



*ID Number: 20031311*

**Sunnica Energy Farm – Ref. EN010106**

**Issue Specific Hearing 4 (16 & 17 February 2023) –  
(ISH4) on:**

**Landscape,  
Historic environment,  
Visual and in-combination impact,  
Draft Development Consent Order, and  
Traffic and transport.**

**West Suffolk Council Registration ID Number: 20031311**

**Deadline 7**

**3 March 2023**

### Issue Specific Hearing 4 (16 & 17 February 2023)

#### Post hearing submissions including written summary of West Suffolk Council's Oral Case

Topic	West Suffolk Council's Response	References
<b>Agenda Item 1 – Welcome, introductions and arrangements for the Issue Specific Hearing</b>		
	Ruchi Parekh appearing on behalf of West Suffolk Council accompanied by Jaki Fisher (Senior Landscape and Ecology Officer), Clare Oliver (Planning Officer), Clare Riches (Lawyer), and David Beighton (Principal Planning Officer).	
<b>Agenda Item 2 – Landscape and visual impact</b>		
	<ul style="list-style-type: none"> <li><b>Update from the Applicant on specific impacts on visual amenity around parcels E19, E20, E21 and E22 (south of Elms Road) and potential for mitigation</b></li> </ul> <p>WSC endorses the comments made by SCC including in terms of the extra mitigation that is required and achievable.</p> <ul style="list-style-type: none"> <li><b>General impacts on the landscape of the area; potential for mitigation and impact of mitigation proposals on the landscape</b></li> </ul> <p><u>General impacts</u> WSC's concerns in relation to the general impacts on the landscape of the area are documented in the LIR as follows:</p> <p>The large geographical scale of the proposals affecting significant area of farmland. The proposals will create a new landscape and place. LIR 10.7, 10.10, 10.13, 10.15.</p>	[REP1-024]

	<p>The open landscape character will fundamentally change from farmland to solar farm landscape – solar arrays and other infrastructure contained/enclosed by planting to varying degrees (LIR 10.161)</p> <p>There is general agreement across the parties that the landscape character of the DCO site would be significantly affected including at year 15 and that there would also be significant effects to a number of landscape types and areas. The Councils maintain that the proposals will lead to widescale transformation of the rural landscape.</p> <p>WSC does not agree with the applicant's assessment that impacts will not be significant by year 15 (LIR 10.156, 10.160, and 10.179, 10.180). The reasons are that:</p> <ul style="list-style-type: none"> <li>o mitigation proposals are not sufficient/robust to come to this conclusion</li> <li>o there will be an accumulation of minor affects</li> <li>o the perception of a large solar farm across this wide area will remain</li> </ul> <p><u>Potential for mitigation</u></p> <p>The Councils' concern is at LIR 10.9 in 10.189. WSC's view in relation to the potential for mitigation was set out in ISH2 post hearing notes item 4d. Some parts of the landscape are more able to accommodate the proposals than others. Where the landscape is very open, it is more difficult to assimilate the proposed development. Within Sunnica East, these areas include:</p> <ul style="list-style-type: none"> <li>o E05 not in WS</li> <li>o E01—E04, E33 and E08-E10</li> <li>o Area to the north of the U6006 EC03, E12 and E13</li> </ul> <p>Areas where there is an existing GI framework are more able to accommodate the proposals although there would be a consequent impact on legibility of features in the landscape where they are present, for example the pine lines and the Lee Brook. Other impacts of the proposed mitigation (LIR 10.189-10.197) include:</p> <ul style="list-style-type: none"> <li>o a significant increase in woodland in locations where it is otherwise absent</li> <li>o proposals are not tailored to the complex landscape including the changes to the landscape character</li> </ul>	<p>[APP-042] [REP-019]</p> <p>[REP1-024] [REP4-131]</p>
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	<ul style="list-style-type: none"> <li>○ truncation of views is inevitable where planting is used to screen development</li> <li>○ loss of landscape features including TPO trees</li> </ul> <p>WSC endorses the points made by SCC in relation to the potential for further mitigation, while respecting the delicate balance between the conflicts of planting in an inherently open landscape.</p> <p>WSC recognises that there is a careful balance to be struck between mitigation and further impacts on the landscape. However, this must be judged on a parcel-by-parcel basis, given the differences in landscape character and features across the scheme. The key points are as follows:</p> <ul style="list-style-type: none"> <li>• The Councils have taken a position from the outset that some parcels are not capable of mitigation taking into account of the requirements of landscape, ecology, recreation and archaeology. In West Suffolk, this includes E12 and E13.</li> <li>• For other parcels the Councils have judged that, if the scheme is to go ahead, more mitigation must be provided to screen elements of the scheme even though the mitigation landscaping itself might be harmful or uncharacteristic within the particular landscape.</li> </ul> <p>As for the latter point, WSC is particularly concerned with the locations of the BESS within Sunnica East A and Sunnica East B. In both these locations the development will be visually prominent. Assimilation into the landscape will not be achieved with the level of mitigation currently proposed. At E33 this is hampered not only by the openness of the landscape but also by the archaeological constraints. WSC's view is that more needs to be done, for example, by providing more woodland in the landscape. This strategy for landscape improvement is recommended in the Cambridgeshire Landscape Guidelines.</p> <p>At E18, whilst there have been some improvements to screening of the BESS from Elms Road, the west and north of the landscape framework is made up of tree belts along with pine lines which will not form an effective screen. The pine lines will</p>	
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	<p>become illegible in the landscape if the scheme is to go ahead. The Councils' view is that these should be buffered and restored as part of the scheme rather than eroded as implied by the AIA, which recommends the removal of standing deadwood and some trees where land frequency increases. In this location the Councils have identified that the existing landscape framework should be strengthened to provide an effective screen to the BESS from the wider landscape and from the U6006.</p> <p>The Councils have made clear their position on the appropriate level of mitigation throughout the examination process, including on a 'parcel by parcel' basis in the joint 'Deadline 4 Submission - Review of Outline Landscape and Ecology Management Plan' pages 10-17'.</p> <p>An update of the current position in relation to mitigation on a 'parcel by parcel' basis will be submitted at DL7 in response to the ISH4 Action point 1. WSC fully endorses the position set out in this document.</p> <p>Finally, WSC does not consider that NPS EN-1 sets a test of exceptionality in relation to landscape harm, as suggested by the applicant at ISH4. The policy position, properly construed, is as set out by SCC at DL6 [REP6-076].</p>	[REP4-149]
<b>Agenda Item 3 – Historic Environment</b>		
	<ul style="list-style-type: none"> <li>• The Avenue (Chippenham Park Registered Park &amp; Garden) WSC has no specific comment to make on this matter</li> <li>• Plane crash site, parcel E05 WSC has no specific comments to make on this matter</li> </ul>	
<b>Agenda Item 4 – In-combination impacts</b>		
	<p>The ecology and biodiversity, historic environment, and landscape and visual impact on:</p> <ul style="list-style-type: none"> <li>• Land parcels W01, W02 and EC04 WSC has no specific comment to make on this matter</li> </ul>	

	<ul style="list-style-type: none"> <li>Land parcels W03, W04, W05. W06, W07, W08, W09, W10, W11, W12, W17 and ECO5</li> </ul> <p>WSC has no specific comment to make on this matter</p> <p><b>Land parcel E05</b></p> <p>WSC's interest in parcel E05 stems from its use by Stone Curlew (SC) and the potential for this land to provide recreational disturbance mitigation which would benefit the SC offsetting land at ECO1 and ECO2</p> <p>In relation to the use of E05 by Stone Curlew, the Council's view remains unchanged. In essence:</p> <ul style="list-style-type: none"> <li>-The Council has not had access to any historic Stone Curlew records.</li> <li>-The SC survey data collected by the applicant shows that Stone Curlew used this field one year out of the three years when surveys took place.</li> <li>-It is not clear whether this represents regular nesting taking into account crop rotations, or whether this was a one-off situation.</li> </ul> <p>The option put forward by SCC in response to EXQ2.0.9 to remove solar panels from the northern part of E05 might allow continued use of this land by SC but would be tempered by the public access management proposals.</p> <p>The public access management proposals in the Environmental Masterplan Sheet 2 are likely to be beneficial in diverting recreational use of ECO1 and ECO2 by the residents of Isleham and Freckenham.</p> <p><b>Land parcels E12 and E13</b></p> <p>WSC's concerns in respect of these parcels have not been addressed (LIR at 8.6 bullet 2, 8.57, 10.175, 10.203, 10.204, 10.205).</p> <p><u>E12</u></p> <p>The Councils strongly consider that E12 should be omitted from the scheme (LIR 8.6 bullet 2, 8.57, 10.175, 10.203, 10.204, 10.205)</p> <ul style="list-style-type: none"> <li>-The option put forward by SCC in response to EXQ2.0.9 to remove solar panels from this parcel focuses on reduction of landscape impacts (LIR 204-5). The so-called 'halfway-house' proposal seeks to achieve a reduction of the landscape impacts on</li> </ul>	<p>LIR 8.6 [REP1-024], [REP4-131] p4 item2b</p> <p>[REP5-084]</p> <p>[REP5-061]</p> <p>[REP5-084]</p>
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	<p>users of the U6006 road without increasing the impact on ecology; however, unacceptable residual effects on protected trees which form part of a pine line remain as would impacts on SC. Other unacceptable impacts would also remain (as set out below).</p> <p>If solar panels were to be completely removed from Parcel E12, there would be no need for a vehicular access between E13 and E12, and the cable could be directionally drilled avoiding the need to remove protected trees from pine line G81</p> <p>The Councils consider that E12 should be removed to avoid impacts on SC:</p> <ul style="list-style-type: none"><li>-SC have been shown to regularly nest across E12 and ECO3 with 2-3 pairs using this area over the three years when surveys by the applicant took place.</li><li>-The proposed panels in E12 would concentrate SC to the north of this regularly used nesting area (into ECO3) close to the road and to the settlement of Worlington. SC are known to avoid these disturbance features.</li><li>-The applicant makes the case that the proposed offsetting utilises 'the species' current and historical distribution across the Order limits replicating the conditions that the birds are already utilising, irrespective of whether these meet the Natural England offsetting criteria. However, this does not represent usual behaviour for SC and there is no guarantee that this tolerance will continue in the population should these particular birds not return in the spring.</li><li>-Panels in E12 would reduce the size of this regular breeding site significantly; 27ha is unlikely to support 3 pairs of SC. In addition, the presence of the panels on E12 would likely have an impact on the use of the retained offsetting land at ECO3.</li><li>-Other introduced factors might additionally affect the efficacy of the offsetting land at ECO3 such as the introduction of a permissive footpath route, the recreational attraction of open grassland, potential impact of strategic development at West Suffolk site allocation SA4 within 1.5km of ECO3, and habitat establishment and management of translocated turf from E13.</li><li>-SC offsetting at ECO1 and ECO2 will not provide grass heath which is the habitat used by SC in the Brecks. In addition, there is uncertainty around whether ECO1 can provide the 3 bare ground plot because of archaeological constraints, and there is little room to provide further plots in ECO2.</li></ul>	
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	<p>-Finally, the applicant has no contingency plan (beyond adaptive management which is likely to again be limited by archaeological constraints) in the event that the offsetting land does not meet its objective.</p> <p><u>E13</u></p> <p>The Councils' position is that E13 should preferably be omitted from the scheme (LIR 8.96, 8.97) and [REP4- 131] item 2b, and 2c.</p> <p>-The option put forward for E13 by SCC in response to EXQ2.0.9 [REP5-084] relies on the removal of solar panels from parcel E12. The Councils' position is that the U6006 route should not be constrained with solar panels on both sides and that along the length of the route long distance views should be retained on at least one side (LIR 204-205). The option put forward maintains views to the northeast where the existing vegetation is a pine line with intermittent scrub vegetation. If this option were to be implemented, the hedgerow to the north and east of 12 should be adapted to wrap around the remaining panels.</p> <p>In relation to the use of E13 by Stone Curlew, the Councils' previous concerns have not been addressed:</p> <ul style="list-style-type: none"> <li>-The Council has not had access to any historic Stone Curlew records.</li> <li>-The SC survey data collected by the applicant shows that Stone Curlew used this field one year out of the three years when surveys took place.</li> <li>-It is not clear whether this represents regular nesting taking into account crop rotations, or whether this was a one-off situation.</li> </ul> <p>The matter of the acid grassland was raised by the Council in its ISH2 Post Hearing Submission [REP4-131] item 2c p9.</p> <p>In relation to the loss of acid grassland from parcel E13 (T13, ES Appendix 8C [APP-079] p8C-36 section 5.1.2); this is assessed by the applicant to be of County importance and lowland dry acidic grassland priority habitat. This grassland supports Breckland invertebrates (E13, ES Appendix 8D [APP-080] p8D-21 section 5.1.4-5.1.6) assessed by the applicant to be of County – Regional value.</p> <ul style="list-style-type: none"> <li>-The Council's position remains that the mitigation hierarchy should be adhered.</li> <li>-The translocation of turfs to ECO3 and any aftercare during establishment, if undertaken within the bird breeding season would likely cause further disturbance to any SC present.</li> </ul>	
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	<p>-The applicant's current position is that this grassland will be translocated [AS-324] (p3 row4), however, this mitigation is not included in the OLEMP neither is it shown on the Environmental Masterplan and therefore is not secured.</p> <p><u>Removal of further parcels/panels</u></p> <p>Finally, WSC does not consider that any weight can rationally be attached to the applicant's suggestion that the removal (or reduction) of any further parcels from the scheme may render the scheme as a whole unviable. The applicant has not evidenced its case on viability, and therefore there is no basis on which the ExA could conclude that the removal (or reduction) of parcels will impact on scheme viability.</p> <p>WSC further supports the suggested amendments to the draft DCO proposed by SCC on the basis that further parcels should (and can) be excluded from the scheme.</p>	
<b>Agenda Item 5 – Traffic and transport</b>		
	<ul style="list-style-type: none"> <li>• Ports, AIL and crane routes: impacts and consents WSC has no comments to make on this matter</li> <li>• HGV routes and forecast impacts WSC has no comments to make on this matter</li> <li>• Site accesses Until the matter of site accesses is concluded, WSC remains concerned that the AIA and the hedgerow plan do not represent the worst-case scenario for tree and hedgerow losses. It would be inevitable that further losses would be required if the option to manage site accesses was rejected by the highway authority.</li> <li>• Traffic management and regulation WSC has no comment to make on this matter.</li> <li>• Protective provisions and side agreements See below</li> </ul>	

	<ul style="list-style-type: none"> <li>• Outstanding matters WSC has no outstanding matters to raise.</li> </ul>	
<b>Agenda Item 6 – Draft Development Consent Order and related matters</b>		
	<ul style="list-style-type: none"> <li>• <u>Compensation package(s), s106 agreement(s) and side agreement(s)</u> <ul style="list-style-type: none"> <li>o <u>Progress</u></li> </ul> <p>Discussions over the section 106 agreement are ongoing between the relevant parties.</p> <p>As for the applicant's comments at ISH4 that the district authorities will benefit from additional business rates, WSC maintains that this is an entirely distinct matter which is wholly irrelevant to the issues in this examination as well as the overall planning balance. The rates regime is designed to meet different objectives, primarily to ensure that those who occupy non-domestic properties contribute towards the funding of local services. Business rates are not levied to address planning harms, nor are they designed to assist local communities who are subject to the knock-on adverse impacts of large-scale infrastructure schemes of this nature. The level of rates levied under the local government finance legislation is therefore immaterial to the decision on this DCO.</p> <ul style="list-style-type: none"> <li>o <u>Relationship to DCO</u></li> </ul> </li> <li>• <u>Procedural aspects of any eventual removal of parcels</u> <ul style="list-style-type: none"> <li>o <u>E05, E12 and E13</u></li> <li>o <u>W03-W12</u></li> </ul> <p>WSC endorses the position set out by SCC, including the amendments proposed to the draft DCO.</p> </li> <li>• <u>Articles</u> <ul style="list-style-type: none"> <li>o <u>General - temporary use of land</u></li> <li>o <u>Article 2, permitted preliminary works</u></li> </ul> </li> </ul>	

	<p>o <u>Article 5, power to “maintain” authorised development, replacement of Work(s)</u> WSC wishes to see the adoption of the notification proposals it requested in [REP6080], as to future maintenance works. WSC understands that this proposal is accepted by the applicant.</p> <p>o <u>Article 10, construction /maintenance of altered street</u> o <u>Articles 9 and 11, consent for street works</u> o <u>Articles 9 and 11, PRow closures, (inc Schedule 6, Part 2)</u> o <u>Article 18(1), post-decommissioning environment</u></p> <p>WSC endorses the position set out by SCC in its post-hearing submissions for ISH4</p> <p>o <u>Article 27, removal of vegetation</u></p> <p>WSC endorses the position of ECDC in relation to the exclusion of “vegetation” in article 27. Should vegetation be retained within the scope of article 27, then additional wording should be included (similar to that included in article 36(2)(d)) to ensure compliance with species protection legislation. The proposal is for an additional caveat for sub paragraph 27(1)(b) which should require the undertaker to:</p> <p><i>“take steps to avoid a breach of the provisions of the Wildlife and Countryside Act 1981(a) and the Conservation of Habitats and Species Regulations 2017(b) or any successor acts and regulations.”</i></p> <p>The reason for this is because article 27(1)(b) does appear to confer a distinct power to remove any vegetation from land. Article 27 is not simply concerned with temporary possession.</p> <p>o <u>Articles 36 and 37, trees and trees subject to TPO</u></p>	
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	<p>WSC endorses the concerns set out by ECDC. Further, in relation to Article 37 TPO trees, it considers that it may be appropriate to disapply the TPO legislation during construction (as the removal of any trees at this stage will have been scrutinised during the design stage of the application). However, it is not appropriate for this broad power to continue to apply to the operational and decommissioning phases of the scheme.</p> <p>WSC highlighted the distinction between the construction period and the operational period in 'West Suffolk Comments on Applicant's Deadline 5 Submissions' [REP6-080] page 9 first row.</p> <p>Our proposal is that the wording in Article 37 (1) is amended to include the 'construction of the authorised development' only.</p> <p><u>o Article 44, traffic regulation measures</u> WSC no specific comment</p> <ul style="list-style-type: none"> <li>• <u>Schedule 2, Requirements</u> <ul style="list-style-type: none"> <li>o <u>R6, detailed design approval, inc. avoidance of landscape impact of structures</u></li> </ul> </li> </ul> <p>The embedded design mitigation listed in the Landscape and Visual Amenity chapter of the ES [APP-042] 10.7.4a &amp; b states, in relation to the BESS and substation, that 'the tonal rendering of shades which are suitable to integrate within the landscape will help reduce the perceived overall mass of these structures'.</p> <p>The Councils LIR 10.171 recommended that to 'ensure that the tonal rendering of the structures is appropriate an Environmental Colour Assessment should be undertaken prior to or as part of the detailed design and presented with the details of construction materials to show how the colour of the structures has been selected to integrate with the landscape'.</p> <p>WSC's view is that if this were secured in the Design Principles document the wording in the DCO would be sufficient. The current wording in the Design Principles Document, that the external finish for the BESS is specified as 'to be in keeping</p>	
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	<p>with the prevailing surrounding environment, most likely with a green, light grey or white painted finish', would not in WSC's view meet the commitment in the ES. A commitment to inform the colour of the external finishes of structures through Environmental Colour Assessment should be included in Table 1 p5, p6, Table 2 p10, p14, Table 8 p20. The wording should be amended as follows:</p> <p>'Externally finished to be in keeping with the prevailing landscape determined through an Environmental Colour Assessment'</p> <p><u>o R10, contingency fund</u></p> <p>WSC considers that the applicant should have a credible contingency plan in place to allow for the situation where the objectives of the offsetting land ECO1, ECO2 and ECO3 for SC are not met. The Councils remain concerned that the conflicts between the preservation of archaeology within ECO1, ECO2 and ECO3 and the delivery and maintenance of Stone Curlew offsetting have not been reconciled and it is currently not certain that the ten 2ha disturbed ground plots can be delivered.</p> <p>This, along with other uncertainties in relation to the SC offsetting land, highlights the importance of the applicant putting a contingency plan in place, which goes beyond reliance on 'adaptive management' for the situation that the Stone Curlew mitigation strategy is not effective.</p> <p>WSC's experience from other development is that securing suitable SC mitigation land (outside of the DCO land) is likely be challenging because of the need to meet the specific criteria of soil type and absence of disturbance factors. Providing a contingency fund should therefore be a measure of last resort and in the Council's view it would not remove the uncertainty around the efficacy of the SC mitigation package.</p> <p>WSC's view is that the most appropriate place for a contingency plan is in the 'Offsetting Habitat Provision for Stone Curlew Specification' because this is the document secured by Requirement 10 of the DCO to deliver the Stone Curlew offsetting provision.</p>	<p>[REP6-037]</p>
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	<p>The requirement for the applicant to develop and implement a contingency plan would follow naturally on from section 4.1.40 [REP5-047] which allows for any review of annual monitoring reports to identify remedial actions to be agreed and implemented as a commitment of the scheme.</p> <p>However, the section is not precise about the scope of remedial actions, which WSC suggests should include the identification of additional offsetting land should it be required. Potential options might include:</p> <ul style="list-style-type: none"><li>-Provision of additional habitat for Stone Curlew to address the concerns regarding the quality of the SC habitat and other disturbance factors – this could be achieved by removal of E12 from the scheme and creation of grass heath on this parcel.</li><li>-Removal of E12 from the scheme and allowing arable use to continue so that the parcel is available should it be required. This would have the additional benefit of making the existing area used regularly by SC available to them (subject to crop rotation) and removing the operational presence of the panels on E12 impacting on SC in ECO3.</li><li>-Securing an option to remove the panels from E12 in the future if it is found on review that the offsetting land does not support the required number of SC.</li><li>-Identify and secure of a land parcel in the vicinity of the DCO site (that fits the NE guidance criteria) that could be in reserve.</li></ul> <p>Section 4.1.40 should also be amended to make it clear when remedial actions might first be implemented, for example would they be available following the first annual monitoring report, and whether annual monitoring reports would also be provided during construction so that remedial actions (such as adaptive management) can be implemented from an early stage.</p> <p>The Council's view is that additional text should be added as follows:</p> <p>'Remedial actions' will include the provision of additional or replacement Stone Curlew habitat in the case where Stone Curlews use of the off-setting land does not meet the objective set out in 4.1.36 within the initial five year monitoring period set out in section 4.1.37 despite the implementation of any other agreed remedial</p>	
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	<p>actions. The location and management of the additional or replacement Stone Curlew offsetting habitat will be agreed with the EAG.</p> <p>o R23, Schedule 10, crash site exclusion area WSC has no comments.</p> <ul style="list-style-type: none"><li>• Other Schedules<ul style="list-style-type: none"><li>o Schedule 12, protective provisions – general WSC has no comments.</li><li>o Schedule 12, Part 8, drainage authorities: time limits, indemnities WSC no specific comments</li><li>o Schedule 13, discharge of Requirements WSC has no comments.</li><li>o Fees schedule</li></ul></li></ul> <p>The principle of the DCO incorporating a mechanism to address the fees payable to the local planning authority for discharging requirements is accepted in the PINS advice note 15: Drafting Development Consent Orders. The applicant has also accepted this principle.</p> <p>WSC proposed a fee schedule at deadline 5 [REP5-101]) based on the Fees Regs. The Council continue to believe that the Fees Regs provide the appropriate framework for establishing the relevant fee and suggest that the fee should be calculated using the category for the erection/alteration/replacement of plant and machinery. This is the fee category which has been used by both local planning authorities when dealing with TCPA applications for solar farms. WSC believe that an area-based calculation is an appropriate one given the scale and complexity of the work involved and the officer time that will be required.</p>	
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	<p>The fact that the Sizewell DCO relies on the Fees Regs demonstrates that they are sufficiently flexible to be applied to a wide variety of developments and we see no reason why they would not be the appropriate framework in this case.</p> <p>Using the Fees Regs as set out above, the maximum fee for a solar farm of this size in one district would be £300,000. In this case, the burden falls on two districts, which would normally mean that one authority gets 150% of that figure (£450,000). However, the two authorities are content to settle on the maximum fee of £150,000 each and believe this would be proportionate to the level of work that will be involved.</p> <p>The importance of securing an appropriate fee to enable WSC to properly resource the determination of the requirements must not be under stated. The suggestion that the requirements will somehow be straightforward because there is a repetition of the same type of development fails to take account of the varying contexts of the different parcels and the complex interrelationships between the different issues, many of which have not been fully bottomed out due to a lack of detail at this stage.</p> <p>We are mindful that a large amount of detail has been pushed to the requirement stage and we anticipate that dealing with the requirements in a timely manner is going to result in a significant strain on resources for the local authorities. In this regard we believe the fees proposed are an appropriate reflection of the officer time and financial burden that is likely to be involved.</p> <p>WSC has a single Ecology and landscape Officer covering the whole district and the consideration of the requirements will be a significant strain on this resource. WSC will have to send work out to consultants which WSC would have to finance. The fees for the requirement need to cover this the additional cost.</p> <p>Ultimately, it must be recognised that the discharge of requirements will have significant implications, including on the environment as well as the everyday lives of local residents. It is therefore imperative that the authorities are adequately</p>	
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	resourced so as to determine these applications in a comprehensive and timely manner.	
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