SUNNICA ENERGY FARM

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Volume 8

8.50 Applicant's Response to Written Representations

Planning Act 2008

Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

28 November 2022
Revision 00

Planning Act 2008

The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

Sunnica Energy Farm

Development Consent Order 202[x]

8.50 Applicant's Response to Written Representations

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1 Introduction

1.1 Purpose of this document

1.1.1 This report responds to the Written Representations submitted at Deadline 2 on 11 November 2022. It is structured as follows:

- Section 2 – the Applicant has responded to the Written Representations of 22 parties individually in this section. These Written Representations raise specific issues related to the Scheme that the Applicant considers are best responded to on an individual basis.

- Sections 3-4 – the Written Representations of parties who raised issues relating to compulsory acquisition are responded to both individually (three parties) within Section 3 and thematically (five parties) within Section 4. The three parties that are responded to individually are on the basis of specific concerns they have raised, whereas the remaining parties raised more general concerns relating to compulsory acquisition which could be responded to thematically.

- Section 5 – the Applicant has responded to the remainder of the Written Submissions thematically in this section, under the following 31 themes:

    - Need
    - Client Design
    - Land
    - Consultation
    - Environment/Planning Design
    - Planning
    - Alternatives
    - Environment – General EIA
    - Environment – Climate
    - Environment – Built Heritage
    - Environment – Archaeology
    - Environment – Ecology
    - Environment – Water
    - Environment – Flood Risk Assessment (FRA)
    - Environment – Landscape and Visual (L&V)
    - Environment – Socio-economics
    - Environment – Transport
    - Environment – Air Quality (AQ)
    - Environment – Human Health

- Environment – Glint and Glare
- Environment – Ground Conditions
- Environment – Major Accidents
- Environment – Waste
- Environment – BESS – Fire Safety
- Environment – Soils
- Environment – Noise
- Environment – Arboricultural
- Environment – BESS
- Funding
- Legal

1.1.2 The Applicant notes the quantity of materials received at Deadline 2. These were published on the Planning Inspectorate's website on the 16 November 2022. The Applicant is grateful to the Examining Authority's procedural decision of 8 November creating Deadline 3A and providing a longer period for responses to Written Representations. However, even with that new deadline in place there has been just 8 working days to respond to the Written Representations. There are several instances where the Applicant has not been able to provide a full response to matters raised by interested parties (for example reports provided in appendices) and a fuller response will be submitted to the examination at a later date.

1.1.3 In particular it is noted that the response to the Written Representation of Say No To Sunnica contained within this document has focussed on the 'front-end' written representation submitted by the group. The Applicant is giving further consideration to the appendices to that Written Representation that were also submitted and will provide a response to those appendices (where it is considered necessary and relevant to do so) at a later date.

1.2 List of parties whose Written Representations are responded to individually in Section 2

Reference	Party
REP2-112	Cambridgeshire County Council
REP2-115	Chippenham Parish Council
REP2-129	Dr Edmund Fordham
REP2-131	East Cambridgeshire District Council
REP2-143	Historic England
REP2-148	Isleham Parish Council

Reference	Party
REP2-185	Lucy Frazer MP and Matt Hancock MP
REP2-195	Mildenhall High Town Council
REP2-203	Eversheds Sutherland on behalf of National Grid Electricity Transmission PLC (NGET)
REP2-204	Eversheds Sutherland on behalf of National Grid Gas Plc (NGG)
REP2-206	Addleshaw Goddard LLP on behalf of Network Rail Infrastructure Limited
REP2-207	Newmarket Town Council
REP2-219	Ramblers, Newmarket and District Group
REP2-220	Reach Parish Counci
REP2-223	Red Lodge Parish Council
REP2-240	Say No To Sunnica Action Group Ltd
REP2-244	Snailwell Parish Council
REP2-246	Suffolk County Council
REP2-248	Suffolk Wildlife Trust
REP2-252	The British Horse Society
REP2-260	West Suffolk Council
REP2-263	Worlington Parish Council

1.3 List of parties who had issues related to compulsory purchase that are responded to individually in Section 3

Reference	Party
REP2-130	Womble Bond Dickinson (UK) LLP on behalf of Drug Development Solutions Limited, LGC Limited and LGC Bioresearch Limited
REP2-144	Bryan Cave Leighton Paisner LLP on behalf of HPUT A Limited and HPUT B Limited
REP2-255	Bidwells on behalf of the Mitcham family

1.4 List of parties who had issues related to compulsory purchase that are responded to thematically in Section 4

Reference	Party
REP2-097; and REP2-184	A.G Wright & Son (Farms) Ltd; and Lucinda Wright
REP2-133	Elizabeth Mary Garget
REP2-161	Joanna Reeks
REP2-183	Louise Skole Andreasen
REP2-216	R. F. Tilbrook & Sons

1.5 List of parties whose Written Representations are responded to via thematic responses in Section 5

Reference	Party	Reference	Party
REP2-097	A G Wright & Son (Farms) Ltd	REP2-177	Kevin Hempson
REP2-098	Alan B Smith	REP2-178	Kevin Pallant
REP2-099	Alan Bampton	REP2-179	Lady Frances Peyton Hospital Almshouse Charity
REP2-100	Alan T Richardson	REP2-180	Liam MacGillivray
REP2-101	Andrew John Geddes	REP2-181	Linda Homan
REP2-102	Andrew Munro	REP2-182	Lorraine Stone
REP2-103	Anne Noble	REP2-183	Louise Skole Andreasen
REP2-104	Annette Flindall	REP2-184	Lucinda Wright
REP2-105	Archie Wright	REP2-186	Marianne Corbin
REP2-106	Barbara Murfitt	REP2-187	Mark and Cecelia Hawley
REP2-107	Benoit Herinckx	REP2-188	Mark Caswell
REP2-108	Brenda Knowles	REP2-189	Martin Attree
REP2-109	Brian Challis	REP2-190	Martin Swaffer
REP2-110	Brian Robert Barrow	REP2-191	Matt Hankins
REP2-111	Bruce Knight	REP2-192	Michael Stone
REP2-113	Carole Thomas	REP2-193	Michael Wallis
REP2-114	Celia Clarke	REP2-194	Mike Alder

Reference	Party	Reference	Party
REP2-116	Chris Hall	REP2-196	Mr Steven Gladwin
REP2-117	Christopher Corbin	REP2-197	Mrs Grace Piletto
REP2-118	Claire Mills	REP2-198	Mrs Helen Palmer
REP2-119	Coral Fuller	REP2-199	Mrs J Malkin
REP2-120	CPRE Cambridgeshire and Peterborough	REP2-200	Mrs Linda Porter-Cohen
REP2-121	Dale Hing	REP2-201	Mrs Samantha Munro
REP2-122	Daniel Hilsden	REP2-202	Mrs Susan Swaffer
REP2-123	Deborah Blackwell	REP2-205	National Horseracing Museum
REP2-124	Denis Field	REP2-208	Nick Harvey
REP2-125	Diana Jones	REP2-209	Nicola Espley
REP2-126	Discover Newmarket	REP2-210	Nicole Langstaff
REP2-127	Dr Alastair Burn MBE	REP2-211	Nigel Cooper
REP2-128	Dr Catherine Judkins	REP2-212	Oliver Rubinstein
REP2-132	Ed Lubbock	REP2-213	Peter Knowles
REP2-133	Elizabeth Mary Garget	REP2-214	Peter Maxwell
REP2-134	Erin Holland	REP2-215	Peter Moggridge
REP2-135	Fergus Wright	REP2-216	R F Tilbrook & Sons
REP2-136	Fiona Maxwell	REP2-217	Rachel Howe
REP2-137	Peter Goodyear on behalf of Fordham (Cambs) Walking Group	REP2-221	Rebecca Dunlop
REP2-138	Fordham Parish Council	REP2-222	Rebecca Humphrey
REP2-139	Freckenham Parish Council	REP2-224	Richard and Tracey Minshull
REP2-140	Friends of Isleham Nature Reserves	REP2-225	Richard Furlonger
REP2-142	Helen Faulkner	REP2-226	Richard Hurlock
REP2-145	Ian Garget	REP2-227	Richard Radcliffe
REP2-146	Ian Maclaren	REP2-228	Roger Osborn
REP2-147	Isabel Cross	REP2-229	Rosalind Hamill
REP2-149	Isleham Society	REP2-230	Roy Clarke

Reference	Party	Reference	Party
REP2-150	Isobel Newport-Mangell	REP2-231	Royal Worlington & Newmarket Golf CLub
REP2-151	J Tapster	REP2-232	Rupert Osborn
REP2-152	Jack Smith	REP2-233	S. Hall
REP2-153	James Thorp	REP2-234	Sally Hempson
REP2-154	Jane George	REP2-235	Sam Lee-McCloud
REP2-155	Jane Grant	REP2-236	Sandie Geddes
REP2-156	Jean Mullin	REP2-237	Sara Beckett
REP2-157	Jeanette Malkin	REP2-238	Sara Caswell
REP2-160	Jessica Wright	REP2-239	Sarah Fellows
REP2-161	Joanna Reeks	REP2-241	Selina Boyce
REP2-162	Joanne Cant	REP2-242	Sian Chilcott
REP2-164	John Gosden Ltd	REP2-243	Simon Stafford
REP2-165	John James	REP2-245	Solar Compaign Alliance
REP2-166	John Leitch	REP2-247	Suffolk Preservation Society
REP2-167	Jonathan Pearce	REP2-249	T Clover Racing Ltd
REP2-168	Joseph Pattison	REP2-251	The Ark Church Isleham
REP2-169	Josie Jennings	REP2-253	The Jockey Club
REP2-170	Julia O'Dwyer	REP2-254	The Jockey Club Rooms, Bedford Lodge Hotel, The Best Western Heath Court Hotel, National Horse Racing Museum
REP2-171	Julie Thornalley	REP2-256	The Newmarket Stud Farmers Association
REP2-172	Justin Fuga	REP2-257	The Travellers Community Elms Farm
REP2-173	Karin Dobbie	REP2-258	Tim French
REP2-174	Kate James	REP2-261	Will O'dwyer
REP2-175	Katherine Stewart	REP2-262	William Jarvis, Chair of Newmarket Trainers Federation
REP2-176	Kelvin Morgan		

2 Interested Parties Written Representations and the Applicant's individual responses

2.1 REP2-112 Cambridgeshire County Council

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
REP2-112	Environment – Archaeology	2.3, 2.4, 2.5, 2.6-2.8, 2.9-2.13, 2.15, 2.16 and 2.17	2.3: Update to submission documents 2.4: DAMS 2.5: HEMP 2.6-2.8: W01 Omission from Scheme 2.9-2.13: Aircraft Crash Site in E05 2.15: Post-Consent Archaeological Timescales 2.16-2.17: Articles 16 and 17	2.3: The Applicant notes this requirement. 2.4: The Applicant notes the requirement to develop the DAMS to account for all development impact areas; and it continues to work with the LPAs to achieve this. 2.5: The Applicant will prepare a detailed Historic Environment Management Plan (HEMP) for inclusion in the Landscape Environment Management Plan (LEMP). The HEMP has not yet been included in the LEMP as it is to be in accordance with a brief currently being prepared by the Joint LPA's. 2.6-2.8: The Applicant notes the Council's view in respect of this site, and a further update is provided in the Heritage and Substation Connection Update also submitted at Deadline 3A. 2.9-2.13: The Applicant has undertaken further research into the military aircraft crash site and following consultation with the Joint Casualty and Compassionate Centre (JCCC) is applying for a licence in accordance with Section 4 of the Protection of Military Remains Act 1986. The licence will be accompanied by report containing information derived from the recent research into the crash. As set out in the Heritage and Substation Connection Update, it is considered that it is appropriate for the JCCC, as the Government's body for dealing with military remains, to determine whether or not a licence should be issued for solar activities in and around the crash site. Should the licence be refused, the Applicant will not undertake development within a 100m radius) from the centre of the crash impact crater (as is stipulated within the schedule of the licence application form by JCCC) and as shown on the plan appended to the Heritage and Substation Connection Update. The

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				applicant respectfully disagrees with the Council that there is a strong likelihood of human remains lying in wreckage that could not be recovered by the USAF but accepts that this is a possibility. The Applicants research includes review of the War Departments official report (IAW EO 13526 Accident Aircraft report 46-060) that provides details on the crash including a number of detailed photographs which show the extent of the destruction. The War Departments official report states this as 'complete destruction' in several sections of the report. It is also stated that all "forward motion ceased on impact" and this is attested by the photographs of the impact crater and fragmentary remains of the aircraft. The chalk geology would have certainly prevented the deep burial of any large parts of the aircraft front section. Due to the size of the explosion, the remains of the aircraft were recovered from a very wide area. In terms of the recovery of the remains of the deceased aircrew, the report is conflicting in that it records that "all personnel positively identified" and "unidentified" in separate sections. The circumstances of the B-50 crash are such that the Applicant does not consider the Councils reference the Holme Fen Spitfire Crash (1940) to be a relevant comparison. The Spitfire was a much smaller, single seater fighter, aircraft which did not carry bombs. The Spitfire crashed, during the early stages of WWII, in a fen environment resulting in the deep burial of the aircraft engine and sadly the death of the pilot. The remains of the aircraft's engines were recovered at over 6 m depth. The B-50 Crash was the result of an engine fire igniting the bomb payload and full fuel tanks while in low level flight. The aircraft began to break up in the air and was completely destroyed on impact. The official report is clear that no significant parts of the aircraft were buried. In addition, as a result of the research, it is the Applicant's view that the USAF would have undertaken a very thorough recovery operation and that no significant remains of the aircraft will remain at the site. For the same reason, it is

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				unlikely, but still possible, that fragmentary human remains may exist at the site. The Applicant fully recognises the sensitivity of the crash site but respectfully disagrees with the Council and that the protected area should be fenced off to allow public access or that a monument at the crater site itself is appropriate. Instead, the Applicant wishes to propose that, a 'Crash Site Exclusion Area' comprising a 50m x 50m area be excluded from development. The Crash Site Exclusion Area would be centred on the immediate area of the crash impact crater. The Applicant proposes that an elevated marker post is erected at the location of the Cras Site Exclusion Area to be viewable from the Beck Road and permissive path to the south west. The Applicant proposes that a commemorative plaque and information on the crash could also be installed at a suitable location by the path and road. This will allow the crash site to be considered from a sufficient distance to provide an understanding of the aircraft's final flight path from Lakenheath and the proximity of the crash site from the village of Isleham. 2.15: The forthcoming DAMS will include a detailed programme for Post-Consent Archaeological Works including timescales for Phase 2 Archaeological Evaluation, the delivery of Post-Excavation Assessments and Updated Project Design. 2.16-2.17: Please see the Applicant's response to paragraphs 7.47-7.48 of the Local Impact Report [REP3-019]. Further information on these matters will also be able to be included in HEMPs.
REP2-112	Environment – Ecology	3.3	Fenland SAC Chippenham Fen Ramsar, Chippenham Fen and Snailwell Poor's Fen SSSI - information on the effects of the solar panels on aquatic macroinvertebrates.	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 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

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
			Stone Curlew – effectiveness and amount of offsetting land provided. Panels should be removed from parcel E12 (and potentially parcels E05 & E13) which should be retained as Stone Curlew habitat. Notable arable flora – effectiveness of and location of proposed compensation for impact to arable flora. High quality arable field margins of W09 should be retained. Compensation areas should be expanded.	vegetation and location and orientation of the panels. In addition, a technical note was submitted at Deadline 2 [**REP2-038**] which considers this issue further emphasising that the 20+ metre barrier in the form of the tree belt around Chippenham Fen combined with the distance between waterbodies in Chippenham Fen and the nearest solar array will prevent any aquatic insects reaching the solar panels. In any event, it is noted that, as set out in the Heritage and Substation Connection Update document also submitted at Deadline 3A that the Applicant proposes to remove Sunnica West Site B from the Scheme, which is the closest site to the SSSI/SAC, therefore removing potential impacts. The Applicant disagrees that it is necessary to remove panels from parcels E12, E05 and E13. Stone Curlew has a fluid distribution within the farming landscape of the Order limits and surrounding area and 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 such the nesting locations can vary annually depending on this availability, including whether the species nests within E12, E05 and E13. The Scheme has taken this fluid nesting distribution into consideration and sought to avoid blocks of land where regular nesting attempts have been observed *e.g.,* those in ECO3. This principal of avoidance has guided the locations of the offsetting areas which have taken into account not only 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 maximise delivery of habitat creation and nesting plot opportunities and allow for efficient management. Therefore, it is not considered appropriate to solely rely on past nesting locations as an indicator of siting offsetting habitat, i.e., removing panels from any field which has previously supported a nesting attempt, but to consider the wider use of the Order limits and

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				surrounding to create a permanent (for the lifespan of the project) and joined up block of nesting and foraging habitat. 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, including parcels E12, E05 and E13. Alternative mitigation measures, including the creation of Stone Curlew nesting plots in arable fields outside the Order limits were considered, but the ability of the Scheme to incorporate the creation of permanent grasslands with managed nesting plots within the Order limits and thus not requiring third party land, was considered the optimal solution for not only providing, but securing, long term, high quality nesting and foraging habitat for the Stone Curlew population occurring within and surrounding the Order limits. The use of nesting plots is a proven method for providing suitable nesting habitat for Stone Curlew in Breckland and is supported by the RSPB information note 'Managing nest plots for stone-curlews'. 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)) and secured by the OLEMP: 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. Additionally,

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				there is scope to use the Stone curlew mitigation areas for arable flora as in Breckland. With specific reference to W09, as well as creating disturbed ground plots, for annual plant species, the existing arable field margin in the south west corner of the field will be retained as an archaeological exclusion zone and further extended (see Landscape Masterplans [**REP3-022**]).
		3.5	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.	Biodiversity net gain only needs to be reported for the duration of the Project, i.e. during the operational phase and it is likely that this 40 year period will exceed that recommended from the Environment Act. In any event, the Applicant's submitted BNG Assessment (and which will be updated in due course to the Examination) [**APP-259**] demonstrates that the Scheme will deliver BNG during its operational phase. This would be able to be confirmed at detailed design stage, by the update to the assessment provided as part of the detailed LEMPs (as committed to at Deadline 3) [**REP3-011**]. 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.
		3.6	There is insufficient detail about the BESS including type and scale to define the impact on watercourses and hydrologically linked wildlife sites, wetland habitats and associated species.	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

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				[**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.
		3.7	Proposed mitigation measures are inadequate to mitigate adverse impact to Havacre Meadows and Deal Nook County Wildlife Site. The County Council seeks detailed design of the proposed cable route crossing at W3 (County Wildlife Site) be provided to demonstrating no construction works within 30m of the County Wildlife Site and no impact to habitats / hydrology from tunnelling.	Horizontal Directional Drilling is being proposed at Havacre Meadows and Deal Nook CWS with entry and exit pits set back from the boundary of the CWS to conform to the 30 m buffer zone. This will be able to be confirmed through the detailed Construction Environment Management Plan, in light of the commitment to do this being set out in the Framework CEMP [**REP3-015**]. The profile of the cable pipe is very small compared to the extent of the aquifer and therefore is not anticipated to impede groundwater flow contributing baseflow to rivers and other groundwater dependent water features. No monitoring is therefore required.
		3.8	Not all of the hedgerows/trees identified for works in connection with the abnormal indivisible loads on	**Unnamed Road and Beck Road Junction**

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
			Unnamed Road and Beck Road Junction, Newmarket Rd (B1103)/Isaacson Road junction, Burwell, Reach Road(B1103)/Weirs Drove, Burwell, have been assessed as part of the Preliminary Bat Roost Appraisal Report (figures 2.1-2.9, Appendix 8J - Report on Surveys for Bats, ES [**APP-087**]). It is therefore not possible to determine the level of impact of these works.	This area was within the scope of the Preliminary Bat Roost Appraisal Report and a single tree to north was surveyed and classified as low roost suitability (tree 598) (therefore only requiring precautions if impacted). This tree to the north is unaffected by the Proposed Scheme including AIL access. The vegetation to the south that might require minor pruning to facilitate the AIL access comprises a hedgerow with no mature trees, and would be scoped out of a preliminary bat roost appraisal. For clarity this has Negligible bat suitability (i.e. it has been assessed and scoped out of further bat roost survey or precautionary working). Hedgerows are not assessed for roosting bats unless they contain suitable trees. **Newmarket Rd (B1103)/Isaacson Road junction, Burwell** This comprises a garden hedge dominated by privet that may require trimming back to facilitate AIL access. It does not provide suitable habitat for roosting bats. The garden trees further to the east are retained and not impacted. **Reach Road(B1103)/Weirs Drove, Burwell** This comprises open grassland verge and a small patch of scattered hawthorn scrub. The small patch of scrub may require trimming to facilitate AIL access. This does not provide suitable habitat for roosting bats.
		3.9	The Construction Environmental Management Plan (CEMP) does not provide sufficient details to demonstrate that biodiversity will be adequately mitigated through the construction phase.	The Applicant respectfully disagrees with this comment. The Framework CEMP contains a comprehensive suite of mitigation measures, which will be developed further post consent with the detailed CEMPs. The CEMP has developed further in the course of Examination, including at Deadline 3 [**REP3-015**], and the Applicant would welcome specific requests from the Council as to what else it considers could be added, at this stage of project development.

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		3.10	Landscape Environmental Management Plan (LEMP) does not provide any detailed design, management or monitoring of the proposed habitats / key features	The detailed information on such aspects as design, management or monitoring of the proposed habitats / key features will be provided in the detailed LEMP post consent. However, at Deadline 3 the LEMP was updated with more detailed Environmental Masterplans to provide greater understanding of the principles of the Applicant's approach [**REP3-011**].
		3.11	It is essential that adequate monitoring provisions are put in place and secured, during the construction, operation, and decommissioning phases.	The Applicant recognises the essential role of monitoring based on sound baseline data and monitoring during and post-construction. This is secured within the LEMP, as updated at Deadline 3 [**REP3-011**].
		3.12	The scheme, including 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.	The Scheme will not remove landscape enhancements at the point of decommissioning as 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. Predicting with any certainty the decommissioning of the Scheme in the context of biodiversity is difficult given the changes that are likely to occur in legislation, policy and practice with respect to biodiversity. The key to the Scheme's response to such changes is in the Ecology Advisory Group as an interactive and sustainable vehicle for dealing with biodiversity matters, able to respond within its own terms of reference and membership as the times change, as secured through the updated LEMP submitted at Deadline 3.
REP2-112	Environment – Water		Due to the high-level nature of the submitted information to date, the Applicant has not demonstrated that the sites can deliver mitigation that	The Applicant respectfully disagrees and considers that the attenuation features proposed within the Order limits will deliver mitigation which complies national and local policy, relevant

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			is compliant with National and Local Policy, Guidance and Best Practice within the Order Limits.	guidance and best practice for mitigation. This has been demonstrated within the Flood Risk Assessment [**AS-007**] which includes the Drainage Strategy [**AS-010**] which outlines the attenuation features. It has been agreed by Suffolk County Council in their Written Response [**WR-148**] that they agree that the implementation of high quality SuDS measures can be decided in the post consent phase of the project through requirement.
REP2-112	Environment – FRA		Infiltration rates are of concern to the council, and the lack of infiltration testing carried out to date. Groundwater vulnerability needs to be taken into account. There is uncertainty over the use of Quick Storage Estimates that have been used, and state that more attenuation may be required. FEH Handbook rainfall data is required. The surface water hydraulic model needs to reflect this. The proposals require a more detailed drainage layout to be provided. Plans showing exceedance routing of surface water in the event of system exceedance or system failure should be provided. This should ensure that any overland flows do not adversely impact any surrounding land or property. No details are provided on the maintenance tracks and how water will be managed from these surfaces. As these would be subject to use by vehicles, any surface water management scheme for these surfaces must treat water suitably to ensure pollutants are not discharged into groundwater.	It is noted Suffolk County Council [**WR-148**] agrees that that the implementation of high quality SuDS measures can be decided in the post-consent phase of the project through requirements. Refer to Local Impact Report Reference Table Row 7 and ExA Response to Q1.11.1 for commentary on infiltration. It is noted the current site largely already infiltrates to ground with the desktop GI [**APP-122**] describing ground conditions across the site to corroborate this assumption. The Scheme is not increasing peak runoff rates and volumes from PV field areas. A ground investigation will be secured as part of DCO requirement 12, post DCO consent to confirm groundwater positions and monitoring to facilitate detailed design of SuDS features. SuDS features are proposed to be no deeper than 600mm taking into account potential shallow groundwater. The ground investigation methodology is secured with Requirement 14, the Framework CEMP [**REP3-015**], Table 3-10 Ground Conditions. This states that intrusive site investigation will provide geo-environmental data to evaluate soil and groundwater quality and verify the conceptual site model. Verification of the conceptual site model will include the depth to groundwater within the areas investigated. Refer to ExA Applicant Response to Q1.11.2 for commentary on groundwater protection. Groundwater vulnerability has also been assessed within the FRA, with any mitigation required to be

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			Ordinary watercourse consent applications will be required for works within the Order limits. It is unclear at this time the extent of watercourse works that are required for the scheme. Any culverts within the scheme should only be where they are required and of a minimum length to protect the surrounding watercourse networks. High intensity storms in the first few years could damage any planting around the site along the PV row driplines, and therefore could lead to levels of rilling within the scheme. This can lead to increased flood risk to downstream areas. Maintenance and monitoring for vegetation should be carried out particularly after heavy periods of rainfall, to ensure that there is no damage. Any damage to the planted areas should be repaired/reinstated as soon as possible. This should be incorporated into the appropriate management plan.	confirmed post DCO consent. Shallow swales are proposed to mitigate as far as reasonably practicable at this stage. Refer to Relevant Representation CCC-33 for QSE commentary. 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 [**AS-010**]) 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. The applicant confirms FEH data has been used to re-assess the QSE results and the drainage strategy has been amended to reflect. This will be included in an FRA Addendum report to be issued to PINS. Refer to our response to Relevant Representation CCC-34 contained within 8.6 The Applicant's Responses to Relevant Representations [**REP1-016**] regarding drainage hydraulic modelling and layout. 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

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				climate change, have been used for solar panel sites to confirm swale design and sizes. The modelling will ensure the principles of the drainage strategy are followed. Detailed drainage designs and requirements will be secured within Requirement 12 of the DCO. Refer to Relevant Representation response CCC-37 for commentary on Exceedance flow route plans. These will be secured within Requirement 12 of the DCO and provided at detailed design stage. Suffolk County Council [**WR-148**] agrees that that the implementation of high quality SuDS measures can be decided in the post-consent phase of the project through requirements. Regarding Access tracks, Annex F of the FRA [**AS-010**] includes an assessment following the best practice Simple Index Approach as described in the CIRIA SuDS Manual 2nd edition (2015) to demonstrate the required type of mitigation to protect groundwater resource for the DCO Scheme during operation. Maintenance tracks are to be permeable material, in line with draft NPS EN-3, and with infrequent traffic movements and represent minimal risk to the water environment and do not require treatment by SuDS. The Applicant notes the comment for Ordinary Watercourse consent. The Applicant proposes to disapply the requirement for among other matters, consent under section 23 of the Land Drainage Act 1990 but to do so will require the agreement of the relevant drainage authorities, see the Applicant's Consents and Agreements Position Statement [**REP2-016**] for further details. The Applicant notes the final comment, with suitable planting to prevent risk of riling to be agreed post DCO consent, with a maintenance schedule to be prepared. Rilling of the soil will not lead to increased flood risk downstream, as runoff is intercepted by the swales.

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REP2-112	Environment – L&V		The Applicant has not adequately assessed the impact of the development on users of PROW as visual receptors in the landscape. This is particularly the case for equestrian users on Public Bridleway No. 5 Snailwell on the southern boundary of Sunnica West Site A.	Effects on users of PROW are assessed as part of the Landscape and Visual Impact Assessment summarised in Chapter 10 of the ES [**APP-042**]. This identifies visual receptors using Bridleway 204/5, which connects Snailwell with the A1304 north east of Newmarket. Users of this PRoW are represented by three viewpoints. The majority of the route is separated from the DCO Site by dense vegetation adjacent to the PRoW. Viewpoint 39 is located within the avenue of trees south of Chippenham Park to the south of the A14 trunk road and viewpoint 40 is slightly further north on the bridge across the A14. Effects of construction relating principally to Sunnica West Site A are predicted to be minor adverse due to the abundance of existing vegetation along the route; these effects are not significant. Viewpoint 41 is located on higher ground close to Snailwell, beyond where the existing shelter belt to the south ends. Views across the landscape to the north east are more open and effects are predicted to be moderate adverse during construction along this short section, which is considered significant. Effects on sequential views related to users of Bridleway PRoW 204/5 between Snailwell and the A1304 would not be significant in operation. This is due the distance, limited extent of views and short section of the routes affected. People riding horses along Bridleway 204/5, as represented by VP39, VP40 and VP41, would experience significant effects relating to a short section on elevated ground close to the settlement of Snailwell. These effects would be limited to the construction phase. The effects of operation (assessed at year 1 and year 1) and decommissioning would be not significant.
REP2-112	Environment – Socio-economics		The ES has not assessed the PRoW as historic features within the landscape, and has not proposed any measures to enhance them e.g., through the creation of permanent new PRoW to enable connectivity that would assist the long term health	The assessment of the historic environment has identified public rights of way where they have historic significance and are classified as heritage assets. One such public rights of way has been identified, being U6006 which forms part of the Icknield Way. The U6006 is outside of the developable area of the

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			and well-being of local communities and non-motorised Users. For a development of this large size and impact on local communities, opportunities to enhance PRoW provision in the area has not been realised.	Scheme and it will not be physically impacted, except for a small section within Suffolk where the proposed vehicle access and cable crosses this route. 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. 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 [**REP2-012**]. The Permissive Paths are not intended to be a public highway, as they will be removed upon decommissioning in order for the land to be returned to landowners. Requirement 21 of the draft DCO [**REP2-012**] requires the approval by the relevant planning authority 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.
REP2-112	Environment – Soils (agriculture)		ALC Review commissioned by SNTS Assessment of Cable Route as per Draft EN-3 Support from irrigation understated Loss of land capable of food production.	SNTS have commissioned an ALC assessment from Patrick Stephenson. This assessment does not comply with the ALC Guidelines (MAFF 1988), or the recommendations given by Natural England TIN049. Firstly the assessment work is outside of the Sunnica site. Secondly, the drought grades given are not based upon soil droughtiness calculations as per the ALC Guidelines. Draft EN-3 is still a draft. On cable routes, paragraph 2.48.14 is ambiguous on when a soil assessment of a cable route should be carried out. After directing that ALC soil survey data should inform soil management for construction, decommissioning and operations, the paragraph states *"This should be extended to the underground cabling and access routes."* Clearly this could apply

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				to a work undertaken as a condition of consent as is the current practice. The ES chapter 12 [**APP-044**] and Appendix 12B [**APP-115**] note that irrigation is used by each of the host farm businesses to support high value cropping in rotation with non-irrigated crops. However water abstraction for irrigation is controlled by abstraction licences and these can be curtailed in response to drought. Summer drought conditions in 2022 are likely to constrain water availability into the 2023 growing season. Access to irrigation water is not secure and this light land is limited to grade by a significant drought constraint. The Applicant has already set out in its response at Procedural Deadline B [**PDB-001**] why food security/production is not a principal issue for consideration in the examination, but instead it is the use of BMVL that should be examined given it is BMVL that falls within planning policy and specifically the Energy NPSs, draft Energy NPSs and the NPPF. The Energy NPSs, draft Energy NPSs and the NPPF do not refer to food security in relation to the determination of applications for energy generation schemes. This is a conscious decision by Government.
REP2-112	Environment – Transport		Issues raised are those set out in the LIR.	Please refer to the Applicant's response to the Local Impact Report for a comprehensive response.

2.2 REP2-115 Chippenham Parish Council

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REP2-115	Consultation	Appendix 2	The pre-application consultation that was carried out was inadequate.	The Applicant has consulted in a way that meets its obligations set out in the Statement of Community Consultation (SoCC), the Planning Act 2008 and other relevant regulations. This was confirmed as adequate through the acceptance of the DCO Application for Examination.
REP2-115	Consultation	Appendix 2	There was a lack of access to information during the pre-application statutory consultation, including access to the Preliminary Environmental Information Report (PEIR).	The Applicant considers that the consultation brochure provided an appropriate, non-technical, overview of the Scheme. The Applicant consulted in accordance with 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**]. The PEI Report was published and available for download from the Applicant's website free of charge. Given the size of the PEI Report, the Applicant agreed to make hard copies of the PEI Report available at a cost of £0.35 per page. Copies of the PEI Report were also made available beyond what was set out in the SoCC. In addition hard copies of the core chapters of the PEI Report were made available upon request to parish councils in the area around the Scheme to display in a way that adhered to government guidance on COVID-19. These parish councils included: Freckenham Parish Council, Chippenham Parish Council, Worlington Parish Council, Fordham Parish Council, and Barton Mills Parish Council, Exning Parish Council and Red Lodge Parish Council.
REP2-115	Consultation	Appendix 2	The remote 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

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				on the Applicant's pre-application consultation can be found in the Consultation Report [**APP-026**].
REP2-115	Consultation	Appendix2	The Applicant should have provided for more 'face-to-face' discussions during the statutory consultation.	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 rules imposed as a result of the coronavirus pandemic, 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 be appropriate and adequate, 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-026**].
REP2-115	Consultation	Appendix 2	The maps presented in the consultation materials were difficult to read.	The maps included in the consultation booklet (Appendix G-4 of the Consultation Report [**APP-029**]) were available for download from the Applicant's website. This allowed the user to zoom in on specific points on the map. The Applicant recognises that not everyone can easily read the maps when presented at A4 or smaller and were happy to make A3 copies of the maps available on request. Contact details to request this were included within the consultation booklet and were published in print media.
REP2-115	Consultation	Appendix 2	Consultation materials were posted in unmarked envelopes.	The Applicant advertised the consultation in accordance with the methods identified within the SoCC (Appendix D-2 of the Consultation Report [**APP-028**]) which was prepared in consultation with host local authorities. The Applicant also went beyond these methods and placed further advertisements in local publications during the consultation period. These adverts were presented with similar font sizes to the text within the newspaper itself. In each case, a freephone telephone number was listed within the advert to enable anyone with an interest in the consultation to contact the project team directly. Further details of the Applicant's consultation

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				advertisements are included within the body of the Consultation Report [**APP-026**].
REP2-115	Consultation	Appendix 2	The statutory consultation webinars were an inadequate means of finding out further information and questions asked were not answered.	The Applicant provided several ways for people to find out more information during the statutory consultation including webinars with online Q&A sessions, telephone surgeries and by including email, post and freephone contact details in consultation materials. During the webinars, the Applicant answered as many questions as it could. This included extending the time of webinars to take additional questions and publishing responses to any questions that could not be answered during the webinars on its website. The nature of some questions meant that it was not possible to give a full response during the statutory consultation as the proposed design was still evolving and the environmental information presented in the Preliminary Environmental Information Report (PEI Report) was preliminary in nature. This is common practice during statutory consultation and does not represent a refusal by the Applicant to answer questions.
REP2-115	Consultation	Appendix 2	The statutory consultation was not long enough given the pandemic.	The Applicant considers the length of the consultation to have been adequate. The SoCC included a consultation period significantly longer than the statutory minimum of 28 days and this was developed in consultation with the host local authorities. The consultation period was extended by 16 days in part in view of the enhanced public health measures relating to the COVID-19 pandemic adopted by the Government at a national level from 5 November 2020 until 2 December 2020, and also in light of minor changes made to the red-line boundary. The Applicant received a higher level of response to the consultation than the non-statutory consultation, demonstrating high engagement from consultees despite the presence of COVID-19 restrictions at the time.
REP2-115	Consultation	Appendix 2	There were inaccuracies in the consultation information.	The Applicant disagrees with this assessment. The consultation material has been prepared to inform and to enable consultees to give feedback on the Scheme. Copies of the Applicant's consultation materials are available in the Consultation Report appendices [**APP-027** to **APP-031**].

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REP2-115	Consultation	Appendix 2	The promotion of the consultation was inadequate.	The Applicant disagrees with this assessment. The Applicant's consultation adverts and activities are included in the Consultation Report [**APP-026**] and Consultation Report appendices [**APP-027** to **APP-030**].
REP2-115	Consultation	Appendix 2	There was no means of tracking that responses were received.	The Applicant confirmed receipt of responses when asked to. The Applicant had regard to the responses received in the Consultation Report Appendix J-1 to J-5 [**APP-030**].
REP2-115	Consultation	Appendix 2	There were mistakes in the Statement of Community Consultation (SoCC).	The Applicant does not consider this to undermine the validity of the SoCC. 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.
REP2-115	Environment – Climate	Section 5	Concerns that the overall carbon footprint of the scheme outweighs the benefits, following the report produced by Cranfield University.	Please refer to the response provided to WR-142 (see Appendix A: Applicant's response to Cranfield University's report on carbon emissions).
REP2-115	Environment – Built Heritage	Appendix 19	High Lodge, located at the southern end of the Chippenham Park has been identified as a non-designated heritage asset pending addition to the East Cambridgeshire District Council buildings of local interest register	The Applicant acknowledges that High Lodge is a building of heritage interest. Non-designated heritage assets within 1km of the Scheme were assessed within the ES Chapter 7 – Cultural Heritage [APP-039]. High Lodge falls outside this area. The Applicant accepts that High Lodge also has significance in its relationship to Chippenham Hall RPG, particularly the Avenue and that changes which affect the Avenue have the potential to impact the building. However, it is considered that the building will not be significantly affected due to the severance already caused by the A14.
REP2-115	Environment – Built Heritage	Appendix 19	Substantial harm would be caused to Chippenham Park RPG. Additional landscape would increase this harm.	The impact on the Chippenham Hall RPG has been assessed within Chapter 7 – Cultural Heritage of the ES [**APP-039**] and harm identified in Appendix D of the Planning Statement [**APP-263**].

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				Harm has been identified in relation to the RPG. This is assessed as being less than substantial. Historic England are in accordance with this conclusion. It is acknowledged that the greatest level of harm is caused to the Avenue which forms part of the RPG. The Applicant has taken into consideration the particular significance of the Avenue and its historic function within the landscape mitigation strategy which includes both setbacks and vegetation enhancement (paragraph 7.6.4 of the ES [**APP-039**]). This balances the need to screen the Scheme with the historic ability to view the parkland from the Avenue.
REP2-115	Environment – Built Heritage	Appendix 19	There are other locations in the area that could and have accommodated solar development, which has not substantially harmed the setting of historic assets	ES Chapter 7 [APP-039] and Appendix D of the Planning Statement [APP-263] assess the impact of the Scheme on heritage assets. It concludes that it will not result in substantial harm to heritage assets. Historic England agree with this conclusion [**REP2-143**]. ES Chapter 4, Alternatives and Design Evolution [**APP-036**] and ES Appendix 4A, Alternative Sites Assessment [**APP-054**] explain how the applicant identified a suitable site for the Scheme and explain the options considered and the reasons for the Applicant's decision. This included consideration of heritage assets.
REP2-115	Environment – Ecology	10 c	Chippenham Fen will be surrounded by fields of solar panels and batteries. This in itself and the construction and disturbance in the nearby fields may alter the behaviours, nesting and breeding habits of local wildlife	Chippenham Fen will have solar arrays only to its south-west by about 250 m. Chippenham Fen is not surrounded by fields of solar panels and there are no batteries in its vicinity. Both direct and indirect impacts to Chippenham Fen and 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 [**REP3-009**], 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

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				[**APP-040**]) and construction noise and lighting (Table 8-9), and will be secured through the Framework Construction Environmental Management Plan [**REP3-015**]. 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 outlined in Framework Operation Environmental Management Plan [**APP-126**] and secured through the DCO. Notwithstanding all of the above, as a result of the matters set out in the Heritage and Substation Connection Update also submitted at Deadline 3A, the Applicant now proposes to remove Sunnica West B from the Scheme, removing any potential for impacts to Chippenham Fen from this part of the Scheme.
REP2-115	Environment – Landscape and Visual		The parish council expresses concerns relating to the loss of rural landscape, far-reaching views and vistas. They assert that Chippenham will be hemmed in by fields of	Chippenham (LLCA 23A) is a small, linear settlement adjacent and to the north of the Chippenham Park Registered Park and Garden (RPG). Trees and woodland around the village provide enclosure. The settlement of Chippenham is approximately 1km north of

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			solar panels and this will radically change the setting of the village and that walking or cycling will be through solar panels protected by 2.5m high wire mesh fencing. The parish council consider that there is a lack of any meaningful mitigation to compensate for the industrial landscape and that the mitigation itself will look unnatural in the historic landscapes. Views will be lost by planting trees and hedges to disguise the panels and they will not effectively prevent the overriding impression and feeling of harmful industrialisation of the area.	Sunnica West Site A. The Applicant does not agree that Chippenham will be hemmed in by fields of solar panels. The closest parts of the Scheme to the village of Chippenham lie to the south of Chippenham Park, occupying intensively managed arable farmland south of La Hogue Road. There is no public access to this area. There are few public rights of way in the area and all within the parish are north of Chippenham Park. The Landscape and Visual Impact Assessment summarised in Chapter 10 of the ES [**APP-042**] identifies adverse visual effects of construction relating to Cable Routes A (VP29), but effects in operation would be not significant. As explained in paragraph 3.6.7 of the DAS, a design decision was made between statutory consultation and submission of the Application to omit parcels W13, W14 and W16 adjacent to Chippenham Park in response to feedback received from stakeholders, including local planning authorities. This moved the northern boundary of Sunnica West Site A approximately 600m further south and avoided encircling La Hogue Farm. As noted in paragraph 10.6.309 of the LVIA [**APP-042**], the ZTV shows no visibility of the Scheme across Chippenham or Chippenham Park. This is confirmed by VP30 from Chippenham High Street, illustrated in Figure 10.54A and 10.54B [**APP-227**]. This figure shows that intervening vegetation and buildings screen views of the land within the Order limits from within Chippenham. Similarly, for VP31 in Figure 10.55A [**APP-227**] and VP32 within Chippenham Park shown in Figure 10.98A to 10.98C [**APP-228**], vegetation and the tall boundary wall would screen views of the Scheme. Updated ZTVs were submitted at Deadline 1 [**REP1-008** to **REP1-013**]. Effects on LLCA 23A are assessed as neutral in construction, operation and decommissioning [**APP-106**]. For visual receptors, significant effects are predicted for people using public right of way 49/7 represented by viewpoint 29 in construction relating to the cable route between Sunnica East Site B and Sunnica West Site A. However, effects on people's views related to viewpoints 30 and 31

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				and viewpoint 29 in year 1 and year 15 of operation and decommissioning will be not significant [**APP-107**]. The planting proposed will be effective in screening solar panel arrays and retaining longer distance views. For example along La Hogue Road it is set back to preserve views west to the boundary wall of Chippenham Park. It is sensitive to context and in relation to Sunnica West Site A will reinforce the existing landscape patterns of hedgerows and woodland shelter belts which characterise the existing landscape.
REP2-115	Environment – Socio-economics		Newmarket is the 'headquarters' of racing worldwide and the horseracing industry is important to the local economy.	A Horseracing Industry Impact Assessment [**REP2-040**] has been submitted by the Applicant. This concludes that there are no compelling reasons to show that the horseracing industry will be impacted detrimentally in its operations or longer term viability as a result of the Scheme.
REP2-115	Environment – Transport		Traffic impact during construction. Mostly in terms of impact on local villages and the walking and cycling environment.	The construction of the Scheme will result in additional traffic on the local highway network during the construction period. The impact on the local highway network will therefore be a short term and temporary impact. The Transport Assessment [**APP-117**] and the Transport and Access chapter of the ES [**APP-045**] assess the peak of the construction phase. The peak number of daily staff vehicles is forecast in month nine with 937 staff vehicles, whereas the average over the construction period is 653 vehicles Therefore, the assessment of the construction staff traffic in the Transport Assessment [**APP-117**] and the Transport and Access chapter of the ES [**APP-045**] is robust. As part of the embedded mitigation for the scheme, the construction staff will travel to / from the site outside of the highway network peak hours in order to avoid peak time capacity impacts, representing an efficient use of the highways network. The working hours are secured under the draft DCO, with reference to requirement 14 which secures the measures set out in the Construction Environmental Management Plan [**REP3-016**].

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				Table 13-33 in the Transport and Access chapter of the ES [**APP-045**] details that peak construction period traffic will not result in significant effects for vehicle travellers in terms of driver delay, accidents and safety. In addition, the peak construction traffic will not result in significant effects on Non-Motorised Users (NMUs) in terms of severance, pedestrian delay, pedestrian/cycle amenity, fear and intimidation and accidents and safety. The Framework Construction Traffic Management Plan and Travel Plan [**REP3-014**] ("F-CTMP & TP") provides the commitment at 7.3.2, from the Applicant for the Transport/Travel Plan co-ordinator to "liaise proactively as appropriate with local transport and traffic groups, local planning authorities, local highway authorities, National Highways, and the police, Parish Councils, the public, and the East of England Ambulance Service NHS Trust (EEAST). To include recording and collating any complaints relating to transport aspects of construction activities." Paragraph 7.4.7 of the F-CTMP & TP requires reporting on information on complaints received on transport related issues including parking. As part of the Framework Construction Traffic Management Plan and Travel Plan [**REP3-014**], the Transport Coordinator will produce a monitoring report that will be made available to the relevant local planning authorities and relevant highway authorities to ensure compliance with the measures outlined and that action is being taken where breaches are occurring.
REP2-115	Environment – BESS – Fire Safety	4 a. & b.	Concerns on BESS fire risks	In recognition of the concerns raised by interested parties the Applicant has updated the outline Battery Fire Safety Management Plan [**REP2-032**] and submitted it for Deadline 2. It is considered this provides a detailed plan which ensures that the final design of the BESS will be acceptable and that in the unlikely event of a fire it would be managed safely ensuring the safety of site staff, first responders and the wider community.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
	Environment – BESS – Fire Safety	4 c.	Environmental concerns for firefighting water safe capture	The revised outline Battery Fire Safety Management Plan also specifies capacity and indicative location of bunded lagoons to capture water run-off. BESS areas and drainage channels will integrate impermeable materials to ensure runoff water will not escape. Bunded lagoon design allows for easy analysis of water content and safe extraction by tankers if environmental pollution safety levels are exceeded.
	Soils (agriculture)	3	3a – Poor quality land can not grow the variety of crops seen on site 3b – landowners have refused to let an independent soil expert onto the site 3c – Land is high yielding (data in Chippenham PC Apx 5) 3d – agricultural employment 3e – reservoirs would not be built to service poor land 3f – food security 3g – land will not return to agriculture after 40 years 3h – soil will be irreparably damaged under solar farm	3a, c, e – Natural England document TIN049 describes the best and most versatile land as follows *"This is the land which is most flexible, productive and efficient in response to inputs and which can best deliver future crops for food and non food uses such as biomass, fibres and pharmaceuticals."* Soils in this area are predominantly shallow with a light texture (low clay content) that retain a limited volume of crop available water. In conjunction with a local climate that is relatively warm and dry, soil droughtiness is the dominant limitation to ALC Grade. TIN049 also states *"The Classification is concerned with the inherent potential of land under a range of farming systems. The current agricultural use, or intensity of use, does not affect the ALC grade."* All of the occupying farm businesses have water abstraction licences for irrigation. This irrigation is not used to enhance good land but to remedy the deficiency of droughty land. Each abstraction licence is for a limited volume of water and this is reserved by each farm for high margin crops such as potato where the moisture content at harvest is an important factor for crop quality. Abstraction licences can be and are curtailed for both aquifers and surface waters, most recently 2022. When this occurs the yield and quality of surviving crops is compromised and the considerable farm investment in irrigation is stranded. Chippenham Parish Council give a table of yield in their appendix 5, but do not provide any units eg tonne per hectare. Regardless, as

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				TIN049 notes, the ALC grade is not dependant on the land use or intensity of land use. As stated in The Applicant's Responses to Relevant Representations [**REP1-016**], 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 is lower quality agricultural land, not Best and Most Versatile land (BMV). The ALC assessment (to determine the grades of the soil, and therefore the amount of BMV within the Order limits) 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. Irrigation reservoirs are present in the area. These are used with surface water abstraction licences where the water is taken overwinter for application in the following growing season. In contrast water abstracted from the aquifer as it is used in the growing season. Following the 2022 summer drought, owners of these reservoirs face being able to abstract little to no river water for the 2022-23 winter period, which will force a significant reduction in irrigation dependant cropping for 2023. The reservoirs are connected to dedicated mains that take the water to fields for connection to irrigators. These mains extend to fields outside of the Sunnica site so will continue in use through the life of the solar farm. 3b – The land owners are under no obligation to let an agronomist commissioned by Say No To Sunnica on to their land. This agronomist has submitted a report assessing ALC grade at fields outside of the Sunnica site. This assessment however attempts to assign a drought grade without any evidence that Moisture Balance

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				values have been calculated – a key requirement for determining the drought limitation for ALC. Three different ALC surveys have been used for land within the Sunnica site including one from a minerals application and one prepared by MAFF. All three assessments concur on the nature of the soils present and the limitation on ALC Grade. 3d – UK farming is currently experiencing significant shortages of farm labour. Therefore were the Solar development to result in a drop in the numbers of work hours required, this would likely be subsumed within the overriding labour shortage. 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. 3f – Chippenham Parish Council reference the Defra 2021 UK food security report. Theme 2 of this report covers UK Food Supply Sources. The Key messages for this theme are reproduced below. • The UK has diverse and longstanding trade links that meet consumer demand for a range of products at all times of the year. Trade is dominated by countries in the EU and it is too early to say what effect leaving the EU might have on that trade. • Domestic production is also stable, with variations in yield and consumer demand balanced by imports and exports. Both agricultural production and manufacturing have become increasingly efficient and are geared towards meeting consumer demand, although food waste is still high. • The biggest medium to long term risk to the UK's domestic production comes from climate change and other

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				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. The following paragraph notes that the 60% figure has remained stable for the last two decades, and in terms of the crops that can be economically produced in the UK, this production to supply ratio has remained at around 75%. Chippenham Parish Council's Concern regarding food security is misplaced and amounts to unjustified speculation regarding food security. In addition, the Applicant has already set out in its response at Procedural Deadline B [**PDB-001**] why food security/production is not a principal issue for consideration in the examination, but instead it is the use of BMVL that should be examined given it is BMVL that falls within planning policy and specifically the Energy NPSs, draft Energy NPSs and the NPPF. 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. 3g, h – Chippenham PC claim that they do not regard it as likely that the land will be returned to agriculture. They do not give a justification for this claim. Similarly, they state that soils under solar will be irreparably damaged. In actual fact, sustained cultivation of land is a prime driver in the decline in soil health that we currently see on our arable land. Within the solar farm the land will be under a sustained fallow with year round green cover. This will enable a recovery of soil organic matter, facilitate rainfall infiltration and remove periods of exposed soil vulnerable to wind and water erosion. On removal of the solar farm the farmers will have soil with improved structural resilience, improving options for sustainable agricultural management.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				The Scheme is required, by a DCO requirement, to be decommissioned pursuant to an approved Decommissioning Environmental Management Plan (DEMP). That requirement is enforceable against the person with the benefit of the Order and failure to comply is a criminal offence. The Framework DEMP [**REP2-028**] requires the land to be returned to the landowner as follows, in order to allow continuation of previous activities (subject to landscape and ecological mitigation): *Landscape and ecology mitigation will be left in situ following decommissioning; however, the Scheme will be returned to the land owner in a condition where the previous farming activities, those undertaken prior to construction, could be undertaken.* In addition, measures have been included in the Framework Construction Environmental Management Plan [**REP3-015**] (Table 3-7), Framework Operational Environmental Management Plan [**REP2-030**] (Table 3-6) and the Framework DEMP (Table 3-7) aimed at protecting the soil resource during construction, operation and decommissioning of the Scheme.

2.3 REP2-129 Dr Edmund Fordham

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
REP2-129	Environment – BESS – Fire Safety			Dr Edmund Fordham's submissions are substantial and detailed. A response is provided below but the Applicant is aware that these matters will be discussed at the forthcoming hearings and will expand its response as necessary after those hearings.
		Summary 1	Size of BESS container comments	In recognition of the concerns raised by interested parties and as part of the Applicant's commitment to incorporate the latest BESS safety standards and codes for Sunnica. The Applicant has issued an updated outline Battery Fire Safety Management Plan [**REP-032**] and submitted it for Deadline 2. It is considered this provides a more detailed safety outline which ensures that the final design of the BESS will be acceptable and that in the unlikely event of a fire it would be managed safely ensuring the safety of site staff, first responders and the wider community. The updated outline Battery Fire Safety Management Plan has identified red flag BESS design features that will not be accepted at the detailed design stage. The Applicant is very aware of the impact of BESS container design and site layout safety implications. The BESS fire safety team has studied many of the global BESS incident reports to help inform red flags for the Sunnica BESS design template and to establish key safety protocols to inform drafting of Emergency Response Planning (ERP) documentation at the detailed design stage. BESS ventilation systems are a key safety feature for any lithium-ion BESS system. BESS ventilation and gas exhaust systems will be validated during UL 9540A testing and / or 3rd party fire and explosion testing. At a minimum the exhaust system will conform to NFPA 69 explosion prevention standards as referenced in the outline Battery Fire Safety Management Plan. The BESS fire suppression system must be able to operate

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				effectively in conjunction with the ventilation / gas exhaust system. NFPA 69 exhaust rate is designed to keep gas level under 25% of LFL (Lower Flammable Limit) and exhaust gases away from BESS openings. Controlled and automatic removal of flammable gases protects first responders and toxic gases are removed in a controlled way allowing for dispersion modelling to be reliably integrated into Emergency Response Planning (ERP). Assumptions have been made that that each individual Sunnica BESS container will contain 5-10MWh of battery systems, it should be noted that a significant proportion of BESS systems entering the market during 2022-2023 are cabinet design systems containing 700KWh – 3MWh per container.
		2, 3, 4, 7 & 8	HSC requirement and Controlled Quantity (CQ) assumptions and Explosive Article comments.	The Applicant notes that calculations used in the WR are derived from a very limited number of small-scale lithium-ion battery abuse studies and are not relevant to the Sunnica DCO process. The updated outline Battery Fire Safety Management Plan [**REP2-032**] clarifies the BESS system selected for Sunnica will have completed UL 9540A testing which defines and quantifies gas emissions produced during thermal runaway at BESS cell and module level. It will be patently clear at the detailed design stage if an HSC is required, estimates in this WR are not relevant. In UL 9540A testing (using the WR example of NMC battery chemistry), this is typically tested for gases and metals including: Carbon Monoxide, Carbon Dioxide, Hydrogen, Sulfur Dioxide, Nitrogen Oxides, Hydrogen Fluoride, Hydrogen Cyanide, Hydrogen Chloride, Hydrocarbon gases (THC content), PAHs, etc. Particle capture by XRF analysis checks for:

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				Phosphorus, Aluminium, Nickel, Silicon, Calcium, etc. With regard to comments made about battery cells being considered explosive articles, this is a matter of speculation. UL 9540A testing defines maximum cell and module overpressures and burning velocity. Other fire data recorded at module level is Peak Heat Release Rate (PHRR), Heat Release Rate (HRR), Total Heat Release (THR), cell propagation rates, temperatures with modules, and deflagration event data i.e. debris or shrapnel (if observed). If debris or shrapnel is ejected during UL 9540A module, unit or installation level testing then the design is "non-compliant" and designs must be amended and undergo new testing. The UL 9540A test data together with typical standard BESS battery OEM internal test data provides specific BESS system gas composition and particle production data relevant to the need to apply for an HSC. Controlled quantity and explosive article claims made in the WR would be fully addressed. Regarding BESS container explosion concerns such as McMicken or Carnegie Road, these are addressed in the Applicant's response to Summary point 1 (see above).
		5	Environmental hazards from contaminated fire water	The revised outline Battery Fire Safety Management Plan [**REP2-032**] also specifies capacity and indicative location of bunded lagoons to capture firefighting water run-off. BESS areas and drainage channels will integrate impermeable materials to ensure runoff water will not escape to ground. Bunded lagoon design allows for easy analysis of water content and safe extraction by tankers if environmental pollution safety levels are exceeded. It should be noted that the indicative design lagoon capacity is the maximum volume of the firefighting water tanks plus 40%. When the BESS system is selected at the detailed design stage together with the internal fire suppression system this water run

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				off would drain to a separate water capture tank which will be appropriately sized for a full system discharge.
		9-11	HSC consultation with HSE and EA and requirement for an HSC application	NPS EN-1 sections 4.12 and 4.13 set out the requirements for Safety and Hazardous Substances respectively. Section 4.12.4 states: "*Applicants seeking to develop infrastructure subject to the COMAH regulations should make early contact with the Competent Authority. If a safety report is required it is important to discuss with the Competent Authority the type of information that should be provided at the design and development stage, and what form this should take.* *This will enable the Competent Authority to review as much information as possible before construction begins, in order to assess whether the inherent features of the design are sufficient to prevent, control and mitigate major accidents. The Secretary of State should be satisfied that an assessment has been done where required and that the Competent Authority has assessed that it meets the safety objectives described above*." Section 4.12.4 does not define exactly when such contact with the Competent Authority should occur, but it is clear that the HSE should be consulted with when it is understood that the development will be subject to The Control of Major Accident Hazards Regulations 2015 (COMAH) Regulations. Section 4.13.1 states "*All establishments wishing to hold stocks of certain hazardous substances above a threshold need Hazardous Substances consent. Applicants must consult the Hazardous Substances Authority and the HSE at pre-application stage if the project is likely to need hazardous substances consent. Where hazardous substances consent is applied for, the Secretary of State will consider whether to make an order directing that hazardous substances consent shall be deemed to be granted alongside making an order granting development consent. The Secretary of State should consult HSE about this.*"

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				Whilst Section 4.13.1 does state that "*Applicants must consult the Hazardous Substances Authority and the HSE at pre-application stage*" this is only where it is known that the project will be likely to need Hazardous Substances Consent (HSC). Under the European Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures (CLP), and the associated enabling legislation in the UK, batteries are classified as articles, rather than substances, and are therefore outside of the scope of the COMAH and Hazardous Substances Consent. On 12th July 2021 the Secretary of State for Work And pensions published the following response to a question on whether the exclusion of lithium-ion batteries for grid storage from the Control of Major Accident Hazards Regulations 2015 should be reviewed: *"The Control of Major Accident Hazards Regulations 2015 (COMAH) apply to dangerous substances as classified by the Classification, Labelling and Packaging Regulations 2008. Lithium-ion batteries are considered to be articles, rather than substances, and are therefore outside of the scope of the COMAH.* *The Health and Safety Executive considers that the current regulatory framework is sufficient and suitably robust in relation to lithium-ion batteries and battery energy storage systems.* *Of particular relevance are the Dangerous Substances and Explosive Atmospheres Regulations which set minimum requirements for the protection of workers and others from fire and explosion risks; the Electricity at Work Regulations which require precautions to be taken against the risk of death or personal injury from electricity in work activities; and the Management of Health and Safety at Work Regulations which require risks to be assessed and appropriately managed. In addition, for large scale battery storage, there are statutory*

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				requirements to notify the Fire and Rescue Service to inform their emergency response planning." This therefore confirms the current position in England and Wales that COMAH and HSC do not apply to batteries as they are not defined as hazardous substances under CLP. COMAH and HSC both require that the foreseeable potential for dangerous substances to be generated by the site activities (including in the event of incidents) should be considered when assessing whether a facility should be regulated as a COMAH establishment or requires HSC. However, the identification of foreseeable events and assessment of the nature of and quantity of hazardous substances generated can only be robustly undertaken once the following information is all available: • Fully developed plant design and layout; • Details on the size of each battery storage unit; • Defined battery technology; • Detailed understanding of the chemical composition of the battery units; • Detailed understanding of the mechanisms by which hazardous substances could be generated; • Detailed understanding of potential event scenarios that could lead to the potential generation of hazardous substances; • Understanding of separation distances between battery storage units and the potential for event propagation between units; This data can then be used as part of a robust risk assessment to provide an understanding of potential hazardous substances that could be generated under foreseeable conditions and the

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				maximum quantities that could be produced under the worst-case foreseeable event scenarios. The Scheme is still progressing through the design process, and as yet full detailed design has not yet been completed. As part of this design process, the specific battery technology for the project has not yet been selected, and hence the battery chemistry is not yet defined. Hence it is not yet possible to undertake a robust review of the potential for generation of hazardous substances which can then be used to assess whether COMAH or HSC apply, as stated within the Written Summary of Sunnica Limited's Oral Submissions at the Development Consent Order Issue Specific Hearing on 1 November 2022 [**REP2-036**]. It is therefore proposed that the COMAH and HSC requirements will be reviewed in full at the appropriate point in the project design process. The COMAH Competent Authority (CA) will be consulted with regard to the adequacy of the risk assessments undertaken and asked to confirm the applicability of COMAH and HSC at the site.

2.4 REP2-131 East Cambridgeshire District Council

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
REP2-131	Need	P2 Para 4	East Cambridgeshire District Council would also like to draw to the attention of the Examining Authority that the draft EN-3 suggests a Solar Farm of this scale should be typically limited to a lifetime of 25 years while the developer is seeking a 40 year consent without exceptional justification	The Applicant does not agree that EN-3 provides an assumption that the lifetime of a solar farm should be limited to 25 years. At paragraph 2.49.9 it, states that *"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. Applicants may apply for consent for a specified period, based on the design life of the panels. Such consent, where granted, is described as temporary because there is a finite period for which it exists, after which the project would cease to have consent and therefore must seek to extend the period of consent or be decommissioned and removed."* Paragraph 2.49.12 continues: *"Where the consent for a solar farm is to be time-limited, the DCO should impose a requirement setting that time-limit from the date the solar farm starts to generate electricity. Such a requirement should also secure the decommissioning of the generating station after the expiration of its permitted operation to ensure that inoperative plant is removed after its operational life. A limit of 25 years is typical, although applicants may seek consent for differing time-periods for operation."* Both paragraphs acknowledge that the operational life of a solar farm can exceed 25 years. It is also noted that the NPS EN-3 is in draft and the drafting could be changed in the final version which comes into effect.
REP2-131	Need	P2 penultimate para	It is requested that the Examining Authority also considers the appropriateness of using Draft Overarching National Policy Statement for Energy	The Applicant is of the opinion that the Draft Overarching National Policy Statement for Energy EN-1 (2021) is an important and relevant matter for the Secretary of State in his

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				decision making process. The weight to be attributed to the draft NPSs is set out in more detail in the Planning Statement at paragraphs 5.3.4 – 5.3.7 [**APP-262**]
REP2-131	Planning		The renewable energy benefit of the Scheme would not outweigh harm to "the long term landscape" by virtue of the size, duration and quality of the Scheme. ECDC considers that the proposal does not meet the requirements of section 4.5 and paragraph 5.9.8 of NPS EN-1 and does not comply with section 2.51 of draft NPS EN-3.	The Applicant respectfully disagrees and considers that in reaching this conclusion ECDC has: a. failed to sufficiently accord substantial positive weight to the Scheme due to the contribution it will make towards decarbonisation of the UK's energy production, as the set out in the SoS's decision letter for Little Crow Solar Park; b. afforded too much weight to the landscape and visual impacts of the Scheme, which are localised, time limited and do not affect any designated landscape; and c. failed to acknowledge the statement within NPS EN-1 paragraph 5.9.8 that "virtually all nationally significant energy infrastructure projects will have effects on the landscape". The Applicant also respectfully disagrees that the Scheme is "poor quality" or that it is not compliant with sections 4.5 NPS EN-1 which concerns 'criteria for "good design" for energy infrastructure'. The Design and Access Statement [**APP-264**], Section 6.3 of the Planning Statement [**APP-261**], and the Applicant's answer to Q1.0.3 in the Applicant's Response to the First Written Questions [**REP2-037**] set out how the Applicant has applied 'good design' in developing the Scheme.
REP2-131	Planning		"Draft EN-3 suggests a Solar Farm of this scale should be typically limited to a lifetime of 25 years while the developer is seeking a 40 year consent without exceptional justification. If the Secretary of State was to approve the application it is requested it	The Applicant respectfully disagrees. Draft NPS EN-3 does not say that a solar farm should be limited (or "typically limited") to a 25 year lifespan. Nor is there any reference in draft NPS EN-3 to the need for "exceptional justification" (or any form of justification) for a consent longer than 25 years.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
			is limited to a 25 year lifetime in accordance with emerging national policy"	Paragraph 2.49.9 of draft NPS EN-3 says that solar panels can have a design life of 25 to 30 years or longer, and that developers may seek consent for a specified period based on the design life of the panels should they so wish. 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. The Applicant is therefore voluntarily seeking to limit the duration of the consent to 40 years of solar farm operation, as paragraph 2.49.9 sets out that applicants may wish to do. As set out by paragraph 6.3.23 of ES Chapter 6, Climate Change of the Environmental Statement [**APP-038**], PV panel degradation over time (from 0-40 years) has been factored into calculations for the performance of the Solar PV modules in assessing the climate change impact of the Scheme.
REP2-131	Planning		"East Cambridgeshire District Council requests that the Examining Authority provides dedicated time in order to hear and consider those who work within the Newmarket Horse Racing Industry."	A Horseracing Industry Impact Assessment [**REP2-040**] has been submitted by the Applicant. This concludes that there are no compelling reasons to show that the horseracing industry will be impacted detrimentally in its operations or longer term viability.
REP2-131	Planning		"It is requested that the Examining Authority also considers the appropriateness of using Draft Overarching National Policy Statement for Energy. Specific reference here is not made as the draft EN-3, seems to be of direct relevance to what is primarily a solar farm development."	The Applicant's Planning Statement [**APP-261** to **APP-263**] considers how the Scheme accords with NPS EN-1, NPS EN-3, draft NPS EN-1 and draft NPS EN-3. Given the over-arching nature and application of EN-1 (both the current version and the draft revision), the Applicant considers it has relevance in addition to draft NPS EN-3.
REP2-131	Environment – Built Heritage		The proposal would lead to substantial harm to the setting of the Grade II Historic Park and Garden of Chippenham Hall, specifically the avenue that connects Chippenham Hall to Newmarket. This harm is not outweighed by the provision of renewable	The impact on the Chippenham Hall RPG has been assessed within Chapter 7 – Cultural Heritage of the ES [**APP-039**] and harm identified in Appendix D of the Planning Statement [**APP-263**].

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
			energy. In addition, the proposed additional landscaping will cause further harm to the historic avenue as it will erode what makes the avenue significant	Harm has been identified in relation to the RPG, but this is assessed as being less than substantial. Historic England are in accordance with this conclusion. It is acknowledged that the greatest level of harm is caused to the Avenue which forms part of the RPG. The Applicant has taken into consideration the particular significance of the Avenue and its historic function within the landscape mitigation strategy which includes both setbacks and vegetation enhancement (paragraph 7.6.4 of the ES [**APP-039**]). This balances the need to screen the Scheme with the historic ability to view the parkland from the Avenue.
REP2-131	Environment – Ecology		It is considered that the developer has failed to provide adequate reports or understanding of the potential impact on biodiversity within the local area/development site. Specifically it is recommended the parcels W01-W02 should be removed from the development as this would lead to the long term detrimental harm to biodiversity within the district to Chippenham Fen (Ramsar and SSSI) and Snailwell Meadows (SSSI). On this basis the proposal is considered not to be able to comply with both national and local policy, specifically paras 5.3.11 and 5.3.18 of EN-1.	**Para 5.3.11 of EN-1: Sites of Special Scientific Interest (SSSIs):** All designated sites within the Order limits will be retained as part of the Scheme design and will remain undeveloped. Sites of national importance: Chippenham Fen and Snailwell Poor's Fen SSSI, Snailwell Meadows SSSI, Brackland Rough SSSI, Red Lodge Heath SSSI, Cherry Hill and The Gallops, Barton Mills SSSI, Newmarket Heath SSSI, Devil's Dyke SSSI, Breckland Forest SSSI, Wicken Fen SSSI, NNR (just outside 2km study area) and Rex Graham Reserve SSSI have been considered relevant to the Scheme as important ecological features. The statutory and non-statutory designated sites that have been considered are included in Table 8-9 within [**APP-040**]. Where there is the potential for significant effects, this is stated and the relevant receptors assessed in Section 8.10 of the Chapter 8 [**APP-040**]. The conclusion of the ES was that no significant impacts were predicted to those sites as a result of the Scheme. In any event, as noted in the Heritage and Substation Connection Update note also submitted at Deadline 3A, the

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				Applicant is now proposing to remove fields W01-W02 due to heritage considerations. **Para 5.3.18 of the EN-1: Mitigation** Notwithstanding the position on the SSSI, it is the case that the Applicant has set out mitigation measures for construction at Sunnica are set out in Appendix 16C CEMP [**REP3-015**] and at operational phase through the habitat creation proposals set out in the LEMP [**REP3-011**]. The enhanced biodiversity and habitats include: • Biodiversity and habitat protection, management and impact avoidance requirements including updated surveys, protected species licences, clerk of works, tree works, precautionary working methods and animal welfare requirements; • Measures proposed to enhance existing scrub, reedbed, grassland and hibernacula and habitat piles and tree planting; and • An implementation timetable for maintenance and management, including measures to protect, manage and enhance habitats.
REP2-131	Environment – Landscape and Visual		Given the size of the Scheme, the period of time it will be in situ, its overall poor quality, the detrimental harm to the long term landscape would not be outweighed by the benefit of renewable energy. The following sections of the development should be removed from the development as a landscaping scheme would not mitigate against the long term harm: E05, W03 – W12.	The Scheme has been designed to avoid and minimise effects on the landscape and people's views and visual amenity, as described in the Design and Access Statement (DAS) [**APP-264**] and the Outline Landscape and Ecology Management Plan (OLEMP) [**APP-108**]. The design principles and illustrative materials in the Application demonstrate good design in terms of siting relative to existing landscape character, landform and vegetation. The substantial areas of woodland planting (52ha) and hedgerow planting and enhancement (7.4km) proposed will reinforce the existing landscape framework, further increasing the capacity of the

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				landscape to accommodate the change. This planting will also be effective in further limiting the visual impacts of the built elements of the Scheme such that most effects will not be significant by year 15 of operation. The changes proposed are not irrevocable and these enhancements to the green infrastructure and biodiversity of the landscape will be left when the Scheme is decommissioned and the residual adverse impacts are reversed. 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 small geographic part of the wider landscape defined in published studies, balanced with the further establishment of the extensive enhancements to 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 substantially strengthen this landscape framework with extensive grassland swards extending beneath panels and across ecological mitigation areas, delivering biodiversity net gain and amenity. The Applicant acknowledges that some significant effects on the landscape will remain at year 15 of operation, but has demonstrated that the development proposed within parcels E05 and W03 to W12 can be integrated into the landscape within this framework.
REP2-131	Environment – Landscape and Visual		The proposal does not provide sufficient information about the impact of the scheme on trees and the surrounding landscape.	The Landscape and Visual Impact Assessment summarised in Chapter 10 of the ES [**APP-042**] provides a full assessment of impacts on the surrounding landscape.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				Building on the Trees Constraints Report [**APP-101**] submitted with the information, additional information on trees was submitted at Deadline 3 in the Arboricultural Impact Assessment Report [**REP3-021**], which concludes that only minor impacts arise.
REP2-131	Environment – Socio-economics		The proposed impacts on the wider economy of the local area have not been assessed correctly and therefore the methodology and assessment of the workforce and its origins is deemed insufficient.	The broad approach to the workforce and its origins assessment as presented in Chapter 12 of the ES [**APP-044**], is aligned with typical EIA methodology including consideration of leakage and multiplier effects, as set out in the Homes and Communities Agency Additionality Guidance (3rd Edition). The home-based workers assessment presented in Chapter 12 of the ES [**APP-044**], presented as a Leakage factor within the assessment of construction employment generation, was carried out using Census 2011 Origin and Destination data representing the number of people that travel into the 45-minute travel area for work, amounting to 88% workers being home-based. The Applicant therefore considers its methodology of assessment to be an appropriate level of detail on which to base an assessment of significant effects in EIA. The Applicant acknowledges that a more detailed assessment of home-based workers is possible, including: the current locally available construction workforce; and workforce availability when taking into account planned and future projects, including other solar projects. To further this, the Applicant has confirmed the roles required by number of workers and whether these are skilled, semi-skilled and unskilled. The Applicant considers that the semi-skilled and unskilled roles have the potential to be met by the local labour force further to a consideration of labour force availability. It is currently engaging with the Council regarding this.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
REP2-131	Environment – BESS – Fire Safety		The Council while not having expertise in battery management or safety would want to see appropriate mitigation measures (secured by the DCO requirements) that ensure that a battery fire does not pose an unnecessary risk to either the public or firefighters; in addition ensuring the environment is protected for instance against water pollution. Given as battery technology is changing at a fast rate this might involve, but not limited to requiring the developer at its expense training the fire services on how to deal with a potential fire. However, the Council will support the comments of the Fire Services and other independents who have expertise in this field.	In recognition of the concerns raised by interested parties the Applicant has updated the outline Battery Fire Safety Management Plan [**REP2-032**] and submitted it for Deadline 2. It is considered this provides a detailed plan which ensures that the final design of the BESS will be acceptable and that in the unlikely event of a fire it would be managed safely ensuring the safety of site staff, first responders and the wider community. The revised outline Battery Fire Safety Management Plan also specifies capacity and indicative location of bunded lagoons to capture water run-off. BESS areas and drainage channels will integrate impermeable materials to ensure runoff water will not escape. Bunded lagoon design allows for easy analysis of water content and safe extraction by tankers if environmental pollution safety levels are exceeded.

2.5 REP2-143 Historic England

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
REP2-143	Environment - Heritage	1.10	Concerns over methodology used, particularly the use of matrices to assess impacts	The Applicant acknowledges Historic England's concerns over the use of matrices in assessing impacts to the historic environment, particularly in relation to the ascribing of harm as outlined in the NPPF. For this reason, a separate Heritage Harm Statement has been undertaken and is included in Appendix D of the Planning Statement [**APP-263**].
REP2-143		2.4-2.13	Identifies harm to Chippenham Park and Gardens RPG which it is not possible to fully mitigate. Additional concern that the temporary nature of the development, which is disagreed with, has been used to justify the effect on Chippenham Park and Garden RPG. Effect should be higher based on timescale of development.	The Applicant agree that Chippenham Park and Gardens RPG will experience a significant effect as presented in Chapter 7: Cultural Heritage of the Environmental Statement [**APP-039**]. 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**]). The temporary nature of the impact is not taken into consideration within the assessment. It is stated to be temporary; however, this has not been used to mitigate the impact.
REP2-143	Planning	2.9-2.12, 2.23-2.26 and 2.37	Although the Scheme would be decommissioned after 40 years of operation it would *"…create a precedent for potential extended operation or intensification"* and that there would therefore be *"permanent changes to the landscape"* which would result in permanent loss of significance through changes to the setting of heritage assets.	The Applicant respectfully disagrees. No precedent for continued or new development following decommissioning will be created by the Scheme which will be subject to a DCO requirement to end its operational life. Once this has ended the Scheme lands will return to agricultural land (except for where habitat and landscaping has been created). Decommissioning of the authorised development will be undertaken pursuant to the approved Decommissioning Environmental Management Plan (DEMP) that must be approved prior to decommissioning under requirement 22 of the draft DCO. The DEMP must be substantially in accordance with the Framework Decommissioning Environmental Management Plan that has been submitted with the DCO Application in Appendix 16E of the Environmental Statement [**APP-125**]. The DEMP will enable the land, once decommissioned, to be

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				returned to the landowner to be used for agriculture (subject to areas of ecological or landscape mitigation). Any future proposed change of use or development of the Order limits land following decommissioning would require planning or development consent. The baseline for consideration of an application for such a consent would be the post-decommissioning status of the land, which would be greenfield land. The Applicant therefore considers that [**REP2-143**] is incorrect to state that there would be a permanent change to the landscape that would result in the loss of significance if heritage assets through permanent changes to their setting. Notwithstanding the above, the Applicant notes that Historic England agrees that the impact of the Scheme on the setting of Chippenham RPG and on the four bowl barrows north of the A11/A14 junction, part of Chippenham barrow cemetery would amount to less than substantial harm.
REP2-143		2.13 & 5.4	Consideration should be made to provide additional planting to Sunnica West A to further reduce harm on Chippenham Park RPG	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. It is therefore considered that the correct balance has been made between planting for screening and enabling continued appreciation of the parkland.
REP2-143	Environment - Archaeology	2.27 & 4.2, 4.16	Chippenham Barrows are not mentioned in the Landscape and Environmental Mitigation Plan	A Heritage Environmental Management Plan (HEMP) will be prepared for inclusion in the LEMP. The HEMP will detail how the barrows and other archaeological preservation areas within the Scheme will be conserved and managed by the Applicant. Certain mitigation requirements relating to the HEMP are

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				expected to be included in the joint LPA's brief for Detailed Archaeological Mitigation Strategy (DAMS). The Applicants corresponding DAMS and HEMP will contain a number of cross over points and together form the overarching mitigation strategy. The HEMP has not yet been included in the LEMP as it is to be in accordance with the brief currently being prepared by the Joint LPA's. Once included it will include consideration of the future management of the barrows. Final details will be submitted post-planning.
REP2-143		2.18-2.27	Chippenham Barrows Impact upon setting	The Applicant agrees that the setting of the barrows will be harmed by the Scheme due to changes to their setting. A moderate adverse impact upon the setting of Chippenham Barrow Cemetery has been identified in the E.S. Chapter 7 – Cultural Heritage [**APP-039**]. Harm has been identified within the Heritage Harm Statement (Planning Statement Appendix D [**APP-263**]). This has been assessed as being less than substantial, acknowledging that the Scheme will result in further changes to their setting. This conclusion is assessed regardless of the timeframe of the development. This acknowledges that there will be changes to the existing rural landscape; however, it is considered that the existing landscape is much changed from the original context of the barrows due to the influence of changing agricultural practices. The harm caused is considered to be associated with the change from agriculture to infrastructure, while maintaining existing boundaries and openness The Overarching National Policy Statement for Energy (NPS EN-1) paragraph 5.8.18 states that: "*When considering applications for development affecting the setting of a designated heritage asset, the IPC should treat favourably applications that preserve those elements of the setting that make a positive contribution to, or better reveal the significance of, the asset. When considering applications that do not do this, the IPC should weigh any negative effects against*

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				the wider benefits of the application. The greater the negative impact on the significance of the designated heritage asset, the greater the benefits that will be needed to justify approval". The Applicants forthcoming Detailed Archaeological Mitigation Strategy will include a series of dedicated research aims relating to the barrow cemetery and wider landscape. These, together with the results of the mitigation within the development, will provide a focus for research that will result in a better understand of the barrows in the landscape and their contemporary settlements. The results of this research will also provide an opportunity for permanent public interpretation. Although there would be harm to the significance of the setting of the barrow cemetery, this would be temporary and as little is currently known about the barrows and wider archaeological landscape, it is the Applicants opinion that the local conservation of the barrow cemetery (See NPS EN-1 5.8.14) and the permanent knowledge gain represents a great benefit to this and future generations and that this should be considered in accordance with national policy tests. A HEMP will be prepared for inclusion in the LEMP to further refine the mitigation for the barrows within the Site.
REP2-143		2.29	Roman Villa S of Snailwell Fen	Please see the separately submitted Heritage and Substation Connection Update.
REP2-143		3.1-3.4, 4.8-4.15, 4.18, 5.8	Detailed Archaeological Mitigation Strategy	The Detailed Archaeological Mitigation Strategy (DAMS) and Site-Specific Written Schemes of Investigation (SSWSI) will be prepared in accordance with a Joint LPA brief(s). These documents will fully and clearly establish the proposed mitigation for each impact zone. Details on further (Phase 2) evaluation will also be provided in the DAMS. Contingencies for mitigation of unforeseen remains of significance through design and/or excavation will also be detailed.
REP2-143		3.7- 3.9, 3.11, 3.12,	Fenland Areas	The DAMS and SSWSI's will clearly and fully detail methodologies for archaeological investigation within the fenland areas.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
		3.15, 3.17, 3.18, 3.20, 3.24		Refer to the Applicant's Response to the First Written Questions [**REP2-037**], Q1.11.2, for commentary on groundwater protection. Please also refer to the Flood Risk Assessment which has been undertaken [**AS-007**].
REP2-143		3.16, 3.27	Trench Evaluation Environmental Sampling	The Applicant is currently liaising with the Archaeological Contractor to ensure that environmental samples are being processed and reporting produced at the earliest opportunity. The Applicant will update the Detailed Archaeological Mitigation Strategy (DAMS) with the resulting information to ensure that mitigation appropriately addresses sampling requirements.
REP2-143		3.19	Archaeological Preservation – guidance references	Noted. These matters will be able to be included in the HEMP.
REP2-143		3.22	Impacts on buried Archaeology	The Applicant has assessed the impact as minor adverse with due regard to the relatively limited pile footprint of the array structures, narrow cable trenches and relatively small footprint of infrastructure buildings. The Applicant considers that overall, this impact should be considered less than the wholesale impact over wide areas that can be experienced on many development projects. The Applicant has assessed that the direct impact is not of equivalent magnitude as development that requires wholesale ground reduction for example, for the construction of buildings or major infrastructure projects. This notwithstanding, all areas of potentially significant undesignated archaeology identified through evaluation will be mitigated through excavation in agreement with the LPA Historic Environment Teams and in accordance with an approved DAMS.
REP2-143		4.0, 4.16, 4.18,5.9,5 .10	LEMP	The final LEMP will include a dedicated HEMP section to detail the way in which the Applicant will manage the designated heritage assets, including the Chippenham Barrows. The HEMP has not yet been included in the LEMP as it is to be in accordance with a brief currently being prepared by the Joint LPA's.
REP2-143		4.19	DCO Schedule 2- inclusion of HE as Statutory Consultee on DAMS, WSI and LEMP	The Applicant would be willing to add Historic England as a consultee for the LEMP and will do so at Deadline 4. Historic

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				England's role in archaeological matters will be set out in the forthcoming DAMS, which will be secured by DCO Requirement. It is noted that a separate consents under the Ancient Monuments and Archaeological Areas Act 1979 is not required, as the need for such a consent is removed by section 33 of the Planning Act 2008. Sufficient protections for the SAM will be developed through the operation of the DAMS and LEMP processes.
REP2-143	Environment - Landscape and Visual		There is no specific reference to the Landscape and Visual Impact Assessment (LVIA) summarised in Chapter 10 of the ES [**APP-042**]. However, Historic England makes reference to the impacts of the Scheme on the character of the landscape and its contribution to the setting of heritage assets and views.	Chippenham Park is identified in the LVIA as Local Landscape Character Area (LLCA) 23b, which is defined by the Applicant and includes the Avenue extending south from the walled enclosure of the parkland to where it meets the A14 trunk road. Its immediate setting to the east, south and west is largely provided by LLCA 24: Lowland Estate Chalkland. The design of the Scheme has evolved to minimise the impacts on the setting of Chippenham Park. As explained in paragraph 3.6.7 of the Design and Access Statement (DAS) [**APP-264**], a design decision was made between statutory consultation and submission of the Application to omit parcels W13, W14 and W16 adjacent to Chippenham Park in response to feedback received from stakeholders, including local planning authorities. This decision was taken to retain the open setting of Chippenham Park. Historic England acknowledge in paragraph 2.4 of [**REP2-143**] that close-to-middle distance views will therefore be retained from local roads to the boundary wall, perimeter belts and exotic planting within the landscape park, which stand out in contrast to the wider agricultural landscape. As noted in paragraph 10.6.309 of the LVIA [**APP-042**], the ZTV shows no visibility of the Scheme across Chippenham or Chippenham Park. This is confirmed by VP30 from Chippenham High Street, illustrated in Figure 10.54A and 10.54B [**APP-227**]. This figure shows that intervening vegetation and buildings screen views of the land within the Order limits from within Chippenham. Similarly, for VP31 in Figure 10.55A [**APP-227**]

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				and VP32 within Chippenham Park shown in Figure 10.98A to 10.98C [**APP-228**], vegetation and the tall boundary wall would screen views of the Scheme. Updated ZTVs were submitted at Deadline 1 [**REP1-008** to **REP1-013**]. The Avenue of Chippenham Park has suffered substantial harm, including it severance by the Newmarket to Ipswich railway line and the A14 trunk road and its use during the second world war as part of RAF Snailwell. Since the war, the section within the Scheme has suffered from neglect and is now substantially overgrown, undermining its function as an avenue. Solar panel arrays are proposed within parcels W04 within land that was formerly part of RAF Snailwell to the west of the Avenue and in W05 to the east. The Scheme offers the opportunity to enhance and reinforce this section through careful management and planting to increase its legibility and resilience to future change.
REP2-143	Environment – General ES	5.1	Table 3-2 Foundation choices selected for the various elements of the scheme can be summarised as either: • Piles – between 3.5 to 12m below ground level • Concrete base that would required a 1m thick layer of sand The final design of these elements has not been finalised, and so the worst-case scenario is being considered. The impact the foundation design would have on any buried archaeology, both in terms of the direct and indirect impacts needs to be considered. The ES needs to demonstrate it has considered these impacts, in particular by stating what mitigation is being proposed in the DAMS and WSI documents.	The type of foundation will be finalised during the detailed design of the Scheme to ensure structural integrity of the infrastructure. The potential impacts on buried archaeology have been assessed in Chapter 7: Cultural Heritage of the ES [**APP-039**] and mitigation measures have been proposed to address these impacts. However, following receipt of the Brief from the County Archaeologists a DAMS will be prepared which will formalise the required mitigation for the Scheme.

2.6 REP2-148 Isleham Parish Council

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
REP2-148	Environment - Archaeology		Military Plane Crash Site	The Applicant recognises the Parish Councils concerns over the sensitivity of the air crash site and has undertaken further research. The location of the crash was not recorded on the Cambridgeshire Historic Environment Record at the time of writing the ES, however a programme of research has since included comparison of aerial photographs taken on the day of the crash and a review of the War Departments official report (IAW EO 13526 Accident Aircraft report 46-060). This has resulted in the positive identification of the precise location of the crash site as an anomaly in Field E05. The Applicant has followed the procedure recommended in the guidance for Military Aircraft Crash Sites (English Heritage 2002) and upon positive identification of the precise crash site, immediately undertook consultation with the Cambridgeshire Historic Environment Team (CHET) and the Joint Casualty and Compassionate Centre (JCCC). As a result, the Applicant is applying for a licence in accordance with Section 4 of the Protection of Military Remains Act 1986. The licence application will be accompanied by report on the recent research into the crash. If granted, the licence schedule is expected to be for works within a standard 100m radius of the crash site. If the licence is not granted, no development will proceed within the 100m extended exclusion zone. Even if the licence is granted, the Applicant is proposing to exclude a 50 m by 50m box around the crash site from development. This will be known as the 'crash site exclusion area' and will include the immediate area over and around the crash site crater which will be excluded from development in all circumstances. The crash site exclusion area will be certified by the DCO. In addition to removal of development from the crash site, the Applicant proposes that an elevated marker post is erected at the location of the excluded area to be viewable from the Beck

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				Road and permissive path to the south west. The Applicant proposes that a commemorative plaque and information on the crash could also be installed at a suitable location by the path and road. This will allow the crash site to be considered from a sufficient distance to provide an understanding of the aircraft's final flight path from Lakenheath and the proximity of the crash site from the village of Isleham.
REP2-148	Environment – Ecology	Section 2.2	Many residents have expressed concerns about the impact on wildlife. The extent of disturbance to wildlife habitats and the removal of the wildlife corridors will displace species. Deer and muntjac, which are common to see will be excluded from large numbers of fields by the proposed anti-deer fencing. Their displacement is likely to lead to more animals in the village and on the roads, which makes them more hazardous. The Lee Brook runs through the middle of the area proposed for Sunnica East A. It is a rare chalk stream (and tributary of the River Lark chalk stream). According to local expert naturalist, there are a number of rare and protected aquatic species that inhabit this Brook, as well as water vole, which could be severely impacted through run-off from the solar panels which would causing silting and soil erosion.	The site of the proposed energy farm is predominantly intensive arable agriculture which has a low biodiversity value, so low that it is of regional and national concern. 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 **[REP3-012]** 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. 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

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				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). Unfortunately, Lee Brook is a very much degraded watercourse as a result of intensive drainage and crop irrigation. As described above, the Brook will improve in biodiversity value. This is in part due to a reduction in sediment being washed into the Brook as well as pesticides and fertilisers, neither of which will be used across the Scheme. 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

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				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 demonstrates the Scheme will not result in operational water contamination – either surface water or groundwater. Measures to avoid and minimise runoff into watercourses during construction and operation are outlined in the Framework Construction Environmental Management Plan **[REP3-015]** and Framework Operational Environmental Management Plan **[REP2-030]**. No eutrophication of Lee Brook is predicted to take place with these mitigation measures in place.
WR-016	Environment – BESS – Fire Safety		Many residents have expressed concerns about the potential visual and noise impacts of the large-scale Lithium ion battery storage compounds and substations. Sunnica have not provided any information on possible layouts etc to allow people to adequately assess this. Residents are also deeply concerned about the current inadequacy of regulation with these Grid scale batteries and the very real risk of fire and explosion that they pose and the limited knowledge of how best to handle such events, as shown in the report into the Liverpool BESS fire and paper by Fordham et al. (Appendix 6 – Fordham et al Safety of Grid Scale Lithium-ion Battery Energy Storage Systems). Sunnica's proposed battery storage systems would be amongst the biggest in the UK, if not Europe. We are understandably concerned about the risk of explosion and fire and lack of resource to deal with such an incident as the BESS site on East A is just	In recognition of the concerns raised by interested parties the Applicant updated the outline Battery Fire Safety Management Plan **[REP2-032]** and submitted it at Deadline 2. It is considered this provides a detailed plan which ensures that the final design of the BESS will be acceptable and that in the unlikely event of a fire it would be managed safely ensuring the safety of site staff, first responders and the wider community. It also includes indicative layouts for the BESS. Dispersion modelling undertaken in Appendix 16D models a worst-case scenario, and shows no risk to health or life outside of the application boundary. As stated in the plan the BESS system selected for Sunnica will have completed UL 9540A testing which defines and quantifies gas emissions produced during thermal runaway. This data, if necessary, will then be used for specific BESS consequence modelling for the Sunnica site. A key priority of this dispersion modelling is to ensure that respondent exposure to any level of

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
			over 1 Km from Isleham residents. Toxic gas emissions from such events resulting from a thermal runaway incident include hydrogen fluoride (HF), which is highly toxic in very small quantities, as well as a number of other toxic gases. In such an event, because of proximity, the village would likely need to be evacuated. IPC notes that some plume dispersion modelling has been carried out by Sunnica but consider this to be insufficient since they have a) not yet established which batteries they will be using, b) not yet decided on the number of batteries and c) only based modelling on HF, but none of the other possible toxic emissions. IPC considers that substantial additional information is required in order for battery safety to truly be assessed and do not feel that preventive safety measures are being 'designed in' to this scheme as they should be.	emissions from a BESS thermal runaway incident are minimised and the ERP provides clear alert protocols and safety guidelines. The Applicant's BESS fire safety team has studied many of the global BESS incident reports to help inform red flags for the Sunnica BESS design template and to establish key safety protocols to inform drafting of Emergency Response Planning (ERP) documentation at the detailed design stage. For example, the Liverpool BESS container design was not equipped to the highest safety specifications offered by NEC, which would seem to be a significant oversight considering the close proximity to local residences. The BESS container did not integrate a gas exhaust system for explosion prevention or integrate deflagration panels for explosion protection and was fitted with a fire suppression system discharging NOVEC 1230, which was widely known to be inappropriate for lithium-ion BESS systems.

2.7 REP2-185 Lucy Frazer MP and Matt Hancock MP

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
REP2-185	Consultation		Throughout the application process, we have been disappointed by the regard shown by Sunnica Ltd for our constituents. Most recently, this manifested itself in the applicant's letter dated 21st July 2022 to the Examination Committee, in which Sunnica Ltd called for the examination to commence even though their proposed changes to the scheme were not due to be clarified until 30th August. Assessments relating to noise, traffic, changes to landscape, safety, security, and decommissioning had not been completed.	It is common that changes are made to an application following the start of an examination. The Applicant considers that there would have been sufficient time for interested parties to consider the proposed changes (and their associated impacts) had the Examination commenced at an earlier date. The Applicant has sought the views of the community across two rounds of consultation. It has published the responses received and the regard that it has had to them in the Consultation Report [**APP-026**] and Consultation Report appendices J-1 to J-5 [**APP-030**]. Feedback received from the community has played an important role in shaping the Scheme's design. Further information on the design evolution of the Scheme is given in Chapter 4: Alternatives and Design Evolution of the Environmental Statement [**APP-036**].
REP2-185	Consultation		During the period 6th June – 6th July, when there was a consultation on their proposed changes, Sunnica Ltd not hold any consultation in Suffolk, despite two of the affected locations residing in the county. The omission of in-person meetings also occurred last Autumn, when Sunnica Ltd refused to attend an open meeting with residents on 15th October and failed to schedule any alternative in-person sessions despite the relaxation of all legal social restrictions in July	Although both exhibition locations during the 6 June to 6 July changes consultation were within Cambridgeshire, the locations were in close proximity to areas affected by the changes and people living within Suffolk were invited to each event. The Applicant does not consider this to have been an impediment to taking part in the consultation. The Applicant has subsequently attended meetings in-person in the area following acceptance of the Application. This has included further consultation on the Applicant's changes to the application. Due to team availability, it has not always been possible to attend every meeting.
REP2-185	Consultation		Our constituents have frequently highlighted to us poor information access, especially for those who struggle with digital technology; low quality webinars; a general unwillingness to provide further details about the scheme; and short notice for deadlines as a result of Sunnica Ltd's changeable agenda.	The Applicant considers that it has provided appropriate access to information through a variety of channels. Further details are provided in chapter 2 and 4 of the Consultation Report [**APP-026**].

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
REP2-185	Environment - Landscape and Visual		The Scheme will cause irrevocable harm to our local landscape.	The Landscape and Visual Impact Assessment (LVIA) summarised in Chapter 10 of the ES [**APP-042**] acknowledges that the construction, operation and decommissioning of the Scheme will result in adverse effects on the local landscape. However, the Applicant does not agree the Scheme will fundamentally alter the East Anglian landscape and the amenity of villages. The National Policy Statement for Energy (NPS EN-1) places great weight on the preservation of nationally designated landscapes, such as Areas of Outstanding Natural Beauty (AONB). Whilst the Applicant agrees that high value is placed locally on parts of the landscape in and around the site, no part of the Scheme is located within or in proximity to a nationally or locally designated landscape. The Scheme has been designed to avoid and minimise effects on the landscape and people's views and visual amenity, as described in the Design and Access Statement (DAS) [**APP-264**] and the Outline Landscape and Ecology Management Plan (OLEMP) [**REP3-011**]. The LVIA concludes that significant residual effects would be localised at the scale of the site, the Rural 2: North and Rural 3: East areas defined within the Freckenham Neighbourhood Plan and two of the 44 Local Landscape Character Areas (LLCA) defined by the Applicant. However, due to the relatively small geographic part of the wider published studies, balanced with the further establishment of the GI, the effects to the published landscape character areas are assessed as ranging between negligible adverse and minor adverse on a combined basis and these effects are considered not significant. The design principles and illustrative materials in the Application demonstrate good design in terms of siting relative to existing landscape character, landform and vegetation. The substantial areas of woodland planting (52ha) and hedgerow planting and

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				enhancement (7.4km) proposed will reinforce the existing landscape framework, further increasing the capacity of the landscape to accommodate the change. This planting will also be effective in further limiting the visual impacts of the built elements of the Scheme such that most effects will not be significant by year 15 of operation. The changes proposed are not irrevocable and these enhancements to the green infrastructure and biodiversity of the landscape will be left when the Scheme is decommissioned.
REP2-185	Environment - Transport		Impact of construction traffic Durability of local highway	The construction of the scheme will result in additional traffic on the local highway network during the construction period. The impact on the local highway network will therefore be a short term and temporary impact. The Transport Assessment [**APP-117**] and the Transport and Access chapter of the ES [**APP-045**] assess the peak of the construction phase. The peak number of daily staff vehicles is forecast in month nine with 937 staff vehicles, whereas the average over the construction period is 653 vehicles. Therefore, the assessment of the construction staff traffic in the Transport Assessment [**APP-117**] and the Transport and Access chapter of the ES [**APP-045**] is robust. As part of the embedded mitigation for the scheme, the construction staff will travel to / from the site outside of the highway network peak hours in order to avoid peak time capacity impacts, representing an efficient use of the highways network. The working hours are secured under the draft DCO, with reference to the requirement relating to the Framework Construction Environmental Management Plan [**REP3-015**]. Table 13-33 in the Transport and Access chapter of the ES [**APP-045**] details that peak construction period traffic will not result in significant effects for vehicle travellers in terms of driver delay, accidents and safety. In addition, the peak construction traffic will not result in significant effects on Non-Motorised Users (NMUs) in terms of severance, pedestrian delay,

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				pedestrian/cycle amenity, fear and intimidation and accidents and safety. The Applicant has committed to conditional surveys to ensure damage caused by the vehicles related to the development is made good. This is committed to within Section 7 of the Framework Construction Traffic Management Plan and Travel Plan [**REP3-014**]. The extent of the conditional surveys is to be agreed with the local highway networks, although it is intended that the conditional surveys would include the local highway network from the A11 to the site accesses, as specifically referenced in this Written Representation. This is secured under the draft DCO - Requirement 16 in Schedule 2 to the draft DCO requires the relevant authority's approval of the CTMP before the commencement of the development, and the CTMP must be substantially in accordance with the Framework.
REP2-185	Environment – Waste		We would welcome more information about the economic and environmental effects of the decommissioning phase. At present, we believe Sunnica Ltd have only accounted for these effects during the construction and operations phase.	As outlined in Section 3.9 of Chapter 3: Scheme Description [**REP2-022**] the Scheme will be required to be decommissioned after 40 years of operation. For the purposes of the ES, decommissioning is assumed to begin no earlier than 2065, although some parts of the Scheme may be decommissioned earlier if the landowner requires it. Decommissioning is expected to take between 12 and 24 months and will be undertaken in phases. Each of the technical chapters within the ES [**APP-038**] to [**APP-047**] has considered the potential effects of the Scheme during decommissioning, including economic and environmental effects, where relevant, and proposed mitigation measures to address these affects where required. A Framework Decommissioning Environmental Management Plan (DEMP) has been prepared (Appendix 16E of this Environmental Statement [**REP2-028**]) and submitted with the Application. The DEMP, which is secured through Requirement 22 of the Draft DCO [**REP2-012**], outlines how the mitigation measures included within the ES will be

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				implemented to manage or reduce effects arising from decommissioning. It also sets out the monitoring and auditing activities designed to ensure that such mitigation measures are carried out, and that they are effective.
REP2-185	Environment – BESS – Fire Safety		According to Sunnica Ltd, 78 acres over three site compounds will be populated with lithium-ion battery energy storage systems (BESS)[8]. The planned total energy stored in these cells will amount to between 1.4-2.7 kilotons of TNT, which is the equivalent of 92-270% of the energy released in the Beirut warehouse explosion in August 2020[9]. We appreciate our constituents' concern that a project with such major accident potential is being considered so near to residences. According to Sunnica Ltd, some residences would lie just 0.27km from the development [10]. We urge the Examining Authority to seriously consider these safety risks during the examination period.	In recognition of the concerns raised by interested parties the Applicant has updated the outline Battery Fire Safety Management Plan [**REP2-032**] and submitted it for Deadline 2. It is considered this provides a detailed plan which ensures that the final design of the BESS will be acceptable and that in the unlikely event of a fire it would be managed safely ensuring the safety of site staff, first responders and the wider community. Dispersion modelling undertaken in Appendix 16D models a worst-case scenario, and shows no risk to health or life outside of the application boundary. As stated in the Plan the BESS system selected for Sunnica will have completed UL 9540A testing which defines and quantifies gas emissions produced during thermal runaway. This data will then be used for specific BESS consequence modelling, if necessary, for the Sunnica site. A key priority of this dispersion modelling is to ensure that respondent exposure to any level of emissions from a BESS thermal runaway incident are minimised and the ERP provides clear alert protocols and safety guidelines. With regard to the Beirut TNT risk comparison, this is an erroneous analogy which bears no relation to a worst-case scenario incident for BESS equipment on the Sunnica site. The Beirut incident explosion materials were all housed within a warehouse structure. Sunnica battery systems will be housed across separate sites within multiple BESS containers, there is no credible scenario that would lead to the instantaneous or full destruction of all BESS containers. There is no credible worst-case scenario that could lead to the instantaneous thermal

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				runaway initiation for all battery cells within a single BESS enclosure. Worst case scenario BESS incidents have resulted in explosions categorised as deflagrations, these are sub-sonic explosions which grow uniformly in enclosures and can be mitigated by gas exhaust or venting systems. The safest BESS enclosure designs integrate gas exhaust or venting systems as standard. In a small number of incidents where exhaust or ventilation systems were not integrated BESS enclosures, debris was ejected up to a 25-metre distance from the enclosure. There are no residences within these distances of the proposed BESS. The Beirut incident and the TNT comparison involve explosions defined as detonations. Detonations propagate at 2-3 orders of magnitude faster than deflagrations, involving supersonic velocities leaving no time to relieve pressure. Detonation pressure fronts are 15-20 times higher than the initial explosion pressure which led to significant building damage in Beirut up to 6 miles from the warehouse location. This resulted in a 124-metre diameter blast crater, 43 metres in depth. This is not a remotely credible comparison to the Sunnica BESS site incident risk.
REP2-185	Environment – Soils (agriculture)		Patrick Stephenson Report, and observed productivity of the land.	The Patrick Stephenson ALC assessment does not comply with the MAFF ALC Guidelines (October 1988). They did not assess land within the site and for drought limited land have not carried out a drought calculation as per the ALC guidelines. In section 2 of the ALC guidelines, descriptions of the ALC grades are given along with typical cropping. However, before this the guidelines direct that in practice the grades are defined by reference to physical characteristics, grading guidance and cut off limitations. Natural England document TIN049 also notes

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				that current agricultural use or intensity of use does not affect ALC Grade. As stated in The Applicant's Responses to Relevant Representations [**REP1-016**], 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 Best and Most Versatile Land (BMVL). The ALC assessment (to determine the grades of the soil, and therefore the amount of BMVL within the Order limits) 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.

2.8 REP2-195 Mildenhall High Town Council

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
REP2-195	Need	P1 last para	Mildenhall High Town Council expresses its doubts over the "green carbon neutral claims of the developers".	Section 3.1 of the Statement of Need [**APP-260**] describes that the deployment of renewable generation, and the closure of carbon intensive generation, since 2011 has been the key driver of carbon emissions reductions in GB electricity generation to date. Low carbon plant decarbonise the grid. Chapter 5 of the Statement of Need describes that electricity demand is anticipated to grow in Future Energy Scenarios which meet Net Zero, through the substitution of carbon intensive modes of transport, home heating and commercial applications, to clean electricity. Chapter 6 of the Statement of Need describes that massive capacities of solar generation and other forms of low-carbon generation which National Grid and others forecast is needed in order to fulfil this growing demand. Figure 6-2 of the Statement of Need shows that if the electricity anticipated to be generated by solar panels over the period to 2050 is generated from CCGT rather than solar, then CO2 emissions would continue to grow. The conclusion is clear: without solar, decarbonisation is not possible. Low carbon schemes such as Sunnica decarbonise the grid and are an essential weapon in the achievement of Net Zero by 2050. The Applicant has also responded to comments on the life cycle GHG assessment in the thematic response on climate at this Deadline 3a and contained in this document.
REP2-195	Environment - Landscape and Visual		The proposed scale of this development will fundamentally and permanently change the natural landscape and the ability for local people and tourists to enjoy the amenity this provides. Essentially the area would become industrialised and people will be unable to enjoy the natural and built environment, including historic views, and the land itself may be damaged for generations.	The Landscape and Visual Impact Assessment (LVIA) summarised in Chapter 10 of the Environmental Statement (ES) [**APP-042**] and supported by associated appendices and figures provides a detailed and robust assessment of the likely significant effects on the landscape and people's views of the landscape. The LVIA acknowledges that the construction, operation and decommissioning of the Scheme will result in adverse effects on the local landscape. However, this will not

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				fundamentally change the ability for people to enjoy the amenity that the landscape provides. In this context, and with the Scheme's extensive landscaping and habitat creation proposals set out in the OLEMP [**REP3-011**] in place, the Applicant considers that there would be no 'industrialising' effect as a result of the Scheme. The landscape within the DCO site and the study area for the LVIA is the product of centuries of human intervention. Whilst it includes some semi-natural features and characteristics, it cannot be described as a natural landscape. It is principally a landscape of intensive agricultural production, with other modern rural land uses. Landscape character is not static and evidence of change is visible throughout the landscape. For example within and around Sunnica East Site B where extensive pig farming and quarrying previously extended across the landscape.
REP2-195	Environment - Socio-economics		Mildenhall High Town Council provides a population demographic profile for Mildenhall.	The Applicant acknowledges the comment made relating to the local population profile.
REP2-195	Environment - Transport		General comment regarding impact of HGVs	The number of HGVs required throughout the construction period has been provided in Table 6-3 of the Transport Assessment [**APP-117**]. The HGV numbers for the construction period have been provided by an appropriately experienced contractor, and is based on all activities required to deliver the project. Table 13-33 in the Transport and Access chapter of the ES [**APP-045**] details that peak construction period traffic will not result in significant effects for vehicle travellers in terms of driver delay, accidents and safety. In addition, the peak construction traffic will not result in significant effects on Non-Motorised Users (NMUs) in terms of severance, pedestrian delay, pedestrian/cycle amenity, fear and intimidation and accidents and safety.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				Chapter 7 of the Framework Construction Traffic Management Plan and Travel Plan [**REP3-013**] (which was updated at Deadline 3) sets out significant embedded mitigation, including measures to control the arrival and departure of HGVs for the site. The timing restrictions are: a. No arrivals or departures on a Weekday between 08:00 and 09:00, and between 17:00 and 18:00; b. No arrivals or departures on a Saturday before 08:00 or after 13:00; and c. No arrivals or departures on Sundays or public holidays. No HGV deliveries will be programmed outside of staff working hours, i.e. before 0700 hours or after 1900 hours on a weekday, in addition to the restrictions above. There will be no HGV movements in the peak construction staff traffic hours of 0600-0700 hours and 1900-2000 hours. A Delivery Management System will be implemented to control bookings of HGV deliveries from the start of the construction period. This will be used to effectively plan all HGV deliveries in accordance with the construction programme, regulate the flow of HGVs via timed delivery slots and monitor compliance of HGV routeing. The ES assesses a worst-case scenario in terms of maximum HGV numbers per hour. A Traffic Management and Monitoring System (TMMS) will be developed. The TMMS will provide details of the technologies and other means employed to monitor HGVs to/from the development site (e.g. Global Positioning System (GPS), Automatic Number Plate Recognition (ANPR)). This will enable the Applicant to monitor the following: a. Compliance with the HGV routes;

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				b. Compliance with the number of HGV limits in terms of number of deliveries arriving and departing at any one time and over the course of the day; and c. Compliance with the timing restrictions.
REP2-195	Environment - Human Health		The Council also expresses concern that the project will lead to people avoiding the area leading to social isolation, a lack of infrastructure development and a net outflow of residents.	The human health assessment in Chapter 15: Human Health of the Environmental Statement [**APP-047**] has considered the potential positive and negative outcomes of the Scheme in respect of several determinants of health and well-being. These include neighbourhood amenity, access to social infrastructure, access to work and training, 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. The assessment concluded that there will be impacts on air quality, noise and neighbourhood amenity for some residents during construction, operation and decommissioning, and temporary impacts on accessibility and active travel during construction and decommissioning. When mitigation is taken into account, and the impacts are considered alongside the positive and neutral benefits, the overall outcome of the Scheme on human health would not be negative such that it would deter people from travelling to the area.
REP2-195	Environment – BESS – Fire Safety		Concerns over BESS safety	In recognition of the concerns raised by interested parties the Applicant has updated the outline Battery Fire Safety Management Plan [**REP2-032**] and submitted it for Deadline 2. It is considered this provides a detailed plan which ensures that the final design of the BESS will be acceptable and that in the unlikely event of a fire it would be managed safely ensuring the safety of site staff, first responders and the wider community.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
REP2-195	Environment – BESS		The council has concerns over the scale of the project and emissions.	The Statement of Need [**APP-260**] provides a robust explanation of the BESS in Sections 10 and 11. Key parts of this statement are enclosed below. There are three BESS Compounds, with maximum footprints of the compounds being up to: • Work No. 2A (Sunnica East Site A): 66,000 m^2. • Work No. 2B (Sunnica East Site B): 162,000m^2. • Work No. 2C (Sunnica West Site A): 83,000m^2. The Applicant considers the scale of BESS is reasonable relative to the amount of solar PV. Paragraph 10.4.29 notes that the proposal to include BESS as part of the Scheme is "…in accordance with emerging government policy on the need for integration measures on the electricity system to support the transition to a fully low-carbon grid. The grant of a consent for BESS at Sunnica would therefore allow the project to fulfil its ambitions in providing full support to UK action plans to deliver decarbonisation." The BESS should not emit any liquids or gases in routine operation, but does emit noise when the fans are operating. The BESS have been carefully located with respect to distance to receptors for noise and this has been assessed in Chapter 11: Noise and Vibration [**APP-043**]. This concludes that noise during operation of the project will be negligible at most residential receptors, with up to two receptors potentially experiencing minor adverse noise, which is not considered significant. This assessment is reached one the basis of worst case assumptions in the assessment, such as assuming maximum sound power levels and that the BESS will be operating at this level every second of the day, all year, which observations at existing BESS suggests is highly unlikely.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				During unplanned, non-routine events, the BESS can also generate some atmospheric emissions. This has been assessed in the Unplanned Atmospheric Emissions from Battery Energy Storage Systems (BESS) [**REP2-264**]. This concludes that in a fire event, safe levels (AEGL-1 values) are generally achieved within the Order limits, or where this is not the case, within a shorter distance than any sensitive receptors. No health criteria are therefore expected to be exceeded at sensitive receptors during a fire event. The report also concluded that the risk of a fire is unlikely, given the controls proposed in the Outline Battery Fire Safety Management Plan [**REP2-032**].
REP2-195	Environment – Soils (agriculture)		Loss of productive agricultural land that may never return	Consent would be temporary and time limited, with the solar farm being decommissioned at the end of this period. The land remains in the ownership of the farm businesses and they can reoccupy their land following decommissioning and the end of the solar farm lease. Furthermore the land can continue in agricultural production during operation of the Scheme, with sheep grazing the grassland below and between the solar panels. The agricultural land is therefore not lost. The decommissioning (after 40 years) 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. The DCO requirements are enforceable against the person with the benefit of the Order, and breach of the DCO is a criminal offence. 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

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				extent of restored areas (switchgear compound and access tracks). Ultimately, upon decommissioning, the land will be returned to the current landowners, who will then decide how the land is managed moving forward. Amendments to the Framework DEMP submitted at Deadline 2 [**REP2-028**] added the measures referred to above in relation to management and protection of soil, and also confirmed: "*Landscape and ecology mitigation will be left in situ following decommissioning; however, the Scheme will be returned to the land owner in a condition where the previous farming activities, those undertaken prior to construction, could be undertaken.*"

2.9 REP2-203 Eversheds Sutherland on behalf of National Grid Electricity Transmission PLC (NGET)

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
REP2-203	Land		NGET are concerned that the Application still includes powers for the compulsory acquisition of rights and extinguishment of rights over their operational land.	The Applicant has included rights of compulsory acquisition in the application in order to ensure that the necessary rights are available to deliver the Scheme. The use of these powers with regard to NGET's assets (which are the rights to install the cable through NGET's operational land to connect into the Burwell Substation) is currently being discussed as part of the protective provisions negotiations.
REP2-203	Land/Legal		NGET note that the dDCO is still drafted to the effect that NGET have the benefit of Work No.5 under Article 32 of the Order. As previously advised, NGET do not consider that this is necessary.	The Applicant is discussing this with NGET as part of ongoing engagement captured in the SoCG and will update the Examining Authority on the status of these discussions when the next version of the SoCG is submitted at Deadline 4.
REP2-203	Environment - Telecoms, TV, Utilities		The documentation and plans submitted for the Project have been reviewed in relation to impacts on NGET's existing apparatus and land interests located within this area. The following assets, which form an essential part of the electricity transmission networks in England and Wales are within, or in close proximity to, the Order limits: Substations • Burwell Main 400kV Substation • Burwell Main 132kV Substation Overhead Lines • 4ZM (400kV) overhead line Burwell Main – Walpole 1 • 4ZM (400kV) overhead line Burwell Main – Walpole 2	The potential impact on these assets has been assessed in Chapter 16: Other Environmental Topics [**APP-048**]. Precautionary measures have been included as part of the embedded mitigation for the Scheme. These include: locating the Scheme outside of utilities' protected zones; the use of ground penetrating radar before excavation to identify any unknown utilities; and consultation and agreement of construction/ demobilisation methods prior to works commencing. Engagement has been undertaken and is also ongoing with all statutory undertakers with apparatus with the potential to be affected by the Scheme, including NGET, to agree protective provisions that are included in the DCO. Therefore, no adverse effects are expected during construction or decommissioning. These measures are secured through the Framework CEMP [**REP2-026**] and Framework DEMP [**REP2-028**].

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
REP2-203	Environment – Misc ES		NGET is concerned that a number of the amended application documents still refer to the Promoter's proposed substation as the 'Burwell National Grid Substation Extension' or 'National Grid Substation Extension Burwell'. Again, as previously advised in NGETs Relevant Representation, the Promoter's substation would need to be renamed as it will not be a NGET asset. Additionally, following the removal of Option 1 from the dDCO, it is understood that the Promoter's substation will now not be located at Burwell.	There are still currently two options to connect the Scheme to the existing Burwell substation at 400kV: • Option 2: Burwell National Grid Substation Extension – a 132kV to 400kV transformer to the north of the existing Burwell substation; and • Option 3: 33kV to 400kV transformers located within the onsite substation within Sunnica East Sites A and B and Sunnica West Site A. The reference to 'Burwell National Grid Substation Extension' or 'National Grid Substation Extension Burwell' has been utilised to identify Option 2 and is not a reference to ownership. As outlined in Section 1.2.1 of the Change Application [**AS-243**], the Option 2 Burwell Nation Grid Substation Extension would be retained by the owner of the Sunnica Energy Farm and it would not be owned or operated by National Grid. The substation would include transformers to connect the 132kV cables connecting to the solar farm with the 400 kV transmission network. In other words, the "extension" would not form part of National Grid's assets or undertaking.
REP2-203	Protective Provisions		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 currently in negotiations with the Promoter in relation to the protective provisions for inclusion within the DCO along with any supplementary agreements which may be required. NGET will keep the Examining Authority updated in relation to these discussions.	The Applicant confirms it has been in contact with National Grid's (jointly NGET and NGG) lawyers to negotiate protective provisions since March 2021. Substantive negotiations commenced in July 2021 and are currently at an advanced stage.

2.10 REP2-204 Eversheds Sutherland on behalf of National Grid Gas Plc (NGG)

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
REP2-204	Land		NGG are concerned that the inclusion of compulsory acquisition powers over their land where their assets are located will cause serious detriment to their ability to comply with their statutory duties.	The Applicant has included rights of compulsory acquisition in the application in order to ensure that the necessary rights are available to deliver the scheme. The use of these powers with regard to NGG assets is currently being discussed as part of the protective provisions negotiations.
REP2-204	Environment - Telecoms, TV, Utilities		The documentation and plans submitted for the Project have been reviewed in relation to impacts on NGG's existing apparatus and land interests located within this area. 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	The potential impact on these assets has been assessed in Chapter 16: Other Environmental Topics [**APP-048**]. Precautionary measures have been included as part of the embedded mitigation for the Scheme. These include: locating the Scheme outside of utilities' protected zones; the use of ground penetrating radar before excavation to identify any unknown utilities; and consultation and agreement of construction/ demobilisation methods prior to works commencing. Engagement has been undertaken and is also ongoing with all statutory undertakers with apparatus that has the potential to be affected by the Scheme, including National Grid Gas, to agree protective provisions that are included in the DCO. Therefore, no adverse effects are expected during construction or decommissioning. These measures are secured through the Framework CEMP [**REP2-026**] and Framework DEMP [**REP2-028**].
REP2-204	Legal		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	The Applicant confirms it has been in contact with National Grid's (jointly NGET and NGG) lawyers to negotiate protective provisions since March 2021. Substantive negotiations commenced in July 2021 and are currently at an advanced stage.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
			may be required. NGG will keep the Examining Authority updated in relation to these discussions.	

2.11 REP2-206 Addleshaw Goddard LLP on behalf of Network Rail Infrastructure Limited

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
REP2-206	Land		Network Rail and the Promoter are negotiating a private agreement to regulate the manner in which rights over railway property are acquired and works carried out and to safeguard Network Rail's statutory undertaking. Engineers for Network Rail are in the process of reviewing the extent of impacts on operational railway and Network Rail property and any mitigation required.	The Applicant has been in regular correspondence with Network Rail's surveyors and is presently considering the comments within their amended heads of terms. The Applicant is also preparing revised technical clearance documents following the acceptance of the Change Application and hopes that both matters will be concluded prior to the end of the examination.
REP2-206	Environment - Transport		The Promoter intends to route construction traffic over the Exning Road overline bridge, located to the south-west of Snailwell, Suffolk, which passes over the Anglian line (Bridge). The maximum number of HGVs crossing the Bridge would be 21 two-way movements (42 movements total) per day during the construction phase, peaking at 41 two-way movements (102 movements total) per day in month two. Network Rail engineers are in the process of reviewing the potential impacts of these additional movements on the structural integrity of the Bridge and, consequently, the Anglian line. Their initial view is that the existing road profile at Exning Road provides poor visibility and additional vehicle movements will increase the risk of collision between vehicles or the Bridge itself. This increases the risk that debris or other materials could obstruct or damage the railway line beneath the Bridge. The risk could be mitigated by improving the signage in the vicinity of the Bridge. Network Rail continues to investigate the extent of this risk and will liaise with the Promoter in relation to any mitigation required.	The Applicant is in discussions with Network Rail regarding the concern raised. HGV deliveries for Sunnica West Site A: Site Access B (Chippenham Road) and Sunnica West Site B: Site Access D (Fordham Road) will use the Exning Road overline bridge on Snailwell Short Road. As illustrated in Plate 2 in the Transport Assessment [**APP-117**] the peak number of HGV deliveries per day for Sunnica West Site A: Site Access B (Chippenham Road) is 20 HGVs per day which will occur during construction month 3. Also, the peak number of HGV deliveries for Sunnica West Site B: Site Access D (Fordham Road) is five HGV deliveries per day during month 7 and month 9. The combined peak number of HGVs that are forecast to use Exning Road overline bridge on Snailwell Short Road is during month 7 with 23 HGV deliveries (46 movements) per day. It is noted that NR's previous inspection (03/07/2010) identified the bridge to have a Structures Condition Marking Index (SCMI) of 92, where a score above 80 indicates excellent condition. Whilst the age of the inspection is noted, the Applicant is not aware of any contrary information regarding the structural condition of the asset. It is understood that NR is reviewing the extent of the risk to the structure of the Exning Road bridge and will liaise with the

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				Applicant in relation to any mitigation required. As stated within Network Rail's Written Rep, the Applicant and Network Rail are continuing to liaise on all matters and are confident that this will be completed before the close of the examination.
REP2-206	Protective provisions		Network Rail require protective provisions to be included within the DCO to ensure that its interests are adequately protected and to ensure compliance with the relevant safety standards. Good progress has been made between the parties on the form of protective provisions to be included in the DCO.	The Applicant confirms that good progress has been made with negotiating the form of protective provisions to be included in the DCO.

2.12 REP2-207 Newmarket Town Council

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
REP2-207	Consultation	2.0	Sunnica Ltd's consultation process has been completely inadequate and has left many of our residents in the dark about the construction, operation and decommissioning of the Sunnica site.	The Applicant disagrees with this assessment. The Applicant's pre-application consultation activity is summarised in the Consultation Report [**APP-026**]. Information on the construction, operation and decommissioning of the site was made available during the statutory consultation. The Planning Inspectorate found that the Applicant had complied with its pre application consultation requirements when it accepted the Application for Examination.
REP2-207	Alternatives	2.2	Solar generation on agricultural land should not be considered when the rooftops of warehouses can be used instead.	Whilst the Applicant is supportive of decentralised smaller scale solar developments, such as the installation of solar panels on warehouse rooftops, these would not negate the need for the Scheme and would not represent a reasonable alternative to the Scheme. Draft NPS EN-1 paragraph 3.3.13 acknowledges the role that decentralised and community energy systems can play in helping to reduce carbon emissions and achieve energy security. However, it goes on to explain that this alone will not be sufficient to meet the need for renewable energy generation. It states that *"the government does not believe they* [decentralised and community energy systems] *will replace the need for new large-scale electricity infrastructure to meet our energy objectives"*. Paragraph 3.3.14 of Draft NPS EN-1 goes on to set out that large-scale centralised electricity generating facilities have numerous economic and other benefits, including the more efficient bulk transfer of power, which enables surplus generation capacity in one area to be used to cover shortfalls elsewhere.
REP2-207	Environment - Landscape and Visual		The landscape surrounding the town has played a pivotal part in its history and encouraged the establishment of horseracing in Newmarket. The	The Landscape and Visual Impact Assessment (LVIA) summarised in Chapter 10 of the ES [**APP-042**] defines the character of Newmarket at its immediate landscape setting with

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
			Sunnica Industrial site will essentially industrialise the countryside of the area, destroying this renowned landscape. The "rising ground" of Warren Hill has offered panoramic views over the unique, unspoilt landscapes of the Horseracing industry for centuries. There will be a particular impact on the iconic view across the fields to Ely Cathedral, 20km away – this is a cherished view which draws people to climb Warren Hill on a clear day.	reference to the following Local Landscape Character Areas (LLCA) defined by the Applicant: • LLCA 40: Exning • LLCA 41: Newmarket • LLCA 26: Limekilns and gallops • LLCA 27: Newmarket studs • LLCA 39: Burwell wooded chalklands • LLCA 42: Newmarket racecourse • LLCA 43: Burwell chalklands Analysis of these LLCA demonstrates that, whilst there are some common characteristics which relate the town to its setting and contribute to sense of place, there are also clear local variations. The Applicant agrees that its history and heritage contribute to its character, but it is important to note that this is not a static character and that it has changed substantially over time. This is clearly evident from a comparison of Ordnance Survey maps published over the past 150 years and the paintings presented in REP2-207. The town has grown considerably, particularly in the post-world war two period as horseracing developed from a pastime to an international industry. The human influence on this landscape is evident throughout and the Scheme will not destroy this landscape. No part of the Scheme would be located within these LLCA, with the exception of a section of Cable Route B north of Landwade, approximately 3.4km north west of the urban edge of Newmarket. The LVIA has separately assessed impacts on the landscape as a resource in its own right and on peoples' views of the landscape and their visual amenity. Intervisibility between the Scheme and Newmarket will be limited to LLCA 26, due to the openness and sloping aspect. The Scheme will be visible from the Limekilns Gallops, as evidenced in the photomontage

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				presented in Figure 10-100 [**APP-230**] and the Applicant has assessed the residual visual effects to be moderate adverse at year 15 of operation, which is significant. Views of Ely Cathedral, which are difficult to perceive with the naked eye, will be preserved. As no part of the Scheme falls within LLCA 26, impacts on its character relate to its setting, which is defined in part by the site but also includes the busy A14 and A11 trunk roads and railway lines. The key characteristics listed in Appendix 10E [**APP-104**] would remain and the significance of effect has been assessed as minor adverse by year 15 of operation. No part of the Scheme will be perceptible from Warren Hill, which lies immediately to the east of town centre on ground sloping to the west.
REP2-207	Environment - Socio-economics	2.5	The project will have an adverse impact on Newmarket as a tourist destination and consequently local businesses. In particular, the project will impact visitor views of the countryside.	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.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
REP2-207	Environment - Transport		Effect on traffic through the town. Use of A14 junction is the junction used to serve Tesco, and is likely to effect those travelling to Tesco.	As shown in the flow plots in Annex F of the Transport Assessment [**APP-117**], during the construction period, it is not anticipated that construction staff will use Fordham Road (south of the A14) to travel to/from the site. Construction staff will be directed to use the Strategic Road Network in the vicinity of the Site, including the A11 and A14. Furthermore, whilst Tesco will be open at these times, the level of traffic on the network will be low at development peak times (0600-0700 hours and 1900-2000 hours). Therefore, during the development peak hours, there will be a minimal impact on the junction used to serve Tesco. Table 13-33 in the Transport and Access chapter of the ES [**APP-045**] details that peak construction period traffic will not result in significant effects for vehicle travellers in terms of driver delay, accidents and safety. In addition, the peak construction traffic will not result in significant effects on Non-Motorised Users (NMUs) in terms of severance, pedestrian delay, pedestrian/cycle amenity, fear and intimidation and accidents and safety. Fordham Road (south of the A14) is not part of the designated HGV routes for the Scheme which are provided in Chapter 4 of the Framework Construction Traffic Management Plan and Travel Plan [**REP3-013**] submitted at Deadline 3. Therefore, the HGV deliveries associated with the construction of the Scheme will not impact the operation of the Tesco junction or people travelling from Newmarket.
REP2-207	Environment - Transport		Newmarket is a bypass to the A14 when there is an accident. This will get worse when there are HGVs travelling to Sunnica	In the infrequent event of an A14 closure, Sunnica traffic will need to follow the diversions established by National Highways and the Local Highways Authorities. If the A14 between Junction 37 and 38 was closed, 109 daily HGVs associated with the Scheme would be diverted from the A14 during the peak construction period. This equates to circa 11 HGVs per hour over a 10-hour delivery window. Any diversions and traffic

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				management that National Highways put in place for any works on the Strategic Road Network need to be suitable to accommodate all traffic on the network, of which the proportion associated with Sunnica is minimal. It is therefore reasonable to conclude that the use of any diversionary routes would not result in additional impacts requiring assessment.
REP2-207	Environment – BESS – Fire Safety	Reference 20031344 Jockey Club comments	We also have real concerns about the inclusion of batteries in the scheme. We do not understand how many batteries will be included and we ask that Sunnica provide that information. We understand that if one of these batteries were to leak or explode, the evacuation required would be over a large radius.	In recognition of the concerns raised by interested parties the Applicant has updated the outline Battery Fire Safety Management Plan [**REP2-032**] and submitted it for Deadline 2. It is considered this provides a detailed plan which ensures that the final design of the BESS will be acceptable and that in the unlikely event of a fire it would be managed safely ensuring the safety of site staff, first responders and the wider community. It also includes indicative layouts for the BESS. Detailed information of the BESS system will be provided at the design selection stage. It must be emphasised that the general design principles outlined in the Plan and the stipulated testing and certification for the BESS system ensure that evacuations would definitely not be required over a large radius.
REP2-207	Environment – BESS	Appendix - Representations from local residents	I am horrified to learn that if the proposed plan by Sunnica goes through we will be looking at fields of glass solar panels and maybe high batteries Speaking to a top consultant specialising in nuclear energy, we have been informed that this energy is limited in how it is stored [by panels], therefore resulting in the need for many batteries to allow this to be effective. We have real concerns about the inclusion of batteries in the scheme. We do not understand how many batteries will be included and we ask that Sunnica provide that information.	Chapter 10 Landscape and Visual Amenity of the ES [**APP-042**] provides an assessment of impacts of the project on landscape and visual amenity. BESS is specifically described below. Paragraph 10.7.4 of the Landscape and Visual assessment explains design principles have been incorporated across the Sunnica East Sites A and B by: • Siting the BESS in E33 adjacent to reservoirs and Lee Farm, so that its massing and land uses are perceived in the context of existing infrastructure features and built structures in the landscape. • Siting the BESS in E18 so that it is enclosed and screened by existing woodland along its northern edges

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
			We understand that if one of these batteries were to leak or explode, the evacuation required would be over a large radius. Who would pay for the loss of revenue to our businesses? This is also a great concern to the surrounding stud farms being able evacuate their world class horses, where would they go assuming they could evacuate safely in time?	and in part by roadside vegetation adjacent to Elms Road to its south-east. • The tonal rendering of shades which are suitable to integrate within the landscape will help reduce the perceived overall mass of these structures, secured via the OEMP [**REP2-030**]. And with regards to Sunnica West Site A and Sunnica West Site B by: • Siting the BESS within W17, so that it is in part adjacent to existing barns and bordered by the mature woodland of Sounds Plantation which aids in screening the structures from the west and in views from the east, their suitable rendering in the context of the woodland, to aid in reducing the perceived overall massing of the structures. The Landscape and Visual assessment does not identify any significant landscape or visual effects associated with BESS. Effects are summarised as follows: • There will be some changes in landscape and visual effects during construction associated with clearance and works for the BESS. • For Year 1 of operation, paragraph 10.8.194 identifies there would be middle distance views of the upper parts of the BESS in Sunnica East Site A for recreational users along part of the River Lark, motorists on East Fen Road, and residents in East End. Paragraph 10.8.195 identifies the upper parts of the BESS in E33 would be visible at close range for motorists travelling along Ferry Lane. The massing of the BESS would be softened by their tonal rending, but the structures would represent a noticeable change in the composition of views in Year 1.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				• For Year 1, the upper parts of the BESS would be visible to the north of the Elms in Sunnica East Site B. • For Sunnica West Site A, Year 1 effects would be softened by their tonal rendering and siting adjacent to Sounds Plantation, to provide a degree of enclosure in relation to the wider landscape to the south, across the Limekilns. Paragraph 10.8.256 identifies that from within Chippenham and Chippenham Park, the BESS across the Sunnica West Site A would not be visible, due to the intervening buildings and mature woodland and boundary wall along the edge of the Park. Paragraph 10.8.257 identifies that the upper parts of the BESS would be visible, although their massing would be softened by their tonal rendering and that they would be seen against the backdrop of Sounds Plantation. • In Year 15, paragraph 10.8.320 notes that the new tree planting would have established along the eastern edges of E02, E04, E08, E10 and E33, to reinforce the existing pattern of roadside vegetation and increase the enclosure of the BESS in E33 and reduce their perception from the wider landscape. • The visibility of the upper parts of the BESS and solar stations in E01 to E05 would be substantially reduced by the establishment of the proposed planting around the edge of E05 and adjacent to E01 by Year 15, in relation to views from recreational users along the River Lark and motorists on East Fen Road and Sheldrick's Road for Sunnica East Site A. Views would also be screened in relation to views from motorists travelling along Ferry Lane, by the establishment of the proposed trees above the roadside hedgerow. • BESS in Sunnica East Site B in Year 15 would be enclosed by the combination of the proposed tree

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				planting within E18 and the existing trees to the north of the parcel. The planting would enclose the solar panels, BESS and substation to a greater degree than compared to year 1 and reduce the adverse impacts to the aesthetic value of the landscape and the perception of the Scheme. • Paragraph 10.8.380 notes that centrally within the Sunnica West Site A, the establishment of the woodland bordering W17 would enclose the BESS and aid in reducing their perception in Year 15. As per the year 1 assessment, the BESS across the Sunnica West Site A would not be visible due to the intervening buildings and mature woodland and boundary wall along the southern edge of Chippenham Park. Newmarket Town Council is correct that the solar PV modules do not store energy and BESS is needed to achieve this. The Statement of Need [**APP-260**] reinforces this and Section 11 (Paragraph 11.1.2.3) of the Statement of Need concludes that "BESS are an essential technology for high-RES [Renewable Energy Sources] electricity system… BESS play essential roles in the provision of those services necessary to keep power flowing to all consumers, as well as integration measures which help balance supply and demand, thereby reducing the need for carbon-intensive back-up generation." The concerns of the council are noted. The BESS should not emit any liquids or gases in routine operation, but does emit noise when the fans are operating. The BESS have been carefully located with respect to distance to receptors for noise and this has been assessed in Chapter 11: Noise and Vibration [**APP-043**]. This concludes that noise during operation of the project will be negligible at most residential receptors, with up to two receptors potentially experiencing minor adverse noise, which is not considered significant. This is based on worst case assumptions in the assessment, such as assuming maximum

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				sound power levels and that the BESS will be operating at this level every second of the day, all year, which observations at existing BESS suggests is highly unlikely. During unplanned, non-routine events, the BESS can also generate some atmospheric emissions. This has been assessed in the Unplanned Atmospheric Emissions from Battery Energy Storage Systems (BESS) [**REP2-064**]. This concludes that in a fire event, safe levels (AEGL-1 values) are generally achieved within the Order limits, or where this is not the case, within a shorter distance than any sensitive receptors. No health criteria are therefore expected to be exceeded at sensitive receptors during a fire event. The report also concluded that the risk of a fire is unlikely, given the controls proposed in the Outline Battery Safety Management Plan [**REP2-032**]. Based on the assessment no health effects are anticipated at surrounding stud farms or any evacuation needed. It is not expected therefore that there would be any loss of revenue for the stud farms if there was an unplanned event. The Applicant disputes that the number of batteries needs to be known within the BESS compounds to carry out adequate assessment of effects. This is not relevant to the assessment of effects or risks, which are dependent on maximum parameters such as height, footprint, and location, rather than the number of containers or cells within this area.
REP2-207	Environment – Soils (agriculture)	2.1	1. Site is High Quality Agricultural Land important for national food security 2. Cannot afford to lose agricultural land to industrial solar 3. Solar will be detrimental to land quality 4. Post solar land will be taken for industry	1 Detailed ALC survey of agricultural land at the Sunnica site found predominantly grade 3b and 4 – not best and most versatile land. As stated in The Applicant's Responses to Relevant Representations [**REP1-016**], 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

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				use. This means that it is lower quality land, not classified as Best and Most Versatile land (BMV). The ALC assessment (to determine the grades of the soil, and therefore the amount of BMV within the Order limits) 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. Drought is the primary limitation for the land, with shallow, light soils and a dry, warm climate. Cropping for higher margin crops such as potato is heavily dependent on irrigation in this area. Volume of water that can be abstracted is strictly limited by abstraction licences in normal years. The 2022 drought has cut farmers access to water and increased crop demand, with a detrimental effect on crop yield and quality. Abstraction limits are anticipated to remain heavily restricted for irrigation well into the 2023 growing season given the length of time without further drought that the aquifer and river levels will need to recover. The Defra UK Food Security Report (2021) is clear that the key future risks are climate change and soil degradation. The Applicant has set out in its response at Procedural Deadline B [**PDB-001**] why food security/production is not a principal issue for consideration in the examination, but instead it is the use of BMVL that should be examined given it is BMVL that falls within planning policy and specifically the Energy

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				NPSs, draft Energy NPSs and the NPPF. 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. 2 Agricultural land is not lost to solar farm development. The solar farm consent is temporary and the solar infrastructure is reversable. Agricultural land use of the solar farm can continue with the perennial green cover below and between solar panels being grazed by sheep. It is also noted that the Scheme responds to an urgent need for renewable energy generation, and further detail in this respect can be found in the Applicant's Statement of Need [**APP-260**]. 3 The solar farm will not be detrimental to land quality. On decommissioning the land will be able to resume its current arable management without any productivity impairment from the solar farm. As the solar farm will have a perennial green cover, soil health will benefit from a 40 year fallow period, enabling the recovery of soil organic matter. The Applicant notes that measures have been included in the Framework Construction Environmental Management Plan [**REP3-015**] (Table 3-7), Framework Operational Environmental Management Plan [**REP2-030**] (Table 3-6) and the Framework DEMP (Table 3-7) aimed at protecting the soil resource during construction, operation and decommissioning of the Scheme. 4 Temporary planning consent for a solar farm does not change the designation of land to a brownfield site. The Scheme is required, by a DCO requirement, to be decommissioned pursuant to an approved Decommissioning Environmental Management Plan (DEMP). That requirement is enforceable against the person with the benefit of the Order and

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				failure to comply is a criminal offence. The Framework DEMP [**REP2-028**] requires the land to be returned to the landowner as follows, in order to allow continuation of previous activities (subject to landscape and ecological mitigation): *Landscape and ecology mitigation will be left in situ following decommissioning; however, the Scheme will be returned to the land owner in a condition where the previous farming activities, those undertaken prior to construction, could be undertaken.* Any future proposed change of use or development of the Order limits land following decommissioning would require planning or development consent. The baseline for consideration of an application for such a consent would be the post-decommissioning status of the land, which would be greenfield land.

2.13 REP2-219 Ramblers, Newmarket and District Group

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
REP2-219	Land		The Scheme should consider the potential for the creation of additional public rights of way (PRoW) along the grid connection route.	The Scheme proposes new permissive routes; at Beck Road, to the north-west of Sunnica East Site A; south of Freckenham Road, to the north-east of Sunnica East Site B (two new routes intersecting the existing diagonal unclassified bridleway U6006); and on Elms Road, to the south of Sunnica East Site B. Details regarding this can be found in the Applicant's Consultation Report [**APP-026**]. The Applicant does not consider the creation of permanent public rights of way within grid connection routes A and B to be appropriate as it has sought to minimise the impact on landowners along the cable route and limit the interference with those landowners' rights and land.
REP2-219	Environment - Landscape and Visual		The farmed countryside, even with very limited access, is pleasing to the eye but, should the scheme go ahead, this will be exchanged for a fenced industrial landscape, alien to the area, and not a good legacy to leave for those generations who follow us during the next forty years or so.	The landscape within the DCO site and the study area for the Landscape and Visual Impact Assessment (LVIA) summarised in Chapter 10: Landscape and Visual Amenity of the ES [**APP-042**] is the product of centuries of human intervention. Whilst it includes some semi-natural features and distinctive characteristics, it is principally a landscape of intensive agricultural production, with other modern rural land uses. Landscape character is not static and evidence of change is visible throughout the landscape. For example within and around Sunnica East Site B where extensive pig farming and quarrying previously extended across the landscape. The LVIA acknowledges that there will be some residual effects on the character of the landscape. However, the Scheme has been designed to minimise effects on the landscape and people's views of the landscape, by integrating the development within the existing landscape framework and through extensive woodland, hedgerow and tree planting. As noted in the written representation [**REP2-219**], there are few existing PRoW in the area and few which intersect the

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				permanent parts of the Scheme. The integration of existing PRoW and new permissive routes to enhance public access to the countryside have been key considerations in the design of the Scheme, as set out in the Design and Access Statement [**APP-264**]. The visual impacts on users of PRoW are summarised in Chapter 10 of the ES [**APP-042**]. Offsets from PRoW are embedded into the Scheme design and planting is proposed where appropriate to provide visual screening whilst retaining the legibility of features on the skyline in longer views, such as landmarks and pine lines. An example is Bridleway W-257/007/0, which will run adjacent to the edge of ECO2, enhancing the setting of the route by providing extensive areas of native grassland and connecting with a new permissive route adjacent to Beck Road connecting with Isleham to the west.
REP2-219	Environment - Socio-economics		Details on how existing public rights of way (PRoW) may be impacted by the project needs to be provided with appropriate measures in place to ensure the PRoW are protected or suitable replacement routes are provided.	Chapter 12: Socio-economics and Land Use of the ES [**APP-044**] has assessed the impact of the Scheme on PRoW. The Scheme has been designed to minimise the number and duration of PRoW closures, including along the cable route. If closure of routes is required then as a worst-case scenario, it has been assumed that the PRoW would be closed for no more than three weeks, and therefore not considered to have a significant or long-term impact. The Framework CEMP [**REP3-015**] includes a requirement for a condition survey to be undertaken of all PRoW prior to closure and for the PRoW to be restored to their previous condition following any closure.
REP2-219	Environment – Soils (agriculture)		Land appears to be in arable production.	The current use of the land is not a relevant consideration in terms of policy requirements, and it is the use of Best and Most Versatile Land (BMVL) that should be examined given it is BMVL that falls within planning policy and specifically the Energy NPSs, draft Energy NPSs and the NPPF.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				The combined detailed surveys for the Scheme found agricultural land in ALC Grades 3a, 3b and 4. With no land in Grades 1 or 2, the Grade 3a land is the only best and most versatile agricultural land within the Sites. The distribution of ALC grades within the Sites is shown on Figures 12-2 and 12- 3 of Chapter 12: Socio-Economics and Land Use of the ES [**APP-044**]. The Ministry of Agriculture, Fisheries and Food ALC guidelines direct that ALC grades are defined by reference to physical characteristics, grading guidance and cut off limitations. Natural England 'Technical Information Note 049 – Agricultural Land: protecting the best and most versatile agricultural land (TIN049)' also notes that current agricultural use or intensity of use does not affect ALC Grade. The site has light textured and shallow soils, with a relatively warm and dry climate. Drought imposes a substantial constraint on the quality and versatility of this agricultural land.

2.14 REP2-220 Reach Parish Council

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
REP2-220	Planning		Compliance of the 'Option 2' extension to Burwell National Grid Substation with planning policy.	Chapter 3: Scheme Description of the ES [**REP2-022**] describes the Option 2 extension to Burwell National Grid Substation and the Planning Statement [**APP-261** to **APP-263**] considers the Scheme in the context of planning policy. 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. These factors justify the selection of the 'Option 2' site and demonstrate good design.
REP2-220	Environment - General EIA		Reach PC supports the principle of green energy generation but is unconvinced of the claimed environmental benefits of Sunnica's application. Reach PC has concerns that the Scheme is not as sustainable as it claims, being too focused on electricity storage and trading rather than green electricity generation. We are aware that Cranfield University has written a paper on the Sunnica application. Cranfield concludes Sunnica has overestimated the output of the Scheme and as a consequence Sunnica will create more carbon than it saves during its lifetime. The failure to meet this key criterion undermines the justification of a scheme that will disrupt many lives and communities	Please refer to Appendix A for the Applicants response to the Cranfield University Response.
REP2-220	Environment - Landscape and Visual		Reach Parish Council considers that the proposal would create a sizeable, visually intrusive presence in the landscape and would greatly contribute to the increasingly urbanised or industrialised feel of the south east end of Burwell Fen and the Weirs Drove	Chapter 3: Scheme Description of the ES [**REP2-022**] describes the Option 2 extension to Burwell National Grid Substation. This option lies with Local Landscape Character Area (LLCA) 36: Burwell Fen, defined by the Applicant in the Landscape and Visual Impact Assessment (LVIA) summarised in Chapter 10:

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
			area, significantly and irrevocably damage the character of Burwell Fen. The site would be particularly visible from the north east end of Devil's Dyke SSSI, from Burwell Road which is a main gateway to the village of Reach, from the banks of Reach Lode and from the footpaths of Wicken Vision land.	Landscape and Visual Amenity of the ES [**APP-042**]. At the county level it falls within Area 2: Fenlands, defined within the Cambridge Landscape Guidelines. The effects on the landscape at both scales has been assessed by the Applicant as not significant in all assessment scenarios. 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. The existing substation is a feature in existing views from the edge of Reach looking north, as illustrated by viewpoints 55 to 58 and the proposed Option 2 extension of the substation would be seen in this context. The effects of this change would not be significant. However, as set out in the Heritage and Substation Connection Update submitted also at Deadline 3A, the Applicant is now in a position where Option 2 is able to be removed from the Scheme; and will be bringing forward a Change Application to remove it.
REP2-220	Environment – Soils (agriculture)		Option 2 site is ALC Grade 2	The site has been subject to a detailed ALC survey in line with Natural England's TIN049. Agricultural land is predominantly Grades 3b and 4 with a minor area of Grade 3a land.
REP2-220	Environment - Transport		Work to construct the site would require significant HGV traffic, some of it of exceptional size.	The level of HGV traffic for the construction of the Scheme is set out and assessed in the Transport Assessment [**APP-117**]. Table 6-1 of the Transport Assessment [**APP-117**] provides a summary of the forecast daily HGVs per construction month. A peak number of 155 HGV deliveries per day are forecast across the Order Limits during month 3 of the construction period. This amount of HGV traffic will be short term. The average number of daily HGV deliveries between month 1-8 will be 119 which will then reduce to a daily average of 38 HGV deliveries between months 9-24.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				Chapter 7 of the Framework Construction Traffic Management Plan and Travel Plan [**REP3-013**] (which was updated at Deadline 3) sets out significant embedded mitigation, including measures to control the arrival and departure of HGVs for the site. The timing restrictions are: a. No arrivals or departures on a Weekday between 08:00 and 09:00, and between 17:00 and 18:00; b. No arrivals or departures on a Saturday before 08:00 or after 13:00; and c. No arrivals or departures on Sundays or public holidays. No HGV deliveries will be programmed outside of staff working hours, i.e. before 0700 hours or after 1900 hours on a weekday, in addition to the restrictions above. The Delivery Management System (DMS) will be implemented to control bookings of HGVs. A Traffic Management and Monitoring System (TMMS) will also be developed as set out in chapter 7 of the updated Framework Construction Traffic Management Plan and Travel Plan [**AS-300**, **AS-301**]. The Transport and Access chapter of the ES [**APP-045**] assesses the peak daily HGV traffic forecast to be associated with the construction of the Scheme. Table 13-33 in the Transport and Access chapter of the ES [**APP-045**] details that peak construction period traffic will not result in significant effects for vehicle travellers in terms of driver delay, accidents and safety. In addition, the peak construction traffic will not result in significant effects on Non-Motorised Users (NMUs) in terms of severance, pedestrian delay, pedestrian/cycle amenity, fear and intimidation and accidents and safety. The temporary measures required to accommodate the movements of the AILs are identified within Framework Construction Traffic Management Plan and Travel Plan [**REP3-013**] with physical measures including temporary removal of

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				street furniture to accommodate the swept path of the AILs where it overhangs the verge referenced throughout Chapter 5. All the identified measures are temporary and are reflected in Part 2 of Schedule 5 to the draft DCO [**REP2-042**] to be carried out at the corresponding locations shown on Access and Rights of Way Plans [**REP2-006**]. No permanent physical mitigation works are required. As part of the AIL route review prior to transporting the AIL, conditional surveys would be undertaken at all necessary locations along the vehicle route. An experienced haulier who specialises in AILs would be responsible for the final route and coordination with the relevant authorities e.g., the police and the local highway authorities. The haulier will identify potential measures to limit or avoid damage, such as temporarily strengthening the footway, in consultation with the local highway authority. The obligation on the undertaker to carry out the conditional surveys is secured by paragraph 7.2.14 of the Framework Construction Traffic Management Plan and Travel Plan [**REP3-013**], compliance with which is secured by requirement 16 contained in Schedule 2 to the draft DCO.
REP2-220	Environment – BESS – Fire Safety	4	Reach PC also believes that the battery technology Sunnica proposes to use to store electricity carries a significant fire risk which poses a threat to public health and the environment. In particular we have reservations about Sunnica's modelling of the impact of a fire in one of its battery storage units and consider that it has adopted benign assumptions about how any such fire would progress including the temperature of the fire, the number of batteries caught in the fire and extent of spread between battery stacks, about wind direction and strength and the ability of combustion gases to vent from a container. Accordingly, we suspect that the true risk of a fire becoming a conflagration is not captured in	In recognition of the concerns raised by interested parties the Applicant has updated the outline Battery Fire Safety Management Plan [**REP2-032**] and submitted it for Deadline 2. It is considered this provides a detailed plan which ensures that the final design of the BESS will be acceptable and that in the unlikely event of a fire it would be managed safely ensuring the safety of site staff, first responders and the wider community. Dispersion modelling undertaken in Appendix 16D models a worst case scenario, and shows no risk to health or life outside of the application boundary. As stated in the plan the BESS system selected for Sunnica will have completed UL 9540A testing which defines and quantifies gas emissions produced during thermal runaway. This data will

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
			Sunnica's assessments and assurance. We believe that the likelihood of a major incident with a legacy of long-term environmental and public health damage is significantly under-estimated.	then, if necessary, be used for specific BESS consequence modelling for the Sunnica site. A key priority of this dispersion modelling is to ensure that respondent exposure to any level of emissions from a BESS thermal runaway incident are minimised and the ERP provides clear alert protocols and safety guidelines.

2.15 REP2-223 Red Lodge Parish Council

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
REP2-223	Need	P8, Para 1	Red Lodge Parish Council are concerned that Sunnica appear to be over-sizing the BESS for increased profits rather than to support the energy produced from the solar panels	The Applicant's Response to the First Written Questions – Appendix B [**REP2-038**], which was published after Red Lodge Parish Council's Written Representation and provides additional information and context around the purpose and size of the proposed BESS in the context of whether it is Associated Development to the Solar PV development. Paragraphs 21 – 24 of that document explain the rationale behind the proposed sizing of the BESS in relation to the size of the grid connection and of the proposed Solar PV development.
REP2-223	Need	P11, last para -> p12, 2nd para	Red Lodge Parish Council do not believe that solar is an enduring source of energy for 40 years.	The Applicant respectfully disagrees. Paragraph 3.3.13 of the Statement of Need [**APP-260**] describes that solar generated 11.7TWh of power in 2019 and 12.1TWh in 2020. Section 5.1 of the Statement of Need introduces National Grid's Future Energy Scenarios (FES) document, and the projections National Grid make for electricity demand and generation supply. Out to 2050 and whether they are likely or not to meet Net Zero 2050. The 2022 FES update (published post submission) states that in 2021 solar generated 13.8TWh, compared to 300TWh of power generated by all assets in 2021 (including net interconnector imports). Solar power therefore contributed approximately 5% of national electricity requirements in 2021. Three of the 2022 FES scenarios are likely to meet Net Zero. National Grid's projections of electricity generation from solar power as a proportion of all electricity generation (including interconnector imports) in the UK, increase to 7-12% by 2035 across these three scenarios, and are projected to be between 6-13% by 2050. The Government's Energy White Paper of 2020 states categorically their view that "A low-cost, net zero consistent system is likely to be composed predominantly of wind and solar."

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
REP2-223	Environment – Soils (agriculture)		Cropping not typical of ALC Grade 3b or lower	The current use of the land is not a relevant consideration in terms of policy requirements, and it is the use of Best and Most Versatile Land (BMVL) that should be examined given it is BMVL that falls within planning policy and specifically the Energy NPSs, draft Energy NPSs and the NPPF. MAFF ALC guidelines (October 1988) direct that ALC grades are defined by reference to physical characteristics, grading guidance and cut off limitations. Natural England document TIN049 also notes that current agricultural use or intensity of use does not affect ALC Grade. The ALC assessment (to determine the grades of the soil, and therefore the amount of BMVL within the Order limits) presented for the Sunnica application is a combination of survey work by three organisations. In addition to the work commissioned for the Applicant, 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.
REP2-223	Environment - Noise		Red Lodge Parish Council have concerns about the potential noise impact.	Mitigation measures for construction are set out in [**REP3-016**] Appendix 16C-CEMP. Control of Noise during construction phase: A display board will be installed on-site and a website will be set up. These will include contact details for the Site Manager or alternative public interface with whom complaints can be lodged. A log book of complaints will be prepared and managed by the Site Manager. Applications for Section 61 consents, variations and dispensations under the Control of Pollution Act 1974 (COPA) will be submitted to the relevant local planning authority for all construction activities that are required to be undertaken.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				Noise monitoring will be undertaken throughout construction. Best Practicable Means (BPM) will be applied (refer to Table 3-6 Noise and Vibration, in [**REP3-016**] Appendix 16C CEMP), as far as reasonably practicable, during construction works to minimise noise and vibration at noise sensitive receptors, including neighbouring residential properties and other sensitive receptors arising from construction activities. During operation phase (Refer to [**REP2-030**] Appendix 16F-OEMP, Table 3-6 Noise and vibration): As the plant design is progressed, the specification of plant machinery with low noise emission and properly attenuated supply and extract terminations will help to minimise noise emissions. The use of enclosures, local screening, mufflers, and silencers will also be used as appropriate. Should the noise exhibit any such acoustic features then the relevant penalty/ correction should be applied in accordance with BS 4142. Plant such as the substation and batteries will be designed to have minimal tonal, impulsive or intermittent features. Control of Noise during decommissioning phase Refer to [**REP2-028**] Appendix 16E-DEMP: Applications for Section 61 consents, variations and dispensations under the Control of Pollution Act 1974 (COPA), or equivalent process at the time if this process has been superseded, will be submitted to the relevant local planning authority for decommissioning activities. Best Practicable Means (BPM) (refer to Table 3-6 Noise and Vibration, Appendix 16E DEMP) will be applied, as far as reasonably practicable, during decommissioning works to minimise noise and vibration at NSRs, including, neighbouring residential properties and other sensitive receptors arising from decommissioning activities.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
REP2-223	Environment - Landscape and Visual		Red Lodge Parish Council considers that the Scheme will erode the rural setting of the settlement and immediately render the two access routes towards Chippenham, Badlingham, Freckenham and Worlington to the west and northwest inaccessible. The visual aspects will transform from an open space to an unsightly and ill-fitting scene of deer fence along some of the paths and bridleways which may result in a claustrophobic sense of confinement.	Red Lodge (LLCA 15) is a nucleated settlement with large areas of recent housing along the eastern side of the busy A11 trunk road. It is located approximately 0.4km to the east of Sunnica East Site B at its closest point. The majority of development within the settlement dates to within 100 years and there has been particularly substantial and rapid expansion in the past 20 years. Figure 5 of the Applicant's technical note on settlement design iteration [**REP2-038**] shows the design evolution of the Scheme in relation to Red Lodge, including scaling back the Scheme boundary to the west, moving it further away from Red Lodge. Solar panel arrays to the west of Red Lodge have been located within the existing pattern of smaller field parcels to reflect the existing landscape pattern and retain the intervening hedgerows and pine lines. New woodland is proposed around the perimeter of the parcels to screen views from Bridge End Road and local PRoW and to reduce the perception of the Scheme from Badlingham, as described in paragraph 10.7.51 of Chapter 10 of the Environmental Statement [**APP-042**]. As described in the OLEMP [**REP3-011**] (paragraph 1.7.6f), a new permissive route adjacent to Elms Road and around the perimeter of E19 and E22 to link with existing routes between Red Lodge and U6006, which will enable enhanced public access for recreation across the landscape. The LVIA concludes that effects on the character of Red Lodge will be neutral [**APP-106**]. No significant effects are predicted with respect to views of residents of Red Lodge, represented by viewpoints 27 and 28 [**APP-107**]. However, the Applicant has noted in its response to the Local Impact Report [**REP3-019**] that some further new housing development has been completed in Red Lodge, introducing new visual receptors with views towards Sunnica East Site B across the A11 trunk road. Effects on these

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				receptors have been assessed as not significant in all assessment scenarios.
REP2-223	Environment - Transport		Roads around Elms Road have issues with slippery and uneven surfaces that Sunnica traffic could exacerbate.	Chapter 7 (paragraph 7.2.14) of the Framework Construction Traffic Management Plan and Travel Plan [**REP3-013**] includes a requirement to undertake conditional surveys before, during and after construction to identify damage caused by the construction of the Scheme, and to remediate such damages. If required, measures will be taken prior to construction to ensure safe passage for vehicles.
			Mud from quarry is an issue. Risk of surface deterioration	The Applicant has committed to wheel washing facilities to prevent mud or material being tracked onto the local highway network as detailed in paragraph 7.2.17 of the Framework Construction Traffic and Management Plan and Travel Plan [**REP3-013**]. Paragraph 7.2.14 of the Framework Construction Traffic Management Plan and Travel Plan [**REP3-013**] includes a requirement to undertake conditional surveys before, during and after construction to identify damage caused by the construction of the scheme, and to remediate such damages. If appropriate, measures will be taken prior to construction to ensure safe passage for vehicles.
			Narrow roads with no footpaths where two vehicles struggle to pass each other. Concern re keeping roads in a safe order.	The Applicant has committed for sections of Elms Road and La Hogue Road to be widened up to 7.2m width. This is set out in the Transportation Technical Note [**REP2-045**] and is included in an update to the Framework Construction Traffic Management Plan and Travel Plan which is submitted at Deadline 3A. This is based on swept path analysis of two HGVs passing one another. The swept path analysis of the two 16.5m articulated HGVs passing one another takes into consideration the passing of wingmirrors, local characteristics such as the verge, vegetation, trees and telephone poles as well as on site observations when identifying the locations of highway works along Elms Road and

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				La Hogue Road. The areas of highway works are identified within the Order limits. Paragraph 7.2.14 of the F-CTMP & TP [**REP3-013**] identifies that the Applicant will undertake highway conditional surveys before, during and after the construction phase to identify any impacts which are a result of the development that need to be remediated. The exact roads are to be agreed with the local highway authorities in advance of construction. Table 13-33 in the Transport and Access chapter of the ES [**APP-045**] details that peak construction period traffic will not result in significant effects for vehicle travellers in terms of driver delay, accidents and safety. In addition, the peak construction traffic will not result in significant effects on Non-Motorised Users (NMUs) in terms of severance, pedestrian delay, pedestrian/cycle amenity, fear and intimidation and accidents and safety. This assessment takes into account the level of pedestrian infrastructure available, notably in terms of the classification of Link Sensitivity.
REP2-223	Environment - Human Health		The Council expresses concern that the scheme will impact public rights of way (PRoW) and the users of these routes, particularly residents and horse riders which will effect local residents' health and wellbeing. Also, post construction, recreational users and riders will be negatively affected by the significant change in visual aspect when travelling along the routes. The Council feels that the safety or visual amenity of horse riders has not been adequately considered.	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, including for horse riders. Accordingly, Chapter 12: Socio-economics of the ES [**APP-044**] also assessed the effects on views and use of PRoWs. The Scheme has been designed to minimise the number and duration of PRoW closures, including along the cable route. If closure of routes is required then, as a worst-case scenario, it has been assumed that the PRoW would be closed for no more than three weeks, and therefore are not considered to have a significant or long term impact. Consequently, Chapter 15: Human Health of the Environmental Statement [**APP-047**] assessed that the Scheme would have a

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				negative health impact during construction. During the operational phase, all routes that were closed during the construction phase will be reopened and the Scheme will provide new permissive routes which will encourage active travel. The Scheme is therefore assessed to have a positive health impact during operation in terms of access to PRoW. The Applicant does note that some routes previously surrounded by agricultural fields will now border the Scheme. This could lead to impacts on the amenity value of these resources to their users, however, the impact is not considered to be sufficient to lead to a reduction in the number of users along the routes due to the transient nature of the use of these.
REP2-223	Environment – BESS- Fire Safety		The size of the BESS (i.e. the more battery cells there are) simply increases the potential for a battery fire. We feel that even a single container battery fire is an unacceptable risk – reports from the Liverpool fire in September 2020 show that it involved a single container, and still had significant consequences (Appendix 3). Clearly, if the fire spreads to more than one container, this would result in a very serious incident close (less than 300m) to peoples' homes. Indicative BESS plans	In recognition of the concerns raised by interested parties the Applicant has updated the outline Battery Fire Safety Management Plan [**REP-032**] and submitted it for Deadline 2. It is considered this provides a detailed plan which ensures that the final design of the BESS will be acceptable and that in the unlikely event of a fire it would be managed safely ensuring the safety of site staff, first responders and the wider community. It also includes indicative layouts for the BESS. Unfortunately, the Liverpool BESS container design was not equipped to the highest safety specifications offered by NEC, which would seem to be a significant oversight considering the close proximity to local residences. The BESS container did not integrate a gas exhaust system for explosion prevention or integrate deflagration panels for explosion protection and was fitted with a fire suppression system discharging NOVEC 1230, which was widely known to be inappropriate for lithium-ion BESS systems. These errors could not be replicated by the Applicant given the requirements of the outline Battery Fire Safety Management Plan.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
			Toxic gas emission concerns	Dispersion modelling undertaken in Appendix 16D models a worst-case scenario, and shows no risk to health or life outside of the application boundary. As stated in the outline Battery Fire Safety Management Plan the BESS system selected for Sunnica will have completed UL 9540A testing which defines and quantifies gas emissions produced during thermal runaway. This data will then be used, if necessary, for specific BESS consequence modelling for the Sunnica site to validate the conclusions of the ES. A key priority of this dispersion modelling is to ensure that respondent exposure to any level of emissions from a BESS thermal runaway incident are minimised and the Emergency Response Plan provides clear alert protocols and safety guidelines.
			Moss Landing, Monterey, California Tesla Megapack fire in September 2022. Residents were instructed to shut all windows and turn off ventilation systems due to the risks of smoke inhalation exacerbated by the emission of hazardous materials from the lithium-ion battery fires. The County Office advised that smoke may still occur in the area for several days despite the fire being fully controlled. The nearest residential area in Moss Landing of just 50 houses is located just over 1200 meters from the BESS, the same distance as the two schools in Red Lodge - once again it must be stressed that this incident involved one battery unit and such incidents are becoming increasingly common, raising the question if residents and their children should be subjected to such a real potential; risk.	The Applicant's BESS fire safety team has studied global BESS incident reports to help inform red flags for the Sunnica BESS design template and to establish key safety protocols to inform drafting of Emergency Response Planning (ERP) documentation at the detailed design stage. It should be noted that the Tesla Megapack is designed to fully combust (burn out) within 6-8 hours of a thermal runaway event, which is a deliberate safety feature to allow for quicker and safer replacement of the BESS unit. A suppression system is not integrated into the design. Dispersion modelling undertaken in Appendix 16D models a worst-case scenario and shows no risk to health or life outside of the application boundary. As stated in the outline Battery Fire Safety Management Plan the BESS system selected for Sunnica will have completed UL 9540A testing which defines and quantifies gas emissions produced during thermal runaway. This data will then be used, if necessary, for specific BESS consequence modelling for the Sunnica site to validate the conclusions of the ES. A key priority of this dispersion modelling is to ensure that respondent exposure to any level of emissions from a BESS thermal

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				runaway incident are minimised and the Emergency Response Plan provides clear alert protocols and safety guidelines
REP2-223	Environment – BESS		There is a real concern throughout the village over the placement of the sizeable BESS and its associated substation so close to the village. Red Lodge Parish Council does not consider the close proximity to our residents (less than 300m from the Travelers site on Elms Rd, 600m from a new estate and 1200m from two sizeable schools) to be adequate. The concerns include potential noise impact. Red Lodge Parish Council believe that electricity management systems usually create noise (hum, buzz) and there is little information about the noise levels from the BESS or substations on Elms Road Especially since Sunnica's latest changes in scheme included the addition of a shunt reactor, which Sunnica have said will be noisier but have not, to the best of our knowledge, provided adequate assessments to ascertain the impact of these noise disturbances. The visual and noise impacts of the BESS are likely to be significant. BESS fire could release highly toxic gases. Modelling of gas emissions has been limited to only one toxic gas (Hydrogen Fluoride) and not for other gases that may evolve from the different cell types that Sunnica are proposing to use. Red Lodge Parish Council also has specific concerns about the lack of regard that Sunnica have paid to our fixed site travellers community on Elms Rd and the largest of the BESS and substation compounds less than 300m from their property.	The Statement of Need [**APP-260**] provides a robust explanation of the scale of the BESS in Sections 10 and 11. Key parts of this statement are enclosed below. There are three BESS Compounds, with maximum footprints of the compounds being up to: • Work No. 2A (Sunnica East Site A): 66,000 m^2. • Work No. 2B (Sunnica East Site B): 162,000m^2. • Work No. 2C (Sunnica West Site A): 83,000m^2. The Applicant considers the scale of BESS is reasonable relative to the amount of solar PV. Paragraph 10.4.29 notes that the proposal to include BESS as part of the Scheme is "…in accordance with emerging government policy on the need for integration measures on the electricity system to support the transition to a fully low-carbon grid. The grant of a consent for BESS at Sunnica would therefore allow the project to fulfil its ambitions in providing full support to UK action plans to deliver decarbonisation." The ES has considered the potential effects of the BESS on sensitive receptors. Proximity to Red Lodge residents (less than 300m from the Travellers site on Elms Rd, 600m from a new estate and 1200m from two sizeable schools) is considered adequate for well designed BESS. Fire risks are discussed above. In terms of environmental impacts, it is noted that Red Lodge PC has raised specific concerns over noise and landscape and these are discussed further below. The BESS should not emit any liquids or gases in routine operation, but does emit noise when the fans are operating. The substation will emit a hum-like noise. The BESS and substation have been carefully located with respect to distance to receptors

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				for noise and this has been assessed in Chapter 11: Noise and Vibration [**APP-043**]. This concludes that noise during operation of the project will be negligible at most residential receptors, with up to two receptors potentially experiencing minor adverse noise, which is still not considered significant. This is based on worst case assumptions in the assessment, such as assuming maximum sound power levels and that the BESS will be operating at this level every second of the day, all year, which observations at existing BESS suggests is highly unlikely. In terms of noise from the shunt reaction in Option 3, the Change Application [**AS-243**] states that changes in noise as a result of Option 3 would result in an increase in noise from combined solar infrastructure plant and the substation and battery storage areas of no greater than 2 decibels (dB) at affected receptors (R5, R6, R8, R9, R10, R11). This difference in noise is not perceptible to the average human ear and would result in absolute noise levels that are no worse than a low impact. Consequently, the new infrastructure associated with Option 3 would not result in additional significant noise effects. Further information on the environmental assessment can be found in Chapter 5 of the Change Application Report [**AS-243**]. During unplanned, non-routine events, the BESS can also generate some atmospheric emissions. This has been assessed in the Unplanned Atmospheric Emissions from Battery Energy Storage Systems (BESS) [**REP2-064**]. This concludes that in a fire event, safe levels (AEGL-1 values) are generally achieved within the Order limits, or where this is not the case, within a shorter distance than any sensitive receptors. No health criteria are therefore expected to be exceeded at sensitive receptors during a fire event, including the traveller site. The report also concluded that the risk of a fire is unlikely, given the controls proposed in the Outline Battery Safety Management Plan [**REP2-032**]. The modelling has been based on HF because – as paragraph 2.1.8 notes - only emissions of hydrogen fluoride are

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				likely to occur at concentrations that may pose a hazard to health at off-site receptor locations. Emissions of other substances such as methane, chlorine and carbon monoxide are not considered further, as they are unlikely to be emitted at measurable concentrations and therefore could not cause elevated concentrations at any receptor location. Chapter 10 Landscape and Visual Amenity of the ES [**APP-042**] provides an assessment of impacts of the project on landscape and visual amenity. BESS is specifically mentioned as described below. Paragraph 10.7.4 of the Landscape and Visual assessment explains design principles have been incorporated across the Sunnica East Sites A and B by: • Siting the BESS in E33 adjacent to reservoirs and Lee Farm, so that its massing and land uses are perceived in the context of existing infrastructure features and built structures in the landscape. • Siting the BESS in E18 so that it is enclosed and screened by existing woodland along its northern edges and in part by roadside vegetation adjacent to Elms Road to its south-east. • The tonal rendering of shades which are suitable to integrate within the landscape will help reduce the perceived overall mass of these structures, secured via the OEMP [**REP2-030**]. The Landscape and Visual assessment does not identify any significant landscape or visual effects associated with BESS. Effects are summarised as follows: • There will be some changes in landscape and visual effects during construction associated with clearance and works for the BESS.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				• For Year 1 of operation, paragraph 10.8.194 identifies there would be middle distance views of the upper parts of the BESS in Sunnica East Site A for recreational users along part of the River Lark, motorists on East Fen Road, and residents in East End. Paragraph 10.8.195 identifies the upper parts of the BESS in E33 would be visible at close range for motorists travelling along Ferry Lane. The massing of the BESS would be softened by their tonal rending, but the structures would represent a noticeable change in the composition of views in Year 1. • For Year 1, the upper parts of the BESS would be visible to the north of the Elms in Sunnica East Site B • In Year 15, paragraph 10.8.320 notes that the new tree planting would have established along the eastern edges of E02, E04, E08, E10 and E33, to reinforce the existing pattern of roadside vegetation and increase the enclosure of the BESS in E33 and reduce their perception from the wider landscape. • The visibility of the upper parts of the BESS and solar stations in E01 to E05 would be substantially reduced by the establishment of the proposed planting around the edge of E05 and adjacent to E01 by Year 15, in relation to views from recreational users along the River Lark and motorists on East Fen Road and Sheldrick's Road for Sunnica East Site A. Views would also be screened in relation to views from motorists travelling along Ferry Lane, by the establishment of the proposed trees above the roadside hedgerow. The fixed site travellers community has not been specified in all reports and chapters, but the design measures and additional mitigation are considered adequate to avoid significant effects at this location.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
REP2-223	Environment – General ES		Red Lodge Parish Council feel the decommissioning plans fall short of any guarantee that monies will be available to clear up and return the land to its current agricultural use. Furthermore, there are no guarantees that the spent solar panels can be recycled in the future. When considering the amount of construction needed to anchor down one solar panel so that it can withstand high winds, then consideration must be given to the amount of construction material associated with around 1 million solar panels (estimate provided by Sunnica during consultation), it cannot be concluded that there is any easy way of re-commissioning the fields to their present agricultural use again. Red Lodge Parish Council believe that future generations could still be driving through a wasteland of metal and concrete in 50 years' time and believe the current outline for decommissioning and the lack of funding to do this, is unacceptable. Red Lodge Parish Council believe that Sunnica should have a far more robust decommissioning plan and a process by where they can guarantee monies are ring fenced for the clear up and re-instatement of the land.	As outline in Section 3.9 of Chapter 3: Scheme Description **[REP2-022]** the Scheme will be required to be decommissioned after 40 years of operation. For the purposes of the ES, decommissioning is assumed to begin no earlier than 2065, although some parts of the Scheme may be decommissioned earlier if the landowner requires it. Decommissioning is expected to take between 12 and 24 months and will be undertaken in phases. Each of the technical chapters within the ES **[APP-038** to **APP-047]** has considered the potential effects of the Scheme during decommissioning. A Framework Decommissioning Environmental Management Plan (DEMP) has been prepared (Appendix 16E of this Environmental Statement **[REP2-028]**) and submitted with the Application. The DEMP which is secured through Requirement 22 of the Draft DCO **[REP2-012]** outlines the how the mitigation measures, including waste management, re-instating the field to their previous agricultural use, identified within the ES will be implemented. It also sets out the monitoring and auditing activities designed to ensure that such mitigation measures are carried out, and that they are effective.

2.16 REP2-240 Say No To Sunnica Action Group Ltd

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
REP2-240	**Need**	1.1.8	Reliance should not be placed upon Draft Revised National Policy Statements	The Applicant is of the opinion that the Draft Overarching National Policy Statement for Energy EN-1 and EN-3 (2021) are an important and relevant matter for the Secretary of State in the decision-making process. The weight to be attributed to the draft NPSs is set out in more detail in the Planning Statement at paragraphs 5.3.4 – 5.3.7 **[APP-262]**: The Government has determined that the NPSs should be reviewed and in its December 2020 Energy White Paper signalled a review of the existing National Policy Statements, issuing draft versions of NPS EN-1 and NPS EN-3 for consultation on 6th September 2021. While the draft NPS EN-1 confirms that the *"Secretary of State has decided that for any application accepted for examination before designation of the 2021 amendments, the 2011 suite of NPSs should have effect in accordance with the terms of those NPS."* (Para 1.6.2) the same document also states that *"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"* (Para 1.6.3). The Secretary of State has treated the draft NPSs as important and relevant considerations in determining previous applications for development consent orders.
REP2-240	**Need**	2.1.1	Comparison of size and scale with existing operational sites in the UK	Paragraph 1.1.2 of the Statement of Need **[APP-260]** states that "*The NPS for renewable energy infrastructure covers those technologies which, at the time of publication in 2011, were technically viable at generation capacities of over 50MW onshore and 100MW offshore. Critically, solar is not included within the scope of the current NPS as at that time it was not proven at scale. However … the Scheme should be considered in the light of [the] change [in] proven ability of solar to deliver and contribute at scale*." The granting of consent for Cleve Hill Solar Park in May 2020 marked the first >100MW solar site in the UK. Little Crow was the second >100MW (although not as large as Cleve Hill) solar park to be consented in the UK. The Planning Inspectorate's National Infrastructure Planning portal currently lists at least 12 other solar developments of >50MW installed, and National Grid's TEC register

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				confirms that many of these proposed developments are likely to be of a very similar scale to Sunnica. Paragraphs 9.2.5 and 9.2.9 of the Statement of Need explains the factors which are driving development of larger scale solar, including technological advances in solar panel technology, economies of scale in supply chains, and improved delivery processes. It is therefore understandable that solar schemes are getting larger in the UK, and Sunnica is one step in that development. Section 6.1 of the Statement of Need describes the scale of low-carbon generation projected by National Grid ESO which is required to come forwards in order to meet Net Zero. Para 6.1.9 of the Statement of Need states that National Grid ESO's projections include solar capacities in 2030 of 25 – 40GW, in 2040 of 43 – 68GW, and in 2050 of 57 – 89GW. These projections were made in July 2021 and were revised upwards in July 2022 by National Grid ESO in their 2022 Future Energy Scenarios publication. At the time of submission of this Written Response, c.14.5GW of solar is operational in the UK. Large capacities of solar generation are required to remain on track with National Grid's projections. Section 7.5 of the Statement of Need describes how both large and small scale solar developments are important to meeting that need, and that small developments alone will not be sufficient. The scale proposed at Sunnica is needed to meet the UK's Net-Zero ambitions.
REP2-240	**Need**	2.1.4	Objection to the nature of separate parcels of land connected together to form the scheme as opposed to one single site.	The development of the Scheme layout is described in the Design and Access Statement [**APP-264**] and section 4.7 of Chapter 4 of the Environmental Statement [**APP-036**]. These documents explain how the design has evolved including in response to planning policy and stakeholder feedback. The Applicant does not consider there is any in-principle objection to the Scheme layout.
REP2-240	**Need**	5.1.24 - 5.1.27	Use of surrounding land as feedstock for Bay Farm AD	As per the paragraph 4.1.21 – 4.1.28 of the Applicant's Written Summary of Sunnica Limited's Oral Submissions at Development Consent Order Issue Specific Hearing on 1 November 2022 [**REP2-036**], there is no conflict between the Scheme and the planning permission for the AD Plant at Worlington.
REP2-240	**Need**	12.1.13 -	Incomplete citation from the British Energy Security Strategy	SNTS states in para 1.2.13 that the policy considerations which indicate in favour of the construction of BESS in the UK does not provide justification for the co-location of BESS with solar. SNTS goes on in paragraph 12.1.14 to cite

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		12.1.14		the British Energy Security Strategy's position – which the Applicant accepts – to make effective use of land. The British Energy Security Strategy however then goes on to say that government "Will also support solar that is co-located with other functions (e.g. agriculture, onshore wind generation, or storage) to maximise the efficiency of land use". Chapter 10 of the Statement of Need [**APP-260**] describes the benefits of co-located solar and storage, and Appendix B Sunnica Energy Farm: Battery Energy Storage System of the response to the Applicant's Response to the First Written Questions [**REP2-038**] sets out the Applicant's case in favour of Battery Energy Storage Systems being Associated Development to the solar PV panels.
REP2-240	**Need**	12.1.28 - 12.1.30	SNTS make the case against the scheme due to a need for food security to be enhanced.	The Applicant submitted its position on food security in its response to the Examining Authority's letter of 28 July 2022 [**PDB-001**]. It is not accepted that food security is an important issue for the examination for the reasons set out in that submission. Further, The Applicant believes that the total area of land required to be put to solar in order for solar to meet its share of national Grid's projections of need by 2050 represents less than 1% of the total pastures and non-irrigated arable land in the UK. Large-scale solar farms are more likely to be sited in more rural, rather than more developed, areas – simply because this is where land that meets the basis screening criteria (irradiation, land and grid availability) is more likely to be available. National Grid's FES (2022) projects the need for between 57 and 92GW of UK solar deployment by 2050. Draft NPS EN-3 includes an anticipated range of 2 to 4 acres for each MW of output generally required for a solar farm along with its associated infrastructure (and Sunnica is within that range). Using the most conservative value from the range, and assuming that all future solar capacity deployment is large-scale rather than micro-scale (another conservative assumption) implies that a further 167,000 to 300,000 acres of land (approximately 70,000 to 125,000 hectares) would need to be set aside for solar capacity by 2050 in order to achieve the FES projections. This represents at a maximum, 0.5% of total UK land area, or between 0.5% and 0.9% of the total pastures and non-irrigated arable land in the UK.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
REP2-240	**Need**	13.1.16	The proposed power rating and sizing of the BESS	In Para 13.1.16, SNTS state that Mr Dickinson concludes on a power rating of the BESS of 1,555MW, and make a further judgement that the capacity figure associated with the proposed BESS is 3,110MWh. These assumptions are incorrect. The Applicant's Response to the First Written Questions – Appendix B [**APP-038**], which was published after SNTS's Written Representation provides additional information and context around the size of the proposed BESS as Associated Development to the Solar PV development, this is included at Para 23 of the Response document.
REP2-240	**Need**	13.1.18 - 13.1.27	The uses of BESS	SNTS draw a number of conclusions in Para 13.1.18 - 13.1.27 relating to the role and function of the BESS at Sunnica and that the scale of the BESS is out of proportion to the PV solar farm. It is likely that this argument is made to suggest that the BESS is not to be considered Associated Development. It is possible that SNTS had in mind a 1,555MW storage system when the Representation was drafted, however the previous comment confirms the Applicant's position that this is not correct. Large (>50MW) battery storage sites are now coming forwards because, in Summer 2020, BEIS moved to ease planning restrictions for utility-scale batteries, permitting cells over 50MW in England to be consented through TCPA rather than NSIP regimes. The decision was taken in recognition of the battery sector's role in the net-zero transition. The Applicant believes that it is more appropriate to compare the scale of the BESS proposed at Sunnica, with the scale of BESS currently in the pipeline to be developed, as opposed to against those BESS which are currently operational and which were consented under a different consenting regime. For example, Harmony Energy and Fotowatio Renewable Ventures (99MW / 198MWh) BESS started commercial operation in November 2022. Another 100MW project is currently under construction by Zenobe (at Capenhurst). Many more, larger, projects are in planning or at other stages of project development. For example Scottish Green Battery Complex (800MW / 1.6GWh, operational in April 2024) and Sembcorp 360MW storage (Teesside). Cleve Hill Solar Park, which received its DCO in May 2020, has consent for 350MW of battery storage capacity co-located with its solar PV development.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				Many (but not all) other large scale solar sites are coming forwards with co-located batteries. The Applicant's Response to the First Written Questions – Appendix B [**REP2-038**] provides additional information in support of the Applicant's position that the BESS is Associated Development to the Solar PV development. In Para 13.1.22 SNTS express their view that the Statement of Need [**APP-260**] makes the case for electrical storage generally but has limited comment on the connection of BESS with solar generation. Para 2.3.1 of the Statement of Need cites the Climate Change Committee's view that "More rapid electrification must be accompanied with greater build rates of low-carbon generation capacity, accompanied by measures to enhance the flexibility of the electricity system to accommodate high proportions of inflexible generation". Chapter 10 of the Statement of Need cites the National Infrastructure Commission who write that "It is key that, alongside deploying renewables, the UK continues to drive innovation in the power sector to effectively build a flexible electricity system. Storage technologies, flexible demand, efficient interconnectors, and other innovations are also needed to support renewables and maintain the security of the electricity system" Section 10.1 of the Statement of Need goes on to provide more detail, and the Applicant concludes from this evidence that BESS is needed because of an increase in solar and other renewable generation onto our energy system. In Para 13.1.23 SNTS describe the development of standalone BESS across the country which are not subordinated to the main purpose of the scheme: electrical generation. The Applicant would point to the expert opinions referred to in the Statement of Need above, and would respectfully disagree: the development of BESS in Great Britain (and broader) is entirely subordinate to the main purpose of the generation of electricity from renewable sources. The policy definition of Associated Development includes infrastructure which is associated with the Principal Development (through the 5 associated development principles contained within the Planning Act 2008: Guidance on associated development applications for major infrastructure projects (GADA)). These principles do not exclude from Associated Development infrastructure which *could* be developed elsewhere, or also provide additional benefits which are not directly related to the development of the principal development. This

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				appears to be the primary argument made by SNTS in their Written Representation. In their Paras 13.1.24 - 13.1.25 SNTS discuss the role of the BESS to store curtailed power (I.e. where the PV panels generate more power than the grid connection can transmit) and describe this as an exceptional event. Co-located BESS at Sunnica will be able to store energy which is generated at Sunnica, but not needed at that time, whether the solar PV panels are generating at 100% power or 1% power. If the national supply of renewable energy is greater than the national demand for energy at that time (example: a windy, sunny, mild Sunday summer afternoon when electricity demand is low), the BESS at Sunnica can store that energy and export it later when it is needed. Without the capability to store energy at Sunnica, that generation may be lost. In summary, there are many more (and more frequently occurring) scenarios in which the BESS may store power from the solar panels than described in Paras 13.1.24 - 13.1.25 Regarding Statement of Need Table 10-1, the Applicant acknowledges the comments made by SNTS on the contents of this table, but wishes to clarify that the Applicant's position on Associated Development is set out in The Applicant's Response to the First Written Questions – Appendix B [**APP-038**]. Responses to SNTS's comments on the table in question are set out in the following response.
REP2-240	**Need**	13.1.52	SNTS comments on Statement of Need Table 10-1.	The Applicant recognises that stand alone solar, and stand alone BESS, both are already (and will in all probability continue to be) in operation in the UK. The Applicant's position on Associated Development is set out in The Applicant's Response to the First Written Questions – Appendix B [**APP-038**]. SNTS also appear to make their comments with a significantly oversized BESS in mind (vis-a-vis their Para 13.1.16). This has the effect of misrepresenting the interplay between the BESS and the solar scheme. The Applicant's Response to the First Written Questions – Appendix B [**APP-038**] sets out at Para 21 – 23 evidence which demonstrates that the BESS is proportionate to the nature and scale of the principal development (and will not have a 1,555MW power rating). The Applicant would make the following comments in response to SNTS' comments on Table 10-1 of the Statement of Need [**APP-260**].

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				Trading is a financial transaction which balances supply and demand on a national level, ahead of delivery. Trading supports economic efficiency at delivery by minimising "balancing actions" taken by National Grid *at* delivery, to balance supply and demand. Trading is a necessary part of the efficient functioning of the GB electricity market. BESS at Sunnica would support the operation of the principal solar development (a key AD principle) and increase the development's participation in traded markets, so improving for all participants and consumers, the economic efficiency of the market at delivery. **Balancing Mechanism ("BM")**: The BM is National Grid's last-stop market for flexibility at delivery. The Applicant's Response to the First Written Questions – Appendix B [**APP-038**] describes in more detail relevant capacity assumptions for the BESS in relation to the anticipated size of the solar development. As explained above, BESS at Sunnica would support the operation of the principal solar development and increase the development's participation in traded markets. **Frequency Response, Reserve Operation, Reactive Power, Inertia**: The Applicant's Response to the First Written Questions – Appendix B [**APP-038**] describes at Paras 12-16 why new assets must come forward to provide services to the grid, because new renewable generation is displacing thermal assets from the grid. Regardless, these services are necessary for the safe, secure and efficient functioning of the national grid, and BESS at Sunnica would therefore help address its impacts through its capacity and capability to provide those services. **Black Start and Constraint Management**: Because it is possible to configure a BESS to be charged by a co-located solar facility, even when not connected to the national grid, a co-located facility is more likely than either standalone constituent part to be able to provide robust Black Start services to the National Grid. An analogous argument holds for constraint management services. **Infrastructure Costs**: Both solar and battery storage systems will need to connect to the national electricity transmission system. Suitable points of connection for such assets are not limitless, and ultimately the costs associated with constructing new connections feeds (either directly or indirectly) into consumer bills. Therefore, where a single point of connection can facilitate the co-location of BESS and solar, then less additional infrastructure will be

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				required to connect the same capacity if the point of connection was not shared. In this way, infrastructure costs are reduced by co-located assets.
REP2-240	**Need**	14.1.8 – 14.1.11	Planning justification for BESS	The Applicant's Response to the First Written Questions – Appendix B [**APP-038**] sets out The Applicant's argument for classification of BESS at Sunnica as AD. In particular Para 21 – 23 provides evidence which demonstrates that the BESS is proportionate to the nature and scale of the principal development and provides further information on a reasonable estimate of installed energy and power capacity in order to retain proportionality.
REP2-240	Carbon Benefit	12.1.22 - 12.1.27	Incorrect baseline assessment	Please refer to Appendix A for the Applicant's response to the Cranfield University Response.
REP2-240	**Consultation**	17.1.1	Many of the flaws in the scheme (avoidable or otherwise) would have been identified at an earlier stage if the applicant had engaged in proper consultation with locals. As locals have been deprived of that proper consultation, the applicant (and, ultimately, the ExA) have been deprived of the fruits of a proper and successful consultation.	The Applicant disagrees with this assessment. 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. The Applicant has had regard to the pre-application consultation responses received in the Consultation Report [**APP-026**] and the Consultation Report appendices J-1 to J-5 [**APP-030**]. The Planning Inspectorate found that the Applicant had complied with its pre application consultation requirements when it accepted the Application for Examination.
REP2-240	**Consultation**	17.1.4	SNTS take the view that the poor approach to consultation in total has led to a position where locals could not give proper and intelligible replies to the consultation. At the very least, this has deprived the applicant of quality responses	The Applicant does not agree. The Applicant received a large volume of replies through both its non-statutory and subsequent statutory consultations. In having regard to these responses, the Applicant made a number of changes to the Scheme design including: • Removing areas bordering the south of Worlington from solar development. This has increased the distance between the solar sites and homes.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
			which would have assisted it in avoiding the harms of the scheme (and, where appropriate introducing appropriate mitigation).	• 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 considers that the Environmental Statement gives a robust assessment of environmental impacts and proposes appropriate mitigation. As noted within the Environmental Statement, the Applicant had regard to feedback received through the pre-application consultation in developing the ES.
REP2-240	**Consultation**	17.1.6	Included as appendixes to these Written Representations are papers produced by SNTS commenting on the quality of the statutory consultation Annex G and the consultation undertaken on the additional option for connecting to the substation at Burwell in Appendix L. As the ExA will see on an examination of these papers, both consultations undertaken as part of advancing this application have been flawed. The flaws have both concerned the people who have been consulted, and the	The Applicant considers its pre-application consultation to have been adequate and refers the reader to the response given to the issue raised by SNTS at 17.1.1 outlined above. The Applicant considers the non-statutory consultation carried out in advance of the submission of its Changes Application [AS-243] to have been appropriate. Details of the consultation and the responses received are given in the Changes Application and in Appendix O [**AS-275**].

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
			quality of that consultation. SNTS are of the view that engagement with the application, and the quality of the replies, have been significantly hampered by the difficulties that locals have faced in making their views known.	
REP2-240	**Consultation**	17.1.8	Emerging Government policy is towards community involvement in the planning of renewable energy schemes to ensure local acceptance. The flawed consultation deprived local people of being able to meaningfully contribute.	The Applicant considers its pre-application consultation to have been adequate and refers the reader to the response given to the issue raised by SNTS at 17.1.1 outlined above. It is not Government policy, or indeed is it in the draft NPS, for communities to be involved in schemes. As noted above in response to paragraph 17.1.4, the community consultation carried out prior to the submission of the DCO application resulted in a number of changes to the Scheme design 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. The Planning Inspectorate found that the Applicant had complied with its pre-application consultation requirements when it accepted the Application for Examination.

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REP2-240	**Design**	2.1.2 3.1.9	The size and shape of the development comprising four Sites render the Scheme a poor design that is not sustainable, not sensitive to place and causes disproportionate harm to the location and local communities.	The size and shape of the Scheme is necessary in order to deliver the scale of renewable energy generation benefit that the Scheme will provide. Further detail is provided in the Statement of Need [**APP-260**]. The design of the Scheme has been shaped by detailed studies of the character of the landscape and settlements and engagement with stakeholders including through community consultation. As a result of the design approach taken by the Applicant, the design of the Scheme incorporates offsets from solar farm structures to settlement edges, existing vegetation, including hedgerows, public rights of way and road networks. The design of the Scheme also conserves field patterns, ecology and historical features (including below ground archaeology) across the Order limits, including pine lines. This approach preserves the sense of identity of the landscape. The Design and Access Statement [**APP-264**] describes how the Applicant's approach to the development of the design of the Scheme has been sensitive to place and local character. The Applicant has prepared a Technical Note on Settlement Design Iteration as Appendix A to the Applicant's Response to the First Written Questions [**REP2-038**]. This explains in more detail how the Scheme has been refined through the design development process so as to be sympathetic to its setting and communities. The lifecycle greenhouse gas 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. This shows that the Scheme would result in a substantial saving in lifetime carbon emissions compared with the projected grid energy mix.
REP2-240	**Planning**	23.1.1 – 23.1.6	Planning Balance	Section 23 of **REP2-240** includes numerous incorrect and/or unsubstantiated assertions. These are discussed in other sections of the Applicant's response to **REP2-240**, and briefly addressed below. • Intrinsic cumulative impact: The Applicant has included an assessment of effect interactions (or intra-project cumulative effects) of the four sites

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				and grid connection route of the Scheme within each of the technical chapters (6 to 16) of the Environmental Statement [**APP-038** to **APP-048**]. • Landscape and visual amenity: ES Chapter 10, Landscape and Visual Amenity [**APP-042**] assesses the impact of the Scheme on landscape and visual amenity. It includes assessment of landscape character at regional, county, neighbourhood, local and site level. • Agriculture: **REP2-240** is incorrect in its assertion that at least 50% of the land is 'best and most versatile' (BMV). An assessment of the agricultural land classification of the Scheme is set out by the Agricultural Baseline Report [**APP-115**]. This identifies that 96% of the land within the Sites is poorer quality agricultural land, being (grades 3b, 4 and 5). 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. • Ecology and Biodiversity: The assertion in **REP2-240** that the Scheme would result in a net loss in biodiversity is incorrect. 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 technical note will be produced and issued during the Examination process providing the detail for the calculations using the latest BNG metric 3.1. • Impact on the Horseracing industry: A Horseracing Industry Impact Assessment [**REP2-039**] has been submitted by the Applicant. This concludes that there is no evidence that the horseracing industry will be impacted detrimentally in its operations or longer term viability.

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				• Impact on Local Communities: The Applicant's ES assesses the significant impacts of the Scheme. • Impact on Recreation: The Scheme will not affect the ability for recreational open areas to be used. Impacts on users of public rights of way (PRoW) have been considered by the Applicant. There are eight PRoWs which may require temporarily closure for a short-term period during the construction phase. Any such closures are expected to be for a maximum of three weeks which is expected to be a worst-case scenario. Each short-term temporary closure of the PRoWs would 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**]. 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. • Impact on Tourism: The Horseracing Industry Impact Assessment [**REP2-039**] concludes that the evidence indicates that it is highly unlikely that people visiting Newmarket, primarily to see horses race and train, would be deterred from visiting due to a nearby solar farm. • Carbon Lifecycle and Need: As per the SoS's decision letter for Little Crow Solar Park, substantial positive weight should be afforded to a project due to the contribution it will make towards the decarbonisation of energy production. • BESS, Planning and Safety: In the event that a hazardous substances consent is required following completion of detailed design, the Applicant will apply for this consent at that time. The relevant hazardous substances authorities for such an application would be the council(s) of the district in which the BESS is to be located.

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				• Decommissioning: Decommissioning of the authorised development will be undertaken pursuant to the approved Decommissioning Environmental Management Plan (DEMP) that must be approved prior to decommissioning under requirement 22 of the draft DCO. The DEMP must be substantially in accordance with the Framework Decommissioning Environmental Management Plan that has been submitted with the DCO Application in Appendix 16E of the Environmental Statement [**APP-125**]. Once decommissioning is complete, the land will be returned to the landowner pursuant to the terms of the respective Leases (which will then end). At that point, the Applicant will have no control over the land, but the land will be in a condition (except for areas for landscape and ecological mitigation) that can be returned to agriculture by its freehold owner. • Assessment of Alternatives: The purpose of Applicant's site selection process and the information presented by ES Chapter 4, Alternatives and Design Evolution [**APP-036**] and ES Appendix 4A, Alternative Sites Assessment [**APP-054**] was to identify a suitable site for the Scheme and to explain the options considered and the reasons for the Applicant's decision. NPS EN-1 and draft NPS EN-1 both set out that there is no policy requirement for the Applicant to demonstrate that it has selected the 'best' site, the least impactful site or that alternative sites would/could not also be suitable. Should other reasonable alternative sites exist, this should not weigh against granting Development Consent for the Scheme. • Consultation: The Scheme has been developed following and taking account of statutory and non-statutory consultation, as described by the Consultation Report [**APP-026**]. The consultation has been found to be adequate and the Scheme has been accepted for examination. • Justification for Compulsory Purchase: The Applicant has prepared a Statement of Reasons [**APP-022**] to explain the reasons that compulsory purchase powers are sought.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				• Traffic: Chapter 13, Transport and Access of the ES [**APP-045**] considers the impact of the Scheme on traffic and transport. The Planning Statement sets out the Applicant's consideration of the planning balance in respect of the Scheme in sections 6 and 7 of the Planning Statement [**APP-261**]. The following sets out and summarises the conclusion of that document. The Energy NPSs, Draft Energy NPSs, and other national energy policy sets out the government's aims to provide secure and affordable energy supplies whilst decarbonising the energy system. This is in order to enable the UK to achieve its legally binding commitment to reduce carbon emissions and achieve net zero carbon emissions by 2050; as well as provide a resilient and low cost energy network for the future. The Government recognises in policy that the need to deliver these aims and commitments is immediate and therefore renewable energy NSIPs, including large scale solar projects, need to be delivered urgently. The Scheme will deliver these policy aims, providing a significant amount of low carbon electricity over its lifetime; and providing resilience, security and affordability of supplies due to its large scale and proposed integration of BESS. It will therefore be a critical part of the national portfolio of renewable energy generation that is required to decarbonise its energy supply quickly whilst providing security and affordability to the energy supply. It is clear that there is a compelling case for the need for the Scheme and that it will deliver national economic and social benefits in line with the government's wider objectives of delivering sustainable development. The analysis of planning policy compliance demonstrates that the need for the Scheme is supported by planning policy and other national energy and environmental policy and that the Scheme addresses relevant national and local planning policies through its design, avoiding sensitive areas and limiting adverse impacts where possible. With the mitigation proposed, the ES demonstrates that the Scheme will not have any significant adverse effects in relation to designated landscapes, biodiversity sites or protected species or habitats; flood risk and water quality;

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				transport networks; access; noise and vibration; soils; air quality and land uses. It is however acknowledged that the Scheme will result in residual significant adverse effects upon landscape and visual receptors and heritage assets. 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. The analysis of the Scheme's compliance with the relevant national planning policy heritage tests identifies that residual significant adverse effects are expected upon three designated heritage assets; two scheduled monuments and one grade II registered park and garden; during the stages of the Scheme's lifetime. The impacts on these assets have been determined to have less than substantial harm. This less than substantial harm is to the setting of these assets with no direct adverse physical impacts resulting from the Scheme. There will also be no permanent loss of the significance of these designated assets allowing future generations to retain an understanding of their settings because the Scheme is proposed to be operational for 40 years, with its decommissioning secured through a DCO requirement. The proposed mitigation strategy minimises the harm to their settings and the Scheme provides a benefit to one scheduled monument by removing it from agricultural use and therefore potential future plough damage. The time limited and reversible loss of significance to the setting of a small number of designated assets is therefore considered to be justified and outweighed by the benefits of the Scheme. Mitigation for residual significant adverse effects upon below ground archaeology is to be implemented where possible by firstly avoidance of these areas in the detailed design process and then a programme of fieldwork and recording where necessary. Whilst it has not been possible to avoid all impacts these have been minimised, where possible, through careful design and detailed mitigation strategies. When

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				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.
REP2-240	**Alternatives**	16.1.1 – 16.1.2	Introduction	The purpose of Applicant's site selection process and the information presented by ES Chapter 4, Alternatives and Design Evolution [**APP-036**] and ES Appendix 4A, Alternative Sites Assessment [**APP-054**] was to identify a suitable site for the Scheme and to explain the options considered and the reasons for the Applicant's decision, as per the requirements of NPS EN-1 and of Schedule 4(2) of the Infrastructure Planning (Environmental Impact Assessment Regulations) 2017 (the EIA Regulations). These state, respectively: Paragraph 4.4.2 of NPS EN-1: *"applicants are obliged to include in their ES, as a matter of fact, information about the main alternatives they have studied. This should include an indication of the main reasons for the applicant's choice, taking into account the environmental, social and economic effects and including, where relevant, technical and commercial feasibility"*. Schedule 4(2) of the EIA Regulations: *"A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects."* The Planning Inspectorate's (PINS) Advice Note 7 also sets out that PINS considers that a good ES is one that, amongst other things: *"explains the reasonable alternatives considered and the reasons for the chosen option taking into account the effects of the Proposed Development on the environment"*.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				The above require only for the Applicant's reasons for selection of the site to be described (as a matter of fact). NPS EN-1 and draft NPS EN-1 both set out that there is no policy requirement for the Applicant to demonstrate that it has selected the 'best' site, the least impactful site or that alternative sites would/could not also be suitable. Should other reasonable alternative sites exist, this should not weigh against granting Development Consent for the Scheme. NPS EN-1 states at paragraph 4.4.3 that: *"…where (as in the case of renewables) legislation imposes a specific quantitative target for particular technologies or (as in the case of nuclear) there is reason to suppose that the number of sites suitable for deployment of a technology on the scale and within the period of time envisaged by the relevant NPSs is constrained, the IPC should not reject an application for development on one site simply because fewer adverse impacts would result from developing similar infrastructure on another suitable site"* Paragraph 4.2.13 of Draft NPS EN-1 states that the presence of a lower impact alternative site would not be a reason to refuse Development Consent, stating: *"the SoS should not refuse an application for development on one site simply because fewer adverse impacts would result from developing similar infrastructure on another suitable site."*
REP2-240	**Alternatives**	16.1.3 – 16.1.18	*The Sunnica scheme is an unusual and exceptional case. As proposed, it is the largest solar farm in the UK (and, indeed, one of the largest in Europe). It is also of an unusual design using connected islands throughout the landscape. This sets it apart from the Little Crow and Cleve Hill schemes which sit as one broadly self-contained scheme in the landscape.*	Paragraphs 4.4.1 and 4.4.2 of NPS EN-1 and paragraph 4.2.11 of Draft NPS EN-1 set out that the relevance or otherwise to the decision-making process of the existence (or alleged existence) of alternatives to a proposed scheme is in the first instance a matter of law. The relevant legal principles relating to the assessment of alternatives include judicial principles set out in case law. **REP2-240**, at paragraphs 16.1.10 to 16.1.15, cites two cases: *R (on the application of Save Stonehenge World Heritage Site Limited) v Secretary of State for Transport* [2021] EWHC 2161 (Admin) and *R (Langley Park School for Girls Governing Body) v Bromley LBC* [2009] EWCA Civ 734 (which was cited with approval in the former decision). The Applicant agrees that these are two of the leading decisions on this point of law but does not agree with the

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
			Considering the first bullet point of para 4.4.3 of NPS EN-1, it is clear that a proportionate assessment of alternatives, in this case, would be an extensive one with a close-grained analysis of other options across the UK. *Being such an exceptional case, SNTS presses the view that this is a case similar to Save Stonehenge World Heritage Site Ltd. It is a case where alternatives are obviously material. A failure to set out properly an alternative sites assessment would be an overt flaw in the Environmental Statement; a failure in the Secretary of State to consider those alternatives would be an error of law*.	conclusions reached in **REP2-240** in applying these cases to the circumstances of the Scheme. In *Save Stonehenge*, the Holgate J affirmed the correct approach to the consideration of alternatives, as follows: "*Thus, in the absence of conflict with planning policy and/or other planning harm, the relative advantages of alternative uses on the application site or of the same use on alternative sites are normally irrelevant. In those "exceptional circumstances" where alternatives might be relevant, vague or inchoate schemes, or which have no real possibility of coming about, are either irrelevant, or where relevant, should be given little or no weight.*" Section 7 of the Planning Statement [**APP-261**] provides an analysis of planning policy compliance which demonstrates that the need for the Scheme is supported by planning policy and other national energy and environmental policy and that the Scheme addresses relevant national and local planning policies through its design, avoiding sensitive areas and limiting adverse impacts where possible. With the mitigation proposed, the ES demonstrates that the Scheme will not have any 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. Where 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. Holgate J found that the circumstances of the *Save Stonehenge* case that demanded an assessment of alternative options were "wholly exceptional": "*In this case the relative merits of the alternative tunnel options compared to the western cutting and portals were an obviously material consideration which the SST was required to assess. It was irrational not to do so.*"

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				Holgate J provided a number of reasons for this finding, with the key consideration being the location of the A303 Stonehenge scheme within the Stonehenge, Avebury and Associated Sites World Heritage Site. This circumstance does not exist in relation to Sunnica: • Holgate J emphasised that the WHS is an asset of *"the highest significance"* that has *"outstanding universal value for the cultural heritage of the world as well as the UK."* • The ExA and the SoS concluded that the overall impact of A303 Stonehenge scheme would harm the WHS, with the ExA concluding that the scheme would constitute substantial harm to the WHS. **REP2-240** states that the *Langley Park School* decision is authority for the proposition that where the consideration of alternatives is not required due to an exceptional circumstance, the relevance of alternative sites to an application is determined by the extent of the harm in planning terms that would be caused by the application. The Applicant agrees with this position, which was also affirmed by Holgate J in the *Save Stonehenge* decision. Applying this principle to the Scheme, it is clear that an assessment of alternatives of the kind suggested in **REP2-240** is not required: • As set out by paragraphs 7.1.8 to 7.1.10 of the Planning Statement **[APP-261]**, the Scheme will not result in any significant adverse effects on 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 and would not lead to substantial harm to any heritage asset. • NPS EN-1 and Draft NPS EN-1 acknowledge that adverse landscape and visual effects are likely, given the scale of energy NSIPs. As per paragraph 7.1.10 of the Planning Statement **[APP-261]**, the Scheme accords with the relevant specific planning policy tests. The impacts of the Scheme and its compliance with policy do not therefore warrant the decision maker to diverge from the policy requirements for consideration of alternatives that are summarised below.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				At paragraph 4.4.1 and 4.2.11, respectively, both NPS EN-1 and Draft NPS EN-1 state: *"From a policy perspective this NPS does not contain any general requirement to consider alternatives or to establish whether the proposed project represents the best option."* While there is no general policy requirement, paragraph 4.4.2 of NPS EN-1 and paragraph 4.2.12 of Draft NPS EN-1 set out the circumstances where the consideration of alternatives would be required: a. Where a scheme would lead to significant harm to biodiversity and geological conservation interests that cannot be avoided (NPS EN-1 section 5.3 and Draft NPS EN-1 section 5.4). b. Where a scheme would be located within, or partially within, Flood Zone 2 or Flood Zone 3 (NPS EN-1 section 5.7 and Draft NPS EN-1 section 5.8). c. Where a development would be located within either a National Park, the Broads or an AONB (NPS EN-1 section 5.9 and Draft NPS EN-1 section 5.10). Regarding point (a), above, ES Chapter 8, Ecology and Nature Conservation **[APP-040]** concludes that there would be no significant effect to interests as a result of the Scheme. Therefore, no alternative assessments are required to address this point. With reference to NPS EN-1 paragraph 5.3.7, as raised by **REP2-240** paragraph 16.1.7, the Scheme avoids significant harm to biodiversity and geological conservation interests and is therefore in accordance with this paragraph of the NPS. Regarding point (b), above, whilst the vast majority of the Order limits is located within Flood Zone 1 (as directed by NPS policy), small sections of the Order limits are located within Flood Zones 2 and 3. The Applicant has considered flood risk as part of its consideration of its Alternative Site Assessment **[APP-054]**. This shows that PDA3, the only potential development area (PDA) of a similar size to the Sunnica Sites, is also partially located with Flood Zones 2 and 3 and therefore not sequentially preferrable to the Sites. In addition, the

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				Applicant notes that Burwell substation is located within the defended Flood Zone 3A and that areas of Flood Zone 2 and 3 are widespread across land within 15km of Burwell Substation. Therefore, any scheme of comparable scale to the Scheme is unlikely to be able to avoid inclusion of some areas outside of Flood Zone 1. As set out by section 4.3 of the Flood Risk Assessment **[APP-095]**, the Applicant's consideration of alternative sites demonstrates that the Sequential Test has been applied and met. Regarding point (c), above, the Scheme is not located within a National Park, the Broads or an AONB. Therefore, no alternative assessments are required to address this point. Notwithstanding the above, paragraph 4.4.3 of NPS EN-1 and paragraph 4.2.13 of Draft NPS EN-1 set out the principles that should guide the SoS when considering the weight that should be given to alternatives. These include the principles described below. • Consideration of alternatives should be carried out in a proportionate manner. • Only alternatives that can meet the objectives of the proposed development need be considered, and the SoS should be guided by whether there is a realistic prospect of the alternative delivering the same infrastructure capacity (including energy security, climate change, and other environmental benefits) in the same timescale as the proposed development. • Alternative proposals which are vague or inchoate are not important or relevant to the SoS's decision. • The SoS should have regard to the possibility that all suitable sites for energy infrastructure of the type proposed may be needed for future proposals. In addition, paragraph 4.2.13 of Draft NPS EN-1 sets out that:

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				"the SoS should not refuse an application for development on one site simply because fewer adverse impacts would result from developing similar infrastructure on another suitable site." In considering alternatives and identifying and selecting the Site, the Applicant has been guided by principles described above and also by the technical and environmental requirements of a large-scale solar farm development project.
REP2-240	**Alternatives**	16.1.19 – 16.1.60	Process	In commenting on this section of **REP2-240**, the Applicant highlights the purpose of its site selection process. This purpose is set out in its response to paragraphs 16.1.1 – 16.1.2, and to paragraphs 16.1.3 – 16.1.18, above. This is to identify a suitable site and to explain the alternatives considered and the reasons for the Applicant's decision. A suitable site is one that is: • capable of delivering to the required scale (in relation to the need for the scheme); • technically and environmentally feasible within the stated timeframes; • accords with important and relevant planning policy tests; and is • commercially attractive to investors. The above sections explain that there is no policy or legislative requirement for the Applicant to demonstrate that it has selected the 'best' site, the least impactful site or that alternative sites would not, or could not, also be suitable. They also explain that should other reasonable alternative sites exist, these should not weigh against granting Development Consent for the Scheme. It is noted that the only policy requirement for the consideration of alternative sites to the Scheme is in relation to the flood risk Sequential Test. **The relevance of smaller developments as an alternative (16.1.19 – 16.1.24)** NPS EN-1 paragraph 4.4.3 and Draft NPS EN-1 paragraph 4.2.13 state that the decision maker: *"…should be guided in considering alternative proposals by whether there is a realistic prospect of the alternative delivering the same infrastructure capacity*

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				(including energy security and climate change benefits) in the same timescale as the proposed development" In addition, Draft NPS EN-1 paragraph 4.2.13 states that: *"only alternatives that can meet the objectives of the proposed development need be considered"* Whilst the Scheme comprises four connected sites, it is one single project that will deliver a large amount of renewable electricity to the National Electricity Transmission System (NETS). Smaller projects would not deliver the same infrastructure capacity in the same timescale as the Scheme and in accordance with the above-referenced paragraphs of NPS EN-1 and draft NPS EN-1, these are not considered to be reasonable alternatives to the Scheme. The following paragraphs describe the reasons that the Applicant identified and selected the Sites following a process to identify land which is suitable from a technical, environmental and planning perspective. Where applicable, the sections below refer to the matters set out in Section 4.28 of Draft NPS EN-3, *"Solar photovoltaic generation: factors influencing site selection by applicant"* and relevant sections of Draft NPS EN-1. **Alternative Site Assessment Methodology: Stage 1 – Identification of areas of search (16.1.25 – 16.1.45)** There is no standard approach to an alternative site assessment. The Alternative Sites Assessment **[APP-054]** is proportionate and is sufficient to explain the Applicant's reasons for selecting the Sites to describe the alternatives that it has considered. <u>Solar irradiation and topography</u> Paragraphs 2.2.1 and 2.2.2 of the Alternative Sites Assessment [**APP-054**] explain that East Anglia is "<u>an</u>" optimal region in the UK for solar development. The Applicant does not dispute that there are other locations in the UK that are also suitable for solar farms, as demonstrated by the figure on page 111 of **REP2-240** which shows that solar farms can be, and are, located across

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				England, including in East Anglia, which is one of the suitable locations for solar farms. Paragraph 6.4.1 of the Statement of Need [**APP-260**] lists factors considered to be important in the selection of the proposed location. These include *"irradiation and topography; availability and location for connection to the electricity system; planning and environmental constraints ...; and local considerations, including availability and ownership of land"*. The paragraph goes on to explain that *"Many of the above characteristics will not be a simple pass/fail for taking forward a site for development, but sites which are environmentally, technically, operationally and commercially suitable will likely score favourably on a majority of important characteristics"*. It is against this context that the proposed location has been determined, and not that of irradiation alone, as suggested in paragraphs 16.1.28 - 16.1.31 of **REP2-240**. <u>Grid Connection</u> In paragraph 16.1.35, **REP2-240** cites two planning applications from 2015 which were rejected, and in both cases proximity to grid was not accepted as a reason for development in a particular location. Those cases turned on specific planning issues relating to the particular proposals. Further, the recognition of the need for low-carbon generation has undergone a fundamental shift since 2015, and the need is both greater and more urgent than before. Decarbonisation of electricity (see Statement of Need **[APP-260]** Chapter 5) is now of critical importance, and Figure 6-1 of the Statement of Need **[APP-260]** shows National Grid's projections of installed capacity to meet the growing demand for low-carbon electricity. In particular, installed capacity is anticipated to treble in the 2050 timeframe, meaning that grid connection availability is now more important than ever. Building low-carbon developments close to existing infrastructure is therefore critically important. Paragraph 2.48.10 of Draft NPS EN-3 sets out: *"The connection of the proposed solar farm into the relevant electricity network will be an important consideration for applicants of solar"*

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				Further, with relevance to the claim made at 16.1.34 of **REP2-240**, Paragraph 2.48.12 goes on to explain that: *"The applicant may choose a site based on nearby available grid export capacity. Locating solar farms at places with grid connection capacity enables the applicant to maximise existing grid infrastructure, minimise disruption to local community infrastructure or biodiversity and reduce overall costs."* The electricity transmission system is major existing infrastructure that cannot be easily or quickly expanded. New large scale generating stations need to be located near the transmission system, where capacity to receive the electricity generated is available. Burwell Substation is part of the NETS that has capacity to receive power from a large-scale solar farm and transmit it over a wide geography. The Applicant sought a site that is well suited to connecting to Burwell Substation and secured a grid connection agreement from NGET. The Applicant identified that the Sites are suitable in terms of proximity to the Burwell Substation. As demonstrated by paragraphs 2.2.3 to 2.2.4 of the ASA, the Applicant's selection of land that would enable a connection to Burwell Substation directly accords with the Draft NPS EN-3 paragraphs 2.48.10 – 2.48.12. As demonstrated by the Statement of Need **[APP-260]**, the urgent need for large scale solar energy generation infrastructure is such that solar NSIPs in other location and/or connecting to other parts of the NETS will be required if commitments and objectives for a secure, affordable and zero carbon energy system are to be delivered. As such, land in other locations that would connect to another part of the NETS that also has capacity would be additional schemes that are also needed in addition to, and not instead of, the Scheme. Regarding the points made in 16.1.39 and 16.1.40 of **REP2-240**, the Applicant accepts the statement that the purpose of the NETS is to distribute power nationally to where it is needed. However, this purpose does not mean that there are no efficiencies to be made by locating schemes in specific places. For example, Scotland to England flows are currently constrained at times of high

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				wind, and the electricity consumer pays through industry charges for the Electricity System Operator (ESO) to manage those constraints. Also, transmission losses are experienced as a function of distance from the point of generation to the point of supply (the national balance point), and generators located nearer to where demand is generally located are therefore more efficient than if they were located further away. Lastly, National Grid, through the Transmission Network Use of System (TNUoS) regime, reflect the benefits of reducing infrastructure development needs by locating generators closer to demand. The Scheme, by virtue of its proposed location, is well located in respect of all of these points. **Stage 2 – The exclusion of planning, environmental and topographical spatial constraints (16.1.46 – 16.4.49)** **REP2-240** queries the rationale for excluding Grade 3 agricultural land at Stage 2 of the Alternative Sites Assessment **[APP-054]** when it is only Grade 3a land that is classified as 'best and most versatile' (BMV), with Grade 3b not being classed as such. Paragraph 2.3.1 of the Alternative Sites Assessment **[APP-054]** explains the rationale for this. It explains that planning policy seeks to direct development away from BMV agricultural land. It then sets out that available data does not distinguish between grade 3a and grade 3b land. Therefore, in order to ensure that it satisfies the policy objective to avoid BMV land it was necessary to exclude all land that national level data identifies as being within a category that is, or includes, BMV land. This meant excluding land that the national data identifies as Grade 1, Grade 2 and Grade 3. The only exception to this was where other information was available to indicate that land identified as Grade 3 by the national dataset would fall into sub-category 3b and therefore would not be classed as BMV. This was the case where discussions with landowners revealed that land identified as Grade 3 was unlikely to be BMV. Paragraph 16.1.49 of **REP2-240** states that *"Figure 10H makes the point that large areas of the scheme would have also failed on the basis of the gradient being above 3% in any event. Most notably, that would include the large area of*

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				*solar panels at Sunnica West A (W03, see [**APP-136**]).”* The Applicant respectfully disagrees. Figure 10H of the Alternative Sites Assessment **[APP-054]** shows that the vast majority of the Sites are flat, with only small pockets of land of land shown to be at slope gradient of >3%. **Stage 3 – Identifying potential alternative solar development areas (16.1.50 – 16.1.56)** Paragraphs 2.4.2 to 2.4.6 of the Alternative Sites Assessment **[APP-054]** explain the rationale for the approximate minimum and total size thresholds for sites used in the Applicant's selection of the Sites. The Applicant used publicly available datasets to inform its Alternative Sites Assessment **[APP-054]**. This included local planning authority brownfield land register. In addition, the Applicant considered alternative locations, including brownfield sites that were raised by stakeholders at non-statutory and statutory consultations, as explained by paragraph 3.2.6 and listed at Table 3-1 of the Alternative Sites Assessment **[APP-054]**. The Applicant considers this to be a reasonable and proportionate approach. At paragraph 16.1.52, SNTS proposes that large-scale solar projects should locate on previously developed or lower value land where possible and at 16.1.56 claims that *“There is no consideration of alternatives using commercial buildings and existing development where suitable”*. In light of their scale, most brownfield and all rooftop solar installations are or will be “Distributed Generation” – because they connect to the electrical Distribution systems, rather than the National Electricity Transmission System. Section 7.5 of the Statement of Need **[APP-260]** describes that Distribution networks operate at a lower voltage than the transmission networks, and are located closer to points of final demand, so generators which connect to these systems will have smaller capacities than those which connect to the NETS. The urgent need for large capacities of new solar generation in the UK in order to meet climate change obligations simply means that brownfield sites are highly unlikely to be capable of accommodating a sufficient scale of solar generation to meet decarbonisation needs. Any delay in developing greenfield sites therefore places the achievement Net Zero at a significantly greater risk

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				than would be the case if both greenfield and brownfield sites were developed with the same priority. Section 7.5 of the Statement of Need **[APP-260]** concludes that *"need for distribution connected generation is in addition to, not the place of, the need for additional transmission connected generation. The development of distribution connected generation will not do away with the need for further transmission connected capacities"*. **Stage 4 – Further evaluation of potential solar development areas considered suitable for development** This section of **REP2-240** queries the rationale for selection of the Sunnica sites over PDA3. Paragraph 16.1.58 of **REP2-240** states in relation to Annex B of the Alternative Sites Assessment **[APP-054]** that *"the section discussing Sunnica does not identify planning permissions and land uses concerning the AD Plant at Worlington, the polytunnels application, and the use of Worlington Quarry."* The Applicant notes that none of these represent a land use conflict with the Scheme for the following reasons: • As per the paragraph 4.1.21 – 4.1.28 of the Applicant's Written Summary of Sunnica Limited's Oral Submissions at Development Consent Order Issue Specific Hearing on 1 November 2022 **[REP2-036]**, there is no conflict between the Scheme and the planning permission for the AD Plant at Worlington. • Planning application DC/21/0217/FUL for polytunnels has not been determined and the planning application site is located outside of the Order limits. • The Scheme overlaps with the boundary of Worlington Quarry in one location, the land affected by the overlap represents a small area in the southwestern corner of the quarry, as identified by the Restoration Overlap Plan **[APP-018]**. Paragraph 2.6.5 of Planning Statement Part 1 **[APP-261]** explains that mineral in this area has been identified by the quarry owner and operator as being either barren or not of sufficient quality or quantity to be viable for extraction. As such, the Scheme will

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				not result in the sterilisation of consented mineral reserves within the quarry that would otherwise be extracted and therefore does not represent a conflict with the operation of the quarry. The Sunnica Sites therefore successfully avoid land use conflicts, and the 'amber' rating for land use set out in Annex B of the Alternative Sites Assessment **[APP-054]** is justified. Paragraph 16.1.59 of **REP2-240** suggests that cultural heritage and landscape indicators for the Sunnica sites set out in Annex B of the Alternative Sites Assessment **[APP-054]** should also have been rated as 'red' rather than 'amber'. The Applicant respectfully disagrees and notes that Limekilns is not located within a designated landscape, and residual significant visual effects at year 15 of the Scheme have been identified by the ES **[APP-042]** at only one important or sensitive viewpoint (Limekilns). The Applicant also notes that the ES concludes that the operation of the Scheme will have a significant impact on only three designated heritage assets (none of which amount to substantial harm). The 'amber' ratings, based on professional judgement, are therefore considered to be a reasonable application of the evaluation criteria set out in Annex B of Alternative Sites Assessment **[APP-054]**.
REP2-240	Alternatives	16.1.61 – 16.1.71	Outcome, Alternatives and Conclusion	The purpose of the Applicant's site selection process was to identify a suitable site. As demonstrated by the analysis of the Scheme's compliance with important and relevant matters and specific policy planning tests in the Planning Statement **[APP-261]**, the Applicant has achieved this objective. There is no standard or approved methodology for an alternative sites assessment. The Alternative Sites Assessment **[APP-054]** explains the rationale behind the selection of the Sites and represents a reasonable and proportionate approach to explaining the alternatives considered by the Applicant and the reasons for the Applicant's selection. The Applicant notes that there is no general policy or applicable legislative requirement for the Applicant to consider alternatives, and there is no requirement for the Applicant to demonstrate that it has selected the 'best' site, the least impactful site or that alternative sites would not or could not also be suitable.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
REP2-240	**Environment - Climate**	12.1.27 - s.	"*The degradation factor used for the scheme is 0.55%. Cranfield do not challenge this. However, draft NPS EN-3 indicates that the degradation could be up to 1%. If that is the case, the overall generation of the scheme will decline with greater speed.*"	The 0.55% degradation rate built into the energy generation modelling for the Scheme is based on the warranty of the panels used for the modelling. This is therefore considered to be a robust approach.
REP2-240	**Environment - Climate**	12.1.27 - t.	*"Draft NPS EN-3 identifies that this scheme has an unusually long life: 25-30 years compared to the stated 40 years by the applicant. Again, if the lifetime is shorter this will have a further negative impact on the carbon emissions."*	NPS EN-3 states "*Solar panels typically have a design life of between 25 and 30 years, although this can sometimes be longer*". While 40 years may be longer than the 'typical' lifetime suggested in NPS EN-3, the design life of the Scheme will be 40 years. The 40-year period is the period that would be confirmed within the DCO, and therefore the assessment is based on this period.
REP2-240	**Environment - Climate**	12.1.22 - 12.1.27	Concerns around the findings of the Cranfield University report, which suggests the Scheme is in fact a net emitter of carbon over its lifetime.	Please refer to Appendix A: Applicant's response to Cranfield University's report on carbon emissions.
REP2-240	**Environment - Built Heritage**	4.1.6-4.1.7	Impacts upon heritage assets need to be weighed against the benefits of the Scheme and great weight should be given to the conservation of the heritage assets.	The Applicant has assessed impacts to heritage assets within the ES Chapter 6 – Cultural Heritage **[APP-039]**. This has identified one element of significant effects to built heritage (at Chippenham Park) which are considered to cause less than substantial harm. The Applicant has incorporated mitigation into the Scheme to reduce the impact to the historic environment, but acknowledges that the impact cannot be removed in all cases. The Planning Statement sets out the Applicant's consideration of the planning balance in respect of the Scheme in sections 6 and 7 of the Planning Statement **[APP-261]**. This includes a consideration of the public benefits when weighed against the harms of the Scheme, including those to built heritage. For the

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				reasons discussed in that Statement, the benefits are considered to outweigh the less than significant harm caused.
REP2-240	**Environment - Archaeology**		Impacts upon Archaeological Assets	The Applicant has worked with the joint LPA Historic Environment Teams to undertake and extensive evaluation resulting in a highly detailed assessment of the archaeological impact. Embedded mitigation in the form of the removal of significant areas of archaeology from development and in some cases arable agricultural use, together with a commitment to manage and protect these areas, provides a positive contribution through public benefit. A moderate adverse impact upon the setting of Chippenham Barrow Cemetery has been identified in the E.S. NPS EN-1 paragraph 5.8.18 states that "*When considering applications for development affecting the setting of a designated heritage asset, the IPC should treat favourably applications that preserve those elements of the setting that make a positive contribution to, or better reveal the significance of, the asset. When considering applications that do not do this, the IPC should weigh any negative effects against the wider benefits of the application. The greater the negative impact on the significance of the designated heritage asset, the greater the benefits that will be needed to justify approval".* The Applicants Detailed Archaeological Mitigation Strategy (DAMS) will include a series of dedicated research aims relating to the barrow cemetery and wider landscape; as well as mitigation proposals for archaeological impacts more generally. These, together with the results of the mitigation within the development, will provide a focus for research that will result in a better understand of the barrows in the landscape and their contemporary settlements; and the archaeology in and around the Scheme more generally. The results of this research will also provide an opportunity for permanent public interpretation. Although there would be harm to the significance of the setting of the barrow cemetery, this would be temporary and as little is currently known about the barrows and wider archaeological landscape, it is the Applicants opinion that the local conservation of the barrow cemetery (See NPS 5.8.14) and the permanent

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				knowledge gain represents a great benefit this and future generations and that this should be considered in accordance with national policy tests. The Applicant will ensure that archaeological impacts throughout the entire scheme will be mitigated in accordance with the agreed DAMS and in close consultation with the joint LPA's. The DAMS will be a fluid document that will require updating as the fieldwork progresses, for example to include any mitigation strategies required as a result of Phase 2 trench evaluation. Site Specific WSI 's in agreement with the joint LPA's will be appended to the DAMS as required. A range of contingency scenarios for mitigation of unforeseen remains of significance, including, where possible, options for preservation in situ, will be included in the DAMS.
REP2-240	**Environment - Ecology**	6.1.10	SNTS maintains that the applicant's submissions on ecology fails to present a sufficiently accurate representation of the baseline ecological interest present within the proposed order limit and are not therefore sufficiently reliable for robust decision-making. SNTS maintains that the overall compliance of the scheme with national policy need to avoid net biodiversity loss.	The Applicant has followed best practice in undertaking surveys to establish the biodiversity baseline, e.g. CIEEM standards and Bat Conservation Trust guidelines. This also applies to Stone Curlew using the method used by the RSPB. This has created a sound baseline on which decision making can be confidently based. The Scheme will confidently achieve a biodiversity net gain (BNG) using the Defra Metric 3.1, regarded as best practice, further to the habitat creation measures secured through the OLEMP. An update to the BNG Assessment will be submitted to the Examination in due course.
		6.1.13	Applicant's response dated 16 September 2022: "Further surveys, including the calculation of BNG using metric 3.1, will be reported in a technical note which will be shared with all stakeholders	An updated calculation of Biodiversity Net Gain is to be provided by the Applicant, using the latest Defra metric 3.1. This will be submitted to Examination in due course, will deal with on-going discussions with stakeholders and aspects such as mitigation (there being no need to provide any compensation habitat) for protected species and the issue of the 40 year timespan, and enable scrutiny of the calculation process. This updated metric will also account for the Applicant's proposals to remove Sunnica West Site B

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			through submission to PINS during the Examination for Deadline 1." SNTS would like to review further survey work that was included within submission made at Deadline 1.	from the Scheme, as discussed in the Heritage and Substation Connection Update also submitted at Deadline 3A.
		6.1.12	SNTS maintains that the mitigation and compensation proposals offered have being founded on an incomplete understanding and/or representation of the baseline position and an, at best, optimistic view of the delivery challenges they will face, cannot in their present form be relied upon by decision makers as a safeguard to avoid the project ultimately giving rise to significant net loss of biodiversity.	The majority of the Scheme is based on arable agriculture which has a low biodiversity value, widely recognised as being so low as to be of national concern. The Scheme can confidently achieve significant enhancement of biodiversity, for example, by creating diverse grasslands and other habitats throughout the Scheme, linking these into the wider landscape. It should be noted that the BNG calculation does not recognise substantial ecological gain as a result of the cessation of fertilisation, pesticide and application and crop irrigation. This more natural ecology of the Scheme sustained over 40 years will have direct benefits, e.g. to soils, and indirect benefit, e.g. to local rivers, such as the Rivers Lark and Snail. The comprehensive planting strategy, will deliver enhanced green infrastructure across the Order limits by establishing the following new and enhanced habitats: • Woodland – 52ha • Hedgerows – 7.4km • Individual trees – 400
REP2-240	**Environment - Water**		SNTS notes the winter fill of reservoirs by abstraction of water enables the Agency to manage unwanted flooding by abstracting during periods of high flow in winter. It is stated that for two reservoirs (south of	With reference to the Environment Agency's letter dated 14th July 2022 (Appendix I of the WR), the Environment Agency do not state that winter fill reservoirs enable them to manage winter flood risk. The Environment Agency state that they support in principle reservoirs that are only allowed to fill during the winter when higher river flows are more common, as this avoids abstraction at more environmentally sensitive times of the year. We note that the

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
			Elms Road in Sunnica East, and south of Chippenham Road close to Sunnica West A) this activity will cease, and this may affect flooding potential.	Environment Agency do add that such abstractions can help reduce unwanted flooding, although this is not the purpose of the reservoirs. With regards to quantifiable flood risk, the Environment Agency produce the flood map for planning extents. Abstraction of water from a watercourse in a high flow state is not a formal measure of flood defence and not included within the Environment Agency flood map for planning. Winter fill practices do not act specifically as flood alleviation schemes, insofar as it is not guaranteed the reservoir has capacity to be filled in every high river flow event and to what return period event they might be effective for, given the relatively small volumes of the reservoirs compared to overall catchment size. The reduction in flood risk from an abstraction into an agricultural storage reservoir cannot be quantified. The areas of fluvial flood zones 2 and 3, and the hydraulic model levels are the most important factors in determining the potential for fluvial flooding in an area. The published levels / flood mapping data have been used within the Flood Risk Assessment **[AS-007]**, which is compliant with planning policy. The surface water drainage system mitigation being included within the Scheme will result in a reduction in flow rates from the Order Limits at peak events. In terms of Environmental Impact Assessment, this is not considered to be significant.
REP2-240	**Environment - Landscape and Visual**		Section 3 of **REP2-240** summarises the position of SNTS regarding landscape and visual impacts. It is supported by Annex A, which comprises a review of the landscape and visual impacts of the Application by Michelle Bolger Expert Landscape Consultancy (MBELC). MBELC disagree with some of	The Landscape and Visual Impact Assessment (LVIA) summarised in Chapter 10 of the Environmental Statement (ES) **[APP-042]** and supported by associated appendices and figures provides a detailed and robust assessment of the likely significant effects on the landscape and people's views of the landscape. It follows a structure which is consistent within the ES for other topics, addressing the effects of each Site within the Scheme in turn for the construction, operation and decommissioning phases. The methodology is set out in Appendix 10C of the ES **[APP-102]**, explaining which best practice has been referred to, with further clarification provided in Appendix L of the Applicant's response to the First Written Questions **[REP2-038]**.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
			the judgements made by the Applicant and consider that these underestimate the harm that the proposals would cause and overestimate the effectiveness of mitigation planting.	A hierarchical approach has been applied to the assessment of landscape effects, and this has informed the design of the Scheme from the strategic scale masterplan to specific elements of the mitigation. This is necessary to draw distinctions between the effects on the landscape and is not intended to give a false impression of the overall impact of the Scheme, which is clearly expressed and justified. Effects of construction, year 1 of operation and decommissioning have been assessed in winter, representing the worst-case scenario. Further detail on this approach, including consideration of intra-project cumulative effects, is set out in Appendix M of the Applicant's response to the First Written Questions **[REP2-038]**. The LVIA acknowledges that the construction, operation and decommissioning of the Scheme will result in adverse effects on the local landscape. However, the Applicant does not agree the Scheme is in conflict with the relevant National Policy Statements (NPS). NPS EN-1 attaches greatest weight to the preservation of nationally designated landscapes, such as Areas of Outstanding Natural Beauty (AONB). No part of the Scheme is located within or in proximity to a nationally or locally designated landscape, although the Applicant agrees that high value is placed locally on parts of the landscape in and around the site. It is low-lying and the topography is flat or gently undulating with a framework of existing vegetation, maximising opportunities for integration. NPS EN-1 recognises that virtually all nationally significant infrastructure projects will have effects on the landscape and that the aim should be to minimise these, providing reasonable mitigation where possible and appropriate. The Applicant does not agree that the Scheme will be the feature that defines or dominates the landscape or that it will virtually surround settlements, as is evident from the parameter plans **[APP-135 and APP-136]**. The landscape within the DCO site and the study area for the LVIA is the product of centuries of human intervention. Whilst it includes some semi-natural features and distinctive characteristics, it is principally a landscape of intensive agricultural production, with other modern rural land uses. Landscape character is not static and evidence of change is visible throughout the landscape. For

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				example within and around Sunnica East Site B where extensive pig farming and quarrying previously extended across the landscape. The LVIA has been a key tool in the iterative design of the Scheme, to avoid and minimise effects on the landscape and people's views and visual amenity, as described in the Design and Access Statement (DAS) **[APP-264]** and the Outline Landscape and Ecology Management Plan (OLEMP) **[REP3-15]** and the settlement iteration note submitted at Deadline 2 **[REP2-038]**. This includes the siting of the BESS, substations and compounds to maximise landscape integration and minimise visual intrusion. The low maximum height of panels is similar or lower than the height of existing vegetation. The assessment of visual effects demonstrates that the Scheme will not dominate views and that features and characteristics that contribute to sense of place, such as skylines, landmarks and visual connections between settlements will be preserved. The design principles in the Application demonstrate good design in terms of siting relative to existing landscape character, landform and vegetation. The Scheme utilises existing features, such as hedges and tree belts as screening and planting, such as woodland planting, to assist in site security. The substantial areas of woodland planting (52ha) and hedgerow planting and enhancement (7.4km) proposed will reinforce the existing landscape framework, further increasing the capacity of the landscape to accommodate the change. This planting will also be effective in further limiting the visual impacts of the built elements of the Scheme such that most effects will not be significant by year 15 of operation. Photomontages presented in Figure 10-90 **[APP-220]** to Figure 10-102 **[APP-232]** are scale-verifiable and have been prepared in accordance with Landscape Institute Technical Guidance Note 06/19. Checks on site with acetates at viewpoint 15A on 16 November 2022, after ASI2, confirm that the scale is correct when printed at the intended paper size. The location of the viewpoints selected was discussed with host planning authorities in preparation of the Application. These locations were selected to represent a range of views and sensitive visual receptor groups. As the design of the Scheme is outline, some elements such as the BESS are shown as occluded wirelines, in

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				accordance with best practice. A conservative growth rate of 20cm per year has applied to planting as set out in paragraph 10.3.11 of chapter 10 of the ES. The Applicant disagrees with the conclusions drawn by MBELC that the significance of residual landscape effects are higher than those assessed by the Applicant. The Guidelines for Landscape and Visual Impact Assessment, 3rd Edition acknowledges that even with qualified and experienced professionals there can be differences in the judgements made. In this case, there are clear differences of professional opinion, particularly with regard to the ability of the landscape to accommodate the change and the effectiveness of the mitigation in avoiding or minimising the residual effects. This will be able to be discussed further at the forthcoming hearings and in the Applicant's Deadline 4 submissions.
REP2-240	**Environment - Socio-economics**	9.1.9 9.1.10	There will be limited employment benefits during construction and decommissioning, with the skilled jobs likely to use skills from outside the area. There is also concern for the assessment on the number of agricultural jobs displaced by the scheme. There will be limited operational jobs generated and therefore there will be a negligible long term sustainable positive impact on employment. SNTS expresses concern that the scheme will impact the recreational use of the area	The home-based workers assessment presented in Chapter 12 of the ES **[APP-044]**, set out as a Leakage factor within the assessment of construction and decommissioning employment generation, was carried out using Census 2011 Origin and Destination data representing the number of people that travel into the 45-minute travel area for work, amounting to 88% workers being home-based. The Applicant therefore considers its methodology of assessment to be an appropriate level of detail on which to base an assessment of significant effects in EIA. The Applicant acknowledges that a more detailed assessment of home-based workers is possible outside an EIA. To further this, the Applicant has considered the roles required by number of workers and whether these are skilled, semi-skilled and unskilled. The Applicant considers that the semi-skilled and unskilled roles have the potential to be met by the local labour force and provide local economic benefit. The Applicant's response to paragraphs 12.27 to 12.33 in Chapter 12 of the Applicant's Response to the Local Impact Report **[REP3-019]** as submitted at Deadline 3 explains how the Applicant has stated a general aspiration to involve local businesses and contractors as far as practicable during the construction phase and outlines the measures on how this will be achieved. The Applicant's

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
			and in particular, public right of ways. SNTS also expresses concern that the scheme will impact local tourism.	Response to Relevant Representations Volume 8 explains the rationale for the assessment on agricultural employment. The Applicant's response to paragraphs 12.67, 12.70 and 12.73 in Chapter 12 of the Applicant's Response to the Local Impact Report **[REP3-019]** as submitted at Deadline 3 explains the findings from the assessment of operational employment set out in Chapter 12 of the ES **[APP-044]**. In terms of impact on recreational use and PRoW, Chapter 10: Landscape and Visual Amenity of the Environmental Statement **[APP-042]** assesses 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. Accordingly, Chapter 12 of the ES **[APP-044]** also assessed the effects on views and use of PRoWs. The Scheme has been designed to minimise the number and duration of PRoW closures, including along the cable route. If closure of routes is required then, as a worst-case scenario, it has been assumed that the PRoW would be closed for no more than three weeks, and therefore not considered to have a significant or long term impact. The overall assessment concluded that there would be no significant effects. There are three permissive routes which are incorporated into the design and illustrated on Figure 3-10 (indicative location shown, the final location subject to landowner agreement) which will be secured through Appendix 10I: OLEMP of the Environmental Statement **[REP3-011]** and Requirement 21 of the draft DCO. These permissive paths will enable increased public access across the landscape of the local area and thus respond positively to local GI strategy and local planning policies relating to rights of way. The paths proposed are: • 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; • 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

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				• 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. In terms of the impact on local tourism, 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 such an assessment. 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.
REP2-240	**Environment - Socio-economics**	Section 7	The Horseracing Industry	A Horseracing Industry Impact Assessment **[REP2-039]** has been submitted by the Applicant. This concludes that there are no compelling reasons to show that the horseracing industry will be impacted detrimentally in its operations or longer term viability as a result of the Scheme. The Applicant appreciates that this is a matter which will be further considered at the forthcoming hearings. If necessary it will supplement its existing submissions after the hearing has been concluded.
REP2-240	**Environment - Transport**	18.1.1, 18.1.2	SNTS recognise that they are not well placed to address the issue of traffic arising out of the scheme. This is primarily a	The Applicant has provided a response to the Local Highway Authorities' Local Impact Report and other submissions.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
			matter for the local highway authorities.	
		18.1.3	Changes to aid passage of HGVs will make roads more amenable to passage of other HGVs. And result in higher speed access around villages	The changes to the highway network referenced in the response are primarily to the site accesses to ensure they can accommodate the appropriately sized vehicles in a safe and controlled manner. This is to ensure the safety of the construction workers as well as the public. The changes at the site accesses will not impact the traffic speeds along the highway and will not affect traffic speeds during operation of the Sunnica Energy Farm. The Applicant proposes to make localised highway works along Elms Road and La Hogue Road to provide passing places (not extended sections of highway) in order to accommodate two-way HGV movements in the vicinity of the site accesses. This is set out in the Transportation Technical Note [**REP2-045**] and will be included in an update to the Framework Construction Traffic Management Plan and Travel Plan [**REP3-014**] which will be submitted at Deadline 3A. It is not proposed to provide extensive lengths of widened carriageway. The highway works proposed on Elms Road and La Hogue Road are to provide safe passage for two-way HGV movements in the interest of safety to the construction workers and the public. The proposed highway works along Elms Road and La Hogue Road will not result in a material change in vehicle speeds during the construction period. The Applicant has proposed temporary changes to accommodate the passage of Abnormal Indivisible Loads (AILs) which is provided within the Framework Construction Traffic Management Plan and Travel Plan [**AS-300**, **AS-301**]. These include the temporary removal, and then subsequent prompt reinstatement, of street furniture. The Applicant has identified a range of Temporary Traffic Management which includes temporary traffic signals, temporary speed limit reductions and temporary road closures in the interest of safety relating to the construction workers and the public. The Temporary Traffic Management Measures are outlined in the Traffic Regulation Measures Plans, with the latest versions provided at Deadline 2 [**REP2-007** to **REP2-011**].

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
		18.1.4	Concern re use of U6006	The Applicant proposes to cross U6006 for the purpose of installing the cable corridor and constructing and maintaining E12 and ECO3; however, the Applicant does not propose to use U6006 as a route of access for construction vehicles. The Applicant has committed to conditional surveys of the highway, which includes PRoWs, to make good any damage caused during the construction period. This commitment is provided within the Framework Construction Traffic Management Plan and Travel Plan [**REP3-014**].
		18.1.5, 18.1.6, 18.1.7, 18.1.8	Observations on construction programme	The programming of the construction phase is a matter for the Applicant to produce and have provided details of the proposed construction programme in the Transport Assessment [**APP-117**]. The construction of the grid connection corridors (cable corridor) are not definitively programmed in to occur at the beginning of the construction period as this will occur when necessary. The grid connection corridor has been identified within the table provided in paragraph 18.1.6 as assessing the worst-case scenario in terms of trip generation in order to provide a reasonable worst-case scenario. The Transport and Access chapter of the ES [**APP-045**] and Transport Assessment [**APP-117**] did not identify significant effects, in EIA terms, as a result of assessing the worst-case scenario of the construction of the grid connections corridors occurring during the peak construction of Sunnica East Site A and B and Sunnica West Site A and B.
		18.1.9, 18.1.10	Forecast level of traffic is average and one way and therefore an underestimate	The Transport and Access chapter of the ES [**APP-045**] is based on the assessment of the peak number of HGVs, which is 155 in Month 3, and not the average number of HGVs in Months 1-8. The forecast, and therefore the ES assessment, is also based on two-way movements, not one-way flows as suggested. Therefore, the information provided by the Applicant does not underestimate the level of traffic.
		18.1.11,	**APP-118** para 2.7.4	The Applicant is unable to find the paragraph quoted in the SNTS response in paragraph 18.1.11 as these are not in the Transport Assessment [**APP-117**] or the Framework Construction Traffic Management Plan and Travel Plan

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
		18.1.12		submitted with the application [**APP-118**]. The Applicant has provided a summary below for clarification. The level of HGV traffic for the construction of the Scheme is set out and assessed in the Transport Assessment [**APP-117**]. Table 6-1 of the Transport Assessment [**APP-117**] provides a summary of the forecast daily HGVs per construction month. A peak number of 155 HGV deliveries per day are forecast across the Order Limits during month 3 of the construction period. This amount of HGV traffic will be short term. The average number of daily HGV deliveries between months 1-8 will be 119 which will then reduce to a daily average of 38 HGV deliveries between month 9-24. Further information regarding the peak daily number of HGVs forecast for Sunnica East and West is set out in Table 2-1 within the Framework Construction Traffic Management Plan and Travel Plan [**REP3-014**].
		18.1.13	Comparison with the Cleve Hill NSIP	The traffic generation for Sunnica has been determined based on the characteristics of the Sunnica project and is therefore appropriate for the specifics of the requirements of the Scheme. The comparison provided is noted, however each Nationally Significant Infrastructure Project (NSIP) is required to be assessed on their own merit and based on their own parameters. The Applicant has done this, and details of the construction programme and characteristics provided within the Transport Assessment [**APP-117**] are bespoke to the Scheme.
		18.1.15 18.1.16	Control measures – ANPR and GPS for monitoring is burdensome and risks not being enforced properly	The Applicant has committed to monitoring, reporting and enforcement measures as set out in Sections 7 and 8 of the Framework Construction Traffic Management Plan and Travel Plan [**REP3-014**]. This was updated at Deadline 3 to provide further clarification and commitment from the Applicant. The concern regarding the technology mentioned is noted, however the Applicant has made the commitment to monitor, report and enforce however the precise technology to be used to achieve this is not fixed by the Framework Construction Traffic Management Plan and Travel Plan, and the details of the proposed management system are required to be approved by the relevant

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				county authorities in accordance with Requirement 16 of the draft DCO, before the Scheme is commenced.
		18.1.17, 18.1.18, 18.1.19, 18.1.20, 18.1.21	Rail freight could be used	The Applicant has assessed the worst-case scenario in terms of the impact of transporting materials to the site, which is the use of the highway network. National Highways is in agreement with the methodology used and has raised no objection. This is evidenced in the Applicant's Statement of Common Ground (SoCG) with National Highways [**REP2-048**]. The comment made regarding the use of rail transport is noted. However, the DCO application does not preclude the use of rail freight as an alternative method of transport if it is deemed viable at the time of construction.
		18.1.22	Rigid application of central parking is difficult to enforce	The purpose of the two centralised car parks for construction staff has been identified to minimise the potential impact of construction staff vehicles travelling to multiple car parks across the scheme. The two centralised car parks are located within close proximity of the A11, which therefore reduces the need for construction staff to travel on local roads. The construction staff will be transported around the Scheme using internal tracks / movements to minimise the number of vehicle trips on the local highway network. The construction staff will be moved to site accesses which cannot be accessed via internal routes / tracks by mini-buses. These movements will occur in the periods 0700-0800 and 1800-1900, i.e. outside of the network peak hours (0800-0900 and 1700-1800). The application of two centralised car parks and the use of mini-buses is an efficient way of distributing construction staff around the site and reducing the number of construction staff vehicles on the local highway network. The construction workers will be typically working within one part of the site per day, rather than in multiple different parts throughout the day. Thus, there will be minimal need for movement of construction staff throughout the day.

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		18.1.23	Impact of car travel/car share factor	The parameters used to determine maximum numbers of workforce movements are robust. Notwithstanding this, the Applicant has updated the Framework Construction Traffic Management Plan and Transport Plan [**REP3-014**] at Deadline 3, to include a commitment to monitor total vehicle levels at the two main staff accesses, and introduce a cap in vehicle numbers calculated at the level of a 1.3 vehicle occupancy to ensure the maximum assessed level of vehicle trips is not exceeded. Capping based on vehicle numbers, rather than car occupancy, addresses the crux of the parameter for which control is sought, whilst enabling the Applicant to achieve this through other measures, such as the mini-bus which is set out in the Framework Transport Plan. The Applicant will monitor and cap the number of staff vehicles travelling to the site based on peak construction flows at 1.3 occupancy, as per the sensitivity test presented in the Transportation Technical Note [**REP2-041**] submitted at Deadline 2. This is due to the 1.3 car occupancy sensitivity test not showing a greater impact on the local highway network and did not change the conclusions of the assessments undertaken. Construction staff traffic will be restricted and only able to travel to the site between 06:00-07:00 and depart the site between 19:00-20:00.
		18.1.24, 18.1.25, 18.1.26	Concern re off-site parking	The Applicant respectfully disagrees with the statement that the permit system will result in nuisance parking in nearby villages. The two centralised car parks and permit system have been developed to reduce the impact of construction staff on the local highway network and local communities. Given the proposed number of car parking spaces to be provided can accommodate the forecast peak number of construction vehicles there is no incentive for construction staff to park off-site. As identified in the Framework Construction Environmental Management Plan [**APP-123**], a Community Liaison Group will be set up prior to construction and a Community Liaison Officer (CLO) will be appointed to engage with local communities during construction. Contact details will also be available on the display board at the site entrance should anyone wish to make contract.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				With regards to "fly" parking, the role of the CLO will be to listen to any concerns of local communities which may arise, and investigate as necessary. If staff are parking off-site, and this is causing a highways safety or amenity issue, the CLO will liaise with staff through the TP and encourage staff to use the on-site parking instead. The two staff car parks can accommodate the peak number of construction staff vehicles forecast as identified in the Transport and Access chapter of the ES [**APP-045**] and TA [**APP-117**]. Whilst the use of on-site parking will necessarily be security controlled, there will be no restrictions or charges to valid construction staff accessing the car park, and therefore there should be no incentive to "fly" park and every incentive to use the designated on-site parking. The comment on monitoring of 'fly parking' is noted. The Framework Construction Traffic Management Plan and Travel Plan [**REP3-014**] also provides the commitment at 7.3.2, from the Applicant for the Transport/Travel Plan co-ordinator to "liaise proactively as appropriate with local transport and traffic groups, local planning authorities, local highway authorities, National Highways, and the police, Parish Councils, the public, and the East of England Ambulance Service NHS Trust (EEAST). To include recording and collating any complaints relating to transport aspects of construction activities." Section 7.4 of the Framework Construction Traffic Management Plan and Travel Plan [**REP3-014**] requires reporting on information on complaints received on transport related issues including parking. In addition, the use of mini-buses to pick-up and drop-off construction staff from local residential areas will be investigated to minimise the number of construction staff vehicles travelling to/ from the two centralised car parks.
		18.1.27, 18.1.28, 18.1.29	Concern with how many minibuses will be used to transport staff to work areas Minibus wont be more attractive than driving	The number of mini-buses on the local highway network is identified within the Transport Assessment [**APP-117**], which does not include those internal mini-bus movements which are not on the local highway network. The numbers quoted within paragraph 18.1.27 of the REP2-240 are incorrect. The Transportation Technical Note [**REP2-041**] also provides further information on the use of mini-buses.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				The peak number of external mini-buses trips are forecast to be 59 (single direction) on the local highway network based on the peak number of construction staff in month 9. On average across the construction period, 27 mini-bus trips (single direction) are forecast on the local highway network. The external mini-bus trips are forecast to occur in the morning once construction staff have arrived on site and are ready to be transported to the construction zones. This means that they will occur from 07:00. The external mini-bus trips will occur before the AM network peak hour (08:00-09:00) based on the construction staff start time of 07:00. The external mini-bus trips are forecast to occur in the evening as a result of transporting the construction staff from the construction zones back to the two centralised car parks. These mini-bus trips will occur prior to 19:00 to collect the construction staff. All the external mini-bus trips will occur after the PM network peak hour (17:00-18:00). The Applicant has updated the Framework Construction Traffic Management Plan and Travel Plan [**REP3-014**] at Deadline 3, to include a commitment to monitor total vehicle levels at the two main staff accesses, and introduce a cap in vehicle numbers to ensure the maximum assessed level of vehicle trips is not exceeded. Capping based on vehicle numbers, rather than car occupancy, addresses the crux of the concern regarding levels of traffic to be addressed, whilst enabling the Applicant to achieve this through a range of measures, including car sharing and use of a mini-bus, as set out in the Framework Transport Plan.
		18.1.30, 18.1.31, 18.1.32	Comparison with Sizewell is not realistic Workers will travel to local areas at lunchtime	The Transportation Technical Note [**REP2-041**] provides a review of other solar, wind and power station DCO projects. It is common and robust for a car share factor of 1.5 to be used in assessments across a wide range of projects, as was used for Sizewell. Furthermore, a sensitivity test of a car share parameter of 1.3 is presented in the Transportation Technical Note, based on the lowest level of occupancy applied for the aforementioned reviewed projects. This demonstrates that no additional significant effects would arise should a lower factor be used. The Applicant has updated the Framework Construction Traffic Management Plan and Travel Plan [**REP3-014**] at Deadline 3, to include a commitment to monitor total vehicle levels at the two main staff accesses, and introduce a cap

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				in vehicle numbers to ensure the maximum assessed level of vehicle trips is not exceeded. Capping based on vehicle numbers, rather than car occupancy, addresses the crux of the concern regarding levels of traffic to be addressed, whilst enabling the Applicant to achieve this through a range of measures, including car sharing and use of a mini-bus, as set out in the Framework Construction Traffic Management Plan and Travel Plan [**REP3-014**]. As outlined in Chapter 3: Scheme Description **[REP2-022]** construction compounds will be located within Sunnica East Sites A and B and Sunnica West Sites A and B. These will provide facilities for workers so they will not be required to travel off-site on their lunchbreak which will include welfare facilities, washrooms, toilet facilities, rest rooms and drying rooms. The assumption made in paragraph 18.1.32 that there would be a 'minimum of 4 trips per employee' is incorrect in terms of trips on the local highway network. The construction staff will travel to and from the site on the highway network. The majority of movements by construction staff will be internal to the site and will not impact the general public. The additional mini-bus movements to transport staff to areas which cannot be reached using internal movements are outlined in the response above to paragraphs 18.1.27, 18.1.28, 18.1.29 and in the Transportation Technical Note [**REP2-041**].
		18.1.33, 18.1.34	4.8m is not wide enough to pass Damage to road edges	The Applicant has provided commitments to wheel washing facilities and conditional surveys within the Framework Construction Traffic Management Plan and Travel Plan [**REP3-013**]. Therefore, any damage that may be caused by HGVs to verges will be made good by the Applicant. The Applicant provided information regarding the highway works on Elms Road and La Hogue Road within the Transportation Technical Note [**REP2-041**] which shows where localised highway works are proposed to accommodate two-way HGV movements by widening the carriageway to over 4.8m wide. The localised widening considers the local characteristics of the highway through undertaking swept path analysis of two-way HGV movements and also considers the passing of wing mirrors of the vehicles to ensure adequate width is provided. The highway works information provided within the Transportation Technical Note will be incorporated within the update to the Framework Construction

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				Traffic Management Plan and Travel Plan that the Applicant is submitting at Deadline 3A.
		18.1.35	Overhanging vegetation	The image provided is from Google Street View and is not dated so the Applicant cannot comment on whether this is an up-to-date representation. However, the issue raised is a highway maintenance one which is the responsibility of the Local Highway Authority and will remain so regardless of whether the Scheme comes forward or not, and is therefore not a matter in relation to which it is for the Applicant to respond.
		18.1.36, 18.1.37, 18.1.38	Lack of clarity on how many HGVs will use each route	This information is provided within the Transport Assessment [**APP-117**] in Plates 2 and 3 which identifies the peak number of HGVs and the average number of HGVs along the local highway network. The assumptions made within paragraph 18.1.39 of **REP2-240** are incorrect, as the information is provided within the Transport Assessment [**APP-117**] in Plates 2 and 3 which identify up to 20 HGVs per day on Snailwell Short Road and on average 10 HGVs per day on Snailwell Short Road. During the peak construction month which relates to Sunnica West Site B, it is forecast there would be a daily peak of five HGVs on Fordham Road, however on average there is forecast to be one HGV daily on Fordham Road related to the construction of Sunnica West Site B. It is noted that the information referenced is provided as number of vehicles so to identify the number of movements the number of vehicles should be doubled.
		18.1.39	Safety concern of HGVs impact on NMUs	The Scheme has been assessed for environmental effects, including in terms of construction HGV impacts on safety and Non-Motorised Users. This is set out in the Transport and Access chapter of the ES [**APP-045**] and no significant effects were identified.
		18.1.40, 18.1.41,	Use cable route as an alternative access to West B. Requires a river crossing but that is only moderate cost and preferable to Short Road and Snailwell village.	The overall construction period is forecast for two years, which is short term, with the construction of Sunnica West Site A forecast for seven months as identified in Table 6-3 in the Transport Assessment [**APP-117**]. This information is provided within the Transport Assessment [**APP-117**] in Plate 2 and 3 which identifies the daily peak number of HGVs and the daily average number of HGVs along the local highway network. Plate 2 and 3 of the

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				Transport Assessment [**APP-117**] identify up to 20 daily HGVs on Snailwell Short Road and on average 10 daily HGVs on Snailwell Short Road. Table 13-33 in the Transport and Access chapter of the ES [**APP-045**] details that peak construction period traffic will not result in significant effects for vehicle travellers in terms of driver delay, accidents and safety. In addition, the peak construction traffic will not result in significant effects on Non-Motorised Users (NMUs) in terms of severance, pedestrian delay, pedestrian/cycle amenity, fear and intimidation and accidents and safety.
		18.1.42	General factual statements on access arrangements	The HGV route is identified within Figure 4 of the Framework Construction Traffic Management Plan and Travel Plan [**AS-300**, **AS-301**] via the Dane Hill / B1085 roundabout. The statement regarding access via Kentford is noted however this is not on the HGV route identified and therefore is not relevant to the Scheme.
		18.1.43, 18.1.44, 18.1.45	HGVs	The comment regarding the Newmarket Road/Freckenham Road junction in Worlington is noted. As a result of consultation with the local highway authority, it has been agreed that HGVs will be escorted through this junction to ensure the safe passage of the vehicle in the interest of road safety. This information is provided within the Transport Assessment [**APP-117**] in Plates 2 and 3, which identify the peak number of daily HGVs and the average daily number of HGVs along the local highway network. It is identified that there will be a peak of 17 HGVs daily on Ferry Lane (Freckenham Road) associated with Sunnica East Site A Site Access E and a peak of 14 HGVs daily on Beck Road associated with Sunnica East Site A Site Access F, whereas on average it is forecast to be eight HGVs daily on Ferry Lane (Freckenham Road) associated with Sunnica East Site A Site Access E and an average of three HGVs daily on Beck Road associated with Sunnica East Site A Site Access F. It is noted that the HGVs are forecast to occur on Beck Road over a 12-month period and not for the entire construction period. It should be noted that the peak number of daily HGVs identified in Plate 2 within the Transport

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				Assessment [**APP-117**] represent those associated with each of the site accesses.
		18.1.46 18.1.47, 18.1.48	Construction traffic through Worlington is unjustified, should use cable route.	The comment regarding the Newmarket Road/Freckenham Road junction in Worlington is noted. As a result of consultation with the local highway authority, it has been agreed that HGVs will be escorted through this junction to ensure the safe passage of the vehicle in the interest of road safety. Plate 3 of the Transport Assessment shows that an average of 11 HGVs would be travelling through Worlington to access Sunnica East Site A. Therefore, as there is an acceptable existing route to facilitate this access which does not result in significant adverse effects, a haul road is not considered to be necessary at this location.
		18.1.49	Parking control	Response is provided to 18.1.24, 18.1.25, 18.1.26.
		18.1.50	Monitoring needs to be adequately resourced	Response is provided to 18.1.15 18.1.16, 18.1.24, 18.1.25, 18.1.26.
		18.1.51	Use of internal haul roads should be maximised Short road, snailwell should be banned.	The access arrangements have been fully assessed within the Transport and Access chapter of the ES [**APP-045**] and within the Transport Assessment [**APP-117**] as well as controls, management and monitoring outlined in the Framework Construction Traffic Management Plan and Travel Plan [**AS-300**, **AS-301**]. Therefore, it is considered the forecast number of movements on the local highway network to be fully assessed and no significant impacts, in terms of EIA, were identified.
REP2-240	**Environment – BESS – Fire Safety**	14.1.12	In respect of the Outline Battery Fire Safety Management Plan, SNTS has obtained a report commenting on the safety of the scheme as originally proposed see Annex	In recognition of the concerns raised by interested parties and as part of the Applicant's commitment to incorporate the latest BESS safety standards and codes for Sunnica. The Applicant has issued an updated outline Battery Fire Safety Management Plan [**REP2-032**] and submitted it for Deadline 2. It is considered this provides a more detailed safety outline which ensures that the final design of the BESS will be acceptable and that in the unlikely event of a

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
			L to this representation. This is relevant to any subsequently issued outline plan. As necessary, SNTS will comment on that plan, although the Christensen report speaks for itself on safety matters.	fire it would be managed safely ensuring the safety of site staff, first responders and the wider community. The author of the report commissioned by SNTS (Annex L) appears to have misinterpreted the function of the original outline Battery Fire Safety Management Plan. The Applicant looks forward to receiving SNTS responses to the revised plan, and trusts there is now clarity that the specific Battery Fire Safety Management Plan will only be drafted at the detailed design stage, but will be in accordance with the outline Battery Fire Safety Management Plan. The Applicant will respond specifically to some of the comments and assumptions in the Annex L report and looks forward to engaging with SNTS on comments regarding the revised plan. The Applicant is confident that battery performance capabilities, validation testing requirements, regulatory codes and safety standards will have further improved by the time of the detailed design stage. The drafting of the outline Battery Fire Safety Management Plan means that the Battery Fire Safety Management Plan will be required to take account and adhere to these documents and so SNTS can have confidence that the BESS site will conform to the most rigorous safety standards. As stated in the updated plan, the BESS system selected for Sunnica will have completed UL 9540A testing which defines and quantifies gas emissions produced during thermal runaway. This data will then be used for specific BESS consequence modelling, if necessary, for the Sunnica site. A key priority of this modelling is to ensure that respondent exposure to any level of emissions from a BESS thermal runaway incident are minimised and the ERP provides clear alert protocols and safety guidelines. The plan also confirms that suppression system performance capability and BESS safe spacing distances will be established through UL and / or 3rd Party fire & explosion testing. Firefighting water requirements and bunded lagoon capacities will be agreed with the lead Fire & Rescue Service at the detailed design stage and will be informed by this key test data. The Applicant confirms that an independent fire protection engineer will review the firefighting water supply proposals.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				The Applicant's BESS fire safety team has studied many of the global BESS incident reports to help inform red flags for the Sunnica BESS design template and to establish key safety protocols to inform drafting of Emergency Response Planning (ERP) documentation at the detailed design stage.
		14.1.13	Safety mitigations required will impact planning balance.	The BESS design selection process has not started but effective mitigation solutions must be integrated into the internal container construction and appropriate equipment spacing configurations will have been established from 3rd party fire & explosion testing. Mitigation solutions are not expected to have a visual impact.
		14.1.14 14.1.15	HSC implications	The Applicant updated the examination at Deadline 2 in respect of the need for any hazardous substances consent. Please see **REP2-016**.
		2	ANNEX L report – comment on Executive Summary	The author of the SNTS report is commenting on the original outline Battery Fire Safety Management Plan submitted as part of the DCO Application in November 2021. A revised version of the plan was submitted for Deadline 2 and this revision contains indicative BESS layouts for the Scheme. The Applicant is confident that battery performance capabilities, validation testing requirements, regulatory codes and safety standards will have significantly improved by the time of the detailed design stage once consent is granted. Selecting a specific BESS design at the consenting stage would not be a sensible decision as there are many new BESS safety codes and standards due for implementation in 2023-24. Ultimately, BESS safety is a systems approach and the Applicant will produce a detailed Battery Fire Safety Management Plan at the detailed design stage that encompasses all key BESS system and site design mitigation and safety requirements.
		3-3.5 3.7	Annex L comments RMM17 (gas detection & ventilation)	The updated outline Battery Fire Safety Management Plan [**REP2-032**] has identified red flag BESS design features that will not be accepted at the detailed design stage. The Applicant is very aware of the impact of BESS container design and site layout safety implications. The BESS fire safety team has studied global BESS

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				incident reports to help inform red flags for the BESS design template for the Scheme and to establish key safety protocols to inform drafting of Emergency Response Planning (ERP) documentation at the detailed design stage. The revised outline Battery Fire Safety Management Plan [**REP2-032**] includes site indicative drawings for the Scheme, which integrate fire brigade observation points, access roads and multiple BESS site entry / exit points. All relevant Fire & Rescue Services (FRS) will be consulted on site indicative designs and feedback will be used to finalise FRS facilities and infrastructure for the Scheme. BESS ventilation systems are a key safety feature for any lithium-ion BESS system. BESS ventilation and gas exhaust systems will be validated during UL 9540A testing and / or 3rd party fire and explosion testing. As a minimum the exhaust system will conform to NFPA 69 explosion prevention standards as referenced in the outline Battery Fire Safety Management Plan. The BESS fire suppression system must be able to operate effectively in conjunction with the ventilation / gas exhaust system. NFPA 69 exhaust rate is designed to keep gas level under 25% of LFL (Lower Flammable Limit) and exhaust gases away from BESS openings. Controlled and automatic removal of flammable gases protects first responders and toxic gases are removed in a controlled way allowing for dispersion modelling to be reliably integrated into Emergency Response Planning (ERP).
		3.6	Item 3 - modelling	As stated in the updated outline Battery Fire Safety Management Plan [**REP2-032**] the BESS system selected for Sunnica will have completed UL 9540A testing which defines and quantifies gas emissions produced during thermal runaway. This data will then be used for specific BESS consequence modelling, if necessary, for the Scheme at the detailed design stage. A key priority of this modelling is to ensure that respondent exposure to any level of emissions from a BESS thermal runaway incident are minimised and the Emergency Response Plan provides clear alert protocols and safety guidelines.
		3.6 3.7 RMM17	Item 7 – fire detection and fire suppression systems	As stated in the updated outline Battery Fire Safety Management Plan [**REP-032**], the BESS fire protection design for the Scheme will follow NFPA 855 (2023) code. NFPA 855 identifies recommended detection products for BESS which includes a range of gas monitoring equipment.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				As best practice, a range of NFPA recommended products will have been performance tested on the BESS for the Scheme design during UL 9540A / 3rd party testing and certification. The most effective suite of detection products will be identified and integrated into the BESS design. NFPA 855 (2023) also defines minimum system monitoring capabilities which the Sunnica BESS system must comply with, this data should be made available to site operatives and first responders. The Applicant can confirm that the selected water suppression system design must be capable of operating in conjunction with a BESS gas exhaust / ventilation system. Exhausting flammable & toxic gases is a primary safety priority for the Scheme, this ensures safety of first responders and reduces the risk of BESS deflagration events. As specified in the revised outline Battery Fire Safety Management Plan the water-based suppression system should be specifically tested with the BESS design during UL 9540A test (unit or installation level) and / or 3rd party fire & explosion testing. The 3rd party fire & explosion testing should provide free burn data which will be used to quantify suppression system performance capabilities. The Applicant's Battery Fire Safety Team is aware of a variety of water or aqueous agent suppression systems undergoing significant scale testing. Some system designs offer direct access to BESS battery modules and battery racks which may offer a more effective alternative to standard BESS enclosure water sprinkler, mist, or deluge systems.
		3.6	Item 19 – BESS design	The revised outline Battery Fire Safety Management Plan [**REP2-032**] provides more information on BESS safety design features which will be integrated. It should be noted that the detailed design stage for the Scheme is still some way off and will not take place during the DCO process. The Applicant recognises that BESS system safety standards, codes and testing requirements are rapidly becoming more rigorous and does not want to specify a system design at this stage in the expectation that improved performance capabilities combined with increased safety and mitigation features will offer better options for Sunnica moving forward.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				At the final detailed design stage, a definitive Battery Fire Safety Management plan will be drafted to address the specific BESS design and site layout safety and mitigation requirements.
		3.6 3.7	Item 21 - Thermal barriers and fire separation RMM01	The indicative BESS design plans which are included in the revised outline Battery Fire Safety Management Plan [**REP2-032**] allows 6 metres spacing between BESS and ESS equipment. This default safety spacing was derived from FM Global recommendations and consultation with the UK National Fire Chiefs Council. It is specified in the revised plan that if spacing is to be reduced then the BESS supplier will provide UL 9540A test data which covers gas production and fire data from cell through to system level, this will be used as inputs for specific BESS system modelling. Safe BESS spacing should be conclusively validated during UL 9540A testing and / or 3rd party fire & explosion testing, it is preferred that free burn test data should be supplied. NFPA 855 (2023) standards are also specified in revised outline Battery Fire Safety Management Plan, this code stipulates that BESS internal thermal insulation barriers must provide a minimum of 1-2 hours protection.
		3.6	Item 26 - Firefighting water requirements	It must be noted that the original outline battery fire safety management plan is only a provisional manual firefighting water requirement agreed with the lead Fire & Rescue Service (FRS) for inclusion in the indicative BESS site plan for the Scheme. When the BESS detailed design process starts performance-based water requirements will be confirmed with the FRS and validated by an independent fire protection engineer. These requirements can be defined from analysis of the BESS system UL 9540A testing and / or 3rd party fire & explosion test data which evaluate structural integrity, safe spacing distances for BESS equipment and automatic suppression system performance. These standards are referenced in Table 4 of the revised outline Battery Fire Safety Management Plan [**REP2-032**]. NFPA 855 (2023) defines minimum BESS system monitoring capabilities which the Sunnica system must comply with, this data will be made available to site operatives and first responders to inform Emergency Response operational tactics.

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		3.8	Report conclusions	Table 4 of the revised outline Battery Fire Safety Management Plan [**REP2-032**] references current applicable safety standards for Sunnica. These will be updated at the detailed design stage to ensure compliance with the latest BESS standards and codes.
		4	Review of Chapter 16 (in particular Appendix 16D)	As set out in Appendix 16D, information for detailed modelling is not available at this stage of the process. The technology is fast-moving and is evolving in response to the incidents raised by the author. As such detailed consequence modelling will be undertaken, if necessary, once the detailed design is known. The dispersion modelling undertaken in Appendix 16D is a worst case based on a number of reasonable assumptions set out in the report. HF is the main pollutant of concern. As set out in Appendix 16D, other pollutants, while emitted from a BESS fire, are not emitted in concentrations sufficient to cause impacts outside of the application boundary. As set out in Appendix 16D, the total size of the BESS is not relevant. In the event of equipment failure causing a fire, the fire would spread from rack to rack. Once the store of pollutants of concern have been released, there will be no further emissions from the rack. A conservative estimate of 5 racks burning at once time has been made. This does not mean that the fire cannot spread throughout the entire BESS, but it does determine the maximum hourly release of emissions. The modelling undertaken in Appendix 16D has taken a worst case approach of assuming no thermal buoyancy to the emission, thus the expected temperature raised is not relevant.
REP2-240	**Environment – BESS**	12.1.25. and 13.1.17	The scheme is 'highly battery lifetime dependent' (para 6.3.6). It is also worth noting that the battery emissions are calculated using Sunnica's own figures (see para 3.3.1). That figure gives a GHG benchmark measured against kWh; thus, for the figures discussed at the draft DCO hearing (where the figure of 2	The MWh rated capacity does not affect the assessment of impacts and therefore the Applicant argues it is not needed to determine the application. The MWhrs rated capacity is not an input to the assessment of effects, except for calculating embodied carbon. Paragraph 6.3.3. of Chapter 6 Climate Change of the ES [**APP-038**] notes: "The assessment of embodied carbon is … based on a BESS that is able to supply the grid at an assumed 400 MW for four hours, for a total capacity of 1,600 MWh, which is the chosen capacity illustrated in the Concept Design. The BESS capacity is not limited by the Design Principles but increasing the peak power capacity of the BESS would reduce the number of battery cubes and increase the number of inverters and transformers within the BESS compound, which (due to the amount of embodied carbon in each

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
			GWh was discussed using C4 batteries) the carbon emissions may be even higher. It is only in exceptional circumstances that no batteries would be replaced.	component) would in turn lower the embodied emissions. It is therefore not expected that there would be a worse scenario than the battery arrangement that has been assessed in the chapter; other configurations are expected to have the same or lower embodied carbon." An allowance has been made for replacement of BESS inverters and other infrastructure such as batteries in the carbon calculations. Further detail on this in response to comments from Cranfield University are provided in this document under the climate change section.
REP2-240	**Environment – BESS**	3.1.6.	Assessment of the proposed BESS and substation compounds has been inadequately considered, there has been no attempt given to lay out the compounds so as to minimise landscape and visual impacts.	Chapter 10 Landscape and Visual Amenity of the ES [**APP-042**] provides an assessment of impacts of the project on landscape and visual amenity. BESS is specifically mentioned as described below. Paragraph 10.7.4 of the Landscape and Visual assessment explains design principles have been incorporated across the Sunnica East Sites A and B by: • Siting the BESS in E33 adjacent to reservoirs and Lee Farm, so that its massing and land uses are perceived in the context of existing infrastructure features and built structures in the landscape. • Siting the BESS in E18 so that it is enclosed and screened by existing woodland along its northern edges and in part by roadside vegetation adjacent to Elms Road to its south-east. • The tonal rendering of shades which are suitable to integrate within the landscape will help reduce the perceived overall mass of these structures, secured via the OEMP [**REP2-030**]. And with regards to Sunnica West Site A and Sunnica West Site B by: • Siting the BESS within W17, so that it is in part adjacent to existing barns and bordered by the mature woodland of Sounds Plantation which aids in screening the structures from the west and in views from the east, their suitable rendering in the context of the woodland, to aid in reducing the perceived overall massing of the structures.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				The Landscape and Visual assessment does not identify any significant landscape or visual effects associated with BESS. Effects are summarised as follows: • There will be some changes in landscape and visual effects during construction associated with clearance and works for the BESS. • For Year 1 of operation, paragraph 10.8.194 identifies there would be middle distance views of the upper parts of the BESS in Sunnica East Site A for recreational users along part of the River Lark, motorists on East Fen Road, and residents in East End. Paragraph 10.8.195 identifies the upper parts of the BESS in E33 would be visible at close range for motorists travelling along Ferry Lane. The massing of the BESS would be softened by their tonal rending, but the structures would represent a noticeable change in the composition of views in Year 1. • For Year 1, the upper parts of the BESS would be visible to the north of the Elms in Sunnica East Site B • For Sunnica West Site A, Year 1 effects would be softened by their tonal rendering and siting adjacent to Sounds Plantation, to provide a degree of enclosure in relation to the wider landscape to the south, across the Limekilns. Paragraph 10.8.256 identifies that from within Chippenham and Chippenham Park, the BESS across the Sunnica West Site A would not be visible, due to the intervening buildings and mature woodland and boundary wall along the edge of the Park. Paragraph 10.8.257 identifies that the upper parts of the BESS would be visible, although their massing would be softened by their tonal rendering and that they would be seen against the backdrop of Sounds Plantation. • In Year 15, paragraph 10.8.320 notes that the new tree planting would have established along the eastern edges of E02, E04, E08, E10 and E33, to reinforce the existing pattern of roadside vegetation and increase the enclosure of the BESS in E33 and reduce their perception from the wider landscape.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				• The visibility of the upper parts of the BESS and solar stations in E01 to E05 would be substantially reduced by the establishment of the proposed planting around the edge of E05 and adjacent to E01 by Year 15, in relation to views from recreational users along the River Lark and motorists on East Fen Road and Sheldrick's Road for Sunnica East Site A. Views would also be screened in relation to views from motorists travelling along Ferry Lane, by the establishment of the proposed trees above the roadside hedgerow. • BESS in Sunnica East Site B in Year 15 would be enclosed by the combination of the proposed tree planting within E18 and the existing trees to the north of the parcel. The planting would enclose the solar panels, BESS and substation to a greater degree than compared to year 1 and reduce the adverse impacts to the aesthetic value of the landscape and the perception of the Scheme. • Paragraph 10.8.380 notes that centrally within the Sunnica West Site A, the establishment of the woodland bordering W17 would enclose the BESS and aid in reducing their perception in Year 15. As per the year 1 assessment, the BESS across the Sunnica West Site A would not be visible due to the intervening buildings and mature woodland and boundary wall along the southern edge of Chippenham Park.
REP2-240	**Environment – BESS**	3.1.8.	The photomontage submitted with the ES underrepresents the impact of the development. There has been an inappropriate selection of the location and viewing direction of photomontages, as has been apparent on the accompanied site visits. Key views have been omitted. The BESS infrastructure has been inappropriately depicted, and the baseline images are	The baseline photography and photomontages have been produced in accordance with the Guidelines for Landscape and Visual assessment (GLVIA3). The viewpoints were agreed with the host authorities prior to the assessment and are considered representative of local views. The growth rates for vegetation are also taken from industry guidance. The methodology is discussed in Chapter 10 Landscape and Visual Amenity [**APP-042**] and its associate methodology [**APP-102**].

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			awkwardly presented. The growth rates used for mitigation planting shown are overoptimistic.	
REP2-240	**Environment – BESS**	12.1.13 and 13.1.22	The policy considerations which indicate in favour of the construction of BESS in the UK (which SNTS accepts is indicated) does not provide justification for the co-location of BESS with solar.	The Applicant is satisfied that the BESS co-located with the solar PV provides an additional benefit to the national grid that is otherwise missed if it is not included as part of the Scheme. The Statement of Need [**APP-260**] explains the Applicant's reasoning for this in further detail.
REP2-240	**Environment – BESS**	13.1.2. and 13.1.26	The available power and capacity of the BESS will far outstrip the normal operating generation of the PV cells. In respect of the use of the BESS, SNTS say that the BESS will be used for a host of purposes outside of those directly related to the electricity generated by the PV cells. As a result, SNTS say that the BESS cannot currently be considered to be associated development for the Planning Act 2008, and cannot be justified on the need basis advanced by the applicant. Even if the scheme were to store all energy generated in a day (which would mean the grid connection was entirely unutilised for that period), it is	The Applicant has set out the reasons it considers that BESS is associated development in its Deadline 2 submissions [see **REP2-038**]. The Applicant appreciates that this is a matter that will be further considered at the upcoming hearings and, if required, can be further explored as part of future submissions into the Examination.

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			unlikely the 3,110 MWh could be filled	
REP2-240	**Environment – BESS**	13.1.11	BESS is not 'needed' in the sense of inclusion of BESS in the scheme being a necessity. However, it may well be desirable (see also [**APP-020**, para 2.4.5] quoted below, which notes that the solar farm is not dependent on the BESS).	The Applicant agrees that the solar PV can operate without BESS, but it is considered that BESS is needed because of the significant increase in renewable energy supply required to meet the Government's legally binding Net Zero targets. This is explained in the Statement of Need [**APP-260**]. The response to the ExA's first written questions [**REP2-038**] also further explains the Applicant's reasoning.
REP2-240	**Environment – BESS**	13.1.30.	In SNTS's submissions prior to the ISH on the draft DCO [ref], a number of questions were set out.	The BESS will not exceed 500MW export capacity.
REP2-240	**Environment – BESS**	13.1.45 and 14.1.11 and 24.1.7.	SNTS is of the view that the applicant should provide a draft which proposes some constraint on the power, capacity, or use of the batteries. For example, the Little Crow scheme limited the power of the BESS in the DCO to 90 MW (appendix 4 – Schedule 1, definition of Works 2A and 2B13).	As noted in the Written Summary of the Applicant's Oral Submissions at the Development Consent Order Issue Specific Hearing on 1 November 2022 [**REP2-036**], the Applicant is, in principle, open to exploring an upper limit on BESS power through the Examination. The Applicant is aware that this matter will be considered further at the upcoming hearings and, if required, can be further explored as part of future submissions into the Examination.
REP2-240	**Environment – BESS**	13.1.46	SNTS propose that the draft DCO could limit the BESS in the following ways: a. Power: 'The BESS within the scheme shall not exceed [XXX] MW of	As noted in the Written Summary of the Applicant's Oral Submissions at the Development Consent Order Issue Specific Hearing on 1 November 2022 [**REP2-036**], the Applicant is, in principle, open to exploring an upper limit on BESS power through the examination. The Applicant is considering this comment and, where acceptable to the Applicant, will include such amendments in the updated version of the draft

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
			power output as calculated by the sum of the stated power output on any included battery cells.' b. Capacity: 'The BESS within the scheme shall not exceed [XXX] MWh of capacity as calculated by the sum of the stated capacity on any included battery cells.' c. Use: 'The BESS within the scheme shall only be charged using power generated by the principal development constituted by Works No. 1.' d. The land available to Works No. 2 could also be altered to constrain the available land for BESS.	DCO submitted at Deadline 4. Where proposed changes are not acceptable to the Applicant, it will explain why at Deadline 4.
REP2-240	**Environment – BESS**	13.1.47	A restriction on use should limit the BESS to a use associated with the PV cells.	Restricting the BESS so that it cannot import electricity when there is a surplus on the grid would not deliver the full benefits of the BESS as outlined in the Statement of Need [Section 11, **APP-260**] and the Planning Statement [**APP-261**]. Importing energy from the grid will not alter the environmental impacts of the Scheme in the local area, and such a restriction would neither be necessary nor reasonable.
REP2-240	**Environment – BESS**	14.1.5	The issue of the introduction of the BESS engages all of those difficulties about 'good design' that SNTS has flagged about the scheme overall	The Applicant has responded on good design at Deadline 1B. To summarise, the Design and Access Statement [**APP-264**] explains that DC coupling was not taken forward because it was considered better from a landscape and visual perspective to develop BESS compounds in fewer locations, which could be more easily screened (Paragraph 3.5.14).

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				Paragraph 3.5.15 bullet a explains that the height of the BESS was reduced from the 10m propose originally to 6m. Paragraphs 3.5.18 explains how the BESS was located to minimise views of it, specifically: **Sunnica East Site A and Sunnica East Site B** a. Siting the primary construction compound, BESS and substation in E33 adjacent to reservoirs and Lee Farm, so that their massing and land uses are perceived in the context of existing infrastructure features and built structures in the landscape. b. Siting the BESS and substation in E18 so that it is enclosed and screened by existing woodland along its northern edges and in part by roadside vegetation adjacent to Elms Road to its south-east. **Sunnica West Site A and Sunnica West Site B** a. Siting the primary construction compound and the BESS and substation within W17 at Sunnica West Site A, so that it is in part adjacent to existing structures (agricultural barns which are to be retained) and bordered by the existing mature woodland which aids in screening the structures from the west and in views from the east. In terms of appearance, the Applicant committed, at this stage, to proposing tonal rendering using shades which would integrate the structures in the context of the woodland, to aid in reducing the perceived overall massing of the structures. Paragraph 3.6.7 explains the changes made by the design team following feedback at statutory consultation, including at Sunnica East Site A the BESS/substation location has been realigned to be set back from Ferry Lane and provide a new archaeological offset following results from an intrusive investigation of this area.
REP2-240	**Environment – BESS**	14.1.6	The applicant should consult with HSE at the pre-application stage.	A copy of the Outline Battery Safety Management Plan was shared with the HSE prior to submission and the Applicant has updated the DCO submitted at Deadline 2 to include a requirement for the relevant planning authorities to

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				consult the HSE prior to approval of the battery safety management plan pursuant to requirement 7.
REP2-240	**Environment – BESS**	14.1.9	While government policy does support the construction of BESS, that policy does not indicate its support specifically for co-location.	Government policy does not seek to specify the location of BESS but it does provide general support for delivery of BESS and the draft NPS EN-3 does specifically refer to collocation with solar.
REP2-240	**Environment – BESS**	14.1.17	The policy justifications for a large capacity BESS are significantly less than small BESS connected to a PV site (or a large BESS situated on brownfield land). Thus, SNTS say that this should negatively weigh against the scheme in the planning balance.	The Applicant respectively disagree with this statement. The Statement of Need [Section 11, **APP-260**] and Planning Statement [**APP-261**] adequately demonstrate the policy justification for the BESS as part of the scheme.
REP2-240	**Environment – BESS**	16.1.23	From an expense and embedded carbon perspective, it is of note that BESS has not been included (para 9.3.10). For the reasons advanced in Annex F the batteries included in the Sunnica scheme have a significant negative impact on embedded carbon.	The BESS is included in embedded carbon calculations. Paragraph 6.3.3. of Chapter 6 Climate Change of the ES [**APP-038**] notes: "The assessment of embodied carbon is … based on a BESS that is able to supply the grid at an assumed 400 MW for four hours, for a total capacity of 1,600 MWh, which is the chosen capacity illustrated in the Concept Design. The BESS capacity is not limited by the Design Principles, but increasing the peak power capacity of the BESS would reduce the number of battery cubes and increase the number of inverters and transformers within the BESS compound, which (due to the amount of embodied carbon in each component) would in turn lower the embodied emissions. It is therefore not expected that there would be a worse scenario than the battery arrangement that has been assessed in the chapter; other configurations are expected to have the same or lower embodied carbon." Paragraphs 6.311 and 6.3.12 of this chapter quantify the embedded carbon.
REP2-240	**Environment – BESS**	18.1.8	The intent of Sunnica is to commission the BESS at the end of the first 8 months and to start energy trading from the	The Applicant has not devised a detailed construction or commissioning programme at this stage. The construction programme presented in the Application is designed based on a worst case programme in terms of maximum

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			national grid while the solar PV is installed over the remaining 16 months.	impacts such as road trips. The Applicant does not currently intend to start energy trading ahead of commissioning solar PV.
REP2-240	**Environment – BESS**	L30.	Sunnica were asked during a meeting if we could at least see a copy of the indicative layouts of the BESS compounds. Nothing has been received.	These indicative layouts were submitted at Deadline 2 and form part of the revised outline Battery Fire Safety Management Plan [**REP2-032**]
REP2-240	**Environment – General ES**	15.1.4 to 15.1.12.	The consideration of decommissioning as part of the scheme is a limited one. While a Framework Decommissioning and Environmental Management Plan is provided [**APP-125**] this is confined solely to environmental impacts of deconstruction and restoration. Further, it is in outline and provides no sufficient assurance as to the quality of decommissioning and crucially the return of the land to agriculture. SNTS say that unless the land is returned to agriculture, excluding any ecological and landscape mitigation areas, then the use cannot be considered by the ExA to be temporary. If the use is not temporary, then the	The Framework DEMP [**REP2-028**] submitted at Deadline 2 states: *Landscape and ecology mitigation will be left in situ following decommissioning; however, the Scheme will be returned to the land owner in a condition where the previous farming activities, those undertaken prior to construction, could be undertaken*. This is secured through Requirement 22 of the Draft DCO [**REP2-012**], which requires the undertaker to prepare a detailed DEMP (or DEMPs, as appropriate) that is substantially in accordance with the Framework DEMP. Any detailed DEMP must be approved by the relevant local planning authority (or authorities). The Applicant will therefore be obliged to return the land to the landowner in a condition where previous farming activities could be undertaken (noting that the Applicant has no control over what landowner does with the land following decommissioning). The Soils Management Plan outlined in the Framework CEMP [**REP3-015**], Framework OEMP [**REP2-030**] and Framework DEMP [**REP2-028**], will ensure that agricultural soils are protected throughout the life of the Scheme. 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 detailed CEMP(s), OEMP(s) and DEMP(s). The SMP will provide guidance on handling of soil material, specific to the soil resource present. This will serve to conserve both soil volume and functional capacity for beneficial reuse, from the small areas where soil will be stripped during construction. The SMP will also cover the establishment of permanent

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			harm must be considered permanent harm. Thus, currently, the scheme lacks a general decommissioning plan (even in a framework form) and does not have parameters against which successful decommissioning will take place. Such a plan is crucial as, currently, the ExA cannot be satisfied that decommissioning will return the site to its prior nature and use. It can only be satisfied that this will be done from an environmental perspective in compliance with the Framework Decommissioning and Environmental Management Plan. First, there is insufficient requirement to return the land to the pre-existing use. For much of the site this includes agricultural land of high quality. Whether or not SNTS's case on the land being broadly BMV is accepted (which is addressed elsewhere), this land is valuable in the range of crops that it can grow and the yields it can produce. To not	green cover at the suspension of arable cropping that will remain in place for the duration of the solar farm construction, operation, and decommissioning. In addition to protecting the soil surface from damage, this green cover will be a forage crop for grazing by livestock. For the operational phase 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 and cause 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 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. Please refer to Defra R&D Best Practice for Managing Soil Organic Matter (SOM) in Agriculture – SP08016 (Defra, 2008).The Framework DEMP [**REP2-028**] submitted at Deadline 2 also requires all equipment located on the Sites to be removed and recycled or disposed of in accordance with good practice at the time; however, the cables along the cable route and the Burwell National Grid Substation Extension, if required, will remain in situ following decommissioning, unless legislation at the time requires otherwise. The cables within Grid Connection Route A and B will be buried up to 3m below ground level and will not prevent agricultural use of the land during operation or post decommissioning. The Applicant considers that the Framework DEMP is sufficient to deliver a full decommissioning of the Scheme.

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			secure such a return is to fail to meet the aims of the Government's Food Strategy (published 13 June 2022). Secondly, it is unclear from the information available that the decommissioning will secure the complete removal of all elements of the scheme (save for those permanent elements related to environmental mitigation). Indeed, while para 2.1.1 of the Framework Decommissioning and Environmental Management Plan [**APP-125**] refers to such equipment being removed, it does not go on to say what this will include. For the same reason as has been identified for land use, the ExA must be satisfied that the site will actually be returned to its prior state. It would be inappropriate and a permanent change to the site to leave (for example) below ground structures in place. It is imperative that there is clarity about this issue to avoid differences of opinion in 40 years' time. Thirdly, it is imperative that there is clarity about this issue.	

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			Most people involved in developing this application and drafting the DCO will not be available in 44 years' time to advise on what is meant by decommissioning. It should not be left to a future generation to try and enforce what was meant in the DCO when this is not explicitly set out. If the development is temporary then it should be clearly defined, in the context of the Works consented by the DCO, what is temporary and is to be completely removed and the land reinstated to its previous use and condition at the end of the consenting period, and what is permanent as it will remain at the end of the consenting period and is change of use that is permanently consented.	
		15.1.13 to 15.1.16	The Outline Plan [**APP-125**] refers to all equipment being removed and recycled, but there is no definition of what comprises equipment. A common understanding would be that it would include such items as PV arrays,	The Framework DEMP [**REP2-028**] submitted at Deadline 2 requires all equipment located on the Sites will be removed and recycled or disposed of in accordance with good practice at the time; however, the cables along the cable route and the Burwell National Grid Substation Extension, if required, will remain in situ following decommissioning, unless legislation at the time requires otherwise. The Framework DEMP also states that *Landscape and ecology mitigation will be left in situ following decommissioning; however, the Scheme will be returned to the land owner in a condition where the previous farming activities, those*

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			transformers, switchgear, inverters, cables and the like. By common understanding equipment SNTS says equipment would not comprise concrete bases, foundations, access roads, hard-standings, and buildings. There is a reference to the cables to Burwell remaining in-situ which indicates that it is not in the applicant's mind to remove all items from the site. It should not be taken that by default that a cable remaining means that everything else is removed. SNTS refers the ExA to the Outline Decommissioning Strategy for Little Crow Solar Park15 which does contain details of decommissioning activities in outline to be developed. These take the form of brief method statements setting out the approach to be taken. SNTS does not disagree that detailed method statements will need to be prepared before commencing decommissioning. SNTS only says that more detail on	*undertaken prior to construction, could be undertaken*. This is secured through Requirement 22 of the Draft DCO [**REP2-012**]. The Applicant will therefore be obliged to return the land to the landowner in a condition where previous farming activities could be undertaken. This would necessarily include the removal of all above ground infrastructure not consistent with such agricultural land use. It is not considered appropriate to provide method statements for the decommissioning phase at this stage, as there is a high degree of uncertainty regarding the methodology that will be adopted at decommissioning. This is because engineering approaches and technologies are likely to change over the operational life of the Scheme.

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			decommissioning is needed in this application for the ExA to be satisfied that the use is truly temporary and that it can and will be fully restored to agriculture.	
		15.1.22 to 15.1.32	The only reference to recycling is in DEMP 2.8 and Table 3-11 and then only as separation of waste streams for recycling or disposal at a waste facility. While goals are referred to it is not clear what these goals are. As solar panels are made from a wide range of materials they require to be disassembled, a labour-intensive process. Currently only 10% of solar panels in the US are recycled. It should be noted that, aside from the issue of GHG emissions, appropriate recycling and disposal of the products used on site is important to understand and estimate to obtain the overall impact on the environment. While SNTS do not assess this matter due to the limited information available, SNTS notes that safe disposal of PV modules and batteries can be	A decision on the end use of the panels will be taken prior to decommissioning. Should they still be productive there would be the option of resale or donation of panels to other end-users. Where resale or donation is not feasible, solar panels will be recycled in accordance with relevant legislative requirements and good practice at the time of decommissioning. A Framework Decommissioning Environmental Management Plan (DEMP) is provided with the application in Appendix 16E of the Environmental Statement [**REP2-028**]. The core waste management principles and the final DEMP must be substantially in accordance with the Framework DEMP. 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). The principles of prevention, reuse, recycle, recover and disposal as defined in the 'Waste Hierarchy' will be embedded within the DRMP, which is a requirement in the Framework DEMP (see paragraph 2.8 and Table 3-11). Pursuant to Requirement 22 of the draft DCO [**REP2-012**], the Applicant must submit the final DEMP to the relevant planning authorities for approval prior to decommissioning. It is expected that, where possible, the solar panels will be able to be readily recycled in the UK at the time of decommissioning (40 years ahead). Recycling solar PV infrastructure is an emerging industry as the current solar farms are reaching an age where they need to be decommissioned. The technology already exists in UK and Europe to recycle panels, and it is expected that recycling technology for solar equipment will be far more developed in the UK in over 40 years' time (when decommissioning is due to begin) than it currently is. Technology already exists in UK and Europe to recycle the mounts, panels, inverters, and other infrastructure on solar farms. At present, RecycleSolar is

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			difficult, costly, and damaging to the environment. Sunnica have said they do not want to go into detail about decommissioning and recycling as 40 years on, everything will have changed and they do not want to be restrained from using newer more efficient technology, however the lack of detail means the ExA cannot reliably assess the full impact of the development. The US Environmental Protection Agency refers to reuse of solar panels for secondary purposes once no longer suitable for grid generation. Overall, the DEMP is extraordinarily weak on commitments to recycling and reuse at end of life with an attendant risk that recycling doesn't happen. The wording of the Requirement and the framework DEMP does not secure recycling, does not obligate recycling, and leaves the issue of waste from decommissioning of this scheme to a future generation.	the only UK based solar panel recycling service, but more companies are expected to setup in the next decade as the current solar farms begin to be decommissioned. Technology removed prior to the end of the Scheme's operational life will also be recycled as far as possible and will undergo the same process as outlined above.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
			It is not clear how the DEMP establishes this circular economy by only focusing on the end stage of decommissioning. The yet to be developed Decommissioning Resource Management Plan (DRMP) will set goals and how waste streams will be identified. SNTS says that these goals should be stated now and must inform the design process to ensure that when decommissioned recycling rather than disposal can be maximised	
		15.1.26	The DCO should include a Requirement that in the event of the consented facility ceasing to generate electricity then after a period of not more than 2 years decommissioning is automatically triggered.	The Applicant is considering this comment and, where acceptable to the Applicant, will include the amendment in the updated version of the draft DCO submitted at Deadline 4. Where proposed changes are not acceptable to the Applicant, it will explain why at Deadline 4.
		15.1.33 to 15.1.44	SNTS considers that the current drafting of Requirement 22 in the draft DCO contains shortfalls, specifically that it does not expressly require the land to be restored to a condition suitable for agriculture following	The Applicant is considering this comment and, where acceptable to the Applicant, will include the amendment in the updated version of the draft DCO submitted at Deadline 4. Where proposed changes are not acceptable to the Applicant, it will explain why at Deadline 4.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
			decommissioning. SNTS propose the following revisions to Requirement 22 (on a without prejudice basis): (1) Not less than 6 months before the 40th anniversary of the first export date or within 6 months of the 2nd anniversary of the authorised development ceasing to generate electricity, a decommissioning and site restoration scheme together with a decommissioning and restoration environmental management plan must be submitted to the local planning authorities for their approval. The decommissioning and site restoration scheme(s) must be in accordance with the outline decommissioning strategy. (2) The decommissioning and site restoration	

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			scheme(s) must include provision for—(a) removal of all above and below ground elements of the relevant parts of the authorised development, (b) removal of any cabling below ground level; (c) restoration of the areas disturbed by the relevant part of the authorised development; (d) re-grading and levelling and (e) restoration of the land to agriculture.; except as agreed with the local planning authorities. (3) The scheme and plan submitted and approved pursuant to sub-paragraph (1) must be substantially in accordance with the relevant part of the framework decommissioning environmental management plan and the outline scheme for	

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
			decommissioning and restoration. (4) The scheme and plan submitted and approved pursuant to sub-paragraph (1) must include a resource management plan that includes details of proposals to minimise the use of natural resources and unnecessary materials. (5) No decommissioning or restoration works must be carried out until the relevant planning authority or both relevant planning authorities (as applicable) has or have approved the plan submitted under subparagraph (1) in relation to such works. No decommissioning works must be carried out until the relevant planning authority or both relevant planning authorities (as applicable) has or have approved the scheme	

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
			and plan submitted under subparagraph (1) in relation to such works. (5) The plan submitted and approved pursuant to sub-paragraph (1) must be implemented as approved. (6) The scheme and plan submitted and approved pursuant to sub-paragraph (1) must be implemented as approved.	
REP2-240	**Glint and Glare**	21.1.2	SNTS notes that only one receptor on the Limekilns has been modelled (Figure 9 [**APP-121**]) and this receptor does not appear to be the most sensitive receptor as views of Sunnica West A are possible further east along Wellbottom. Indeed, SNTS would say that there is a greater exposure to Sunnica West A than from the receptor used.	The receptor position is chosen to provide a representative location of potential impacts based on professional judgement by a qualified expert. It is agreed that there are views at different locations within the Limekiln Gallops; however, the location chosen provides a representative point to determine potential glint and glare effects due to the orientation and positioning of the solar panels within Sunnica West A.
REP2-240	**Glint and Glare**	21.1.3	There are no receptors on Railway Field despite views of West A being possible.	The Railway Field is located to the north of Limekilns, the assessment of Limekilns is considered to be a representative location.

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REP2-240	**Glint and Glare**	21.1.4	The risk to racehorses being startled by a glint or glare is acute on both the Limekilns and Railway Field and a more comprehensive assessment should have been done. The risk of injury to horse and/or rider in the event of a bolt has both welfare and cost implications that are significant.	The assessment of Geometric Calculations, Table 7.11 of the Glint and Glare Assessment [**APP-121**] determined that no solar reflection is geometrically possible from the Limekilns and therefore no impacts are possible as a result of glint and glare.
REP2-240	**Glint and Glare**	21.1.5	SNTS queries the receptor on Long Hill Gallops in Figure 9 [**APP-121**] given that this location has no visibility of Sunnica. The assessment at 7.11 in [**APP-121**] is challenged as no refection possible is stated on the basis of a single receptor.	It is agreed that there is no visibility of the Scheme from Long Hill Gallops; however, this receptor was included in the assessment to ensure a robust assessment of glint and glare was undertaken. As noted above, a receptor is identified to be representative of the potential impacts, this is based on professional judgement of a technical specialist.
REP2-240	**Glint and Glare**	21.1.6	Glint and glare are also a major consideration for recreational riding in the area, and Baldingham lane is a good example where panels are shown on both sides of the lane making it dangerous for riding.	The Glint and Glare Assessment [**APP-121**] concluded that reflections from the PV panels to the receptors (including pedestrians and riders using PRoW [including Badlingham Lane]) during operation of the Scheme 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 [**REP3-011**].

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
REP2-240	**Funding**	19.1.1 to 19.1.2	SNTS has significant concern over the ability of Sunnica Ltd to fund the development and discharge financial obligations such as compensation to be paid to landowners whose land may be compulsorily acquired. In this context SNTS refers to the Planning Act 2008 – Guidance Relating to the Compulsory Acquisition of Land21 paragraph 18. *Applicants should be able to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition within the statutory period following the order being made, and that the resource implications of a possible acquisition resulting from a blight notice have been taken account of.*	Article 43 of the draft DCO [**REP2-012**] prevents the undertaker from exercising powers of compulsory acquisition until it has first put in place either a guarantee or alternative form of security, approved by the Secretary of State, in respect of the liabilities of the undertaker to pay compensation to landowners whose land is compulsorily acquired for construction and operation of the Scheme. Article 43(3) provides that any such guarantee or alternative form of security is to be treated as enforceable against the guarantor or person providing the alternative form of security by any person to whom such compensation is payable. The Funding Statement [**APP-023**] explains that the current estimate of the Scheme is £600 million. This includes an amount to cover the compensation payable in respect of any compulsory acquisition included in the DCO and required for the Scheme. Should any claims for blight arise because of the Application, the Applicant, through Solaer Holding, has sufficient funds to meet the cost of acquiring these interests at whatever stage they are served. However, the Applicant has not identified any interests which it considers could be eligible to serve a blight notice.
REP2-240	**Funding**	19.1.4 to 19.1.5	Similarly, the Funding Statement contains little detail on the availability of funding and how this would be raised. The ExA cannot be assured based on the information provided that Solaer Holding will fund Sunnica Ltd as there is only a reference to the	As outlined in the Statement of Reasons [**REP2-018**] and explained in detail in the Funding Statement [**APP-023**], funding for the Scheme is provided from Solaer Holding S.L. (Solaer Holding), which is a company registered in Spain. The majority shareholder of the Applicant is Jigg FM UK Limited (Jigg FM), a company registered in England and Wales under company number 1149402 and a group company of Solaer Holding. Jigg FM is 60% owned by Padero Solaer Limited (registered in England and Wales under company number 08021337) and 40% owned by Solaer UK Limited (registered in England and

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
			assets held by Solaer Holding and no visible commitment from Solaer Holding to fund the project beyond its existing commitment. There is no transparency over funding, Sunnica Ltd has no funding ability, and Solaer Holding has a negative operating cashflow. A statement that Solaer Holding will be able to fund Sunnica from its own resources when the amounts are unknown is of no reassurance to the ExA.	Wales under company number 08581872), both of which are group companies of Solaer Holding. Funding is provided from Solaer Holding to Jigg FM, who then transfers it on to the Applicant. Solaer Holding currently has assets of over €100 million, as shown in its most recent consolidated accounts included at Appendix A to the Funding Statement [**APP-023**]. As can be seen from its consolidated funds, Solaer Holding will be able to fund the pre-development cost of the Scheme from its own resources. Should the Secretary of State grant development consent for the Scheme, Solaer Holding would seek further funding with the support of its legal and financial advisors (as is common with privately funded infrastructure projects). Solaer Holding would consult with a variety of financial institutions and investors to enable the construction, operation and maintenance of the Scheme. A final decision has not yet been taken on the type of finance that will be used, but this approach is tried and tested in the market and Solaer Holding has no concerns that it would be unable to obtain finance for the Scheme's construction, operation and maintenance. Solaer Holding would construct, operate and maintain the Scheme under a turnkey full EPC contract for the external investors. Solaer Holding would also provide the appropriate guarantees to the external investors and would retain control of the construction, operation and maintenance stages of the Scheme's lifecycle and would be involved in the long term. This type of funding structure is very commonplace in the market, and Solaer Holding has significant experience in funding and delivering solar projects across the globe. It has been active in the solar market since 2004 and has developed more than 200 different projects totalling more than 1.5 GW of photovoltaic capacity. Appendix B to the Funding Statement [**APP-023**] sets out details of some of the solar projects that Solaer Holding has already successfully brought forward through finance. These include two solar farms built in the UK, being Eveley Solar Farm (one of the largest solar farms built in the UK in 2016) and Canworthey Water (at the time of construction in 2014 was the largest solar project built in the UK, and was constructed over three locations). Appendix B

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				demonstrates Solaer Holding's significant experience in the solar market across the globe, working with high-profile investors.
REP2-240	**Environment – Soils (agriculture)**	Annex C/D, RAC report.	Conclusions of the November 2022 RAC report on behalf of SNTS as given in the RAC 2022 report Executive Summary	The Applicant provides an initial response below, focused on the claims made in the RAC November 2022 report executive summary. However, it considers that the issue of agriculture, soils and BMV land can be considered further at the forthcoming Issue Specific Hearings, following which the Applicant may wish to supplement this response in writing in its Deadline 4 submissions. 1.3 – Assessment is inadequate in its consideration of agriculture and soils, fails to address food production and loss of irrigation resources. Response – the Applicant has already set out in its response at Procedural Deadline B [PDB-001] why food security/production is not a principal issue for consideration in the examination, but instead it is the use of BMV land that should be examined given it is BMV land that falls within planning policy and specifically the Energy NPSs, draft Energy NPSs and the NPPF. The Energy NPSs, draft Energy NPSs and the NPPF do not refer to food security in relation to the determination of applications for energy generation schemes. This is a conscious decision by the Government. The assessment of agricultural land quality at the Sunnica site follows the MAFF Agricultural Land Classification (ALC) guidelines (MAFF October 1988) and comprises work by three separate teams. One of these survey teams is RAC who undertook an ALC assessment for the opencast minerals site at Bay Farm. This assessment area overlaps with the subsequent application area for Sunnica. The RAC ALC survey report is given in Annex A to Appendix 12B of the Environmental Statement [**APP-115**]. As can be seen from the RAC report, Grade 4 land was found, the land limited to grade by soil droughtiness. The soil droughtiness limitation is due to light soils with poor crop available water retention in an area with a relatively dry and warm climate in the growing season. RAC note the presence of irrigation for this land but do not reduce the drought limitation on land grade because of this irrigation, which is the correct approach. The RAC claim that whether water abstraction licences could be lost is contingent on a farm trading the entire volume of its abstraction licence to another user. This would not occur because each host farm for Sunnica will

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				retain irrigated land outside of the Site, where it can apply some of total abstraction licence volume. 1.4 – technical review of baseline shows it is insufficiently robust. Response – The technical review of the baseline by RAC relies upon an ALC assessment by Patrick Stephenson Ltd [**REP2-097**]. This assessment was of agricultural land outside of the Sunnica site and fails to follow the MAFF 1988 ALC Guidelines. Most importantly for land limited to grade by drought, there is no calculation of the Moisture Balances, which is required to determine drought grade. Furthermore, the soils information recorded is insufficiently detailed for a Moisture Balance calculation, failing to note the sand fraction in either field work or the laboratory analysis. As above, RAC again neglect their own ALC survey work within the Sunnica site, in favour of the Patrick Stephenson Ltd work outside of the site that does not follow ALC Guidelines. The Sunnica ALC baseline comprises the work of three separate, experienced ALC practitioners, one of which is the former MAFF ALC regional survey team. These three separate survey teams found broad agreement of agricultural land with a significant drought limitation on quality and versatility, as per the MAFF ALC guidelines. The baseline is therefore robust. 1.5 – The baseline does not include data on soil carbon or nutrients needed to assess the benefits claimed. Response – The presence of nutrients and soil organic matter in a soil is dynamic. The ALC guidelines do not consider nutrient status or the organic matter content of a minerals soil as these are dynamic and heavily dependent on management. Instead, the guidelines assume a good standard of land management in the determination of an ALC Grade. The benefits of an extended fallow period are well established. ADAS research project SP08016 for Defra (Best Practice for Managing Soil Organic Matter (SOM) in Agriculture. 2009) is clear that reverting tillage land to fallow provides clear benefits both for soil organic matter and environmental impacts. Countryside Stewardship targets payments of £321/ha/y for option SW7: Arable reversion to grassland with low fertiliser input. The benefits of the option justifying this payment are described as follows "*A dense grass sward in arable fields at risk of soil erosion or surface*

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				runoff will stabilise the soil, reduce nutrient losses, and buffer sensitive habitats, such as designated aquatic habitats or terrestrial habitats sensitive to atmospheric nitrogen. It will also reduce surface runoff, which may help to reduce the risk of flooding." The RAC ALC survey noted above does record evidence of wind erosion. Measures for SW7 are broadly similar to the low input pasture that will be present for the duration of the solar power development. 1.6 – Desktop assessment of ALC grades differs from the reported site work. Response – Detailed ALC site assessment following TIN049 guidance is superior to a desktop assessment using strategic scale soil maps. RAC again ignore their own survey experience within the Sunnica site finding land limited to Grade 4 by drought. 1.7 – loss of agricultural output. Response – as noted above for 1.3, this is not a material planning consideration. Planning would have no input if this wind and water erosion prone land were entered into the Arable Reversion option described above. With the Scheme, we obtain the benefits of arable reversion, retain agricultural land for future use and get new renewable energy generation. 1.8 – Loss of Irrigation water Response – as for 1.3 above, this will not occur. Farmers will not trade their entire abstraction licence volume, and all will retain irrigated land outside of the Sunnica site. 1.9 – ES does not identify measures to mitigate impact on agricultural production or soils. Response – As for 1.3 above, agricultural output is not a material planning consideration. The claim of a potential adverse impact on soils is based upon a study by the University of Wageningen in the Netherlands. However, many Dutch solar farms have no gaps between the solar panels, making them radically different in their impact on soil to the solar panels above pasture that we have in England. The University of Wageningen research programme page for Solar Research: Soil Quality states "Some solar parks are designed in such

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				a way that the soil is completely covered, so no light or water reaches the surface and no vegetation grows under the solar panels. This reduces life in the soil, because soil life cannot feed on new organic material. The soil then no longer stores carbon and instead emits CO2." I am not aware of this practice for any solar farm in England or Wales, so the extrapolation of this impact from the Netherlands to England is false. With regard to soil health, it is long established that soils under repeated cultivation progress to an equilibrium of low organic matter content, and soil under perennial vegetation such as grassland progress to a higher organic matter equilibrium. Defra R&D project SP08016 (https://randd.defra.gov.uk/ProjectDetails?ProjectId=15536 ADAS, July 2009, Best Practice for Managing Soil Organic Matter in Agriculture: Manual of Methods for Lowland Agriculture – Defra Project SP08016) is clear, changing cultivated land to perennial grassland is very effective for carbon storage in soil, and highly beneficial for environmental impact. To gain this benefit, Countryside Stewardship offers farmers targeted payment of £321/ha/y for Arable Reversion, placing arable land under a low input perennial pasture (https://www.gov.uk/countryside-stewardship-grants/arable-reversion-to-grassland-with-low-fertiliser-input-sw7). The benefits of making this significant payment are described as follows – "*A dense grass sward in arable fields at risk of soil erosion or surface runoff will stabilise the soil, reduce nutrient losses, and buffer sensitive habitats, such as designated aquatic habitats or terrestrial habitats sensitive to atmospheric nitrogen. It will also reduce surface runoff, which may help to reduce the risk of flooding*." The reference RAC make to research on soil health under solar by the Wageingen University in the Netherlands is misleading. Many Dutch solar farms have been built without any gap between panels, leaving bare ground below them. This is not done in the UK. The University research topic (Solar Research: Soil Quality) page at [redacted] states that "*Some solar parks are designed in such a way that the soil is completely covered, so no light or water reaches the surface and no vegetation grows under the solar panels. This reduces life in the soil, because*

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				soil life cannot feed on new organic material. The soil then no longer stores carbon and instead emits CO2." A claim is made by RAC that the solar farm could displace cropping for an Anaerobic Digester (AD) unit. This claim is rejected by the farm developing the AD unit. Solar produces more energy per hectare than AD (Geyer, R et al: Spatially Explicit Life Cycle Assessment of Sun-to-Wheels Transportation Pathways in the US (Environ. Sci. Technol., 2013, 47 (2), pp 1170–1176)) and can achieve this with simultaneous sheep grazing and the soil health and wider environmental benefits that accrue from an extended fallow. Maize is a dominant AD substrate crop in the UK. There is no simultaneous grazing and maize is late maturing, late harvest crop sown in wide spaced rows. Risk of soil erosion is elevated for maize (https://defrafarming.blog.gov.uk/sustainable-farming-incentive-pilot-guidance-manage-maize-to-reduce-runoff-and-erosion/ Soil Erosion, diffuse source pollution and sediment problems associated with maize cultivation in England. University of Exeter, February 2010, Doctoral Thesis of Jaafar, Mokhtar). It would be highly counterproductive to constrain solar in favour of AD when there is no conflict, solar produces more energy and delivers soil health and wider environmental benefits.

2.17 REP2-244 Snailwell Parish Council

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
REP2-244	Need	1.1 & 2.1	SPC state that Brownfield and rooftop sites should be deployed with a priority over greenfield sites	The Applicant agrees with SPC insofar as it supports the development of rooftop and brownfield solar deployment where that deployment is possible from a planning and technical standpoint as well as makes sense commercially for all electricity consumers. However, the Applicant does not agree that brownfield and rooftop sites should be deployed with a priority over greenfield sites, as this implies that greenfield sites should not be consented until all brownfield and rooftop opportunities are delivered. Many (possibly most) brownfield and all rooftop solar installations are or will be "Distributed Generation" – because they connect to the electrical Distribution systems, rather than the National Electricity Transmission System. Section 7.5 of the Statement of Need **[APP-260]** explains that Distribution networks operate at a lower voltage than the transmission networks, and are located closer to points of final demand, so generators that connect to these systems will have smaller capacities than those that connect to the NETS. The urgent need for large capacities of new solar generation in the UK in order to meet climate change obligations simply means that brownfield sites are highly unlikely to be capable of accommodating a sufficient scale of solar generation to meet decarbonisation needs. Any delay in developing greenfield sites therefore places the achievement Net Zero at a significantly greater risk than would be the case if both greenfield and brownfield sites were developed with the same priority. Section 7.5 of the Statement of Need **[APP-260]** concludes that "need for distribution connected generation is in addition to, not in place of, the need for additional transmission connected generation. The development of distribution connected generation will not do away with the need for further transmission connected capacities"
REP2-244	Need	1.3	SPC also provided a quote from Luke Murray made at the Sunnica West Site A and Site B consultation: "He also stated in the same answer that the scheme would not be economically viable	The Applicant wishes to note that prior to submission, it revised its position on this point. Section 9.2 of the Statement of Need **[APP-260]** – in particular Figure 9-3 and 9-5 – shows that globally solar is economically efficient on an LCOE basis and is cheaper than many other forms of generation. The deployment of standalone solar in the UK demonstrates this fact. The Applicant considers that the Sunnica scheme is commercially viable on a stand alone basis. Section 9.3 of the Statement of Need shows that scale is important in that determination. Larger scale schemes deliver more carbon savings and at a lower cost than do multiple smaller schemes of the same capacity, and this is in full alignment with current and enduring government energy policy.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
			without the battery storage"	
REP2-244	Need	1.3	SPC also notes the national advantage of BESS to contribute to grid balancing, and states that independent BESS installations can and are being approved at suitable locations in England	The Applicant agrees with SPC that BESS installations can and are being approved at other locations in England, and proposes to bring forwards a BESS as Associated Development to the scheme. The Applicant's Written Summary of Sunnica Limited's Oral Submissions at Development Consent Order Issue Specific Hearing on 1 November 2022 **[REP2-036]** sets out the Applicant's case.
REP2-244	Need	2.9	SPC questions the benefits of the scheme in reducing carbon	Section 3.1 of the Statement of Need **[APP-260]** describes that the deployment of renewable generation, and the closure of carbon intensive generation since 2011 has been the key driver of carbon emissions reductions in UK electricity generation to date. Low carbon plant decarbonises the grid. Chapter 5 of the Statement of Need **[APP-260]** describes that electricity demand is anticipated to grow in Future Energy Scenarios which meet Net Zero, through the substitution of carbon intensive modes of transport, home heating and commercial applications, to clean electricity. Chapter 6 of the Statement of Need **[APP-260]** describes that significant capacities of solar generation and other forms of low-carbon generation, as forecast by National Grid and others, is needed in order to fulfil this growing demand. Figure 6-2 of the Statement of Need **[APP-260]** shows that if the electricity anticipated to be generated by solar panels over the period to 2050 is generated from CCGT rather than solar, then CO2 emissions would continue to grow. The conclusion is clear: without solar, decarbonisation is not possible. Low carbon schemes such as Sunnica decarbonise the grid and are an essential component in the achievement of Net Zero by 2050. The Applicant has also responded to comments on the life cycle GHG assessment in the thematic response on Climate at this Deadline 3A and contained in this document.
REP2-244	Design	2.3	The size and layout of the Scheme comprising four Sites will have a cumulative and substantially adverse impact on our	The size and shape of the Scheme is necessary in order to deliver the scale of renewable energy generation benefit that the Scheme will provide. Further detail is provided in the Statement of Need **[APP-260]**. The design of the Scheme has been shaped by detailed studies of the character of the landscape and settlements and engagement with stakeholders including through community

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
			community and way of life.	consultation. As a result of the design approach taken by the Applicant, the design of the Scheme incorporates offsets from solar farm structures to settlement edges, existing vegetation, including hedgerows, public rights of way and road networks. The design of the Scheme also conserves field patterns, ecology and historical features (including below ground archaeology) across the Order limits, including pine lines. This approach preserves the sense of identity of the landscape. The Design and Access Statement **[APP-264]** describes how the Applicant's approach to the development of the design of the Scheme has been sensitive to place and local character. The Applicant has prepared a Technical Note on Settlement Design Iteration as Appendix A to the Applicant's Response to the First Written Questions **[REP2-038]**. This explains in more detail how the Scheme has been refined through the design development process so as to be sympathetic to its setting and communities. With the mitigation proposed, the ES demonstrates that the Scheme will not have any 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 is however acknowledged that the Scheme will result in residual significant adverse effects upon landscape and visual receptors and heritage assets. Whilst it has not been possible to avoid all impacts these have been minimised, where possible, through careful design and detailed mitigation strategies.
REP2-244	**Planning**	1.3	The proposed BESS is not able to be consented under the DCO as 'Associated Development'.	Paragraphs 3.2.3-3.2.10 of the Planning Statement **[APP-261 to APP-263]**, Section 4.2 of the Applicant's Written Summary of Sunnica Limited's Oral Submissions at Development Consent Order Issue Specific Hearing on 1 November 2022 **[REP2-036]**, and Appendix B to the Applicant's Response to First Written Questions **[REP2-038]** explain the reasons that the proposed BESS meets the definition of 'Associated Development' and is able to be consented by the DCO.
REP2-244	**Alternatives**	2.11	The Applicant has not detailed any alternative locations.	ES Chapter 4, Alternatives and Design Evolution **[APP-036]** and ES Appendix 4A, Alternative Sites Assessment **[APP-054]** explain the alternative site options considered by the Applicant and the reasons for the Applicant's decision in identifying and selecting the Sites, which are suitable for the Scheme.
REP2-244	**Alternatives**	2.11	The Applicant has only provided information	Paragraph 2.48.10 of Draft NPS EN-3 sets out:

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			about one connection option, Burwell Substation.	*"The connection of the proposed solar farm into the relevant electricity network will be an important consideration for applicants of solar"* Paragraph 2.48.12 goes on to explain that: *"The applicant may choose a site based on nearby available grid export capacity. Locating solar farms at places with grid connection capacity enables the applicant to maximise existing grid infrastructure, minimise disruption to local community infrastructure or biodiversity and reduce overall costs."* The electricity transmission system is major existing infrastructure that cannot be easily or quickly expanded. New large scale generating stations need to be located near the transmission system, where capacity to receive the electricity generated is available. In considering irradiation and land availability aspects in the UK, the Applicant considered that their search for suitable locations for a large-scale solar farm would be more likely to be successful in East Anglia where land is more readily available than in areas for example on the south coast or the south west, where generally there are more constraints. In considering the connection of a potential scheme to the National Grid, the Applicant considered that while Distribution Networks are well suited for the connection of small scale (e.g. <30MW) generation schemes, they are not well suited to accommodate multi-hundred MW schemes as proposed in the project aims. The Applicant therefore has looked at connections directly to the National Electricity Transmission System (NETS), and six existing NETS substations were identified as centres of search. Bramford was excluded because enquiries suggested a lower chance of achieving an early unconstrained connection for a scheme of the proposed scale. Subsequent reviews, using National Grid's Connect Now Research Assistant, have not shown that any large-scale generation connections are readily available at Bramford against the target timelines for development of the Scheme. Ryhall & Pelham were excluded because they had no generation capacity connected at the time of enquiry, and subsequent reviews, using National Grid's Connect Now Research Assistant tool, have not shown that that any generation connections capable of accommodating the proposed scale of the Scheme, are readily available at either Ryhall or Pelham.

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				Walpole was excluded because of its proximity to the coast and therefore potential competition with / suitability for landfall point for offshore wind, and known ALC gradings in land close to the substation, making it less likely that suitable land could be identified within a reasonable distance of the substation. Necton was developed specifically for Dudgeon OWF and construction was completed in 2016, it therefore was not an option for connection at the time of initial screening. Subsequent reviews, using National Grid's Connect Now Research Assistant, have not shown that any large-scale generation connections are readily available at Bramford against the target timelines for development of the scheme Eaton Socon and Burwell Main were therefore considered as the most likely points of connection for a multi-hundred MW solar generation scheme in East Anglia. Initial reviews of land constraints (consistent with those listed in Stage 2 of the Sunnica Energy Farm Alternative Sites Assessment (ASA) **[APP-055]** led the Applicant to its view that Burwell Substation was more likely to lend itself to being suitable for a large scale Scheme than Eaton Socon. Subsequently, Transmission Entry Capacity has been secured by other potential solar developments which propose to connect to the National Electricity Transmission System through Eaton Socon, and insufficient capacity is currently available to connect Sunnica to that substation. Burwell Substation is part of the NETS that has capacity to receive power from a large-scale solar farm and transmit it over a wide geography. The Applicant sought a site that is well suited to connecting to Burwell Substation and secured a grid connection agreement from NGET. The Applicant identified that the Sites are suitable in terms of proximity to the Burwell Substation. As demonstrated by paragraphs 2.2.3 to 2.2.4 of the Alternative Sites Assessment **[APP-054]**, the Applicant's selection of land that would enable a connection to Burwell Substation directly accords with the Draft NPS EN-3 paragraphs 2.48.10 – 2.48.12. Notwithstanding the above, as demonstrated by the Statement of Need **[APP-260]**, the urgent need for large scale solar energy generation infrastructure is such that solar NSIPs in other location and/or connecting to other parts of the NETS will be required if commitments and objectives for a secure, affordable and zero carbon energy system are to be delivered.

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				As such, land in other locations that would connect to another part of the NETS that also has capacity would be additional schemes that are required along with the Scheme to meet the need, rather than alternatives to the Scheme.
Listed i	**Alternatives**	2.11	The Scheme appears to contradict its own parameters in its site selection in relation to agricultural land, gradient and heritage assets (e.g. Chippenham Park).	The Applicant respectfully disagrees. Figure 10H of the Alternative Sites Assessment **[APP-054]** shows that the vast majority of the Sites are flat, with only small pockets of land of land shown to be at slope gradient of >3%.
REP2-244	**Environment - Climate**	2.1	*"If we ignore carbon emissions on a global scale, particularly emissions prior to entry to this country, we are ignoring the fundamental issue the global element of global carbon emissions which undoubtedly contribute to global warming*."	Sunnica has completed a whole-life environmental footprint study for the Scheme, which includes an assessment of the climate change impacts of the solar panels that it proposes to use within the Scheme as well as the supporting infrastructure, from manufacture through to decommissioning and disposal. A lifecycle GHG assessment is presented in Chapter 6: Climate Change **[APP-038]**. Paragraphs 6.3.6 - 6.3.24 of this chapter set out how the lifecycle GHG emissions have been calculated. The GHG calculations include global emissions associated with the Scheme: • Embodied carbon associated with the manufacture of components, including: o Solar PV modules o Steel supports o Inverters, Transformers and Switchgear o Substations o BESS o Cabling • GHG emissions associated with transportation of workers and materials to the Sunnica site, including transportation of materials via HGV and sea freight from

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				China and South Korea for the modules, BESS and BESS inverters, and from Europe for all other materials. Please refer to Chapter 6: Climate Change **[APP-038]** and the Applicant's response to First Written Question 1.6.1 **[REP2-037]** for more detail on the lifecycle GHG assessment.
REP2-244	**Environment - Built Heritage**	2.4	Concerns over the isolation of heritage assets	The Applicant has undertaken an assessment of impact to the historic environment, presented in Chapter 7 – Cultural Heritage **[APP-039]**. This takes into consideration impacts to the setting of heritage assets, acknowledging the importance of relationships between assets and the potential for isolation where this is a factor in their heritage significance. The ES concludes that there will be no significant effects to heritage assets in Snailwell as a result of isolation.
REP2-244	**Environment - Ecology**	2.5	**Ecology and Nature Conservation** The Scheme should have avoided the most sensitive habitats. SPC has concerns about the scheme identification of land use and quality is not accurate and the availability of Defra Metric spreadsheet used in BNG assessment. Inadequate consideration for adverse impacts to Chippenham Fen and Snailwell Poor Fen Ramsar site and SSSI including Snailwell	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). The comment regarding BNG is noted by the Applicant. An updated calculation of Biodiversity Net Gain including all the calculations using the latest Defra metric 3.1 and updated habitat mapping, will be provided at the earliest convenience during the Examination process. The Applicant disagrees that inadequate consideration for adverse impacts to Chippenham Fen and Snailwell Poor Fen Ramsar site and SSSI including Snailwell Meadow and Fenland SAC has been made in the HRA. 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

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			Meadow and Fenland SAC has been made in the HRA. SPC has concerns about there is no acknowledgment or mitigation offered to make good the detrimental effects of soil and substrata compression due to the heavy construction traffic.	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 outlined in Framework Operation Environmental Management Plan [**APP-126**] and secured through the draft DCO. In any event, notwithstanding this position, as set out in the Heritage and Substation Connection Update, for heritage reasons the Applicant has now determined to remove Sunnica West B from the Scheme, which would avoid impacts arising from that site. The Framework CEMP **[REP3-015]**, Framework OEMP **[REP2-028]** and Framework DEMP **[REP2-030]**, requires the appointed contractor to prepare a Soil Management Plan which will include measures to protect the soil during construction, operation and decommissioning, including potential damage to soil structure through compaction.
		2.12	**Noise and vibration** a) Construction Phase: SPC has concerns related to construction phase noise, especially as the Snailwell Short Rd is being proposed as an access route for the scheme and the hours of work will have a significant adverse effect to the	Construction and decommissioning noise (including piling) were assessed at Snailwell (receptor R4) as being Negligible and not significant. A Piling Method Statement will be included as part of the CEMP. The Snailwell Short Rd access route is a secondary access route for Sunnica West A and Sunnica West B. The secondary access points also provide an alternative access in case of emergency. It is acknowledged that there will be the requirement for the occasional HGV to travel on the local highway network to access the secondary access points. However, given the likely low level of construction traffic using these routes, noise effects are not significant. Low frequency noise can be very difficult to predict with a high level of certainty and similarly hard to identify and resolve if present. This is because it can be generated by the unexpected interactions between system components and can be amplified by the geometry of the site and receptor buildings. The issue of low frequency noise will be appropriately mitigated (through isolation and attenuation measures). This commitment will be included as part of the

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
			surrounding communities (i.e. the Jockey Club and the Godolphin Gallops). b) Operational Phase: SPC has concerns related to the impact of low frequency hum from the proposed equipment and plant. Also, concerns about noise and vibrations during pilling activities	design principles, which specify how mitigation will be secured in the design to reduce environmental effects.
		2.13	**Water Resources** SPC has concerns about the changes to the hydrology that can occur due to the construction and operational phases. Effects of the scheme it could have significant impact on unique and rare and protected species only found in this area in and around several SSSI and Ramsar sites like Chippenham Fen and Snailwell Meadows (i.e. any disruption or change to the habitat poses a significant risk	The realisation of the Scheme's ambition will have benefits to the soils and biodiversity within the Scheme and for the biodiversity, water quality and hydrology of the watercourses into which it drains. The Scheme facilitates the habitat creation underpinning the Chippenham Fen and River Snail priority area by recognising the natural soil types as part of the nature recovery envisaged post-intensive agri-husbandry. Specifically, allowing the fields to return to a more natural condition enables the recharge of a pocket of fen peat soils and restoring the hydrology of the remaining area as well as facilitating the connectivity between these Chippenham Fen and Snailwell Poor's Fen and Snailwell Meadows. 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. 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

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
			to the species Selinum carvifolia).	Assessment **[APP-094]**. These assessments conclude that there will be no significant effects on the Chippenham Fen designated sites from construction or operation.
REP2-244	**Environment - Water**	2.13	Risk of change in drainage pattern and effect on Chippenham Fen, Snailwell Poor Fen. Risk of contamination to groundwater source protection zone and Cam & Ely Ouse Chalk and hydrology from contaminated runoff including from fire fighting.	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. Section 3.9 of the Drainage Technical Note, Annex F of the FRA **[AS-010]** includes commentary confirming the site drainage proposals provide no adverse impact on the drainage patterns for Chippenham and Snailwell Poor's Fen. For Chippenham Fen and Snailwell Poor's Fen, Sunnica West Site A drains away from the SSSI, naturally following the topography (Chippenham Road is a watershed line effectively). Surface water in Sunnica West Site B is to be collected and treated in swales to manage any water quality risks. In this parcel, the drainage generally falls within the site to low spots with a small portion west to the River Snail; any drainage to the far west adjacent to the River Snail joins downstream of the SSSI. There will be no increase in runoff volumes, and no reduction in water quality in the long term with the proposed scheme. It is considered the drainage catchment for the Site does not affect the primary River Snail catchment and spring upstream which would feed the majority of water for the Snailwell SSSI. The proposed surface water drainage strategy is outlined within Annex F Drainage Technical Note **[APP-098]**. 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. The construction process will take place according to methodologies and mitigation as outlined in the Framework Construction Environmental Management Plan (CEMP) **[APP-123]**. Table 3-4: Flood Risk, Drainage and Water Resources of the CEMP outlines the mitigation required during construction relating to drainage. 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.

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				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 CEMP **[APP-123]**. Paragraph 9.7.61 of Chapter 9: Flood Risk, Drainage and Water Resources of the Environmental Statement **[APP-041]** and Section 10 of the Drainage Technical Note **[AS-010]** 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, 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 does not need chemical additives for storage purposes, and no additives would be added for firefighting purposes. The internal fire suppression system is water based, and Hydrogen Fluoride gas is not going to be used in the event of a fire. The water used will therefore be less likely to be contaminated but will still be directed to the fire water storage lagoons for any external fires (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). The water used for internal fire suppression will be contained within a tank for offsite disposal at a licenced waste facility. 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 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

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				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 of the ES **[APP-041]** and as described in the Framework CEMP **[APP-123]**. Measures outlined in the Framework CEMP 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. 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.
REP2-244	**Environment - FRA**	2.13	Underestimating Flood Risk and runoff amounts	The Scheme is not increasing peak runoff rates and volumes from the solar PV field areas. The drainage strategy within the Drainage Technical Note **[AS-010]** confirms the surface water runoff from PV areas and BESS/Compound areas can be collected and attenuated for up to the 1 in 100 year design flood event including 40% allowance for climate change. This complies with national and local planning policy. Baseline calculations for surface water runoff are included and discussed in the technical note **[AS-010]**. The assessment uses recognised industry standard rainfall catchment and runoff data assessment tools to establish existing runoff rates across the Order limits. It is considered surface wate runoff and mitigation has been adequately assessed in line with planning policy.
REP2-244	**Environment - Landscape and Visual**		Snailwell Parish Council raise concerns that the Scheme will change the rural open agricultural landscape into a heavily industrialised area, cutting off and partitioning the	Snailwell (LLCA 21) is a small, nucleated settlement with some vegetated enclosures, set within undulating farmland to the north of the A14. It is located between Sunnica West Site B, which is approximately 0.5km to the north and Sunnica West Site A, which is approximately 0.4km to the southwest. A gap of approximately 1.1km will be retained between the two sites, with the landscape pattern and character preserved between them post-construction. To the south-east of the village, solar panels within Sunnica West Site A will be sited between existing woodland blocks where the ground falls away to the south. Proposed woodland to the south of Snailwell on the northern edge of Parcel W03 will further aid in screening this part of the Scheme, and proposed native grassland/wetland and retained

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			populations that live here. Mitigation proposals will not be effective across some areas particularly Limekilns and would be visible for at least a generation and mitigation itself will alter the character of the landscapes. Whilst it does not specifically mention views, there are also references under the Landscape and Vissual heading to the use of bridleway 204/5 and footpath W204/1.	woodland adjacent to the River Snail to the north of the village will reinforce the existing vegetation pattern. By keeping development away from Chippenham Road, the perception of the Scheme will be limited in journeys between settlements to the north. To the north of the village, solar panels within Sunnica West Site B have been sited in small parts of parcels W01 and W02 away from the River Snail and Snailwell Road. This is to conserve the landscape features of woodland and the river and reduce the visibility of the Scheme from local roads. New native wet grassland is proposed across these parcels as a positive response to the adjacent Chippenham Fen National Nature Reserve and to preserve below ground archaeology. The LVIA has concluded that there would be significant intra-project effects on the character of Snailwell (LLCA 21) during construction, but that the effects of operation and decommissioning would be not significant **[APP-106]**. Significant intra-project visual effects have also been identified in construction, but visual effects during operation and decommissioning are also predicted to be not significant **[APP-107]**. This includes views from bridleway 204/5, which are represented by viewpoints 39, 40, and 41. There will be some views of construction and of the top of the first rows of solar panels in W03 in the first year of operation, but views of the site are already largely screened by dense woodland along the northern side of the route. This is clear from the photographs in Figure 3a to 4f in Snailwell Parish Council's Written Representation **[REP2-244]**. Planting proposed on the boundaries of the Scheme will further enhance this screening, including in views from the north. Views from footpath W204/1 will be affected during construction, particularly where the route crosses Cable Route B. These effects would be major adverse and therefore significant. However, existing vegetation in leaf would screen views of the Scheme in year 15 of operation, such that effects would be neutral. The Scheme will be visible from the Limekilns Gallops, as evidenced in the photomontage presented in Figure 10-100 **[APP-230]** and the Applicant has assessed the residual visual effects to be moderate adverse at year 15 of operation, which is significant. Views of Ely Cathedral, which are difficult to perceive with the naked eye, will be preserved. As no part of the Scheme falls within LLCA 26, impacts on its character relate to its setting, which is defined in part by the site but also includes the busy A14 and A11 trunk roads and railway lines. The key characteristics listed in Appendix 10E

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				[APP-104] would remain and the significance of effect has been assessed as minor adverse by year 15 of operation. In any event, notwithstanding this position, it is also noted that, as set out in the Heritage and Substation Connection Update, for heritage reasons, the Applicant has now determined to remove Sunnica West B from the Scheme, which would reduce impacts to Snailwell as result of the Scheme.
REP2-244	**Environment - Socio-economics**	2.8	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.	The Applicant has responded to this point in detail at paragraphs 12.63 and 12.86 in Chapter 12 of the Applicant's Response to the Local Impact Report **[REP3-019]** as submitted at Deadline 3. 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 and there would therefore be no consequential impacts on wellbeing of the community in these locations. There are some 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 to limit development to one side of the road, providing offsets of grassland and additional planting to enclose and screen solar farm infrastructure.
REP2-244	**Environment - Transport**	2.3	Proposed route through Snailwell for access to West Site B will funnel construction and operational traffic through Snailwell for 43 years.	The overall construction period is forecast for two years, which is short term, with the construction of Sunnica West Site A forecast for seven months as identified in Table 6-3 in the Transport Assessment **[APP-117]**. This information is provided within the Transport Assessment **[APP-117]** in Plate 2 and 3 which identifies the daily peak number of HGVs and the daily average number of HGVs along the local highway network. In Plate 2 and 3 of the Transport Assessment **[APP-117]** it identifies up to 20 daily HGVs on Snailwell Short Road and on average 10 daily HGVs on Snailwell Short Road. Table 13-33 in the Transport and Access chapter of the ES **[APP-045]** details that peak construction period traffic will not result in significant effects for vehicle travellers in terms of driver delay, accidents and safety. In addition, the peak construction traffic will not result in

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				significant effects on Non-Motorised Users (NMUs) in terms of severance, pedestrian delay, pedestrian/cycle amenity, fear and intimidation and accidents and safety. During the operational phase, only occasional and infrequent staff vehicle movements will be made which are associated with maintenance and therefore not forecast to have a significant impact on the local highway network.
		2.7	Submitted material not considered acceptable by Local Highways Authorities.	Whilst there are a number of points of disagreement, the Applicant notes 13.2 of the Local Impact Report, which states: "The Councils consider that many of these issues could be resolved, by the Applicant establishing the extent of likely impacts, and those being capable of being resolved through suitable mitigation." The Applicant respectfully disagrees with the LHAs' position on the acceptability of the submitted material, but notes that agreement is achievable subject to addressing the LHA's concerns. The differences in position are set out in detail in the LIR and the Applicant's response to the Local Impact Report **[REP3-019]**. Notwithstanding this, we are working with the LHAs to resolve a number of differences, which includes further details and clarifications regarding the site accesses and highway works which will be provided within an update to the Framework Construction Traffic Management Plan and Travel Plan **[REP3-014]** that the Applicant proposes to submit at Deadline 3A.
		2.7	Impact on NMUs is underplayed	An EIA assessment of the impact of the scheme on NMUs was undertaken from a range of perspectives, including the effect of temporary PRoW closures as presented in paragraphs 13.8.62 to 13.8.65, 13.8.128 to 13.8.131, 13.8.159 to 13.8.162 and 13.8.241 to 13.8.245 within the Transport and Access chapter of the ES **[APP-045]**, which is also discussed in the Transport Assessment **[APP-117]** and also Chapter 6 of the Framework Construction Traffic Management Plan and Travel Plan **[REP3-014]**. Based on the locations of the routes, including the destinations that they serve, it was considered reasonable to base an assessment on the likelihood that there will be some NMUs, but it was concluded that levels would not be so substantial that a temporary closure for three weeks would be classified as a significant adverse effect in EIA terms. This is particularly the case as the routes in question are likely to be mostly used as leisure routes, of which there are a range of alternatives in the locality. To provide further confidence to this conclusion, PRoW surveys were carried out in July 2022 to capture the existing usage of the PRoW that are proposed to be temporarily closed. The results of the PRoW surveys identified a low number of daily users of the PRoWs. As a

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				result, and taking account of the July 2022 surveys, the conclusion presented in the Transport Assessment and Transport and Access chapter of the ES **[APP-117]** remains unchanged and it was concluded that there would be no significant adverse impact on NMUs as a result of the PRoW closures during the construction period. Further information on the additional survey data which was carried out is detailed in Section 10 of the Transportation Technical Note **[REP2-041]** submitted at Deadline 2. Table 13-33 in the Transport and Access chapter of the ES **[APP-045]** details that peak construction period traffic will not result in significant effects for vehicle travellers in terms of driver delay, accidents and safety. In addition, the peak construction traffic will not result in significant effects on NMUs in terms of severance, pedestrian delay, pedestrian/cycle amenity, fear and intimidation and accidents and safety.
			Worker and HGV traffic will substantially impact on the road network, particularly at peak times.	As part of the embedded mitigation for the scheme, the construction staff will travel to / from the site at 0600-0700 hours and 1900-2000 hours respectively. This is outside of the highway network peak hours (0800-0900 and 1700-1800) in order to avoid peak time capacity impacts, representing an efficient use of the highways network. The working hours of 0700-1900 hours are secured under the draft DCO, with reference to the requirement relating to the Construction Environmental Management Plan **[AS-302]**. The construction staff will travel to and from the site outside of the network peak hours therefore no impact is forecast within the peak commuting times of 0800-0900 and 1700-1800. A number of controls and measures are outlined within the Framework Construction Traffic Management and Travel Plan **[REP3-014]** which relate to construction staff and HGVs. As concluded within the Transport and Access chapter of the ES **[APP-045]**, no significant impact is forecast in EIA terms. Chapter 7 of the Framework Construction Traffic Management Plan and Travel Plan **[REP3-014]** (which is being updated for Deadline 3A) sets out significant embedded mitigation, including measures to control the arrival and departure of HGVs for the site. The timing restrictions are: a. No arrivals or departures on a Weekday between 08:00 and 09:00, and between 17:00 and 18:00; b. No arrivals or departures on a Saturday before 08:00 or after 13:00; and

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				c. No arrivals or departures on Sundays or public holidays. No HGV deliveries will be programmed outside of staff working hours, i.e. before 0700 hours or after 1900 hours on a weekday, in addition to the restrictions above. Thus there will be no HGV movements in the peak construction staff traffic hours of 0600-0700 hours and 1900-2000 hours. Table 13-33 in the Transport and Access chapter of the ES **[APP-045]** details that peak construction period traffic will not result in significant effects for vehicle travellers in terms of driver delay, accidents and safety. In addition, the peak construction traffic will not result in significant effects on Non-Motorised Users (NMUs) in terms of severance, pedestrian delay, pedestrian/cycle amenity, fear and intimidation and accidents and safety.
			No sustainable travel measures	The Framework Construction Traffic Management Plan and Travel Plan **[AS-300, AS-301]** identify measures to promote sustainable travel and to minimise the number of construction vehicles on the local highway network. The Framework Construction Traffic Management Plan and Travel Plan **[REP3-014]** identifies a cap on the number of construction staff vehicles and therefore the sustainable measures outlined within the document will be applied to ensure the cap is not breached. Due to the nature and scale of the Scheme, the site is necessarily located in a very rural area, with associated limited access to public transport. In order to minimise the number of staff vehicles travelling to/from the site, the Applicant will implement measures to maximise the numbers of staff that lift share with colleagues. As identified in Chapter 7 of the Framework Construction Traffic Management Plan and Travel Plan **[REP3-014]**, supporting car sharing and use of a minibus will form the basis of improving the sustainability of staff transport. The full Transport Plan will be developed when there is greater knowledge of staff locations and characteristics, as is typical.
			Road sections will not be fit for purpose Fordham Road has a weight limit of >7.5T	Swept path analysis has been undertaken for HGVs and Abnormal indivisible Loads (AILs) and are provided within the Framework Construction Traffic Management Plan and Travel Plan [**REP3-014**]. Chapter 7 (paragraph 7.2.14) of the Framework Construction Traffic Management Plan and Travel Plan includes a requirement to undertake conditional surveys before, during and after construction to identify damage caused by the construction of the scheme, and to remediate such damages. If appropriate, measures will be taken prior to construction to ensure safe passage for vehicles.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				The weight limit identified on Fordham Road relates to the weight restriction of the bridge, located to the north of Sunnica West Site B Site Access D on Fordham Road. This is not proposed to be used within the HGV routes which are established within the Framework Construction Traffic Management Plan and Travel Plan **[REP3-104]**. The first image below provides a screenshot of the weight limit sign relating to the bridge on Fordham Road travelling to the bridge from the south (northbound) which references the weight restriction in 0.5 miles which is where the bridge is located. The second image below provides a screenshot of the weight limit sign on Fordham Road arriving at the bridge from the south. Travelling from towards the bridge from the north (southbound) there is also a sign referencing the weight limit on the bridge ahead as shown in the first screenshot below. The second screenshot provide an image the weight limit sign at the bridge. Upon entering Snailwell from the north (southbound) there is no signage provided which references a weight restriction along the section of Fordham Road within Snailwell.

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				 Therefore, the HGV route identified along Fordham Road for HGVs to travel to/from the Sunnica West Site B Site Access D on Fordham Road does not use highway which is subject to a weight restriction.
		2.9	PV life of 25 years, although output degrades with time. Potential for impacts due to replacement	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. Therefore, 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 **[REP2-012]** 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

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				those assessed by the Environmental Statement, including operational impacts on themes such as Traffic and Transport and Socio-economics.
REP2-244	Environment – Air Quality	2.15	We request more details be provided relating to mitigation and predictions of worst case Air Quality, dust and light in all phases from construction to decommissioning. There is currently insufficient detail.	A full air quality assessment and dust risk assessment (DRA) for the construction phase has been presented in the Chapter 14: Air Quality of the ES **[APP-046]**. The DRA was undertaken on a worst case basis, assuming the highest level of construction would be occurring at all locations across the site at the same time. In reality, different levels of construction activities will take place at different locations and time frames throughout the construction period. The resulting risk category is used to inform the mitigation measures required during construction, and these are designed to ensure no off-site impact from dust during construction – following IAQM guidance and over and above what is likely to be required (given they are based on the worst case scenario). The dust mitigation measures set out in Chapter 14 of the ES have been incorporated in the Framework Construction Environmental Plan (CEMP). The CEMP will more fully reflect the precise activities and will be a live document. Regular visual monitoring of construction activities and dust generation will ensure that measures can be strengthened, or work stopped if dust impacts do occur. The air quality assessment of the emissions from construction vehicles has shown no significant adverse impacts on air quality.
REP2-244	Environment – BESS – Fire Safety	2.10	Site design and risk assessment concerns	In recognition of the concerns raised by interested parties the Applicant has updated the outline Battery Fire Safety Management Plan **[REP2-032]** and submitted it for Deadline 2. It is considered this provides a detailed plan which ensures that the final design of the BESS will be acceptable and that in the unlikely event of a fire it would be managed safely ensuring the safety of site staff, first responders and the wider community. As stated in the Plan the BESS system selected for Sunnica will have completed UL 9540A testing which defines and quantifies gas emissions produced during thermal runaway. This data will then be used, if necessary, for specific BESS consequence modelling for the Sunnica site. A key priority of this dispersion modelling is to ensure that respondent exposure to any level of emissions from a BESS thermal runaway incident is minimised and the ERP provides clear alert protocols and safety guidelines.
		2.13	Water contamination concerns	Section 10 of the Drainage Technical Note **[AS-010]** discusses firewater runoff control and mitigation, in line with the Battery Fire Safety Management Plan.

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				The revised outline Battery Fire Safety Management Plan **[REP2-032]** also specifies capacity and indicative location of bunded lagoons to capture firefighting water run-off (noting that water will only be used to cool adjacent structures and no fire-fighting chemicals are to be used). BESS areas and drainage channels will integrate impermeable materials to ensure runoff water will not escape to ground. Bunded lagoon design allows for easy analysis of water content and safe extraction by tankers if environmental pollution safety levels are exceeded. It should be noted that the indicative design lagoon capacity is the maximum volume of the firefighting water tanks plus 40%. When the BESS system is selected at the detailed design stage together with the internal fire suppression system this water run off would drain to a separate water capture tank which will be appropriately sized for a full system discharge.
REP2-244	Environment - Arb		Concern over lack of information in relation to the loss of trees. No proposed site plan showing tree locations and constraints. Tree constraints (including stem diameter) estimated and no information provided on how trees will be impacted or removed. Landscape masterplans don't show trees consistently Concern over DCO power to remove trees even if they are subject to a Tree Preservation Order (TPO) (and particular concerns	An Arboricultural Impact Assessment Report (AIA) [**REP3-021**] has been submitted at Deadline 3 based on detailed survey data for key areas and more high level desk study and walkover (where feasible) data in other areas. This includes a Tree Protection and Removal Plan to show the Scheme layout in relation to tree positions and will identify those trees to be impacted or removed. Full tree survey data for any un-surveyed areas likely to be impacted will be obtained prior to commencement and will be submitted and approved as part of an Arboricultural Report secured via the CEMP [**REP3-015**]. Full planning consent is an exception to the requirement to apply for works to a tree subject to a TPO where the works are explicitly identified as part of the application and the Applicant is simply seeking to ensure the same principle applies to the DCO. Any tree works (including pruning or removal) which are identified as part of the AIA submitted at Deadline 3 would be consented as part of the wider DCO consent. Any further tree works, including to trees subject to TPO (not identified in the AIA) would be identified in the Arboricultural Report (produced alongside the CEMP) which would be submitted for approval by the LPA. This is included as a commitment in the CEMP alongside a commitment to minimise impacts to TPO trees wherever possible. The Applicant has developed a series of Environmental Masterplans **[REP3-022]**, which illustrate and describe the function of the environmental mitigation proposed. This includes existing vegetation to be retained within the Order limits, including hedgerows. The Environmental Masterplans should be read alongside the Tree Protection and Removal Plan which forms part of the AIA.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
			relating to TPO trees at Chippenham Road).	
REP2-244	Environment – BESS	1.3	As rechargeable batteries do not generate electricity or have valid technical necessity for co-location with solar panels, we ask that the BESS should be removed from this NSIP application since we do not consider it to be a material requirement or ancillary component part of this solar panel generating station. Battery storage can be located in an entirely separate location with no reduction to the power output of the solar panels. The scheme intends to import electricity from the grid to the BESS, which further endorses it is not a technical necessary requirement. The Applicant verbally communicated that	The Statement of Need **[APP-260]** provides a robust explanation of the BESS in Sections 10 and 11. Key parts of this statement are included below. Section 10.4 of the Statement of Need **[APP-260]** explains why battery storage is collocated with the solar farm and brings an important role in a low-carbon GB energy system. Paragraph 10.4.13 of the Statement of Need explains that "There is a clear, direct relationship between the solar generation station and the electricity storage which means that there are substantial benefits to their colocation which will result in an improved contribution to low carbon UK electricity supplies when compared to either coming forward independent of the other. Colocation of energy storage within solar generation schemes is not essential for either asset to make a significant contribution to the future operation of the NETS, however Table 10-1 [of the Statement of Need] demonstrates that the colocation of those assets enables additional operational capabilities to be accessed for system benefit, supporting the view of the Applicant that electricity storage is associated development as per the Guidance on associated development applications for major infrastructure projects. The relationship between the PV solar panels and the BESS was explored in the DCO ISH on 1 November 2022 and the Applicant's position is recorded in its oral submissions **[REP2-036]**. The Applicant also submitted a paper explaining why the BESS was associated development **[REP2-028]**. Justification for the location of the BESS is provided in Section 3 of the Design and Access Statement **[APP-264]**. For Sunnica East Site A and Sunnica East Site B, this includes siting the primary construction compound, BESS and substation in E33 adjacent to reservoirs and Lee Farm, so that their massing and land uses are perceived in the context of existing infrastructure features and built structures in the landscape; and siting the BESS and substation in E18 so that it is enclosed and screened by existing woodland along its northern edges and in part by roadside vegetation adjacent to Elms Road to its south-east. For Sunnica West Site A and Sunnica West Site B, the Design and Access Statement **[APP-264]** explains the reasoning for siting the primary construction compound and the BESS and substation within W17 at Sunnica West Site A, so that it is in part adjacent to existing

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			there was limited interplay between solar PV and battery storage" and stated the scheme would not be economically viable without BESS. From further comments SPC concluded the BESS is 500MW capacity. The Applicant stated the aspiration was to max out that connecting importing and exporting electricity. As an example, Mallard Pass NSIP does not have BESS. The need for the Sunnica BESS has not been adequately justified. In addition, the location has not been adequately justified. The 31ha for BESS is larger than needed and the location of BESS is therefore vague, making assessment inaccurate. The battery will need replacing within 10-15 years. The carbon	structures (agricultural barns which are to be retained) and bordered by the existing mature woodland which aids in screening the structures from the west and in views from the east. There are three BESS Compounds, with maximum footprints of the compounds being up to: • Work No. 2A (Sunnica East Site A): 66,000m^2. • Work No. 2B (Sunnica East Site B): 162,000m^2. • Work No. 2C (Sunnica West Site A): 83,000m^2. This totals 31.1ha, which is similar to the 31ha that Snailwell PC states is larger than needed for the Scheme. The maximum parameters are considered appropriate and reasonable, but as the use of the term implies it is a maximum, and the Applicant has the ability to build smaller if this footprint is found not to be needed during detailed design. It is noted that Snailwell PC would like the carbon emissions from the BESS calculated independently and the Applicant is happy to review this and provide comment, should the Council take this route. Some battery cells may need replacing during operation and Chapter 6: Climate Change **[APP-038]** has taken into account emissions form maintenance and repair works. F or Snailwell Parish Council's information, Say No to Sunnica Action Group Ltd commissioned Cranfield University to review the GHG calculations, which included the calculations for the BESS. The Applicant has prepared an initial response to this report **[WR-142, App A]**, and will be undertaking further sensitivity analysis to explore the impact of certain points raised in the Cranfield University response, and also the impact of different Scheme design scenarios being considered. An independent check has therefore already been carried out. The Applicant disputes that a worst case assessment cannot be made in the ES without limiting the BESS capacity, installation density, separation, barrier design, and battery type. It is considered sufficient information is provided in Table B-2 of the Design and Access Statement to provide a robust assessment of impacts. It is noted that the Council would like to see handling and transport protocols for the BESS components. This will be integrated into the project Health & Safety documentation, such as the H&S Plan, which the Principal Contractor will be required to prepare. The Outline Battery Safety Management Plan **[REP2-032]** and ES are not intended to capture all H&S matters relating to construction activities, however Table 5 of the Outline Battery Safety Management Plan does identify the safety guidance that relates to this issue, while Section 5.4 and 5.5

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
			emissions from replacements needs to be quantified independently. SPC considers a worst case assessment cannot be made in the ES unless BESS capacity, installation density, separation, barrier design, and battery type is stated. No handling and transport protocols have been promulgated by Sunnica, which is a significant risk.	identify the risks of handling and storage, which informs the principles of design presented later in the report.
REP2-244	**Environment – General ES**	2.14	Very little detail has been forthcoming with regard to decommissioning other than a fund will start to accumulate after 10 years. Further information relating to predicted timescales, daily activity, plan, equipment, traffic air quality and noise need to be covered in detail. Secured and ring fence funding must be lodged	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 **[REP2-022]** and Appendix 16E Framework Decommissioning Environmental Plan (DEMP) to the Environmental Statement **[REP2-028]**. The Framework DEMP will form the basis of 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. There is no justification for a decommissioning fund to be put into place as part of this DCO Application. The Applicant has committed to decommissioning the Scheme and this is secured by Requirement 22 of the draft DCO **[REP2-012]**. Among other things, Requirement 22 provides that a DEMP must be submitted and approved by the relevant planning

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
			at the commencement of the project.	authority/authorities in advance of decommissioning commencing, which must be substantially in accordance with the framework DEMP submitted with the Application **[REP2-028]**. If the undertaker does not comply with the terms of the DCO, enforcement provisions in the Planning Act 2008 would enable the relevant planning authorities to enforce and secure compliance. This same approach has been adopted on previous solar DCOs, and the requirement to provide a decommissioning fund is not commonplace. Neither the Little Crow nor Cleve Hill DCOs have such a requirement.

2.18 REP2-246 Suffolk County Council

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
REP2-246	Environment - General EIA	B.4	The Council's Cabinet approved in 2021 its Energy Infrastructure Policy. This policy recognizes that the delivery of Net Zero carbon emissions in the UK by 2050 is required to limit the future impacts of climate change, and that this will result in a succession of electricity generation and connection projects in Suffolk. As a result of the large number of projects hosted in Suffolk, Suffolk County Council has considerable experience of engaging with energy infrastructure projects under the Planning Act 2008 regime. Informed by this experience, the policy sets out that whilst recognising the importance of projects which could contribute to Net Zero the Council considers it is essential that projects do not lead to avoidable, unmitigated or uncompensated detriment to the communities and environment of Suffolk, and its existing businesses.	The Applicant notes this point and acknowledges SCC's experience with energy infrastructure projects. Each technical chapter presented within the Environmental Statement (Chapters 6 to 16 **[APP-038 to APP-048]**) assesses the potential effects during the construction, operational and decommissioning phases and proposes mitigation measures, where required, to avoid or reduce potential effects to ensure the Scheme does not lead to avoidable, unmitigated or uncompensated impacts. The Applicant is continuing discussions with SCC to understand and address any outstanding concerns.
REP2-246	Environment - Archaeology	C 6-8	Archaeology	The Applicant notes the Council's submissions and will continue to work with the Council to develop an appropriate mitigation strategy through the DAMS.
REP2-246	Environment – FRA and Water		Section H Key Issues: Flood Risk, Drainage and Water Resources. As LLFA CC concerns about flooding can be found in the Councils Relevant Representation **[RR-1340]**, and Section 9 of the Local Impact Report **[REP1-024]**. The council agrees that the implementation of high quality SuDS measures can be decided in the post-consent phase of the project through requirements.	The Applicant notes the point raised within the Relevant Representation **[RR-1340]** and Local Impact Report **[REP1-024]** and responded to those matters in its corresponding response documents submitted at Deadlines 1 **[REP1-016]** and 3 **[REP3-019]** respectively. The Applicant also notes the comment regarding suitably sized SuDS. The drainage strategy is based on a cautionary approach for infiltration and sizing of SuDS. The site is not space limited and if additional attenuation is required, it would be provided within the site boundary.

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REP2-246	Environment - Socio-economics	E 13-15	The Council's concern is that the assessment of impacts is technically flawed to the degree that the scale of impacts of the development are unclear, and that it is therefore difficult to determine the necessity and appropriateness of any mitigation. The Council also highlights the lack of collaboration with the Applicant until recently, hoping that an effective relationship on these matters can be agreed with the Applicant to develop skills strategies, similarly to those established with other infrastructure developers in the area.	The Applicant notes the concerns of the Council. The Applicant's response to paragraphs 12.17 to 12.22 and 12.39 in Chapter 12 of the Applicant's Response to the Local Impact Report **[REP3-019]** as submitted at Deadline 3 notes that discussions are underway with the Council on the assessment and will be taken forward in the SOCG. The Applicant's response to paragraphs 12.87, 12.88 and 12.93 in Chapter 12 of the Applicant's Response to the Local Impact Report **[REP3-019]** as submitted at Deadline 3 provides details on how the Applicant will work with the local planning authorities to develop a full Skills Plan. Specific measures such as those referred to in the LIR can be discussed, confirmed and agreed in this full Skills Plan.
REP2-246	Environment - Transport		Issues raised are those set out in the LIR	Please refer to the Applicant's response to the Local Impact Report **[REP3-019]** for a comprehensive response.
REP2-246	Environment – BESS – Fire Safety		Suffolk County Council is the Fire and Rescue Authority (FRA) for Suffolk and hosts Suffolk Fire and Rescue Service (SFRS). SFRS would be one of the emergency service agencies to respond in the case of a fire at the proposed site. The details of the Council's concerns about fire safety matters can be found in section 18 of the LIR **[REP1-024]**. The Council would like to highlight that its expertise in this domain is limited to the operational response to an emergency event, and that SFRS does not host in-house electrical engineering or technology specific expertise. The Council is therefore more concerned with the appropriateness of response planning measures and the design of mitigation features than with technical specifications of the Battery Energy Storage System (BESS).	In recognition of the concerns raised by interested parties the Applicant has updated the outline Battery Fire Safety Management Plan (BFSMP) **[REP2-032]** and submitted it for Deadline 2. It is considered this provides a detailed plan which ensures that the final design of the BESS will be acceptable and that in the unlikely event of a fire it would be managed safely ensuring the safety of site staff, first responders and the wider community. As stated in the outline BFSMP the BESS system selected for Sunnica will have completed UL 9540A testing which defines and quantifies gas emissions produced during thermal runaway. This data will then be used, if necessary, for specific BESS consequence modelling for the Sunnica site. A key priority of this dispersion modelling is to ensure that respondent exposure to any level of emissions from a BESS thermal runaway incident

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			As the Applicant seeks flexibility over the precise technology and configuration of the BESS, it is not useful at this stage to be prescriptive about what measures should be provided. The Council considers instead that the DCO and the SUNNICA ENERGY FARM – SUFFOLK COUNTY COUNCIL – COUNCIL DEADLINE 2 SUBMISSION 6 supporting outline Battery Fire Safety Management Plan should provide a robust framework for approval of detailed matters. This means that at the post-consent stage the final management plan should at least cover the provision of water supplies, access for emergency response, emergency preparedness measures, and the containment of environmental damage. The DCO and outline plan should require that the detailed design of fire safety features is justified by reference to rigorous modelling and testing by qualified fire engineers. The Council understands that the Applicant intends to provide an updated outline Battery Fire Safety Management Plan, notes the inclusion of fire safety issues on the agenda for ISH3, and looks forward to exploring this issue in more detail in the light of the revised plan.	are minimised and the Emergency Response Plan (ERP) provides clear alert protocols and safety guidelines. The Applicant has responded to section 18 of the LIR and trusts that the Council's concerns are fully addressed.

2.19 REP2-248 Suffolk Wildlife Trust

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
REP2-248	Environment - Ecology		**Impacts on Chippenham Fen and Snailwell Poor's Fen Site of Special Scientific Interest (SSSI), Snailwell Meadows SSSI and the Fenland Special Area of Conservation (SAC).** Additional evidence will be required to provide confidence that significant direct and indirect impacts from construction and operation will be avoided or adequately mitigated, including but not limited to hydrology, air quality (in particular, airborne nitrogen deposition and dust), light and noise disturbance, and ecological connectivity	The Applicant is continuing to engage with Suffolk Wildlife Trust and other ecology stakeholders, to provide further information, where necessary. Refer to [**REP3-015**] Construction Environmental Management Plan (Appendix 16C) for further details of mitigation and management measures included during the construction phase. Refer to [**REP2-031**] Operation Environmental Management Plan (Appendix 16F) for further details of mitigation and management measures included during the operation phase. Also, further information was provided in the update to the HRA submitted at Deadline 3 [**REP3-009**]. In any event, notwithstanding this position, as set out in the Heritage and Substation Connection Update, for heritage reasons the Applicant has now determined to remove Sunnica West B from the Scheme, which would avoid ecological impacts arising from that site.
			Impacts on invertebrates which lay their eggs in water, including several nationally rare species There is insufficient evidence at present to inform a reasonable assessment of the likely scale of any impact of this effect at a population level on the affected invertebrate populations of Chippenham Fen and Snailwell Poor's Fen SSSI and the Fenland SAC, as well as Snailwell Meadows SSSI, but there is the potential for this to be significant. There is currently insufficient evidence that construction and operation of solar arrays at W01 and W02, and the cable corridor close to this cluster of designated fenland sites will not have significant	A Technical Note in relation to aquatic invertebrates has been provided by the Applicant at Deadline 2 [**REP2-038**] which sets out further evidence to support the Applicant's conclusions that no significant effects to such species would arise from the Scheme. In any event, notwithstanding this position, as set out in the Heritage and Substation Connection Update, for heritage reasons the Applicant has now determined to remove Sunnica West B from the Scheme, which would avoid ecological impacts arising from that site.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
			adverse impacts on these sites, their designated features, and/or associated species assemblages, and our ability to enhance and restore nature and ecological networks in the surrounding landscape.	
			Impacts on County Wildlife Sites (CWS). Potential for cable crossing through Havacre Meadows and Deal Nook CWS to have adverse impacts on the site Any deterioration in condition of CWS will adversely affect biodiversity and wildlife, and the contribution of CWS to maintaining ecological connectivity and acting as stepping-stones for nature through the landscape. SWT would like habitats and features of CWS within the scheme boundary to be prioritized for enhancement through the creation and implementation of management plans. Potential for cable crossing through Havacre Meadows and Deal Nook CWS to have adverse impacts on the site.	CWSs to be indicated as retained and enhanced ecological features on the landscape masterplan in updates to the OLEMP at Deadline 3. The detailed LEMPs will consider management measures for the CWSs within the scheme boundary pursuant to the commitments in the FCEMP and OLEMP. Table 8-9 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [**APP-040**] considers the impacts of the Scheme on Havacre Meadows and Deal Nook CWS. There will be no directs 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 [**REP3-015**]. 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.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				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. Furthermore as a starting point, the Framework CEMP requires that "*Existing designated sites within the Order land will be avoided and measures embedded within the Scheme design will ensure that they are not affected during construction e.g. through siting construction routes away from designated sites and buffer zones".*

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
			Impacts on stone-curlew and land functionally linked to the Breckland Special Protection Area SWT is concerned that construction and maintenance activities within operational areas of the development will reduce suitability for stone-curlew nesting. SWT notes that the surveys undertaken in 2019, 2020 and 2021 were subject to limitations and therefore, may not be an accurate representation of the use of the area by stone-curlew. SWT note that the potential for construction disturbance on stone-curlew within 1.5km of nesting locations or newly created habitats during the breeding season is assessed in the ES chapter. However, the measures proposed are focused on stone-curlew within the DCO site and do not attempt to mitigate effects on stone-curlew which may nest within 1.5km of the DCO site. SWT request further clarification from the Applicant on how they have established that there will be no significant cumulative effects from the Scheme in combination with other developments.	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

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				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**.** 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 [**REP3-015**] and will be secured through the detailed CEMP; and similarly in the operational phase through the Operation Environmental Management Plan. 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

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				delivery of habitat creation and nesting plot opportunities and allow efficient management. As the Scheme has embedded sufficient areas to offset any net loss of Stone Curlew breeding and foraging habitat within the Order limits, there will be no effect, significant or not to act in combination with other schemes. It has been assumed that it will be the responsibility of other projects and plans to ensure similar measures to avoid or limit effects on stone curlew, and that any effect, even if not significant will be considered in the relevant application. The full long list of cumulative development has been discussed and agreed with West Suffolk Council (WSC) and East Cambridgeshire District Council (ECDC). The schemes in Table 4-3 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [**APP-040**] were given particular consideration owing to their proximity to the Scheme, application status and potential for cumulative effects, due to similar impacts on European sites.
			Impacts on arable flora and the unique Brecks plant communities Insufficient evidence from surveys to understand the full impacts of the scheme on arable flora and Brecks plant communities. Insufficient detail on proposed mitigation for any loss of these habitats and communities to provide confidence that there will not be any residual adverse impacts.	The Applicant is working with SWT to understand what further evidence is required.
			Impacts on wintering birds, breeding birds, bats and badgers Surveys and monitoring for these protected species groups is incomplete and not sufficient to inform a full	The Applicant disagrees that further surveys and monitoring are required for these protected species groups to inform the assessment presented in Chapter 8: Ecology and Nature Conservation of the Environmental Statement [**APP-040**].

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			assessment of likely impacts. SWT would like to see monitoring expanded to provide sufficient evidence to support assessments of the likely impacts to these receptors from the scheme	Surveys have followed the relevant best practice guidelines, with 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**].
			I**mpacts on ecological connectivity and nature recovery** The potential for barrier effects from the construction and fencing of solar array areas to impinge on the movement of wildlife through the landscape between high value habitats and designated sites. Impacts on the potential for restoration and recovery of habitat in the area between Chippenham Fen and Snailwell Meadows and along the valley of the River Snail, contributing to emerging Nature Recovery Networks in East Cambridgeshire and West Suffolk.	The Applicant considers that the detail on these design elements for the different habitats proposed in relation to connectivity will be provided at the detailed LEMP stage in line with the principles set out in the OLEMP. However, the Framework CEMP was updated at Deadline 2 and Deadline 3 to provide for further principles in relation to fencing allowing for wildlife movements [**REP3-015**].
			Impacts on chalk streams and other freshwater ecosystems Lack of evidence to inform the assessment of likely impacts on chalk streams and other freshwater ecosystems, for example detailed hydrological investigations to assess impacts of cable crossings. Insufficient setback between Lee Brook and solar arrays in E03 and E05. Insufficient Biodiversity Net Gain for rivers and watercourses is indicated by the BNG report.	The potential for adverse impacts on all watercourses, both Main Rivers and ordinary watercourses, has been assessed within Chapter 9: Flood Risk, Drainage and Water Resources of the Environment Statement [**APP-041**]. The majority of watercourse will be crossed by non-intrusive techniques to avoid any flow changes or impacts on the bed and banks of these watercourses. Additionally, there will be no permanent above ground construction for the location of solar panels within the 10 m buffer zone from the edge of the typical channel / water's edge of watercourses. New River (Channel W10), and a tributary to New River (W11), are the only chalk streams within the Study Area. Both of these

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			Potential for restoration and enhancement of watercourses and floodplains as part of the emerging Nature Recovery Network has received insufficient consideration in the location of the solar arrays adjacent to natural watercourses including the River Snail, River Kennett and Lee Brook, and in the design of ecological mitigation and enhancement measures for the scheme.	will be crossed using Non-intrusive methods. This is secured within the Regulation 14 of the Framework CEMP [**REP3-015**]. The assessment concludes that with the embedded mitigation (secured pursuant to the Framework CEMP [**REP3-015**] there would be no significant effects on all surface watercourses within the area of the Scheme. Please refer to our response to Q1.11.25 [**REP2-037**] for the commitments to providing enhancement of WFD watercourses. Detail on the design elements for the different habitats proposed in relation to connectivity will be provided at the detailed LEMP stage.
			Impacts of cabling route through the ecological mitigation area ECO4 Potential for hydrological impacts from cabling on adjacent fen habitats (Fenland SAC / Chippenham Fen Ramsar / Chippenham Fen & Snailwell Poor's Fen SSSI)	The Applicant considers that this information has been provided in the application documentation. The HRA was also updated at Deadline 3 to account for ExA comments on impacts to the Fen [**REP3-009**]. With the proposed removal of Sunnica West B, such impacts would be avoided from that site.
			Biodiversity Net Gain BNG report is incomplete and inadequate to assess the BNG the scheme can be expected to deliver. Specific issues include but not limited to: • Phase 1 survey used to assess existing habitat baseline is not adequate. UK Habs classification and methodology should be used. • Habitat creation/ enhancement for mitigation can only count toward No Net Loss and must be presented separately from that counted towards gains beyond NNL.	The Biodiversity Net Gain report submitted with the DCO followed the best practice guidelines at the time of writing. The Applicant acknowledges that the process of assessing biodiversity net gain is rapidly evolving and in recognition of this has committed to providing an update assessment, including all relevant material to allow consultees to consider fully the findings of the assessment. As such, the Applicant confirms that a new BNG report using V3.1 of the Defra metric is being prepared and will be submitted to Examination in due course including the relevant calculations spreadsheets and habitat mapping and detail as to how habitats have been accounted for in the calculations.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
			• Predicted BNG for rivers and ditches is only 1%. This should be increased to 10% minimum through design and delivery of restoration and enhancement measures.	Opportunities for increasing net gain in river units will also be considered.
			Habitat creation The Applicant's assessment of the likelihood of significant effects from the Scheme is highly dependent on the success of the habitat creation within the mitigation areas, as well as the successful creation of species rich grassland and field margins for arable flora within the solar arrays.	Mechanisms for creating and/or maintaining and securing habitats for the duration of the scheme need to be agreed along with details of monitoring for habitats and species – this will form part of the detailed LEMP, which will be consistent with the principles set out in the OLEMP. Detailed establishment and management plans for the different habitats proposed in the mitigation areas will be provided at the detailed LEMP stage.
			Framework Construction Environmental Management Plan (CEMP) The level of detail of the Framework CEMP is not sufficient.	A detailed CEMP will be provided at the detailed CEMP stage covering precautionary working methods for avoiding impacts on ecological features during the construction phase of development. The Framework CEMP has developed through the Examination, so the Applicant welcome any feedback on what additional information could be incorporated given the current stage in design development.
			Decommissioning Uncertainty surrounding the decommissioning of the site and the retention of the created habitats in perpetuity, also creates doubts about the long-term retention of any benefits resulting from the scheme's proposed enhancements for wildlife and 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 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. It will be the role of the Ecology Advisory Group to explore with landowners (who will retain ultimate

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				discretion) potential routes and mechanisms for securing the habitats created and enhanced as part of the delivery of the scheme beyond its operational lifetime.
			Outline Landscape and Ecology Management Plan (LEMP) Lack of detail within the Outline LEMP. The full LEMP should be produced early in order to inform the inspectors decision.	The OLEMP sets out the framework for the landscape and ecology management details to be secured within the consent order. This has been expanded upon as much as possible at this point in time (including new Environmental Masterplans) in the OLEMP submitted at Deadline 3 [**REP3-011**]. It is not possible to produce the full LEMP at this stage as detailed design will only follow should the DCO be approved. It is a Requirement of the DCO that a full LEMP is provided, and agreed in writing, by the host authorities at the detailed design stage.
			Monitoring and Evaluation For there to be greater certainty as to the effectiveness of mitigation and enhancement measures it will be necessary for more detailed monitoring of ecological impacts to take place than is currently proposed.	Detailed monitoring for the different habitats proposed in the mitigation areas will be provided at the detailed LEMP stage. This monitoring will inform adaptive management of mitigation and enhancement areas, in particular for the ecological features mentioned above. In doing so, the Applicant will work closely with the Ecology Advisory Group, as set out in the updated LEMP submitted at Deadline 3 [**REP3-011**].

2.20 REP2-252 The British Horse Society

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
REP2-252	Environment - Transport		New paths should be permanent PRoW, not just permissive path	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. 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 made available for public use before the final commissioning of the phase of the development to which they relate.
			Closures should be reduced in length or managed	We can confirm any PRoW closures will be made public as part of the Communication Strategy, as provided for in the updated Framework Construction Environmental Management Plan

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				submitted at Deadline 2 [**REP2-026**]. This is secured via Requirement 14 of the draft DCO. However, the closures identified are considered the worst-case scenario for the purposes of the EIA. The contractor will assess each of the proposed PRoW closures to consider if the PRoW can remain open to the public in a safe and controlled manner. Through discussions with the Local Highway Authorities, it is understood that their preference is to avoid PRoW closures where they are required for vehicles to cross the PRoW, with the preferred method to be the use of marshals (banksman/banks person) to enable uses of the PRoW to cross the point the closure is required. This is supported by the Applicant, however, the contractor will make the final decision as to whether marshals can be used, and this will be decided on a case-by-case basis based on health and safety of workers and users of the public rights of way. As such, the ES assesses temporary closures, rather than managed crossings, for the purpose of a robust assessment, i.e. a worst-case scenario. Further clarification and details on the management of the PRoW closures are provided in the Transportation Technical Note [**REP2-041**] submitted at Deadline 2.
			PRoW should be adequately reinstated	Chapter 7 (paragraph 7.2.14) of the Framework Construction Traffic Management Plan and Travel Plan [**REP3-013**] includes a requirement to undertake conditional surveys before, during and after construction to identify damage caused by the construction of the scheme, and to remediate such damages on the highway and PRoWs.
			Works near PRoW should be managed to ensure equestrians can still use the routes safely with construction works going on in close proximity.	The construction HSE process will include measures to ensure that equestrians can still use the PRoWs with construction works going on in close proximity, unless they have been closed temporarily for the safety reasons discussed above, while specific works are being undertaken.

2.21 REP2-260 West Suffolk Council

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
REP2-260	Environment - Water		The council supports the County Councils as the Lead Local Flood Authorities in their request to be provided with sufficient evidence to demonstrate that a suitable drainage solution can be delivered as the information accompanying the application lacks required information.	The Applicant notes the response of the LLFA [**WR-148**] that "*The council agrees that the implementation of high quality SuDS measures can be decided in the post-consent phase of the project through requirements*." The Drainage Strategy is included as Annex F to the FRA [**AS-010**]. Planning policy and drainage design updates to include FEH rainfall data in the calculations have been included within an FRA Addendum which is to be submitted to the examination in due course, following completion of the Environment Agency's review.
REP2-260	Environment - FRA		See above	See above
REP2-260	Environment - Landscape and Visual		The Applicant has, as part of the ES, submitted a landscape and visual impact assessment. The ES predicts significant effects as a result of the proposals across the DCO site during construction, operation and decommissioning. The ES highlights significant visual effect from the proposals when viewed from the surrounding countryside. By year 15 (when mitigation planting will have begun to mature), the ES predicts that the visual effects would persist but would have reduced to the extent they are not significant. The Council does not agree that the visual effects of the proposals at year 15 can be dismissed and that the accumulation of residual effects in combination would be significant. The applicant has failed to recognise and embrace the fact that the scale of these proposals go far beyond any other solar plant within the UK and create their own landscape. It is paramount that this new landscape is designed to an exemplary standard through high quality design and robust mitigation that	The Landscape and Visual Impact Assessment (LVIA) summarised in Chapter 10 of the Environmental Statement (ES) [**APP-042**] and supported by associated appendices and figures provides a detailed and robust assessment of the likely significant effects on the landscape and people's views of the landscape. The Applicant disagrees that the significance of residual visual effects are higher than those assessed in the ES. The Scheme has been designed to avoid and minimise effects on the landscape and people's views and visual amenity, as described in the Design and Access Statement (DAS) [**APP-264**] and the Outline Landscape and Ecology Management Plan (OLEMP) [**REP3-011**]. It is low-lying and the topography is flat or gently undulating with a framework of existing vegetation, maximising opportunities for integration. NPS EN-1 recognises that virtually all nationally significant infrastructure projects will have effects on the landscape and that the aim should be to minimise these, providing reasonable mitigation where possible and appropriate. The Applicant does not agree that the Scheme will be the feature that defines or creates a new landscape.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
			is demonstrably deliverable. The Council considers that the mitigation proposed will not have the desired effect in all areas and mitigation planting to screen the development in some areas of open landscape can have its own adverse impact.	The design principles in the Application demonstrate good design in terms of siting relative to existing landscape character, landform and vegetation, this is demonstrated further by the Environmental Masterplans [**REP3-022**] and the updated LEMP submitted at Deadline 3 [**REP3-011**]. The substantial areas of woodland planting (52ha) and hedgerow planting and enhancement (7.4km) proposed will reinforce the existing landscape framework, further increasing the capacity of the landscape to accommodate the change. This planting will also be effective in further limiting the visual impacts of the built elements of the Scheme such that most effects will not be significant by year 15 of operation. The changes proposed are not irrevocable and these enhancements to the green infrastructure and biodiversity of the landscape will be left when the Scheme is decommissioned and the residual adverse impacts are reversed.
REP2-260	Environment - Socio-economics	4.11 – 4.13	The Council is concerned that the Applicant's socio-economic assessment is inadequate, given substantial concerns about its methodology, the use of unrealistic assumptions and invalid conclusions. The Council recognises that the scheme has the potential to generate local employment and local investment opportunities, particularly during the construction and decommissioning phases, however, overall concerns remain that the scheme will have a negative impact on the local economy in relation to several key areas. Of note is the fact that the construction of the scheme requires a significant workforce and, while the Applicant expects a large majority of the workforce to be sourced locally, this is likely to have an impact on other construction projects taking place in the area at the same time.	The Applicant's response to paragraphs 12.17 to 12.22 and 12.39 in Chapter 12 of the Applicant's Response to the Local Impact Report [**REP3-019**] as submitted at Deadline 3 provides a detailed response and explains that discussions are underway with the local planning authorities on the assessment and will be taken forward in the SOCG.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
REP2-260	Environment - Socio-economics	4.14 – 4.15	The Council shares the concerns raised by the horse racing industry that the scheme could affect the level of investment in the town and deter potential owners and trainers who will view the area as being blighted by an industrial project of the scale proposed including because parts of the Scheme will be visible from Limekilns gallops.	A Horseracing Industry Impact Assessment [**REP2-040**] has been submitted by the Applicant. This concludes that there are no compelling reasons to show that the horseracing industry will be impacted detrimentally in its operations or longer term viability as a result of the Scheme.
REP2-260	Environment – Soils (agriculture)	3.3 - f 4.16	Agricultural land – Soil health and land productivity Food security	The soil health benefits of reverting arable land to pasture are well understood, as are the soil health challenges of continuous arable cultivation. The current use of the land is not a relevant consideration in terms of policy requirements, and it is the use of Best and Most Versatile Land (BMVL) that should be examined given it is BMVL that falls within planning policy and specifically the Energy NPSs, draft Energy NPSs and the NPPF. MAFF ALC guidelines direct that ALC grades are defined by reference to physical characteristics, grading guidance and cut off limitations. Natural England document TIN049 also notes that current agricultural use or intensity of use does not affect ALC Grade. The site has light textured and shallow soils, with a relatively warm and dry climate. Drought imposes a substantial constraint on the quality and versatility of this agricultural land. On food security, the Applicant has already set out in its response at Procedural Deadline B [**PDB-001**] why food security/production is not a principal issue for consideration in the examination, but instead it is the use of best and most versatile (BMV) land that should be examined given it is BMV land that falls within planning policy and specifically the Energy NPSs, draft Energy NPSs and the NPPF. 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

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				generation schemes. This is a conscious decision by Government.
REP2-260	Environment - Socio-economics	4.17	The impact of the proposal on the attractiveness of West Suffolk as a tourist destination is also of concern to the Council. The industrialisation of the landscape and impacts on public rights of way has the potential to deter visitors, with a direct impact on the local economy.	The Applicant's response to paragraphs 12.58, 12.59, 12.60, 12.61 and 12.81 in Chapter 12 of the Applicant's Response to the Local Impact Report [**REP3-019**] as submitted at Deadline 3 explains how potential effects on tourists, and particularly views and use of PRoWs, were assessed in the Environmental Statement. 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 of the ES [**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 on these receptors. The assessment concluded that there would be no significant effects.
REP2-260	Environment - Transport	4.18	References Suffolk County Council concerns.	Whilst there are a number of points of disagreement, the Applicant notes 13.2 of the Local Impact Report (LIR) [**REP1-024**], which states "*The Councils consider that many of these issues could be resolved, by the Applicant establishing the extent of likely impacts, and those being capable of being resolved through suitable mitigation*." The Applicant respectfully disagrees with the LHAs position on the acceptability of the submitted material, but notes that agreement is achievable subject to addressing the LHA's concerns. The differences in position are set out in detail in the LIR, and the Applicant's response to the LIR [**REP3-019**]. Notwithstanding this, we are working with the LHAs to resolve a number of differences, which includes further details and

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				clarifications regarding the site accesses and highway works which will be provided within an update to the Framework Construction Traffic Management Plan and Travel Plan [**AS-300, AS-301**] that the Applicant proposes to submit at Deadline 3A.
		4.19	General for all bullets	The WSC response references concerns regarding congestion impacts on the local highway network. Chapter 7 of the Framework Construction Traffic Management Plan and Travel Plan [**REP3-013**] sets out significant embedded mitigation. As part of the embedded mitigation for the scheme, the construction staff will travel to / from the site at 0600-0700 hours, and 1900-2000 hours respectively. This is outside of the highway network peak hours in order to avoid peak time capacity impacts, representing an efficient use of the highways network. The working hours are secured under the draft DCO, with reference to requirement 14 relating to the Construction Environmental Management Plan [REP3-016]]. The FCTMP/TP also establishes HGV timing restrictions, including that there will be no arrivals or departures on a Weekday between 08:00 and 09:00, and between 17:00 and 18:00. WSC references the need for mitigation in multiple bullet points at paragraph 4.19. Table 13-33 in the Transport and Access chapter of the ES [**APP-045**] details that peak construction period traffic will not result in significant effects for vehicle travellers in terms of driver delay, accidents and safety. In addition, the peak construction traffic will not result in significant effects on Non-Motorised Users (NMUs) in terms of severance, pedestrian delay, pedestrian/cycle amenity, fear and intimidation and accidents and safety. Therefore mitigation, over and above that secured in the Framework Construction Traffic Management Plan and Travel Plan [**REP3-013**], in the form of embedded mitigation, is not required.
		4.19	A11 Slip Road junction with Elms Road. Further detail should be provided on mitigation proposals to	A junction capacity assessment has been undertaken at the A11 Northbound off-slip / Elms Road T-Junction which is presented in

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
			mitigate traffic from the development queuing on the B1085.	Section 4 of Transportation Technical Note [**REP2-041**] submitted at Deadline 2 and no capacity issues were identified with the junction forecast to operate well within capacity within the development peak hours between 06:00-07:00 and 19:00-20:00. The Applicant has committed for sections of Elms Road to be widened up to 7.2m width. This is set out in the Transportation Technical Note [**REP2-041**], and will be included in an update to the Framework Construction Traffic Management Plan and Travel Plan [**REP3-014]** which will be submitted at Deadline 3A. The highway works proposed on Elms Road are to provide safe passage for two-way HGV movements in the interest of safety to the construction workers and the public. This is based on swept path analysis of two HGVs passing another.
			Red Lodge Dumbells. The council requires assurance that access for residents and emergency vehicles will not be impacted, and necessary mitigation must be delivered.	As set out in the Transport Assessment [**APP-117**], the 'Forest Heath Site Allocation Plan Cumulative Impact Study' indicates that the Red Lodge Dumbbell Roundabouts are forecast to operate within capacity at between 40% to 50% of capacity in 2031 in the AM and PM network peak hours including the background growth in traffic flows that would occur between the Sunnica assessment year of 2023 and 2031. The 2023 highway network peak hour (08:00-09:00 and 17:00-18:00) flows are forecast to be higher than the 2023 development peak hour flows with the additional construction traffic. The 2031 network peak hours traffic flows are therefore higher than the 2023 development peak hour traffic flows where the Red Lodge Dumbbell Roundabouts are forecast to operate within capacity. Therefore, it is considered that the Dumbbell Roundabouts have enough residual capacity, which includes queuing, to operate efficiently with the additional staff vehicles between 06:00-07:00 and 19:00-20:00 during 2023 given the residual capacity at the roundabouts. The Applicant considers there is therefore no need to deliver further mitigation.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
			B1085 Newmarket Road Worlington to Golf Links Road. The junction is unsuitable for use by HGV/AIL SCC has declared the road as unsuitable for HGV traffic.	Following the pre-application consultation process the need for HGVs to travel along Golf Links Road has been removed during the construction period. HGVs are not required along Golf Links Road during the operational period and maintenance will be undertaken using smaller vehicles during the operational phase, if and when required. The HGV routes are established within the Framework Construction Traffic Management Plan and Travel Plan [**REP3-013**].
			B1085 Newmarket Road Worlington T Junction. Concerns regarding turning movements, mounting the pavement. Insufficient detail re an AIL Impact of A11 closure	The Applicant has agreed with the local highway authority to escort HGVs through the Newmarket Road/Freckenham Road T-Junction within Worlington to safe passage of vehicles and the safety of the public. As identified within the bullet points in 4.19, the junction is physically capable of accommodating large vehicles at the junction as stated that existing large vehicles make this turn which are not related to the development. Swept path analysis of the Abnormal Indivisible Load (AIL) routes are provided within the Framework Construction Traffic Management Plan and Travel Plan [**REP3-013**] and the AIL is not proposed to use the T-Junction within Worlington. In the infrequent event of an A11 closure, Sunnica traffic will need to follow the diversions established by National Highways and the Local Highways Authorities. Any diversions and traffic management that National Highways put in place for any works on the Strategic Road Network need to be suitable to accommodate all traffic on the network, of which the proportion associated with Sunnica is minimal. It is therefore reasonable to conclude that the use of any diversionary routes would not result in additional impacts requiring assessment.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
			A11 Slip onto Newmarket Road. unclear whether application documents consider the volume of traffic using the slip road. No account of queueing on the A11 and further survey work must be undertaken.	Sunnica East Site B: Site Access I located on Newmarket Road between Golf Links Road and the A11 is a proposed HGV access for the construction of the scheme. HGVs will use the A11/Newmarket Road junction to travel to this site access. There is no baseline data available for Newmarket Road or the slip roads to determine the existing traffic conditions at this location. As detailed in Table 6-3 of the Transport Assessment [**APP-117**] Sunnica East Site B: Site Access I is only forecast to be used for the first 13 months of the construction period with a maximum of 12 HGVs per day, which equates to approximately one HGV per hour over a 10 hour delivery window. On average five daily HGVs are forecast to use this site access in the first 13 months of construction. Therefore, due to the low number of HGVs forecast to use this access over the construction period, the scheme is not anticipated to have a significant impact on the A11 slip roads at this location. The Applicant has undertaken consultation with National Highways regarding the use of the A11/Newmarket Road junction (located in close proximity to Golf Links Road). National Highways has agreed that development related vehicles can use this junction, but will only be permitted to turn left in and left out at the junction. A Stage 1 Road Safety Audit was carried out at the request of the local highway authority and a summary is provided within the Framework Construction Traffic Management Plan and Travel Plan [**AS-300, AS-301**]. The Stage 1 Road Safety Audit was carried out in accordance with the DMRB GG119 guidance and identified that a signage strategy should be provided to warn motorists of the construction site access which is located on Newmarket Road. The Applicant is committed to providing the signage strategy in line with the recommendations within the Stage 1 Road Safety Audit – see paragraph 5.11.4 of the

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				Framework Construction Traffic Management Plan and Travel Plan.
			A11 Gap Closures between Red Lodge and Fiveways. This will affect all traffic and the travel routes will no longer be usable. Impact of proposed closures should be explored in detail and the information shared with District and County Authorities.	National Highways has made the Applicant aware of plans for gap closures of the A11 between Red Lodge and Fiveways. The proposed scheme consists of three gap closures and is scheduled for 2022-2023. Given the scheduling of this scheme, it is likely to be complete prior to commencement of construction. The HGV routes identified within the Framework Construction Traffic Management Plan and Travel Plan [**REP3-013**] do not use any gaps in the central reserve, and therefore this will not affect construction traffic.
			Access D and H. close proximity of two access points, in relation to control of traffic movements and the ability of other traffic including NMU to safely navigate at peak times.	The proposed site accesses on Newmarket Road are proposed to be controlled by temporary traffic signals and temporary speed limit reductions to control the movement of vehicles in and out of the site accesses in the interest of ensuring safe passage of vehicles and ensuring the safety of the public. The proposed temporary traffic measures are outlined in the Traffic Regulation Measures Plans [**REP2-010**, **REP2-011**]. Site Access H on Newmarket Road will not be retained for use within the operational phase whereas Site Access D on Newmarket Road is an existing access to the field and will be retained for infrequent access by staff for maintenance purposes during the operational phase. The number of HGVs forecast to use these accesses are outlined in the Transport Assessment [**APP-117**] which identify a low number of vehicles to use the site accesses for a short period of time. Further controls and measures relating to HGVs are outlined in the Framework Construction Traffic Management Plan and Travel Plan [**REP3-014**]. This includes clarifications made at Deadline 3 to provide confidence that inbound HGVs will not need to wait in the public highway for an outbound HGV to pass.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
		4.20	Worlington Quarry is subject to rigorous controls re wheel washing and road sweeping to ensure that mud does not enter and remain on the highways, causing a risk to safety. Measures must be implemented.	The Applicant has committed to wheel washing facilities to prevent mud or material being tracked onto the local highway network as detailed in paragraph 7.2.17 of the Framework Construction Traffic and Management Plan and Travel Plan [**REP3-014**].
REP2-260	Environment – BESS – Fire Safety		The Council has very grave concerns regarding the lack of detail provided by the Applicant in relation to the BESSs and the implications of a fire within the battery compounds, particularly in relation to public safety. The BESS shown at E33 within Sunnica East B is located very close to a site occupied by a number of traveller families and just 500m from the village of Red Lodge that has a population of approximately 6,000. The Suffolk Fire & Rescue Service has engaged with the Applicant from an operational firefighting point of view only and has openly acknowledged that there is very little guidance or legislation on this topic given that it is a relatively new technology. The Council is aware of a number of fires in relation to similar systems within the UK and abroad and is acutely aware of the very real risk of an incident occurring. The Council considers that detailed proposals of the BESSs should be submitted by the Applicant at this stage to allow a full and open discussion on the appropriateness of accommodating what appear to be very large systems into the scheme. This discussion is necessary prior to any decision being taken on the merits of the proposal.	In recognition of the concerns raised by interested parties the Applicant has updated the outline Battery Fire Safety Management Plan (BFSMP) [**REP2-032**] and submitted it for Deadline 2. It is considered this provides a detailed plan which ensures that the final design of the BESS will be acceptable and that in the unlikely event of a fire it would be managed safely ensuring the safety of site staff, first responders and the wider community. The Applicant's BESS fire safety team has studied many of the global BESS incident reports to help inform red flags for the Sunnica BESS design template and to establish key safety protocols to inform drafting of Emergency Response Planning (ERP) documentation at the detailed design stage. As stated in the outline BFSMP the BESS system selected for Sunnica will have completed UL 9540A testing which defines and quantifies gas emissions produced during thermal runaway. This data will then be used for specific BESS consequence modelling for the Sunnica site. A key priority of this dispersion modelling is to ensure that respondent exposure to any level of emissions from a BESS thermal runaway incident are minimised and the ERP provides clear alert protocols and safety guidelines. The Applicant will be working very closely with the Suffolk Fire & Rescue Service to ensure that the Sunnica site design meets all first responder requirements and complies with the highest global and national BESS safety and certification standards. At the BESS detailed design selection stage all relevant authorities

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				will have the opportunity to review equipment and site design specifications.
REP2-260	Environment - Noise	4.25	The nature, size and duration of the construction phase of this development is likely to cause complaints of adverse effect on nearby sensitive receptors in relation to noise and vibration (with similar effects being felt at the decommissioning stage).	Chapter 11, Noise and Vibration of the Environmental Statement [**APP-043**] assesses the potential effects of the Scheme due to noise and vibration during the construction and decommissioning phases. Temporary, residual construction and decommissioning noise and vibration effects were identified as, at worst, Minor Adverse and not significant. Although, construction noise effects are identified as not significant, this does necessarily not mean that complaint will not be received. A display board will be installed on-site and a website will be set up. These will include contact details for the Site Manager or alternative public interface with whom complaints can be lodged. The Section 61 process will be followed to obtain consent to carry out construction works. This process will define how best practicable means is adopted to ensure that construction noise will be reduced as far as reasonably practicable.

2.22 REP2-263 Worlington Parish Council

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
REP2-263	Planning	4.0	Conflict between the Scheme and Bay Farm Anaerobic Digestion Plant in relation to the provision of feedstock and the disposal of digestate.	As per the paragraphs 4.1.21 – 4.1.28 of the Applicant's Written Summary of Sunnica Limited's Oral Submissions at Development Consent Order Issue Specific Hearing on 1 November 2022 [**REP2-036**], there is no conflict between the Scheme and the planning permission for the AD Plant at Worlington in relation to the ability of the AD Plant to source feedstock. Regarding disposal of digestate, the extant planning permission for the Bay Farm Anaerobic Digestion Plant is DC/21/1535/VAR. The planning permission does not place any restriction on the geographical location to where digestate may be disposed.
REP2-263	Environment - Ecology	6.1	**Chalk streams and riverside** WPC believe the River Lark and an area known as the Hythe will be affected by the installation and ongoing maintenance of the development, including water extraction and run off at BESS Site E33 and the surrounding solar panel locations.	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.
		6.4	**Impacts on stone curlews** The birds are very sensitive to disturbance and the Sunnica plans, which will involve 2 years of construction with heavy lorries and numerous vehicles in the area along with piling steel supports into the chalk subsoil, which is likely to be exceedingly noisy, may completely disrupt the birds and damage their success.	There will be potential adverse impacts to nesting bird species, including specially protected species (such as Stone-curlew) due to temporary and permanent loss of habitat and noise and visual disturbance during construction. Mitigation measures will be implemented to minimise the impact of the scheme on this species.

				Stone Curlew has a fluid distribution within the farming landscape of the Order limits and surrounding area and 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 such the nesting locations can vary annually depending on this availability. The Scheme has taken this fluid nesting distribution into consideration and sought to avoid blocks of land where regular nesting attempts have been observed *e.g.,* those in ECO3. This principal of avoidance has guided the locations of the offsetting areas which have taken into account not only 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 maximise delivery of habitat creation and nesting plot opportunities and allow for efficient management. Over 100 ha of predominantly arable farmland have 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 ECO 3 of the Scheme design in Sunnica East Site B and these will form the basis of reverting adjacent areas in ECO 3 to semi-natural grassland, characteristic of the Breckland heaths. Monitoring of Stone Curlew prior to and during operation of the Scheme will establish whether the species is nesting within 500 m of the DCO site. Should this be found to be the case, then the same requirements, with regard to briefing staff and controlling works will be applied to any locations where there is potential for disturbance within the Stone Curlew breeding season (March to September inclusive) within the 500 m zone, that are already in included in the Framework OEMP [**REP2-030**] ES - Appendix 16F] for the offsetting areas.
		6.5	**Impacts on swifts**	No adverse effects on Swift are predicted. All areas currently supporting insect populations, e.g. grasslands, hedgerows,

			WPC has concerns about covering fields in panels will not help the swifts, and the native grasses which Sunnica insist will increase insect populations are likely to take several years to establish, during which time the swifts may move elsewhere or fail to breed.	woodlands, will be retained and conversion of the arable farmland to diverse grasslands, which will greatly enhance the availability of insect prey for swifts.
		6.6	**Impacts on bats** WPC has concerns about the effect on the local bat population during and after construction. Points of consideration include: • Installation noise and vibrations. • Effects on roosting. • Introduction of artificial lighting. • Disturbance to their food chain. • Fragmentation of habitat. • If bats corridor roost are severed bats can be cut off from their foraging habitats, making it harder for them to hunt and survive.	Mitigation measures will be undertaken to minimise impacts on bats. **Noise and vibration**: Vibration due to construction activities potentially causing annoyance at Noise Sensitive Receptors, including bats. Best Practicable Means (BPM) will be applied, as far as reasonably practicable, during construction works to minimise noise and vibration at noise sensitive receptors. Noise mitigation is secured through the Framework CEMP [**REP3-015**]. As the plant design is progressed, the specification of plant machinery with low noise emission and properly attenuated supply and extract terminations will help to minimise noise emissions. The use of enclosures, local screening, mufflers, and silencers will also be used as appropriate. Should the noise exhibit any such acoustic features then the relevant penalty/ correction should be applied in accordance with BS 4142. Plant such as the substation and batteries will be designed to have minimal tonal, impulsive or intermittent features. The detailed OEMP will also set out how the scheme design and operational plant levels have been developed to mitigate and reduce effects of noise and vibrations to a minimum during the operation phase of the scheme. 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. Site staff will carry out regular monitoring and maintenance of equipment. This will include identifying any changes in sound pitches or volume early and carrying out the relevant maintenance.

				Artificial lighting: 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. Controls on lighting/illumination to minimise visual intrusion and potential adverse effects on sensitive ecology, such as bats, will be considered as far as reasonably practicable. Temporary construction site lighting will be designed as far as reasonably practicable so as to minimise artificial light spill from the site. Lighting will be kept to a minimum during construction works. Construction working hours will be 7am until 7pm Monday to Saturday and during construction in the winter months, mobile lighting towers with a power output 8kVAs will be used. Any lighting required during the construction phase will be directed away from retained habitats and include hoods or cowls to direct light forwards into the construction areas. Throughout the Scheme, the use of motion detection security lighting to avoid permanent lighting is embedded in the Scheme design and the inward distribution of light will avoid light spill on to existing boundary features. 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. CCTV camera's will use infra-red technology removing the need for security lighting along the perimeter of the Sites. These matters are secured through the operation of the CEMP and OEMP. **Fragmentation of habitat:** The Scheme will avoid, as far as reasonably practicable, areas of high-quality habitat, such as mature trees and

				woodland/wetland habitats associated with Local Wildlife Sites (LWS) surrounding the Order limits. The impact avoidance approach allows for the retention of trees to ensure that the connectivity of the existing green infrastructure network is maintained. Careful consideration of the access points to limit the loss of vegetation at access points and the number of field boundary crossings. Where access and crossings are necessary, they have been carefully aligned to pass through the field access points and hedgerows where it would have the minimal impact on mature trees. The width of the access points will be minimised as far as possible to retain the landscape structure and habitat connectivity. All access points will be re-instated to their condition prior to the construction. Gaps in currently defunct hedges will be planted with suitable native species to improve habitat connectivity of with, 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 provide both screening from Scheme infrastructure and to improved habitat connectivity as well the 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. Habitats to be temporarily lost or damaged during construction will be fully reinstated on a like-for-like basis at the same location on completion of construction works, where practical. Some habitats will be restored and managed with the aim of increasing their biodiversity value in the long-term.
		6.7	**Great Crested Newts** EDNA surveys showed a positive result for GCN. The closest plot for construction would be E12 and is approximately 470m south of the 'Moat' site.	No Great Crested Newt were recorded within any of the waterbodies or watercourses surveyed within the Order limits during the Great Crested Newt surveys. Table 8-7 in Chapter 8: Ecology and Nature Conservation of the Environmental Statement [**APP-040**] states: '*There was one positive eDNA*

			WPC has concerns about two other sites possible highly suitable for GCN and have not been surveyed. • Site 1 highly suitable for GCN has not been surveyed located at around 80m to the scheme boundary. • Site 2 newts have been spotted and recorded in this garden over several years and is located at around 225m to the scheme boundary.	*result for GCN, from a waterbody in Worlington approximately 150m north of Sunnica East Site B. There are also unverified reports from Worlington residents of GCN in garden ponds. There is a population of GCN north of Sunnica East Site B (confirmed through positive eDNA) and this population likely uses suitable waterbodies and any seasonally available standing water in the vicinity of Worlington. There are a number of ditches on the southern side of Worlington, which if wet during early spring could be used by breeding GCN. At their closest these waterbodies are approximately 70m from the Order limits.'* Given, the distance between any potentially suitable waterbodies and developable areas of the Scheme, the ES accepts the presence of Great Crested Newt in Worlington, but concludes that the Scheme will not result in any significant adverse effects on the species and that no further surveys are required.
REP2-263	Environment - Landscape and Visual		Section 11 of REP2-263 sets out the views of Worlington Parish Council on the likely visual impacts of the Scheme. The parish council state that: • there will only be one road out of the village where panels or batteries will not be viewed. • The Scheme will effectively cut off and isolate Worlington from the countryside in which it sits and turn views into one of an industrial aspect • the proposed visual screening will be ineffective due to the lay of the land and will change/damage the Breckland landscape. • the development will not blend into the surroundings during the proposed 15 years for screening to establish or even over the lifetime of the Scheme.	**Visual impacts on road users** The main road through Worlington is the B1102, connecting the village with Mildenhall to the north east and Fordham via Freckenham to the south west. The closest area of solar panel arrays to the B1102 will be within parcel E12 in Sunnica East Site A. These panels would be visible for a short section of approximately 250m of the route on leaving the village travelling west in oblique views to the south, approximately 570m away beyond the new native grassland in ECO3 and a hedgerow along the edge of the parcel. Existing vegetation and buildings would screen views further west. These views are illustrated by the photomontages shown in Figure 10-94 [**APP-224**]. A section of Golf Links Road between the A11 trunk road and the Royal Worlington and Newmarket Golf Courses would lie adjacent to parcels E30, E31 and E32. Golf Links Road is lined by mature vegetation and recent planting on its southern side. This vegetation will be further strengthened by a belt of woodland running parallel with the road, screening the solar farm development in oblique views along the narrow lane.

				Views across parcels E24 and E25 on entering Worlington along Newmarket Road from the south would be more open in the early years of operation due to the slight rise in topography. Woodland planting, connecting with existing woodland blocks to the west would integrate and screen these panels by year 15 of operation. Panels in parcels E26 and E28 would be screened by the existing dense woodland which lines the road. **Isolation of Worlington from the surrounding countryside** The Applicant disagrees that the Scheme will cut off and isolate Worlington from the countryside. It is important to first note that no part of the Scheme is proposed to the north of the village. Furthermore, whilst the Order limits extend to the southern boundary of the village, the works in these areas relate largely to the extensive habitat creation and enhancement proposed. This includes new woodland and permissive paths, which will enhance amenity and public access to the countryside. The closest dwelling within the village would be located approximately 250m from solar panel arrays in parcel E24, beyond existing vegetation and proposed woodland. Approximately 0.5km separates the two parts of Sunnica East Site B, preserving an open gap extending south east.. Existing views south are broken up by belts of vegetation which divide fields. The LVIA acknowledges that there will be some views of parts of the Scheme from roads and public rights of way, particularly during construction and year 1 of operation. This existing vegetation and proposed planting means that views will be limited to parts of the Scheme and these will reduce substantially with the establishment of planting by year 15 of operation. **The proposed planting will be ineffective** Existing vegetation in the landscape south of Worlington, including planting carried out in the past 20 years, gives confidence that the planting proposed will establish well and will reinforce existing landscape patterns. An example of this is the woodland belt which now divides parcels E30 and E31. The Outline Landscape and Ecology Management Plan (OLEMP)

				has been updated for Deadline 3 [**REP3-011**] to provide further detail on the proposed planting, including species mixes which reflect local landscape character. **Landscape integration** The Scheme has been designed to integrate with the existing landscape pattern, by siting solar panel arrays and other built elements within existing fields. The loss of existing vegetation will be minimised and extensive planting which responds to the character of the Brecks landscape will further assist with landscape integration. The LVIA acknowledges that, despite this, significant effects of moderate significance, at the scale of the Sunnica East Site B itself and the wider LLCA 13: Estate Sandlands Mosaic, will remain at year 15 of operation.
REP2-263	Environment - Socio-economics	2.0	The Council provides a baseline profile of the community assets located within the Parish.	The Applicant acknowledges the baseline profile comments made. The Applicant's proposals seek to minimise the impact on the assets where relevant.
REP2-263	Environment - Socio-economics	2.5	The Council expresses concern that the scheme will impact public right of way (PRoW) Badlingham Lane U6006, changing what is a green space to an enclosed footpath.	Chapter 12: Socio-economics and Land Use of the Environmental Statement [**APP-044**] assesses the impact on PRoW, including unadopted bridleway U6006. The assessment identifies that users would experience temporary disruption during construction via temporary severance and subsequent diversion. The effect arising from this is assessed to be minor adverse at the Sunnica East Site B, which is not significant. The route would be reopened after construction and during operation, new permissive routes would be created which would link to PRoW U6006 at Sunnica East Site B, providing a safe route for local residents. This is assessed to have a minor beneficial effect.
REP2-263	Environment - Socio-economics	2.8	The Council expresses concern that Worlington Cricket Club will be affected by construction traffic and construction noise which will deter patrons.	A robust construction management plan will be implemented, with due consideration to be given to the management of construction traffic both in terms of the impact of vehicle movements upon the highway network and highway network users including local businesses to minimise delays and disruption. The Applicant has set out details of its approach to

				managing impacts from construction in the Framework Construction Traffic Management Plan and Travel Plan [**APP-118**], the approval and implementation of which is secured via a requirement to the DCO. As a result, no impacts are anticipated, and no associated economic costs are expected. The Framework Construction Environmental Management Plan (CEMP) [**REP3-015**] contains details on how best practicable means have been adopted to reduce construction noise effects as far as reasonably practicable. This is considered to be an appropriate level of mitigation based on the construction noise assessment showing no significant effects. Additionally, community engagement will be undertaken regarding the timings and duration of construction works as outlined in the Framework CEMP submitted at deadline 3.
REP2-263	Environment - Socio-economics	2.9	The Council and Royal Worlington and Newmarket Golf Club express concern that the scheme will have an adverse environmental and visual impact on the golf course.	Chapter 12: Socio-economics and Land Use of the Environmental Statement [**APP-044**] assesses the Scheme to have a minor adverse impact on golfers at the Royal Worlington Golf Club. This is not considered significant and will comprise of a subtle change to the composition of the existing view. As planting matures, this is anticipated to reduce to a negligible adverse impact by year 15 of operation. Further information on landscape planting is presented in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [**APP-042**]. Extensive mitigation and boundary treatments have been embedded within the Scheme to reduce its visual impact. This includes new woodland planting to the north and east of parcels E24 and E25 to screen the solar structures and additional hedgerow and woodland planting adjacent to Golf Links Road to screen views for motorists and from views from the wider landscape to the north of parcels E30-32. The solar panels within parcels E26-29 have been offset from boundary vegetation to retain the landscape pattern and screen the panels from wider views. The Applicant has set out proposed landscaping in Appendix 10I Outline Landscape and Ecology

				Management Plan submitted as part of the Environmental Statement [**APP-108**].
REP2-263	Environment - Transport	3.0	This is a list of the concerns that are covered in 3.1 to 3.9, with the additional comment that the Sunnica Energy Farm will continue to affect the community in the operational phase due to maintenance , repairs and replacement.	The summary list of concerns raised in 3.1 to 3.9 are responded to in the corresponding sections of this document. During the operational phase, only occasional and infrequent staff vehicle movements will be made which are associated with maintenance and therefore not forecast to have a significant impact on the local highway network. 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.
		3.1	Impact on Golf Links Road	Following the pre-application consultation process the need for HGVs to travel along Golf Links Road has been removed during the construction and decommissioning periods. HGVs are not required along Golf Links Road during the operational period and maintenance will be undertaken using smaller vehicles during the operational phase, if and when required. The HGV routes are established within the Framework Construction Traffic Management Plan and Travel Plan [**REP3-013**], which is secured by a requirement under the draft DCO.
		3.2-3.3	Not concerned about temporary speed limits, but are concerned about enforcements.	The enforcement of the temporary speed limit will be undertaken in the same manner as other permanent and temporary speed limits, through the Police. The Applicant has undertaken speed surveys specifically in relation to the proposed temporary speed limits at the request of the local highway authority and the

				results are presented within the chapter 6 of the Framework Construction Traffic Management Plan and Travel Plan [**REP3-013**]. The proposed temporary speed limits are part of a package of measures to provide safe entry and egress for the site accesses and for passage for the public. The temporary speed limits will be in place with the temporary traffic signals and signage strategy and as a package of measures will encourage lower speed limits in line with the temporary speed limit proposed along Newmarket Road. The signage will warn motorists of the upcoming temporary traffic signals and construction related vehicles. Whilst we appreciate the provision of WPC's speed data, the applicant has undertaken bespoke surveys in the locations required for specific purpose of determining appropriate temporary speed reductions.
		3.4	Temporary traffic lights. Add congestion, traffic lights at the same time, accident risk.	The construction site accesses on Newmarket Road are forecast to be used during the construction period (24 months) and therefore the temporary speed limit and temporary traffic signals on Newmarket Road shall be used too. The temporary traffic signals on Isleham Road are in relation to the construction of the cable corridor which is forecast for six months. The application of the temporary traffic signals will be implemented to provide safe access and egress of vehicles in and out of the site access. The Applicant holds safety with the utmost importance and will implement the temporary traffic management in accordance with the Traffic Signals Manual chapter 8 and the guidance on the use of portable vehicle signals as published by the Department for Transport. The signage and layout of temporary traffic regulation measures will be agreed with the relevant Local Authority in advance of implementation. This has been included in the updated Construction Traffic Management Plan and Travel Plan [**REP3-013**], submitted at Deadline 3, at paragraph 6.4.2.

		3.5	Road closures. Concern about diversions and impact.	Each of the road closures are associated with the construction of a site access or the construction of the cable corridor. The road closures are identified to ensure the safety of the construction workers and public. Each of the temporary road closures are expected to be no longer than one-week and occur on narrow roads where the use of two-way signals is not possible. Wherever possible, emergency vehicles, pedestrians and cyclists will be permitted to travel in both directions through the road closure. This has been included in the updated Construction Traffic Management Plan and Travel Plan [**REP3-013**], submitted at Deadline 3, at paragraph 6.3.2. Diversion routes will be agreed with the local highway authority and co-ordination will be undertaken be avoid cumulative impacts of road closures occurring at the same time.
		3.6	Newmarket Road bends and visibility. Concerns re bends, visibility for site accesses and traffic lights.	The temporary traffic measures, as shown on the Traffic Regulation Measures Plans – Temporary Measures [**REP2-010**, **REP2-011**] are proposed to ensure the safe passage, entry and egress of construction vehicles in and out of the site accesses and for the safe passage of the public. A signage strategy will be implemented to warn motorists of the upcoming temporary traffic signals and construction site access. The temporary traffic measures will be implemented in line with the Traffic Signals Manual chapter 8 and the guidance on the use of portable vehicle signals as published by the Department for Transport. The signage and layout of temporary traffic regulation measures will be agreed with the relevant County Authority in advance of implementation. This has been included in the updated Construction Traffic Management Plan and Travel Plan [**REP3-013**], submitted at Deadline 3, at paragraph 6.4.2.
		3.7, 3.8	Concern re Newmarket Road/The Street junction in Worlington, particularly impacts in terms of HGVs colliding with buildings/street furniture.	The Applicant has agreed with the local highway authority to escort HGVs through the Newmarket Road/Freckenham Road T-Junction within Worlington to safe passage of vehicles and the safety of the public and to avoid damage to the relevant local building. Swept path analysis of the AILs are provided within the Framework Construction Traffic Management Plan and Travel

				Plan [**REP3-013**] and the AIL is not proposed to use the T-Junction within Worlington.
		3.9	War memorial. Risk of damage.	The Applicant has agreed with the local highway authority to escort HGVs through the Newmarket Road/B1102 Freckenham Road T-Junction within Worlington to provide safe passage of vehicles in the interest of the safety and to avoid damage to the local building. Swept path analysis of the AILs are provided within the Framework Construction Traffic Management Plan and Travel Plan [**REP3-013**] and the AIL is not proposed to use the Newmarket Road/B1102 Freckenham Road T-Junction within Worlington. The swept path analysis of the HGV identifies the vehicle can navigate the T-junction. It is noted that the Parish Council references vehicle incidents regarding the war memorial on the B1102 at the B1102 Freckenham Road/Church Lane junction, which is located 500m along B102 Freckenham Road to the west of the Newmarket Road/B1102 Freckenham Road T-Junction. The HGV route continues along the B1102 Freckenham Road past the war memorial and does not turn at the B1102/Church Lane junction. As HGVs will not make turning movements in this location, it is highly unlikely that HGVs would come into contact with the War Memorial which is located within the traffic island at the T-Junction.
REP2-263	Environment – BESS – Fire Safety	8.0	How safe are the batteries (BESS)? What happens in a worst-case scenario?	In recognition of the concerns raised by interested parties the Applicant has updated the outline Battery Fire Safety Management Plan [**REP2-032**] and submitted it for Deadline 2. It is considered this provides a detailed plan which ensures that the final design of the BESS will be acceptable and that in the unlikely event of a fire it would be managed safely ensuring the safety of site staff, first responders and the wider community. As stated in the Plan the BESS system selected for Sunnica will have completed UL 9540A testing which defines and quantifies gas emissions produced during thermal runaway. This data will then be used, if necessary, for specific BESS consequence

				modelling for the Sunnica site. A key priority of this dispersion modelling is to ensure that respondent exposure to any level of emissions from a BESS thermal runaway incident are minimised and the Emergency Response Plan (ERP) provides clear alert protocols and safety guidelines.
REP2-263	Environment – Soils (agriculture)	4 5.0	Bay farm anaerobic digester Agriculture	Bay Farm report no concerns regarding the Sunnica proposal and the Anaerobic Digester (AD) supply with suitable crop material or land for application of digestate. Regardless, Solar PV produces more power per hectare than growing energy crops (Geyer, R et al: Spatially Explicit Life Cycle Assessment of Sun-to-Wheels Transportation Pathways in the US (Environ. Sci. Technol., 2013, 47 (2), pp 1170–1176) so it would not be a coherent measure to constrain solar because of a presumed effect on an AD plant. The current use of the land is not a relevant consideration in terms of policy requirements, and it is the use of Best and Most Versatile Land (BMVL) that should be examined given it is BMVL that falls within planning policy and specifically the Energy NPSs, draft Energy NPSs and the NPPF. MAFF ALC guidelines direct that ALC grades are defined by reference to physical characteristics, grading guidance and cut off limitations. Natural England document TIN049 also notes that current agricultural use or intensity of use does not affect ALC Grade. The site has light textured and shallow soils, with a relatively warm and dry climate. Drought imposes a substantial constraint on the quality and versatility of this agricultural land.
REP2-263	Environment - Noise		Our Village Hall will be affected during the construction phase. The actual hall is single glazed with old style wooden fire doors. It is in close proximity to the road and any passing traffic noise is easily heard inside. The increase in volume of traffic and HGVs will make the hall a less desirable place to hire.	Construction traffic travelling to and from Sunnica East Site A will pass Worlington Village Hall. It is anticipated that, on average, there will be 11 HGV deliveries (22 vehicle movements) per day to Sunnica East Site A during the construction phase. The peak HGV deliveries are forecast to occur in month 14 with 21 HGV deliveries per day (42 movements). Assuming a 10-hour typical construction delivery window, with movements split equally across the hours (excluding the two

				highway peak hours and noting that there will be more arrivals at the start of the day and departures towards the end), it would be anticipated that, on average, there would be approximately two HGV movements in an hour for the Sunnica East Site A and four HGV movements in an hour during the peak month of activity. This level of construction traffic is not considered sufficient to result in a disruption to regular activities in the village hall.

3 Interested parties who had issues related to compulsory purchase that are responded to individually

3.1 Womble Bond Dickinson (UK) LLP on behalf of Drug Development Solutions Limited, LGC Limited and LGC Bioresearch Limited

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
REP2-130	Compulsory Acquisition	1	A summary of the interests of Drug Development Solutions Limited ("DDS") and LGC Limited and LGC Biorsearch Limited (collectively "LGC").	Noted.
REP2-130	Compulsory Acquisition	2	Interests affected by the Application.	The Applicant has been in contact with DDS and LGC regarding its interests. It has been unable to obtain details of the legal interests through the land registry or through its solicitors. As soon as these legal interests are confirmed the Book of Reference will be updated. The Applicant has been in discussions with HPUT A Limited and HPUT B Limited (together "FHPUT") the landlord to DDS and LGC about seeking to agree suitable to terms to enable the Applicant to access to the cable corridor without adversely affecting the LGC Campus. The discussions have seen the Applicant offering the following concessions: • The existing access road being used by cars/light vans and to be restricted to 15 vehicles between 06:00-07:00 and 15 vehicles departing between 19:00-20:00); • Commit to using an alternative HGV access route which will not make use of the existing access road; • Agree to protective provisions (or alternatively a separate side agreement) in order to provide protection to DDS and LGC; • Undertaking a localised vibration assessment which, if required, would provide mitigation measures with the aim of reducing so far as practicable

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				vibrations during the construction process which could disturb the DDS and LGC site These measures would be secured in protective provisions or, in the alternative, a side agreement. The Applicant was not directly including DDS and LGC in these discussions, as the agents for the Applicant understood that HPUT was involving DDS and LGC as part of these negotiations. If that is not the case, the Applicant is happy to involve DDS and LGC. On receipt of the Written Representation from these parties the Applicant has now contacted them again. It is considered that that the concessions referred to above would address the concerns they have. The Applicant does seek temporary powers over all of the land within the Order limits to enable construction to take place. However, as part of the discussions referred to above, it is willing to limit this use in terms of the plots in which DDS and LGC has an interest. This would be secured either in protective provisions or in a side agreement recording the above terms.
REP2-130	Compulsory Acquisition	3.1	No clear purpose or justification for acquisition	The purpose of the rights sought over plots 16-05 and 16-06 is clearly to enable access to the cable corridor to enable the Applicant to construct the cable in this location. There is no requirement for it to use this access to access Sunnica West when it has acquired the ability to access that land by private treaty with the landowner. The Applicant would be willing to include this stipulation in the protective provisions (or any private agreement) reached with DDS and LGC. Access at plots 16-05 and 16-06 is to facilitate construction of the cable corridor in that location only.
REP2-130	Compulsory Acquisition	3.2 and 3.5	Access via 16-10, 16-09 and 16-08	In correspondence with HPUT (the landlord of Drug Development Solutions Limited, LGC Limited and LGC Bioresearch Limited), the Applicant has offered to route HGVs via plots 16-12, 16-09, 16-08 and 16-04, as shown on the Land Plans [REP2-004]. As referred to above, the existing access road will only be used by cars/light vans and restricted to 15 vehicles between 06:00-07:00 and 15 vehicles departing between 19:00-20:00). It is not anticipated that this level of LGV traffic would impact on operations at the campus.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
REP2-130	Compulsory Acquisition	3.3	Consultation process	The Applicant submits that a letter notifying of changes to the red line that brought in the access road to the Campus was sent out on 12 February 2021. The Consultation Report shows the plan that accompanied that letter which does show an amended red line that includes that land. However it is accepted that the plan does not include an annotation that draws attention to that change. As the amended red line clearly shows the access road, it is considered that no prejudice has been caused. HPUT have plainly be aware of this change for a considerable period of time and DDS and LGC were clearly notified on acquisition of their relevant interests.
REP2-130	Compulsory Acquisition	3.7	Negotiations	Please see response to paragraph 2 above.
REP2-130	Compulsory Acquisition	3.8 – 3.14	Noise	Consultation is being undertaken with FHPUT to determine whether any requirements are necessary to protect vibration sensitive equipment so continual operation is not affected by vibration generated by the Scheme. This is being done based on the commitments given by the Applicant above, being: • the existing access road being used by cars/light vans only and to be restricted to 15 vehicles between 06:00-07:00 and 15 vehicles departing between 19:00-20:00); • using an alternative HGV access route which will not make use of the existing access road.
REP2-130	Compulsory Acquisition	3.15	Funding statement	The Applicant does not consider there is any possibility that its works would prevent DDS and LGC from fulfilling its contractual obligations due to the suggested methodology of construction which is referred to in response to paragraph 2 above.
REP2-130	Compulsory Acquisition	3.16 – 3.19	Impacts on car parking and waste facilities	The Applicant does not intend to make any use of the access and existing car park other than for light vehicles to pass and re-pass over it. The proposed construction compound would be located outside of the access and car park. This has been discussed as part of the negotiations with FHPUT and would be secured through the protective provisions or the property documentation. Therefore, there would be no loss of car parking spaces or space for the waste skips and compactor collections.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				The Applicant does seek temporary powers over all of the land within the Order limits to enable construction to take place. However, it is willing to limit this use in terms of the plots in which DDS and LGC has an interest. This would be secured in protective provisions or side agreement recording the above terms.
REP2-130	Compulsory Acquisition	3.20 – 3.21	Impacts of the proposed use of the Access Road	As explained in our response to paragraph 2 above, the access road would only be used by cars/light vans up to a maximum of 15 vehicles arriving in the morning (between 06:00-07:00) and 15 vehicles leaving at the end of the day (between 19:00-20:00). The Applicant considers that this would enable the continued use of the access road by DDS and LGC without an impact on the operation of its facilities.
REP2-130	Compulsory Acquisition	3.22 – 3.23	Site security and Health and Safety risk	The Applicant is willing to agree to a site access verification procedure whereby the identification of drivers will be verified in advance to ensure that access can be granted without issue. As explained in our response to paragraph 2, the access road would not be used by any HGVs and the hours of use would be limited to times when the Campus is not in full use. As such the Applicant does not consider there would be any issues with site security or conflict of pedestrians using the access road.
REP2-130	Compulsory Acquisition	3.24-3.25	Utilities	The Applicant has proposed for the cable to be sited to the west of the raised-earth bund bank. Furthermore, the current proposal is to horizontal directional drill (HDD) to and from Sunnica West Site B. The specification of which would be at such a depth that there would be no adverse impacts to the raised-earth bund bank. In respect of utilities the Applicant does not believe that the cable with interact with any facilities in this location. There is an existing Anglian Water pipe but that will not be affected. In the circumstances that utilities are identified then the relevant protective provisions in the Order would apply.
REP2-130	Compulsory Acquisition	3.25	Impacts on flood defence bank	There are no proposals in the DCO to remove the flood defence bank; any works will provide a 10m buffer to watercourses. It is also proposed to use HDD techniques to cross Man Rivers or large watercourse with the Cable Routes; therefore, no impact is envisaged to occur to the flood defence bank.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
REP2-130	Compulsory Acquisition	3.26	Impacts on residential properties	It is not anticipated that the Scheme will result in significant adverse effects on the LGC Campus and the two residential properties. The Environmental Impact Assessment has assessed the potential effects of the Scheme and these are presented in the Environmental Statement **[APP-038 to APP-048]**. Key aspects of the assessment relevant to the Campus area are outlined below: • Landscape and Visual Assessment: The assessment concludes that there will be a temporary minor adverse effect during construction and a neutral effect during operation (Year 1 and 15) and decommissioning; • Noise: Although the receptors are not explicitly identified in the ES, noise impacts can be considered equivalent to those identified for R3 identified on Figure on Figure 11-1 to 11-4 **[APP-233 to APP-236]**. Noise levels that were predicted during the construction phase (worst case of 56 dB $L_{Aeq,T}$) and operational phase (worst case of 23 dB $L_{Aeq,1h}$) are substantially below criteria defining adverse noise levels. The assessment concludes that there will be a negligible to minor adverse effect during construction and decommissioning and a negligible adverse effect during operation; • Air quality: A Dust Risk Assessment has been undertaken which concludes that there is a low to medium risk for amenity and human health receptors as a result of the Scheme during construction and decommissioning. There are no anticipated effects during operation. • Traffic and Access: The assessment has concluded that in the development peak hour (06:00 to 07:00) and (19:00 to 20:00), there would be a minor adverse effect on traffic utilising the A142 in terms of driver delay. There are no anticipated effects during operation. As a consequence of the above the Applicant denies that there would be a contravention of Article 8 of the Human Rights Act 1998.
REP2-130	Compulsory Acquisition	3.28-29	Expansion proposals	The Applicant notes that Planning Permission 17/01838/ESF was granted by East Cambridge District Council on 5 March 2019 and would have expired on 5 March 2022 if it was not implemented by that date. WR-034 refers to works under the planning permission beginning in November 2022 or in 2023. Noting this and that no records of planning conditions being discharged or reserved matters approved

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				appear to be available, the Applicant notes that this planning permission appears to have expired. The internal works to Building B which are stated to take place from November 2022 until March 2023 would not coincide with construction of the Scheme. If, as appears to be the case, Planning Permission 17/01838/ESE has expired, it does not appear to the Applicant that there is any planning permission for the site that would permit the construction of any new building at the campus. The Applicant would be grateful to receive clarification as to the basis on which there is an extant planning permission of the construction of Building B West or Building D East. Notwithstanding the above, Section 2.6 and Table 2-1 of Planning Statement Part 1 [APP-261] identify the interaction between the Scheme and planning permission 17/01838/ESF. 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. This land 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.

3.2 Bryan Cave Leighton Paisner LLP on behalf of HPUT A Limited and HPUT B Limited

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
REP2-144	Objection	1	HPUT A and HPUT B Limited as trustees of the FHPUT Property Unit Trust ("FHPUT") objects to the Scheme	The Applicant has been in active discussions with FHPUT and its appointed agents since pre-application and it has been seeking to address the concerns that have been raised. The Applicant is aware of the nature of the operation that is run at the Campus and has been seeking to agree a set of measures relating to the proposed construction of the Grid Connection Route to minimise the impact this will have on the Campus. The aim of these measures, which would be secured through protective provisions (or in the alternative in a side agreement), are to address the points raised by FHPUT. The Land Plots in which FHPUT has an interest are 16-03, 16-04, 16-05, 16-06 and 16-07. Access rights are sought in 16-06 Cable rights are sought in 16-03, 16-04 and 16-07 Cable and Access rights are sought in 16-05 The extent of these rights are set out in Schedule 8 of the draft Development Consent Order. The Applicant is keen to reach agreement by private treaty in respect of these rights.
REP2-144	Land	6.2	FHPUT comment that part of its campus is marked as being subject to Work No. 6D, which is outside of the red line	The Works Plans submitted on 11 November 2022 (revision 3) [REP2-005] does not shown this annotation.
REP2-144	Land	6.1, 6.3, 6.4, 6.5,	FHPUT comment that Sunnica is seeking wide-ranging powers under Works 4 and 9	The Work Packages, as is common practice, have been packaged together in a logical order. It would be unmanageable to have individual work packages for individual plots of land. What works Sunnica can actually carry out on FHPUT's land is governed by what property rights it is granted, either voluntarily or through compulsory acquisition. For example, the Applicant will not have the right to construct lay down areas, material storage areas or welfare and workshops on FHPUT's land. Whilst the Applicant does not see any need for this to be written

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				into the DCO/any side agreement given the clarity in Schedule 8 (rights sought), should FHPUT require that comfort then confirmation as to what the Applicant can and cannot do on the plots can be provided in the protective provisions for FHPUT's benefit (or in the alternative a side agreement) or even written on the Works Plans. The Applicant is discussing the most appropriate route with FHPUT. In terms of plot 16-06, the Applicant is only seeking "Access rights" along this plot. The definition of "Access rights" applies across the whole Order Land. The Applicant is, however, content to narrow down this definition in respect of FHPUT's plots so that it only covers access for cars and/or light vans between 06:00-07:00 and 19:00-20:00.This can be secured in the protective provisions (or in the alternative a side agreement) or a new definition can be inserted into the draft DCO. In terms of plots 16-03, 16-04 and 16-07, the Applicant is only seeking "Cable rights" to install the cable. An appropriate restriction is also required along the cable route to protect the cable. These rights do not impact the Campus, given the cable corridor is under the car park, which is not incompatible with the installation of services. The Applicant is content to discuss any narrowing down of the "Cable rights" definition where there is a particular concern. In terms of plot 16-05, both "Access rights" and "Cable rights" are applied for, and the above points apply.
REP2-144	Land	6.6, 6.7 and 6.8	FHPUT comment that the Book of Reference omits that the Campus is also affected by the extinguishment of rights in parcels 16-08 and 16-09	Article 21(1), extinguishment, is subject to the rest of the Article. Article 21(2) governs how the extinguishment of rights applies to land that is subject to the compulsory acquisition of rights only. Under Article 21(2), private rights over land that is subject to the compulsory acquisition of rights only cease to have effect in so far as their continuance would be inconsistent with the exercise of the right. We do not consider that the "Access rights" and the "Cable rights" would be inconsistent with the right to drain surface water and to enter the land to clear and clean the drain; the right to erect, maintain and repair fences etc; the right to repair fences and the right of way. We therefore do not consider that the rights referenced would cease to have effect. If required, the Applicant would be willing to confirm in protective provisions (or in the alternative a side agreement) that the rights referenced would not be subject to this Article.

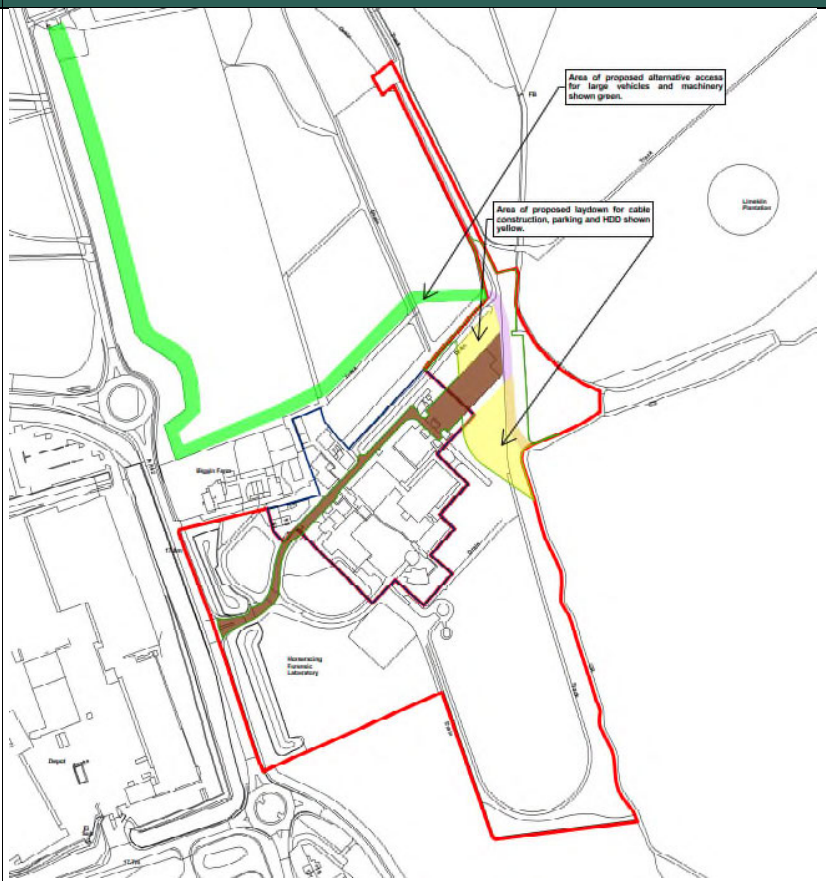
Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
REP2-144	Land	6.9	Article 27 allows the Applicant to enter on and take temporary possession in order to remove any buildings etc on the land and construct temporary works, structures and buildings.	As is common practice, temporary possession enables developers to minimise the permanent acquisition of the rights sought. This is particularly the case for the cable corridor, where temporary possession will enable the Applicant to carry out micro siting before acquiring the permanent easement. In respect of the FHPUT's plots, the Applicant can confirm that it will not need to take temporary possession of the access road as it will be solely used for cars/light vans to access the site.[]In respect of the other plots the Applicant is content to limit this power so it relates to the removal of fencing/boundary features only and then reinstatement. Again this can be secured in protective provisions (or in the alternative a side agreement).
REP2-144	Land	7.4- 7.5	FHPUTs refer to the Applicant's attempts to access the Campus for the purposes of survey work.	The Applicant did require access to the Campus for survey work which is entirely normal for a project such as the Scheme. The use of powers pursuant to the Housing and Planning Act 2016 are entirely lawful and are used by promoters of NSIPs on a regular basis. It is also noted that the exercise of these powers did not cause any disturbance to the Campus.
REP2-144	Consultation	7.7	No service of s.42 notice	The Applicant issued Section 42 notices to HPUT A Limited and HPUT B Limited on 16 September 2020 and 12 February 2021. The notices were issued to FHPUT's Companies House registered address and were addressed to the Secretary.
REP2-144	Land	7.6, 7.8	FHPUT characterise negotiations to date.	The Applicant does not recognise the characterisation of the negotiations undertaken to date to reach agreement. The Applicant has been maintaining a Schedule of Negotiations and Powers Sought. The most recent iteration of this schedule was submitted at Deadline 2 [REP2-020]. This document sets out the considerable efforts that the Applicant has gone to reach agreement with FHPUT and continues to do so. The Applicant highlights the following commitments that it will secure to address the concerns that FHPUT have in respect of the Scheme: • The existing access road being used by cars/light vans and to be restricted to 15 vehicles between 06:00-07:00 and 15 vehicles departing between 19:00-20:00);

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				• Commit to using an alternative HGV access route which will not make use of the existing access road; • Agree to protective provisions (or alternatively a separate side agreement) in order to provide protection to FHPUT; • Undertaking a localised vibration assessment which, if required, would provide mitigation measures with the aim of reducing so far as practicable vibrations during the construction process which could disturb ~~for~~ the Campus. The Applicant considers that the above demonstrates that it has already been carrying out meaningful engagement with FHPUT and it will continue to do so in an effort to reach voluntary agreement with FHPUT and its tenants.
REP2-144	Alternatives	8	FHPUT sets out that it does not consider Sunnica has demonstrated that there is a compelling case in the public interest that it should be granted powers of compulsory acquisition because it has failed to consider alternatives and because it has not properly assessed the impact of the Scheme on the Campus	ES Chapter 4, Alternatives and Design Evolution [**APP-036**] explains alternatives considered. This includes alternative sites at Section 4.5, alternative technologies at Section 4.6, alternative layouts at Section 4.7, and alternative cable route corridors at Section 4.8. ES Appendix 4A, Alternative Sites Assessment [**APP-054**] provides additional detail to explain the reasons for the Applicant's decision and options considered. Section 4.8 of ES Chapter 4, Alternatives and Design Evolution [**APP-036**] provides an overview of the evolution of grid connection routing options through the design development and consultation process, starting at pre-scoping and progressing through, EIA scoping, non-statutory consultation and statutory consultation. This identifies that the 'cable route option 1' shown in Figure 4-3 [**APP-173**] (and highlighted in WR-016) was a pre-scoping stage option. This is a very early stage in the scheme and predates March 2019. Subsequent routing options presented at EIA Scoping stage in March 2019 (Figure 4-1 [**APP-171**]), non-statutory consultation stage in June/July 2019 (Figure 4-2 [**APP-172**]) and at statutory consultation/PEIR stage in August 2020 (Figure 4-6 [**APP-176**]) all show the most northerly of the two route options (referred to as 'Railway Crossing Option 1') running to the north of the FHPUT buildings, as is now proposed by the application. The information provided in Section 4.8 presents an overview of some of the reasons that the southerly grid connection route option was not progressed.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				In addition, prior to EIA scoping stage in March 2019 'cable route option 1' shown on Figure 4-3 [**APP-173**] was amended to run to the north, rather than the south, of the FHPUT buildings, as shown on Figure 4-1 [**APP-173**]. The main reasons for this decision are outlined below. • Snailwell Roman Villa, a Scheduled Monument, (NHLE 1006868) is located approximately 120m south of the FHPUT land. The installation of a grid connection cable to the south of the FHPUT land, as per 'cable route option 1' shown on Figure 4-3 [**APP-173**], therefore has the potential to impact the setting of the scheduled monument and to impact archaeology that may be associated. By routing the cable to the north of the FHPUT buildings the Scheme gives the scheduled Roman Villa and potential associated archaeology a much wider birth. • 'Cable route option 1' shown on Figure 4-3 [**APP-173**] would require increased vegetation removal as it would have run parallel to the edge of Newmarket Road. • 'Cable route option 1' shown on Figure 4-3 [**APP-173**] would bisect employment allocation FRD6, of the East Cambridgeshire Local Plan, as identified by Figure 2-11 of the Planning Statement [**APP-263**]. This allocates the FHPUT land for employment development (B1/B2 uses). The grid connection route as proposed by the Scheme would skirt the northern edge of this allocation, resulting in the creation of less constraint on this allocation in comparison. • The FHPUT land previously benefited from Planning Permission 17/01838/ESF, granted by East Cambridge District Council on 5 March 2019. Since no records of planning conditions being discharged or reserved matters approved are available, the Applicant understands that this planning permission has now expired. However, at the time that routing options for the grid connection were being considered, this planning permission could have been implemented. As shown by Parameter Plan 3 TP012 (which is an approved plan listed on the decision notice), the previously consented scheme includes outline planning permission for buildings labelled 'Mid Tech 1' and 'Mid Tech 2' located across much of the land to the south of the existing FHPUT buildings. This means that 'cable

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				route option 1' shown on Figure 4-3 [**APP-173**] would have had to cross beneath two or three of the approved new FHPUT buildings, had the FHPUT development approved by planning permission 17/01838/ESF been constructed. Instead, the cable routing proposed by the Applicant avoids land where FHPUT had gained planning approval for the construction of buildings and instead would affect land that would only have been used for car parking, thereby minimising the impact on the FHPUT facility. Further, although planning permission 17/01838/ESF is understood to have expired, it is noted that the proposed cable route through the FHPUT land to the north of the FHPUT buildings would not present an impediment to the expansion of the FHPUT facility along the lines of the expired planning permission, whereas if 'cable route option 1' shown on Figure 4-3 [**APP-173**] had been pursued, any future development in the southern part of FHPUT's land would have had to take appropriate measures to avoid the Sunnica grid connection cable. Overall, the potential impact of 'cable route option 1' shown by Figure 4-3 [**APP-173**] on the scheduled Roman Villa and associated archaeology and on FHPUT's future development aspirations (that benefited from planning permission at the time that routing decisions were being considered) are considered to outweigh the impact of routing the cable through unused land within the northern section of the FHPUT site, as is proposed by the DCO application. Regarding the suggestion in WR-016 that 'cable route option 1' could have been pushed further south to completely avoid FHPUT's land, this would have meant the grid connection route would have been in extremely close proximity to the scheduled Roman Villa, noting the need for a approximate 30 m to 100 m wide working corridor, as set out by paragraph 3.5.5 of ES Chapter 3 [**REP2-022**]. This would increase the potential for impacts on the setting of the scheduled Roman Villa and for impacts on archaeology associated with it. In addition, such a route would cross employment allocation FRD5, as identified by Figure 2-11 of the Planning Statement [**APP-263**]. This is allocated by policy FRD 5 of the East Cambridgeshire Local Plan for 5.5 hectares of employment use (B1/B2/B8). A cable route crossing this land from east to west as suggested by WR-016 could severely constrain the delivery of employment development in this location.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				Regarding Figure 12 of WR-016, the Applicant notes that in correspondence with FHPUT, the Applicant has suggested using routing similar to that shown in yellow for HGV deliveries. The Applicant considers the alleged deficiencies in the environmental impact assessment below.
REP2-144	Environment - Transport	9	FHPUT outline inadequacies that it believes exist in respect of the transport assessment undertaken by the Applicant.	The Applicant considers that the access locations chosen to provide access to Grid Connection Route B provide safe and secure access and egress. However, the Applicant is involved in discussions with FHPUT's traffic consultant regarding access through the FHPUT site. To reduce the potential impact on FHPUT, Sunnica has proposed that the cable corridor HGV construction traffic will use alternative routes to access the rear of the HPUT site. The alternative access for HGVs is shown on the plan below.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				 This option is subject to constraints which is the reason that the FHPUT access was originally identified for the Application, but the Applicant has proposed this solution to facilitate an agreement with FHPUT. This access will be utilised by HGV and construction vehicles which would mean that no HGV traffic would use the access road off the A142.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				Access for cars/light vans would still be via the A142 entrance arriving in the morning (between 06:00-07:00) leaving at the end of the day (between 19:00-20:00).
REP2-144	Environment - Noise	10	FHPUT outline inadequacies that it believes exist in respect of the noise and vibration assessment undertaken by the Applicant.	Consultation is being undertaken with FHPUT to determine whether any requirements are necessary to protect vibration sensitive equipment so continual operation is not affected by vibration generated by HGV movements or construction activities during the proposed construction programme. This is being done based on the commitments given by the Applicant, being HGV movements not using the access road as outlined above with the existing access road only being used by cars/light vans (and to be restricted to 15 vehicles) between 06:00-07:00 and 15 vehicles departing between 19:00-20:00).
REP2-144	Environment/Planning Design	11 and 12	FHPUT sets out the implications for the Campus.	The Applicant's responses to sections 8, 9 and 10 of FHPUT Written Representation indicates that it does not accept the deficiencies identified in the work undertaken on traffic and transport and noise and vibration. It considers that the Scheme can be constructed, operated and decommissioned without an unacceptable impact on the Campus and this is now strengthened through the commitments given by the Applicant above. The method of securing these commitments identified to FHPUT would be via protective provisions or in the alternative a side agreement. The Applicant has proposed considerable mitigation and concessions to address the points raised by FHPUT. This appears to be accepted by FHPUT in section 12 of its Written Representation, although it stops short of saying that the proposals are acceptable as it continues to assess them. The Applicant is committed to reaching agreement with FHPUT and will continue to seek to enter into meaningful negotiations so that the conclusion of an option for an easement can be achieved by the close of examination.

3.3 Bidwells on behalf of the Mitcham family

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
REP2-094			The scope of compulsory acquisition powers being sought.	**Summary of interests** The Mitcham family have the following interests in land as set out in more detail in the Book of Reference [**REP3-003**]: 1. freehold owner, reputed freehold owner and/or occupier of a total of: (a) 5,988m^2 of public road, roundabout, verges, footway and access splays at Newmarket Road (plot numbers 16-11 and 16-13); (b) 35,095m^2 of field, agricultural land and overhead electricity lines at Fordham House (plot number 16-14); (c) 40,471m^2 of field, agricultural land, private access track, overhead electricity lines, woodland, outbuilding and drain at Breach Farm (plot numbers 17-03 and 18-01); (d) 1,947m^2 of public road, verges and overhead electricity and telecommunication lines at Ness Road (plot number 18-02); (e) 38,687m^2 of field, agricultural land, public road, verges, overhead electricity and telecommunication lines, drain and hedgerow at Broads Road (plot numbers 18-09, 18-10, 18-11 and 19-04); (f) 1,115m^2 of catch water drain, field, agricultural land, public footpath, drain and overhead electricity lines west of First Drove (plot numbers 18-16, 18-17, 18-18 and 19-02); and (g) 14,333m^2 of field, agricultural land, access tracks and overhead electricity lines at Goosehall Farm (plot number 19-03).

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				2. potential claims under section 10 of the Compulsory Purchase Act 1965, Part 1 of the Land Compensation Act 1973 or section 152(3) of the Planning Act 2008 over 271m^2 of private road, verges, public footpaths (35/10 and 35/11), drain and overhead electricity and telecommunication lines (First Drove) (plot number 18-16); and 3. entitled to enjoy easements or other private rights (including private rights of navigation over water) over 271m^2 of private road, verges, public footpaths (35/10 and 35/11), drain and overhead electricity and telecommunication lines (First Drove) (plot number 18-16); which it is proposed to extinguish, suspend or interfere with. The above land is required for parts of Work Nos. 4 and 9, being the laying down, maintenance and replacement and use of electrical cables and the construction, improvement and replacement and use of new accesses to the authorised development or the use of existing accesses to access the authorised development, respectively. See the Schedule of Negotiations and Powers Sought [**REP3-007**] for more detail. **Why land is required** As set out in the Statement of Reasons [**REP2-018**], to ensure that the Scheme can be built, maintained and operated, and so that the Government's policies are met in relation to the timely provision of new generating capacity and meeting net zero carbon emissions targets for 2050, the Applicant requires the acquisition of property interests in third party ownership in respect of Grid Connection Route B. The Applicant has therefore applied for the grant of powers to facilitate acquisition and/or

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				creation of new rights and interests, and to extinguish rights, over the required land. In respect of the land owned and/or occupied by the Mitcham family, the Applicant is seeking to compulsorily acquire new rights in the land to enable construction of the cable corridor and an easement for the underground cable itself, once installed. The Applicant will use the rights to enable construction of the cable route for Grid Connection Route B. The Framework Construction Environmental Management Plan (FCEMP) [**REP3-015**] sets out the activities required for the construction of the cable route, which include site preparation and appropriate searches, excavation of the trench, segregation and storage of topsoil (to be reused), clearing and bottoming out of the trench, installation of sand bedding, and installation of cable (which will follow behind excavation in the same sequence). The cable trenches will be backfilled (using soil extracted during construction) and reinstated following construction. Agricultural soils excavated during this process will be managed, preserved, retained, and reinstated in accordance with Defra guidance. As possession of the land is required for construction only, it will be temporary in nature (noting that the cable itself will remain in situ at a depth of 2m below ground level). The Scheme Description [**REP2-022**] provides detail on the construction programme for the cable route corridor, which will be undertaken in two concurrent phases over a 30-week period. **Negotiations with the affected landowner** The Applicant has been in various correspondence involving many different land interests of the Mitcham family, including: • Michael Robert Mitcham since 2019; • Mitchams Contracts (Burwell) Limited since March 2019;

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				• Lonsdale Pension Trustees Limited (Mr M R Mitcham and Ms T A Mitcham are co-proprietors) since July 2020; • Teresa Anne Mitcham since July 2020; and • Matthew James Mitcham since February 2021. Negotiations on an option agreement are ongoing. For further details see the Schedule of Negotiations and Powers Sought [**REP3-007**].
REP2-094	Land	3.0	Representation 1 – Scheme Design. Lack of detail concerning the installation and delivery of the grid connection. The design principles for the grid connection only provides for maximum details in width and depth. It is imperative that all cables are buried well below a minimum of 1.2m depth. It is important that the landowner can have input into the design of the scheme. The construction programme is uncertain. Concern about impact of 2 years of disrupted activities to the farming operations. Further detail requested on cable laying, its programming, and the likely timeline for the landowners.	The Applicant has responded to some of the points raised in its Response to Relevant Representations [**REP1-016**], see: - Response to RR-1261, 1262, 1263, 1275, page 348, with respect to the Applicant engaging proactively with landowners regarding the design of the cable route. - Response to RR-1262, 1263, 1275, page 393, with respect to cable installation not disrupting farming activities where the cable crosses arable fields. - Response to RR-1170, page 393, with respect to further detail of cabling around Breach Cottage. - Response to RR-1262, 1263, 1275, page 393, with respect to the statement that cables should be laid to a depth of 1200mm. The Framework CEMP [**REP3-015**] includes measures to manage disruption to local residents and businesses during construction. On pages 16C-43 – 44, the Framework CEMP provides the following with respect to construction programme: "*The principal contractor will undertake specific liaison with landowners to provide them with a programme of when land is proposed to be possessed for the purposes of the Scheme*

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				(including if land is to be possessed more than once) prior to the temporary possession notice period in the DCO." The Framework CEMP [**REP3-015**] and OEMP [**REP2-030**] also includes measures with respect to the management of soils during construction and operation, in order to mitigate potential impacts from activities associated with the Scheme. These are included at Table 3-7 of the Framework CEMP and Table 3-6 of the Framework OEMP.
REP2-094	Land	4.0	Representation 2 – Area of rights acquired Width of area that rights are sought over is wider than required (and wider than shown in the option plan). There is no differentiation between land needed for temporary access and the easement. Impact from cable route on future land use.	The Applicant has responded to some of the points raised in its Response to Relevant Representations [**REP1-016**], see: - Response to RR1170, page 618, with respect to land over which rights are sought being too large, which has led (on another scheme) to rights being granted over a large area of land which wasn't ever required. - Response to RR-1261, 1262, 1263, 1275, page 348, with respect to the Applicant engaging proactively with landowners regarding the design of the cable route. - Response to RR-1262, 1263, 1275, page 393, with respect to cable installation not disrupting farming activities where the cable crosses arable fields. In terms of the area over which rights are sought, and the suggestion that this is wider than required, the Applicant's response (in its Response to Relevant Representations [**REP1-016**]) to RR1170, page 617-618, explains how, with respect to the cable corridor, temporary possession is sought in order to carry out detailed surveys and instal cables, meaning new rights would be acquired only in respect of the relevant strip within the overall corridor in which the permanent easement would be located. In this way, the permanent easement would not be taken over more land than is reasonably necessary.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				As noted on the option plan included in the written representation, that cable route easement corridor shown is indicative, and this could move within the scheme boundary (shown green on that plan) following detailed surveys, as explained above. There is no inconsistency between the option plan and the powers sought on the land plans. In respect of future land uses, the Applicant is not aware of any proposed new land uses beyond the existing use of the land agricultural purposes. The proposed routing of the grid connection would not prevent this use from subsisting except for the temporary construction period.
REP2-094	Land	5.0	Representation 3 – Method of acquisition The landowners' preference would be for acquisition via notice to treat, if the scheme must go ahead at all to allow key items for negotiation to be agreed before entry and only rights absolutely necessary for the scheme are acquired – given experience from another scheme where GVD powers were utilised over wide areas and for longer than needed (or over land not ultimately needed).	The Applicant's response (in its Response to Relevant Representations [**REP1-016**]) to RR1170, page 617-618, explains how, with respect to the cable corridor, temporary possession is sought in order to carry out detailed surveys and instal cables, meaning new rights would be acquired only in respect of the relevant strip within the overall corridor in which the permanent easement would be located. In this way, the permanent easement would not be taken over more land than is reasonably necessary. The Applicant's response to ExA's First Written Question 1.5.37 [**REP2-037**] explains how temporary possession would first be taken, with the service of notice to treat or the making of a general vesting declaration to follow. The response to question 1.3.15 also explains how the hierarchy of temporary possession and compulsory acquisition of rights and land would operate, to enable the Applicant during the detailed design process to 'refine down' the powers it requires to deliver the Scheme in the light of the detailed design. The response to question 1.3.18 [**REP2-037**] is also relevant in terms of taking temporary possession during construction and the incentives for the Applicant to remain in temporary

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				possession for as little time as possible and to minimise impacts and construction costs. The response to question 1.5.15 [**REP2-037**] explains how the use of temporary possession minimises the interference with land, allowing a more proportionate exercise of powers of acquisition of land or rights. Whether a notice of entry will be served or a general vesting declaration made will depend on which legislative route Sunnica uses to actually implement its compulsory acquisition powers and the circumstances that prevailed at the time, should it be necessary to exercise powers of compulsory acquisition. The Applicant requires the option to acquire the land via the vesting process set out in the 1981 Act rather than the notice to treat procedure. Vesting declarations allow title in the land concerned to pass to the acquiring authority more quickly than using the notice to treat method. They also enable several parcels of land to be acquired under the same legal instrument and therefore more efficiently than under the notice to treat procedure.
REP2-094	Environment - Water	6.0	Representation 4 – Drainage. The cable route will cut across large areas of land drains. The Drainage Technical Note states there is currently no formal piped drainage system within the Order Limits. The representation states that there are significant numerous agricultural drainage ditches across the Mitcham family landholdings.	The Drainage Technical Note **[AS-010]** identifies the drainage strategy for the PV Sites. The crossing of drainage ditches and water courses along the cable corridor is assessed in Chapter 9: Flood Risk, Drainage and Water Resources **[APP-041],** with embedded mitigation described in paragraphs 9.7.23 to 9.7.28 and secured through the Framework CEMP **[REP3-015**]. Mitigation measures include: - Pre-works hydromorphological survey must be undertaken to record channel features and provide the baseline against which reinstatement will be provided. - Reinstatement will aim to provide an improved channel form with enhancement works to be carried out (where relevant and appropriate to do so) between 5 and 10m upstream and downstream of the open trench.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				- Where possible intrusive watercourse crossings will be carried out during drier periods of the year or during a period of dry weather where flows in the watercourse are low. - Bank and bed sediments must be stored separately and in distinct layers as excavated on geotextile layers so they can be reinstated as found following completion of the works. - The banks and the bed will need to be appropriately reprofiled with the inclusion of suitable geomorphic features with the aim to provide betterment on the original channel. - Banks will be replanted with suitable riparian species.
REP2-094	Land	7.0	Representation 5 – ongoing and historic negotiations It is inaccurate to state there has been any meaningful interaction or negotiation.	The Applicant has been in correspondence with its landowner or agents since July 2021. The Applicant does not agree that the Application infers that the Mitcham family have stalled negotiations. Negotiations paused between June and September 2022 whilst time was taken to discuss commercial development plans and a borehole survey at Fordham House. The Applicant is continuing to work towards reaching agreement by negotiation rather than relying on compulsory acquisition powers and discussions are ongoing regarding heads of terms for options for easement. The timescales for an all-parties meeting are now being considered and comments on the Heads of Terms are to be address further by the Applicant. The Applicant remains committed to obtaining the relevant rights by voluntary agreement.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
REP2-094	Land	8.0	Conclusion – The landowners' agent believes the decision in Vicarage Field Barking CPO is pertinent to the Sunnica DCO application.	The CPO decision cited by the landowner related to a decision not to make a CPO for a regeneration scheme due to doubts (due to lack of evidence / updated viability assessment) as to the viability of the proposed scheme and consequently the likelihood of it being delivered. The viability and delivery of the Applicant's Scheme are not in doubt and the Applicant disagrees that the CPO decision referred to has relevance in this case. The Applicant considers it has responded to matters which have been raised by the Mitcham's or their agents and it is not clear what additional information is being sought beyond that already provided.

4 Interested parties who had issues related to compulsory purchase that are responded to thematically

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
REP2-097, REP2-184	Compulsory Acquisition	Q	**REP2-097** Engagement between the Applicant and the landowner in relation to the rights of access required to the interested party's land, including the negotiation of heads of terms in relation to the permanent easement for the underground cable. **REP2-184** Distress caused by interference with the farm at Badlingham.	**Owner/occupier of land** A. G. Wright & Son (Farms) Ltd is a freehold owner, reputed freehold owner and/or occupier of 416m^2 of river, bed and banks at River Kennett and a total of 123,371m^2 of field, woodland, agricultural land, access tracks and public footpath at Badlingham Farm, as set out in more detail in the Book of Reference [**APP-024**]. This land is required for part of Work No 4, being the laying down, maintenance and replacement and use of electrical cables. Lucinda Wright [**REP2-184**] is not listed in the Book of Reference [**APP-024**]. However, the Applicant has included the relevant written representation within this response because it understands that the point raised around the "energy cable running through our fields" relates to A. G. Wright & Son (Farms) Limited's interest in the land at Badlingham Farm – see paragraph above. **Why land is required** As set out in the Statement of Reasons [**APP-022**], to ensure that the Scheme can be built, maintained and operated, and so that the Government's policies are met in relation to the timely provision of new generating capacity and meeting net zero carbon emissions targets for 2050, the Applicant requires the acquisition of property interests in third party ownership in respect of Grid Connection Route A. The Applicant is therefore seeking compulsory acquisition powers to facilitate acquisition and/or creation of new rights and interests, and to extinguish rights, over the required land. In respect of the land owned and/or occupied by A. G. Wright & Son (Farms) Ltd, the Applicant is seeking to compulsorily acquire new rights and restrictive covenants over the land to enable construction of the cable corridor and an easement for the underground cable itself and its protection, once installed. The Applicant will use the powers sought to enable construction of the cable route for Grid Connection Route A. The Framework Construction Environmental Management Plan (FCEMP) [**REP3-015**] sets out the activities

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				required for the construction of the cable route, which include site preparation and appropriate searches, excavation of the trench, segregation and storage of topsoil (to be reused), clearing and bottoming out of the trench, installation of sand bedding, and installation of cable (which will follow behind excavation in the same sequence). The cable trenches will be backfilled (using soil extracted during construction) and reinstated following construction. Agricultural soils excavated during this process will be managed, preserved, retained, and reinstated in accordance with Defra guidance. As possession of the land is required for construction only (although powers are also required in relation to maintenance), it will be temporary in nature (noting that the cable itself will remain in situ at a depth of 2m below ground level). The Scheme Description [**REP2-022**] provides detail on the construction programme for the cable route corridor, which will be undertaken in two concurrent phases over a 30-week period. **Negotiations with affected landowner** The Applicant has been in correspondence with the landowner, their agent and solicitor since March 2019. The Applicant issued initial Head of Terms to the landowner on 29 June 2021 with a view to reach a voluntary agreement for the acquisition of the required rights, then the Applicant's agents issued revised Heads of Terms on 6 December 2021. Despite regular attempts to negotiate with the interested parties' land agent and solicitor, to date the landowner has not entered into negotiations with the Applicant. The Applicant looks forward to continued negotiations with the affected person and would welcome discussion on the terms included in the Heads of Terms, including those in relation to objections to the application. For further details see the Schedule of Negotiations and Powers Sought [**REP3-007**].
REP2-133	Compulsory Acquisition		The ability to compulsorily access and the extent of land covered by the heads of terms provided for the easement in relation to the required access to the interest party's land.	**Owner/occupier of land** Elizabeth Mary Garget is a freehold owner, reputed freehold owner and/or occupier of 31,823m^2 of field, agricultural land and public footpath at Blandings Farm and 416m^2 of river, bed and banks thereof at River Kennett, as set out in more detail in the Book of Reference [**APP-024**]. This land is

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				required for part of Work No 4, being the laying down, maintenance and replacement and use of electrical cables. **Why land is required** As set out in the Statement of Reasons [**APP-022**], to ensure that the Scheme can be built, maintained and operated, and so that the Government's policies are met in relation to the timely provision of new generating capacity and meeting net zero carbon emissions targets for 2050, the Applicant requires the acquisition of property interests in third party ownership in respect of Grid Connection Route A. The Applicant has therefore applied for the grant of powers to facilitate acquisition and/or creation of new rights and interests, and to extinguish rights, over the required land. In respect of the land owned and/or occupied by Ms Garget, the Applicant is seeking to compulsorily acquire new rights and restrictive covenants over land to enable construction of the cable corridor and an easement for the underground cable itself and its protection, once installed. The Applicant will use the powers sought enable construction of the cable route for Grid Connection Route A. The Framework Construction Environmental Management Plan (FCEMP) [**REP3-015**] sets out the activities required for the construction of the cable route, which include site preparation and appropriate searches, excavation of the trench, segregation and storage of topsoil (to be reused), clearing and bottoming out of the trench, installation of sand bedding, and installation of cable (which will follow behind excavation in the same sequence). The cable trenches will be backfilled (using soil extracted during construction) and reinstated following construction. Agricultural soils excavated during this process will be managed, preserved, retained, and reinstated in accordance with Defra guidance. As possession of the land is required for construction only (although powers are required in relation to maintenance), it will be temporary in nature (noting that the cable itself will remain in situ at a depth of 2m below ground level). The Scheme Description [**REP2-022**] provides detail on the construction

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				programme for the cable route corridor, which will be undertaken in two concurrent phases over a 30-week period. **Negotiations with affected landowner** The Applicant has been in correspondence with Ms Garget, her land agent and solicitor since March 2019. Discussions regarding the acquisition of the necessary land interests began in June 2021. The Applicant has recently made a further attempt to contact the landowner's agent on 16 November 2022. To date no progress has been made in negotiations to acquire the rights required. The Applicant looks forward to continued negotiations with the affected person and would welcome discussion on the terms included in the Heads of Terms, including those in relation to objections to the application. For further details see the Schedule of Negotiations and Powers Sought [**REP3-007**].
REP2-161	Compulsory Acquisition		The proposed access route via the gate from the B1085 in relation to Dane Hill and strong opposition to any felling of existing trees at La Hogue.	**Owner/occupier of land** Joanna Reeks is a freehold owner or reputed freehold owner of approximately 2,092m^2 of land at or around Parkside; 90,371m^2 of land at or around La Hogue; 499,114m^2 at or around Dane Hill; 18,107m^2 at or around the A11; and 9,785m^2 north of A14 respectively, as set out in more detail in the Book of Reference [**APP-024**]. The above land is required for parts of Work Nos. 1C, 4, 6C, 7 and 9, as set out in the Schedule of Negotiations and Powers Sought [**REP3-007**]. **Why land is required** As set out in the Statement of Reasons [**APP-022**], the Applicant requires powers of compulsory acquisition to ensure that the Scheme can be built, maintained and operated, and so that the Government's policies in relation to the timely delivery of new generating capacity and achieving ambitious net zero targets are met. In respect of the land owned by Ms Reeks, the Applicant is seeking to compulsorily acquire new rights in some land and to compulsory acquire all interests, including freehold, in other land, which are required:

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				• for the construction, maintenance and replacement, use and decommissioning of solar modules, mounting structures, solar stations and associated electrical cables at Sunnica West Site A; • for the laying down, maintenance and replacement and use of electrical cables, including to existing streets to facilitate access to other parts of the Scheme; • to create, enhance existing and maintain green infrastructure including access tracks at Sunnica West Site A; and • for the construction, maintenance, use and decommissioning of temporary construction laydown areas at Sunnica West Site A. It is noted that land used for the construction, maintenance, use and decommissioning of temporary construction laydown areas would only be required temporarily, and so no permanent interest or right in plots covered by these works is required for these purposes. However, those plots also fall within other works numbers and so those plots are the subject of powers of freehold acquisition or the acquisition of new rights, for others works where applicable. The Applicant considers that in the absence of these powers, the Order land may not be assembled, uncertainty will continue to prevail, and its objectives and Government policy objectives would not be achieved. **Negotiations with affected landowner** The Applicant has been in correspondence with the Tilbrook Family and their solicitors since 2019. Heads of terms were signed in August 2019. At the request of the landowners the Option Agreement is now being dealt with by way of two Option Agreements which are in almost final form. For further details see the Schedule of Negotiations and Powers Sought [**REP3-007**]. Regarding the access from the B1085 negotiations on the Heads of Terms include discussions around this access route. The Applicant has offered to remove this area from the lease subject to suitable alternative wording for rights of access from the B1085 that would not prejudice the use of the land for the authorised development. Negotiations have also been held for the

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				shared use of the existing access track at Dane Hill and the Applicant now understands that shared use of this track has been agreed.
REP2-183	Compulsory Acquisition	A	Concerned that during construction of the Scheme it will be impractical to use facilities as works will prevent use of certain areas of Blandings Farm due to placement of cable on the land.	**Owner/occupier of land** Louise Skole Andreasen is the occupier of 31,823m^2 of field, agricultural land and public footpath at Blandings Farm. This area of land is owned by Ms Elizabeth Garget. Full details of owner/occupier rights over the land are provided in the Book of Reference [**APP-024**]. This land is required for part of Work No 4, being the construction of the cable route for Grid Connection Route A. **Why land is required** As set out in the Statement of Reasons [**APP-022**], to ensure that the Scheme can be built, maintained and operated, and so that the Government's policies are met in relation to the timely provision of new generating capacity and meeting net zero carbon emissions targets for 2050, the Applicant requires the acquisition of property interests in third party ownership in respect of Grid Connection Route A. The Applicant has therefore applied for the grant of powers to facilitate acquisition and/or creation of new rights and interests, and to extinguish rights, over the required land. In respect of the land occupied by Ms Andreasen at Blandings Farm, the Applicant is seeking to compulsorily acquire new rights and restrictive covenants over the land to enable construction of the cable corridor and an easement for the underground cable itself and its protection, once installed. The Applicant will use the powers sought to enable construction of the cable route for Grid Connection Route A. The Framework Construction Environmental Management Plan (FCEMP) [**REP3-015**] sets out the activities required for the construction of the cable route, which include site preparation and appropriate searches, excavation of the trench, segregation and storage of topsoil (to be reused), clearing and bottoming out of the trench, installation of sand bedding, and installation of cable (which will follow behind excavation in the same sequence).

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				The cable trenches will be backfilled (using soil extracted during construction) and reinstated following construction. Agricultural soils excavated during this process will be managed, preserved, retained, and reinstated in accordance with Defra guidance. As possession of the land is required for construction only (although powers are required for maintenance), it will be temporary in nature (noting that the cable itself will remain in situ at a depth of 2m below ground level). The Scheme Description [**REP2-022**] provides detail on the construction programme for the cable route corridor, which will be undertaken in two concurrent phases over a 30-week period. **Negotiations with affected landowner** As set out in the Schedule of Negotiations and Powers Sought [**REP3-007**], the Applicant has been in correspondence with Ms Garget, her land agent, and solicitor since March 2019. Discussions regarding the acquisition of the necessary land interests began in June 2021. The Applicant has issued multiple Requests for Information (RFIs) to confirm the landowners' interests within the land. A survey access licence was also completed on 29 June 2021. The Applicant issued Head of Terms to Ms Garget on 29 June 2021 with a view to reaching a voluntary agreement for the acquisition of the required rights in the land. The Applicant's agents offered to meet with Ms Garget and her agent on 20 July 2021. This offer was not accepted. Emails were also sent on 9 August 2021 and 6 September 2021 asking if the landowners' agent would be willing to meet to discuss the Heads of Terms. The offers were not accepted. To date no progress has been made in negotiations with Ms Garget to acquire the rights required. Whilst the Applicant will continue to seek to acquire the land and rights by voluntary agreement, 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 Grid Connection Route A.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				The Applicant considers that in the absence of these powers, the Order land may not be assembled, uncertainty will continue to prevail, and its objectives and Government policy objectives would not be achieved.
REP2-216	Compulsory Acquisition		General opposition to the scheme over its land.	**Owner/occupier of land** R. F. Tilbrook & Sons does not own or occupy any of the land included within the Book of Reference [**APP-024**] and therefore will not be directly affected by the Applicant's need for compulsory acquisition of land and rights. However, Heather Tilbrook, who submitted the written representation on behalf of R. F. Tilbrook & Sons, does own or occupy land within the Order limits. Other members of Ms Tilbrook's extended family (the "**Tilbrook Family**") also own and/or occupy land within the Book of Reference, including Richard Tilbrook, Charlotte Tilbrook and Joanna Reeks (see the Applicant's response to [**REP2-161**]). See the Book of Reference [**APP-024**] for more detail. **Engagement and agreement** Sunnica has been in correspondence with the Tilbrook Family and their solicitors since 2019. Heads of terms were signed in August 2019. Sunnica completed an access licence with the Tilbrook Family in March 2020. A draft option agreement for lease and easement was issued to the Tilbrook Family's solicitor in February 2020. Negotiations were undertaken by email and telephone throughout 2020 taking the documentation to an advanced stage. Negotiations stopped in November 2020. The Tilbrook Family advised that they no longer wished to participate in the scheme and requested that surveys cease (except in relation to a cable route within La Hogue). The access licence remained in place at this time. In December 2020 a Section 172 Notice was served on the Tilbrook Family.

Parties reference	Theme	Para ref (if app)	Summary of issue raised	Applicant's response
				Negotiations recommenced in April 2021. Negotiations were undertaken by email and telephone from April 2021 to November 2022. During the course of these negotiations the Tilbrook Family requested that the option agreement be dealt with by way of two option agreements – one option agreement for the lease and a second option agreement for the easement. The Applicant agreed to this request and issued two separate option agreements in June 2021 based on the option agreement that had been under negotiation since early 2020 and which was in a mature format. During the course of the negotiation the Tilbrook Family has raised various points which the Applicant has catered for in the drafting of the option agreements. Final comments were received from the Tilbrook Family's solicitor on 15 October 2022. These final comments are being dealt with by the Applicant so that updated versions of the documents can be provided to the Tilbrook Family's solicitor for approval in the hope that engrossments can then be issued for signature and exchange. The Applicant and the Tilbrook Family are keen to finalise and exchange the option agreements as soon as possible. In addition to the discussions in relation to the option agreement a phone call took place on 3 November 2022 between WSP and the Tilbrook Family where a revised option agreement plan was discussed. Amendments were made as per the landowners' request and updated copies issued on 7 November 2022.

5 Interested Parties Written Representations and the Applicant's individual responses

5.1 Theme 1 – Need

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-138, REP2-198, REP2-210	Need (planning balance)	The energy benefits from the Scheme are outweighed by its negative impacts on local communities.	The Applicant has undertaken its own assessment and respectfully disagrees. 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 11 of the Statement of Need [**APP-260**] concludes that developing the Scheme as proposed will be an essential near-term step in meeting government objectives of delivering sustainable development to enable decarbonisation and by doing so, 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. The energy benefits delivered by the scheme are of a substantial importance to the delivery of Net Zero. Section 7 of the Planning Statement Part 1 [**APP-261**] sets out the conclusion of the Planning Statement and states that: "…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." Ultimately it will be for the Secretary of State to decide whether the benefits of the Scheme outweigh its impacts.

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-243	Need	The Applicant plans to compulsory purchase high grade farmland and then if granted, sell on this land at a highly inflated price.	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. 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 11 of the Statement of Need [**APP-260**] concludes that developing the Scheme as proposed will be an essential near-term step in meeting government objectives of delivering sustainable development to enable decarbonisation and by doing so, 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. The energy benefits delivered by the scheme are of a substantial importance to the delivery of Net Zero. The Applicant has no plans to sell the Scheme prior to the conclusion of the planning process. 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
REP2-102, REP2-107, REP2-105, REP2-121, REP2-180, REP2-190, REP2-183, REP2-199, REP2-210	Need (Opposition)	There is almost universal opposition to this project within the local communities.	The Applicant notes this comment and acknowledges that there is opposition to 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

Parties reference	Theme	Summary of issue raised	Applicant's response
			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**].
REP2-208	Need	It has been admitted by the Applicant that the current technology will become outdated in a much shorter timescale than the life of the Scheme.	Details of the technology to be used for the Scheme 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. 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. The Statement of Need [**APP-260**] shows in Figure 5-1 the carbon emissions trajectory the UK electricity sector must follow in order to have a reasonable chance of meeting Net Zero. The implication is that delaying any progress along this trajectory will increase the required scale of future actions and increase the risk of delivery of Net-Zero obligations. Developing and commissioning the Scheme based on best available technology at the time of construction will deliver carbon reduction benefits which are essential to achieving Net Zero, and because of the cumulative warming effect of atmospheric carbon dioxide, waiting for "better" technology simply is not a credible option.
REP2-097, REP2-104, REP2-121, REP2-123, REP2-124, REP2-150, REP2-156, REP2-166, REP2-169,	Need	The real driver for the Scheme is the BESS rather than solar energy generation. Most of the planned storage will not be for solar generated power, but electricity drawn down from the grid	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

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-170, REP2-187, REP2-210, REP2-214, REP2-242, REP-243, REP2-253A, REP2-258		overnight at cheap rates and sold back to the grid at much higher prices during the day. Application documents are not clear enough about this.	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 assist in meeting 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. Further information on the relationship between the PV panels and the BESS are set out in Appendix B of the Applicant's response to the first written questions [**REP2-038**]
REP2-105, REP2-122, REP2-123, REP2-181, REP2-	Need	The Scheme is purely for the financial gain.	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 objective of the scheme,

Parties reference	Theme	Summary of issue raised	Applicant's response
208, REP2-210, REP2-243, REP2-249, REP2-177, REP2-229, REP2-229, REP2-236			and indeed the case for need for the Scheme, 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. Sunnica is not bringing this scheme forwards just for financial gain.
REP2-099, REP2-198, REP2-216, REP2-209	Need	If solar panels are needed, why are new homes being built without solar panels?	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, but *as well as* large-scale ground mounted schemes. This is because rooftop solar will not deliver 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. The Government's position, as set out in EN-1 (2011) is that "*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]*".
REP2-208, REP2-214, REP2-251	Need	The Scheme represents an inefficient form of the generation,	Solar PV is an established and proven technology, with a short construction/installation time compared to other electricity generation technologies and also has the benefit that it is reversible meaning that

Parties reference	Theme	Summary of issue raised	Applicant's response
		transportation and storage of electricity.	once decommissioned the land can return to its former use. It is also a very cost-effective technology, helping to deliver electricity to consumers at low cost. The proposed BESS supports the operation of the principal solar development by providing the ability to store the Scheme's solar generation when it is not needed and releasing it when it is needed. The 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.
REP2-102, REP2-117	Need	The case for utility-scale solar in this area is not proven.	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 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.

Parties reference	Theme	Summary of issue raised	Applicant's response
			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.
REP2-102	Need	Only 11% of the rated maximum output will reach the National Grid on average over a year.	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. These statements have been made based on an analysis of the anticipated "annual load factor" of the Scheme, which is assessed at approximately 11%. Further, 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.
REP2-215	Need (generating capacity)	The Scheme will generate less than 50MW more often than it generates in excess of this. This is not the reliable generating system that the Planning Act 2008 envisages in its definitions.	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. These statements have been made based on an analysis of the anticipated "annual load factor" of the scheme, which is assessed at approximately 11% and the anticipated

Parties reference	Theme	Summary of issue raised	Applicant's response
			daily profile of electricity generation given time of day, time of year through a range of possible weather conditions. In their 2020 Energy White Paper, Government confirmed their view that a "low-cost, net zero consistent system is likely to be composed predominantly of wind and solar"
REP2-236	Need	Energy trading through the BESS will increase electricity prices.	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 potential to exert downward pressure on electricity prices in common with other renewable energy projects.
REP2-102, REP2-208, REP2-216, REP2-254,	Need	The inefficiency of PV means that larger areas of land are needed than for any other generation technology.	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 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

Parties reference	Theme	Summary of issue raised	Applicant's response
			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.
REP2-196	Need (location)	The Scheme should not be built close to people as it breaches their right not to live in fear.	The Applicant recognises that there are safety concerns associated with the Scheme and has worked to ensure that any risks are mitigated and managed appropriately. 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 [**REP2-264**]; • Outline Battery Fire Safety Management Plan, Rev 01 [**REP2-032**]; and • Major Accidents and Disasters section of Chapter 16 – Other Environmental Topics [**APP-048**]. The Outline Battery Fire Safety Management Plan, provides a comprehensive review of the life safety and property protection fire safety

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			requirements of the BESS at Sunnica East Site A, Sunnica East Site B and Sunnica West Site A. With the measures outlined within it, 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 the plan. The Outline Battery Fire Safety Management Plan is an update to the original plan [**APP-267**] submitted with the application. The documents listed above 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 [REP2-264]. 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. Taken together, the Applicant believes that these features should give reassurance that the Scheme is safe to live alongside during its construction, operating life and decommissioning.

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REP2-102	Need (Location)	The Applicant has not demonstrated that there is any advantage in the location for supplying London/Cambridge.	The Scheme will not only – or specifically – supply London and Cambridge. The Scheme will connect to the National Electricity Transmission System and supply users nationwide. 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. The Applicant describes in Para 1.3.11 and elsewhere in the Statement of Need [APP-260] that the purpose of the NETS is to distribute power nationally to where it is needed. However there is opportunity to deliver that purpose in a more efficient way by locating schemes in specific places. For example, Scotland to England flows are currently constrained at times of high wind, and the electricity consumer pays through industry charges for the ESO to manage those constraints. Transmission losses are experienced as a function of distance from the point of generation to the point of supply (the national balance point), and generators located nearer to where demand is generally located (London and Cambridge have been used as an example) are therefore more efficient than if they were located further away. Lastly, National Grid, through the TNUoS (Transmission Network Use of System) regime, reflect the benefits of reducing infrastructure development needs by locating generators closer to demand. Sunnica, by virtue of its proposed location, is well located in respect of all of these points.
REP2-103	Need (planning balance)	The land as a whole can easily produce over 38,000t of food a year. 15% of the land will produce enough potatoes for 500,000 people per year, and a further	The Applicant is not aware of any policy which sets out that food production should be prioritised over renewable energy generation infrastructure.

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		10% will produce enough sugar for those people for a year, producing only enough electricity for 100,000 homes (250,000 people) seems a small return for the loss of land.	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: "Energy underpins almost every aspect of our way of life. It enables us to heat and light our homes; to produce and transport food…". 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 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 "land

Parties reference	Theme	Summary of issue raised	Applicant's response
			type should not be a predominating factor in determining the suitability of the site location". 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.
REP2-104, REP2-216	Need (Efficiency)	PV panels, batteries and cabling lose efficiency each year.	Draft NPS EN-3 already recognises this fact and states that: "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". Paragraph 2.49.9 of draft NPS EN-3 acknowledges that the design life of solar panels can sometimes be longer than 30 years During the Scheme's operating life, maintenance will be carried out and paid for by the operator. 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**]. The Applicant has considered the potential for replacing elements of the Scheme and part degradation over time in its due diligence for the Scheme and considers that the Scheme is viable.
REP2-187, REP2-216	Need (redundant technology)	Solar panels go out of date very quickly and therefore will be redundant far quicker than the projected 40-year life that the Applicant is claiming.	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]

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			and is referenced in Section 9.2 of the Statement of Need. Draft NPS EN-3 states that: "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". 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 into calculations for the performance of the Solar PV modules in assessing the climate change impact of the Scheme. During the Scheme's operating life, maintenance will be carried out and paid for by the operator. 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**]. The Applicant has considered the potential for replacing elements of the Scheme and part degradation over time in its due diligence for the Scheme and considers that the Scheme is viable.
REP2-104	Need	I am not sure how the Scheme will help secure affordable energy.	Solar 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 how solar generally acts to lower the cost of electricity in the UK. 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

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			[APP-260] draws on Government's view that "*a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar*". Further, Government makes clear its view that UK-based renewable electricity will help *secure* affordable energy for the UK in its April 2022 British Energy Security Strategy, in particular at the foreword which states: "... *If we're going to get 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... [and] we're going to take advantage of Britain's inexhaustible resources of wind and – yes – sunshine*"
REP2-113, REP2-210	Need	Areas where large scale solar has been trialled have turned against them due to their negative impact on the environment.	The Applicant disagrees with this conclusion. 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 principles 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 [APP259], 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 Scheme has been assessed to have a major beneficial effect on the climate during operations. 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.

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-113, REP2-184, REP2-191	Need	The Government should prioritise food security over energy security.	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: "Energy underpins almost every aspect of our way of life. It enables us to heat and light our homes; to produce and transport food…". 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

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			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 "land type should not be a predominating factor in determining the suitability of the site location". 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.
REP2-211	Need	Application doesn't correctly balance adaptation and mitigation over climate change - Britain will no longer be able to rely on cheap food imports and will increasingly need to grow its own food. It is for this reason that there is a presumption against solar farms on ALC 1to3a farmland.	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: "Energy underpins almost every aspect of our way of life. It enables us to heat and light our homes; to produce and transport food…". 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

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			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 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 "land type should not be a predominating factor in determining the suitability of the site location". 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. 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

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			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.
REP2-097	Need	With wetter winters and warmer drier summers light irrigated soil is becoming more valuable and availability should be given greater weight.	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.
REP2-199	Need	Former Prime Ministers and other MP's including our local MP's have expressed concern at	The Applicant notes this comment and accepts that individual MP's have said this. However, this is not currently government policy.

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		covering agricultural land with solar panels.	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. The loss of arable area as a result of the Scheme 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.
REP2-209, REP2-194	Need (loss of agricultural land)	Loss of agricultural land during a time when cost of living is increasing – farmland is essential to provide food	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

Parties reference	Theme	Summary of issue raised	Applicant's response
			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: "Energy underpins almost every aspect of our way of life. It enables us to heat and light our homes; to produce and transport food…". 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 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 "land type should not be a predominating factor in determining the suitability of the site location". 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

Parties reference	Theme	Summary of issue raised	Applicant's response
			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.
REP2-169	Need	The Application is speculative.	The Applicant respectfully disagrees with this statement. The Scheme is answering an urgent national need for forms of low carbon, renewable energy generation and has emerged as a result of an extensive design process as set out in Chapter 4: Alternatives and Design Evolution of the Environmental Statement [**APP-036**].
REP2-210	Need (carbon footprint)	Due to the 'lifetime' greenhouse gas emissions arising from the scheme, it will never deliver the carbon neutral requirement of the plan and net zero target aim of the Government.	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

Parties reference	Theme	Summary of issue raised	Applicant's response
			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 construction. Overall, the Scheme is considered to have a major beneficial effect on the climate.
REP2-210	Need (unknown impacts)	The impacts and consequences of the Scheme– during construction, operation, decommissioning and post-operation – are complete unknowns.	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. The results of these assessments are summarised in the Environmental Statement and its associated appendices.
REP2-210, REP2-212	Need	Already lots of smaller solar farms in the 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 set out in the Statement of Need [APP-260], 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.
REP2-208, REP2-253A,	Need	Overriding need for the proposals has not been demonstrated.	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 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

Parties reference	Theme	Summary of issue raised	Applicant's response
			generation assets at scale; security of supply (geographically and technologically diverse supplies); and affordability of electricity supplies. These statements have been made based on an analysis of the anticipated "annual load factor" of the scheme, which is assessed at approximately 11% and the anticipated daily profile of electricity generation given time of day, time of year through a range of possible weather conditions. In their 2020 Energy White Paper, Government confirmed their view that a "low-cost, net zero consistent system is likely to be composed predominantly of wind and solar" The evidence for these statements 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.
REP2-147	Need	The BESS is inefficient.	The Applicant disagrees with this statement, the BESS enhances the efficiency of the Scheme. The purpose of the BESS is to support 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.
REP2-243	Need	The Applicant has stated the big six energy companies are interested and this should be evidenced.	The Applicant does not consider this to be relevant to the Examination of the Application.

5.2 Theme 2 – Client Design

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-100, REP2-108, REP2-258,	BESS	The size of the BESS should be limited in order to limit the release of toxic chemicals in the result of a fire.	There is no need to limit the power capacity of the BESS in order to limit the release of toxic chemicals in the result of a fire. The BESS will be designed in accordance with the minimum safety standards proposed by the Outline Battery Fire Safety Management Plan **[REP2-032]**, which is shown in Table 4 of that document. The final Battery Fire Safety Management Plan will confirm and update these standards, as necessary, for approval by the relevant planning authorities prior to construction of the BESS being constructed. However as indicated in the DCO ISH the Applicant is willing to consider an upper limit on the BESS provided appropriate drafting can be agreed.
REP2-102, REP2-108, REP2-182, REP2-187, REP2-192, REP2-209	BESS	If consented, the Scheme could become, within the DCO limits, the largest BESS system in the world.	The BESS is proportionate in size to the solar PV in terms of both power and energy. This is further explained in Appendix B of the Applicant's Response to First Written Questions **[REP2-038]**. In terms of energy if the BESS were to be configured with four hours of energy for every MW of power then it would be capable of being fully charged by the solar PV during 6 months of the year, charged for between two to four hours during two months of the year and for approximately two hours during four months of the year. This demonstrates that the BESS would be proportionate in size to the energy production from the solar PV.
REP2-097, REP2-102, REP2-105, REP2-208, REP2-243, REP2-258	BESS	The Applicant has identified 31 Ha of land for BESS, far more than that required to support PV generation.	The Applicant's Response to the First Written Questions – Appendix B **[REP2-038]** sets out at Para 21 – 23 evidence which demonstrates that the BESS is proportionate to the nature and scale of the principle development. The Applicant has identified 31 Ha of land for the BESS in order to be in a position to design a BESS that is proportionate in size to the solar PV and is able to meet all the relevant fire safety criteria as set out in the Outline Battery Fire Safety Management Plan **[REP2-032]**. Indicative layout plans have been prepared and presented in this document.
REP2-098A	Solar PV	It is not acceptable to have 1.1 million panels that reach 13ft in height.	As set out by the Design Principles submitted as Appendix B of the Design and Access Statement [**APP-264**] and ES Chapter 3 [**REP2-022**], the maximum height of solar panels above ground level will be 2.5m. This equates to approximately 8.2 feet.

Parties reference	Theme	Summary of issue raised	Applicant's response
			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. In light of this assessment and its wider assessments, the Applicant considers the Scheme to be acceptable.
REP2-100	Generating capacity	PINS should require a definite outcome for the project in terms of generating capacity and battery storage.	This matter was considered at the DCO ISH. The Applicant's position is recorded in paragraphs 4.2 and 4.3 of its written summary of the oral submissions made **[REP2 – 036]**.
REP2-100	Generating capacity	The Applicant is using the Rochdale Envelope to be able to deliberately amend the Scheme if it cannot raise enough investment.	This is not true. 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. Details of how the Applicant proposes to fund the DCO are provided in the Funding Statement [**APP-023**].

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-098A, REP2-155, REP2-256	Grid connection	The cable route to the point of connection is too long and will be inefficient.	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.
REP2-098A	Technology	The panels decrease in efficiency over their lifetime.	The Applicant acknowledges the potential for decreases in the efficiency of the panels overtime. 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**].
REP2-102	Design	The design is undoubtedly driven by land availability rather than a cohesive design process. By necessity, as a result, the scheme requires three substations, three BESS compounds and a 24km long cable from Sunnica East A to Burwell. A different design located elsewhere might be more efficient.	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

Parties reference	Theme	Summary of issue raised	Applicant's response
			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.
REP2-208	Design	The lack of proper research and consultation at the outset has damaged this proposal.	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. The Scheme has been the subject of a large volume of assessments and design work. This is summarised in the Environmental Statement [**APP-032** to **APP-259**].
REP2-160	BESS	The BESS should be located closer to the point of connection.	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.
REP2-102	Scale	A much smaller Scheme would be far more acceptable.	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.

Parties reference	Theme	Summary of issue raised	Applicant's response
			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.
REP2-232	Technology	The efficiency of solar power in this area needs to be properly understood. I installed a 4kw solar array in Worlington 7 years ago. The kw/h production for the 6-month period between November and March over this 7-year period is only 16.6% of the total generation over the whole year. This is during the period of highest demand. Sunnica cannot possibly generate enough solar energy during these winter months so it will rely on buying electric directly from the main grid during off-peak hours, storing it and then exporting it back to the grid during peak times (and make a profit). The solar arrays planned are simply trying to disguise this fact.	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 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.
REP2-233	Location	The solar and BESS sites are located too far from the Burwell	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

Parties reference	Theme	Summary of issue raised	Applicant's response
		National Grid Substation and should be located closer to it.	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.
REP2-247	Worlington	Areas of panels and fencing are shown as coming right up to the built-up area of Worlington and to the roadside when approaching the village from the east, west and south.	Worlington is close to the 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).
REP2-242	Scale	The Scheme is inefficient due to its scale.	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. These statements have been made based on an analysis of the anticipated "annual load factor" of the scheme, which is assessed at approximately 11% and the anticipated daily profile of electricity generation given time of day, time of year through a range of possible weather conditions.

Parties reference	Theme	Summary of issue raised	Applicant's response
			In their 2020 Energy White Paper, Government confirmed their view that a "low-cost, net zero consistent system is likely to be composed predominantly of wind and solar" The Applicant disagrees that the Scheme is inefficient owing to its scale. Solar PV technology is modular in nature and operational scale does not reduce generation efficiency. Further, greater scale facilitates an increased utilisation of the grid connection point at Burwell, delivering efficiencies therefore into the infrastructure and operational costs (portions of which are borne by consumers) associated with the National Electricity Transmission System. Further, some of the fixed costs associated with the upfront construction and operations to be distributed on a more cost-efficient basis then would be the case were the solar PV installation at a smaller scale. Chapter 9 of the Statement of Need [**APP-260**] describes how solar economics helps reduce the cost of electricity for consumers. At the time of construction, the scheme will select the optimal panels which will include consideration regarding their efficiency which will ensure that the scheme's efficiency is optimised at the time for construction. Finally, the Applicant notes that in Draft Revised EN-3, the government states that "Along with associated infrastructure, generally a solar farm requires between 2 to 4 acres for each MW of output" (Para 2.47.2). The Sunnica scheme will deliver within that range, demonstrating that it is efficient in terms of land take at the proposed scale,
REP2-208	Recreation	Suggestions to incorporate leisure facilities such as viewing platform, nature reserves/parkland, dog walking areas etc. have been ignored by the Applicant.	The Applicant disagrees with this assessment and has looked to provide enhancements where possible. These include new permissive routes (amended in response to feedback received during the statutory consultation). 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;

Parties reference	Theme	Summary of issue raised	Applicant's response
			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. In addition to this, the Applicant is providing a number of ecological enhancement areas (although it is not proposed that any new public access is provided to these areas). The ecological enhancement areas are marked as ECO1, ECO2, ECO3, ECO4 and ECO5. These areas are shown in the Scheme parameter plans [**APP-135**] and [**APP-136**].

5.3 Theme 3 – Land

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-097, REP2-098A, REP2-099, REP2-101, REP2-102, REP2-103, REP2-104, REP2-105, REP2-106, REP2-107, REP2-108, REP2-111, REP2-114, REP2-116, REP2-117, REP2-118, REP2-120, REP2-121, REP2-124, REP2-125, REP2-132, REP2-134, REP2-135, REP2-138, REP2-139, REP2-140, REP2-145, REP2-146, REP2-147, REP2-149, REP2-152, REP2-155, REP2-157, REP2-160, REP2-162, REP2-164, REP2-166, REP2-167, REP2-171, REP2-172, REP2-173, REP2-176, REP2-177, REP2-178, REP2-180, REP2-181, REP2-182, REP2-184, REP2-186, REP2-187, REP2-189,	Agricultural land	The Scheme will remove a significant amount of land from agricultural production, risking the UK's food security.	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. The Applicant is not aware of any policy relevant to the determination of the Application 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 [**PDB-001**]. 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: "*Energy underpins almost every aspect of our way of life. It enables us to heat and light our homes; to produce and transport food…*". 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

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-191, REP2-192, REP2-193, REP2-194, REP2-196, REP2-197, REP2-200, REP2-201, REP2-202, REP2-208, REP2-210, REP2-214, REP2-216, REP2-222, REP2-224, REP2-226, REP2-227, REP2-228, REP2-229, REP2-230, REP2-233, REP2-234, REP2-235, REP2-237, REP2-239, REP2-241, REP2-243, REP2-251, REP2-253A, REP2-255, REP2-256, REP2-258, REP2-242			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 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 "land type should not be a predominating factor in determining the suitability of the site location". 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 - "*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.*" As well as addressing climate change, the reversion of arable land to grass for 40 years will allow soil health to recover.

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-097, REP2-104, REP2-106, REP2-107, WR-017, REP2-117, REP2-118, REP2-121, REP2-124, REP2-135, REP2-138, REP2-152, REP2-160, REP2-182, REP2-183, REP2-192, REP2-208, REP2-210, REP2-216, REP2-218, REP2-233, REP2-234, REP2-235	Agricultural land	There is no guarantee that the agricultural land used for the Scheme will be able to be used as farmland again.	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. The DCO requirements are enforceable against the person with the benefit of the Order, and breach of the DCO is a criminal offence. 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. *Defra R&D Evaluation of mineral sites restored to agriculture – LE0206 (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). Ultimately, upon decommissioning, the land will be returned to the current landowners, who will then decide how the land is managed moving forward. Amendments to the Framework DEMP submitted at Deadline 2 [REP2-028] added the measures referred to above in relation to management and protection of soil, and also confirmed: "*Landscape and ecology mitigation will be left in situ following decommissioning; however, the Scheme will be returned to the land owner in a condition where the previous farming activities, those undertaken prior to construction, could be undertaken.*"
REP2-111, REP2-121	Agricultural land	The East of England represents the most important region for arable cropping. This would be undermined by the Scheme.	Any loss of land for agricultural production would be temporary and not at a scale sufficient to undermine the agricultural productivity of the entire East of England region.

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-128	Agricultural land	We would not be able to eat local produce which would erode our sense of identity and sense of pride.	The Applicant disagrees with this assessment as local agricultural production would continue alongside the Scheme were it to receive development consent.
REP2-097, REP2-098A, REP2-102, REP2-103, REP2-104, REP2-111, REP2-120, REP2-124, REP2-125, REP2-133, REP2-135, REP2-136, REP2-139, REP2-145, REP2-152, REP2-153, REP2-160, REP2-166, REP2-179, REP2-180, REP2-194, REP2-196, REP2-202, REP2-208, REP2-227, REP2-257	Agricultural land	The land being used for the Scheme is productive and the range of crops and yields achieved is not consistent with this being poor quality.	The Applicant has submitted a detailed ALC assessment [APP-238] [APP-239] that follows the recommendations given by Natural England in TIN049. Natural England provide ALC expertise to planning authorities. The National Policy Statement for Energy EN-1 para 5.10.15 states "*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.*" *Para 5.10.8 states "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."* 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,

Parties reference	Theme	Summary of issue raised	Applicant's response
			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.
REP2-098A	Agricultural land	The impact of using agricultural land for the Scheme must be seen in the context of other solar farms coming forward in the area.	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.
REP2-134	Agricultural land	The use of agricultural land for the Scheme may cause food prices to increase.	Impacts on food 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 it is not the Applicant's experience that solar development impacts negatively upon food prices.
REP2-200, REP2-234	Agricultural land	The Scheme will take over much needed prime grazing land used by horses, cattle and sheep.	The Order limits will remain agricultural land in agricultural use through the operational life of the Scheme. This land will be managed as low input pasture and grazed by sheep or other small livestock.
REP2-097	Agricultural land	This area would generate in excess of 32,500 tonnes of produce per annum making a net profit in excess of £850,000 if retained for agricultural use.	Impacts on food prices are not an important and relevant matter 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 it is not the Applicant's experience that solar development impacts negatively upon food prices.
REP2-097, REP2-101, REP2-102, REP2-105, REP2-121, REP2-123, REP2-208, REP2-	Decommissioning	The site will be classed as brownfield once the Scheme is removed and be vulnerable to future 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

Parties reference	Theme	Summary of issue raised	Applicant's response
210, REP2-233, REP2-235, WR-142			Environmental Management Plan that will be approved by the relevant local planning authority. The land will be returned to the current landowners (inclusive of ecological and landscape mitigation). If they wish to undertake any change of use of the land, then this would require planning permission from the local planning authority.
REP2-097, REP2-107,	Cumulative impacts	The Scheme will open the door to further industrial development.	The Applicant respectfully disagrees. Any application for planning consent for industrial development would be considered on its merits. Equally, the DCO application for the Scheme should be decided on the merits of the scheme for which development consent is sought. Unfounded speculation about notional other future developments is not important or relevant to consideration of the Scheme. In addition, no precedent for continued or new development following decommissioning will be created by the Scheme. Decommissioning of the authorised development will be undertaken pursuant to the approved Decommissioning Environmental Management Plan (DEMP) that must be approved prior to decommissioning under requirement 22 of the draft DCO. The DEMP must be substantially in accordance with the Framework Decommissioning Environmental Management Plan that has been submitted with the DCO Application in Appendix 16E of the Environmental Statement [APP-125]. The DEMP will enable the land, once decommissioned, to be returned to agriculture (subject to area of ecological and landscape mitigation). Any future proposed change of use or development of the Order limits land following decommissioning would require planning or development consent. The baseline for consideration of an application for such a consent would be the post-decommissioning status of the land, which would be greenfield land.
REP2-099, REP2-117, REP2-121, REP2-124, REP2-	Cumulative impacts	There are lots of solar farms coming forward in the area.	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,

Parties reference	Theme	Summary of issue raised	Applicant's response
125, REP2-128, REP2-208, REP2-256			[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.
REP2-099, REP2-117, REP2-121, REP2-124, REP2-125, REP2-128, REP2-208, REP2-256,	Cumulative impacts	There is a lot of development coming forward which has constrained land available for farming.	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.
REP2-201	Cumulative impacts	Loss of local land to housing developments is becoming difficult to cope with.	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.
REP2-169	Cumulative impacts	Assessment of cumulative impacts is too general to be relevant.	The Applicant respectfully disagrees. 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.

5.4 Theme 4 – Consultation

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-097, REP2-098A, REP2-117, REP2-118, REP2-119, REP2-121, REP2-132, REP2-138, REP2-142, REP2-166, REP2-169, REP2-179, REP2-186, REP2-189, REP2-196, REP2-208, REP2-235, REP2-255, REP2-214, REP2-241	Consultation	The Applicant has not consulted extensively on the Scheme.	The Applicant disagrees with this statement. The Applicant has prepared its proposals having had regard to feedback received from all 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**].
REP2-166, REP2-210, REP2-243	Consultation	The Applicant has refused to engage meaningfully with the local community; the quality of project information throughout has been poor, as has access to it; even at this stage there are still too many unknowns.	The Applicant disagrees with this assessment. The Applicant has published a large volume of information during the non-statutory and statutory consultations to inform consultees understanding of the Scheme as part of its meaningful engagement with the community. This included the Preliminary Environmental Information Report (PEI Report) during the statutory consultation. The Applicant has provided access to information in hard copy and online during the non-statutory and statutory consultation, as well as holding both in person and online events with the community both during and outside of the consultation periods. The high number of responses received during each consultation reflect the high level of engagement with each. The Applicant considers the engagement has been meaningful as the level of detail provided at each round of consultation has been appropriate at the point of Scheme development, and it has been sufficient to inform responses on the Scheme. It is established practice that detailed design is finalised following grant of consent and prior to commencement of construction. Requirement 6 of

Parties reference	Theme	Summary of issue raised	Applicant's response
			the draft DCO requires the Applicant to seek approval of the detailed design of the Scheme for each phase prior to commencing that phase. The detailed design must accord with the documents specified in requirement 6, including the design principles, flood risk assessment and the approved battery fire safety management plan. Whilst the final details of the Scheme are not yet confirmed, 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, which formed part of the statutory consultation materials, and made available to consultees as part of the Environmental Statement submitted with the DCO application.
REP2-097, REP2-098A, REP2-104, REP2-118, REP2-121, REP2-124, REP2-132, REP2-138, REP2-169, REP2-196, REP2-255	Consultation	Consultation information did not provide enough detail about the Scheme.	The Applicant considers the level of detail provided at each round of consultation has been appropriate at the stage of development the Scheme was at during the consultation, and that this has enabled consultees to provide informed responses that reflected the stage of project development. The Applicant acknowledges that it is not possible to provide detailed information on the final design of the Scheme during the pre-application consultation periods. However, it is established practice in many major infrastructure projects that detailed design is finalised prior to commencement of construction once consent has been granted. As noted above, the detailed design must accord with the documents specified in requirement 6, including the design principles, flood risk assessment and the approved battery fire safety management plan. Whilst the final details of the Scheme are not yet confirmed, 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, which formed part of the statutory consultation, and made available to consultees as part of the Environmental Statement submitted with the DCO application.

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-098A, REP2-104, REP2-124, REP2-176, REP2-189, REP2-233, REP2-235	Consultation	Offered online webinars but this discriminated against older residents who could not access them.	The Applicant recognises that some people may have been unable to engage with the webinars during the statutory consultation. The Applicant therefore offered the opportunity for people to have a one-to-one telephone conversation with the project team about specific issues of interest. The Applicant's dedicated freephone contact details was published in the consultation materials that were available in hard copy and online. Analysis of the responses does not support the statement that older members of the community were not able to participate in the consultation as 52% of those who indicated their age in consultation feedback were over the age of 60.
REP2-097, REP2-187, REP2-208, REP2-235, REP2-243	Consultation	The webinars were unsatisfactory and did not provide answers to our questions.	The Applicant provided several ways for people to find out more information during the statutory consultation including webinars with online Q&A sessions, telephone surgeries and by providing email, post and freephone contact details in consultation materials so that questions could be asked of the Applicant. During the webinars, the Applicant answered as many questions as it could. This included extending the time of webinars to take additional questions and publishing responses to any questions that could not be answered during the webinars on its website. The nature of some questions on the final design meant that it was not possible to give a detailed response to certain questions during the statutory consultation, as the detailed design will be finalised post consent, and the environmental information presented in the Preliminary Environmental Information Report (PEI Report) was preliminary in nature. This is common practice during statutory consultation and does not represent a refusal by the Applicant to answer questions. Since submission of the DCO Application in November 2021, the Applicant has undertaken further community engagement so that members of the public can ask questions on the information submitted in the DCO Application.
REP2-098A, REP2-099, REP2-104, REP2-118, REP2-121, REP2-124,	Consultation	Applicant did not show up to any meetings in the area.	This is not true. The Applicant held a number of in-person events during the non-statutory consultation and has subsequently attended meetings in-person in the area following acceptance of the Application. This has included further consultation on the Applicant's changes to the

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-176, REP2-186, REP2-233			application. Due to team availability, it has not always been possible to attend every meeting.
REP2-098A, REP2-169, REP2-208	Consultation	The Applicant has adopted a policy of working against the community, instead of negotiating and informing.	The Applicant disagrees with this assessment. The Applicant has sought the views of the community across two rounds of consultation prior to submission of the Application and during the later changes consultations. It has published the responses received, and an explanation of how it has had regard to them, in the Consultation Report [**APP-026**] and Consultation Report Appendices J-1 to J-5 [**APP-030**]. Feedback received from the community has played an important role in shaping the Scheme's design. Further information on the design evolution of the Scheme is given in Chapter 4: Alternatives and Design Evolution of the Environmental Statement [**APP-036**].
REP2-098A, REP2-118, REP2-121, REP2-134, REP2-166, REP2-210	Consultation	The Applicant used the pandemic to its own advantage.	This is not true. The statutory consultation was held in compliance with the regulations in place at that time and was in accordance with the Statement of Community Consultation (SoCC) that was developed in consultation with the host local authorities. Further information on the Applicant's consultation activity is available in the Consultation Report [**APP-026**] and Consultation Report Appendices J-1 to J-5 [**APP-030**].
REP2-098A, REP2-133, REP2-213	Non-statutory consultation	The non-statutory consultation on changes to the DCO was unsatisfactory.	The Applicant disagrees with this assessment. The Applicant's change request [**AS-243**] has now been submitted and accepted into the Examination. It is available to comment on through the Examination process.
REP2-098A, REP2-099, REP2-124, REP2-133, REP2-208, REP2-210, REP2-243	Consultation	Consultation has contained misleading and incorrect information.	The Applicant disagrees with this assessment. The consultation materials have been prepared to inform consultees and enable them to provide feedback on the Scheme as it has developed. Copies of the Applicant's consultation materials are available in the Consultation Report appendices [**APP-027**] to [**APP-031**].
REP2-098A, REP2-104, REP2-208,	Statutory consultees	The Applicant has not engaged properly with National Grid requiring amendments to the DCO Application.	The Applicant has engaged on an ongoing basis thoroughly with National Grid Electricity Transmission (NGET) with regard to the Application and, more specifically, its changes to the DCO application as set out in the change request [AS-243].

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-099	Compulsory acquisition	The prospect of compulsory acquisition was not mentioned in consultation materials.	The Applicant has written to all landowners within the Order limits to inform them that its preferred route for securing the land rights required for the Scheme is by reaching voluntary agreement. However, landowner engagement letters have been clear, should this not be possible in all cases, the Applicant is also seeking powers of compulsory acquisition as part of the DCO to ensure it is able to deliver the Scheme once consented [**APP-025**].
REP2-104	Compulsory acquisition	Residents in Burwell have reported the Applicant walking onto their land without permission and when asked to leave have been verbally abused and threatened	The Applicant does not recognise the account given in this accusation. The Applicant has only sought access to enter land through prior agreement or through serving a statutory notice and has not behaved in the way described. If the parties involved wish to provide further detail, then the Applicant will investigate this matter.
REP2-118	Consultation	The formal planning process is discriminatory to those that lack computer knowledge.	Information is available in alternative formats during the Examination. For further information please contact the Planning Inspectorate's case team on 0303 444 5000.
REP2-124, REP2-132,	Consultation	There were no consultation events in Worlington.	This is not the case. The Applicant held a public exhibition in Worlington on 21 June 2019.
REP2-097, REP2-162, REP2-169, REP2-213	Consultation	The Applicant has failed to reply to emails/letters.	The Applicant has sought to respond to all the enquiries that it has received. If the parties involved wish to provide further detail, then the Applicant will investigate this matter.
REP2-097,	Consultation	The Applicant did not visit Chippenham throughout the consultation process.	This is not the case. The Applicant held a public exhibition in Chippenham on 28 June 2019.
REP2-196	Consultation	The Applicant did not make their land survey results public during the consultation.	There is no requirement to publish agricultural land classification (ALC) data during statutory consultation. The PEIR is a preliminary assessment and it is normal for the PEIR to be published whilst assessments are on going, with the PEIR making assumptions for consultation in accordance with the relevant regulations. The results of the assessments are made

Parties reference	Theme	Summary of issue raised	Applicant's response
			known in the Environment Statement, which confirms where the assumptions made in the PEIR are the same as the results of the EIA, or where there is a difference the Environment Statement highlights that difference so that it is clear as part of the DCO Application. The Applicant has provided its ALC assessment [APP-238] [**APP-239**] in its DCO application, which is in plenty of time for the information to be reviewed and considered as part of the Examination.
REP2-133, REP2-169	Consultation	Communicating the Applicant has been difficult and unpleasant.	The Applicant has provided a number of channels through which people can get in touch. These include freephone, freepost and email.
REP2-133	Landowner negotiation	Within the letters received from the Applicant there is always a reference to the possibility that it may use the right to use a compulsory access notice to gain entry to the farm for their work. The Applicant has never given details of its planned work, such as cable size or depth or how long the proposed work will take to install.	The Applicant does not agree that there is frequent reference to the use of compulsory access other than the Applicant being clear with landowners that its preference is to reach voluntary agreement with landowners, but in cases where this isn't possible, it is seeking compulsory acquisition powers to ensure it can deliver the Scheme. The Applicant has provided plans as part of its landowner engagement letters, which show the lineation of the grid connection route and the landowners property on multiple occasions. The detailed design of the Scheme is yet to be finalised. Once consented, the Applicant will progress the detailed design and submit it for approval by the relevant local planning authorities pursuant to requirement 6 of the draft DCO.
REP2-133	Landowner negotiation	I have received a Head of Terms for the option for Easement from the Application, but it seems to be greatly in favour of Application. It includes a wide strip of land and restricts what I am allowed to do with it in the future or what I am allowed to say about the Application.	The Applicant's preference is to deliver the Scheme through negotiated agreement. Heads of terms are intended to assist agreeing the main points of an agreement in principle, prior to formal legal documentation being drawn up, The Applicant would be happy to discuss any aspects of those heads of terms as part of such negotiations.

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-257	Consultation	We were not consulted or contacted by the Applicant despite living 50m from the Scheme boundary.	The Applicant wrote to all addresses available through Royal Mail's records within Consultation Zone 1 (which includes addresses within 50m of the Order limits) as set out in the Statement of Community Consultation published ahead of the statutory consultation. In addition to this, the Applicant also wrote to those with an interest in the land as required by the Planning Act 2008. The Applicant also erected site notices and publicised the statutory consultation in local and national newspapers and online. This activity is set out in the Consultation Report [**APP-026**]. The Planning Inspectorate found that the Applicant has complied with its pre-application consultation requirements when it accepted the Application for Examination.
REP2-233	Consultation	The Applicant did not consult adequately with the residents of Isleham given changes to the design that happened between the non-statutory and statutory consultations.	The Applicant disagrees with this assessment. 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 consulted in line with the approach set out in the SoCC and was found by the Planning Inspectorate to have complied with its pre-application consultation requirements when it accepted the Application for Examination.
REP2-172, REP2-234	Consultation	The Applicant has not addressed the concerns of local residents.	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 the Applicant's 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

Parties reference	Theme	Summary of issue raised	Applicant's response
			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].
REP2-235	Consultation	The webinars were held at inconvenient times.	The Applicant held 15 webinars in total during the statutory consultation. This included six topic-specific webinars that were each held twice to give consultees an opportunity to attend a second event if they could not attend the first one. The topic-specific webinars were scheduled either for 2:00pm on Saturdays or 6:00pm on Thursdays. The Applicant held three additional webinars after the consultation period was extended, each of which was held on a Wednesday evening at 7:00pm. Each webinar was recorded and made available on the project website. One webinar recording broke, and the Applicant transcribed responses to each question answered and uploaded this as a pdf document with the recording to compensate for the lack of recorded content. The Applicant does not consider the range of times to be inconvenient.
REP2-235	Consultation	Our questionnaire from the consultation was returned saying that it arrived too late.	The Applicant did not return any questionnaires received to the consultation response freepost following the end of the consultation.
REP2-166	Publicity	Publicity materials did not draw sufficient attention to the consultation.	The Applicant disagrees with this assessment. The Applicant's consultation adverts, notice and activities are included in the Consultation Report [**APP-026**] and Consultation Report appendices [**APP-027**] to [**APP-030**] and this complied with the requirements of the Planning Act 2008 where relevant.
REP2-243	Consultees	The Application is missing reports from EPA, Natural England, HSE, English Heritage,	The Applicant is not required to submit individual reports from the organisations listed; however, where these bodies are statutory consultees under the Planning Act 2008 regime they have been consulted

Parties reference	Theme	Summary of issue raised	Applicant's response
		Fire and Rescue Service and the Police.	as part of the consultation process. Further information is provided in the Consultation Report [**APP-026**]. Where the organisations listed responded to the Applicant's consultations, details are provided in the Consultation Report. Any representations made by the listed organisations during the Examination of the Application can be viewed on the Sunnica Energy Farm page of the National Infrastructure Planning website. It should be noted that English Heritage is now called Historic England and the Applicant assumes that the reference to the EPA is the Environment Agency.
REP2-208	Information	No "Executive Summary" of the project explaining the size, scope, consequences and implications was ever produced that clearly set out the implications of such a project.	The Applicant disagrees. The consultation booklet produced for the statutory consultation provided a summary of the proposals and findings contained within the PEI Report. The Applicant also published a non-technical summary of the PEI Report at the start of the statutory consultation.
REP2-208	Consultation zone	Towns such as Mildenhall and Newmarket were not mail dropped to inform residents about the Scheme.	The Applicant wrote to over 10,000 addresses in the vicinity of the Scheme at the outset of the statutory consultation. This area took in locations around, but not all of, Mildenhall and Newmarket. This was in line with the approach set out in the SoCC.

5.5 Theme 5 – Environment/Planning Design

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-097, REP2-098A, REP2-099, REP2-102, REP2-105, REP2-107, REP2-117, REP2-118, REP2-119, REP2-121, REP2-138, REP2-160, REP2-167, REP2-180, REP2-183, REP2-196, REP2-215, REP2-227, REP2-233, REP2-236, REP2-253A	Scale	The scale and sprawling nature of the Scheme means it will be hard for people living locally to escape the impact of the Scheme as it cannot integrate into the landscape.	The size and shape of the Scheme is necessary in order to deliver the scale of renewable energy generation benefit that the Scheme will provide. Further detail is provided in the Statement of Need **[APP-260]**. The design of the Scheme has been shaped by detailed studies of the character of the landscape and settlements and engagement with stakeholders including through community consultation. As a result of the design approach taken by the Applicant, the design of the Scheme incorporates offsets from solar farm structures to settlement edges, existing vegetation, including hedgerows, public rights of way and road networks. The design of the Scheme also conserves field patterns, ecology and historical features (including below ground archaeology) across the Order limits, including pine lines. This approach preserves the sense of identity of the landscape. The Design and Access Statement **[APP-264]** describes how the Applicant's approach to the development of the design of the Scheme has been sensitive to place and local character. The Applicant has prepared a Technical Note on Settlement Design Iteration as Appendix A to the Applicant's Response to the First Written Questions **[REP2-038]**. This explains in more detail how the Scheme has been refined through the design development process so as to be sympathetic to its setting and communities.
REP2-097, REP2-098A, REP2-106, REP2-116, REP2-117, REP2-121, REP2-124, REP2-132, REP2-157, REP2-160, REP2-161, REP2-164, REP2-167, REP2-172, REP2-181, REP2-182, REP2-192, REP2-196, REP2-199, REP2-202, REP2-208, REP2-212, REP2-216, REP2-225, REP2-227, REP2-236, REP2-239, REP2-242, REP2-	Scale	I object to the Scheme because of its size.	

Parties reference	Theme	Summary of issue raised	Applicant's response
241, REP2-253A, REP2-257, REP2-258			
REP2-215, REP2-231 REP2-196	Scale	The size of the Scheme is disproportionate to local need.	
REP2-243	Design	There appears no thought in the design as it appears it's just thrown together in random manner and joined up by lots of cables. By doing this the Applicant is able to maximise profits by charging more for additional infrastructure which could have been avoided if a more professional, thoughtful, cohesive project design had been submitted.	
REP2-097	Grazing	Sheep grazing under the panels is a token gesture and is not sustainable agriculture.	Sheep or other small cattle grazing is a form of agriculture that can be capable of being undertaken on land that is in use as a solar farm. The alternative would be to not consider the potential for sheep or other small cattle grazing during operation of the Scheme.
REP2-106	Location	It is too close to Isleham.	The Applicant has prepared a Technical Note on Settlement Design Iteration as Appendix A to the Applicant's Response to the First Written Questions **[REP2-038]**. This explains in more detail how the Scheme has been refined through the design development process so as to be sympathetic to its setting and communities, including Isleham.
REP2-097	Location	It is in the wrong place	ES Chapter 4 **[APP-036]** and the Alternative Sites Assessment **[APP-054]** provide information on the main alternatives considered by the Applicant and the reasons for the Applicant's decision.
REP2-098A, REP2-109, REP2-117, REP2-121, REP2-172, REP2-181,	Location	It is far too close to homes and villages.	The Applicant has prepared a Technical Note on Settlement Design Iteration as Appendix A to the Applicant's Response to the First Written Questions **[REP2-038]**. This explains in more detail how the Scheme has

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-184, REP2-196, REP2-197, REP2-234, REP2-235, REP2-236, REP2-237, REP2-243			been refined through the design development process so as to be sympathetic to its setting and communities.
REP2-098A	Location	The Scheme comes too close to Worlington	The Applicant has prepared a Technical Note on Settlement Design Iteration as Appendix A to the Applicant's Response to the First Written Questions **[REP2-038]**. This explains in more detail how the Scheme has been refined through the design development process so as to be sympathetic to its setting and communities, including Worlington.
REP2-099, REP2-197, REP2-208	Location	The scale of the Scheme is ill-suited to the area.	The size and shape of the Scheme is necessary in order to deliver the scale of renewable energy generation benefit that the Scheme will provide. The design of the Scheme has been shaped by detailed studies of the character of the landscape and settlements and engagement with stakeholders including through community consultation. As a result of the design approach taken by the Applicant, the design of the Scheme incorporates offsets from solar farm structures to settlement edges, existing vegetation, including hedgerows, public rights of way and road networks. The design of the Scheme also conserves field patterns, ecology and historical features (including below ground archaeology) across the Order limits, including pine lines. This approach preserves the sense of identity of the landscape. The Design and Access Statement **[APP-264]** describes how the Applicant's approach to the development of the design of the Scheme has been sensitive to place and local character. The Applicant has prepared a Technical Note on Settlement Design Iteration as Appendix A to the Applicant's Response to the First Written Questions **[REP2-038]**. This explains in more detail how the Scheme has been refined through the design development process so as to be sympathetic to its setting and communities.
REP2-107	Design	This Scheme would ride roughshod over the design	The Applicant's answer to Q1.0.4 of the Applicant's Response to the First Written Questions **[REP2-037]** explains how the design of the Scheme

Parties reference	Theme	Summary of issue raised	Applicant's response
		principles for national infrastructure, as set by the National Infrastructure Commission.	meets the design principles for national infrastructure, as set by the National Infrastructure Commission.
REP2-117	Design	The Scheme design shows a disturbing lack of consideration for the welfare of the local community.	The design of the Scheme has been shaped by detailed studies of the character of the landscape and settlements and engagement with stakeholders including through community consultation. As a result of the design approach taken by the Applicant, the design of the Scheme incorporates offsets from solar farm structures to settlement edges, existing vegetation, including hedgerows, public rights of way and road networks. The design of the Scheme also conserves field patterns, ecology and historical features (including below ground archaeology) across the Order limits, including pine lines. This approach preserves the sense of identity of the landscape. The Design and Access Statement **[APP-264]** describes how the Applicant's approach to the development of the design of the Scheme has been sensitive to place and local character. The Applicant has prepared a Technical Note on Settlement Design Iteration as Appendix A to the Applicant's Response to the First Written Questions **[REP2-038]**. This explains in more detail how the Scheme has been refined through the design development process so as to be sympathetic to its setting and communities.
REP2-119	Location	It is my understanding that the solar panels would be situated within inches of private residences and back gardens, using every available green space.	This is an incorrect understanding.
REP2-121, REP2-210	Location	The location of the Scheme is unsuitable as it is too close to designated ecologically and culturally significant sites.	With the mitigation proposed, the ES demonstrates that the Scheme will not have any 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 is however acknowledged that Scheme will result in

Parties reference	Theme	Summary of issue raised	Applicant's response
			residual significant adverse effects upon landscape and visual receptors and heritage assets. 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. The analysis of the Scheme's compliance with the relevant national planning policy heritage tests identifies that residual significant adverse effects are expected upon three designated heritage assets; two scheduled monuments and one grade II registered park and garden; during the stages of the Scheme's lifetime. The impacts on these assets have been determined to have less than substantial harm. This less than substantial harm is to the setting of these assets with no direct adverse physical impacts resulting from the Scheme. There will also be no permanent loss of the significance of these designated assets allowing future generations to retain an understanding of their settings because the Scheme is proposed to be operational for 40 years, with its decommissioning secured through a DCO requirement. The proposed mitigation strategy minimises the harm to their settings and the Scheme provides a benefit to one scheduled monument by removing it from agricultural use and therefore potential future plough damage. The time limited and reversible loss of significance to the setting of a small number of designated assets is therefore considered to be justified and outweighed by the benefits of the Scheme. Mitigation for residual significant adverse effects upon below ground archaeology is to be implemented where possible by firstly avoidance of these areas in the detailed design process and then a programme of fieldwork and recording where necessary. 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

Parties reference	Theme	Summary of issue raised	Applicant's response
			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.
REP2-121	Location	The ASIs served to confirm my view of the total inappropriateness – without exception – of the location of the Solar Arrays, Inverters, Solar Stations and cabling proposed for W01 and W02.	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.
REP2-097, REP2-124, REP2-128, REP2-147, REP2-215, REP2-253A,	Location	The Scheme's siting means that it will separate and isolate communities.	The Scheme will not separate communities or the ability to move between them. No roads or public rights of way will be closed by the Scheme, except for very short durations during the construction period. These will be minimised and appropriately managed.
REP2-236	Location	The Scheme will remove the historic boundaries between settlements and effectively join them together and remove them from their setting.	The Applicant has prepared a Technical Note on Settlement Design Iteration as Appendix A to the Applicant's Response to the First Written Questions **[REP2-038]**. This explains in more detail how the Scheme has been refined through the design development process so as to be sympathetic to its setting and communities.
REP2-121, REP2-124, REP2-125, REP2-132, REP2-189, REP2-186, REP2-202, REP2-199, REP2-198, REP2-210	Location	The linked sites would surround all of the neighbouring villages.	The Applicant has prepared a Technical Note on Settlement Design Iteration as Appendix A to the Applicant's Response to the First Written Questions **[REP2-038]**. This explains in more detail how the Scheme has been refined through the design development process so as to be sympathetic to its setting and communities.
REP2-218	Location	The Scheme is located within a rural and beautiful Fenland landscape.	The design of the Scheme has been shaped by detailed studies of the character of the landscape and settlements and engagement with stakeholders including through community consultation. As a result of the design approach taken by the Applicant, the design of the Scheme

Parties reference	Theme	Summary of issue raised	Applicant's response
			incorporates offsets from solar farm structures to settlement edges, existing vegetation, including hedgerows, public rights of way and road networks. The design of the Scheme also conserves field patterns, ecology and historical features (including below ground archaeology) across the Order limits, including pine lines. This approach preserves the sense of identity of the landscape. The Design and Access Statement **[APP-264]** describes how the Applicant's approach to the development of the design of the Scheme has been sensitive to place and local character.
REP2-231, REP2-258	Scale	The scale of the Scheme should be reduced.	The size and shape of the Scheme is necessary in order to deliver the scale of renewable energy generation benefit that the Scheme will provide. Further detail is provided in the Statement of Need **[APP-260]**. The design of the Scheme has been shaped by detailed studies of the character of the landscape and settlements and engagement with stakeholders including through community consultation. As a result of the design approach taken by the Applicant, the design of the Scheme incorporates offsets from solar farm structures to settlement edges, existing vegetation, including hedgerows, public rights of way and road networks. The design of the Scheme also conserves field patterns, ecology and historical features (including below ground archaeology) across the Order limits, including pine lines. This approach preserves the sense of identity of the landscape. The Design and Access Statement **[APP-264]** describes how the Applicant's approach to the development of the design of the Scheme has been sensitive to place and local character.
REP2-166	Technology	Adopting a fixed timescale for development does not allow the Scheme to take advantage of improvements in technology.	Solar PV and battery energy storage technology is rapidly evolving. In preparing its design for the Scheme, the Applicant has made provision for technological innovation and improvement that may be realised at the time of procurement and construction so that it can select products that may not have been brought to market yet. However, since future innovations cannot be predicted or guaranteed, the Applicant also needs to ensure the Scheme is deliverable using existing proven technology.

5.6 Theme 6 – Planning

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-098A, REP2-100, REP2-102, REP2-147, REP2-253A	BESS	The BESS is not an associated development and should be a separate application.	The Applicant's Response to the First Written Questions – Appendix B **[REP2-038]**, which was published after this Written Representation, provides additional information in support of the Applicant's position that the BESS is Associated Development to the Solar PV development.
REP2-098A	Applicant	The Applicant has a track record in not meeting deadlines, showing a lack of experience in presenting an NSIP.	The Applicant respectfully disagrees. In any event, this is not considered to be important and relevant to determining this application.
REP2-208, REP2-243	Applicant	The Applicant does not have the experience to bring forward a project of this scale, which the Applicant has admitted is a learning curve.	The Applicant is Sunnica Limited, a joint venture between Tribus Clean Energy Limited and PS Renewables, two established solar energy companies.
REP2-243	Applicant	The directors of Sunnica Ltd have multiple other companies and therefore have other interests.	On 11 November 2020, Ofgem granted Sunnica Limited a licence to generate electricity under section 6(1)(a) of the Electricity Act 1989. As such, the Applicant is a statutory undertaker. Any other interests that may be held by directors of Sunnica Ltd are not considered to be important and relevant to determining this application.
REP2-098A, REP2-102, REP2-258,	Rochdale Envelope	Do not believe in using the Rochdale Envelope and specific information about the Scheme e.g., number of solar panels should be given before consent is granted.	As is common when development consent is sought for an NSIP, the Applicant has not undertaken detailed design for all elements of the Scheme. It has therefore applied the Rochdale Envelope approach and it has defined limits of deviation within which the subsequent development would be constructed. The detailed design of the Scheme within these limits of deviation would be carried out after development consent is granted. This has allowed the potential impacts of the Scheme to be assessed with appropriate design mitigation proposed whilst allowing flexibility for future detailed design development. The parameters that have been assessed are defined in Chapter 3 of the ES **[REP2-022]**.

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-102	Rochdale Envelope	The Applicant has carried out an EIA using a worst case following the Rochdale Envelope, but the assumptions made have not being provided.	As is common when development consent is sought for an NSIP, the Applicant has not undertaken detailed design for all elements of the Scheme. It has therefore applied the Rochdale Envelope approach and it has defined limits of deviation within which the subsequent development would be constructed. The detailed design of the Scheme within these limits of deviation would be carried out after development consent is granted. This has allowed the potential impacts of the Scheme to be assessed with appropriate design mitigation proposed whilst allowing flexibility for future detailed design development. The parameters that have been assessed are defined in Chapter 3 of the ES **[REP2-022]**.
REP2-105	Rationale	The Applicant has quite clearly made the Scheme as big as it is to avoid decision making on a local level where scrutiny is highest.	This is not correct. Under the Planning Act 2008 all onshore electricity generating schemes in England with a generation capacity of more than 50MW are required to seek consent via the Development Consent Order (DCO) process.
REP2-102	Planning balance	The Applicant should give little weight to the Scheme being temporary as it is likely it will not be decommissioned/the land will not be able to revert to its former use.	This is not correct. Decommissioning of the authorised development will be undertaken pursuant to the approved Decommissioning Environmental Management Plan (DEMP), which must be approved prior to decommissioning under Requirement 22 of the draft DCO. The DEMP must be substantially in accordance with the Framework DEMP that has been submitted with the DCO Application in Appendix 16E of the Environmental Statement **[APP-125]**. The DEMP will enable the land, once decommissioned, to be returned to the landowner to use for agriculture (subject to areas of landscape and ecological mitigation). The requirement to decommission the Scheme is enforceable against the undertaker with the benefit of the Order, and breach of the requirements is a criminal offence.
REP2-121, REP2-210, REP2-243	Policy	The Applicant has publicly acknowledged it is exploiting the requirements of an NSIP to ensure local level decision making is bypassed.	This is not correct. Under the Planning Act 2008 all onshore electricity generating schemes in England with a generation capacity of more than 50MW are required to seek consent via the DCO process.

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-253A	General	The Scheme does not accord with government, National Infrastructure and local development plan policy.	The Planning Statement sets out the Applicant's consideration of the planning balance in respect of the Scheme in sections 6 and 7 of the Planning Statement **[APP-261]**. The following sets out and summarises the conclusion of that document. The Energy NPSs, Draft Energy NPSs, and other national energy policy sets out the Government's aims to provide secure and affordable energy supplies whilst decarbonising the energy system. This is in order to enable the UK to achieve its legally binding commitment to reduce carbon emissions and achieve net zero carbon emissions by 2050; as well as provide a resilient and low cost energy network for the future. The Government recognises in policy that the need to deliver these aims and commitments is immediate and therefore renewable energy NSIPs, including large scale solar projects, need to be delivered urgently. The Scheme will deliver these policy aims, providing a significant amount of low carbon electricity over its lifetime; and providing resilience, security and affordability of supplies due to its large scale and proposed integration of BESS. It will therefore be a critical part of the national portfolio of renewable energy generation that is required to decarbonise its energy supply quickly whilst providing security and affordability to the energy supply. It is clear that there is a compelling case for the need for the Scheme and that it will deliver national economic and social benefits in line with the Government's wider objectives of delivering sustainable development. The analysis of planning policy compliance demonstrates that the need for the Scheme is supported by planning policy and other national energy and environmental policy, and that the Scheme addresses relevant national and local planning policies through its design, avoiding sensitive areas and limiting adverse impacts where possible. With the mitigation proposed, the ES demonstrates that the Scheme will not have any 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 is however acknowledged that Scheme will result in

Parties reference	Theme	Summary of issue raised	Applicant's response
			residual significant adverse effects upon landscape and visual receptors and heritage assets. 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. The analysis of the Scheme's compliance with the relevant national planning policy heritage tests identifies that residual significant adverse effects are expected upon three designated heritage assets; two scheduled monuments and one grade II registered park and garden; during the stages of the Scheme's lifetime. The impacts on these assets have been determined to have less than substantial harm. This less than substantial harm is to the setting of these assets with no direct adverse physical impacts resulting from the Scheme. There will also be no permanent loss of the significance of these designated assets allowing future generations to retain an understanding of their settings because the Scheme is proposed to be operational for 40 years, with its decommissioning secured through a DCO requirement. The proposed mitigation strategy minimises the harm to their settings and the Scheme provides a benefit to one scheduled monument by removing it from agricultural use and therefore potential future plough damage. The time limited and reversible loss of significance to the setting of a small number of designated assets is therefore considered to be justified and outweighed by the benefits of the Scheme. Mitigation for residual significant adverse effects upon below ground archaeology is to be implemented where possible by firstly avoidance of these areas in the detailed design process and then a programme of fieldwork and recording where necessary. 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

Parties reference	Theme	Summary of issue raised	Applicant's response
			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.
REP2-120	Policy	The Scheme does not satisfy the criteria of the NPPF (paras 148, 151, 142).	Paragraphs 148, 151 and 142 of the NPPF concern the Green Belt. These have no relevance to the Scheme. The Scheme is not located in the Green Belt.
REP2-120	Policy	This proposal is not consistent with Policy ENV 6 of the East Cambridgeshire Local Plan 2015.	The Planning Statement sets out the Applicant's consideration of the planning balance in respect of the Scheme in sections 6 and 7 and in Appendix B of the Planning Statement **[APP-261]**. The Applicant considers that the Scheme accords with Policy ENV 6 of the East Cambridgeshire Local Plan 2015 since its impacts are acceptable when considered in the context of the contribution the Scheme will make to the delivery of secure, affordable and renewable electricity generation capacity.
REP2-196	Policy	Under existing planning policy guidelines best and most versatile land should be protected for arable production not covered by solar panels.	The Applicant has sought to avoid the use of best and most versatile (BMV) agricultural land in the Scheme. An assessment of the agricultural land classification of the Scheme is set out by the Agricultural Baseline Report **[APP-115]**. This identifies that 96% of the land within the Sites is poorer quality agricultural land, being (grades 3b, 4 and 5). 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. The Applicant considers the minimal amount of BMVL included within the Scheme to be justified in accordance with national policy.
REP2-225	Policy	Government policy should take a more scattered approach to the location and size of solar farms to allow them to better integrate into their environment.	Section 5 of the Planning Statement **[APP-261]** sets out the legislative and policy context of the Scheme. The Application is to be considered within this context. Changes to Government policy are beyond the scope of this Application.

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-226	Policy	Government policy should give greater protection to agricultural land which is being lost to development at a rate of 100,000 acres a year.	The Applicant has sought to avoid the use of best and most versatile (BMV) agricultural land in the Scheme. An assessment of the agricultural land classification of the Scheme is set out by the Agricultural Baseline Report **[APP-115]**. This identifies that 96% of the land within the Sites is poorer quality agricultural land, being (grades 3b, 4 and 5). 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. The Applicant considers the minimal amount of BMVL included within the Scheme to be justified in accordance with national policy. Changes to Government policy are beyond the scope of this Application.
REP2-097	Precedent	If accepted the Scheme would create a precedent that would make preventing other poor solar schemes very difficult in the future.	This is not correct. Each DCO or planning application is to be considered on its merits.
REP2-164, REP2-247	Policy	The Scheme contravenes Newmarket Neighbourhood Plan which forms part of the West Suffolk Local Plan.	The Planning Statement sets out the Applicant's consideration of the planning balance in respect of the Scheme in sections 6 and 7 and in Appendix B of the Planning Statement **[APP-261]**. This includes consideration of the relevant policies in the Newmarket Neighbourhood Plan.
REP2-258	Supply chain	A planning requirement should be placed on the Scheme to source at least 50% of the high-technology components (e.g. batteries and panels, not metal frames or cabling) from UK manufacturers.	The Applicant has submitted an Outline Skills and Supply Chain Management Plan **[REP2-035]**. Section 5.4 sets out how the Scheme could be shaped to maximise opportunities to local businesses.

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-147	Enforcement	The costs to local authorities of enforcing the DCO will be huge.	Applications for approval of submissions under Requirements for approval by local authorities will be subject to application fees.
REP2-166	Planning authority	Any renewal of the consent for the Scheme after 40 years should be referred to local planning authorities.	The DCO application seeks consent for a 40 year operational life of the Scheme, with decommissioning to follow. The requirement to decommission the Scheme would be enforceable against undertaker with the benefit of the Order, and failure to comply with the Order would be a criminal offence. The hypothetical scenario raised is not about the Scheme and is not an important and relevant matter to consideration of the DCO application. Any change to the DCO (if made) to allow operation for a period longer than the 40 years would require an application to amend the DCO, and other interested parties and local planning authorities would have the ability to make representations.

5.7 Theme 7 – Alternatives

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-098A	Alternatives	The UK Government is focusing on green hydrogen and therefore the Scheme will soon be outdated.	Hydrogen fuel is useful for helping to decarbonise sections of the economy that are difficult to electrify. For example transport and heavy industry. However, the production of hydrogen fuel is an electricity-intensive process. In order to deliver green hydrogen, it is therefore essential that a zero carbon electricity grid is in place. This adds to, rather than conflicts with, the need for renewable energy schemes such as Sunnica. 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: *"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".*
REP2-097, REP2-108, REP2-113, REP2-119, REP2-120, REP2-125, REP2-134, REP2-169, REP2-170, REP2-172, REP2-196, REP2-197, REP2-198, REP2-199, REP2-208, REP2-210, REP2-211, REP2-213, REP2-228, REP2-234, REP2-235, REP2-239, REP2-242, REP2-247, REP2-251	Alternatives	Other technologies that do not have to be sited on land should be invested in such as wave power and rooftop solar.	Whilst the Applicant is supportive of decentralised smaller scale solar developments, such as the installation of solar panels on warehouse rooftops, these would not negate the need for the Scheme and would not represent a reasonable alternative to the Scheme. Draft NPS EN-1 paragraph 3.3.13 acknowledges the role that decentralised and community energy systems can play in helping to reduce carbon emissions and achieve energy security. However, it goes on to explain that this alone will not be sufficient to meet the need for renewable energy generation. It states that *"the government does not believe they* [decentralised and community energy systems] *will replace the need for new large-scale electricity infrastructure to meet our energy objectives"*. Paragraph 3.3.14 of Draft NPS EN-1 goes on to set out that large-scale centralised electricity generating facilities have numerous economic and other benefits, including the more efficient bulk transfer of power, which enables surplus generation capacity in one area to be used to cover shortfalls elsewhere.

Parties reference	Theme	Summary of issue raised	Applicant's response
			In addition, as set out by the Statement of Need [APP-260], a range of renewable electricity generation technologies will need to come forward if commitments for a zero carbon electricity system are to be achieved. 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: *"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".*
REP2-146, REP2-199, REP2-201	Alternatives	Wind farms should be the focus for meeting the UK's energy needs.	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 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).

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-098A, REP2-118, REP2-121, REP2-124, REP2-125, REP2-134, REP2-146, REP2-157, REP2-164, REP2-169, REP2-199, REP2-201, REP2-208, REP2-210, REP2-247, REP2-194	Alternatives	The Scheme should be on previously developed land.	The Applicant considered alternative locations, including previously developed land it has identified and that were raised by stakeholders at non-statutory and statutory consultations, as explained by paragraph 3.2.6 and listed at Table 3-1 of the Alternative Sites Assessment [**APP-054**]. The Applicant has not identified a suitable previously developed site.
REP2-120	Alternatives	There is little evidence that alternative methods of providing the same levels of renewable energy or alternative, more sustainable, locations have been looked at meaningfully by the applicant.	ES Chapter 4 [**APP-036**] and the Alternative Sites Assessment [**APP-054**] provide information on the main alternatives considered by the Applicant and the reasons for the Applicant's decision. The Statement of Need [APP-260] sets out why large scale solar schemes are needed.
REP2-124	Alternatives	New more efficient technologies are already being developed, making solar generation uneconomical.	Section 9 of the Statement of Need [**APP-260**] discusses the efficiency of large scale solar. It explains that Solar power is economically attractive in GB against many other forms of conventional and renewable generation. 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: *"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".*
REP2-098A, REP2-102, REP2-118, REP2-124, REP2-	Site selection	The Applicant has provided no evidence that it has seriously considered alternative sites.	ES Chapter 4 [**APP-036**] and the Alternative Sites Assessment [**APP-054**] provide information on the main alternatives considered by the Applicant and the reasons for the Applicant's decision.

Parties reference	Theme	Summary of issue raised	Applicant's response
208, REP2-247, REP2-253A			
REP2-097, REP2-098A, REP2-132, REP2-208, REP2-247	Site selection	The area of search was driven by costs/scheme viability rather than environmental effects.	Paragraph 2.4.4 of the Alternative Sites Assessment [**APP-054**] sets out the environmental and planning considerations that were considered as part of the site selection process.
REP2-199	Site selection	Difficult to understand why this remote rural site was chosen.	ES Chapter 4 [**APP-036**] and the Alternative Sites Assessment [**APP-054**] provide information on the main alternatives considered by the Applicant and the reasons for the Applicant's decision.
REP2-208	Site selection	Solar is seen as a quick and cheap, clean alternative and, to a degree, this is true, however this argument only holds good if the site is well chosen.	ES Chapter 4 [**APP-036**] and the Alternative Sites Assessment [**APP-054**] provide information on the main alternatives considered by the Applicant and the reasons for the Applicant's decision.
REP2-097, REP2-102, REP2-208	Site selection	The alternative site assessment has clearly reverse engineered a pre-determined outcome.	The purpose of Applicant's site selection process and the information presented by ES Chapter 4, Alternatives and Design Evolution [**APP-036**] and ES Appendix 4A, Alternative Sites Assessment [**APP-054**] was to identify a suitable site for the Scheme and to explain the options considered and the reasons for the Applicant's decision.
REP2-118	Alternative sites	When the Scheme was first proposed 2019 there were other sites around Burwell where the Scheme could have been located that would not rely on CPO powers.	ES Chapter 4 [**APP-036**] and the Alternative Sites Assessment [**APP-054]** provide information on the main alternatives considered by the Applicant and the reasons for the Applicant's decision.
REP2-098A, REP2-166	Alternative sites	There are currently 14 solar farms operational or in the planning process within 15km of Burwell substation which proves alternative sites were available.	ES Chapter 4 [**APP-036**] and the Alternative Sites Assessment [**APP-054**] provide information on the main alternatives considered by the Applicant and the reasons for the Applicant's decision.

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-134, REP2-194	Alternative use	If the current land must be changed, it should be changed into something that benefits biodiversity such a nature reserve, or something that could be a carbon sink.	The Scheme will deliver a biodiversity net gain and will save a substantial quantity of carbon emissions, compared to the projected grid energy mix. 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 technical note will be produced and issued during the Examination process providing the detail for the calculations using the latest BNG metric 3.1. The lifecycle greenhouse gas 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. This shows that the Scheme would result in a substantial saving in lifetime carbon emissions compared with the projected grid energy mix.
REP2-209	Alternative sites	There are better locations for a Scheme of this size that wouldn't have such significant impacts environmental, aesthetically and to people's health.	The purpose of the Applicant's site selection process was to identify a suitable site. As demonstrated by the analysis of the Scheme's compliance with important and relevant matters and specific policy planning tests in the Planning Statement [**APP-261**], the Applicant has achieved this objective. NPS EN-1 and draft NPS EN-1 both set out that there is no policy requirement for the Applicant to demonstrate that it has selected the 'best' site, the least impactful site or that alternative sites would/could not also be suitable. Paragraph 4.2.13 of Draft NPS EN-1 states that the presence of a lower impact alternative site would not be a reason to refuse Development Consent, stating: *"the SoS should not refuse an application for development on one site simply because fewer adverse impacts would result from developing similar infrastructure on another suitable site."*
REP2-247	Site selection	The site selection process was flawed because the landscape	There is no standard approach to an alternative site assessment. The Alternative Sites Assessment [**APP-054**] is proportionate and is sufficient to

Parties reference	Theme	Summary of issue raised	Applicant's response
		and visual criteria were inadequate.	explain the Applicant's reasons for selecting the Sites to describe the alternatives that it has considered.
REP2-247	Site selection	The site selection process was flawed because aspects such as Green Infrastructure were ignored - the location of Sunnica West Site A is within the Chippenham Fen GI Strategic Area.	There is no standard approach to an alternative site assessment. The Alternative Sites Assessment [**APP-054**] is proportionate and is sufficient to explain the Applicant's reasons for selecting the Sites to describe the alternatives that it has considered. The Green Infrastructure (GI) Strategic Area is identified by Figure 10-9 [APP-199] of the ES and impacts of the Scheme on green infrastructure are assessed by the ES including by Chapter 10, Landscape and Visual Amenity [APP-042]. The Landscape and Ecology Management Plan [APP-011] sets out proposals to protect and enhance green infrastructure. Given the ability for solar farms to retain and enhance green infrastructure, GI Strategic Areas are not considered as a criterion of the Alternative Sites Assessment [**APP-054**] in their own right. Elements of green infrastructure are considered within the Landscape and Visual, and Land Use criteria.
REP2-247	Site selection	The site selection process was flawed because the fragmented and dispersed nature of the development and the extensive area that it covers, was assessed as a single site. There was no consideration of the cumulative impacts of the development, which is a uniquely harmful aspect of this proposal.	Paragraph 2.4.4 of the Alternative Sites Assessment [**APP-054**] sets out that the Applicant sought either an individual site or a network of sites in close proximity for the Scheme. The Applicant has included an assessment of effect interactions (or intra-project cumulative effects) of the four sites and grid connection route of the Scheme within each of the technical chapters (6 to 16) of the Environmental Statement [**APP-038** to **APP-048**].

5.8 Theme 8 – Environment – General EIA

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-121	Impact	The impacts and consequences of the Scheme during construction, operation, decommissioning and post-operation – are complete unknowns, there being no precedent for a scheme of this size either in the UK.	An Environmental Impact Assessment has been undertaken in accordance with prescribed guidance and in line with the applicable legislation for development consent orders. This process has been defined to be applicable to a number of different projects at varying scales. The output of that process is the Environmental Statement (ES), which defines the potential environmental effects of the Scheme and the proposed mitigation to avoid or reduce potential effects. The construction, operational and decommissioning phases for the Scheme have been assessed for all environmental topics scoped into the Environmental Impact Assessment (Chapters 6 to 16 of the Environmental Statement **[APP-038 to APP-048]**), and a summary of environmental impacts is provided in Chapter 18: Summary of Environmental Effects **[APP-050]**). With the mitigation proposed, the ES demonstrates that the Scheme will not have any 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 is however acknowledged that Scheme will result in residual significant adverse effects upon landscape and visual receptors and heritage assets.
REP2-243	Information	The Application provides insufficient detail on the solar panels, including efficiency, design, quality assurance, source, manufacturer, maintenance, toxins, recycling, risk analysis and environmental protection.	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 does not typically taken place at the point in the development process that a DCO application is made – as is the case for Sunnica. Flexibility is retained for the detailed design, however this is balanced against assessing the environmental impact of a project against known parameters. Details on the technology to be used 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

Parties reference	Theme	Summary of issue raised	Applicant's response
			the draft DCO **[REP2-012]** and supporting Works Plans **[REP2-006]** propose a degree of flexibility to allow the latest technology to be utilised at the time of construction. As is established practice, the Applicant assessed the Scheme's impact according to the 'Rochdale Envelope' approach 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 standard practice that detailed design only be finalised prior to commencement of construction. Finalisation of the detailed design will be secured by Requirement in the draft DCO [**REP2-012**], and will require approval by the relevant planning authority in accordance with documents submitted as part of the DCO Application. This includes the design principles which sets out the parameters against which the environmental effects of the projects have been assessed. 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 developments will likely bring improvements in the operating efficiency and generating potential of the Scheme. The Applicant has submitted a Framework Construction Environmental Management Plan (CEMP), Framework Operational Environmental Management Plan (OEMP), and Framework Decommissioning Environmental Management Plan (DEMP), which include measures to manage and mitigate environmental impacts and to protect the environment. Pursuant to the relevant Requirements in the draft DCO [**REP2-012**], the appointed contractor will be required to prepare detailed management plans (CEMP, OEMP and DEMP) for approval prior to the commencement of construction, operation and decommissioning.
REP2-243, REP2-098A, REP2-102, REP2-156	Information	There are still so many unknowns, including, the number of solar panels, BESS design and layout, number of	Please see response to REP2-243 above regarding detailed design and the Rochdale Envelope approach.

Parties reference	Theme	Summary of issue raised	Applicant's response
		houses the farm can supply energy to.	
REP2-243	Management	Who is responsible for the upkeep, health and safety and general maintenance of the Scheme?	For the construction phase, the Applicant will appoint a principal contractor who will be responsible for constructing the Scheme in accordance with the environmental controls documented in the Framework CEMP **[REP3-015]**, which are to be given effect through the detailed CEMP prepared in accordance with Requirement 14 of the draft DCO **[REP2-012]**. During operation, the Applicant will appoint an Operational and Maintenance Company to operate the Scheme, who will be responsible for working in accordance with the environmental controls documented in the Framework OEMP **[REP2-030]**, which are to be given effect through the detailed OEMP in accordance with Requirement 15 of the draft DCO. However, as undertaker the Applicant is ultimately responsible for compliance with the Requirements of the DCO.
REP2-098A, REP2-101, REP2-136	Procurement	There is a risk that parts used in the Scheme will be sourced from China and made with slave labour.	The Applicant intends that the construction, operation and decommissioning of the Scheme will be undertaken pursuant to an ethical procurement policy and that this is a legal obligation on anyone who has the powers under the DCO. That would be achieved by securing the Skills, Supply Chain and Employment Plan by a requirement of the DCO (currently Requirement 20). The Applicant proposes the following ethical procurement policy and has updated the outline Skills, Supply Chain and Employment Plan **[REP2-034]** accordingly: • any potential supplier must complete a modern slavery supplier due diligence questionnaire as part of the tender exercise; • any potential supplier must meet the statutory requirements under the Modern Slavery Act 2015 to prepare a modern slavery statement;

Parties reference	Theme	Summary of issue raised	Applicant's response
			• any potential supplier must have a modern slavery policy; • any potential supplier must provide relevant employees with modern slavery training; • any contract to be entered into with a potential supplier must include the following warranties: o the supplier has not been and is not engaged in any form of slavery; o the supplier pays its workers in compliance with applicable employment laws and minimum wage requirements; o the supplier will take reasonable steps to prevent slavery and human trafficking in connection with its business; • any contract to be entered into with a potential supplier must include: • a right of audit; and • a right of immediate termination in the event of any instances of slavery and human trafficking connected to the supplier.
REP2-147, REP2-201	Procurement	There is a risk that components of the Scheme could be made by people working in poor condition.	See response to REP2-098A, REP2-101, REP2-136 above regarding the inclusion of an ethical procurement policy in the outline Skills, Supply Chain and Employment Plan.
REP2-228	Procurement	BESS is reliant on technology provided by a potentially hostile foreign government.	The Scheme has not finalised its procurement process at this stage and no equipment has been purchased. There are a significant number of suppliers across the world who have developed and manufacture BESS technology. As set out above in the response to REP2-098A, REP2-101 and REP2-136 above, the Applicant has updated the Outline Skills, Supply Chain and Employment Plan to include an ethical procurement policy.
REP2-214	Procurement	45% of world supply of solar grade polysilicon used in the	See response to REP2-098A, REP2-101, REP2-136 above.

Parties reference	Theme	Summary of issue raised	Applicant's response
		manufacture of solar panels comes from Xinjiang Province where Muslim Uyghars are used as forced, slave labour in the manufacture. A further 30% comes from elsewhere In China. China dominates the market with a 75% share, and uses slave labour, in contravention of the Modern Day Slavery Act of 2015.	
REP2-097, REP2-119, REP2-136, REP2-139, REP2-128, REP2-160, REP2-198, REP2-214	General	40 years is not a short-term project, it will affect generations.	The Applicant does not define the Scheme as short-term; however, it is a temporary scheme with a 40 year operational life. This is confirmed by the Draft NPS EN-3 which states: *'Such consent, where granted, is described as temporary because there is a finite period for which it exists, after which the project would cease to have consent and therefore must seek to extend the period of consent or be decommissioned and removed.'*
REP2-119	EIA	The Applicant does not give proper weight to environmental considerations such as landscape and visual impact, heritage and local amenity.	An Environmental Impact Assessment has been undertaken in accordance with prescribed guidance and in line with the applicable legislation. The output of the process is the Environmental Statement (ES), which defines the potential environmental effects of a Scheme and the proposed mitigation to avoid or reduce potential effects. The technical chapters within the ES **[APP-038 to APP-047]** have considered the potential effects of the Scheme during construction, operation and decommissioning. With the mitigation proposed, the ES demonstrates that the Scheme will not have any 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 is however acknowledged that Scheme will result in residual significant adverse effects upon landscape and visual receptors and heritage assets.

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-208	EIA	A proper risk assessment of all aspects of the proposal has not been forthcoming. These can be for items as simple as traffic accidents, industrial accidents or even battery explosion.	See response to REP2-119.
REP2-242	Scale	The environmental impacts of the Scheme are larger due to its large scale.	See response to REP2-119.
REP2-243	Assessment quality	The Applicant has paid for the environmental reports so they are biased.	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 Scheme have been adequately assessed, and that where possible, they have been avoided and/or mitigated.
REP2-120	CCTV	The use of CCTV in the manner being recommended by the police will be visually intrusive in this rural landscape and completely out of character with the surrounding countryside. It also represents a significant privacy intrusion and any such use must be in accordance with the GDPR and registered with the Information Commissioner.	The use of CCTV is required to ensure the safety and security of the Scheme and the local residents. These have been assessed within the Landscape and Visual Amenity **[APP-042]** as part of the operational phase. No significant residual effects are anticipated as a result of the Scheme, in relation to the CCTV cameras. The CCTV cameras will be installed and operated in accordance with GDPR.

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-213	Ownership	Concern the Scheme will be sold off to someone who has little interest or empathy for the area other than to make money.	Should the Scheme be sold, the holder of the DCO consent will be obliged to implement all mitigation measures outlined within the Environmental Statement and the Framework CEMP **[REP3-015],** Framework OEMP **[RE2-030]** and Framework DEMP **[REP2-028]**. In addition, the operator will be required to adhere to all commitments and Requirements set out by the DCO consent. The requirements of the DCO are enforceable against the person with the benefit of the Order, and failure to comply is a criminal offence.

5.9 Theme 9 – Environment – Climate

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-097, REP2-099, REP2-102, REP2-103, REP2-104, REP2-105, REP2-116, REP2-117, REP2-121, REP2-134, REP2-135, REP2-136, REP2-140, REP2-147, REP2-162, REP2-167, REP2-171, REP2-172, REP2-182, REP2-192, REP2-196, REP2-213, REP2-202, REP2-229, REP2-235, REP2-198, REP2-196, REP2-214, REP2-242, REP2-253A	Carbon	The Scheme is not carbon neutral.	Chapter 6: Climate Change of the Environmental Statement **[APP-038]** presents a lifecycle GHG assessment for the Scheme. Paragraph 6.8.31 of Chapter 6: Climate Change **[APP-038]** concludes that the "*adverse effect from operational emissions associated with the Scheme is far outweighed by the beneficial impact of the Scheme as a result of renewable energy generation. The GHG variation between the Scheme and projected grid average generation achieved throughout the assessed lifetime of the Scheme demonstrates the role solar energy generation has to play in the transition to, and longer-term maintenance of, a low carbon economy. Without low-carbon energy generation projects such as the Scheme, the average grid GHG intensity will not decrease as is projected, which could adversely affect the UK's ability to meet its carbon reduction targets.*" Paragraphs 6.8.40 to 6.8.45 of Chapter 6: Climate Change **[APP-038]** present the significance of overall effect for the Scheme when considering all phases of development, stating that "*the operational GHG intensity of the Scheme is considerably lower than the current grid energy mix, and remains well below to projected grid average over the lifetime of the Scheme*" and that "*the beneficial impact of the Scheme during operation in relation to the UK meeting its carbon reduction targets is considered to be of high magnitude, and therefore represents a major beneficial effect on the climate*." Based on the difference between the operational GHG intensity of the Scheme and the projected grid GHG intensity during operation, it is estimated that an additional 957,334 tCO_2e would be emitted to generate the equivalent amount of electricity over the operational lifetime of the Scheme from the projected grid energy mix compared to the Scheme. Also, the lifetime GHG intensity of the Scheme compares favourably with fossil fuel electricity generation and is comparable with other low carbon energy generation types. This demonstrates the role solar energy generation has to play in the transition to a low carbon economy in line with the UK's net zero 2050 target.

Parties reference	Theme	Summary of issue raised	Applicant's response
			The Applicant is aware that Cranfield University has prepared a report on carbon emissions associated with the Scheme, which will be responded to separately.
REP2-099, REP2-101, REP2-102, REP2-104, REP2-182, REP2-192, REP2-249, REP2-253A	Transport	Components of the Scheme will be manufactured abroad which will increase carbon emissions transporting them to the UK.	GHG emissions associated with transportation of components from abroad (including Europe, China and South Korea, as appropriate) are included in the total GHG impacts of the Scheme as calculated in the Lifecycle GHG Assessment presented in Chapter 6: Climate Change of the Environmental Statement **[APP-038]**. Chapter 6: Climate Change **[APP-038]** concludes that "*the GHG reductions achieved as a result of the Scheme itself adequately outweigh and offset the GHG impacts during the individual lifecycle stages*" and that "*the beneficial impact of the Scheme during operation in relation to the UK meeting its carbon reduction targets is considered to be of high magnitude, and therefore represents a major beneficial effect on the climate*."
REP2-101, REP2-103, REP2-108, REP2-114, REP2-117, REP2-120, REP2-182, REP2-192, REP2-224, REP2-243, REP2-251	Transport	The loss of agricultural land as a result of the Scheme will increase carbon emissions due to the need to import more food from outside the UK.	It is not possible to know where alternative food will be sourced, so it is not possible to quantify any potential GHG impacts of changes to food imports and exports as a result of the Scheme. However, it is noted that sheep farming for lamb meat and honey farming can be co-located with solar PV energy generation. These activities contribute to food production. The Energy NPSs, Draft Energy NPSs, and other national energy policy documents set out the Government's aims to provide secure and affordable energy supplies whilst decarbonising the national energy system. This is to enable the UK to achieve its legally binding commitment to reduce carbon emissions and achieve net zero carbon emissions by 2050; as well as provide a resilient and low-cost energy network for the future. The Government recognises in policy that the need to deliver these aims and commitments is immediate and therefore renewable energy NSIPs, including large scale solar projects, need to be delivered urgently. Weighing up impacts on food production against the benefits of renewable energy generation to determine the most appropriate use of land in the UK is a matter for Government Policy.

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-222	Transport	Construction traffic will create carbon emissions which will contribute to climate change.	GHG emissions associated with transportation of components (including from abroad, as appropriate), transportation of workers to and from site, waste disposal, and emissions from plant fuel use, are all included in the total GHG impacts of the Scheme as calculated in the Lifecycle GHG Assessment presented in Chapter 6: Climate Change of the Environmental Statement **[APP-038]**. Chapter 6: Climate Change **[APP-038]** concludes that "*the GHG reductions achieved as a result of the Scheme itself adequately outweigh and offset the GHG impacts during the individual lifecycle stages*" and that "*the beneficial impact of the Scheme during operation in relation to the UK meeting its carbon reduction targets is considered to be of high magnitude, and therefore represents a major beneficial effect on the climate*." As outlined in the Climate Change Chapter of the Environmental Statement **[APP-038]** and in the Framework Construction Environmental Management Plan (CEMP) **[REP2-026]**, the following measures will be implemented to reduce fuel consumption and associated emissions: • The Considerate Constructors Scheme (CCS) will be adopted to assist in reducing pollution, including GHGs, from the Scheme by employing good industry practice measures which go beyond statutory compliance. Specific measures will be listed in the detailed CEMP. • The use of lower carbon modes of transport will be encouraged by identifying and communicating local bus connections and pedestrian and cycle access routes to/from the Scheme to all construction staff and providing appropriate facilities for the safe storage of cycles. Potential staff minibus and car sharing options will also be explored. • A Travel Plan will be implemented to reduce the volume of construction staff and employee trips to the Scheme.
REP2-104	Sentiment	Carbon Neutral Cambridge are opposing the Scheme.	The Applicant notes the position of Carbon Neutral Cambridge.

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-104, REP2-253A	Carbon	The components of the Scheme will all have to be replaced at least once, which will create a high level of emissions.	GHG emissions associated with replacement of components are included in the Lifecycle GHG Assessment presented in Chapter 6: Climate Change of the Environmental Statement **[APP-038]**. Chapter 6: Climate Change **[APP-038]** concludes that "*the GHG reductions achieved as a result of the Scheme itself adequately outweigh and offset the GHG impacts during the individual lifecycle stages*" and that "*the beneficial impact of the Scheme during operation in relation to the UK meeting its carbon reduction targets is considered to be of high magnitude, and therefore represents a major beneficial effect on the climate*."
REP2-196	Alternatives	We can alternatively achieve carbon neutrality through producing crops that can be burned for energy.	Please refer to the response provided to REP2-242 (in the 'Need' section of the Applicant's response).
REP2-119	Environment	Question how environmentally friendly burying cables and installing solar stations in rural areas is.	An Environmental Impact Assessment has been undertaken in accordance with prescribed guidance and in line with the applicable legislation. This process has been defined to be applicable to a number of different projects at varying scales. The output of the process is the Environmental Statement (ES) which defines the potential environmental effects of a Scheme and the proposed mitigation to avoid or reduce potential effects. With the mitigation proposed, the ES demonstrates that the Scheme will not have any 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 is however acknowledged that Scheme will result in residual significant adverse effects upon landscape and visual receptors and heritage assets.
REP2-120	CLA	Carbon lifecycle analysis, (CLA), should be used to prove that during their whole lifecycle;	Chapter 6: Climate Change of the Environmental Statement **[APP-038]** presents a lifecycle GHG assessment, which considers GHG emissions

Parties reference	Theme	Summary of issue raised	Applicant's response
		construction, operation, decommissioning and disposal/recycling; this installation will actually save more carbon emissions than it creates.	that would arise during construction, operation, and decommissioning. The GHGs considered in this assessment include: • Embodied carbon associated with the manufacture of components, including: o Solar PV modules (with embodied carbon emissions based on Environment Product Declaration data for PV panels produced in China) o Steel supports o Inverters, Transformers and Switchgear o Substations o BESS o Cabling • GHG emissions associated with transportation of workers and materials to the Sunnica site, including transportation of materials via HGV and sea freight from China and South Korea for the modules, BESS and BESS inverters, and from Europe for all other materials. • GHG emissions associated with construction activities (e.g. plant and machinery fuel use and water use on site). • GHG emissions associated with the disposal of waste during construction, based on conversative assumptions of the quantities recycled and quantities sent to landfill. • GHG emissions associated with maintenance during operation (including material replacement, transportation emissions and maintenance activities e.g. plant fuel use). • GHG emissions associated with the disposal of waste during decommissioning of the Scheme, based on conversative assumptions of the quantities recycled and quantities sent to landfill. • GHG emissions associated with decommissioning activities (e.g. plant fuel use). Further, the assessment calculates energy generation data, including efficiency losses of the PV modules over time. Ongoing repair and maintenance activities during operation of the Scheme will help to reduce such efficiency losses.

Parties reference	Theme	Summary of issue raised	Applicant's response
			Section 6.8 of Chapter 6: Climate Change **[APP-038]** presents the findings of the calculations for lifecycle GHG impacts. GHG emissions arising as a result of the Scheme are first identified and assessed for each individual lifecycle stage (construction, operation (including maintenance) and decommissioning), before then assessing the whole-life GHG impact of the Scheme. The operational phase takes into account both the 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. Paragraph 6.8.31 of Chapter 6: Climate Change **[APP-038]** concludes that the "*adverse effect from operational emissions associated with the Scheme is far outweighed by the beneficial impact of the Scheme as a result of renewable energy generation. The GHG variation between the Scheme and projected grid average generation achieved throughout the assessed lifetime of the Scheme demonstrates the role solar energy generation has to play in the transition to, and longer-term maintenance of, a low carbon economy. Without low-carbon energy generation projects such as the Scheme, the average grid GHG intensity will not decrease as is projected, which could adversely affect the UK's ability to meet its carbon reduction targets.*" Paragraphs 6.8.40 to 6.8.45 of Chapter 6: Climate Change **[APP-038]** present the significance of effect overall for the Scheme when considering all phases of development, stating that "*the operational GHG intensity of the Scheme is considerably lower than the current grid energy mix, and remains well below to projected grid average over the lifetime of the Scheme*" and that "*the beneficial impact of the Scheme during operation in relation to the UK meeting its carbon reduction targets is considered to be of high magnitude, and therefore represents a major beneficial effect on the climate*." Based on the difference between the operational GHG intensity of the Scheme and the projected grid GHG intensity during operation, it is estimated that an additional 957,334 tCO_2e would be emitted to generate

Parties reference	Theme	Summary of issue raised	Applicant's response
			the equivalent amount of electricity over the operational lifetime of the Scheme from the projected grid energy mix compared to the Scheme. Also, the lifetime GHG intensity of the Scheme compares favourably with fossil fuel electricity generation and is comparable with other low carbon energy generation types. This demonstrates the role solar energy generation has to play in the transition to a low carbon economy in line with the UK's net zero 2050 target.
REP2-164	Carbon	The Scheme is not sustainable due to the use of rare earth minerals in the solar cells and batteries.	At the time of running the procurement process, care will be taken when selecting suppliers that the equipment they propose to utilise will avoid unnecessary environmental damage. The requirement to consider criteria to minimise environmental damage within the procurement process will be included within the next iteration of the Outline Skills, Supply Chain and Employment Plan **[REP2-034]**. A decision on the end use of the panels will be taken prior to decommissioning. Should they still be productive there would be the option of resale or donation of panels to other end-users. Where resale or donation is not feasible, solar panels will be recycled in accordance with relevant legislative requirements and good practice at the time of decommissioning. A Framework Decommissioning Environmental Management Plan (DEMP) is provided with the application in Appendix 16E of the Environmental Statement **[REP2-028]**. The core waste management principles and the final DEMP must be substantially in accordance with the Framework DEMP. 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). It is expected that, where possible, the solar panels will be able to be readily recycled in the UK at that time (40 years ahead). Recycling solar PV infrastructure is an emerging industry as the current solar farms are reaching an age where they need to be decommissioned. The technology already exists in UK and Europe to recycle panels, and it is expected that recycling technology for solar equipment will be far more developed in the UK in over 40 years' time (when decommissioning is due to begin) than it currently is. At present, RecycleSolar is the only UK based solar panel recycling service, but more

Parties reference	Theme	Summary of issue raised	Applicant's response
			companies are expected to setup in the next decade as the current solar farms begin to be decommissioned. Technology removed prior to the end of the Scheme's operational life will also be recycled as far as possible and will undergo the same process as outlined above. Technology already exists in UK and Europe to recycle the mounts, panels, inverters, and other infrastructure on solar farms. Prevention, reuse, recycle, recover and disposal, as defined in the 'Waste Hierarchy', will be embedded within the DRMP, which is a requirement in the Framework DEMP (see paragraph 2.8 and Table 3-11). Pursuant to the draft DCO **[APP-016]**, the Applicant must submit the final DEMP to the local planning authorities prior to decommissioning.
REP2-235	Assessment	The Applicant has already deemed that some emissions are acceptable.	Chapter 6: Climate Change of the Environmental Statement **[APP-038]** concludes that "*the GHG reductions achieved as a result of the Scheme itself adequately outweigh and offset the GHG impacts during the individual lifecycle stages*" and that "*the beneficial impact of the Scheme during operation in relation to the UK meeting its carbon reduction targets is considered to be of high magnitude, and therefore represents a major beneficial effect on the climate*."
REP2-242	BESS	The safety measures required for the BESS will use energy, undermining the sustainability case for the Scheme.	GHG emissions associated with energy used for the operation of the Scheme are included in the Lifecycle GHG Assessment presented in Chapter 6: Climate Change of the Environmental Statement **[APP-038]**. Chapter 6: Climate Change **[APP-038]** concludes that "*the GHG reductions achieved as a result of the Scheme itself adequately outweigh and offset the GHG impacts during the individual lifecycle stages*".
REP2-238	Displacement	There will be additional emissions from people travelling further afield for recreation and to ride horses.	It is not possible to know the extent of any impact on this specific form of travel without understanding how far people travel currently (baseline scenario), and what the alternative scenario may look like. However, based on professional judgement when considering the magnitude of the beneficial impact of the Scheme, the impact of changes to local travel patterns for recreation is not expected to have a material impact on the outcome of the GHG assessment.

Parties reference	Theme	Summary of issue raised	Applicant's response
			In addition, decarbonisation of transportation emissions over time in line with Government's Transport Decarbonisation Policy will result in fewer emissions from recreational transportation over the lifetime of the Scheme. Increased uptake of electric, hybrid and more fuel-efficient vehicles is likely to reduce transportation emissions in the future.

5.10 Theme 10 – Environment – Built Heritage

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-098A, REP2-120, REP2-132, REP2-193, REP2-247, REP2-253A	Character and setting	The Scheme affects the area's character and the setting of numerous historic villages.	A detailed assessment of landscape character has considered the likely effects of the Scheme on the landscape at different scales. Consideration has also been made of the historic character of the area and the development of the settlements, some of which are designated as conservation areas. Most of the area around the settlements 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. It is acknowledged that the scale of the Scheme is large. The layout, across discrete sites, is intentional. The Scheme has been designed to avoid development within or directly on the boundaries of existing settlement, to avoid key views 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 therefore not likely.
REP2-102, REP2-110, REP2-194, REP2-247	Chippenham Park	It is apparent that the Applicant has underestimated the heritage impact of the scheme, including upon Chippenham Park.	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

Parties reference	Theme	Summary of issue raised	Applicant's response
			current guidance and best practice. Historic England has confirmed its acceptance of the conclusions. 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]**). 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.
REP2-104	Ark Church	The Ark Church was built sympathetically to embrace the natural landscape, but the solar panels from the Scheme will now face towards the church.	The Ark Church is not a heritage asset, but remains a prominent feature in the landscape. Paragraph 6.32 of GLVIA3 explains that susceptibility of different visual receptors to changes in views and visual amenity is mainly a function of the occupation or activity of people experiencing the view at particular locations and the extent to which their attention or interest may therefore be focused on the views and the visual amenity they experience at particular locations. The Ark is a venue for church services carried out within the building. Although there are views from windows on the eastern façade of the building towards the Scheme, these general relate to offices and ancillary uses, such as a kitchen. There is a community room at the northern end of the eastern side of the building. The external area adjacent is used for parking mini buses and houses a shipping container. People using this space are likely to be focused on the activities within the building. The land to the south of the church where VP4 is located, is a large surface level car park with limited amenity. People's views are therefore focused on their activity within the church and do not involve or depend upon

Parties reference	Theme	Summary of issue raised	Applicant's response
			appreciation of views of the landscape. The Applicant agrees with the Councils that the Ark is an important landmark in views across the landscape locally and is referred to where relevant in the assessment. With reference to Appendix 10H of the ES **[APP-107]**, the Applicant has assessed the magnitude of impact on views of visitors to the Ark as high in year 1 of operation. By year 15 of operation, planting along the eastern edges of parcel E05 would have established. This would screen the built elements of the Scheme but would also reduce the openness of the views to the east across the middle ground, with the magnitude of impact reduce to medium. The wooded skyline would remain and distant landmarks, such as St. Mary's Church Mildenhall and St. Andrew's Church Freckenham would not be affected.
REP2-117, REP2-128,	Isleham	Isleham derives much of its sense of place and character from the landscape, which will be destroyed by the Scheme.	The centre of Isleham is a designated conservation area in recognition of the survival of its historic core and its development as a rural settlement. It has undergone substantial urban expansion in the 20th century which has eroded the historic edge, but it remains rooted in rural surrounding. 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. The LVIA concludes that effects on LLCA 10 would be not significant in construction, operation and decommissioning [**APP-106**]. Effects on visual receptors associated with viewpoints 3, 4, 4a and 6 would be significant in construction and year 1 of operation, before planting carried out as mitigation will have established. However, by year 15 of operation, whilst some effects on views would remain, these would be not significant [**APP-107**]. Therefore, significant effects on the sense of place and place attachment of residents of settlements are not likely. Solar panels would be located approximately 500m from the south eastern corner of the village in parcel E05 of Sunnica East Site A, 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. The solar panel arrays have been sited away from Isleham to

Parties reference	Theme	Summary of issue raised	Applicant's response
			avoid the Scheme resulting in the physical coalescence of settlements. This assists in retaining the open character to the south of Beck Road, between Isleham and Freckenham, including the enhancement of the character and quality of the landscape through the introduction of ECO1 and ECO2, which are areas of proposed native grassland. Solar panels in parcel E05 have been offset from Beck Road via a landscape buffer of native grassland and woodland as illustrated in Section 2, presented in Figure 9 of the OLEMP [**REP3-011**]. This reduces the proximity of the panels to road users and retains views along the road corridor of churches in Isleham and Freckenham to retain the perception of travelling through the landscape that separates the settlements.. The proposed woodland planting, which has also been set back from the road, will provide a more vegetated setting to the southern part of the village, reflecting the pattern of woodland to the south of Isleham, adjacent to the B1104 (Station Road).
REP2-120	Assessment	We consider heritage assets assessed by the Applicant 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.
REP2-120	Assessment	The effect on the views from the Limekilns around to the south of Newmarket were not mentioned in the PEIR.	The impact on Newmarket has been assessed in Chapter 7: Cultural Heritage of the Environmental Statement **[APP-039]** in relation to the conservation area. Visual impacts more generally to the Limekilns were assessed in the LVIA chapter of the ES. 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

Parties reference	Theme	Summary of issue raised	Applicant's response
			Newmarket including the understanding of the importance of the racing industry to the evolution of the settlement and wider landscape.
REP2-120	Cambridge-Mildenhall railway	The route of the closed Cambridge-Mildenhall railway has been identified as a heritage asset.	The Cambridge to Mildenhall Railway (MSF35054, SUF 078) has been assessed in the Cultural Heritage Assessment in Chapter 7: Cultural Heritage of the Environmental Statement [APP-039 Paragraph 1.7.149]. The asset is considered to be of no more than very low value. While the alignment will be partially within the Grid Connection and could be at least partly impacted by the excavation of cable trenching, the magnitude of impact upon it is not considered to be more than very low. This results in a significance of effect of negligible.
REP2-221, REP2-194, REP2-247, REP2-249	Heritage	The Scheme threatens Newmarket's heritage as a centre for horseracing.	The Applicant has had regard to the Newmarket Conservation Area and the cultural heritage of the horseracing industry. 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. 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. It is acknowledged that the association of Newmarket with racing is historic and has been a significant factor in its development and the historic character of the settlement as a whole. The assessment has concluded that the horseracing industry would not be significantly affected by the Scheme and will be able to continue. The historic association with racing will therefore be maintained. Further consideration of this matter is set out in

Parties reference	Theme	Summary of issue raised	Applicant's response
			the Applicant's Deadline 2 submission: Horse Racing Industry Impact Assessment [**REP2-039**].
REP2-147, REP2-238	Construction	Construction will impact negatively on listed buildings and monuments within villages. The village roads are not designed for large HGVs.	A Framework Construction Traffic Management Plan and Travel Plan **[REP3-013]** 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.
REP2-149	Heritage impacts	The Scheme will impact negatively on the setting of the Spurgeon Stone.	The Spurgeon Stone is located on the banks of the River Lark and will, therefore, not be physically impacted by the Scheme. The stone marks the location of the baptism of C H Spurgeon, a notable Baptist preacher. As a marker stone for an event that took place within the waterway, its setting is linked to the river and does not extend into the site. The heritage significance of the stone will, therefore, not be affected.
REP2-236	Heritage	The U6006 (Badlingham Lane) forms part of the historic Icknield Way, a route with high significance as a heritage asset. Badlingham Lane needs to be acknowledged and protected as a heritage asset. The evidence for its antiquity is strong: Fox's work deduced it was of pre-Roman origin; modern	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. The small section of U6006 crossed by the cable route will revert to its original appearance following construction. The permanent access across U6006 between E12 and E13 will remain. 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.

Parties reference	Theme	Summary of issue raised	Applicant's response
		scholarship endorses this, concluding it was one of the three major routes of the Icknield Way. A Bronze Age founder's hoard discovered nearby adds another layer of evidence, as materials were often buried by peripatetic Bronze Age metal workers along the routes of ancient trackways. Its relative straightness and the proximity of a possible Roman river crossing at Badlingham suggests it may have been adopted by the Romans. It may have been a pilgrim route. The route is marked on Morden's 17C Cambridgeshire map reproduced in Camden's Britannia; it appears on Hodskinson's late 18C map as one of a number of paths crossing the heath but Freckenham Enclosure Map 1824 shows it as the only one remaining across the heath.	
REP2-236	Heritage	If works to the U6006 (Badlingham Lane) go ahead as outlined above, I fear we will be left with a sterile corridor, denuded of trees and hedgerows, enclosed by 2.1/2m high security fencing, crowded on either side by fields of solar panels. There is no hedgerow	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. The small section of U6006 crossed by the cable route will revert to its original appearance following construction. The permanent access across U6006 between E12 and E13 will remain. Additional planting is proposed in places along the route to reinforce habitat connectivity and visual screening of solar panels in adjacent fields, as

Parties reference	Theme	Summary of issue raised	Applicant's response
		restoration planned. The character of this well-used and much-loved historic asset, together with any underlying archaeology, will be lost forever. If the development goes ahead as planned, it will be a significant loss to the area. The nature and character of Badlingham Lane will be destroyed along with its long views and wildlife, and not just for the 24 months of construction. This could be avoided with a more considerate design where only one crossing point would be needed, at areas with already sparse tree cover. The suggested permissive paths are no substitute.	shown in the updated LEMP submitted at Deadline 3 [**REP3-011**], and the Environmental Masterplan **[REP3-022]** submitted at the same deadline.

5.11 Theme 11 – Environment – Archaeology

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-109, REP2-128, REP2-149, REP2-172 (and also raised in Isleham Parish Council's response to FWQ 1.4.13)	Isleham Plane Crash	The Scheme could potentially disturb the remains of the Isleham plane crash, as there is no proof that all human remains and bombs on board the plane were fully recovered. It would be disrespectful to build over this area which is seen as a significant event for the Parish. There is a feeling that the crash site should be recognised as an official archaeological site under the Ancient Monuments and Archaeological Areas Act 1979 Sunnica's proposals would sever the visual connection to RAF Mildenhall.	The Applicant has considered the position in respect of the interaction of the Scheme proposals with the site of the Isleham plane crash; and has provided an update to this in the 'Heritage and Substation Connection Update' document also submitted at Deadline 3A.
REP2-166, REP2-215	Construction impacts	Construction will involve excavations and soil movement over such a large area, it represents a threat to the heritage of the area. The Applicant cannot manage construction activities over such a large area.	The Applicant will be submitting a Detailed Archaeological Mitigation Strategy (DAMS) to the Examination in due course. The DAMS will be in accordance with a Joint Brief still to be issued by the County Council Historic Environment Teams and subject to agreement with Historic England. This strategy will incorporate the appropriate mitigation measures to ensure that impacts arising from soil movement account for impacts to heritage. In any event, the Applicant notes that the Scheme will not involve excavations and soil movements over a large area, given the limited depths of the infrastructure to be installed. Please also see the Applicant's Response to First Written Questions Q1.4.12 [REP2-037] and Relevant Representations CCC-7 and CCC-14 [REP1-016].
REP2-124	General	There is an unknown effect on buried archaeology, many important historical finds have been made in this area.	The Impact upon archaeological remains has been evaluated through a programme of geophysical survey and trial trenching and the effect of the development is assessed in the ES in Chapter 7. Mitigation measures for archaeology will be

Parties reference	Theme	Summary of issue raised	Applicant's response
			set out in the detailed archaeological mitigation strategy to be agreed with the relevant local planning authority. Please also see the Applicant's responses to First Written Questions Q1.4.6,7,8 and 9 [REP2-037].
REP2-128	Roman remains	The Scheme would prevent access to a Roman settlement.	As identified in the 'Heritage and Substation Connection Update' document also submitted at Deadline 3A, the Applicant is proposing to remove an area identified by the geophysics as a likely Roman settlement from the development to protect the underlying archaeology.
REP2-132	Archaeology	We will be unable to access archaeological remains buried within the Scheme.	The Applicant has removed a number of areas of significant archaeology from the development. Future access to the protected areas will be discussed and agreed with the County Council Historic Environment Teams and detailed in a Heritage Environment Management Plan (HEMP) Section in the Landscape Environmental Management Plan (LEMP). Impact upon archaeological remains within the development areas will be mitigated through excavation in accordance with a Detailed Archaeological Mitigation strategy (DAMS). Please also see the Applicant's responses to REP2-166, REP2-215 and Relevant Representation CCC-15 [REP1-016].
REP2-182, REP2-192	Archaeology	The Scheme will disturb archaeological treasures, with a detrimental impact for 92 designated heritage assets inside or within 1km of the proposed site.	Please see the Applicant's responses to REP2-166, REP2-215, REP2-124, REP2-128, and REP2-132 above and to First Written Questions Q1.4.6,7,8 and 9 [REP2-037]. In summary, however, the Applicant considers that it will not have a detrimental impact to archaeology, with impacts either avoided or to be mitigated through the proposed DAMS.

5.12 Theme 12 – Environment – Ecology

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-139	Habitats	Badlingham Lane's rich flora and fauna reflect the varied Breckland landscape, including heathland and hedgerow plants, deer, bats, insects, and butterflies. It is important for nesting and migrating birds, including red listed Stone Curlews and Lapwings, Amber Listed Tawny Owls, Shelducks, and Greylag Geese; the several species of raptors seen along the lane, including Kites, Buzzards and Kestrels, are testament to this abundant wildlife.	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 directs impacts on any of these habitats or species 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. This is set out in the Framework Construction Environmental Management Plan **[REP3-011]** 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.
REP2-139	Habitats	U6006 Badlingham Lane is a corridor for bats including Serotines, Leislers, and the nationally rare Barbastelle bat. It is therefore important that none of the trees and hedgerows are removed and any crossing points are kept as narrow as possible. The Applicant has requested the right to remove overhanging branches etc as part of their works, which we strongly object to.	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. 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 bats. The assessment concluded that there will be no significant effects on bats.
REP2-139	Habitats	Works outlined in the draft DCO allows for underground cabling along the entire length of the wood close to Badlingham Lane with deep cable corridors of up to 30 metres working width, which is wider than the wood itself so in practical terms the wood will be destroyed.	We understand that Badlingham Lane is the lane south of Badlingham Road (where it turns from east to north). The extent of tree removals likely required to facilitate the Scheme and cable installation is detailed in the Arboricultural Impact Assessment **[REP3-021]** submitted at Deadline 03. This demonstrates that there is very minimal tree loss in this area with all significant woodland features avoided. The cable corridor allows some flexibility for the alignment of the cable

Parties reference	Theme	Summary of issue raised	Applicant's response
			route itself (which will not occupy the full width of the corridor and will be micro-sited within the corridor to avoid constraints where feasible).
REP2-236	Habitats	A bat survey of Badlingham Lane undertaken in August 2021 identified at least seven different species of bats: Common Pipistrelle, Soprano Pipistrelle, Noctule, Myotis species (probably Natterer's Bat), the Serotine and the nationally rare Barbastelle bat, recently Red Listed by the International Union for Conservation for Nature (IUCN) as at imminent risk of extinction, and the Leisler's bat at near risk of extinction. [The Bat Conservation Trust 30 July 2020]. The importance of maintaining foraging corridors and roosting sites is vital. Construction works which break the tree line or cause prolonged habitat disturbance will affect the survival chances of all the species we recorded and may contribute to the extinction of three of the species found there. Although various Tree Preservation Orders were imposed in March 2021 the draft DCO includes powers to override TPOs.	Measures to protect wildlife, including bats, are set out in the Outline Landscape and Ecology Management Plan **[REP3-011]** and Framework Construction Environmental Management Plan **[REP3-015]**. No significant effects on bats are predicted.
REP2-103, REP2-140	Stone curlew	Stone Curlew mitigation areas appear to have been selected for convenience rather than their suitability for the birds.	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.

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-199,	Habitats	The Scheme is on and near sensitive ecological 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.
REP2-101, REP2-180,	Habitats	The Scheme will remove habitats of ecology on the list of potential extinction.	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.
REP2-101, REP2-103, REP2-106, REP2-108, REP2-119, REP2-120, REP2-121, REP2-122, REP2-124, REP2-133, REP2-157, REP2-166, REP2-172, REP2-180, REP2-182, REP2-189, REP2-192, REP2-197, REP2-199, REP2-210, REP2-233,	Habitats	The Scheme will remove habitats for existing flora and fauna.	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. Further, Appendix 10I, Landscape and Ecology Management Plan of the Environmental Statement [**REP3-015**] sets out the rationale for habitat creation, including how it forms a coherent nature network across the multiple sites. For example,

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-183, REP2-242			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, if development consent is granted. It should be noted that whilst extensive in-channel enhancements are not 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.
REP2-215	Habitats	Construction will involve moving earth and excavation over a large area, to the detriment of habitats. The Applicant cannot control activities over such a large area.	There will be no large scale moving of earth across the site. Measures to minimise impacts to habitats during construction are set out in the Framework Construction Environmental Management Plan **[REP3-011]**.
REP2-194	BNG	Analysis by Bioscan of the information submitted by the Applicant suggests an overstatement of biodiversity net gain claims and a miscalculation of baselines for the calculations.	An updated calculation of Biodiversity Net Gain using the current Defra 3.1 metric will provide further detail to demonstrate the Scheme's significant net gain contribution, however, as reported in the application, the Applicant considers that biodiversity net gain will be able to be achieved.

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-103, REP2-104, REP2-134,	Wildlife	The site currently supports a number of rare species.	Table 8-9 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement **[APP-040]** considers the impacts of the Scheme on protected and notable species. Paragraphs 8.817-8.8.23 and 8.8.28 set out avoidance and mitigation measures for protected and notable species.
REP2-222	Wildlife	Maintenance activities will harm wildlife including species that are already endangered.	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, including where relevant maintenance activities during operation, 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 during maintenance activities.
REP2-200	Wildlife	Wild deer will not be able to access their territory due to the miles of high wire fences, which could lead to deaths.	Whilst fields containing solar arrays will be subject to perimeter security fencing, sufficient boundary vegetation, such as hedgerows connecting woodland sites will be retained outside of the perimeter security fencing, to allow for connectivity across and beyond the Order limits. Further information on fencing is set out in the revised Framework CEMP submitted at Deadline 3 [**REP3-015**].
REP2-103, REP2-140, REP2-187	Stone-curlew	Stone-curlew currently breed in this area very successfully and the impacts of construction could disrupt this.	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 [**REP3-009**]. 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

Parties reference	Theme	Summary of issue raised	Applicant's response
			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 [**REP3-015**] and will be secured through the detailed CEMP; and similarly in the operational phase through the Operation Environmental Management Plan [**REP2-030**]. No additional indirect impacts are predicted.
REP2-103	Chalk grassland	Applying a 150mm layer of chalk mixed with topsoil to fields and then planting chalk grassland species is highly unlikely to result in habitat which supports a range of chalk grassland species for many years.	There are many examples of where calcareous/chalk grassland has been created from cultivated land, e.g. Kent, Wiltshire, Hampshire and Gwent. The Applicant appreciates that an appropriate programme of planning, soil preparation, seeding and management needs to be provided containing the level of detail to provide reassurance that calcareous grassland will be created and meet the agreed biodiversity criteria. The Ecology Advisory Group will have a role in commenting on this planning and implementation process and, hopefully, were the Scheme to go ahead, benefiting from the experience of such organisations as the Suffolk Wildlife Trust and the Wildlife Trust for Bedfordshire, Cambridgeshire and Northamptonshire. Further details of planning, soil preparation, implementation and management will be provided in the detailed LEMP.
REP2-103	Acid grassland	Establishment of acid grassland requires a pH of between 4 and 5.5. Arable land is maintained at a pH of approximately 6.5 to ensure good yields of crops. The Application does not include any measures to reduce the pH more rapidly, so it is unlikely the acid grassland would establish successfully in this time.	There are many examples of where acid grassland has been created from cultivated land, e.g. Norfolk, Wiltshire, Surrey and London. The Applicant appreciates that an appropriate programme of planning, soil preparation (including consideration of pH levels), seeding and management needs to be provided containing the level of detail to provide reassurance that acid grassland will be created and meet the agreed biodiversity criteria. The Ecology Advisory Group will have a role in commenting on this planning and

Parties reference	Theme	Summary of issue raised	Applicant's response
			implementation process and, hopefully, were the Scheme to go ahead, benefiting from the experience of such organisations as the Suffolk Wildlife Trust and the Wildlife Trust for Bedfordshire, Cambridgeshire and Northamptonshire. Further details of planning, soil preparation, implementation and management will be provided in the detailed LEMP.
REP2-103	Plants	Necessary spraying and mowing to reduce weeds will eliminate some of the rarer plants in cultivated margins present on the site.	As set out in The Outline Landscape and Ecology Management Plan [**REP3-011**] 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 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. Mowing is not proposed for areas supporting Stone Curlew during the breeding season.
REP2-103	BNG	There is a general lack of information as to the qualifications of the staff undertaking the BNG surveys despite requests to the Applicant for those details.	Information on staff competencies is out in the Statement of Competence **[APP-053].** All ecological surveys are undertaken by appropriately qualified and experienced surveyors, adhering to relevant standard guidelines and the Chartered Institute of Ecology and Environmental Management (CIEEM) code of conduct.
REP2-103	BNG	The NE metric employed fails to allow for the differences between continuous cereals and a 6–7-year rotation of broad-leaved and monocot crops which allows for a much greater diversity of animal, plant and insect life in and around the field margins.	The Biodiversity Net Gain calculations were undertaken using the industry recognised Defra metric 3.0 and is being updated to account for metric 3.1. The Applicant's habitat creation proposals have been designed to provide suitable ecology for a range of animal, plant and insect life.

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-124, REP2-196	BNG	Claims of enhanced biodiversity gains and mitigation enhancement, however the Applicant has failed to provide any evidence of this dubious claim.	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. The Biodiversity Net Gain Assessment [**APP-259**] 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. This will be updated further in the Examination in due course. The level of habitat creation is secured through the operation of the outline LEMP.
REP2-103	Stone curlew	The plots now designated as stone curlew plots are situated in or close to panels, in contrast to open fields and heaths where the birds usually nest. There is no evidence suggesting this will be successful.	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; and in line with RPSB guidance. See the submitted specification [**APP-258**].
REP2-103	Stone curlew	The requirement that curlew plots are kept relatively free of weeds and ground cover by cultivations and spraying raises the question of how this can be achieved in a practical manner by farm machinery.	Operational monitoring of Stone Curlew plots, secured through the OEMP [**REP2-030**], will help to establish the location of nesting locations prior to spraying commencing. This will inform the process for the application of any herbicides to Stone Curlew plots. The management of Stone Curlew plots will be within the remit of the Ecology Advisory Group, who will ensure that management techniques are compatible with protection of the species' nests and chicks, which will be undertaken pursuant to the detailed LEMP.
REP2-103	Great crested newts	Great Crested Newt has been recorded on several occasions in gardens in Worlington	No Great Crested Newt were recorded within any of the waterbodies or watercourses surveyed within the Order limits

Parties reference	Theme	Summary of issue raised	Applicant's response
		between the Moat where eDNA was recorded and the Order limits. A large ditch deemed ideal for GCN lies between the Moat and the Order limits and was not recorded in the surveys.	during the Great Crested Newt surveys. Table 8-7 in Chapter 8: Ecology and Nature Conservation of the Environmental Statement **[APP-040]** states: "*There was one positive eDNA result for GCN, from a waterbody in Worlington approximately 150m north of Sunnica East Site B. There are also unverified reports from Worlington residents of GCN in garden ponds. There is a population of GCN north of Sunnica East Site B (confirmed through positive eDNA) and this population likely uses suitable waterbodies and any seasonally available standing water in the vicinity of Worlington. There are a number of ditches on the southern side of Worlington, which if wet during early spring could be used by breeding GCN. At their closest these waterbodies are approximately 70m from the Order limits".* However, a positive Great Crested Newt eDNA sample was recorded from waterbody 1, which is approximately 150m from the Scheme. Given, the distance between any potentially suitable waterbodies and developable areas of the Scheme, the ES accepts the presence of Great Crested Newt in Worlington, but concludes that the Scheme will not result in any significant adverse effects on the species and that no further surveys are required.
REP2-103	Bats	Loss of any of trees along the Icknield Way, and the disturbance during construction is likely to disturb bats.	Measures to protect wildlife, including bats, are set out in the Outline Landscape and Ecology Management Plan **[REP3-011]** and Framework Construction Environmental Management Plan **[REP3-015]**. No significant impacts are predicted to bats. The extent of tree removals likely required to facilitate the Scheme and cable installation is detailed in the Arboricultural Impact Assessment **[REP3-021]** submitted at Deadline 03. This demonstrates that there is very minimal tree loss in this area with all significant woodland features avoided.

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-104, REP2-108, REP2-122	Wildlife	There are lots of species that will not return to the area should the Scheme go forward, because their habitats will be destroyed.	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.
REP2-108, REP2-120, REP2-124, REP2-133, REP2-134, REP2-157, REP2-160, REP2-162, REP2-164, REP2-187, REP2-190, REP2-196, REP2-197, REP2-218, REP2-222, REP2-224, REP2-253A,	Wildlife	The Scheme will harm or destroy wildlife.	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.
REP2-116	Designated sites	There are two CWS's in Worlington that fall within the Order limits – Worlington Heath and Badlingham Lane. Both need to remain undisturbed and unprotected. Worlington Heath CWS: This lowland heathland (Priority habitat) has priority species included within Suffolk's Rare Plant Register. Badlingham Lane CWS: This area support a species-rich flora characteristic of a Breckland habitat including a plant which is	Table 8-9 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement **[APP-040]** considers the impacts of the Scheme on these CWS. There will be no directs impacts on any of these habitats or species 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. This is set out in the Framework Construction Environmental Management Plan **[REP3-015]** 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.

Parties reference	Theme	Summary of issue raised	Applicant's response
		listed as near threatened within Suffolk's Rare Plant Register.	Whilst cabling may take place within Badlingham Lane CWS, the CEMP contains the principle that *"Existing designated sites within the Order land will be avoided and measures embedded within the Scheme design will ensure that they are not affected during construction e.g. through siting construction routes away from designated sites and buffer zones*".
REP2-119	Wildlife	The Application states that some protected wildlife will have to be moved.	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 and that there will be no requirements for wildlife translocations.
REP2-122, REP2-157, REP2-166, REP2-196, REP2-199	Birds	There are red-listed species of birds, such as Skylarks in the areas proposed for the Scheme. The Scheme will disturb their habitat.	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, such as extensive areas of undeveloped grasslands throughout the Scheme. These floristic rich grasslands will provide extensive nesting and foraging habitats for birds, including Skylark. 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 red listed birds such as Skylarks.
REP2-122	Comments	The failings of HS2 are well documented, and allowing this solar farm to go ahead would be ignoring the established failings of	The Scheme will lead to no significant residual effects to wildlife or habitats. Furthermore, it contains a large scale mitigation strategy involving extensive habitat creation

Parties reference	Theme	Summary of issue raised	Applicant's response
		a similar project that wrecked natural habitats and safe spaces for our wildlife.	alongside 'flat' development. It is therefore a very different scheme from the linear extensively engineered HS2 project.
REP2-120, REP2-199, REP2-196, REP2-239	Designated sites	The Scheme will adversely impact the Chippenham Fen Nature Reserve – an SSSI and RAMSAR designated site	Both direct and indirect impacts to Chippenham Fen designated site 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 [**REP3-009**], 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 [**REP3-011**]. 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

Parties reference	Theme	Summary of issue raised	Applicant's response
			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. This was confirmed further in the technical note on this topic submitted at Deadline 2 [**REP2-038**]. In any event, as noted in the Heritage and Substation Connection Update also submitted at Deadline 3A, the Applicant is proposing to remove Sunnica West B from the Scheme for heritage reasons; meaning that impacts from that site to Chippenham Fen will be avoided.
REP2-120, REP2-166	Lighting	Security lighting will be disturbing to wildlife.	Details on the management of light sources during construction to avoid and mitigate effects on wildlife are provided within Appendix 16C Framework CEMP of the Environmental Statement [**REP3-015**], 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 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 ecological receptors: a. The use of lighting will be minimised to that required for safe site operations; b. Lighting

Parties reference	Theme	Summary of issue raised	Applicant's response
			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.
REP2-127, REP2-196	Mitigation	Mitigation measures for compensating biodiversity losses are seriously inadequate.	Measures to protect wildlife, are set out in the Outline Landscape and Ecology Management Plan **[REP3-011]** and Framework Construction Environmental Management Plan **[REP3-015]**. The Applicant respectfully disagrees with the contention that these mitigation measures are inadequate; and indeed consider they are more than adequate, given the results of its BNG assessments.
REP2-127, REP2-196	Assessment	Whilst some of the biodiversity value of the area has in part been recognised this is incomplete.	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 reference to relevant appendices), with an assessment of potential impacts undertaken in Section 8.9.
REP2-127, REP2-242	Mitigation	Bodies have challenged the adequacy of compensatory arrangements for Stone-Curlew (see responses from Wildlife Trusts and Natural England).	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

Parties reference	Theme	Summary of issue raised	Applicant's response
			delivered following what has been successful with the other similar habitat and nesting plots around the Breckland area.
REP2-127	Mitigation	Other species such as yellow wagtails will not benefit from the compensatory habitats provided for stone-curlew. Some depend on taller vegetation, others on later developing more open swards, and this is currently achieved by the mosaic of habitats afforded by the current layout.	There are further areas of native grassland planting throughout the Scheme which will provide a taller sward, more suitable for species such as Yellow Wagtail.
REP2-127	Mitigation	The stone curlew compensatory areas will be welcome if they can be effectively designed so as to meet the concerns raised by Natural England, Wildlife Trusts and RSPB.	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. Details are provided in the specification submitted with the application and which will be developed post consent and 'signed off' by the local planning authority and Natural England.
REP2-127,	Comment	This is a high opportunity scheme and given the scale of the project the Applicant should demonstrate best practice and leave the natural environment in a measurably better state.	The Applicant agrees and this is demonstrated through the Outline Landscape and Ecology Management Plan **[REP3-011]** and significant biodiversity net gain delivered by the project. Habitats will be left in-situ by the Applicant at decommissioning.
REP2-169	Assessments	Assessments have shown insufficient attention to bird and animal life in the area between Badlingham Lane and the B1102 Freckenham Road.	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. These surveys incorporated all land within the Oder limits

Parties reference	Theme	Summary of issue raised	Applicant's response
			and appropriate buffers and zones of influence. Section 8.8 sets out avoidance and mitigation measures for important ecological features, with an assessment of likely residual impacts and effects undertaken in section 8.9. This has included extensive surveys of the area between Badlingham Lane and the B1102 Freckenham Road, as detailed in the technical appendices to the Biodiversity and Nature Conservation ES chapter **[APP-077-091].** These surveys have identified a wide range of locally designated wildlife sites and important flora and fauna, including notable bird, bat, plant and invertebrate species, as well as sensitive habitats. Based on these detailed surveys the Scheme has included an extensive area of non-developed land, termed ECO3, which will be the focus of positive habitat creation and management for biodiversity. Existing sensitive features have been retained and measures to avoid or minimise disturbance during construction and operation secured in the Outline Landscape and Ecology Management Plan **[REP3-011]** and Framework Construction Environmental Management Plan **[REP3-015]**.
REP2-169	Mitigation	The Scheme includes no real safeguards for existing hedgerows, shelterbelts and trees.	Measures to protect habitats, including hedgerows, shelterbelts and trees, are set out in the Outline Landscape and Ecology Management Plan **[REP3-011]** and Framework Construction Environmental Management Plan **[REP3-015]**.
REP2-242	Fencing	Deer fencing will prevent the free movement of most mammals.	Whilst, fields containing solar arrays will be subject to perimeter security fencing, these will be fitted with mammals passes, to allow mammals to continue to move across the Scheme. In addition, sufficient boundary vegetation, such as hedgerows connecting woodland sites will be retained outside of the perimeter security fencing, to allow for connectivity across and beyond the Order limits. Further detail on fencing was provided in the updated Framework CEMP submitted at Deadline 3 [**REP3-015**].
REP2-238	Equestrian impacts	The solar PV and noise will have an effect on equine receptors.	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

Parties reference	Theme	Summary of issue raised	Applicant's response
			[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**]. Regarding the effect of noise on equine receptors, 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 has been secured in the Framework Construction Environmental Management Plan **[REP2-026]** that was submitted at Deadline 2 of the Examination.

5.13 Theme 13 – Environment – Water

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-103, REP2-140, REP2-179	Impact on chalk stream	The runoff from the Scheme will increase soil erosion and this will have significant impact on the Lee Brook which our land adjoins.	The effect of runoff on Lee Brook is discussed in Chapter 9 Flood Risk, Drainage and Water Resources [**APP-041**] of the ES and is shown to be no worse than minor adverse during construction. Mitigation measures are secured within the Framework Construction Environmental Management Plan [**REP3-015**], secured by Requirement 14 of the DCO, to protect watercourses during construction. During operation surface water runoff will be managed by the measures outlined in the Drainage Strategy (an outline Drainage Strategy [**AS-010**] has been prepared for the Sunnica Energy Farm). This is secured by Requirement 12 of the DCO and demonstrates that there will be no changes to existing runoff regimes. The attenuation features to be added reduce peak runoff rates overall from the Order limits for the solar PV field areas, including allowances for climate change; therefore, reducing surface water flooding downstream.
REP2-121	Cabling	Cabling under the River Snail is unacceptable.	Directional Drilling for installation of the cable under the River Snail has been chosen to minimise impacts to the river. Paragraph 9.8.83 of Chapter 9 Flood Risk, Drainage and Water Resources [**APP-041**] of the ES explains that "*No construction works are proposed within the channel of the River Snail or its tributary which is flowing northwards on the western boundary of the Sunnica West Site B, and its tributary flowing westwards on the northern border of the site. The potential for impacts on the morphology of the channel of the River Snail and its tributary, has been assessed as no change. This results in a neutral impact, which is not considered significant*". The crossing of the river is discussed in paragraphs 9.8.121 – 9.8.127 and states "*The methodology for the Grid Connection Routes crossing the waterbodies would be via boring or tunnelling techniques. In this way, the cable would cross at least 2m below the bed of the watercourse to avoid impacts on the bed of the watercourse, or the banks of the watercourse*".
REP2-103	Soil erosion	The planting of grasses will not commence until construction is complete and the grass will not	During Operation surface water runoff will be managed by measures outlined in the Drainage Strategy (an outline Drainage Strategy has been prepared for the DCO Site [**AS-010**]). This is secured by Requirement 12 of

Parties reference	Theme	Summary of issue raised	Applicant's response
		form a sward covering the ground for 5 years. During this time there is high potential for water erosion taking soil plus nitrates and phosphates into adjacent watercourses. This could lead to eutrophication of water and consequently significant adverse effects on water life.	the DCO and demonstrates that there will be no adverse changes to existing runoff regimes. The SuDS features do not rely on the planting of grasses to work correctly. As the land use is being taken out of agriculture, there would be less nitrate, pesticide, herbicide and insecticide within the runoff compared to the existing situation.
REP2-103, REP2-187	Impact on chalk stream	The Lee Brook and the Lark which it flows into are both chalk streams which are now rare worldwide – of the 210 chalk streams in the world 160 are in England.	Please see response to REP2-103/140/179 above. During construction, measures to protect water resources are secured by Requirement 14 of the DCO, with the measures outlines in the Framework CEMP **[REP3-015]**.
REP2-103	Impact on Lee Brook	Solar panels offset from Lee Brook by 8m 16 may not leave sufficient area to prevent soil erosion entering the stream or to allow machinery access to clear soil and organic matter from the brook.	The solar panels will be offset from all watercourses by a minimum of 10m measured from the water's edge/channel extents under normal flow conditions, as described in Paragraph 9.3.8. of Chapter 9 Flood Risk, Drainage and Water Resources [**APP-041**] of the ES. The purpose of this buffer reduces the risk of any pollutants entering the watercourse directly, whilst also providing space for mitigation measures (e.g. fabric silt fences) should they be required. Section 9.8 of the chapter discusses the impacts on the Lee Brook. The 10m offset aligns with advice from Environment Agency and its guidance on protecting watercourses, and would also be sufficient to allow machinery access to clear soil and organic matter from the brook. This is a commitment in Table 3-4 of the framework Construction Environmental Management Plan (CEMP) **[REP3-015]**, secured through Requirement 14 of the DCO.

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-103	Surveys	The surveys in the area rely on old EA surveys. Rare fish were present in the EA reports and in sampling done in 2020, but no field surveys for fish were carried out by AECOM.	The solar panels will be offset from all watercourses by a minimum of 10m measured from the water's edge/channel, as noted in the response above to REP2-103. There are no likely significant effects on the rivers and watercourses identified in Chapter 9 Flood Risk, Drainage and Water Resources [**APP-041**] of the ES or Chapter 8 Ecology and Nature Conservation [**APP-040**], and therefore it was not considered necessary to carry out updated fish surveys in 2020. This approach was agreed with the councils, Natural England, and Environment Agency.
REP2-103	Pollution	The construction of the cable route and Sunnica West B could pollute streams leading to Chippenham Fen and Snailwell Poors Fen.	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 the potential for changes to hydrology and water quality. It is acknowledged that construction activities will occur within 100 m 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 **[REP3-015]**. 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

Parties reference	Theme	Summary of issue raised	Applicant's response
			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 **[REP2-012].** 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.
REP2-103	Cable route	The effects of the cabling process on smaller waterways and ditches are not clearly defined.	The Applicant considers that sufficient information is provided in Chapter 8 Ecology and Nature Conservation [**APP-040**] and Chapter 9 Flood Risk, Drainage and Water Resources [**APP-041**] of the ES to understand the impacts of the Scheme. The Applicant has made efforts to minimise impacts on waterways and ditches; no significant residual effects were identified on this receptor in the aforementioned assessments.
REP2-104	Impact on chalk stream	The River Lea could be impacted if rainwater that has run off batteries and panels runs into it – this could cause the river to become silted.	The BESS will be located on hardstanding and will be bunded, in case of any unplanned events such as spillage or fire. This is mentioned in Table 3-10 in the Framework CEMP [**REP3-015**] and the Outline Battery Fire safety Management Plan [**REP2-033**].

Parties reference	Theme	Summary of issue raised	Applicant's response
			The Drainage Strategy [**AS-010**] outlines the attenuation features which will ensure the surface water drainage mimics natural conditions. This includes SuDS features to ensure water quality mitigation for any low level of contaminants in the surface water runoff. A SUDS Simple Index Approach assessment concludes the provided mitigation is sufficient. Please refer to REP1-016 response to NE-09.
REP2-105, REP2-164, REP2-241	Water resources	There will be a damaging impact on local water resources by the amount of water needed for maintenance of these immense solar farms.	The cleaning of solar PV modules will use relatively small amounts of water per hectare, and infrequently - likely to be annually. It is likely that the water required for the infrequent cleaning of panels would be less than the volumes required for current irrigation practices across the Order limits area. 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). PV modules will require approximately 2,900m^3 of water per year, or 8m^3 per day, which is below the minimum volume to require an Abstraction Licence from the Environment Agency. For Comparison, an average 4 person residential dwelling uses approximately 0.6m3 per day (150 Litres, i.e. 0.15m3, per person – taken from British Water Flows and Loads Version 4 (2013). It is also expected that approximately 3m^3 of water per day will be required for operational staff welfare purposes. Vehicle movements associated with tankering water to site have been accounted for in the operational traffic assessment.
REP2-108	Contamination	The proposed development site runs over a groundwater Source Protection Zone, used for public water supply. This will be particularly susceptible to	Appendix 16C of the Environmental Statement contains a Framework Construction Environmental Management Plan **[REP3-015]** that has been prepared and submitted with the Application, and 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

Parties reference	Theme	Summary of issue raised	Applicant's response
		contamination due to leaching of toxic elements within panels.	Framework Construction Environmental Management Plan is covered by Requirement 14 in Schedule 2 of the draft Development Consent Order **[REP2-014]**. During Operation, the surface water drainage strategy is designed to mimic natural conditions. In Annex F: Drainage Technical Note of Appendix 9C - Flood Risk Assessment Part 4 **[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 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 Approach method assessment in Section 3.6 of the technical note [**AS-010**] 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 [**AS-010**] 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 with an isolation control to prevent runoff leaving it when using fire water. Water can be 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. In addition, refer to response to WR-142, paragraph 2.13.
REP2-113, REP2-235	Contamination	Concerned toxins could leach from solar panels into watercourses including chalk aquifers.	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. The Drainage Strategy [**AS-010**] outlines the attenuation features which will ensure the surface water drainage mimics natural conditions. This includes SuDS features to ensure water quality mitigation for any low level of contaminants in the surface

Parties reference	Theme	Summary of issue raised	Applicant's response
			water runoff. A SUDS Simple Index Approach assessment concludes the provided mitigation is sufficient. With the embedded mitigation within the design and construction methodologies, the assessment [**APP-041**] concludes there are considered to be no significant effects from the construction and operation of the Scheme. There will be an Operation Environment Management Plan in place for the Scheme. This would include regular inspection of panels, and procedures in place to mitigate the risk from pollution. Additionally, as stated in paragraph 9.7.60 within Chapter 9: Flood Risk, Drainage and Water Resources **[APP-041]** 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.
REP2-124, REP2-132	Contamination	The Applicant proposes that 'lagoons' will be constructed to store water for fire suppression; however, no provision has been made to prevent contaminated water draining into the aquifer or surrounding area.	As stated in the Outline Battery Fire Safety Management Plan [**REP2-032**] the design options for the containment include bunded sumps on internal areas, and bunded lagoons with isolation controls to contain fire water runoff. These lagoons would be impermeable to allow full containment. This will be tested following the fire and if contaminated would be tankered offsite to a suitable waste facility for treatment. The area of bunding referred to would not have pathways to the aquifer or surrounding area; it is isolated.
REP2-133	Contamination	The BESS could pollute watercourses.	Please see response to REP2-108.
REP2-187	Contamination of River Lark	Concern that there will be toxic run off during construction, that will alter the natural balance permanently and destroy the current biodiversity of the River Lark.	The effect of runoff on River Lark is discussed in Chapter 9 Flood Risk, Drainage and Water Resources [**APP-041**] of the ES and is shown to be no worse than minor adverse during construction. Mitigation measures are secured within the Framework Construction Environmental Management Plan [**REP3-016**], secured by Requirement 14 of the DCO, to protect watercourses during construction. During Operation surface water runoff will be managed by measures outlined in the Drainage Strategy. This is secured by Requirement 12 of the draft DCO and demonstrates that there will be no changes to existing runoff

Parties reference	Theme	Summary of issue raised	Applicant's response
			regimes. The attenuation features to be added reduce peak runoff rates overall from the Order limits.
REP2-255	Drainage	Cabling will have an effect on drainage in the area	With regards to construction, minimising impact on the watercourse channels is secured in Requirement 14 in the Framework CEMP [**REP3-015**]. This ensures there will be no adverse impacts to flow in the watercourse channels crossed by the cabling. This is discussed in Chapter 9 Flood Risk, Drainage and Water Resources [**APP-041**] of the ES. There are considered to be no residual effects (significant or not significant) for surface water, groundwater or flood risk during the construction, operation, or decommissioning phase of the Scheme.
REP2-166	Watercourses	Wind erosion from construction traffic on farmland could result in silting up of watercourses. Further information is needed on planned maintenance of watercourses.	Mitigation measures are secured within the Framework Construction Environmental Management Plan [**REP3-016**], secured by Requirement 14 of the DCO, to protect watercourses during construction. This includes a commitment that "*Prior to beginning work of the solar module deployment and development of the associated infrastructure vegetated cover would be established to eliminate areas of bare soil. The seed mix for this sward would be selected with reference to the Landscape and Ecology Management Plan*.". There is also a commitment to "*Increase the frequency of site inspections by the person accountable for air quality and dust issues on-site when activities with a high potential to produce dust are being carried out and during prolonged dry or windy conditions*". Within Table 3-9 of the Framework CEMP **[REP3-015]**, site management will include monitoring of any dust and air quality complaints, with measures to reduce emissions being undertaken in a timely manner. With this mitigation in place it is considered that the risk of wind erosion resulting in silting up of watercourses during construction of the Scheme is at least the same, if not less, than it is currently for the existing farming practices.
REP2-239	Watercourses	The Scheme will pollute the River Cam.	The effect of runoff on watercourses in the area is discussed in Chapter 9 Flood Risk, Drainage and Water Resources [**APP-041**] of the ES. This includes Catchwater Drain, New River and Burwell Lode which drain into the River Cam. The effects on these watercourses is shown to be no worse than minor adverse during construction. Mitigation measures are secured

Parties reference	Theme	Summary of issue raised	Applicant's response
			within the Framework Construction Environmental Management Plan [**REP3-016**], secured by Requirement 14 of the DCO, to protect watercourses during construction. During Operation surface water runoff will be managed by measures outlined in the Drainage Strategy. This is secured by Requirement 12 of the DCO and demonstrates that there will be no changes to existing runoff regimes. The attenuation features to be added reduce peak runoff rates overall from the Order limits. See response to REP2-113 and REP2-235 for more detail.
REP2-199	Chalk stream	Construction work could contaminate the local chalk streams.	Please see response to REP2-113, REP2-235.

5.14 Theme 14 – Environment – Flood Risk Assessment

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-151	Flood risk	The Scheme will increase the level of the River Lark and create a risk of flash flooding.	The Applicant disagrees that there will be an increased risk of flash flooding. The Applicant has carried out a Flood Risk Assessment (FRA) [**APP-095**] which demonstrates that: "*The Scheme will not increase the risk of flooding on or off site. Surface water runoff from the Scheme will be captured and treated by infiltration SuDS techniques; swales and basins 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 Applicant also disagrees that there will be any increased fluvial risk at the River Lark. Paragraph 4.3.8 of the FRA explains: "*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). The solar PV panels in the flood risk areas are proposed to be raised by 850mm to provide additional protection against flood risk. The legs that sit within the floodplain will not cause a barrier to flood flows as they are expected to be less than 100mm in diameter, and do not materially remove floodplain volume (floodplain in zone 3a), i.e. there is no increased fluvial risk resulting from the panels within Flood Zone 3a. There is no development in Flood Zone 3b*".
REP2-120	Flood risk	There is increased flood risk to the Fens caused by rising sea levels, which means agricultural land in this area on higher ground is at a higher premium and losing it constitutes a threat to national food supply.	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 [**PDB-001**]. 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: "*Energy underpins almost every aspect of our way of life. It enables us to heat and light our homes; to produce and transport food*…". As is reported

Parties reference	Theme	Summary of issue raised	Applicant's response
			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 EN1 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 BMV land should be interpreted for solar NSIP schemes. It clarifies at paragraph 2.48.15 that the development of solar arrays on BMV 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 "land type should not be a predominating factor in determining the suitability of the site location". 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.

Parties reference	Theme	Summary of issue raised	Applicant's response
			The introduction states: "*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*." As well as addressing climate change, the reversion of arable land to grass for 40 years will allow soil health to recover.
REP2-166	Flood risk	Run-off of rainwater from solar panels creates a risk of flooding.	Paragraph 5.3.2 of the Flood Risk Assessment (FRA) [**AS-010**] explains that individual solar PV panels will be held above the ground surface on narrow diameter mounts. This will avoid sealing the ground with impermeable surfaces. As a result, it is considered that the solar panel areas will remain consistent with their pre-development state. Runoff from the solar panels however will alter the existing routing of runoff. Shallow infiltration sustainable drainage systems (SuDS) will be implemented to reduce peak rates and peak runoff volumes. As a result, the FRA demonstrates that: "*The Scheme will not increase the risk of flooding on or off site. Surface water runoff from the Scheme will be captured and treated by infiltration SuDS techniques; swales and basins to mimic existing drainage conditions and accommodate the 1 in 100 year return period storm event plus a 40% increase allowance for climate change*."
REP2-194	Flood risk	Climate change will lead to increased flooding and will leave a high proportion of land within the Order limits liable to floods.	The Applicant has taken Climate change into account as part of its Flood Risk Assessment (FRA) [**AS-007**]. The Applicant has used the most up to date climate change allowances and guidance when carrying out the FRA [**AS-007**] and the drainage strategy [**AS-010**]. Following the initial FRA work [**AS-010**] further flood risk modelling information has been produced and as a result the Applicant is working with the Environment Agency to update the assessments. It is intended that the Applicant will submit an addendum to the Flood Risk Assessment during

Parties reference	Theme	Summary of issue raised	Applicant's response
			the examination reporting the outcome of this updated assessment in due course. Paragraph 7.1.5 of the FRA notes that it is the intention to use infiltration SuDS techniques; swales and basins 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 FRA concludes that *"the Scheme will not increase the risk of flooding on or off site. Surface water runoff from the Scheme will be captured and treated by infiltration SuDS techniques; swales and basins to mimic existing drainage conditions and accommodate the 1 in 100 year return period storm event plus a 40% increase allowance for climate change*".

5.15 Theme 15 – Environment - L&V

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-138	Landscape and visual	The Scheme will impact on Fordham because it will change the nature of the landscape around the village.	The closest area of solar panels to Fordham would be parcels W01 and W02 of Sunnica West Site B, 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 affect its setting or character. In any event, as noted in the Heritage and Substation Connection Update also submitted at Deadline 3A, the Applicant proposes to remove Sunnica West Site B from the Scheme for heritage reasons.
REP2-121, REP2-124, REP2-134, REP2-138, REP2-142, REP2-145, REP2-156, REP2-170, REP2-187, REP2-198	Visual impact	Walking between villages will be changed for the worse because of the visual impact of solar panels.	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 and public rights of way 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 reference	Theme	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 which recognises that renewable energy is likely to cause visual impacts, the Applicant considers that sufficient mitigation of landscape and visual impacts 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.
REP2-247	Landscape character	The scale and fragmented nature of the scheme has the potential to destroy the sense of place across 11 parishes.	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

Parties reference	Theme	Summary of issue raised	Applicant's response
			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

Parties reference	Theme	Summary of issue raised	Applicant's response
			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. In any event, as noted in the Heritage and Substation Connection Update also submitted at Deadline 3A, the Applicant proposes to remove Sunnica West Site B from the Scheme for heritage reasons. • 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

Parties reference	Theme	Summary of issue raised	Applicant's response
			by tree lines and dense hedgerows, creating physical separation from the sub -station. In any event, as noted in the Heritage and Substation Connection Update also submitted at Deadline 3A, the Applicant proposes to remove Option 2 from the Scheme in due course. In summary, it is acknowledged that the scale of the Scheme is large. The layout, across discrete sites, 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.
REP2-097, REP2-120,	Mitigation	A view cannot be mitigated, it can only be lost.	The Landscape and Visual Impact Assessment in Chapter 10: Landscape and Visual Amenity of the Environmental Statement **[APP-042]** recognises that there will be impacts on some views during the construction, operation and decommissioning of the Scheme. Whilst there will be views of solar farm development from some places in year 15 of operation, they will largely be screened or filtered by existing vegetation or proposed planting. This planting has been designed to retain the openness of the landscape as far as possible, including views along roads and of landmarks and skylines.
REP2-100, REP2-120, REP2-133, REP2-138, REP2-139, REP2-199, REP2-235, REP2-258	Mitigation	It is concerning that mitigation will take 15 years to become established.	The Landscape and Ecology Management Plan **[REP3-015]** 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

Parties reference	Theme	Summary of issue raised	Applicant's response
			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 *"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."* An assessment at year 15 of operation is common in LVIA to assess changes introduced by mitigation after proposed planting has established. However, the effectiveness of this planting in mitigating effects will gradually improve over this time and further beyond year 15 of operation as vegetation matures. The visualisations produced at Deadline 2 [**REP2-038**] give an indication of the expected establishment of the mitigation in year 5.
REP2-124, REP2-135, REP2-138, REP2-236, REP2-253A	Mitigation	The landscape impacts of the Scheme will not be mitigated after 15 years.	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 *"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."* 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

Parties reference	Theme	Summary of issue raised	Applicant's response
			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 Outline Landscape and Ecology Management Plan **[REP3-015]**. 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 by year 15 of operation." An assessment at year 15 of operation is common in LVIA to assess changes introduced by mitigation after proposed planting has established. However, the effectiveness of this planting in mitigating effects will gradually improve over this time and further beyond year 15 of operation as vegetation matures.
REP2-253A	Mitigation	The Applicant has admitted that the view from the Limekilns could never be mitigated.	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

Parties reference	Theme	Summary of issue raised	Applicant's response
			Order limits upon which is based and is included with the Deadline 1 Examination deliverables issued to the ExA [**REP1-008** to **REP11-013**]. 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.
REP2-097, REP2-098A, REP2-099, REP2-101, REP2-102, REP2-105, REP2-107, REP2-116, REP2-117, REP2-118, REP2-120, REP2-121, REP2-123, REP2-124, REP2-125, REP2-128, REP2-132, REP2-133, REP2-145, REP2-146, REP2-149, REP2-156, REP2-157, REP2-164, REP2-167, REP2-170, REP2-171, REP2-172, REP2-177, REP2-179,	Visual impact	The Scheme will industrialise a rural area and 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 small geographic part of the wider landscape defined in published studies, balanced with the further establishment of the extensive enhancements to 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 substantially strengthen this landscape framework with extensive grassland swards extending beneath panels and across ecological mitigation areas, delivering biodiversity net gain and amenity.

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-180, REP2-182, REP2-192, REP2-215, WR-REP2-218, REP2-224, REP2-227, REP2-197 , REP2-199, REP2-201, REP2-228, REP2-229, REP2-233, REP2-234, REP2-235, REP2-238, REP2-251, REP2-253A, REP2-256, REP2-261, REP2-198, REP2-196, REP2-194, REP2-210, REP2-214, REP2-242REP2-241, REP2-242			
REP2-119, REP2-139, REP2-236	Visual impact	Freckenham will be surrounded by the development on three sides. The Scheme will industrialise the landscape around the village and the visual impact of this will be overwhelming.	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 of Freckenham will not be affected.
REP2-139, REP2-180, REP2-224, REP2-199, REP2-210	Construction	The visual impact of construction will be significant.	The Landscape and Visual Impact Assessment presented in Chapter 10: Landscape and Visual Amenity of the Environmental Statement **[APP-042]** acknowledges that there will be some significant effects to several visual receptor groups during construction. These temporary effects are described in detailed in Appendix 10H [**APP-107**].

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-098A, REP2-118, REP2-128, REP2-139, REP2-149, REP2-166, REP2-186, REP2-227, REP2-242	Landscape	The Scheme will destroy the traditional Breckland and Fen edge 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. The Scheme will not destroy the Fen edge landscape.
REP2-139, REP2-247	Assessment	Details of features like the BESS have been omitted meaning assessments do not give a true picture of the Scheme's visual impact.	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 the Scheme. Flexibility within the design parameters and principles set out in the Application is retained for the detailed design, but this is balanced against assessing the environmental impact of a project against these 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 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

Parties reference	Theme	Summary of issue raised	Applicant's response
			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 developments will likely bring improvements in the operating efficiency and generating potential of the Scheme.
REP2-120	Assessment	The applicant has completely misunderstood or deliberately ignored the gentle local landscapes in both Cambridgeshire and Suffolk and has failed to comprehend their significance.	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 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]**. The Applicant recognises that there are parts of the landscape to which higher value is attached at the local level. 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

Parties reference	Theme	Summary of issue raised	Applicant's response
			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. 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 paragraph 5.10.23 establish that mitigation that would result in a reduction in function of an energy NSIP are only warranted in *"…exceptional circumstances, where mitigation could have a very significant benefit and warrant a small reduction in function".*
REP2-139	Landscape	The presence of solar panels on both sides of the road in areas, such as the A11 along Elms Road, will have a negative visual impact for people driving in the area.	The Landscape and Visual Impact Assessment in Chapter 10: Landscape and Visual Amenity of the Environmental Statement **[APP-042]** provides a detailed assessment on people's views of the landscape, including motorists. This includes people travelling along the A11, which are represented by viewpoint VP37B. The Scheme will be visible in oblique views at speed on a short section of road and effects in all assessment scenarios have been assessed as not significant. Views of people travelling along Elms Road are represented by viewpoints VP18 and VP19. A section of approximately 800m of Elms Road will be located between parcels to the north and south. Significant effects have been identified in construction,

Parties reference	Theme	Summary of issue raised	Applicant's response
			year 1 of operation and decommissioning, with effects during year 15 of operation being not significant due to the establishment of proposed planting.
REP2-179, REP2-227	Landscape	The hedging and tree belts proposed at EO5 will destroy the historic long and wide-ranging views over the Isleham area both to and from the village. This Scheme will dramatically shorten views that have historically not been hedged or heavily wooded.	Sunnica East Site A lies on the southern periphery of the Fens. The Ordnance Survey (OS) Six Inch map of 1888-1913 indicates an historical pattern of small strip fields around the edges of Isleham and extending north into the Fens. A comparison with modern OS maps and aerial photographs available online through the National Library of Scotland indicates that there has been some development around the edges of the settlement and amalgamation of fields to accommodate modern farming practices. Sunnica East Site A avoids these more intricate historical field patterns and is located in an area either side of Lee Brook, which the 1888-1913 OS indicates has largely retained its larger-scale field pattern. Key changes are the removal of the Cambridge to Mildenhall railway line across the southern part of the site and the expansion of Lee Farm and the introduction of large reservoirs. Solar panels would be located approximately 500m from the south eastern corner of Isleham in parcel E05 of Sunnica East, beyond Sheldrick's Road and intervening arable land. A belt of woodland is proposed to enclose and screen the structures. The village of Isleham is elevated above the surrounding landscape at approximately 15m Above Ordnance Datum (AOD). Sunnica East Site A lies at approximately 10m AOD. 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. The lower height of the land within Sunnica East Site A means that views across the site from the eastern edges of Isleham towards the landmarks and wooded skyline to the east will be retained. 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

Parties reference	Theme	Summary of issue raised	Applicant's response
			by increasing tree cover, reinforcing field boundaries and improving the age structure of trees in the landscape.
REP2-110	Landscape character	The Scheme will negatively impact on NCA 87: East Anglian Chalk as any development which impacts the simple uninterrupted landscape must cause harm. The Scheme takes up a vast amount of land in the narrow part of the character area where the Scheme is site, filling the gaps between Newmarket gallops, Chippenham Park and Fen and therefore removing the landscape character.	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. NCA 87 occupies a substantial tract of land extend north east from Letchworth Garden City to the Breckland east of Newmarket. The Scheme affects a small part of this landscape receptor at its north eastern end. It is notable that there are several existing solar farms which have been consented and successfully integrated into the lower lying parts of this landscape, for example the four solar farms north and east of Royston 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 boundaries. Ecological mitigation area ECO5 would introduce new native grassland to enhance the biodiversity of the area. 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.
REP2-110	Mitigation	Some traditional grassland forms part of the mitigation proposed, which is in line with the landscape assessment of NCA87. However, this will not mitigate the impact of the panels. Tree planting can be more effective but this is not to be encouraged in this landscape	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.

Parties reference	Theme	Summary of issue raised	Applicant's response
		as it merely adds to the breaking up of the simple uninterrupted views.	The Scheme is focused within the lower-lying parts of NCA87, not the chalk ridge which is referred to in the NCA description. 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.
REP2-236	Change to the landscape	The speed of change that will be brought about if the Scheme is built will be comparatively fast as organic changes to an area happen slowly over many years. This is detrimental.	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. 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. Settlements, for example Newmarket, Red Lodge and Isleham have also grown substantially since the middle of the 20th century. 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. 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 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

Parties reference	Theme	Summary of issue raised	Applicant's response
			routes, they will largely be screened or filtered by existing vegetation or proposed planting.
REP2-106, REP2-133, REP2-149, REP2-181, REP2-183, REP2-184, REP2-222, REP2-235, REP2-261,	Visual amenity	The Scheme would reduce the enjoyment of living in the countryside due to its visual impact.	Chapter 10: Landscape and Visual Amenity of the Environmental Statement **[APP-042]** acknowledges that there will be impacts on the landscape, and people's views of 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 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. This planting has been designed to retain the openness of the landscape as far as possible, including views along roads and of landmarks and skylines. For example, the planting along La Hogue Road has been set back from the existing boundary to preserve views south towards the Limekilns and east to Chippenham Park.
REP2-107, REP2-118, REP2-120, REP2-180, REP2-199, REP2-251, REP2-251	Mitigation	No amount of shielding will be sufficient enough to screen project.	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). This planting has been designed to retain the openness of the landscape as far as possible, including views

Parties reference	Theme	Summary of issue raised	Applicant's response
			along roads and of landmarks and skylines. The pattern of the landscape will be preserved and enhanced through this planting, with species selected which respond to the local landscape character and increase resilience to climate change.
REP2-097	Mitigation	The mitigation in the open flat landscape will never look natural and will therefore always been ineffective.	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.
REP2-126, REP2-136, REP2-154, REP2-164, REP2-170, REP2-214, REP2-221, REP2-239, REP2-253A	Visual impact	The Scheme will impact negatively on views from the Limekilns and Waterfall training grounds.	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].** 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

Parties reference	Theme	Summary of issue raised	Applicant's response
			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 [**REP1-008** to **REP1-013**]. 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. 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.
REP2-102, REP2-125, REP2-134, REP2-166, REP2-198, REP2-234, REP2-242, REP2-247	BESS	The visual impact is worsened by the inclusion of the BESS.	Chapter 10: Landscape and Visual Amenity of the Environmental Statement **[APP-042]** considers the BESS in drawing conclusions on the visual impacts of the Scheme where these elements would be visible. As the exact layout of the BESS has not been determined within the outline design, this assessment is based on the maximum parameters which represents a worst-case scenario. 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

Parties reference	Theme	Summary of issue raised	Applicant's response
			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.
REP2-102	Visual impact	Chippenham will be flanked on three sides by the Scheme.	This small village of Chippenham 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.
REP2-116, REP2-117, REP2-119, REP2-120, REP2-121, REP2-124, REP2-125, REP2-132, REP2-136, REP2-139, REP2-166, REP2-189, REP2-198, REP2-214, REP2-234, REP2-253A, REP2-254, REP2-256, REP2-209, REP2-210, REP2-212, REP2-236	Visual impact	The visual impact of the entire Scheme will destroy scenic views and open landscapes.	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 small geographic part of the wider published studies, balanced with the further establishment of the proposed Green Infrastructure. No other significant effects are predicted to landscape at year 15. 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 reference	Theme	Summary of issue raised	Applicant's response
REP2-193	Visual impact	The serenity of Snailwell would be severely damaged.	This small village of Snailwell lies to the north of Chippenham Park and Gardens. The description of Local Landscape Character Area (LLCA) 21: Snailwell in paragraph 3.21.4 of Appendix 10E [**APP-104**] states that "*there is no sense of remoteness due to the land use and the visible and audible presence of vehicles through the village, which lowers the tranquillity*". 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 serenity of Snailwell will not be affected.
REP2-102, REP2-107, REP2-198	Visual impact	Nearly all routes in and out of villages will be affected by the Scheme which will be overbearing.	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 decommissioning due to the brief exposure

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			to views, oblique to the direction of travel of the tops of panels beyond intervening vegetation. 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.
REP2-105	Visual impact	Badlingham Lane will be enclosed either side by panels.	The unclassified road U6006 runs through Sunnica East Site B between the southern edge of Worlington in the north and Elms Road in the south. The route passes between two rows of mature trees and dense vegetation, which enclose much of its length and screen views out to the wider landscape. The Outline Landscape and Ecology Management Plan (OLEMP) [**REP3-011** and **REP3-012**], explains how impacts on U6006 will be addressed, including with reference to the associated County Wildlife Site (CWS). The Landscape Masterplan illustrated in Figure 3 and the Illustrated Cross Section in Figure 10 of the OLEMP provide information on the proposed mitigation. The U6006 will be crossed by the Applicant to provide access between parcels E12 and E13.
REP2-227	Visual impact	Parcels E01 to E04 and E33 will all be visible from The Ark Church and Sheldricks Road.	Sunnica East Site A lies on the southern periphery of the Fens. The Ordnance Survey (OS) Six Inch map of 1888-1913 indicates an historical pattern of small strip fields around the edges of Isleham and extending north into the Fens. A comparison with modern OS maps and aerial photographs available online through the National Library of Scotland indicates that there has been some development around the edges of the settlement and amalgamation of fields to accommodate modern farming practices. Sunnica East Site A avoids these more intricate historical field patterns and is located in an area either side of Lee Brook, which the 1888-1913 OS indicates has largely retained its larger-scale field pattern. Key changes are the removal of the Cambridge to Mildenhall railway line across the southern part of the site and the expansion of Lee Farm and the introduction of large reservoirs. Solar panels would be located approximately 500m from the south eastern corner of Isleham in parcel E05 of Sunnica East, beyond Sheldrick's Road and intervening arable land. A belt of woodland is proposed to enclose and

Parties reference	Theme	Summary of issue raised	Applicant's response
			screen the structures. The village of Isleham is elevated above the surrounding landscape at approximately 15m Above Ordnance Datum (AOD). Sunnica East Site A lies at approximately 10m AOD. 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. The lower height of the land within Sunnica East Site A means that views across the site from the eastern edges of Isleham, including the Ark, towards the landmarks and wooded skyline to the east will be retained.
REP2-118	Visual impact	A 30ft high wall will be built between the transformers and substation on each of the three sites which will have a further adverse effect on the existing rural landscape.	It is not the case that a 30ft high wall will be built between the transformers and substation. The height parameters for the Scheme are set out in the Design and Access Statement **[APP-264]**. 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.
REP2-120, REP2-254, REP2-261	Visual impact	The Scheme will have a negative effect on key views from the hills above Newmarket.	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

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			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.
REP2-120	Visual impact	The Scheme will have a negative effect on key views from Dalham Hall.	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 visual relationship with the Scheme was identified.
REP2-120	Visual impact	The Scheme will have a negative effect on key views from the Icknield Way Trail.	There is no harm to the Icknield Way Trail, which passes some 2km to the east. A possible section of the historical route of the Icknield way within the Order limits is shown on the Parameter Plan, Figure 3.1 **[APP-135]**, referred to elsewhere in this document and in relevant representations from other interested parties as the U6006. 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 and access track between parcels

Parties reference	Theme	Summary of issue raised	Applicant's response
			E12 and E13. However, this part of U6006 will revert to its original appearance following construction, apart from the access track will cross the route.
REP2-120	Visual impact	The Scheme will have a negative effect on key views from the Devils Dyke across Burwell Fen to Ely Cathedral.	ES Chapter 3, Scheme Description [**REP2-022**] describes the Option 2 extension to Burwell National Grid Substation. This option lies with Local Landscape Character Area (LLCA) 36: Burwell Fen, defined by the Applicant in the Landscape and Visual Impact Assessment (LVIA) summarised in Chapter 10 of the ES [**APP-042**]. At the county level it falls within Area 2: Fenlands, defined within the Cambridge Landscape Guidelines. The effects on the landscape at both scales has been assessed by the Applicant as not significant in all assessment scenarios. 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. The existing substation is a feature in existing views from and the proposed Option 2 extension of the substation would be seen in this context. The effects of this change would not be significant, as supported by the assessment for viewpoints VP58 and VP59. In any event, the Applicant is now in a position to remove Option 2, as discussed in the Heritage and Substation Connection Update also submitted at Deadline 3A.
REP2-120, REP2-147, REP2-162	Ancillary infrastructure	Security measures such as CCTV and fencing will add to the visual impact of the Scheme.	The visual impact of fences and CCTV cameras have been considered as part of the Landscape and Visual Impact Assessment (LVIA) summarised in chapter 10 of the ES. Adverse effects have been identified for some visual receptors during construction and year 1 of operation, when there could be more open views of perimeter fencing through vegetation. Proposed boundary fences are shown on the Environmental Masterplan submitted at Deadline 3 [**REP3-022**]. As illustrated in Figures 8 to 13 of the Landscape and Ecology Management Plan [**REP3-011**] proposed boundary fences are generally offset from field boundaries and on the inside of vegetation lining roads and property boundaries. This means that they

Parties reference	Theme	Summary of issue raised	Applicant's response
			would largely be screened by existing or proposed vegetation by year 15 of operation and visual effects would not be significant.
REP2-120	Substation	CPRE are concerned for the visual amenity of the residents of Burwell if the existing National Grid installation were to be further expanded.	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 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. In any event, the Applicant is now in a position to remove Option 2, as discussed in the Heritage and Substation Connection Update also submitted at Deadline 3A.
REP2-182	Mitigation	Planting native hedging will take years to grow to obscure the panels and longer to screen the battery storage units, both of which would be particularly alien to the existing farming and countryside landscape.	The Landscape and Ecology Management Plan **[REP3-011]** explains that planting proposed as part of the Scheme would comprise woodland, tree planting and hedgerows of 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

Parties reference	Theme	Summary of issue raised	Applicant's response
			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 *"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."*
REP2-133,	Mitigation	Will the Applicant replace saplings that do not establish e.g., due to drought?	The Outline Landscape and Ecology Management Plan **[REP3-011]** sets out the landscaping proposals, including measures for hedgerow creation and infilling and tree planting and maintenance. An assessment will be carried out by a landscape architect at the end of each growing season in the first five years post-planting. Paragraph 1.7.41 confirms that "*new tree plantings would be subject to the maintenance regimes, in which all plants found to be dead or dying would be replaced within the first available planting season".*
REP2-258	Mitigation	A more sensible timeframe for the establishment of screening should be a maximum of 3-4 years.	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 **[REP3-011]** and the Framework Construction Environmental Management Plan **[REP3-015]**.

Parties reference	Theme	Summary of issue raised	Applicant's response
			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. 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 *"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."* 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]**.
REP2-257	Mitigation	There is no set back from the Elms Farm Travelling Community but on other areas of development, they have been set back at least 500m from houses.	A belt of trees and shrubs is proposed along the eastern edge of parcels E20, E21 and E22, which will provide an effective screen by year 15 of operation. The Applicant will explore options to provide temporary screening while this vegetation establishes – this will be set out in the next iteration of the LEMP.
REP2-258	Landscaping plan	The landscaping plan is inadequate, and a more comprehensive plan would	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

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		extend the environmental benefit of the Scheme.	Management Plan **[REP3-011** and **REP3-012]** 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. The Applicant has published an Environmental Masterplan [**REP3-022**] which provides further detail on the mitigation proposed.
REP2-170	Visual impact	Using the Elms Road will be less pleasant due to the visual impact of the Scheme.	The Landscape and Visual Impact Assessment in Chapter 10: Landscape and Visual Amenity of the Environmental Statement **[APP-042]** provides a detailed assessment on people's views of the landscape, including motorists. This includes people travelling along the A11, which are represented by viewpoint VP37B. The Scheme will be visible in oblique views at speed on a short section of road and effects in all assessment scenarios have been assessed as not significant. Views of people travelling along Elms Road are represented by viewpoints VP18 and VP19. A section of approximately 800m of Elms Road will be located between parcels to the north and south. Significant effects have been identified in construction, year 1 of operation and decommissioning, with effects during year 15 of operation being not significant due to the establishment of proposed planting.
REP2-210, REP2-214	Visual impact	The visual impact is not confined to boundaries of the scheme but well beyond, stretching across significant areas of Suffolk and Cambridgeshire.	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. Zones of Theoretical Visibility (ZTV) have been prepared [**REP1-008** to **REP1-013**] which show areas of land from where the Scheme would theoretically be visible from. These plans do not take account of the acuity of the eye and only incorporate the more substantial blocks of vegetation and buildings. The low height of the development, the relatively flat landscape and extent of existing vegetation substantially limit the extent of visual effects. 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

Parties reference	Theme	Summary of issue raised	Applicant's response
			operation relate to recreational users and users of the training grounds at the Limekilns (38). These residual effects would be Moderate Adverse.
REP2-124, REP2-128, REP2-132, REP2-157, REP2-177, REP2-182, REP2-192, REP2-199, REP2-209, REP2-235	Visual impact	The impact on views will destroy the enjoyment of PROWs.	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].**
REP2-120, REP2-128	Assessment	There appears to have been no analysis of the effects upon views for those using the PROW network which would be badly impacted by the Scheme.	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 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.
REP2-254	Tourism	The loss of quality landscape will put off tourists.	The Applicant's EIA Scoping Report **[APP-051]** submitted to PINS contained no specific reference to an assessment of effects on tourism as

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			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.
REP2-149	Visual impact	Planting to screen development by Beck Road and Sheldricks Road will have a negative visual impact in its own right – it will disrupt cherished traditional views.	Sunnica East Site A lies on the southern periphery of the Fens. The Ordnance Survey (OS) Six Inch map of 1888-1913 indicates an historical pattern of small strip fields around the edges of Isleham and extending north into the Fens. A comparison with modern OS maps and aerial photographs available online through the National Library of Scotland indicates that there has been some development around the edges of the settlement and amalgamation of fields to accommodate modern farming practices. Sunnica East Site A avoids these more intricate historical field patterns and is located in an area either side of Lee Brook, which the 1888-1913 OS indicates has largely retained its larger-scale field pattern. Key changes are the removal of the Cambridge to Mildenhall railway line across the southern part of the site and the expansion of Lee Farm and the introduction of large reservoirs. Solar panels would be located approximately 500m from the south eastern corner of Isleham in parcel E05 of Sunnica East, beyond Sheldrick's Road and intervening arable land. A belt of woodland is proposed to enclose and screen the structures. The village of Isleham is elevated above the surrounding landscape at approximately 15m Above Ordnance Datum (AOD). Sunnica East Site A lies at approximately 10m AOD. Solar panels in

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			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. The lower height of the land within Sunnica East Site A means that views across the site from the eastern edges of Isleham towards the landmarks and wooded skyline to the east will be retained. 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.
REP2-149	Landscape character	The Scheme will detract from the rural landscape character of the area around 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.
REP2-166	Mitigation	Planting does not adequately take into account the impact of climate change.	The Outline Landscape and Ecology Management Plan (OLEMP) guides 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 *"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*." The OLEMP has been updated to provide further detail on the provenance of plant material to increase resilience to climate change [**REP3-011** and **REP3-012**].
REP2-251	Visual impact	The Ark Church has been positioned at the highest point of elevation within the village to	Sunnica East Site A lies on the southern periphery of the Fens. The Ordnance Survey (OS) Six Inch map of 1888-1913 indicates an historical

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		take advantage of far-reaching views, which would be destroyed by Sunnica East Site A.	pattern of small strip fields around the edges of Isleham and extending north into the Fens. A comparison with modern OS maps and aerial photographs available online through the National Library of Scotland indicates that there has been some development around the edges of the settlement and amalgamation of fields to accommodate modern farming practices. Sunnica East Site A avoids these more intricate historical field patterns and is located in an area either side of Lee Brook, which the 1888-1913 OS indicates has largely retained its larger-scale field pattern. Key changes are the removal of the Cambridge to Mildenhall railway line across the southern part of the site and the expansion of Lee Farm and the introduction of large reservoirs. Solar panels would be located approximately 500m from the south eastern corner of Isleham in parcel E05 of Sunnica East, beyond Sheldrick's Road and intervening arable land. A belt of woodland is proposed to enclose and screen the structures. The village of Isleham is elevated above the surrounding landscape at approximately 15m Above Ordnance Datum (AOD). Sunnica East Site A lies at approximately 10m AOD. 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. The lower height of the land within Sunnica East Site A means that views across the site from the eastern edges of Isleham towards the landmarks and wooded skyline to the east will be retained. The Applicant has noted the open setting of the Ark in the Landscape and Visual Impact Assessment (LVIA) summarised in Chapter 10 of the ES [**APP-042**]. The most open views are from the extensive car park to the south of the building. Views from the building are limited principally to offices on the eastern façade. The main activities of the church are focused in the centre of the building and are not affected by views of the surrounding landscape.
REP2-251	Visual impact	The Scheme would destroy visual connectivity between churches (eg. St Mary's Parish	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

Parties reference	Theme	Summary of issue raised	Applicant's response
		Church in Mildenhall and the Ark Church)	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. Sunnica East Site A lies on the southern periphery of the Fens. The Ordnance Survey (OS) Six Inch map of 1888-1913 indicates an historical pattern of small strip fields around the edges of Isleham and extending north into the Fens. A comparison with modern OS maps and aerial photographs available online through the National Library of Scotland indicates that there has been some development around the edges of the settlement and amalgamation of fields to accommodate modern farming practices. Sunnica East Site A avoids these more intricate historical field patterns and is located in an area either side of Lee Brook, which the 1888-1913 OS indicates has largely retained its larger-scale field pattern. Key changes are the removal of the Cambridge to Mildenhall railway line across the southern part of the site and the expansion of Lee Farm and the introduction of large reservoirs. Solar panels would be located approximately 500m from the south eastern corner of Isleham in parcel E05 of Sunnica East, beyond Sheldrick's Road and intervening arable land. A belt of woodland is proposed to enclose and screen the structures. The village of Isleham is elevated above the surrounding landscape at approximately 15m Above Ordnance Datum (AOD). Sunnica East Site A lies at approximately 10m AOD. 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. The lower height of the land within Sunnica East Site A means that views across the site from the eastern edges of Isleham towards the landmarks, including the distant church towers in Mildenhall and Freckenham, and the wooded skyline to the east will be retained.

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-251	Visual impact	Those who worship at the Ark Church benefit both spiritually and emotionally from our rural setting and that this would be significantly / detrimentally affected should these views be lost.	The Applicant has noted the open setting of the Ark in the Landscape and Visual Impact Assessment (LVIA) summarised in Chapter 10 of the ES [**APP-042**]. The most open views are from the extensive car park to the south of the building. Views from the building are limited principally to offices on the eastern façade. The main activities of the church are focused in the centre of the building and are not affected by views of the surrounding landscape.
REP2-247	Assessment	The fragmented nature across such a diversity of landscape types means that the assessment of impacts is both complex and challenging and results in significant landscape harm. This complex tapestry of different landscapes will be lost under a vast swathe of panels, battery storage, solar stations, car parks, fencing and other infrastructure. The grain and character of this historic pattern of different landscape types will be permanently changed as the transition from one landscape type to the next will become blurred.	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 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

Parties reference	Theme	Summary of issue raised	Applicant's response
			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. The Applicant considers that sufficient mitigation of landscape and visual impacts have been incorporated into the design of the Scheme, taking account of the characteristics of the landscape surrounding the Scheme, and that residual landscape impacts that have been identified do not outweigh its benefits or necessitate further mitigation.
REP2-247	Limekilns	The submitted LVIA fundamentally underestimates the sensitivity of this landscape by assessing the Limekilns Gallops as being of medium value.	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. 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*

Parties reference	Theme	Summary of issue raised	Applicant's response
			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.
REP2-247	Newmarket	The industrialising effects of the scheme have the potential to materially harm the character and appearance of the setting of Newmarket.	The Landscape and Visual Impact Assessment (LVIA) summarised in Chapter 10 of the ES [**APP-042**] defines the character of Newmarket at its immediate landscape setting with reference to the following Local Landscape Character Areas (LLCA) defined by the Applicant: LLCA 40: Exning LLCA 41: Newmarket LLCA 26: Limekilns and gallops LLCA 27: Newmarket studs LLCA 39: Burwell wooded chalklands LLCA 42: Newmarket racecourse LLCA 43: Burwell chalklands Analysis of these LLCA demonstrates that, whilst there are some common characteristics which relate the town to its setting and contribute to sense of place, there are also clear local variations. The Applicant agrees that its history and heritage contribute to its character, but it is important to note that this is not a static character and that it has changed substantially over time. This is clearly evident from a comparison of Ordnance Survey maps published over the past 150 years. The town has grown considerably, particularly in the post-world war two period as horseracing developed from a pastime to an international industry. The human influence on this landscape is evident throughout and the Scheme will not destroy this landscape.

Parties reference	Theme	Summary of issue raised	Applicant's response
			No part of the Scheme would be located within these LLCA, with the exception of a section of Cable Route B north of Landwade, approximately 3.4km north west of the urban edge of Newmarket. The LVIA has separately assessed impacts on the landscape as a resource in its own right and on peoples' views of the landscape and their visual amenity. Intervisibility between the Scheme and Newmarket will be limited to LLCA 26, due to the openness and sloping aspect. The Scheme will be visible from the Limekilns Gallops, as evidenced in the photomontage presented in Figure 10-100 [**APP-230**] and the Applicant has assessed the residual visual effects to be moderate adverse at year 15 of operation, which is significant. As no part of the Scheme falls within LLCA 26, impacts on its character relate to its setting, which is defined in part by the site but also includes the busy A14 and A11 trunk roads and railway lines. The key characteristics listed in Appendix 10E [**APP-104**] would remain and the significance of effect has been assessed as minor adverse by year 15 of operation.
REP2-247, REP2-194	Limekilns	Sunnica West A will impact directly on the long panoramic views to the countryside beyond, which can include Ely Cathedral standing as majestic emblem within the fenland landscape, with the development visible across the full horizon. This 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. Views of Ely Cathedral, which is located 20km to the north, are difficult to perceive with the naked eye, will be preserved.

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-214	Solar panel height	The solar panels proposed are 2.5 metres in height, but what the Applicant seems to avoid admitting is that the panels themselves will be on top of metal supports which will likely raise their overall height to at least 3.5 – 4.0 metres. This is huge and will take years to camouflage	Table B-1 Work No. 1 Design Principles states that "*The maximum height of the highest part of the solar PV modules will be 2.5m AGL."* This includes the metal supports and solar panels. 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 **[REP3-011].** 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 submitted at Deadline 2 [REP2-038]: • Viewpoint 5: View south-east from Beck Road (Sunnica East Site A) • Viewpoint 15A: View south from U6006 (Sunnica East Site B)

Parties reference	Theme	Summary of issue raised	Applicant's response
			• Viewpoint 32: View south-west from La Hogue Road (Sunnica West Site A) • Viewpoint 46: View north from Fordham Road (Sunnica West Site B)
REP2-247	Landscape character	Sunnica East A and B including the BESS will dwarf those of nearby villages including Worlington and Freckenham.	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].** • 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

Parties reference	Theme	Summary of issue raised	Applicant's response
			of the Scheme and the potential effects on the setting of the settlement. • 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.
REP2-247	Photomontages	There is an inadequate number of photomontages. Their value is limited as they show summer foliage only and do not accurately represent the BESS infrastructure.	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, 3rd Edition, which states in paragraph 8.16 that *"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 is used, allowing the significant visual effects to be illustrated at a range of representative locations covering the types of visual receptor."* 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. 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 **[REP3-011]** 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

Parties reference	Theme	Summary of issue raised	Applicant's response
			deciduous trees and shrubs, and evergreen trees including the locally characteristic Scots Pine (Pinus sylvestris). 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.
REP2-247	Photomontages	There are no viewpoints to the south from the avenue between Chippenham Park and the Limekilns. This is of particular concern as no mitigation planting along the facing boundaries of parcels W06, W03 and EC05 of West Site A is shown on the proposal.	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]**). 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. With this conclusion in mind, it was not considered necessary for viewpoints to be provided facing south from this location.
REP2-238	Equestrian	There are additional impacts to horse riders as they will be able to observe the Scheme from height.	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 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."*

Parties reference	Theme	Summary of issue raised	Applicant's response
			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 the Relevant Representation response document) [**REP1-017** to **REP1-022**]. 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.

5.16 Theme 16 – Environment – Socio-economics

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-098A, REP2-104, REP2-105, REP2-107, REP2-116, REP2-118, REP2-119, REP2-121, REP2-123, REP2-132, REP2-133, REP2-147, REP2-156, REP2-160, REP2-180, REP2-182, REP2-191, REP2-192, REP2-202, REP2-202 REP2-218, REP2-235, REP2-249, REP2-183, REP2-184, REP2-196, REP2-209, REP2-210, REP2-238, REP2-239, REP2-243	House prices	Property prices have already been negatively impacted by the Scheme and this will get worse should the Scheme obtain planning consent.	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, it is not the Applicant's experience that solar development impacts negatively upon the value of properties.
REP2-098A	House prices	I have been unable to sell my home due to the Scheme.	See response above.
REP2-243	Developers	What do house builders think of the Scheme who wish to build in the area?	The Applicant is not aware of any relevant representations from house builders in the area.
REP2-251	Compulsory purchase	The compulsory purchase of several sections of land will unnecessarily and detrimentally affect people's economic livelihood.	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 **[AS-295]** and the evolution of the Scheme is explained in the Design and Access Statement **[AS-312]**. 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

Parties reference	Theme	Summary of issue raised	Applicant's response
			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. Where compulsory acquisition powers are used the affected persons will be compensated accordingly. The Statement of Reasons **[REP2-018]** sets out the consideration of the impact on affected persons from the use of compulsory acquisition powers, and sets out the justification for the compulsory acquisition powers sought.
REP2-105, REP2-107, REP2-119, REP2-121, REP2-124, REP2-132, REP2-133, REP2-215, REP2-236, REP2-253A, REP2-254, REP2-184, REP2-194, REP2-208, REP2-210, REP2-243	Local benefit	There are no social or economic benefits to the community.	The Applicant is committed to providing a legacy of community benefits through the Scheme. This includes a skills programme designed to provide local people with opportunities to work on an operational solar and battery storage installation. An Outline Skills, Supply Chain and Employment Plan has been submitted as part of the DCO Application and has been updated in response to previous representations **[REP2-034]**. The Applicant's response to paragraphs 12.87, 12.88 and 12.93 in Chapter 12 of the Applicant's Response to the Local Impact Report **[REP3-019]** as submitted at Deadline 3 provides details on how the Applicant will work with the local planning authorities to develop a full Skills Plan. Specific measures such as those referred to in the LIR can be discussed, confirmed and agreed in this full Skills Plan. In addition, the Applicant is in discussions with the council regarding wider community benefits. As set out in Chapter 12 of the Environmental Statement **[APP-044]**, it is estimated that construction of the Scheme will generate 1,685 net additional jobs per annum, of which 1,483 will be within 45 minutes travel time; and operation will generate 29 net additional jobs, of which 27 will be within 45 minutes travel time.
REP2-102, REP2-202, REP2-243, REP2-253A, REP2-256	Local benefit	It wouldn't offer cheaper electricity for residents.	As stated in the Applicant's Responses to Relevant Representations **[REP1-016]**, 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.

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-101, REP2-102	Employment	The surrounding area is highly employed, so it is not clear where the workforce needed for the Scheme is to be found and/or housed.	The average number of workers required on-site during the construction period will be 964 as set out in Chapter 12 of the Environmental Statement **[APP-044]**. Within the Study Area (45 minute drive time) there are 27,872 unemployed people who are defined as 'Economically active: Unemployed'. If the demand for construction labour was fully sourced from the 'potentially available labour pool' (i.e. the economically active unemployed), it would account for 3.5% of unemployed workers in the study area.
REP2-102, REP2-121, REP2-124, REP2-134, REP2-253A	Employment	It will generate minimal local employment after construction, and construction employment will only be temporary.	As stated in the Applicant's Responses to Relevant Representations **[REP1-016]**, the Applicant is committed to providing a legacy of community benefits through the Scheme. This includes the Outline Skills, Supply Chain and Employment Plan (OSSCEP) which was submitted as part of the DCO Application **[REP3-017]**. The Applicant will source locally where possible and has had regard to feedback received through the statutory consultation which identifies local businesses and opportunities to promote local skills development. The Applicant's response to paragraphs 12.87, 12.88 and 12.93 in Chapter 12 of the Applicant's Response to the Local Impact Report **[REP3-019]** as submitted at Deadline 3 provides details on how the Applicant will work with the local planning authorities to develop a full Skills Plan. Specific measures such as those referred to in the LIR can be discussed, confirmed and agreed in this full Skills Plan. As set out in Chapter 12 of the Environmental Statement **[APP-044]**, it is estimated that operation of the Scheme will generate 29 net additional jobs, of which 27 will be within 45 minutes travel time. The assessment of operational employment set out in Chapter 12 of the ES **[APP-044]** concluded that whilst the maintenance and engineering activities during operation will generate some employment, this will be modest given the intensity of these activities and there would be a negligible effect on the local economy arising from this.
REP2-132	Employment	The size and specialised nature of the Scheme will surely exclude all but very minimal local business involvement.	The Applicant has stated a general aspiration to involve local businesses and contractors as far as practicable during the construction phase. A supply chain event would be held prior to the start of construction to help identify local businesses and contractors with relevant capabilities.

Parties reference	Theme	Summary of issue raised	Applicant's response
			An Outline Skills, Supply Chain and Employment Plan has been submitted as part of the DCO Application and has been updated in response to previous representations **[REP3-017]**. With specific regard to the Scheme's supply chain, the OSSCEP highlights the following opportunities: • the involvement of local companies in the construction and operation supply chain; • the development and implementation of an inclusive procurement strategy; and • a programme of business networking and support.
REP2-097, REP2-107, REP2-126, REP2-136, REP2-164, REP2-165, REP2-170, REP2-176, REP2-214, REP2-221, REP2-238, REP2-239, REP2-247, REP2-249, REP2-253A, REP2-254, REP2-256, REP2-261, REP2-262	Impact on the horse racing industry	We've no doubt the Scheme would have a detrimental effect on the horseracing industry. If Newmarket wants to remain the world centre of horseracing it can't afford to have Sunnica as its neighbour.	A Horseracing Industry Impact Assessment **[REP2-040]** has been submitted by the Applicant. This concludes that there are no compelling reasons to show that the horseracing industry will be impacted detrimentally in its operations or longer term viability by the construction or operation of the Scheme.
REP2-251	Impact on Ark Church	We are concerned that people would be dissuaded from visiting us and ultimately not become an integral part of the Ark Church should our building be bordered by the Scheme.	An Environmental Impact Assessment has been undertaken in accordance with prescribed guidance and in line with the legislation. This process has been defined to be applicable to a number of different projects at varying scales. The output of the process is the Environmental Statement (ES) which defines the potential environmental effects of a scheme and the proposed mitigation to avoid or reduce potential effects. With the mitigation proposed, the ES demonstrates that the Scheme will not have any 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 is however acknowledged that Scheme will result in residual significant adverse effects upon landscape and visual receptors and heritage assets. However, the Applicant's Environmental Statement found there are no community facilities that would likely

Parties reference	Theme	Summary of issue raised	Applicant's response
			experience a significant effect on their amenity during construction, operation or decommissioning. These findings can be found in Chapter 12 of the Environmental Statement **[APP-044]**.
REP2-251	Impact on Ark Church	The Church is currently able to make use of its surrounds and settings for activities such as summer camps, wedding photos and outdoor recreation.	The Scheme is being developed on private property which is not publicly accessible, this will not change as a result of the Scheme.
REP2-253A	Equestrian industry	Extensive construction works and vehicle movements would impact on visitors and equestrian operatives causing extensive impacts on the equine establishments in the area north and north-east of Newmarket.	A Horseracing Industry Impact Assessment **[REP2-040]** has been submitted by the Applicant. This concludes that there are no compelling reasons to show that the horseracing industry will be impacted detrimentally in its operations or longer term viability by the construction or operation of the Scheme.
REP2-104, REP2-165	Equestrian industry	The Scheme would surround training areas which is not conducive with highly strung horses.	
REP2-098A, REP2-118, REP2-128, REP2-170	Impact on local businesses	We will not visit places of interest/local businesses because we do not want to drive through an industrial landscape.	The Applicant's Environmental Statement found there are no community facilities or businesses that would likely experience a significant effect on their amenity during construction, operation or decommissioning. These findings can be found in Chapter 12 of the Environmental Statement **[APP-044]**. The Applicant considers the Scheme has been designed to take into account the potential impact on the landscape and provided significant embedded mitigation. In addition, the impact is considered acceptable in the context of the importance and benefits that the Scheme will bring. This has been set out in the Statement of Need **[APP-260]**.
REP2-133	Impact on local businesses	Blandings Farm hosts carriage driving events which might stop if the proposed works are in progress which would limit income.	Blandings Farm is located to the west and the south of Sunnica East Site B parcel E19. During operation landscape planting and the grid connection cable route having been reinstated will enable potential impacts on residents, businesses and users of community facilities to be avoided or mitigated.

Parties reference	Theme	Summary of issue raised	Applicant's response
			Chapter 12, Socio-Economics and Land Use **[APP-044]** sets out at paragraph 12.8.32 that there is potential for noise, air quality, visual and traffic effects arising from construction of the Scheme to impact on the amenity of residents, businesses and users of community facilities. Paragraph 12.8.33 goes on to state that taking into account the results of the air quality, noise, traffic and visual assessments, there are no residents, businesses or community facilities that would likely experience a significant effect on their amenity during construction from effects acting in combination.
REP2-126, REP2-253A, REP2-256, REP2-261, REP2-205, REP2-194	Impact on local businesses	The Scheme will have a serious knock-on effect on the local visitor economy which will affect numerous tourism related businesses in the area which rely on the horseracing industry to succeed.	As stated in The Applicant's response to paragraph 12.94 in Chapter 12 of the Applicant's Response to the Local Impact Report **[REP3-019]** as submitted at Deadline 3, The Applicant's EIA Scoping Report **[APP-051]** submitted to PINS contained no specific reference to an assessment of effects on tourism. This is because no specific receptors, such as visitor attractions, had been identified within the defined study areas to justify such an assessment being needed as no significant effects were expected. Chapter 10: Landscape and Visual Amenity of the Environmental Statement **[APP-042]** assessed the impact on visitor views in the vicinity of the Scheme and the loss of long-distance views as relevant. Accordingly, Chapter 12 of the ES **[APP-044]** also assessed impacts on PRoW users which could include visitors to the area. The assessments concluded that there would be no significant effects on these receptors requiring mitigation. Therefore, it is not anticipated that the Scheme will have a serious knock-on effect on the local visitor economy and local tourism related businesses. A Horseracing Industry Impact Assessment **[REP2-040]** has been submitted by the Applicant. This concludes that there are no compelling reasons to show that the horseracing industry will be impacted detrimentally in its operations or longer term viability as a result of the Scheme, and therefore a knock-on effect on business relying on the horseracing industry is not expected.
REP2-097, REP2-128, REP2-170, REP2-208, REP2-253A, REP2-256,	Impact on local businesses	The Scheme will have a knock-on effect on industries that have been set up and supported by the horse racing industry.	A Horseracing Industry Impact Assessment **[REP2-040]** has been submitted by the Applicant. This concludes that there are no compelling reasons to show that the horseracing industry will be impacted detrimentally in its operations or longer term viability as a result of the

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-262, REP2-205, REP2-194			Scheme. No knock-on effect is therefore anticipated for associated industries.
REP2-231	Impact on adjacent uses	The Scheme, if poorly designed and managed, has the potential to impact negatively on the Royal Worlington and Newmarket Golf Club.	Chapter 12: Socio-economics and Land Use of the Environmental Statement **[APP-044]** assesses the Scheme to have a minor adverse impact on golfers at the Royal Worlington Golf Club. This is not considered significant and will comprise of a subtle change to the composition of the existing view. As planting matures, this is anticipated to reduce to a negligible adverse impact by year 15 of operation. Further information on landscape planting is presented in Chapter 10: Landscape and Visual Amenity of the Environmental Statement **[APP-042]**. Extensive mitigation and boundary treatments have been embedded within the Scheme to reduce its visual impact. This includes new woodland planting to the north and east of parcels E24 and E25 to screen the solar structures and additional hedgerow and woodland planting adjacent to Golf Links Road to screen views for motorists and from views from the wider landscape to the north of parcels E30-32. The solar panels within parcels E26-29 have been offset from boundary vegetation to retain the landscape pattern and screen the panels from wider views. The Applicant has set out proposed landscaping in Appendix 10I Outline Landscape and Ecology Management Plan submitted as part of the Environmental Statement **[APP-108]**.
REP2-214, REP2-249, REP2-253A	Impact on local businesses	The economy of the town of Newmarket is dependent on a thriving equine industry.	A Horseracing Industry Impact Assessment **[REP2-040]** has been submitted by the Applicant. This concludes that there are no compelling reasons to show that the horseracing industry will be impacted detrimentally in its operations or longer term viability as a result of the Scheme.
REP2-124, REP2-132	Impact on local businesses	The traffic disruption will severely affect my business.	As stated in The Applicant's response to paragraph 12.48 in Chapter 12 of the Applicant's Response to the Local Impact Report **[REP3-019]** as submitted at Deadline 3, a robust construction management plan will be implemented, with due consideration to be given to the management of construction traffic both in terms of the impact of vehicle movements upon the highway network and highway network users including local businesses to minimise delays and disruption. The Applicant has set out details of its approach to managing impacts from construction in the Framework Construction Traffic Management Plan and Travel Plan **[APP-**

Parties reference	Theme	Summary of issue raised	Applicant's response
			118], the approval and implementation of which is secured via a requirement to the DCO. As a result, no impacts are anticipated, and no associated economic costs are expected.
REP2-161	Impact on local businesses	There will be an impact on La Hogue Farm Shop and café.	As stated in Applicant's Responses to Relevant Representations **[REP1-016]**, Chapter 12: Socio-economics and Land Use of the Environmental Statement **[APP-044]** found that no businesses that would likely experience significant adverse effects during construction or operation. The Applicant revised the design of the Scheme following the statutory consultation to further mitigate the visual impact of the Scheme. The updated Scheme description was submitted as part of the DCO application in Chapter 3 of the ES **[REP2-022]**. Different landscaping treatments have been introduced along the W10 and W11 boundary, which are located in proximity to La Hogue Farm Shop and café to further screen these parcels. Further information on landscaping is presented in Chapter 10: Landscape and Visual Amenity of the ES **[APP-042]**.
REP2-161	Impact on local businesses	There will be an impact on Dane Hill Farm.	As stated in Applicant's Responses to Relevant Representations **[REP1-016]**, Chapter 12: Socio-economics and Land Use of the Environmental Statement **[APP-044]** found that no businesses that would likely experience significant adverse effects during construction or operation. The Applicant revised the design of the Scheme following the statutory consultation to further mitigate the visual impact of the Scheme. The updated Scheme description was submitted as part of the DCO application in Chapter 3 of the ES **[REP2-022]**. There will be significant treatment on the eastern side of W15. Parcel W13 has been removed from solar development and more screening has been proposed at W14. These parcels are located in proximity to Dane Hill Farm and through these measures, will be further screened. Further information on landscaping is presented in Chapter 10: Landscape and Visual Amenity of the ES **[APP-042]**.
REP2-241, REP2-255	Impact on local businesses	Impact on farming operations and jobs during two years of construction	As stated in The Applicant's response to paragraph 12.38 and 12.49 to 12.54 in Chapter 12 of the Applicant's Response to the Local Impact Report **[REP3-019]** as submitted at Deadline 3, the farming sector is currently struggling with meeting labour needs therefore the potential of agricultural worker unemployment resulting from Sunnica is remote.

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			Furthermore, as stated in Appendix J to the Consultation Report **[APP-030]** (regard has to responses to consultation), Chapter 12: Socio-economics and Land Use of the Environmental Statement **[APP-044]** has assessed that there will be no employment loss as a result of the Scheme. There may be some temporary jobs which will not be offered, which is estimated to be two FTE jobs related to agricultural activities (considered equivalent to one permanent job). This possible loss of agricultural employment has been taken into account as deadweight loss of employment during the operation phase.
REP2-183	Equestrian industry	The Scheme will have a negative impact on nearby equestrian businesses as the glare of the Scheme is dangerous for driving horses.	A Horseracing Industry Impact Assessment **[REP2-040]** has been submitted by the Applicant. This concludes the following in relation to glint and glare at paragraphs 5.19 and 5.20. A Glint and Glare Assessment **[APP-121]** has been undertaken. It concludes that reflections from the PV panels to the horseracing industry receptor locations during operation will either not be geometrically possible or will be sufficiently screened. The Applicant has engaged horse behavioural specialists regarding glint and glare. The advice received 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 Limekilns gallops in relation to the solar panels. Therefore, the Scheme will not have an adverse impact on the training/movement of horses by virtue of their potential glint and glare.
REP2-097	Recreation	To ride a horse between two 2.5m high wire mesh fences with solar panels butting up to it on either side would be too dangerous.	The Landscape and Ecology Management Plan **[REP3-011]** includes cross sections as figures 8 to 13 to illustrate how fencing and other elements of the Scheme would be located in the context of retained vegetation (including hedgerows), and proposed planting and fencing. In particular, Figure 10 shows that the proposed solar farm boundary fence adjacent to U6006 would be located at least 13 m from either side of U6006 with existing woodland separating the fence from U6006. Figures 11, 12 and 13 show similar arrangements for proposed permissive path, Elms Road and the Avenue. Therefore, a rider would not feel enclosed by the fencing required by the Scheme, as the 'gap' would be a minimum of 26m wide.

Parties reference	Theme	Summary of issue raised	Applicant's response
			The impact on Non-Motorised Users (NMUs), which includes horse riders on the local road network and PROW, is 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.
REP2-101, REP2-104, REP2-122, REP2-124, REP2-134, REP2-147, REP2-182, REP2-192, REP2-188, REP2-199	Recreation	There will be a loss of residential amenity due to the closure of roads and footpaths.	Chapter 12: Socio-economics and Land Use of the Environmental Statement **[APP-044]** has assessed the impact of the scheme on PRoW. The scheme has been designed to minimise the number and duration of PRoW closures, including along the cable route. If closure of routes is required then as a worst-case scenario, it has been assumed that the PRoW would be closed for no more than three weeks, and therefore not considered to have a significant or long term impact.
REP2-253A	PROWs	There will be harm to recreation and rights of way.	Chapter 12: Socio-economics and Land Use of the Environmental Statement **[APP-044]** has assessed the impact of the scheme on PRoW. The scheme has been designed to minimise the number and duration of PRoW closures, including along the cable route. If closure of routes is required then as a worst-case scenario, it has been assumed that the PRoW would be closed for no more than three weeks, and therefore not considered to have a significant or long term impact.
REP2-097, REP2-238	PROWs	The bridleway along Green Lane will be covered in solar panels on either side which means I will not use it anymore because it will be dangerous.	The Landscape and Ecology Management Plan **[REP3-011]** includes cross sections as figures 8 to 13 to illustrate how fencing and other elements of the Scheme would be located in the context of retained vegetation (including hedgerows), and proposed planting and fencing. In particular, Figure 10 shows that the proposed solar farm boundary fence adjacent to U6006 would be located at least 13 m from either side of U6006 with existing woodland separating the fence from U6006. Therefore, users of the bridleway will not be in close proximity to the solar panels.
REP2-221, REP2-236	PROWs	The PROW between Snailwell and the Limekilns will be closed during construction. This is one of the only dog walking routes available in Newmarket during	The scheme has been designed to minimise the number and duration of PRoW closures, including along the cable route. If closure of routes is required then as a worst-case scenario, it has been assumed that the PRoW would be closed for no more than three weeks, and therefore not considered to have a significant or long term impact.

Parties reference	Theme	Summary of issue raised	Applicant's response
		the mornings as the gallops are all in use.	
REP2-247	PROWs	The experience of the landscape for those travelling along the footpath network and minor roads will be impacted by East Sites A and B will be significantly changed. The adverse effect being particularly great where the solar panels will be on both sides of the highway between Freckenham and Red Lodge, and between Isleham and Freckenham.	The Landscape and Visual Impact Assessment summarised in Chapter 10 of the ES **[APP-042]** acknowledges that there will be some significant visual effects relating to people using public rights of way in the construction, operation and decommissioning of the Scheme on visual receptors. However, none of these effects will be significant by year 15 of operation, when planting proposed as mitigation will have established. The main road connecting Mildenhall to the north east and Fordham via Freckenham to the south west. The closest area of solar panel arrays to the B1102 will be within parcel E12 in Sunnica East Site A. These panels would be visible for a short section of approximately 250m of the route on leaving the village travelling west in oblique views to the south, approximately 570m away beyond the new native grassland in ECO3 and a hedgerow along the edge of the parcel. Existing vegetation and buildings would screen views further west. These views are illustrated by the photomontages shown in Figure 10-94 [**APP-224**]. A section of Golf Links Road between the A11 trunk road and the Royal Worlington and Newmarket Golf Courses would lie adjacent to parcels E30, E31 and E32. Golf Links Road is lined by mature vegetation and recent planting on its southern side. This vegetation will be further strengthened by a belt of woodland running parallel with the road, screening the solar farm development in oblique views along the narrow lane. Views across parcels E24 and E25 on entering Worlington along Newmarket Road from the south would be more open in the early years of operation due to the slight rise in topography. Woodland planting, connecting with existing woodland blocks to the west would integrate and screen these panels by year 15 of operation. Panels in parcels E26 and E28 would be screened by the existing dense woodland which lines the road.
REP2-247	PROWs	Those using footpath links between Badingham and Red Lodge and Worlington will be impacted as the open aspects	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.

Parties reference	Theme	Summary of issue raised	Applicant's response
		with far reaching views currently enjoyed will be replaced by views of boundary fencing on either one or both sides.	Accordingly, Chapter 12: Socio-economics of the ES **[APP-044]** also assessed the effects on views and use of PRoWs. The Applicant does note that some routes previously surrounded by agricultural fields will now border the Scheme. This could lead to impacts on the amenity value of these resources to their users, however, the impact is not considered to be enough to lead to a reduction in the number of users along the routes. Where solar farm infrastructure would be in close proximity to sections of roads, 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.
REP2-137	PROWs	The submitted details seriously lack rigorous attention to policy requirements for PROWs. As a result of this, the proposed scheme design is insensitive to, and fails to respond to, wider community needs for better walking and cycling routes.	The Applicant disagrees. There are three permissive routes which are incorporated into the design and illustrated on Figure 3-10 (indicative location shown, the final location subject to landowner agreement) which will be secured through Appendix 10I: OLEMP of the Environmental Statement **[REP3-011]**. These permissive paths will enable increased public access across the landscape of the local area and thus respond positively to local GI strategy and local planning policies relating to rights of way. The paths proposed are: • 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; • 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 • 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.
REP2-137	PROWs	The characterisation of existing walking and cycling routes by	At the time of producing the Transport Assessment **[APP-117]**, it was not considered representative or valid to undertake surveys of the PRoW due

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		the Applicant is inaccurate. It does not take into account actual use by significant numbers of walkers and cyclists. Nor does it consider latent demand where the very absence of facilities and narrow carriageways discourage use. It also overstates the availability of safe and attractive walking and cycling routes.	to the pandemic and therefore it was not possible to accurately quantify the number of Non Motorised Users (NMU). However, this does not mean that an assessment was not undertaken. An EIA assessment of the impact of the scheme on Non-Motorised Users was undertaken from a range of perspectives, including the effect of temporary PRoW closures as presented in paragraphs 13.8.62 to 13.8.65, 13.8.128 to 13.8.131, 13.8.159 to 13.8.162 and 13.8.241 to 13.8.245 within the Transport and Access chapter of the ES **[APP-045]**, which is also discussed in the Transport Assessment **[APP-117]** and also Chapter 6 of the Framework Construction Traffic Management Plan and Travel Plan **[AS-300, AS-301]**. Based on the locations of the routes, including the destinations that they serve, it was considered reasonable to base an assessment on the likelihood that there will be some Non-Motorised Users (NMUs), but it was concluded that levels would not be so substantial that a temporary closure for three weeks would be classified as a significant adverse effect in EIA terms. This is particularly the case as the routes in question are likely to be mostly used as leisure routes, of which there are a range of alternatives in the locality. To provide further confidence to this conclusion, PRoW surveys were carried out in July 2022 to capture the existing usage of the PRoW that are proposed to be temporarily closed. The results of the PRoW surveys identified a low number of daily users of the PRoWs. As a result, and taking account of the July 2022 surveys, the conclusion presented in the Transport Assessment and Transport and Access chapter of the ES **[APP-117]** remains unchanged and it was concluded that there would be no significant adverse impact on NMUs as a result of the PRoW closures during the construction period. The ES methodology incorporates existing NMU facilities and desire lines, i.e. where people want to travel to and from, regardless of facilities. This is included in the Link Sensitivity part of the methodology, which informs the assessment of impacts in terms of significance of effects. This is set out within Transport and Access chapter of the ES **[APP-045]**. The Councils raised questions on Link Sensitivity, including in terms of NMUs, in the Local Impact Report. The Applicant has prepared a technical note in

Parties reference	Theme	Summary of issue raised	Applicant's response
			response to SCCs suggested link classifications which is provided as an Appendix to the LIR response. The Applicant's position is that the link sensitivity classifications set out in the Transport and Access ES Chapter **[APP-045]** remain robust and accurate in line with the IEMA Guidance. Notwithstanding this, the Technical Note reviews comprehensively SCC's rationale for the change in link sensitivity, including highlighting the potential change to classification of effect and therefore significance in EIA terms. There would not be any new significant effects or further mitigation requirements as a result of this analysis.
REP2-137	PROWs	Schedule 8 of the DCO Works, land over which the applicant seeks rights rather than ownership does not provide for public permissive access routes. This is felt to be a fundamental flaw in the draft DCO.	The permissive paths are required to be provided pursuant to Requirement 21 in Schedule 2 of the draft DCO. Rights with respect to permissive paths are not included in Schedule 8 as the permissive paths are proposed to be provided over the parts of the Order limits where powers for compulsory acquisition of land are sought pursuant to Article 18 (rather than rights pursuant to Article 20, which is what Schedule 8 relates to).
REP2-137	PROWs	The applicant's Design and Access Statement (EN010106/APP/7.3) includes a section 1.2 on "Flexibility of the design". There is however no indication of flexibility being offered in relation to the incorporation of walking and cycling routes within the DCO boundary.	There are three permissive routes which are incorporated into the design and illustrated on Figure 3-10 (indicative location shown and the final location is subject to landowner agreement), which will be secured through Appendix 10I: OLEMP of the Environmental Statement **[REP3-011]** and requirement 21 of Schedule 2 of the draft DCO.
REP2-137	PROWs	The Scheme is not compliant with the policies requiring attention to improved access for walking and cycling. Whilst some routes are incorporated, there is no evidence that these	The Applicant disagrees. There are three permissive routes which are incorporated into the design and illustrated on Figure 3-10 (indicative location shown, the final location subject to landowner agreement) which will be secured through Appendix 10I: OLEMP of the Environmental Statement **[REP3-011]** and requirement 21 in Schedule 2 of the draft DCO. These permissive paths will enable increased public access across

Parties reference	Theme	Summary of issue raised	Applicant's response
		have been generated by any comprehensive assessment of walking routes in the area and the greater opportunities that exist for more meaningful improvements.	the landscape of the local area and thus respond positively to local GI strategy and local planning policies relating to rights of way. The paths proposed are: • 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; • 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 • 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.
REP2-137	PROWs	The 'potential' 0.7-mile route along Beck Road has some value as it links to bridleway W-257/002/X towards Worlington. However, the amenity is limited by it being alongside the road and an alternative preferred route is suggested linking to East Fen Drove Isleham.	The permissive routes have been determined based on operational, environmental and land owner constraints. The Applicant considers the permissive routes provide connectivity and alternative routes within the study area.
REP2-137	PROWs	The potential 0.3-mile route west of Green Lane Worlington doesn't appear to go anywhere other than giving access to the native grassland planting area ECO3.	This is correct, this permissive route connects to the U6006 and provides a circular route through ECO3.
REP2-137	PROWs	The Applicant's potential 0.6-mile link west of Golf Links Road Worlington offers amenity value as part of a short circular walk,	Noted, with thanks.

Parties reference	Theme	Summary of issue raised	Applicant's response
		or cutting the corner for pedestrians and cyclists travelling between Green Lane and Golf Links Road.	
REP2-137	PROWs	The Applicant's potential 0.4-mile route south-west of Elms Road to Badlingham Manor would have limited value. It would run parallel to and duplicate the route along Badlingham Road just 250 metres away. Badlingham Road at this point is single track with hedgerows and verges. It is very low traffic and one of just a few routes attractive to walkers and cyclists.	The proposed permissive path provides a link from 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. Badlingham Road is not a PRoW and can be used by vehicles, therefore the permissive path offers an alternative, safer route.
REP2-137	PROWs	Taken together, the Applicant's 'potential' permissive routes total 2.0 miles. To put this in context, this is on a DCO site that overall stretches 12.0 miles through the site from west to east; and 6.8 miles through the site north to south. The Applicant's mitigation is considered woefully inadequate in this context.	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 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; • 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 • 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.
REP2-137	PROWs	The Applicant should include additional mitigation routes	The permissive routes have been determined based on operational, environmental and land owner constraints. The Applicant considers the

Parties reference	Theme	Summary of issue raised	Applicant's response
		which would solve missing linear north-south and east-west gaps in the walking and cycling network. They would also afford greater opportunity for local circular walks from 15 local settlements. 3.20 These include a suggested route from East Fen Road Isleham to Beck Road would be 1.2 miles and a suggested route linking Broads Road Burwell to Heath Farm Road Red Lodge would be 7.9 miles long.	permissive routes provide connectivity and alternative routes within the study area.
REP2-137	PROWs	At the Red Lodge end, the current Scheme is for the cable to pass underground below the River Kennet at approximately grid point 52°18.342'N, 0°28.253'E. It is suggested that a footbridge is provided at this point to solve a significant local access problem	The permissive routes have been determined based on operational, environmental and land owner constraints. The Applicant considers the permissive routes provide connectivity and alternative routes within the study area. Providing a bridge to address an existing local access problem is beyond the scope of the Scheme.
REP2-238	Permissive routes	3 permissive routes will be created. It is unclear from the documentation: • Where exactly these routes will run to and from. The maps referenced do not clearly show the specified routes. • What designation the 'permissive route' will have. It is essential that equestrians are seriously included within the design and specifically of these	The paths proposed are: • 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; • 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

Parties reference	Theme	Summary of issue raised	Applicant's response
		routes and thus they are designated as a bridleway as a minimum. • Why these routes will be 'permissive' and not dedicated routes. A permissive route can be closed/removed at any time, therefore the expectation with a development such as this would be that additional PROW created to safeguard its existent in perpetuity. • The north / south section of the proposed potential provision of permissive route on Sunnica West Site A is already subject to a DMMO that BHS will be submitting shortly, there is evidence that this used to be a road with public access. Beck Road in Isleham looks to be made to a permissive route, this is a road and as such should always be a road, need some clarification on this.	• 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. 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 **[REP2-012]**. The Permissive Paths are not intended to be a public highway, as they will be removed upon decommissioning in order for the land to be returned to landowners. Requirement 21 of the draft DCO **[REP2-012]** requires the approval by the relevant planning authority 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. The permissive path within Sunnica West A was removed following landowner discussions after the statutory consultation stage. Therefore, there is no permissive path within Sunnica West Site A. The permissive path within Sunnica East Site A is adjacent to Beck Road and not the actual road itself.
REP2-196	PROWs	The removal of footpaths will mean people are less likely to take exercise and enjoy the local countryside, which has been so important to many, especially in the recent months of lockdown.	As stated in The Applicant's Responses to Individual Written Representations by Ramblers, Newmarket and District Group **[WR-122]**, the Scheme has been designed to minimise the number and duration of PRoW closures, including along the cable route. If closure of routes is required then as a worst-case scenario, it has been assumed that the PRoW would be closed for no more than three weeks, and therefore not considered to have a significant or long term impact. Chapter 12: Socio-economics of the ES **[APP-044]** explains that all of the PRoWs that are closed temporarily during the construction phase will be re-opened during the operational phase.

Parties reference	Theme	Summary of issue raised	Applicant's response
			There is no permanent removal of footpaths.
REP2-236	PROWs	There are only four reasonable walks in Freckenham, all will be impacted by the Scheme: three will be closed for part or all of the construction period: the bridleway section of Mortimer Lane [W-257/002/X] for soil stripping of the highly productive ECO2 for acid grassland mitigation; the lower part of Blanding's Farm footpath [W257/003/0] for cabling; and the central section of U6006-Badlingham Lane for construction traffic and underground cabling, which may result in destruction of its trees and hedgerows, as all vegetation above cable corridors must be cleared to prevent root penetration.	The Framework Construction Traffic Management Plan and Travel Plan **[REP3-013]** identifies the eight PRoWs which are required to be temporarily closed during the construction period. These closures only relate the construction of the Grid Connection Routes A and B and will be for a maximum of 3 weeks. An Arboricultural Impact Assessment **[REP3-21]** has been prepared and submitted at Deadline 3 which provides details of tree loss and tree root protection.
REP2-236	PROWs	The Applicant intends to close the central section of Badlingham Lane 450m from the Worlington entrance and 700m from the Freckenham entrance, for an undefined period but is likely to be for the entire construction period, to allow for cable crossings and cabling along a large part of its length.	This is incorrect, the U6006 (Badlingham Lane) will be closed for a maximum of seven days. See 3.6.19 of Chapter 3: Scheme Description **[REP2-022].**

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REP2-200	PROWs	There won't be any remaining tracks and fields separated from the roads, the Scheme will remove what few bridleways we have.	This is incorrect. The Framework Construction Traffic Management Plan and Travel Plan **[REP3-013]** identifies the eight PRoWs which are required to be temporarily closed during the construction period. These closures only relate the construction of the Grid Connection Routes A and B and will be for a maximum of 3 weeks. No bridleways will be removed.
REP2-120	Lighting	Locally, the Scheme could negate the major investment in shielded LED streetlighting which has been made by Cambridgeshire County Council and which has significantly darkened the county's skies, made stars visible again and reduced sky-glow in the nightscape.	There is no permanent lighting requirement for the Scheme. • Construction: o During winter months, mobile lighting towers with a power output of 8kVAs will be used to assist construction works. • Operation: o 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.
REP2-247	Limekilns	There are footpaths across the Limekilns which are open to the general public when the area is not being used by the horse racing industry. The visual amenity of those accessing these footpaths, as well as those using the Limekilns for exercising of racehorses, will be impacted by the proposed 256ha West Site A which due to its scale and the topography will render it incapable of meaningful mitigation.	The Landscape and Visual Impact Assessment summarised in Chapter 10 of the ES **[APP-042]** has assessed impacts on the on peoples' views of the landscape and their visual amenity. Intervisibility between the Scheme and Newmarket will be limited to LLCA 26, due to its openness and sloping aspect. The Scheme will be visible from the Limekilns Gallops, as evidenced in the photomontage presented in Figure 10-100 **[APP-230]** and the Applicant has assessed the residual visual effects to be moderate adverse at year 15 of operation, which is significant. Views of Ely Cathedral, which are difficult to perceive with the naked eye, will be preserved. As no part of the Scheme falls within LLCA 26, impacts on its character relate to its setting, which is defined in part by the site but also includes the busy A14 and A11 trunk roads and railway lines. The key characteristics listed in Appendix 10E **[APP-104]** would remain and the significance of effect has been assessed as minor adverse by year 15 of operation.
REP2-238	PROWs	The Applicant is not proposing mitigation or diversions for bridleways that are temporarily closed during construction.	The Scheme has been designed to minimise the number and duration of PRoW closures, including along the cable route. If closure of routes is required then as a worst-case scenario, it has been assumed that the PRoW would be closed for no more than three weeks, and therefore not

Parties reference	Theme	Summary of issue raised	Applicant's response
			considered to have a significant or long term impact. Therefore, diversions of bridleways are not required for the three weeks closure.
REP2-238	PROWs	It is essential that mitigation is put in place for all PROW, including those directly affected by the development, during the construction phase, and to ensure adequate reinstatement post construction and those indirectly affected by the development, to ensure that equestrians can still use the routes safely with construction works going on in close proximity.	The Framework CEMP **[REP3-015]** includes a requirement for a condition survey to be undertaken of all PRoW prior to closure and for the PRoW to be restored to their previous condition following any closure. The Framework CEMP **[REP3-015]** also includes other measures to protect equestrian users such as: • All members of the construction work force and visitors will be made aware of the equestrian routes or areas affected by the construction of the Scheme; • 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; • A point of contact will be available within the Contractor to liaise with the horse racing and training community and other neighbours; and • The Communication Strategy will also provide details of timings and durations of construction works.
REP2-139	PROWs	The temporary closure of Mortimer Lane during construction will have a significant impact on local people's ability to get around on foot, particularly from Freckenham to Isleham.	The Scheme has been designed to minimise the number and duration of PRoW closures, including along the cable route. If closure of routes is required then as a worst-case scenario, it has been assumed that the PRoW would be closed for no more than three weeks, and therefore not considered to have a significant or long term impact.
REP2-139	PROWs	The righthand permissive path is within or on the edge of the Order limits and will be subject to all the inconveniences of construction, visually, aurally	The permissive path will only be open to the public during the operational phase of the Scheme and therefore, users will not be subject to constructions impacts.

Parties reference	Theme	Summary of issue raised	Applicant's response
		and in polluted air; the route exits onto the busy Newmarket Road, which is without footways until it reaches Lark Close just before The Walnut Tree pub, so is potentially dangerous for pedestrians, dog walkers and horse riders.	
REP2-139	PROWs	The lefthand permissive path appears to create a short circular route skirting Manor Farm or Reeder's stables school, returning to Badlingham Lane close to the point destined for the upper cable crossing, in full view of works and very distressing for people who value the mature trees and the bats they support.	The permissive path will only be open to the public during the operational phase of the Scheme. The permissive path offers a circular route to users within ECO3. The permissive path will not result in any tree loss or result on any impacts on bats.
REP2-139	PROWs	Permissive paths are dependent on the goodwill of the landowners and could be withdrawn at any time, thus there is no guarantee they will remain available for the full 24 months.	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 **[REP2-012]**. The Permissive Paths are not intended to be a public highway. Requirement 21 of the draft DCO **[REP2-012]** requires the approval by the relevant planning authority of the details of the permissive paths, including their specification and maintenance regime, prior to their construction and requires the permissive paths to made available for public use before the final commissioning of the phase of the development to which they relate.
REP2-139	PROWs	A permissive path is proposed for close to Blandings Farm, taking a rectangular course parallel with Badlingham Road presumably with the idea of linking into Blanding's Farm path. It has no practical function	The proposed permissive path provides a from link from 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. The permissive path offers an alternative, safer route than walking from Red Lodge along Elms Road to the U6006.

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		as it runs partly along the busy Elms Road then alongside construction works on Plot E19 with attendant dust and noise, which could dangerously spook horses into bolting onto Elms Road.	The permissive path will only be open to the public during the operational phase of the Scheme.
REP2-120	PROWs	We are concerned at how safe the PROW network will be, especially for children and horse riders. It is one thing to fall or be thrown from a galloping horse onto a grassy sward. It is quite another to hit a metal security fence, a metal and silicon solar panel or to be tossed into high voltage electricity.	The perimeter fence and solar panels will be offset from the PRoWs and they will be behind the proposed planting, therefore the likelihood of the events occurring as mentioned in the comment are very low.
REP2-202	PROWs	If the Scheme goes ahead, ancient trees and landscapes would be destroyed to allow access through our quaint roads and footpaths, which we all enjoy and love along with much valued wildlife.	As stated in The Applicant's Responses to Relevant Representations **[REP1-016]**, no ancient woodland or other irreplaceable habitats will be affected by the Scheme. The Landscape and Ecology Management Plan **[REP3-012]** includes provision for the successful establishment and future management of biodiversity and landscaping works. It also forms part of the strategy for successfully integrating the Scheme within the existing landscape, as well as mitigating many of the related impacts identified within the Environmental Statement.
REP2-238	PROWs	Closing of the Snailwell bridleway (204/5) is not feasible, the throughflow of walkers cyclists and horse riders with no alternative route apart from very busy roads would be dangerous, especially when those roads would have a much higher HGV rate on them through Scheme	Snailwell bridleway (204/5) will not be closed as a result of the Scheme.

Parties reference	Theme	Summary of issue raised	Applicant's response
		deliveries etc. What are their proposals for an alternative as they do need one?	
REP2-238	Historic routes	There are historic routes which do not currently appear on the definitive map which need consideration. There are a considerable number of these across all parishes affected by the development. Definitive Map Modification Orders are being submitted for these routes immediately, and thus must be considered throughout the planning phase of this proposed development.	The Environmental Statement has assessed the available current information contained within the Definitive Maps of Public Rights of Way, as provided by the Local Planning Authorities.
REP2-097, REP2-107, REP2-121, REP2-152, REP2-230	Employment	The Scheme will have a negative impact on farming jobs by removing agricultural land from production.	As stated in The Applicant's Responses to Relevant Representations **[REP1-016]**, 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. 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.
REP2-208	Skills and training	Statements made about training of apprentices, staff and skilled jobs are all unbelievable.	The Applicant's response to paragraphs 12.27 to 12.33 in Chapter 12 of the Applicant's Response to the Local Impact Report **[REP3-019]** as submitted at Deadline 3 explains that An Outline Skills, Supply Chain and Employment Plan has been submitted as part of the DCO Application and has been updated in response to previous representations **[REP3-017]**.

Parties reference	Theme	Summary of issue raised	Applicant's response
			With specific regard to employment, skills and education, the opportunities for this that the OSSCEP highlights are: • a programme of activities for schoolchildren and young people which promote science, technology, engineering, and mathematics ('STEM') education and careers. • The ability of local residents to access employment opportunities associated with the construction and operation of the Scheme, including apprenticeships. • the potential for interventions to support the training of employees and workers on the Scheme. • the potential for implementing initiatives to maximise the diversity of the workforce. The OSSCEP forms an outline basis that can be further developed into a full Skills Plan to deliver positive outcomes and mitigation for the Scheme, subject to approval of the plan by the relevant planning authorities. Specific measures such as those referred to in the LIR and WR can be discussed, confirmed and, where appropriate and acceptable, agreed in this detailed skills, supply chain and employment plan approved pursuant to requirement 21.
REP2-104, REP2-105, REP2-106, REP2-107, REP2-118, REP2-120, REP2-121, REP2-123, REP2-124, REP2-133, REP2-183, REP2-196, REP2-201, REP2-253A	Residential amenity	The Scheme will have a huge impact on residential amenity, especially as residents have chosen to live in a rural setting.	Chapter 12: Socio-economics and Land Use of the Environmental Statement **[APP-044]** found there are no residents, community facilities or businesses that would likely experience a significant effect on their amenity during construction, operation or decommissioning. An Environmental Impact Assessment has been undertaken in accordance with prescribed guidance and in line with the legislation. This process has been defined to be applicable to a number of different projects at varying scales. The output of the process is the Environmental Statement (ES) which defines the potential environmental effects of a Scheme and the proposed mitigation to avoid or reduce potential effects. With the mitigation proposed, the ES demonstrates that the Scheme will not have any 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 is however acknowledged that Scheme will

Parties reference	Theme	Summary of issue raised	Applicant's response
			result in residual significant adverse effects upon landscape and visual receptors and heritage assets. The Scheme has been designed to take into account the potential impact on the landscape and provided significant embedded mitigation. The Applicant's response to paragraphs 12.63 and 12.86 in Chapter 12 of the Applicant's Response to the Local Impact Report **[REP3-019]** as submitted at Deadline 3, provides details of the mitigation measures to minimise the Scheme's impact on each of the individual community areas. In addition, the impact is considered acceptable in the context of the importance and benefits that the Scheme will bring. This has been set out in the Statement of Need **[APP-260]**.
REP2-104, REP2-107, REP2-118, REP2-124, REP2-128, REP2-224	Residential amenity	Many people will leave the surrounding villages/or choose not to locate to the area should the Scheme get consent.	The Applicant respectfully disagrees with this comment. 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 or industrialising. Chapter 12: Socio-economics and Land Use of the Environmental Statement **[APP-044]** found there are no residents, community facilities or businesses that would likely experience a significant effect on their amenity during construction, operation or decommissioning. On this basis, the Applicant sees no reason why the Scheme should be seen as the specific reason why people would leave villages.
REP2-104	Residential amenity	Much social activity in neighbouring villages depends on the natural landscape, such as running, fishing, walking groups, allotments, riding.	Noted. The Scheme is not anticipated to restrict such activities.
REP2-119, REP2-254	Residential amenity	It will be like living in a construction site.	The Applicant respectively disagrees.
REP2-104, REP2-107, REP2-126, REP2-249, REP2-253A, REP2-254	Tourism	The Scheme would have a negative impact on the tourism sector due to its impact on the horse racing industry.	The Applicant's response to paragraphs 12.42, 12.76 to 12.79, 12.89 and 12.90 in Chapter 12 of the Applicant's Response to the Local Impact Report **[REP3-019]** as submitted at Deadline 3 explains that a Horseracing Industry Impact Assessment **[REP2-040]** has been submitted by the Applicant. This concludes that there are no compelling reasons to show that the horseracing industry will be impacted detrimentally in its

Parties reference	Theme	Summary of issue raised	Applicant's response
			operations or longer term viability by the Scheme. See the Applicant's response to paragraphs 12.42, 12.76 to 12.79, 12.89 and 12.90 in Chapter 12 of the Applicant's Response to the Local Impact Report **[REP3-019]** as submitted at Deadline 3 for further details on the measures taken by the Applicant to address concerns relating to the horse racing industry.
REP2-120	Safety	Will fences be properly maintained so as to prevent wandering children and bored teenagers from entering an exciting enclosure humming with electrical energy?	As stated in The Applicant's Responses to Relevant Representations **[REP1-016]**, 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.
REP2-238	Mitigation	Along routes there needs to be a 6m wide section for all multi-users to have access, the surface needs to be adequate for all users (not tarmac). The screen from the glint of the panels needs to be 3m tall to adequately protect riders and horse. How will this look? Our beautiful green spaces that we ride in will look very different.	Requirement 21 of the draft DCO **[REP2-012]** requires the approval by the relevant planning authority of the details of the permissive paths, including their specification and maintenance regime, prior to their construction and requires the permissive paths to made available for public use before the final commissioning of the phase of the development to which they relate.
REP2-120	Safety	If an accident does occur, how will emergency services safely access any injured persons in remote areas of the sites? It will not be possible for MAGPAS to safely land the emergency helicopter on a sea of silicon and metal.	As stated in The Applicant's Responses to Relevant Representations **[REP1-016]**, in total there are 35 site accesses across the Scheme that will provide access into/out of the Scheme, which includes for 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 **[AS-312]**. 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, *'a sufficient number of suitable emergency routes*

Parties reference	Theme	Summary of issue raised	Applicant's response
			and exits must be provided to enable any person to reach a place of safety quickly in the event of danger'.
REP2-160, REP2-230	Impact on local businesses	Businesses will move away from the local area because of the Scheme.	As stated in The Applicant's Responses to Relevant Representations **[REP1-016]**, 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. 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.
REP2-165	PROWs	The inclusion of a walking route alongside the boundary of Brookside Stud has no consideration for potential impacts on the way the Stud uses the land for grazing horses.	The permissive path which runs along E19 will be within the Order limits and will be separated from the Brookside Stud by existing planting. It is not anticipated that there will be any impact on the grazing areas utilised by the Stud.
REP2-230	Ownership	The Scheme may be sold on to a foreign buyer with little to no knowledge of the area. Such buyers pay little to no tax in the UK, negating any benefits to the national economy.	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. Furthermore, Sunnica Ltd is registered in the United Kingdom as company 08826077. It is therefore subject to UK regulation and taxation.
REP2-243	Ownership	The Applicant is not a UK company and therefore money raised from the government for the Scheme will go straight to a non-UK entity.	As stated in The Applicant's Responses to Relevant Representations **[REP1-016]**, 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

Parties reference	Theme	Summary of issue raised	Applicant's response
			DCO application. Sunnica Ltd is registered in the United Kingdom as company 08826077. It is therefore subject to UK regulation and taxation.
REP2-168, REP2-238	PROWs	The Icknield Way will be closed along much of its route during construction or impassable due to construction traffic. This will impact local people and tourists. The Applicant is not proposing an alternative to this.	As stated in The Applicant's Responses to Relevant Representations **[REP1-016]**, the formal Icknield Way trail passes some 2km to the east of the Scheme. 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 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.
REP2-235	Compensation	Who will compensate us for the loss of property values, productive farmland, jobs and loss of business?	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. 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. 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.
REP2-175	Equestrian industry	The ExA should visit the Jockey Club Rooms to understand the importance of horseracing in Newmarket.	This is a matter for the ExA.
REP2-238	Horse recreation	The surfacing left on PROWs and dust will have a negative impact on horses.	The Framework CEMP **[REP3-015]** includes a requirement for a condition survey to be undertaken of all PRoW prior to closure and for the PRoW to

Parties reference	Theme	Summary of issue raised	Applicant's response
			be restored to their previous condition following any closure. Therefore, there should not be any impact on the surfacing of PRoWs.
REP2-238	Equestrian	During construction and after where is it proposed that horses from local yards are ridden?	Chapter 12: Socio-economics and Land Use of the Environmental Statement **[APP-044]** has assessed the impact of the Scheme on PRoW. The Scheme has been designed to minimise the number and duration of PRoW closures, including along the cable route. If closure of routes is required then, as a worst-case scenario, it has been assumed that the PRoW would be closed for no more than three weeks, and therefore not considered to have a significant or long term impact.
REP2-241	PROWs	It is no longer safe to walk, run, cycle or ride horses on rural roads, making PROWs important.	Noted. The Scheme has proposed three permissive paths to increase access for non-road users within the Order limits.
REP2-238	PROWs	Green Lane will be tarmacked and unsuitable for riding horses.	It is assumed that this refers to the U6006. There will be no tarmacking of any existing PRoWs or new permissive paths.

5.17 Theme 17 – Environment – Transport

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-097, REP2-101, REP2-107, REP2-108, REP2-116REP2-116, REP2-119, REP2-125, REP2-133, REP2-136, REP2-139, REP2-142, REP2-145, REP2-146, REP2-147, REP2-156, REP2-157, REP2-166, REP2-169, REP2-172, REP2-173, REP2-174, REP2-177, REP2-178, REP2-182, REP2-189, REP2-192, REP2-197, REP2-202, REP2-208, REP2-222, REP2-233, REP2-234, REP2-236, REP2-238, REP2-239, REP2-242REP2-241, REP2-242, REP2-253A, REP2-256, REP2-258, REP2-262, REP2-184, REP2-216, REP2-209, REP2-213	Construction	Local road infrastructure is unsuitable for the construction period. Most access roads are small B roads (or single track), routing through villages.	Swept path analysis has been undertaken for HGVs and Abnormal indivisible Loads (AILs) and are provided within the Framework Construction Traffic Management Plan and Travel Plan [**REP3-013**]. Chapter 7 (paragraph 7.2.14) of the Framework Construction Traffic Management Plan and Travel Plan [**REP3-013**] includes a requirement to undertake conditional surveys before, during and after construction to identify any impacts which are as a result of the development that need to be remediated. Where the pre-condition survey identifies that there would be a benefit to having appropriate measures in place to protect or maintain the road surface, to reduce the likelihood of damage caused by construction vehicles, the applicant will enter discussions with the LHA on this matter. The temporary measures required to accommodate the movements of the AILs are identified within Framework Construction Traffic Management Plan and Travel Plan [**REP3-013**] with physical measures including temporary removal and subsequent re-instatement of street furniture to accommodate the swept path of the AILs where it overhangs the verge referenced throughout Chapter 5. Any necessary temporary alterations of layout are reflected in Part 2 of Schedule 5 to the draft DCO [**REP2-012**] to be carried out at the corresponding locations shown on Access and Rights of Way Plans [**REP2-006**]. No permanent physical mitigation works are required. The measures set out in the Framework Construction Traffic Management Plan and Travel Plan are secured under the draft DCO - Requirement 16 in Schedule 2 to the draft DCO, which requires the relevant authority's approval of the CTMP before the commencement of the development, and the CTMP must be substantially in accordance with the Framework.

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-138	Construction	Construction traffic will make Fordham less safe.	Table 13-33 in the Transport and Access chapter of the ES [**APP-045**] details that peak construction period traffic will not result in significant effects for vehicle travellers in terms of driver delay, accidents and safety. In addition, the peak construction traffic will not result in significant effects on Non-Motorised Users (NMUs) in terms of severance, pedestrian delay, pedestrian/cycle amenity, fear and intimidation and accidents and safety.
REP2-116REP2-116, REP2-258,	Construction	Construction traffic will badly affect those living in Worlington as this is part of the route to East Site A.	The construction of the scheme will result in additional traffic on the local highway network during the construction period. The impact on the local highway network will therefore be a short term and temporary impact. The Transport Assessment [**APP-117**] and the Transport and Access chapter of the ES [**APP-045**] assesses the peak of the construction phase. Chapter 7 of the Framework Construction Traffic Management Plan and Travel Plan [**REP3-013**] sets out significant embedded mitigation, including measures to control the arrival and departure of HGVs for the site. As part of the embedded mitigation for the scheme, the construction staff will travel to / from the site outside of the highway network peak hours in order to avoid peak time capacity impacts, representing an efficient use of the highways network. The working hours are secured under the draft DCO, with reference to requirement 14 which secures the measures contained in the Framework Construction Environmental Management Plan [**REP3-015**]. As illustrated in Plates 2 and 3 in the Transport Assessment [**APP-117**], It is forecast that on average there will be 11 HGV deliveries (22 vehicle movements) per day to Sunnica East Site A during the construction phase. The peak HGV deliveries are forecast to occur in month 14 with 21 HGV deliveries per day (42 movements). There will be a 10 hour typical construction delivery window, with movements split equally across the hours (excluding the two highway peak hours and noting that there will be more arrivals at the start of the day and departures towards the end), it would be anticipated on average to be circa two HGV movements in an hour for the Sunnica East Site A and four HGV movements in an hour during the peak month of activity. The Applicant has agreed with the local highway authority to escort HGVs through the Newmarket Road/Freckenham Road T-Junction within Worlington to safe passage of vehicles and the safety of the public. Swept

Parties reference	Theme	Summary of issue raised	Applicant's response
			path analysis of HGV routes are provided within the Framework Construction Traffic Management Plan and Travel Plan [**REP3-013**] and Abnormal Indivisible Loads (AIL) are not proposed to use the T-Junction within Worlington.
REP2-139, REP2-238	Construction	Road closures have a significant impact on people driving in the area. Claims about the short length of road closures during construction are overly optimistic.	Each of the road closures are associated with the construction of a site access or the construction of the grid connection. The road closures are identified to ensure the safety of the construction workers and public. Each of the temporary road closures are expected to be no longer than one-week and are only in locations where the use of two-way signals is not possible. Wherever possible, emergency vehicles, pedestrians and cyclists will be permitted to travel in both directions through the road closure. This has been included in the updated Construction Traffic Management Plan and Travel Plan [**REP3-013**], submitted at Deadline 3, at paragraph 6.3.2. The final Construction Traffic Management Plan will detail the methodology to be employed for the temporary closures and any associated diversionary routes, and is subject to the approval of the relevant highway authorities in accordance with requirement 16 of the draft DCO.
REP2-139	Construction	The U6006 is scheduled to be 'Closed to all traffic save for traffic under the direction of the undertaker' for an undisclosed period; this is to enable its use by construction traffic and for underground cabling. It will no longer be able to fulfil its highway function as a through route for an undetermined extended period.	Each of the temporary road closures are expected to be no longer than one-week and occur on narrow roads where the use of two-way signals is not possible. Wherever possible, emergency vehicles, pedestrians and cyclists will be permitted to travel in both directions through the road closure. This is set out in the Framework Construction Traffic Management Plan and Travel Plan [**REP3-013**], which is secured under the draft DCO. The Applicant proposes to cross U6006 for the purpose of installing the cable corridor and constructing and maintaining E12 and ECO3; however, the applicant does not propose to use U6006 as a route of access for construction vehicles.
REP2-200, REP2-238	Construction	Heavy traffic during construction will make it difficult and dangerous to ride horses locally.	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 impact on NMUs (and therefore horse riders) during the construction period as a result of the construction staff vehicles or HGVs.

Parties reference	Theme	Summary of issue raised	Applicant's response
			Table 13-33 in the Transport and Access chapter of the ES [**APP-045**] details that peak construction period traffic will not result in significant effects for vehicle travellers in terms of driver delay, accidents and safety. In addition, the peak construction traffic will not result in significant effects on Non-Motorised Users (NMUs) in terms of severance, pedestrian delay, pedestrian/cycle amenity, fear and intimidation and accidents and safety.
REP2-222, REP2-224	Construction	Significant investment will be required to bring the proposed routes up to an appropriate standard for HGVs.	Paragraph 7.2.14 of the Framework Construction Traffic Management Plan and Travel Plan [**REP3-013]** includes a requirement to undertake conditional surveys before, during and after construction to identify any impacts which are a result of the development that need to be remediated. Where the pre-condition survey identifies that there would be a benefit to having appropriate measures in place to protect or maintain the road surface, to reduce the likelihood of damage caused by construction vehicles, the applicant will enter discussions with the LHA on this matter.
REP2-142, REP2-258	Cumulative impacts	Construction traffic will exacerbate the impact of HGVs going to and from the Bay Farm Anaerobic Digester.	Traffic associated with existing land uses, which includes the Bay Farm Anaerobic Digester located on Newmarket Road, has been taken into account in the baseline assessment for the Transport Assessment [**APP-117**] and the Transport and Access chapter of the ES [**APP-045**]. Table 13-33 in the Transport and Access chapter of the ES [**APP-045**] details that peak construction period traffic will not result in significant effects for vehicle travellers in terms of driver delay, accidents and safety. In addition, the peak construction traffic will not result in significant effects on Non-Motorised Users (NMUs) in terms of severance, pedestrian delay, pedestrian/cycle amenity, fear and intimidation and accidents and safety.
REP2-208	Vehicles	The latest changes to the Application require exceptional sized vehicles to be on the road and indeed to require special road works and permissions which will worsen construction impacts.	Swept path analysis has been undertaken for HGVs and Abnormal indivisible Loads (AILs) and are provided within the Framework Construction Traffic Management Plan and Travel Plan [**REP3-013**]. Chapter 7 (paragraph 7.2.14) of the Framework Construction Traffic Management Plan and Travel Plan [**REP3-013**] includes a requirement to undertake conditional surveys before, during and after construction to identify any impacts which are a result of the development that need to be remediated. The Applicant has proposed temporary measures to accommodate the passage of Abnormal Indivisible Loads (AILs) which is provided within the

Parties reference	Theme	Summary of issue raised	Applicant's response
			Framework Construction Traffic Management Plan and Travel Plan [**REP3-013**]. These include the temporary removal, and then subsequent reinstatement, of street furniture and signage. These embedded mitigation measures will ensure the safe passage of the AILs without giving rise to effects which would be significant in EIA terms.
REP2-238	Construction	Road closures will route traffic through Kennett, increasing congestion.	Each of the road closures are associated with the construction of a site access or the construction of the grid connection. The road closures are identified to ensure the safety of the construction workers and public. Each of the temporary road closures is expected to be no longer than one-week and occur on narrow roads where the use of two-way signals is not possible. Wherever possible, emergency vehicles, pedestrians and cyclists will be permitted to travel in both directions through the road closure. This has been included in the updated Construction Traffic Management Plan and Travel Plan [**REP3-013**], submitted at Deadline 3, at paragraph 6.4.3. The final Construction Traffic Management Plan will detail the methodology to be employed for the temporary closures and any associated diversionary routes, and is subject to the approval of the relevant highway authorities in accordance with requirement 16 of the draft DCO. In the infrequent event of an A11 closure, Sunnica traffic will need to follow the diversions established by National Highways and the Local Highways Authorities. Any diversions and traffic management that National Highways put in place for any works on the Strategic Road Network need to be suitable to accommodate all traffic on the network, of which the proportion associated with Sunnica is minimal. It is therefore reasonable to conclude that the use of any diversionary routes would not result in additional impacts requiring assessment.
REP2-101, REP2-107, REP2-119, REP2-132, REP2-187, REP2-199, REP2-202, REP2-208, REP2-210, REP2-222, REP2-230, REP2-233, REP2-234, REP2-	Congestion	There will be congestion on the roads, especially during peak hours due to HGVs.	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 **[REP3-013]** 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

Parties reference	Theme	Summary of issue raised	Applicant's response
236, REP2-253A, REP2-256, REP2-262, REP2-183			A11, A14 and A142. Further information is provided in the Framework Construction Traffic Management Plan and Travel Plan [**REP3-013**]. Table 13-33 in the Transport and Access chapter of the ES [**APP-045**] details that peak construction period traffic will not result in significant effects for vehicle travellers in terms of driver delay, accidents and safety. In addition, the peak construction traffic will not result in significant effects on Non-Motorised Users (NMUs) in terms of severance, pedestrian delay, pedestrian/cycle amenity, fear and intimidation and accidents and safety.
REP2-101, REP2-107, REP2-108, REP2-125, REP2-132, REP2-166, REP2-186	Road condition	Construction traffic will damage local roads, kerb stones, verges, drain covers, carriageway markings and roadside furniture.	Paragraph 7.2.14 of the Framework Construction Traffic Management Plan and Travel Plan [**REP3-013**] includes a requirement to undertake conditional surveys before, during and after construction to identify any impacts which are a result of the development that need to be remediated. Where the pre-condition survey identifies that there would be a benefit to having appropriate measures in place to protect or maintain the road surface, to reduce the likelihood of damage caused by construction vehicles, the Applicant will enter discussions with the LHA on this matter.
REP2-097, REP2-108, REP2-124, REP2-125, REP2-190, REP2-222, REP2-236, REP2-258, REP2-209, REP2-213, REP2-226	Safety	Construction traffic poses a safety risk to road users, cyclists and pedestrians due to the narrow roads around the Scheme.	Analysis of the available Personal Injury Collison (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. In addition to the review within the Transport Assessment, in response to questions raised by the Councils, the Applicant has undertaken further reviews of road safety in the following locations: • The A14 Junction 37 within the Transportation Technical Note [**REP2-041**] submitted at Deadline 2. • The A11 NB Off-slip/Elms Road Junction, in response to 13.71 of the LIR, with reference to data and modelling included in Section 4 of Transportation Technical Note [**REP2-041**] submitted at Deadline 2. • The B1102 Freckenham Road/The Street junction, in response to 13.73 of the LIR.

Parties reference	Theme	Summary of issue raised	Applicant's response
			Each of these more detailed reviews support the conclusion drawn in paragraph 3.5.14 of the Transport Assessment [**APP-117**] the Applicant concludes that there is no "*particular safety concern that needs to be considered as part of the Scheme proposals*." Table 13-33 in the Transport and Access chapter of the ES [**APP-045**] details that peak construction period traffic will not result in significant effects for vehicle travellers in terms of driver delay, accidents and safety. In addition, the peak construction traffic will not result in significant effects on Non-Motorised Users (NMUs) in terms of severance, pedestrian delay, pedestrian/cycle amenity, fear and intimidation and accidents and safety.
REP2-169	Maintenance	There is no indication of who will be responsible for righting damage done to local roads as a result of the Scheme.	The Applicant will undertake highway condition surveys before, during and after the construction to identify any impacts which are a result of the development that need to be remediated. Where the pre-condition survey identifies that there would be a benefit to having appropriate measures in place to protect or maintain the road surface, to reduce the likelihood of damage caused by construction vehicles, the applicant will enter discussions with the LHA on this matter **[REP3-013]**.
REP2-099	Disruption	There will be lots of disruption when the Applicant has to close roads to lay the cable.	Each of the road closures are associated with the construction of a site access or the construction of the cable corridor. The road closures are identified to ensure the safety of the construction workers and public. Each of the temporary road closures are expected to be no longer than one-week and occur on narrow roads where the use of two-way signals is not possible. Wherever possible, emergency vehicles, pedestrians and cyclists will be permitted to travel in both directions through the road closure. This has been included in the updated Construction Traffic Management Plan and Travel Plan [**REP3-013**], submitted at Deadline 3, at paragraph 6.3.2. The final Construction Traffic Management Plan will detail the methodology to be employed for the temporary closures and any associated diversionary routes, and is subject to the approval of the relevant highway authorities in accordance with requirement 16 of the draft DCO.
REP2-193	Disruption	Snailwell's infrastructure would be severely damaged including the road through the village. If the Applicant got its way there	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. The exact roads are to be agreed with the local highway authorities in advance of construction. Where the pre-

Parties reference	Theme	Summary of issue raised	Applicant's response
		would be large number of lorries going through Snailwell for years to come.	condition survey identifies that there would be a benefit to having appropriate measures in place to protect or maintain the road surface, to reduce the likelihood of damage caused by construction vehicles, the Applicant will enter discussions with the LHA on this matter. This is committed to within Section 7 of the Framework Construction Traffic Management Plan and Travel Plan [**REP3-013**], updated at Deadline 3. The overall construction period is forecast for two years, with the construction of Sunnica West Site A forecast for seven months as identified in Table 6-3 in the Transport Assessment [**APP-117**].
REP2-102	CTMP	The CTMP is misleading and unrealistic.	The Applicant considers this document to be clear and realistic. The Applicant has submitted an updated iteration of the Framework Construction Traffic Management Plan and Travel Plan [**REP3-013**] at Deadline 3, which includes clarification on a range of matters raised by the Examining Authority's First Written Questions, and the Local Impact Report. The contractor will be responsible for the production of the final Construction Traffic Management Plan and Travel Plan, which will be in accordance with the Framework document certified in the DCO. Requirement 16 contained in Schedule 2 to the draft DCO requires the relevant county authority's approval of the CTMP before the commencement of the development.
REP2-102	ANPR	A comprehensive system of ANPR is likely to be a significant resource to manage.	The Applicant has committed to monitoring, reporting and enforcement measures as set out in Sections 7 and 8 of the Framework Construction Traffic Management Plan and Travel Plan [**REP3-013**]. This has been updated at Deadline 3 to provide further clarification and commitments from the Applicant. The concern regarding the technology mentioned is noted, however the Applicant has made the commitment to monitor, report and enforce however, the technology to be used to achieve this is not fixed at this stage.
REP2-102	CTMP	The proposed permit system is likely to result in a fly-parking problem.	The two centralised car parks and permit system, as set out in Sections 7 and 8 of the Framework Construction Traffic Management Plan and Travel Plan [**REP3-013**], have been developed to reduce the impact of construction staff on the local highway network and local communities. Given the proposed number of car parking spaces to be provided can accommodate

Parties reference	Theme	Summary of issue raised	Applicant's response
			the forecast peak number of construction vehicles there is no incentive for construction staff to park off-site. As identified in the Framework Construction Environmental Management Plan [**APP-123**], a Community Liaison Group will be set up prior to construction and a Community Liaison Officer (CLO) will be appointed to engage with local communities during construction. Contact details will also be available on the display board at the site entrance should anyone wish to make contract. With regards to "fly" parking, the role of the CLO will be to listen to any concerns of local communities which may arise, and investigate as necessary. If staff are parking off-site, and this is causing a highways safety or amenity issue, the CLO will liaise with staff through the TP and encourage staff to use the on-site parking instead. The two staff car parks can accommodate the peak number of construction staff vehicles forecast as identified in the Transport and Access chapter of the ES [**APP-045**] and TA [**APP-117**]. Whilst the use of on-site parking will necessarily be security controlled, there will be no restrictions or charges to valid construction staff accessing the car park, and therefore there should be no incentive to "fly" park and every incentive to use the designated on-site parking. The Framework Construction Traffic Management Plan and Travel Plan [**REP3-013**] also provides the commitment at 7.3.2, from the Applicant for the Transport/Travel Plan co-ordinator to "liaise proactively as appropriate with local transport and traffic groups, local planning authorities, local highway authorities, National Highways, and the police, Parish Councils, the public, and the East of England Ambulance Service NHS Trust (EEAST). To include recording and collating any complaints relating to transport aspects of construction activities." Section 7.4 of the F-CTMP/TP requires reporting on information on complaints received on transport related issues including parking. In addition, the use of mini-buses to pick-up and drop-off construction staff from local residential areas will be investigated to minimise the number of construction staff vehicles travelling to/ from the two centralised car parks.

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-102	CTMP	The mini-bus system will lack flexibility, especially for senior staff and engineers needing to travel to multiple sites in the day.	The application of two centralised car parks and the use of mini-buses are an efficient way of distributing construction staff around the site and reducing the number of construction staff vehicles on the local highway network. The construction workers will be typically working within one part of the site per day, rather than on multiple different sites throughout the day. Thus, there will be minimal need for movement of construction staff throughout the day. As outlined in Chapter 3: Scheme Description **[REP2-022]** construction compounds will be located within Sunnica East Sites A and B and Sunnica West Sites A and B. These will provide facilities for workers so they will not be required to travel off-site on their lunchbreak which will include welfare facilities, washrooms, toilet facilities, rest rooms and drying rooms.
REP2-104, REP2-124, REP2-125, REP2-132	Disruption	Roads will be closed and seriously affected during construction.	Each of the road closures are associated with the construction of a site access or the construction of the cable corridor. The road closures are identified to ensure the safety of the construction workers and public. Each of the temporary road closures are expected to be no longer than one-week and occur on narrow roads where the use of two-way signals is not possible. Wherever possible, emergency vehicles, pedestrians and cyclists will be permitted to travel in both directions through the road closure. This has been included in the updated Construction Traffic Management Plan and Travel Plan [**REP3-013**], submitted at Deadline 3, at paragraph 6.43.2. The final Construction Traffic Management Plan will detail the methodology to be employed for the temporary closures and any associated diversionary routes, and is subject to the approval of the relevant highway authorities in accordance with requirement 16 of the draft DCO.
REP2-108	Road suitability	When travelling through Freckenham around Pound Corner, and turning up the West Row junction to the old railway bridge that forms a cross roads, consider the suitability of the roads with regard to the quantity of HGVs	As part of the Framework Construction Traffic Management Plan and Travel Plan [**APP-118**], a route review for cranes, HGVs and Abnormal Indivisible Loads (AILs) was undertaken from the A14 and A11 to the required site accesses. The routes which are included within the reviews and the swept path analysis of the AILs are shown in the updated Framework Construction Traffic Management Plan and Travel Plan [**REP3-013**]. The route review identified that there was a practical and achievable route from the Strategic Road Network to the site accesses that were required. In places, temporary signage removal was identified to accommodate the crane

Parties reference	Theme	Summary of issue raised	Applicant's response
		that will be expected to travel this route.	or AIL swept paths. The swept path analysis for the HGVs and AILs is provided within the updated Framework Construction Traffic Plan Management and Travel Plan [**AS-300, AS-301**]. The construction routes proposed are in line with the weight restrictions for the local highway. Where there are no weight restrictions in place, the public highway is available for use by legal and roadworthy vehicles. It is the responsibility of the Local Highway Authority, and not the Applicant, to identify vulnerable structures on the existing public highway where there are not current weight restrictions, and introduce such weight restrictions as required. Chapter 7 (paragraph 7.2.14) of the Framework Construction Traffic Management Plan and Travel Plan [**REP3-013]** includes a requirement to undertake conditional surveys before, during and after construction to identify damage caused by the construction of the Scheme, and to remediate such damages. If appropriate, measures will be taken prior to construction to ensure safe passage for vehicles.
REP2-199	Road suitability	There is the difficult four cross-road [sic] bridge to still be negotiated	A weight restriction was identified on the bridge on Freckenham Road / Isleham Road junction. Therefore, an alternative vehicle route for the Abnormal Indivisible Load (AIL) was identified which avoids the bridge. The swept path analysis for the Ferry Lane (Freckenham Road) / Isleham Road junction is provided within Figure 29 in the Framework Construction Traffic Management Plan and Travel Plan [**REP3-013**] and the vehicle routes avoid the bridge with the weight limit.
REP2-116REP2-116	Road suitability	The Newmarket Road from the A11 to Worlington is a 'C' classed road which is narrow and with no central road markings.	Temporary traffic management (shown on the Traffic Regulation Measures Plans – Temporary Measures [**REP-011, REP2-012**]) is proposed to ensure the safe passage, entry and egress of construction vehicles in and out of the site accesses and for the safe passage of the public. A signage strategy will be implemented to warn motorists of the upcoming temporary traffic signals and construction site access. The temporary traffic measures will be implemented in line with the Traffic Signals Manual chapter 8 and the guidance on the use of portable vehicle signals as published by the Department for Transport. The signage and layout of temporary traffic regulation measures will be agreed with the relevant County Authority in advance of implementation. This has been included in the updated

Parties reference	Theme	Summary of issue raised	Applicant's response
			Construction Traffic Management Plan and Travel Plan [**REP3-014**], submitted at Deadline 3, at paragraph 6.4.2.
REP2-116REP2-116, REP2-231	Road suitability	The Applicant even wants to use the Golf Links Road which is hardly wide enough for two cars to pass.	Following feedback from the pre-application consultation, the Applicant has removed the construction site access from Golf Links Road. This removes the requirement for HGVs to travel along Golf Links Road during the construction phase.
REP2-116REP2-116	Road suitability	Using the unclassified road U6006 off Elms Road for construction transportation would destroy the characteristics of this tranquil route used by walkers, dog walkers, horse riders.	Chapter 12: Socio-economics and Land Use of the Environmental Statement [**APP-044**] assesses the impact on PRoW, including the U6006. The assessment identifies that users of this route would experience temporary disruption during construction via temporary severance. The effect arising from this is assessed to be minor adverse at the Sunnica East Site B, which is not significant. The route would be reopened after construction and during operation, new permissive routes would be created which would link to PRoW U6006 at Sunnica East Site B, providing a safe route for local residents. This is assessed to have a minor beneficial effect. The unclassified road U6006 runs through Sunnica East Site B between the southern edge of Worlington in the north and Elms Road in the south. The route passes between two rows of mature trees and dense vegetation, which enclose much of its length and screen views out to the wider landscape. The Outline Landscape and Ecology Management Plan (OLEMP) [**REP3-011** and **REP3-012**], explains how impacts on U6006 will be addressed
REP2-116REP2-116	Road suitability	Routes across farmland for all construction traffic etc should be used instead of unsuited tracks such as U6006.	The Applicant proposes to cross U6006 for the purpose of installing the cable corridor and constructing and maintaining E12 and ECO3; however, the Applicant does not propose to use U6006 as a route of access for construction vehicles. The Applicant amended article 11 of the draft DCO at Deadline 2 [**REP2-013**] to clarify that in relation to the power sought to authorise the use of motor vehicles on public rights of way, it seeks that power only for the purposes of crossing public rights of way. Table 13-33 in the Transport and Access chapter of the ES [**APP-045**] details that peak construction period traffic will not result in significant effects for vehicle travellers in terms of driver delay, accidents and safety. In addition, the peak construction traffic will not result in significant effects on Non-

Parties reference	Theme	Summary of issue raised	Applicant's response
			Motorised Users (NMUs) in terms of severance, pedestrian delay, pedestrian/cycle amenity, fear and intimidation and accidents and safety.
REP2-199	Road suitability	There are no "A" roads nearby, the site will be serviced by "B" roads and some are narrow with passing places.	Swept path analysis has been undertaken for HGVs and Abnormal Indivisible Loads (AILs) and are provided within the Framework Construction Traffic Management Plan and Travel Plan [**REP3-013**]. Chapter 7 (paragraph 7.2.14) of the Framework Construction Traffic Management Plan and Travel Plan includes a requirement to undertake conditional surveys before, during and after construction to identify damage caused by the construction of the scheme, and to remediate such damages. If appropriate, measures will be taken prior to construction to ensure safe passage for vehicles. The temporary measures required to accommodate the movements of the AILs are identified within Framework Construction Traffic Management Plan and Travel Plan] with physical measures including temporary removal of street furniture to accommodate the swept path of the AILs where it overhangs the verge referenced throughout Chapter 5. All the identified measures are temporary and are reflected in Part 2 of Schedule 5 to the draft DCO [**REP2-012**] to be carried out at the corresponding locations shown on Access and Rights of Way Plans [**REP2-006**]. No permanent physical mitigation works are required.
REP2-123	Road suitability	The Applicant has said it would not be using Golf Links Road for the construction of the site, but when we asked about the maintenance vehicles going to and from the sites after completion, they were unable to say how many vehicles this would involve and, bearing in mind that the Scheme will be operating for 40 years, this is an unsatisfactory answer. More assurances are needed GLR will be protected from Scheme traffic.	Following the pre-application consultation the Applicant revised its proposals to avoid the need for HGVs associated with the construction phase to travel along Golf Links Road. HGVs are not required along Golf Links Road during the operational period and maintenance will be undertaken using smaller vehicles during the operational phase, if and when required. The HGV routes are established within the Framework Construction Traffic Management Plan and Travel Plan [**REP3-013**].

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REP2-225, REP2-231	Road suitability	We have been assured by the Applicant that all reference to the use of Golf Links Road will be removed from the proposals.	Following feedback from the pre-application 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. HGVs are not required along Golf Links Road during the operational period and maintenance will be undertaken using smaller vehicles during the operational phase, if and when required. The HGV routes are established within the Framework Construction Traffic Management Plan and Travel Plan [**REP3-013**].
REP2-215	Road suitability	The proposed access point for Sunnica West Site B is just before the 7.5t weight limit on the Fordham Road comes into effect. The use of this access will result in HGVs passing through Snailwell village (when no other HGVs are permitted) which is in conflict with the intent of the traffic regulation.	The weight limit identified on Fordham Road relates to the weight restriction of the bridge, located to the north of Sunnica West Site B Site Access D on Fordham Road. This is not proposed to be used within the HGV routes which are established within the Framework Construction Traffic Management Plan and Travel Plan [**REP3-013**]. The first image below provides a screenshot of the weight limit sign relating to the bridge on Fordham Road travelling to the bridge from the south (northbound) which references the weight restriction in 0.5 miles which is where the bridge is located. The second image below provides a screenshot of the weight limit sign on Fordham Road arriving at the bridge from the south.

Parties reference	Theme	Summary of issue raised	Applicant's response
			Travelling towards the bridge from the north (southbound) there is also a sign referencing the weight limit on the bridge ahead as shown in the first screenshot below. The second screenshot provides an image of the weight limit sign at the bridge. Upon entering Snailwell from the north (southbound) there is no signage provided which references a weight restriction along the section of Fordham Road within Snailwell. Therefore, the HGV route identified along Fordham Road for HGVs to travel to/from the Sunnica West Site B Site Access D on Fordham Road does not use highway which is subject to a weight restriction.
REP2-121	Road suitability	The ASI1 coach had difficulties accessing the sites once away from the trunk roads – a number of the sites being only accessible by local village roads and lanes – therefore access for the far larger	As part of the Framework Construction Traffic Management Plan and Travel Plan [**REP3-013**], a route review for cranes, HGVs and Abnormal Indivisible Loads (AILs) was undertaken from the A14 and A11 to the required site accesses. The routes which are included within the reviews and the swept path analysis of the AILs are shown in the updated Framework Construction Traffic Management Plan and Travel Plan.

Parties reference	Theme	Summary of issue raised	Applicant's response
		equipment required during the two years of construction of the scheme will prove impossible without significant disruption, long term road closures and costly re-routing.	The route review identified that there was a practical and achievable route from the Strategic Road Network to the site accesses that were required. In places, temporary signage removal was identified to accommodate the crane or AIL swept paths. The swept path analysis for the HGVs and AILs is provided within the updated Framework Construction Traffic Plan Management and Travel Plan.
REP2-124, REP2-258	Road suitability	The junction adjacent to Walnut Tree Pub is already extremely busy during rush hour. Large vehicles turning left out of Newmarket Road into The Street have to use both lanes of the road and overhang the pavement to navigate this junction which will cause major disruption and traffic numbers.	The Applicant has agreed with the local highway authority to escort HGVs through the Newmarket Road/Freckenham Road T-Junction within Worlington to safe passage of vehicles and the safety of the public and to avoid damage to the local building. Swept path analysis of the AILs are provided within the Framework Construction Traffic Management Plan and Travel Plan [**REP3-013**] and the AIL is not proposed to use the T-Junction within Worlington.
REP2-124	Road suitability	The Applicant plans to install traffic lights at one East Site B access along the main route in to Worlington from the A11 (Newmarket Road) and use Newmarket Road and Golf Links Road as further routes to another Sunnica East site B access point. This will, without doubt, cause a major increase in traffic numbers, subsequent delays and inconvenience.	The temporary traffic management measures shown on the Traffic Regulation Measures Plans – Temporary Measures [**REP2-007 to REP2-011**] is proposed to ensure the safe passage, entry and egress of construction vehicles in and out of the site accesses and for the safe passage of the public. The temporary traffic management is in place of providing the visibility splay in full which could require a large amount of vegetation trimming or removal. A signage strategy will be implemented to warn motorists of the upcoming temporary traffic signals and construction site access. The temporary traffic measures will be implemented in line with the Traffic Signals Manual chapter 8 and the guidance on the use of portable vehicle signals as published by the Department for Transport. The signage and layout of temporary traffic regulation measures will be agreed with the relevant County Authority in advance of implementation. This has been included in the updated Construction Traffic Management Plan and Travel Plan [**REP3-013**], submitted at Deadline 3, at paragraph 6.4.2.
REP2-187, REP2-224	Operations	There will be traffic impacts during operations.	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

Parties reference	Theme	Summary of issue raised	Applicant's response
			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. The DCO application seeks authorisation to construct, operate and maintain the Sunnica Energy Farm. Article 2 of the draft DCO [**REP2-012**] 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 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.
REP2-119, REP2-253A	Decommissioning	Disruption for decommissioning will be the same as for installation.	As detailed in paragraph 13.8.255 of the Transport and Access chapter of the ES [**APP-045**], the operational life of the Scheme is to be 40 years and decommissioning is therefore estimated to be in 2065. Background traffic flows cannot be accurately forecast over 40 years into the future and therefore the transport impact of the decommissioning phase cannot be accurately assessed. It is not anticipated at this point in time that the impacts associated with decommissioning would be worse than during the construction period. On this basis as the construction period is considered to have the greatest change on the surrounding transport network, only the construction phase has been assessed. The effect of the decommissioning phase is anticipated to be the same or less than construction phase, and therefore also not significant. A

Parties reference	Theme	Summary of issue raised	Applicant's response
			Framework DEMP has been prepared see Appendix 16E of this Environmental Statement [REP2-029] and will be developed prior to the decommissioning phase to control the potential impacts. A DTMP and a DWTP will be produced prior to commencing decommissioning.
REP2-121	Cabling	Cabling under the A11 is unacceptable.	This comment is noted. The cable corridor has been developed to avoid the need to lay cable in the public highway. Where cables cross under 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.
REP2-120	Road impacts	Concerned by the effect of this development on the B1085 Dane Hill Road and Station Road at Kennett, particularly during construction. The railway bridge is old and weak and is width restricted. The roundabout in Kentford is a recognised bottleneck. No account seems to have been taken of the fact that this road will be made considerably busier by the planned construction of 500 additional houses with access onto this road.	The HGV routes are established within Chapter 4 of the Framework Construction Traffic Management Plan and Travel Plan [**REP3-013**]. None of the designated HGV routes for the Scheme go through Kentford. As shown in the flow plots in Annex F of the Transport Assessment [**APP-117**], during the construction period, 81 construction staff vehicles are forecast to travel northbound on Station Road from Kentford to the site in the development AM peak hour (06:00-07:00) and southbound in the development PM peak hour (19:00-20:00). Table 13-33 in the Transport and Access chapter of the ES [**APP-045**] details that peak construction period traffic will not result in significant effects for vehicle travellers in terms of driver delay, accidents and safety. In addition, the peak construction traffic will not result in significant effects on Non-Motorised Users (NMUs) in terms of severance, pedestrian delay, pedestrian/cycle amenity, fear and intimidation and accidents and safety. The Transport and Access chapter of the ES [**APP-045**] has included committed developments in the future growth forecasts. Furthermore, construction staff will travel on the highway network before 07:00 which is before the network AM peak hour (08:00-09:00) and depart after 19:00, after the PM network peak hour (17:00-18:00). Therefore, the Scheme is using the spare highway capacity outside of the network peak hours and inherently minimising the impact on the local highway network by avoiding staff travelling to or from the site within the network peak hours.

Parties reference	Theme	Summary of issue raised	Applicant's response
			The Applicant has engaged with Network Rail on the construction of the Scheme throughout the planning process and continues to engage with Network Rail on any areas that may affect the rail network.
REP2-120	Impact on Cambridge-Mildenhall railway	There seems to be no awareness of the long-term ambition of the Cambridgeshire and Peterborough Combined Authority and Forest Heath District Council to reconnect Mildenhall to Cambridge by rail.	This is not relevant to the Scheme and has not been raised in engagement with consultees including the Councils.
REP2-187, REP2-236	Impact on local businesses	Local businesses will see a drop in revenue as people look to purchase goods from the internet rather than fight through the traffic to visit the shops.	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. The Applicant's Environmental Statement found that there are no community facilities or businesses that would likely experience a significant effect on their amenity during construction, operation or decommissioning. These findings can be found in Chapter 12 of the Environmental Statement [**APP-044**]. A robust construction management plan will be implemented, with due consideration to be given to the management of construction traffic both in terms of the impact of vehicle movements upon the highway network and highway network users including local businesses to minimise delays and disruption. The Applicant has set out details of its approach to managing impacts from construction in the Framework Construction Traffic Management Plan and Travel Plan [**REP3-13**], the approval and implementation of which is secured via a requirement to the DCO. As a result, no impacts are anticipated, and no associated economic costs are expected.
REP2-165	Construction	Construction traffic will impact on the use of Elms Road as an access by Brookside Stud.	The Brookside Stud farm is located on Badlingham Road, which can be reached via Elms Road. Access is also available from the Chippenham direction via Badlingham Road. Thus there are multiple access routes which can be used.

Parties reference	Theme	Summary of issue raised	Applicant's response
			The Applicant has committed for sections of Elms Road to be widened up to 7.2m width. This is set out in the Transportation Technical Note [**REP2-041**], and is included in an update to the Framework Construction Traffic Management Plan and Travel Plan which is submitted at Deadline 3A. The highway works proposed on Elms Road are to provide safe passage for two-way HGV movements in the interest of safety to the construction workers and the public. This is based on swept path analysis of two HGVs passing another.
REP2-169	Construction	Insufficient detail has been provided regarding use of the U6006 during construction. Use of it as a construction access would have negative environmental consequences.	The Applicant proposes to cross U6006 for the purpose of installing the cable corridor and constructing and maintaining E12 and ECO3; however, the Applicant does not propose to use U6006 as a route of access for construction vehicles. The Applicant amended article 11 of the draft DCO at Deadline 2 [**REP2-013**] to clarify that in relation to the power sought to authorise the use of motor vehicles on public rights of way, it seeks that power only for the purposes of crossing public rights of way.
REP2-169	Assessment	Insufficient traffic data is provided for La Hogue Road, Elms Road and through Worlington.	The potential to undertake additional traffic surveys to provide further confidence in the conclusions in the ES was discussed with the Local Highway Authorities and is set out in detail in Section 4 of the Transportation Technical Note [**REP2-041**], submitted at Deadline 2. It was agreed between the Applicant and the Local Highway Authorities that there are areas where additional data would increase the level of confidence in the conclusions through providing a more comprehensive geographical coverage of data. Additional traffic surveys were therefore carried out from Thursday 7th to Wednesday 13th July 2022, with the LHAs provided with an opportunity to comment on the survey scope (no comments were received). The traffic surveys included Elms Road, the A11/Elms Road T-Junction, La Hogue Road and Freckenham Road. It was agreed with the Local Highway Authorities that there was no additional data requirement for the A142 and Burwell, given low number of staff and HGVs. The analysis applied within Chapter 13 – Transport and Access of the Environmental Statement [**APP-045**] has been updated using the July 2022 survey data. This includes severance, driver delay and fear and intimidation.

Parties reference	Theme	Summary of issue raised	Applicant's response
			The results of the updated analysis indicate that in the AM and PM development peak hours the links in question are forecast to have either a negligible or minor adverse impact in terms of severance, pedestrian delay, pedestrian / cycle amenity and fear and intimidation. This is not considered to be significant in EIA terms. This does not affect the conclusions of the Environmental Statement. Further details on the additional traffic surveys and the EIA analysis are provided in Section 4 of the Transportation Technical Note [**REP2-041**].
REP2-210	Construction	Disruption to essential and emergency services due to road closures, and increased construction traffic	Management and mitigation during the construction period is outlined in the Framework Construction Traffic Management Plan and Travel Plan **[REP3-016]** and the Traffic Regulation Measures Plans – Temporary Road Closures and Traffic Regulation Measures Plans – Temporary Measures **[REP2-007 to REP2-011]** 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. Wherever possible, emergency vehicles, pedestrians and cyclists will be permitted to travel in both directions through the road closure. This has been included in the updated Construction Traffic Management Plan and Travel Plan [**REP3-013**], submitted at Deadline 3, at paragraph 6.4.3. Table 13-33 in the Transport and Access chapter of the ES [**APP-045**] details that peak construction period traffic will not result in significant effects for vehicle travellers in terms of driver delay, accidents and safety. As such there is not forecast to be any disruption to essential or emergency services as a result of construction traffic. In addition, the peak construction traffic will not result in significant effects on Non-Motorised Users (NMUs) in terms of severance, pedestrian delay, pedestrian/cycle amenity, fear and intimidation and accidents and safety.
REP2-166	Construction	HGV traffic will be intimidating for older residents in the winter months. This will impact on their willingness to drive and therefore also impact on local venues.	Table 13-33 in the Transport and Access chapter of the ES [**APP-045**] details that peak construction period traffic will not result in significant effects for vehicle travellers in terms of driver delay, accidents and safety. In addition, the peak construction traffic will not result in significant effects on Non-Motorised Users (NMUs) in terms of severance, pedestrian delay, pedestrian/cycle amenity, fear and intimidation and accidents and safety.

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-258	Transport	The Applicant should build a service road linking Sunnica East A and B onto Elms Road so construction traffic can enter at this point.	Consultation with the local highway authority has been undertaken and it has been agreed that HGVs will be escorted through the Newmarket/Freckenham Road junction in Worlington to ensure the safe passage of the vehicle in the interest of road safety. Plate 3 of the Transport Assessment shows that an average of 11 HGVs would be travelling through Worlington to access Sunnica East Site A. Therefore, as there is an acceptable existing route to facilitate this access which does not result in significant adverse effects, a haul road is not considered to be necessary at this location.

5.18 Theme 18 – Environment – Air Quality

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-101, REP2-224, REP2-233, REP2-235	Emissions	The emissions from construction vehicles will cause pollution.	Emissions from construction vehicles during construction have been modelled, and the results are presented in the Air Quality Chapter of the Environmental Statement **[APP-046]**. No significant adverse impacts have been identified.
REP2-124, REP2-134, REP2-169, REP2-224	Dust	There will be dust pollution during construction. Insufficient regard has been paid to this.	A full dust risk assessment for the construction phase has been undertaken following best practice guidance, and the results are presented in the Air Quality Chapter of the Environmental Statement **[APP-046]**. The assessment has been undertaken assuming a worst-case scenario of construction occurring at the highest level across the entire site simultaneously for the full length of the construction period. In reality, different levels of construction activities will take place in different locations and timeframes throughout the construction period. The recommended mitigation measures are based on this worst-case assessment, and as such the measures will be over and above the likely level required to ensure no off-site dust impacts.
REP2-133	Contamination	The BESS could impact air quality.	Normal operation of the BESS will have no impact on air quality. An assessment of unforeseen emissions in the event of a fire at the BESS has been undertaken and is presented in Appendix 16D of the Environmental Statement **[APP-124]**. This assessment considers the potential magnitude of the impacts that are possible in the event of unplanned emissions to air from the use of battery technology within the Scheme. The assessment sets out that the only pollutant of concern is hydrogen fluoride (HF) and concludes that concentrations of HF will be below the AEGL-1 value before reaching any sensitive receptors. As such there are not expected to be any adverse effects from HF. The expectation is that exposure will be avoided rather than mitigated. A fire is also considered unlikely to occur due to the designed-in fire suppression systems within the Scheme. Should a fire occur, the distribution of emissions would be part dependent on the weather conditions at that time, primarily the wind speed and wind direction. The wind direction will determine the direction that the plume travels, and the wind speed determines the distance the plume travels. The modelling was

Parties reference	Theme	Summary of issue raised	Applicant's response
			undertaken with five years of meteorological data, and results from the worst case year presented. As such, meteorological conditions are likely to be more favourable (higher wind speed) and lead to lower impacts than has been demonstrated. Therefore, there are unlikely to be any off-site impacts from a fire at the BESS.
REP2-235	Dust	People with asthma will be especially affected by pollution from vehicle movements.	While it is true that people with asthma are more sensitive to worsening of air quality, the assessment included in the Air Quality Chapter of the Environmental Statement **[APP-124]** has not identified any significant adverse effects from the Scheme.
REP2-182, REP2-192, REP2-199, REP2-196	Air quality	Two years' intense construction, with resultant air pollution will be detrimental/an irritancy to residents, especially to those with respiratory conditions.	Emissions from construction vehicles during construction have been modelled, and the results are presented in the Air Quality Chapter of the Environmental Statement **[APP-124]**. No significant adverse impacts have been identified. A full dust risk assessment for the construction phase has been undertaken following best practice guidance, and the results are presented in the Air Quality Chapter of the Environmental Statement. The assessment has been undertaken on a worst-case scenario of construction occurring across the entire site for the full length of the construction period. Mitigation measures in line with the risk level have been implemented, and are designed to ensure no significant off site impacts.

5.19 Theme 19 – Environment – Human Health

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-107, REP2-119, REP2-121, REP2-122, REP2-124, REP2-125, REP2-128, REP2-132, REP2-134, REP2-139, REP2-147, REP2-157, REP2-160, REP2-162, REP2-165, REP2-166, REP2-168, REP2-169, REP2-170, REP2-172, REP2-173, REP2-174, REP2-196, REP2-201, REP2-218, REP2-224, REP2-236, REP2-251, REP2-199, REP2-238, REP2-239, REP2-241, REP2-261	Wellbeing	The Scheme will have a negative impact on people's wellbeing due to its removal of open access to the countryside.	The Scheme has been designed to minimise the number and duration of closures of Public Rights of Way (PRoW), including along the cable route. If closure of PRoW is required then, as a worst-case scenario, it has been assumed that the PRoW would be closed for no more than three weeks. Chapter 15: Human Health of the Environmental Statement **[APP-047]** assessed that the Scheme would have a negative health impact on accessibility and active travel during construction and decommissioning. This is a result of temporary PRoW closures. However, measures including appropriate signage and minimising the duration of closure would be implemented to reduce impacts on users of PRoW, and are secured within the Framework Construction Environmental Management Plan (CEMP) **[REP3-015]** and Framework Decommissioning Environmental Management Plan (DEMP) **[REP2-028]**. During the operational phase, no routes will be closed, and the Scheme will provide new permissive routes which will encourage active travel. The Scheme is therefore assessed to have a positive health impact during operation in terms of access to PRoW.
REP2-218	Human Health	The Scheme is unsafe.	Chapter 15: Human Health of the Environmental Statement **[APP-047**] concluded that there will not be any significant effects on human health and wellbeing as a result of the Scheme.
REP2-199, REP2-234, REP2-236	Wellbeing	The Scheme will result in the loss of our "normal" way of life.	While it is acknowledged that the Scheme is a different type of land use to what is on the site at present, the Applicant does not consider the impact of solar energy generation to be negative or industrialising in a way that would have an adverse impact on the way of life for the local community. Chapter 15: Human Health of the Environmental Statement **[APP-047]** concluded that there will not be any significant effects on human health and wellbeing as a result of the Scheme. Chapter 12: Socio-economics and Land Use of the Environmental Statement **[APP-044]** concludes that there are no residents, community facilities or businesses that would likely experience a significant effect on their amenity during construction, operation or decommissioning.

Parties reference	Theme	Summary of issue raised	Applicant's response
			The Scheme has been designed to minimise the number and duration of PRoW closures, including along the cable route. If closure of routes is required then, as a worst-case scenario, it has been assumed that the PRoW would be closed for no more than three weeks. The Scheme has also been designed to avoid development within or directly on the boundaries of existing settlement and to retain separation between settlements and the wider landscape. Vegetation planting has been proposed throughout and around the Scheme as part of the design to enhance the landscape and screen views of the infrastructure. The design has taken the structure of the existing landscape into account. A Landscape and Visual Impact Assessment has been undertaken to assess the effects of the Scheme on landscape and visual receptors in the vicinity, such as residents, recreational users of PRoW, motorists, etc. The conclusions of this assessment are presented in Chapter 10 of the Environmental Statement **[APP-042]**.
REP2-107, REP2-122, REP2-139, REP2-196, REP2-236	Wellbeing	Temporary PROW closures during construction will have a negative impact on people's wellbeing. There is particular concern about PROW closures lasting for 24 months or more.	The Scheme has been designed to minimise the number and duration of PRoW closures, including along the cable route. If closure of routes is required then as a worst-case scenario, it has been assumed that the PRoW would be closed for no more than three weeks. Chapter 15: Human Health of the Environmental Statement **[APP-047]** assessed that the Scheme would have a negative health impact on accessibility and active travel during construction and decommissioning. This is a result of temporary PRoW closures. However, measures including appropriate signage and minimising the duration of closure would be implemented to reduce impacts on users of PRoW, and these are secured within the Framework CEMP **[REP3-015]** and Framework DEMP **[REP2-028]**. During the operational phase, no routes will be closed, and the Scheme will provide new permissive routes which will encourage active travel. The Scheme is therefore assessed to have a positive health impact during operation in terms of access to PRoW.

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-202	General	The scheme will have health and safety issues for both human and animal welfare.	Chapter 15: Human Health of the Environmental Statement **[APP-047]** concluded that there will not be any significant effects on human health and wellbeing as a result of the Scheme.
REP2-098A, REP2-224, REP2-198, REP2-209	Human Health	The Scheme represents a danger to human health because of the BESS, incl. leakage from BESS units.	The Applicant recognises how important it is to demonstrate that the BESS will be safe. The Applicant has prepared an Outline Fire Safety Management Plan in Appendix 16D of the Environmental Statement **[REP2-264]** which sets out the mitigation measures to be implemented to manage the risk of fire from the BESS. As a result of the mitigation measures outlined, the risk of a fire has been assessed as unlikely.
REP2-098A	Mental health	The application process has been a slow mental torture to affected communities.	The Applicant notes this comment.
REP2-104, REP2-116, REP2-118, REP2-124, REP2-215, REP2-181, REP2-196	Mental health	The Scheme has caused anxiety for local residents.	The human health assessment in Chapter 15: Human Health of the Environmental Statement **[APP-047]** has considered the potential positive and negative outcomes of the Scheme in respect of several determinants of health and well-being, including anxiety. 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 is considered to reflect best practice. No significant impacts are expected on human health as a result of the Scheme.
REP2-120	Substation	CPRE are particularly concerned for the safety of the residents of Burwell if the existing National Grid installation were to be further expanded.	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. 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. No significant impacts are expected on human health as a result of this, as reported in Chapter 15: Human Health of the Environmental Statement **[APP-047]**. The Applicant's Responses to Relevant Representations **[REP1-016]** explains that the impact from electromagnetic fields as part of the Burwell

Parties reference	Theme	Summary of issue raised	Applicant's response
			substation extension upon human health 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 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.
REP2-127	Biodiversity	Access to biodiversity for people's well-being is important, and this has been reinforced by many peoples experience during COVID lockdown.	The scheme has been designed to minimise the number and duration of PRoW closures, including along the cable route. If closure of routes is required then as a worst-case scenario, it has been assumed that the PRoW would be closed for no more than three weeks. Chapter 15: Human Health of the Environmental Statement **[APP-047]** assessed that the Scheme would have a negative health impact on accessibility and active travel during construction and decommissioning. This is a result of temporary PRoW closures. However, measures including appropriate signage and minimising the duration of closure would be implemented to reduce impacts on users of PRoW, and are secured within the Framework CEMP **[REP3-015]** and Framework DEMP **[REP2-028]**. During the operational phase, no routes will be closed, and the Scheme will provide new permissive routes which will encourage active travel. The Scheme is therefore assessed to have a positive health impact during operation in terms of access to PRoW.
REP2-222	Materials	The Scheme makes use of hazardous materials.	As stated in the Applicant's Responses to Relevant Representations **[REP1-016]**, measures outlined in the Framework CEMP **[REP3-015]** will ensure that pollution risks during construction will be avoided and minimised. All hazardous materials, including chemicals such as cleaning agents and solvent containing products, are required 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 Operational Environmental Management Plan (OEMP) **[REP2-030]** states that any material requiring removal from the Order limits during operation would be transported using licensed carriers and records kept. The records

Parties reference	Theme	Summary of issue raised	Applicant's response
			would detail the types and quantities of waste moved and the destinations of this waste in accordance with the relevant regulations.
REP2-181	Mental health	There is emerging evidence that there are higher rates of mental disorders in urban settings than in rural areas, and the lack of contact with nature is associated with a remarkable rate of psychological distress.	Vegetation planting has been proposed throughout and around the Scheme as part of the design to enhance the landscape and screen views of the infrastructure. The design has taken the structure of the existing landscape into account. A Landscape and Visual Impact Assessment has been undertaken to assess the effects on landscape and visual receptors in the vicinity of the Scheme, such as residents, recreational users of public rights of way, motorists, etc. The conclusions of this assessment have been presented in Chapter 10 of the Environmental Statement **[APP-042]**. Accordingly, Chapter 12: Socio-economics of the ES **[APP-044]** also assessed the effects of the Scheme on views and use of PRoWs. The Scheme has been designed to minimise the number and duration of PRoW closures, including along the cable route. If closure of PRoW is required then, as a worst-case scenario, it has been assumed that the PRoW would be closed for no more than three weeks, and therefore are not considered to have a significant or long-term impact. Chapter 15: Human Health of the Environmental Statement **[APP-047]** assessed that the Scheme would have a negative health impact on accessibility and active travel during construction and decommissioning as result of temporary PRoW closures. However, measures including appropriate signage and minimising the duration of closure will be implemented to reduce impacts on users of PRoW and are secured within the Framework CEMP **[REP3-015]** and Framework DEMP **[REP2-028]**. During the operational phase, no routes will be closed, and the Scheme will provide new permissive routes which will encourage active travel. The Scheme is therefore assessed to have a positive health impact during operation in terms of access to PRoW.
REP2-224	Mental health	The loss of countryside views will have a negative mental health impact.	Vegetation planting has been proposed throughout and around the Scheme as part of the design to enhance the landscape and screen views of the infrastructure. The design has taken the structure of the existing landscape into account. A Landscape and Visual Impact Assessment has been undertaken to assess the effects on landscape and visual receptors in the

Parties reference	Theme	Summary of issue raised	Applicant's response
			vicinity of the Scheme, such as residents, recreational users of public rights of way, motorists, etc. The conclusions of this assessment have been presented in Chapter 10 of the Environmental Statement **[APP-042]**. Accordingly, Chapter 12: Socio-economics of the ES **[APP-044]** also assessed the effects on views and use of PRoWs. The Scheme has been designed to minimise the number and duration of PRoW closures, including along the cable route. If closure of routes is required then, as a worst-case scenario, it has been assumed that the PRoW would be closed for no more than three weeks, and therefore are not considered to have a significant or long term impact. Chapter 15: Human Health of the Environmental Statement **[APP-047]** assessed that the Scheme would have a negative health impact on accessibility and active travel during construction and decommissioning as result of temporary PRoW closures. However, measures including appropriate signage and minimising the duration of closure will be implemented to reduce impacts on users of PRoW and are secured within the Framework CEMP **[REP3-015]** and Framework DEMP **[REP2-028]**. During the operational phase, no routes will be closed, and the Scheme will provide new permissive routes which will encourage active travel. The Scheme is therefore assessed to have a positive health impact during operation in terms of access to PRoW. The interactions of effects (i.e. intra-project cumulative effects) from the impacts on views and traffic increases on the health of local residents and recreational users of footpaths during construction has been assessed in Chapter 17 of the ES **[APP-049]**. The effect interaction from landscape, visual and increased traffic during construction has been assessed as not significant.
REP2-167, REP2-182, REP2-192, REP2-224	Recreation	It will be unsafe to cycle, run and walk around the area (on roads and PROWs) due to the presence of HGVs and construction activity. This will	Chapter 15: Human Health of the Environmental Statement **[APP-047]** assessed that the Scheme would have a negative health impact on accessibility and active travel during construction and decommissioning as result of temporary PRoW closures. However, measures including appropriate signage and minimising the duration of closure would be

Parties reference	Theme	Summary of issue raised	Applicant's response
		have an impact on physical health.	implemented to reduce impacts on users of PRoW and are secured within the Framework CEMP **[REP3-015]** and Framework DEMP **[REP2-028]**. However, the Scheme has been designed to minimise the number and duration of PRoW closures, including along the cable route. If closure of routes is required then, as a worst-case scenario, it has been assumed that the PRoW would be closed for no more than three weeks. During the operational phase, no routes will be closed, and the Scheme will provide new permissive routes which will encourage active travel. The Scheme is therefore assessed to have a positive health impact during operation in terms of access to PRoW.
REP2-199	Health and wellbeing	Both noise and visual pollution are recognised as being injurious to health and well-being.	The assessment in Chapter 15: Human Health of the Environmental Statement **[APP-047]** is based on best practice guidance including from Healthy Urban Development Unit (HUDU) / NHS England and the Government's Good Practice Guide for EIA. The chapter assesses the impact of noise and visual pollution on human health and wellbeing. No significant impacts from noise and visual pollution are expected on human health as a result of the Scheme.
REP2-188	Pacemakers	It is well known that the high amounts of electricity generated at the solar panels and sent to the battery storage sites will generate Electromagnetic Fields (EMF), these can cause major disruption to persons in the area who have pacemakers fitted, at the very least EMF can cause these to malfunction and in some cases cause them to stop. How is the Applicant going to mitigate against this hazard?	As stated in the Applicant's Responses to Relevant Representations **[REP1-016]**, the impact upon human health of electromagnetic 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.
REP2-169	Assessment	Assessments dismiss effects on human health despite the fact they will be profound.	Chapter 15: Human Health of the Environmental Statement **[APP-047]** undertakes a full human health assessment considering the potential positive and negative outcomes of the Scheme based on best practice

Parties reference	Theme	Summary of issue raised	Applicant's response
			guidance including from Healthy Urban Development Unit (HUDU) / NHS England and the Government's Good Practice Guide for EIA.
REP2-235	Health	What are the health implications for those of us who live so close to a solar farm?	A human health assessment considering the potential positive and negative outcomes of the Scheme in terms of health and wellbeing can be found in Chapter 15: Human Health of the Environmental Statement **[APP-047]**.
REP2-147	Healthcare providers	The impact on local healthcare providers is not adequately considered.	Chapter 15: Human Health of the Environmental Statement **[APP-047]** assesses the impact of the Scheme on access to local healthcare services during construction. The presence of additional traffic associated with the Scheme is not likely to affect local residents' ability to access healthcare facilities. The existing road network is expected to remain within capacity at all times during the construction period and there are not expected to be any considerable changes in journey time for existing users of any of the strategic roads in the study area. This is in part due to measures in the Construction Traffic Management Plan (CTMP) that will ensure that construction staff will arrive on site between 06:00 and 07:00 (prior to the AM peak hour) and depart between 19:00 and 20:00 (after the PM peak hour). There are expected to be a maximum of only 10 construction HGVs per hour (20 movements) across the Scheme. Therefore, the potential health impact on access to healthcare services during the construction period is assessed to be neutral. During the operational phase, the Scheme is expected to generate very low levels of traffic and it will not impact local residents' ability to access healthcare facilities. The potential health impact on access to healthcare services during operation is therefore assessed to be neutral. The Scheme's impact on local residents' ability to access healthcare facilities in the decommissioning phase is expected to be the same as during construction, being neutral, based on the expected similar number of trips and duration of these phases.

5.20 Theme 20 – Environment – Glint and Glare

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-097, REP2-133, REP2-135, REP2-183	Equestrian impacts	Glint and glare from solar panels will make it impossible to ride horses safely in the area, including from Badlingham Lane to Worlington.	The Glint and Glare Assessment **[APP-121]** states that solar reflections are geometrically possible towards most of the assessed Public Right of Way (PRoW), bridleway, and permissive path receptors (including U6006, which we understand is being referred to as Badlingham Lane). Screening in the form of existing and proposed vegetation will significantly obstruct the visibility of the reflecting panels for most observers; however, effects at some locations are predicted prior to and following the implementation and establishment of the mitigation measures. The effects would last for up to approximately 20 minutes per day for a static observer (this would be a worst case of 10 minutes in the morning and 10 minutes in the afternoon/evening). Solar reflections experienced by an observer along the PRoW, bridleway, or permissive path are not deemed to have a significant impact upon the amenity of an observer as the reflections have no associated safety hazard, the intensity of a reflection to common outdoor sources of glare that are frequently visible to observers, and the existing sunlight effects. No significant impacts are therefore predicted upon pedestrians or riders, and no further mitigation is required.
REP2-098A	Information	Residents have been unable to assess glint and glare impacts because the number of panels have not been specified.	As is established practice, the Applicant has assessed the Scheme's impact according to the 'Rochdale Envelope' method of the maximum parameters of the Scheme, which is set out in Chapter 5: EIA Methodology **[APP-037]**. In terms of Glint and Glare this included the maximum developable area and height and orientation of the panels. The assessment approach is defined in Chapter 2 of the Glint and Glare Assessment **[APP-121].** This has provided a worst-case scenario of the impacts of the Scheme (i.e. the maximum area to be covered by PV panels) which has been assessed in the Environmental Statement.
REP2-107, REP2-253A	Assessment	The glare caused by the panels has not been properly assessed.	The Glint and Glare Assessment **[APP-121]** was undertaken by a company who specialise in this type of assessment, Pager Power. It is a dedicated consultancy company based in Suffolk, UK. The company has undertaken

Parties reference	Theme	Summary of issue raised	Applicant's response
			projects in 51 countries within Europe, Africa, America, Asia and Australasia. Chapter 3 of the Glint and Glare Assessment **[APP-121]** outlines the methodology for assessing the potential glint and glare impacts. The methodology for the assessment is as follows: • Identify receptors in the area surrounding the solar development. • Consider direct solar reflections from the solar development towards the identified receptors by undertaking geometric calculations. • Consider the visibility of the panels from the receptor's location. If the panels are not visible from the receptor then no reflection can occur. • Based on the results of the geometric calculations and visibility of the panels, determine whether a reflection can occur, and if so, at what time it will occur. • Consider both the solar reflection from the solar development and the location of the direct sunlight with respect to the receptor's position. • Consider the solar reflection with respect to the published studies and guidance – including intensity calculations where appropriate. • Determine whether a significant detrimental impact is anticipated. Pager Power is a specialist company which has undertaken over 700 glint and glare assessments in the UK, Europe and internationally and the Applicant considers that the above methodology is robust.
REP2-120	Aircraft	The DIO should be consulted to ensure there will be no visual or other risks to aircrew when landing and taking off from RAF Mildenhall and RAF Lakenheath.	The Defence Infrastructure Organisation (DIO) Safeguarding Team which represents the Ministry of Defence (MOD) has been consulted and they have stated **[RR-1274]**: *The MOD has reviewed the proposals and the associated documentation from an air safety safeguarding perspective and can confirm, after*

Parties reference	Theme	Summary of issue raised	Applicant's response
			performing the appropriate technical assessments, that we have no objections to raise at this time.
REP2-202	Aircraft	Cousin and her husband are pilots and they confirmed they have experienced problems with glint and glare from solar panel farms while flying low and landing.	Potential aviation receptors identified in the Glint and Glare Assessment **[APP-121]** include air traffic control towers (ATC) and approaching aircraft: • RAF Mildenhall, operated by the MOD, is the closest aerodrome to the Order limits and is located approximately 2.5km to the north-east. • RAF Lakenheath Airfield is located approximately 10km to the north-east of the closest PV panels in the Scheme; and • Cambridge Airport approximately 19km to the south-west of the Order limits of the closest PV panels in the Scheme. Solar reflections are not geometrically possible for aviation receptors (i.e. the ATC tower and the approach paths for Runway 11/29) at RAF Mildenhall, which is the closest aviation receptor to the Scheme. No impacts are possible and no further mitigation is required. No detailed assessment is recommended for RAF Lakenheath or Cambridge Airport due to the distance from the development and orientation of the runways. It can be safely determined that, based on the assessment criteria, if solar reflections are possible, intensities would have a 'low potential for temporary after image' and would therefore be acceptably low in accordance with industry best practice. See section 4.4 of the Glint and Glare Assessment for more details.
REP2-166	Amenity	Glint and glare will impact on visual amenity at some times of day.	A temporal assessment has been done for glint and glare, which has considered both morning and afternoon time periods. The majority of the assessed ground-based receptors, with the exception of three dwellings and road users travelling in a south-westerly direction on a section of the A14, will not experience any significant effects as a result of glint and glare. Prior to the establishment of mitigation measures, screening in the form of solid hoarding along the Order limit is required for a small section of the A14. The recommended screening location, which will sufficiently mitigate the significant impacts before the proposed vegetation screening has

Parties reference	Theme	Summary of issue raised	Applicant's response
			established, is presented in Section 8.6 of the Glint and Glare Assessment **[APP-121]**. A moderate impact is also predicted for three dwellings under baseline conditions, which will remain until the mitigation measures have established and the reflecting panels are obstructed from view. Mitigation planting is secured through the Outline Landscape and Ecology Management Plan **[REP3-011]** and the mitigation for the road users road users travelling in a south-westerly direction on the A14 is secured through the Framework Operational Management Plan **[REP2-030].**
REP2-247	Limekilns	The applicant has also failed to assess the impact of glint and glare on users of the Limekilns Gallops.	The Limekilns Gallops has been identified as a receptor in the Glint and Glare Assessment **[APP-121] – see Table 16**. It has been concluded that no solar reflection is geometrically possible and therefore no impacts are possible.
REP2-242	Birds	The impacts of glare on bird and bats are unknown.	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, and therefore no assessment has been undertaken. Bats echolocate and are generally active at night and therefore are unlikely to be impacted by glint or glare.
REP2-243	Assessment	Modelling not done as 'in the Applicant's experience' it is not necessary yet they have never worked on something this big. Military airbase, major roads and residential areas nearby yet predict no significant impact/no	Modelling has been undertaken for glint and glare assessment. The detailed modelling results are shown in Appendix J of the Glint and Glare Assessment **[APP-121]**. The Glint and Glare Assessment has been prepared by a specialist company with experience of undertaking 700 glint and glare assessments in the UK, Europe and internationally – see response to REP2-107, REP2-253A above.

Parties reference	Theme	Summary of issue raised	Applicant’s response
		solar reflections. This was deliberate.	

5.21 Theme 21 – Environment – Ground Conditions

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-140	Ground Conditions	Concern that the orientation of the panels combined with frequent very heavy rain falling onto small areas may lead to soil erosion and pollution of the Lea Brook.	As stated in the Applicant's Responses to Relevant Representations **[REP1-016]**, at present the majority of the land is in arable production, with cultivation leaving bare soil vulnerable to water and wind erosion. Bare soil is particularly vulnerable to erosion following potato and root crop harvest as the soil is loosened and has no stubble cover. Bare soil is also found year-round on the land under outdoor pigs. However, the Scheme will have a perennial grass cover beneath the panels, 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. As outlined in ES Chapter 9 Flood Risk Drainage and Water Resources **[APP-041]** (section 9.8.171 onwards), it is considered that the potential for impacts to occur as a result of surface water runoff would be very low and the assessment found no significant effects would occur on the Lee Brook.

5.22 Theme 22 – Environment – Major Accidents

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-120	RAF Mildenhall	The Defence Infrastructure Organisation and the USAF should carry out a full risk assessment of the explosion and contamination hazard created by the combined battery storage and electrical transformer installation that will be within 2.2 km of RAF Mildenhall and its fuel tanker aircraft.	The Ministry of Defence has been consulted and have stated: *The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System. 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. The MOD has reviewed the proposals and the associated documentation from an air safety safeguarding perspective and can confirm, after performing the appropriate technical assessments, that we have no objections to raise at this time.*
REP2-233	Safety	The location of the Scheme so close to RAF Mildenhall and FAR Lakenheath represents a hazard.	See response to REP2-120 above.

5.23 Theme 23 – Environment – Waste

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-098A, REP2-102, REP2-105, REP2-107, REP2-118, REP2-120, REP2-121, REP2-132, REP2-134, REP2-142, REP2-145, REP2-146, REP2-162, REP2-170, REP2-171, REP2-201, REP2-208, REP2-216, REP2-224, REP2-234, REP2-242, REP2-241, REP2-243, REP2-253A	Recycling	There are insufficient details of how Scheme components will be decommissioned, including details about how components will be recycled or disposed of.	A Framework Decommissioning Environmental Management Plan (DEMP) is provided with the application in Appendix 16E of the Environmental Statement **[REP2-028]**. The core waste management principles utilised for the Scheme, and the final detailed DEMP, must be substantially in accordance with the framework DEMP, as required under Requirement 22 of the draft DCO **[REP2-012]**. A decision on the end use of the panels will be made prior to decommissioning. Should they still be productive there would be the option of resale or donation of panels to other end-users. Where resale or donation is not feasible, solar panels will be recycled in accordance with relevant legislative requirements and good practice at the time of decommissioning. 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). The principles of prevention, reuse, recycle, recover and disposal as defined in the 'Waste Hierarchy' will be embedded within the DRMP, which is a requirement in the Framework DEMP (see paragraph 2.8 and Table 3-11). Pursuant to Requirement 22 of the draft DCO **[RE2-012]**, the Applicant must submit the final detailed DEMP to the relevant local planning authority or authorities prior to decommissioning. It is expected that, where possible, the solar panels will be able to be readily recycled in the UK at the time of decommissioning (40 years ahead). Recycling solar PV infrastructure is an emerging industry as the current solar farms are reaching an age where they need to be decommissioned. The technology already exists in UK and Europe to recycle panels, and it is expected that recycling technology for solar equipment will be far more developed in the UK in over 40 years' time (when decommissioning is due to begin) than it currently is. At present, RecycleSolar is the only UK based solar panel recycling service, but more companies are expected to setup in the next decade as the current solar farms begin to be decommissioned.

Parties reference	Theme	Summary of issue raised	Applicant's response
			Technology removed prior to the end of the Scheme's operational life will also be recycled as far as possible and will undergo the same process as outlined above. Technology already exists in UK and Europe to recycle the mounts, panels, inverters, and other infrastructure on solar farms.
REP2-235	Recycling	The panels and batteries cannot be recycled and will be left to future generations to dispose of.	Please see response above.
REP2-172, REP2-182	Decommissioning	The hazardous materials are not easy to recycle and can contaminate drinking water. It will potentially leave a toxic wasteland which will transform the landscape forever	Please see response above.
REP2-214	Decommissioning	The cost of disposing of PV panels and batteries will make doing this financially unattractive for the Applicant.	Please see response above.
REP2-119	Recycling	The Applicant has said it is not in favour of recycling components of the Scheme due to cost and storage.	Please see response above.
REP2-177	Disposal	The Scheme is not environmentally friendly – what happens to all these solar panels and batteries when they end their useful life?	Please see response above.
REP2-208	Recycling	It seems that recycling is likely to be "outsourced" to far away countries that had a poor record	Please see response above.

Parties reference	Theme	Summary of issue raised	Applicant's response
		of effective management of polluting waste.	
REP2-133	Cabling	Why should I have to accept the redundant cables being left on my property?	The cable will be buried 2m underground. It is usual practice for cables and pipelines buried 1m below ground level to be left in situ following the decommissioning of projects. This is significantly less environmentally impactful than removing the cables at decommissioning and is in line with the mitigation hierarchy, which requires avoidance of the impact to be considered first, where practical.
REP2-208	Cabling	Elements of the Scheme will never be removed such as the cabling and the concrete cable chambers.	The only elements not to be removed from the Scheme would be the cables within Grid Connection Route A and B, which are to be buried 2m below ground level, as well as on site cabling and piles, which are buried 1m below ground level. Should Burwell National Gird Substation Extension Option 2 be taken forward, this will also be left in situ following decommissioning.

5.24 Theme 24 – Environment – BESS – Fire Safety

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-102, REP2-120, REP2-125, REP2-136, REP2-173, REP2-200, REP2-208, REP2-228, REP2-254, REP2-214	Fire risk	Battery fires are impossible to put out and will require evacuation of the area, as well as large amounts of water.	In recognition of the concerns raised by interested parties the Applicant has updated the outline Battery Fire Safety Management Plan **[REP2-032]** and submitted it for Deadline 2. It is considered this provides a detailed plan which ensures that the final design of the BESS will be acceptable and that in the unlikely event of a fire it would be managed safely ensuring the safety of site staff, first responders and the wider community. As referenced in the revised Plan the selected BESS system will have completed UL 9540A testing and / or 3rd party fire & explosion testing which quantifies gas emissions, monitors deflagration risks and validates BESS design structural integrity and quantifies suppression system performance capabilities. The Applicant is confident that battery performance capabilities, validation testing requirements, regulatory codes and safety standards will have further improved by the time of the detailed design stage. The drafting of the outline Battery Fire Safety Management Plan means the Battery Fire Safety Management Plan will be required to take account and adhere to these documents and so local residents can have confidence that the BESS site conforms to the most rigorous safety standards and the need for evacuation of the local area is highly unlikely.
REP2-208	Scale	The size of the BESS increases the likelihood and severity of any event.	In recognition of the concerns raised by interested parties the Applicant has updated the outline Battery Fire Safety Management Plan **[REP2-032]** and submitted it for Deadline 2. It is considered this provides a detailed plan which ensures that the final design of the BESS will be acceptable and that in the unlikely event of a fire it would be managed safely ensuring the safety of site staff, first responders and the wider community. The overall size of the BESS does not increase the severity of a fire event. The fire suppression measures designed into the BESS slow the spread of fire, meaning that no more than 5 racks are likely to be alight at any one time. As referenced in the revised Plan the selected BESS system will have completed UL 9540A testing and / or 3rd party fire & explosion testing which quantifies gas emissions, monitors deflagration risks and validates BESS design structural integrity.

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-136, REP2-173	Contamination	Water run-off from fighting battery fires will contaminate the soil.	The revised outline Battery Fire Safety Management Plan **[REP2-032]** specifies capacity and indicative location of bunded lagoons to capture firefighting water run-off. BESS areas and drainage channels will integrate impermeable materials to ensure runoff water will not escape to ground. Bunded lagoon design allows for easy analysis of water content and safe extraction by tankers if environmental pollution safety levels are exceeded. It should be noted that the indicative design lagoon capacity is the maximum volume of the firefighting water tanks plus 40%. When the BESS system is selected at the detailed design stage together with the internal fire suppression system, this water run off would drain to a separate water capture tank which will be appropriately sized for a full system discharge.
REP2-198	Contamination	There is potential risk of contamination of the land if there were to be a fire.	The revised outline Battery Fire Safety Management Plan **[REP2-032]** specifies capacity and indicative location of bunded lagoons to capture firefighting water run-off. BESS areas and drainage channels will integrate impermeable materials to ensure runoff water will not escape to ground. Bunded lagoon design allows for easy analysis of water content and safe extraction by tankers if environmental pollution safety levels are exceeded. It should be noted that the indicative design lagoon capacity is the maximum volume of the firefighting water tanks plus 40%. When the BESS system is selected at the detailed design stage together with the internal fire suppression system, this water run off would drain to a separate water capture tank which will be appropriately sized for a full system discharge.
REP2-230	Contamination	The BESS siting could lead to contamination of Lee Brook should an incident occur.	The revised outline Battery Fire Safety Management Plan **[REP2-032]** specifies capacity and indicative location of bunded lagoons to capture firefighting water run-off. BESS areas and drainage channels will integrate impermeable materials to ensure runoff water will not escape to ground. Bunded lagoon design allows for easy analysis of water content and safe extraction by tankers if environmental pollution safety levels are exceeded. It should be noted that the indicative design lagoon capacity is the maximum volume of the firefighting water tanks plus 40%. When the BESS system is selected at the detailed design stage together with the internal fire suppression system, this water run off would drain to a

Parties reference	Theme	Summary of issue raised	Applicant's response
			separate water capture tank which will be appropriately sized for a full system discharge.
REP2-133	Contamination	The BESS could contaminate the ground.	The Applicant assumes this representation concerns firefighting water runoff in the event of a BESS fire. There should be no grounds for concerns that BESS equipment contaminates the ground in normal operations or in the event of a fire. The revised outline Battery Fire Safety Management Plan **[REP2-032]** specifies capacity and indicative location of bunded lagoons to capture firefighting water run-off. BESS areas and drainage channels will integrate impermeable materials to ensure runoff water will not escape to ground. Bunded lagoon design allows for easy analysis of water content and safe extraction by tankers if environmental pollution safety levels are exceeded. It should be noted that the indicative design lagoon capacity is the maximum volume of the firefighting water tanks plus 40%. When the BESS system is selected at the detailed design stage together with the internal fire suppression system, this water run off would drain to a separate water capture tank which will be appropriately sized for a full system discharge.
REP2-100, REP2-102, REP2-106, REP2-108, REP2-116, REP2-117, REP2-118, REP2-119, REP2-120, REP2-124, REP2-125, REP2-132, REP2-133, REP2-134, REP2-139, REP2-142, REP2-145, REP2-146, REP2-147, REP2-150, REP2-157, REP2-160, REP2-162, REP2-165, REP2-166, REP2-	Fire risk	Lithium-ion batteries used in the BESS present an unacceptable fire risk and could explode.	In recognition of the concerns raised by interested parties the Applicant has updated the outline Battery Fire Safety Management Plan **[REP2-032]** and submitted it for Deadline 2. It is considered this provides a detailed plan which ensures that the final design of the BESS will be acceptable and that in the unlikely event of a fire it would be managed safely ensuring the safety of site staff, first responders and the wider community. As referenced in the revised Plan the selected BESS system will have completed UL 9540A testing and / or 3rd party fire & explosion testing which quantifies gas emissions, monitors deflagration risks and validates BESS design structural integrity. The Applicant is confident that battery performance capabilities, validation testing requirements, regulatory codes and safety standards will have further improved by the time of the detailed design stage. The drafting of the outline Battery Fire Safety Management Plan means the Battery Fire Safety Management Plan will be required to take account and adhere to these documents and so local residents can have confidence that the BESS site conforms to the most rigorous safety standards.

Parties reference	Theme	Summary of issue raised	Applicant's response
167, REP2-170, REP2-171, REP2-174, REP2-176, REP2-178, REP2-182, REP2-183, REP2-186, REP2-192, REP2-194, REP2-196, REP2-199, REP2-200, REP2-201, REP2-202, REP2-208, REP2-209, REP2-224, REP2-226, REP2-228, REP2-232, REP2-233, REP2-234, REP2-235, REP2-238, REP2-249, REP2-253A, REP2-254, REP2-256, REP2-257, REP2-258, REP2-196, REP2-209, REP2-194, REP2-242			
REP2-098A, REP2-099, REP2-100, REP2-104, REP2-106, REP2-107, REP2-108, REP2-117, REP2-118, REP2-119, REP2-121, REP2-124, REP2-125, REP2-133, REP2-138, REP2-147, REP2-150, REP2-155,	Proximity to villages	Close proximity of the proposed sites to the villages/residential areas is a serious safety concern (fire risk).	In recognition of the concerns raised by interested parties the Applicant has updated the outline Battery Fire Safety Management Plan **[REP2-032]** and submitted it for Deadline 2. It is considered this provides a detailed plan which ensures that the final design of the BESS will be acceptable and that in the unlikely event of a fire it would be managed safely ensuring the safety of site staff, first responders and the wider community. As referenced in the revised Plan the selected BESS system will have completed UL 9540A testing and / or 3rd party fire & explosion testing which quantifies gas emissions, monitors deflagration risks and validates BESS design structural integrity. In worst case scenario BESS incidents, which have resulted in a deflagration event in a BESS container, debris emission was localised

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-156, REP2-166, REP2-177, REP2-187, REP2-189, REP2-197, REP2-218, REP2-201, REP2-227, REP2-199, REP2-238, REP2-239, REP2-241, REP2-243, REP2-254, REP2-257, REP2-258, REP2-198, REP2-196, REP2-209, REP2-216, REP2-194, REP2-242			within a 25-metre radius from the container. The Applicant has committed to integrating gas exhaust or ventilation systems for BESS containers at the detailed design stage to mitigate deflagration risks. The Applicant is confident that battery performance capabilities, validation testing requirements, regulatory codes and safety standards will have further improved by the time of the detailed design stage. The drafting of the outline Battery Fire Safety Management Plan means the Battery Fire Safety Management Plan will be required to take account and adhere to these documents and so local residents can have confidence that the BESS site conforms to the most rigorous safety standards.
REP2-098A, REP2-099, REP2-100, REP2-117, REP2-118, REP2-147, REP2-186, REP2-188, REP2-198, REP2-196, REP2-243, REP2-228, REP2-235	Fire risk	There have been examples of BESS fires which means the BESS represents a major hazard.	In recognition of the concerns raised by interested parties the Applicant has updated the outline Battery Fire Safety Management Plan **[REP2-032]** and submitted it for Deadline 2. It is considered this provides a detailed plan which ensures that the final design of the BESS will be acceptable and that in the unlikely event of a fire it would be managed safely ensuring the safety of site staff, first responders and the wider community.
REP2-118, REP2-121, REP2-124, REP2-139, REP2-196, REP2-198, REP2-210, REP2-235, REP2-196, REP2-227, REP2-254, REP2-258,	Assessment	Insufficient information has been provided to assess the safety risks of the BESS.	In recognition of the concerns raised by interested parties the Applicant has updated the outline Battery Fire Safety Management Plan **[REP2-032]** and submitted it for Deadline 2. It is considered this provides a detailed plan which ensures that the final design of the BESS will be acceptable and that in the unlikely event of a fire it would be managed safely ensuring the safety of site staff, first responders and the wider community.
REP2-179, REP2-194	Fire risk	Site E33 is less than 600m from our land. We are deeply	In recognition of the concerns raised by interested parties the Applicant has updated the outline Battery Fire Safety Management Plan **[REP2-032]** and

Parties reference	Theme	Summary of issue raised	Applicant's response
		concerned about the lack of regulation with these grid scale batteries and the very real risk of fire and explosion.	submitted it for Deadline 2. It is considered this provides a detailed plan which ensures that the final design of the BESS will be acceptable and that in the unlikely event of a fire it would be managed safely ensuring the safety of site staff, first responders and the wider community. As referenced in the revised Plan the selected BESS system will have completed UL 9540A testing and / or 3rd party fire & explosion testing which quantifies gas emissions, monitors deflagration risks and validates BESS design structural integrity. In worst case scenario BESS incidents, which have resulted in a deflagration event in a BESS container, debris emission was localised within a 25-metre radius from the container. The Applicant has committed to integrating gas exhaust or ventilation systems for BESS containers at the detailed design stage to mitigate deflagration risks. The Applicant is confident that battery performance capabilities, validation testing requirements, regulatory codes and safety standards will have further improved by the time of the detailed design stage. The drafting of the outline Battery Fire Safety Management Plan means the Battery Fire Safety Management Plan will be required to take account and adhere to these documents and so local residents can have confidence that the BESS site conforms to the most rigorous safety standards.
REP2-101	Location	BESS should not be located close to kennels due to fire risk.	In recognition of the concerns raised by interested parties the Applicant has updated the outline Battery Fire Safety Management Plan **[REP2-032]** and submitted it for Deadline 2. It is considered this provides a detailed plan which ensures that the final design of the BESS will be acceptable and that in the unlikely event of a fire it would be managed safely ensuring the safety of site staff, first responders and the wider community.
REP2-100	Regulation	If there was a fire, other projects could be delayed while new regulations are put in place which could delay action to combat climate change.	The Applicant does not feel it is necessary for it to comment on potential future changes to regulations.
REP2-099, REP2-108, REP2-116, REP2-120, REP2-124, REP2-146,	Fire risk	There is a risk of toxic gases/fumes escaping from a battery fire.	In recognition of the concerns raised by interested parties the Applicant has updated the outline Battery Fire Safety Management Plan **[REP2-032]** and submitted it for Deadline 2. It is considered this provides a detailed plan which ensures that the final design of the BESS will be acceptable and that

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-147, REP2-182, REP2-188, REP2-189, REP2-192, REP2-200, REP2-227, REP2-197, REP2-199, REP2-228, REP2-238, REP2-242, REP2-243, REP2-249, REP2-256, REP2-196, REP2-194			in the unlikely event of a fire it would be managed safely ensuring the safety of site staff, first responders and the wider community. Dispersion modelling undertaken in Appendix 16D models a worst case scenario, and shows no risk to health or life outside of the application boundary.
REP2-187, REP2-188	Fume toxicity	The gases in the event of a fire (and there have been many such examples) are lethal if inhaled, literally melting bones from the inside and causing much suffering before a painful death.	As set out in Appendix 16D, the dispersion modelling undertaken is a worst case based on a number of reasonable assumptions set out in the report. HF is the main pollutant of concern. As set out in Appendix 16D, other pollutants, while most certainly emitted from a BESS fire, are not monitored in concentrations sufficient to cause impacts outside of the application boundary. The plume modelling presented in Appendix 16D shows no risk to health or life outside of the application boundary. The modelling assumes a worst-case scenario, and as such provides confidence that there will be no worse environmental impacts than those predicted. However, Appendix 16D commits to specific consequence modelling at the BESS detailed design stage if necessary. Fire fighters would routinely wear full PPE to a fire event involving a battery (e.g. electric vehicles) fire, protecting them from inhalation of fumes close to the fire.
REP2-194	Assessment	The Applicant has not yet determined the cell chemistry to be used, meaning that appropriate fire safety measures cannot be achieved.	Either LFP or NMC cell chemistry will be considered for the detailed design stage. In recognition of the concerns raised by interested parties the Applicant has updated the outline Battery Fire Safety Management Plan **[REP2-032]** and submitted it for Deadline 2. It is considered this provides a detailed plan which ensures that the final design of the BESS will be acceptable and that

Parties reference	Theme	Summary of issue raised	Applicant's response
			in the unlikely event of a fire it would be managed safely ensuring the safety of site staff, first responders and the wider community.
REP2-194	Assessment	Different cell chemistries require different fire safety considerations. The Applicant proposes using either Lithium Iron Phosphate (LFP) or Nickel Manganese Cobalt (NiMnCo) batteries – but have only done modelling on one type (LFP). For the plume dispersion modelling they have only modelled on Hydrogen Fluoride gas, but no other toxic gases. According to Rochdale envelope they are meant to demonstrate worst case scenarios – this has not been done adequately for LFP and not at all for NiMnCo batteries.	As set out in Appendix 16D, information for detailed modelling is not available at this stage of the process. As such detailed consequence modelling will be undertaken, if necessary, once the detailed design is known. The dispersion modelling undertaken in Appendix 16D is a worst case based on a number of reasonable assumptions set out in the report, such as modelling LFP batteries as they release more HF than NiMnCo. HF is the main pollutant of concern. As set out in Appendix 16D, other pollutants, while most certainly emitted from a BESS fire, are not monitored in concentrations sufficient to cause impacts outside of the application boundary. The plume modelling presented in Appendix 16D assumes a worst-case scenario, and as such provides confidence that there will be no worse environmental impacts than those predicted.
REP2-117, REP2-156, REP2-190	Fire risk	Battery storage is untested at this scale.	In recognition of the concerns raised by interested parties the Applicant has updated the outline Battery Fire Safety Management Plan **[REP2-032]** and submitted it for Deadline 2. It is considered this provides a detailed plan which ensures that the final design of the BESS will be acceptable and that in the unlikely event of a fire it would be managed safely ensuring the safety of site staff, first responders and the wider community.
REP2-098A	Fire and rescue	There is no national training plan for training firefighters for a BESS fire and/or explosion.	The UK Fire Chiefs Council is currently producing guidelines for BESS planning and incident response requirements. These guidelines should be available in 2023 and their compliance will be secured through the outline BFSMP.
REP2-230, REP2-243	Fire risk	Is there ease of access to emergency services?	The revised outline Battery Fire Safety Management Plan **[REP2-032]** submitted at Deadline 2 includes indicative BESS site plans. The plans include prevailing wind direction and multiple first responder access point details.

Parties reference	Theme	Summary of issue raised	Applicant's response
			Site access roads are designed to facilitate vehicles in excess of 40 tonnes and turning areas and firefighter BESS observation areas are included in the plans. The Applicant will be working very closely with the Suffolk Fire & Rescue Service to ensure that the Sunnica site design meets all first responder requirements and complies with the highest global and national BESS safety and certification standards. At the BESS detailed design selection stage all relevant authorities will have the opportunity to review equipment and site design specifications.
REP2-104, REP2-197	Battery safety	Are there plans, if there was a fire? If so, what are they?	At the detailed design stage Emergency Response Plans will be drafted in consultation with the Fire & Rescue Service and all key Sunnica stakeholders. Furthermore, the ERP will be modelled on recommendations and templates contained in NFPA 855 (2023), UK Fire Chiefs Council guidelines and EPRI international ERP template (2023).
REP2-196, REP2-243	Fire and Rescue	Cambridgeshire and Suffolk Fire and Rescue have not been consulted.	Both Cambridge and Suffolk FRS have been consulted and will continue to be consulted throughout the DCO process. Suffolk FRS is the lead service for consultation and input into the Sunnica Battery Fire Safety Management Plan.
REP2-116	Location	The proposed BESS system with E18 / E19 of Sunnica's East Site B is only about 700 metres from the Traveller's Site off Elm's Road.	In recognition of the concerns raised by interested parties the Applicant has updated the outline Battery Fire Safety Management Plan **[REP2-032]** and submitted it for Deadline 2. It is considered this provides a detailed plan which ensures that the final design of the BESS will be acceptable and that in the unlikely event of a fire it would be managed safely ensuring the safety of site staff, first responders and the wider community.
REP2-120	Management	We are unconvinced by the expressions as to how these battery installations will be safely managed, how they will be maintained and how they will be safely disposed of.	In recognition of the concerns raised by interested parties the Applicant has updated the outline Battery Fire Safety Management Plan **[REP2-032]** and submitted it for Deadline 2. It is considered this provides a detailed plan which ensures that the final design of the BESS will be acceptable and that in the unlikely event of a fire it would be managed safely ensuring the safety of site staff, first responders and the wider community. Ultimately, BESS safety is a systems approach and the Applicant will produce a Battery Fire Safety Management Plan at the detailed design

Parties reference	Theme	Summary of issue raised	Applicant's response
			stage that encompasses all key BESS system operations & maintenance requirements and site mitigation and safety requirements.
REP2-120, REP2-243	HSE	The Health and Safety Executive (HSE) should be involved in assessing all aspects of the risks to health, safety and the environment that these battery installations will pose.	The Applicant has consulted with the HSE during the preparation of the outline Battery Fire Safety Management Plan **[APP-267]** and it will be consulted when the detailed plan is prepared. This document will be updated during each stage of the project lifecycle and will include ongoing consultations with the HSE and other applicable stakeholders.
REP2-228	Battery safety	BESS fires are particularly problematic in a high voltage environment.	NFPA 855 (2023) confirms water as the preferred agent for suppressing lithium-ion battery fires. Water has superior cooling capacity, is easily accessible in many locations and is easy to transport to the seat of the fire. In training and real-world BESS fire incidents water spray has been demonstrated to be safe as an agent for use on high-voltage systems by firefighters (from appropriate distances). In many recent BESS incidents firefighters have just used water to externally cool adjacent BESS enclosures to minimise any risk of fire spread.
REP2-134	Fire risk	The fact that East Anglia has almost half the recorded rainfall of the UK average means that it is one of the riskiest places in the UK to install battery energy storage compounds due to the dryness.	A dry climate does not increase the risk of a BESS fire safety incident.
REP2-228	Mitigation	BESS systems rely on elaborate control systems responding in time to avoid a dangerous event.	In recognition of the concerns raised by interested parties the Applicant has updated the outline Battery Fire Safety Management Plan **[REP2-032]** and submitted it for Deadline 2. It is considered this provides a detailed plan which ensures that the final design of the BESS will be acceptable and that in the unlikely event of a fire it would be managed safely ensuring the safety of site staff, first responders and the wider community. Ultimately, BESS safety is a systems approach and the Applicant will produce a Battery Fire Safety Management Plan at the detailed design stage that encompasses all key BESS system and site design mitigation and safety requirements.

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-228	Security	BESS safety can be compromised by unauthorised entry to sites.	As outlined in Chapter 16: Other Environmental Topics **[APP-048]**, there will be up to 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 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.
REP2-228	Recovery	Recovery of stranded energy and making safe of a site where an incident has occurred is extremely problematic.	Agreed. This will play a key part of the Emergency Response Planning with first responders at the detailed design stage. Once the BESS battery system is selected for the Scheme, NFPA 855 (2023) guidelines will be followed to ensure that the BESS ERP includes procedures for safe shutdown, de-energising or isolation of equipment / systems under emergency conditions to reduce the risk of fire, electric shock, personal injuries, and for safe start-up or decommissioning of battery modules following cessation of emergency conditions. The BESS OEM and site integrators play a key role in providing operational guidance, typically protocols are adapted from lessons learned during BESS fire testing and certification (UL and / or 3rd party). Battery system (real time) online monitoring data will be available to site personnel, Subject Matter Experts and first responders to assist incident response decision making. The above measures will be secured through the outline Battery Fire Safety Management Plan.
REP2-256	Impact on horse racing industry	Horse owners would be wary of having valuable bloodstock stabled in the vicinity of such installations which would threaten the viability of the Newmarket horse racing industry.	In recognition of the concerns raised by interested parties the Applicant has updated the outline Battery Fire Safety Management Plan **[REP2-032]** and submitted it for Deadline 2. It is considered this provides a detailed plan which ensures that the final design of the BESS will be acceptable and that in the unlikely event of a fire it would be managed safely ensuring the safety of site staff, first responders and the wider community.

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-254	Impact on horse racing industry	Who would pay for loss of revenue to our business if an evacuation was required?	It is considered highly 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 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.
REP2-103, REP2-254, REP2-214	Impact on horse racing industry	How could horses evacuate in time?	Please see response above.
REP2-147	Emergency services	The ability of Fire and Rescue services to respond to a disaster of the scale that would result from a battery fire is untested.	In recognition of the concerns raised by interested parties the Applicant has updated the outline Battery Fire Safety Management Plan **[REP2-032]** and submitted it for Deadline 2. It is considered this provides a detailed plan which ensures that the final design of the BESS will be acceptable and that

Parties reference	Theme	Summary of issue raised	Applicant's response
			in the unlikely event of a fire it would be managed safely ensuring the safety of site staff, first responders and the wider community. Ultimately, BESS safety is a systems approach and the Applicant will produce a Battery Fire Safety Management Plan at the detailed design stage that encompasses all key BESS system and site design mitigation and safety requirements. At the detailed design stage Emergency Response Plans will be drafted in consultation with the Fire & Rescue Service and all key Sunnica stakeholders. Furthermore, the ERP will be modelled on recommendations and templates contained in NFPA 855 (2023), UK Fire Chiefs Council guidelines and EPRI international ERP template (2023). The UK Fire Chiefs Council is currently producing guidelines for BESS planning and incident response requirements. These guidelines should be available in 2023.
REP2-251	Insurance	The green Oak construction of The Ark, means that our buildings insurance premium is already extremely high. (approx. 30% of our total income). Our immediate proximity to the edge of the proposed site and the evidential dangers of fire associated with such sites will unquestionably increase the risk to our building and therefore further increase our building insurance premium.	The outline Battery Fire Safety Management Plan 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 **[REP2-032]** 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.
REP2-243	Fire mitigation	You must have the ability to vent during fire caused by thermal runaway which the BESS footprint does not allow for.	In recognition of the concerns raised by interested parties the Applicant has updated the outline Battery Fire Safety Management Plan **[REP2-032]** and submitted it for Deadline 2. It is considered this provides a detailed plan which ensures that the final design of the BESS will be acceptable and that in the unlikely event of a fire it would be managed safely ensuring the safety of site staff, first responders and the wider community. The revised plan clarifies that BESS ventilation systems are a key safety feature for any lithium-ion BESS system. BESS ventilation and gas exhaust

Parties reference	Theme	Summary of issue raised	Applicant's response
			systems will be validated during UL 9540A testing and / or 3rd party fire and explosion testing. At a minimum the exhaust system will conform to NFPA 69 explosion prevention standards as referenced in the outline Battery Fire Safety Management Plan. The BESS fire suppression system must be able to operate effectively in conjunction with the ventilation / gas exhaust system. NFPA 69 exhaust rate is designed to keep gas level under 25% of LFL (Lower Flammable Limit) and exhaust gases away from BESS openings. Controlled and automatic removal of flammable gases protects first responders and toxic gases are removed in a controlled way allowing for dispersion modelling to be reliably integrated into Emergency Response Planning (ERP).
REP2-243	Assessment	There are no fire safety plans including extinguishment or evacuation.	In recognition of the concerns raised by interested parties the Applicant has updated the outline Battery Fire Safety Management Plan **[REP2-032]** and submitted it for Deadline 2. It is considered this provides a detailed plan which ensures that the final design of the BESS will be acceptable and that in the unlikely event of a fire it would be managed safely ensuring the safety of site staff, first responders and the wider community. Ultimately, BESS safety is a systems approach and the Applicant will produce a Battery Fire Safety Management Plan at the detailed design stage that encompasses all key BESS system and site design mitigation and safety requirements. At the detailed design stage Emergency Response Plans will be drafted in consultation with the Fire & Rescue Service and all key Sunnica stakeholders. Furthermore, the ERP will be modelled on recommendations and templates contained in NFPA 855 (2023), UK Fire Chiefs Council guidelines and EPRI international ERP template (2023). The UK Fire Chiefs Council is currently producing guidelines for BESS planning and incident response requirements. These guidelines should be available in 2023.
REP2-243	Applicant	The Applicant and other people paid by it to report should move to Red Lodge and send their children to the school which is within the 1-mile radius of the	Without any specific area of concern that they wish to verify, the Applicant does not consider that it is necessary to comment.

Parties reference	Theme	Summary of issue raised	Applicant's response
		BESS location. If they refuse, they should state why they refuse.	
REP2-243	Air conditioning	There is little information about the air conditioning proposed for the BESS.	The BESS container HVAC requirement will be decided at the detailed design stage. The Applicant acknowledges that Lithium-ion battery safety and performance parameters are significantly impacted by operating temperature range and variations. Optimum operating temperatures are typically between 20–40◦C. Liquid Cooling Systems (LCS) systems will allow for safer and more efficient BESS performance and will be integrated into the BESS design selected for Sunnica. This is referenced in Table 3 of the outline Battery Fire Safety Management Plan **[REP2-032]**. The latest LCS designs allow for smaller variations in cell operating temperatures, lower energy consumption, earlier detection for potential thermal runaway, active cooling to manage thermal runaway incidents and high ingress protection module designs allowing for safer operating conditions.
REP2-243	Assessment	Tables 3 in Chapter 16 Appendix 16C. In the Risks section there is no mention of batteries as potential risks to human health.	Table 3-13 within Appendix 16C - Framework Construction Environmental Management Plan **[APP-123]** states that an outline Battery Fire Safety Management Plan has been submitted with the DCO Application. This explores the risks associated with fires from BESS equipment and sets out measures to minimise the impact of an incident during construction, operation and decommissioning of the facility
REP2-238	Ecology	BESS fires/accidents have the potential to impact on local wildlife.	The risk of fire is minimal and will be 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 **[REP2-032]**. The measures outlined in this document have been agreed with the Suffolk Fire and Rescue Services. 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

Parties reference	Theme	Summary of issue raised	Applicant's response
			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 effects outlined in this report or cause any significant adverse effects. 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]**.

5.25 Theme 25 – Environment – Soils

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-097, REP2-102, REP2-103, REP2-104, REP2-121, REP2-133, REP2-152, REP2-194, REP2-196, REP2-210, REP2-211, REP2-214, REP2-243, REP2-253A	Agricultural land	The Applicant has graded the land as poor when I understand it to be higher grade.	As stated in the Applicant's Responses to Relevant Representations **[REP1-016]**, 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 Best and Most Versatile Land (BMVL). The ALC assessment (to determine the grades of the soil, and therefore the amount of BMVL within the Order limits) 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.
REP2-211, REP2-214	ALC	The Applicant's assessment has not been cross-checked by an independent survey.	As stated in the Applicant's Responses to Relevant Representations **[REP1-016]**, 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 in agreement with the ALC assessment. 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. 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.
REP2-119	Impact on soil	Digging deep into the ground would heavily impact the environment.	Environmental impacts associated with excavation will be appropriately managed and mitigated through the application of measures in the Framework Construction Environmental Management Plan **[REP3-015]** (see in particular Table 3-7 which includes measures relating to soil).

Parties reference	Theme	Summary of issue raised	Applicant's response
			In contrast to built development or minerals extraction, there will be little movement of soil. The majority of the site will be solar mounted above pasture with minimal disturbance of soil.
REP2-097, REP2-152, REP2-153, REP2-194	Assessment	Droughtiness is overstated as an issue impacting agricultural land in the Scheme area by the Applicant, as is the need for irrigation in this area.	The drought assessment follows the ALC Guidelines (MAFF October 1988). Farmers would not take on the high capital and labour cost of irrigating crops unless it were required for economic production.
REP2-103	Soil quality	Taking versatile land out of production will result in increased intensification of farming on the remaining land, with increased fertiliser and pesticide use, which would seem contrary to the aim of farming in a more sustainable way	Nutrient application is guided by RB209 and pesticide use by the BASIS qualification. Increasing application above the recommended level would not give a linear increase in yield. Development of Sunnica will not increase use of agrichemicals at another location.
REP2-103	ALC	The number of pits dug (6) is not adequate for the land area surveyed and they do not appear to have been dug in areas where the grading changes – these pits were dug for archaeological investigations and not concurrent with auger borings. There are only photographs of two of the 6 locations and no map is provided – in itself a FAIL on the BSSS chart.	The pits dug illustrate the soil types found within the site. All six pits have a grid reference to one meter recorded by GPS so the locations of the pits are clearer than could be recorded on a map. All six pits are at 100m intersections of the OS Grid, as are the auger sample point locations. All six pits are therefore concurrent with auger borings. The photographs are of archaeological trial trenches, not of pits. They are provided because the extensive exposures illustrate the nature of the chalk parent material found over much of the site.
REP2-194	ALC	There are omissions in the ALC assessment which require further investigation in order to avoid loss of BMV land. There is	Detailed ALC assessment of the site, following the guidance of Natural England document TIN049, has found predominantly Grades 3b and 4.

Parties reference	Theme	Summary of issue raised	Applicant's response
		considerably more BMV on the site than Sunnica have stated.	Please also see the first entry in this table, responding to the suggestion that there should be more BMVL within the Order limits.
REP2-103	ALC	The pits do not show wetness class and, in an area high in Ca no lab analysis has been done.	Pits 1, 2, 3, 4 and 6 are all of freely drained soils with no soil wetness limitation. Pit 5 notes ground water wetness on this low lying land. Lab analysis results sheets show results of calcium (Ca) analysis. Please see the Environmental Statement Appendix 12B, Annex F **[APP-115]**.
REP2-103, REP2-111, REP2-121	ALC	The variety of crops grown in the soil increases its value, meaning robust justification for removing it from arable use should be provided regardless of its ALC grade.	The land is not removed from agricultural use. In addition, the Applicant has already set out in its response at Procedural Deadline B **[PDB-001]** why food production is not a principal issue for consideration in the examination, but instead it is the use of BMVL that should be examined given it is BMVL that falls within planning policy and specifically the Energy NPSs, draft Energy NPSs and the NPPF. 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 the Government.
REP2-103	ALC	The maps showing the plots of the auger borings seem to have many which lie on headlands, along field boundaries, even on tracks – so don't reflect the quality within the fields.	Auger borings are placed on 100m intersections of the OS Grid using a GPS reading to 1m. This is a systematic randomised sampling strategy that eliminates surveyor bias in the selection of sample points.
REP2-103	ALC	The ADAS survey undertaken previously over a part of the site has been downgraded one grade because irrigation was used to increase the grade. However, there is no justification shown for changing the entire site and no calculations are shown.	As stated in the Applicant's Responses to Relevant Representations **[REP1-016]**, 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 "As a consequence the grading you referred to would need to be reviewed without irrigation. This would be an acceptable change in grading." When

Parties reference	Theme	Summary of issue raised	Applicant's response
			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.
REP2-194	ALC	Three independent soil specialists have considered the findings of the Applicant and concluded the Applicant's findings are incorrect. They have calculated that up to 60% of the site could be BMV without the upgrade of irrigation. The Applicant and its participating landowners have refused access to the Order limits three times for the soil results to be retested.	The Sunnica site has been surveyed by three different ALC survey teams. One of these was RAC, who found ALC Grade 4 land limited by drought. No irrigation upgrade was applied by RAC who noted that irrigation infrastructure was present. The assessment work by Patrick Stephenson does not survey land within the site, and the survey method does not follow the ALC guidelines. In particular, no drought calculation is made to assess drought limitation.
REP2-103, REP2-104, REP2-124	ALC	Surveys should be done with complete professionalism and lack of bias towards the applicant who will be paying the surveyors fees.	As stated in the Applicant's Responses to Relevant Representations **[REP1-016]**, 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.
REP2-103	Irrigation	Only a small amount of UK agricultural land has the facility to irrigate crops, so such land (such as in the Order limits)	Drought conditions result in farmers' access to abstraction for irrigation being curtailed.

Parties reference	Theme	Summary of issue raised	Applicant's response
		must be preserved in the face of increased drought as a result in climate change.	
REP2-103	Soil erosion	The rotation of crops within the Order limits is such that land remains bare for the shortest time possible, leading to very little erosion by either water or wind. Crops are generally planted across rather than up/down slopes to reduce erosion. Contrast with the Scheme where panel arrays are running downhill with the concentrated water giving the potential for erosion.	As stated in the Applicant's Responses to Relevant Representations **[REP1-016]**, at present the majority of the land is in arable production, with cultivation leaving bare soil vulnerable to water and wind erosion. Bare soil is particularly vulnerable to erosion following potato and root crop harvest as the soil is loosened and has no stubble cover. Bare soil is also found year round on the land under outdoor pigs. 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.
REP2-103, REP2-187, REP2-216	Soil erosion	By removing and damaging the most fertile topsoil erosion reduces soil productivity and, where soils are shallow, may lead to an irreversible loss of natural farmland.	For the Sunnica site, removal of topsoil will only be for the limited extent of access tracks and compound areas. Topsoil below and between solar panel rows will not be removed and will retain a year round sward. Soil handling from the limited extent where topsoil is removed will be guided by the Soil Management Plan (SMP) that forms part of the CEMP. The SMP will ensure the conservation of topsoil function and volume, minimising any loss of material or quality. Please see Tables 3 to 7 of the Framework CEMP **[REP3-015]** and Tables 3 to 6 of the Framework OEMP **[REP2-030]**. As stated in the Applicant's Responses to Relevant Representations **[REP1-016]**, 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.

Parties reference	Theme	Summary of issue raised	Applicant's response
			Farmland by its very nature is not 'natural' and furthermore, agricultural land below and between the solar panels is proposed to be grazed by sheep or other small livestock. As such, agricultural land is retained and not lost.
REP2-103, REP2-194, REP2-196	Nutrients	The fields have been managed to grow high yields of good quality produce. This is achieved by maintaining good levels of nutrients in the soil. These high nutrient levels will result in the growth of highly competitive arable weeds, which will necessitate control by either herbicides or regular mowing – meaning grasses are unlikely to establish.	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 (OLEMP) **[REP3-011]**, compliance with which is secured via Requirements 8 and 9 of the draft DCO **[REP2-012]**. As set out in the OLEMP **[REP3-011]** 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 specific prescriptions dependent upon location across the Scheme. This will predominantly utilise grazing, but mowing may be required in selective areas. The light textured soil has very little capacity to retain nutrients, and in particular nitrate will be depleted very rapidly once N fertiliser is no longer routinely applied.
REP2-120, REP2-124, REP2-194, REP2-196	Soil quality	Land grade is not the only factor facilitating high quality and yield of crops.	As stated in the Applicant's Responses to Relevant Representations **[REP1-016]**, 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).
REP2-124,	Soil quality	Soil structures and nutrients in the ground will be damaged by construction and decommissioning traffic compacting the soil.	Table 3-7 of the Framework Construction Environmental Management Plan **[REP3-015]** describes measures that will be implemented during construction of the Scheme to minimise the risk of damage to soil structure. For example, these include: • No trafficking of vehicles/plant over in situ or bunded soils to occur outside demarcated working areas;

Parties reference	Theme	Summary of issue raised	Applicant's response
			• No trafficking of vehicles/plant on reinstated soil (topsoil or subsoil); • Establish and maintain a grass sward over the Solar PV area before trafficking over by construction plant and delivery vehicles; • Plant and machinery only work when ground or soil surface conditions enable their maximum operating efficiency (i.e. when machinery is not at risk of being bogged down or skidding causing compaction or smearing); • Daily records of operations undertaken, and site and soil conditions should be maintained during soil handling activities; and • Low ground pressure (LGP models) and tracked vehicles should be used where possible when working directly on bare or vegetated soils to minimise the extent and/or intensity of the soil loosening/decompaction required after reinstatement. Table 3-7 of the Framework Decommissioning Environmental Management Plan **[REP2-028]** also includes measures to minimise damage to soil structure during the decommissioning of the Scheme.
REP2-097, REP2-210	Peatland	There are significant pressures on production on our lowland peatlands. Large scale solar installations must avoid productive mineral soils as food production cannot be transferred onto neighbouring Fenland.	Current agricultural production at the Site is heavily dependent on adequate supplies of water for irrigation. More frequent drought conditions like that of 2022 will undermine the current cropping as access to water from rivers and aquifers is cut.
REP2-097	Assessment	Daniel Baird's report fails in three categories set by the BSSS. If there is one failure the Society recommends the work is reviewed.	The ALC assessment for the Site comprises work from three separate teams including MAFF and Reading Agricultural Consultants. These three assessments all comply with the guidance for ALC assessment given by TIN049, and the findings on ALC grade and soil characteristics concur.

5.26 Theme 26 – Environment – Noise

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-139	Construction	Freckenham will be negatively impacted by construction noise.	Table 11-14 of Chapter 11, Noise and Vibration of the Environmental Statement **[APP-043]** provides an assessment of potential construction noise effects at Freckenham (receptor R11). The assessment concludes that construction noise will result in a Negligible effect at Freckenham, which is not significant.
REP2-139	Operational noise	Freckenham will be negatively impacted by operational noise, particularly from the BESS.	Table 11-16 and Table 11-17 of Chapter 11, Noise and Vibration of the Environmental Statement **[APP-043]** provides an assessment of potential operational noise effects at Freckenham (receptor R11). The assessment concludes that operational noise will result in a Negligible effect at Freckenham, which is not significant.
REP2-101	Vibration	Vibration will cause damage to houses.	The assessment of vibration induced from construction activities is based on human disturbance, which occurs at a vibration level lower than that which may cause cosmetic damage to properties. The vibration assessment, as set out in Chapter 11, Noise and Vibration of the Environmental Statement **[APP-043]**, indicates that, at worst, levels of construction induced vibration might just be perceptible in residential environments and would not be at a level that may result in cosmetic damage to properties. No perceptible levels of vibration will be generated from any solar farm infrastructure so there will be no risk of disturbance or cosmetic damage to properties.
REP2-101, REP2-234	Transport	There will be traffic noise from a significantly increased flow of construction traffic.	Construction traffic associated with Sunnica West Site A and B would, on average, be equivalent to five HGV movements per hour with up to ten movements per hour occurring during the peak period. Construction traffic associated with Sunnica East Site A and B would, on average, be equivalent to four HGV movements per hour with up to five movements per hour during the peak periods. The level of construction traffic is not

Parties reference	Theme	Summary of issue raised	Applicant's response
			considered sufficient to result in disruption, with the exception of Sunnica West Site A and B traffic during peak periods. The majority of construction traffic will be associated with Sunnica West Site A, which is substantially larger than Sunnica West Site B. The primary access route to Sunnica West Site A will be from La Hogue Road, which is accessed directly from the A11. There are no sensitive receptors located along the primary Sunnica West Access route that would be impacted by construction traffic noise.
REP2-107	Operational noise	The noise caused by the panels has not been properly assessed.	Photovoltaic panels do not generate any noise. Operational noise is generated by battery storage, transformers and inverters. These sources of noise have been considered in the operational noise assessment in Chapter 11, Noise and Vibration of the Environmental Statement **[APP-043]**.
REP2-124, REP2-224	Noise	There will be noise during construction.	Table 11-14 of Chapter 11, Noise and Vibration of the Environmental Statement **[APP-043]** provides an assessment of potential construction noise effects. The assessment concludes that construction noise will result in a Negligible effect, which is not significant.
REP2-124, REP2-224	Operational noise	There will be sound disturbance from the electrical equipment over the Scheme's operation.	Table 11-16 and Table 11-17 of Chapter 11, Noise and Vibration of the Environmental Statement **[APP-043]** provides an assessment of potential operational noise effects. The assessment concludes that operational noise will result in a Negligible to Minor Adverse effect, which is not significant.
REP2-134, REP2-218, REP2-222	Noise general	There will be general noise impacts.	Table 11-14 of Chapter 11, Noise and Vibration of the Environmental Statement **[APP-043]** provides an assessment of potential construction and decommissioning noise effects. The assessment concludes that construction and decommissioning noise will result in a Negligible effect, which is not significant.

Parties reference	Theme	Summary of issue raised	Applicant's response
			Table 11-16 and Table 11-17 of Chapter 11, Noise and Vibration of the Environmental Statement **[APP-043]** provides an assessment of potential operational noise effects. The assessment concludes that operational noise will result in a Negligible to Minor Adverse effect, which is not significant.
REP2-157, REP2-228, REP2-236	BESS	The BESS will generate constant annoying noise, including from their cooling systems.	Table 11-16 and Table 11-17 of Chapter 11, Noise and Vibration of the Environmental Statement **[APP-043]** provides an assessment of potential operational noise effects, which includes noise emissions from the proposed BESS areas in addition to substations and inverters. The assessment concludes that operational noise will result in a Negligible to Minor Adverse effect, which is not significant. Whilst operational noise may be perceptible, it is not of sufficient magnitude to result in a material change in behaviour.
REP2-199	Operational noise	The constant humming noise emanating from the battery storage will be annoying.	Low frequency hum can be difficult to predict with a high level of certainty and similarly hard to identify and resolve if present. This is because it can be generated by the unexpected interactions between system components and can be amplified by the geometry of the site and receptor buildings. The issue of low frequency noise will be appropriately mitigated (through isolation and attenuation measures). This commitment will be included as part of the design principles.
REP2-173	Construction	The noise of driving solar panels into the ground will cause horses to be spooked.	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 engagement is secured in the Outline Construction Environmental Plan (CEMP) submitted at Deadline 2 **[REP2-026]**, and the detailed CEMP is required to be substantially in accordance with the Outline CEMP under Requirement 16 of the draft DCO.

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-253A	Equine industry	HGVs would introduce unwelcome and potentially harmful noise, vibration and disruption to the relatively quiet equine establishments including studs where the breeding of valuable racehorses takes place and which depends upon relative peace and quiet with no sudden noise and disturbance. Due to the vulnerable nature of horses, it can cause significantly greater harm than to a normal user of land including an ordinary agricultural unit.	As per the Applicant's responses to Relevant Representations **[REP1-016]** 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. A point of contact will be available with the Contractor to liaise with the horse racing and training community and other neighbours. This commitment to engagement is secured in the Outline CEMP submitted at Deadline 2 **[REP2-026]**, and the detailed CEMP is required to be substantially in accordance with the Outline CEMP under Requirement 16 of the draft DCO.
REP2-236	Operational noise	Residents of Burwell have complained about noise associated with the substation and BESS at that location. Sunnica East Site A stands to do the same to nearby properties. This will be particularly impactful during the summer and at night.	The proposed Burwell National Grid Substation Extension – Option 1 has been removed 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 operation of the Scheme.
REP2-238	Equestrian impact	Noise during operations will disturb horses and can cause them to spook.	Horses and humans share the most closely related hearing ranges of any other mammals on the planet. The British Horse Society (BHS) state that "A horse's range of hearing is greater than a human to higher frequencies (over 33 kHz in the horse compared with under 20 kHz in humans) although a horse may not be able to hear the lowest frequencies audible to humans" ([redacted]). The BHS go on to state that: "Horses can become difficult to handle in conditions where there is a continuous

Parties reference	Theme	Summary of issue raised	Applicant's response
			level of noise because it may mask other sounds that could be a threat". Examples are provided of noise sources that may affect a horse as "gunshot, motorway, train", which are all considered to generate high levels of noise. Noise predictions presented in Figure 11-4 of the ES indicate operational noise levels of approximately 40 dB LAeq,T at the worst-affected bridleway locations, which are adjacent to Sunnica West Site A. This level of noise is likely to be perceptible, but can be compared as equivalent to a quiet residential area. Consequently, this level of noise is unlikely to cause disturbance to equestrian users.

5.27 Theme 27 – Environment – Arboriculture

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-108, REP2-161	Trees and hedgerows	There will be damage/removal of many existing trees and hedgerows.	The design has been developed to minimise tree loss. The extent of tree removal to facilitate the Scheme is considered in the Arboricultural Impact Assessment Report **[EN010106/APP/8.46]** and Tree Protection and Removal Plan submitted at Deadline 3. This identifies that 1.76ha of tree canopy cover will require removal (as a reasonable worst case). 52ha of new tree and woodland planting is proposed and this will far outweigh the area of trees to be removed and will result in a gain in tree cover of over 50ha. Up to 1.068km of hedgerow loss is anticipated to facilitate the Scheme however 7.4km of new hedgerow planting is proposed (resulting in a gain of over 6.3km of new hedgerow). Overall the scheme will result in a substantial increase in tree cover and hedgerow extent and this will be secured through the Outline Landscape and Ecological Management Plan (OLEMP) the latest version of which was submitted to the Examination at Deadline 3.
REP2-122	Woodlands	The Scheme would result in the loss of woodland.	Part of four woodland groups are identified for removal, these relate to the requirement for access and cable corridors and only affect small sections of narrow field boundary tree belts. A maximum of 4250m^2 of surveyed woodland canopy is likely to require removal and this will be reduced in practice where feasible. Unavoidable tree loss will be mitigated with substantial new planting which will result in an overall increase in tree cover.
REP2-202	Woodlands	The Scheme would result in the destruction of ancient trees and landscapes.	As stated in the Arboricultural Impact Assessment Report **[EN010106/APP/8.46]**, no ancient or veteran trees are to be removed to facilitate the Scheme and no ancient woodland is to be impacted. Whilst it is noted that minor works will need to be undertaken to a veteran tree as part of providing access to West Site B, as noted in the Heritage and Substation Connection Update note also submitted at Deadline 3A, the Applicant proposes to remove this Site, meaning that this impact would be avoided.

Parties reference	Theme	Summary of issue raised	Applicant's response
			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.

5.28 Theme 28 – Environment – BESS

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-100, REP2-208	Experience	The Applicant has never developed a BESS before.	BESS is a relatively new technology and many UK solar developers have not developed this before. The Applicant team has included a battery designer from Solaer, a Spanish solar developer, coupled with a safety management consultant within AECOM and a safety and testing consultant for batteries at BST&T, all of whom have considerable experience in BESS.
REP2-243	Assessment	There is no mention of BESS in the EIA or the PEIR.	BESS is mentioned many times in the PEI Report and ES. It has been thoroughly assessed in both reports, with only minor changes to the design of the BESS following statutory consultation (as explained in the Design and Access Statement).
REP2-104	Scale	Why do they require such a large area for the batteries?	The application is applying for maximum parameters and the detailed design can therefore use the full areas designated for BESS or build the BESS smaller. The area has been selected to provide flexibility to allow a range of battery manufacturers and technologies. Indicative designs submitted with the outline Battery Fire Safety Management Plan **[REP2-032]** indicate that the areas shown for BESS on the works plans will not use all of the space for BESS.
REP2-098A, REP2-100, REP2-101, REP2-120, REP2-124, REP2-258, REP2-147, REP2-166, REP2-228, REP2-235, REP2-194	Regulation	BESS are not currently considered to be hazardous material which means they are inadequately regulated.	The BESS is well regulated in the UK. BESS is relatively new and some of the previous BESS developments in the UK and globally which experienced problems were built to a less robust standard than is required now.
REP2-133	Contamination	The BESS could contaminate the ground.	Paragraph 16.4.13 and 16.5.27 of Chapter 16 Other Environmental Topics of the ES **[REP2-024]** explains that each BESS area would be lined with an impermeable surface (such as concrete) and also bunded, which will protect the ground from leak risks or from firewater (should this be created in the unlikely event of a fire). This is secured by Requirement 7 of the draft DCO which requires a Battery Fire Safety Management Plan (BFSMP) based on the Outline BFSMP which includes these control principles.

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-104	Minerals	What are the minerals that will be used in the BESS? Where will these minerals be sourced from?	The battery technology, manufacturer and supplier have not been selected and a procurement exercise will be carried out after a decision on the DCO consent. The Applicant's procurement strategy will include ethical and environmental considerations.
REP2-104	Location	What, in the Applicant's opinion is a safe distance for schools and residential properties?	The Outline Battery Fire Safety Management Plan **[REP2-032]** presents a discussion on the risks of explosion and fire and the safety measures incorporated into the design. The Unplanned Atmospheric Emissions from battery Energy Storage Systems **[REP2-264]** assesses the risk of inhalation from an unlikely, unplanned fire event. UK limits for protection of human health are generally met within the Order limits (the Site) itself, or where it extends outside the Order limits, within a few metres of the Order limits. This is despite the worst case assumptions taken in the assessments. There is no risk of harm or health effects from the BESS identified at any residential properties.
REP2-209	Assessment	Dame Maria Millar is trying to bring a bill to Parliament that all lithium-ion battery storage units are categorized as hazardous so that the Environment Agency, the Health and Safety Executive and the Fire Service would be statutory consultees when planning applications are considered. If the relevant authorities mentioned in the bill were to be involved, I doubt this project would go ahead at its current proposal.	The Environment Agency, the Health and Safety Executive and the Fire Service were all consulted on the BESS proposals at statutory consultation and following statutory consultation. Their comments and feedback have been extremely helpful in the design of the BESS and are reflected in the updated Outline Battery Fire Safety Management Plan **[REP2-032]**.
REP2-232	Technology	The BESS technology proposed is out of date.	The technology is evolving continually, which is why the Applicant has sought to allow for flexibility with regards to the battery technology. For example, if more efficient technology is manufactured in the future that is

Parties reference	Theme	Summary of issue raised	Applicant's response
			cheaper and uses less space than today's battery technology, the Applicant would not want to be restricted from procuring this.
REP2-210, REP2-243	Information	The Applicant has yet to provide comprehensive factual information – errors/omissions, incomplete/ misleading information in respect of size/scale and location of Battery stations.	The Applicant has provided sufficient information for the assessment of environmental and social impacts, and to enable the Secretary of State to determine the application. It is understood that the local communities would like further information and as a result the outline Battery Fire Safety Management Plan was updated at Deadline 2 **[REP2-032]** which provides additional information on the BESS. It is considered that this is far more detailed than has been necessary to bring forward on other applications including BESS.
REP2-214	Battery replacement	A further key issue omitted by the Applicant is that every ten years the batteries will need to be replaced. So, over a forty-year life, they will have to be changed at least three times with the concomitant dangers of moving volatile and flammable objects.	The risk can be adequately managed by the Applicant. The Outline Battery Fire Safety Management Plan discusses the risks and control measures for handling, storage and transport of batteries.
REP2-243	Scale	Recently the Applicant changed the battery size to 10m. This is dangerous. It has done this so they can compromise and still get battery size of 6m. If granted, it will then re-apply for 10m high batteries.	The Applicant is not expecting to modify the design after consent. This can be a difficult and lengthy process. The maximum parameters for which consent is being sought are expected to be sufficient.
REP2-243	Technology	There will be no manufacturing quality control or quality assurance and the battery supplier is not known.	The batteries will need to adhere with UK legislation and the procurement strategy will focus on reliable, trusted suppliers with a strong reputation in battery development. A procurement exercise will be carried out after consent to identify a short list of preferred suppliers. Table 4 of the Outline Battery Fire Safety Management Plan **[REP2-032]** presents the applicable safety standards that will apply to the BESS, which

Parties reference	Theme	Summary of issue raised	Applicant's response
			include requirements for quality control. The BESS will adhere with these standards.
REP2-243	Battery replacement	Batteries will need replacing every 5000 recharges, therefore over 40 years they will need to be replaced up to three times. Who would pay and where would the replacements be sourced from?	The operator would pay for any maintenance and repairs in the Scheme. The batteries would be sourced from a reliable, trusted supplier, most likely the same as the provider for the original batteries. A procurement exercise will be carried out after consent to identify a short list of preferred suppliers.
REP2-243	Assessment	No expert on battery design was consulted by the Applicant.	The Applicant team has included a battery designer from Solaer, a Spanish solar developer, coupled with a safety management consultant within AECOM. A safety and testing consultant for batteries at BST&T has been instructed since the Application was accepted for examination and has been heavily involved in the revised draft of the outline Battery Fire Safety Management Plan.
REP2-243	Terrorism	The BESS could be a terrorist target.	The Applicant does not consider the BESS to be high risk terrorist target. It is less explosive than other community assets in the county, nor would it affect the national grid as much as targeting other assets offsite.

5.29 Theme 29 – Environment – Telecoms, TV, Utilities

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-255	Utilities	There is a worrying lack of detail concerning the installation and delivery of the grid connection cable in the Design and Access Statement.	Although the Design and Access Statement **[AS-312]** includes some details of the installation and delivery of the grid connection, it is Chapter 3: Scheme Description **[REP2-022]** which provides the detailed description of the Scheme. As is established practice, the Applicant has assessed the Scheme's impact according to the Rochdale Envelope method of considering the maximum parameters of the Scheme, as outlined in Chapter 5: EIA Methodology **[APP-037]**. In terms of the cable route this includes the maximum developable area and depth and location of the cable. The assessment approach has provided a worst-case scenario of the impacts of the Scheme which have been assessed in the Environmental Statement. The maximum design parameters for Grid Connection Route A and B are documented in Appendix B of the Design and Access Statement **[AS-312].** The Framework Construction Environmental Management Plan (CEMP) **[REP3-015]** includes measures to manage and mitigate environmental impacts and to protect the environment in relation to the construction of the Grid Connection Route A and B. Pursuant to the Requirements in the draft DCO **[REP2-012]**, the appointed contractor will be required to prepare a detailed CEMP for approval prior to the commencement of construction.
REP2-184	Utilities	Opposition to cable installation under land.	The cable within Grid Connection Route A and B will be buried up to 2m below ground level. Following construction, the land will be re-instated and returned to the landowner (with permanent rights retained in the land for the cable, and the ability to access / maintain it).

5.30 Theme 30 – Funding

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-098A, REP2-101, REP2-107, REP2-135, REP2-186, REP2-208, REP2-213	Decommissioning	There is no provision of funds for cleaning up the impact of the Scheme afterwards.	There is no justification for funds to be put into place. The Applicant has committed to decommissioning the Scheme and this is secured by requirement 22 of the draft DCO. 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. The decommissioning and environmental management plan will ensure that the land is returned to the state it was in prior to construction commencing. 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. The breach of a DCO is a criminal offence. 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.
REP2-100, REP2-120, REP2-166, REP2-182, REP2-214	Decommissioning	The Applicant should be required to deposit an inflation-linked bond to cover the cost of decommissioning at the start of the project.	There is no justification for a decommissioning bond to be put into place. The Applicant has committed to decommissioning the Scheme and this is secured by requirement 22 of the draft DCO. 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. The breach of a DCO is a criminal offence. This same approach has been used on previous solar scheme projects and the requirement to provide a decommissioning fund is not common

Parties reference	Theme	Summary of issue raised	Applicant's response
			place. Neither the undertaker for Little Crow or Cleve Hill have been required to provide one.
REP2-100	Financial capability	If the Applicant runs out of funding, the Secretary of State will either have to fund the restoration of the land or fund the completion of the project with a new supplier.	The Applicant has outlined how it proposes to fund its DCO obligations in the Funding Statement **[APP-023]**. There would be no requirement for the Secretary of State to fund the Scheme as described.
REP2-100, REP2-101, REP2-118, REP2-166, REP2-241, REP2-253A,	Financial capability	The Applicant has not displayed sufficient evidence that it has financial capability to deliver the Scheme.	The Applicant has outlined how it proposes to fund its DCO obligations in the Funding Statement **[APP-023]**. It is considered that this demonstrates how the Scheme would be funded should development consent be granted. This funding approach is consistent with how many schemes are funded in the market.
REP2-098A	Funding Statement	The Funding Statement contains incorrect and misleading information, e.g., financial companies for UK companies are not provided.	The Applicant is not aware of any misleading information in the Funding Statement.
REP2-098A	Costs	The cost of developing the Scheme is much larger than claimed in the Applicant's Funding Statement.	The Applicant has estimated and budgeted the costs of the Scheme to the best of its knowledge, working with its expert consultant team. It considers that the estimated cost is accurate.
REP2-098A	Applicant	Companies related to the Applicant should publish their latest accounts on Companies House before the Scheme is granted consent.	All the companies related to the Applicant have up to date filings on Companies House.
REP2-098A	Viability	An independent viability study of the Scheme should be produced.	It is unclear why an independent viability study is required. The Scheme is not seeking financial support from central government and therefore there is no reason why a viability study should be required. It is for the Applicant

Parties reference	Theme	Summary of issue raised	Applicant's response
			to satisfy itself that the Scheme is viable before it commences construction.
REP2-215	Financial	The Scheme has caused a heavy financial impact on local communities.	It is not clear what the financial impact is which is referred too. The Applicant entered into voluntary planning performance agreements with the host authorities both pre-submission and for the pre-examination phase which provided the host authorities funding for this process.

5.31 Theme 31 – Legal

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-100	Comment	If this project was the subject of a government procurement process, it would not meet the criteria for selection.	The Application is being promoted by Sunnica Limited and the corporate structure of that company is explained in the Funding Statement [**APP-023**]. It is noted that the Scheme is not a government procurement process and is not publicly funded and as such the procurement rules do not apply to it. However, the Applicant would highlight that it has considerable experience of bringing forwards solar energy Schemes. The Funding Statement explains how the ultimate parent of Sunnica Limited is Solaer Holding SL and Appendix B to that document outlines the considerable experience that it has in the construction and operation of solar schemes.
REP2-098A, REP2-142	Compulsory acquisition	The use of compulsory acquisition powers is a violation of human rights.	The Applicant respectfully disagrees. The exercise of compulsory acquisition powers on any project does have the potential to infringe the rights of persons who own property or have rights in land proposed to be acquired. However, section 10 of the Statement of Reasons [**REP2-018**] explains why it is not considered that the authorisation of compulsory acquisition powers over affected persons land would infringe their human rights in respect of the Scheme.
REP2-134, REP2-182,	Compulsory acquisition	Compulsory acquisition is highly unethical.	The Applicant respectfully disagrees. Parliament has decided that compulsory acquisition of land and rights in land is permissible when the statutory code is followed. In the case of nationally significant infrastructure projects the Planning Act 2008 allows an applicant promoting a nationally significant infrastructure project to apply to the Secretary of State to be provided powers of compulsory acquisition. The Applicant explains in its Statement of Reasons [**REP2-018**] the reasons why it considers that it has met the statutory requirements of the Planning Act 2008 and why the Secretary of State should grant it powers of compulsory acquisition.
REP2-121, REP2-255, REP2-210	Compulsory acquisition	Obtaining numerous access points through land acquired via compulsory purchase acquisition is unacceptable.	In all cases the Applicant wishes to obtain the rights and land it requires for the Scheme by voluntary agreement. It has been actively seeking to do this as indicated in the Statement of Reasons [**REP2-018**] and Schedule of Negotiations and Powers Sought [**Document 4.4, REV04**]

Parties reference	Theme	Summary of issue raised	Applicant's response
			However, it is recognised that some land owners will not wish to participate in negotiations. In these circumstances the Secretary of State has the ability to grant powers of compulsory acquisition to applicants for development consent provided the legal requirements set out in the Planning Act 2008 are met. This is warranted to ensure that the Scheme can be built, maintained and operated, and so that the Government's policies are met in relation to the timely provision of new generating capacity and meeting net zero carbon emissions targets for 2050.In other words there is a compelling case in the public interest that powers of compulsory acquisition are granted to the Applicant. The Applicant considers that it has demonstrated that it has complied with the requirements of the Planning Act 2008 and the compulsory acquisition code.
REP2-098A	Compulsory acquisition	The Applicant has not justified the need for CA under the criteria set out in the Planning Act 2008.	The Applicant respectfully disagrees. It submitted with its Application a Statement of Reasons [**REP2-018**]. In Section 5 of this document the Applicant sets out the need for the compulsory acquisition powers that it seeks in the context of the statutory requirements under section 122 of the Planning Act 2008.
REP2-124, REP2-255	Compulsory acquisition	This Scheme not viable without unwelcome compulsory purchases & leases.	Viability and feasibility are different considerations. It is true that assuming that not all land and interests in land can be acquired by voluntary agreement that the Scheme would not be feasible without powers of compulsory acquisition being granted by the Secretary of State to the Applicant. That is the precise reason why the Planning Act 2008 contains powers which enable the Secretary of State to grant powers of compulsory acquisition to the Applicant where certain legal tests are met. This ensures that Government's policies are met in relation to the timely provision of new generating capacity and meeting net zero carbon emissions targets for 2050.
REP2-098A, REP2-104, REP2-120,	Compulsory acquisition	The Applicant has used threatening tactics to exercise their right of CA.	It has never been the intention of the Applicant to use threatening tactics. In all cases it wishes to seek to acquire land and rights in land by voluntary agreement. That is its overriding objective.

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-161, REP2-243, REP2-255			It is correct though that if agreement is unable to be reached by negotiation then the Applicant would seek to rely on powers of compulsory acquisition provided such powers are granted by the Secretary of State. This approach is common place whenever large developments are brought forward.
REP2-098A, REP2-118,	Human rights	The Applicant admits in it's Application there will be some instances where it will infringe a person's human rights.	The Applicant accepts, as with any project, that the granting of powers of compulsory acquisition has the ability to infringe a persons human rights under the European Convention of Human Rights. However, that infringement can be lawfully exercised where, in this case, the provisions of the Planning Act 2008 are adhered to. The Statement of Reasons explains why any infringement of the Convention rights of those whose interests are affected by the inclusion in the Sunnica DCO of powers of compulsory acquisition, is proportionate and legitimate and is in accordance with national and European law. The Applicant considers that there is a compelling case in the public interest for the exercise of such powers of compulsory acquisition.
REP2-098A, REP2-186	Liability	The Applicant does not have a public liability or commercial insurance policy in place, which is likely to be expensive and affect the Scheme's viability. Without a policy in place, the Scheme will not be able to proceed.	Sunnica does have a public liability insurance policy in place with sufficient cover for the risks that are deemed necessary at this stage in the development process. This insurance policy is kept under review and will be expanded ahead of the start of construction or any other additional works being undertaken to ensure that the cover in place is appropriate.
REP2-230	Decommissioning	The Scheme must be subject to a legal requirement to decommission it.	The Scheme is subject to a requirement for it to be decommissioned which must occur no later than 40 years after the date of final commissioning. Please see requirement 22 of the draft Development Consent Order [**REP2-012**]
REP2-098A, REP2-099, REP2-118, REP2-132, REP2-208, REP2-251,	Decommissioning	The Applicant will sell the Scheme on after consent which means they have no personal or legal liability to decommission it. Accountability for decommissioning should be made clear.	The Applicant does not intend to sell the Scheme after consent. In any event, the requirement to decommission the Scheme in accordance with requirement 22 is not specific to Sunnica and will apply to whoever is the undertaker at the point decommissioning is required. The undertaker is currently Sunnica but Article 33 of the DCO does allow the benefit of the DCO to be transferred to another party. The exercise of

Parties reference	Theme	Summary of issue raised	Applicant's response
			any transfer will generally be subject to the consent of the Secretary of State except for in defined circumstances explained in Article 33.
REP2-243	Works	There appears some work already being carried out in W15 at the very top but it is unclear if it's just the surrounding area for the buildings already located there. An earth wall has been prepared and earth movers are at work. The Applicant needs to comment.	Sunnica is not and has not undertaken any works in W15 relating to the construction of the Scheme. Survey works have been carried out to inform the DCO submission documents.
REP2-097	Applicant	The Applicant has refused to pay AGW's legal bills.	The Applicant confirmed in its letter (also sent by email) dated 10 November 2020 (ref: 661666.07002/JD52) that they would be unable to agree to pay associated legal costs in the event that the access licence does not complete due to inaction on the part of the landowner. This was agreed prior to negotiations commencing for the related access licence.
REP2-098A	Applicant	Require confirmation that a mistake has been made in APP267 page 5.2.4 Outline Fire Safety Management Plan where it is stated one of Scheme's owners is Tribus Clean Energy Ltd.	The respondee is correct, this is an error in the report. Tribus Clean Energy Limited is not an owner of Sunnica Limited. The corporate structure of Sunnica Limited is set out in the Funding Statement [**APP-23**].
REP2-243	Applicant	There are a number of shell companies backdated, which are deliberately used to get out of liabilities.	The Applicant respectfully disagrees. The corporate structure of Sunnica Limited and its parent companies are set out in the Funding Statement [**APP-023**].
REP2-116	Property prices	Will there be any liability from the Applicant for the negative impact on property prices in the area?	There is no evidence that the Applicant is aware which shows that the Scheme will lead to a reduction in property prices.
REP2-097, REP2-161, REP2-255	Land	Negotiations between the Applicant and landowners have been conducted in an unsatisfactory manner.	The Applicant respectfully disagrees and has sought to accommodate landowners' views, both practical and commercial, in its negotiations. The Applicant summarises the correspondence in the Schedule of Negotiations and Powers Sought [EN010106/APP/4.4].

Parties reference	Theme	Summary of issue raised	Applicant's response
REP2-097	Heads of Terms	AGW was surprised to read in the Heads of Terms clause 6.1 under Planning and Promotion – 6.1.1 'the landowner will not object or cause any objections to the developer's application for DCO, either in principle or in relation to the particulars of the drafting of the DCO nor object to any applications submitted to the local planning authority.'	The Applicant does not consider it unreasonable to include such a clause in a voluntary agreement, as if the landowner agrees to grant the necessary land rights then it follows that there should not be an objection to the DCO application. As with all Heads of Terms, they are a negotiation which is what the Applicant is seeking to do in order to reach voluntary agreement.
REP2-208	Planning process	If the Application has no chance of success, it should be thrown out at an early stage. The system is flawed if my understanding is correct and the ExA should be contacting government to get the planning laws changed.	The Applicant does not feel it is necessary for it to comment on suggested changes to planning laws.

Appendix A Cranfield University Response

Appendix A Applicant's response to Cranfield University's report on carbon emissions

A.1.1 Introduction

A.1.1.1 This paper sets out an initial response from the Applicant to the Cranfield University "Findings on the Proposed Sunnica Energy (Solar PV) Farm" [REP2-240g], submitted by Say No to Sunnica at Annex F of its Written Representation. Where appropriate, clarifications have been provided below to try to close out queries raised. A further response providing additional supporting information will be submitted at Deadline 4.

A.1.1.2 Where assumptions presented by Cranfield University and the assumptions supporting the calculations presented in Chapter 6: Climate Change of the Environmental Statement (ES) [APP-038] differ, the Applicant will undertake sensitivity testing to demonstrate the impact of such changes. However, where the Applicant disagrees with any assumptions presented within the Cranfield University report, the Applicant will not include these in the sensitivity testing, but will present justification for their exclusion.

A.1.1.3 The Applicant will also include a number of scenarios within this sensitivity testing to assess the impact of different ground coverage and different BESS options in order to ensure that the results cover a wider range of potential future technology and constraint driven configurations of the Scheme. The purpose of this sensitivity testing is to confirm the Application's conclusions of the carbon benefits of the Scheme. This sensitivity testing is being submitted at Deadline 4 rather than with this response as the compressed nature of the deadlines at this stage of the examination means that it has not been possible to finalise the sensitivity testing. The preliminary findings of the sensitivity testing can also be discussed at the forthcoming Hearings before they are confirmed in writing at Deadline 4.

A.1.1.4 In the absence of the sensitivity testing, however, it should be noted that the GHG assessment presented in the ES (and therefore the calculations undertaken by Cranfield University) are considered to be very conservative for the following reasons.

a. The comparison to the grid average is considered conservative as over the lifetime of the Scheme, electricity generated will not necessarily be replacing grid average energy generation, but is expected to replace more high-carbon sources of electricity such as fossil fuel energy generation, to enable the grid to decarbonise as quickly as is required to meet the Government's net zero commitments. National Grid, in the 2022 Future Energy Scenarios report[1], states "*Most of the required emissions reduction across the economy between now and 2050 comes from reducing demand and replacing fossil fuels with renewables or low carbon alternatives.*"

b. The comparison with the UK grid average emissions projections is also not considered a like-for-like comparison as the grid average projections account for considerable uptake of renewable energy, including solar power, to achieve the projected decarbonisation. Therefore, it is conservative to assess the benefits of a scheme which is essential for grid decarbonisation, against

[1] National Grid (2022). *Future Energy Scenarios*. Available at: [redacted] [Accessed 25/11/2022].

the outcome assuming that the Scheme, and many multiples of it, have already been deployed.

c. The methodology paper for the UK Government GHG conversion factors[2] (which includes the UK grid electricity emission factors) states "*These factors include only direct CO_2, CH_4 and N_2O emissions at UK power stations and from autogenerators, plus those from the proportion of imported electricity*". These factors do not include any emissions associated with the maintenance of power generation facilities, or operational activities such as worker travel. Therefore, the comparison of the operational GHG intensity of the Scheme against the UK grid factors is not a like-for-like comparison. Removing maintenance and worker travel emissions from the Scheme operational GHG intensity figure, to achieve a like-for-like comparison, would result in the Scheme comparing even more favourably against the grid average than is presented in the ES, and much more favourably than the modelling presented in the Cranfield University report.

d. The GHG modelling presented in the ES and in the Cranfield University report do not attempt to quantify the GHG benefits achievable as a result of the increased flexibility resulting from the installation of the BESS. However, this increased flexibility has a crucial part to play in the decarbonisation of the grid.

e. GHG emissions associated with the replacement of components over the operational lifetime of the Scheme are based on current emissions factors. However, product replacements in the future will likely be lower-carbon due to expected decarbonisation of manufacturing, transportation and construction processes.

A.1.1.5 The Applicant therefore considers that the sensitivity testing to be undertaken will demonstrate, and will confirm, that the GHG impact of the Scheme does have a beneficial impact on the climate as already reported in the Application material.

A.1.2 Assumptions in the Environmental Statement

A.1.2.1 This section of the Applicant's response seeks to clarify some of the Scheme specifications and assumptions that were queried in the Cranfield University report.

A.1.2.2 Within the Cranfield University report, it was suggested that "*Sunnica may have overestimated their energy output at 23.5 TWh, unless they are intending an installed capacity of at least 625 MWp*". The installed capacity of the Scheme as modelled for the GHG calculations presented in the ES was assumed to be 636MWp. This assumption was based on the candidate design which used a 550W panel across the site at DCO submission stage. Therefore, all modelling undertaken by Cranfield University using the 500MWp scenario should be discounted. As outlined above, further sensitivity testing will be undertaken to explore the impact of a number of alternative design scenarios, which will range from 600MWp to 625MWp. This represents a reasonable worst-case range allowing for a reduction in developable area of up to 25 hectares owing to potential constraints and the installation of 575W panels across the entire site.

A.1.2.3 The Cranfield University report also queried the MWh rating of the BESS, modelling three scenarios: 500MWh, 1026MWh and 1511MWh. The BESS

[2] UK Government (2022). *2022 Government Greenhouse Gas Conversion Factors for Company Reporting: Methodology Paper for Conversion factors Draft Report*. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1083857/2022-ghg-cf-methodology-paper.pdf [Accessed 25/11/2022].

associated with the Scheme, as assessed in the ES, is 514.8MWh. The sensitivity testing to be undertaken will also explore the potential impact of larger 2-hour and 4-hour BESS systems (approx. 1050MWh and 2100MWh), which will require additional BESS infrastructure. BESS technologies and their deployment are evolving rapidly and it is possible that a 2-hour or 4-hour BESS would be optimal.

A.1.2.4 The Cranfield University report points out that transformers, module supports and cables are not included in the embodied energy/ GHG emissions benchmark table in the ES (which is replicated in the Cranfield University report as Table 1), and it is noted that Cranfield University have therefore estimated GHG emissions associated with these assets using their own methodology. To confirm, the embodied carbon associated with these assets was included in the calculations presented in the ES. They were not included in the embodied energy/ GHG emissions benchmark table as the embodied carbon associated with these assets was calculated based on the weight and assumed material composition of each asset, not using a benchmark.

A.1.2.5 As outlined in the Cranfield University report, the ES does not list the replacement rate assumed for the BESS. This is an omission in the report. To be clear, though, maintenance was assumed for the BESS. However, the maintenance rate assumed for the calculations presented in the ES was lower than that suggested by Cranfield University, so the impact of this will be assessed within the sensitivity tests to be undertaken for Deadline 4.

A.1.3 Expected impact of the sensitivity modelling

A.1.3.1 The sensitivity testing will comprise the following updates:

A. Further sensitivity testing to explore the impact of a number of alternative design scenarios.

B. Removal of the maintenance and transportation emissions from the operational GHG intensity figure to achieve a more like-for-like comparison with the projected gird average (as explained above).

C. Increasing the replacement rate for the BESS in line with the assumption used for the modelling presented in the Cranfield University report.

A.1.3.2 The impact of the sensitivity testing is expected to be twofold: an impact on the operational GHG intensity of the Scheme and therefore the comparison to the grid average emissions, and an impact on the whole-life GHG intensity of the Scheme and therefore the comparison against alternative forms of energy generation.

Operational GHG intensity

A.1.3.3 The sensitivity testing to be undertaken will remove maintenance and transportation emissions from the operational GHG intensity of the Scheme to achieve more of a like-for-like comparison with the projected grid average. The modelling will demonstrate that the Scheme will have a carbon benefit contrary to Cranfield University's report and will therefore confirm the robustness of the ES.

Whole-life GHG intensity

A.1.3.4 Increasing the BESS replacement rate in line with the Cranfield University assumptions, and increasing the quantity of BESS for some of the alternative design scenarios, will increase the embodied carbon and maintenance emissions modelled, and therefore increase the whole-life GHG intensity of the Scheme.

A.1.3.5 However, as this will be driven by increases in GHG emissions associated with the BESS, it is important to consider the wider benefits of the BESS for the resilience and flexibility of the grid. For example, by storing renewable energy during periods of low demand but high solar generation, the BESS is able to release this renewable energy at periods of high demand but low generation. The alternative to this, during periods of low solar availability, would often be for fossil fuel alternatives such as gas-fired power stations to be utilised to fill these times of low generation. Therefore, the GHG benefit of this flexibility can be considerable when you consider fossil fuel energy generation as the counterfactual scenario.

A.1.3.6 National Grid, in the 2022 Future Energy Scenarios report[3], highlights the importance of increasing electricity storage capacity, modelling total storage capacity of approximately 32GW to 52GW (or total storage volume of approximately 120GWh to 190GWh) for the three scenarios that align to net zero by 2050. The report states:

A.1.3.7 "*Electricity storage capacity increases in all scenarios to ensure peak demand can be met reliably as an increasing proportion of our electricity is generated from weather dependent renewables. We need somewhere to store excess energy at times of high renewable generation, and somewhere to get energy from when demands are high and generation output is low.*

A.1.3.8 *So, the amount of storage in a scenario is proportional to its dependence on renewable generation and electrification of demand (mainly heat and transport). It is also dependent on the uptake of technology as well as market design and policy which help with flexibility, such as smart-tariffs, interconnector capacity, Vehicle-to-Grid (V2G) and locational pricing (which can incentivise efficient siting of storage). Based on our analysis and stakeholder engagement for FES 2022, we are significantly increasing the amount of storage we expect to see by 2050 and how early it is deployed in all scenarios. We see especially rapid growth early on in [the Leading the Way scenario] as rapid deployment of renewables and closure of gas generation means that storage needs to be available sooner and in larger capacities.*"

A.1.3.9 The BESS storage is therefore considered to be in line with current and future policy, and has a crucial part to play in the effective decarbonisation of the UK grid in line with Government targets.

A.1.4 1% assessment threshold

A.1.4.1 The Cranfield University report objects to the threshold of 1% of the UK's carbon budgets used to help determine the significance of GHG emissions associated with the Scheme in the ES.

A.1.4.2 At the time of writing the ES, there was no industry standard guidance on how to assess the significance of GHG emissions. The IEMA guidance suggested the relevant carbon budgets could be used, but left it to professional judgement of the practitioner to determine how best to assess significance. As outlined in the ES, the 1% threshold was determined based on the following PAS 2050 definition of a "material contribution", concluding that emissions of less than 1% of the carbon budget could be considered not material, and would therefore not materially affect the UK's ability to meet its carbon targets.

[3] Ibid.

A.1.4.3 "***Material contribution**: contribution of any one source of GHG emissions to a product of more than 1% of the anticipated life cycle GHG emissions associated with the product*"

A.1.4.4 This approach has been applied for the GHG Assessment of a wide range of EIA schemes across numerous sectors, including power, transport, aviation, and residential and commercial infrastructure.

A.1.4.5 However, since the publication of the ES, IEMA have updated their guidance on assessing GHG impacts in EIA[4]. This new guidance focuses much less on the magnitude of emissions, and more on alignment to relevant policy and a net zero trajectory. The guidance is clear that "A *project that causes GHG emissions to be avoided or removed from the atmosphere has a beneficial effect that is significant. Only projects that actively reverse (rather than only reduce) the risk of severe climate change can be judged as having a beneficial effect.*"

A.1.4.6 The guidance also states "*[the significant beneficial category] is reserved for projects with effects that directly or indirectly remove or avoid GHG emissions in the without-project baseline*" and that "*Where the fundamental reason for a proposed project is to combat climate change (e.g. a wind farm or carbon capture and storage project) and this beneficial effect drives the project need, then it is likely to be significant*".

A.1.4.7 As outlined above, the Scheme is considered to result in fewer emissions than the without-project baseline, and is considered to play a crucial role in the decarbonisation of the grid in line with UK Government targets. Therefore, if the latest IEMA guidance were to be applied to the Scheme, the conclusion would remain beneficial, and there would therefore be no impact on the outcome of the assessment presented in the ES.

A.1.5 Summary

A.1.5.1 In summary, sensitivity testing is being undertaken following some of the points raised in the Cranfield University report, and also to test the impact of various alternative design scenarios. The impact of the Scheme is expected to remain beneficial.

A.1.5.2 However, it should be noted that all modelling undertaken (as presented in the ES and the Cranfield University report) is very conservative for the reasons outlined in Section 1 of this response, and therefore likely underestimates the beneficial impact of the Scheme.

A.1.5.3 The Scheme is also in line with National Grid FES modelling, which models considerable uptake of solar power and battery storage in all scenarios that align with the 2050 net zero target. Therefore, the Scheme is considered to have a crucial role to play in not only the decarbonisation of the grid and the ability of the UK to meets its net zero commitments, but also in increasing the resilience and flexibility of the grid.

A.1.5.4 This response has also looked at the impact of the updated IEMA guidance on the assessment criteria for the significance of GHG emissions, determining that the Scheme would still be considered to have a significant beneficial impact on the climate. This is in line with the outcome of the assessment presented in the ES.

[4] IEMA (2022). *Assessing Greenhouse Gas Emissions and Evaluating their Significance – 2nd Edition.* Available at: [redacted] [Accessed 25/11/2022].