

RULE 17 REQUEST FOR INFORMATION

19TH JUNE 2025

ERYC RESPONSES

QUESTION 17.13

Onshore Historic Environment – nighttime visualisation

Provide a view on the information contained in the Nighttime Lighting Visualisation Technical Note [REP6-054]. If you have outstanding concerns regarding the impacts from lighting on the scheduled monument nearby to Butt Farm, set out what these are and how they could be addressed. Do you consider that the proposed lighting levels would affect the level of harm you have identified to the nearby scheduled monument?

ERYC RESPONSE

These comments are based on a number of assumptions such as:

- (i) The methodology set out in section 3 represents the best practice for producing these visualisations- which would seem logical and reasonable to assume
- (ii) That the level and frequency of activity modelled in section 2 are correct- and that the height and location of the lighting is correct.

The visualisations seem to demonstrate that at Scenario O (no lighting, year 1) the converter station would appear as a relatively looming element silhouetted against the darkness. The impact of the lights shown in Figure 1c would be to illuminate more of the buildings, and to reinforce a sense of activity on the site. This would result in a marginally greater impact on how views out from the Scheduled Monument is experienced, by reinforcing the sense of intervention in to what would have previously been an open landscape. This impact would reduce down by year 10 (Figure 1d), with some light permeating through the screen planting, and some elements of the converter station still being visible above the planting. The presence of the converter station would still be experienced in this scenario, but it would be less obvious and stark than in Figures 1b and 1c.

In terms of the assessment of harm, this stems from the principle of its construction, and the impact that the creation of a large imposing structure would have on the wider open setting in which the Scheduled Monument is experienced, which contributes to an appreciation of its significance. This impact is exacerbated by the introduction of all the associated paraphernalia, such as lighting, which simply add to its presence and the scale of its intervention into the landscape. However, the impact of these additional paraphernalia is inherently tied up in the scale of the converter station itself, and is an intrinsic and indivisible element of the project. The introduction of lighting does therefore result in a small level of harm in its own right, but this is only a small element of the wider harm caused by the project as a whole.

The impact of the lighting could only really be mitigated by limiting its amount, and by limiting the amount of time that it is turned on. It is noted in the supporting report that the applicant has sought to do this to a greater degree, but stating that visits will generally be carried out during daylight hours, that the lighting will be on sensors and programmed to switch off after a period of no activity and noting that the extent of lighting for any visit in the hours of darkness is therefore likely to involve the sequential turning on of areas of lights, as opposed to their turning on across the full site. As such, given that it seems logical to accept that some lighting will be needed, it is not clear that the impact of the lighting could be further reduced- unless it was felt appropriate to control the number and length of evening visits to the site per year at a capped amount. Although it is not sure how this could be achieved without also removing the ability of the company to ensure the continued running of the site in unexpected circumstances.

So in short, the answer to question 17.13 is that the lighting itself would have a small additional negative impact on the wider setting of the Scheduled Monument. This is considered to form part of the wider, and greater, impact that is inherently caused by the converter station. The lighting in isolation therefore does not meaningfully increase the harm caused by the wider development to the significance of the heritage asset, which would remain less than substantial. In terms of how this impact can be addressed, it is not clear that there are further mitigation measures that could be implemented, unless the quantum and length of visit could be capped or controlled as part of any DCO.

QUESTION 17.21

Tourism effects

Provide your views on the updated ES Chapter 29 – Tourism [REP6-033]. Do you agree with the updated significance of effects assessment for tourism assets (Impact 2) with particular regard to the change of landscape and visual impacts during operation for Butt Farm Caravans, Campsite and Glamping and the additional consideration of noise impacts during construction for Butt Farm Caravans, Campsite and Glamping and Strawberry Fields Holiday Park? If not, explain your concerns and how you would wish to see them addressed

ERYC RESPONSE

We agree with the updated significance of effects assessment for tourism assets (Impact 2) with particular regard to the change of landscape and visual impacts during operation for Butt Farm Caravans, Campsite and Glamping and the additional consideration of noise impacts during construction for Butt Farm Caravans, Campsite and Glamping and Strawberry Fields Holiday Park. However the businesses operating models are individual to them. Small businesses are very sensitive to change so what might be deemed a minor issue from an external perspective could actually have a very detrimental effect . Therefore careful consideration should be given to any extraordinary impact that the business might identify / encounter as a result of the construction and ongoing operation of the development. It would be advisable to review all mitigation proposals and work closely with the business to provide the best solution possible.

QUESTION 17.17

Landscape and Visual Amenity – Impacts on Ancient Woodland

What ‘constraints’ could lead to the need to use depths less than 5 metres below ancient woodland for trenchless crossing techniques and how likely is this? What would happen if constraints suggested shallower depths were required, but roots for ancient woodland were present at similar depths – how would protection of ancient woodland be ensured in this scenario?

ERYC RESPONSE

We are unable to provide details on the nature of the constraints that could lead to depths of less than 5m and would ask the applicant to provide details based on preliminary investigations and desk based literature.

The trees forming the canopy cover for Bentley Moor Wood LWS are predominantly sycamore and the result of semi-natural regeneration. There is significant value in the upper soil and ground layers of ancient woodland and impacts on these high value ecological assets would still be avoided at shallower depths. Impacts to veteran and notable trees would be of most concern should shallower depths be used.

The following commitment could be secured to ensure the protection of the ancient woodland:

Should constraints suggest shallower depths than 5m were required then the trenchless crossing corridor route would be sited to avoid impacts within and below the identified root protection areas of any veteran or notable trees.