SUNNICA ENERGY FARM

EN010106

Volume 8

8.112 The Applicant's position on 'parcel by parcel' mitigation and residual effects

Planning Act 2008

Infrastructure Planning (Examination Procedure) Rules 2010

13 March 2023
Revision 00

Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010

8.112 The Applicant's position on 'parcel by parcel' mitigation and residual effects

Planning Inspectorate Scheme Reference	EN010106
Application Document Reference	EN010106/APP/8.112
Author	Sunnica Energy Farm Project Team

Version	Date	Status of Version
Rev 00	13 March 2023	Deadline 8 Submission

Table of contents

1 Introduction

1.1.1 The Applicant accepts that there is disagreement with the Councils on some aspects of the proposed mitigation for the Scheme. As outlined in the OLEMP **[REP7-015]** submitted at Deadline 7, the Applicant has designed the Scheme to respond positively to the local landscape character and mitigate impacts on people's views and visual amenity, while balancing the ecological and heritage constraints with the Scheme's context.

1.1.2 The Applicant has worked with the Councils to agree the mitigation to reduce the effects of the Scheme to an acceptable level and this is documented in the Section 2 to 4 below. The Applicant's response to the 'Joint Councils' position on 'parcel by parcel' mitigation and residual effects' document **[REP7-072]** is provided in the final column of each table.

1.1.3 Where the Applicant has not been able to accommodate the Council's proposed changes, the further mitigation measures and offsets recommended by the Councils would require the removal of large portions of the developable area. As outlined in its previous submissions, the loss of the generation capacity from the Scheme that is proposed by the Councils could in no way be reasonably characterised only as a small reduction in function.

1.1.4 The Applicant also maintains its position that the removal of the parcels proposed by the Councils would not result in a significant landscape or visual benefit. No part of W03-W12, E12, E13 or E05 falls within a landscape with statutory status, such as an AONB. This was a key factor in the original site selection process. Neither does the landscape across the Scheme have a local landscape designation or is otherwise identified in local plan policy or evidence for its landscape value, which nevertheless in the context of NPS EN-1 paragraph 5.9.14 should not be used in themselves to refuse consent.

1.1.5 In terms of ecology, the key species in the area of E05, E12 and E13 are Stone Curlew. Stone Curlew are known to move around the area both within the Scheme and surrounding areas depending on availability of suitable crop rotation. E05, E12 and E13 have had crops/livestock in previously that has made the land parcels unsuitable for Stone Curlew, such as pigs, and therefore the fields on their own do not hold exceptional ecology or biodiversity value. The Stone Curlew offset areas provided in ECO1, ECO2 and ECO3 would provide high quality nesting and foraging habitat for the duration of the Scheme. Once established these areas would provide a more valuable biodiversity habitat than the current situation with farmers rotating crops on a regular basis, which will secure the local Stone Curlew population. The ECO areas will be monitored by the EAG as per the commitments in the OLEMP **[REP7-015]**. With regards to Chippenham Park and Garden and Avenue, the Applicant acknowledges that there will be an adverse impact on this asset; however, the impact is less than substantial harm as agreed by Historic England, Say No to Sunnica and the Applicant and the Scheme is temporary with the impacts being reversable after the 40 year period.

2 Sunnica East Site A

Ref.	Current proposals as detailed in OLEMP [REP5-014]	Residual effects	Further mitigation required [REP4-149] and LIR [REP1-024]	Applicants mitigation under discussion/or not yet shown on EnvM –[AS-324] and/or [AS-321]	Residual effects if the Council's mitigation is implemented in full	Applicant's response at Deadline 8
E05	- -The solar panels have been sited slightly back from Beck Road via a landscape buffer of native grassland, to reduce the proximity of the panels to road users, retain views along the road corridor of the churches in Isleham and Freckenham and to retain a perception of travelling through the landscape that separates the settlements. -Proposed broadleaved woodland planting, mixed scrub and rush pasture around the edges of the parcel assist with landscape integration and screening of views. -The proposed permissive route in E05 surrounds the outskirts of the solar panels,	-Planting of woodland is uncharacteristic in this open landscape -Views from Isleham including the Ark will be of vast expanse of solar panels initially -In the long-term long distant open views from Isleham and the Ark will be truncated by the woodland planting including to Freckenham Church(VP3)	-E05 should be removed from the scheme either entirely or be reduced to an existing field boundary, outside the plane crash site. If this is not possible: -Approach to planting should be scattered trees in front of hedgerow (refer to App 10E, p.13, ''empty' perception to the character) (see VP5) -Hedgerow with occasional hedgerow trees should be considered along Beck Road/ E05 boundary (south-west) to retain views towards Lee Brook (see VP6, VP7) -Omit dense tree planting between Beck Road and south-eastern tip of E05 to retain	-Applicant to review positioning of the rush pasture, trees and shrubs between ECO1 and southern corner of E05, taking into consideration archaeology in the area including the old river line	-Full removal of E05 would remove the effects of the scheme west of Lee Brook, both those resulting from the development itself and those resulting from mitigation planting inappropriate for the landscape in this area. -Residual effects are expected to include long-distance, filtered views of E01, E03 and E33 from VP1-VP5. Together with the further mitigation proposed by the Councils for these parcels, these views would reduce over time, as the vegetation matures, and what would remain would be views towards Lee Brook, identifiable in the landscape. Partial removal of E05	Further detail has been added to the OLEMP [**REP7-015**] regarding the management of people in relation to the permissive path and ECO1 and ECO2. The proposed habitats within the grassland south of E05 will be determined at the detailed design stage, taking into consideration archaeology in the area including the old river line, within the principles and parameters established within the DCO. Further detail has been provided in the OLEMP and on the Environmental Masterplans [**REP7-054**] regarding the memorial to the B50 plane crash, including a memorial, raised

Ref.	Current proposals as detailed in OLEMP [REP5-014]	Residual effects	Further mitigation required [REP4-149] and LIR [REP1-024]	Applicants mitigation under discussion/or not yet shown on EnvM –[AS-324] and/or [AS-321]	Residual effects if the Council's mitigation is implemented in full	Applicant's response at Deadline 8
	-Additional habitats along western grassland edge (between permissive path and Beck Road) will deter people close to stone-curlew plots		views along Beck Road (either direction). (see VP11) -River restoration scheme. -Where proposed woodland is slim-line (along northern boundary of E05), a hedge may be preferable to retain views to Freckenham Church, taller structures within E05 permitting. (see VP3) -Additionally for the event that the ExA is minded to recommend the retention of E05 in its entirety, the Councils have requested that the Applicant should demonstrate positive place making in this area and have provided suggestion and ideas, which are thus far not reflected on the Environmental		-Partial removal of E05 (to an existing field boundary) would significantly reduce the adverse effects on views of the scheme from Isleham and the Ark and long-term truncation of views would be significantly reduced. -E05 Retained -Planting of woodland is uncharacteristic in this open landscape -Views from Isleham including the Ark will be of vast expanse of solar panels initially -In the long-term long distant open views from Isleham and the Ark will be truncated by the woodland planting. - Positive place making around the place crash site and a circular route for footpath users would result in some recreational benefits.	viewing area, seating and interpretation boards. There is currently no access to the plane crash site and the Scheme will not change this. The spur of the permissive path was erroneously excluded at D5 and has been added back to the Environmental Masterplan published at D7. The self-binding gravel path is now shown on the Environmental Masterplan and the 2m offset from planting has been added to the OLEMP. The width of the offset from Beck Road has not been changed from that shown on the parameter plans submitted with the DCO application.

Ref.	Current proposals as detailed in OLEMP [REP5-014]	Residual effects	Further mitigation required [REP4-149] and LIR [REP1-024]	Applicants mitigation under discussion/or not yet shown on EnvM –[AS-324] and/or [AS-321]	Residual effects if the Council's mitigation is implemented in full	Applicant's response at Deadline 8
			Masterplans. The suggestions include: - Provide an additional footpath spur to Beck Road (under review) -To raise the viewing area and/or locate it so there is sight of the plane crash site (along the line of the panels or by removing a line of panels) -To provide interpretation and signage to explain the history of the Plane Crash site -To remove some solar panels along the assumed flight path, which would create a visual link from Beck Road/the permissive footpaths across the Plane Crash site towards Mildenhall where the plane took off -Allow access to the Plane Crash site area -Provide seating			

Ref.	Current proposals as detailed in OLEMP [REP5-014]	Residual effects	Further mitigation required [REP4-149] and LIR [REP1-024]	Applicants mitigation under discussion/or not yet shown on EnvM –[AS-324] and/or [AS-321]	Residual effects if the Council's mitigation is implemented in full	Applicant's response at Deadline 8
			-Work with the community of Isleham to commission a commemorative sculpture			
ECO1	– The proposals are for an area of native chalk grassland implemented via non-invasive methods, as a positive response to the below ground archaeology.	-Informal footpath to the north along the dismantled railway line will cause disturbance to Stone Curlew	-Consider landscape hedge along western half of the northern boundary (currently no planting) to reduce disturbance of offsetting land by recreational users on the dismantled railway line.	-Applicant to review proposals for this area, to resolve in-combination effects between archaeology and ecology.	-Disturbance to Stone Curlew will remain in the short term, but as the hedge matures disturbance would be reduced over time, increasing the chances of successful Stone Curlew nesting.	An additional hedgerow has been added along the northern boundary of ECO1 to enhance habitat connectivity and visual screening [**REP7-054**]. The observed use of these fields by Stone-curlew occurs against existing baseline levels of disturbance, however, the additional screening provided by new hedgerows in certain locations will further reduce potential disturbance as hedgerows mature.
ECO2	– Native chalk grassland and stone curlew plots, will retain the open character of the land between Isleham and	- Existing PRoW from Mortimers Lane within the eastern boundary of ECO2 will cause disturbance to Stone Curlew	-Provide a hedgerow between ECO2 and the existing PRoW to define the route and replicate Mortimers Lane. A barrier to the public will be created	-	-Disturbance to Stone Curlew will remain in the short term, but as the hedge matures disturbance would be reduced over time, increasing the chances	An additional hedgerow has been added between ECO2 and the Lee Brook to deter access from the

Ref.	Current proposals as detailed in OLEMP [REP5-014]	Residual effects	Further mitigation required [REP4-149] and LIR [REP1-024]	Applicants mitigation under discussion/or not yet shown on EnvM –[AS-324] and/or [AS-321]	Residual effects if the Council's mitigation is implemented in full	Applicant's response at Deadline 8
	Freckenham, to the west of Beck Road;		by the permanent predator fence		of successful Stone Curlew nesting.	existing bridleway as requested [**REP7-054**]. The observed use of these fields by Stone-curlew occurs against existing baseline levels of disturbance, however, the additional screening provided by new hedgerows in certain locations will further reduce potential disturbance as hedgerows mature.
E01	- Panels are offset from the Fen woodland to the north and by 8m from the Lee Brook to the west. -New willow trees planting along the Lee Brook edge of E01 to provide additional riparian planting;	Small number of willow trees provided would not achieve the level of screening of the panels and BESS and other solar infrastructure required from the west (views from Isleham/Beck Road, and River Lark It is not clear whether the rush pasture is retained or proposed	Additional planting is required on western boundary to screen views from West Row and the River Lark and to make Lee Brook more legible in the landscape (views from Isleham and Beck Road). Clarification is required on the width of the buffer /setback form Woodland north of E01 and E02 (it was understood to be 40m [see REP3-019,p.104],	Applicant has committed to -Review screening along the west of the parcel to provide better screening of E33 -Avoid any conflict with priority habitats where present	-Initial views of BESS from the River Lark but these would reduce as vegetation matures reducing the effects to an acceptable level. -Lee Brook would become more legible in the landscape, as the vegetation matures.	The offset from the Lee Brook is between 15m and 75m to retain its legibility in the landscape and to provide space for additional, dispersed riparian tree planting, which was added to the Environmental Masterplan at D7 [**REP7-054**]. The mitigation seeks a balance between visual screening and filtering of views and the open character of this

Ref.	Current proposals as detailed in OLEMP [REP5-014]	Residual effects	Further mitigation required [REP4-149] and LIR [REP1-024]	Applicants mitigation under discussion/or not yet shown on EnvM –[AS-324] and/or [AS-321]	Residual effects if the Council's mitigation is implemented in full	Applicant's response at Deadline 8
			not 8m, and should not be less than 30m)			section of the Lee Brook.
E02	– New broadleaved woodland planting along the eastern edge of the parcel, -EnvM also shows mixed scrub to the west and south along the ditch	-	-Clarification is required on the width of the buffer /setback form Woodland north of E01 and E02	-	-	The width of setbacks and propose planting is shown on the Environmental Masterplans [**REP7-054**].
E03	– New broadleaved woodland to the north and south of the parcel, to screen views from the wider landscape to the north and from Lee Farm.	-Legibility of Lee Brook in the landscape is lost -Views of BESS from the R Lark to the west (VP1) initially and in the long term	-Provide additional riparian planting including trees that would also provide screening/ softening of the scheme including the BESS and make Lee Brook more legible in the landscape (views from Isleham and Beck Road) -Increase the distance/ buffer between Lee Brook and western boundary of E03 to at least 30m to accommodate that planting.	-Review screening along E03 which would provide better screening of E33, ensuring any proposed planting does not conflict with the priority habitat (if any) along river.	-Initial views of BESS from the River Lark but would reduce as vegetation matures reducing the effects to an acceptable level. -Lee Brook would become more legible in the landscape, as the vegetation matures.	The offset from the Lee Brook is between 15m and 75m to retain its legibility in the landscape and to provide space for additional, dispersed riparian tree planting, which has been added to the Environmental Masterplan [**REP7-054**]. The mitigation seeks a balance between visual screening and filtering of views and the open character of this section of the Lee Brook.
E04	–Additional broadleaved woodland	-Potential for truncation of long- distance views	-Consider if, views from the residential	-	-	There are glimpsed views west from Ferry

Ref.	Current proposals as detailed in OLEMP [REP5-014]	Residual effects	Further mitigation required [REP4-149] and LIR [REP1-024]	Applicants mitigation under discussion/or not yet shown on EnvM –[AS-324] and/or [AS-321]	Residual effects if the Council's mitigation is implemented in full	Applicant's response at Deadline 8
	along the northern, southern and the eastern edges	of the Ark and St Andrews Church in Isleham.	properties on Ferry Lane to The Ark and St Andrew's Church in Isleham could be retained (see VP2C), with appropriate adaption of the proposed mitigation planting and siting of structures within E04.			Row through gaps in roadside vegetation. Linear belts of trees and shrubs are proposed along the eastern edge of Sunnica East Site A between 15m and 25m wide and will provide substantial screening of solar panel arrays. The substation and BESS will be screened from this location. The churches in Isleham are located on higher ground in the distant background relative to Ferry Road.
E33	-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.	-BESS and substation will remain visible in the landscape from the the edge of Isleham (VP3), River Lark (VP 01, 2A and 2B), Ferry Lane (VP2C) and the wider landscape to the south VP12A -Colour of external finishes for structures	- Plant a tree belt/woodland along the western side of E33 (Bess and substations). (see VP1, VP6, VP7) -Subject to archaeological constraints, there appear to be opportunities for a more	-	-The BESS and other solar infrastructure would remain visible and incongruent in the landscape initially including from the R Lark, Isleham, Ferry Lane and the wider landscape to the south, although the effects would be tempered by the tonal rendering of shades of structures.	The width of linear belts of trees and shrubs to the north (10m), east (15m) and south (15m) have been maximised within constraints to enclose and screen the substation and BESS [**REP7-054**].

Ref.	Current proposals as detailed in OLEMP [REP5-014]	Residual effects	Further mitigation required [REP4-149] and LIR [REP1-024]	Applicants mitigation under discussion/or not yet shown on EnvM –[AS-324] and/or [AS-321]	Residual effects if the Council's mitigation is implemented in full	Applicant's response at Deadline 8
	-The tonal rendering of shades to integrate the permanent structures within the landscape will help to reduce their perceived overall mass.	to be green, light grey or white	robust woodland planting scheme east of E33, which would help to screen the BESS even during winter conditions. (see VPs 2A and 2B) -Or adjust the position of the infrastructure here to allow sufficient space for effective mitigation (LIR 10.170) -Environmental colour Assessment to be undertaken at detailed design stage to inform the external finishes of the structures		-As the vegetation matures the effects would reduce particularly in the summertime although the planting would be uncharacteristic in the open flat landscape.	
E08, E09 and E10	Parcels E08, E09 and E10 are enclosed by new hedgerows, to screen views of the panels and reinforce existing hedgerow patterns. There is also a proposed area of chalk grassland within E09, above an archaeological mitigation area	-BESS and substation will remain visible in the landscape from VP12A, VP12B and wider landscape to the south.	-Photomontage suggests wider set back than Landscape Masterplan. (see VP12A) - Woodland north of E08 needs to be wider as views are far reaching towards BESS. -For E09 and E10 consider how the second hedge can be	- A second hedgerow is currently proposed along the southern edge of E09 and E10. Applicant to consider options for enhancing/increasing height of the existing hedgerow in this location	-Initially the BESS and substation will remain visible in the landscape from VP12A, VP12B and wider landscape to the south. -As the vegetation matures the effects would reduce particularly in the summertime although the planting would be	The woodland north of E08 has been reviewed and amended to more accurately reflect the arrangement of existing landscape features and expanded to 15m wide [**REP7-054**]. The proposed hedgerow north of Beck Road has been changed to a band of mixed shrubs, 10m

Ref.	Current proposals as detailed in OLEMP [REP5-014]	Residual effects	Further mitigation required [REP4-149] and LIR [REP1-024]	Applicants mitigation under discussion/or not yet shown on EnvM –[AS-324] and/or [AS-321]	Residual effects if the Council's mitigation is implemented in full	Applicant's response at Deadline 8
			adapted to strengthen and enhance the existing hedge on the southern boundary		uncharacteristic in the open flat landscape.	wide, adjacent to the existing hedgerow, to widen and reinforce its habitat and screening function.

3 Sunnica East Site B

Ref.	Current proposals as detailed in OLEMP [REP5-014]	Residual effects	Further mitigation required [REP4-149] and LIR [REP1-024]	Applicants mitigation under discussion/or not yet shown on EnvM –[AS-324] and/or [AS-321]	Residual effects if the Council's mitigation is implemented in full	Applicant's response at Deadline 8
ECO3	-ECO3 will establish a substantial offset from Freckenham Road, U6006 and County Wildlife Site will be retained and is proposed for native grassland -Retain existing hedges and pine line	-	-	-	-	No further updates are provided at Deadline 8.
E12	-New proposed hedgerow along northern and eastern edge of E12 to join existing hedgerow to act as screening for PRoW users [Environmental Masterplans (60589004_ES_LSP_8.1-3, Rev 1, Sheet 3 of 5, Sunnica East Site B)]; (Eastern hedgerow is not shown on the hedgerow plan.)	-Unacceptable visual impact from the U6006 Unacceptable loss of woodland TPO trees which form a pine line along the southern boundary of E12 with the U6006 (G81 on AIA) -Visual impact on open landscape when viewed from Worlington and from properties on Freckenham Road irreconcilable conflict between the requirements of landscape planting for	E12 should be omitted from the scheme. An alternative (halfway house was additionally proposed further to ExQ2 [REP5-084] If these options are not possible: -Provide an appropriate set back from U6006 and additional screen planting along the boundary of E12 parallel to the U6006 -Provide screen planting along the	-Consider adding planting within areas of existing vegetation (U6006) and adding a secondary hedge between E12 and E13 to provide additional screening.	**Removal of E12** -Loss of TPO trees could be minimised through directional drilling of cable as removal of trees to provide access across the U6006 would not be required. -There would be benefits for Stone Curlew **Partial removal of E12** (halfway house) -Visual effects from the U6006 reduced initially as a result of the set	The Applicant has reviewed the design and has incorporated a 30m set back either side of the vegetation which lines this section of U6006 to the security fence. There will be a further 5m offset from the fence before the closest panels, so 35m in total. This will create a wide area of native grassland either side of U6006, further reducing the potential for visual impacts in glimpses through gaps

Ref.	Current proposals as detailed in OLEMP [REP5-014]	Residual effects	Further mitigation required [REP4-149] and LIR [REP1-024]	Applicants mitigation under discussion/or not yet shown on EnvM –[AS-324] and/or [AS-321]	Residual effects if the Council's mitigation is implemented in full	Applicant's response at Deadline 8
		amenity (screening) and the requirements for ecology, to be realised in ECO3	southern and south-western boundary-hedge and pines. (see VP15A) -There should only be one crossing point across U6006, where vegetation loss is minimal -The existing hedgerow within E12, shown on the hedgerow plan should be retained		back to retain views. Although panels would be visible at a distance. -As the hedgerow around the panels matures the visual presence of the panels would be further reduced. Unacceptable loss of woodland TPO trees (G81 on AIA) to provide construction and operational access to E12 **E12 retained** -Initial visual effects from the U6006 reduced slightly as a result of the set although long distance views would largely be truncated, and the panels would remain visible. -As the vegetation matures the visual presence of the panels would be reduced.	in vegetation and reducing overall perception. The existing vegetation along U6006 in this location will be strengthened through natural regeneration and interplanting. This is noted on the Environmental Masterplan [**REP7-054**] and in the OLEMP [**REP7-015**] submitted at D7

Ref.	Current proposals as detailed in OLEMP [REP5-014]	Residual effects	Further mitigation required [REP4-149] and LIR [REP1-024]	Applicants mitigation under discussion/or not yet shown on EnvM –[AS-324] and/or [AS-321]	Residual effects if the Council's mitigation is implemented in full	Applicant's response at Deadline 8
					Unacceptable loss of woodland TPO trees (G81 on AIA) to provide construction and operational access to E12	
E13	– Solar panels have been offset from the intervening pine lines -Panels have also been offset from U6006 -Woodland planting to the northeast boundary	- Unacceptable loss of TPO woodland along the north-western boundary of E13 with the U6006 (G82 on AIA) - Visual impact from the U6006	E13 should be omitted from the scheme for ecological reasons. If this is not possible and being sensitive to the existing landscape structure… -Retain curves in U Road between E13 and E14. -Retain all existing vegetation through use of direct drilling -Provide additional hedge along and adjacent to U-Road corridor to strengthen the existing woodland planting. -Provide hedge planting along south-western boundary (along northern side of existing track).	-Consider adding planting within areas of existing vegetation and adding a secondary hedge between E12 and E13 to provide additional screening.	**Removal of E13** -Loss of TPO trees would be minimised through directional drilling of cable although this would depend on whether access to E12 was required. -Ecological benefits in relation to acid grassland, invertebrates and stone curlew **E13 retained** Unacceptable loss of TPO woodland along the north-western boundary of E13 with the U6006 (G82 on AIA) The panels in E13 would remain visible initially but effects	The Applicant has reviewed the design and has incorporated a 30m set back either side of the vegetation which lines this section of U6006 to the security fence. There will be a further 5m offset from the fence before the closest panels, so 35m in total. This will create a wide area of native grassland either side of U6006, further reducing the potential for visual impacts in glimpses through gaps in vegetation and reducing overall perception. The existing vegetation along U6006 in this location will be

Ref.	Current proposals as detailed in OLEMP [REP5-014]	Residual effects	Further mitigation required [REP4-149] and LIR [REP1-024]	Applicants mitigation under discussion/or not yet shown on EnvM –[AS-324] and/or [AS-321]	Residual effects if the Council's mitigation is implemented in full	Applicant's response at Deadline 8
			(see VP15B) – outside the RPA of the veteran trees (T216 and T218) -Remove panels from the existing area of acid grassland.		would reduce to an acceptable level as vegetation matures -Ecological benefits in relation to acid grassland, invertebrates	strengthened through natural regeneration and interplanting. This is noted on the Environmental Masterplan [**REP7-054**] and in the OLEMP [**REP7-015**] submitted at D7
E14	– Solar panels have been offset from the intervening pine lines -Panels have also been offset from U6006 -Increased width of planting to 15m along the western edge of E14 to E16 to further screen views from U6006 [AS-321]	- Views to the BESS from the U6006 would remain particularly in winter -Views of panels from the U6006 within E14 initially and then in winter would remain including through access points -Truncation of views to the east from the U6006 particularly in summer -Views of the BESS from the wider countryside would remain	Being sensitive to the existing landscape structure… -Strengthen the boundaries between this parcel, E13 and E15 by planting additional pines. -Along eastern boundary repair and strengthen the pine lines. -Provide better screening in northern corner of E14 by planting up a triangular corner of sufficient size. -Reinforce pine lines/tree belts along the western eastern boundaries	-	-BESS and substation and panels in E14 would remain visible initially but effects would reduce to an acceptable level as vegetation matures aided by the strengthening of treelines -Truncation of views to the east from the U6006 particularly in summer	Notes have been added to the Environmental Masterplans [**REP7-054**] and OLEMP [**REP7-015**] to explain that existing pine lines on the boundaries between parcels will be strengthened through interplanting. The proposed planting on the western edge and interplanting on the other boundaries negates the need to divide this field and change the landscape pattern. The western boundary adjacent to U6006 will be reinforced through a pine line with a shrub

Ref.	Current proposals as detailed in OLEMP [REP5-014]	Residual effects	Further mitigation required [REP4-149] and LIR [REP1-024]	Applicants mitigation under discussion/or not yet shown on EnvM –[AS-324] and/or [AS-321]	Residual effects if the Council's mitigation is implemented in full	Applicant's response at Deadline 8
						understorey with a width of 15m.
E15	– solar panels have been offset from the intervening pine lines -panels have also been offset from U6006 -Increased width of planting to 15m along the western edge of E14 to E16 to further screen views from U6006 [AS-321]	- views to the BESS from the U6006 would remain particularly in winter -views of panels from the U6006 within E15 initially and then in winter would remain including through access points -truncation of views to the east from the U6006 particularly in summer -views of the BESS from the wider countryside would remain	Being sensitive to the existing landscape structure… -strengthen the boundary between this parcel, E14 and E16 by planting additional pines. -Along eastern boundary repair and strengthen the pine lines. -reinforce pine lines/tree belts along the western boundary - Create visual corridor north of the tree belt on the southern boundary by using the existing track for access and screening the solar panels by planting up a sufficiently large triangular area in the southwestern corner of E15	-	-BESS and substation and panels in E15 would remain visible initially but effects would reduce to an acceptable level as vegetation matures aided by the strengthening of treelines -Truncation of views to the east from the U6006 particularly in summer but there would be some relief to this at the visual corridor along the treeline	Notes have been added to the Environmental Masterplans [**REP7-054**] and OLEMP [**REP7-015**] to explain that existing pine lines on the boundaries between parcels will be strengthened through interplanting. The proposed planting on the western edge and interplanting on the other boundaries negates the need to divide this field and change the landscape pattern. The western boundary adjacent to U6006 will be reinforced through a pine line with a shrub understorey with a width of 15m.
E16	– solar panels have been offset from the intervening pine lines	- views to the BESS from the U6006 would	Being sensitive to the existing landscape structure…	-	-BESS and substation and panels in E16 would remain visible	Notes have been added to the added to the Environmental

Ref.	Current proposals as detailed in OLEMP [REP5-014]	Residual effects	Further mitigation required [REP4-149] and LIR [REP1-024]	Applicants mitigation under discussion/or not yet shown on EnvM –[AS-324] and/or [AS-321]	Residual effects if the Council's mitigation is implemented in full	Applicant's response at Deadline 8
	-panels have also been offset from U6006 -Increased width of planting to 15m along the western edge of E14 to E16 to further screen views from U6006 [AS-321]	remain particularly in winter -views of panels within E16 from the U6006 and from Elms Road initially and then in winter would remain including through access points -truncation of views to the east from the U6006 particularly in summer -views of the BESS from the wider countryside would remain	-reinforce pine lines/tree belts along the southern edge (see VP15B VP21, VP21A). -strengthen the boundary between this parcel and E15 by planting additional pines. -Along eastern boundary repair and strengthen the pine line. -reinforce pine lines/tree belts along the western boundary.		initially but effects would reduce to an acceptable level as vegetation matures aided by the strengthening of treelines -truncation of views to the east from the U6006 particularly in summer	Masterplans [**REP7-054**] and OLEMP [**REP7-015**] to explain that existing pine lines on the boundaries between parcels will be strengthened through interplanting. A linear belt of trees and shrubs along the southern boundary (15m wide) linking with pine lines with a shrub understorey on the western boundary (15m wide) will fulfil the screening function requested.
E17	-proposed tree belt to the east (shown on EnvM)	-open views of BESS and substation at E18 particularly relevant if offsite woodland is removed or thinned in the future.	Being sensitive to the existing landscape structure… - repair and strengthen the pine line on north-western boundary -provide tree belt along southern boundary of E17 with E18 to improve screening of BESS.	-	-BESS and substation would remain visible initially but effects would reduce as vegetation matures	A pine line with a shrub understorey and a width of 10m is proposed along the southern edge. Interplanting will strengthen existing screening to the west. E17 is internal to the site and will be screened by 25m width of woodland along Elms Road and earthworks and

Ref.	Current proposals as detailed in OLEMP [REP5-014]	Residual effects	Further mitigation required [REP4-149] and LIR [REP1-024]	Applicants mitigation under discussion/or not yet shown on EnvM –[AS-324] and/or [AS-321]	Residual effects if the Council's mitigation is implemented in full	Applicant's response at Deadline 8
						existing woodland to the north and east. A linear belt of trees and shrubs with a width of 25m is proposed to the north of Elms Road to reinforce screening an enclosure provided by the existing hedgerow. Internal field boundaries between parcels will be strengthened through inter-planting and natural regeneration [**REP7-054**]
E18	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. -Increased width of planting along the edge of E18 to 25m -The tonal rendering of shades which are	-visual effects of proposed BESS prominent from Elms Road in particular in winter and from the west in the wider landscape -BESS would remain visible in the wider landscape from the north and the west particularly relevant if offsite woodland is removed in the future.	-Provide tree belt along southern boundary of E17 towards BESS in E18. (see VP16) -strengthen tree belts within parcels 14- 17 to provide layers of landscape screening -re-instate any hedgerows removed behind the visibility splays. -Environmental colour Assessment to be undertaken at detailed	-	-The BESS and other solar infrastructure would remain visible and incongruent in the landscape initially including from the U6006 and the wider landscape to the north and west and from Elms Road, although the effects would be tempered by the tonal rendering of shades of structures.	A linear belt of trees and shrubs with a width of 25m is proposed to the north of Elms Road to reinforce screening and enclosure provided by the existing hedgerow. Internal field boundaries between parcels will be strengthened through inter-planting and natural regeneration [**REP7-054**].

Ref.	Current proposals as detailed in OLEMP [REP5-014]	Residual effects	Further mitigation required [REP4-149] and LIR [REP1-024]	Applicants mitigation under discussion/or not yet shown on EnvM –[AS-324] and/or [AS-321]	Residual effects if the Council's mitigation is implemented in full	Applicant's response at Deadline 8
	suitable to integrate within the landscape will help reduce the perceived overall mass of these structures. -land uses and proposed structures are consolidated in proximity to Worlington Quarry and Bay Farm solar farm	-unclear whether and how much of the existing hedgerow will need to be removed to facilitate the access to the BESS -colour of external finishes for structures to be green, light grey or white	design stage to inform the external finishes of the structures		-As the vegetation matures the effects would reduce particularly in the summertime. The layers of screening provided by the strengthening of existing tree lines as well as new planting would provide an effective framework for the proposed development. -Woodland planting on both sides of Elms Road significantly changes character -Unclear whether and how much of the existing hedgerow will need to be removed to facilitate the access to the BESS	
E19	– The solar panels have been located to reflect the landscape pattern and retain the intervening pine lines. -New woodland proposed on the	-Panels visible from the existing PRoW to the south of E19 and close to the reservoir -Panels prominent from the permissive path on the northwest boundary of E19	-plant a tree belt to reinforce the planting along Elms Road -Water reservoir: Plant up the triangular area on the south-western side of the reservoir within parcel E19	-review screening around reservoir between E22 and E19 and consider hedgerow planting in corners adjacent to the reservoir	-Initially the panels would remain visible from the existing PRoW to the south of E22, particularly through gaps and close to the reservoir however this would	A pine line with a shrub understorey is proposed along the western boundary with a width of 25m to reinforce screening from the adjacent permissive path and

Ref.	Current proposals as detailed in OLEMP [REP5-014]	Residual effects	Further mitigation required [REP4-149] and LIR [REP1-024]	Applicants mitigation under discussion/or not yet shown on EnvM –[AS-324] and/or [AS-321]	Residual effects if the Council's mitigation is implemented in full	Applicant's response at Deadline 8
	northwest and southwest around perimeter of the parcel to reduce the visibility from the PRoW, as well as screen the structures and reduce the perception of the Scheme from Badlingham;	-Woodland planting on both sides of Elms Road significantly changes character	(Locations for tree groups?) -Strengthen internal treelines between E19, E20 and E21 (see VP 20). -careful design of permissive path required to retain privacy of adjacent landowner		reduce to an acceptable level as vegetation matures. -The panels would be prominent form the permissive path on the northwest boundary of E19 but as the vegetation matures the amenity of the footpath would improve particularly if it were located within the woodland belt. -Woodland planting on both sides of Elms Road significantly changes character	Brooklands stud. Belts of trees and shrubs are also proposed to strengthen existing vegetation to the north and south with a width of 10m. Internal boundaries will be strengthened through inter-planting and natural regeneration. Planting the corners of the reservoir would prevent safe access to the reservoir and cannot be accommodated here. The existing hedgerow to the south provides effective screening. [**REP7-054**]
E20	-The solar panels have been located to reflect the landscape pattern and retain the intervening pine lines. -New woodland is proposed around the eastern and north-eastern perimeter of the parcel to reduce	-Multiple barriers between the traveller's site and the scheme unlikely to give cohesive approach -Proposed additional planting welcomed but unlikely to screen the proposals effectively -Woodland planting on both sides of Elms	-Strengthen internal treelines between E20, E19 and E21 (see VP 20). -On the eastern side of the parcel increase buffer between fence and solar panels to 30m and provide tree belt with hedgerows on	-Applicant proposes to increase the width of planting along the eastern edge of E20 to 15m to screen views from residents adjacent to Bridge End Road (not yet shown on EnvM)	-Initially the panels would remain visible to the residents on the traveller's site however this would reduce to an acceptable level as vegetation matures. - Loss of view for the neighbouring residents would remain	Notes have been added to the Environmental Masterplans [**REP7-054**] and OLEMP [**REP7-015**] to explain that existing pine lines on the boundaries between parcels will be strengthened through interplanting. Linear

Ref.	Current proposals as detailed in OLEMP [REP5-014]	Residual effects	Further mitigation required [REP4-149] and LIR [REP1-024]	Applicants mitigation under discussion/or not yet shown on EnvM –[AS-324] and/or [AS-321]	Residual effects if the Council's mitigation is implemented in full	Applicant's response at Deadline 8
	the visibility from residents adjacent to Bridge End Road.	Road significantly changes character -Loss of view for the neighbouring residents -Woodland planting on both sides of Elms Road significantly changes character	either side for visual amenity purposes.		-Woodland planting on both sides of Elms Road significantly changes character	belts of trees and shrubs to the north will be 10m and to the east will be 15m wide. A timber closed boarded fence will also line the eastern boundary to screen views from the adjacent travellers' site. The distance between the site boundary and proposed solar panel arrays is 30m or greater in this location.
E21	-The solar panels have been located to reflect the landscape pattern and retain the intervening pine lines. -New woodland is proposed on the south-eastern boundary to reduce the visibility from residents adjacent to Bridge End Road.	-Infrastructure visible from businesses on Bridge End Road	-Strengthen internal treelines between E20, E19 E21 and E22 (see VP 20). -Extend the 30m enhanced planting requested on the eastern side of E20	-	-Initially the panels would remain visible from businesses on Bridge End Road but would reduce to an acceptable level as the vegetation matures	Notes have been added to the Environmental Masterplans [**REP7-054**] and OLEMP [**REP7-015**] to explain that existing pine lines on the boundaries between parcels will be strengthened through interplanting. Linear belts of trees and shrubs to east will be 15m wide. The distance between the site boundary and proposed solar panel

Ref.	Current proposals as detailed in OLEMP [REP5-014]	Residual effects	Further mitigation required [REP4-149] and LIR [REP1-024]	Applicants mitigation under discussion/or not yet shown on EnvM –[AS-324] and/or [AS-321]	Residual effects if the Council's mitigation is implemented in full	Applicant's response at Deadline 8
						arrays is 30m or greater in this location.
E22	-The solar panels have been located to reflect the landscape pattern and retain the intervening pine lines. -New woodland is proposed around the eastern and southwestern boundary of the parcel to reduce the visibility from businesses adjacent to Bridge End Road and local PRoW.	-Panels visible from the existing PRoW to the south of E22, particularly through gaps and close to the reservoir -Infrastructure visible from businesses on Bridge End Road	-Water reservoir: Plant up the triangular area on the south-eastern side of the reservoir within parcel E22 extending along the boundary with the reservoir as necessary. (Locations for tree groups?) -Strengthen internal treelines between E22, E21. -Extend the 30m enhanced planting requested on the eastern side of E20 and E21	-Review screening around reservoir between E22 and E19 and consider hedgerow planting in corners adjacent to the reservoir	-Initially the panels would remain visible from the existing PRoW to the south of E22, particularly through gaps and close to the reservoir however this would reduce to an acceptable level as vegetation matures. -Effects would also reduce to an acceptable level in relation to Bridge end road as the vegetation matures	Planting the corners of the reservoir would prevent safe access to the reservoir and cannot be accommodated here. The existing hedgerow to the south provides effective screening and will be strengthened through tree and shrub planting with a width of 10m, as shown on the Environmental Masterplans [**REP7-054**] The distance between the site boundary and proposed solar panel arrays is 30m or greater in this location.
E24	– New woodland planting is proposed to the north, and east of the parcel to screen the structures and reduce the perception of the scheme when travelling along Worlington Road;	-Long distance views from U6006 across landscape to panels would remain -potential visual effects around the access from Worlington Road into	-Provide appropriate screen planting along western boundary of the parcel, incl. hedges and pines to screen these parcels to views from the U6006.	-Applicant has stated that they have reviewed this suggested change, there is an existing bund and vegetation, but no further planting can be accommodated	-Initially long-distance views from U6006 across landscape to panels would remain however these would reduce to an acceptable level as vegetation matures	This was reviewed on site. There is existing vegetation in the northern part, which will be retained. Earthworks extend along the boundary and preclude additional planting. Intervening

Ref.	Current proposals as detailed in OLEMP [REP5-014]	Residual effects	Further mitigation required [REP4-149] and LIR [REP1-024]	Applicants mitigation under discussion/or not yet shown on EnvM –[AS-324] and/or [AS-321]	Residual effects if the Council's mitigation is implemented in full	Applicant's response at Deadline 8
		the parcels would remain -unacceptable loss of TPO trees for cable crossing of U6006 north of E24	-Identify access points on Environmental Masterplan.	due to space constraints.		vegetation provides an effective screen in views from the U6006.
E25	-New woodland planting is proposed to the east and south of the parcel to screen the structures and reduce the perception of the scheme when travelling along Worlington Road;	-Long distance views from U6006 across landscape to panels would remain -Potential visual effects around the entrance from Worlington Road into the parcels would remain	-Provide appropriate screen planting along western boundary of these parcels, incl. hedges and pines to screen these parcels to views from the U6006. -Identify access points on Environmental Masterplan.	-Applicant has stated that they have reviewed this suggested change, there is an existing bund and vegetation, but no further planting can be accommodated due to space constraints.	- Initially long-distance views from U6006 across landscape to panels would remain however these would reduce to an acceptable level as vegetation matures	This was reviewed on site. There is existing vegetation in the northern part, which will be retained. Earthworks extend along the boundary and preclude additional planting. Intervening vegetation provides an effective screen in views from the U6006.
E26-E27	-Panels are offset from the boundary vegetation.	-Views across the rear of the panels from permitted path to the north will remain	-Consider a hedgerow to soften the impact of the panels when viewed from the path	-Path running along northern edge of E26 and E27, considering the addition of a hedgerow.	-Panels would be visible initially but as vegetation matures it would provide screening	An additional hedgerow along the northern edge of E26 would enclose permissive path and reduce natural surveillance and cannot be accommodated in this location. Interpretation boards added at key intersections of the permissive paths and

Ref.	Current proposals as detailed in OLEMP [REP5-014]	Residual effects	Further mitigation required [REP4-149] and LIR [REP1-024]	Applicants mitigation under discussion/or not yet shown on EnvM –[AS-324] and/or [AS-321]	Residual effects if the Council's mitigation is implemented in full	Applicant's response at Deadline 8
						local road network to enhance wayfinding and legibility [**REP7-054**].
E28-E29	-Panels offset from the boundary vegetation.	-views of solar infrastructure in winter through porous tree screen/woodland	- Additional hedge should be included between the DCO limits and the track along the south of E28 and E29.	-	-	There is already dense vegetation along the southern edge of E28 and E29 and an additional hedgerow provides no additional benefit to screening [**REP7-054**].
E30	– The woodland in the south-east part of the Site has been retained. -Additional hedgerow and woodland planting are proposed adjacent to Golf Links Road (30m) -Woodland to the north of the parcel and east of the existing access to be retained and planting in gaps in vegetation on northern edge	-Views of vast expanse of solar panels for motorists on Golf links road (VP24) through existing gaps and entrances initially -Perception of the Scheme in relation to Worlington.	-Additional hedges along the western boundary of E30. -Remove security fence from the retained woodland -Strengthen hedge between E30 and E31 as required.	-	-Initially vast extent of panels across E30 would persist however this would reduce as vegetation matures (VP24)	The design of the Scheme has been altered to retain the existing recent tree and shrub planting at the site entrance. Fully planting up this gap is not possible due to access requirements for the Scheme and the permissive path. A substantial belt of tall evergreen trees lines the boundary between E30 and E31. No additional planting is required [**REP7-054**].

Ref.	Current proposals as detailed in OLEMP [REP5-014]	Residual effects	Further mitigation required [REP4-149] and LIR [REP1-024]	Applicants mitigation under discussion/or not yet shown on EnvM –[AS-324] and/or [AS-321]	Residual effects if the Council's mitigation is implemented in full	Applicant's response at Deadline 8
E31	– The woodland in the southern part of the Site has been retained. -Additional hedgerow and woodland planting are proposed adjacent to Golf Links Road (30m) to screen views for motorists and from views from the wider landscape to the north.	-Views of solar panels for motorists on Golf links road (VP25) through existing gaps and entrances initially -Views of vast expanse of solar panels from the wider landscape to the north.	-Provide hedge between E31 and E32. -Provide internal hedge within E31 to break up expanse of solar panels.	-	-Initially vast extent of panels across E31 and E32 would persist however this would reduce as vegetation matures (VP25 and VP26A)	E31 is a large field enclosed by existing vegetation and proposed planting. There are technical constraints to the land outside of E32 to the north relating to the archaeological mitigation area. This will be native grassland. A hedgerow has been added to the corner adjacent to the archaeological mitigation area to avoid impacting it and provide screening into this part of the site [**REP7-054**].
E32	– The woodland in the south-east part of the Site has been retained. -Additional hedgerow and woodland planting are proposed adjacent to a short section of Golf Links Road (30m)	-Unknown impact on vegetation to form access I off the A11 -Unacceptable views of vast expanse of solar panels for motorists on the corner of Golf Links Road on the home stretch to Worlington. -Views from the wider landscape to the north,	-Plant up entire north-eastern corner (outside developable area) of E32 with woodland including oaks (see VP26A) avoiding archaeological constraints and access visibility splays to screen views of the panels and provide a	-Review screening in this location and move proposed planting away from the barrow. -Applicant to provide further detail on design and transport constraints on screening at this location.	-Unknown impact on vegetation to form access I off A11 -Initial views of vast expanse of solar panels would reduce as vegetation matures -Views from the wider landscape to the north	The design has been amended to work around the archaeological constraints in the corner of E32, comprising and hedgerow with trees. Views into this part of the site from the road

Ref.	Current proposals as detailed in OLEMP [REP5-014]	Residual effects	Further mitigation required [REP4-149] and LIR [REP1-024]	Applicants mitigation under discussion/or not yet shown on EnvM –[AS-324] and/or [AS-321]	Residual effects if the Council's mitigation is implemented in full	Applicant's response at Deadline 8
		persisting into the long-term.	positive focus on this corner. -Provide more robust planting along the south-eastern edge of E32 and provide screening of solar panels at access.		would reduce as vegetation matures.	and filtered by existing vegetation [**REP7-054**].

4 Sunnica West Site A

Ref.	Current proposals as detailed in OLEMP [REP5-014]	Residual effects	Further mitigation required [REP4-149] and LIR [REP1-024]	Applicants mitigation under discussion/or not yet shown on EnvM –[AS-324] and/or [AS-321]	Residual effects if the Council's mitigation is implemented in full	Applicant's response at Deadline 8
W01	No longer proposed.	Effects from the construction of the cable route. Not fully assessed on their own.	Proposals for post-construction landscape and ecology restoration required.	This has not yet been discussed with the applicant and no proposals have been submitted.	Currently unclear. If no vegetation is lost and land restored after construction, landscape and visual effects are expected to be short term only.	Omitted from the Scheme. The replacement of vegetation removed to facilitate construction of the cable route will be addressed in accordance with the OLEMP [**REP7-015**].
W02	No longer proposed.	Effects from the construction of the cable route. Not fully assessed on their own.	Proposals for post-construction landscape and ecology restoration required.	This has not yet been discussed with the applicant and no proposals have been submitted.	Currently unclear. If no vegetation is lost and land restored after construction, landscape and visual effects are expected to be short term only.	Omitted from the Scheme. The replacement of vegetation removed to facilitate construction of the cable route will be addressed in accordance with the OLEMP [**REP7-015**].
ECO4	No longer proposed.	Effects from the construction of the cable route. Not fully assessed on their own.	Proposals for post-construction landscape and ecology restoration required.	This has not yet been discussed with the applicant and no proposals have been submitted.	Currently unclear. If no vegetation is lost and land restored after construction, landscape and visual effects are expected to be short term only.	Omitted from the Scheme. The replacement of vegetation removed to facilitate construction of the cable route will be addressed in accordance with the OLEMP [**REP7-015**].

Ref.	Current proposals as detailed in OLEMP [REP5-014]	Residual effects	Further mitigation required [REP4-149] and LIR [REP1-024]	Applicants mitigation under discussion/or not yet shown on EnvM –[AS-324] and/or [AS-321]	Residual effects if the Council's mitigation is implemented in full	Applicant's response at Deadline 8
W03	Siting the solar panels between woodland blocks and Foxburrow Plantation and reinforcing the vegetation patterns with new woodland planting to aid in screening this part of the Scheme from the wider landscape and retaining a physical separation from Chippenham Road and Snailwell.	The proposed woodland block on the north-western edge of W03 would **block the long-distance views** across the undulating landscape to the south-east from Bridleway 204/5 (VP41). **Loss of TPO trees**: Although it has now been proposed to retain the TPO trees at the existing Field entrance north-west of W03, the crown lifting will have a negative impact on the avenue's appearance. There is further a risk that the trees either side of the access will be damaged through vehicle overrun and soil compaction. It is expected that three trees would need to be removed at the north-eastern end of the avenue to enable the cable route (AIA)	Without prejudice, the DCO limits need to be moved further south-east, so that panels and mitigative planting would be situated in such a way that the views would be retained long-term. (See VP41). The use of the existing field track should be omitted from the scheme and an access created within the cable corridor to minimise the adverse effects on the avenue on Chippenham Road. Unless the cable is installed by directional drilling that would then avoid the loss of the 2 or 3 TPO trees which would be a preferable solution.	This has not yet been discussed with the applicant. This has been discussed with the applicant, but insufficient progress was made. The suggestion of using horizontal drilling has been made to the applicant but no response has been forth coming or confirmation as to how many TPO trees will be lost.	The residual visual impacts on the Prow 204/5 (VP41) would be significantly reduced, beginning from construction, as the works in W03 would be screened by landform. The young avenue on Chippenham Road would remain visually coherent and largely intact. In the medium to long-term it is expected that there would be no residual visual effects form this location, as the long- distance view would be retained and the solar panels would be screened by a hedge. However, detrimental effects on the historic landscape and the setting of the Chippenham	The applicant has confirmed that the existing Chippenham Road access is required for construction and operation. The applicant maintains that crown lifting a single tree (T332) will not result in a significant impact on the tree or have a negative impact on the Chippenham Road avenue as a whole. The tree has already been subject to crown lifting for the existing highway clearance and there is a degree of variation in crown heights and forms across Chippenham Road avenue trees. The new access to the north east north is required for construction only. The use of trenchless installation would not

Ref.	Current proposals as detailed in OLEMP [REP5-014]	Residual effects	Further mitigation required [REP4-149] and LIR [REP1-024]	Applicants mitigation under discussion/or not yet shown on EnvM –[AS-324] and/or [AS-321]	Residual effects if the Council's mitigation is implemented in full	Applicant's response at Deadline 8
		(hedgerow plan says two trees to be removed). **Loss of trees** from south-eastern corner of W03 (W256, AIA).			Registered Park and Garden remain. Trees would still be lost from south- western corner of W03 (W256, AIA).	avoid tree loss due to the requirement for access in this location (at this stage). The extent of the TPO is based on its spatial positioning (as plotted by ECDC) and ECDC have clarified in writing that this may not be spatially accurate and that tree T336 (which is to be removed and which is located outside of the TPO boundary) was intended to be protected by the TPO designation (as indicated by the text in the TPO document), on this basis it would increase the number of trees subject to TPO to be removed in this location to three (only two trees subject to TPO are reported to be removed in this location in the AIA Report **[REP7-046].**

Ref.	Current proposals as detailed in OLEMP [REP5-014]	Residual effects	Further mitigation required [REP4-149] and LIR [REP1-024]	Applicants mitigation under discussion/or not yet shown on EnvM –[AS-324] and/or [AS-321]	Residual effects if the Council's mitigation is implemented in full	Applicant's response at Deadline 8
						Tree loss is considered unavoidable at this stage. Tree impacts (including the loss of a section of tree group W256 from the north eastern corner of parcel W03) are considered to be a reasonable worst case and will be reviewed and improved upon where possible as part of the detailed design. The final extent of tree loss and measures for tree protection will be issued to the Planning Authority for approval in advance. This is secured in the FCEMP **[REP7-033]**
ECO5	Hedgerow proposed along south-eastern edge on Environmental Plan, in addition to existing retained hedge.		Retained hedgerows north-west and south-east of ECO5 should be included on the Hedgerow plans.	Hedgerow Plans are under review.		Existing vegetation which will be retained within the Scheme is shown on the Environmental Masterplans [**REP7-054**].
W04	New native chalk grassland across part	The placement of solar panels within the	Without prejudice, as for W10 the extent of	This has not been discussed in detail with	Even with the set-back the residual changes to	The hedgerow along the north western

Ref.	Current proposals as detailed in OLEMP [REP5-014]	Residual effects	Further mitigation required [REP4-149] and LIR [REP1-024]	Applicants mitigation under discussion/or not yet shown on EnvM –[AS-324] and/or [AS-321]	Residual effects if the Council's mitigation is implemented in full	Applicant's response at Deadline 8
	of the parcel, in response to below ground archaeology. The solar panels have also been sited away from The Avenue so that new woodland can be implemented. A temporary fence, rendered in a colour to aid its integration in the landscape will also be implemented in relation to views from Godolphin Gallops, until the establishment of the proposed planting, secured via the OLEMP.	setting of, and in close proximity to, the Registered Park and Garden, eliminates the currently existing time-depth of this area and detrimentally undermines the legibility of The Avenue in the landscape. Although The Avenue to Chippenham Estate is in many parts densely vegetated, there are gaps that allow views out of the corridor, especially to the west towards parcel W04.	the solar panels should be located to ensure a physical separation from the boundary wall of Chippenham Park and Chippenham Hall. Therefore, the off-set of the solar panels from the outer edge of The Avenue should be the same distance as W10 is set back from Chippenham Park The gaps in Avenue should be closed with appropriate planting suitable to the landscape character.	the applicant as the Councils' primary position remains that this development is unsuitable for the historic landscape, and the resulting effects are not capable of being sufficiently mitigated to be made acceptable.	the character of the historic landscape and views to and from The Avenue result in substantial detrimental effects, on the setting of the RPG. This is compounded by the fact that mitigation planting in form of hedging would be inappropriate in this landscape, as the hedge would run diagonal to the existing and historic field pattern.	boundary of W04 follows an existing field boundary [**REP7-054**]. Additional planting within the Avenue is shown on the Environmental Masterplans [**REP7-054**] to reinforce the original alignment. The detail of this planting will be agreed post-consent. The avenue was historically intended to provide views through. This would be prevented if the gaps were closed and would cause additional impacts to the RPG.
W05	Siting the solar panels away from The Avenue so that new woodland can be implemented along the southern edges of the parcel, which is considered appropriate in the context of the Avenue and Chippenham Park.	The proposals for this parcel are unclear. The placement of solar panels within the setting of, and in close proximity to, the Registered Park and Garden, eliminates the currently existing time-	Without prejudice, as for W10 the extent of the solar panels should be located to ensure a physical separation from the boundary wall of Chippenham Park and Chippenham Hall. Therefore, the off-set of the solar panels from the outer edge of The	This has not been discussed in detail with the applicant as the Councils' primary position remains that this development is unsuitable for the historic landscape, and the resulting effects are not capable of being	Even with the set-back the residual changes to the character of the historic landscape and views to and from The Avenue are substantial and result in detrimental effects, including the elimination of the experience of time-	The existing hedgerow along the north eastern boundary of W05 follows an existing field boundary [**REP7-054**] and will be reinforced with additional tree and shrub planting to enhance habitat

Ref.	Current proposals as detailed in OLEMP [REP5-014]	Residual effects	Further mitigation required [REP4-149] and LIR [REP1-024]	Applicants mitigation under discussion/or not yet shown on EnvM –[AS-324] and/or [AS-321]	Residual effects if the Council's mitigation is implemented in full	Applicant's response at Deadline 8
	There would also be a new woodland mix along the southern edge of the parcel which would include a higher percentage of evergreen species and a temporary fence, rendered in a suitable colour, to screen views from motorists on the A14, secured via the OLEMP.	depth of this area and detrimentally undermines the legibility of The Avenue in the landscape. The inclusion of a clump of conifers changes the species composition and the character of The Avenue (RPG).	Avenue should be the same distance as W10 is set back from Chippenham -Any gaps in Avenue should be closed with appropriate planting suitable to the landscape character.	sufficiently mitigated to be made acceptable.	depth within the setting of the RPG. This is compounded by the fact that mitigation planting in form of hedging would be inappropriate in this landscape, as the hedge would run diagonal to the existing and historic field pattern.	connectivity and enclosure. Additional planting within the Avenue is shown on the Environmental Masterplans [**REP7-054**] to reinforce the original alignment. The detail of this planting will be agreed post-consent.
W06	New woodland planting to the west of the parcel, to reduce their visibility in longer distance views from The Limekilns, as well as provide new vegetation links across the landscape. The existing woodland between these parcels has also been retained, with panels and associated infrastructure offset from the woodland.	The proposals are unclear, as the parcel boundaries run north-west and south- west. On the south-western boundary The Environmental Plan (sheet 13) shows 'planting to reinforce the existing hedgerow between parcels W05 and W07', which appears to continue between W05 and W06. This is welcome.	Without prejudice, as for W10 the extent of the solar panels should be located to ensure a physical separation from the boundary wall of Chippenham Park and Chippenham Hall. Therefore, the off-set of the solar panels from the outer edge of The Avenue should be the same distance as W10 is set back from Chippenham Park. The hedge along the north-western	This has not been discussed in detail with the applicant as the Councils' primary position remains that this development is unsuitable for the historic landscape, and the resulting effects are not capable of being sufficiently mitigated to be made acceptable.	A long-term increase in residual effects on existing (and proposed) trees can be avoided, if the siting of panels takes account of accurate shading predictions. Even with the set-back the residual changes to the character of the historic landscape and views to and from The Avenue are substantial and result in detrimental effects, including the	The future shading of panels is taken account of in the layout and design of the Scheme allowing for future growth as set in the OLEMP [**REP7-015**]. The proposed planting follows existing field boundaries to enhance habitat connectivity and enclosure [**REP7-054**].

Ref.	Current proposals as detailed in OLEMP [REP5-014]	Residual effects	Further mitigation required [REP4-149] and LIR [REP1-024]	Applicants mitigation under discussion/or not yet shown on EnvM –[AS-324] and/or [AS-321]	Residual effects if the Council's mitigation is implemented in full	Applicant's response at Deadline 8
			boundary of W06 (H15) is the only one that has been identified by the applicant to be an important hedgerow under the Hedgerow Regulations 1997 [APP-079, Appendix 8C - Terrestrial Habitats and Flora Report, 5.3.1. and Fig 3.2]. It contains several mature beech trees. Where W06 extends to the hedge, the off- set from this hedge should be no less than 10m form the outer rim of the canopy of the mature hedgerow trees to preserve the RPAs and improve the likelihood of its successful establishment. However, potential shading of solar panels by the existing and proposed trees should be allowed for, which		elimination of the experience of time-depth within the setting of the RPG. This is compounded by the fact that mitigation planting in form of hedging would be inappropriate in this landscape, as the hedge would run diagonal to the existing and historic field pattern.	

Ref.	Current proposals as detailed in OLEMP [REP5-014]	Residual effects	Further mitigation required [REP4-149] and LIR [REP1-024]	Applicants mitigation under discussion/or not yet shown on EnvM –[AS-324] and/or [AS-321]	Residual effects if the Council's mitigation is implemented in full	Applicant's response at Deadline 8
			may require a far greater set back, to account also for future growth of these trees. This should be properly calculated. Off-sets should be calculated in all areas to allow for future growth and to avoid shading issues.			
W07	New woodland planting to the west of the parcels, to reduce their visibility in longer distance views from The Limekilns, as well as provide new vegetation links across the landscape. The existing woodland between these parcels has also been retained, with panels and associated infrastructure offset from the woodland.	The proposals are unclear, as the parcel boundaries run north-west and south- west. On the south-western boundary The Environmental Plan (sheet 13) shows 'planting to reinforce the existing hedgerow between parcels W05 and W07', which appears to continue between W05 and W06. This is welcome. However, the Arboricultural Impact	Without prejudice, the proposals should be amended to enable the full retention of the existing woodland within W07. The internal access road would need to be slightly re-routed. Off-sets should be calculated in all areas to allow for future growth and to avoid shading issues.	This has been discussed with the applicant, but insufficient progress was made.	The residual effects would be reduced as the woodland landscape feature would be retained in full. However, detrimental residual effects on the historic landscape and the setting of the Chippenham Registered Park and Garden remain.	The existing woodland within W07 will be retained and the future shading of panels is taken account of in the layout and design of the Scheme allowing for future growth as set in the OLEMP [**REP7-015**]. The retention of existing woodland limits effects on the setting of Chippenham Hall Registered Park and Garden.

Ref.	Current proposals as detailed in OLEMP [REP5-014]	Residual effects	Further mitigation required [REP4-149] and LIR [REP1-024]	Applicants mitigation under discussion/or not yet shown on EnvM –[AS-324] and/or [AS-321]	Residual effects if the Council's mitigation is implemented in full	Applicant's response at Deadline 8
		Assessment shows a partial removal of the existing woodland located within W07 (this removal is not shown on the Environmental Plan).				
W08	Limiting the extent of the solar panels across these fields, so as to respond positively to below ground archaeology. New native grassland would extend across the archaeological areas, to create a continuous sward of grassland with that which will be present under the panels	This does not address the adverse landscape impacts on the historic landscape. It may be difficult to establish a continuous sward. **Tree loss:** Likely in eastern corner of the parcel. Trees have not yet been fully assessed.	Without prejudice, if this parcel is consented to be developed, its north-western boundary should be brought in line with the boundaries of W06 and W10 to maintain the openness of the watercourse corridor and the riparian landscape. The Environmental Masterplan (Sheet 4 of 5) appears to indicate Hedgerow planting along the north-eastern and north-western sides of W08; this should be included in the OLEMP and on the Hedgerow Plan (page 6). If W08 is consented in its entirety, then a	This has not been discussed in detail with the applicant as the Councils' primary position remains that this development is unsuitable for the historic landscape, and the resulting effects are not capable of being sufficiently mitigated to be made acceptable.	If W08 was reduced to finish at along the same boundary line as W06, the corridor of the watercourse would be more consistent and uninterrupted. Potential shading problems would be avoided (existing poplars on western side of W08). If W08 was not reduced in size, an additional hedge on the western side would help to embed the parcel into the landscape by additional screening.	This parcel will be enclosed by existing vegetation and proposed planting on all sides, limiting its perception from the wider landscape. Native grassland will extend beneath the panels, providing a continuous sward between the south western edge of West Site A at ECO5 and the northern edge of W10 at La Houge Road [**REP7-054**]. The retention of existing vegetation limits effects on the setting of Chippenham Hall Registered Park and Garden.

Ref.	Current proposals as detailed in OLEMP [REP5-014]	Residual effects	Further mitigation required [REP4-149] and LIR [REP1-024]	Applicants mitigation under discussion/or not yet shown on EnvM –[AS-324] and/or [AS-321]	Residual effects if the Council's mitigation is implemented in full	Applicant's response at Deadline 8
			hedge should also be provided along the south- western boundary, opposite the CWS.		However, detrimental residual effects on the historic landscape and the setting of the Chippenham Registered Park and Garden remain.	
W09	Limiting the extent of the solar panels across these fields, so as to respond positively to below ground archaeology. New native grassland would extend across the archaeological areas, to create a continuous sward of grassland with that which will be present under the panels	This does not address the adverse landscape impacts on the historic landscape. It may be difficult to establish a continuous sward under the solar panels. There is concern that there would be **residual visual effects from the A11**. (While visual receptors on major roads are usually considered to be of low sensitivity, it should be taken into account that there would be residual visual effects resulting from Sunnica in many locations in the wider area, so that mitigation	Without prejudice, the proposals for mitigative planting along the A11 corridor are insufficient. While there is existing planting, this includes gaps that should be closed, and the roadside planting should in general be strengthened. Hedgerow planting is indicated on the Environmental Plan (sheet 12) along the southern boundary on W09 and on the Hedgerow Plan (sheet 6). This should be included in the measures set out in the OLEMP.	This has not been discussed in detail with the applicant as the Councils' primary position remains that this development is unsuitable for the historic landscape, and the resulting effects are not capable of being sufficiently mitigated to be made acceptable.	Residual visual effects from the A11 would be reduced to close to zero over the medium to long-term. However, detrimental effects on the historic landscape and the setting of the Chippenham Registered Park and Garden remain.	Views from the A11 are short and transient from a high speed and complex section of the road close to the busy junction with the A14. Reducing the area of solar panels to accommodate additional planting is not warranted in this location for visual screening, which will be enhanced by the additional hedgerow planting already shown on the Environmental Masterplans **REP7-054]**. It is not considered that there will be detrimental effects on the Chippenham Hall Registered Park and

Ref.	Current proposals as detailed in OLEMP [REP5-014]	Residual effects	Further mitigation required [REP4-149] and LIR [REP1-024]	Applicants mitigation under discussion/or not yet shown on EnvM –[AS-324] and/or [AS-321]	Residual effects if the Council's mitigation is implemented in full	Applicant's response at Deadline 8
		of visual effects should be provided, wherever possible and appropriate.)				Garden as a result of the proposals for W09.
W10	The extent of the solar panels has been located to ensure a physical separation from the boundary wall of Chippenham Park and Chippenham Hall. New hedgerow and woodland are proposed along the northern edge of these parcels to provide visual screening from La Hogue Road. New woodland, hedgerow, mixed scrub and rush pasture is also proposed along the northern edge of W10, to provide visual screening from the same road and reinforce the existing vegetation patterns.	The proposed planting along La Hogue Road is not appropriate within the historic landscape and creates in itself an adverse visual effect. Should W10 be retained, the hedge proposed in the OLEMP and shown on the Environmental Masterplan (sheets 10 and 12) along the north-western boundary of W10 would be acceptable. The **character of the landscape** would be significantly and with regards to visual receptors, rapidly and permanently changed.	Without prejudice, a boundary hedge on north-western edge of W10 and tree belt along northern boundary of W10 (instead of tree belt along La Hogue Road) should be considered. The additional planting along the water course should allow glimpses through (more akin to existing). Should W10 be retained, the hedge proposed in the OLEMP and shown on the Environmental Masterplan (sheets 10 and 12) along the north-western boundary of W10 should be included in the Hedgerow Plans.	This has been discussed with the Applicant, some progress has been made, but further review is required to W10 be retained. The Councils' primary position remains that this development is unsuitable for the historic landscape, and the resulting effects are not capable of being sufficiently mitigated to be made acceptable.	The adverse effect resulting from inappropriate visual mitigation planting would be reduced. However, detrimental residual effects on the historic landscape and the setting of the Chippenham Registered Park and Garden remain.	An additional hedgerow has been included along the north western edge of W10, connecting with the existing hedgerow and proposed tree and shrub planting along La Hogue Road and woodland to south. This will enhance screening from the edge of Chippenham Park to the west and habitat connectivity associated with the adjacent proposed grassland and scrub mosaic habitat along the Lee Brook **REP7-054**]. Due to the retention of existing vegetation to the northwest there will be no detrimental effects on Chippenham Hall Registered Park and Garden.

Ref.	Current proposals as detailed in OLEMP [REP5-014]	Residual effects	Further mitigation required [REP4-149] and LIR [REP1-024]	Applicants mitigation under discussion/or not yet shown on EnvM –[AS-324] and/or [AS-321]	Residual effects if the Council's mitigation is implemented in full	Applicant's response at Deadline 8
			The retained hedge between W10 and W11 should be strengthened as required.			
W11	The extent of the solar panels has been located to ensure a physical separation from the boundary wall of Chippenham Park and Chippenham Hall. New hedgerow and woodland are proposed along the northern edge of these parcels to provide visual screening from La Hogue Road. New woodland, hedgerow, mixed scrub and rush pasture is also proposed along the northern edge of W10, to provide visual screening from the same road and reinforce the existing vegetation patterns.	There are no specific mitigation proposals for W11 in the OLEMP. The expanse of W11 remains too great. While further mitigation of form of infield hedges would alleviate some of the adverse visual effects from La Hogue Road and Farm, this would not be appropriate within the historic and characteristically open landscape, except on the southern side of W11. The **changes in character** to La Hogue Road as a result of enabling road works would constitute residual adverse	Without prejudice, if W11 is retained, all existing hedgerows around the parcel, including along La Hogue Road should be maintained and strengthened for the duration of the project. The additional hedgerow on the southern side of W11 (see Photomontage for VP33) should be included on the Environmental Plan and the Hedgerow Plan and be mentioned in the OLEMP. The distance between the hedgerows should be no less than 10m to provide a visual corridor.	The current proposals are the result of early discussions with the Applicant; however, the Councils' primary position remains that this development is unsuitable for the historic landscape, and the resulting effects are not capable of being sufficiently mitigated to be made acceptable.	There is very little scope to alleviate the residual effects of the proposals in this area, as mitigative planting is considered to be its own adverse impact. The residual visual impact from La Hogue Farm would be slightly reduced. However, detrimental residual effects on the historic landscape and the setting of the Chippenham Registered Park and Garden remain.	Existing hedgerows will be retained additional hedgerows are proposed to strengthen the existing landscape framework. Parcel W11 is set back from La Hogue Road to form a gap and visual corridor **REP7-054**].

Ref.	Current proposals as detailed in OLEMP [REP5-014]	Residual effects	Further mitigation required [REP4-149] and LIR [REP1-024]	Applicants mitigation under discussion/or not yet shown on EnvM –[AS-324] and/or [AS-321]	Residual effects if the Council's mitigation is implemented in full	Applicant's response at Deadline 8
	The photomontage of VP33 [APP-229] suggest a hedge at the southern edge of W11, parallel to the exiting hedge (north or W12).	effects that have not been adequately assessed.	Additional mitigation proposals would need to be provided to mitigate the adverse effects to the character of La Hogue Road resulting from enabling road works - Replacement hedging should be provided behind passing places to restore the continuity of this feature.			
W12	The extent of the solar panels has been located to ensure a physical separation from the boundary wall of Chippenham Park and Chippenham Hall. New hedgerow and woodland are proposed along the northern edge of these parcels to provide visual screening from La Hogue Road.	There are no specific mitigation proposals for W12 in the OLEMP. Should W12 be retained, the proposed grassland buffer and hedgerow planting along La Hogue Road is acceptable; however, the expanse of W12 remains too great. While further mitigation of form of infield hedges would alleviate	Without prejudice, if W12 is retained, all existing hedgerows around the parcel, including along La Hogue Road should be maintained and strengthened for the duration of the project. Additional mitigation proposals would need to be provided to mitigate the adverse effects to the character of La Hogue Road resulting from enabling road works -	The current proposals are the result of early discussions with the Applicant; however, the Councils' primary position remains that this development is unsuitable for the historic landscape, and the resulting effects are not capable of being sufficiently mitigated to be made acceptable.	However, detrimental effects on the historic landscape and the setting of the Chippenham Registered Park and Garden remain.	Existing hedgerows will be retained and additional hedgerows are proposed to strengthen the landscape framework, as shown on the Environmental Masterplans [**REP7-054**]. There will be no residual detrimental effect on Chippenham Hall Registered Park and Garden as a result of the proposals for W12.

Ref.	Current proposals as detailed in OLEMP [REP5-014]	Residual effects	Further mitigation required [REP4-149] and LIR [REP1-024]	Applicants mitigation under discussion/or not yet shown on EnvM –[AS-324] and/or [AS-321]	Residual effects if the Council's mitigation is implemented in full	Applicant's response at Deadline 8
	New woodland, hedgerow, mixed scrub and rush pasture is also proposed along the northern edge of W10, to provide visual screening from the same road and reinforce the existing vegetation patterns. The Environmental Plan (sheet 12) shows a proposed hedgerow along the boundary with the A11, management of the parcel for pollinators and conservation grazing.	some of the adverse visual effects from La Hogue Road and Farm, this would not be appropriate within the historic and characteristically open landscape. The **changes in character** to La Hogue Road as a result of enabling road works would constitute residual adverse effects that have not been adequately assessed. **Loss of** the **continuity** of the **roadside hedge** along La Hogue Road (passing places) and towards parcel W09 and W11 (internal access roads).	Replacement hedging should be provided behind passing places to restore the continuity of this feature.			
W15	The solar panels have been offset from the watercourse, along with the retention of the riverside trees and	With the current proposals **W15** would be likely to be **remain visible form the A11**	Mitigation around perimeter needs to be more robust.	This has been discussed with the applicant, but insufficient progress was made.	Residual visual effects of the parcel would be reduced to close to zero over the medium to long-term.	The OLEMP **REP7-015**] has been reviewed to reflect the proposals now shown on the Environmental

Ref.	Current proposals as detailed in OLEMP [REP5-014]	Residual effects	Further mitigation required [REP4-149] and LIR [REP1-024]	Applicants mitigation under discussion/or not yet shown on EnvM –[AS-324] and/or [AS-321]	Residual effects if the Council's mitigation is implemented in full	Applicant's response at Deadline 8
	vegetation and road networks. New woodland is proposed around the perimeter of the parcels to screen the Scheme, as well as to soften views of the A11 from Kennett and increase the vegetation.	through gaps in the roadside vegetation. There may be **views onto the solar farm from Dane Hill Cottages** (which was not assessed in detail).	The offset from the watercourse needs to be clarified, Riparian vegetation should be strengthened. Along the boundaries where no woodland or hedge is currently proposed further planting proposals are required.			Masterplan for W15 **REP7-054**].
W17	Siting the primary construction compound and the BESS and substation 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	The photomontage of VP33 [APP-229] suggests that some of the built structures would be breaking the skyline and would be visible, even at year 15, **adversely affecting views from La Hogue Road**, including the Farm Shop entrance. **Tree loss:** While not shown on the Environmental Plan, the AIA [REP5-	Without prejudice, the built structures should be designed and sited, as far as possible, so that do not break the skyline. Justification should be provided why these trees need to be removed. Any Category A/B trees or Veteran trees that may be surveyed at a later stage should be retained.	This has been discussed with the Applicant. However, no further information is expected to come forward prior to the detailed design stage post determination. The Councils have raised concerns with regards to insufficient arboricultural and hedgerow information on multiple occasions.	The residual effects would be minimised. However, detrimental residual effects on the historic landscape and the setting of the Chippenham Registered Park and Garden remain.	Further detail has been added to the OLEMP [**REP7-015**] and Environmental Masterplan [**REP7-054**] to explain how existing vegetation will be strengthened through planting to reinforce visual screening and enclosure.

Ref.	Current proposals as detailed in OLEMP [REP5-014]	Residual effects	Further mitigation required [REP4-149] and LIR [REP1-024]	Applicants mitigation under discussion/or not yet shown on EnvM –[AS-324] and/or [AS-321]	Residual effects if the Council's mitigation is implemented in full	Applicant's response at Deadline 8
	overall massing of the structures;	052/053] show several trees (including some that look very mature) as earmarked to be removed from the existing hedgerow between W17 and W08. These trees have not yet been accurately assessed.				