environmental controls documented in the Framework CEMP [APP-123], pursuant to the DCO. The overall responsibility for implementation of the CEMP(s) will lie with the appointed principal contractor as a contractual responsibility to the Applicant, as the Applicant is ultimately responsible for compliance with the Requirements of the DCO.
RR-0573	Management	Within the Construction Environmental and Management Plan (CEMP) it has been stated that "Noisy works will not be undertaken until after 10:00 hours	In order to minimise the effects from construction on horse training facilities, particularly the Snailwell Gallops, construction work will start no earlier than 10:00am in W03, EC05 and W04, in order to avoid the peak training times at the gallops. This has been incorporated into the Framework Construction Environmental Management Plan [APP-123]. Should the Applicant receive

Parties	Issue	Summary of issue raised	Applicant's response
		in the Work Areas close to Snailwell Gallops in Sunnica West Site A, specifically W03, W04 and EC05". It is vital that this is complied with in order to protect the safety of the riders and horses when training along this part of the Gallops.	development consent, construction of the Scheme would need to be in accordance with the final Construction Environmental Management Plan agreed with the local authorities.
RR-0024, RR-0132, RR-0137, RR-0167, RR-0173, RR-0186, RR-0194, RR-0195, RR-0209, RR-0243, RR-0288, RR-0322, RR-0343, RR-0344, RR-0351, RR-0354, RR-0357, RR-0376, RR-0384, RR-0440, RR-0444, RR-0459, RR-0483, RR-0486, RR-0498, RR-0519, RR-0524, RR-0550, RR-0578, RR-0633, RR-0640, RR-0675, RR-0681, RR-0684, RR-0692, RR-0700, RR-0737, RR-0738, RR-0739,	Noise	Noise from construction will be unbearable.	The results of the construction noise assessment in Table 11-18 of Chapter 11: Noise and Vibration of the Environmental Statement [APP-043] indicate that noise effects will not be significant at nearby receptors. Mitigation measures to ensure that construction noise emissions are reduced as far as reasonably practicable are detailed in the Framework Construction Environmental Management Plan [APP-123] .

Parties	Issue	Summary of issue raised	Applicant's response
RR-0748, RR-0764, RR-0781, RR-0793, RR-0799, RR-0825, RR-0842, RR-0855, RR-0861, RR-0893, RR-0906, RR-0923, RR-0944, RR-0980, RR-1071, RR-1113, RR-1131, RR-1144, RR-1164, RR-1169, RR-1184, RR-1186, RR-1189, RR-1190, RR-1209, RR-1235, RR-1240, RR-1256, RR-1277, RR-1301			
RR-0855, RR-1108	Timescale	The construction phase is too long.	The current expectation is that site preparation, construction, and commissioning of the Scheme will take approximately 24 months which the Applicant considers to be appropriate. However, there is the possibility that the construction will be phased, and the overall period could therefore be longer. The Applicant has assessed the potential impacts of the Scheme relating to construction and is proposing mitigation in the Framework Construction Environmental Management Plan (CEMP), Appendix 16C of the Environmental Statement [APP-123]. This will be updated subject to the Applicant receiving development consent, and prior to the start of construction, to account for the Scheme's final design.
RR-0463	Timescale	Construction must be 9am-5pm.	The Applicant does not consider this proposed shift pattern to be appropriate as it would require that construction traffic flows coincide with existing network peaks. This is likely to lead to a greater transport impact than that assessed with the

Parties	Issue	Summary of issue raised	Applicant's response
			Applicant's proposed working hours of 07:00 to 19:00 Monday to Saturday. Further information can be found in the Framework Construction Traffic Management and Travel Plan [APP-118] .
RR-0012, RR-0032, RR-0082, RR-0124, RR-0145, RR-0159, RR-0228, RR-0507, RR-0510, RR-0542, RR-0548, RR-0550, RR-0584, RR-0586, RR-0587, RR-0588, RR-0604, RR-0672, RR-0792, RR-0886, RR-0889, RR-0891, RR-0983, RR-0901, RR-0907, RR-0912, RR-0972, RR-1109, RR-1112, RR-1143, RR-1238, RR-1284	Traffic	The local road network will not be able to support construction traffic.	The impact on the local highway network is outlined in Chapter 13: Transport and Access of the Environmental Statement [APP-045] as well as the Transport Assessment [APP-117] . A staff car parking strategy has been developed with two car parks located in close proximity to the A11 to encourage staff to use the A11 and A14 for as much as their journey to and from the Scheme as practically possible. In addition, mini-buses will be used to transport staff around the site using internal routes where possible. This will limit the number of construction staff vehicle trips on the local highway network. The Transport Assessment [APP-117] also provides the peak and average daily HGVs on the local highway network required to access each of the Sunnica East Site A and B and Sunnica West Site A and B site accesses. The assessment has determined that the local road network has sufficient capacity to accommodate the proposed construction traffic. However, it is noted that there may be some disruption and therefore the Framework Construction Traffic Management Plan and Travel Plan [APP-118] and the Traffic Regulation Measures Plans - Temporary Measures [APP-012 and APP-013] identify mitigation to provide safe entry and egress to the Scheme.
RR-0012, RR-0166, RR-0181, RR-0243, RR-0259, RR-0288, RR-0296, RR-0297, RR-0303, RR-0424, RR-	Traffic	The presence of HGVs on small local roads represents a danger to life.	The impact on the local highway network is outlined in Chapter 13: Transport and Access of the Environmental Statement [APP-045] as well as the Transport Assessment [APP-117] . This has included in depth assessment of the impacts of HGVs traffic, and the impact on non-motorised users. Thus, both facets of this statement have been assessed. Personal Injury Collision (PIC) data on the surrounding highway network was obtained from SCC and CCC for the most recent five years (60 months) available at the time of writing between January

Parties	Issue	Summary of issue raised	Applicant's response
0440, RR-0456, RR-0514, RR-0548, RR-0550, RR-0552, RR-0587, RR-0596, RR-0610, RR-0617, RR-0623, RR-0633, RR-0668, RR-0671, RR-0681, RR-0686, RR-0706, RR-0717, RR-0721, RR-0725, RR-0726, RR-0733, RR-0736, RR-0739, RR-0758, RR-0759, RR-0764, RR-0775, RR-0801, RR-0808, RR-0809, RR-0818, RR-0825, RR-0835, RR-0881, RR-0889, RR-0912, RR-1035, RR-1088, RR-1101, RR-1115, RR-1125, RR-1131, RR-1141, RR-1164, RR-1190, RR-1222, RR-1301			2014 and August 2019. As a result of the coronavirus pandemic and the impact on the reduced traffic flows during national and regional lockdowns, the PIC data has remained consistent with the analysis undertaken for the PEI Report pre-2020. Since the PIC data was obtained, further information regarding the extension of the Burwell National Grid Substation Extension and Grid Connection Route A and B has become available. Therefore, further investigation on Crash Map had been undertaken on the roads outside of the previous study area from Exning to the Burwell National Grid Substation Extension along Newmarket Road, Reach Road and Weirs Drove. Based on this data and an assessment of the Scheme proposals, the Environmental Statement has identified that there will not be a significant impact in terms of highways safety. To provide safe entry and egress to and from the construction site accesses, a range of temporary measures have been identified in the Traffic Regulation Measures Plans – Temporary Road Closures [APP-009 to APP-011] and Traffic Regulation Measures Plans – Temporary Measures [APP-012 to APP-013]. In addition, it was agreed pre-application with the local highway authority to escorting HGVs associated with the development via a convoy marshal through the Newmarket Road/B1102 junction in Worlington. Reference to this agreement is made within Chapter 13: Transport and Access of the Environmental Statement [APP-045] in Table 13-3 'Main Matters Raised during further Consultation'. Furthermore, road widening is proposed on La Hogue Road and Elms Road to enhance the ability for cars to pass HGVs and HGVs to pass one another on these sections.
RR-0746	Traffic	The CTMP is misleading and unrealistic.	The Applicant respectfully disagrees. It is unclear which elements of the Framework Construction Traffic Management Plan and Travel Plan [APP-118] is

Parties	Issue	Summary of issue raised	Applicant's response
			considered misleading and unrealistic. The document has been prepared as a framework document to set out how the Applicant proposes to manage construction traffic and staff vehicles during the construction period. This document will be updated prior to construction by the contractor and approved by the local highways authority.
RR-0096, RR-0208, RR-0252, RR-0261, RR-0291, RR-0356, RR-0859	Traffic	The use of Golf Links Road during construction would be inappropriate.	Following the consultation feedback, the Applicant has removed the construction site access from Golf Links Road which removes the requirement for HGVs to travel along Golf Links Road during the construction period.

3.9 Operations

3.9.1 827 individual comments were received in relation to the operation of the Scheme.

Applicant's responses to RRs relating to operation

Parties	Issue	Summary of issue raised	Applicant's response
RR-0001, RR-0002, RR-0003, RR-0004, RR-0005, RR-0007, RR-0012, RR-0017, RR-0018, RR-0019, RR-0024, RR-0025, RR-0027, RR-0036, RR-0037, RR-0039, RR-0042, RR-0043, RR-0044, RR-0050, RR-0052, RR-0053, RR-0055, RR-0056, RR-0057, RR-0059, RR-0062, RR-0064, RR-0065, RR-0067, RR-0068, RR-0069, RR-0071, RR-0074, RR-0076, RR-0077, RR-0078, RR-0079, RR-0080, RR-0082, RR-	BESS	The BESS is unsafe due to the risk of fire and associated toxic fumes and ground contamination.	The risk of fire is minimal and has been reduced to as low as is reasonably practicable due to the fire suppression system that will be installed and passive fire safety measures. The safety measures proposed for the BESS have been outlined in the Outline Battery Fire Safety Management Plan [APP-267]. The measures outlined in this document have been agreed with the Suffolk Fire and Rescue Services. In recognition of the amount of concerns raised by the Relevant Representations, the Applicant decided to commission a peer review of the Outline Battery Fire Safety Management Plan and the Unplanned Atmospheric Emissions from Battery Energy Storage Systems (BESS) document. Any updates to the documents as a result of that peer review will be submitted at Deadline 2 of the Examination. The potential for emissions of toxic fumes from a BESS fire has been assessed in Appendix 16D of the Environmental Statement [APP-124]. This study reviews the potential emissions to air from out-gassing and from fire. It also considers the potential magnitude of emissions and the likely consequences of emissions to air from BESS. This assessment has concluded that, should all the systems fail and a large-scale fire break out within one of the BESS containers, then the resultant hydrogen fluoride concentration at the closest receptors would be below the level that Public Health England has identified as resulting in notable discomfort to members of the general population. The expected hydrogen fluoride emissions will be checked against the assumptions in Appendix 16D of this Environmental Statement [APP-124] at detailed design stage (post-consent) once the make, model and layout of the BESS is known, and, if necessary, consequence modelling will be undertaken to demonstrate the impacts associated with an unplanned fire would not exceed the

Parties	Issue	Summary of issue raised	Applicant's response
0085, RR-0087, RR-0089, RR-0092, RR-0097, RR-0098, RR-0100, RR-0102, RR-0103, RR-0105, RR-0108, RR-0109, RR-0111, RR-0117, RR-0119, RR-0122, RR-0123, RR-0126, RR-0130, RR-0132, RR-0134, RR-0136, RR-0137, RR-0138, RR-0139, RR-0140, RR-0141, RR-0142, RR-0146, RR-0148, RR-0150, RR-0154, RR-0156, RR-0157, RR-0158, RR-0159, RR-0162, RR-0164, RR-0166, RR-0170, RR-0171, RR-0175, RR-0176, RR-0184, RR-0187, RR-0189, RR-0193, RR-0194, RR-0195, RR-0197, RR-0199, RR-			effects outlined in this report or cause any significant adverse health effects to the local community. This is secured through the design principles in requirement 6 of the DCO. This would also be able to be provided as part of the battery fire safety management plan to be approved by the local planning authorities following consultation with the Fire Services, as secured by DCO Requirement 7 [APP-019]. The environmental impacts associated with ground contamination and water course pollution have been considered within the Chapter 9: Flood Risk, Drainage and Water Resources and Chapter 16: Other Environmental Topics of the Environmental Statement [APP-041] [APP-048]. To reduce the potential for contamination in the unlikely event that a BESS fire occurs, impermeable surfacing and bunds have been included in the BESS design to hold fire water run-off and to prevent the water from leaching into the groundwater or migrating to surface water bodies nearby.

Parties	Issue	Summary of issue raised	Applicant's response
0206, RR-0209, RR-0210, RR-0215, RR-0216, RR-0218, RR-0219, RR-0220, RR-0221, RR-0222, RR-0226, RR-0233, RR-0224, RR-0225, RR-0227, RR-0228, RR-0229, RR-0235, RR-0238, RR-0241, RR-0243, RR-0246, RR-0247, RR-0251, RR-0252, RR-0254, RR-0255, RR-0256, RR-0258, RR-0260, RR-0262, RR-0264, RR-0265, RR-0268, RR-0272, RR-0274, RR-0275, RR-0285, RR-0286, RR-0288, RR-0289, RR-0290, RR-0291, RR-0292, RR-0295, RR-0297, RR-0301, RR-0303, RR-0304, RR-0305, RR-0306, RR-			

Parties	Issue	Summary of issue raised	Applicant's response
0307, RR-0309, RR-0313, RR-0315, RR-0320, RR-0321, RR-0322, RR-0324, RR-0327, RR-0328, RR-0334, RR-0335, RR-0341, RR-0345, RR-0362, RR-0368, RR-0370, RR-0372, RR-0374, RR-0376, RR-0378, RR-0382, RR-0385, RR-0387, RR-0393, RR-0398, RR-0401, RR-0404, RR-0405, RR-0407, RR-0408, RR-0409, RR-0412, RR-0413, RR-0414, RR-0416, RR-0417, RR-0418, RR-0423, RR-0424, RR-0426, RR-0428, RR-0429, RR-0430, RR-0432, RR-0433, RR-0434, RR-0437, RR-0439, RR-0442, RR-0443, RR-			

Parties	Issue	Summary of issue raised	Applicant's response
0444, RR-0445, RR-0446, RR- 0449, RR-0452, RR-0453, RR- 0456, RR-0457, RR-0459, RR- 0460, RR-0464, RR-0465, RR- 0467, RR-0468, RR-0470, RR- 0472, RR-0475, RR-0477, RR- 0478, RR-0480, RR-0481, RR- 0482, RR-0483, RR-0484, RR- 0485, RR-0486, RR-0488, RR- 0490, RR-0491, RR-0492, RR- 0494, RR-0496, RR-0498, RR- 0505, RR-0507, RR-0509, RR- 0510, RR-0511, RR-0513, RR- 0515, RR-0516, RR-0518, RR- 0519, RR-0520, RR-0521, RR- 0523, RR-0524, RR-0525, RR- 0527, RR-0528, RR-0529, RR-			

Parties	Issue	Summary of issue raised	Applicant's response
0530, RR-0531, RR-0533, RR-0534, RR-0535, RR-0537, RR-0539, RR-0541, RR-0545, RR-0548, RR-0550, RR-0552, RR-0553, RR-0555, RR-0557, RR-0560, RR-0563, RR-0564, RR-0568, RR-0569, RR-0570, RR-0571, RR-0577, RR-0578, RR-0581, RR-0583, RR-0584, RR-0586, RR-0587, RR-0588, RR-0592, RR-0595, RR-0600, RR-0601, RR-0602, RR-0603, RR-0607, RR-0608, RR-0610, , RR-0612, RR-0613, RR-0615, RR-0616, RR-0619, RR-0621, RR-0622, RR-0623, RR-0624, RR-0626, RR-0628, RR-0633, RR-			

Parties	Issue	Summary of issue raised	Applicant's response
0635, RR-0637, RR-0639, RR-0642, RR-0646, RR-0648, RR-0651, RR-0654, RR-0655, RR-0657, RR-0658, RR-0659, RR-0661, RR-0662, RR-0663, RR-0671, RR-0672, RR-0674, RR-0675, RR-0676, RR-0678, RR-0680, RR-0681, RR-0684, RR-0685, RR-0686, RR-0689, RR-0691, RR-0692, RR-0695, RR-0697, RR-0701, RR-0704, RR-0705, RR-0707, RR-0708, RR-0709, RR-0710, RR-0712, RR-0714, RR-0716, RR-0717, RR-0720, RR-0721, RR-0722, RR-0723, RR-0726, RR-0727, RR-0730, RR-0731, RR-0733, RR-			

Parties	Issue	Summary of issue raised	Applicant's response
0735, RR-0736, RR-0741, RR-0746, RR-0748, RR-0744, RR-0756, RR-0760, RR-0764, RR-0768, RR-0771, RR-0772, RR-0773, RR-0774, RR-0775, RR-0777, RR-0780, RR-0781, RR-0784, RR-0786, RR-0787, RR-0790, RR-0792, RR-0793, RR-0794, RR-0798, RR-0800, RR-0801, RR-0804, RR-0807, RR-0808, RR-0814, RR-0815, RR-0817, RR-0818, RR-0819, RR-0820, RR-0823, RR-0824, RR-0826, RR-0827, RR-0831, RR-0839, RR-0840, RR-0854, RR-0858, RR-0863, RR-0871, RR-0874, RR-0876, RR-0879, RR-			

Parties	Issue	Summary of issue raised	Applicant's response
0881, RR-0882, RR-0885, RR-0887, RR-0889, RR-0890, RR-0893, RR-0894, RR-0895, RR-0898, RR-0901, RR-0902, RR-0903, RR-0904, RR-0905, RR-0907, RR-0908, RR-0912, RR-0918, RR-0920, RR-0922, RR-0923, RR-0925, RR-0926, RR-0939, RR-0941, RR-0943, RR-0945, RR-0949, RR-0950, RR-0952, RR-0954, RR-0956, RR-0966, RR-0967, RR-0968, RR-0969, RR-0971, RR-0972, RR-0973, RR-0974, RR-0975, RR-0976, RR-0979, RR-0982, RR-0983, RR-0984, RR-0986, RR-0990, RR-0993, RR-0999, RR-			

Parties	Issue	Summary of issue raised	Applicant's response
1001, RR-1004, RR-1006, RR- 1010, RR-1014, RR-1015, RR- 1016, RR-1018, RR-1019, RR- 1020, RR-1021, RR-1022, RR- 1023, RR-1024, RR-1025, RR- 1026,RR-1027, RR-1028, RR- 1030, RR-1031, RR-1033, RR- 1034,RR-1035, RR-1036, RR- 1037, RR-1038, RR-1040, RR- 1043, RR-1048, RR-1051, RR- 1052, RR-1053, RR-1054, RR- 1055, RR-1057, RR-1060, RR- 1063, RR-1064, RR-1066, RR- 1069, RR-1070, RR-1072, RR- 1076, RR-1077, RR-1078, RR- 1079, RR-1086, RR-1088, RR- 1089, RR-1090, RR-1096, RR-			

Parties	Issue	Summary of issue raised	Applicant's response
1097, RR-1098, RR-1101, RR-1102, RR-1105, RR-1107, RR-1109, RR-1111 RR-1112, RR-1115, RR-1116, RR-1118, RR-1119, RR-1120, RR-1121, RR-1124, RR-1125, RR-1126, RR-1128, RR-1130, RR-1131, RR-1136,RR-1140, RR-1141, RR-1143, RR-1147, RR-1148, RR-1149, RR-1150, RR-1152, RR-1154, RR-1155, RR-1158, RR-1160, RR-1164,RR-1166, RR-1167, RR-1168, RR-1174, RR-1175, RR-1181, RR-1184, RR-1185, RR-1186, RR-1188, RR-1189, RR-1193, RR-1194, RR-1196, RR-1199, RR-1203,			

Parties	Issue	Summary of issue raised	Applicant's response
RR-1204, RR-1205, RR-1206, RR-1209, RR-1210, RR-1211, RR-1214, RR-1219, RR-1221, RR-1224, RR-1225, RR-1228, RR-1230, RR-1232, RR-1234, RR-1235, RR-1239, RR-1240, RR-1241, RR-1242, RR-1243, RR-1245, RR-1246, RR-1248, RR-1250, RR-1254, RR-1256, RR-1258, RR-1259, RR-1265, RR-1268, RR-1270, RR-1272, RR-1276, RR-1277, RR-1281, RR-1283, RR-1285, RR-1295, RR-1298, RR-1299, RR-1300, RR-1301, RR-1306, RR-1307, RR-1312, RR-1314, RR-1315, RR-1316, RR-1318, , RR-			

Parties	Issue	Summary of issue raised	Applicant's response
1321, RR-1323, RR-1324, RR-1325, RR-1328, RR-1329, RR-1331, RR-1334, RR-1336, RR-1337, RR-1338, RR-1339, RR-1347, RR-1348, RR-1350, RR-1352, RR-1353, RR-1354, RR-1355, RR-1360			
RR-0004, RR-0005, RR-0006, RR-0009, RR-0018, RR-0024, RR-0037, RR-0042, RR-0047, RR-0057, RR-0069, RR-0073, RR-0099, RR-0103, RR-0106, RR-0122, RR-0123, RR-0130, RR-0136, RR-0138, RR-0141, RR-0148, RR-0199, RR-0210, RR-0220, RR-0252, RR-0266, RR-0229, RR-0322, RR-0328, RR-0334, RR-	BESS	Information presented about the BESS in the application has not addressed concerns about its safety. This includes a lack of information about how fires would be safely managed, how fumes and run-off would be safely managed, evacuation plans and impacts on emergency services.	Please see response above. In addition, the Outline Battery Fire Safety Management Plan [APP-267] has identified an Emergency Response Plan which will be prepared by the operator during the detailed design stage of the project. The Plan will cover fire safety of first responders and evacuation plans. In terms of managing fire water run-off, Annex F Drainage Technical Note [APP-098] outlines the proposed surface water drainage strategy. This notes in paragraph 3.6.6 and Section 3.10 (Fire Water Runoff) that firefighting water, and its potential contaminants would be contained within a separate lagoon structure and removed from it via controlled methods (e.g. a tanker) if the water is polluted. Therefore, it will not drain into the surface water drainage network without prior testing to confirm it is clean water.

Parties	Issue	Summary of issue raised	Applicant's response
0335, RR-0446, RR-0449, RR-0488, RR-0532, RR-0533, RR-0563, RR-0565, RR-0566, RR-0617, RR-0623, RR-0624, RR-0635, RR-0639, RR-0648, RR-0654, RR-0665, RR-0672, RR-0676, RR-0682, RR-0713, RR-0716, RR-0727, RR-0764, RR-0773, RR-0786, RR-0797, RR-0798, RR-0825, RR-0831, RR-0847, RR-0850, RR-0882, RR-0890, RR-0912, RR-0922, RR-0937, RR-0942, RR-0958, RR-0975, RR-0976, RR-0982, RR-0983, RR-1015, RR-1016, RR-1018, RR-1022, RR-1028, RR-1034, RR-1037, RR-1040, RR-			

Parties	Issue	Summary of issue raised	Applicant's response
1057, RR-1061, RR-1066, RR-1069, RR-1078, RR-1086, RR-1109, RR-1211, RR-1112, RR-1120, RR-1124, RR-1125, RR-1128, RR-1130, RR-1143, RR-1150, RR-1164, RR-1167, RR-1168, RR-1186, RR-1196, RR-1203, RR-1206, RR-1211, RR-1224, RR-1230, RR-1234, RR-1285, RR-1286, RR-1287, RR-1317, RR-1321, RR-1323, RR-1329, RR-1336, RR-1337			
RR-0132, RR-0219, RR-0227, RR-0259, RR-0260, RR-0295, RR-0513, RR-0601, RR-0607, RR-0889, RR-1023, RR-1033, RR-1124, RR-1152, RR-1160,	BESS	The Applicant has no experience operating a BESS of this scale.	The Applicant, Sunnica Ltd, is a joint venture between Tribus Energy and PS Renewables who are experienced developers of solar farms in the south of England. It is advised by consultants who are 'best in class' environmental, land referencing, land agency, consultation and public affairs, legal and technical specialists. The Applicant will implement the Scheme in accordance with the measures set out in the Outline Battery Fire Safety Management Plan.

Parties	Issue	Summary of issue raised	Applicant's response
RR-1168, RR-1180, RR-1204			
RR-0105, RR-0138, RR-0176, RR-0389, RR-0443, RR-0458, RR-0726, RR-0767, RR-1015, RR-1195, RR-1221	Cost	Has Sunnica agreed that the Scheme will be sold on in the future and has this cost been taken into account?	The Applicant has outlined how it proposes to fund its DCO obligations in the Funding Statement [APP-023] . Where the Scheme to receive development consent, the Applicant intends to retain control of the construction, operation and maintenance stages of the Scheme's lifecycle and would be involved in the long term. As is common with privately funded infrastructure projects, the Applicant would seek additional funding with the support of its legal and financial advisors to finance the Scheme's construction, operation and maintenance.
RR-0038, RR-0228, RR-0323, RR-0628, RR-0825, RR-1293	Disruption	Concern of disruption caused during operations.	The operational phase has been assessed for all environmental topics within the Environmental Impact Assessment, chapters 6 to 16 of the Environmental Statement [APP-038 to APP-048] , and a summary of environmental impacts for the operational phase is provided in Chapter 18: Summary of Environmental Effects [APP-050] . No residual significant effects are identified during operation in relation to transport and access, glint and glare, ecology, water environment, noise and vibration, human health and air quality which may cause disruption to local residents. However, it is acknowledged that there will be residual significant effects for cultural heritage and landscape and visual amenity.
RR-1142	Ecological monitoring	Monitor all habitats and mitigation areas for the duration of the operational phase to ensure these are effective and to obtain understanding of how wildlife interact with operational solar farms.	The Outline Landscape and Ecology Management Plan [APP-108] sets out the monitoring schedule for biodiversity. Monitoring periods are specific to the habitats and species and desired outcomes.
RR-1017	LGC Campus	Powers are sought to authorise retention of unspecified physical apparatus and structures on the LGC Campus but it is not clear what is proposed.	The Applicant is seeking powers on land that forms part of the LGC Campus for the laying and maintenance of the electrical cables between the solar PV site and Burwell Substation. The exact specification of the cables will be confirmed and approved during the detailed design stage once consent has been granted. Powers are also sought for temporary construction laydown areas and facilities on

Parties	Issue	Summary of issue raised	Applicant's response
			this land; however, as these are only required for the construction of the Scheme they will not be retained during the operation. Sunnica is committed to reaching agreement on the terms of the necessary property rights and is in discussions with Federated Hermes.
RR-0001, RR-0005, RR-0012, RR-0023, RR-0024, RR-0031, RR-0033, RR-0038, RR-0094, RR-0146, RR-0295, RR-0513, RR-1143	Management	Further information is required regarding liability for the Scheme once construction is complete.	Breach of a DCO is a criminal offence. The Applicant would therefore be liable for such breaches; and thus, would take on contractors on that basis. If any contractual arrangements for passing on operations to any other parties were to be entered into, this would also be subject to this fundamental starting point unless the benefit of the DCO was transferred to a third party who would take on that liability. Any such transfer would be subject to the controls set out in article 33 of the DCO.
RR-0228, RR-0628, RR-1293	Management	The need to replace Scheme infrastructure during its operational lifetime will create further disruption.	The replacement of Scheme infrastructure during operation is not expected to be a regular requirement and as a result, any disruption would be infrequent. Measures to avoid and mitigate effects during operation will be included within the Operational Environmental Management Plan (OEMP). This document will be based on the Framework OEMP provided in Appendix 16F of the Environmental Statement [APP-126] as required by the DCO.
RR-0005, RR-0012, RR-0023, RR-0031, RR-0038, RR-0295, RR-0982, RR-1143	Management	Further information is required around how maintenance and inspection will be guaranteed throughout the Scheme lifetime.	Sunnica has prepared a Framework Operational Environmental Management Plan [APP-126] which provides further information on how the Scheme will be managed, including maintenance. The need for a detailed operational management plan to be produced, and for that to be in accordance with the Framework Operational Management Plan is secured by the draft DCO [AAP-019] and therefore there is certainty that the measures in this document will be carried out.
RR-0982	Management	Clear standard operating procedures should be prepared.	Sunnica has prepared a Framework Operational Environmental Management Plan [APP-126] which provides further information on how the Scheme will be managed, including maintenance. The Framework Operational Environmental Management Plan will be secured by the DCO and therefore there is certainty that the measures in this document will be carried out.

Parties	Issue	Summary of issue raised	Applicant's response
RR-0548	Management	Damage to the PV panels by birds or storms may damage the environment.	It is considered very unlikely that damage to the PV panels would occur during the Scheme's lifetime from birds or storms, however, the Scheme infrastructure will be carefully monitored by permanent scheme staff and any damage would be repaired as soon as possible.
RR-0241, RR-0242	Management	The use of a management company represents an abdication of responsibility for the Scheme.	The Applicant is unclear what this comment is referring to. No decision has been taken to set-up a management company. In any event, breach of a DCO is a criminal offence. Sunnica Ltd as applicant would therefore be liable for such breaches; and thus, would take on contractors on that basis. If any contractual arrangements for passing on operations to any other parties were to be entered into, this would also be subject to this fundamental starting point unless the benefit of the DCO was transferred to a third party who would take on that liability. Any such transfer would be subject to the controls set out in article 33 of the DCO.
RR-0023, RR-0231	Management	There should be specific requirements to control the grass and weeds that grow beneath and around PV panels.	The grassland in and around the PV panels will be managed pursuant to the management measures set out in section 1.7 and 1.8 of the Outline Landscape and Ecology Management Plan [APP-108] , compliance with which is secured via Requirement 8 of the draft DCO [APP-019] .
AS-013	Management	Omission to include suitable Terms of Reference, Membership or a Communications Strategy for a Transport, Community Safety, Health & Wellbeing Working Group to be set up - to inform & assist the management of relevant aspects of the Scheme requiring a coordinated response from health and blue light partners, including EEAST, Cambridgeshire and Peterborough Clinical Commissioning Group (C&PCCG) and Suffolk and North East Essex Clinical Commissioning Group	The Applicant is committed to being a responsible neighbour to those living near the Scheme and will continue to engage with the local community should consent be granted. A community liaison group is one of the measures that the Applicant is proposing to implement to ensure communication with interested parties during construction, operations and decommissioning. Further information can be found in the Framework Construction Environmental Management Plan (CEMP) (Appendix 16C) [APP-123] , Framework Operation Environmental Management Plan (OEMP) (Appendix 16F) [APP-126] and Framework Decommissioning Environmental Management Plan (Appendix 16E) [APP-125] which the Applicant has published as part of the Environmental Statement. These documents also require the detailed versions of these plans to include relevant environment emergency procedures, which would enable arrangements for blue light services to be implemented. As a starting point, however, it is considered that this Scheme is a low risk scheme that does not need the instigation of the group suggested.

Parties	Issue	Summary of issue raised	Applicant's response
		(SNEECCG) (or their successor organisations).	
RR-0268, RR-0879	Management	Sunnica intends to sell the Scheme immediately and will not be around in the future.	The Applicant has outlined how it proposes to fund its DCO obligations in the Funding Statement [APP-023] . Were the Scheme to receive development consent, the Applicant intends to retain control of the construction, operation and maintenance stages of the Scheme's lifecycle and would be involved in the long term.
RR-0910	Management	What will happen when elements of the Scheme need replacing and who will pay for this?	Maintenance will be carried out and paid for by the operator. The operator will be a company commissioned by the Applicant. It is anticipated that maintenance and servicing would include the inspection, removal, reconstruction, refurbishment or replacement of faulty or broken equipment to ensure the continued effective operation of the Scheme and improve its efficiency. Further information is provided in the Framework Operation Environmental Management Plan [APP-126] .
RR-0910	Management	The profit motive will mean that Sunnica won't replace the panels during its operating life.	The Applicant does not agree with this assessment. During the Scheme's operating life, it is anticipated that maintenance and servicing would include the inspection, removal, reconstruction, refurbishment, or replacement of faulty or broken equipment to ensure the continued effective operation of the Scheme and improve its efficiency. Further information is provided in the Framework Operation Environmental Management Plan [APP-126] .
RR-0463	Management	The Scheme should 'run dark' when workers are not present.	The Scheme will not be lit, with the exception of security lighting at the Battery Energy Storage System and compound locations. However, during operation of the Scheme this will be motion detected and only required when undertaking maintenance. Further information is provided in the Framework Operation Environmental Management Plan [APP-126] .
RR-0775	Operating life	The Scheme's operating life is too long as it outlasts the expected lifetime of the PV panels.	Chapter 9 of the Statement of Need [APP-260] describes the economics of large-scale solar generation and demonstrates that solar is already more economically attractive than almost all other existing forms of generation. This statement is supported by analysis which includes the effects of degradation of PV panels. The degradation of solar efficiency over time is addressed in draft NPS EN-3 [103, Paras 2.48.8 and 2.49.9] and is referenced in Section 9.2 of the Statement of

Parties	Issue	Summary of issue raised	Applicant's response
			Need. Draft NPS EN-3 states that: <i>"Solar panels typically have a design life of between 25 and 30 years, although this can sometimes be longer, and can be decommissioned relatively easily and cheaply. Solar panel efficiency deteriorates over time and applicants may elect to replace panels during the lifetime of the site"</i>. Paragraph 2.49.9 of draft NPS EN-3 acknowledges that the design life of solar panels can sometimes be longer than 30 years. Chapter 3, Scheme Description, of the Environmental Statement [APP-035] sets out at paragraph 3.2.4 that the operational life of the Scheme is 40 years. As set out by paragraph 6.3.23 of ES Chapter 6, Climate Change of the Environmental Statement [APP-038], an indicative solar PV module type has been considered, which would have a warranty covering the first 30 years. The paragraph goes on to explain that PV panel degradation over time (from 0-40 years) has also been factored in to calculations for the performance of the Solar PV modules in assessing the climate change impact of the Scheme. It would not be an efficient use of resources to require the decommissioning of an operational solar farm before the end of its design life and 5 years before the end of the warranty period for the solar PV arrays.
RR-0863, RR-0891	Operating life	The operating life is too short for the impacts involved.	Section 1.3 of the Statement of Need [APP-260] provides a synthesis of government's current draft National Policy Statement for Renewable Energy (EN-3). EN-3 states that: <i>"Solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation worldwide. Solar farms can be built quickly and, coupled with consistent reductions in the cost of materials and improvements in the efficiency of panels, large-scale solar is now viable in some cases to deploy subsidy-free and at little to no extra cost to the consumer. The government has committed to sustained growth in solar capacity to ensure that we are on a pathway that allows us to meet net zero emissions. As such solar is a key part of the government's strategy for low-cost decarbonisation of the energy sector"</i>. [103, Para 2.47.1]

Parties	Issue	Summary of issue raised	Applicant's response
			Section 3.3 of the Statement of Need [APP-260] describes that the prompt development and deployment of proven technologies, such as solar, is a lower-risk pathway for delivering low-carbon generation both now and for the longer term, and this is consistent with the approach described by government in draft NPS EN-1 which articulates the prudence of planning infrastructure development on a conservative basis. [102, Para 3.3.11]. The Applicant has therefore brought forward proposals for a scheme which meets the urgent need for renewable generation through a means which has longevity in its operation and has sought to minimise the impacts of the scheme on the environment both during construction and during its operational life.
RR-0391	Operating life	The term of the project being 40 years would not meet the long term future requirement of the energy for this country.	Section 1.3 of the Statement of Need [APP-260] provides a synthesis of government's current draft National Policy Statement for Renewable Energy (EN-3). EN-3 states that: <i>"Solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation worldwide. Solar farms can be built quickly and, coupled with consistent reductions in the cost of materials and improvements in the efficiency of panels, large-scale solar is now viable in some cases to deploy subsidy-free and at little to no extra cost to the consumer. The government has committed to sustained growth in solar capacity to ensure that we are on a pathway that allows us to meet net zero emissions. As such solar is a key part of the government's strategy for low-cost decarbonisation of the energy sector".</i> [103, Para 2.47.1] Section 3.3 of the Statement of Need [APP-260] describes that the prompt development and deployment of proven technologies, such as solar, is a lower-risk pathway for delivering low-carbon generation both now and for the longer term, and this is consistent with the approach described by government in draft NPS EN-1 which articulates the prudence of planning infrastructure development on a conservative basis. [102, Para 3.3.11].

Parties	Issue	Summary of issue raised	Applicant's response
			The Applicant has therefore brought forward proposals for a scheme which meets the urgent need for renewable generation through a means which has longevity in its operation and has sought to minimise the impacts of the scheme on the environment both during construction and during its operational life.
RR-0858, RR-1125, RR-1196	Security	The BESS is a potential target for terrorist attacks.	The design will ensure that the compounds and solar equipment are secure to minimise the potential for damage to occur through criminal activity. Embedded mitigation will include fencing, CCTV cameras and lighting in critical areas. These are described in further detail in Chapter 3: Scheme Description of the Environmental Statement [APP-035]. There will also be a commissioning phase of testing undertaken prior to the operation phase to ensure that all equipment is operating correctly. There will be 17 permanent operations staff present on site during the day; this will allow faster responses to an intruder security alert or damage than other solar farms in the UK, which are traditionally unmanned. Furthermore, the Scheme does not process or include large scale chemicals and as such criminal damage to the infrastructure is unlikely to lead to a large-scale leak, explosion, or other major event. Therefore, the Scheme is not expected to have an effect on the environment due to the risk of a major accident occurring as a result of criminal activity during operation. For further information on the assessment of major accidents and disasters, please refer to Chapter 16: Other Environmental Topics of the Environmental Statement [APP-048].
RR-0621, RR-0644	Security	How will security be funded over the entire duration of the infrastructure's life expectancy?	Security will be funded by the operator during the Scheme's operating life. The operator will be a company commissioned by the Applicant.
RR-0963	Soil management	The site should be managed to steadily improve soil health to prepare the land to return for agricultural use.	A grass cover will be established prior to construction work commencing. Having an extended fallow will enable a recovery of soil organic matter depleted through arable management of the land.—Converting Tillage land to permanent grassland is a key measure for promoting soil organic matter recovery, identified by Defra R&D project SP008016. Farm payments have been available for many years now

Parties	Issue	Summary of issue raised	Applicant's response
			to encourage arable reversion to low input grassland. For England, payments to farms for this measure are currently £301 to £400 per hectare per year.
RR-0519, RR-0534, RR-0901	Traffic	Operational vehicles will increase local traffic levels and be disruptive for local communities.	The Applicant respectfully disagrees that operational vehicles will be disruptive for local communities. It is anticipated that there will be up to 17 permanent staff on-site during the operational phase during a single shift, with staff working on a three-shift pattern. There will also be an occasional requirement for additional staff to attend the Sites when required for maintenance and cleaning activities. If all the 17 permanent staff drove daily to the Scheme this would only result in an additional 17 vehicles on the highway network. It is noted that there is the potential for car sharing for operational staff which would reduce the number of vehicles on the highway network during the operational phase. It is not anticipated that the 17 permanent staff on-site during the operational phase will have a significant impact on the local highway network with occasional vehicle trips required for maintenance. This position has been agreed with the Highways Authorities through the EIA scoping process.

3.10 Decommissioning

3.10.1 423 individual comments were received in relation to the decommissioning of the Scheme.

Applicant's responses to RRs relating to decommissioning

Parties	Issue	Summary of issue raised	Applicant's response
RR-0006, RR-0012, RR-0024, RR-0030, RR-0038, RR-0061, RR-0076, RR-0085, RR-0097,	Approach	Insufficient information is presented regarding the decommissioning of the Scheme.	The Applicant considers that an appropriate amount of information has been presented regarding the decommissioning of the Scheme for the DCO Application. Details on the activities and measures to be taken forward during decommissioning are provided in Chapter 3: Scheme Description of the Environmental Statement [APP-035] and Appendix 16E Framework DEMP of the Environmental Statement [APP-125] . The Framework DEMP will form the basis of

Parties	Issue	Summary of issue raised	Applicant's response
RR-0105, RR-0107, RR-0109, RR-0113, RR-0121, RR-0123, RR-0134, RR-0135, RR-0136, RR-0139, RR-0140, RR-0142, RR-0157, RR-0158, RR-0162, RR-0164, RR-0177, RR-0187, RR-0189, RR-0194, RR-0195, RR-0209, RR-0218, RR-0220, RR-0228, RR-0241, RR-0251, RR-0255, RR-0264, RR-0280, RR-0442, RR-0443, RR-0452, RR-0457, RR-0458, RR-0459, RR-0463, RR-0472, RR-0498, RR-0507, RR-0508, RR-0510, RR-0539, RR-0550, RR-0564, RR-0566, RR-0577, RR-0584, RR-0600, RR-0602, RR-0610,			the detailed DEMP, which will be produced prior to decommissioning. Each technical chapter presented within the Environmental Statement (Chapters 6 to 16 [APP-038 to APP-048]) assess the potential effects during decommissioning, as well as the construction and operation phase.

Parties	Issue	Summary of issue raised	Applicant's response
RR-0624, RR-0654, RR-0663, RR-0675, RR-0722, RR-0726, RR-0736, RR-0742, RR-0758, RR-0764, RR-0786, RR-0797, RR-0823, RR-0825, RR-0871, RR-0880, RR-0891, RR-0897, RR-0902, RR-0944, RR-0958, RR-0972, RR-0975, RR-0982, RR-0983, RR-1015, RR-1029, RR-1031, RR-1034, RR-1066, RR-1074, RR-1075, RR-1095, RR-1098, RR-1112, RR-1128, RR-1142, RR-1150, RR-1164, RR-1174, RR-1189, RR-1190, RR-1206, RR-1211, RR-1212, RR-1221, RR-1229, RR-1242, RR-1255, RR-1256,			

Parties	Issue	Summary of issue raised	Applicant's response
RR-1258, RR-1295, RR-1300, RR-1308, RR-1328, RR-1335			
RR-0951	Cost	Has the cost of decommissioning been taken into account for the Scheme viability?	The cost of decommissioning has been taken into account by the Applicant. The Applicant considers the proposed Scheme to be viable. The Applicant has provided details of how it intends to fund its DCO obligations in the Funding Statement [APP-023] .
RR-0333, RR-0584, RR-0982	Disposal	The decommissioning proposals should not rely upon recycling technology that does not yet exist.	The Applicant does not agree with this assessment. Given the proposed Scheme operating life of 40 years, it is appropriate that the Applicant's decommissioning proposals be updated to reflect the realities of the time when decommissioning would occur. The Applicant has submitted a Framework Decommissioning Environmental Management Plan (DEMP) in Appendix 16E of the Environmental Statement [APP-125] with the DCO Application which provides the outline mitigation measures to be adhered to during decommissioning. The DCO includes a requirement in Schedule 2 for the preparation and approval of the DEMP substantially in accordance with the Framework DEMP, and for the approved DEMP to be implemented.
RR-0105, RR-0139, RR-0157, RR-0158, RR-0162, RR-0189, RR-0299, RR-0322, RR-0362, RR-0383, RR-0463, RR-0539, RR-0584, RR-0607, RR-0628, RR-0726, RR-0736, RR-0748, RR-0775, RR-0822, RR-0835,	Funding	A guaranteed decommissioning fund should be put in place.	There is no justification for a decommissioning fund to be put into place. The Applicant has committed to decommissioning the Scheme and this is secured by requirement 22 of the draft DCO [APP-019]. The requirement to decommission the Scheme requires a decommissioning and environmental management plan to be submitted and approved by the relevant planning authorities in advance of decommissioning commencing and that plan must be in accordance with the framework plan submitted with the application. If the undertaker does not comply with the terms of the DCO then there are enforcement provisions included in the Planning Act 2008 which would enable the relevant planning authorities to secure compliance.

Parties	Issue	Summary of issue raised	Applicant's response
RR-0936, RR-0951, RR-0972, RR-0982, RR-1074, RR-1206, RR-1335			This same approach has been used on previous solar scheme projects and the requirement to provide a decommissioning fund is not common place. Neither the undertaker for Little Crow or Cleve Hill have been required to provide one. It is also the case that, following decommissioning, the land will be returned to the landowners who will then be able to deal with the land as they wish. A decommissioning fund would therefore not be appropriate or relevant in this scenario.
RR-0161, RR-0266, RR-0331, RR-0405, RR-0406, RR-0476, RR-0488, RR-0493, RR-0497, RR-0601, RR-0611, RR-0636, RR-0746, RR-0793, RR-0814, RR-0823, RR-0967, RR-1023, RR-1080, RR-1155, RR-1174, RR-1186, RR-1188, RR-1204, RR-1221	Future use	The land will inevitably be used for housing/development.	The Applicant does not agree with this assessment. The DCO will require that the Scheme is decommissioned at the end of its 40-year operating life and that its associated infrastructure is removed. This will be a requirement enforceable through the Planning Act 2008 against the person with the benefit of the Order at that time. This is included within the Draft DCO [APP-019] . Once the Scheme has been decommissioned the land can return to agricultural production. Any further changes of use would require separate planning consent.
RR-1142	Habitats	Concerned that the created habitats will not be permanent and will be lost at the decommissioning phase, removing long-term biodiversity benefits.	The Scheme will not remove landscape and biodiversity offsets, mitigation or enhancements at the point of decommissioning and only the infrastructure elements of the Scheme would be removed, as set out in the Framework Decommissioning Environmental Management Plan [APP-125] . If after decommissioning, when the land is no longer under the control of the Applicant nor covered by this consent, a land owner decides to remove vegetation, this would be subject to applicable planning or licensing requirements as appropriate at that point in time.

Parties	Issue	Summary of issue raised	Applicant's response
RR-0228, RR-0535	Lifetime of Scheme	The Scheme will continue to operate beyond its 40-year operational lifetime.	This is incorrect. Requirement 22 in the draft DCO [APP-019] submitted with the Applicant's application ensures that " <i>decommissioning will commence no later than 40 years following the date of final commissioning</i> ".
RR-0228, RR-0274, RR-1315	Lifetime of the Scheme	It is not clear that the Scheme would be decommissioned before 40 years were over even if it became obsolete in the meantime.	In the Applicant's view, this is not something that needs to be controlled. Ultimately it is for the Applicant to deal with the commercial realities that may exist at any given time and decide whether decommissioning needs to take place before 40 years.
RR-0158, RR-0161, RR-0162, RR-0304, RR-0550, RR-0564, RR-0581, RR-0871, RR-0891, RR-0893	Management	Sunnica Ltd and its related companies won't be around in 40 years.	The Applicant has outlined how it proposes to fund its DCO obligations in the Funding Statement [APP-023] . Were the Scheme to receive development consent the Applicant intends to retain control of the construction, operation and maintenance stages of the Scheme's lifecycle and would be involved in the long term.
RR-0158, RR-0162	Management	The government will need to clean up the mess that is left behind.	The Applicant does not agree with this assessment. The DCO will require that the Scheme is decommissioned at the end of its 40-year operating life and that its associated infrastructure is removed. This will be a requirement enforceable through the Planning Act 2008 against the person with the benefit of the Order at that time. This is included within the draft DCO [APP-019] . Once the Scheme has been decommissioned the land can return to agricultural production. Any further changes of use would require separate planning consent.
RR-0014, RR-0315, RR-0324, RR-0831, RR-0897	Pollution	Pollution in the soil will mean the land cannot be returned to its current state after decommissioning	The Applicant respectfully disagrees. The management of construction activities would be controlled through the implementation of the CEMP, which will be developed prior to construction and substantially based on the Framework CEMP [APP-123] , submitted with the Application. Potential for ground and water contamination is documented within Chapter 16: Other Environmental Topics [APP-048] , Appendix 16B: Phase 1 – Preliminary Environmental Risk Assessment [APP-122] , Chapter 9: Flood Risk, Drainage and Water Resource [APP-041] . The mitigation measures related to ground and water contamination are documented in Table 3-4 and Table 3-10 of the Framework CEMP and include measures such as requirements to store oils and hydrocarbons, providing adequate bunding, provision of spill kits, drafting pollution response plans, preparing emergency spillage plans to name a few.

Parties	Issue	Summary of issue raised	Applicant's response
			The potential for contaminants to leave the solar panel is covered in Chapter 9: Flood Risk, Drainage and Water Resources of the Environmental Statement [APP-041], with no significant effect for surface or groundwaters predicted. As there is no significant effect for surface or groundwater contamination predicted, there is no pathway for any significant contamination of soil originating from the solar panels.
RR-0843	PRoW	The footpaths and rights of way lost are unlikely to be able to be restored once Sunnica has gone.	The Scheme proposes no permanent changes to the existing public right of way network, although some short-term temporary closures are required to facilitate construction. The length of time the PRoWs are forecast to be closed is expected to be a maximum of three weeks which is considered to be a worst-case scenario. The PRoWs will be restored to their previous condition following their closures. This will be documented in the next iteration of the Framework CEMP.
RR-1084, RR-1096	Reversibility	The use of concrete will make it impossible to reverse the works.	The Applicant respectfully disagrees with this statement. All concrete and other materials will be removed and cleared from site during decommissioning, unless agreed otherwise with the landowners at the time of decommissioning.
RR-0043, RR-0105, RR-0110, RR-0138, RR-0142, RR-0163, RR-0172, RR-0194, RR-0206, RR-0246, RR-0250, RR-0254, RR-0255, RR-0262, RR-0263, RR-0267, RR-0272, RR-0275, RR-0297, RR-0299, RR-0301, RR-0303, RR-0305, RR-0330, RR-0346, RR-	Reversibility	Insufficient guarantees are provided that the land will be restored to agricultural use.	The DCO requires that the Scheme is decommissioned 40 years from the date of final commissioning. This process will include the need to have a decommissioning environmental management plan in place (as secured by the DCO), to be approved by the relevant planning authority, which will include matters such as soil management, landscape and ecological elements. Ultimately, upon de-commissioning, the land will be returned to the current landowners, who will then decide how the land is managed moving forward.

Parties	Issue	Summary of issue raised	Applicant's response
0364, RR-0430, RR-0442, RR-0443, RR-0444, RR-0446, RR-0463, RR-0496, RR-0498, RR-0519, RR-0525, RR-0554, RR-0557, RR-0565, RR-0568, RR-0607, RR-0620, RR-0626, RR-0633, RR-0634, RR-0640, RR-0669, RR-0678, RR-0686, RR-0693, RR-0697, RR-0699, RR-0701, RR-0725, RR-0726, RR-0743, RR-0744, RR-0748, RR-0764, RR-0772, RR-0787, RR-0800, RR-0814, RR-0816, RR-0827, RR-0842, RR-0854, RR-0855, RR-0871, RR-0875, RR-0981, RR-0999, RR-1033, RR-1118, RR-1131, RR-1148, RR-			

Parties	Issue	Summary of issue raised	Applicant's response
1152, RR-1164, RR-1171, RR-0189, RR-1174, RR-1183, RR-1186, RR-1188, RR-1193, RR-1204, RR-1210, RR-1221, RR-1230, RR-1241, RR-1246, RR-1265, RR-1337			
RR-0007, RR-0139, RR-0160, RR-0161, RR-0163, RR-0164, RR-0169, RR-0226, RR-0260, RR-0266, RR-0281, RR-0304, RR-0334, RR-0364, RR-0391, RR-0405, RR-0406, RR-0409, RR-0430, RR-0438, RR-0476, RR-0479, RR-0488, RR-0493, RR-0497, RR-0498, RR-0539, RR-0553, RR-0554, RR-0557, RR-0569, RR-0580, RR-0589, RR-0601, RR-	Reversibility	The land will be categorised as brownfield following decommissioning of the Scheme and could be used for housing or other development.	This is not correct. On completion of decommissioning of the Scheme, the solar farm will be decommissioned, and thus the green infrastructure will be in place and there will be no elements of solar farm infrastructure on site. This process will be undertaken pursuant to a Decommissioning Environmental Management Plan that will be approved by the relevant local planning authority. The land will be returned to the current landowners. If they wish to undertake any change of use of the land, then this would require planning permission from the local planning authority.

Parties	Issue	Summary of issue raised	Applicant's response
0607, RR-0611, RR-0633, RR-0636, RR-0640, RR-0657, RR-0746, RR-0756, RR-0785, RR-0793, RR-0799, RR-0814, RR-0823, RR-0836, RR-0842, RR-0843, RR-0855, RR-0863, RR-0896, RR-0902, RR-0967, RR-1001, RR-1010, RR-1023, RR-1070, RR-1080, RR-1118, RR-1139, RR-1155, RR-1166, RR-1171, RR-1174, RR-1183, RR-1186, RR-1188, RR-1193, RR-1204, RR-1213, RR-1221, RR-1236, RR-1265, RR-1337			
RR-0164, RR-0194, RR-0195, RR-0228, RR-0274, RR-0334, RR-0565, RR-0568, RR-0816,	Reversibility	Further information is required regarding how the Scheme will be decommissioning if it fails commercially.	In the Applicant's view, this is not something that needs to be controlled. Ultimately it is for the Applicant to deal with the commercial realities that may exist at any given time and decide whether decommissioning needs to take place before 40 years.

Parties	Issue	Summary of issue raised	Applicant's response
RR-1109, RR-1136, RR-1315,			Any element of decommissioning that is undertaken at any time will be subject to the DCO Requirement for a Decommissioning Environmental Management Plan to be produced to and approved by the relevant local planning authority.
RR-0001, RR-0007, RR-0017, RR-0043, RR-0064, RR-0097, RR-0103, RR-0121, RR-0139, RR-0161, RR-0189, RR-0194, RR-0262, RR-0267, RR-0295, RR-0296, RR-0442, RR-0451, RR-0463, RR-0469, RR-0493, RR-0500, RR-0510, RR-0564, RR-0581, RR-0587, RR-0626, RR-0640, RR-0655, RR-0689, RR-0722, RR-0727, RR-0744, RR-0756, RR-0772, RR-0773, RR-0777, RR-0784, RR-0790, RR-0799, RR-0856, RR-0880, RR-0890, RR-0902, RR-0989, RR-1010,	Sustainability	Insufficient information is presented regarding the recycling of Scheme components.	Further detail on the recycling of Scheme components will be identified and provided prior to decommissioning of the Scheme as part of the Decommissioning Resource Management Plan (DRMP) as identified in the Decommissioning Environmental Management Plan [APP-125] . It is expected that recycling opportunities for solar equipment will be far more advanced in over 40 years' time (when decommissioning is due to begin) than it currently is. The Applicant will therefore balance the need to provide sufficient information to inform the DCO application without limiting the potential of the Scheme in the future at this stage in the process.

Parties	Issue	Summary of issue raised	Applicant's response
RR-1018, RR-1026, RR-1034, RR-1044, RR-1112, RR-1119, RR-1124, RR-1129, RR-1131, RR-1190, RR-1209, RR-1214, RR-1323, RR-1335			
RR-0161	Timescale	How long would decommissioning take?	As stated in Chapter 3: Scheme Description of the Environmental Statement [APP-035], decommissioning is expected to take between 12 and 24 months and will be undertaken in phases.

3.11 Ecology

3.11.1 715 individual comments were received in relation to ecology.

Applicant's responses to RRs relating to ecology

Parties	Issue	Summary of issue raised	Applicant's response
RR-0870	Animal welfare	Disturbance to the soil during construction could lead to Equine Grass Sickness and impact on horse welfare and preventative management practices should be adopted.	According to the ' <i>Management of Chronic Grass Sickness Horses</i> ' produced by the University of Edinburgh and World Horse Welfare (2019), the United Kingdom has the highest incidence of Grass Sickness (GS) worldwide; however, very few cases have been reported in North America and Ireland, despite significant movement of horses from the UK to these regions. This suggests that the occurrence of GS is more dependent on the presence or absence of an environmental factor than on direct transmission of a contagious agent between horses. Table 1 within the University of Edinburgh and World Horse Welfare document outlines the risk factors

Parties	Issue	Summary of issue raised	Applicant's response
			associated with GS; however, there is no known direct cause. Soil disturbance is only one out of the 21 factors that increase the risk of a horse developing GS. However, the Applicant recognises the risk associated with GS and the principal contractor will work with landowners along the cable route to plan the excavation in an appropriate manner to minimise the risk. This will be included in the next iteration of the Framework Construction Environmental Management Plan [APP-123] . Horses will not be located within the Solar PV site following construction.
RR-0593	Assessment	Concern that the size of the development means that the ecological impacts cannot be easily assessed.	The ecological impact assessment has followed guidance provided by the Chartered Institute of Ecology and Environmental Management (CIEEM). With reference to Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] , important ecological features identified as part of the detailed baseline surveys are reported in Tables 8-7 and 8-8, with an assessment of potential impacts undertaken in Section 8.9. Where required, the Scheme has delivered appropriate mitigation. Paragraphs 8.817 to 8.8.23 and 8.8.28 set out avoidance and mitigation measures for protected and notable species. The assessment concludes there will be no significant residual effects on important ecological features.
RR-0239, RR-0416, RR-0593, RR-0599, RR-0628, RR-0797, RR-0827	Biodiversity	The Applicant has not demonstrated that there will be a biodiversity net gain.	The Biodiversity Net Gain Assessment [APP-259] , using Defra's Biodiversity Metric 3.0, concludes that the Scheme will result in approximately 83% gain of habitat units, approximately 16% gain in hedgerow units and approximately 1% gain of river units. A further update to this document, utilising Metric 3.1, will be submitted to the Examination in due course.
RR-0880	Biodiversity	The location of the Scheme is unsuitable due to its impacts on ecologically sensitive areas.	The Scheme has sought to avoid impacts on important habitats and species, where possible. With reference to Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] , protected species identified as part of the detailed baseline surveys are reported in Tables 8-7 and 8-8, with an assessment of likely impacts and effects undertaken in section 8.9. Where required, the Scheme has delivered appropriate mitigation. Paragraphs 8.817-8.8.23 and 8.8.28 set out avoidance and mitigation measures for protected and notable species.

Parties	Issue	Summary of issue raised	Applicant's response
RR-0023, RR-0212, RR-0231	Biodiversity	The Scheme represents an opportunity to create biodiverse habitats.	The Applicant agrees with this comment and the Biodiversity Net Gain Assessment [APP-259] , using Defra's Biodiversity Metric 3.0, concludes that the Scheme will result in approximately 83% gain of habitat units, approximately 16% gain in hedgerow units and approximately 1% gain of river units. A further update to this document, utilising Metric 3.1, will be submitted to the Examination in due course.
RR-1037, RR-1069	Biodiversity	A part of the Order limits should be set aside for nature recovery.	The Outline Landscape and Ecology Management Plan [APP-108] sets out the proposed Green Infrastructure, including the management, maintenance and monitoring of biodiversity enhancements. With reference to Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] , paragraphs 8.8.4-8.8.16 set out how the Scheme has incorporated land for biodiversity.
RR-0024, RR-0073, RR-0171, RR-0184, RR-0231, RR-0254, RR-0304, RR-0354, RR-0387, RR-0416, RR-0507, RR-0521, RR-0550, RR-0555, RR-0624, RR-0628, RR-0629, RR-0630, RR-0648, RR-0697, RR-0701, RR-0703, RR-0712, RR-0821, RR-0842, RR-0857, RR-0926, RR-0972, RR-1016, RR-1024,	Biodiversity	The Scheme will lead to a net loss in biodiversity.	The Biodiversity Net Gain Assessment [APP-259] , using Defra's Biodiversity Metric 3.0, concludes that the Scheme will result in approximately 83% gain of habitat units, approximately 16% gain in hedgerow units and approximately 1% gain of river units.

Parties	Issue	Summary of issue raised	Applicant's response
RR-1026, RR-1108, RR-1164, RR-1209, RR-1210, RR-1211, RR-1212, RR-1224, RR-1230, RR-1246, RR-1256, RR-1315, RR-1334			
RR-0023, RR-0212	Biodiversity	The land beneath the PV panels should be used for biodiversity.	As set out in The Outline Landscape and Ecology Management Plan [APP-108] and Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] , land within the PV panel arrays will be used to create grassland habitats for the benefit of biodiversity.
RR-1137	Biodiversity	What little evidence there is suggests that biodiversity is negatively impacted by solar farms.	The Applicant respectfully disagrees. There is a growing body of research which demonstrates that carefully designed solar farms, managed appropriately, can significantly enhance biodiversity. In particular, Solar Energy UK have recently released 'Natural Capital Best Practice Guidance – Increasing biodiversity at all stages of a solar farm's lifecycle', which is supported by ongoing monitoring at operation solar farms throughout the UK. The Scheme has considered the principals of best practice, such as those set out in Natural England's guidance note TIN101 and BRE's 'Biodiversity Guidance for Solar Developments', when designing the Scheme. In addition, the Biodiversity Net Gain Assessment [APP-259] , using Defra's Biodiversity Metric 3.0, concludes that the Scheme will result in approximately 83% gain of habitat units, approximately 16% gain in hedgerow units and approximately 1 % gain of river units.
RR-0854	Birds	Disturbance to ground nesting birds' habitats will prevent them from returning to the area.	With reference to Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] , bird species identified as part of the detailed baseline surveys are reported in Tables 8-8, with an assessment of potential impacts undertaken in Section 8.9. Where required, the Scheme has delivered appropriate mitigation. Paragraphs 8.817-8.8.23 and 8.8.28 set out avoidance and mitigation measures for protected and notable species. The assessment concludes there will be no significant residual effects on birds, including those that nest on the ground.

Parties	Issue	Summary of issue raised	Applicant's response
RR-0896	Construction	The cabling will have a negative impact on wildlife.	Impacts on wildlife from cabling activities have been considered as part of the ecological impact assessment presented in Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] . This assessment concludes that there will be no significant residual effects.
RR-0008, RR-0009, RR-0270, RR-0316, RR-0318, RR-0457, RR-0596, RR-0842, RR-1070, RR-1130, RR-1142, RR-1211, RR-1300	Designated sites	The Scheme will negatively impact on Designated Sites, including Chippenham Fen SSSI.	Both direct and indirect impacts to Chippenham Fen and Snailwell Poor's Fen designated sites are addressed in Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] and the Habitats Regulations Assessment - Report to Inform an Appropriate Assessment [APP-092], including changes to hydrology and water quality. It is acknowledged that construction activities will occur within 100m of the Fen and, therefore, specific mitigation measures have been embedded to prevent indirect impacts, such as dust generating activities (paragraph 8.8.27 and Table 8-9 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040]) and construction noise and lighting (Table 8-9), and will be secured through the Framework Construction Environmental Management Plan [APP-123]. Table 8-9 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] sets out the potential impacts to these designated sites and explains and justifies why there will be no direct impacts. The same table also considers indirect impacts during construction, including surface water pollution and groundwater contamination, making reference to assessments provided in Chapter 9: Flood Risk, Drainage and Water Resources, of the Environmental Statement [APP-041] and the Water Framework Directive Assessment [APP-094] and construction noise (Appendix 11D – Construction Noise Modelling of the Environmental Statement [APP-112] and Figures 11-2 and 11-3 of the Environmental Statement [APP-234 and APP-235]). These assessments conclude that there will be no significant effects on the Chippenham Fen designated sites from construction. There are no pathways (e.g. habitat loss or disturbance to designated site features such as through noise, water quality, air quality, lighting or visual), during operation of the Scheme which could affect these statutory designated sites. There will be no lighting of the perimeter fence at Sunnica West Site B (save for motion sensor security lighting) and maintenance visits will be undertaken as

Parties	Issue	Summary of issue raised	Applicant's response
			outlined in Framework Operation Environmental Management Plan [APP-126] and secured through the DCO. Table 8-9 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] also considers the impacts of attraction to the solar panels for aquatic invertebrates, identifying the species included on the citations for the designated sites and provides justification as to why there will be no significant effects, based on species ecology, existing vegetation and location and orientation of the panels.
RR-0007, RR-0008, RR-0009, RR-0012, RR-0022, RR-0024, RR-0039, RR-0050, RR-0052, RR-0056, RR-0057, RR-0059, RR-0062, RR-0069, RR-0071, RR-0078, RR-0085, RR-0106, RR-0117, RR-0123, RR-0134, RR-0139, RR-0160, RR-0165, RR-0167, RR-0169, RR-0181, RR-0189, RR-0194, RR-0195, RR-0199, RR-0204, RR-0205, RR-0223, RR-	Habitats	The Scheme will result in negative impacts on wildlife habitats.	With reference to Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040], protected species identified as part of the detailed baseline surveys are reported in Tables 8-7 and 8-8, with an assessment of potential impacts undertaken in Section 8.9. Where required, the Scheme has delivered appropriate mitigation. Paragraphs 8.8.17 to 8.8.23 and 8.8.28 set out avoidance and mitigation measures for protected and notable species. The assessment concludes there will be no significant residual effects on wildlife habitats.

Parties	Issue	Summary of issue raised	Applicant's response
0224, RR-0231, RR-0232, RR-0233, RR-0241, RR-0249, RR-0251, RR-0258, RR-0260, RR-0264, RR-0279, RR-0283, RR-0288, RR-0299, RR-0301, RR-0318, RR-0322, RR-0323, RR-0325, RR-0330, RR-0334, RR-0337, RR-0338, RR-0354, RR-0365, RR-0367, RR-0369, RR-0371, RR-0373, RR-0376, RR-0379, RR-0381, RR-0388, RR-0393, RR-0395, RR-0401, RR-0402, RR-0404, RR-0407, RR-0409, RR-0414, RR-0416, RR-0417, RR-0421, RR-0422, RR-0424, RR-0432, RR-0433, RR-0437, RR-0439, RR-0450,			

Parties	Issue	Summary of issue raised	Applicant's response
RR-0452, RR-0453, RR-0454, RR-0457, RR-0458, RR-0459, RR-0460, RR-0461, RR-0467, RR-0477, RR-0481, RR-0484, RR-0506, RR-0508, RR-0510, RR-0518, RR-0519, RR-0525, RR-0537, RR-0539, RR-0548, RR-0550, RR-0554, RR-0559, RR-0568, RR-0569, RR-0578, RR-0582, RR-0584, RR-0586, RR-0589, RR-0595, RR-0602, RR-0603, RR-0607, RR-0624, RR-0629, RR-0635, RR-0637, RR-0640, RR-0642, RR-0648, RR-0655, RR-0658, RR-0659, RR-0668, RR-0669, RR-0675, RR-0691, RR-0706, RR-0719,			

Parties	Issue	Summary of issue raised	Applicant's response
RR-0731, RR-0733, RR-0737, RR-0739, RR-0743, RR-0756, RR-0760, RR-0763, RR-0772, RR-0773, RR-0784, RR-0797, RR-0840, RR-0842, RR-0847, RR-0852, RR-0853, RR-0867, RR-0871, RR-0884, RR-0889, RR-0913, RR-0914, RR-0916, RR-0919, RR-0920, RR-0923, RR-0928, RR-0929, RR-0930, RR-0932, RR-0933, RR-0934, RR-0936, RR-0937, RR-0938, RR-0944, RR-0950, RR-0952, RR-0954, RR-0956, RR-0962, RR-0967, RR-0974, RR-0975, RR-0980, RR-0981, RR-0986, RR-0988, RR-0990, RR-0996,			

Parties	Issue	Summary of issue raised	Applicant's response
RR-1000, RR-1001, RR-1004, RR-1012, RR-1019, RR-1023, RR-1025, RR-1026, RR-1028, RR-1033, RR-1036, RR-1042, RR-1054, RR-1062, RR-1063, RR-1066, RR-1070, RR-1075, RR-1076, RR-1089, RR-1091, RR-1096, RR-1108, RR-1109, RR-1115, RR-1116, RR-1118, RR-1119, RR-1131, RR-1132, RR-1142, RR-1143, RR-1152, RR-1180, RR-1185, RR-1186, RR-1193, RR-1195, RR-1206, RR-1207, RR-1213, RR-1221, RR-1224, RR-1225, RR-1228, RR-1230, RR-1231, RR-1235, RR-1236, RR-1237, RR-1240,			

Parties	Issue	Summary of issue raised	Applicant's response
RR-1254, RR-1255, RR-1264, RR-1265, RR-1266, RR-1277, RR-1282, RR-1284, RR-1285, RR-1286, RR-1296, RR-1301, RR-1304, RR-1306, RR-1307, RR-1319, RR-1320, RR-1324, RR-1325, RR-1335, RR-1353, RR-1357			
RR-0117, RR-0134, RR-0189, RR-0264, RR-0417, RR-0568, RR-0659, RR-0675, RR-0773, RR-0852, RR-0858, RR-0871, RR-1042, RR-1142, RR-1143, RR-1188, RR-1221, RR-1257, RR-1326	Habitats	The Scheme will disrupt wildlife corridors.	Existing habitat corridors such as woodlands and connecting hedgerows will be retained and protected, with additional planting in places to improve and re-enforce this connectivity. The Outline Landscape and Ecology Management Plan [APP-108] sets out the proposed Green Infrastructure, including the management, maintenance and monitoring of biodiversity enhancements. With reference to Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] , the assessment concludes that there will no disruption to habitat corridors used by the important ecological features identified.
RR-0593, RR-1142	Habitat	The proposed mitigation areas for Stone Curlew are inappropriate due to their proximity to the scheme, as well as an existing road and PRoW.	Details of the habitat creation and management is provided in Section 4 of the Offsetting Habitat Provision for Stone-Curlew Specification [APP-258] and Section 1.8 of the Landscape and Ecology Management Plan [APP-108] . The areas embedded for offsetting utilise the species' current and historical distribution across the Order limits, which includes the species successfully nesting in proximity to the existing road and PRoW network. These areas have

Parties	Issue	Summary of issue raised	Applicant's response
			been designed and will be delivered following what has been successful with the other similar habitat and nesting plots around the Breckland area.
RR-1142	Habitat	One of the proposed mitigation areas for Stone Curlew is inappropriate as it is also proposed as archaeological mitigation.	Details of stone-curlew offsetting areas, including specifics of habitat creation and management, are set out in Section 4 of the Offsetting Habitat Provision for Stone-Curlew Specification [APP-258] and Section 1.8 of the Landscape and Ecology Management Plan [APP-108]. These measures have been designed in consultation with archaeological and ecological stakeholders and are fully compatible with the protection of buried archaeology and ecological requirements. The archaeological mitigation is to retain and protect the buried archaeology from disturbance. The establishment of grassland, managed through grazing, is compatible with the protection of archaeology and as habitat for stone-curlew. Furthermore, a management plan for the archaeological areas will be created which will form part of the detailed Construction Environment Management Plan to be prepared following the appointment of a contractor, prior to the start of works. The plan will detail the areas to be excluded, the construction methodology, the long-term management proposals, and any decommissioning phase.
RR-0532	Horses	The batteries used by these large solar panel farms have been shown to have an impact on fertility of horses.	The Applicant is not aware of scientific literature of BESS associated with solar farms affecting the fertility of horses. The Applicant has sought an expert opinion on equine related issues from Professor Meriel Moore-Colyer (Professor of Equine Science at Royal Agricultural University) and Ashley Ede (Bloodstock & Horseracing specialist at Blue Furlong Consultancy) ("equine specialists"). The equine specialists stated that there is "<i>no evidence for any negative effects of working batteries on fertility in horses</i>". The batteries in normal operation are passive, closed systems which do not emit gasses or other chemicals in normal operation. The BESS do generate noise; Chapter 11: Noise and Vibration of the Environmental Statement [APP-044] contains an assessment of noise effects due to solar farm infrastructure. Predicted operational noise levels were compared with measured background noise levels using guidance in BS 4142:2014+A1:2019 and it was determined that noise effects due to solar farm infrastructure would not be significant.

Parties	Issue	Summary of issue raised	Applicant's response
			The assessment of the BESS fire has taken a worst case risk assessment approach within the Unplanned Atmospheric Emissions from Battery Energy Storage Systems (BESS) [APP-124] . The assessment has determined what the dilution rates will be for any plume from a fire as it disperses from the sites. The results show that by the time a plume were to reach the nearest receptor the pollutants would be diluted considerably. The assessment has demonstrated that even with a worst case estimate of potential pollutant release concentration, the dilution means there is no adverse impact. Therefore, this is considered unlikely to affect horse fertility.
RR-0499	Information	Insufficient information has been provided regarding restoration of trees and hedges and replacements.	The Outline Landscape and Ecology Management Plan [APP-108] sets out the landscaping proposals, including measures for hedgerow creation and infilling and tree planting and maintenance.
RR-0567	Light	Lighting should be kept to a minimum on site to avoid disturbance to wildlife.	The Scheme will not be lit, with the exception of security lighting at the Battery Energy Storage System and compound locations. However, during operation of the Scheme this will be motion detected and only required when undertaking maintenance. Further information is provided in the Framework Operation Environmental Management Plan [APP-126] . Details of lighting required during construction and operation is set out in Chapter 3: Scheme Description of the Environmental Statement [APP-035] . Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] , has assessed the impacts of lighting on important ecological features and concludes that there will be no significant effects.
RR-0599	Management	Commitment is not given to management of the conservation areas for the full period the panels will be present.	The Outline Landscape and Ecology Management Plan [APP-108] sets out the management of proposed landscape and biodiversity conservation areas including with the areas of the solar panels. Full details of the management programme for the duration of operation will be provided following DCO consent and subject to detailed design.
RR-0023, RR-0231	Management	Request for specific requirements for the control of grass and weeds that grow beneath and around the	As set out in The Outline Landscape and Ecology Management Plan [APP-108] and Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] , land within the PV panel arrays will be used to create grassland habitats for the benefit of biodiversity. Management of these grasslands will have

Parties	Issue	Summary of issue raised	Applicant's response
		solar panels that do not use herbicides/mowing.	specific prescriptions dependent upon location across the Scheme. This will predominantly utilise grazing, but mowing may be required in selective areas. The use of herbicides will not be necessary.
RR-0239, RR-0322, RR-0334, RR-0409, RR-0454, RR-0548, RR-0550, RR-0628, RR-0659, RR-0692, RR-0703, RR-0713, RR-0775, RR-0827, RR-0839, RR-0880, RR-0936, RR-1057, RR-1109, RR-1125, RR-1128, RR-1137, RR-1142, RR-1143, RR-1206, RR-1246, RR-1285	Mitigation	Proposed mitigation of ecological impacts is inadequate.	The Applicant respectfully disagrees with this statement. With reference to Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] , Section 8.8 sets out the detailed mitigation embedded within the Scheme design and the measures set out in the Framework OLEMP [APP-126] and the Framework CEMP [APP-123] . This has been based on the detailed ecological surveys undertaken and reported in Table 8-7 and 8-8 and as such, ensured that all impacts on ecology are mitigated.
RR-0880, RR-1142	Mitigation	More extensive ecological monitoring is needed.	The monitoring set out in the Outline Landscape and Ecology Management Plan [APP-108] and embedded within the Framework Operation Environmental Management Plan [APP-126] is considered proportionate to ensure establishment of created habitats and presence of associated species. Table 3-3 of the Framework Operation Environmental Management Plan [APP-126] includes the following commitment in relation to ecological monitoring, 'Annual monitoring reports will be submitted for review and consultation with stakeholders, to allow any remedial actions to be identified and agreed.'
RR-0603, RR-0821	Mitigation	Mitigation will take years to become established.	The Landscape and Ecology Management Plan [APP-108] explains that planting proposed as part of the Scheme would comprise native species which are

Parties	Issue	Summary of issue raised	Applicant's response
			prevalent in the local landscape. These are species which are known to establish well in the soils found in the area. The majority of planting stock will be forestry transplants of 40-60cm and 60-80cm in height. Smaller plants tend to establish better in the field because lifting them from the nursery at this stage in their development retains more of the root system and they can therefore more readily adapt to the conditions of the site. Feathered trees of 150-175cm and 200-250cm will also be planted in hedgerows, depending on the species specified. Trees are a characteristic feature of hedgerows and it is necessary to specify taller plants so that they are not outcompeted by faster growing shrub species in the early stages of establishment or damaged when hedgerows are cut. It is correct that the proposed planting will take some years to establish, and this is acknowledged within the landscape and visual impact assessment presented in Chapter 10 of the Environmental Statement [APP-042]. Paragraph 10.3.11 (d) states the assumption that <i>"the tree planting would have grown by an assumed 3m in height (equating to 20 centimetres per year) to range between 4m and 6.5m in height. New and existing hedgerows would be managed and maintained between 2m and 3m in height."</i>
RR-0567	Mitigation	It should be made a requirement to ensure any new overhead cables are fitted with wire markers to increase their visibility to birds who may otherwise collide with them.	No overhead cables are proposed as part of the Scheme.
RR-0880	Mitigation	Plans to import chalk to create a chalk meadow, in the Brecks which is known for its extraordinary geology is ill thought out and not supportive of native flora.	As set out in The Outline Landscape and Ecology Management Plan [APP-108] and Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] , creation of new habitats has been based on the prevailing soil types. These are not consistent across the entirety of the Scheme. Areas where the underlying soil is not chalk will not be used for chalk grassland creation.
RR-1034	Mitigation	The promise off-set land will be behind safety fencing, cutting off	The design of the proposed security fence is shown and described in section 4.7 of the Design and Access Statement [APP-264] . As described the fence will enclose the operational areas of Sunnica East Site A, Sunnica East Site B,

Parties	Issue	Summary of issue raised	Applicant's response
		established tracks and unable to be seen or enjoyed by the public.	Sunnica West Site A and Sunnica West Site B. It is not proposed at this stage to enclose the proposed ecological off-set areas.
RR-0567	Mitigation	Only one compensatory badger set is being constructed, this is insufficient.	As set out in Chapter 8: Ecology and Nature Conservation [APP-040] and Appendix 8K – Annex 8B [APP-090] of the Environmental Statement, mitigation provided for Badger is proportionate to the impacts. No further compensatory setts are required, as no further impacts to Badger are predicted.
RR-0880, RR-1142	Planting	There is a need to ensure the seed mixes proposed for planting is suitable for the soil types across the Scheme area as well as appropriate to different habitats and character areas.	An Outline Landscape and Ecology Management Plan (OLEMP) is included in the Application [APP-108] to inform the Examination and guide the future development of the Scheme post DCO consent. This provides a framework for achieving the 'vision' of the Landscaping Masterplan, as illustrated on Figures 1 to 6, in Annex A of the OLEMP. This describes species which are proposed to be included within the planting mix for new habitats. It has been informed by a study of which species are locally prevalent and suited to the character and conditions of the DCO Site. It also explains how soil samples will be used to inform preparation and seeding of grassland. Further detail on this matter will be included in the detailed LEMPs.
RR-1109	Plants	West Site B will significantly invade the primary and almost exclusive habitat of a plant protected under Section 8. There is little evidence that an alternative habitat could sustain this species. Any disruption or change to the habitat will create an extinction of the species <i>Selinum carvifolia</i> .	<i>Selinum carvifolia</i> is considered within the Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] and the Habitats Regulations Assessment - Report to Inform an Appropriate Assessment [APP-092], as part of the assessment of effects to Chippenham Fen designated sites. No significant effects have been identified for that site. The species does not occur within the Order limits.
RR-0167, RR-0186, RR-0197, RR-0260, RR-0299, RR-0305, RR-0322, RR-0334, RR-0388, RR-0415, RR-0476, RR-0481,	Plants	The Scheme will negatively impact on flowers.	With reference to Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040], protected species, including flora, is identified as part of the detailed baseline surveys are reported in Tables 8-7 and 8-8, with an assessment of potential impacts undertaken in section 8.9. Where required, the Scheme has delivered appropriate mitigation. Paragraphs 8.817 to 8.823 and 8.828 set out avoidance and mitigation measures for protected and notable species, including flora. No significant effects are identified. A net gain in

Parties	Issue	Summary of issue raised	Applicant's response
RR-0504, RR-0558, RR-0603, RR-0610, RR-0614, RR-0681, RR-0692, RR-0709, RR-0808, RR-0809, RR-0820, RR-0821, RR-1108, RR-1115, RR-1052, RR-1116, RR-1142, RR-1211, RR-1213			biodiversity as identified in the Biodiversity Net Gain Assessment [APP-259], will include greater floristic diversity and extent across the Order limits.
RR-1057	Soil	Erosion from rainwater run-off and the subsequent silting of rivers, leading to damage to the ecology of those rivers and a loss of irreplaceable topsoil.	At present the majority of the land is in arable production, with cultivation leaving bare soil vulnerable to water and wind erosion. The Scheme will have a perennial grass cover eliminating bare soil and drastically reducing both soil detachment and any movement of detached sediment. In addition, the extended fallow period will enable a recovery of soil organic matter, increasing the structural stability of topsoil, and improving rainfall infiltration. The presence of the Scheme will reduce any existing contribution of the existing site to the export of sediment (with associated phosphate, pesticides and faecal indicator organisms) from agricultural land to water courses.
RR-0022	Wildlife	The searching of historical records of the Environmental Agency data is not accurate enough to show the importance to fish stocks in the brook	Given the availability of data in connecting watercourses and assessment of suitability of habitat for fish in the surveyed watercourses (including Lee Brook, to which it is assumed the comment relates), it is considered that appropriate data was used to inform the assessment. The proposed mitigation for watercourses has been designed to ensure continued or improved habitat for fish and connectivity for fish passage, and therefore it is fair to assess that there will be no impacts to the fish populations considered likely to be present in the context of the observed habitats and scale of proposed impacts.
RR-0528, RR-1282	Wildlife	The PV panels will confuse birds on the wing.	With reference to Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040], bird species identified as part of the

Parties	Issue	Summary of issue raised	Applicant's response
			detailed baseline surveys are reported in Tables 8-8, with an assessment of potential impacts undertaken in section 8.9. Where required, the Scheme has delivered appropriate mitigation. Paragraphs 8.817 to 8.8.23 and 8.8.28 set out avoidance and mitigation measures for protected and notable species. The assessment concludes there will be no significant residual effects on birds. There is no evidence to suggest that birds will be confused by PV panels.
RR-0062, RR-0254, RR-0528, RR-1296	Wildlife	The Scheme will lead to a decrease in migratory birds.	With reference to Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040], bird species identified as part of the detailed baseline surveys are reported in Tables 8-8, with an assessment of potential impacts undertaken in Section 8.9. Where required, the Scheme has delivered appropriate mitigation. Paragraphs 8.817-8.8.23 and 8.8.28 set out avoidance and mitigation measures for protected and notable species. The assessment concludes there will be no significant residual effects on birds. The Scheme will not lead to a decrease in migratory birds.
RR-0050, RR-0260, RR-0507, RR-0519, RR-0593, RR-0596, RR-0603, RR-0607, RR-0637, RR-0659, RR-0698, RR-0709, RR-0880, RR-0936, RR-1057, RR-1142	Wildlife	The Scheme will negatively impact Stone Curlew.	The assessment of the impacts of Stone Curlew occurring outside the Breckland SPA is presented in Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] and Appendix 8M, Habitats Regulations Assessment – Report to Inform Appropriate Assessment [APP-092]. Section 5.3 of the Habitats Regulations Assessment - Report to Inform an Appropriate Assessment [APP-092] describes the fluid distribution of Stone Curlew within farming landscape of the Order limits and how the species is reliant on the cropping regime in any given year to provide suitable areas of fallow and spring-sown crops to be able to nest. As detailed in Appendix 10I, Landscape and Ecology Management Plan of the Environmental Statement [APP-258] and Section 1.8 of the Landscape and Ecology Management Plan [APP-108], the Scheme has embedded sufficient areas within the design to offset any potential reduction in arable farmland, that may, in any given year, be used by Stone Curlew and avoid a net reduction in breeding and foraging opportunities for the species.
	Wildlife	The Scheme will negatively impact on wildlife, including protected	With reference to Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040], protected species identified as part of the

Parties	Issue	Summary of issue raised	Applicant's response
RR-0010, RR-0013, RR-0014, RR-0017, RR-0036, RR-0043, RR-0046, RR-0062, RR-0073, RR-0078, RR-0086, RR-0094, RR-0098, RR-0102, RR-0107, RR-0112, RR-0114, RR-0115, RR-0132, RR-0134, RR-0138, RR-0139, RR-0142, RR-0146, RR-0154, RR-0159, RR-0171, RR-0173, RR-0174, RR-0176, RR-0183, RR-0184, RR-0187, RR-0189, RR-0190, RR-0192, RR-0193, RR-0194, RR-0195, RR-0197, RR-0199, RR-0207, RR-0209, RR-0221, RR-0226, RR-0233, RR-0236, RR-0237, RR-0241, RR-0243, RR-0245,		species such as birds, bats and badgers.	detailed baseline surveys are reported in Tables 8-8, with an assessment of potential impacts undertaken in Section 8.9. Where required, the Scheme has delivered appropriate mitigation. Paragraphs 8.817 to 8.8.23 and 8.8.28 set out avoidance and mitigation measures for protected and notable species, including birds, bats and badgers. The assessment concluded that there will be no significant effects on wildlife.

Parties	Issue	Summary of issue raised	Applicant's response
RR-0254, RR-0260, RR-0262, RR-0267, RR-0269, RR-0272, RR-0273, RR-0274, RR-0287, RR-0296, RR-0300, RR-0301, RR-0315, RR-0327, RR-0333, RR-0354, RR-0388, RR-0409, RR-0433, RR-0434, RR-0442, RR-0445, RR-0446, RR-0450, RR-0454, RR-0457, RR-0458, RR-0462, RR-0466, RR-0472, RR-0473, RR-0482, RR-0484, RR-0485, RR-0488, RR-0490, RR-0499, RR-0503, RR-0504, RR-0507, RR-0516, RR-0519, RR-0520, RR-0523, RR-0524, RR-0529, RR-0535, RR-0536, RR-0538, RR-0545, RR-0546,			

Parties	Issue	Summary of issue raised	Applicant's response
RR-0555, RR-0558, RR-0579, RR-0592, RR-0596, RR-0610, RR-0612, RR-0614, RR-0617, RR-0621, RR-0627, RR-0635, RR-0639, RR-0653, RR-0657, RR-0659, RR-0667, RR-0672, RR-0675, RR-0678, RR-0681, RR-0705, RR-0708, RR-0709, RR-0720, RR-0724, RR-0737, RR-0745, RR-0756, RR-0775, RR-0778, RR-0781, RR-0789, RR-0790, RR-0793, RR-0798, RR-0825, RR-0826, RR-0839, RR-0844, RR-0846, RR-0856, RR-0859, RR-0861, RR-0872, RR-0889, RR-0890, RR-0891, RR-0899, RR-0901, RR-			

Parties	Issue	Summary of issue raised	Applicant's response
0902, RR-0944, RR-0958, RR-0960, RR-0980, RR-0991, RR-1012, RR-1014, RR-1020, RR-1024, RR-1027, RR-1028, RR-1029, RR-1034, RR-1051, RR-1057, RR-1061, RR-1062, RR-1063, RR-1072, RR-1077, RR-1081, RR-1087, RR-1088, RR-1089, RR-1090, RR-1095, RR-1098, RR-1101, RR-1106, RR-1111, RR-1114, RR-1116, RR-1125, RR-1126, RR-1128, RR-1129, RR-1130, RR-1131, RR-1132, RR-1133, RR-1134, RR-1135, RR-1136, RR-1137, RR-1138, RR-1139, RR-1140, RR-1141, RR-1142, RR-1143, RR-1144, RR-1145, RR-1146, RR-1147, RR-1148, RR-1149, RR-1150, RR-1151, RR-1152, RR-1153, RR-1154, RR-1155, RR-1156, RR-1157, RR-1158, RR-1159, RR-1160, RR-1161, RR-1162, RR-1163, RR-1164, RR-1165, RR-1166, RR-1167, RR-1168, RR-1169, RR-1170, RR-1171, RR-1172, RR-1173, RR-1174, RR-			

Parties	Issue	Summary of issue raised	Applicant's response
1181, RR-1185, RR-1188, RR-1190, RR-1195, RR-1196, RR-1197, RR-1201, RR-1206, RR-1211, RR-1220, RR-1222, RR-1223, RR-1282, RR-1296, RR-1297, RR-1342			
RR-0287, RR-1142	Wildlife	The Scheme will negatively impact invertebrates which lay their eggs in the water, including several nationally rare species.	Table 8-9 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] considers the impacts of attraction to the solar panels for aquatic invertebrates, identifying the species included on the citations for the designated sites and provides justification as to why there will be no significant effects, based on species ecology, existing vegetation and location and orientation of the panels.
RR-0526	Wildlife	Closure of the U6006 will negatively impact bats that use it as a roost.	Footpath U6006 will be subject to temporary closure for up to seven days during construction (to facilitate a cable crossing) and will not be permanently closed. Measures to protect wildlife, including bats, are set out in the Outline Landscape and Ecology Management Plan [APP-108] and Framework Construction Environmental Management Plan [APP-123] .
RR-0526, RR-0567	Wildlife	Many of the old trees offer potential roosting sites for bats, including the old pine trees which are listed as "less likely to be a significant constrain to development [subject to detailed tree survey]" in the Sunnica bat report.	This comment is noted. Trees with potential to support roosting bats will be retained. Measures to protect wildlife, including bats, are set out in the Outline Landscape and Ecology Management Plan [APP-108] and Framework Construction Environmental Management Plan [APP-123] .
RR-0107, RR-0176, RR-0183, RR-0245, RR-0246, RR-0249,	Wildlife	Fencing will negatively impact on wildlife and reduce its ability to move around freely.	As set out in Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] paragraph 8.8.55, the perimeter fence design will include gaps to allow mammals to pass through at strategic locations.

Parties	Issue	Summary of issue raised	Applicant's response
RR-0254, RR-0277, RR-0303, RR-0307, RR-0496, RR-0592, RR-0684, RR-0698, RR-0842, RR-0851, RR-0884, RR-0896, RR-0930, RR-0939, RR-0972, RR-1033, RR-1334			
RR-0578	Wildlife	There is no guarantee species will transfer to mitigation habitats.	The mitigation set out in the Outline Landscape and Ecology Management Plan [APP-108] and Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] , is informed by detailed ecological surveys of Order limits, which have defined appropriate mitigation measures based on established practices and guidance. This provides sufficient confidence that species will transfer to mitigation habitats.
RR-0120, RR-0709	Wildlife	The area is a habitat for great crested newts.	As set out in Chapter 8: Ecology and Nature Conservation [APP-040] and Appendix 8F [APP-082] of the Environmental Statement, habitat used by Great Crested Newt will not be impacted by the Scheme.
RR-0022	Wildlife	It is important to maintain spawning places for fish and I do not think Sunnica will do this as part of ongoing management of the site.	There will be no loss of spawning places for fish. Measures to avoid and minimise runoff into watercourses during construction and operation are outlined in the Framework Construction Environmental Management Plan [APP-123] and Framework Operational Environmental Management Plan [APP-126] .
RR-0593, RR-0603	Wildlife	Concern that runoff from the solar panels will cause the eutrophication of Lee Brook which is home to several rare species.	Measures to avoid and minimise runoff into watercourses during construction and operation are outlined in the Framework Construction Environmental Management Plan [APP-123] and Framework Operational Environmental Management Plan [APP-126] . No eutrophication of Lee Brook is predicted to take place with these mitigation measures in place.

Parties	Issue	Summary of issue raised	Applicant's response
RR-1008	Air quality	Wildlife and crops could be negatively impacted by dust from construction.	A full dust risk assessment has been undertaken, in accordance with guidance from the Institute of Air Quality Management. Providing the recommended mitigation measures are implemented (secured in the DCO by the Construction Environmental Management Plan [APP-123]) the impact of dust from the site will not be significant.

3.12 Landscape and Visual Amenity

3.12.1 813 individual comments were received in relation to landscape and visual amenity.

Applicant's responses to RRs relating to landscape and visual amenity

Parties	Issue	Summary of issue raised	Applicant's response
RR-0003, RR-0012, RR-0014, RR-0047, RR-0058, RR-0246, RR-0333, RR-0531, RR-0764, RR-0769, RR-1086, RR-1107, RR-1225, RR-1235, RR-1278, RR-1282, RR-1304, RR-1317, RR-1339, RR-1357	Amenity	The loss of open space will have a negative impact on landscape amenity.	The Scheme will not result in the loss of open space. It is principally sited within existing agricultural fields, which are not publicly accessible. The Landscape and Visual Impact Assessment in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] acknowledges that there will be some adverse landscape effects due to a reduction in openness of the landscape locally and visual effects on users of the limited number of public rights of way in the area during construction and operation. Mitigation is proposed, including planting to assist in integrating the Scheme into the existing landscape pattern and for visual screening and the provision of permissive public recreation routes to enhance access to the countryside, as shown in Figures 10-14a to 10-14f of the Environmental Statement [APP-209 to APP-214] .
RR-0003, RR-0009, RR-0024, RR-0135,	Amenity	The Scheme will negatively impact on the landscape enjoyed by people walking and cycling. This	The Landscape and Visual Impact Assessment in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] has assessed the impacts on people's views on the roads and public rights of way into and out of

Parties	Issue	Summary of issue raised	Applicant's response
RR-0157, RR-0158, RR-0162, RR-0194, RR-0195, RR-0327, RR-0367, RR-0488, RR-0506, RR-0550, RR-0586, RR-0588, RR-0607, RR-0726, RR-0822, RR-0825, RR-0854, RR-0861, RR-0882, RR-0922, RR-0936, RR-0944, RR-0973, RR-1008, RR-1016, RR-1023, RR-1037, RR-1069, RR-1206, RR-1235, RR-1251, RR-1255, RR-1278		includes three out of four routes into and out of Worlington.	Worlington where there is potential for views of the Scheme. It acknowledges that there will be some adverse landscape effects due to a reduction in openness of the landscape locally and visual effects on users of the limited number of public rights of way in the area during construction and operation. The Landscape and Visual Impact Assessment has considered visual receptors (people) likely to have views of the Scheme. This includes users of Newmarket Road (VP22, VP23 and VP23a) and Golf Links Road (VP24 and VP25). Effects on these receptors would be moderate adverse during construction, which is considered significant. Effects would remain significant at year 1 of operation but would reduce to not significant by year 15 of operation as planting carried out as part of the Scheme would have established. Mitigation is proposed, including planting to assist in integrating the Scheme into the existing landscape pattern and for visual screening and the provision of permissive public recreation routes to enhance access to the countryside, as shown in Figures 10-14a to 10-14f of the Environmental Statement [APP-2209 to APP-214].
RR-0034, RR-0100, RR-0106, RR-0312, RR-0524, RR-0545, RR-1067, RR-1108, RR-1278	Amenity	The Scheme will negatively impact on residential views, including from Isleham.	The Landscape and Visual Impact Assessment in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] acknowledges that there will be some adverse effects on residential visual receptors, but that by year 15 of operation these would not be significant. It also concludes that, due to the distance between the various parts of the Scheme, none of the identified visual receptors would have views across the Scheme in its entirety. No combined effects are reported for residential visual receptors. During construction and year 1 of operation, significant adverse effects relating to the Sunnica East Site A are reported for residents of Ferry Lane (2C), Isleham (4A), adjacent to the B1104 (6), Beck Road (11A) and Lee Farm (12). Adverse

Parties	Issue	Summary of issue raised	Applicant's response
			effects are also reported for these visual receptors in year 15 of operation, but these effects are not considered significant. This is because the magnitude of impact would have reduced due to the establishment of planting and management of existing vegetation as mitigation for these effects. During construction and year 1 of operation, significant adverse effects relating to the Sunnica East Site B are reported for residents adjacent to the B1102 (14A), Badlingham Road (21A) and Queens Hill, Worlington Road (23A). By year 15 of operation, there would be no effect on residents adjacent to the B1102 (14A) or Badlingham Road (21A). Adverse effects would remain for residents of Queens Hill, Worlington Road (23A), but these would not be significant. During construction and year 1 of operation, significant adverse effects relating to the Sunnica West Site A are reported for residents adjacent to Station Road (36) and Newmarket Road (37A). No adverse effects are reported for residential visual receptors in relation to Sunnica West Site A at year 15 of operation. No adverse effects are reported for residents associated with the Sunnica West Site B during any of the assessment phases.
RR-0982	Assessment	The LVIA does not adequately consider the significance of local landscapes in Cambridgeshire and Suffolk historically or visually and their importance as settings for villages.	The Landscape and Visual Impact Assessment in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] provides a detailed assessment of landscape character with reference to published studies at national, regional, county, district and neighbourhood levels. This information is set out in detail in Appendix 10D: Published Landscape Character Extracts [APP-103] and has informed the definition by the Applicant of Local Landscape Character Areas (LLCA), which are described in Appendix 10E: Local Landscape Character Areas of the Environmental Statement [APP-104]. With reference to this information, the assessment makes it clear how the existing landscape contributes to the setting of settlements, the value of the landscape and its susceptibility to change. These judgements have been combined to determine the sensitivity of the landscape to the Scheme, against

Parties	Issue	Summary of issue raised	Applicant's response
			which the magnitude of impacts has been assessed to determine the likely significant effects and mitigation proposals have been informed. This is in line with best practice, as set out in Chapter 10: Landscape and Visual Amenity [APP-042] and Appendix 10C: Landscape and Visual Impact Assessment Methodology of the Environmental Statement [APP-102] .
RR-0134, RR-0189, RR-0659, RR-0835, RR-0944, RR-0972, RR-0982, RR-1128, RR-1136	Assessment	The LVIA understates the significance of landscape effects.	The Landscape and Visual Impact Assessment in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] presents a thorough and robust assessment of the likely significant effects of the Scheme during construction, year 1 and year 15 of operation, and decommissioning. It was prepared by Chartered Landscape Architects over a period of three years and was informed by detailed desk study, fieldwork and stakeholder engagement and was carried out alongside the iterative design process. The significance of landscape effects was determined by considering the relationship between the sensitivity of the receptor, which is determined by its value and susceptibility to change, and the magnitude of impact. This is in line with best practice, as set out in Chapter 10: Landscape and Visual Amenity [APP-042] and Appendix 10C: Landscape and Visual Impact Assessment Methodology [APP-102] of the Environmental Statement which provide the criteria which have informed the assessment.
RR-0982, RR-1206	Assessment	There appears to have been no analysis of the effects upon views for those using the PROW network.	This is not correct. Effects on the users of public rights of way (PRoW) have been thoroughly assessed within Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042], with detail regarding each receptor provided in Appendix 10H: Visual Effects [APP-107]. The assessment of visual effects relating to users of PRoW was made with reference to representative viewpoints. These were identified through desk-based study and fieldwork and in response to consultation with local planning authorities. Significant effects are reported for users of some PRoW during construction and year 1 of operation, for example recreational users of PRoW 257/002/0 (11) relating to Sunnica East Site A and recreational users including equestrian riders on U6006 (15B) relating to Sunnica East Site B. By year 15 of operation, once the proposed planting has established, effects are predicted to

Parties	Issue	Summary of issue raised	Applicant's response
			have reduced to Moderate Adverse, such that only effects on recreational users and users of the training grounds at the Limekilns (38) would remain significant.
RR-1002	Assessment	Missing information means that the LVIA is flawed.	The Applicant respectfully disagrees that any information is missing. The Landscape and Visual Impact Assessment in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] presents a thorough and robust assessment of the likely significant effects of the Scheme during construction, year 1 and year 15 of operation, and decommissioning.
RR-0228, RR-1128, RR-1246, RR-1257	BESS	The BESS is unsightly.	As shown on the Works Plans [APP-007] and described in paragraph 3.5.18 of the Design and Access Statement (DAS) [APP-264] the three BESS compounds have been located as far as practicable to make use of existing field patterns and vegetation to enclose and screen the built elements. They will comprise containers which may be joined depending on the equipment choice, which will be determined at the detailed design stage. As stated in paragraph 4.5.3 of the DAS, they will be supported by Battery Stations which will comprise the transformer, switchgear, power conversion system (PCS) or inverter, and other ancillary equipment located within compounds. The equipment will either be located outside or housed together within a container. The design principles for the BESS set out in the Design and Access Statement and secured through the DCO explain that they will be externally finished to be in keeping with the prevailing surrounding environment, most likely with a green, light grey or white painted finish. The siting, external finishes principles and proposed planting to reinforce screening have been designed to minimise effects on people's views of these elements of the Scheme.
RR-0270	Character area	The East Anglian Chalk landscape character area will be lost as a result of the Scheme, particularly due to the panels proposed south-east of Snailwell.	Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] acknowledges that there will be impacts on the landscape resulting from the construction, operation and decommissioning of the Scheme. This includes significant adverse effects on the Rolling Estate Chalklands Landscape Type defined in the Suffolk Landscape Character Assessment, during construction, year 1 of operation, year 15 of operation and decommissioning. Regarding the panels proposed southeast of Snailwell, these would be located in Parcel W03, which would be enclosed by existing woodland on the western and southern boundaries and additional planting on the northern and eastern

Parties	Issue	Summary of issue raised	Applicant's response
			boundaries. Ecological mitigation area ECO5 would introduce new native grassland to enhance the biodiversity of the area. NPS EN-1 paragraph 5.9.15 and Draft NPS EN-1 paragraph 5.10.17 state that outside of designated landscapes, the decision maker should “...<i>judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project.</i>” Paragraphs 5.9.16 and 5.10.18 of NPS EN-1 and Draft NPS EN-1, respectively, set out that in considering the above, the decision maker should take account of whether any adverse impact is temporary and/or is capable of being reversed in a reasonable timescale. NPS EN-1 paragraph 5.9.8 and Draft NPS EN-1 paragraph 5.10.9 state that “<i>Virtually all nationally significant energy infrastructure projects will have effects on the landscape</i>” with projects needing to be carefully designed with reasonable mitigation to minimise landscape harm. With regard to the balance of the further mitigation of landscape impacts and the benefits of delivery of generation capacity, NPS EN-1 paragraph 5.9.21 and Draft NPS EN-1 paragraph 5.10.23 establish that mitigation that would result in a reduction in function of an energy NSIP are only warranted in “...<i>exceptional circumstances, where mitigation could have a very significant benefit and warrant a small reduction in function</i>”. In summary, the Landscape and Visual Impact Assessment for the Scheme acknowledges that there will be some adverse effects on the East Anglian chalk landscape. However, these effects will reduce as the planting carried out as mitigation for the Scheme establishes. Taking account of the above, the Applicant considers that sufficient mitigation of landscape impact has been incorporated into the design of the Scheme, and that residual landscape impacts that have been identified do not outweigh its benefits or necessitate further mitigation.
RR-0866	Comment	Based on existing solar farms, there won't be visual/landscape impacts from the Scheme.	Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] acknowledges that there will be some impacts on the landscape, and people's views of the landscape, resulting from the construction, operation and

Parties	Issue	Summary of issue raised	Applicant's response
			decommissioning of the Scheme. The assessment demonstrates that the mitigation embedded in the design of the Scheme would reduce the majority of effects to not significant by year 15 of operation. These conclusions are supported by the visual material in the Application, including the photomontages presented in Figures 10-90 [APP-220] to Figure 10-101 [APP-232] of the Environmental Statement. These show that due to the flat or gently undulating landscape, relatively low height of the solar panel arrays and careful positioning of other elements, existing vegetation and proposed planting would largely screen or filter views of built elements.
RR-0251, RR-0835, RR-1063	Landscape and visual impact	The Scheme is located at the junction of the Fens, Breckland and rolling Chalkland landscapes and will blur these together.	The Landscape and Visual Impact Assessment presented in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] is supported by a detailed assessment of landscape character at various scales, from the National Character Areas (NCA) defined by Natural England through to Local Landscape Character Areas (LLCA) defined by the Applicant. This forms the baseline against which landscape effects have been assessed. Extracts from relevant published landscape character assessments are provided in Appendix 10D: Published Landscape Character Extracts of the Environmental Statement [APP-103] and detailed descriptions of LLCAs are provided in Appendix 10E: Local Landscape Character Areas of the Environmental Statement [APP-104]. The relationship between Landscape Character Areas (LCA) defined in published studies and LLCAs defined by the Applicant is explained in section 4 of Appendix 10E: Local Landscape Character Areas of the Environmental Statement [APP-104]. The majority of the Scheme is located within the northern part of NCA 87: East Anglian Chalk, which includes the higher ground around Newmarket and lower lying areas north of the A14. Sunnica East Site B lies on the southern periphery of NCA 85: The Brecks. A very small part of Sunnica East Site A falls within NCA 46: The Fens. Natural England in its Approach to Landscape Character Assessment notes that boundaries between landscape character areas are rarely precise and generally represent zones of transition where NCAs converge. The National Character

Parties	Issue	Summary of issue raised	Applicant's response
			Areas presented in Figure 10-5 of the Environmental Statement [APP-195] show that the Scheme lies at such a point of transition in the landscape. As such, it shares some characteristics between different areas and some characteristics are weaker than parts more central to these NCAs. The character of the landscape is therefore already blurred. The LCAs defined at the regional, county and neighbourhood level and the LLCAs defined by the Applicant therefore provide additional detail to understand how the character differs locally within these zones of transition. NPS EN-1 paragraph 5.9.15 and Draft NPS EN-1 paragraph 5.10.17 state that outside of designated landscapes, the decision maker should “...<i>judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project.</i>” Paragraphs 5.9.16 and 5.10.18 of NPS EN-1 and Draft NPS EN-1, respectively, set out that in considering the above, the decision maker should take account of whether any adverse impact is temporary and/or is capable of being reversed in a reasonable timescale. NPS EN-1 paragraph 5.9.8 and Draft NPS EN-1 paragraph 5.10.9 state that “<i>Virtually all nationally significant energy infrastructure projects will have effects on the landscape</i>” with projects needing to be carefully designed with reasonable mitigation to minimise landscape harm. With regard to the balance of the further mitigation of landscape impacts and the benefits of delivery of generation capacity, NPS EN-1 paragraph 5.9.21 and Draft NPS EN-1 paragraph 5.10.23 establish that mitigation that would result in a reduction in function of an energy NSIP are only warranted in “...<i>exceptional circumstances, where mitigation could have a very significant benefit and warrant a small reduction in function</i>”. Taking account of the above, the Applicant considers that sufficient mitigation of landscape and visual impacts have been incorporated into the design of the Scheme, and that residual landscape impacts that have been identified do not outweigh its benefits or necessitate further mitigation.

Parties	Issue	Summary of issue raised	Applicant's response
RR-0165	Landscape and visual impact	The Scheme will impact upon the Fenland landscape.	The Landscape and Visual Impact Assessment presented in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] is supported by a detailed assessment of landscape character at various scales, from the National Character Areas (NCA) defined by Natural England through to Local Landscape Character Areas (LLCA) defined by the Applicant. The majority of the Scheme is located within the northern part of NCA 87: East Anglian Chalk, which includes the higher ground around Newmarket and lower lying areas north of the A14. Sunnica East Site B lies on the southern periphery of NCA 85: The Brecks. A very small part of Sunnica East Site A falls on the southern edge of NCA 46: The Fens, which extends north to Lincoln. At the county level, the Settled Fenland Landscape Type is found in narrow bands east of Isleham and between Snailwell and Burwell. No significant effects have been identified with respect to these receptors. Moderate adverse effects have been identified in relation to LLCA 36: Burwell Fen in construction, relating to intra-project effects. Effects on this receptor would not be significant during operation or decommissioning. In summary, impacts on the Fenland landscape will be very limited and will not result in significant effects during operation. NPS EN-1 paragraph 5.9.15 and Draft NPS EN-1 paragraph 5.10.17 state that outside of designated landscapes, the decision maker should "...judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project." Paragraphs 5.9.16 and 5.10.18 of NPS EN-1 and Draft NPS EN-1, respectively, set out that in considering the above, the decision maker should take account of whether any adverse impact is temporary and/or is capable of being reversed in a reasonable timescale. NPS EN-1 paragraph 5.9.8 and Draft NPS EN-1 paragraph 5.10.9 state that "Virtually all nationally significant energy infrastructure projects will have effects on the landscape" with projects needing to be carefully designed with reasonable mitigation to minimise landscape harm. With regard to the balance of the further mitigation of landscape impacts and the benefits of delivery of

Parties	Issue	Summary of issue raised	Applicant's response
			generation capacity, NPS EN-1 paragraph 5.9.21 and Draft NPS EN-1 paragraph 5.10.23 establish that mitigation that would result in a reduction in function of an energy NSIP are only warranted in "...<i>exceptional circumstances, where mitigation could have a very significant benefit and warrant a small reduction in function</i>". Taking account of the above, the Applicant considers that sufficient mitigation of landscape impact has been incorporated into the design of the Scheme, and that residual landscape impacts that have been identified do not outweigh its benefits or necessitate further mitigation.
RR-0270, RR-0391, RR-0573, RR-0582, RR-0590, RR-0595, RR-0605, RR-0741 RR-0825, RR-0969, RR-1026, RR-1102, RR-1144, RR-1164	Landscape and visual impact	The Scheme will fundamentally change the setting of the Limekilns.	The Limekilns is identified as Local Landscape Character Area (LLCA) 26: The Limekilns and Gallops in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042]. As described in Appendix 10E: Local Landscape Character Areas of the Environmental Statement [APP-104], LLCA 26 "consists of the open, undulating gallops and large scale equestrian land uses to the east of Newmarket, which lie to the south of the A14 and include a section of the A14 to the north of Newmarket." Its immediate setting to the north is therefore already influenced by major infrastructure, beyond which the Scheme lies. It is not a designated landscape, but is well maintained and overall, its sensitivity has been assessed as medium. No development is proposed within LLCA 26. Its key characteristics and boundaries would be retained and overall, the magnitude of impact in all assessment phases has been assessed as low. Therefore, it is not correct to say that the setting of the Limekilns would be fundamentally changed by the Scheme. NPS EN-1 paragraph 5.9.15 and Draft NPS EN-1 paragraph 5.10.17 state that outside of designated landscapes, the decision maker should "...<i>judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project.</i>" Paragraphs 5.9.16 and 5.10.18 of NPS EN-1 and Draft NPS EN-1, respectively, set out that in considering the

Parties	Issue	Summary of issue raised	Applicant's response
			above, the decision maker should take account of whether any adverse impact is temporary and/or is capable of being reversed in a reasonable timescale. NPS EN-1 paragraph 5.9.8 and Draft NPS EN-1 paragraph 5.10.9 state that <i>"Virtually all nationally significant energy infrastructure projects will have effects on the landscape"</i> with projects needing to be carefully designed with reasonable mitigation to minimise landscape harm. With regard to the balance of the further mitigation of landscape impacts and the benefits of delivery of generation capacity, NPS EN-1 paragraph 5.9.21 and Draft NPS EN-1 paragraph 5.10.23 establish that mitigation that would result in a reduction in function of an energy NSIP are only warranted in <i>"...exceptional circumstances, where mitigation could have a very significant benefit and warrant a small reduction in function"</i>. Taking account of the above, the Applicant considers that sufficient mitigation of landscape impact has been incorporated into the design of the Scheme, and that residual landscape impacts that have been identified do not outweigh its benefits or necessitate further mitigation.
RR-0035, RR-0296, RR-0605, RR-0607, RR-0825, RR-0842, RR-0857, RR-0868, RR-1026, RR-1029, RR-1128	Landscape and visual impact	Visual connectivity between villages will be destroyed.	The statement that visual connectivity between villages will be destroyed is not supported by evidence. Due to the relatively flat landscape and abundance of mature vegetation on settlement boundaries, existing visual connections between settlements within the study area are limited. The Scheme has been designed to conserve visual connections between existing settlements where they exist, for example between Chippenham and Freckenham where no solar farm development is proposed. The conclusions of the Landscape and Visual Impact Assessment are set out in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] and are supported by photomontages of the Scheme presented in Figures 10-90 [APP-220] to 10-102 [APP-232] of the Environmental Statement.
RR-1136	Landscape and visual impact	The LVIA impacts of Sunnica West sites A and B and Sunnica East B mean these are inappropriate locations for development.	Paragraph 5.9.8 of the National Policy Statement for Energy (NPS EN-1) addresses two points which are important in understanding how the potential impacts of the Scheme relate to landscape and views. It first states that <i>"landscape effects depend on the existing character of the local landscape, its</i>

Parties	Issue	Summary of issue raised	Applicant's response
			<i>current quality, how highly it is valued and its capacity to accommodate change. All of these factors need to be considered in judging the impact of a project on landscape. “</i> <i>It also states that “virtually all nationally significant energy infrastructure projects will have effects on the landscape. 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.”</i> Development proposed within national designated landscapes is addressed separately in paragraphs 5.9.9 to 5.9.11 of NPS EN-1. Paragraph 5.9.14 deals with development outside nationally designated areas, stating that “<i>there are local landscapes that may be highly valued locally and protected by local designation</i>”. While the Landscape and Visual Impact Assessment (LVIA) in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] identifies some areas of higher landscape value and sensitivity, the landscape within the Order limits and the wider study area is not recognised for its value through national or local landscape designations. The LVIA summarised in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] has assessed the potential impacts on the landscape at scales ranging from national to local, using evidence from published landscape character assessments and LLCA defined by the Applicant. It also includes a separate assessment of the impacts of each Site within the Scheme and an assessment of intra-project effects where relevant. This enables distinctions to be drawn regarding the geographical scale of likely significant effects in line with best practice. The assessment identifies that significant intra-project residual effects of operation on the landscape would be focussed within the LT Rolling Estate Chalklands defined in the Suffolk Landscape Character Assessment.

Parties	Issue	Summary of issue raised	Applicant's response
			The LVIA has concluded that there would be few locations where more than one part of the Scheme would be visible. However, there are some roads and public rights of way which either pass through or are adjacent to the Sites where there would be sequential views of the Scheme. Representative viewpoints have been used within the assessment to illustrate the nature of views for different visual receptors and how the effects of the Scheme would differ along such routes. The management of existing vegetation and the establishment of proposed planting is predicted to reduce most visual effects to not significant by year 15 of operation. The only visual receptors predicted to experience significant residual effects in year 15 of operation are people visiting the Limekilns Gallops, including members of the Jockey Club and members of the public who use the space informally or to view the horses between breaks in the roadside vegetation. These receptors are represented by Viewpoint 38. In summary, it is acknowledged that there will be adverse residual landscape effects at the scale of the Rolling Estate Chalklands LT defined in the Suffolk Landscape Character Assessment. A finer grained assessment has determined that there would be variation in the extent of significant effects at the local level, focused within the Sites and some LLCAs defined by the Applicant. These effects would not be of such an extent that the Scheme would radically change the sense of place, the place attachment of the residents, and the recreational amenities of the affected villages and communities. The LVIA has not concluded that the Scheme would dominate and transform the local landscape to the extent that it would be altered beyond recognition and does not conclude that the Sites are inappropriate locations for solar farm development. The mitigation proposed to address adverse effects of the Scheme is the product of an iterative process, informed by the LVIA over several years. Further planting would not further reduce the significance of the effects reported.
R-0009, RR-0013, RR-0024, RR-0034, RR-0038, RR-0069, RR-0079, RR-	Landscape and visual impact	The Scheme will have a negative visual impact.	Paragraph 5.9.15 of the National Policy Statement for Energy (NPS EN-1) states that the scale of energy projects means that <i>"they will often be visible within many miles of the site of the proposed infrastructure. The IPC should judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project"</i> . NPS EN-1 addresses all types of energy development, including power stations with tall stacks and

Parties	Issue	Summary of issue raised	Applicant's response
0081, RR-0083, RR-0106, RR-0119, RR-0120, RR-0134, RR-0140, RR-0161, RR-0171, RR-0177, RR-0180, RR-0181, RR-0189, RR-0194, RR-0196, RR-0197, RR-0199, RR-0200, RR-0201, RR-0204, RR-0219, RR-0228, RR-0233, RR-0235, RR-0248, RR-0249, RR-0263, RR-0276, RR-0302, RR-0303, RR-0306, RR-0309, RR-0320, RR-0341, RR-0344, RR-0355, RR-0358, RR-0370, RR-0397, RR-0417, RR-0422, RR-0446, RR-0457, RR-0460, RR-0465, RR-0466, RR-0484, RR-0485, RR-			plumes and wind turbines. The nature of solar farm development is such that, whilst it is larger in geographical scale, the majority of elements are low in height and more readily screened by existing and proposed features, including vegetation. The Landscape and Visual Impact Assessment (LVIA) in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] identifies visual receptors (people) who may have views of the Scheme and assesses the potential impacts and likely significant effects on these receptors during construction, operation and decommissioning. The LVIA concludes that there will be some adverse (negative) effects on visual receptors, particularly during the construction and decommissioning phases, although these effects will be temporary. Effects have also been identified during the early years of operation, but by year 15 of operation when the planting proposed as part of the Scheme will have established, these effects are predicted to have reduced to Moderate Adverse, such that only recreational users and users of the training grounds at the Limekilns (38) would still experience adverse visual effects which are considered significant. This is due to the elevated nature of the viewing place, which is in contrast to the flat landscape within the rest of the study area.

Parties	Issue	Summary of issue raised	Applicant's response
0486, RR-0490, RR-0491, RR-0498, RR-0499, RR-0510, RR-0513, RR-0519, RR-0520, RR-0523, RR-0535, RR-0539, RR-0545, RR-0568, RR-0583, RR-0584, RR-0585, RR-0590, RR-0605, RR-0609, RR-0611, RR-0614, RR-0617, RR-0624, RR-0627, RR-0628, RR-0629, RR-0634, RR-0639, RR-0642, RR-0643, RR-0646, RR-0653, RR-0655, RR-0659, RR-0663, RR-0668, RR-0672, RR-0673, RR-0674, RR-0677, RR-0681, RR-0682, RR-0689, RR-0690, RR-0693, RR-0697, RR-0706, RR-			

Parties	Issue	Summary of issue raised	Applicant's response
0708, RR-0709, RR-0712, RR-0720, RR-0721, RR-0724, RR-0726, RR-0730, RR-0731, RR-0735, RR-0736, RR-0737, RR-0738, RR-0741, RR-0744, RR-0758, RR-0762, RR-0764, RR-0771, RR-0778, RR-0780, RR-0784, RR-0786, RR-0788, RR-0790, RR-0793, RR-0797, RR-0825, RR-0830, RR-0847, RR-0855, RR-0858, RR-0860, RR-0874, RR-0877, RR-0888, RR-0896, RR-0898, RR-0936, RR-0939, RR-0944, RR-0956, RR-0974, RR-0975, RR-0981, RR-0982, RR-0985, RR-0991,RR-			

Parties	Issue	Summary of issue raised	Applicant's response
1003, RR-1012, RR-1014, RR-1029, RR-1037, RR-1040, RR-1044, RR-1061, RR-1067, RR-1070, RR-1087, RR-1093, RR-1102, RR-1125, RR-1127, RR-1128, RR-1136, RR-1144, RR-1145, RR-1147, RR-1152, RR-1161, RR-1164, RR-1172, RR-1184, RR-1188, RR-1206, RR-1209, RR-1211, RR-1219, RR-1220, RR-1221, RR-1222, RR-1239, RR-1240, RR-1269, RR-1293, RR-1296, RR-1298, RR-1301, RR-1306, RR-1325, RR-1334, RR-1339			
RR-0539	Landscape and visual impact	Access arrangements will have a negative visual impact.	Figure 3-19A: Construction Compounds and Access Sunnica East Sites A and B [APP-152] and Figure 3-19B: Construction Compounds and Access Sunnica

Parties	Issue	Summary of issue raised	Applicant's response
			West Sites A and B [APP-153] show the location of access points for the construction, operation and decommissioning phases of the Scheme. As is evident from these figures, these access points have been minimised and selected to, as far as practicable, avoid places where sensitive visual receptors are located and utilise existing access points. The majority are on rural roads between settlements where effects would be limited to oblique views from passing vehicles such that views would be glimpsed and fleeting, such as for motorists on Snailwell Road, as they cross the River Snail. Appendix 10H: Visual Effects of the Environmental Statement [APP-107] identifies those receptors which would be affected by changes in their views relating to access points.
RR-0001, RR-0194, RR-0195, RR-0228, RR-0297, RR-0303, RR-0305, RR-0307, RR-0331, RR-0338, RR-0352, RR-0380, RR-0405, RR-0432, RR-0444, RR-0495, RR-0509, RR-0524, RR-0545, RR-0549, RR-0568, RR-0640, RR-0657, RR-0734, RR-0748, RR-0884, RR-0956, RR-0972, RR-1070, RR-1148, RR-1152, RR-1166, RR-1209,	Landscape and visual impact	Site fencing will have a negative visual impact.	Adverse (negative) effects have been identified for some visual receptors during construction, year 1 of operation and decommissioning, when there could be more open views of perimeter fencing through vegetation. Proposed boundary fences are shown on Figure 3-1: Sunnica East Parameter Plan [APP-135] and Figure 3-2: Sunnica West Parameter Plan [APP-136] . As illustrated in Figures 8 to 13 of the Landscape and Ecology Management Plan [APP-108] proposed boundary fences are generally offset from field boundaries and on the inside of vegetation lining roads and property boundaries. This means that they would largely be screened by existing or proposed vegetation by year 15 of operation and visual effects would not be significant.

Parties	Issue	Summary of issue raised	Applicant's response
RR-1297, RR-1337			
RR-0881, RR-0887	Landscape and visual impact	The Scheme will damage views from La Hogue Farm Shop.	La Hogue Farm Shop is located north of La Hogue Road and approximately 200m west of the busy A11 trunk road. It comprises a small farm shop and cafe, an outdoor children's play facility and adjacent car park on the southern edge of a small complex of active farm buildings. Views of visitors to La Hogue Farm are represented by Viewpoint 33 in the Landscape and Visual Impact Assessment summarised in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] and set out in detail in Appendix 10H: Visual Effects of the Environmental Statement [APP-107]. Effects are assessed as significant during construction due to the proximity of plant and machinery across parcels W10 and W12. Effects would remain significant at year 1 of operation where the top of solar panel arrays and the BESS and substation would be visible to the south, although the magnitude of impact would reduce to medium. However, by year 15 of operation, when proposed planting would have established to screen development but also slightly reduce the extent of views beyond, these effects would reduce to not significant. NPS EN-1 paragraph 5.9.15 and Draft NPS EN-1 paragraph 5.10.17 state that outside of designated landscapes, the decision maker should "...judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project." Paragraphs 5.9.16 and 5.10.18 of NPS EN-1 and Draft NPS EN-1, respectively, set out that in considering the above, the decision maker should take account of whether any adverse impact is temporary and/or is capable of being reversed in a reasonable timescale. NPS EN-1 paragraph 5.9.8 and Draft NPS EN-1 paragraph 5.10.9 state that "Virtually all nationally significant energy infrastructure projects will have effects on the landscape" with projects needing to be carefully designed with reasonable mitigation to minimise landscape harm. With regard to the balance of the further mitigation of landscape impacts and the benefits of delivery of generation capacity, NPS EN-1 paragraph 5.9.21 and Draft NPS EN-1

Parties	Issue	Summary of issue raised	Applicant's response
			paragraph 5.10.23 establish that mitigation that would result in a reduction in function of an energy NSIP are only warranted in "...<i>exceptional circumstances, where mitigation could have a very significant benefit and warrant a small reduction in function</i>". Taking account of the above, the Applicant considers that sufficient mitigation of landscape and visual impacts have been incorporated into the design of the Scheme, and that residual landscape impacts that have been identified do not outweigh its benefits or necessitate further mitigation.
RR-0607	Landscape and visual impact	All routes in and out of villages will be affected.	The Landscape and Visual Impact Assessment set out in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] concludes that there will be some effects on the views of people travelling on some routes in and out of villages as a consequence of the construction, operation and decommissioning of the Scheme. However, the majority of these effects would be short term and none are predicted to be significant by year 15 of operation, by which time planting carried out as part of the Scheme would have fully established. Taking an example from Sunnica East Sites A and B, significant effects would arise for people travelling along Golf Links Road between Red Lodge and Worlington (viewpoints 24 and 25) during construction and year 1 of operation due to the proximity of the receptor to the Scheme. Effects on the views of people travelling west from Worlington to Freckenham on the B1102 Freckenham Road (Viewpoint 14) would be significant during construction, but not significant during operation or decommissioning due to the distance from built development and the oblique nature of views from the road. Turning to Sunnica West Sites A and B, the majority of development would be located away from public roads between settlements. Significant effects have been identified for people travelling along Snailwell Road between Snailwell and Fordham (Viewpoint 46) during construction, due to the height of proposed construction plant. Effects are not predicted to be significant during operation or

Parties	Issue	Summary of issue raised	Applicant's response
			decommissioning due to the brief exposure to views, oblique to the direction of travel of the tops of panels beyond intervening vegetation. Taking account of the governments' policy position above, the Applicant considers that sufficient mitigation of landscape and visual impacts have been incorporated into the design of the Scheme, and that residual landscape impacts that have been identified do not outweigh its benefits or necessitate further mitigation.
RR-0320, RR-0557, RR-0841	Landscape character	The Scheme will destroy the heathland landscape around Newmarket.	The Scheme will not destroy the heathland landscape around Newmarket. The landscape effects of the Scheme have been studied in detail within Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042]. Appendix 10D: Published Landscape Character Extracts [APP-103] provides extracts from published landscape character assessments of relevance to the study area. This information has been used to inform the definition of Local Landscape Character Areas (LLCA), which are shown on Figure 10-10 [APP-200] and are described in Appendix 10E: Local Landscape Character Areas [APP-104] of the Environmental Statement. Three of these LLCAs make reference to heathland characteristics, all of which lie outside of the Order limits. These are LLCA 15: Red Lodge, LLCA 16: Brecks Estate Heathland and LLCA 26: The Limekilns and Gallops. In the case of LLCA 15 and 16, effects are predicted to be neutral in all phases. Due to the elevated nature of LLCA 26, impacts on the setting are predicted, but the low magnitude would lead to these effects being Minor Adverse and not significant in all phases of the project. The majority of the land within the Order limits is formed of intensively managed arable fields and pasture and does not exhibit the heathland characteristics found in the wider landscape.
RR-0001, RR-0008, RR-0009, RR-0010, RR-0024, RR-0030, RR-0035, RR-0039, RR-0041,	Landscape character	The Scheme is industrialising and will result in a loss of countryside.	The Landscape and Visual Impact Assessment in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] recognises that proposed structures would introduce an infrastructure character and alter the 'open' character of the landscape at the site level. Combined effects are also reported for the LT Rolling Estate Chalklands in year 1 of operation, reducing to not significant by year 15 of operation due to the Scheme remaining a relatively

Parties	Issue	Summary of issue raised	Applicant's response
RR-0043, RR-0044, RR-0045, RR-0052, RR-0053, RR-0078, RR-0080, RR-0086, RR-0088, RR-0089, RR-0099, RR-0102, RR-0111, RR-0118, RR-0127, RR-0135, RR-0136, RR-0137, RR-0138, RR-0140, RR-0142, RR-0146, RR-0152, RR-0157, RR-0158, RR-0159, RR-0162, RR-0163, RR-0168, RR-0169, RR-0172, RR-0174, RR-0175, RR-0176, RR-0177, RR-0178, RR-0180, RR-0182, RR-0189, RR-0190, RR-0193, RR-0194, RR-0196, RR-0199, RR-0201, RR-0204, RR-0205, RR-0206,			small geographic part of the wider published studies, balanced with the further establishment of the proposed Green Infrastructure. The Scheme has been designed with built elements to be laid out within the existing natural features and landscape pattern of fields and landscape framework of hedgerows, shelter belts and woodland. Planting is proposed to strengthen this landscape framework with extensive grassland swards extending beneath panels and across ecological mitigation areas.

Parties	Issue	Summary of issue raised	Applicant's response
RR-0219, RR-0222, RR-0224, RR-0228, RR-0232, RR-0240, RR-0246, RR-0250, RR-0256, RR-0270, RR-0274, RR-0275, RR-0278, RR-0280, RR-0301, RR-0310, RR-0320, RR-0330, RR-0339, RR-0341, RR-0344, RR-0346, RR-0348, RR-0355, RR-0366, RR-0373, RR-0374, RR-0375, RR-0377, RR-0378, RR-0379, RR-0384, RR-0398, RR-0400, RR-0405, RR-0418, RR-0428, RR-0435, RR-0438, RR-0439, RR-0440, RR-0443, RR-0444, RR-0446, RR-0449, RR-0450, RR-0452, RR-0454,			

Parties	Issue	Summary of issue raised	Applicant's response
RR-0459, RR-0460, RR-0462, RR-0464, RR-0467, RR-0471, RR-0472, RR-0474, RR-0479, RR-0480, RR-0481, RR-0482, RR-0483, RR-0484, RR-0485, RR-0486, RR-0488, RR-0491, RR-0495, RR-0498, RR-0499, RR-0502, RR-0503, RR-0505, RR-0506, RR-0509, RR-0513, RR-0516, RR-0517, RR-0528, RR-0530, RR-0531, RR-0536, RR-0538, RR-0550, RR-0554, RR-0563, RR-0564, RR-0568, RR-0573, RR-0577, RR-0584, RR-0585, RR-0578, RR-0586, RR-0588, RR-0589, RR-0593,			

Parties	Issue	Summary of issue raised	Applicant's response
RR-0607, RR-0611, RR-0612, RR-0614, RR-0615, RR-0618, RR-0632, RR-0633, RR-0634, RR-0636, RR-0637, RR-0645, RR-0649, RR-0653, RR-0657, RR-0658, RR-0659 RR-0661, RR-0662, RR-0663, RR-0667, RR-0668, RR-0674, RR-0675, RR-0678, RR-0682, RR-0685, RR-0691, RR-0692, RR-0695, RR-0697, RR-0701, RR-0708, RR-0709, RR-0712, RR-0714, RR-0721, RR-0734, RR-0735, RR-0737, RR-0746, RR-0764, RR-0767, RR-0769, RR-0771, RR-0772, RR-0775, RR-			

Parties	Issue	Summary of issue raised	Applicant's response
0779, RR-0785, RR-0789, RR-0793, RR-0795, RR-0799, RR-0801, RR-0802, RR-0805, RR-0806, RR-0807, RR-0808, RR-0809, RR-0817, RR-0823, RR-0825, RR-0827, RR-0828, RR-0832, RR-0835, RR-0836, RR-0837, RR-0842, RR-0845, RR-0852, RR-0857, RR-0868, RR-0871, RR-0882, RR-0884, RR-0890, RR-0891, RR-0895, RR-0902, RR-0904, RR-0906, RR-0910, RR-0911, RR-0924, RR-0929, RR-0934, RR-0935, RR-0949, RR-0953, RR-0956, RR-0957, RR-0960, RR-0965 RR-			

Parties	Issue	Summary of issue raised	Applicant's response
0967, RR-0969, RR-0971, RR-0972, RR-0975, RR-0976, RR-0978, RR-0980, RR-0982, RR-0986, RR-0989, RR-0990, RR-0999, RR-1000, RR-1001, RR-1007, RR-1013, RR-1016, RR-1018, RR-1023, RR-1025, RR-1027, RR-1030, RR-1032, RR-1033, RR-1035, RR-1036, RR-1037, RR-1040, RR-1047, RR-1048, RR-1050, RR-1057, RR-1059, RR-1061, RR-1062, RR-1064, RR-1065, RR-1066, RR-1069, RR-1070, RR-1071, RR-1075, RR-1082, RR-1086, RR-1088, RR-1093, RR-1101, RR-			

Parties	Issue	Summary of issue raised	Applicant's response
1102, RR-1107, RR-1108, RR-1111, RR-1112, RR-1113, RR-1118, RR-1121, RR-1122, RR-1123, RR-1125, RR-1128, RR-1131, RR-1132, RR-1136, RR-1139, RR-1145, RR-1148, RR-1150, RR-1157, RR-1160, RR-1162, RR-1164, RR-1166, RR-1167, RR-1168, RR-1182, RR-1184, RR-1186, RR-1188, RR-1193, RR-1195, RR-1196, RR-1202, RR-1204, RR-1206, RR-1209, RR-1211, RR-1218, RR-1221, RR-1222, RR-1224, RR-1236, RR-1238, RR-1251, RR-1256, RR-1266, RR-1267, RR-			

Parties	Issue	Summary of issue raised	Applicant's response
1270, RR-1273, RR-1276, RR-1283, RR-1285, RR-1287, RR-1288, RR-1298, RR-1299, RR-1304, RR-1317, RR-1321, RR-1322, RR-1325, RR-1338, RR-1339, RR-1350, RR-1352, RR-1353			
RR-0106, RR-0193, RR-0320, RR-474, RR-0483, RR-0512, RR-0513, RR-0522, RR-0554, RR-0557, RR-0560, RR-0561, RR-0574, RR-0604, RR-0615, RR-0628, RR-0841, RR-0828, RR-0925, RR-0927, RR-0959, RR-0969, RR-0995, RR-0999, RR-1013, RR-1044, RR-1045,	Landscape character	Loss of countryside will impact on negatively on the horseracing industry.	The Scheme has been designed to avoid land associated with the horse racing industry. It will therefore not result in the direct loss of any facility or land that is used by the horse racing industry. Sunnica West Site A is the closest part of the Scheme to areas used for training of racehorses. The Snailwell Gallops are located to the west of parcels W03 and W04, separated by dense belts of existing trees and proposed planting. An ecological mitigation area comprising native grassland is proposed where there is currently a gap in the existing vegetation. The Limekiln Gallops lie to the south of Sunnica West Site A, with parcels W05 and W07 separated from the Scheme by the busy A14 trunk road and Cambridge to Ipswich railway line. Further planting is proposed to mitigate the impacts on the setting and views from the Limekiln Gallops along the southern boundary of the Site, adjacent to the A14.

Parties	Issue	Summary of issue raised	Applicant's response
RR-1103, RR-1144,			The Applicant has engaged equine specialists regarding the potential impact of the Scheme on horses who consider that the Scheme would not prevent horses using or accessing equine facilities or moving safely around Newmarket as per existing arrangements.
RR-0009, RR-1057	Landscape character	Loss of amenity use and visual impact would be greater than the boundaries of the Scheme.	Effects on amenity use are contained within Chapter 13: Transport and Access of the Environmental Statement [APP-045]. Reference should also be made to related Figures 12-4 to 12-6 [APP-240 to APP-242] and Figures 13-1 to 13-3 [APP-243 to APP-245]. Chapter 10: Landscape and Visual Amenity [APP-042] reports adverse effects on users of a number of public rights of way during construction. However, these effects are not considered significant. With reference to the Scoping Opinion [APP-052], operational effects were scoped out of the assessment of transport and access effects. The visual effects of the Scheme have been studied in detail within Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042], including effects which extend beyond the Order limits. The assessment identifies limited significant adverse visual effects during the construction phase, operational and decommissioning phases. These mostly relate to users of the local road and public right of way network within and in proximity to the Scheme, with a small number of residents also affected. The only residual significant effects identified in year 15 of operation relate to recreational users and users of the training grounds at the Limekilns (38). These residual effects would be Moderate Adverse.
RR-0035, RR-0334, RR-0391, RR-0823, RR-0826, RR-0882, RR-1041, RR-1107	Landscape character	The Scheme is not in keeping with the established landscape character, which does not lend itself to large-scale solar.	A detailed study of the landscape character has been carried out to understand the likely effects on the landscape and to inform the design of mitigation and enhancement measures. The landscape is dominated by large fields of intensive arable production, interspersed with paddocks and fields of pasture, which tend to be small around settlement edges. Other uses such as pig farming, quarrying and small industrial estates are also located in the area. The established landscape character of the area is, apart from small areas such as Chippenham Fen, one of extensive human intervention over a long period.

Parties	Issue	Summary of issue raised	Applicant's response
			Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] acknowledges that there will be some adverse effects on the character of the landscape locally, which would remain significant at year 15 of operation. The Scheme has been designed with built elements to be laid out within the existing natural features and landscape pattern of fields and landscape framework of hedgerows, shelter belts and woodland to maximise landscape integration. Planting is proposed to strengthen this landscape framework with extensive grassland swards extending beneath panels and across ecological mitigation areas.
RR-0035, RR-0896	Landscape character	Cable installation will negatively impact the historical landscape.	Impacts on cultural heritage caused by the construction of the cable are detailed in the Cultural Heritage Assessment in Chapter 7: Cultural Heritage of the Environmental Statement [APP-039] . Once the cable has been installed there will be nothing visible above the surface, and consequently there are no impacts on the historic character of the area.
RR-0009	Landscape features	Information presented about field margins is incorrect.	With reference to Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] , areas where field margins have been recorded reflect their presence at the time of survey. The Applicant recognises that we are working in a changing environment and parts of the Phase 1 Habitat survey [APP-187] have been kept up to date since 2018. The Applicant considers the baseline presented within Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] , to be an accurate account of baseline conditions at the time of the assessment. Updated surveys will be reported in a technical note which will be shared with all stakeholders through submission to PINS during the Examination.
RR-0319	Landscaping	Landscaping as a result of Sunnica would be a benefit.	Extensive planting is proposed as part of the mitigation for the Scheme against a range of effects, particularly relating to landscape, views of the landscape and ecology. This mitigation is illustrated on Figures 10-14a to 10-14f [APP-209 to APP-214] of the Environmental Statement and is described in the Landscape and Ecology Management Plan [APP-108] . This document sets out the measures proposed to mitigate the effects of the Scheme on landscape and biodiversity features, and to enhance the biodiversity, landscape and Green Infrastructure value of the Order limits, to secure compliance with relevant national and local planning policies. The vision is stated as delivering a new

Parties	Issue	Summary of issue raised	Applicant's response
			network of environmental features which will also deliver a range of ecosystem services, incorporating biodiversity, heritage, landscape and access by enhancing and strengthening the landscape framework and Green Infrastructure within the Order limits. This includes setting aside 30% (approximately 300 ha) of the Order limits for creation of biodiverse habitats, contributing to landscape-scale benefits for pollinators through increased habitat provision and connectivity. Existing hedgerows and trees will be allowed to grow tall and wide to provide maximum benefits for biodiversity and this natural regeneration will encourage a mosaic of successional habitats, forming broad habitat corridors throughout the Scheme. Areas around the periphery of panels will be managed and enhanced for arable flora which will benefit a range of wildlife, including terrestrial invertebrates, amphibians, reptiles; small mammals (such as voles), and both foraging and ground-nesting birds. Leaving rough areas of grassland margins, which will benefit small mammals, will also provide foraging habitat for Barn Owl <i>Tyto alba</i>.
RR-0219, RR-0228, RR-0322, RR-0334, RR-0573	Mitigation	Insufficient screening is provided through the Scheme.	The visual effects of the Scheme have been studied in detail within Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042]. The assessment identifies significant adverse visual effects during the construction phase, operational and decommissioning phases. These mostly relate to users of the local road and public right of way network within and in proximity to the Scheme, with a small number of residents also affected. A comprehensive suite of planting is proposed to assist in integrating the Scheme into the landscape and to provide screening for sensitive views, which is illustrated on Figures 10-14a to 10-14f [APP-209 to APP-214] and described in the Landscape and Ecology Management Plan [APP-108]. This is sufficient to reduce visual effects to not significant by year 15 of operation, with the exception of recreational users and users of the training grounds at the Limekilns (Viewpoint 38).

Parties	Issue	Summary of issue raised	Applicant's response
RR-0100, RR-0105, RR-0117, RR-0154, RR-0189, RR-0241, RR-0254, RR-0362, RR-0550, RR-0578, RR-0822, RR-0827, RR-0835, RR-0871, RR-1040, RR-1125, RR-1240, RR-1301	Mitigation	Screening will take years to become established.	The Landscape and Ecology Management Plan [APP-108] explains that planting proposed as part of the Scheme would comprise native species which are prevalent in the local landscape. These are species which are known to establish well in the soils found in the area. The majority of planting stock will be forestry transplants of 40-60cm and 60-80cm in height. Smaller plants tend to establish better in the field because lifting them from the nursery at this stage in their development retains more of the root system and they can therefore more readily adapt to the conditions of the site. Feathered trees of 150-175cm and 200-250cm will also be planted in hedgerows, depending on the species specified. Trees are a characteristic feature of hedgerows and it is necessary to specify taller plants so that they are not outcompeted by faster growing shrub species in the early stages of establishment or damaged when hedgerows are cut. It is correct that the proposed planting will take some years to establish and this is acknowledged within the landscape and visual impact assessment presented in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042]. Paragraph 10.3.11 (d) states the assumption that <i>"the tree planting would have grown by an assumed 3m in height (equating to 20 centimetres per year) to range between 4m and 6.5m in height. New and existing hedgerows would be managed and maintained between 2m and 3m in height."</i>
RR-0228, RR-0270, RR-0523, RR-0825, RR-0827, RR-0837, RR-0842, RR-0982, RR-1206	Mitigation	No amount of mitigation can significantly reduce the harm that the Scheme will cause.	The landscape and visual effects of the Scheme have been studied in detail within Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042]. This assessment has informed the iterative design of the Scheme and demonstrates how significant effects have been avoided or reduced through embedded mitigation. Paragraph 4.5.1 of the National Policy Statement for Energy (EN-1) states that <i>"applying "good design" to energy projects should produce sustainable infrastructure sensitive to place, efficient in the use of natural resources and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible. It is acknowledged, however</i>

Parties	Issue	Summary of issue raised	Applicant's response
			<i>that the nature of much energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area."</i> As set out in the Design and Access Statement (DAS) [APP-264], the design of the Scheme has evolved over a six-year period from the initial feasibility study in 2015 to the Application submission in 2021. The design of the Scheme has been informed by consultation responses, baseline studies and assessment of effects set out in the Environmental Statement, to address negative impacts and maximise opportunities for landscape integration. The vision and objectives for the Scheme were further developed through 2019 and are set out in paragraphs 3.5.5 and 3.5.7 of the DAS [APP-264]. New and enhanced Green Infrastructure is a key feature of the Scheme, providing an attractive and biodiverse landscape framework within which the built elements of the Scheme will be integrated. The design also includes substantial offsets of proposed built elements from field boundaries to maximise the effectiveness of existing vegetation in providing visual screening, as illustrated in Figures 8 to 13 contained within the Landscape and Ecology Management Plan [APP-108]. As the Landscape and Visual Impact Assessment demonstrates [APP-042], proposed planting and careful management of existing vegetation within and on the boundaries of the Order limits will enclose and screen these built elements in most locations.
RR-0982	Mitigation	The mitigation proposals fail to take account of the seasonal variation in the effectiveness of the planting.	As set out in paragraph 10.1.2 of Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042], the landscape and visual impact assessment (LVIA) has been undertaken for the construction (winter), year 1 of opening (winter), year 15 post opening (summer), and decommissioning (winter) phases of the Scheme. This is a common approach for LVIA, to draw distinctions between temporary and long-term effects and to demonstrate the effectiveness of planting in mitigating the effects of the Scheme. The Landscape and Ecology Management Plan [APP-108] explains that planting proposed as part of the Scheme would comprise native species which are prevalent in the local landscape. This would include a mixture of deciduous

Parties	Issue	Summary of issue raised	Applicant's response
			trees and shrubs, and evergreen trees including the locally characteristic Scots Pine (<i>Pinus sylvestris</i>). Existing hedgerows and other boundary vegetation would be retained and enhanced to maximise their density and screening function in sensitive views in all seasons, whilst retaining the characteristic features of pine lines.
RR-0324, RR-0972	Mitigation	Mitigation proposals such as trees will have a negative landscape impact in and of themselves.	Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] does not identify any adverse (negative) landscape impacts relating to the tree planting proposed as part of the Scheme. Trees have been identified as a common feature of the landscape in Appendix 10B: Tree Constraints Report of the Environmental Statement [APP-101] . The Scheme offers the opportunity to enhance existing vegetation patterns by increasing tree cover, reinforcing field boundaries and improving the age structure of trees in the landscape.
RR-0783	Mitigation	The Applicant has made every effort to screen the Scheme.	This comment is noted.
RR-0106	Mitigation	The Applicant has taken a 'one size fits all' approach to mitigation.	The Landscape and Ecology Management Plan (LEMP) [APP-108] explains that the planting proposed as part of the Scheme has been designed to reflect the existing landscape character as it varies across the site and its wider context. It offers the opportunity to increase Green Infrastructure across the Order limits, reflecting valued landscape characteristics which would aid in integrating the Scheme within the landscape. The LEMP describes how the design has been developed for each parcel across each site, to address specific constraints and opportunities and to embed mitigation into the Scheme. This does not reflect a one size fits all approach. The design principles and Green Infrastructure proposals set out in the LEMP have been defined with reference to the detailed landscape character assessment undertaken as part of the Landscape and Visual Impact Assessment for the Scheme. This is summarised in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] and set out in detailed in Appendix 10D: Published Landscape Character Extracts [APP-103] and Appendix 10E: Local Landscape Character Areas [APP-104].

Parties	Issue	Summary of issue raised	Applicant's response
RR-0573	Mitigation	Planting needs to be carried out as soon as possible if the scheme is built.	It is the intention of the Applicant to commence planting of proposed mitigation as early as possible within the two-year construction period. Planting of hedgerows and trees will be carried out during the winter, between the beginning of November and the end of March. It is expected that some planting will be carried out during the first planting season during construction, and this will be dependent on the availability of land where construction has completed, and soils have been replaced. Grassland will be sown during the spring or late summer, depending on the type of grassland proposed. The exact timing and phasing of planting will be determined at the detailed design stage pursuant to approval of a detailed LEMP. Further detail is provided in the Landscape and Ecology Management Plan [APP-108] and the Framework Construction Environmental Management Plan [APP-123]. Paragraphs 5.9.16 and 5.10.18 of NPS EN-1 and Draft NPS EN-1, respectively, set out that in considering the landscape impact of the Scheme, the decision maker should take account of whether any adverse impact is temporary and/or is capable of being reversed in a reasonable timescale. This detail is provided in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042].
RR-0573	Mitigation	There is an existing planting belt between the application site and the Gallops, however it is essential that this planting belt is infilled in parts to ensure there is no view through from the Gallops into the site.	The potential effects of glint and glare from the panels during operation has been assessed. Horse training facilities within 1km of the Order limits have been assessed as part of the Glint and Glare Assessment presented in Appendix 16A of the Environmental Statement [APP-121] and summarised in Chapter 16: Other Environmental Topics of the Environmental Statement [APP-048]. Sample receptor points were taken at the six identified facilities: a. Snailwell Gallops b. British Racing School c. Limekilns Gallops d. Godolphin Stables e. Bury Hill Gallops f. Long Hill Gallops

Parties	Issue	Summary of issue raised	Applicant's response
			The Glint and Glare Assessment concluded that reflections from the PV panels to the receptors (including pedestrians and riders using PRoW) during operation will either not be geometrically possible or will be sufficiently screened by the existing vegetation and landform, as well as the proposed planting for the Scheme illustrated on Figures 3-1 and 3-2 of the Environmental Statement [APP-135 and APP-136] and described in Appendix 10I: Landscape and Ecology Management Plan of the Environmental Statement [APP-108].
RR-0822, RR-0963, RR-0994, RR-1016, RR-1069	Mitigation	A comprehensive landscape plan with dense tree planting is an opportunity to extend the environmental benefit of this NSIP.	The landscape within the Order limits and the wider study area is the product of centuries of human influence of increasing intensity. Natural signatures, for example the characteristic pine lines of the Breckland, native grassland and scrub has been pushed to the margins. The Scheme creates opportunities to enhance and strengthen the landscape framework and Green Infrastructure of the area through new planting and management of existing vegetation. Landscape Masterplans presented in Figures 10-14a to 10-14f [APP-209 to APP-214] of the Environmental Statement illustrate the extensive tree and shrub planting proposed to mitigate the effects of the Scheme and to enhance the existing landscape framework. The Landscape and Ecology Management Plan [APP-108] sets out how the visions and objectives of the design will be achieved through a carefully planned period of establishment maintenance and long-term management. This will extend the benefits of the Scheme.
RR-0150, RR-0305, RR-0982	Substation	Concern about the visual impact of the grid connection at Burwell.	Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] sets out the likely significant effects on people's views relating to the grid connection at Burwell. A change to the Application brought forward by the Applicant has omitted proposed Option 1, related to an extension to the existing substation to the south. Visual effects relating to Option 2 (being retained at this time) are set out in detailed in Appendix 10H: Visual Effects of the Environmental Statement [APP-107]. Significant adverse effects are predicted for three visual receptor groups as a result of the construction of these elements. These effects relate to residents adjacent to the B1102 (Viewpoint 48), people travelling along Weir's Drove, Burwell (Viewpoint 53) and people walking adjacent to Burwell Lode (Viewpoint 54). All other visual effects are considered

Parties	Issue	Summary of issue raised	Applicant's response
			not significant. Effects on people travelling along Weir's Drove, Burwell (Viewpoint 53) would remain significant at year 1 of operation. These effects and all other effects are predicted to be not significant by year 15 of operation, when planting carried out as part of the Scheme would have established.

3.13 Heritage

3.13.1 77 individual comments were received in relation to heritage.

Applicant's responses to RRs relating to heritage

Parties	Issue	Summary of issue raised	Applicant's response
RR-0078	Archaeology	Scheme will have a negative impact on Roman remains.	The response is noted. A number of features of Roman date will be adversely impacted by the Scheme, as reported in the Cultural Heritage Assessment in Chapter 7: Cultural Heritage of the Environmental Statement [APP-039] . Archaeological mitigation will ensure that all impacted features will be excavated and recorded, whilst a number of land areas have been removed from the areas required for installation of panels and associated construction to allow the archaeological remains to be preserved <i>in situ</i> . This is detailed in Section 7.6 of Chapter 7: Cultural Heritage of the Environmental Statement [APP-039] . Full details will be included within the forthcoming Archaeological Mitigation Strategy.
RR-0078, RR-0094, RR-0187, RR-0237, RR-0304, RR-0539, RR-0578, RR-0775, RR-1057, RR-1206	Archaeology	The scheme will have a negative impact on archaeological remains.	The response is noted. A number of features will be adversely impacted by the Scheme, as reported in the Cultural Heritage Assessment in Chapter 7: Cultural Heritage of the Environmental Statement [APP-039] . Archaeological mitigation will ensure that all impacted features will be excavated and recorded, whilst a number of land areas have been removed from the areas required for installation of panels and associated construction to allow the archaeological remains to be preserved <i>in situ</i> . This is detailed in Section 7.6 of Chapter 7: Cultural Heritage of the Environmental Statement [APP-039] . Full details will be included within the forthcoming Archaeological Mitigation Strategy.

Parties	Issue	Summary of issue raised	Applicant's response
RR-0124, RR-0775	Archaeology	A significant archaeological record exists in and around Freckenham: the construction activity will damage this record, particularly in areas not surveyed.	The response is noted. A number of features are recorded to the north, north-east and east of Freckenham within Sunnica East Site A and East Site B, which will be adversely impacted by the Scheme. These impacts are reported in the Cultural Heritage Assessment in Chapter 7: Cultural Heritage of the Environmental Statement [APP-039] . The Scheme has been subject to appropriate assessment, including geophysical survey and evaluation trenching. A number of areas within this part of the Scheme have been set aside from development to ensure their survival. This is detailed in Section 7.6 of Chapter 7: Cultural Heritage of the Environmental Statement [APP-039] . Archaeological mitigation of other areas will ensure that all impacted features will be excavated and recorded. Full details will be included within the forthcoming Archaeological Mitigation Strategy.
RR-0982, RR-1128	Assessment	Heritage assets will be adversely affected significantly more severely than the Applicant's consultants are claiming.	The assessment of effects on heritage assets is presented in the Cultural Heritage Assessment in Chapter 7: Cultural Heritage of the Environmental Statement [APP-039] . This has been undertaken in accordance with current guidance and best practice. Historic England has confirmed its acceptance of the conclusions.
RR-0982	Assessment	The effect on the views from the hills arcing around to the south of Newmarket are not mentioned in the heritage assessment. This is a serious oversight.	The hills to the south of Newmarket were not considered within the heritage assessment as they are not considered to be of specific cultural heritage interest. They form a feature of the landscape and fall within the landscape assessment which is presented in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] .
RR-0944	Assessment	There has been no archaeological assessment of the U6006.	It is assumed that the U6006 refers to part of the Icknield Way, away from the formal trail, which passes some 2km to the east. The possible section of the route within the Order limits is a publicly accessible route. As shown on the Parameter Plan, Figure 3.1 [APP-135] , the route of U6006 is outside of the developable area and it will not be physically impacted, except for a small section where the proposed cable crosses this route. However, this small part of the U6006 route will revert to its original appearance following construction. Additional planting is proposed in places along the route to reinforce habitat connectivity and visual screening of solar panels in adjacent fields, as shown in the Landscape Masterplans in Figures 10-14a to 10-14f of the Environmental Statement [APP-209 to APP-214] .

Parties	Issue	Summary of issue raised	Applicant's response
			If required, archaeological mitigation will be included as part of the Detailed Archaeological Mitigation Strategy.
RR-1336	Designated assets	The Scheme will negatively impact on the setting of Grade 1 Listed St Margaret's Church in Chippenham.	The assessment of effects on heritage assets presented in the Cultural Heritage Assessment in Chapter 7: Cultural Heritage of the Environmental Statement [APP-039] considers the potential for effects on St Margaret's Church. It was established that the Scheme would not adversely affect the significance and prominence of the church.
RR-0982	Designated assets	The Scheme will impact negatively on Grade 2 listed Dalham Hall.	The study area for the heritage assessment is defined within the Cultural Heritage Assessment in Chapter 7: Cultural Heritage of the Environmental Statement [APP-039]. The study area was agreed with Historic England prior to undertaking the assessment. Those assets which fall outside the defined study area were only considered where there was the potential for an impact from the Scheme. Dalham Hall was specifically considered in response to a consultation response to the Scoping study. The hall lies 6km to the southeast of the Scheme and no relationship with the Scheme was identified.
RR-0944	Designated assets	Due to installation and traffic movements, there is concern for our historical/ listed buildings in Worlington including but not exclusively the war memorial and 59 The Street.	A Framework Construction Traffic Management Plan and Travel Plan [APP-118] has been prepared as part of the application. Construction traffic will be directed through Worlington to enable the construction of Sunnica East Site A. It was agreed pre-application with the local highway authority to escort HGVs associated with the development via a convoy marshal through the Newmarket Road/B1102 junction in Worlington. This will ensure that no damage is caused to the listed structures. Reference to this agreement is made within Chapter 13: Transport and Access of the Environmental Statement [APP-045] in Table 13-3 'Main Matters Raised during further Consultation'. This will be secured through the Construction Traffic Management Plan.
RR-0009, RR-0035, RR-0187, RR-0243, RR-	Heritage	The Scheme will have a negative impact on the heritage of the local	An assessment of potential impacts on the heritage of the local area is presented in the Cultural Heritage Assessment in Chapter 7: Cultural Heritage of

Parties	Issue	Summary of issue raised	Applicant's response
0442, RR-0474, RR-0496, RR-0505, RR-0510, RR-0524, RR-0545, RR-0605, RR-0607, RR-0612, RR-0634, RR-0690, RR-0733, RR-0764, RR-0825, RR-0883, RR-0902, RR-0944, RR-0969, RR-0982, RR-0995, RR-1125, RR-1128, RR-1129, RR-1132, RR-1144, RR-1162, RR-1205, RR-1206, RR-1213, RR-1282		area, including several villages of heritage interest.	the Environmental Statement [APP-039]. This includes an assessment of impact on the settlements within the local area. The assessment concluded that the Scheme would impact on the setting of the villages of Freckenham, Snailwell and Isleham. This impact has been reduced by enhanced planting mitigation, but there would remain a change within the landscape, taking into consideration the local rural character of the settlements. However, the level of the effect is assessed to be minor adverse and would last for the duration of the Scheme.
RR-0202, RR-0206, RR-0496, RR-0678, RR-0795, RR-1206, RR-1282	Heritage	The Scheme will negatively impact on a WW2 plane crash site.	The only recorded World War II crash site is near the former RAF Snailwell, where a plane crashed in 1942. The grid reference puts this site outside of the Order limits. While not in the archaeological record, there are reports of a post-War crash near Isleham, which may be partly within the Sunnica East site. The reports indicate the human remains and the aircraft remains have been removed. There may be some surviving debris, and the geophysical survey shows only limited evidence for metallic responses (refer to Appendix 7F of the Environmental Statement [APP-062 and APP-063]) in this area, and no evidence was found during the evaluation trenching.

Parties	Issue	Summary of issue raised	Applicant's response
AS-019	Heritage	The historic significant of the ancient section of the Icknield Way, which runs along Badlingham Lane has been overlooked as it is not part of the modern path.	It is assumed that the reference to Badlingham Lane refers to the U6006 which runs between Worlington and Elms Road, as shown on the Parameter Plan, Figure 3.1 [APP-135] . The U6006 is outside of the developable area of the Scheme and it will not be physically impacted, except for a small section where the proposed vehicle access and cable crosses this route. That small section of the U6006 route will revert to its original appearance following construction. If required, archaeological mitigation will be included as part of the Detailed Archaeological Mitigation Strategy. The formal Icknield Way trail passes some 2km to the east of the Scheme and therefore, there is no harm to the formal trail.
RR-0320, RR-0573, RR-0607, RR-0825, RR-0830, RR-0841, RR-1026	Heritage	The Scheme will have a negative impact on the heritage of Newmarket/local horse racing community.	The impact on Newmarket has been assessed in Chapter 7: Cultural Heritage of the Environmental Statement [APP-039] in relation to the conservation area. This takes into account the contribution that the horse racing industry makes to the heritage significance of the area, particularly the Limekilns. The assessment acknowledges that the Scheme will be visible in the middle ground of the view from the Limekilns, above the intervening vegetation and A14 tree screening as a result of its elevated position (in conjunction with Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042]). However, it is considered that this change will not impact on the ability to appreciate the significance of the heritage assets within Newmarket including the understanding of the importance of the racing industry to the evolution of the settlement and wider landscape.
RR-0270	Heritage	Concern at the impact that the Scheme would have on Chippenham Park.	The impact of the Scheme on the Grade II Registered Historic Park and Garden at Chippenham Park is presented in Chapter 7: Cultural Heritage of the Environmental Statement [APP-039] . This acknowledges that there will be an adverse impact on the significance of the asset through changes within its setting. This is assessed to be at the moderate adverse level which is a significant effect. The Heritage Harm Statement acknowledges that there will be harm caused, but at the less than substantial level (Planning Statement Appendix D [APP-263]).

Parties	Issue	Summary of issue raised	Applicant's response
			Mitigation through development offsets and landscaping has been proposed in recognition of the adverse impact caused. This mitigation is a result of a design evolution as set out in Chapter 4: Alternatives and Design Evolution of the Environmental Statement [APP-036] . Enhancement of existing hedgerows will provide additional screening for the Scheme, as appropriate. Planting has been carefully considered to enhance the Avenue, with localised vegetation removal and reinstating tree planting to better reveal the historic character of the feature.
RR-0568, RR-0895, RR-0912, RR-1150	Heritage	There are many listed buildings and heritage monuments adjacent to roads that are not designed to cope with HGVs.	A Framework Construction Traffic Management Plan and Travel Plan [APP-118] has been prepared as part of the application. Construction traffic routes have been agreed with the local highway authority, which will be secured through the Construction Traffic Management Plan. HGV routes have been subject to swept path analysis to demonstrate that movements can be accommodated within the highway, and therefore damage to historic and domestic buildings is extremely unlikely. Internal haul routes will be kept well-maintained and free of imperfections that may cause perceptible levels of vibration to be generated. Effects during decommissioning will be similar or less than during construction and will be mitigated in the same manner as construction phase effects. There will be very limited numbers of HGVs required to access the site during the operational phase of the project, and therefore operational HGV traffic will not be an issue in this respect.
RR-0211, AS-019	Heritage	The removal of ancient hedgerows and replacement with fencing will destroy the landscape character and historic integrity of ancient routes.	The Landscape and Ecology Management Plan [APP-108] describes how existing hedgerows will be retained and enhanced within the Scheme. Cross sections are provided in this document to illustrate how fencing and other elements of the Scheme would be located in the context of retained vegetation, including hedgerows, and proposed planting. The Landscape Masterplans presented in Figures 10-14a to 10-14f [APP-209 to APP-214] of the Environmental Statement show how these mitigation measures would relate spatially and integrate with existing landscape patterns, including hedgerows lining field boundaries, roads between settlements and public rights of way.
RR-1043	Mitigation	The archaeological mitigation strategy is vague.	Mitigation is detailed in paragraphs 7.6.6 to 7.6.9 and in Section 7.8 of Chapter 7: Cultural Heritage of the Environmental Statement [APP-039] . However, as noted in paragraph 7.8.4 " <i>Outstanding results, from evaluation trenching that</i>

Parties	Issue	Summary of issue raised	Applicant's response
			<i>was delayed due to land access and cropping schedule constraints, will be submitted prior to the Examination stage of this Application.</i> " This information was required before a more specific mitigation strategy could be completed and will be submitted once complete. A Detailed Archaeological Mitigation Strategy will be prepared for discussion with the county councils, and submitted during the pre-Examination stage, or during the early part of the Examination, and interested parties will have an opportunity to comment on the strategy as part of the Examination process. The Detailed Archaeological Mitigation Strategy will be finalised in accordance with a joint County Council Brief.
RR-1102, RR-1344, AS-019	Non-designated assets	The Scheme should be redesigned to avoid harm to the Icknield Way.	There is no harm to the Icknield Way. The formal trail passes some 2km to the east. The possible section of the route within the Order limits is a publicly accessible route. As shown on the Parameter Plan, Figure 3.1 [APP-135], this section of the Icknield Way (also referred to elsewhere in this document and in relevant representations from other interested parties as the U6006) is outside of the developable area and it will not be physically impacted, except for a small section where the proposed cable crosses this route. However, this part of the Icknield Way will revert to its original appearance following construction. If required, archaeological mitigation will be included as part of the Detailed Archaeological Mitigation Strategy. Although Rescue, in its relevant representation, has indicated that "<i>the identification of significant landscape features running parallel to the lane reported during archaeological evaluation for the Solar Farm appears to confirm that this is a long-standing landscape feature</i>" the only evidence found during the geophysical survey [APP-062] was of post-Enclosure agricultural features, and no archaeological features were recorded during the evaluation or excavation (refer to Appendix 7H of the Environmental Statement [APP-075]). Furthermore, Rescue's request to redesign the Scheme so "<i>an alternative option for the cable run, along the field edges</i>" is irrelevant, as the cable run is already located with the adjacent field.

3.14 Transport and Access

3.14.1 639 individual comments were received in relation to transport and access.

Applicant's responses to RRs relating to transport and access

Parties	Issue	Summary of issue raised	Applicant's response
RR-0274, RR-0516, RR-0519, RR-0621, RR-0863, RR-0896	Air quality	Construction traffic will have negative air quality impacts.	A full Air Quality Assessment of the construction traffic flows has been undertaken and is reported in Chapter 14: Air Quality of the Environmental Statement [APP-046] . This assessment has shown that there are no significant impacts predicted during construction as a result of the Scheme.
RR-0967, RR-1068	Access	Concern about proximity of Scheme access point to the Royal Worlington Golf Club.	Following the consultation feedback, the Applicant has removed the construction site access from Golf Links Road which removes the requirement for HGVs to travel along Golf Links Road during the construction period.
RR-0096, RR-0208, RR-0252, RR-0261, RR-0291, RR-0356, RR-0859	Access	Golf Links Road should not be used for access.	Following the consultation feedback, the Applicant has removed the construction site access from Golf Links Road which removes the requirement for HGVs to travel along Golf Links Road during the construction period.
RR-0006, RR-0026, RR-0886	Access	There are not enough access points for emergency evacuations.	The Applicant respectfully disagrees. In total there are 35 site accesses with various internal routes provided to transport staff and equipment around the site which will also be used for emergency evacuation. In addition, each BESS site has two dedicated access points which provides options for access in case of an emergency at one of these locations.
RR-0009	Access	Insufficient detail has been provided regarding access points.	The Applicant respectfully disagrees. The Framework Construction Traffic Management Plan and Travel Plan [APP-118] provides details on the consideration given to site accesses including swept path analysis (vehicle tracking) of a 16.5m articulated lorry and a 22.6m long crane where required, indicative junction layouts and visibility splay requirements and the potential impact on hedgerow/landscaping. The Traffic Regulation Measures Plans – Temporary Road Closures [APP-009 to APP-011] , Traffic Regulation Measures Plans – Temporary Measures [APP-012 to APP-013] and the Access and Rights of Way Plans [AS-005] identify the proposed access strategy to provide safe entry and egress to the site accesses in relation to temporary speed limit reductions and temporary traffic signals.

Parties	Issue	Summary of issue raised	Applicant's response
RR-0539	Access	Access routes will subject the area to wind erosion and air turbulence.	Perennial plant cover provided by the grass sward will minimise the exposure of bare soil vulnerable to wind erosion. Access routes will be surfaced with gravel so will not be vulnerable to wind erosion.
RR-0568, RR-1029	Access	The access modifications will harm the character of the area.	The temporary construction site accesses have been designed to minimise the impact on the local area by reducing the impact of the amount of vegetation to be removal or trimmed to provide the site access and visibility splays. Table B-9 in Appendix B of the Design and Access Statement [APP-264] provides a summary of the project stage (i.e., construction, operational or decommissioning) that each access will be used. Where accesses are not required beyond the construction stage, they will be re-instated to their previous condition.
RR-0252, RR-0441, RR-1043, RR-1128	Assessment	Transport impacts have not been adequately assessed.	The Applicant respectfully disagrees. The transport impacts for the construction period are assessed in Chapter 13: Transport and Access [APP-045] and Appendix 13B: Transport Assessment [APP-117] of the Environmental Statement. The traffic assessments have been undertaken by specialists in line with relevant guidance and appropriate best practice.
AS-013	Assessment	Information to determine the effect of the Scheme traffic and transport management measures and works, and its impact on East of England Ambulance Service Trust's (EEAST's) operational resources, capacity and efficiency is currently absent from the DCO documentation. Similar information on Abnormal Indivisible Loads is also absent. The impact of Scheme traffic and transport effects on EEAST's operational resources, capacity and efficiency therefore needs to be presented and assessed, with appropriate mitigation and management measures proposed, secured and	The transport impacts for the construction period are assessed in Chapter 13: Transport and Access [APP-045] of the Environmental Statement. This has shown that with the implementation of embedded mitigation measures there will be no significant effects in relation to driver delay as a result of an increase in traffic on the surrounding network or accidents and safety as a result of the Scheme. The proposed embedded mitigation is set out in the Framework Construction Traffic Management Plan and Travel Plan [APP-118], Traffic Regulation Measures Plans – Temporary Road Closures [APP-009 to APP-011] and Traffic Regulation Measures Plans – Temporary Measures [APP-012 to APP-013]. These plans identify where temporary road closures, temporary speed limit reductions and temporary traffic signals are required. The impact of the Abnormal Indivisible Loads (AILs) has been considered and set out in the Framework Construction Traffic Management Plan and Travel Plan [(APP-118)]. This includes undertaking a route review from the Strategic Road Network to the required site accesses across the Scheme to identify relevant routes

Parties	Issue	Summary of issue raised	Applicant's response
		implemented within a Section 106 planning obligation or Deed of Obligation, as part of any Development Consent Order approval.	which can accommodate the AILs. In addition, the route review identifies where street furniture or signage is required to be temporarily relocated to accommodate the AILs. Traffic mitigation and management measures are set out in the documents referenced above and would be secured via the DCO itself. No mitigation measures that would need to be secured by a Section 106 planning obligation have been identified through the comprehensive impact assessment of potential traffic and transport effects as set out in Chapter 13: Transport and Access [APP-045] of the Environmental Statement at this stage.
AS-013	Emergency Services	Information to determine the effect of the Scheme's abnormal indivisible loads (AIL) along with highway related disruption and delay and its impact on EEAST's operational resources, capability and efficiency is currently absent from the DCO documentation. The impact of AIL traffic and transport effects on EEAST's operational resources, capacity and efficiency therefore needs to be presented and assessed, with appropriate mitigation and management measures proposed, secured and implemented within a Section 106 planning obligation or Deed of Obligation, as part of any Development Consent Order approval.	The proposed mitigation is set out in the Framework Construction Traffic Management Plan and Travel Plan [APP-118], Traffic Regulation Measures Plans – Temporary Road Closures [APP-009 to APP-011] and Traffic Regulation Measures Plans – Temporary Measures [APP-012 to APP-013]. These plans identify where temporary road closures, temporary speed limit reductions and temporary traffic signals are required. The impact of the Abnormal Indivisible Loads (AILs) has been considered and set out in the Framework Construction Traffic Management Plan and Travel Plan [APP-118]. This includes undertaking a route review from the Strategic Road Network to the required site accesses across the Scheme to identify relevant routes which can accommodate the AILs/cranes. In addition, the route review identifies where street furniture or signage is required to be temporarily relocated to accommodate the AILs. Traffic mitigation and management measures are set out in the documents referenced above and would be secured via the DCO itself. No mitigation measures that would need to be secured by a Section 106 planning obligation have been identified through the comprehensive impact assessment of potential traffic and transport effects as set out in Chapter 13: Transport and Access [APP-045] of the Environmental Statement.

Parties	Issue	Summary of issue raised	Applicant's response
RR-0567	EV Charging	The Scheme should provide more electric vehicle charging infrastructure.	At this stage, no EV charging points are proposed as part of the Scheme. However, EV points could be technically feasible in the future subject to further technical work.
RR-0974	Impact on infrastructure	Mud and soil will be brought onto the roads from construction traffic.	Wheel washing facilities will be provided at the site accesses to prevent mud being trafficked onto the highway as outlined in the Framework Construction Traffic Management Plan and Travel Plan [APP-118] .
RR-0586, RR-0588	Impact on infrastructure	Concern that construction traffic will cause damage to PROW.	The Framework Construction Traffic Management Plan and Travel Plan [APP-118] identifies the eight PROWs which are required to be temporarily closed during the construction period (for a maximum of 3 weeks). Where construction vehicles are required to cross PROWs during construction, the Applicant will undertake PROW conditional surveys before, during and after the construction period to identify any impacts which are a result of the Scheme that need to be rectified. This will be documented in the next iteration of the Framework Construction Traffic Management Plan and Travel Plan [APP-118].
RR-0463	Impact on infrastructure	All infrastructure used during the construction (e.g., roads and verges) must be made good to return them to their original, or better, state.	The Applicant will undertake highway conditional surveys before, during and after the construction period to identify any impacts which are a result of the development that need to be rectified. The exact roads will be agreed with the local highway authorities in advance of construction as identified in the Framework Construction Traffic Management Plan and Travel Plan [APP-118] .
RR-0703	Information	Further details as to the programming of the project are required as well as proper details regarding delivery routes for HGVs and employees are required.	The Applicant considers that it has provided sufficient detail within the Application documents to enable informed comment on the construction, operation and decommissioning phases of the Scheme. Details relating to the number of employees expected on site during construction is provided in the Framework Construction Environmental Management Plan [APP-123] and during operations is provided in the Framework Operation Environmental Management Plan [APP-126] . Details of HGV routes during construction are provided within the Framework Construction Traffic Management Plan and Travel Plan [APP-118] . Figures are provided within the Transport Assessment [APP-117] which outline the forecast peak daily HGV movements (single direction) and average daily HGV movements (single direction) along the local roads to the Sunnica East and Sunnica West site accesses. Also provided in the Transport Assessment [APP-117] is a summary of

Parties	Issue	Summary of issue raised	Applicant's response
			the forecast daily HGVs (single direction) required throughout the construction programme to Sunnica East, Sunnica West, Burwell National Grid Substation and the Grid Connection.
RR-1017	LGC Campus	No assessment of the impacts of using the narrow access road through the LGC Campus is presented as part of the DCO or explanation as to why alternative routes have not been chosen.	A site access review was undertaken for the proposed access locations along Grid Connection Route A and B, which is documented within the Framework Construction Traffic Management Plan and Travel Plan [APP-118] . A summary is provided in Section 5.3 and further detail is provided within Annex C of the report. This showed that access through this junction is achievable for a 16.5m Articulated Lorry without any requirements for improvement works. Various options were discussed with HPUT in terms of accessing this section of Grid Connection Route B; however, none were considered feasible and discussions are ongoing with HPUT regarding the use of this access. Appendix 11D of the Environmental Statement [APP-112] contains information on construction traffic noise modelling. Table 1-5 indicates that, for the Sunnica West cable route, there will be a maximum of 23 HGVs during a peak day. Based on the noise contour plot of Figure 11-3 of the Environmental Statement [APP-235] , average noise levels will be less than 50 dB LAeq,T along the access route. This is below the level that may result in temporary disturbance.
RR-0503, RR-0902	Mitigation	Inadequate road improvements are proposed to support the Scheme.	The Applicant respectfully disagrees. The road improvements to Elms Road and La Hogue Road are set out in the Framework Construction Traffic Management Plan and Travel Plan [APP-118] in relation to carriageway widening. However, consultation is on-going with the LHA regarding the minimum width to widen the carriageway. Information regarding mitigation is provided in the Framework Construction Traffic Management Plan and Travel Plan [APP-118] , Traffic Regulation Measures Plans – Temporary Road Closures [APP-009 to APP-011] and Traffic Regulation Measures Plans – Temporary Measures [APP-012 to APP-013] . The Applicant will undertake highway conditional surveys before, during and after the construction to identify any impacts which are a result of the development that need to be remediated.
RR-0944	Parking	Staff parking provision is inadequate.	The Applicant respectfully disagrees. Parking levels are based on the forecast level of staff parking demand at the peak of the construction period. To reduce the impact of construction staff on the local highway network, a parking strategy was developed which included two main staff car parks located at Sunnica East Site B on Elms Road and Sunnica West Site A on La Hogue Road in close proximity to the

Parties	Issue	Summary of issue raised	Applicant's response
			A11. The parking strategy reduces the requirement for staff to travel on the local highway network. The two car parks have the required number of parking spaces to accommodate the peak forecast number of construction staff vehicles. The Applicant will monitor the usage of the car parks through the construction period, and the Community Liaison Officer will be the point of contact for local communities if required.
RR-0228, RR-0278, RR-0532, RR-0895, RR-1125	Permissive paths	The permissive paths proposed are not sufficient.	The Applicant has assessed the opportunities that are available and considers that best use of these opportunities has been made in the Scheme design. The permissive paths proposed are: a. A new permissive path adjacent to Beck Road at Sunnica East Site A increasing the recreational value across Sunnica East Site A and providing increased connectivity between Freckenham and the southern edge of Isleham; b. A new permissive path across Sunnica East Site B, to provide access from the existing unclassified road (U6006) across the north of Sunnica East Site B to connect with Golf Links Road; and c. A new permissive path adjacent to Elms Road and around the perimeter of Sunnica East Site B, which will connect U6006 with PRow W-257/003/0 which runs to Red Lodge.
RR-0009, RR-0024, RR-0100, RR-0106, RR-0126, RR-0135, RR-0142, RR-0194, RR-0195, RR-0228, RR-0237, RR-0241, RR-0242, RR-0274, RR-0278, RR-0291, RR-0294, RR-0439, RR-0442, RR-	PROWS	The Scheme will reduce access to footpaths and tracks.	It is acknowledged in Chapter 13: Transport and Access of the Environmental Statement [APP-045] that eight PRowS are required to be temporarily closed during the construction period. These PRowS will be closed for up to three weeks which is considered to be the worst-case scenario. The PRowS are not expected to be all closed at the same time. In addition, three permissive routes are being proposed as part of the scheme post-construction which is outlined in the Transport Assessment [APP-117].

Parties	Issue	Summary of issue raised	Applicant's response
0443, RR-0444, RR-0446, RR-0459, RR-0529, RR-0536, RR-0539, RR-0545, RR-0548, RR-0564, RR-0565, RR-0575, RR-0602, RR-0614, RR-0616, RR-0621, RR-0637, RR-0681, RR-0684, RR-0692, RR-0709, RR-0726, RR-0736, RR-0744, RR-0751, RR-0775, RR-0808, RR-0835, RR-0843, RR-0889, RR-0895, RR-0902, RR-0936, RR-0944, RR-0973, RR-1007, RR-1016, RR-1028, RR-1035, RR-1037, RR-1069, RR-1079, RR-1098, RR-1112, RR-1119, RR-1125, RR-1128, RR-1148, RR-			

Parties	Issue	Summary of issue raised	Applicant's response
1152, RR-1158, RR-1186, RR-1192, RR-1206, RR-1209, RR-1212, RR-1216, RR-1222, RR-1318, RR-1321, RR-1339			
RR-0278	PROWs	Informal arrangements are insufficient given the Scheme's operating life and the Scheme should look to provide dedicated routes for adoption by the local authorities.	The Applicant cannot provide for the routes to be permanent as post decommissioning the land will be returned to its current landowners and will no longer form 'the Scheme'. It will then be up to the landowners to determine what steps they then wish to take in respect of the path.
RR-0278	PROWs	Sunnica is already aware of the different public rights of way that it could provide but is yet to seriously engage with the suggestions.	The Applicant has assessed the opportunities that are available and considers that best use of these opportunities has been made in the Scheme design. The permissive paths proposed are: a. A new permissive path adjacent to Beck Road at Sunnica East Site A increasing the recreational value across Sunnica East Site A and providing increased connectivity between Freckenham and the southern edge of Isleham; b. A new permissive path across Sunnica East Site B, to provide access from the existing unclassified road (U6006) across the north of Sunnica East Site B to connect with Golf Links Road; and c. A new permissive path adjacent to Elms Road and around the perimeter of Sunnica East Site B, which will connect U6006 with PRoW W-257/003/0 which runs to Red Lodge.
RR-0012	Public transport	There is no meaningful public transport locally.	It is acknowledged in the Transport Assessment [APP-117] that the bus and rail timetables do not offer a practical travel option for construction staff given the working hours of 0700-1900. Therefore, the Transport Assessment [APP-117] does not rely on the use of existing public transport. When more details are known regarding staff home locations, the feasibility of providing mini-bus services to serve

Parties	Issue	Summary of issue raised	Applicant's response
			staff clusters or local rail stations will be investigated and implemented if feasible, as set out in the Framework Construction Traffic Management Plan and Travel Plan [APP-118] .
RR-0012, RR-0032, RR-0082, RR-0107, RR-0127, RR-0145, RR-0159, RR-0200, RR-0203, RR-0228, RR-0263, RR-0267, RR-0286, RR-0288, RR-0293, RR-0295, RR-0507, RR-0510, RR-0542, RR-0548, RR-0550, RR-0584, RR-0586, RR-0587, RR-0588, RR-0604, RR-0672, RR-0792, RR-0886, RR-0889, RR-0891, RR-0901, RR-0907, RR-0912, RR-0972, RR-0983, RR-1109, RR-1112, RR-1143, RR-1238, RR-1284	Road network	The local road network cannot support the increase in traffic involved in the Scheme.	The impact on the highway network is outlined in Chapter 13: Transport and Access of the Environmental Statement [APP-045] and the Transport Assessment [APP-117] . Mitigation is outlined in the Framework Construction Traffic Management Plan and Travel Plan [APP-118] , Traffic Regulation Measures Plans – Temporary Road Closures [APP-009 to APP-011] and Traffic Regulation Measures Plans – Temporary Measures [APP-012 to APP-013] . Construction staff are to arrive on-site before 0700 and depart the site after 1900, i.e., outside of the network peak hours. Therefore, the Applicant respectfully disagrees.

Parties	Issue	Summary of issue raised	Applicant's response
RR-0032, RR-0072, RR-0119, RR-0132, RR-0233, RR-0226, RR-0228, RR-0259, RR-0304, RR-0334, RR-0433, RR-0439, RR-0463, RR-0473, RR-0493, RR-0506, RR-0516, RR-0518, RR-0519, RR-0539, RR-0548, RR-0596, RR-0615, RR-0617, RR-0686, RR-0700, RR-0775, RR-0835, RR-0896, RR-0863, RR-0871, RR-0988, RR-1031, RR-1119, RR-1235, RR-1312, RR-1316, RR-1349	Road network	The Scheme will worsen the physical condition of the local road network. The cost of this will be met by local people.	The Applicant will undertake highway condition surveys before, during and after the construction to identify any impacts on the physical condition of the local road network (refer to paragraph 7.2.14 of the Framework Construction Traffic Management Plan and Travel Plan [APP-118]). Any damage to the local roads that has clearly occurred as a result of the construction of the Scheme will be repaired by the Contractor in an appropriate timeframe as agreed with the Local Highway Authorities.
RR-0822, RR-0944, RR-1115	Road network	There are no adequate crossing points on the road through Worlington.	This statement / concern is not as a result of the proposed Scheme and therefore does not fall within the remit of the Application. It was agreed pre-application with the local highway authority to escorting HGVs associated with the development via a convoy marshal through the Newmarket Road/B1102 junction in Worlington. This has been agreed to mitigate effects of HGV movements within Worlington. Reference to this agreement is made within

Parties	Issue	Summary of issue raised	Applicant's response
			Chapter 13: Transport and Access of the Environmental Statement [APP-045] in Table 13-3 'Main Matters Raised during further Consultation'.
RR-0356, RR-0736, RR-0859	Road network	The A11 junction is unsuitable for lorries without a longer slip road.	It is unclear which slip-road(s) are in question, however, HGVs currently use the A11 and its slip-roads. The proposed HGV routes are outlined in the Transport Assessment [APP-117] . National Highways, as the Highways Authority for the Strategic Road Network (SRN), has been consulted on the scheme and has not raised an objection to the use of A11 junctions.
RR-0895	Road network	In many places, HGVs will not be able to pass without taking up the whole road.	It is unclear which specific roads or locations are in question. The Application seeks the necessary consents to widen roads, where it is considered by the Applicant to be required to facilitate the construction of the Scheme. Further discussions are being held with the relevant local highway authorities in relation to the widening of existing roads.
RR-0822	Road network	The Newmarket Road/B1102 junction is dangerous with poor visibility - using this route will pose a substantial risk to road users.	It is noted that this response is regarding the Newmarket Road/B1102 junction in Worlington, and not the Newmarket Road/B1102 junction in Burwell. The most recent five years (60 months) of Personal Injury Collision data was obtained from SCC with analysis reported in Chapter 13: Transport and Access of the Environmental Statement [APP-045]. Based on the information available, the PIC data provided did not show a particular cluster or pattern of collisions. In relation to the Newmarket Road/B1102 junction in Worlington, through further discussions with the local highway authority, it was agreed pre-application that HGVs would be escorted via convoy marshals through the junction. The reason for this is that HGVs would be required to utilise a significant proportion of the opposing carriageway when making the manoeuvre. This is not the case for cars, and therefore no specific measures are required for staff vehicles. Reference to this agreement is made within Chapter 13: Transport and Access of the Environmental Statement [APP-045] in Table 13-3 'Main Matters Raised during further Consultation'. The Framework Construction Traffic Management Plan and Travel Plan [APP-118] identifies the proposed HGV routes which does not include the Newmarket Road/B1102 junction in Burwell.

Parties	Issue	Summary of issue raised	Applicant's response
RR-0587	Road network	Bridges in the area are unsuitable for construction traffic.	The HGV routes have been identified with consideration of the weight limits of local bridges. This included identifying a new route for Abnormal Indivisible Loads to access the Order limits to avoid the bridge on Ferry Lane. Reference to the route reviews is included in the Framework Construction Traffic Management Plan and Travel Plan [APP-118] .
RR-0895	Road network	Local roads lack appropriate traffic calming measures/crossings.	It is noted that this is perceived to be an existing issue which does not fall within the Applicant's remit to address. The Traffic Regulation Measures Plans – Temporary Road Closures [APP-009 to APP-011] and Traffic Regulation Measures Plans – Temporary Measures [APP-012 and APP-013] identify appropriate measures to provide safe entry and egress to and from the construction site accesses during the construction period.
RR-0822	Road network	Sunnica must build a service road linking Sunnica East A and B onto Elm Road to avoid routing through villages.	It is unclear which local villages the comment refers too. However, the HGV routes have been identified to minimise the number of villages HGVs are required to travel through. The HGV routes are provided within the Framework Construction Traffic Management Plan and Travel Plan [APP-118] . This includes a short section of Elms Road to/from the A11 Northbound Off-Slip and the Red Lodge Dumbbell roundabouts to avoid local villages. The HGV route to Sunnica East A is identified via Newmarket Road which avoids the village of Freckenham. Furthermore, Chapter 13: Transport and Access of the Environmental Statement [APP-045] sets out in detail the assessment of traffic impacts from the Scheme, demonstrating that additional mitigation is not required.
RR-0586, RR-0588	Road network	The proposed measures will involve a traffic light at the Walnut Tree Junction in Worlington.	This statement is understood to be incorrect. It was agreed pre-application with the local highway authority to escorting HGVs associated with the Scheme via a convoy marshal through the Newmarket Road/B1102 junction in Worlington. Reference to this agreement is made within Chapter 13: Transport and Access of the Environmental Statement [APP-045] in Table 13-3 'Main Matters Raised during further Consultation'. The HGV routes are provided within the Framework Construction Traffic Management Plan and Travel Plan [APP-118] .
RR-0072	Routing	Scheme vehicles should not be allowed to use the junction of	The HGV routes are identified in the Transport Assessment [APP-117] and provided in the Framework Construction Traffic Management Plan and Travel Plan

Parties	Issue	Summary of issue raised	Applicant's response
		North Street, Elms Road and Mildenhall Road.	[APP-118] and do not include the North Street/Mildenhall Road/Elms Road junction. A parking strategy has been developed to minimise the requirement of construction staff to travel on the local highway network. This includes two staff car parks located in close proximity to the A11. Construction staff vehicles will be on the highway network before 0700 and after 1900, therefore outside of the network peak hours. The HGV routes are identified and are focused on the A11, A14 and A142. Further information is provided in the Framework Construction Traffic Management Plan and Travel Plan [APP-118] .
RR-1136	Routing	The West Site B access will involve traffic passing through Snailwell. There is a 7.5T limit in place to protect the village from HGV traffic.	This comment is noted. This is outlined in the Transport Assessment [APP-117] : <i>"Snailwell Road is located to the south of Sunnica West Site B. It is a single carriageway road with a 7.5t weight restriction on the bridge over the River Snail"</i> . The HGV routes are identified in the Framework Construction Traffic Management Plan and Travel Plan [APP-118] and do not include passing over the bridge with the 7.5T weight limit.

RR-0012, RR-0166, RR-0181, RR-0243, RR-0259, RR-0288, RR-0296, RR-0297, RR-0303, RR-0424, RR-0440, RR-0456, RR-0514, RR-0548, RR-0550, RR-0552, RR-0587, RR-0596, RR-0610, RR-0617, RR-0623, RR-0633, RR-0668, RR-0671, RR-0681, RR-0686, RR-0706, RR-0717, RR-0721, RR-0725, RR-0726, RR-0733, RR-0736, RR-0739, RR-0758, RR-0759, RR-0764, RR-0775, RR-0801, RR-0808, RR-0809, RR-0818, RR-0822, RR-0825, RR-0835, RR-0881, RR-0889, RR-0912, RR-1035, RR-1088, RR-1101, RR-1115, RR-	Safety	Additional traffic will lead to safety issues on local roads.	Analysis of the available Personal Injury Collision (PIC) data is provided in the Transport Assessment [APP-117] and the impact assessment of the Scheme includes in terms of road safety. Personal Injury Collision (PIC) on the surrounding highway network was obtained from SCC and CCC. Overall, with the data available the PIC analysis did not indicate a particular safety concern that needs to be considered as part of the Scheme.

1125, RR-1131, RR-1141, RR- 1164, RR-1190, RR-1222, RR- 1301			

Parties	Issue	Summary of issue raised	Applicant's response
RR-0072, RR-0228	Safety	The roads lack pavements and cut verges, making them dangerous for pedestrians.	The impact of increased traffic levels on safety of Non-Motorised Users (NMUs) has been assessed within Chapter 13: Transport and Access of the Environmental Statement [APP-045] and the Transport Assessment [APP-117] . The level of, or lack of, pedestrian facilities in each location has been incorporated into the identification of the sensitivity of links. The assessment has concluded that the construction phase will not have a significant impact on pedestrian safety in EIA terms.
RR-0808	Traffic	Changes to the road layout on Chippenham High Street will increase the likelihood of speeding through the village.	The changes to the road layout on Chippenham High Street referred to in the comment are not proposed by the Applicant or as a result of the proposed Scheme. A parking strategy has been developed to minimise the requirement of construction staff to travel on the local highway network including Chippenham High Street. This includes two staff car parks located in close proximity to the A11. Construction staff vehicles will be on the highway network before 0700 and after 1900, therefore outside of the network peak hours. The HGV routes are identified and are focused on the A11, A14 and A142 and exclude Chippenham High Street. Further information is provided in the Framework Construction Traffic Management Plan and Travel Plan [APP-118] . Therefore, there will be minimal vehicles through Chippenham as a result of the proposed Scheme.
RR-0120, RR-0905	Traffic	Concern about an increase in vehicle movements near homes.	It is unclear which specific location is in question. A parking strategy has been developed to minimise the requirement of construction staff to travel on the local highway network. This includes two staff car parks located in close proximity to the A11. The HGV routes are identified and are focused on the A11, A14 and A142. Further information is provided in the Framework Construction Traffic Management Plan and Travel Plan [APP-118] .
RR-0002, RR-0007, RR-0009, RR-0021, RR-0024, RR-0035, RR-0044, RR-0046, RR-0049, RR-0053, RR-0072, RR-0076,	Traffic	The Scheme will increase traffic on smaller local roads, including through Chippenham, Mildenhall, Fordham and Snailwell.	Chapter 13: Transport and Access of the Environmental Statement [APP-045] and Transport Assessment [APP-117] assesses the impact of the construction vehicles on the Strategic Road Network and local roads. A parking strategy has been developed to minimise the requirement of construction staff to travel on the local highway network. This includes two staff car parks located in close proximity to the A11. The HGV routes are identified and are focused on the A11, A14 and A142. Further information is provided in the Framework Construction Traffic Management Plan and Travel Plan [APP-118] , and Transport Assessment [APP-117] section 5

Parties	Issue	Summary of issue raised	Applicant's response
RR-0082, RR-0099, RR-0105, RR-0111, RR-0117, RR-0119, RR-0120, RR-0124, RR-0140, RR-0152, RR-0154, RR-0164, RR-0165, RR-0186, RR-0187, RR-0194, RR-0195, RR-0198, RR-0199, RR-0207, RR-0214, RR-0215, RR-0221, RR-0226, RR-0233, RR-0237, RR-0238, RR-0252, RR-0259, RR-0262, RR-0264, RR-0267, RR-0274, RR-0284, RR-0291, RR-0294, RR-0300, RR-0303, RR-0309, RR-0327, RR-0334, RR-0338, RR-0344, RR-0350, RR-0366, RR-0370, RR-0373, RR-0376, RR-0380, RR-0381, RR-0384,			regarding the forecast trip generation, distribution and assignment of construction related vehicles including the local roads identified in the comment. This assessment concluded that there would be no significant traffic effects during the construction phase, which, by its nature, is both short-term and temporary.

Parties	Issue	Summary of issue raised	Applicant's response
RR-0385, RR-0389, RR-0391, RR-0404, RR-0408, RR-0411, RR-0412, RR-0413, RR-0426, RR-0428, RR-0429, RR-0430, RR-0436, RR-0438, RR-0440, RR-0441, RR-0442, RR-0443, RR-0444, RR-0446, RR-0449, RR-0450, RR-0452, RR-0455, RR-0457, RR-0460, RR-0461, RR-0470, RR-0472, RR-0473, RR-0475, RR-0477, RR-0480, RR-0481, RR-0483, RR-0486, RR-0489, RR-0493, RR-0496, RR-0498, RR-0499, RR-0505, RR-0506, RR-0510, RR-0514, RR-0516, RR-0518, RR-0519, RR-0520, RR-0521, RR-			

Parties	Issue	Summary of issue raised	Applicant's response
0523, RR-0524, RR-0534, RR-0539, RR-0542, RR-0545, RR-0550, RR-0552, RR-0564, RR-0568, RR-0587, RR-0602, RR-0610, RR-0610, RR-0611, RR-0615, RR-0626, RR-0628, RR-0633, RR-0636, RR-0637, RR-0646, RR-0659, RR-0663, RR-0668, RR-0672, RR-0673, RR-0681, RR-0686, RR-0689, RR-0692, RR-0698, RR-0705, RR-0706, RR-0709, RR-0713, RR-0717, RR-0721, RR-0725, RR-0726, RR-0733, RR-0735, RR-0736, RR-0738, RR-0744, RR-0747, RR-0763, RR-0764, RR-0769, RR-0773, RR-0774, RR-			

Parties	Issue	Summary of issue raised	Applicant's response
0775, RR-0777, RR-0778, RR- 0790, RR-0793, RR-0825, RR- 0843, RR-0847, RR-0855, RR- 0856, RR-0863, RR-0871, RR- 0893, RR-0895, RR-0896, RR- 0901, RR-0904, RR-0905, RR- 0907, RR-0914, RR-0915, RR- 0916, RR-0924, RR-0928, RR- 0930, RR-0932, RR-0936, RR- 0938, RR-0944, RR-0953, RR- 0954, RR-0967, RR-0972, RR- 0973, RR-0974, RR-0989, RR- 0999, RR-1003, RR-1008, RR- 1015, RR-1019, RR-1020, RR- 1021, RR-1025, RR-1027, RR- 1028, RR-1029, RR-1031, RR- 1034, RR-1035, RR-1042, RR-			

Parties	Issue	Summary of issue raised	Applicant's response
1044, RR-1048, RR-1051, RR-1052, RR-1054, RR-1072, RR-1075, RR-1086, RR-1095, RR-1098, RR-1107, RR-1109, RR-1111, RR-1113, RR-1115, RR-1118, RR-1128, RR-1141, RR-1143, RR-1150, RR-1158, RR-1164, RR-1166, RR-1167, RR-1169, RR-1181, RR-1183, RR-1186, RR-1193, RR-1206, RR-1209, RR-1212, RR-1221, RR-1222, RR-1229, RR-1238, RR-1239, RR-1244, RR-1255, RR-1256, RR-1258, RR-1259, RR-1260, RR-1265, RR-1277, RR-1293, RR-1296, RR-1297, RR-1325, RR-1334, RR-1336, RR-			

Parties	Issue	Summary of issue raised	Applicant's response
1339, RR-1350, RR-1355, RR-1357, RR-1360			
RR-0261, RR-0307, RR-0311, RR-0322, RR-0350, RR-0726, RR-0957, RR-0991, RR-1086, RR-1112, RR-1116	Traffic	The Scheme will increase traffic on the strategic roads network.	It is appreciated that the Scheme will increase traffic on the Strategic Roads Network. However, this impact will be short term and temporary during the construction phase. The Framework Construction Traffic Management Plan and Travel Plan [APP-118] includes embedded mitigation measures to reduce the impact of this traffic, notably the 0700-1900 shift pattern meaning that construction staff vehicles will be on the highway network before 0700 and after 1900, therefore outside of the network peak hours. The HGV routes are identified and are focused on the A11, A14 and A142. Further information is provided in the Framework Construction Traffic Management Plan and Travel Plan [APP-118] . Consultation has been undertaken with National Highways, which has not raised concerns with the forecast level of construction staff vehicles or HGVs on the Strategic Road Network.
RR-0026, RR-0030, RR-0166, RR-0214, RR-0226, RR-0220, RR-0323 RR-0370, RR-0371, RR-0411, RR-0455, RR-0503, RR-0511, RR-0513, RR-0519, RR-0542, RR-0574, RR-0773, RR-0786, RR-0826, RR-0850, RR-0852, RR-0863, RR-0912, RR-0982, RR-0991, RR-1130,	Traffic	The Scheme will exacerbate existing traffic congestion.	The effect of the Scheme in terms of driver delay is set out in Chapter 13: Transport and Access of the Environmental Statement [APP-045] . The Framework Construction Traffic Management Plan and Travel Plan [APP-118] sets out embedded mitigation to minimise the impact on congestion, including focusing staff travel outside of network peaks and the use of a parking strategy to minimise the requirement of construction staff to travel on the local highway network. This includes two staff car parks located in close proximity to the A11. The HGV routes are identified and are focused on the A11, A14 and A142. Further information is provided in the Framework Construction Traffic Management Plan and Travel Plan [APP-118] . The conclusion of the assessment is that the construction phase will not have a significant impact on driver delay, i.e., congestion, in EIA terms.

Parties	Issue	Summary of issue raised	Applicant's response
RR-1141, RR-1147, RR-1235			
RR-0124, RR-0145, RR-0525, RR-0895, RR-0944, RR-1227, RR-1278	Traffic	The very scale of the Scheme will make it harder to get around the local area.	A parking strategy has been developed to minimise the requirement of construction staff to travel on the local highway network. This includes two staff car parks located in close proximity to the A11. Construction staff vehicles will be on the highway network before 0700 and after 1900, therefore outside of the network peak hours. The HGV routes are identified and are focused on the A11, A14 and A142, with HGVs movements distributed throughout the day avoiding the network peak hours. The road closures are required for a temporary and short-term period which are expected to last no longer than one-week and occur on narrow roads where the use of two-way traffic signals are not possible and are identified in the Traffic Regulation Measures Plans – Temporary Road Closures [APP-009 to APP-011] drawings. In addition, the Traffic Regulation Measures Plans – Temporary Measures [APP-012 to APP-013] identify the proposed temporary speed limit reductions and temporary traffic signals for the construction site accesses to provide safe entry and egress. These are not forecast to be required for the entire length of the construction period and will only be required when the site access or cabling across roads is required. Advanced warning of road and PRow closures will be provided. In addition, three permissive routes will be provided in the future during the operational phase.
RR-0009, RR-0226, RR-0256, RR-0263, RR-0429, RR-0507, RR-0525, RR-0542, RR-0594, RR-0615, RR-0672, RR-0681, RR-0709, RR-0775, RR-0895, RR-0924, RR-0928, RR-0936, RR-0975, RR-	Traffic	The Scheme will disrupt journeys to work.	The effect of the scheme in terms of driver delay is set out in Chapter 13: Transport and Access of the Environmental Statement [APP-045] . The Framework Construction Traffic Management Plan and Travel Plan [APP-118] sets out embedded mitigation to minimise the impact on congestion, including focusing staff travel outside of network peaks and the use of a parking strategy to minimise the requirement of construction staff to travel on the local highway network. This includes two staff car parks located in close proximity to the A11. The HGV routes are identified and are focused on the A11, A14 and A142. Further information is provided in the Framework Construction Traffic Management Plan and Travel Plan [APP-118] . The conclusion of the assessment is that the construction phase will not have a significant impact on driver delay, i.e., congestion, in EIA terms.

Parties	Issue	Summary of issue raised	Applicant's response
1019, RR-1025, RR-1027, RR-1048, RR-1075, RR-1110, RR-1125, RR-1131, RR-1186, RR-1193, RR-1206, RR-1235, RR-1301			The temporary road closures are required for a temporary and short-term period which are expected to last no longer than one-week and occur on narrow roads where the use of two-way traffic signals is not possible. These are shown on Traffic Regulation Measures Plans – Temporary Road Closures [APP-009 to APP-011] . Further information is provided in Section 4 of the Transport Assessment [APP-117] .
RR-0511, RR-0564, RR-0574, RR-0587, RR-0615, RR-0889, RR-0895, RR-1227	Traffic	Additional traffic will impact negatively on horses using the roads and the horseracing industry more generally including the transport of horses.	The impact on Non-Motorised Users (NMUs), which includes horse riders on the local road network and PRow, are set out in Chapter 13: Transport and Access of the Environmental Statement [APP-045]. It is not considered that the Scheme will have a significant environmental impact on NMUs (and therefore horse riders) during the construction period as a result of the construction staff vehicles or HGVs. The transport impacts for the construction period are assessed in Chapter 13: Transport and Access [APP-045] of the Environmental Statement. This has shown that with the implementation of embedded mitigation measures there will be no significant effects in relation to driver delay as a result of an increase in traffic on the surrounding network or accidents and safety as a result of the Scheme.
RR-0896	Traffic	Previous works to extend the substation at Burwell resulted in traffic impacts.	Chapter 13: Transport and Access of the Environmental Statement [APP-045] sets out in detail the assessment of traffic impacts from the Scheme, demonstrating that additional mitigation, beyond what is provided in the Framework Construction Traffic Management Plan and Travel Plan [APP-118] , is not required.

3.15 Water Resources

3.15.1 82 individual comments were received in relation to water resources.

Applicant's responses to RRs relating to water resources

Parties	Issue	Summary of issue raised	Applicant's response
RR-0042, RR-0987, RR-1246	BESS	It is dangerous to locate the BESS close to water supplies.	Paragraph 9.7.61 of Chapter 9: Flood Risk, Drainage and Water Resources of the Environmental Statement [APP-041] explains the approach to managing fire risk at the three BESS compounds. It is not anticipated that active firefighting would be undertaken as this can spread chemicals used in the process and which are potentially harmful to the water environment. Instead, any apparatus or containers that catch fire will be allowed to burn out. Water stored on site in steel tanks will be sprayed onto adjacent containers to keep them cool and reduce the risk of the fire spreading. The water used will therefore be less likely to be contaminated but will still be directed to the fire water storage lagoons (with capacity greater than the water stored on site for controlling the spread of a fire) from where decisions about suitable disposal can be made post incident (e.g., to pump out to tankers for removal and disposal at a suitable licenced waste facility off-site). As such, there would be no direct pathway to any watercourse and a neutral impact was predicted on relevant receptors (alongside diffuse urban runoff risks as a whole) (see paragraphs 9.8.173 to 9.8.177 in Chapter 9: Flood Risk, Drainage and Water Resources of the Environmental Statement [APP-041]). It should also be recognised that a fire would be an unlikely event rather than an ongoing impact. The BESS at Sunnica East A has nearby irrigation lagoons which are used for agricultural irrigation and not drinking water. It is considered that these would not be in hydrological connectivity with the BESS lagoon. Private Water Supplies 1, 3 and 4 are located relatively nearby (see Figure 9.1 of the Environmental Statement [APP-188]). However, the occurrence of a BESS fire is unlikely, and as discussed above firefighting chemicals are not to be used; water will only be used to cool adjacent structures. This water will be captured in the fire-fighting water holding bunded lagoon. The procedure for dealing with a fire, and consideration of

Parties	Issue	Summary of issue raised	Applicant's response
			local receptors, would be included within the Framework Operation Environmental Management Plan [APP-126]. Private Water Supply 2 is relatively near to the BESS at Sunnica East B (as shown on Figure 9.1 of the Environmental Statement [APP-188]). As above, occurrence of a BESS fire is unlikely, and as discussed above firefighting chemicals are not used, with water only used to cool adjacent structures. This water will be captured in the firefighting water holding bunded lagoon. The procedure for dealing with a fire, and consideration of local receptors, would be included within the Framework Operation Environmental Management Plan [APP-126]. There are no known private water supplies within 1km of the BESS at Sunnica West A.
RR-0064, RR-0097, RR-0110, RR-0189, RR-0194, RR-0195, RR-0207, RR-0226, RR-0233, RR-0267, RR-0328 RR-0417, RR-0458, RR-0459, RR-0505, RR-0507, RR-0548, RR-0581, RR-0651, RR-0697, RR-0709, RR-0733, RR-0743, RR-0764, RR-0871, RR-0895, RR-0944,	Contamination	The Scheme will result in water contamination. In particular, there is concern about the impact of run-off into chalk streams and drinking water supplies.	The Applicant has identified all the waterbodies and water resources within the study area, and these are presented on Figure 9.1 of the Environmental Statement [APP-188] and discussed in Section 9.6 of Chapter 9: Flood Risk, Drainage and Water Resources of the Environmental Statement [APP-041]. New River was identified as having a chalk stream character. Water supplies taken from watercourses are included in the importance setting of those waterbodies. Where there are abstractions from the ground, these are also taken into account within the importance setting for the groundwater body. The assessment has considered both construction and operational impacts and has concluded that there would not be any significant effects on the water quality of watercourses and water supplies with the application of the good practice mitigation to manage the risk of chemical leaks and to remove fine sediment from discharges of site runoff during construction, as defined within Chapter 9: Flood Risk, Drainage and Water Resources of the Environmental Statement [APP-041] and in the Framework Construction Environmental Management Plan [APP-123].

Parties	Issue	Summary of issue raised	Applicant's response
RR-1024, RR-1025, RR-1036, RR-1057, RR-1066, RR-1109, RR-1125, RR-1128, RR-1130, RR-1142, RR-1206, RR-1221, RR-1235, RR-1246, RR-1319			
RR-0021, RR-0022, RR-0328, RR-0568, RR-0587, RR-0847, RR-0858, RR-0945, RR-1136	Contamination	Fumes from fires at the BESS could contaminate watercourses.	It is unclear to the Applicant how fumes from a fire would lead to the contamination of a watercourse. Fumes are gaseous emissions that would vent to the air and thus there would not be a pathway for any gaseous chemical contaminants to enter a watercourse. Paragraph 9.7.61 of Chapter 9: Flood Risk, Drainage and Water Resources of the Environmental Statement [APP-041] explains the approach to managing fire risk at the three BESS compounds. It is not anticipated that active firefighting would be undertaken as this can spread chemicals used in the process and which are potentially harmful to the water environment. Instead, any apparatus or containers that catch fire will be allowed to burn out. Water stored on site in steel tanks will be sprayed onto adjacent containers to keep them cool and reduce the risk of the fire spreading. The water used will therefore be less likely to be contaminated but will still be directed to the fire water storage lagoons (with capacity greater than the water stored on site for controlling the spread of a fire) from where decisions about suitable disposal can be made post-incident (e.g., to pump out to tankers for removal and disposal at a suitable licenced waste facility off-site). As such, there would be no direct pathway to any watercourse and a neutral impact was predicted on relevant receptors (alongside diffuse urban runoff risks as a whole) (see paragraph 9.8.173 to 9.8.177 in Chapter 9: Flood Risk, Drainage and Water Resources of the Environmental Statement [APP-041]). It should also be recognised that a fire would be an unlikely event rather than an ongoing impact.

Parties	Issue	Summary of issue raised	Applicant's response
RR-1136	Contamination	There is no consideration of the effect to the ground water source protection zone including the Cam and Ely Ouse chalk ground water area if contaminated by run off contaminated with toxins.	The Scheme is not present in areas of Source Protection Zone 1 or 2. Parts of the Scheme is within Source Protection Zone 3. This represents the total catchment to a public potable water abstraction. The potential impact on Source Protection Zones and groundwater in general (including the Cam and Ely Ouse area chalk aquifer / WFD water body) has been considered by Chapter 9: Flood Risk, Drainage and Water Resources of the Environmental Statement [APP-041] and the Water Framework Directive Assessment presented in Appendix 9B [APP-094]. The assessment concludes that the Scheme does not represent significant risks of pollution to the Source Protection Zone, groundwater or WFD compliance (including for the Cam and Ely Ouse groundwater body) with the mitigation measures proposed in Section 9.7 and as described in the Framework Construction Environmental Management Plan [APP-123]. Measures outlined in the Framework Construction Environmental Management Plan [APP-123] and the Framework Operational Environmental Management Plan [APP-126] will ensure that pollution risks will be avoided and minimised. This includes the application of best practice guidance, the management of construction site runoff and spillage risk, and the management of pollution risks associated with works below ground and where excavations are required. Once operational, surface water will be managed using sustainable drainage systems with a means to isolate fire water in a storage lagoon in the event of a fire (noting that fire-fighting chemicals will not be used, and water will only be used to cool neighbouring structures to prevent the spread of the fire). Full details of the risk assessment to groundwater for the construction of the Scheme is included in Chapter 9: Flood Risk, Drainage and Water Resources of the Environmental Statement [APP-041], paragraphs 9.8.7 to 9.8.21, 9.8.34 to 9.8.47, 9.8.59 to 9.8.70, 9.8.84 to 9.8.93, 9.8.107 to 9.8.114, and 9.8.128 to 9.8.135. There are considered to be no significant effects from construction with the embedded mitigation outlined in section 9.7 in place. During operation the full details of the risk assessment to groundwater are included in Chapter 9: Flood Risk, Drainage and Water Resources of the Environmental Statement [APP-041], paragraphs 9.8.178 to 9.8.182, 9.8.185 to 9.8.189, 9.8.192 to 9.8.196, 9.8.199 to 9.8.203, 9.8.206 to 9.8.208, 9.8.211 to 9.8.213 and 9.8.219.

Parties	Issue	Summary of issue raised	Applicant's response
			The outcome of the assessments is that there are no significant effects on groundwater.
RR-0328, RR-1057	Disposal	There is no plan for the safe disposal of contaminated toxic water.	Measures outlined in the Framework Construction Environmental Management Plan [APP-123] will ensure that pollution risks during construction will be avoided and minimised. This includes the application of best practice guidance, the management of construction site runoff and spillage risk, and the management of pollution risks associated with works below ground and where excavations are required. Within the Framework Operation Environmental Management Plan [APP-126], Table 3-4 details how potential impacts are to be mitigated during operation, and whose responsibility it will be. All hazardous materials, including chemicals such as cleaning agents and solvent containing products are to be properly sealed in suitable containers at the end of each day prior to storage in appropriately protected and bunded storage areas. Table 3-10 Waste in the Framework OEMP [APP-126], states that any material requiring removal from the Order limits during operation would be transported using licensed carriers and records kept. The records would detail the types and quantities of waste moved and the destinations of this waste in accordance with the relevant regulations. In the event of a fire at the BESS, no fire-fighting chemicals are proposed. Water stored on site will be used to keep cool adjacent structures. This water will be intercepted by a storage lagoon and only discharged to a watercourse if suitable to do so following chemical testing. If contaminated, the water would be pumped out to a tanker for off-site disposal at a licensed wastewater facility.
RR-1043	Drainage	Further detail of the SuDs is required.	As stated in Annex F: Drainage Technical Note within Appendix 9C: Flood Risk Assessment – Part 4 [APP-098] , paragraph 3.1.3, detailed drainage designs and SuDS feature locations will be determined post consent at detailed design stage. The proposed strategy is outline, with site development detail not confirmed at this stage. Paragraph 3.1.4 of Annex F: Drainage Technical Note [APP-098] refers to general arrangement drawings ([WPP-ACM-XX-DR-C-ZZ-001 to 008]) which show the outline location of these SuDS features based on a topographical survey

Parties	Issue	Summary of issue raised	Applicant's response
			assessment of land features and gradients. Outline assessment of swale capacities and pond capacities has been undertaken, in Sub Annex C of Annex F Drainage Technical Note [APP-098] . The exact location of these features is to be confirmed at detailed design stage, post consent. These drawings are included within Sub-Annex F of Annex F Drainage Technical Note [APP-098] , Drainage General Arrangements. The drainage strategy will be secured through Requirement 12 (Surface and foul water drainage) described in the draft DCO [APP-019] .
RR-0565	Drainage	Will the concrete affect ground water drainage?	Due to the small footprint of each structure, the change in pattern of rainfall and recharge to the Chalk aquifer will be negligible. No change in groundwater flow patterns is anticipated.
RR-0007, RR-0653, RR-0669, RR-0684, RR-0790, RR-1125, RR-1128	Flood risk	Similar sites have had flooding issues in the past.	Each site assessment is individual based on its own merits and the particular topography and flooding susceptibility in the area. A Flood Risk Assessment (Part 1) [APP-095] has been undertaken to ensure the potential risks of flooding to, or flooding from, the Scheme for all sources of flooding, as set out in the National Planning Policy Framework, have been taken into account within the design. The Flood Risk Assessment (Part 1) [APP-095] , in Table 17 summarises the assessment. The assessment concludes there will be no negative change to existing flood risk (fluvial, tidal, pluvial, groundwater, sewers and artificial sources) between pre-development risk and post development risk, i.e., there is no increase in flood risk as a result of the Scheme.
RR-0165, RR-0257	Flood Risk	The Scheme will raise the water level of the River Lark.	The Scheme will not increase river levels of the River Lark, it will be reduced during peak storm events, managed through the SuDS and runoff attenuation measures proposed, in line with LLFA requirements. Within Annex F Drainage Technical Note [APP-098] , the proposed surface water drainage strategy is outlined. Paragraph 3.1.1 states the proposed surface water drainage strategy for the Scheme is to mimic the natural drainage conditions of the Order limits as much as possible, i.e., discharging to ground at source, with excess flows acting as sheet runoff. Any areas of the Scheme that increase the impermeable area will be served by attenuation and control features to ensure existing discharge rates are not increased. SuDS features will capture sheet runoff, and will include an allowance for exceedance capacity in the form of freeboard (300mm), which will reduce peak runoff rates and volumes off site during extreme storm events, thus reducing flood risk downstream, including runoff into the River Lark.

Parties	Issue	Summary of issue raised	Applicant's response
RR-0014, RR-0318, RR-0324, RR-0390, RR-0428, RR-0939, RR-1357	Flood risk	The Scheme will increase flood risk.	The Flood Risk Assessment (FRA) [APP-095 to 098] has assessed the potential for the Scheme to impact flood risk on or off the Order limits. The FRA [APP-095] concludes that the Scheme will not increase the existing flood risk on or off the Order limits as a result of the development proposals.
RR-0831	Impact	The Scheme will impact on the use of a water reservoir next to Sunnica East Site B which will be a waste of resource.	A private surface water 'reservoir' is contained within the Order limits of Sunnica East Site B, as shown on Figure 1-2 of the Environmental Statement [APP-130] . The Application does not seek development consent for any works in relation to this reservoir. Please refer to Works Plans sheets 7 and 8 [APP-007] to confirm the areas seeking development consent.
RR-0567	Management	Appropriate oversight is required during construction to ensure mitigation relating to drainage.	The construction process will take place according to methodologies and mitigation as outlined in the Framework Construction Environmental Management Plan [APP-123] . Table 3-4: Flood Risk, Drainage and Water Resources of this document outlines the mitigation required during construction relating to drainage. This includes the use of temporary drainage systems, the recommendation to follow the relevant site drainage sections of BS6031: Code of Practice for Earthworks, and drainage systems being designed to prevent significant increases in flood risk downstream during the 1 in 100 annual probability design flood, with an allowance of 40% for climate change as agreed with the Lead Local Flood Authority (LLFA). Following the proposals in the Construction Environmental Management Plan will ensure appropriate oversight is being given to drainage mitigation during construction. The LLFA will also approve the drainage strategy and drainage mitigation measures during construction, under Requirement 12 of the DCO.
RR-0890	Manufacturing	The manufacturing of the solar panels and batteries involves polluting water courses with heavy metals.	The Environmental Statement has assessed the likely significant environmental effects of the Scheme and the Applicant does not seek development consent to the manufacture of PV panels or batteries at the site. The manufacture of PV panels and batteries would be carried out in accordance within the relevant legal regimes in which those manufacturers operate. At the time of running the procurement, care will be taken to ensure that the supply chain from where the equipment is sourced avoids that which is environmentally damaging. The requirement to consider environmentally

Parties	Issue	Summary of issue raised	Applicant's response
			damaging criteria within the procurement process will be included within the next iteration of the Outline Skills, Supply Chain and Employment Plan [APP-268] .
RR-0548	Regulation	The site covers a source protection zone.	The Scheme is not present in areas of Source Protection Zone 1 or 2. Parts of the Scheme are within Source Protection Zone 3. This represents the total catchment to an abstraction. However, the Scheme is not considered to represent significant risks of pollution to the abstraction with the implementation of mitigation measures. Source Protection Zones are acknowledged in the baseline paragraph 9.6.153 within Chapter 9: Flood Risk, Drainage and Water Resources of the Environmental Statement [APP-041]. These are taken into account within the importance setting for the groundwater body. The assessment has considered construction and operational impacts and has concluded that there would not be any significant effects on the groundwater body with the application of the mitigation defined within Chapter 9: Flood Risk, Drainage and Water Resources of the Environmental Statement [APP-041].
RR-0324, RR-0593, RR-0603, RR-0858	Watercourses	The Scheme will result in the pollution of waterways including Lee Brook. Chalk aquifers mean that contaminated water will enter the water system.	The potential for adverse impacts on watercourses, both Main Rivers and ordinary watercourses, including whether they may be chalk rivers (in which case they have been considered as being more important) has been assessed within Chapter 9: Flood Risk, Drainage and Water Resources of the Environmental Statement [APP-041]. Section 9.7 details the embedded mitigation to be employed during constructions of watercourse crossings, both via non-intrusive techniques (paragraphs 9.7.16 to 9.7.22) and intrusive techniques (paragraphs 9.7.23 to 9.7.28), as well as construction risks more generally. A 10m buffer from the edge of the typical channel / water's edge of watercourses is proposed meaning that solar panels and their construction will be set back from watercourses, reducing the risk of any adverse impact and maintaining riparian corridors. Where watercourses need to be crossed either for access or for laying power cables, additional mitigation measures are proposed (noting that only minor watercourses would be crossed using an intrusive technique).

Parties	Issue	Summary of issue raised	Applicant's response
			Overall, the assessment concludes that with the embedded mitigation there would be no significant effects on surface watercourses within the area of the Scheme, including the Lee Brook. Within Chapter 9: Flood Risk, Drainage and Water Resources of the Environmental Statement [APP-041], potential construction risks to Sunnica East Site A, which is adjacent to Kennet-Lee Brook is assessed in paragraphs 9.8.7 to 9.8.21. This concludes that with the embedded mitigation measures in place (outlined in Section 9.7 of Chapter 9: Flood Risk, Drainage and Water Resources of the Environmental Statement [APP-041]) there would be no significant effects to groundwater. For operation, potential impacts and effects on groundwater are presented in paragraphs 9.8.178 to 9.8.182 of Chapter 9: Flood Risk, Drainage and Water Resources of the Environmental Statement [APP-041]. The assessment concludes that with the embedded mitigation measures within the Framework Operational Environment Management Plan [APP-126] there would be no significant effects on groundwater. Within the Flood Risk Assessment (Part 1) [APP-095] the infiltration SuDS techniques, swales and basins, will be designed to mimic existing drainage and will not alter existing runoff rates. The Flood Risk Assessment includes Annex F Drainage Technical Note [APP-098]. SuDS provides an opportunity to capture and treat runoff by intercepting, filtering and degrading any pollutants. In order to assess the risk to receiving watercourses, an assessment has been undertaken of the proposed surface water drainage system in accordance with the SuDS manual. This assessment therefore demonstrates the Scheme will not result in operational water contamination – either surface water or groundwater.
RR-1138	Water supplies	Any work must avoid disruption to water supplies and the infrastructure related to them.	The comment is noted. Work on the Scheme will avoid disruption to water supplies and infrastructure related to them.

Parties	Issue	Summary of issue raised	Applicant's response
			The draft DCO [APP- 019] Schedule 12 Protective Provisions, Part 3 Protection of Anglian Water states the provisions in place for the protection of water supplies infrastructure.
RR-0854, RR-0982,	Water use	Further information is required regarding the availability of water sources to fight fires.	The Outline Battery Fire Safety Management Plan [APP-267] outlines the water sources used for firefighting. Water will be stored on site in steel tanks to be used for fire-fighting. The supply of the water to fill the containers would be obtained from either a third-party supplier or could be abstracted from local natural sources subject to obtaining the appropriate licence from the Environment Agency. However, this would be a one-off event rather than an ongoing abstraction. Sufficient water storage will be provided for all firefighting systems (manual and automatic). The minimum water supply requirement taken from British standard BS9990 is 1500 l/min flow for 45-minutes. To align the requirement with the UK market, it is proposed to use a flow of 1500 l/min for a duration of 120 minutes. This has been discussed and agreed with Suffolk Fire and Rescue Services.
RR-0614	Water use	The Scheme will have a damaging impact on local water resources due to the amount of water needed for maintenance of immense solar farms.	The operator of the Scheme will be required to source water from a suitable source for ongoing requirements such as cleaning panels. This may involve purchasing water when needed from a suitable third party provider. Alternatively, where water is sourced from a local natural source, this would need to be in accordance with any abstraction licence from the Environment Agency (if the volumes to be abstracted are sufficiently high).

3.16 Human Health

3.16.1 291 individual comments were received in relation to human health.

Applicant's responses to RRs relating to human health

Parties	Issue	Summary of issue raised	Applicant's response
RR-0619, RR-0891, RR-0907	Air quality	There is not trusted information available about the air quality impacts of a fire at the BESS.	Consideration of emissions from the BESS is based on published emissions data from laboratory and field based studies as cited in Appendix 16D: Unplanned Atmospheric Emissions from Battery Energy Storage Systems (BESS) [APP-124]. The assessment of the BESS has taken a worst-case risk assessment approach and has determined what the dilution rates will be for any plume from a fire as it disperses from the sites. The results show that by the time a plume was to reach the nearest receptor the pollutants would be diluted considerably. The assessment has demonstrated that even with a worst-case estimate of potential pollutant release concentration, the dilution means there is no adverse impact. Please see the Statement of Competence, included as Appendix 1C of the Environmental Statement [APP-053] for the authors' qualifications.
RR-0119, RR-1278	Air quality	The Scheme will negatively impact air quality, with human health consequences.	The air quality impacts of the Scheme as reported in Chapter 14: Air Quality of the Environmental Statement [APP-046] are temporary, and no significant adverse impacts have been identified. The Applicant acknowledges that there would be a negative impact on human health in respect of air quality during construction, which would be temporary.
RR-1278	Air quality	Concern about impacts on health from poorer air quality.	There are no operational impacts on local air quality, as the site does not generate emissions, nor does it generate significant vehicle trips. A full dispersion modelling exercise has been undertaken to establish the potential impacts of the construction vehicles on local air quality. This shows that there will be no significant impact on local air quality during the construction period. For further information, please refer to Chapter 14: Air Quality of the Environmental Statement [APP-046]
RR-0014, RR-0033, RR-1109	Assessment	Further information is required regarding impacts on human health.	An assessment of the impacts of the Scheme on a range of health determinants is set out in Chapter 15: Human Health of the Environmental Statement [APP-047]. This includes a summary of likely impacts and concludes that where negative impacts arise these can be mitigated, with other impacts assessed as either neutral or positive in respect of human health.

Parties	Issue	Summary of issue raised	Applicant's response
RR-0982	Assessment	The Health and Safety Executive should be involved in assessing the health and safety effects of the BESS.	The Applicant has consulted with the HSE during the preparation of the Outline Battery Fire Safety Management Plan [APP-267] . This document will be updated during each stage of the project lifecycle and will include ongoing consultations with the HSE and other applicable stakeholders.
RR-0004, RR-0005, RR-0024, RR-0025, RR-0031, RR-0033, RR-0142, RR-0328, RR-0387, RR-0507, RR-0607, RR-0936, RR-1136, RR-1230	BESS	Further information is required regarding the impact of fire at the BESS on the emergency services.	The Outline Battery Fire Safety Management Plan [APP-267] has confirmed that an Emergency Response Plan will be prepared by the operator during the detailed design stage of the Scheme as part of the Battery Fire Safety Management Plan. The plan will cover fire safety of first responders and will be developed in consultation with the emergency services. The Outline Battery Fire Safety Management Plan [APP-267] has been peer reviewed by a battery energy storage system (BESS) expert since original submission as part of the Application and updated accordingly. Appendix 16D: Unplanned Atmospheric Emissions from Battery Energy Storage Systems (BESS) [APP-124] has also been updated. The Applicant intends to submit the revised drafts of the Outline Battery Fire Safety Management Plan and Battery Energy Storage Systems (BESS) documents at Deadline 2.
RR-0619, RR-0907	BESS	There are health concerns about the components of the BESS, including lithium-ion batteries.	The BESS will be secured and access to its components will be off-limits to the public, so components of the BESS will not be accessible. Health issues are therefore not expected to arise as a result. An assessment of the impacts of the Scheme on a range of health determinants is set out in Chapter 15: Human Health of the Environmental Statement [APP-047] . This includes a summary of likely impacts and concludes that where negative impacts arise these can be mitigated, with other impacts assessed as either neutral or positive in respect of human health.
RR-0895, RR-0974, RR-1130, RR-1349	Electromagnetic fields	Electromagnetic fields from the Scheme will have a negative impact on human health.	All items carrying some form of electrical voltage or current are subject to electric and magnetic fields. The impact upon human health of these fields was scoped out of the Environmental Impact Assessment (EIA) in agreement with the Planning Inspectorate at the initial scoping stage undertaken in 2019. This was because it was considered that the proposed Scheme did not present any significant risk to human health through such fields. Public Health England was consulted at this stage and raised no concerns.

Parties	Issue	Summary of issue raised	Applicant's response
RR-0982	Emergency services	Further information is required regarding access to the Scheme and PROW by emergency services.	In total there are 35 site accesses across the Scheme which will provide access into/out of the Scheme which includes emergency services throughout the construction, operational and decommissioning phases. When each of these site accesses are required (and thus also available to emergency services) is set out in Table B-9 of the Design and Access Statement [APP-264]. There are eight PROWs which are required to be temporarily closed during the construction period. The Scheme has been designed to minimise the number of PROW closures and the length of time required to be closed. The PROWs are not expected to be closed all at the same time. The PROWs are expected to be closed for no more than three weeks which is considered the worst-case scenario. Advanced warning of road and PROW closures will be provided.
AS-013	Emergency services	The incidence and impact of major accidents (and disasters) on EEAST and its HEMS partner operational resources, capacity and efficiency (including EEAST hazardous area response teams - HART) needs to be presented and assessed, with appropriate mitigation and management measures proposed, secured and implemented within a Section 106 planning obligation or Deed of Obligation, as part of any Development Consent Order approval.	Major accidents and disasters have been assessed as part of Chapter 16: Other Environmental Topics of the Environmental Statement [APP-048] , concluding there are no likely significant effects. No mitigation measures that would need to be secured by a Section 106 planning obligation have been identified.
RR-0004, RR-0005, RR-0012, RR-0020, RR-0025, RR-0028, RR-0029, RR-0031, RR-0032,	Evacuation	There is a risk that residents or horses would need to be evacuated if a fire broke out.	It is considered unlikely that residents or horses would need to be evacuated in the unlikely event of a fire in one of the BESS areas. Appendix 16D: Unplanned Atmospheric Emissions from Battery Energy Storage Systems (BESS) of the Environmental Statement [APP-124] has considered the nearest receptors in all directions (250m away) from the BESS sites. These are considered to represent a worst case in comparison to other receptors located further away. Two locations

Parties	Issue	Summary of issue raised	Applicant's response
RR-0033, RR-0042, RR-0099, RR-0110, RR-0113, RR-0123, RR-0124, RR-0130, RR-0136, RR-0148, RR-0176, RR-0210, RR-0229, RR-0335, RR-0350, RR-0444, RR-0446, RR-0459, RR-0548, RR-0563, RR-0623, RR-0704, RR-0727, RR-0823, RR-0847, RR-0882, RR-0914, RR-1018, RR-1066, RR-1086, RR-1097, RR-1125, RR-1130, RR-1164, RR-1186, RR-1210, RR-1315			that have been considered are the Pines Primary School in Red Lodge, and Brookside Stud. Both locations can be seen in Figure A2 of Appendix 16D: Unplanned Atmospheric Emissions from Battery Energy Storage Systems (BESS) of the Environmental Statement [APP-124]. All off-site receptors are located far enough from the BESS sites that a measurable change of pollutants would not be able to occur with the level of dilution demonstrated to occur over this distance, for the scale of BESS proposed. Source concentrations would be diluted to 1/1000th of the source concentration (a dilution factor of 0.001) under 90% of the meteorological conditions likely to occur at the application site (see Table 3-2), within 50m or less for all wind directions. In the unlikely event of a 5-rack fire at the BESS before fire control measures bring the fire under control, concentrations of hydrogen fluoride (HF) over time periods of 10 minutes, 1 hour or up to 6 hours will be below the AEGL-1 value at locations within 100 m of the fire (and by definition at lower concentrations further afield due to dispersion of pollutants). In most instances the AEGL-1 value would be achieved within the Order limits and in all cases in a shorter distance than that to the nearest sensitive receptors. Consideration of evacuation procedures will form part of the emergency response within the Outline Battery Fire Safety Management Plan [APP-267] during the detailed design stage of the Scheme.
RR-0057, RR-0111, RR-0117, RR-0141, RR-0142, RR-0164, RR-0167, RR-0210, RR-0274, RR-0322, RR-0328, RR-0417, RR-0446, RR-	Fire risk	There are examples of BESS fires from around the world and they have been banned in some countries.	There is no current UK legislation that the Applicant is aware of which prohibits the installation of a BESS. According to the UK Government renewable energy planning database, there are several Battery Energy Storage System projects currently under construction or operational. The Outline Battery Fire Safety Management Plan [APP-267] has considered research on fire tests as well as lessons learned from BESS fires.

Parties	Issue	Summary of issue raised	Applicant's response
0607, RR-0613, RR-0659, RR-0871, RR-0882, RR-0889, RR-0983, RR-1015, RR-1057, RR-1070, RR-1124, RR-1155			
RR-0004, RR-0005, RR-0006, RR-0009, RR-0018, RR-0024, RR-0038, RR-0042, RR-0047, RR-0057, RR-0069, RR-0073, RR-0099, RR-0103, RR-0106, RR-0122, RR-0123, RR-0130, RR-0136, RR-0138, RR-0141, RR-0148, RR-0199, RR-0210, RR-0220, RR-0252, RR-0266, RR-0229, RR-0284, RR-0289, RR-0322, RR-0335, RR-0446, RR-0449, RR-0488, RR-0532,	Fire risk	The fire safety plan included for the BESS is inadequate - further risk assessments must be undertaken.	The Applicant respectfully disagrees. The Outline Battery Fire Safety Management Plan [APP-267] has been prepared in consultation with the local fire services and is a comprehensive review of the potential risk. As stated in the document, it will be updated during each stage of the Scheme lifecycle to ensure all potential risks are identified.

Parties	Issue	Summary of issue raised	Applicant's response
RR-0533, RR-0563, RR-0565, RR-0566, RR-0617, RR-0623, RR-0624, RR-0635, RR-0639, RR-0648, RR-0654, RR-0665, RR-0672, RR-0676, RR-0682, RR-0713, RR-0716, RR-0727, RR-0764, RR-0773, RR-0786, RR-0797, RR-0798, RR-0825, RR-0831, RR-0847, RR-0850, RR-0882, RR-0890, RR-0912, RR-0922, RR-0937, RR-0942, RR-0958, RR-0975, RR-0976, RR-0982, RR-0983, RR-1015, RR-1016, RR-1018, RR-1022, RR-1028, RR-1034, RR-1037, RR-1040, RR-1057, RR-1061,			

Parties	Issue	Summary of issue raised	Applicant's response
RR-1066, RR-1069, RR-1078, RR-1086, RR-1109, RR-1112, RR-1120, RR-1211, RR-1124, RR-1125, RR-1128, RR-1130, RR-1143, RR-1150, RR-1164, RR-1167, RR-1168, RR-1186, RR-1196, RR-1203, RR-1206, RR-1211, RR-1224, RR-1230, RR-1234, RR-1285, RR-1286, RR-1287, RR-1317, RR-1321, RR-1323, RR-1329, RR-1336, RR-1337			
RR-0001, RR-0005, RR-0017, RR-0019, RR-0119, RR-0113, RR-0130, RR-0164, RR-0166, RR-0170, RR-0228, RR-0279,	Fire risk	BESS fires cannot be extinguished and are left to burn out.	The Outline Battery Fire Safety Management Plan [APP-267] includes a risk evaluation of the BESS during its life cycle and details the Applicant's proposed measures to reduce any fire risks. In the unlikely event that a fire does occur, the BESS containers are provided with a localised automatic water-based fire suppression system. There is also manual firefighting means provided for the local fire and rescue service to control fire spread and heat radiation exposure to adjacent BESS containers. These control measures are outlined in the Outline

Parties	Issue	Summary of issue raised	Applicant's response
RR-0288, RR-0289, RR-0297, RR-0303, RR-0328, RR-0369, RR-0548, RR-0550, RR-0560, RR-0577, RR-0628, RR-0648, RR-0676, RR-0695, RR-0705, RR-0760, RR-0772, RR-0777, RR-0784, RR-0982, RR-0983, RR-0908, RR-1064			Battery Fire Safety Management Plan [APP-267] in accordance with the advice from the fire and rescue service.
RR-0009, RR-0011, RR-0014, RR-0033, RR-0051, RR-0117, RR-0121, RR-0128, RR-0194, RR-0226, RR-0235, RR-0301, RR-0302, RR-0333, RR-0458, RR-0461, RR-0467, RR-0547, RR-0549, RR-0550, RR-0562, RR-0600, RR-	General	The Scheme will have negative impacts on human health.	The Applicant acknowledges that there would be temporary negative impacts on human health in respect of air quality, noise and neighbourhood amenity, accessibility and active travel, social cohesion and lifetime neighbourhoods during construction/decommissioning, as has been assessed in Chapter 15: Human Health of the Environmental Statement [APP-048] . Mitigation has been identified to minimise these impacts. Following that mitigation, no likely negative residual human health effects have been identified for the Scheme.

Parties	Issue	Summary of issue raised	Applicant's response
0698, RR-0748, RR-0758, RR-0775, RR-0793, RR-0829, RR-0832, RR-0846, RR-0847, RR-0868, RR-0869, RR-0877, RR-0879, RR-0884, RR-0940, RR-0941, RR-1041, RR-1047, RR-1054, RR-1087, RR-1109, RR-1115, RR-1139, RR-1153, RR-1173, RR-1190, RR-1202, RR-1353			
RR-0982, RR-1130	Grid connection	The Burwell substation extension and the cables required for the grid connection could have negative health impacts.	It is assumed that this comment is referring to electromagnetic fields and human health. All items carrying some form of electrical voltage or current are subject to electric and magnetic fields. The impact upon human health of these fields was scoped out of the Environmental Impact Assessment (EIA) in agreement with the Planning Inspectorate at the initial scoping stage undertaken in 2019. This was because it was considered that the proposed Scheme did not present any significant risk to human health through such fields. Public Health England was consulted at this stage and raised no concerns.
RR-0982	Management	Concern as to how the security fencing will be maintained to prevent access.	Security fencing will be maintained during the operation of the Scheme to secure the sites, ensure safety and to prevent theft of the Scheme infrastructure. In line with the wider Scheme, this will be maintained by the operator during the Scheme's operating life.

Parties	Issue	Summary of issue raised	Applicant's response
RR-0001, RR-0007, RR-0011, RR-0014, RR-0017, RR-0018, RR-0024, RR-0029, RR-0047, RR-0051, RR-0059, RR-0075, RR-0078, RR-0098, RR-0135, RR-0143, RR-0169, RR-0194, RR-0213, RR-0230, RR-0243, RR-0250, RR-0251, RR-0273, RR-0286, RR-0343, RR-0376, RR-0425, RR-0433, RR-0450, RR-0506, RR-0514, RR-0524, RR-0538, RR-0546, RR-0547, RR-0585, RR-0624, RR-0640, RR-0652, RR-0659, RR-0674, RR-0681, RR-0695, RR-0709, RR-0733, RR-0737, RR-0738, RR-0745, RR-0777, RR-0779,	Mental health	The Scheme will reduce access to open space and footpaths and have a negative mental health impact for the people who rely on them.	The Scheme would require some short-term closures of PRowWs during construction, which would be a maximum of three weeks duration. Owing to the short duration of any disruption and the ability of users to use the routes themselves otherwise during construction and continue to access open spaces, it is not anticipated that any significant negative impacts would be experienced by users, both in respect of access and mental health by consequence. During the operation phase of the Scheme, new permissive routes will be created as a result of the scheme, providing a beneficial effect for users of PRowWs in the area.

Parties	Issue	Summary of issue raised	Applicant's response
RR-0798, RR-0800, RR-0808, RR-0824, RR-0826, RR-0842, RR-0857, RR-0858, RR-0878, RR-0882, RR-0936, RR-0937, RR-0952, RR-0969, RR-0970, RR-0980, RR-1016, RR-1033, RR-1036, RR-1048, RR-1071, RR-1073, RR-1076, RR-1086, RR-1090, RR-1091, RR-1115, RR-1121, RR-1123, RR-1125, RR-1148, RR-1184, RR-1190, RR-1206, RR-1243, RR-1235, RR-1282, RR-1317, RR-1352, RR-1357, RR-1359			
RR-0036, RR-1230	Mental health	Disruption during construction will have a negative effect on residents' mental health.	The Applicant recognises that construction activity can be disruptive and has the potential to impact upon local communities. The Applicant has assessed the likely impacts of construction within the technical chapters of the Environmental Statement [APP-38 to APP-48] submitted as part of the Applicant's DCO Application. Where significant impacts have been identified,

Parties	Issue	Summary of issue raised	Applicant's response
			the Applicant has proposed mitigation which is outlined in the Framework Construction Environmental Management Plan [APP-123] .
RR-0018, RR-0051, RR-0513	Mental health	The respondent has experienced personal stress as a result of the proposed Scheme.	The Applicant recognises that a large-scale infrastructure project can be disruptive and has the potential to impact upon local communities. The Applicant has assessed the likely impacts of construction, operational and decommissioning phase within the technical chapters of the Environmental Statement [APP-38 to APP-48] submitted as part of the Applicant's DCO Application. Where significant impacts have been identified, appropriate mitigation has been provided to reduce the potential impact.
RR-0189, RR-0809	Pollution	Damage and deterioration of panels would result in significant pollution to the soil and watercourses, impacting on human health.	The solar panels and the steel frames that they are mounted on are not a source of soil or water contamination. As outlined in Chapter 9: Flood Risk, Drainage and Water Resources of the Environmental Statement [APP-041] and the Framework Operation Environmental Management Plan [APP-126] regular visual inspections will be scheduled to ensure the structural integrity of the panels. In this way, any panels which required maintenance / replacement would be removed before there was any leakage of chemicals from the sealed units. The panels are constructed in a robust manner and their components cannot be separated except with a considerable mechanical load. Therefore, the risk of any liquid leakage from the panels is very low, especially in any large quantities.
RR-0053, RR-0902	PV panels	The PV panels include toxic elements which could have a negative impact on human health.	The Scheme will be secured and access to its components will be off-limits to the public, so components of the PV panels will not be accessible. Health issues are therefore not expected to arise as a result. An assessment of the impacts of the Scheme on a range of health determinants is set out in Chapter 15: Human Health of the Environmental Statement [APP-047]. This includes a summary of likely impacts and concludes that where negative impacts arise these can be mitigated, with other impacts assessed as either neutral or positive in respect of human health. The Scheme infrastructure will be carefully monitored by permanent Scheme staff and any damage would be repaired as soon as possible. Measures to avoid and mitigate effects during operation will be included within the Operation Environmental Management Plan (OEMP). This document will be based on the

Parties	Issue	Summary of issue raised	Applicant's response
			Framework OEMP provided in Appendix 16F of the Environmental Statement [APP-126]. The design will ensure that the compounds and solar equipment are secure to minimise the potential for damage to occur through criminal activity. Embedded mitigation will include fencing, CCTV cameras and lighting in critical areas. These are described in further detail in Chapter 3: Scheme Description of the Environmental Statement [APP-035]. There will also be a commissioning phase of testing undertaken prior to the operation phase to ensure that all equipment is operating correctly. It is anticipated that there will be 17 permanent operations staff present on site during the day; this will allow faster responses to an intruder security alert or damage than other solar farms in the UK, which are traditionally unmanned.
RR-0539, RR-0607, RR-0982	Regulation	The Health and Safety Executive should assess the health and safety impacts of the Scheme. The Scheme should be registered with COMAH.	The COMAH Regulations are applicable to any establishment storing, or otherwise handling, large quantities of chemicals or substances of a hazardous nature. The Scheme will not require the storage or handling of large quantities of chemicals and therefore, the COMAH Regulations are not applicable to the Scheme.
RR-0512, RR-0813, RR-1102	Safety	The risk of horses being spooked by the Scheme constitutes a risk to life for riders.	The impact on Non-Motorised Users (NMUs), which includes horse riders on the local road network and PROW, are set out in Chapter 13: Transport and Access of the Environmental Statement [APP-045]. It is not considered the Scheme will have a significant environmental impact on NMUs (and therefore horse riders) during the construction period as a result of the construction staff vehicles or HGVs. The potential effects of glint and glare from the panels during operation has been assessed. Horse training facilities within 1km of the Order limits have been assessed as part of the Glint and Glare Assessment presented in Appendix 16A of the Environmental Statement [APP-121] and summarised in Chapter 16: Other

Parties	Issue	Summary of issue raised	Applicant's response
			Environmental Topics of the Environmental Statement [APP-048]. Sample receptor points were taken at the six identified facilities: a. Snailwell Gallops b. British Racing School c. Limekilns Gallops d. Godolphin Stables e. Bury Hill Gallops f. Long Hill Gallops The Glint and Glare Assessment concluded that reflections from the PV panels to the receptors (including pedestrians and riders using PRow) during operation will either not be geometrically possible or will be sufficiently screened by the existing vegetation and landform, as well as the proposed planting for the Scheme illustrated on Figures 3-1 and 3-2 of the Environmental Statement [APP-135] [APP-136] and described in the Appendix 10I: Landscape and Ecology Management Plan of the Environmental Statement [APP-108]. No health impacts or long-term significant effects are considered to arise on equestrian users on bridleways or horses in training facilities. On this basis, these receptors were not assessed further in Chapter 11: Noise and Vibration of the Environmental Statement [APP-043]. However, horses may be startled by sudden high levels of construction noise. Consequently, engagement will be undertaken with equestrian groups on scheduling of construction activities with potential for generating high levels of noise in the vicinity of public rights of ways or other highways frequently used by horse riders. This commitment to consultation will be secured in the Construction Environmental Management Plan.

3.17 Glint and Glare

3.17.1 24 individual comments were received in relation to glint and glare.

Applicant's responses to RRs relating to glint and glare

Parties	Issue	Summary of issue raised	Applicant's response
RR-0088, RR-0419, RR-0550, RR-0786, RR-0819, RR-1107	Impact on aviation	There is a risk that glint and glare will affect aircraft using RAF Mildenhall and RAF Lakenheath.	The proximity of RAF Mildenhall and RAF Lakenheath to the Scheme has been considered and assessed as part of the Glint and Glare Assessment presented in Appendix 16A of the Environmental Statement [APP-121] and summarised in Chapter 16: Other Environmental Topics of the Environmental Statement [APP-048]. RAF Mildenhall and RAF Lakenheath are located approximately 2.5km and 10km to the north-east of the Scheme respectively. RAF Lakenheath was assessed and considered to be too far away from the Scheme and the orientation of the runway unsuitable to result in any glint and glare impacts. Reflections have been assessed to not be geometrically possible from the PV panels within the Scheme to the runway at RAF Mildenhall, due to the orientation of the runway and the approach of aircraft to the aerodrome.
RR-0982	Impact on aviation	The DIO should be consulted to ensure there is no impact from glint and glare on aircraft using RAF Mildenhall and RAF Lakenheath.	The Ministry of Defence (MOD) has been consulted as part of EIA Scoping and the statutory consultation. In its Relevant Representation, the MOD confirmed that it has reviewed the proposals and the associated documentation from an air safety safeguarding perspective and can confirm, after performing the appropriate technical assessments, that it has no objections to raise at this time.
RR-1274	Impact on aviation	We have reviewed the proposals and the associated documentation from an air safety safeguarding perspective and can confirm, after performing the appropriate technical assessments, that we	This comment is noted.

Parties	Issue	Summary of issue raised	Applicant's response
		have no objections to raise at this time.	
RR-1274	Impact on aviation	Any variation of the parameters (which include the location, dimensions, form, and finishing materials) detailed may significantly alter how the development relates to MOD safeguarding requirements and cause adverse impacts to safeguarded defence assets or capabilities. In the event that any amendment, whether considered material or not by the determining authority, is submitted for approval, the MOD should be consulted and provided with adequate time to carry out assessments and provide a formal response.	This comment is noted. The MoD has been consulted as part of the non-statutory consultation for the proposed changes to the Scheme post-submission of the Application.
RR-0512, RR-0573, RR-0698, RR-0917, RR-0999, RR-1128, RR-1146	Impacts on equestrians	There is a risk of injury to horses spooked by glint and glare from the PV panels, particularly in the morning.	The potential effects of glint and glare from the panels during operation has been assessed. Horse training facilities within 1km of the Order limits have been assessed as part of the Glint and Glare Assessment presented in Appendix 16A of the Environmental Statement [APP-121] and summarised in Chapter 16: Other Environmental Topics of the Environmental Statement [APP-048]. Sample receptor points were taken at the six identified facilities: a. Snailwell Gallops b. British Racing School c. Limekilns Gallops d. Godolphin Stables e. Bury Hill Gallops

Parties	Issue	Summary of issue raised	Applicant's response
			f. Long Hill Gallops The Glint and Glare Assessment concluded that reflections from the PV panels to the receptors (including pedestrians and riders using PRoW) during operation will either not be geometrically possible or will be sufficiently screened by the existing vegetation and landform, as well as the proposed planting for the Scheme illustrated in Figures 3-1 and 3-2 of the Environmental Statement [APP-135] [APP-136] and described in the Appendix 10I: Landscape and Ecology Management Plan of this Environmental Statement [APP-108]. The Applicant has engaged equine specialists on this matter. The advice received from the equine specialists is that even in the absence of mitigation, it is unlikely a horse would be affected by glare given the location, distance and direction of travel of Limekiln gallops in relation to the solar panels.
RR-0874	Impact on equestrians	There will be glint and glare impacts to the horses training on the Al Bahatri and Limekiln gallops.	The potential effects of glint and glare from the panels during operation has been assessed. Horse training facilities within 1km of the Order limits have been assessed as part of the Glint and Glare Assessment presented in Appendix 16A of the Environmental Statement [APP-121] and summarised in Chapter 16: Other Environmental Topics of the Environmental Statement [APP-048]. Sample receptor points were taken at the six identified facilities: a. Snailwell Gallops b. British Racing School c. Limekins Gallops d. Godolphin Stables e. Bury Hill Gallops f. Long Hill Gallops The Glint and Glare Assessment concluded that reflections from the PV panels to the receptors (including pedestrians and riders using PRoW) during operation will either not be geometrically possible or will be sufficiently screened by the existing vegetation and landform, as well as the proposed planting for the Scheme

Parties	Issue	Summary of issue raised	Applicant's response
			illustrated in Figures 3-1 and 3-2 of the Environmental Statement [APP-135] [APP-136] and described in Appendix 10I: Landscape and Ecology Management Plan of this Environmental Statement [APP-108] . The Al Bahatri Gallops is outside of the 1km study area of the glint and glare assessment and is therefore not anticipated to be at risk from any glint or glare effects.
RR-1128	Impact on equestrians	The impact of glint and glare on horses in training, recreational horse riding, and other outdoor pursuits and land uses is inadequately assessed.	The assessment of effects as presented in the Environmental Statement has taken into account the potential for effects on relevant receptors within the horse racing industry. Within Chapter 12: Socio-economics and Land Use of the Environmental Statement [APP-044], consideration has been given to effects on receptors as businesses that might experience direct land take or indirect impacts such as from traffic or disturbance. This includes Godolphin Gallops and Limekilns Gallops. The assessment concludes that there would be no significant effects on these businesses. Effects on users of public rights of way, which might include equestrian users, have been assessed and again, no significant effects are expected. The potential effects of glint and glare from the panels during operation has been assessed. Horse training facilities within 1km of the Order limits have been assessed as part of the Glint and Glare Assessment presented in Appendix 16A of the Environmental Statement [APP-121] and summarised in Chapter 16: Other Environmental Topics of the Environmental Statement [APP-048]. Sample receptor points were taken at the six identified facilities: - Snailwell Gallops - British Racing School - Limekins Gallops - Godolphin Stables - Bury Hill Gallops - Long Hill Gallops The Glint and Glare Assessment concluded that reflections from the PV panels to the receptors (including pedestrians and riders using PRoW) during operation will

Parties	Issue	Summary of issue raised	Applicant's response
			either not be geometrically possible or will be sufficiently screened by the existing vegetation and landform, as well as the proposed planting for the Scheme illustrated in Figures 3-1 and 3-2 of the Environmental Statement [APP-135] [APP-136] and described in Appendix 10I: Landscape and Ecology Management Plan of this Environmental Statement [APP-108] .
RR-0955	Impact on homes	Glint and glare could affect nearby properties.	Nearby properties have been assessed as part of the Glint and Glare Assessment presented in Appendix 16A of the Environmental Statement [APP-121] . This concluded there will be no significant effects on the majority of nearby residential properties. However, prior to establishment of the proposed landscape planting a moderate effect (significant) is expected upon three dwellings, which will remain until the proposed vegetation screening has established and the reflecting panels are obstructed from view. Once the vegetation planted for screening has established, no significant effects are anticipated and further mitigation is not required. Please refer to the Glint and Glare Assessment in Appendix 16A of the Environmental Statement [APP-121] for further detail.
RR-0356, RR-0859	Impact on leisure uses	Glint and glare could affect the Royal Worlington Golf Club.	The Glint and Glare Assessment presented in Appendix 16A of the Environmental Statement [APP-121] assessed the potential effects on aviation receptors, railway receptors, road receptors, residential dwellings, PRoW, bridleways, permissive paths and horse facilities. The effects of glint and glare on the Royal Worlington Golf Club was not scoped into the assessment because the risk of effects is considered unlikely and should there be any effects, these would be transient and not pose a safety risk to receptors.
RR-0194, RR-1273, RR-1286	Impact on traffic	Glint and glare could hinder road users.	Chapter 16: Other Environmental Topics [APP-048] and Appendix 16A: Glint and Glare Assessment of the Environmental Statement [APP-121] assessed the potential effects from glint and glare on road receptors. No significant effects are predicted for the majority of the roads surrounding the Order limits. However, a section of the A14 adjacent to Sunnica West Site A will have views of the panels for approximately 200m with the theoretical potential for glint and glare. Although the road users would only be in the reflection zone momentarily, this is considered sufficient to result in a potential safety hazard and therefore, without additional mitigation would result in a major effect which is considered significant. To mitigate this effect temporary solid hording will be installed to a height of 2.5m for approximately 300m along the Sunnica West Site A boundary with a high

Parties	Issue	Summary of issue raised	Applicant's response
			percentage of evergreen species planted. The temporary hoarding will be removed once the density and height of vegetation is sufficient to screen the views from the road. With the proposed mitigation the residual effect is considered to be not significant.
RR-0528	Impact on wildlife	Glint and glare could confuse birds.	With reference to Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040], bird species identified as part of the detailed baseline surveys are reported in Tables 8-8, with an assessment of potential impacts undertaken in section 8.9. Where required, the Scheme has delivered appropriate mitigation. Paragraphs 8.8.17-8.8.23 and 8.8.28 set out avoidance and mitigation measures for protected and notable species. The assessment concludes there will be no significant residual effects on birds. There is no evidence that current PV panel technology results in glint and glare effects that could confuse birds.

3.18 Renewable Energy and Climate Change

3.18.1 478 individual comments were received in relation to renewable energy and climate change.

Applicant's responses to RRs relating to renewable energy and climate change

Parties	Issue	Summary of issue raised	Applicant's response
RR-0839	Alternative	If there is genuine interest in creating green energy locally, help us purchase solar panels for our homes.	The Applicant acknowledges that small scale solar schemes have an important role to play in the national effort to achieve net zero by 2050, but such schemes are not a replacement for large scale solar, both are needed to achieve net zero by 2050. The Applicant's Statement of Need [APP-260] provides detail on this and outlines why the Applicant believes that larger scale schemes create greater decarbonisation and economic benefits when compared to multiple smaller solar schemes.
RR-0971, RR-1077, RR-1102,	Assessment	There has been no independent assessment of the Scheme's	The lifecycle GHG impact assessment, as presented in Chapter 6: Climate Change of the Environmental Statement [APP-038], has been carried out by

Parties	Issue	Summary of issue raised	Applicant's response
RR-1124, RR-0073, RR-0240, RR-0982, RR-0244, RR-0245, RR-1128, RR-0825, RR-0487, RR-1136, RR-0825, RR-0113		carbon footprint and the Applicant's claims about it should be challenged.	impartial carbon experts on behalf of the Applicant. The lifecycle GHG impact assessment has been undertaken in line with best practice GHG accounting principles of PAS2080 and in accordance with the IEMA guidance for assessing GHG emissions and evaluating their significance within Environmental Impact Assessment.
RR-0982	Assessment	Formal carbon lifecycle analysis, (CLA), should be used to prove that during their whole lifecycle; construction, operation, decommissioning and disposal/recycling; this installation will actually save more carbon emissions than it creates.	The lifecycle GHG impact assessment undertaken by the Applicant, as presented in Chapter 6: Climate Change of the Environmental Statement [APP-038], has been carried out in accordance with the IEMA guidance for assessing GHG emissions and evaluating their significance within Environmental Impact Assessment. The Scheme is answering an urgent national need for forms of low carbon, renewable energy generation. The GHG intensity of the Scheme compares favourably with the projected grid GHG intensity, as well as with alternative energy generation types, and it is estimated that an additional 957,334 tCO₂e would be emitted to generate the equivalent amount of electricity over the operational lifetime of the Scheme from the projected grid energy mix.
RR-1112, RR-0256, RR-0161, RR-0164, RR-0969, RR-0539, RR-1029	BESS	The BESS may store energy generated by fossil fuels and is therefore not green.	The embodied carbon, transportation emissions and maintenance emissions associated with the BESS have been accounted for within the GHG assessment provided within Chapter 6: Climate Change of the Environmental Statement [APP-038] . The Applicant has made no claim to only store green energy; however, the source of the energy stored within the BESS would not impact the GHG assessment for the Scheme. However, the primary purpose for the BESS is to allow storage of renewable energy generated by the Scheme to enable NGET to balance the electricity demand.
RR-1336	BESS	The BESS will not hold enough electrical charge to justify the length of the grid connection.	The capacity of the BESS is not itself a critical determinant of the length of the grid connection. The Scheme has been designed in such a way as to maximise the use of its grid connection. This accounts for potential energy loss during transmission and is industry standard practice. Having considered the potential

Parties	Issue	Summary of issue raised	Applicant's response
			loss of energy during transmission, the Applicant continues to consider that the Scheme is viable.
RR-0508, RR-0551, RR-0259, RR-0647, RR-0661, RR-0674, RR-0564, RR-0689, RR-0697, RR-0131, RR-0134, RR-0135, RR-0143, RR-0177, RR-0194, RR-0858, RR-0439, RR-0189, RR-0472, RR-0951, RR-0979, RR-0984, RR-1024, RR-1034, RR-1040, RR-1298, RR-1119, RR-1123, RR-1131, RR-1154, RR-1164, RR-0001, RR-0010, RR-0012, RR-0017, RR-0018, RR-0564, RR-0251, RR-0281, RR-0329	Carbon	The Scheme's use of agricultural land will increase the requirement to transport food and have a negative climate impact.	The Scheme has been assessed to have a Major Beneficial effect on Climate (see Chapter 5: EIA Methodology [APP-037] for a definition of the terminology used to describe residual effects). The overall beneficial impact of the Scheme is considered to offset any greenhouse gas emissions during the Scheme's lifetime. The impact of GHG emissions arising as a result of the Scheme on the climate has been assessed within Chapter 6: Climate Change of the Environmental Statement [APP-038]. Britain produces the equivalent of about 60% of domestic consumption and 76% for indigenous food types (crops which can be grown at home), some of which is then exported around the globe. To produce this food, 71% of UK land is dedicated to agriculture, with 72% of this grassland and 26% cropland, the remainder being fallow land (detailed in '<i>How harnessing the sun can help secure our energy and food supplies</i>'; Conservative Environment Network, 2022). In this context, currently 0.08% of all land is taken up by solar farms. This would only increase to just under 0.4% if the UK managed to increase solar coverage to 57.2GW of capacity, which National Grid has forecast for 2035 for the most progressive "Leading The Way" scenario. Therefore, the land to be occupied by the Scheme is not considered to have a material impact on the UK's food supply.
RR-0772	Carbon	Excavations during construction will release carbon from the soil.	The Applicant has considered the potential of the Scheme to impact on carbon sequestration in Chapter 6: Climate Change of the Environmental Statement [APP-038] , which was deemed to represent a temporary beneficial impact.

Parties	Issue	Summary of issue raised	Applicant's response
			The Scheme design includes areas of tree, hedgerow and native grassland planting as part of the landscape and ecological mitigation, which will in turn provide areas of carbon storage.
RR-1335, RR-1116, RR-1353, RR-1119, RR-0525, RR-0531, RR-0538, RR-0553, RR-0559, RR-0560, RR-0249, RR-0256, RR-0259, RR-0260, RR-0629, RR-0640, RR-0647, RR-0657, RR-0669, RR-0569, RR-0689, RR-0705, RR-0605, RR-0178, RR-0194, RR-0195, RR-0905, RR-0884, RR-0854, RR-0442, RR-0836, RR-0444, RR-0286, RR-0288, RR-0479, RR-0492, RR-0498, RR-0981, RR-0405, RR-0429, RR-1023, RR-1033, RR-1121, RR-1158, RR-0078, RR-1004, RR-	Carbon	Importing cheap batteries and PV panels will result in climate impacts.	The lifecycle GHG impact assessment undertaken by the Applicant, as presented in Chapter 6: Climate Change of the Environmental Statement [APP-038], accounts for the transportation of the PV panels and BESS units from China and South Korea, respectively. This is considered to represent a reasonable worst-case scenario. The overall GHG impact over the lifetime of the Scheme is considered to have a Major Beneficial impact on Climate (see Chapter 5: EIA Methodology [APP-037] for a definition of the terminology used to describe residual effects).

Parties	Issue	Summary of issue raised	Applicant's response
1066, RR-1068, RR-1152, RR-0537, RR-0608, RR-0334			
RR-0009, RR-0315, RR-1006, RR-1036, RR-1276, RR-0569, RR-0277 RR-1293, RR-1063, RR-1300, RR-1301, RR-1066, RR-1072, RR-1076, RR-1318, RR-1329, RR-1334, RR-1084, RR-1089, RR-1091, RR-0433, RR-1336, RR-1102, RR-1109, RR-1118, RR-0059, RR-0084, RR-0363, RR-1121, RR-1127, RR-0218, RR-1158, RR-0369, RR-0391, RR-0402, RR-0407, RR-0414, RR-0414, RR-0416, RR-0420, RR-0944, RR-1181, RR-0972, RR-1188, RR-	Carbon	The Scheme will not be carbon neutral.	The lifecycle GHG impact assessment undertaken by the Applicant, as presented in Chapter 6: Climate Change of the Environmental Statement [APP-038], has been carried out in accordance with the IEMA guidance for assessing GHG emissions and evaluating their significance within Environmental Impact Assessment. The overall GHG impact over the lifetime of the Scheme is considered to have a Major Beneficial impact on Climate (see Chapter 5: EIA Methodology [APP-037] for a definition of the terminology used to describe residual effects). While there would be GHG emissions associated with the Scheme, the Scheme is answering an urgent national need for forms of low carbon, renewable energy generation. The GHG intensity of the Scheme compares favourably with the projected grid GHG intensity, as well as with alternative energy generation types, and it is estimated that an additional 957,334 tCO₂e would be emitted to generate the equivalent amount of electricity over the operational lifetime of the Scheme from the projected grid energy mix.

Parties	Issue	Summary of issue raised	Applicant's response
0427, RR-0428, RR-1136., RR-0439, RR-1250, RR-1206, RR-0513, RR-0723, RR-0227, RR-0228, RR-0232, RR-0537, RR-0233, RR-0744, RR-0746, RR-0764, RR-0769, RR-0241, RR-0242, RR-0243, RR-0256, RR-0259, RR-0260, RR-0798, RR-0269, RR-0624, RR-0634, RR-0658, RR-0571, RR-0572, RR-0575, RR-0577, RR-0580, RR-0582, RR-0684, RR-0708, RR-0601, RR-0607, RR-0161, RR-0172, RR-0908, RR-0903, RR-0902, RR-0899, RR-0884, RR-0883, RR-0880, RR-0868, RR-0865, RR-0860, RR-0853, RR-			

Parties	Issue	Summary of issue raised	Applicant's response
0442, RR-0840, RR-0839, RR-0459, RR-0305, RR-1023, RR-1128, RR-0024, RR-0012, RR-0109, RR-0313, RR-0323			
RR-0039, RR-0056, RR-0078, RR-0160, RR-0175, RR-0176, RR-0228, RR-0233, RR-0249, RR-0256, RR-0281, RR-0285, RR-0304, RR-0321, RR-0327, RR-0330, RR-0344, RR-0357, RR-0362, RR-0437, RR-0445, RR-0450, RR-0457, RR-0458, RR-0464, RR-0477, RR-0478, RR-0485, RR-0490, RR-0492, RR-0493, RR-0497, RR-0519, RR-0545, RR-0550, RR-0554, RR-0559, RR-0622, RR-	Carbon	The Scheme will have a large carbon footprint.	The lifecycle GHG impact assessment undertaken by the Applicant, as presented in Chapter 6: Climate Change of the Environmental Statement [APP-038], has been carried out in accordance with the IEMA guidance for assessing GHG emissions and evaluating their significance within Environmental Impact Assessment. The overall GHG impact over the lifetime of the Scheme is considered to have a Major Beneficial impact on Climate (see Chapter 5: EIA Methodology [APP-037] for a definition of the terminology used to describe residual effects). The Scheme is answering an urgent national need for forms of low carbon, renewable energy generation. The GHG intensity of the Scheme compares favourably with the projected grid GHG intensity, as well as with alternative energy generation types, and it is estimated that an additional 957,334 tCO₂e would be emitted to generate the equivalent amount of electricity over the operational lifetime of the Scheme from the projected grid energy mix.

Parties	Issue	Summary of issue raised	Applicant's response
0625, RR-0626, RR-0628, RR-0635, RR-0636, RR-0640, RR-0645, RR-0648, RR-0653, RR-0657, RR-0669, RR-0685, RR-0686, RR-0701, RR-0710, RR-0736, RR-0737, RR-0741, RR-0743, RR-0749, RR-0756, RR-0772, RR-0773, RR-0784, RR-0787, RR-0792, RR-0797, RR-0822, RR-0833, RR-0856, RR-0858, RR-0892, RR-0905, RR-0967, RR-0969, RR-1001, RR-1004, RR-1096, RR-1115, RR-1116, RR-1119, RR-1120, RR-1131, RR-1132, RR-1186, RR-1193, RR-1204, RR-1211, RR-1213, RR-1218, RR-1230, RR-			

Parties	Issue	Summary of issue raised	Applicant's response
1232, RR-1237, RR-1245, RR-1246, RR-1297, RR-1313, RR-1314, RR-1335, RR-1337, RR-0279			
RR-0228, RR-0565	Carbon	The carbon calculation for the scheme must take account of improving technology during the Scheme's operating life.	It is unclear from the comment exactly which technological improvements the stakeholder is referring to, e.g. are they referring to improving solar technology, improving technology in relation to alternative energy generation types, or any other technology improvements that might affect the lifecycle GHG assessment? The lifecycle GHG impact assessment undertaken by the Applicant, as presented in Chapter 6: Climate Change of the Environmental Statement [APP-038], has been carried out in accordance with the IEMA guidance for assessing GHG emissions and evaluating their significance within Environmental Impact Assessment, adopting a reasonable worst-case approach where appropriate. The lifecycle GHG assessment has been undertaken based on the best available data at the time of the assessment, and the applicant recognises that it is not the role of EIA to speculate on what future technology will look like beyond available projections such as the BEIS projected grid GHG intensity factors, which have been considered within the lifecycle GHG impact assessment.

Parties	Issue	Summary of issue raised	Applicant's response
RR-1109	Carbon sequestration	Has the sequestration of carbon capturing crops and trees been adequately taken into consideration?	The Applicant has considered the potential of the Scheme to impact on carbon sequestration in Chapter 6: Climate Change of the Environmental Statement [APP-038], which was deemed to represent a temporary beneficial impact. The Scheme design includes areas of tree, hedgerow and native grassland planting as part of the landscape and ecological mitigation, which will in turn provide areas of carbon storage. Crop vegetation is not considered to sequester carbon due to its temporary nature (i.e. due to annual harvesting). Soil carbon sequestration changes due to changing land use from cropland has not been quantified due to insufficient information about specific baseline land management practices (e.g. manure use and tillage practices) which affect soil carbon sequestration. However, it is assumed soil carbon sequestration of cropland is comparable to that of the grassland that will temporarily replace it. These assumptions are in line with the carbon sequestration values provided for grassland and cropland in the <i>EU Commission Decision of 10 June 2010 on guidelines for the calculation of land carbon stocks for the purpose of Annex V to Directive 2009/28/EC</i> (EU Commission, 2010). Therefore, having considered the carbon sequestration impact of the Scheme, including the carbon sequestration of crops and trees, it has been concluded that the Scheme will not result in a negative carbon sequestration impact. In fact, the carbon sequestration impact of the Scheme is deemed to represent a temporary beneficial impact.
RR-0125, RR-0394, RR-0543, RR-0567	Comment	The Scheme is needed to contribute to the country's net zero targets and tackle climate change.	The Applicant notes this comment.
RR-0169	Comment	Being green also means preserving green spaces.	The landscape within the Order limits is predominantly agricultural land with no or limited public access. Green space in a UK planning context is usually associated with public amenity, for example the Local Green Space designation defined in the National Planning Policy Framework. No land within the Order limits has been identified as green space in this context.

Parties	Issue	Summary of issue raised	Applicant's response
			The Scheme will reinforce the Green Infrastructure network through new planting and management of existing habitats to deliver a range of benefits across the landscape, as set out in the Design and Access Statement (DAS) [APP-264]. Where there are interfaces with public amenity, for example where the Scheme adjoins public rights of way, particular attention has been given to the layout and design of built elements by including, for example, offsets and planting.
RR-0005, RR-0031, RR-0036, RR-0049, RR-0076, RR-0077, RR-0080, RR-0081, RR-0097, RR-0108, RR-0115, RR-0155, RR-0187, RR-0197, RR-0232, RR-0281, RR-0312, RR-0317, RR-0327, RR-0346, RR-0405, RR-0428, RR-0470, RR-0473, RR-0478, RR-0504, RR-0529, RR-0536, RR-0547, RR-0548, RR-0550, RR-0551, RR-0553, RR-0554, RR-0556, RR-0577, RR-0605, RR-0617, RR-0621, RR-0624, RR-	Comment	The proposals are not 'green' and will have a negative environmental impact.	New and enhanced Green Infrastructure is a key feature of the Scheme, providing an attractive and biodiverse landscape framework within which the built elements of the Scheme will be integrated. The design also includes substantial offsets, approximately 30% of the Scheme, for proposed built elements from field boundaries to maximise the effectiveness of existing vegetation in providing visual screening, as illustrated in figures 8 to 13 contained within the Landscape and Ecology Management Plan [APP-108].

Parties	Issue	Summary of issue raised	Applicant's response
0645, RR-0652, RR-0665, RR-0673, RR-0675, RR-0792, RR-0809, RR-0816, RR-0844, RR-0857, RR-0862, RR-0869, RR-0891, RR-0875, RR-0897, RR-0912, RR-0926, RR-0940, RR-0941, RR-1001, RR-1006, RR-1075, RR-1089, RR-1130, RR-1131, RR-1150, RR-1159, RR-1153, RR-1189			
RR-0233, RR-0372, RR-0386, RR-0857, RR-0943, RR-1136	Emissions	Concern about the level of emissions during construction and decommissioning.	The lifecycle GHG impact assessment undertaken by the Applicant, as presented in Chapter 6: Climate Change of the Environmental Statement [APP-038], has been carried out in accordance with the IEMA guidance for assessing GHG emissions and evaluating their significance within Environmental Impact Assessment. The overall GHG impact over the lifetime of the Scheme, which includes the emissions during construction and decommissioning, is considered to have a Major Beneficial impact on Climate (see Chapter 5: EIA Methodology [APP-037] for a definition of the terminology used to describe residual effects). The Scheme is answering an urgent national need for forms of low carbon, renewable energy generation. The GHG intensity of the Scheme compares favourably with the projected grid GHG intensity, as well as with alternative energy generation types, and it is estimated that an additional 957,334 tCO₂e

Parties	Issue	Summary of issue raised	Applicant's response
			would be emitted to generate the equivalent amount of electricity over the operational lifetime of the Scheme from the projected grid energy mix.
RR-1136	Energy generation	Further information is required regarding the BESS capacity in MWh	Sunnica has secured a 500MW bilateral connection agreement (BCA) with National Grid. The BESS capacity will look to optimise the solar PV and the BESS around this BCA. The role of the BESS is to support the PV panels and this is not dependent on the number of PV panels.
RR-1177	Energy generation	It is not clear that the PV panels will generate enough energy to justify the BESS.	The UK has a legal commitment to achieve Net Zero by 2050 and the decarbonisation of UK electricity generation is an essential step to make this achievement. The evidence for this statement is included in the Statement of Need [APP-260], Chapter 2. Chapters 5, 6, 7 and 9 of the Statement of Need describe how significant capacities of low-carbon generation are required to meet future demand and Net Zero commitments; and that large-scale solar generation, including Sunnica Energy Farm and other projects like it, are needed as part of the transition to Net Zero. The UK currently has c.14.5GW of operational solar capacity, and Statement of Need Figure 6-1 demonstrates that UK solar capacity must grow to 70GW by 2050 in order to meet Net Zero. It is the generation of renewable energy which is fundamental to achieving Net Zero, and Sunnica aims to meet that need for generation by developing the principal, solar generation, component of the scheme. The proposed BESS is Associated Development which supports the operation of the principal solar development by providing the ability to store Sunnica's solar generation when it is not needed and releasing it when it is needed. BESS are not generators of renewable energy, but the associated BESS supports the Scheme and UK decarbonisation by preventing wastage of electricity that has been generated by the Scheme and by making available as much energy as possible for those times of higher demand, i.e. when it is needed.
RR-0027	Energy generation	The solar farm will not produce enough energy in the winter months.	Figure 7-1 of the Statement of Need [APP-260] illustrates that the Scheme's proposed location is in an area which benefits from some of the highest year-round incident solar irradiation in Great Britain, and Paragraph 6.4.6 of the Statement of Need [APP-260] concludes that the proposed location is a suitable

Parties	Issue	Summary of issue raised	Applicant's response
			site in relation to Government's view of best practice ratios of land take and installed capacity.
RR-0037, RR-0039, RR-0127, RR-0129, RR-0189, RR-0333, RR-0508, RR-0853, RR-0857	Energy generation	There are more efficient and less damaging ways to generate renewable electricity.	Chapter 9 of the Statement of Need [APP-260] describes how solar is already the cheapest existing form of electricity generation in the UK, and Figure 9-2 shows how solar efficiency has increased over the last 20 years of its development. Figure 9-5 shows that solar is expected to become even cheaper on a lifetime unit cost of generation basis and maintain its position as the cheapest form of electricity generation in the UK over the coming decades. Paragraph 6.4.6 of the Statement of Need [APP-260] demonstrates that the proposed location is a suitable site including in terms of expected irradiation levels. Solar generation is important because it does not release carbon dioxide which is damaging the climate and as such government policy (set out in the 2020 Energy White Paper) is that the electricity generation in the UK will be composed predominantly of wind and solar, and the NPSs conclude that the UK needs sufficient electricity capacity from a diverse mix of technologies and fuels.
RR-0511	Energy generation	The Scheme powers a small number of homes given its large size.	The Statement of Need [APP-260] Chapter 3 highlights the very important contribution which has already been made by solar generation towards decarbonising the UK. Paragraph 6.4.6 of the Statement of Need [APP-260] demonstrates that the proposed location is a suitable site and that the Scheme will make a very significant contribution to Great Britain's need for low-carbon electricity.
RR-0124, RR-0305, RR-0503, RR-0500, RR-0621, RR-0663, RR-0801, RR-1021, RR-1081,	Energy generation	Any benefits in terms of energy price will not be felt locally.	This comment is noted. The Applicant acknowledges that the price of electricity in the UK is set nationally and that localised tariffs relate to transport and other non-energy costs and are charged by individual consumer's chosen electricity suppliers. The Applicant also notes the Government's April 2022 British Energy Security Strategy which was developed in response to rising global energy costs and the UK's exposure to volatile international energy markets. The strategy describes that in order to " <i>get [energy] prices down and keep them there for the long term, we need a flow of energy that is affordable, clean and above all, secure. We need a power supply that's made in Britain, for Britain</i> ". The Scheme

Parties	Issue	Summary of issue raised	Applicant's response
			will deliver against the aims of the British Energy Security Strategy and will therefore have an effect on energy price (as described in Section 9.1 of the Applicant's Statement of Need [APP-260]) which will be felt locally as well as nationally by virtue of the current design of the GB electricity market.
RR-0281, RR-0334, RR-0857, RR-0890	Impact	The Scheme will reap the Earth of finite minerals to achieve a minimal reduction in CO ₂ production. The manufacturing of elements of the Scheme involves pollution.	The Applicant has assessed the greenhouse gas impact across the whole lifecycle of the Scheme. This has been carried out in accordance with the Institute of Environmental Management and Assessment (IEMA) guidance for assessing GHG emissions as part of an Environmental Impact Assessment. During construction and decommissioning, approximately 467,200 tonnes carbon dioxide equivalent (tCO₂e) will be emitted. However, during operations, the Scheme has been assessed to have a major beneficial effect on the climate. It is estimated that an additional 957,334 tCO₂e would be emitted if generating the equivalent amount of electricity from the projected grid energy mix over the Scheme's operational lifetime. Therefore, the emissions from the Scheme during construction and decommissioning are far outweighed by the benefits during operation. The procurement strategy will incorporate environmental and ethical procurement policies to minimise potential environmental impacts associated with the procurement of materials and equipment, whilst also safeguarding the human rights of those working within the supply chain of the Scheme. This requirement will be included within the next iteration of the Outline Skills, Supply Chain and Employment Plan.
RR-1325	Network	There is limited capacity in the NETS for energy generated by the Scheme.	The Applicant has secured an agreement with National Grid to connect to the National Electricity Transmission System at Burwell National Grid Substation. This is described in the Grid Connection Statement [APP-265]. Chapter 8 of the Statement of Need [APP-260] describes aspects of the NETS in the vicinity of the Scheme. It concludes that: the connection of a large-scale solar scheme connected to Burwell National Grid Substation will contribute to national system adequacy and decarbonisation targets

Parties	Issue	Summary of issue raised	Applicant's response
			- connecting a solar scheme at Burwell will enable NGESO to increase the level of dependence they can place on expected renewable generation outturn nationally and would provide a local supply of bulk low-carbon generation to consumers in the local area, especially Cambridge and its surrounding area - the services which (by virtue of its intended scale and direction connection arrangements with the NETS) are mandatory for the Scheme to provide, are likely to be beneficial to NGESO in securing the NETS in the local area - the ancillary services available from a large-scale energy storage asset connected to the NETS, would likely provide significant benefit for NGESO's management of energy balance and system security - co-locating an energy storage asset with a large solar scheme at the Burwell Main substation would also provide a uniquely beneficial asset which will support the ongoing operation of this busy area of the NETS.
RR-0858, RR-1062, RR-1089, RR-1233	Pricing	The Government will not own the energy or the solar farm itself and will be charged peak cost prices.	The Scheme is being developed by private investment and has not asked for Government investment, this is the norm for UK energy infrastructure investment. The energy produced will be sold into the UK power market. Section 9.1 of the Statement of Need [APP-260] describes the functioning of the UK power market, and how the scheme will help to keep electricity costs down for UK consumers.
RR-0154, RR-0164, RR-0241, RR-0243, RR-0342, RR-0432, RR-0896, RR-1034, RR-1070, RR-1229, RR-1245, RR-1287, RR-1308, RR-1318, RR-1335, RR-1337, RR-1341	Pricing	The BESS will be used to rip-off consumers by charging them high prices in the day for electricity bought cheaply at night and stored.	The Applicant disagrees with this statement. Chapter 10 of the Statement of Need [APP-260] describes the important role of integration technologies, such as BESS, to support the deployment of the necessary capacities of renewable electricity generation capacity required to meet the UK's legal Net Zero obligation. Paragraph 10.1.1 of the Statement of Need [APP-260] describes how BESS integration technologies capture energy when it is not useful; dispatch it when it is needed; and provide system services which help integrate renewable assets into the GB energy mix. Table 10-1 of the Statement of Need [APP-260] describes the potential contributions of a storage asset within the Scheme to the GB electricity market, including ancillary service provision. By maximising the use of the renewable electricity generated by the Scheme and by facilitating the wider electricity system to accommodate more renewable electricity, the BESS has the

Parties	Issue	Summary of issue raised	Applicant's response
			potential to exert downward pressure on electricity prices in common with other renewable energy projects.
RR-0334, RR-0858, RR-1062, RR-1089, RR-1233	Pricing	The Scheme will not lead to a reduction in energy pricing.	Section 9.1 of the Statement of Need [APP-260] describes the market mechanism for pricing power in the UK, and illustrates how the deployment of solar (and other low marginal cost renewable energy technologies) works to reduce the cost of electricity. It is also through the delivery of large-scale solar schemes and other low-carbon technologies that the UK will reduce its vulnerability to volatile international prices [British Energy Security Strategy, April 2022].
RR-0124, RR-0305, RR-0334, RR-0500, RR-0503, RR-0621, RR-0663, RR-0801, RR-1021, RR-1081	Pricing	Local residents should receive discounted energy bills.	It will not be possible for the Scheme to provide electricity directly to local residents because the Applicant will not be a licensed electricity supplier. As a holder of an Electricity Generation Licence, the Scheme will export power to the National Electricity Transmission System and will sell power into the wholesale UK electricity market. The Applicant is therefore not able to offer discounted electricity bills directly to residents.
RR-0487	Replacement	How long is a solar panel's useful life before requiring replacement, and how much CO ₂ would be required to replace one solar panel including transport, machines/equipment to reinstall and dispose of the old unit?	Chapter 6: Climate Change of the Environmental Statement [APP-038] has assessed the Greenhouse Gas Emission associated with replacing components during the operational stage. The following annual part replacement rates were applied to the product and transportation emissions: - Modules – 0.2% - PV inverters – 4.4% - BESS inverters – 3.1% - Transformers – 1.8% - Medium voltage (MV) switchgear – 0.8% - Module structures – 0.1% As the emissions associated with maintenance (e.g. plant fuel use, water and energy use, worker transportation and waste management) were not available broken down by asset, it was not possible to apply the part replacement rates to these figures. Instead, the total embodied and transportation emissions estimated for the maintenance phase have been prorated up based on the proportion of

Parties	Issue	Summary of issue raised	Applicant's response
			embodied and transportation emissions during construction (94% share). Therefore, the maintenance emissions estimate accounts for emissions from all associated activities. Total operational GHG emissions equate to approximately 5,733 tCO₂e in the first year of operation, as presented in Table 6-15 of Chapter 6: Climate Change [APP-038]. Annual operational emissions then decrease over time as the grid decarbonises, equating to approximately 208,809 tCO₂e over the 40-year design life. These GHG emissions during operation, however, are far outweighed by the GHG emissions that are avoided and would have been otherwise generated by the projected grid average energy generation if the Scheme did not exist.
RR-0532	Sustainability	There are opportunities to improve the sustainability benefits of the proposals through a more thorough assessment of local needs.	The Scheme is being developed to meet a national need for urgent new low-carbon electricity generation, however local needs have been taken into account wherever possible through the process of design evolution and community consultation. The Scheme has been the subject of a non-statutory pre-application consultation in 2019 and a statutory consultation in late 2020. Further details of the Applicant's consultation activity is given in the Consultation Report [APP-026], this includes an appendix setting out the responses that the Applicant received and the regard that the Applicant had to them in preparing its Application for submission [APP-030]. Following the statutory consultation, the Applicant made a number of changes to the Scheme design after reviewing the responses that it had received: • The total area proposed for solar PV was reduced and the Scheme incorporated greater setbacks from Worlington through the introduction of an additional ecological mitigation area. (ECO3, shown in the parameter plan [APP-135]) • Solar panelling is no longer proposed in the field to the west of Beck Road which now forms the ecological mitigation area ECO2 – this reduced the potential impact on the landscape between Isleham and Freckenham.

Parties	Issue	Summary of issue raised	Applicant's response
			- The size of Sunnica West Site A was also reduced through the removal of land from the Order limits. - The Applicant revised its proposals for permissive routes that will be provided during the operating life of the Scheme. While it is not possible to take all suggestions forward, where the Applicant has not been able to make changes in response to comments received, it has had regard to these comments by explaining why it can't accommodate the change.
RR-0109, RR-0173, RR-0301, RR-0322, RR-0469, RR-0520, RR-0559, RR-1029, RR-1171	Technology	PV panels and batteries are not recyclable and therefore do not count as renewable.	Renewable energy technology is termed 'renewable' when referring to the source of the energy itself. Solar power is a renewable energy source because it uses photons from the sun to create electricity, which is not considered to be a finite resource and is therefore sustainable and renewable.
RR-0015, RR-0101, RR-0126, RR-0309, RR-0378, RR-0385, RR-0508, RR-0520, RR-0552, RR-0836, RR-0858, RR-0881, RR-0887, RR-0893, RR-0910, RR-1080, RR-1084, RR-1109, RR-1125, RR-1132	Technology	PV panels are not efficient in the UK.	Chapter 9 of the Statement of Need [APP-260] describes how solar is already the cheapest existing form of electricity generation in the UK, and Figure 9-2 shows how solar efficiency has increased over the last 20 years. Figure 9-5 shows that solar is expected to become even cheaper on a lifetime unit cost of generation basis, and maintain its position as the cheapest form of electricity generation in the UK over the coming decades. Paragraph 6.4.6 of the Statement of Need [APP-260] demonstrates that the proposed location is a suitable site and the efficient detailed design provides for an asset which is consistent with Government's view of best practice ratios of land take and installed capacity.
RR-0064	Trading	The energy produced will be sold abroad.	The Scheme is a new solar energy farm proposal that would deliver electricity to the National Electricity Transmission System. Section 7.6 of the Statement of

Parties	Issue	Summary of issue raised	Applicant's response
			Need [APP-260] describes that high voltage transmission systems are and will remain important in the UK because they enable the pooling of both generation and demand, which in turn offers a number of economic and other benefits, such as more efficient bulk transfer of power and enabling surplus generation capacity in one area to be used to cover shortfalls elsewhere. Section 10.2 of the Statement of Need [APP-260] describes the important role international interconnectors (cables which allow power to flow across national borders) play in the proper functioning of national and international electricity markets. The Scheme will generate electricity in Britain, for Britain. The interconnectors are owned and operated by other market participants who are independent of this Scheme.

3.19 Economy

3.19.1 516 individual comments were received in relation to the economy.

Applicant's responses to RRs relating to the economy

Parties	Issue	Summary of issue raised	Applicant's response
RR-1206	Assessment	Assessment of loss of long-term agricultural jobs and skills, as well as jobs that support our agricultural industry, has been inadequate.	Chapter 12: Socio-economics and Land Use of the Environmental Statement [APP-044] assessed the loss of agricultural employment as being two temporary jobs with no long-term loss of employment as dynamic farm businesses occupy the Sites that both offer specialist contractor services on third party land and use outside contractors on their own land. On this basis, the assessment is therefore considered to have adequately assessed loss of agricultural jobs and skills.
RR-0008, RR-0013, RR-0024, RR-0035, RR-0045, RR-0064, RR-0100, RR-0107, RR-0134,	Employment	The Scheme will lead to a reduction in employment.	This statement is incorrect. As set out in Chapter 12: Socio-economics and Land Use of the Environmental Statement [APP-044], the Scheme will create short-term employment during the construction and decommissioning phases (1,685 net jobs per year and 242 net jobs per year respectively), and long-term employment in the operational phase (17 net jobs per year).

Parties	Issue	Summary of issue raised	Applicant's response
RR-0146, RR-0177, RR-0189, RR-0250, RR-0267, RR-0320, RR-0322, RR-0409, RR-0432, RR-0520, RR-0552, RR-0575, RR-0580, RR-0587, RR-0701, RR-0712, RR-0741, RR-0743, RR-0746, RR-0784, RR-0834, RR-0858, RR-0881, RR-0887, RR-0889, RR-0912, RR-0944, RR-0945, RR-0952, RR-0972, RR-1019, RR-1108, RR-1096, RR-1115, RR-1116, RR-1204, RR-1230, RR-1236, RR-1323, RR-1326, RR-1336			
RR-0165, RR-0654	Employment	The loss of agricultural land will lead to a reduction in employment.	Agricultural land below and between the solar panels will be grazed by sheep or other small livestock. This agricultural land is retained and not lost. The effect on agriculture employment has been considered within Chapter 12: Socio-economics and Land Use of the Environmental Statement [APP-044] and a net increase in employment overall is anticipated once the new operational employment generated is accounted for.

Parties	Issue	Summary of issue raised	Applicant's response
RR-1230, RR-1234	Employment	There is insufficient clarity about the number of jobs the Scheme will create.	As set out in Chapter 12: Socio-economics and Land Use of the Environmental Statement [APP-044] , the Scheme will create short-term employment during the construction and decommissioning phases (1,685 net jobs per year and 242 net jobs per year respectively), and long-term employment in the operational phase (17 net jobs per year).
RR-0295, RR-0444, RR-0545, RR-0610, RR-0856, RR-0884, RR-0896, RR-1337	Employment	Any jobs created will not benefit local people.	It is anticipated that the majority of the construction and operational workforce will be fulfilled by residents within a 45-minute drive of the site, benefitting local residents.
RR-0024, RR-0105, RR-0117, RR-0154, RR-0160, RR-0172, RR-0176, RR-0189, RR-0197, RR-0205, RR-0225, RR-0227, RR-0255, RR-0281, RR-0288, RR-0297, RR-0303, RR-0322, RR-0334, RR-0380, RR-0409, RR-0427, RR-0431, RR-0432, RR-0438, RR-0444, RR-0466, RR-0476, RR-0479, RR-0490, RR-0493, RR-0500, RR-0513,	Employment	The Scheme will not generate more employment.	The effects on employment of the Scheme are as reported in Chapter 12: Socio-economics and Land Use of the Environmental Statement [APP-044]. This reports that there is a significant temporary beneficial effect arising from the generation of construction and decommissioning employment and from the associated increase in gross value added (GVA) during construction respectively. There would be a net increase in employment during the operation of the Scheme, with the assessment acknowledging that the scale of this would be not significant. The conclusions of the assessment are considered to be sound both on this basis and previous experience. To maximise and expand the economic benefits of the Scheme for the local community an Outline Skills, Supply Chain and Employment Plan [APP-268] has been included in the Application. The Scheme is needed to provide renewable energy in order to contribute to meeting national policies and objectives and commitments for provision of a secure, reliable and zero carbon energy system. The delivery of renewable energy generation capacity in line with these policies, objectives and commitments is the principal benefit of the Scheme and by far the dominant factor weighing in favour of development consent being granted. Whilst the creation of employment opportunities during the operational period is also considered to be another benefit of the Scheme, in the context of the renewable energy generation benefit of the Scheme it makes a comparatively minor contribution to the planning balance. The Applicant considers that even if it was

Parties	Issue	Summary of issue raised	Applicant's response
RR-0521, RR-0524, RR-0529, RR-0534, RR-0537, RR-0545, RR-0554, RR-0565, RR-0601, RR-0607, RR-0646, RR-0657, RR-0658, RR-0659, RR-0662, RR-0687, RR-0693, RR-0744, RR-0747, RR-0744, RR-0747, RR-0785, RR-0828, RR-0839, RR-0855, RR-0856, RR-0886, RR-0899, RR-0904, RR-0956, RR-0967, RR-0971, RR-0991, RR-1004, RR-1019, RR-1033, RR-1077, RR-1089, RR-1090, RR-1095, RR-1115, RR-1118, RR-1132, RR-1143, RR-1148, RR-1152, RR-1186, RR-1197, RR-1202, RR-1204, RR-			determined that the Scheme would not generate employment benefits, a key benefit of the Scheme is energy generation. The Draft National Policy Statement (NPS) for Renewable Energy Infrastructure (EN-3) highlights the role of electricity generation from renewable sources in the transition to net zero, especially with expectations that demand for electricity will increase. The Scheme would therefore be contributing to this powering of an estimated 100,000 homes, with the added benefit of a significant amount of construction employment during the construction phase, as well as a small number of operational jobs created.

Parties	Issue	Summary of issue raised	Applicant's response
1218, RR-1244, RR-1265, RR-1329, RR-1341			
RR-0290, RR-0890	Financing	A massive taxpayer subsidy will be required for the Scheme.	This statement is incorrect and no subsidy is required for the Scheme. The Applicant has included a Funding Statement as part of the DCO application to demonstrate how the project will be funded. Further details regarding the funding of the Sunnica Energy Farm can be found within the Funding Statement [APP-023] submitted as part of the DCO application.
RR-0018, RR-0048, RR-0106, RR-0113, RR-0192, RR-0193, RR-0280, RR-0308, RR-0320, RR-0340, RR-0380, RR-0391, RR-0397, RR-0402, RR-0405, RR-0421, RR-0426, RR-0439, RR-0445, RR-0446, RR-0494, RR-0533, RR-0560, RR-0573, RR-0596, RR-0604, RR-0605, RR-0608, RR-0614, RR-0615, RR-0629, RR-0649, RR-0666, RR-0677, RR-0684, RR-0734, RR-0735, RR-	Horseracing sector	The Scheme will have a negative economic impact through its impact on the attractiveness of the horseracing sector.	The Applicant has had regard to the Newmarket Conservation Area and the cultural heritage of the horseracing industry. It is considered that the Scheme will have no impact on these assets. This includes assessments relating to a number of impacts set out below. The full results of the Applicant's assessments carried out in relation to heritage can be found in Chapter 7: Cultural Heritage of the Environmental Statement [APP-039] submitted as part of the Applicant's DCO application. The Applicant has assessed the impacts of the proposed Scheme including in terms of landscape and visual impact assessment. Further details can be found in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] paragraphs 6.13.15 to 6.13.18. Appendix B of the Planning Statement [APP-261 to APP-263] considers the compliance of the Scheme with the local planning policy that seeks to protect the operational uses of existing horse racing industry sites and the long term viability of the horse racing industry as a whole. The reason Newmarket has established itself as a world leader in both training racehorses and breeding them is primarily the quality of bloodstock, the quality and number of training facilities in a relatively small geographical area and the quality of expertise from trainers to vets etc. Newmarket is unique in the respect that a number of training yards are located in residential areas that surround the town and the High Street. There are also several public gallops, owned by the Jockey Club, and some private gallops which belong to larger racing organisations, although these larger yards also use the public gallops.

Parties	Issue	Summary of issue raised	Applicant's response
0741, RR-0751, RR-0754, RR-0759, RR-0770, RR-0776, RR-0782, RR-0788, RR-0791, RR-0825, RR-0925, RR-0959, RR-0985, RR-0995, RR-0999, RR-1005, RR-1026, RR-1045, RR-1102, RR-1103, RR-1128, RR-1144, RR-1158, RR-1164, RR-1206, RR-1211, RR-1213, RR-1214, RR-1227, RR-1318, RR-1329, RR-1334, RR-1336, RR-1343, RR-1345			This leads to horses moving around Newmarket between yards and gallops via a series of paths and road crossings. HGV traffic associated with the Scheme will not be required to enter Newmarket and therefore will not significantly impact these paths or crossings. In any case, the racing industry in Newmarket already operates with relatively high traffic volumes. Horses tend to be very accepting of the traffic conditions and even though young, horses training in Newmarket tend to be more 'traffic proofed' than perhaps their contemporaries on private yards in more remote locations. In addition, it is unlikely that horses on stud farms would need to use any roads and therefore would not be affected by construction traffic. Sometimes, (older practice) yearlings would be walked 'in-hand' in small groups down quieter country lanes to create a change of environment and get them used to new sights and sounds as part of the 'prepping' process for sales. However, this now mostly happens 'on site' as larger farms have their own roadways/tracks serving paddocks and fields. The Applicant would communicate construction traffic routes and hours. The Applicant engaged the equine specialists regarding the safety of riding a horse on a path with solar panels on both sides. They have advised that although very sensitive animals, horses are remarkably adaptable to the environment which surrounds them. Many horses travel in crates and are flown around the world. These environments not only restrict the horse on both sides, but also overhead as lorries, trailers and shipping crates have roofs. Unless solar panels were positioned very close on either side of a path leaving say two or three metre width for the path (which would not be the case in respect of the Scheme), it would be unlikely that a horse would feel any sense of entrapment. In fact, no more than a horse would feel trapped by hacking down a narrow country lane with high hedges on both sides. The horseracing industry in Newmarket is a very international business and a significant number of investors do not live in Newmarket and mostly come to the public auctions. It is true that some very significant players in the international bloodstock world have 'bases' in Newmarket. Some have houses but usually only visit them once a year for a matter of a few days. The Applicant believes that it is an

Parties	Issue	Summary of issue raised	Applicant's response
			unlikely scenario that investors would 'up sticks' and relocate their entire operation to another location because of a solar farm that is visible from mainly one gallops, as the quality of the training facilities (i.e. the ground surface) and quality of land (grass with excellent nutritional value, free-draining and gentle topography) is what attracts and keeps the industry in Newmarket. As for new investors, they will be attracted to the location for the same reasons given above. In the Applicant's opinion, it would be unlikely that the location of the solar farm would deter new investment in the bloodstock industry in Newmarket.
RR-0006, RR-0009, RR-0013, RR-0014, RR-0018, RR-0024, RR-0028, RR-0032, RR-0036, RR-0039, RR-0049, RR-0053, RR-0058, RR-0068, RR-0074, RR-0078, RR-0089, RR-0099, RR-0117, RR-0120, RR-0122, RR-0123, RR-0130, RR-0135, RR-0138, RR-0161, RR-0194, RR-0195, RR-0199, RR-0249, RR-0251, RR-0254, RR-0262, RR-0288, RR-0291, RR-0301, RR-0322, RR-0324, RR-0327,	Housing	The Scheme will reduce property prices locally.	Impacts on property prices are not a material consideration and therefore should not be a factor which is considered by the Secretary of State when determining the application for development consent. In any event is not the Applicant's experience that solar development impacts negatively upon the value of properties.

Parties	Issue	Summary of issue raised	Applicant's response
RR-0334 RR-0350, RR-0365, RR-0376, RR-0388, RR-0412, RR-0419, RR-0420, RR-0431, RR-0438, RR-0445, RR-0459, RR-0461, RR-0465, RR-0466, RR-0467, RR-0472, RR-0477, RR-0484, RR-0485, RR-0490, RR-0497, RR-0499, RR-0523, RR-0524, RR-0545, RR-0546, RR-0553, RR-0560, RR-0562, RR-0568, RR-0569, RR-0571, RR-0605, RR-0610, RR-0617, RR-0619, RR-0637, RR-0641, RR-0653, RR-0657, RR-0658, RR-0663, RR-0672, RR-0681, RR-0687, RR-0692, RR-0693, RR-0706, RR-0709, RR-0737,			

Parties	Issue	Summary of issue raised	Applicant's response
RR-0738, RR-0744, RR-0758, RR-0759, RR-0762, RR-0767, RR-0773, RR-0777, RR-0785, RR-0800, RR-0808, RR-0818, RR-0823, RR-0848, RR-0852, RR-0856, RR-0858, RR-0865, RR-0884, RR-0847, RR-0885, RR-0895, RR-0924, RR-0937, RR-0958, RR-0967, RR-0976, RR-0977, RR-0985, RR-1012, RR-1023, RR-1033, RR-1044, RR-1047, RR-1061, RR-1071, RR-1075, RR-1076, RR-1087, RR-1097, RR-1111, RR-1114, RR-1115, RR-1127, RR-1130, RR-1132, RR-1143, RR-1148, RR-1152, RR-1158,			

Parties	Issue	Summary of issue raised	Applicant's response
RR-1184, RR-1186, RR-1190, RR-1204, RR-1218, RR-1236, RR-1238, RR-1239, RR-1255, RR-1265, RR-1266, RR-1278, RR-1285, RR-1301, RR-1312, RR-1350, RR-1352, RR-1357, RR-1359			
RR-0208, RR-0356, RR-0601, RR-0859, RR-0967, RR-1068	Impact on local business	Concerned that the Scheme will impact on the revenues and reputation of the Royal Worlington & Newmarket Golf Club.	It is not anticipated that the Scheme will negatively impact on the Royal Worlington and Newmarket Golf Club. There would be no direct-land take from the golf course either temporarily or permanently, and existing vegetation would screen the facilities from the construction activities within Sunnica East Site B, which is adjacent to the golf course. Noise levels would be substantially below the desirable level of 50 dB L _{Aeq,T} for outdoor areas that is stated in BS 8233:2014, and glint and glare effects on the golf course were scoped out on the basis that these would be unlikely. In addition, following the feedback received during statutory consultation, the Applicant has removed the construction site access from Golf Links Road which removes the requirement for HGVs to travel along Golf Links Road during the construction period. It is therefore not anticipated that the construction phase of the Scheme would impact negatively on the revenue and reputation of the Royal Worlington and Newmarket Golf Club.
RR-0573, RR-0999	Impact on local business	The Scheme will result in less investment in the area, including harm to the horse racing industry in Newmarket.	The Applicant respectfully disagrees with this statement. Chapter 12: Socio-economics and Land Use of the Environmental Statement [APP-044] concludes that there would be no significant effects on businesses. There could be potential positive benefits to the area from the Scheme given that solar energy generation involves advanced technology, and that any direct or indirect employment generated by the Scheme might positively impact investment. Also, to maximise and expand the economic benefits of the Scheme for the local community an

Parties	Issue	Summary of issue raised	Applicant's response
			Outline Skills, Supply Chain and Employment Plan [APP-268] has been included in the Application. The horseracing industry in Newmarket is a very international business and a significant number of investors do not live in Newmarket and mostly come to the public auctions. It is true that some very significant players in the international bloodstock world have 'bases' in Newmarket. Some have houses but usually only visit them once a year for a matter of a few days. The Applicant believes that it is an unlikely scenario that investors would 'up sticks' and relocate their entire operation to another location because of a solar farm that is visible from mainly one gallops, as the quality of the training facilities (i.e. the ground surface) and quality of land (grass with excellent nutritional value, free-draining and gentle topography) is what attracts and keeps the industry in Newmarket. As for new investors, they will be attracted to the location for the same reasons given above. In the Applicant's opinion, it would be unlikely that the location of the solar farm would deter new investment in the bloodstock industry in Newmarket.
RR-1017	LGC Campus	The permanent and unrestricted rights of access sought over the LGC Campus are likely to cause severe impacts on the operation of the LGC Campus and/or the delivery of the Campus Expansion generally.	This statement is incorrect. The Scheme will not encroach into the LGC campus beyond a section of the cable route being located in its car park. There will therefore be a period of 45 days where construction activities will take place within the car park to the LGC campus and Sunnica is working with the landowner to ensure that these effects are limited. Once installed it is not anticipated that the cable will cause any disturbance to the LGC campus.
R-0006, RR-0018, RR-0113, RR-0297, RR-0303, RR-0320, RR-0370, RR-0381, RR-0385, RR-0439, RR-0446, RR-0546, RR-0547, RR-0560, RR-0683,	Local economy	The Scheme will harm the local economy.	The Applicant respectfully disagrees with this assessment. The Applicant is committed to providing a legacy of community benefits through the Scheme. This includes a dedicated skills programme designed to provide local people with opportunities to work on an operational solar and battery storage installation. The Applicant is committed to maximising the local economic benefits of the Scheme and will source locally where possible. The Applicant has had regard to feedback received through the statutory consultation which identifies local businesses and opportunities to promote local skills development. The effect on the local community is assessed within Section 12.8 of Chapter 12: Socio-economics and Land Use of the Environmental Statement [APP-044]. The

Parties	Issue	Summary of issue raised	Applicant's response
RR-0693, RR-0745, RR-0767, RR-0780, RR-0791, RR-0991, RR-1029, RR-1082, RR-1092, RR-1144, RR-1181, RR-1296			wider benefits derived from the Scheme are set out within the Planning Statement [APP-261 to 263] . Further information is provided in the Outline Skills, Supply Chain and Employment Plan [APP-268] , the implementation of which is secured by a requirement in Schedule 2 of the DCO.
RR-0006, RR-0018, RR-0113, RR-0297, RR-0303, RR-0370, RR-0381, RR-0385, RR-0439, RR-0446, RR-0546, RR-0547, RR-0560, RR-0683, RR-0693, RR-0745, RR-0767, RR-0780, RR-0791, RR-0991, RR-1029, RR-1082, RR-1092, RR-1144, RR-1181, RR-1296	Local economy	Local businesses will suffer from loss of customers and business and may have to close.	Whilst it is understood that the Scheme is different to what is on the site now, the Applicant does not consider the impact of solar to be negative. The Applicant's Environmental Impact Assessment found there are no businesses that would likely experience significant adverse effects during construction or operation. Chapter 12: Socio-economics and Land Use of the Environmental Statement [APP-044] includes these findings.
RR-0552, RR-0881, RR-0887, RR-0912	Local economy	Construction traffic will deter people from visiting La Hogue Farm Shop.	Chapter 13: Transport and Access of the Environmental Statement [APP-045] has demonstrated that the construction traffic impact of the Scheme will be short term and temporary, and that it will not be significant in EIA terms. This includes in terms of driver delay and highways safety, which the Applicant assumes are the potential impacts that may deter people from visiting the farm shop. Furthermore, road

Parties	Issue	Summary of issue raised	Applicant's response
			widening is proposed on La Hogue Road and Elms Road to enhance the ability for cars to pass HGVs on these sections, limiting the impact on local accessibility.
RR-1271	National economy	The scheme will impose additional costs on the national economy that are not considered in this private scheme - e.g. the need to reinforce the NETS.	Section 9.2 of the Statement of Need [APP-260] illustrates the lifetime costs of electricity generation from solar technology. The chapter draws on public information to conclude that UK-specific estimates of levelised cost of energy from solar have reduced significantly since 2013. Costs are predicted to fall further in the decades ahead, and solar, already being highly competitive against current conventional and renewable generation costs, is predicted to retain a cost advantage for the decades ahead. The National Infrastructure Commission considered whole-system impacts of renewable generation and found that " <i>More renewables do lead to more money being spent to match supply and demand ... But cheaper capital costs are estimated to offset this within the costs for the overall system.</i> " [National Infrastructure Commission. National Infrastructure Assessment Chapter 2: Low Cost, Low Carbon, 2018, p39].
RR-0089, RR-0167, RR-0182, RR-0197, RR-0211, RR-0213, RR-0225, RR-0232, RR-0265, RR-0277, RR-0430, RR-0444, RR-0466, RR-0640, RR-0785, RR-0865, RR-0959, RR-1084, RR-1118, RR-1187, RR-1277, RR-1319, RR-1329, RR-1335	National economy	There are no economic benefits from the Scheme.	The Applicant respectfully disagrees with this assessment. As set out in Chapter 12: Socio-economics and Land Use of the Environmental Statement [APP-044], the Scheme will generate economic benefits. Principally it will create short-term employment during the construction and decommissioning phases (1,685 net jobs per year and 242 net jobs per year respectively), and long-term employment in the operational phase (17 net jobs per year). Construction employment will generate increased gross value added of £58 million of which £51 million is expected to be within the 45 minute travel study area. The Statement of Need [APP-260] clearly articulates the fundamental need for large-scale solar generation in the UK in order for the UK to meet its legally binding climate change targets. The case for need is built upon the contribution of the Scheme to the three important national policy aims of Net Zero and the importance of deploying zero-carbon generation assets at scale; security of supply (geographically and technologically diverse supplies); and affordability of electricity supplies.

Parties	Issue	Summary of issue raised	Applicant's response
			Section 9.1 of the Statement of Need [APP-260] describes the market mechanism for pricing power in the UK, and illustrates how the deployment of solar (and other low marginal cost renewable energy technologies) works to reduce the cost of electricity. It is also through the delivery of large-scale solar schemes and other low-carbon technologies that the UK will reduce its vulnerability to volatile international prices [British Energy Security Strategy, April 2022]. The Scheme therefore is a critical enabler to UK economic performance through the delivery of reliable, low-carbon and low-cost electricity. Further, the Applicant is committed to providing a legacy of community benefits through the Scheme. This includes a dedicated skills programme designed to provide local people with opportunities to work on an operational solar and battery storage installation. The Applicant is committed to maximising the local economic benefits of the Scheme and will source locally where possible. The Applicant has had regard to feedback received through the statutory consultation which identifies local businesses and opportunities to promote local skills development. The effect on the local community is assessed within Section 12.8 of Chapter 12: Socio-economics and Land Use of the Environmental Statement [APP-044]. The wider benefits derived from the Scheme are set out within the Planning Statement [APP-261 to 263]. Further information is provided in the Outline Skills, Supply Chain and Employment Plan [APP-268], the implementation of which is secured by a requirement in Schedule 2 of the DCO.
RR-0567, RR-1165	Ownership	The Scheme should be a joint venture with local authorities, allowing profits to be shared with the local community.	The Applicant considers that the local authorities are free to pursue a project of this kind if they wish. The Applicant is bringing forward the Scheme at its own cost and has included a Funding Statement as part of the DCO application to demonstrate how the project will be funded. Further details regarding the funding of the Sunnica Energy Farm can be found within the Funding Statement [APP-023] submitted as part of the DCO application.
RR-0089, RR-0246, RR-0430, RR-0492, RR-0537, RR-0549, RR-0553, RR-	Procurement	Components used as part of the Scheme should be manufactured in the UK and not sourced from other countries, such as China.	A procurement process will be run ahead of construction to source all of the equipment and labour required for the construction of the Scheme and following the final design of the Scheme. Where possible, equipment and labour will be sourced locally. A requirement in Schedule 2 of the DCO will secure the implementation of a Skills, Supply Chain and Employment Plan to help identify opportunities for

Parties	Issue	Summary of issue raised	Applicant's response
0565, RR-0580, RR-0610, RR-0785, RR-0812, RR-0816, RR-0822, RR-0840, RR-0967			individuals and businesses to access employment and supply chain opportunities associated with the construction, operation and maintenance of the Scheme. The Applicant has provided an Outline Skills, Supply Chain and Employment Plan [APP-268] as part of its DCO application. However, it is likely there will be instances where this is not possible as the equipment is best sourced from other countries owing to the lack of manufacturing capacity in the United Kingdom. The procurement strategy will incorporate environmental and ethical procurement policies to minimise potential environmental impacts associated with the procurement of materials and equipment, whilst also safeguarding the human rights of those working within the supply chain of the Scheme. This requirement will be included within the next iteration of the Outline Skills, Supply Chain and Employment Plan.
RR-0295, RR-0430, RR-0444, RR-0545, RR-0610, RR-0856, RR-0884, RR-0896, RR-1337	Procurement	The Scheme will not be delivered by local companies.	The Applicant has prepared an Outline Skills, Supply Chain and Employment Plan [APP-268] , the implementation of which is secured by a requirement in Schedule 2 of the DCO. The outline plan includes details of employment opportunities during both construction and operations and sets out proposals that the final version of the plan will contain a dedicated skills programme to identify opportunities for local companies to access employment.
RR-0189, RR-1206	Procurement	Inadequate information about the supply chain for the Scheme means it is impossible to guarantee that it will be built.	The Applicant has prepared an Outline Skills, Supply Chain and Employment Plan [APP-268] , the implementation of which is secured by a requirement in Schedule 2 of the DCO. The outline plan includes details of employment opportunities during both construction and operation and provides that the final version of the plan will contain a dedicated skills programme to identify opportunities for individuals to access employment.
RR-1235	Services	The Scheme will strain local services such as shops.	The Applicant acknowledges the concern. It is anticipated that local services such as shops can benefit from the expenditure from construction workers in the construction phase of the Scheme.
RR-0391, RR-0446, RR-0512, RR-0520, RR-0560, RR-0614, RR-0825, RR-0969, RR-0995,	Tourism	Negative landscape impacts will deter tourism.	Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] acknowledges that there will be some adverse landscape effects due to a reduction in openness of the landscape locally and visual effects on users of the limited number of public rights of way in the area during construction and operation. The LVIA has considered visual receptors (people) likely to have views of the Scheme.

Parties	Issue	Summary of issue raised	Applicant's response
RR-1128, RR-1144, RR-1299, RR-1334, RR-1343			Mitigation is proposed, including planting to assist in integrating the Scheme into the existing landscape pattern and for visual screening and the provision of permissive public recreation routes to enhance access to the countryside, as shown in Figures 10-14a to 10-14f of the Environmental Statement [APP-209 to APP-214]. Also, in respect of impacts on tourism from a socio-economic perspective, effects were scoped out of the Environmental Impact Assessment on the basis that no likely significant effects were anticipated.

3.20 Planning

3.20.1 158 individual comments were received in relation to planning.

Applicant's responses to RRs relating to planning

Parties	Issue	Summary of issue raised	Applicant's response
RR-0009, RR-0014, RR-0024, RR-0039, RR-0061, RR-0074, RR-0078, RR-0089, RR-0111, RR-0127, RR-0134, RR-0154, RR-0167, RR-0168, RR-0172, RR-0189, RR-0199, RR-0206,	Community benefit	There are no community benefits from the Scheme.	The Applicant is committed to providing a legacy of community benefits through the Scheme. This includes a dedicated skills programme designed to provide local people with opportunities to work on an operational solar and battery storage installation. The Applicant is seeking to maximise the local economic benefits of the Scheme and will source locally where possible. The Applicant has had regard to feedback received through the statutory consultation which identifies local businesses and opportunities to promote local skills development. The effect on the local community is assessed within Section 12.8 of Chapter 12: Socio-economics and Land Use of the Environmental Statement [APP-044]. The wider benefits derived from the Scheme are set out within the Planning Statement [APP-261 to 263]. Further information is provided in the Outline Skills, Supply

Parties	Issue	Summary of issue raised	Applicant's response
RR-0225, RR-0301, RR-0311, RR-0315, RR-0334, RR-0442, RR-0450, RR-0476, RR-0479, RR-0493, RR-0496, RR-0502, RR-0503, RR-0518, RR-0519, RR-0529, RR-0530, RR-0538, RR-0539, RR-0553, RR-0554, RR-0567, RR-0569, RR-0582, RR-0601, RR-0605, RR-0642, RR-0645, RR-0658, RR-0661, RR-0662, RR-0669, RR-0675, RR-0700, RR-0701, RR-0720, RR-0744, RR-0764, RR-0772, RR-0775, RR-0825, RR-0833, RR-0835, RR-0839, RR-0844, RR-0848, RR-0850, RR-0855, RR-0858, RR-0868, RR-0875,			Chain and Employment Plan [APP-268] , the implementation of which is secured by a requirement in Schedule 2 of the DCO.

Parties	Issue	Summary of issue raised	Applicant's response
RR-0884, RR-0889, RR-0896, RR-0904, RR-0906, RR-0935, RR-0939, RR-0944, RR-0971, RR-0972, RR-0976, RR-0987, RR-0991, RR-1001, RR-1033, RR-1067, RR-1077, RR-1079, RR-1081, RR-1086, RR-1109, RR-1115, RR-1125, RR-1118, RR-1128, RR-1136, RR-1143, RR-1148, RR-1152, RR-1166, RR-1186, RR-1224, RR-1231, RR-1240			
RR-0963	Community benefit	The financial benefits to the community must be very substantial and proportionate to the size of the Scheme £5k/MW/yr.	The Applicant notes this statement and is exploring a number of different options relating to community benefits and recognises the importance of providing such benefits to the community living and working in the area around the Scheme. The Applicant will advance these proposals further in consultation with the community in the event that the Scheme receives development consent.
RR-0009, RR-0164, RR-0648, RR-0725, RR-0797, RR-0825, RR-0976, RR-	Consents required	The BESS should be the subject of a separate planning application.	The BESS is proposed as Associated Development. This is explained by paragraphs 3.2.3 to 3.2.10 of Planning Statement Part 1 [APP-261] which sets out at paragraph 3.2.8 that the BESS will support the operation of solar PV generating station by storing electricity produced during times of peak capacity until it needs to be released. This increases the efficiency of the solar PV generating station; aiding

Parties	Issue	Summary of issue raised	Applicant's response
1109, RR-1128, RR-1246			both its operation as a generating station and the export of electricity to the national grid.
RR-0021	DCO process	Councils are not competent to assess the danger of battery storage.	The Cambridge Fire and Rescue Service, Suffolk Fire and Rescue Service and the Health and Safety Executive have been consulted by the Applicant's technical experts in the development of the Outline Battery Fire Safety Management Plan [APP-267] . Consultation will continue during each stage of the project lifecycle.
RR-0228	DCO process	Planning permission would never usually be granted for the BESS under normal circumstances.	The BESS is proposed as Associated Development. This is explained by paragraphs 3.2.3 to 3.2.10 of Planning Statement Part 1 [APP-261] which sets out at paragraph 3.2.8 that the BESS will support the operation of solar PV generating station by storing electricity produced during times of peak capacity until it needs to be released. This increases the efficiency of the solar PV generating station; aiding both its operation as a generating station and the export of electricity to the national grid.
RR-0896	DCO process	It's not fair that people who don't live in the area will get to decide whether it goes ahead or not.	The planning process for Nationally Significant Infrastructure Projects (NSIPs) is thorough and gives significant weight to local views during the pre-application, Acceptance, Examination and decision phases.
RR-0614	Local planning policy	The Scheme contravenes the Newmarket Local Plan due to its impact on local views.	There is no Newmarket Local Plan. It is assumed that this comment intends to refer to the Newmarket Neighbourhood Plan and in particular the key views identified by Policy NKT2. Paragraph 5.4.9 of Planning Statement Part 1 [APP-261] sets out that given the Scheme's proximity to Newmarket and the Newmarket Neighbourhood Plan Area, the plan's policies have been considered, where relevant. Table 3 of Appendix B of Planning Statement Part 1 [APP-261] states that the Scheme is not anticipated to affect any of the views designated as Key Views in this policy. Policies Map 4 of the Newmarket Neighbourhood Plan shows the key views identified by the Newmarket Neighbourhood Plan. These are all distant from the Scheme and mostly concern the urban environment of Newmarket. The most notable exception to this is view 41 (also referred to as view 'xli'), 'The panoramic view from Warren Hill, looking N to SW across the Plan Area'. This is located to the east of Newmarket.

Parties	Issue	Summary of issue raised	Applicant's response
			Figure 10-11D of the Environmental Statement [APP-204] , 'With Barriers Zone of Theoretical Visibility Sunnica West Site A and Site B' shows that the Scheme would not be visible from any of the key views identified by Policy NKT2 of the Newmarket Neighbourhood Plan, including from view 41/xli. Additional ZTVs have been prepared based on an observer height equivalent to a horse rider of 2.7m above ground level (Figures 1a to 1f) (Appendix C of this Relevant Representation response document). These ZTVs also show that the Scheme would not be visible from any of the key views identified by Policy NKT2 of the Newmarket Neighbourhood Plan, including view 41/xli.
RR-0615, RR-0999, RR-1234	Local planning policy	The scheme is not included in the Local Plans of the relevant host authorities	The Host Authorities do not allocate land in their local plans for energy generation development. It is also noted that the development plan system does not generally allocate land for all land uses. Residential and employment are exceptions in being subject to allocations. The Host Authorities support the principle of renewable energy development. The Forest Heath District Council Core Strategy (2010) [now part of the West Suffolk Council Development Plan] sets out that the following. • The lack of renewable energy contributing to the National Grid being produced within the District is an issue facing the District (Table below paragraph 2.2.1). • An increase in renewable energy generation is part of the vision for the District (text box below paragraph 2.3.2). • Promotes a diverse range of renewable energy schemes whilst protecting landscapes and quality of life (Spatial Objective ENV3). • Sets out that schemes providing renewable energy are amongst the types of development that may take place outside of a settlement boundary. Policy ENV6 of the East Cambridgeshire Local Plan supports the principle of renewable energy development.
RR-0982	Local planning policy	The Scheme is not compliant with policy ENV 6 or policy ENV 9 of	The Planning Statement Part 1 [APP-261] sets out an analysis of compliance with planning policy that is likely to be considered important and relevant to the Secretary of State's determination of the DCO application. This includes policies

Parties	Issue	Summary of issue raised	Applicant's response
		the East Cambridgeshire Local Plan (2015).	ENV6 and ENV9 of the East Cambridge District Local Plan. This concludes that the social, economic and environmental benefits of the Scheme clearly and substantially outweigh its impacts and the Scheme is therefore in accordance with these policies.
RR-0009, RR-0336	National policy	The Scheme does not fulfil the Government's Ten Point Plan.	It is assumed that this comment concerns the Government's 'Ten Point Plan for a Green Industrial Revolution', November 2020. The Scheme is consistent with the 'Ten Point Plan', seeking to help meet the same objectives <i>"...to reduce UK emissions by 180 million tonnes of carbon dioxide equivalent (Mt CO₂ e) between 2023 and 2032, equal to taking all of today's cars off the road for around two years"</i>. The 'Ten Point Plan' also sets out that the Government will <i>"...support up to twice the capacity of renewable generation in the next CfD [Contract for Difference] round, with onshore wind and solar projects eligible to bid for CfD contracts"</i>. The Statement of Need [APP-260] explains why large-scale ground mounted solar developments are needed as part the energy mix in order for the government's objectives and commitments for a secure, reliable, affordable and net zero energy system to be met. Paragraph 3.3.21 of Draft NPS EN-1 sets out that, along with wind, the government expects solar to form the majority of generation capacity in a net zero, secure and cost-efficient energy system: <i>"Wind and solar are the lowest cost ways of generating electricity, helping reduce costs and providing a clean and secure source of electricity supply (as they are not reliant on fuel for generation). Our analysis shows that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar"</i>.
RR-1102, RR-1237	National policy	The Scheme will set a negative precedent in allowing the use of agricultural land for development.	Each planning or DCO application is required to be decided on its own merits, in accordance with the applicable policy framework.

Parties	Issue	Summary of issue raised	Applicant's response
			Section 6.12 of the Planning Statement Part 1 [APP-261] presents an appraisal of the Scheme with relevant policy regarding the impact of the Scheme on agricultural land. It concludes that the use of agricultural land within the Order limits is justified. On completion of decommissioning of the Scheme, the DCO will cease to have effect and the extant use of the land will return to its status before the Scheme commenced. The site will remain in agricultural use throughout the development, grazing sheep or other small livestock. At the end of the consent period the solar farm will be decommissioned and the current arable land use can resume. Any subsequent proposal for development would be subject to planning consent, just as with any other agricultural land.
RR-0982	National policy	The NPPF considers that renewable energy projects should be part of the local plan process. The project does not meet this requirement.	As a NSIP by virtue of its generation capacity exceeding 50 MW, the Scheme is expressly removed from the development plan process and is required to be determined within the NSIP regime. The Energy NPSs are the primary policy reference for energy DCO applications, rather than the local Development Plan (albeit the local Development Plan can still be important and relevant to the Secretary of State's decision). In any case, the NPPF does not state that 'renewable energy projects should be part of the local plan process'. It says at paragraph 155 that: <i>"To help increase the use and supply of renewable and low carbon energy and heat, plans should:</i> <i>a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts);</i> <i>b) consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development..."</i>

Parties	Issue	Summary of issue raised	Applicant's response
			The above does not mean that renewable energy projects can only take place on land allocated for that purpose. The Host Authorities have not allocated any land for renewable energy generation. The Applicant and the Scheme have no power over the Local Plan making process. It is also noted that the development plan system does not generally allocate land for all land uses. Residential and employment are exceptions in being subject to allocations.
RR-0982, RR-1128, RR-1206	National policy	The NPPF considers that renewable energy projects should not cause cumulative landscape or visual effects. The project does not meet this requirement.	Paragraph 155 of the NPPF sets out that local plans should provide a positive strategy for energy from renewable energy sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts). As set out by the Planning Statement Part 1 [APP-261], the landscape and visual impact of the Scheme, taking account of cumulative effects, has been assessed by Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042], and that the effects have been satisfactorily addressed. Paragraph 7.1.9 of the Planning Statement concludes that: <i>“With regard to landscape and visual amenity the Applicant has carefully designed the Scheme to ensure landscape and visual impacts are minimised through a green infrastructure led landscape and ecological design and increased connectivity and local access through the landscape. In terms of the planning balance, the fact that these effects are localised; will be reversed following the 40 year operational period; and that NPS EN-1 and Draft NPS EN-1 acknowledge that adverse effects are likely, given the scale of energy NSIPs, the national benefits of the Scheme outweigh these localised effects.”</i> It is also noted that the NPPF states at Paragraph 5 that “The Framework does not contain specific policies for nationally significant infrastructure projects. These are determined in accordance with the decision making framework in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant”.

Parties	Issue	Summary of issue raised	Applicant's response
			NPS EN-1 and Draft NPS EN-1 acknowledge that all proposed energy infrastructure is likely to have visual effects, stating at paragraphs 5.9.18 and 5.10.20, respectively, that: <i>"All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites."</i> In addition, NPS EN-1 paragraph 5.9.21 and Draft NPS EN-1 paragraph 5.10.23 establish the principle that the mitigation that would result in a reduction in the scale of a project or a change of design in a way that would reduce the electricity generation output of a proposed project in order to help mitigate landscape and visual effects would only be warranted in <i>"...exceptional circumstances, where mitigation could have a very significant benefit and warrant a small reduction in function"</i>. Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] includes an assessment of cumulative effects with other schemes. Temporary significant adverse effects have been identified as a result of the construction of Grid Connection Route B and Burwell National Grid Substation Extension with other schemes. However, no significant adverse cumulative effects were identified for these scheme elements during operation. No significant adverse effects in combination with other cumulative schemes are anticipated from the main solar PV sites (i.e. Sunnica East and Sunnica West) during construction or operation.
RR-0982	National policy	The NPPF considers that renewable energy projects that are outside of Local Plan boundaries are only acceptable when they have the support of local communities. The project does not meet this requirement.	The NPPF says this explicitly in relation to wind energy development (on Page 46 of the NPPF). The Scheme does not comprise wind energy development.

Parties	Issue	Summary of issue raised	Applicant's response
RR-0578, RR-0825	National policy	The proposals are against the government's own guidance for solar farms.	The Applicant does not know what guidance this representation intends to refer to. The Planning Statement Part 1 [APP-261] sets out an analysis of compliance with policies and guidance that are likely to be considered important and relevant to the Secretary of State's determination of the DCO application.
RR-0951, RR-1070, RR-1177, RR-1137	National policy	The applicant has attached little material weight to national and local planning policies to protect the Best and Most Versatile Land.	The Applicant has presented a detailed ALC assessment of the site which shows that only 4% of the Scheme area is best and most versatile agricultural land. This is an exceptionally low proportion of the site area and a small area in total. Unlike built development, the solar farm consent is temporary with no loss of agricultural land resource and no loss of quality for best and most versatile land. The site will remain in agricultural use, with sheep grazing the pasture below and between solar panels. 96% of the land within Sunnica East sites A and B and Sunnica West sites A and B is classified grades 3b and 4. The use of the remaining 4% which comprises BMV agricultural land is justified by other sustainability considerations. These include the fact that much of that land represents small pockets of BMV land surrounded by lower grade land, and it would not be practicable to exclude it from the Scheme without also excluding larger areas of lower grade land. In addition, the Grade 3a land in the eastern parcel of Sunnica West is highly suitable and productive for solar generation, given its south facing orientation. Draft NPS EN-3 provides clarification and guidance on how policies relating to BMV agricultural land should be interpreted for solar NSIP schemes. It clarifies at paragraph 2.48.15 that the development of solar arrays on BMV agricultural land is not prohibited and that given the scale of NSIP solar projects, the use of some agricultural land is likely. At paragraph 2.48.13 it also sets out that <i>"land type should not be a predominating factor in determining the suitability of the site location"</i>.
RR-0550	National policy	The proposals go against the Government's statement about protecting the countryside.	The Applicant does not know what statement this representation intends to refer to. Section 6.12 of the Planning Statement Part 1 [APP-261] presents an appraisal of the Scheme with relevant policy regarding the impact of the Scheme on agricultural land. It concludes that the use of agricultural land within the Order limits is justified.

Parties	Issue	Summary of issue raised	Applicant's response
RR-0550	National policy	Government Planning, Agricultural, Environment and Energy departments would benefit from working closer together to achieve harmonious carbon neutrality.	This comment is noted.
RR-0028, RR-0029, RR-0134, RR-0189, RR-0293, RR-0825, RR-0827, RR-0850, RR-1005, RR-1103	Planning balance	The construction, operational and environmental impacts of the Scheme outweigh its benefits.	The Applicant has undertaken its own assessment and respectfully disagrees. Section 7 of the Planning Statement Part 1 [APP-261] sets out the conclusion of the Planning Statement and states that: "... <i>whilst it has not been possible to avoid all impacts these have been minimised, where possible, through careful design and detailed mitigation strategies. When considered against the NPS and NPPF, the Scheme accords with relevant policies, and with regard to specific policy tests, the national and local benefits of the Scheme are considered on balance to outweigh its adverse impacts. The Scheme is also considered to be broadly consistent with relevant local planning policy. Therefore, it is considered that development consent for the Scheme should be granted.</i> " Ultimately it will be for the Secretary of State to decide whether the benefits of the Scheme outweigh its impacts.
RR-0166, RR-0582, RR-0827	Planning balance	The proposals do not balance solar energy generation with the loss of agricultural land.	NPS EN-1 and draft NPS EN-1 set out that energy is essential to our ability to produce and transport food, stating at paragraphs 3.2.1 and 2.3.1, respectively, that: "<i>Energy underpins almost every aspect of our way of life. It enables us to heat and light our homes; to produce and transport food...</i>". The Defra 2021 food security report highlights soil degradation and climate change to be among the most significant threats to national food security. The introduction states - "<i>The biggest medium to long term risk to the UK's domestic production comes from climate change and other environmental pressures like soil degradation, water quality and biodiversity. Wheat yields dropped by 40% in 2020 due to heavy rainfall and droughts at bad times in the growing season. Although they have bounced back in 2021, this is an indicator of the effect that increasingly unreliable weather patterns may have on future production.</i>" As well as addressing climate change, the reversion of arable land to grass for 40 years will allow soil health to recover.

Parties	Issue	Summary of issue raised	Applicant's response
			As is reported in the Application (see Table 12.20 of Chapter 12 of the ES [APP-044]), over 96% of the land within Sunnica East Sites A and B and Sunnica West Sites A and B is classified as grades 3b, 4 or not in agricultural use. This means that it is lower quality land, not classified as BMVL. Lower quality agricultural land (in ALC grades 3b, 4 and 5) does not benefit from the same protection as BMVL, with paragraph 5.10.15 of NPS EN1 and paragraph 5.11.14 of Draft NPS EN-1 setting out that in deciding DCO applications, little weight should be given to the loss of poorer quality agricultural land. The use of the remaining 4% which comprises BMVL is justified by other sustainability considerations. These include the fact that much of that land represents small pockets of BMVL surrounded by lower grade land, and it would not be practicable to exclude it from the Scheme without also excluding larger areas of lower grade land. In addition, the Grade 3a land in the eastern parcel of Sunnica West is highly suitable and productive for solar generation given its south facing orientation. Therefore, when weighing the agricultural land resource against the climate crisis, the balance is clearly in favour of the proposed solar renewable energy development.
RR-1289	Protective provisions	National Grid Electricity Transmission (NGET) will require protective provisions to be included within the DCO to ensure that its interests are adequately protected and to ensure compliance with relevant safety standards. NGET is liaising with the Promoter in relation to the protective provisions for inclusion within the DCO along with any supplementary agreements which may be required.	This comment is acknowledged, and the Applicant is working with NGET and seek agreement on protective provisions to be included in the draft DCO.

Parties	Issue	Summary of issue raised	Applicant's response
RR-1290	Protective provisions	National Grid Gas (NGG) will require protective provisions to be included within the DCO to ensure that its interests are adequately protected and to ensure compliance with relevant safety standards. NGG is liaising with the Promoter in relation to the protective provisions for inclusion within the DCO along with any supplementary agreements which may be required. NGG will keep the Examining Authority updated in relation to these discussions. As a responsible statutory undertaker, NGG's primary concern is to meet its statutory obligations and to ensure that any development does not impact in any adverse way upon those statutory obligations.	This comment is acknowledged and the Applicant is working with NGG and seek agreement on protective provisions to be included in the draft DCO.
RR-1142	Policy	There is a notable lack of strategic policy to guide the spatial planning for large scale ground-mounted solar arrays – both at the national and local level.	Sections 5 and 6 of Planning Statement Part 1 [APP-261] set out the planning policy context for the Scheme. This explains that planning policy that is likely to be important and relevant to the Secretary of State's decision includes: - National Policy Statement for Energy, comprising NPS EN-1, NPS EN-3 and NPS EN-5. These came into force in July 2011 and set out the need for new energy NSIPs and infrastructure, including new renewable energy NSIPs. - Draft National Policy Statement for Energy comprising draft NPS EN-1, draft NPS EN-3 and draft NPS EN-5. These were published for consultation in September 2021. They reinforce and update the urgent need for renewable energy NSIPs, including specifically for NSIP scale solar developments.

Parties	Issue	Summary of issue raised	Applicant's response
			In addition, although the NPPF and local planning policy documents do not contain policies specifically relating to NSIP scale development, these too may be important and relevant to the Secretary of State's decision.
RR-0087, RR-0275, RR-0607, RR-0822, RR-0835, RR-1124	Regulation	There is insufficient regulation of battery energy storage in UK law.	Sunnica recognises that there are concerns from the local community in respect of the safety of the battery storage elements of the Scheme. It has therefore developed an Outline Battery Fire Safety Management Plan [APP-267] in consultation with Cambridgeshire Fire and Rescue Service, Suffolk Fire and Rescue Service and Health and Safety Executive. A detailed version of this document will be submitted to and approved by the relevant planning authorities prior to the commencement of development of the energy storage. Sunnica considers that this document should alleviate the concerns of the local community.
RR-1274	Regulation	The application site falls within statutory safeguarding zones encompassing RAF Mildenhall, RAF Lakenheath and Cambridge Airport. These designated safeguarding zones serve to preserve the operation and capability of defence assets and sites.	This comment is noted. The Ministry of Defence (MOD) have been consulted as part of EIA Scoping and statutory consultation. In their Relevant Representation, the MOD confirmed that they have reviewed the proposals and the associated documentation from an air safety safeguarding perspective and can confirm, after performing the appropriate technical assessments, that they have no objections to raise at this time.
AS-013	S106	The applicant has made an omission to include suitable Heads of Terms of Agreement, either via a Section 106 planning obligation or Deed of Obligation - to provide funding & new facilities provision, as required, to increase the capacity, response capability and Project Preparedness for EEAST's staff, vehicle fleet and estate assets to mitigate & manage the impacts arising.	Paragraph 57 of the NPPF sets out that "<i>Planning obligations must only be sought where they meet all of the following tests:</i> <i>a) necessary to make the development acceptable in planning terms;</i> <i>b) directly related to the development; and</i> <i>c) fairly and reasonably related in scale and kind to the development."</i> The Applicant would be pleased to engage with EEAST regarding planning obligations that meet the above tests.

Parties	Issue	Summary of issue raised	Applicant's response
		EEAST, together with both CCGs, is therefore keen to work with Sunnica Ltd to address omissions and agree and secure suitable mitigation and management measures as part of a Section 106 planning obligation (or Deed of Obligation), and reflect this position within a Statement of Common Ground by commencement of (or at an early stage during) the forthcoming Examination.	
RR-0539	Timescale	Any permission to operate beyond 40 years must be made to the local planning authority for approval.	The Applicant is not seeking consent to operate the Scheme for longer than 40 years.
RR-1128, RR-1206	Viability	The Scheme must be proven to be deliverable and economically viable. This has not been demonstrated.	The Applicant considers the Scheme to be viable and does not agree with this assessment. The Applicant has provided information on how it proposes to fund its DCO obligations in the Funding Statement [APP-023] .

3.21 Noise and Vibration

3.21.1 131 individual comments were received in relation to noise and vibration.

Applicant's responses to RRs relating to noise and vibration

Parties	Issue	Summary of issue raised	Applicant's response
RR-0208, RR-0356, RR-0859, RR-1068	Amenity	Noise from the Scheme will affect the Royal Worlington and Newmarket Golf Club.	Figure 11-4 of the Environmental Statement [APP-236] indicates that noise from the operational Scheme at the nearest boundary of the Royal Worlington and Newmarket Golf Club is predicted to be, at worst, 35 dB $L_{Aeq,T}$. This is substantially below the desirable level of 50 dB $L_{Aeq,T}$ for outdoor areas that is stated in BS 8233:2014. It should be noted that noise from the Scheme will be continuous, whereas golfers tend to find abrupt and noticeable changes to the noise environment off-putting. These kind of noise events may occur during the construction phase. Through consultation feedback, the Applicant has removed the construction site access from Golf Links Road which removes the requirement for HGVs to travel along Golf Links Road during the construction period.
RR-0091, RR-0114, RR-0137, RR-0275, RR-0285, RR-0468	Baseline	Noise is already an issue in Burwell.	The Applicant is proposing to remove the Burwell National Grid Substation Extension – Option 1 from the Scheme following the Relevant Representation from NGET. The preferred alternative option is to provide 33kV/400kV transformers at each of the onsite substation locations within Sunnica East Site A, Sunnica East Site B and Sunnica West Site A. However, until this option is confirmed as feasible by NGET, Burwell National Grid Substation – Option 2 which is located 450m from the closest receptor in Burwell will remain within the Scheme. Option 1 was assessed in the ES as it represented a worst-case due to it being located closer to sensitive receptors than Option 2. No significant noise effects were identified from Option 1 or from Option 2. Consequently, based on the changes, there are not anticipated to be any significant noise effects for residents within Burwell during operation.
RR-0209, RR-0468, RR-0529, RR-0579, RR-0775, RR-0779,	BESS	The BESS will generate noise with negative impacts.	The assessment of operation noise included noise emissions from the BESS. The assessment of operational noise was undertaken using industry standard guidance in BS 4142:2014+A1:2019. This requires is to assess noise the L_{A90} noise metric, which is the noise level that is exceeded for 90% of the time. This

Parties	Issue	Summary of issue raised	Applicant's response
RR-0787, RR-0835, RR-0891, RR-1092, RR-1125, RR-1257, RR-1130			allows the definition of 'quiet' conditions at assessment locations and omits any periods of high noise events. The noise assessment compares operational noise levels against the measured L_{A90} noise data. The results of the assessment indicate that noise effects will not be significant at nearby receptors from activities on the Sunnica sites, including from the BESS.
RR-0305, RR-0848	Burwell substation	Constant noise from the Burwell substation will be horrendous for the local residents.	The Applicant is proposing to remove the Burwell National Grid Substation Extension – Option 1 from the Scheme following the Relevant Representation from NGET. The preferred alternative option is to provide 33kV/400kV transformers at each of the onsite substation locations within Sunnica East Site A, Sunnica East Site B and Sunnica West Site A. However, until this option is confirmed as feasible by NGET, Burwell National Grid Substation – Option 2 which is located 450m from the closest receptor in Burwell will remain within the Scheme. Option 1 was assessed in the ES as it represented a worst-case due to it being located closer to sensitive receptors than Option 2. No significant noise effects were identified from Option 1 or Option 2. Consequently, based on the changes, there are not anticipated to be any significant noise effects for residents within Burwell during operation.
RR-0514, RR-0516	Construction	Construction traffic will generate noise with negative impacts.	The assessment of construction traffic in Table 11-15 of Chapter 11: Noise and Vibration of the Environmental Statement [APP-043] indicates that construction traffic will not result in a perceptible change in noise at assessment locations and that effects are therefore not significant.
RR-0024, RR-0132, RR-0137, RR-0167, RR-0173, RR-0186, RR-0194, RR-0195, RR-0209, RR-0243, RR-0288, RR-0322, RR-0343, RR-0344, RR-0351, RR-0354, RR-0357, RR-0376,	Construction	Construction activities such as piling will generate noise with negative impacts.	The requirement for a piling method statement will be added to the next iteration of the Framework CEMP, compliance with which is secured through the DCO. This will allow an appropriate method of piling to be adopted that minimises noise impacts.

Parties	Issue	Summary of issue raised	Applicant's response
RR-0384, RR-0440, RR-0444, RR-0459, RR-0483, RR-0486, RR-0498, RR-0519, RR-0524, RR-0550, RR-0578, RR-0633, RR-0640, RR-0675, RR-0681, RR-0684, RR-0692, RR-0700, RR-0737, RR-0738, RR-0739, RR-0748, RR-0764, RR-0781, RR-0793, RR-0799, RR-0825, RR-0842, RR-0855, RR-0861, RR-0893, RR-0906, RR-0923, RR-0944, RR-0980, RR-1071, RR-1113, RR-1131, RR-1144, RR-1164, RR-1169, RR-1184, RR-1186, RR-1189, RR-1190, RR-1209, RR-1235, RR-1240, RR-1256,			

Parties	Issue	Summary of issue raised	Applicant's response
RR-1277, RR-1301			
RR-0539, RR-0603	Ecology	There will be negative noise impacts on ecological receptors.	With reference to Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] , protected species identified as part of the detailed baseline surveys are reported in Tables 8-8, with an assessment of potential impacts undertaken in Section 8.9, including an assessment of noise impacts, where relevant. Where required, the Scheme has delivered appropriate mitigation. Paragraphs 8.817 to 8.8.23 and 8.8.28 set out avoidance and mitigation measures for protected and notable species. The assessment concluded that there will be no significant effects from noise on ecological receptors.
RR-0835	Mitigation	There are no mitigations to protect residents and businesses from the noise of the BESS.	Chapter 11: Noise and Vibration of the Environmental Statement [APP-044] contains an assessment of noise effects due to solar farm infrastructure, which includes transformers, inverters and the BESS. Predicted operational noise levels were compared with measured background noise levels using guidance in BS 4142:2014+A1:2019 and it was determined that noise effects due to solar farm infrastructure would not be significant. As such no specific noise mitigation measures are required.
RR-0275	Noise impact	Noise from the BESS will be worse during the summer once the cooling systems start working.	The assessment of noise from the BESS accounts for worst-case levels with cooling systems operating at full load at all times to cover a reasonable worst-case assessment. Consequently, noise predictions presented in Chapter 11: Noise and Vibration of the Environmental Statement [APP-044] (which were assessed to not lead to significant impacts) are considered representative of summer conditions and no significant impacts are identified. During most of the year noise levels will be lower than assessed in the Environmental Statement.
RR-0825, RR-0841, RR-0999	Noise impact	Noise from Scheme will frighten horses and will cause serious accidents to horses and riders.	Horses tend to be startled by short high noise events. Noise from a solar farm is low and continuous and unlikely to cause disturbance in the long-term; however, there may be a period of adjustment when the solar farm is testing. Information will be provided to equestrian groups on the timings of construction activities and testing. A point of contact will be available within the Contractor to liaise with the horse racing and training community and other neighbours. The Framework CEMP will be updated in due course to provide for this.

Parties	Issue	Summary of issue raised	Applicant's response
RR-0009, RR-0012, RR-0044, RR-0091, RR-0169, RR-0221, RR-0225, RR-0322, RR-0352, RR-0358, RR-0378, RR-0545, RR-0579, RR-0617, RR-0669, RR-0839, RR-0840, RR-0852, RR-0944, RR-0948, RR-1001, RR-1034, RR-1087, RR-1128, RR-1206, RR-1246, RR-1325,	Operations	The Scheme will generate operational noise with negative impacts.	The assessment of operational noise was undertaken using industry standard guidance in BS 4142:2014+A1:2019. This requires is to assess noise the L_{A90} noise metric, which is the noise level that is exceeded for 90% of the time. This allows us to define 'quiet' conditions at assessment locations and omits any periods of high noise events. The noise assessment compares operational noise levels against the measured L_{A90} noise data. The results of the assessment in Table 11-18 of Chapter 11: Noise and Vibration of the Environmental Statement [APP-043] indicate that noise effects will not be significant at nearby receptors. The Operational Environmental Management Plan (OEMP), based on the Framework OEMP [APP-126] , that is brought forward for approval in detailed design will set out how the Scheme design and operational plant levels have been developed to mitigate and reduce effects to a minimum.

3.22 Compulsory acquisition

3.22.1 62 individual comments were received in relation to compulsory acquisition.

Applicant's responses to RRs relating to compulsory acquisition

Parties	Issue	Summary of issue raised	Applicant's response
RR-0649, RR-0982	Compulsory acquisition	Compulsory acquisition poses a threat to affected agricultural businesses.	The impact of the Scheme (including the compulsory acquisition of land)] on farming businesses has been assessed in Chapter 12: Socio-economics and Land Use of the Environmental Statement [APP-044] . The assessment has concluded that the Scheme is unlikely to have a significant effect on farm businesses.

Parties	Issue	Summary of issue raised	Applicant's response
			Construction of the Scheme will mean the start of a prolonged suspension of the current agricultural use of the land, and the start of a new diversified enterprise for the agricultural land owners as the site is leased (or acquired if voluntary agreement is unable to be reached) to the Scheme. The sensitivity of the arable enterprises to the loss of this land is considered to be low as the farm businesses that carry out their own land work also manage additional land not affected by the Scheme. Construction effects on the occupying farm businesses are therefore considered to be negligible and classed as not significant. During operation of the Scheme, the agricultural land owners will benefit from the income provided by this diversified enterprise (where the land is leased for the purposes of the Scheme). This 40 year diversification will displace existing arable enterprises from the land within the Sites, however this displacement will free up farm resources for application on other land, not least the limited volume of water that can be abstracted under licence. The magnitude of beneficial change will be medium and the sensitivity of the receptor low, resulting in a Minor Beneficial effect which is classed as not significant (see Chapter 5: EIA Methodology [APP-037] for a definition of the terminology used to describe residual effects). Further detail as to the farm businesses affected by the Scheme is provided in the chapter and is included in Appendix 12B to the Environmental Statement [APP-115] – see in particular section 5.9. The Applicant is seeking to reach agreements with the owners of the parts of the agricultural businesses proposed to be acquired for the purposes of the Scheme. Powers of compulsory acquisition will only be exercised where no agreement can be reached with an affected landowner. The compulsory acquisition procedure will compensate any landowner for the rights and land acquired.
RR-0410, RR-0969	Compulsory acquisition	The compulsory acquisition of roads will have negative impacts.	The Applicant has not proposed to compulsorily acquire ownership of public roads within the Order limits. There will, however, be the requirement to obtain rights over land and roads in order to build grid connection routes A and B and to facilitate access to the Scheme. Further information on the potential disruption to these

Parties	Issue	Summary of issue raised	Applicant's response
			areas can be found in the Traffic Regulation Measures Plans – Temporary Measures [APP-012 to APP-013] .
RR-1261, RR-1262, RR-1263, RR-1275	Compulsory acquisition	There is too much variation in the rights to be acquired.	The Applicant respectfully disagrees with this statement. The Applicant has applied a systematic approach to the identification and extent of rights required for the Scheme, as set out in the Statement of Reasons [APP-022] . This is exemplified by the fact that the schedule setting out the rights to be acquired included within the draft DCO (Schedule 8) only provides for three types of rights requirements.
RR-0009, RR-0331, RR-1009, RR-1306, RR-0087, RR-0209, RR-0711, RR-0631, RR-0654, RR-0683, RR-0135, RR-0602, RR-0819, RR-0082, RR-0024	Compulsory acquisition	The Applicant has unfairly threatened landowners with compulsory acquisition.	The use and application of compulsory acquisition powers is considered the last resort to secure the land and rights needed for the Scheme. Sunnica has sought to limit the extent of the land required to be compulsorily acquired by as much as possible. This is explained in the Statement of Reasons [APP-022] and the evolution of the Scheme is explained in the Design and Access Statement [APP-264]. Where the Applicant is seeking powers of compulsory acquisition, the Applicant's preference is to negotiate the acquisition of land and/or interests in land and enter into a voluntary agreement with the landowner. The Applicant remains committed to acquiring all land and rights by voluntary agreement in the first instance however it requires the powers of compulsory acquisition sought in order to provide certainty that they will have all the land required to construct and operate the Scheme.
RR-1017, RR-1170, RR-1262, RR-1263, RR-1275,	Compulsory acquisition	The availability of compulsory purchase powers disincentivises the Applicant from negotiating.	The Applicant respectfully disagrees. The Applicant would not obtain powers of compulsory acquisition unless the Secretary of State is satisfied that attempts to negotiate have been made. In any event, the Applicant has tried to reach, and remains committed to reaching, negotiated agreements with all landowners. The use of compulsory purchase powers is a last resort for the Applicant. It is recommended in the Government guidance, DCLG 'Guidance related to procedures for the compulsory acquisition of land' (2013), for development consent orders that powers for compulsory acquisition of land are included in the application to ensure that the Scheme can still proceed if negotiated agreements cannot be reached. Paragraph 26 states that <i>"Applicants should consider at what point the land they</i>

Parties	Issue	Summary of issue raised	Applicant's response
			<i>are seeking to acquire will be needed and, as a contingency measure, should plan for compulsory acquisition at the same time as conducting negotiations".</i>
RR-1289	Compulsory acquisition	The DCO currently contains that NGET have the benefit of Work 5C. NGET do not consider that this is necessary as these works will be undertaken by the Promoter. NGET notes that the Book of Reference and Land Plans indicate that powers for the compulsory acquisition of rights and extinguishment of rights are included over NGET's operational land including the National Grid Burwell Main Substation. Powers to compulsory acquire the freehold of land for the Option 1 connection now need to be removed as this is not technically feasible and the Promoter does not require land rights over the National Grid Burwell Main Substation as this will be covered by the Interface Agreement.	Sunnica provided NGET with the benefit of the proposed DCO for Work No.5C to allow enabling works to connect the Burwell National Grid Substation Extension to be connected into the Burwell National Grid Substation. Whilst Sunnica understood that it would deliver the underground electrical cable from the substation extension to the existing substation it anticipated that National Grid would undertake the works from the substation fence line, hence including all of the substation in Work No.5C. Through its change application, Sunnica has removed from its Application powers of compulsory acquisition of the freehold for the Option 1 land but has retained rights powers to enable the installation, maintenance and operation of the connection into the existing substation. Sunnica does not currently have the benefit of an interface agreement and so wishes to retain powers to install, maintain and operate the connection into the existing substation. In any event, as the use of these powers is subject to NGET's consent, it will be able to require relevant conditions which will ensure that the connections are undertaken in an appropriate fashion – including, for example, through an Interface Agreement.
RR-1289	Compulsory acquisition	NGET strongly opposes any compulsory acquisition or extinguishment of rights over its land.	As set out in paragraph 8.2.12 of the Applicant's Statement of Reasons [APP-022]: <i>"Article 29 of the draft Sunnica DCO gives the undertaker certain powers in relation to compulsory acquisition of land and acquisition of rights belonging to statutory undertakers within the Order limits. That Article is subject to the protective provisions included at Schedule 12 of the draft Sunnica DCO, which provide adequate protection for statutory undertakers' assets. Accordingly, the Applicant</i>

Parties	Issue	Summary of issue raised	Applicant's response
			<i>considers that the statutory undertakers will not suffer serious detriment to the carrying on of their undertaking. The tests set out in sections 127(3) and 127(6) of the PA 2008 are therefore satisfied."</i> In the case of NGET, the Applicant's draft DCO [APP- 019] submitted with its DCO Application, includes provisions for the protection of National Grid (as electricity and gas undertaker) (Part 6, Schedule 12). Paragraph 63 of the protective provisions provides: <i>"(1) Regardless of any provision in this Order or anything shown on the land and Crown land plans or contained in the book of reference to the Order, the undertaker must not (a) appropriate, acquire or take temporary possession of any land interest or apparatus; or (b) appropriate, acquire, extinguish, interfere with or override any easement or other interest or right or apparatus of National Grid otherwise than by agreement (such agreement not to be unreasonably withheld)."</i> Under paragraph 66 of the National Grid Protective Provisions, National Grid's approval is required for any works that are within 15 metres of any National Grid apparatus. The ability of the Applicant to exercise the powers in the DCO with respect to NGET's interests and apparatus is therefore subject to the above restrictions in the DCO. In addition, the Applicant continues to negotiate with NGET with respect to the protective provisions and any necessary side agreements. The Applicant therefore considers that NGG will not suffer serious detriment to the carrying on of their undertaking, given the above controls and protections that are intended to be in place. The Applicant is currently in contact with NGET concerning any legal agreement required in addition to the above, to enable Grid Connection Route B to cross NGET land to reach the connection point at Burwell substation.

Parties	Issue	Summary of issue raised	Applicant's response
RR-1290	Compulsory acquisition	The following assets, which form an essential part of the gas transmission networks in England and Wales are within, or in close proximity to, the Order limits: • Feeder Main 3 Roudham Heath to Great Wilbraham • Feeder Main 3 Barton Mills to Burwell Compulsory Acquisition Powers NGG strongly opposes any compulsory acquisition of land or apparatus or any extinguishment of rights over its land. Any such powers would cause serious detriment to NGG's ability to comply with its statutory duties.	As set out in paragraph 8.2.12 of the Applicant's Statement of Reasons [APP-022]: <i>"Article 29 of the draft Sunnica DCO gives the undertaker certain powers in relation to compulsory acquisition of land and acquisition of rights belonging to statutory undertakers within the Order limits. That Article is subject to the protective provisions included at Schedule 12 of the draft Sunnica DCO, which provide adequate protection for statutory undertakers' assets. Accordingly, the Applicant considers that the statutory undertakers will not suffer serious detriment to the carrying on of their undertaking. The tests set out in sections 127(3) and 127(6) of the PA 2008 are therefore satisfied."</i> In the case of NGG, the Applicant's draft DCO [APP-019] submitted with its DCO Application, includes provisions for the protection of National Grid (as electricity and gas undertaker) (Part 6, Schedule 12). Paragraph 63 of the protective provisions provides: <i>"(1) Regardless of any provision in this Order or anything shown on the land and Crown land plans or contained in the book of reference to the Order, the undertaker must not (a) appropriate, acquire or take temporary possession of any land interest or apparatus; or (b) appropriate, acquire, extinguish, interfere with or override any easement or other interest or right or apparatus of National Grid otherwise than by agreement (such agreement not to be unreasonably withheld)."</i> Under paragraph 66 of the National Grid Protective Provisions, National Grid's approval is required for any works that are within 15 metres of any National Grid apparatus. The ability of the Applicant to exercise the powers in the DCO with respect to NGG's interests and apparatus is therefore subject to the above restrictions in the DCO. In addition, the Applicant continues to negotiate with NGG with respect to the protective provisions and any necessary side agreements. The Applicant therefore considers that NGG will not suffer serious detriment to the carrying on of their

Parties	Issue	Summary of issue raised	Applicant's response
			undertaking, given the above controls and protections that are intended to be in place.
RR-1128	Compulsory acquisition	The scheme cannot be built without compulsory purchase, yet the scheme fails to meet the statutory and policy test for use of such powers.	The Applicant considers that full reasons and justification for the inclusion of compulsory purchase powers have been detailed in sections 4, 5 and 6 of the Statement of Reasons [APP-022] . It should be noted that the Applicant is committed to reaching negotiated agreements with all affected landowners.
RR-1160	Compulsory acquisition	Voluntary offers of land were given before a lot of the important information came to light.	The Applicant has been trying to reach voluntary agreement for an extended period of time with some landowners as set out in the Schedule of Negotiations and Powers Sought [APP-025] . Naturally over that time, details of the Scheme and its impacts have developed which has informed discussions with landowners. The Applicant has been updating all affected landowners as the Scheme has developed, including at our statutory consultation. This has allowed each landowner to make fully informed and voluntary decisions based on the information available at the relevant time. The Applicant is still seeking to reach voluntary settlements where possible.
RR-1292	Compulsory acquisition	The Book of Reference (BoR) identifies 12 plots (Plots) of land owned by Network Rail in respect of which compulsory acquisition powers to acquire new rights are sought. The compulsory acquisition powers sought are described in the BoR as being the creation and compulsory acquisition of new rights over land and the compulsory acquisition of land (Compulsory Powers). To safeguard Network Rail's interests and the safety and integrity of the operational railway, Network Rail	As set out in paragraph 8.2.12 of the Applicant's Statement of Reasons [APP-022]: <i>"Article 29 of the draft Sunnica DCO gives the undertaker certain powers in relation to compulsory acquisition of land and acquisition of rights belonging to statutory undertakers within the Order limits. That Article is subject to the protective provisions included at Schedule 12 of the draft Sunnica DCO, which provide adequate protection for statutory undertakers' assets. Accordingly, the Applicant considers that the statutory undertakers will not suffer serious detriment to the carrying on of their undertaking. The tests set out in sections 127(3) and 127(6) of the PA 2008 are therefore satisfied."</i> In the case of Network Rail, the Applicant's draft DCO [APP-019] submitted with its DCO Application, includes provisions for the protection of Network Rail (Part 10, Schedule 12). Paragraph 109 of the protective provisions provides that the

Parties	Issue	Summary of issue raised	Applicant's response
		objects to the inclusion of the Plots in the Order and to Compulsory Powers being granted in respect of them. Network Rail also objects to all other compulsory powers in the Order that affect, and may be exercised in relation to, Network Rail's property and interests. In order for Network Rail to be in a position to withdraw its objection Network Rail requires: (a) agreements with the Applicant that regulate: (i) the manner in which rights over the Plots and any other railway property are acquired and the relevant works are carried out including terms which protect Network Rail's statutory undertaking and agreement that compulsory acquisition powers will not be exercised in relation to such land; and (ii) the carrying out of works in the vicinity of the operational railway network to safeguard Network Rail's statutory undertaking; (b) the inclusion of protective provisions in the DCO for its benefit.	Applicant must not exercise powers conferred by various articles in the Order, including article 17 (authority to survey and investigate the land); article 18 (compulsory acquisition of land); article 20 (compulsory acquisition of rights); article 23 (acquisition of subsoil only); article 24 (power to override easements and other rights); article 27 (temporary use of land for constructing the authorised development); article 28 (temporary use of land for maintaining the authorised development); and article 29 (statutory undertakers), in respect of any railway property unless the exercise of such powers is with the consent of Network Rail. Under paragraph 110 of Network Rail's Protective Provisions, Network Rail's consent is also required for any works that are within 15 metres of railway land. The ability of the Applicant to exercise the powers in the DCO with respect to Network Rail's interests and apparatus is therefore subject to the above restrictions in the DCO. In addition, the Applicant continues to negotiate with Network Rail with respect to the protective provisions and framework agreement, to ensure protections are in place that are satisfactory to Network Rail. The proposed protective provisions and framework agreement address all items listed under para (a) of Network Rail's representation. The Applicant therefore considers that Network Rail will not suffer serious detriment to the carrying on of their undertaking, given the above controls and protections that are intended to be in place. Sunnica is currently negotiating with Network Rail for the undertrack crossing required on Grid Connection_Route B. These negotiations are progressing and parties remain hopeful that agreement can be reached.
RR-1170	Compulsory acquisition	Previous compulsory purchases [on other schemes, based on the experience of the agent writing on	The acquisition of land and rights and the temporary use of land, together with the overriding of interest, rights and restrictive covenants and the suspension or

Parties	Issue	Summary of issue raised	Applicant's response
		behalf of the landowner] have been too large, which has led to rights being granted over a large area of land which wasn't ever required.	extinguishment of private rights is no more than is reasonably required to facilitate or is incidental to the Scheme. Furthermore, the land identified to be subject to compulsory acquisition is no more than is reasonably necessary for that purpose and is proportionate. With respect to the cable corridor and rights or powers of temporary possession sought over it, the corridor is estimated to be between 30 – 100 metres at different locations along the cable route, dependent on factors outlined in Appendix A of the Statement of Reasons [APP-022] for the electrical cables and temporary construction laydown along the cable route (Work No. 4) (over which the power to acquire new rights is included in the Order), and once it has carried out detailed surveys and installed the cables, to acquire new rights only in respect of the relevant strip within that overall corridor in which the permanent easement would be located.
RR-0775	Compulsory acquisition	Land within Freckenham (affecting the Freckenham conservation area) has been designated for compulsory purchase with insufficient detail provided.	No land within Freckenham has been proposed for compulsory acquisition of land. Compulsory acquisition of rights are proposed in order to facilitate crane access through the village, by allowing for street furniture to be temporarily removed.
RR-1292	Compulsory acquisition	Network Rail objects to all other compulsory powers in the Order that affect, and may be exercised in relation to, Network Rail's property and interests. In order for Network Rail to be in a position to withdraw its objection Network Rail requires: (a) agreements with the Applicant that regulate: (i) the manner in which rights over the Plots and any other railway property are acquired and the	The Applicant notes that Network Rail does not object to the Scheme in principle. The Applicant has discussed its proposals with Network Rail and is discussing with Network Rail appropriate provisions that, once agreed, would enable Network Rail to withdraw its objection. Negotiations are ongoing.

Parties	Issue	Summary of issue raised	Applicant's response
		relevant works are carried out including terms which protect Network Rail's statutory undertaking and agreement that compulsory acquisition powers will not be exercised in relation to such land; and (ii) the carrying out of works in the vicinity of the operational railway network to safeguard Network Rail's statutory undertaking; (b) the inclusion of protective provisions in the DCO for its benefit.	
RR-1292	Compulsory acquisition	Network Rail considers that there is no compelling case in the public interest for the Compulsory Powers and that the Secretary of State, in applying section 127 of the Planning Act 2008, cannot conclude that new rights and restrictions over the Plots can be created without serious detriment to Network Rail's undertaking; no other land is available to Network Rail by which to make good the detriment.	The Applicant notes Network Rail's concerns and, as discussed above, is in the process of negotiating terms that would enable Network Rail to withdraw its objection. However, as set out in paragraph 8.2.12 of the Applicant's Statement of Reasons [APP-022], the Applicant considers that, taking into account the protective provisions for the benefit of railway undertakers contained in Part 10 of Schedule 12 to the draft DCO [APP-019] avoid the powers sought in the Order from having a serious detriment to Network Rail's undertaking and so, notwithstanding Network Rail's objection (if not withdrawn), the Secretary of State can be satisfied that the tests in section 127 of the Planning Act 2008 will be met.
RR-1017	Compulsory acquisition	Sunnica has prematurely included compulsory purchase powers over the LGC Campus before it has begun any material negotiation.	This is incorrect. Sunnica commenced negotiations with HPUT A Limited and HPUT B Limited on 29 June 2021 by issuing Heads of Terms for option for easement. It has been in negotiations since that date. The Schedule of Negotiations (APP-025) shows this up to the point the Application was made. This document will be updated for Deadline 1 and will demonstrate the additional negotiations that have taken place since the Application was made. There have been extensive negotiations and

Parties	Issue	Summary of issue raised	Applicant's response
			Sunnica will continue to seek agreement by negotiation but must retain compulsory powers over this land in the event that agreement cannot be reached.
RR-1017	Compulsory acquisition	The wording of the Cable Rights sought over the LGC Campus appear to create uncertainty that even car parking critical to the Campus Expansion can be brought forward.	The description of the purposes for which the Applicant could acquire compulsorily "cable rights" is set out in paragraph 1 of Schedule 8 to the draft DCO [APP-019] and describes the minimum rights required by the Applicant to construct, operate and thereafter protect the electrical cable infrastructure. In principle, the Applicant does not consider that the use of the land lying above the electrical cable infrastructure for car parking would be incompatible with the exercise of the cable rights. The Applicant intends to progress discussions with the respondent with a view to reaching an agreed position on the compatibility of the respective proposals.
RR-1017	Compulsory acquisition	The DCO application does not appear to evidence a reasonable prospect of the requisite funds for any compulsory acquisition becoming available for the DCO Scheme.	The Applicant has provided information on how it proposes to fund its DCO obligations in the Funding Statement [APP-023]. It considers that the proposed funding mechanism is entirely normal in the market and that the necessary funds will be available to meet the compulsory acquisition costs. Furthermore, Sunnica has included Article 43 in the draft DCO which requires it to put into place a guarantee or alternative security to ensure that all liabilities of Sunnica to pay compensation pursuant to compulsory acquisition powers under the DCO can be met. The form and amount of the guarantee or alternative security is subject to approval by the Secretary of State.
RR-1017	Comment	Applicants for a DCO should seek to acquire land by negotiation wherever practicable.	Sunnica agrees and it has sought to negotiate acquisition of all necessary land and property interests. This is evidenced in the Statement of Reasons [APP-022] and the Schedule of Negotiations and Power Sought [APP-025] .
RR-0190, RR-0274, RR-0287, RR-0301, RR-0472, RR-0592, RR-0602, RR-0835, RR-0854,	Comment	Concerned at the use of compulsory purchase powers.	Sunnica would like to agree all necessary property interests by negotiation and it will continue its efforts to do so throughout the examination. It will regularly update the Schedule of Negotiations and Power Sought [APP-025] to demonstrate this.

Parties	Issue	Summary of issue raised	Applicant's response
RR-0897, RR-1098, RR-1167			
RR-0757	Comment	The Charity of Katherine Shore has received correspondence about Compulsory Purchase affecting the charity's field at the junction of Mildenhall Road, Freckenham, and the road to West Row.	The Applicant included plots 21-02 and 21-03 within the Order limits to account for the transportation of Abnormal Indivisible Loads (AILs) to Sunnica East Site A. Correspondence was issued to The Charity of Katherine Shore on 11 November 2021 to provide notification that the subsoil interest which they may hold in these plots could be affected by the Scheme. The letter asked to discuss the possibility of using the land which they may presently own or occupy in this location as part of the Scheme. The Applicant wrote to The Charity of Katherine Shore on 25 July 2022 regarding the Applicant's proposed changes to the which would involve adding a new plot (21-04) to the Order limits. This plot forms part of the unregistered land to the north of Mildenhall Road and was most recently confirmed to be owned by The Charity of Katherine Shore on 15 July 2021. Discussions are ongoing and the Applicant hopes to progress negotiations for a licence for the rights required to temporarily use the land to facilitate the passage of abnormal indivisible loads during construction.
RR-1289	Land rights	The Grid Connection Statement further sets out that "the Applicant has, or will have, the ability to procure the necessary land and rights in order to upgrade the Burwell National Grid Substation to accommodate the Grid Connection". The Promoter will need to install user equipment inside the NGET substation but will not require any land rights to do so as this will be covered by the Interface Agreement between the parties.	Sunnica does not currently have the benefit of an interface agreement and so wishes to retain powers to install, maintain and operate the connection into the existing substation. The interface agreement could be a requirement of National Grid's consent under the Protective Provisions if this became necessary.

Parties	Issue	Summary of issue raised	Applicant's response
RR-1289	Protective provisions	Network Rail welcomes the fact that there are protective provisions for its benefit in the Order and, if necessary, will provide detailed comments on, and amendments to, the protective provisions when it submits its detailed Written Representation.	This is noted. The Applicant is continuing to negotiate the form of the protective provisions with Network Rail and would anticipate agreement being reached in this respect during the course of the Examination.
RR-1138	Protective provisions	Protective provisions are required in relation to South Staffordshire Water PLC's assets. Further information is also required regarding impacts on these assets.	The Applicant has contacted South Staffordshire Water PLC's lawyers on 13 May 2022, following receipt of the representation, with respect to protective provisions, in order that the appropriate protection for South Staffordshire Water PLC's assets can be agreed and included in the DCO. Protective provisions are now being progressed between the parties.
RR-1289	Protective provisions	National Grid Electricity Transmission Plc (NGET) wishes to make a relevant representation in order to protect their position in relation to infrastructure and land which is within or in close proximity to the proposed Order limits. NGET's rights to retain its apparatus in situ and rights of access to inspect, maintain, renew and repair such apparatus located within or in close proximity to the Order limits should be maintained at all times and access to inspect and maintain such apparatus must not be restricted. NGET will require protective provisions to be included within the	Sunnica has included protective provisions for the benefit of National Grid on the face of the draft Development Consent Order submitted with the Application [APP-019]. As recorded in the Schedule of Negotiations and Powers Sought [APP-025] negotiation of the protective provisions commenced substantively in July 2021. They are not currently in agreed form, but Sunnica expects them to be by the close of the Examination at the latest.

Parties	Issue	Summary of issue raised	Applicant's response
		DCO to ensure that its interests are adequately protected and to ensure compliance with relevant safety standards. NGET is liaising with the Promoter in relation to the protective provisions for inclusion within the DCO along with any supplementary agreements which may be required.	
RR-1290	Protective provisions	NGG's rights to retain its apparatus in situ and rights of access to inspect, maintain, renew and repair such apparatus located within or in close proximity to the Order limits should be maintained at all times and access to inspect and maintain such apparatus must not be restricted. NGG will require protective provisions to be included within the DCO to ensure that its interests are adequately protected and to ensure compliance with relevant safety standards. NGG is liaising with the Promoter in relation to the protective provisions for inclusion within the DCO along with any supplementary agreements which may be required. NGG will keep the Examining Authority updated in relation to these discussions.	Sunnica has included protective provisions for the benefit of National Grid Gas as well as NGG on the face of the draft Development Consent Order submitted with the Application [APP-019]. As recorded in the Schedule of Negotiations and Powers Sought [APP-025] negotiation of the protective provisions commenced substantively in July 2021. They are not currently in agreed form, but Sunnica expects them to be by the close of the examination at the latest.

Parties	Issue	Summary of issue raised	Applicant's response
RR-1138	Works	Any works required to be carried out on South Staffordshire Water PLC's assets must be planned and implemented to avoid risk of supply interruption or damage to the integrity of the water network.	The Applicant acknowledges the comments from South Staffordshire Water PLC. It is seeking to agree protective provisions with South Staffordshire Water to allay its concerns and it will update the examination in due course on this front.

3.23 Other

3.23.1 335 miscellaneous comments were received in relation to various matters.

Applicant's responses to miscellaneous matters received from RRs

Parties	Issue	Summary of issue raised	Applicant's response
RR-0088, RR-0145, RR-0160, RR-0163, RR-0185, RR-0186, RR-0189, RR-0194, RR-0243, RR-0254, RR-0275, RR-0323, RR-0362, RR-0393, RR-0409, RR-0438, RR-0440, RR-0468, RR-0500, RR-0516, RR-0524, RR-0534, RR-0539, RR-	Applicant	The Applicant has no experience of developing in the local area or at the scale involved.	The Sunnica Energy Farm utilises tried and tested technologies and Sunnica Ltd is a joint venture between Tribus Energy and PS Renewables who are experienced developers of solar farms and BESS in the south of England. Sunnica Ltd is advised by consultants who are 'best in class' environmental, land referencing, land agency, consultation and public affairs, legal and technical specialists.

Parties	Issue	Summary of issue raised	Applicant's response
0577, RR-0579, RR-0581, RR-0607, RR-0612, RR-0626, RR-0635, RR-0640, RR-0642, RR-0662, RR-0707, RR-0819, RR-0854, RR-0884, RR-0908, RR-0976, RR-1015, RR-1027, RR-1036, RR-1160, RR-1167, RR-1225, RR-1236, RR-1247, RR-1304, RR-1307, RR-1335, RR-1338			
RR-0049, RR-0111, RR-0143, RR-0164, RR-0167, RR-0172, RR-0197, RR-0277, RR-0305, RR-0371, RR-0430, RR-0436, RR-0477, RR-0490, RR-0492, RR-0493, RR-0498, RR-0500, RR-0521, RR-0537, RR-0549, RR-0553, RR-	Applicant	The Applicant is not a British company. This means profits will not be kept in the UK and also risks putting energy generation infrastructure in the hands of foreign companies.	There is no requirement that a company building and operating UK-based sources of energy generation needs to be British. Indeed, a significant number of companies investing in new sources of renewable energy are based outside of the UK. The Applicant has provided an organogram showing details of the ownership structure of Sunnica Ltd in Appendix A of the Funding Statement [APP-023] of its DCO application. Sunnica Ltd is registered in the United Kingdom as company 08826077. It is therefore subject to UK regulation and taxation.

Parties	Issue	Summary of issue raised	Applicant's response
0554, RR-0580, RR-0601, RR-0610, RR-0624, RR-0626, RR-0640, RR-0646, RR-0657, RR-0658, RR-0727, RR-0736, RR-0761, RR-0772, RR-0787, RR-0817, RR-0828, RR-0829, RR-0833, RR-0840, RR-0844, RR-0848, RR-0854, RR-0875, RR-0896, RR-0931, RR-0947, RR-0967, RR-0971, RR-1032, RR-1049, RR-1062, RR-1066, RR-1072, RR-1077, RR-1081, RR-1084, RR-1115, RR-1118, RR-1131, RR-1152, RR-1204, RR-1229, RR-1232, RR-1236, RR-1245, RR-1247, RR-1285, RR-1304, RR-			

Parties	Issue	Summary of issue raised	Applicant's response
1323, RR-1335, RR-1337			
RR-0005, RR-0049, RR-0059, RR-0073, RR-0081, RR-0105, RR-0117, RR-0134, RR-0147, RR-0163, RR-0172, RR-0189, RR-0322, RR-0334, RR-0341, RR-0383, RR-0468, RR-0659, RR-0825, RR-1002, RR-1160, RR-1239, RR-1295, RR-1300, RR-1335	Applicant	Further information is required regarding the financial capability of the Applicant.	The Applicant and its constituent companies and consultants have an established track record of delivering projects of this kind. The Applicant's means of funding the project is set out in the Funding Statement [APP-023] .
RR-0699, RR-1125	Atmospheric change	Large solar farms can have a significant effect on surrounding temperatures	Solar farms have the potential to affect the micro-climate beneath panels, which could impact on the potential growth of certain plant species. The planting and monitoring for the Scheme is provided with the Outline Landscape and Ecological Management Plan [APP-108] .
RR-1092	BESS	The BESS will negatively impact on dogs in the local area.	The BESS will be secured and access to its components will be off-limits to the public (including their dogs), so components of the BESS will not be accessible. Health issues and other negative impacts on dogs are therefore not expected to arise as a result.
RR-0305	Comment	The amount of capital to get to this stage makes me fear the deal has already been done at a high level.	The Applicant has brought forward the Application at its own cost. The final decision as to whether the Scheme should proceed will be made by the Secretary of State. In doing so, the Secretary of State will receive advice from the Examining Authority which is an independent panel of inspectors appointed to carry out an Examination

Parties	Issue	Summary of issue raised	Applicant's response
			of the application. This Examination is a transparent process that will take place in public, all documents accepted into the Examination are available to view online.
RR-0014, RR-0500, RR-0663, RR-0695, RR-0795, RR-1042, RR-1169, RR-1075, RR-1080	Comment	Concerned about the impact on future generations.	Chapter 9 of the Statement of Need [APP-260] provides an analysis of the economic viability of large-scale solar generation as a future contributor to a low-carbon GB electricity supply system in comparison to alternate technologies; and an analysis of why the Scheme will be most beneficial to the achievement of government's Net Zero aims if it is consented to the scale proposed. The Scheme will contribute to addressing the climate change emergency that affects everyone's lives and the environment, by ensuring our energy supply is secure, low-carbon and low-cost.
RR-1163	Comment	I share in the pastoral care of many people who stand to be directly affected by the proposal, and I am aware of the significant concerns and the interests of parties on both sides.	The Applicant notes this representation.
RR-0005, RR-0029, RR-0040, RR-0049, RR-0074, RR-0079, RR-0080, RR-0100, RR-0113, RR-0119, RR-0157, RR-0163, RR-0172, RR-0192, RR-0203, RR-0223, RR-0225, RR-0235, RR-0283, RR-0296, RR-0302, RR-0314, RR-0323, RR-0403,	Community impact	Concerned at the impact that the Scheme will have on the community.	The Applicant has carried out a full environmental impact assessment (EIA) which is summarised in the Environmental Statement and the associated figures and appendices. The significant adverse effects of the Scheme identified by this assessment have been mitigated where possible. Adverse effects identified in Chapter 12: Socio-economics and Land Use of the Environmental Statement [APP-044] include temporary disruptions to the users of some PRoWs that will be closed or diverted temporarily during the construction and decommissioning phases. This has been assessed as moderate adverse for users three PRoWs being affected, and an assessment of minor adverse to negligible for other PRoWs. Chapter 15: Human Health of the Environmental Statement [APP-047] also recognises the temporary adverse effects of disruption to PRoW users, including an adverse effect on connection with existing communities during the construction and decommissioning phases. The chapter also recognises the adverse effect of noise pollution during operation.

Parties	Issue	Summary of issue raised	Applicant's response
RR-0408, RR-0450, RR-0457, RR-0469, RR-0575, RR-0607, RR-0649, RR-0652, RR-0653, RR-0654, RR-0756, RR-0759, RR-0764, RR-0785, RR-0786, RR-0807, RR-0808, RR-0829, RR-0867, RR-0869, RR-0936, RR-0956, RR-0996, RR-1029, RR-1182, RR-1219, RR-1222, RR-1228, RR-1270, RR-1288, RR-1299			
RR-0982	Cumulative impacts	The plans take no account of the plans to re-establish a rail link between Cambridge and Mildenhall on the oil track bed.	The cumulative assessment has assessed all relevant planning applications and developments in construction. Any plans to re-establish a rail link between Cambridge and Mildenhall are not yet formal or in the planning process and so cannot be considered effectively.
RR-0533, RR-0600, RR-0632, RR-0691, RR-0708, RR-0866, RR-1062, RR-1080, RR-1132, RR-1162	Cumulative impacts	There are already many housing projects commencing in the area	The cumulative impacts from the Scheme in combination with other schemes, including housing developments, in the area have been considered for all environmental disciplines. These assessments are presented within each of the technical chapters in the Environmental Statement (Chapters 6 to 16 [APP-038 to APP-048]). The cumulative effects assessment identifies some significant effects in the construction period of the Scheme as a result of a number of developments being under construction and in operation at the same time as the Scheme. These

Parties	Issue	Summary of issue raised	Applicant's response
			are summarised in Chapter 17: Effect interactions of the Environmental Statement [APP-049] . No significant cumulative effects with other developments (including the nearby housing developments) have been identified during the Scheme's operation.
RR-0487, RR-0895, RR-1310	Electromagnetic fields	The Scheme will lead to radio interference from electromagnetic fields.	The potential effect from the Scheme on telecommunications and television reception has been assessed in Chapter 16: Other Environmental Topics of the Environmental Statement [APP-048] . Mobile telecommunications masts are not expected to be affected by the Scheme, given the low-lying nature of the Scheme and the lack of potential for it to form a barrier between the mast and any receiving station. Therefore, the Scheme is not anticipated to interfere with telecommunications infrastructure and no effects are anticipated in the construction, operation, and decommissioning phases. The Scheme consists of fixed low-lying infrastructure with no moving parts and is therefore unlikely to interfere with digital television signals and therefore no effects are anticipated in the construction, operation, and decommissioning phases.
RR-1281	Funding	No public money should be used for the Scheme.	The Scheme is not funded by public money. The Applicant has included a Funding Statement as part of the DCO application to demonstrate how the project will be funded. Further details regarding the funding of the Sunnica Energy Farm can be found within the Funding Statement [APP-023] submitted as part of the DCO application.
RR-0115, RR-0165, RR-0274, RR-0554, RR-0581, RR-0589, RR-0809, RR-0871	Ground conditions	Concern about contamination of the soil by leachates from the Scheme.	A Ground Condition Assessment is presented in Chapter 16: Other Environmental Topics [APP-048] which identified potential contaminant linkages such as leaching of contaminants (if present) from the overlying soils to groundwater and lateral groundwater migration and discharge to surface water are assessed as moderate/low in the absence of mitigation. However with the recommended mitigation measures in place, including a geo-environmental investigation (as outlined Requirement 18 of the Draft DCO) prior to construction to enable the identification of suitable mitigation measures (should they be required) and the measures outlined in Table 3-10 of the Framework CTMP [APP-123] the effects are anticipated to be reduced to very low to low and not significant. The assessment is described in Table 6.1 (page 16B-44 / 45) within Appendix 16B of the Environmental Statement [APP-122].

Parties	Issue	Summary of issue raised	Applicant's response
			The additional mitigation is described in Chapter 16: Other Environmental Topics of the Environmental Statement [APP-048] from paragraph 16.4.20 and reads: <i>“intrusive site investigation is recommended to provide adequate geoenvironmental data to evaluate soil and groundwater quality and refine the conceptual site model. It will also enable the identification of suitable mitigation measures (should they be required) so that unacceptable pollutant linkages do not exist on completion of the Scheme. The geoenvironmental investigation should be designed with due consideration of the requirements of BS 10175:2011: +A2 2017: Investigation of Potentially Contaminated Sites – Codes of Practice (BSI).”</i>
RR-0039, RR-0078, RR-0097, RR-0109, RR-0170, RR-0177, RR-0243, RR-0250, RR-0275, RR-0281, RR-0288, RR-0304, RR-0309, RR-0322, RR-0323, RR-0340, RR-0380, RR-0387, RR-0432, RR-0485, RR-0498, RR-0508, RR-0524, RR-0538, RR-0545, RR-0549, RR-0559, RR-0580, RR-0607, RR-0612, RR-0621, RR-0622, RR-0628, RR-0636, RR-0642, RR-0662,	Human rights	There is a risk the PV panels will be procured from China, where they may have been manufactured using slave labour. The extraction of materials used in Scheme components may also involve labour or human rights abuses. Further information is therefore required about the supply chain for the Scheme.	At this stage the final choice of panels is not known and a supplier has not been identified. However, the Applicant recognises that there are risks of modern slavery being connected to UK businesses and supply chains and will comply with all legal obligations regarding modern slavery. Requirement 20 of the Draft DCO requires a Skills, Supply Chain and Employment Plan to be developed. This plan is to substantially based in accordance with the Outline Skills, Supply Chain and Employment Plan [APP-268] submitted with the Application. The procurement strategy will incorporate ethical procurement policies to safeguard the human rights of those working within the supply chain of the Scheme. This requirement will be included within the next iteration of the Outline Skills, Supply Chain and Employment Plan.

Parties	Issue	Summary of issue raised	Applicant's response
RR-0669, RR-0689, RR-0705, RR-0706, RR-0718, RR-0734, RR-0772, RR-0777, RR-0784, RR-0875, RR-0908, RR-0913, RR-0914, RR-0936, RR-1001, RR-1020, RR-1023, RR-1034, RR-1070, RR-1096, RR-1119, RR-1131, RR-1132, RR-1160, RR-1175, RR-1204, RR-1209, RR-1211, RR-1236, RR-1245, RR-1300, RR-1307, RR-1318, RR-1329, RR-1336, RR-1337			
RR-0890	Impact on local climate	The Scheme will cause localised weather effects including more rainfall.	Solar farms have the potential to affect the micro-climate beneath panels, which could impact on the potential growth of certain plant species; however, the Applicant is not aware of scientific literature of solar farms affecting rainfall. The planting and monitoring for the Scheme is provided with the Outline Landscape and Ecological Management Plan [APP-108] .
RR-0241, RR-0242	Impact on local climate	Will the heat generated on the panels cause very turbulent air distribution over a wide area of the countryside?	Solar farms have the potential to affect the micro-climate beneath panels, which could impact on the potential growth of certain plant species; however, the Applicant is not aware of scientific literature of solar farms affecting wind at a

Parties	Issue	Summary of issue raised	Applicant's response
			countryside level. The planting and monitoring for the Scheme is provided with the Outline Landscape and Ecological Management Plan [APP-108] .
RR-1289	Nomenclature	The Grid Connection Statement refers to the Promoter's own substation as the 'Burwell National Grid Substation Extension'. This will need to be renamed as it will not be a National Grid asset	This comment is noted.
RR-0609	Ongoing engagement	Request for ongoing co-operation and communication throughout lifecycle of project to ensure mutually beneficial relationship between Sunnica and the local community	The Applicant is keen to have ongoing communication with the local community throughout the lifecycle of the project, and recognises the benefits of ensuring co-operation over the long term. The Scheme will have an Operation Environmental Management Plan (OEMP) [APP-126] in place for the operation and maintenance of the Scheme. This will include details of how the Applicant will keep the community updated during the operational lifetime of the Scheme. This includes measures such as setting up a dedicated website, signage on site, and a community liaison group to provide a regular means of communicating throughout the lifetime of the project.
RR-0976, RR-0978	Ownership	The Scheme may be sold before the planning process is complete.	The Applicant does not intend to sell the Scheme prior to the completion of the planning process.
RR-1147	Security	Increased risk of theft and undesirables coming into area to steal components of the Scheme.	The Applicant does not agree with this assessment. The design will ensure that the compounds and solar equipment are secure to minimise the potential for damage to occur through criminal activity. Embedded mitigation will include fencing, CCTV cameras and lighting in critical areas. These are described in further detail in Chapter 3: Scheme Description of the Environmental Statement [APP-035]. There will be 17 permanent operations staff present on site during the day in a single shift; this will allow faster responses to an intruder security alert or damage than other solar farms in the UK, which are traditionally unmanned. Furthermore, the Scheme does not process or include large scale chemicals and as such criminal damage to the infrastructure is unlikely to lead to a large-scale leak,

Parties	Issue	Summary of issue raised	Applicant's response
			explosion, or other major event. Therefore, the Scheme is not expected to have an effect on the environment due to the risk of a major accident occurring as a result of criminal activity during operation. Refer to Chapter 16: Other Environmental Topics of the Environmental Statement [APP-048] for further information on major accidents and disasters.
RR-0166, RR-0507, RR-0890	Supply chain	Mining of lithium and cadmium has been carried out unethically.	The Applicant recognises that there are risks connected to UK businesses and supply chains and will comply with all of its legal obligations relating to this.
RR-1029, RR-1119, RR-1131	Supply chain	The mining for the essential components to make the solar panels is not environmentally friendly.	To comply with Environmental Impact Assessment regulations an assessment of greenhouse gas (GHG) emissions over the life of the Scheme was undertaken and is presented in Chapter 6, Climate Change of the EIA [APP-038]. The lifecycle GHG assessment considered GHG emissions during the construction, operation, maintenance and decommissioning of the Scheme. The operational phase takes into account GHG emissions from the operation and maintenance of the Scheme, and also the GHG benefit from the renewable energy generation in the context of the wider energy generation sector and the projected National Grid average GHG intensity. Total GHG emissions from the Scheme over its lifetime are estimated to be 676,008 tCO₂e of which 452,015 tCO₂e are during the construction phase. Over its lifetime this equates to a GHG intensity of 29.2gCO₂e/kWh generated. As presented in Table 6-17 of the Climate Change Chapter of the Environmental Statement [APP-038] this is beneficial compared with the GHG impact of electricity generated using fossil fuels such as natural gas and comparable with other low carbon forms of energy such as wind. Based on the difference between the operational GHG intensity of the Scheme and the projected grid GHG intensity during the operational period, it is estimated that an additional 957,334 tCO₂e would be emitted to generate the equivalent amount of electricity based on the projected grid energy mix. The beneficial impact of the low carbon generation capacity of the Scheme outweighs the GHG impact during

Parties	Issue	Summary of issue raised	Applicant's response
			construction. Overall, the Scheme is considered to have a major beneficial effect on the climate.
RR-0829	Supply chain	The use of non-UK companies to manage and supply equipment is dangerous.	The Applicant disagrees with this assessment. A procurement process will be run ahead of construction to source all of the equipment and labour required for the construction of the Scheme and following the final design of the Scheme. Where possible, equipment and labour will be sourced locally. A requirement in Schedule 2 of the DCO will secure the implementation of a Skills, Supply Chain and Employment Plan to help identify opportunities for individuals and businesses to access employment and supply chain opportunities associated with the construction, operation and maintenance of the Scheme. The Applicant has provided an Outline Skills, Supply Chain and Employment Plan [APP-023] as part of its DCO application. However, it is likely there will be instances where this is not possible as the equipment is best sourced from other countries owing to the lack of manufacturing capacity in the United Kingdom. The procurement strategy will incorporate environmental and ethical procurement policies to minimise potential environmental impacts associated with the procurement of materials and equipment, whilst also safeguarding the human rights of those working within the supply chain of the Scheme. This requirement will be included within the next iteration of the Outline Skills, Supply Chain and Employment Plan.
RR-0520, RR-0550, RR-0581, RR-0607, RR-0836, RR-0875, RR-1026, RR-1036, RR-1070, RR-1131	Supply chain	The ethical sourcing of materials is uncertain.	A procurement process will be run ahead of construction to source all of the equipment and labour required for the construction of the Scheme and following the final design of the Scheme. Where possible, equipment and labour will be sourced locally. A requirement in Schedule 2 of the DCO will secure the implementation of a Skills, Supply Chain and Employment Plan to help identify opportunities for individuals and businesses to access employment and supply chain opportunities associated with the construction, operation and maintenance of the Scheme. The Applicant has provided an Outline Skills, Supply Chain and Employment Plan [APP-023] as part of its DCO application. However, it is likely there will be instances where this is not possible as the equipment is best sourced from other countries owing to the lack of manufacturing capacity in the United Kingdom. The procurement strategy will incorporate environmental and ethical procurement policies to minimise potential environmental impacts associated with the

Parties	Issue	Summary of issue raised	Applicant's response
			procurement of materials and equipment, whilst also safeguarding the human rights of those working within the supply chain of the Scheme. This requirement will be included within the next iteration of the Outline Skills, Supply Chain and Employment Plan.
RR-0012	Workers	Inappropriate increase in the number of workers in the local area.	Chapter 12: Socio-economics and Land Use of the Environmental Statement [APP-044] describes the number of workers required for the Scheme. During construction and decommissioning there are anticipated to be a maximum of 1,685 staff on site. Of this, 1,483 staff are anticipated to be within a 45 minute travel study area, with 202 staff coming from outside of this study area. This has been assessed as having a beneficial effect on local employment. During operation it is anticipated that there will be up to 17 permanent staff onsite, 15 of which are within the 45 minute travel study area and 2 which are outside the study area. This is anticipated to be a negligible effect.

Appendices

Appendix A Supplementary Cumulative Assessment

Cumulative Scheme	Topic	Assessment
Land North of Acorn Way, allocation SA10(a)	Climate Change	Cumulative assessment is scoped out of the Climate Change assessment within Chapter 6: Climate Change [APP-038] of the ES. The IEMA guidance for Assessing Greenhouse Gas Emissions and Evaluating their Significance (2022) confirms cumulative assessment is not relevant or appropriate for the Climate Change chapter. The IEMA guidance states: <i>“All global cumulative GHG sources are relevant to the effect on climate change, and this should be taken into account in defining the receptor (the atmospheric concentration of GHGs) as being of ‘high’ sensitivity to further emissions.</i> <i>Effects of GHG emissions from specific cumulative projects therefore in general should not be individually assessed, as there is no basis for selecting any particular (or more than one) cumulative project that has GHG emissions for assessment over any other.</i> <i>The contextualisation of GHG emissions, as discussed in Section 6.4, should incorporate by its nature the cumulative contributions of other GHG sources which make up that context. Where the contextualisation is geographically – or sector-bounded (e.g. involves contextualising emissions within a local authority scale carbon budget, or a sector level net zero carbon roadmap), then the consideration of cumulative contributions to that context will be within that boundary.”</i>
	Cultural Heritage	Scoped out. The A11 and the existing character of the Red Lodge settlement have both changed the setting of the historic environment. The separation they create between the Scheme and the Land North of Acorn Way, allocation SA10(a) mean that there is no shared setting, therefore the heritage assets will not be cumulatively impacted.
	Ecology and Nature Conservation	It is noted that any future planning applications will require a project level Habitats Regulations Assessment, and that the development must also provide measures for influencing recreation in the surrounding area, to avoid a damaging increase in visitors to Breckland Special Protection Area (SPA) and an increase in recreational activity in adjacent farmland. These measures will be required to avoid adverse effects on the integrity of Breckland SPA and it can be assumed, therefore, a requirement of consent. Any further site specific ecological mitigation will also need to be provided by the development and it can be assumed that no significant residual effects will remain. There is therefore minimal opportunity for cumulative effects during construction, operation or decommissioning.

	Flood Risk, Drainage and Water Resources	The Land North of Acorn Way development is located entirely within Flood Zone 1. There is an area of low surface water flood risk within the site. It appears that this area is a low point forming a surface water storage point. The A11 separates the Land North of Acorn Way development from the Order limits of the Scheme – overland flood flows must be managed to ensure no flood risk increases elsewhere, as a requirement of planning permission, therefore, overland flow would not be permitted to cross the road to breach the Scheme. Furthermore, the planning permission would require that the Land North of Acorn Way development needs to demonstrate they can mitigate the surface water flood risk without increasing flood risk elsewhere. The Land North of Acorn Way development is therefore considered not to affect fluvial or pluvial flood risk within the Order limits of the Scheme. All other sources of flooding should not be affected by the Land North of Acorn Way development (i.e. groundwater, sewer and artificial sources). The Land North of Acorn Way development is located to the northeast of Red Lodge, within the 'Lark downstream of Mill Street Bridge' Water Framework Directive (WFD) water body catchment. It is a distance of over 2.5 km north from the WFD water body. There are no known watercourses in the area from the Ordnance Survey mapping. The Local Plan states the development should have regard to the proper functioning of the existing Sustainable Urban Drainage infrastructure (SuDS) located on the site. The development site is located at over 2.5 km from the nearest waterbody, on the assumption that there will be suitable SuDS installed and maintained to ensure no increase in surface water runoff rates from the site, in line with planning policy, it is considered there would be no cumulative impacts on flood risk, surface water and groundwater resources in the area.
	Landscape and Visual Amenity	Paragraph 10.11.3 of Chapter 10: Landscape and Visual Amenity of the ES [APP-042] states that cumulative <i>"developments of a similar type to the Scheme and that are subject to a valid planning application are included where specific circumstances indicate there is potential for notable cumulative effects to occur"</i>. This development is predominantly residential. It lies mostly within Local Landscape Character Area (LLCA) 15: Red Lodge and partly within LLCA 16: Brecks Estate Heathland. As set out in Appendix 10G of the ES [APP-106], effects on these LLCAs are considered neutral in construction, operation and decommissioning due to the combination of distance and intervening features, meaning that the Scheme would not be perceptible. No cumulative effects on these receptors are predicted. Viewpoint 27 is the only location where there is the potential for cumulative visual effects. Effects on receptors associated with this viewpoint are assessed as neutral in all scenarios, as set out in Appendix 10H of the ES [APP-107], due to the intervening vegetation and distance, the orientation of properties and the raised embankment and roadside fencing, meaning that no part of the Scheme would be visible. Cumulative landscape and visual effects are therefore not likely.

	Noise and Vibration	This is a residential and primary school development so will not result in similar operational noise effects to the Scheme. As the sites are approximately 650m apart at the closest approach and there are no sensitive receptors within this area, no cumulative construction noise effects are expected. Similarly, the distance between sites is sufficient that there will not be cumulative construction vibration effects.
	Socio-Economics and Land Use	The Land North of Acorn Way development has been considered in line with the cumulative assessment undertaken in the Socio-economics chapter of the ES [APP-044], and the cumulative assessment conclusions are still appropriate. The additional construction employment and associated Gross Value Added would not be sufficient to enhance the already beneficial impacts concluded in regard to these effects, and no other cumulative Socio-economics and Land Use assessments would be influenced by this additional development.
	Transport and Access	No planning application has been submitted for the Land North of Acorn Way site. There is currently no information as to when this site will be developed and therefore it is unlikely that the operation of the development would coincide with the construction period for the Scheme. Furthermore, even though the piece of land is close to a key junction, it has been identified for potential residential and employment use and therefore the vehicle peak hours for these uses (08:00-09:00 and 17:00-18:00) are unlikely to occur at the same time as the Scheme construction staff peak hours (06:00-07:00 and 19:00-20:00). Therefore, it is considered there would be no significant cumulative impact of the Land North of Acorn Way traffic and the Scheme.
	Air Quality	The village of Red Lodge was considered as part of the air quality assessment for the Scheme, and no adverse impacts were identified. As such this development will not be affected by the Scheme in terms of air quality.
	Human Health	Based on other topics' assessments of cumulative impacts of the Land North of Acorn Way development (which feed into the Human Health topic), it is not anticipated to result in any additional cumulative impact from a Human Health perspective. The development does not change the following cumulative impacts assessed in the Human Health chapter of the ES [APP-047]: • The Land North of Acorn Way development is not anticipated to change the assessment of 'Access to Healthcare Services and other Social Infrastructure' as the additional residents and traffic movements would not be sufficient to materially alter existing healthcare provision levels or access to these. • The Land North of Acorn Way development is not anticipated to change the assessment of 'Accessibility and Active Travel' as there would be no physical changes to PRow infrastructure in the vicinity of the Order limits or changes to the environment that PRow users are exposed to as a result of the development. • The Land North of Acorn Way development is not anticipated to change the assessment of 'Access to Work and Training'. The construction phases of Scheme and the proposed land North of Acorn Way development would both be expected to generate employment. In the absence of information relating to the construction cost, it is not possible to make a quantitative assessment of the employment likely to be generated from the

		construction stage of the development. It is expected that there would be a cumulative beneficial effect on construction-related employment within the local area. • The Land North of Acorn Way development is not anticipated to change the assessment of 'Air Quality, Noise and Neighbourhood Amenity', there are no anticipated impacts on Air Quality or Noise acknowledged for the Land North of Acorn Way development, so no cumulative impact would be anticipated.
	Climate Change	Cumulative assessment is scoped out of the Climate Change assessment within Chapter 6: Climate Change [APP-038] of the ES. The IEMA guidance for Assessing Greenhouse Gas Emissions and Evaluating their Significance (2022) confirms cumulative assessment is not relevant or appropriate for the Climate Change chapter. The IEMA guidance states: <i>"All global cumulative GHG sources are relevant to the effect on climate change, and this should be taken into account in defining the receptor (the atmospheric concentration of GHGs) as being of 'high' sensitivity to further emissions.</i> <i>Effects of GHG emissions from specific cumulative projects therefore in general should not be individually assessed, as there is no basis for selecting any particular (or more than one) cumulative project that has GHG emissions for assessment over any other.</i> <i>The contextualisation of GHG emissions, as discussed in Section 6.4, should incorporate by its nature the cumulative contributions of other GHG sources which make up that context. Where the contextualisation is geographically – or sector-bounded (e.g. involves contextualising emissions within a local authority scale carbon budget, or a sector level net zero carbon roadmap), then the consideration of cumulative contributions to that context will be within that boundary."</i>
	Cultural Heritage	Scoped out. The development is sufficiently distanced from the Scheme to avoid any cumulative impacts on the setting of the heritage assets. The assets closest to both schemes are the scheduled Moated Site East of the Church of St Nicholas and the Grade II* Church of St Nicholas itself. These are situated approximately 500m to the south of the proposed grid connection for the Scheme and 500m to the east of the Breach Solar Farm. The assessment for Breach Soar Farm has concluded a minor adverse effect on the assets with no effect concluded by the Scheme. There will be no impact caused by Breach Solar Farm in combination with the Scheme below ground at this point and no wider shared views within the landscape.
	Ecology and Nature Conservation	No cumulative effects are anticipated during construction, operation or decommissioning. Appropriate mitigation has been provided by Breach Solar Farm on site to avoid any significant residual effects on important ecological features present, namely, breeding birds, Otter and Water Vole. Measures to protect these species during construction will be secured in the CEMP and a Biodiversity Management Plan. There is therefore minimal opportunity for cumulative effects.

	Flood Risk, Drainage and Water Resources	Parts of the north of the Breach Solar Farm development are located within Flood Zone 3, which partially benefits from flood protection. To attain planning permission, the Breach Solar Farm development would have to demonstrate how they can mitigate the fluvial flood risk and may potentially have to provide flood compensation to ensure the existing flood extent is not affected. Surface water flood risk for the Breach Farm Solar development is considered to be very low. Other potential sources of flooding, including groundwater, sewers and artificial sources are also considered very low risk, from a review of freely available online and desktop mapping. Considering planning policy requirements will ensure the Breach Farm Solar development does not result in adverse impacts to flood risk potential from all sources to other locations elsewhere, it is considered unlikely that the Breach Solar Farm development would have any negative impact on the Scheme's flood risk from any source. This application is for a solar farm, Breach Solar Farm, that is located within the agricultural area west of Snailwell, and within the 'New River' WFD water body catchment. New River is located approximately 270m northeast of the site. There are several land drains within the Breach Solar Farm development boundary. The Flood Risk Assessment confirms the Breach Solar Farm development is not expected to impact flood risk elsewhere. It is assumed suitable SuDS would be installed at the Breach Farm Solar development site, and maintained by those operators, to ensure no increase in surface water runoff rates from the site. During construction of the Breach Solar Farm development there is the potential for cumulative impacts in surface water resources from construction within the same catchment as for the Scheme. However, it is assumed that they would follow good industry practice in terms of the management of construction works and surface water runoff (and risk to groundwater of minor chemical leaks from static and mobile equipment) in the long term, compliant with all relevant environmental legislation, including that related to flood risk. Thus, it is considered there would be no cumulative impacts on flood risk and surface water and groundwater resources in the area.
	Landscape and Visual Amenity	This proposed Breach Solar Farm development lies adjacent to the south of Cable Route B. It is predominantly within LLCA 36: Burwell Fen. Intra-project effects on LLCA 36 are considered to be Moderate Adverse during construction, as set out in Appendix 10G of the ES [APP-106]. Assuming the worst-case scenario, that construction of the Scheme and the proposed Breach Solar Farm would coincide, this would increase the geographical extent of impacts. The resulting effects would be Moderate Adverse and significant, albeit short term and temporary. The cumulative effects of operation and decommissioning would not be significant. A small part of the proposed Breach Solar Farm extends into LLCA 43: Burwell Chalklands. The effects of the Scheme are predicted to be not significant in all scenarios. The additional cumulative effects as a result of the Breach Solar Farm development would not increase the significance of these effects and effects would remain not significant. Viewpoint 50 is representative of people using public rights of way west of Landwade. Appendix 10H of the ES [APP-107] concludes that there would be negligible adverse effects during construction and neutral in

		operation and decommissioning. Whilst it is possible that activities relating to the construction of the Scheme and the Breach Solar Farm would be visible, these would be distant and would not increase the magnitude of impact or significance of these effects. Effects on motorists using the B1102 are assessed with reference to Viewpoint 51. Appendix 10H of the ES [APP-107] concludes that there would be minor adverse effects during construction of the Scheme. Assuming the worst-case scenario that both developments would be under construction at the same time, the addition of the proposed Breach Solar Farm would extend the period of exposure to views of construction along the B1102, albeit at a distance of approximately 800m. The magnitude of cumulative impacts would remain medium and the resulting cumulative effects of construction would be minor adverse, which is not considered significant. Cumulative effects of operation and decommissioning would be not significant. This is because effects in relation to the Scheme during these phases are neutral, with no change to views due to cables being below ground and distance from the receptor.
	Noise and Vibration	The Breach Solar Farm site is approximately 6.5km from the nearest point on the site boundary of the Scheme. As this is substantially outside the study area of 500m, no cumulative noise or vibration effects are expected.
	Socio-Economics and Land Use	There are no changes to the cumulative effect conclusions based on location and scale of development, additional to other cumulative schemes. The Breach Solar Farm development has been considered in line with the cumulative assessment undertaken in the Socio-economics chapter of the ES [APP-044], and the cumulative assessment conclusions are still appropriate. The additional construction employment and associated Gross Value Added would not be sufficient to enhance the already beneficial impacts concluded in regard to these effects, and no other cumulative Socio-economics and Land Use assessments would be influenced by this additional development.
	Transport and Access	The Breach Solar Farm Site is located on Ness Road (B1102) between Burwell and the A142 which is not a key route for the Scheme related vehicles. The location is not located near to the Scheme construction staff car parks and therefore minimal overlap with the Scheme construction staff vehicles is expected. Breach Solar Farm working hours will be 0730-1800 hours. Assuming arrivals and departures in the hour before and after working hours, staff travel on the highway network will only overlap for 30 minutes at 0630-0700 hours. Breach Solar Farm staff trips is forecast at a peak of only 120 movements per day. It is therefore unlikely that there will be a cumulative impact of staff construction travel between the two projects based on very limited potential geographical and temporal overlap of staff travel routeing and low volumes of staff vehicles associated with the Breach Solar Farm. It is acknowledged there could be some overlap of Heavy Goods Vehicle (HGV) routes with the Scheme HGVs travelling to the cable route corridor along Ness Road B1102. However, the Scheme related daily HGVs along Ness Road B1102 are expected to be minimal. Furthermore, the Breach Solar Farm construction programme is only 36 weeks in duration, with the majority of activity being within the initial four week period. There are forecast to be 55 daily two way HGV delivery movements in the first four weeks, with

		only seven two-way movements per day for the remaining 32 weeks. Therefore, it is considered there would be no significant cumulative impact of the construction traffic between Breach Solar Farm and the Scheme.
	Air Quality	Solar Farms do not have significant operational traffic impact due to the minimal trip generation associated with their operation, and therefore there will be no interaction between Breach Solar Farm and the Scheme during operation. Care should be taken if construction periods overlap to ensure no impacts on air quality from Heavy Duty Vehicle (HDV) movements occur, but this would be managed by Construction Logistics Management Plans for the sites. The mitigation measures outlined for inclusion within the CEMP for the Scheme include the requirement for contractors to <i>"hold regular liaison meetings with other high-risk construction sites within 500m of the site boundary (if applicable), to ensure plans are co-ordinated and dust and particulate matter emissions are minimised. It is important to understand the interactions of the off-site transport/ deliveries which might be using the same strategic road network routes"</i> . The Application Boundary for Breach Solar Farm is within 500m of the Scheme and therefore this measure is applicable. It is expected that Breach Solar Farm will have similar requirements listed within the CEMP, and as such, providing this measure is effectively implemented, no cumulative impacts are anticipated to occur.
	Human Health	Based on other topics' assessments of cumulative impacts from the Breach Solar Farm development that inform Human Health assessment, it is not anticipated to result in any additional cumulative impact. The scheme does not change the following cumulative impacts assessed in the Human Health chapter of the ES [APP-047]: • The Breach Solar Farm development is not anticipated to change the assessment of 'Access to Healthcare Services and other Social Infrastructure' as the additional workers and traffic movements would not be sufficient to materially alter existing healthcare provision levels or access to these. • The Breach Solar Farm development is not anticipated to change the assessment of 'Accessibility and Active Travel' as there would be no physical changes to NMU infrastructure in the vicinity of the Order limits or changes to the environment that NMUs are exposed to as a result of the development. • The Breach Solar Farm development is not anticipated to change the assessment of 'Access to Work and Training'. The construction phases of Scheme and the proposed Breach Solar Farm development would both be expected to generate employment. In the absence of commercially sensitive information relating to the construction costs of each of the cumulative schemes, it is not possible to make a quantitative assessment of the employment likely to be generated from the construction stage of the other development schemes. It is expected that there would be a cumulative beneficial effect on construction-related employment within the local area. • The Breach Solar Farm development is not anticipated to change the assessment of 'Air Quality, Noise and Neighbourhood Amenity', there are no anticipated impacts on Air Quality or Noise acknowledge for the Breach Solar Farm development, so no cumulative impact would be anticipated.

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