

# SUNNICA ENERGY FARM

EN010106

Draft Statement of Common Ground with Cambridgeshire County  
Council, Suffolk County Council, East Cambridgeshire District  
Council and West Suffolk Council

Planning Act 2008

Infrastructure Planning (Examination Procedure) Rules 2010



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## **Sunnica Energy Farm**

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# 1 Introduction

## 1.1 Purpose of this document

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared in respect of the proposed Sunnica Energy Farm Development Consent Order ("the Application") made by Sunnica Limited ("Sunnica") to the Secretary of State for Department for Business, Energy and Industrial Strategy ("Secretary of State") for a Development Consent Order ("the Order") under section 37 of the Planning Act 2008 ("PA 2008").
- 1.1.2 The order, if granted, would authorise Sunnica to construct, operate (including maintain) and decommission a ground mounted solar photovoltaic ('PV') farm across Sunnica East Site A, Sunnica East Site B, Sunnica West Site A and Sunnica West B. The Scheme includes the following key components:
- a. Solar PV modules;
  - b. PV module mounting structures;
  - c. Inverters;
  - d. Transformers;
  - e. Switchgear;
  - f. Onsite cabling (including high and low voltage cabling) and cabling between the Sites and to the Burwell National Grid Substation Extension;
  - g. One or more BESS (expected to be formed of lithium ion batteries storing electrical energy) on Sunnica East Site A, Sunnica East Site B, and Sunnica West Site A;
  - h. An electrical compound comprising a substation and control building (Sunnica East Site A, Sunnica East Site B, and Sunnica West Site A only);
  - i. Burwell National Grid Substation Extension should Burwell National Grid Substation Extension Option 2 be taken forward;
  - j. Office/warehouse (Sunnica East Site A and Sunnica East Site B only)
  - k. Fencing and security measures;
  - l. Drainage;
  - m. Internal access roads and car parking;
  - n. Landscaping including habitat creation areas; and
  - o. Construction laydown areas.
- 1.1.3 This SoCG does not seek to replicate information which is available elsewhere within the Application documents. All documents are available in the deposit locations and/or the Planning Inspectorate website.

- 1.1.4 This SoCG has been produced to confirm to the Examining Authority (ExA) where agreement has been reached between the parties to it, and where agreement has not (yet) been reached. SoCGs are an established means in the planning process of allowing all parties to identify and so focus on specific issues that may need to be addressed during the examination.

## 1.2 Parties to this Statement of Common Ground

- 1.2.1 This SoCG has been prepared by (1) Sunnica as the Applicant and (2) Cambridgeshire County Council (CCC), (3) Suffolk County Council (SCC), (4) East Cambridgeshire District Council (ECDC) and (5) West Suffolk Council (WSC).
- 1.2.2 Sunnica is a Special Purpose Vehicle (SPV) incorporated in December 2013 to construct, operate, and decommission the Sunnica Energy Farm.
- 1.2.3 CCC, SCC, ECDC and WSC are interested parties to the Examination of the Application.
- 1.2.4 Collectively Sunnica, CCC, SCC, ECDC and WSC are referred to as 'the parties'.

## 1.3 Terminology

- 1.3.1 In the tables in the Issues chapter of this SoCG:
- a. "Agreed" indicates where the issue has been resolved.
  - b. "Not Agreed" indicates a final position of the parties that is not agreed, and
  - c. "Under discussion" indicates where these points are the subject of on-going discussion wherever possible to resolve, or refine, the extent of disagreement between the parties.
- 1.3.2 It can be taken that any matters not specifically referred to in the Issues chapter of this SoCG are not of material interest or relevance to CCC's, SCC's, ECDC's or WSC's representations and therefore have not been considered in this document. It is recognised however that engagement between all parties will need to continue due to their joint interest in matters arising from the Scheme.

## 2 Record of Engagement

- 2.1.1 A summary of the meetings and correspondence that has taken place between the parties in relation to the Application is outlined in **Table 1**. There has been constant email correspondence between the parties to discuss the sharing of information, arrangement of meetings and for them to comment on draft documentation, but this table reflects the key meetings and correspondence of note that have taken place between the parties.

**Table 1: Record of Engagement**

Date	Form of correspondence	Key topics discussed and key outcomes (the topics should align with the Issues tables)
13/02/2019	Initial Briefing Meeting with ECDC and WSC	Key topics: <ul style="list-style-type: none"> <li>• Introduction to the Scheme</li> <li>• Consultation</li> <li>• Environmental</li> <li>• Programme</li> </ul>
19/02/2019	Initial Briefing Meeting with SCC and CCC	Key topics: <ul style="list-style-type: none"> <li>• Introduction to the Scheme</li> <li>• Planning</li> <li>• Consultation</li> <li>• Environmental and Scoping</li> <li>• Programme</li> </ul>
01/03/2019	Email from Sunnica to the CCC, ECDC, SCC and WSC	Provided advance copy of the community information leaflet.
13/03/2019	Email from Sunnica to CCC, ECDC, SCC and WSC	Provision of the EIA Scoping Report and Transport Scoping Note.
25/03/2019	Initial Briefing Meeting with CCC	Key topics: <ul style="list-style-type: none"> <li>• Introduction to the Scheme</li> <li>• Transport</li> <li>• Archaeology</li> </ul>
03/06/2019	Joint Transport Meeting with CCC and SCC	Key topics: <ul style="list-style-type: none"> <li>• Updates on access points</li> <li>• Cable route</li> <li>• Access routes</li> <li>• Traffic data</li> </ul>
03/06/2019	Email from SCC	Raised concern about lorries from Felixstowe using the Kentford junction and travelling through Kennett.
03/06/2019	Email from Sunnica to SCC	Response to Graham Gunby's concern about lorries from Felixstowe using the Kentford junction and travelling through Kennett.
07/06/2019	Email from SCC	Advice on A14/A11 junction
19/06/2019	Landscape and Heritage Workshop with CCC, ECDC, SCC and WSC	Key topics included: <ul style="list-style-type: none"> <li>• Design updates</li> <li>• Heritage and landscape viewpoints and assessment methodology</li> </ul>
24/06/2019	Ecology Workshop with CCC, ECDC, SCC and WSC	Key topics included: <ul style="list-style-type: none"> <li>• Update from Sunnica on the changes to the Scheme since EIA Scoping</li> <li>• Summary of ecological baseline to date</li> </ul>

Date	Form of correspondence	Key topics discussed and key outcomes (the topics should align with the Issues tables)
		<ul style="list-style-type: none"> <li>Review and discussion of key ecological constraints and consideration of approaches for avoidance, mitigation and enhancement</li> </ul>
17/07/2019	Public Rights of Way (PRoW) Workshop with CCC	<p>Key topics included:</p> <ul style="list-style-type: none"> <li>Design update</li> <li>Viewpoints on PRoWs</li> <li>Permissive paths</li> <li>Green infrastructure</li> </ul>
18/07/2019	Archaeology Workshop with CCC and SCC	<p>Key topics included:</p> <ul style="list-style-type: none"> <li>Design updates</li> <li>Archaeological evaluation strategy</li> <li>Archaeological mitigation strategy</li> </ul>
30/09/2019	Email from Sunnica to ECDC and WSC	Confirmation on methods and monitoring for baseline noise survey
08/10/2019	Email from Sunnica to CCC and SCC	Confirmation of Scheduled Monuments consent for geophysical surveys.
31/10/2019	Planning Performance Agreement Meeting 1 with CCC, ECDC, SCC and WSC	<p>Key topics included:</p> <ul style="list-style-type: none"> <li>Planning Performance Agreement</li> <li>Non-statutory consultation feedback</li> <li>Design updates</li> <li>Local Authority Engagement</li> <li>Cumulative Effects assessment</li> </ul>
20/11/2019	Landscape and Non-Motorised Users Workshop with CCC, ECDC, SCC and WSC	<p>Key topics included:</p> <ul style="list-style-type: none"> <li>Design update and design principles</li> <li>Approach to Non-Motorised Users</li> </ul>
04/12/2019	Ecology Workshop with CCC, ECDC, SCC and WSC	<p>Key topics included:</p> <ul style="list-style-type: none"> <li>Feedback received during non-statutory consultation</li> <li>Ecology surveys</li> <li>Biodiversity net gain</li> <li>Decommissioning</li> <li>Details of lighting</li> </ul>
27/01/2020	Email from Sunnica to CCC	Sharing of the preliminary geophysics report
16/03/2020	Email from SCC	Provision of feedback on the Preliminary Environmental Risk Assessment
07/05/2020	Heritage Meeting with CCC, ECDC, SCC and WSC	<p>Key topics:</p> <ul style="list-style-type: none"> <li>Update on the Scheme design</li> <li>Scheduled Monuments, particularly those around Burwell</li> </ul>



Date	Form of correspondence	Key topics discussed and key outcomes (the topics should align with the Issues tables)
		<ul style="list-style-type: none"> <li>Update on built heritage context for the Scheme (baseline)</li> <li>Geophysical survey progress</li> <li>Proposed trial trenching strategy</li> <li>Structure of the Preliminary Environmental Information Report</li> </ul>
12/11/2020	Email from CCC	Approval of Sunnica West WSI for archaeology trial trenching
16/12/2020	Planning Performance Agreement Meeting with CCC, ECDC, SCC and WSC	Key topics: <ul style="list-style-type: none"> <li>Statutory consultation</li> <li>EIA update</li> <li>Planning policy</li> <li>Programme</li> </ul>
18/12/2020	Email from SCC	Approval of Sunnica East WSI for archaeology trial trenching
16/12/2020	Planning Performance Agreement Meeting with SCC	Key topics: <ul style="list-style-type: none"> <li>Statutory consultation</li> <li>EIA update</li> <li>Planning policy</li> <li>Programme</li> </ul>
05/02/2021	Landscape and Visual Meeting with CCC, ECDC, SCC and WSC	Key topics: <ul style="list-style-type: none"> <li>Landscape assessment methodology</li> <li>Local Landscape Character Areas</li> <li>Visual assessment methodology</li> <li>Viewpoints</li> <li>Design</li> </ul>
26/02/2021	Heritage Meeting with CCC, ECDC, SCC and WSC	Key topics: <ul style="list-style-type: none"> <li>Update on Scheme design</li> <li>Visualisations</li> <li>Fieldwork</li> <li>Feedback from statutory consultation</li> <li>Programme</li> </ul>
01/03/2021	Socio-economics and human health Meeting with CCC, ECDC, SCC and WSC	Key topics: <ul style="list-style-type: none"> <li>Socio-economics</li> <li>Human Health</li> </ul>
17/03/2021	Lead Local Flood Authority and Internal Drainage Board Meeting with CCC and SCC	Key topics: <ul style="list-style-type: none"> <li>Design update</li> <li>Water Environment Features</li> <li>Key issues and scope of assessment</li> <li>Assessment outcomes, mitigation and enhancements</li> </ul>



Date	Form of correspondence	Key topics discussed and key outcomes (the topics should align with the Issues tables)
25/03/2021	Transport meeting with CCC, ECDC, SCC and WSC	Key topics: <ul style="list-style-type: none"> <li>• Design update</li> <li>• Site Accesses</li> <li>• Abnormal loads</li> <li>• Cumulative impacts</li> <li>• Traffic data</li> <li>• Construction period</li> <li>• PRowS</li> </ul>
01/04/2021	Email from Sunnica to CCC, ECDC, SCC and WSC	Provision of technical note outlining the management of heritage areas.
29/04/2021	Heritage and Ecology Meeting with CCC, ECDC, SCC and WSC	Key topics: <ul style="list-style-type: none"> <li>• Heritage offset areas</li> <li>• Stone curlew requirements</li> <li>• Landscape proposals</li> <li>• Grassland planting</li> </ul>
24/06/2021	Email from Sunnica to SCC	Consultation on access route through Worlington at junction adjacent to Walnut Tree Pub
27/08/2021	Email from CCC	Approval of updated archaeological trial trenching plan for the stone curlew plots at Sunnica East.
27/08/2021	Transport update meeting with CCC and SCC	Key topics: <ul style="list-style-type: none"> <li>• Updates on design since PEIR</li> <li>• Update on traffic forecast and trip generation</li> <li>• Site access</li> <li>• Consultation</li> <li>• Burwell substation extension options</li> </ul>
20/10/2021	Email from Sunnica to CCC	Provision of updated Sunnica West Site Archaeological Trial Trenching Report following completion of W01 trenching.
26/04/2022	Meeting between CCC, SCC, WSC and ECDC	Transport matters were discussed in relation to the Relevant Representations and the SoCG. Meeting minutes were distributed following the meeting.
27/04/2022	Meeting between CCC, SCC, WSC and ECDC	Landscape and Visual Amenity matters were discussed in relation to the Relevant Representations and the SoCG. Meeting minutes were distributed following the meeting
27/04/2022	Meeting between CCC, SCC, WSC and ECDC	Socio-economics matters were discussed in relation to the Relevant Representations and the SoCG. Meeting minutes were distributed following the meeting.
04/04/2022	Meeting between Suffolk Wildlife Trust, RSPB, Wildlife Trust BCN (on	Ecology working group meeting in relation to issues raised in the Relevant Representations and development of the SoCGs.

Date	Form of correspondence	Key topics discussed and key outcomes (the topics should align with the Issues tables)
	behalf of ECDC), Natural England, CCC and WSC	
10/05/2022	Meeting between CCC, SCC, WSC and ECDC	Cultural heritage matters were discussed in relation to the Relevant Representations and the SoCG. Meeting minutes were distributed following the meeting.
10/06/2022	Meeting between Suffolk Wildlife Trust, RSPB, Wildlife Trust Bedfordshire, Cambridgeshire and Northamptonshire (BCN) (on behalf of ECDC), Natural England, CCC and WSC	Ecology working group meeting in relation to issues raised in the Relevant Representations and development of the SoCGs.
13/07/2022	Meeting between CCC, SCC, WSC and ECDC	Key topics of discussion included: <ul style="list-style-type: none"> <li>• Traffic survey locations to fill gaps</li> <li>• Construction staff vehicle occupancy – sensitivity test and reliance on mini-buses – parameters for assessment</li> <li>• Proposed Temporary Traffic Management / Site Access Management Plan document – example and structure with one location to be presented for comments.</li> <li>• Link sensitivity for ES methodology.</li> </ul>
14/07/2022	Meeting between CCC, SCC, WSC and ECDC	Key topics discussed included: <ul style="list-style-type: none"> <li>• Changes to the application</li> <li>• Update on Relevant Representations and SoCG</li> <li>• Planning Performance Agreement</li> <li>• Context of the Scheme in relation to s105/104 of the Planning Act 2008</li> </ul>
4/10/2022	Meeting between CCC, SCC, WSC and ECDC and the Applicant	Meeting to discuss Transport Assessment related matters and site access and highways designs.
18/10/2022	Meeting between CCC, SCC, WSC and ECDC and the Applicant	Discussion on the Detailed Archaeological Mitigation Strategy and SoCG.
27/10/2022	Meeting between CCC, SCC, WSC and ECDC and the Applicant	Discussion of documentation submitted at Deadline 1 and look ahead to Deadlines 2 and 3, including completion of draft SoCG for issue.
27/10/2022	Meeting between CCC, SCC, WSC and ECDC and the Applicant	Discussion of socio-economic assessment.

Date	Form of correspondence	Key topics discussed and key outcomes (the topics should align with the Issues tables)
04/11/2022	Meeting between CCC, SCC, WSC and ECDC and the Applicant	Discussion of LVIA assessment.
09/11/2022	Meeting between CCC, SCC, WSC and ECDC and the Applicant	Agreement of SoCG submitted at Deadline 2.

- 2.1.2 It is agreed that this is an accurate record of the key meetings and consultation undertaken between the parties in relation to the issues addressed in this SoCG as at the date of this SoCG.
- 2.1.3 The issues and matters highlighted in **Table 2** to **Table 4** summarise the key issues that have been in discussion between the parties.

## 3 Issues

### 3.1 Matters Agreed

3.1.1 **Table 2** below details the matters agreed with CCC, SCC, ECDC and WSC.

**Table 2: Matters agreed**

Topic	Sub-topic	Details of Matters Agreed
General	Application of expert/professional judgements	<p>The identification of likely significant effects on sensitive features and receptors has been informed by professional judgement and the views of relevant technical specialists, where necessary. The application of professional judgement by its specialists within the following assessments are appropriate and robust:</p> <ul style="list-style-type: none"> <li>Cultural heritage <b>[APP-039]</b>.</li> </ul>
	Legislation and policy	<p>The Scheme should be considered under Section 105 of the Planning Act 2008.</p> <p>NPS EN-1, NPS EN-3, NPS EN-5, and in light of the Government's pronouncements in respect of transitional effects of the draft NPSs, Draft NPS EN-1, Draft NPS EN-3, and Draft NPS EN-5 should be 'important and relevant' considerations for the purposes of S105(2) of the Planning Act 2008.</p> <p>Draft NPS EN-3 contains technology specific policy relating to large-scale solar development. It is considered more relevant in this case than the currently designated EN-3, notwithstanding that it is yet to be designated.</p>
		<p>The parties agree that the Environmental Statement (ES) has identified all applicable legislation and national policy pertaining to the following assessments undertaken as part of the Environmental Impact Assessment (EIA) of the Scheme:</p> <ul style="list-style-type: none"> <li>Climate change <b>[APP-038]</b>.</li> <li>Cultural heritage <b>[APP-039]</b>.</li> <li>Ecology and nature conservation <b>[APP-040]</b>.</li> <li>Flood risk, drainage and water resources <b>[APP-041]</b>.</li> <li>Landscape and visual amenity <b>[APP-042]</b>.</li> <li>Noise and vibration <b>[APP-043]</b>.</li> <li>Socio-economics and land use <b>[APP-044]</b>.</li> </ul>

		<ul style="list-style-type: none"> <li>• Transport and access <b>[APP-045]</b>.</li> <li>• Air quality <b>[APP-046]</b>.</li> <li>• Human health <b>[APP-047]</b>.</li> <li>• Other topics <b>[APP-048]</b>.</li> <li>• Effect interactions <b>[APP-049]</b>.</li> </ul>
Cultural Heritage	Other heritage assets	<p>The settings of other listed buildings (excluding the Chippenham Park complex), conservation areas, non-designated heritage assets on East Cambridgeshire would not be affected by the Scheme and no further mitigation is required.</p> <p>The settings of listed buildings in Suffolk would not be harmed by the Scheme and no further mitigation is required.</p> <p>U6006 Badlingham Lane would not be negatively affected by the Scheme in terms of built heritage or archaeology and no further mitigation is required in this respect.</p> <p>The settings of conservation areas in Worlington, Freckenham, Exning, Barton Mills and Newmarket would not be harmed by the Scheme and no further mitigation is required.</p> <p>Conservation areas in Freckenham and Exning would not be harmed by the Scheme, including by AIL deliveries.</p>

## 3.2 Matters Under Discussion

3.2.1 **Table 3** below details the matters under discussion with CCC, SCC, ECDC and WSC.

**Table 3: Matters under discussion**

Topic	Sub-topic	Details of Matters Under Discussion
General	Local policy	The application of local policy within the Environmental Impact Assessment (EIA) is under discussion.
	Study area definition and extents	<p>The parties agree that the study areas adopted by Sunnica within the following assessments reflect current best practice and standards:</p> <ul style="list-style-type: none"> <li>• Climate change <b>[APP-038]</b>.</li> <li>• Cultural heritage <b>[APP-039]</b>.</li> <li>• Ecology and nature conservation <b>[APP-040]</b>.</li> <li>• Flood risk, drainage and water resources <b>[APP-041]</b>.</li> <li>• Landscape and visual amenity <b>[APP-042]</b>.</li> <li>• Noise and vibration <b>[APP-043]</b>.</li> <li>• Socio-economics and land use <b>[APP-044]</b>.</li> <li>• Transport and access <b>[APP-045]</b>.</li> <li>• Air quality <b>[APP-046]</b>.</li> <li>• Human health <b>[APP-047]</b>.</li> <li>• Other topics <b>[APP-048]</b>.</li> <li>• Effect interactions <b>[APP-049]</b>.</li> </ul> <p>The parties agree that the geographical extents of the adopted study areas are appropriate to identify the likely direct and indirect effects of the Scheme on sensitive features and receptors.</p>
	Application of expert/	The identification of likely significant effects on sensitive features and receptors has been informed by professional judgement and the views of relevant technical specialists, where necessary. The parties agree

Topic	Sub-topic	Details of Matters Under Discussion
	professional judgements	<p>that the application of professional judgement by its specialists within the following assessments are appropriate and robust:</p> <ul style="list-style-type: none"> <li>• Climate change [APP-038].</li> <li>• Ecology and nature conservation [APP-040].</li> <li>• Flood risk, drainage and water resources [APP-041].</li> <li>• Landscape and visual amenity [APP-042].</li> <li>• Noise and vibration [APP-043].</li> <li>• Socio-economics and land use [APP-044].</li> <li>• Transport and access [APP-045].</li> <li>• Air quality [APP-046].</li> <li>• Human health [APP-047].</li> <li>• Other topics [APP-048].</li> <li>• Effect interactions [APP-049].</li> </ul>
Baseline	Data collection methods, baseline data and the identification and sensitivity of relevant features and receptors	<p>The baseline conditions have been collated using desk-based and field-based techniques, and through consultation with stakeholders including the local authorities.</p> <p>The parties agree that the scope, coverage and timing of surveys undertaken to establish the baseline conditions and sensitive features and receptors are in line with best practice and appropriate to inform the assessment of direct and indirect effects reported in the following assessments:</p> <ul style="list-style-type: none"> <li>• Climate change [APP-038].</li> <li>• Cultural heritage [APP-039].</li> <li>• Socio-economics and land use [APP-044].</li> <li>• Air quality [APP-046].</li> <li>• Human health [APP-047].</li> <li>• Other topics [APP-048].</li> <li>• Effect interactions [APP-049].</li> </ul>



Topic	Sub-topic	Details of Matters Under Discussion
Assessment findings	Assessment findings: construction, operation and decommissioning effects	<p>The assessment findings for the following topic assessments are considered acceptable:</p> <ul style="list-style-type: none"> <li>• Climate change <b>[APP-038]</b>.</li> <li>• Air quality <b>[APP-046]</b>.</li> <li>• Other topics <b>[APP-048]</b>.</li> <li>• Effect interactions <b>[APP-049]</b>.</li> </ul>
Air Quality	Mitigation	<p>The measures outlined within Chapter 14: Air Quality <b>[APP-046]</b>, are considered acceptable to mitigate potential impacts and manage potential effects during the construction, operation and decommissioning phases.</p>
Climate Change	Mitigation - Approach to reduce fuel consumption and associated emissions	<p>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 the Framework CEMP <b>[APP-123]</b> and will be developed within the detailed CEMP(s) developed for the Scheme.</p>
Cultural Heritage	Chippenham Park complex and Snailwell Fen	<p>The Scheme will result in less than substantial harm to the setting of the Chippenham Park complex (Grade II registered park, Grade II* and II listed buildings and non-designated heritage asset). The Scheme would impact the setting of Snailwell Fen ancient landscape and will result in less than substantial harm to the setting of the scheduled Roman villa.</p> <p>The inclusion of further mitigation would not be effective in reducing harm to the setting of Chippenham Park complex.</p> <p>It is the Council's position that further mitigation would not be effective in reducing harm to the setting of Snailwell Fen or the riverside setting of the scheduled Roman villa and its associated farm on the opposite bank. A substantial reduction in the extent of the Scheme would be required in order to reduce harm to the setting of Chippenham Park, and exclusion of solar farm infrastructure from W01 would be required in order to reduce harm to the setting of Snailwell Fen and the scheduled Roman villa.</p> <p>Discussion is continuing with Suffolk County Council in relation to non-designated assets.</p> <p>The Applicant is considering its position in respect of these matters and will revert in due course.</p>

Topic	Sub-topic	Details of Matters Under Discussion
	Mitigation Strategy	A Detailed Archaeological Mitigation Strategy will be prepared for discussion with the County Councils, and submitted to the ExA during Examination following receipt of the Councils Brief. The draft DCO [APP-019] provides for the securing of archaeological mitigation through Requirement 13.
Ecology and Nature Conservation	Residual effects	Whether or not the Scheme will result in significant residual effects on ecology and nature conservation during construction and operation of the Scheme.
	Baseline surveys	Given the dynamic nature of some of the priority habitats, e.g. arable flora, and to assist discussions over mitigation and enhancements, updated surveys are being undertaken for priority habitats and flora across the Order limits. These surveys will target areas of permanent grassland and locations where notable arable flora where previously identified and the results will be shared with the local authorities by Deadline 3.
	Assessment – Biodiversity Net Gain	The Applicant is undertaking an updated calculation of Biodiversity Net Gain which will provide the detail for the calculations using the latest Biodiversity Net Gain metric, 3.1 including locations of habitats. A technical note will be produced and circulated to the local authorities at the earliest convenience during the Examination process for discussion.
	Aquatic invertebrates	The Applicant is preparing a I note to provide further technical information to validate its conclusions in respect of aquatic invertebrates this will be submitted at Deadline 2.
	Mitigation	Whether changes to mitigation proposals are required to avoid cabling route in ECO4 negatively affecting Fenland SAC/Chippenham Ramsar site.
	Stone Curlew	Residual effects and the need or otherwise for additional mitigation for Stone Curlew.
	Mitigation	Whether additional detail on top of the commitment to retain a 30 m buffer to avoid impacts on Havacre Meadows County Wildlife Site is necessary prior to the submission and approval of a Construction Environmental Management Plan under Requirement 14 of Schedule 2 of the Draft DCO [APP-019].
	Mitigation	Whether the Outline Landscape and Ecology Management Plan (OLEMP) [APP-108] requires amending to secure adequate monitoring of terrestrial ecology.

Topic	Sub-topic	Details of Matters Under Discussion
	Trees	An Arboricultural Impact Assessment and relevant plans are being prepared and will be submitted at Deadline 3.
Ecology and Nature Conservation and Landscape and Visual Amenity	Mitigation	Further detailed mitigation measures and how habitat creation will link to form a coherent biodiversity network including their long term management are being discussed with the local authorities, and any updates to the OLEMP considered.
Flood Risk, Drainage and Water Resources	Baseline modelling – availability for review	<p>The Flood Risk Assessment Part 1 Rev 1 <b>[AS-007]</b> 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.</p> <p>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.</p> <p>A hydraulic drainage model will be prepared for the BESS and Site Compound areas once these designs are set out at detailed design stage, with the results helping to inform the final detailed 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 principals of the drainage strategy are followed and this will not affect the Environmental Statement findings and conclusions.</p> <p>This approach is to be discussed further with the local authorities.</p>
	Assessment – uncertainty within the Quick Storage Estimates (QSE) calculation	<p>Within the Flood Risk Assessment Part 1 Rev 1 <b>[AS-007]</b> the infiltration SuDS techniques, swales and basins, will be designed to mimic existing drainage conditions and accommodate the 1 in 100 year return period storm event plus a 40% increase allowance for climate change. The strategy 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 availability of land for attenuation is not a significant constraint, if additional attenuation is required, it would be provided within the site boundary.</p>

Topic	Sub-topic	Details of Matters Under Discussion
	Mitigation - exceedance flows	Detailed drainage plans will be developed at detailed design stage. These will include the exceedance flow routes, and level/gradient data. This approach is to be discussed further with the local authorities.
	Mitigation – Flood zone compensation	Floodplain compensation discussions are ongoing with the Environment Agency. The Applicant's position is that the assessments show that no floodplain compensation is required.
Landscape and Visual Amenity	Baseline – Tree survey	In response to comments, the Applicant proposes to undertake a detailed tree survey within the Sites at key areas, including along the U6006.  This additional information will be discussed with the local authorities.
	Assessment – Cumulative effects	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 <b>[APP-042]</b> . This approach is being discussed with the local authorities.  Further assessment will be undertaken to consider the Solar Farm to East of Breach Farm (21/00706/ESF). This will be made available for review by the local authorities.
	Mitigation	The following updates are proposed: <ul style="list-style-type: none"> <li>• A detailed Environmental Masterplan will be developed and provided to the local authorities for information purposes based on the landscape masterplans presented in Figures 10-14a to f <b>[APP-209 to APP-214]</b> of the Environmental Statement. This will include all environmental mitigation and annotations to identify the type and function of the mitigation.</li> <li>• The OLEMP will be expanded to explain the effects of the mitigation proposed in more detail and to provide more detail on species mixes proposed for the different areas of habitat and indicative plant numbers.</li> <li>• A 'per village' design iteration technical note has been prepared for the local authorities to explain how the design has evolved to avoid or mitigate the effect on each village and how the design iterations have responded to the criteria for good design.</li> <li>• A technical note will be prepared for the local authorities outlining the historical development of the landscape across the study area with reference to map regression and online sources.</li> </ul>

Topic	Sub-topic	Details of Matters Under Discussion
Noise and Vibration	Baseline – noise monitoring	Baseline noise monitoring was undertaken in accordance with guidance within BS 4142. 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. This approach is being discussed with the local authorities who were concerned about uncertainty in the baseline background data.
	Assessment – Burwell Substation extension low frequency ‘hums’ from transformers	Following acceptance of non-material changes to the DCO application, the proposed Option 1 Burwell Substation extension no longer forms part of 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.
	Mitigation – S61 applications	The Framework CEMP has been updated, and will be submitted at Deadline 2, to include a requirement for the detailed CEMP to set out proposals for how consultation will take place with local authorities to agree a suitable schedule for S61 applications.
	Mitigation - Piling	The requirement for a Piling Method Statement will be added in the next iteration of the CEMP.
	Mitigation	Whether proposed construction working hours should be reduced.
Socio-Economics and Land Use	Assessment – Employment / GVA figures	The employment assumptions related to travel area/leakage are based on the employment within the 45 minute travel area as derived from Census data. A map of the travel area is included in Figure 12-1 of the Environmental Statement <b>[APP-237]</b> . The total employment is presented in Chapter 12: Socio-economics and Land Use of the Environmental Statement <b>[APP-044]</b> . The data table underpinning this can be provided to the local authorities for review and discussed if required.
	Assessment – Tourism effects on local economy	The Applicant’s EIA Scoping Report <b>[APP-051]</b> 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 <b>[APP-052]</b> 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 <b>[APP-042]</b> did assess the impact on visitor views in the vicinity of the Scheme and the loss of long distance views as relevant. This approach is

Topic	Sub-topic	Details of Matters Under Discussion
		being discussed with the local authorities who were concerned that the Scheme will have negative impacts on the natural beauty and tourism within the local area.
	Mitigation – Compensation package for local communities	An Outline Skills, Supply Chain and Employment Plan has been submitted as part of the DCO Application <b>[APP-268]</b> . This seeks to secure the potential improvements, mitigation and compensation to local communities that could be implemented as part of the Scheme.  This approach is to be agreed with the local authorities.
Transport and Access	Baseline – Traffic surveys	The Local Highways Authorities have raised concerns regarding the coverage of baseline traffic survey data, recognising that it was not possible to collect new representative survey data prior to the submission of the DCO application. To address these concerns, the Applicant has proposed to undertake targeted additional traffic survey data in July 2022, as well as Non Motorised User (NMU) surveys on PRowS proposed for temporary closure. The methodology and scope of surveys was provided to the Local Highways Authorities in advance, with opportunity to comment (none received). The results of these additional surveys will be discussed with the local authorities.
	Assessment - Vehicle occupancy	Discussions will continue with the Local Highways Authorities in relation to sensitivity testing of to the 1.5 staff vehicle occupancy rate used in the Transport Assessment <b>[APP-117]</b> and Framework Construction Traffic Management Plan and Travel Plan <b>[APP-118]</b> and further evidence supporting the robustness of the 1.5 staff vehicle occupancy rate.
	Assessment – width of Elms Road	Discussions will continue in relation to the extent of road widening and the provision of passing places required at Elms Road to facilitate the passage of HGVs and other traffic during construction.
	Assessment – A14/A142 junction	The Local Highways Authorities have raised a potential safety concern regarding the U-turn movement required at the A14/A142 J37. The Applicant have reviewed this location in more detail. Further to this, SCC has identified an improvement scheme being proposed as part of West Suffolk Council Planning application DCON(F)/13/0408. The Applicant has agreed to review these proposals and respond to the Local Highways Authorities in terms of the potential to alleviate the potential safety concern.

Topic	Sub-topic	Details of Matters Under Discussion
	Assessment – Like sensitivity	During a meeting in April 2022, the Local Highways Authorities stated that the link sensitivity assigned to a number of highways and Non-Motorised Users (NMUs) within the Environmental Statement is not yet agreed. The LHAs have proposed to set out the areas of disagreement, for discussion with the Applicant. Thus, the appropriateness of the Applicant's approach is under discussion.
	Mitigation – Fly parking	During the meeting with the Local Highways Authorities in April 2022, a Community Liaison Officer was identified as required during the construction and decommissioning phases to act as a liaison between the contractor and the public to ensure fly parking does not occur.  The relevant documents to be updated to reflect this are being discussed with the local authorities, and updates to the Framework CEMP <b>[APP-123]</b> are being considered.
	Site Access Proposals	Discussions are continuing with the Local Highways Authorities in relation to the site access proposals. The Local Highways Authorities in a meeting in April 2022 have requested a standalone package of plans to collate the information required to assess the site access proposals. The Local Highways Authorities' requirements for this package is under discussion, and the Applicant intends to prepare such a document to support the Local Highways Authorities' in their assessment of the Scheme.
Human Health	Assessment – quality of life	In response to concerns about the effect of the Scheme on quality of life, 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: <ul style="list-style-type: none"> <li>• Chapter 10: Landscape and Visual Amenity of the Environmental Statement <b>[APP-042]</b>;</li> <li>• Chapter 11: Noise and Vibration of the Environmental Statement <b>[APP-043]</b>;</li> <li>• Chapter 12: Socio-Economics and Land Use of the Environmental Statement <b>[APP-044]</b>;</li> <li>• Chapter 13: Transport and Access of the Environmental Statement <b>[APP-045]</b>;</li> <li>• Chapter 14: Air Quality of the Environmental Statement <b>[APP-046]</b>; and</li> <li>• Chapter 15: Human Health of the Environmental Statement <b>[APP-047]</b>.</li> </ul>
	Mitigation - Fire safety	In response to concerns about fire safety, the draft Development Consent Order <b>[APP-019]</b> 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.
Discharge of Requirements	Fee agreement	Fees to be paid by the undertaker to the relevant Planning Authorities for applications to discharge Requirements is under discussion.



### 3.3 Matters Not Agreed

3.3.1 **Table 4** below details the matters not agreed with CCC, SCC, ECDC and WSC.

**Table 4: Matters not agreed**

Topic	Sub-topic	Details of Matters Not Agreed
None	None	None