The Planning Inspectorate
Yr Arolygiaeth Gynllunio

SCOPING OPINION:

Proposed Steeple Renewables Project

Case Reference: EN010163

Adopted by the Planning Inspectorate (on behalf of the Secretary of State) pursuant to Regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

03 June 2024

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1. INTRODUCTION

1.0.1 On 19 April 2024, the Planning Inspectorate (the Inspectorate) received an application for a Scoping Opinion from Renewable Energy Solutions (RES) Limited (the Applicant) under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) for the proposed Steeple Renewables Project (the Proposed Development). The Applicant notified the Secretary of State (SoS) under Regulation 8(1)(b) of those regulations that they propose to provide an Environmental Statement (ES) in respect of the Proposed Development and by virtue of Regulation 6(2)(a), the Proposed Development is 'EIA development'.

1.0.2 The Applicant provided the necessary information to inform a request under EIA Regulation 10(3) in the form of a Scoping Report, available from:

http://infrastructure.planninginspectorate.gov.uk/document/EN010163-000015

http://infrastructure.planninginspectorate.gov.uk/document/EN010163-000016

http://infrastructure.planninginspectorate.gov.uk/document/EN010163-000017

http://infrastructure.planninginspectorate.gov.uk/document/EN010163-000018

1.0.3 This document is the Scoping Opinion (the Opinion) adopted by the Inspectorate on behalf of the SoS. This Opinion is made on the basis of the information provided in the Scoping Report, reflecting the Proposed Development as currently described by the Applicant. This Opinion should be read in conjunction with the Applicant's Scoping Report.

1.0.4 The Inspectorate has set out in the following sections of this Opinion where it has / has not agreed to scope out certain aspects / matters on the basis of the information provided as part of the Scoping Report. The Inspectorate is content that the receipt of this Scoping Opinion should not prevent the Applicant from subsequently agreeing with the relevant consultation bodies to scope such aspects / matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects / matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.

1.0.5 Before adopting this Opinion, the Inspectorate has consulted the 'consultation bodies' listed in Appendix 1 in accordance with EIA Regulation 10(6). A list of those consultation bodies who replied within the statutory timeframe (along with copies of their comments) is provided in Appendix 2. These comments have been taken into account in the preparation of this Opinion.

1.0.6 The Inspectorate has published a series of advice notes on the 'Find a National Infrastructure Project' on the gov.uk website, including Advice Note 7:

Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping (AN7). AN7 and its annexes provide guidance on EIA processes during the pre-application stages and advice to support applicants in the preparation of their ES.

1.0.7 Applicants should have particular regard to the standing advice in AN7, alongside other advice notes on the Planning Act 2008 (PA2008) process, available from:

https://www.gov.uk/government/collections/national-infrastructure-planning-advice-notes

1.0.8 This Opinion should not be construed as implying that the Inspectorate agrees with the information or comments provided by the Applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this Opinion are without prejudice to any later decisions taken (e.g. on formal submission of the application) that any development identified by the Applicant is necessarily to be treated as part of a Nationally Significant Infrastructure Project (NSIP) or Associated Development or development that does not require development consent.

2. OVERARCHING COMMENTS

2.0 Description of the Proposed Development

(Scoping Report Section 2)

ID	Ref	Description	Inspectorate's comments
2.0.1	Paragraph 2.1.14	Substation, battery energy storage system (BESS) and associated infrastructure	The Scoping Report describes the area proposed for the BESS, substation, and associated infrastructure as being in the northern section of the eastern parcel of land, with the remaining area used for solar photovoltaic (PV). The Environmental Statement (ES) should provide the exact location and extent of these areas in the description, supported by figures.
2.0.2	Paragraph 3.1	Solar panels and set up	The ES should confirm the number, type and structural set up of the panels. This should include a description and reasoning for the spacing between panels to avoid ground shading effects and any buffers employed. The ES should describe and assess a worst-case scenario in the relevant aspect chapters in relation to the type of solar panels constructed with respect to, for example soil compaction, traffic and transport, landscape, and visual impact effects, etc.
2.0.3	Paragraphs 3.3.2 3.9.1	Switchgear	Details on the type of switchgear used for the inverters and at the substation should be included as part of the ES. Should a gas insulated switchgear (GIS) option be chosen for the inverters, the use of sulphur hexafluoride (SF6) should be avoided, if possible, in line with National Policy Statement (NPS) for Electricity Networks Infrastructure (EN-5).

ID	Ref	Description	Inspectorate's comments
2.0.4	Paragraph 3.10.1	Electricity export connection to the National Grid	The Scoping Report states that the electricity generated by the Proposed Development is expected to be exported via a connection from the Proposed Development to an existing substation at West Burton Power Station. The details of the connection to the substation at West Burton Power Station and the National Grid necessary for the Proposed Development should be identified as part of the assessment in the ES.
2.0.5	Section 3.11	Rochdale Envelope	The Inspectorate notes the Applicant's intention to use the 'Rochdale Envelope' approach. Where flexibility is sought, the ES should clearly set out and justify the maximum design parameters that would apply for each option assessed. The ES should explain how these parameters have been used to inform the assessment in the ES, recognising that this may differ depending on the assessment being undertaken, in assessing a reasonable worst-case scenario. The Applicant should make every attempt to narrow the range of options and explain clearly in the ES which elements of the Proposed Development are yet to be finalised and provide relevant justification. At the point an application is made the Inspectorate expects that the description of the Proposed Development will be sufficiently detailed to include the design, size, capacity, technology, and locations of the different elements of the Proposed Development. This should include the footprint, the heights and depths of the structures relevant to existing ground levels, as well as land-use requirements for all elements and phases of the Proposed Development. The project description should be supported as necessary by figures, cross-sections, and drawings which should be clearly referenced.

ID	Ref	Description	Inspectorate's comments
2.0.6	Paragraph 4.1.1	Construction and operation start dates	The Scoping Report states that the construction phase of the Proposed Development is anticipated to last up to two years, dependent on the final design and the findings of the access and traffic assessment. The ES should clearly explain the parameters used in the assessment including the likely construction and connection dates. If any uncertainty remains, the ES should explain how the future baseline has been defined for each aspect and how impacts have been predicted given any uncertainty around timing. A construction programme should be provided to ensure a clear understanding of assumptions made over construction impacts including cumulative impacts to ensure that the worst-case construction scenarios are assessed.
2.0.7	Paragraph 4.3.1	Construction compounds	The Scoping Report states that a main temporary construction compound is likely to be established close to the Proposed Development Site entrance with smaller temporary compounds located across the development as the Site is built out and that the locations of these temporary compounds are likely to move over the course of the construction phase as each section of the Proposed Development is built out. The number, location and maximum parameters of construction compounds should be identified in the ES to ensure where flexibility is sought that a worst-case assessment has been carried out.
2.0.8	Paragraph 4.6.1	Maintenance	Maintenance needs are described as minimal and restricted to vegetation management, equipment maintenance and servicing. The replacement of any damaged or failing panels should be considered in the assessment.

ID	Ref	Description	Inspectorate's comments
			The ES should describe the potential scope and duration of maintenance works required during the operation of the Proposed Development, including predicted vehicle movements and staffing numbers.

2.1 EIA Methodology and Scope of Assessment

(Scoping Report Section 6)

ID	Ref	Description	Inspectorate's comments
2.1.1	Table 1.1	Material assets	The Scoping Report does not consider that there are further material assets to those already addressed within other topics. The ES should clarify what material assets have been included within the scope of the assessment. Without this detail and supporting evidence, the Inspectorate is unable to agree that further material assets can be scoped out of the assessment.
2.1.2	Section 6.2	EIA methodology and evaluation of significance	The methodology for determination of likely significance of effects should be fully explained in the ES and should clearly define what effects are considered significant and explain how those conclusions have been reached. Where professional judgement has been relied on to determine the level of significance of effects and assess significance this should be fully justified within the ES.
2.1.3	Paragraph 6.3.4	Mitigation	Effort should be made to agree any proposed mitigation measures with the relevant consultation bodies, and it should be clear how these are secured through the DCO or other legal mechanism. Where any off-site mitigation is proposed, the additional area should be

ID	Ref	Description	Inspectorate's comments
			included in the red line boundary and assessed in the ES where significant effects are likely to occur.
2.1.4	Paragraphs 6.5.5 - 6.5.9	Cumulative effects – West Burton Site	The ES should consider the decommissioning of West Burton Site A in the cumulative assessment if there is potential for significant effects. The application for a 500MW BESS at West Burton Site B which is approved should also be considered as part of the cumulative assessment as there may be an overlap with the construction phases of the Proposed Development.
2.1.5	Paragraphs 6.6.5 - 6.5.10	List of developments	The Scoping Report states that the list of developments is to be reviewed as the EIA process continues. The ES should explain the methodology for defining the list of developments identified and justify the omission/inclusion of developments for cumulative assessment. This should be informed by appropriate consultation with the relevant bodies.
2.1.6	Paragraph 6.5.10	Study area – cumulative sites	The ES should fully justify the study area for cumulative sites with reference to relevant guidance and the likely extent of impacts. The ES should provide a clear justification for the extent of each Zone of Influence (ZoI) and how it captures the effects from the Proposed Development. The ES should include a figure depicting the location and extent of cumulative developments in relation to the Proposed Development. The ZoI should be agreed with the relevant statutory consultation bodies where possible as part of the discussions of the assessment methodologies. Evidence of agreement of these points should be provided in the ES. The Applicant should also consider an iterative cumulative assessment which considers additional schemes as they come

ID	Ref	Description	Inspectorate's comments
			forward. The Applicant's attention is drawn to the Inspectorate's 'Advice Note Seventeen: Cumulative effects assessment relevant to nationally significant infrastructure projects' in this regard.
2.1.7	Paragraphs 6.6.1 – 6.6.5	Assessment of options – development parameters	The Applicant should make every attempt to narrow the range of options and explain clearly in the ES which elements of the Proposed Development have yet to be finalised and provide the reasons. At the time of application, any Proposed Development parameters should not be so wide ranging as to represent effectively different developments. The development parameters should be clearly defined in the draft DCO and in the accompanying ES. The ES should identify the parameters that have been assumed as the worst-case scenario for each aspect scoped into the assessment and ensure that interactions between aspects have been taken into account where relevant to those scenarios.
2.1.8	Table 19.2	Major accidents and disasters	The Inspectorate considers that, for the avoidance of doubt, the risk of fire associated with battery storage facilities should be assessed in the ES and relevant mitigation, such as fire-fighting and containment measures, should be set out and secured in the Development Control Order (DCO), with reference to a Battery Safety Management Plan for example.
2.1.9	Table 19.2	Soil contamination	The Inspectorate considers that without a Phase 1 Contaminated Land Report / Preliminary Risk assessment it cannot be assumed that there is no soil contamination on the Proposed Development Site. Evidence of the absence of contaminants from a Phase 1 Contaminated Land Report should demonstrate the historical land use with respect to any known sources of contamination and that no further assessment is required before this matter can be scoped out.

ID	Ref	Description	Inspectorate's comments
2.1.10	Table 19.2	Human health	The possible effect on human health from the Proposed Development will be considered within the ES but not in its own standalone chapter. The Scoping Report states that it would be considered in the noise and air quality assessments. Consideration should be given to direct and indirect impacts on human health receptors. The ES should clearly signpost where impacts relating to human health have been considered in the relevant technical chapters. The ES should ensure sufficient clarification and cross referencing along with consideration of any potential in-combination effects on human health. The assessment should be informed by relevant guidance such as the Institute of Environmental Management and Assessment (IEMA) 2022 guidance 'Determining Significance for Human Health in Environmental Impact Assessment'.
2.1.11	n/a	Cumulative effects – interactions and assessment years	The ES should assess interactions with other developments and the potential for intra-cumulative effects that may occur as a result of proposed mitigation for a specific environmental aspect or matter, e.g. landscape and visual mitigation planting on buried archaeological assets. The ES should set out the worst–case assessment years that have been assumed for the assessment. Where there is potential for construction activities to occur across several sites simultaneously this should be considered to ensure a worst-case assessment is provided. Where different aspect assessments use different assessment years, the reasons for the selection of assessment years should be clearly explained in each case, with reference to the relevant guidance.

ID	Ref	Description	Inspectorate's comments
2.1.12	n/a	Scoping table	The Inspectorate recommends the use of a table in the ES to set out key changes in parameters / options of the Proposed Development or commitments to mitigation in the Scoping Report to those presented in the ES. It is also recommended that a table is provided demonstrating how the matters raised in the Scoping Opinion have been addressed in the ES and/or associated documents.
2.1.13	n/a	Transboundary effects	The Inspectorate on behalf of the SoS has considered the Proposed Development and concludes that the Proposed Development is unlikely to have a significant effect either alone or cumulatively on the environment in a European Economic Area State. In reaching this conclusion the Inspectorate has identified and considered the Proposed Development's likely impacts including consideration of potential pathways and the extent, magnitude, probability, duration, frequency, and reversibility of the impacts. The Inspectorate considers that the likelihood of transboundary effects resulting from the Proposed Development is so low that it does not warrant the issue of a detailed transboundary screening. However, this position will remain under review and will have regard to any new or materially different information coming to light which may alter that decision. Note: The SoS' duty under Regulation 32 of the 2017 EIA Regulations continues throughout the application process. The Inspectorate's screening of transboundary issues is based on the relevant considerations specified in the Annex to its Advice Note Twelve, links for which can be found in paragraph 1.0.7 above.

3. ENVIRONMENTAL ASPECT COMMENTS

3.1 Landscape and Visual Impact and Residential Amenity

(Scoping Report Section 7)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.1.1	n/a	n/a	No matters have been proposed to be scoped out of the assessment.

ID	Ref	Description	Inspectorate's comments
3.1.2	Paragraphs 3.6.2 8.6.2	Lighting	The ES should explain the construction and operational lighting strategy and how the lighting design has been developed to minimise light spill and the effect of intermittent lighting on human and ecological receptors. The ES should provide an assessment of lighting effects during construction and decommissioning, including a night-time assessment, or the information required to demonstrate the absence of a likely significant effect (LSE).
3.1.3	Paragraph 7.4.12 Table 7.1	Study Area - Screened Zone of Theoretical Visibility (SZTV)	The Applicant should demonstrate how their approach to using a SZTV complies with the Landscape Institute's guidance on establishing a ZTV for the landscape and visual impact assessment (LVIA). The Landscape Institute's ZTV approach treats the world as 'bare earth' and does not take account of potential screening by vegetation or buildings.
3.1.4	Paragraph 7.4.20	Photomontages	The Inspectorate considers that 3D photomontages based on current Landscape Institute best practice guidance should be provided with the ES to demonstrate the potential visual impact of the Proposed

ID	Ref	Description	Inspectorate's comments
			Development on receptors from chosen viewpoints, and to show this during in Year 1 and Year 15 as proposed, in winter and summer periods as required, with and without the Proposed Development. Effort should be made to agree the visual receptors, viewpoint locations and viewpoint heights with relevant consultation bodies.
3.1.5	Paragraphs 7.6.2 – 7.6.3	Mitigation planting	The ES should clearly present any assumptions made with regards to the height that the proposed mitigation planting would have reached by the assessment years, with reference to relevant guidance to ensure that these are based on accepted growth rates for the plant species concerned, for the purposes of generating photomontages and reaching the assessment conclusions.
3.1.6	n/a	Impacts – cross reference to other aspects	The LVIA should cross refer to other relevant assessments and sensitive receptors such as cultural heritage.
3.1.7	n/a	Transient receptors	The ES should consider the potential for visual effects on transient receptors such as users of cars, bicycles, buses, or trains.

3.2 Ecology & Biodiversity

(Scoping Report Section 8)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.2.1	Paragraph 8.2.52 Table 19.1	Dormouse survey and assessment	The Scoping Report states that the Proposed Development Site has poor habitat connectivity to known dormouse populations. Table 8B.1 of the Habitat Survey (Appendix 8B) indicates that woodlands (priority and non-priority) and 88 km of hedgerows are within and/or adjacent to the Proposed Development Site. The Inspectorate would expect to see this matter considered as part of the assessment or evidence provided to conclude that this species is absent from the Proposed Development Site. This could include information confirming that no suitable habitat is present through relevant habitat surveys or further evidence to support the assertion that there is poor habitat connectivity to existing dormouse populations by identifying the location of the nearest populations and providing confirmation of their absence in local records. Effort should be made to gain agreement on this matter with relevant consultation bodies.

ID	Ref	Description	Inspectorate's comments
3.2.2	Paragraph 8.2.4 Table 8.1 Table 8.A.1	Study Area – Zone of Influence (ZoI)	The ES should provide information explaining how the relevant ZoI for each receptor has been determined for the assessment. The ES should ensure the study area reflects the project's ZoI rather than being based on a fixed distance. Effort should be made to agree the study area(s) with relevant consultation bodies and with reference to relevant guidance.

ID	Ref	Description	Inspectorate's comments
3.2.3	Paragraph 8.2.4 Table 8.1	Bats – study area	The ES should justify how this search area applies to all potentially affected bat species and make effort to agree the study area and approach to assessment with relevant consultation bodies.
3.2.4	Table 8.1	Bat – activity	The ES should justify why the Applicant concludes that significant effects are unlikely for bats beyond the proposed Order Limits. Agreement on the study area should be sought from NE and relevant consultation bodies. The ES should consider the potential for impacts on international sites designated for bats within a 30km study area or provide evidence to demonstrate the absence of a LSE.
3.2.5	Paragraphs 8.2.16 8.3.34	Great crested newts (GCN)	The ES should include information to demonstrate whether the Proposed Development is located within a risk zone for GCN and whether the Proposed Development is likely to have a significant effect on GCN. If the Applicant intends to obtain a licence through the Natural England (NE) District Level Licensing (DLL) scheme for GCN any licence requirements should be discussed with NE and agreed prior to completion of the ES, if possible.
3.2.6	Paragraph 8.2.53	Wintering bird surveys post March 2024	Dependent on the timescales between scoping and submission of the ES, the Applicant should consider whether surveys are current, and should agree the scope and timing of surveys with relevant consultation bodies.
3.2.7	Paragraph 8.3.6 Appendix 8C	Functionally linked land - European sites /internationally designated sites	The breeding and wintering bird surveys undertaken in 2023/24 have not identified any significant activity at the Proposed Development Site from qualifying bird species of the identified European sites.

ID	Ref	Description	Inspectorate's comments
	Appendix 8D		The initial assessment is that the Proposed Development Site is not functionally linked to the internationally designated sites and the Applicant considers that it is highly unlikely that any significant adverse effects will occur indirectly to statutory sites at any phase of the Proposed Development. The ES should provide evidence to demonstrate that no potential significant effects are likely for any qualifying bird species or key features of internationally designated/European sites through functionally linked land.
3.2.8	Paragraphs 8.3.3 8.3.28	Disturbance to breeding birds during construction	The ES should assess disturbance impacts to bird species breeding in field boundaries during construction and explain how existing hedgerows will be retained. The ES should outline the measures to be taken to mitigate disturbance impacts in any removal of existing field boundary habitats.
3.2.9	Paragraphs 8.3.14 8.3.45 Appendix 8B	Veteran trees	Veteran trees are identified in the Habitat Survey (Table 8B.1, Appendix 8B) under the heading of 'potential irreplaceable habitats'. The ES should identify and assess impacts to veteran trees where significant effects are likely to occur. Where mitigation measures are required, the ES should describe these measures and signpost where they are secured through the DCO.
3.2.10	Paragraphs 8.3.26 8.6.2	Lighting disturbance - mitigation	The ES should assess impacts on ecological receptors from lighting where significant effects are likely to occur, and demonstrate measures taken to avoid disruption of ecological corridors such as hedgerows that provide flight-lines for bats. The ES should clearly explain how the measures will avoid or limit lighting impacts on ecological receptors.

ID	Ref	Description	Inspectorate's comments
3.2.11	Section 8.6 Appendix 8D	Potential mitigation and enhancement measures – landscape and ecological management	The ES should be supported by a draft landscape and ecological management and monitoring plan and set out how the Applicant intends to deliver biodiversity enhancements. The ES should distinguish between measures intended to avoid or reduce the potential for LSEs, and those which have been identified for enhancement only. The ES should state how these measures will be secured through the DCO.
3.2.12	Paragraph 8.6.2	Mitigation - vegetation disturbance	The ES should explain how phasing and methods of vegetation clearance will avoid disturbance of protected species. Relevant measures should be secured by a DCO requirement.
3.2.13	Paragraph 8.6.2	Mitigation - invasive non-native species	The Inspectorate notes the potential for impacts resulting from the spread of invasive species during construction and decommissioning of the Proposed Development. Any necessary eradication and/or control measures should be detailed in the ES and any LSEs assessed.
3.2.14	Paragraph 9.6.5	Horizontal Directional Drilling (HDD) – impacts on aquatic species	Trenchless HDD methods are likely to be used for laying any cables beneath existing watercourses. This has potential to cause impacts on aquatic species due to breakout from drilling fluids and vibration within the riverbed. The Inspectorate notes that the Applicant proposes to submit a drilling fluid breakout plan. The ES should include a description of the sensitivity of relevant watercourses and any seasonal constraints on such crossings, assessing LSEs on riverine species where they are likely to occur from such impacts. Potential impacts from noise, vibration, lighting or sediment breakout from the Proposed Development on aquatic species should be assessed.

ID	Ref	Description	Inspectorate's comments
3.2.15	Paragraph 9.6.4	New bridges or culverts	The Scoping Report states that any new bridges and culverts will be designed to ensure flow capacity is retained and access to watercourse for maintenance is retained. No information is provided in relation to the scale and dimensions of these structures or detail of the nature of any associated construction works. The ES should describe where bridge/ culvert structures are proposed and demonstrate that there is sufficient detail regarding the design as to inform a meaningful assessment of effects on watercourse hydraulics and ecology.
3.2.16	Paragraph 15.3.4	Dust impacts on receptors	The ES should include an assessment of whether the Proposed Development would result in LSE on ecology as a result of dust emissions to air during construction and decommissioning, or demonstrate agreement with the relevant consultation bodies and the absence of LSE.
3.2.17	n/a	Security fencing	Security fencing is proposed around the operational areas of the site. The ES should assess any impacts associated with the security fencing on ecological receptors where significant effects are likely to occur. Any necessary mitigation measures, such as mammal gates, should be described.
3.2.18	n/a	Confidential Annexes	Public bodies have a responsibility to avoid releasing environmental information that could bring about harm to sensitive or vulnerable ecological features. Specific survey and assessment data relating to the presence and locations of species such as badgers, rare birds and plants that could be subject to disturbance, damage, persecution, or commercial exploitation resulting from publication of the information, should be provided in the ES as a confidential annex.

ID	Ref	Description	Inspectorate's comments
			All other assessment information should be included in an ES chapter, as normal, with a placeholder explaining that a confidential annex has been submitted to the Inspectorate and may be made available subject to request.

3.3 Hydrology, Hydrogeology, Flood Risk and Drainage

(Scoping Report Section 9)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.3.1	Paragraphs 9.3.7 9.3.22	Impacts on surface water resources due to abstraction during construction and decommissioning	No significant surface water use demand is anticipated during the construction and decommissioning phases by the Applicant. The Inspectorate agrees that this matter can be scoped out subject to confirmation on the need for and scale of any abstraction within the project description of the ES.
3.3.2	Paragraphs 9.3.8 9.3.22	Hydrology impacts during construction and decommissioning on Clarborough Tunnel Site of Special Scientific Interest (SSSI)	The Inspectorate agrees that this matter can be scoped out provided that sufficient baseline evidence can show that there will be no potential hydrological impact on the SSSI.
3.3.3	Paragraphs 9.3.9 9.3.22	Impact of pollutant release to groundwater during construction and decommissioning	The Inspectorate agrees that this matter can be scoped out subject to further information provided with the ES to demonstrate that there is an absence of contaminated land within the Proposed Development Site (such as a Phase 1 Contaminated Land Report) and there is no likelihood of any potential impact pathway being created through construction or decommissioning works.
3.3.4	Paragraphs 9.3.10 9.3.22	Impacts on groundwater resources due to abstraction during construction and decommissioning	The Inspectorate agrees that this matter can be scoped out from the assessment subject to information being provided with the ES to demonstrate that abstraction during construction and decommissioning is not likely to give rise to LSEs on groundwater resources.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.3.5	Paragraphs 9.3.11 9.3.22	Impact of construction works on groundwater flow	Given the nature of the underlying geology (low permeability mudstone), significant disruption to subsurface water flow routes during excavation works are considered unlikely. The Inspectorate agrees that this matter can be scoped out subject to further information being provided in the ES to confirm that any construction works will not give rise to any LSEs.
3.3.6	Paragraph 9.3.14	Impact of the development on surface water resources during the operational phase	The Applicant considers that the Proposed Development will require minimal water resource during the operational phase. The Inspectorate considers that, based on the operational characteristics of the Proposed Development, any potential significant effects are unlikely with respect to use of surface water resources and agrees that this matter can be scoped out.
3.3.7	Paragraph 9.3.15	Impact on groundwater quality during the operational phase	The Scoping Report states that there is the potential for accidental releases of chemicals to adversely impact any underlying groundwater bodies primarily from the use of cooling chemicals and the potential for release of firefighting runoff in the BESS area. The Scoping Report notes that this area is located above the Mercia Mudstone (Secondary B aquifer) which limits the sensitivity of the receptor, and the Proposed Development would have a leak detection system and alarm fitted to the cooling system and the drainage strategy for the BESS area will include provision for the retention of any contaminated fire-fighting runoff. Based on the above information the Inspectorate is of the opinion that this matter can be scoped out of the assessment.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.3.8	Paragraph 9.3.16	Impact of the development on groundwater resources during the operational phase	The Scoping Report states that the Proposed Development will require minimal water resource during the operational phase. The Inspectorate agrees that this matter can be scoped out on this basis.
3.3.9	Paragraph 9.3.17	Impact of subsurface structures on groundwater flow	Given the nature of the underlying geology (low permeability mudstone), significant long-term disruption to subsurface water flow routes associated with foundations, piles or underground pipes is considered unlikely by the Applicant. The Inspectorate agrees that this matter can be scoped out, subject to information being provided with the ES that demonstrates that the foundations, piles or underground pipes will not impact on groundwater flow.

ID	Ref	Description	Inspectorate's comments
3.3.10	Paragraphs 2.3.3 4.3.1	Construction compounds	The Applicant should ensure that an assessment of the potential impacts from construction compounds on the water environment receptors is included in the ES. The ES should also explain how the location of construction compounds, including access, has been considered to reduce potential effects on the water environment and how any mitigation is secured through the DCO.
3.3.11	Section 3.1 Paragraph 3.2.1 Section 4.1 Paragraphs 9.2.10 –	Effect of PV frames and panels/modules	The Scoping Report states that the solar PV panels will be mounted on a rack supported by galvanised steel poles driven into the ground. The Scoping Report does not indicate the number of modules, however given the indicative size of the area of solar panels and associated development in Figure 1.2, it is likely that a large number of steel poles will be required. This aspect chapter should consider how the steel poles driven into the ground across the developable

ID	Ref	Description	Inspectorate's comments
	9.2.12		area for the panels may impact the drainage patterns within the site, in addition to any changes in surface water run off from the panels.
3.3.12	Paragraphs 9.2.10 9.4.3 9.6.8	Baseline data – Flood zones	The ES should differentiate between Flood Zones 3a and 3b where appropriate within the study area to determine which parts of the Proposed Development's Site are located within areas considered as 'high probability of flooding' and 'functional floodplain'.
3.3.13	Paragraphs 9.2.15 9.3.2	Waterbodies	Watercourses classified under the Water Framework Directive (WFD), (e.g., the Catchwater Drain, the River Trent and the Wheatley Beck), are within and/or adjacent to the Proposed Development Site boundary. These are considered by the Applicant to be particularly sensitive to any water quality impacts. The Proposed Development Site's location within a Drinking Water Protected Area also means that it is sensitive to water pollution. A proposed WFD Screening assessment is intended to support the assessment of water quality impacts on surface watercourses. The Inspectorate advises that the ES should include an assessment of the potential impact of the Proposed Development on WFD waterbodies from construction and decommissioning.
3.3.14	Paragraph 9.4.2	Zone of influence (ZoI) – surface water and groundwater impacts	The Inspectorate considers that the ES should clearly define the study area based on the ZoI, the hydrology of the site and potential for significant effects, following consultation with relevant consultation bodies.
3.3.15	Paragraph 9.4.6	Mitigation - Sustainable Drainage Systems (SuDs)	The Inspectorate notes the proposed use of SuDs. The design of such mitigation measures should be informed by relevant and up to date climate change allowances for the lifetime of the Proposed Development.

ID	Ref	Description	Inspectorate's comments
3.3.16	Paragraph 9.6.5	Mitigation and enhancement measures - HDD	The ES should assess impacts from any use of trenchless HDD on receptors which are likely to result in significant effects. Should drilling fluid be used in construction, a breakout plan should be submitted and secured in the DCO application.
3.3.17	Paragraphs 9.6.8 9.6.11	Mitigation – floodplain compensation	The Scoping Report states that the Proposed Development will be designed to remain operational during a fluvial / tidal flood event. Where development is to be located within Flood Zone 3, then an assessment of the floodplain loss should be made and floodplain compensation should be provided. This should include consideration of the cumulative losses from solar panel mountings. If any essential infrastructure is to be located within Flood Zone 3a this should be designed and constructed to remain operational and safe in times of flood and throughout the lifetime of the Proposed Development taking account of climate change.
3.3.18	Paragraph 9.6.9	Mitigation – run off	A drainage strategy will be implemented, promoting infiltration where possible and using SuDS to provide attenuation of runoff. The possibility for enhancement by designing SuDS features with additional capacity to provide a reduction in flood risk downstream, with consideration given to the area of existing flood risk in the village of Sturton le Steeple is noted and should be consulted on with relevant consultation bodies.
3.3.19	n/a	Mitigation – routine emissions of chemicals and sediment	The ES should explain why the operation of the Proposed Development would not give rise to routine emissions of chemicals (ie that panels are effectively inert) or sediment, and how emergency releases would be managed within an Operation Environment Management Plan (OEMP) and/ or Soil Management Plan and Battery Safety Management Plan.

ID	Ref	Description	Inspectorate's comments
3.3.20	Paragraphs 8.3.12 8.3.43 8.3.50 16.3.1	Agricultural land – changes in land management and water pollution	It is considered in the Scoping Report that changes in operational land management and reduction of agricultural chemical use and run-off into watercourses and waterbodies will be of benefit to the non-statutory designated sites hydrologically connected to the Site and species such as aquatic invertebrates, fish, otters, and water voles. Mitigation measures relating to land management should be contained in the OEMP or equivalent plan, and the drainage strategy.
3.3.21	n/a	Mitigation - decommissioning	The Scoping Report states that effects from decommissioning on water environment receptors, excluding water quality effects from increased siltation and pollution events, are assumed to be no worse than effects during construction. The Inspectorate advises that a Decommissioning Environmental Management Plan (DEMP) is produced and implemented to manage decommissioning activities and relevant measures are agreed with the Local Planning Authorities.
3.3.22	n/a	Mitigation – flood risk	Design and mitigation measures for flood risk should be agreed with the EA, Lead Local Flood Authority (LLFA) and relevant Internal Drainage Board (IDB). Cross-reference should be made to relevant information contained within the FRA, as appropriate.

3.4 Cultural Heritage

(Scoping Report Section 10)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.4.1	Table 19.1	An assessment of designated heritage assets (comprising scheduled monuments, listed	The Inspectorate agrees that this matter can be scoped out as there is unlikely to be LSEs on designated heritage assets beyond 3km from the Proposed Development Site, provided that evidence that this

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		buildings, conservation areas, registered parks and gardens, registered battlefields and World Heritage Sites) beyond 3km from the Site	matter has been consulted on with relevant consultation bodies is shown in the ES.

ID	Ref	Description	Inspectorate's comments
3.4.2	Paragraph 10.2.1	Study Area	The Scoping Report states that a programme of geophysical survey, with further work to follow as required will be undertaken to support the Cultural Heritage Assessment. The Applicant should provide evidence of any agreement from the relevant consultation bodies regarding the extent, nature and timing of field investigations. It should be clear how the approach taken ensures that any heritage assets and their associated settings with long views towards or out from the Proposed Development Site have been identified and considered. Effort should be made to agree the approach and sensitive receptors with relevant consultation bodies. The study areas and locations of the heritage assets should be depicted on supporting plan/s.
3.4.3	Paragraph 10.4.11	Likely significant effects – decommissioning	As there is potential for ground disturbance during decommissioning and effects are likely to be similar to those experienced during construction, the Inspectorate is of the opinion that an assessment of the impact of the Proposed Development on known and unknown archaeological remains during decommissioning should be included in the ES.

ID	Ref	Description	Inspectorate's comments
3.4.4	Paragraphs 10.4.4 10.5.12 – 10.5.15	Methodology - archaeology	The ES should clarify the methodology for determining potentially unknown buried archaeological remains within the Proposed Development Site. The ES should consider the need for intrusive evaluation to provide information required to assess the LSEs and make effort to agree the need for intrusive investigations with relevant consultation bodies. Where required, to fully understand the likely effects of the Proposed Development on any archaeology and identify any mitigation necessary to address any LSEs, intrusive investigations should be completed prior to submission of the DCO application where possible. The Applicant's attention is directed to the consultation responses from Lincolnshire and Nottinghamshire County Councils, Bassetlaw District Council, and Historic England in Appendix 2 of this Scoping Opinion on this matter.
3.4.5	Section 10.7	Potential mitigation	The ES should provide details of the surveys used to inform the assessment including any intrusive site surveys undertaken. The ES should explain how such surveys inform the proposed mitigation strategy. The Applicant's attention is directed to the consultation responses on this matter from Bassetlaw District Council and Historic England with respect to the scheduled monument (Segulocum Roman town), and from Lincolnshire and Nottinghamshire County Councils in Appendix 2 of this Scoping Opinion.

3.5 Socio-Economics

(Scoping Report Section 11)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.5.1	7.2.2	Recreational routes / Public Rights of Way (PRoWs)	An assessment of the impact on tourism and the use of recreational routes including PRoWs should be considered as part of the wider socio-economic aspect in the ES.
3.5.2	Paragraph 11.4.8 Table 19.1	Consideration of potential effects on housing supply	The Applicant intends to accommodate any construction or decommissioning workers who reside from outside of the local area in Serviced and/or Non-Services Accommodation as opposed to residential dwellings (rental or otherwise). The Inspectorate agrees that this matter can be scoped out from the assessment provided that the availability of local accommodation and services will not be impacted, and there is evidence that this approach has been agreed with the relevant consultation bodies. The estimated number of potential workers for the construction and decommissioning phases should be provided in the ES.

ID	Ref	Description	Inspectorate's comments
3.5.3	Section 11.3	Employment – all phases	The Inspectorate advises that estimates should be provided in the ES of the number and types of jobs created and they should be considered in the context of the available workforce in the area during each phase of the Proposed Development.

3.6 Noise and Vibration

(Scoping Report Section 12)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.6.1	n/a	n/a	No matters have been proposed to be scoped out of the assessment

ID	Ref		Inspectorate's comments
3.6.2	Section 12.2	Receptors – cross referencing	The Inspectorate considers that noise and vibration may also have potential to lead to adverse effects on landscape and visual receptors, in terms of tranquillity for example, and on cultural heritage assets. Potential adverse effects on landscape and cultural heritage should be cross referenced in the relevant aspect chapters in the ES. The ES should also consider whether any ecological receptors require consideration in respect of noise and vibration related impacts. The Applicant should seek agreement from the relevant consultation bodies on any ecological receptors and cross refer to relevant chapters within the ES.
3.6.3	Section 12.2	Study Area	The ES should explain how the study area and sensitive receptors have been selected with reference to the extent of likely impacts. The ES should provide a plan showing the location of all sensitive receptors identified for assessment. Effort should be made to agree the study area and approach to the assessment with relevant consultation bodies.
3.6.4	Paragraph 12.3.3	Traffic noise and vibration	Traffic noise and vibration should be considered alone and cumulatively with other noise emissions from the Proposed Development during all phases of the Proposed Development but

ID	Ref		Inspectorate's comments
			particularly during the construction and decommissioning phases as part of the assessment. The ES should provide information on trip generation, traffic routing, noise emissions and distances from receptors including any measures that are to be secured through the DCO to avoid or reduce LSEs for all phases.
3.6.5	Paragraph 12.3.3	Noise and vibration impacts	The impact of noise and vibration during construction and decommissioning on human and ecological receptors should be considered particularly during the formation of the access tracks, piling works, construction of hard-standings, cable trenching and landscaping works. During operation, the ES should describe the potential sources of vibration arising from the operation of substation and battery storage infrastructure for example, and any measures to control emissions.

3.7 Climate Change

(Scoping Report Section 13)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.7.1	Paragraph 13.4.11 Table 19.1	Alterations in air quality conditions as a consequence of climate change	The Scoping Report states that an increase in winter rainfall and/or in heavy rain days could lead to a possible decrease in relevant pollutant concentrations, with a decrease in summer rainfall leading to a possible increase in concentrations, and that it is not anticipated that air quality conditions at the Proposed Development Site will fail to meet relevant air quality objectives as a consequence of projected climate change. The Inspectorate agrees that this matter can be scoped out of the assessment on this basis.
3.7.2	Paragraph 13.4.11 Table 19.1	Increases in noise from cooling equipment due to higher temperatures	The Inspectorate agrees that this matter can be scoped out of the climate change impact assessment on the basis that this will be addressed within the Noise and Vibration chapter of the ES.
3.7.3	Paragraph 13.4.11 Table 19.1	Increases in rainfall which could lead to flooding episodes on the development site which in turn could affect delivery options	The Inspectorate agrees that an additional assessment of this matter is not required in the Climate Change chapter as it will also be considered in the assessment of flood risk in the Hydrology, Hydrogeology, Flood Risk and Drainage section of the ES.
3.7.4	Paragraph 13.4.11	Transport and access - disruption	The Scoping Report states that increased rainfall/ storms have the potential to lead to traffic disruption during flooding episodes, and that increased summer temperatures may cause some disruption and discomfort. The Applicant considers that this topic can be scoped out of the in-combination climate change impact assessment and that it will not require further consideration as it is unlikely to be a

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			significant concern, particularly for the operational phase of the development. The Inspectorate agrees that this matter can be scoped out of the assessment on this basis.
3.7.5	Paragraph 13.4.11	Ground conditions – airborne particulates from soil increasing through changes in climate factors	Due to the historical uses of the Proposed Development Site the Applicant does not consider it to contain contaminated land. The Inspectorate considers that this matter can be scoped out of the assessment, provided that information demonstrating that the Proposed Development Site is not contaminated land is included with the ES.
3.7.6	Paragraph 13.4.11	Socio economics and human health – flood events.	The Inspectorate agrees that this matter can be scoped out of the assessment as climate change and flood risk are not likely to result in a significant effect on human health or socio economics as a result of the Proposed Development.
3.7.7	Table 19.1	Effects of higher temperatures in summer months on construction teams and the need for climate change adaption.	The Inspectorate agrees that it is unlikely that significant climate change effects on temperature and construction workers would arise as a result of the Proposed Development and that this matter can be scoped out.

ID	Ref	Description	Inspectorate's comments
3.7.8	Section 13.4	Methodology	The ES should ensure that where guidance is used to inform the assessment methodology that it is clear how it has been applied and where differences occur in the approach, that reasons are given for any changes.

ID	Ref	Description	Inspectorate's comments
			The ES should seek to agree the approach to the climate change assessment with the relevant consultation bodies with evidence of any agreement provided in the ES.
3.7.9	Paragraph 13.4.13	Resilience	Where relevant the Climate Change chapter of the ES should describe and assess the adaptive capacity that has been incorporated into the design of the Proposed Development. This may include, for example alternative measures, such as changes in the use of materials or construction and design techniques that will be more resilient to risks from climate. This should include a description of any measures embedded into the design to enable climate resilience during construction, operation and decommissioning.

3.8 Transport and Access

(Scoping Report Section 14)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.8.1	Paragraphs 14.4.1 and 14.4.2	Detailed assessment of traffic where the relevant thresholds are not exceeded – all phases	The Scoping Report states that where the predicted increase in traffic and heavy goods vehicles (HGVs) flows are lower than the 30% threshold and 10% threshold (where links are in proximity to sensitive receptors) for detailed assessment set out in the Institute of Environmental Management and Assessment (IEMA) guidance 'Environmental Assessment of Traffic and Movement' (2023), the significance of the effects would be low and not significant, and a detailed assessment would not be required. The Inspectorate is content to scope out detailed assessments where the relevant thresholds have not been exceeded, subject to the ES confirming the numbers and types of vehicles for all phases (with reference to thresholds within guidance), as well as proposed access/ transport routes to justify this position.
3.8.2	Paragraph 14.2.6 Table 19.1	Potential impacts on the Strategic Road Network (SRN) – all phases	The Scoping Report states that it is anticipated that the development impact, comparing to the existing flows on the Strategic Road Network (SRN) will be negligible, and therefore it is anticipated these links will be scoped out of any further assessment. Subject to confirmation on traffic numbers, routes and the rationale concluding that there will be negligible impact on the SRN, and with agreement from the local highway authority and National Highways, the Inspectorate agrees that this matter can be scoped out of the assessment. The ES should identify likely construction traffic routes and numbers of movements and describe how the Proposed Development is likely to impact the SRN. Significant effects on the SRN should be assessed where they are likely to occur.

ID	Ref	Description	Inspectorate's comments
3.8.3	Paragraph 2.1.3	Impacts on users of PRoWs or other recreational routes	Given the presence of PRoWs within the site, the ES should confirm whether the Proposed Development would result in any PRoW or other recreational routes being diverted or stopped up, on either a temporary or permanent basis. The ES should assess impacts to users of PRoW or other recreational routes (including severance, delay, amenity, fear/ intimidation and safety) during construction, operation and decommissioning which are likely to result in significant effects. Where relevant, the ES should assess potential interactions between aspect assessments, for example, traffic and access, noise, air quality, landscape and visual impact and residential amenity. The locations of any diversions or closures should be illustrated on suitable figures in the ES.
3.8.4	Paragraph 14.2.8	Study area	The ES should confirm the final study area and key roads included in the assessment and explain how they have been identified. In addition to agreement with the local highway authority, consideration should also be given to industry guidance and the extent of the potential impacts and likely receptors, both human and ecological. A plan illustrating the extent of the study area, the expected route(s) of construction traffic and the anticipated numbers of vehicle movements should be included in the ES, showing vehicle type, peak hour and daily movements.
3.8.5	Paragraph 14.3.2	Decommissioning Traffic Management Plan	The Inspectorate would expect to see the proposed Decommissioning Traffic Management Plan, agreed with the relevant consultation bodies, secured through the inclusion of an Outline Decommissioning Plan or similar with the DCO application. The ES should clearly set out

ID	Ref	Description	Inspectorate's comments
			how decommissioning is to be assessed and any components which may remain following decommissioning.
3.8.6	n/a	Abnormal Indivisible Loads (AILs)	The Scoping Report does not set out whether any AIL movements would be required. The ES should detail whether any AIL movements are required (for example the larger infrastructure such as the BESS) and assess any potential significant effects.

3.9 Air Quality

(Scoping Report Section 15)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.9.1	Paragraphs 15.3.4 15.4.7 15.4.8 Table 19.1	Air quality – dust emissions during construction and decommissioning	The Inspectorate does not consider that sufficient information has been provided at this stage regarding dust suppression techniques and the location of potential dust sensitive environmental receptors to support the scoping out of dust emissions during construction and decommissioning from further assessment. An assessment of dust impacts that conforms with relevant guidance (e.g., the Institute of Air Quality Management (IAQM)) on construction dust should be provided to demonstrate that mitigation measures proposed are appropriate for the scale of effects. The Inspectorate considers that once operational, the Proposed Development is unlikely to result in significant air quality effects as the components of the Proposed Development do not produce dust emissions.
3.9.2	Paragraphs 15.3.4 Table 19.1	Impacts to air quality at sensitive human and ecological receptors from non-road mobile machinery (NRMM).	The Inspectorate agrees that emissions from NRMM can be scoped out provided information on the type, duration and location of NRMM is shown in the ES to demonstrate that this would not result in LSE.
3.9.3	Paragraph 15.3.4 Table 19.1	Air quality impacts during operation	The Applicant proposes to scope out impacts to air quality at sensitive human and ecological receptors from the operational phase on the basis that road traffic flows during operation are expected to be minimal and no combustion plant would be present on site. The Inspectorate agrees that operational vehicle emissions may be scoped out from further assessment, subject to the description of

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			development demonstrating that vehicle numbers are sufficiently low as to not trigger the thresholds for an air quality assessment.
3.9.4	Paragraphs 15.3.1 15.3.2	Air quality impacts from road traffic emissions – decommissioning	The Scoping Report proposes to scope out a separate assessment of air quality impacts associated with road traffic emissions on the basis that potential air quality effects during decommissioning are anticipated to be similar to, or of lesser magnitude than the construction phase and proposes to scope this matter out. The Inspectorate agrees that this matter can be scoped out, subject to evidence provided in the ES demonstrating that road traffic emission effects during the decommissioning phase would be similar to or less than during the construction phase, or there is clear agreement with relevant consultation bodies.

ID	Ref	Description	Inspectorate's comments
	Paragraphs 15.4.2 15.4.3	Study area	The Scoping Report states that the study area for sensitive ecological receptors will be up to 50m from the site boundary or 50m from the edge of the routes used by construction vehicles. The ES should provide justification with reference to the relevant guidance for the study area for ecological receptors and agree this where possible with relevant consultation bodies. The ES should include a plan showing the extent of the final study area, including proposed construction routes, the location of receptors (human and ecological) considered in the assessment.
	Paragraph 15.4.10	Baseline	The Scoping Report details that dispersion modelling calculations (if required) would be verified using data gathered in the baseline air

ID	Ref	Description	Inspectorate's comments
			quality survey and Local Authority monitoring stations where appropriate. From the information provided within the Scoping Report it is unclear whether primary data collection is planned. Effort should be made to reach agreement with relevant consultation bodies including the local authorities, as to whether any additional survey or monitoring work is required to inform the baseline, including for other pollutants.

3.10 Land Use and Agriculture

(Scoping Report Section 16)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.10.1	n/a	n/a	No matters have been proposed to be scoped out of the assessment.

ID	Ref	Description	Inspectorate's comments
3.10.2	Paragraphs 16.2.1 – 16.2.4	Agricultural land classification (ALC) and best and most versatile (BMV) agricultural land	The Inspectorate notes that an ALC survey will be carried out within the Proposed Development Site boundary to inform the baseline assessment of BMV agricultural land. The Applicant should ensure that the survey has sufficient coverage across the Proposed Development including the cable route to accurately inform the assessment in line with relevant guidance and/or standards (e.g. Natural England Technical Information Note TIN049, 2012), or justify why an alternative surveying methodology approach is sufficient. The Applicant's attention is directed to Natural England's comments on ALC and BMV land included in their response in Appendix 2 of the Scoping Opinion. The ES should also show regard to the quantity and quality of land that will be temporarily and permanently lost to the Proposed Development and the potential for cumulative impacts at a regional scale with other plans and projects that result in a reduction of available BMV land. The ES should demonstrate that the ALC survey has been undertaken by an experienced and qualified surveyor or assessor and that the

ID	Ref	Description	Inspectorate's comments
			survey method used is in accordance with relevant guidelines to determine ALC grade and soil quality. The areas of land assessed in the survey should clearly show the classification of each of the areas (e.g. in a table) with justification for the use of the land by grade. The ES should demonstrate that the mitigation hierarchy has been fully applied, to show that options have been considered to avoid or minimise loss of BMV land and maximise use of poorer quality agricultural land and, where BMV land is required, to provide a clear justification for why this has been necessary. The ES should also show the approach to construction, including any excavation and preservation of topsoil, selection of piling methods and machinery to reduce the impact of compaction, timing (e.g during drier conditions), and a commitment to applying the relevant codes of practice in relation to soil handling. Additionally, the ES should include details of the decommissioning phase including the after use of the Proposed Development, with details relating to proposed methods of returning land to its previous condition with respect to the baseline ALC survey, including an appropriate aftercare programme and opportunities for continued agricultural use and / or grassland management for biodiversity.
3.10.3	Paragraph 16.3.1	Likely significant effects – sheep grazing	The ES should explain the benefits of grazing sheep at the operational site and what impacts this may have when considered against the existing land use.
3.10.4	Paragraph 16.3.2	Ground Disturbance	The ES should describe the construction, operation and decommissioning activities and how infrastructure has been located to avoid/minimise impacts of ground disturbance on soil and BMV land.

ID	Ref	Description	Inspectorate's comments
			A description of how the Proposed Development's design components have been selected, and how construction methods and the timing for construction for instance has been determined as part of the assessment of impacts on soil quality should be included in the ES. Impacts should be assessed where significant effects are likely to occur.
3.10.5	Paragraph 16.5.2	Cumulative impacts	The Scoping Report states that sites smaller than 20h will not be included within the cumulative assessment as a development of this size would not normally be considered for its impact for loss of agricultural land. Cumulative impacts on BMV land should be assessed at a national and local level. The Inspectorate advises that effort should be made to agree the methodology, study area and approach to the assessment with relevant consultation bodies and would expect the ES to provide clear justification for how the use of this threshold allows cumulative impact to be assessed.
3.10.6	Section 16.5	Cumulative economic impacts	The ES should assess the cumulative economic impacts of the Proposed Development alongside other similar NSIP schemes in the area such as Cottam, Gate Burton and Heckington Fen including loss of agricultural land and crop production. Cumulative economic impacts on agricultural businesses and agricultural suppliers should be considered, taking account of relevant guidance from IEMA for example.
3.10.7	Paragraph 16.6.1	Soil resource	The ES should include an assessment of the effects on soil resources and soil structure, due to the potential for soils stripping during construction, compaction from construction and decommissioning activity and to identify potential measures for appropriate soil

ID	Ref	Description	Inspectorate's comments
			handling and storage, as well as setting out how any potential adverse impacts can be avoided or minimised.
3.10.8	Paragraph 16.6.1	Soil Management Strategy	The Scoping Report states that an outline Soil Management Strategy will be produced. For clarity this should be provided with the application and detail how this is secured through the DCO.
3.10.9	Paragraph 16.6.1	Mitigation measures in respect to agriculture	The ES should include a description of all proposed mitigation or compensatory measures and state how these measures will be secured.

3.11 Glint and Glare

(Scoping Report Section 17)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.11.1	n/a	n/a	No matters have been proposed to be scoped out of the assessment.

ID	Ref	Description	Inspectorate's comments
3.11.2	Paragraphs 17.2.3 17.4.3	Ground-based receptors	The ES should justify the proposed assessment area of 1km as appropriate, explaining how elevated receptors which may overlook

ID	Ref	Description	Inspectorate's comments
			the site have been considered in the assessment. Receptors should include PRoWs and bridleways as well as residential and road users.
3.11.3	Paragraphs 17.2.5 17.4.3	Railway receptors	The Scoping Report highlights that only railway receptors within 500m of the solar panel area will be included within the assessment based on a previous consultation with Network Rail. The ES should justify the study area, explaining why no significant effects would occur beyond 500m.
3.11.4	n/a	River users – navigation safety	The proposed assessment area should include river users on the River Trent, to ascertain whether the potential impact of glint or glare may give rise to LSEs. The Applicant's attention is directed to the comments from the Canal and River Trust in Appendix 2 on this matter.
3.11.5	n/a	Sensitive receptors	The Applicant is advised to use the ZTV developed for the LVIA to identify sensitive receptors with potential views of the site that may be affected by glint and glare. Effort should be made to agree the sensitive receptors with relevant consultation bodies. The locations of the sensitive receptors should be shown on an accompanying plan.

3.12 Miscellaneous Issues

(Scoping Report Section 18)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.12.1	n/a	n/a	No matters have been proposed to be scoped out of the assessment

ID	Ref	Description	Inspectorate's comments
3.12.2	Paragraphs 18.3.1 – 18.3.2	Electromagnetic Fields (EMF)	The Applicant considers that the most significant EMF sources for the Proposed Development are likely to be the cable routes and associated infrastructure that connect the Proposed Development to the National Grid infrastructure at West Burton Power Station, and the scope of the assessment of EMFs in the ES is limited to the operational impact/consideration of any cables associated with the development which exceed 132kV. The only part of the Proposed Development likely to exceed this voltage is the underground export cables between the onsite substation and the existing West Burton substation which will likely be an underground 400kV cable. The ES should detail any design measures taken to avoid potential adverse effects from EMF in consultation with relevant consultation bodies as necessary.
3.12.3	Paragraphs 18.3.5 – 18.4.4	Waste	The ES should assess any impacts from off-site transport and disposal of waste generated during construction and decommissioning which are likely to result in significant effects. Any assumptions made, such as with regard to quantities of contaminated material, should be clearly set out and justified in the ES. The CEMP and Outline Decommissioning Environmental Management Plan (ODEMP) should include as much detail as possible on how waste

ID	Ref	Description	Inspectorate's comments
			would be managed in accordance with the waste management hierarchy, including any end use of the PV panels. The Applicant's attention is directed to the consultation response from Lincolnshire County Council with respect to cumulative waste impacts in Appendix 2 of this Scoping Opinion.

APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

TABLE A1: PRESCRIBED CONSULTATION BODIES[1]

SCHEDULE 1 DESCRIPTION	ORGANISATION
Health and Safety Executive	Health and Safety Executive
NHS England	NHS England
The relevant Integrated Care Board	NHS Lincolnshire
	NHS Nottingham and Nottinghamshire
Natural England	Natural England
The Historic Buildings and Monuments Commission for England	Historic England (East Midlands)
The relevant fire and rescue authority	Nottinghamshire and City of Nottingham Fire and Rescue Service
The relevant police and crime commissioner(s)	Nottinghamshire Police and Crime Commissioner
	Lincolnshire Police and Crime Commissioner
The relevant parish council(s)	North Leverton with Habblesthorpe Parish Council
	Sturton Le Steeple Parish Council [also acting on behalf of West Burton Parish Council]
	Clarbourough and Welham Parish Council
	North and South Wheatley Parish Council
	Knaith Parish Council
	Marton and Gate Burton Parish Counci
The Environment Agency	The Environment Agency - East Midlands and Lincolnshire and Northamptonshire

[1] Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (the 'APFP Regulations')

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Civil Aviation Authority	Civil Aviation Authority
The Relevant Highways Authority	Nottinghamshire County Council
The relevant strategic highways company	National Highways (Midlands)
The Coal Authority	The Coal Authority
The relevant internal drainage board(s)	Upper Witham Internal Drainage Board
	Trent Valley Internal Drainage Board
	Isle of Axholme and North Nottinghamshire Water Level Management Board
	Scunthorpe and Gainsborough Internal Drainage Board
The Canal and River Trust	The Canal and River Trust
The Forestry Commission	The Forestry Commission - East and East Midlands

TABLE A2: RELEVANT STATUTORY UNDERTAKERS[2]

STATUTORY UNDERTAKER	ORGANISATION
The relevant Integrated Care Board	NHS Nottingham and Nottinghamshire
NHS England	NHS England
The relevant NHS Trust	East Midlands Ambulance Service NHS Trust
Railways	Network Rail Infrastructure Ltd
	National Highways Historical Railways Estate
	Network Rail

[2] 'Statutory Undertaker' is defined in the APFP Regulations as having the same meaning as in Section 127 of the Planning Act 2008 (PA2008)

STATUTORY UNDERTAKER	ORGANISATION
Canal Or Inland Navigation Authorities	The Canal and River Trust
The Civil Aviation Authority	The Civil Aviation Authority
Licence Holder (Chapter 1 Of Part 1 Of Transport Act 2000)	NATS En-Route Safeguarding
Universal Service Provider	Royal Mail Group
Homes and Communities Agency	Homes England
The Environment Agency	The Environment Agency - East Midlands and Lincolnshire and Northamptonshire
The relevant water and sewage undertaker	Anglian Water
The relevant public gas transporter	Cadent Gas Limited
	Northern Gas Networks Limited
	Scotland Gas Networks Plc
	Southern Gas Networks Plc
	CNG Services Ltd
	Energy Assets Pipelines Limited
	ES Pipelines Ltd
	ESP Connections Ltd
	ESP Networks Ltd
	Fulcrum Pipelines Limited
	GTC Pipelines Limited
	Harlaxton Gas Networks Limited
	Independent Pipelines Limited
	Indigo Pipelines Limited
	Last Mile Gas Ltd
	Leep Gas Networks Limited

STATUTORY UNDERTAKER	ORGANISATION
	Mua Gas Limited
	Quadrant Pipelines Limited
	Squire Energy Limited
	National Gas
	Humbly Grove Energy Services Limited
	Saltfleetby Energy Limited
	Severn Gas Transportation Limited
The relevant electricity generator with CPO Powers	Cottam Power Station
	West Burton Power Station
The relevant electricity distributors with CPO Powers	National Grid Electricity Distribution (West Midlands) Limited
	Aidien Ltd
	Eclipse Power Network Limited
	Energy Assets Networks Limited
	ESP Electricity Limited
	Fulcrum Electricity Assets Limited
	Harlaxton Energy Networks Limited
	Independent Distribution Connection Specialists Ltd
	Independent Power Networks Limited
	Indigo Power Limited
	Last Mile Electricity Ltd
	Leep Electricity Networks Limited
	Mua Electricity Limited
	Optimal Power Networks Limited
	Squire Energy Metering Ltd

STATUTORY UNDERTAKER	ORGANISATION
	The Electricity Network Company Limited
	UK Power Distribution Limited
	Utility Assets Limited
	Vattenfall Networks Limited
The relevant electricity transmitters with CPO Powers	National Grid Electricity Transmission Plc
	National Grid Electricity System Operation Limited

TABLE A3: SECTION 43 LOCAL AUTHORITIES (FOR THE PURPOSES OF SECTION 42(1)(B))[3]

LOCAL AUTHORITY[4]
Newark and Sherwood District Council
West Lindsey District Council
Bolsover District Council
Mansfield District Council
City of Doncaster Council
Rotherham Metropolitan Borough Council
Bassetlaw District Council
Nottinghamshire County Council
Nottingham City Council
North Lincolnshire Council
Derbyshire County Council
Leicestershire county Council
Lincolnshire County Council

[3] Sections 43 and 42(B) of the PA2008

TABLE A4: NON-PRESCRIBED CONSULTATION BODIES

ORGANISATION
East Midlands Combined County Authority

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE:
Anglian Water
Bassetlaw District Council
Bolsover District Council
Cadent Gas
Canal and River Trust
City of Doncaster Council
Clarborough and Welham Parish Council
The Coal Authority
Derby City Council
The Forestry Commission
The Health and Safety Executive
Historic England
Lincolnshire County Council
Mansfield District Council
National Gas
NATS Safeguarding
Natural England
Newark and Sherwood District Council
Nottingham City Council
Nottinghamshire County Council
Rotherham District Council
Sturton le Steeple Parish Council

Anglian Water Services
Lancaster House, Lancaster Way,
Ermine Business Park, Huntingdon,
Cambridgeshire. PE29 6XU

www.anglianwater.co.uk

Our ref: Steeple Renewables/
ScopingResponse

By Email: Planning Inspectorate
SteepleRenewables@planninginspectorate.gov.uk

21st May 2024

Dear Mr. Wallis,

Application by Renewable Energy Solutions (RES) (the Applicant) for an Order granting Development Consent for the Steeple Renewables Project (the Proposed Development) - Anglian Water EIA scoping consultation response.

Thank you for the opportunity to comment on the EIA scoping report for above project, which is located within the Bassetlaw District of Nottinghamshire. The project is one of several NSIP solar projects in Lincolnshire/ Nottinghamshire which Anglian Water has been consulted on by the Planning Inspectorate.

Anglian Water is the appointed water undertaker for the main site as well as the cable route/ grid connection area, shown on Figure 1.1 Site Location Plan. Water recycling services are provided by Severn Trent Water.

The following response is submitted by Anglian Water, in its statutory capacity relating to potable water and water resources assets along with any wastewater and water recycling assets, where applicable.

The Scheme – Anglian Water Existing Infrastructure

Anglian Water works to support the construction and operation of national infrastructure projects that are conducted in accordance with the Water Industry Act 1991. We would expect that the Environmental Statement would include reference to any existing infrastructure managed by Anglian Water and the provision of replacement infrastructure and the requirements for new infrastructure.

Anglian Water works with developers, including those constructing projects under the 2008 Planning Act, to ensure requests for alteration of sewers, wastewater and water supply infrastructure is planned to be undertaken with the minimum of disruption to the project and customers.

Given the potential location and likely extent of the proposed development area, there could be existing Anglian Water assets both above and below ground, which serve the surrounding businesses and community. For example, there are existing Anglian Water assets including several water mains within the project area such as within roads / road verges which link the various settlements.

Utilities searches should, therefore, be undertaken to establish the extent of Anglian Water's assets within the scheme's application boundary. These should be mapped to establish interactions with assets and the scheme designed to avoid impacts upon those assets. Anglian Water would want to ensure the location and nature of these assets is identified and protected. To reduce the need for diversions and the attendant carbon impacts of those works, ground investigation would enable the promoter to design out these potential impacts and so also reduce the potential impact on services if construction works cause a pipe burst or damage to all supporting infrastructure.

Maps of Anglian Water's underground assets are available to view at the following link:

http://www.digdat.co.uk/

For further information on the above ground assets, you should contact Anglian Water's estates team on: awsestates@savills.com

Anglian Water's preference is to work with the applicant during the pre-application phase to reach agreement on design changes, mitigation and protection measures in the application prior to submission. This ensures that work to divert existing assets is minimised, reducing project costs and the carbon costs of the project. We would welcome on-going engagement to ensure that Anglian Water and the project have reached agreement on the approach to assets and connections in order that these matters are not drawn out during the Examination.

Scheme assessment, design, mitigation and connections

Water resources

Within Chapter 9 'Hydrology, Hydrogeology, Flood Risk and Drainage', the scoping report makes number of references to water demand at construction, operation and de-commission stages of the project (paras. 9.3.10, 9.3.14 and 9.3.22). It is not anticipated that there will be significant water requirements at either of these stages and these have been scoped out.

Anglian Water wishes to point out that there are several other projects in the area with a potentially cumulative impact for demand for water resources. There is a need, therefore, to further establish and set out in more detail how the project will be supplied with water and if connections to our networks are required. Also, how water assets serving residents and business will be protected and how the design has been altered to reduce the need for new water infrastructure or the diversion of existing assets.

Anglian Water does not consider that sufficient information has been provided to reach a conclusion on the project impacts regarding water supply. Impacts of climate change in terms

of water availability for the construction, operation and decommissioning stages are also of relevance. Anglian Water requests that these points are covered in the EIA.

Anglian Water now advise that new non-household water supply requests (construction and operational phases) may be declined as these could compromise our regulatory priority of supplying existing and planned domestic growth. The flows needed to fill water storage tanks for example (if rainwater harvesting on site is not used to meet non-potable demand) will need to be assessed by Anglian Water to advise whether a supply is feasible, when assessed in terms of the potential to jeopardise domestic supply or at a significant financial or environmental cost.

Our new position on non-household supply is due to our joint aim with the Environment Agency of reducing abstraction to protect sensitive environments. The promoter will need to submit a water resources assessment setting out a daily demand for each stage of the project and whether this is for domestic or non-domestic uses. Further advice on water capacity and options can be obtained by contacting Anglian Water's Pre-Development Team at: planningliasion@anglianwater.co.uk

Flood Risk, Drainage and Surface Water

Anglian Water notes at para. 9.3.21 that a Flood Risk Assessment (FRA) including Surface Water Drainage Strategy has been scoped in and will support the assessment of flood risk impacts. The Surface Water Drainage Strategy will be based on the use of Sustainable Drainage Systems (SuDS), which will demonstrate how surface water runoff from the proposed development will be managed.

We would welcome confirmation that the design of drainage will either be SuDS or a self-contained system for the construction and operational phases, which uses SuDS for rainwater harvesting for non-potable uses during construction and then operation.

Construction Environment Management Plan (CEMP)

We welcome the intention (para 4.6.2) to produce a CEMP. This should include steps to remove the risk of damage to Anglian Water assets from plant and machinery (compaction and vibration during the construction phase) including any haul and access roads and crossings. Further advice on minimising and then relocating (where feasible) Anglian Water existing assets can be obtained from: connections@anglianwater.co.uk

Engagement, the draft DCO Order and assisting the applicant

We note that at para 18.2.3 of the Scoping Report, the project plans to engage with several consultees. We would consider that Anglian Water should be included on the list of consultees to be drawn up by the applicant to follow their proposed approach to assessment and consultation set out in Chapter 9.

Anglian Water would welcome the instigation of discussions with RES Limited prior to the project layout and initial design and to assist the applicant before the submission of the Draft DCO for examination. We would recommend discussion on the following issues:

1. Impact of development on Anglian Water's assets and the need for mitigation.
2. The design of the project to minimise interaction with Anglian Water assets/critical infrastructure and specifically to avoid the need for mitigation works and diversions which have associated carbon costs.
3. Requirements for potable and raw water supplies.
4. Pre-construction surveys.
5. Draft Protective Provisions.

Advice on the form and content of suitable Protective Provisions in the draft Development Consent Order should be sought. Please do not hesitate to contact Carry Murphy [redacted]@angliawater.co.uk on these aspects or should you require clarification on the above response or during the pre- application to decision stages of the project.

Yours sincerely,

[redacted]

Phil Jones
Growth & Strategy Manager – Sustainable Growth

c.c. info@steeplerenewablesproject.co.uk

From: [redacted]
To: Planning
Cc: [redacted]
Subject: 24/00509/PREAPP Steeples Renewables Project
Date: 03 May 2024 15:59:53
Attachments: ufm19_NSIP_-_Consultation.rtf
Grid Scale Battery Energy Storage System planning Guidance for FRS.pdf

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Dear Sir,

In response to the above please find the following on behalf of the Fire Authority.

On receipt of a full planning application for the above proposed development the Fire Authority would ask that the matters on the attached Grid Scale Energy Storage System planning guidance document are addressed.

In addition to this any buildings that form part of the scheme are likely to be covered by approved documents pertaining to their construction and subsequently Fire Safety Legislation could apply.

The Fire Authority looks forward to further consultation on receipt of the final planning application to follow in 2025.

Regards

Tom

Tom Clark
Station Manager
Fire Protection - North
Nottinghamshire Fire & Rescue Service
(0115) 8388753

General Fire Protection Enquiries – (01158) 388207

Creating Safer Communities

Website: www.notts-fire.gov.uk
Twitter: @NottsFire
Facebook: NottsFRS

Grid Scale Battery Energy Storage System planning – Guidance for FRS

Grid scale Battery Energy Storage Systems (BESS) are a fundamental part of the UK's move toward a sustainable energy system. The installation of BESS systems both in the UK and around the globe is increasing at an exponential rate. A number of high profile incidents have taken place and learning from these incidents continues to emerge.

In the UK, approval for the majority of BESS installations takes place through the Local Authority planning process. Fire and Rescue Services (FRSs) may be engaged throughout the planning process, but this is not a statutory requirement. However, the National Fire Chiefs Council would encourage early engagement with the local FRS, continuing throughout the planning process.

The NFCC's expectation is that a comprehensive risk management process must be undertaken by operators to identify hazards and risks specific to the facility and develop, implement, maintain and review risk controls. From this process a robust Emergency Response Plan should be developed.

Given the rapidly developing nature of the technology, and ever evolving understanding of risks and mitigation measures, there is a need for guidance to support FRSs in providing consistent and evidence-based contributions to the planning process.

The guidance does not seek to provide a full specification or opinion on the entirety of a BESS system design. Instead, the aim is to limit the content to such matters that directly relate to facilitating a safe and effective response, by the fire and rescue service, to a fire or vapour cloud release involving a BESS installation. This includes factors such as facilities for the fire and rescue service, and design factors that contribute to reducing the escalation in the severity of an incident.

This guidance relates specifically to grid scale (typically 1 MW or larger) BESS in open air environments, using lithium-ion batteries.

The guidance is based upon a range of supporting materials including academic research, national and international standards, case studies, and industry guidance. The content of this document is the result of analysis of that supporting material with subsequent professional judgement applied. Every BESS installation will be different and fire and rescue services should not limit themselves to the content of this guidance. Particular reference has been made to the following:

- State of Victoria (County Fire Authority) (2022), *Design Guidelines and Model Requirements: Renewable Energy Facilities*
- FM Global (2017) *Property Loss Prevention Data Sheets: Electrical Energy Storage Systems Data Sheet 5-33*
- NFPA (2023) *Standard for the Installation of Stationary Energy Storage Systems*

Further advice and guidance can be obtained through the NFCC Alternative Fuels and Energy Systems lead officer.

This document contains guidance on:

1. Information requirements
2. System design, construction, testing and decommissioning
3. Detection and monitoring
4. Suppression systems
5. Site access
6. Water supplies
7. Emergency plans
8. Environmental impacts
9. Recovery

Principles

This guidance has been developed with the safety of the public and emergency responders in mind. It is based on trying to help reduce the risk as far as reasonably practicable, whilst recognising that ultimate responsibility for the safe design and running of these facilities rests with the operator.

The guidelines are a starting point and cannot cover every eventuality or type of design.

In developing these guidelines the hazards and risks from lithium-ion batteries, identified in National Operational Guidance, has been considered.

The following principles should be considered by Fire Services, when liaising with owners and operators, and form the basis of this guidance[1]:

1. Effective identification and management of hazards and risks specific to the siting, infrastructure, layout, and operations at the facility.
2. Impact on surrounding communities, buildings, and infrastructure.
3. Siting of renewable energy infrastructure so as to eliminate or reduce hazards to emergency responders.
4. Safe access for emergency responders in and around the facility, including to energy storage infrastructure and firefighting infrastructure.

[1] State of Victoria (County Fire Authority) (2022), *Design Guidelines and Model Requirements: Renewable Energy Facilities*, p.4

5. Provision of adequate water supply and firefighting infrastructure to allow safe and effective emergency response.
6. Vegetation sited and managed so as to avoid increased bushfire and grassfire risk.
7. Prevention of fire ignition on-site.
8. Prevention of fire spread between site infrastructure (solar panel banks, wind turbines, battery containers/enclosures).
9. Prevention of external fire impacting and igniting site infrastructure.
10. Provision of accurate and current information for emergency responders during emergencies.
11. Effective emergency planning and management, specific to the site, infrastructure and operations.
12. Owner to have a comprehensive Emergency Response Plan, showing full understanding of hazards, risks, and consequences.

Information Requirements

Grid scale BESS should form part of FRS planning in accordance with arrangements required under section 7(2)(d) of the Fire and Rescue Services Act (2004). Site Specific Risk Information (SSRI) should be made available to crews in the form of an effective Emergency Response Plan.

Details of any site access arrangements, such as key codes, should be provided to the FRS.

System design, construction, testing and decommissioning

Information is required as early as possible from the applicant /developer/designer/manufacturer etc., to allow an initial appraisal of the BESS to be made. This information should be provided to the FRS (via the Local Authority Planners in the first instance), with appropriate evidence provided to support any claims made on performance, and with appropriate standards cited for installation.

Such information should also be made available to FRSs for inclusion in Site Specific Risk Information (SSRI) records.

System design and construction

Information required:

1. The battery chemistries being proposed (e.g. Lithium-ion Phosphate (LFP), Lithium Nickel Manganese Cobalt Oxide (NMC)). Because:
    a. Battery chemistries will directly affect the heat released when a cell goes into thermal runaway[2]
    b. Battery chemistries will influence vapour cloud formation.

[2] https://www.nasa.gov/sites/default/files/atoms/files/nabw20_fire_gas_char_studies_liion_cells_batt_djuarez-robles.pdf

    c. An understanding of the battery chemistry is useful when requesting scientific advice during an incident.
2. The battery form factor (e.g. cylindrical, pouch, prismatic)
3. Type of BESS e.g. container or cabinet
4. Number of BESS containers/cabinets
5. Size/capacity of each BESS unit (typically in MWh)
6. How the BESS units will be laid out relative to one another.
7. A diagram / plan of the site.
8. Evidence that site geography has been taken into account (e.g. prevailing wind conditions).
9. Access to, and within, the site for FRS assets
10. Details of any fire-resisting design features
11. Details of any:
    a. Fire suppression systems
    b. On site water supplies (e.g. hydrants, EWS etc)
    c. Smoke or fire detection systems (including how these are communicated)
    d. Gas and/or specific electrolyte vapour detection systems
    e. Temperature management systems
    f. Ventilation systems
    g. Exhaust systems
    h. Deflagration venting systems
12. Identification of any surrounding communities, sites, and infrastructure that may be impacted as a result of an incident.

Testing

Details of any evidence based testing of the system design should be requested, for example, results of UL 9540A testing.

Design

Design features should be made clear. These may include:

- Rack layout and setup
- Thermal barriers and insulation
- Container layout and access arrangements

Detection and monitoring

An effective and appropriate method of early detection of a fault within the batteries should be in place, with immediate disconnection of the affected battery/batteries. This may be achieved automatically through the provision of an effective Battery Management System (BMS) and/or a specific electrolyte vapour detection system.

Should thermal runaway conditions be detected then there should be the facility in place for the early alerting of emergency services.

Detection systems should also be in place for alerting to other fires that do not involve thermal runaway (for example, fires involving electrical wiring).

Continuous combustible gas monitoring within units should be provided. Gas detectors should alarm at the presence of flammable gas (yes/no), shut down the ESS, and cause the switchover to full exhaust of the ventilation system[3]. Sensor location should be appropriate for the type of gas detected e.g. hydrogen, carbon monoxide, volatile organic compounds.

External audible and visual warning devices (such as cabinet level strobing lights), as well as addressable identification at control and indicating equipment, should be to linked to:

1. Battery Management System (when a thermal runaway event is identified)
2. Detection and suppression system activation

This will enable first responders to understand what the warning is in relation to. This will aid in their decision-making.

Suppression systems

Suitable fixed suppression systems should be installed in units in order to help prevent or limit propagation between modules.

Where it is suggested that suppression systems are not required in the design, this choice should be supported by an evidence based justification and Emergency Response Plan that is designed with this approach in mind (for example, risk assessed controlled burn strategies, and external sprinkler systems).

Whilst gaseous suppression systems have been proposed previously, current research indicates the installation of water based suppression systems for fires involving cell modules is more effective.

The installation of gaseous suppression systems for electrical fires that do not involve cell modules may be appropriate but should be built into a wider suppression strategy.

FM Global cite the following reasons for not recommending gaseous protection systems[4]:

1. **Efficacy relative to the hazard**. As of 2019, there is no evidence that gaseous protection is effective in extinguishing or controlling a fire involving energy storage systems. Gaseous protection systems may inert or interrupt the chemical reaction of the fire, but only for the duration of the hold time. The hold time is generally ten minutes, not long enough to fully extinguish an ESS fire or to prevent thermal runaway from propagating to adjacent modules or racks.

[3] FM Global (2017) *Property Loss Prevention Data Sheets: Electrical Energy Storage Systems*, para. 2.5.5.2
[4] FM Global (2017) *Property Loss Prevention Data Sheets: Electrical Energy Storage Systems*, para. 3.3

2. **Cooling**. FM Global research has shown that cooling the surroundings is a critical factor to protecting the structure or surrounding occupancy because there is currently no way to extinguish an ESS fire with sprinklers. Gaseous protection systems do not provide cooling of the ESS or the surrounding occupancy.
3. **Limited Discharge**. FM Global research has shown that ESS fires can reignite hours after the initial event is believed to be extinguished. As gaseous protection systems can only be discharged once, the subsequent reignition would occur in an unprotected occupancy

The choice of a suppression system should be informed by liaison with a competent system designer who can relate the system choice to the risk identified and the duration of its required activation. Such a choice must be evidence based.[5]

Any calculations for sufficient water supply for an appropriate suppression system will need to be completed by a competent person considering the appropriate risk and duration of any fire.

Water run-off and potential impact on the environment, along with mitigation measures, should be considered and detailed in the Emergency Response Plan.

Lack of sufficient water supplies at a particular site location should not be considered as the basis for a suppression system choice. Such an approach could result in potentially ineffective and/or dangerous system designs.

Deflagration Prevention and Venting

BESS containers should be fitted with deflagration venting and explosion protection appropriate to the hazard. Designs should be developed by competent persons, with design suitability able to be evidenced.[6] Exhaust systems designed to prevent deflagration should keep the environment below 25% of Lower Explosive Limit (LEL).

Flames and materials discharged as a result of any venting should be directed outside to a safe location and should not contribute to any further fire propagation beyond the unit involved or present further risk to persons. The likely path of any vented gasses or materials should be identified in Emergency Response Plans to reduce risk to responders.

Explosion/deflagration strategies should be built into the emergency plan such that responders are aware of their presence and the impact of their actions on these strategies.[7]

Where emergency ventilation is used to mitigate an explosion hazard, the disconnect for the ventilation system should be clearly marked to notify personnel or first responders to not disconnect the power supply to the ventilation system during an evolving incident.[8]

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[5] NFPA (2023) *Standard for the Installation of Stationary Energy Storage Systems*, para C.3
[6] BS EN 16009:2011 *Flameless Explosion Venting Devices*; BS EN 14373:2021 *Explosion Suppression Systems*; BS EN 14797:2007 *Explosion Venting Devices*.
[7] UL FRSI (2020) *Four Firefighters Injured in Lithium-ion Battery Energy Storage System Explosion – Arizona*, pp. 47-49
[8] NFPA (2023) *Standard for the Installation of Stationary Energy Storage Systems*, para G.1.4.3.3

Access

Site access

Suitable facilities for safely accessing and egressing the site should be provided. Designs should be developed in close liaison with the local FRS as specific requirements may apply due to variations in vehicles and equipment.

This should include:

- At least 2 separate access points to the site to account for opposite wind conditions/direction.
- Roads/hard standing capable of accommodating fire service vehicles in all weather conditions. As such there should be no extremes of grade.
- A perimeter road or roads with passing places suitable for fire service vehicles.
- Road networks on sites must enable unobstructed access to all areas of the facility.
- Turning circles, passing places etc size to be advised by FRS depending on fleet.

Access between BESS units and unit spacing

In the event of a fire involving a BESS unit, one of the primary tactics employed will be to prevent further unit to unit fire spread. Suitable access for firefighters to operate unimpeded between units will therefore be required. This should allow for the laying and movement of hose lines and, as such, access should be free of restrictions and obstacles. The presence of High Voltage DC Electrical Systems is a risk and their location should be identified. Exclusion zones should be identified.

A standard minimum spacing between units of 6 metres is suggested[9] unless suitable design features can be introduced to reduce that spacing. If reducing distances a clear, evidence based, case for the reduction should be shown.

Any reduction in this separation distance should be design based by a competent fire engineer. There should be consideration for the fire separation internally and the total realistic load of fire. Proposed distances should be based on radiant heat flux (output) as an ignition source.

The NFCC does not support the stacking of containers/units on top of one another on the basis of the level of risk in relation to fire loading, potential fire spread, and restrictions on access.

Distance from BESS units to occupied buildings & site boundaries

Individual site designs will mean that distances between BESS units and occupied buildings/site boundaries will vary. Proposed distances should take into account risk and mitigation factors. However, an initial minimum distance of 25 metres is proposed prior to any mitigation such as blast walls. Reduction of distances may be possible in areas of lower risk (e.g. rural settings). Where possible buildings should be located upwind.

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[9] FM Global (2017) *Property Loss Prevention Data Sheets: Electrical Energy Storage Systems*, para. 2.3.2.2

Site Conditions

Sites should be maintained in order that, in the event of fire, the risk of propagation between units is reduced. This will include ensuring that combustibles are not stored adjacent to units and access is clear and maintained. Areas within 10 metres of BESS units should be cleared of combustible vegetation and any other vegetation on site should be kept in a condition such that they do not increase the risk of fire on site. Areas with wildfire risk or vegetation that would result in significant size fires should be factored into this assessment and additional cleared distances maintained as required.

Water Supplies

Water supplies will depend on the size of the installation. In the majority of cases, initial firefighting intervention will focus on defensive firefighting measures to prevent fire spread to adjacent containers. As a result, proposals for water supplies on site should be developed following liaison with the local fire and rescue service taking into account the likely flow rates required to achieve tactical priorities. This should also take account of the ability of/anticipated time for the fire and rescue service to bring larger volumes of water to site (for example through the provision of High Volume Pumps).

IP ratings of units should be known so that risks associated with boundary cooling can be understood.

As a minimum, it is recommended that hydrant supplies for boundary cooling purposes should be located close to BESS containers (but considering safe access in the event of a fire) and should be capable of delivering no less than 1,900 litres per minute for at least 2 hours. Fire and rescue services may wish to increase this requirement dependant on location and their ability to bring supplementary supplies to site in a timely fashion.

Water supply for any automatic suppression system will be covered by the relevant standard/design depending on which system chosen as appropriate for the risk. For manual water, amounts should come from performance based requirement rather than a reference to a code, unless it can be proven that the code specifically covers BESS. Regarding water storage tanks, volumes will again need to be informed on a performance-based need. Isolation points should be identified.

Any static water storage tanks designed to be used for firefighting must be located at least 10 metres away from any BESS container/cabinet. They must be clearly marked with appropriate signage. They must be easily accessible to FRS vehicles and their siting should be considered as part of a risk assessed approach that considers potential fire development/impacts. Outlets and connections should be agreed with the local FRS. Any outlets and hard suction points should be protected from mechanical damage (e.g. through use of bollards).

Consideration should be given, within the site design, to the management of water run-off (e.g. drainage systems, interceptors, bunded lagoons etc).

Signage

Signage should be installed in a suitable and visible location on the outside of BESS units identifying the presence of a BESS system. Signage should also include details of:

- Relevant hazards posed
- The type of technology associated with the BESS
- Any suppression system fitted
- 24/7 Emergency Contact Information

Signs on the exterior of a building or enclosure should be sized such that at least one sign is legible at night at a distance of 30 metres or from the site boundary, whichever is closer[10].

Adherence to the Dangerous Substances (Notification and Marking of Sites) Regulations 1990 (NAMOS) should be considered where the total quantity of dangerous substances exceeded 25 tonnes.

Emergency Plans

Site operators should develop emergency plans and share these with the Fire and Rescue Service. These include:

A Risk Management Plan should be developed by the operator, which provides advice in relation to potential emergency response implications including:

- The hazards and risks at and to the facility and their proposed management.
- Any safety issues for firefighters responding to emergencies at the facility.
- Safe access to and within the facility for emergency vehicles and responders, including to key site infrastructure and fire protection systems.
- The adequacy of proposed fire detection and suppression systems (eg., water supply) on-site.
- Natural and built infrastructure and on-site processes that may impact or delay effective emergency response.

An Emergency Response Plan should be developed to facilitate effective and safe emergency response and should include:

- How the fire service will be alerted
- A facility description, including infrastructure details, operations, number of personnel, and operating hours.
- A site plan depicting key infrastructure: site access points and internal roads; firefighting facilities (water tanks, pumps, booster systems, fire hydrants, fire hose reels etc); drainage; and neighbouring properties.

[10] NFPA (2023) *Standard for the Installation of Stationary Energy Storage Systems*, para G.1.4.2.1.1

- Details of emergency resources, including fire detection and suppression systems and equipment; gas detection; emergency eye-wash and shower facilities; spill containment systems and equipment; emergency warning systems; communication systems; personal protective equipment; first aid.
- Up-to-date contact details for facility personnel, and any relevant off-site personnel that could provide technical support during an emergency.
- A list of dangerous goods stored on site.
- Site evacuation procedures.
- Emergency procedures for all credible hazards and risks, including building, infrastructure and vehicle fire, grassfire and bushfire

Environmental impacts

Suitable environmental protection measures should be provided. This should include systems for containing and managing water runoff. System capability/capacity should be based on anticipated water application rates, including the impact of water based fixed suppression systems.

Sites located in flood zones should have details of flood protection or mitigation measures.

Recovery

The operator should develop a post-incident recovery plan that addresses the potential for reignition of ESS and de-energizing the system, as well as removal and disposal of damaged equipment.[11]

[11] FM Global (2017) *Property Loss Prevention Data Sheets: Electrical Energy Storage Systems*, para. 2.8.2.3

Bassetlaw
DISTRICT COUNCIL
— North Nottinghamshire —

PLANNING APPLICATION CONSULTATION

Fire Protection North
Station Manager
Fire Protection North - Mansfield Fire Station.
Nottinghamshire Fire & Rescue Service

Consultation Date:	3 May 2024
Application No:	24/00509/PREAPP
Grid Ref:	E: N:
Proposal:	Proposed National Strategic Infrastructure Project Consultation from The Planning Inspectorate on Behalf of the Secretary of State for a Scoping Opinion
Site Address:	Steeple Renewables Project
Case Officer:	Amanda Broadhead **Call:** 01909 533259

Dear Sir / Madam,

Bassetlaw District Council has been asked the Planning Inspectorate on behalf of the Secretary of State for its opinion (a Scoping Opinion) as to the information to be provided in an Environmental Statement (ES) relating to the Proposed Development.

The Council would be grateful if you could

• Inform us of the information you consider should be provided in the ES; or
• Confirm that you do not have any comments.

You can find the relevant submission documents at the following link:
Steeple Renewables Project

I would be grateful if you could provide comments in respect of this submission within 14 days of the date of this letter.

Any observations or recommendations should be sent to Planning Services at the above address or by email to planning@bassetlaw.gov.uk. If you have any queries please contact the above name officer.

Yours faithfully

[redacted]

John Krawczyk
Development Team Manager

From:	[redacted]
[redacted]	[redacted]; SteepleRenewables@planninginspectorate.gov.uk
Cc:	Planning
Bcc:	[redacted]
Subject:	24-00509-PREAPP - Steeple Renewables Project - Conservation comments
Date:	21 May 2024 15:31:07
Attachments:	image001.png image002.png

PINS/Amanda

Heritage assets

The proposal area and its surroundings include a range of heritage assets of varied levels of significance. Within Bassetlaw, this includes 1 Scheduled Ancient Monument (SAM) within the boundary at Littleborough and a further SAM just outside (West Burton), a large number of Listed Buildings (LBs), non-designated heritage assets (NDHAs), 1 unregistered park & garden (Habblesthorpe Churchyard – see here), and 2 Conservation Areas (CAs) at Wheatley and Saundby.

There is also a complex network of unscheduled archaeology across the entire site (I defer to the views of the Lincolnshire/Nottinghamshire County Council archaeologists on that matter).

Outside of Bassetlaw, on the east side of the river in Lincolnshire, are a further set of designated and non-designated heritage assets including SAMs, LBs and NDHAs.

Littleborough SAM

Of particular concern is the inclusion of the **Littleborough Scheduled Ancient Monument** within the site area. This should be **removed** from the proposal at the earliest stage possible. A solar farm development would undoubtedly cause **substantial harm** if located directly on top of a SAM. The public benefits of solar development could be met on alternative, less heritage-sensitive sites in the wider area.

Conservation would also draw attention to paragraph 10.4.4, which states that for the development phase: *"There is the potential that if archaeological remains are found to exist within the Site, that the Proposed Development would cause some harm to these. However…it is considered that this would not result in a significant effect upon non-designated archaeological assets"*. This is incorrect, especially in close proximity to the SAMs and the Roman Road through Sturton le Steeple and Littleborough.

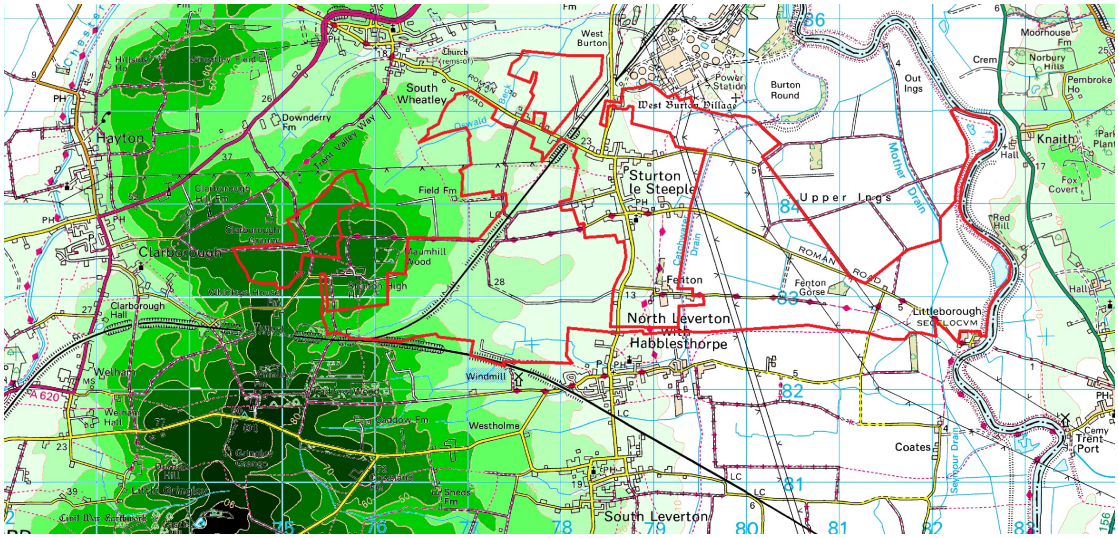
Desktop study

For the forthcoming desktop study, a 3km radius is proposed for designated heritage assets and a 1km radius for non-designated heritage assets. Conservation is broadly in agreement with this suggestion, although would request that exceptions are made for those taller and higher grade Listed Buildings nearby (especially Medieval churches). The setting of North Leverton Windmill also goes beyond the 3km distance, so impact upon that wide setting needs additional consideration.

Photographic study

A photographic viewpoints study will be required which takes into account the following:

- The setting of all heritage assets in the study area (note that 'setting' is much more than the visibility or otherwise of an asset; it also includes the wider experience of landscape, the built/natural environment and other such features);
- Key viewpoints along public highways and public rights of way;
- The natural contours of the landscape, including views from and towards publicly-accessible high and low points (contour map below).



- The impact of existing landscape screening including tree belts/clumps and hedgerows.

Data sources

For paragraph 10.5.7, I would suggest adding the 'Bassetlaw Heritage Mapping' web page to the list of data sources: https://www.bassetlaw.gov.uk/planning-and-building/planning-services/conservation-and-heritage/bassetlaw-heritage-mapping/. From this page, an up-to-date list of all heritage assets in Bassetlaw is available, together with a description of each non-designated heritage asset, a statement of significance for each unregistered park & garden, and a designation statement for each Conservation Area.

I trust these comments are of use. I would be happy to provide more detailed comments on particular sites if this is of use.

I look forward to receiving a consultation on the next stage of the proposal.

Regards, Michael

[redacted]

Michael S. A. Tagg BA (Hons), MSc, IHBC
Conservation Manager
Planning Services
Bassetlaw District Council
Queens Buildings
Potter Street
Worksop
Nottinghamshire
S80 2AH

Tel: 01909 533427

[redacted]

The Coal Authority

200 Lichfield Lane
Mansfield
Nottinghamshire
NG18 4RG

T: 01623 637 119 (Planning Enquiries)

E: planningconsultation@coal.gov.uk

W: www.gov.uk/coalauthority

For the attention of: Amanda Broadhead
Bassetlaw District Council

[By email: planning@bassetlaw.gov.uk]

13 May 2024

Dear Amanda Broadhead

Re: 24/00509/PREAPP

National Strategic Infrastructure Project Consultation from The Planning Inspectorate on Behalf of the Secretary of State for a Scoping Opinion; STEEPLE RENEWABLES, PROJECT

Thank you for your notification of 3 May 2024 seeking the views of the Coal Authority on the above.

The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

We have reviewed the site location plan provided and can confirm that the site falls within the Coal Authority's defined Development Low Risk Area. On this basis we have no specific comments to make.

However, in the interest of public safety, it is requested that the Coal Authority's Standing Advice note is drawn to the applicant's attention, where relevant.

Yours

The Coal Authority Planning Team

From: [redacted]
To: Planning; [redacted]
Subject: FW: 24/00509/PREAPP Consultation Response
Date: 20 May 2024 10:23:19
Attachments: image001.png

From: SM-NE-Consultations (NE) <consultations@naturalengland.org.uk>
Sent: 20 May 2024 10:18
To: Martyn Beckett [redacted]@bassetlaw.gov.uk>
Subject: 24/00509/PREAPP Consultation Response

External Message - Be aware that the sender of this email originates from outside of the Council. Please be cautious when opening links or attachments in email

Dear Martyn Beckett,

Application ref: 24/00509/PREAPP

Thank you for your consultation which was received 3 May 2024.

Natural England have already been consulted by the Planning Inspectorate directly regarding this consultation. As such will be providing our comments directly to the inspectorate.

Yours sincerely,

Dominic Rogers
Consultations Team
Natural England
Hornbeam House, Electra Way
Crewe, Cheshire, CW1 6GJ

Enquiries line: 0300 060 3900
Email: consultations@naturalengland.org.uk
www.gov.uk/natural-england

[redacted]@bassetlaw.gov.[redacted]@bassetlaw.gov.uk>
Sent: Friday, May 3, 2024 1:45 PM
To: SM-NE-Consultations (NE) <consultations@naturalengland.org.uk>

Subject: Planning Application Consultation 24/00509/PREAPP (PINS/NSIP Scoping)

Please see attached consultation

_____

[Bassetlaw District Council] Martyn Beckett
Systems Support Officer
Bassetlaw District Council, Potter Street, N/A, Worksop, Nottinghamshire, S80 2AH
W: www.bassetlaw.gov.uk<http://www.bassetlaw.gov.uk>

_____

_____

[Bassetlaw District Council] Martyn Beckett
Systems Support Officer
Bassetlaw District Council, Potter Street, Worksop, Nottinghamshire, S80 2AH
W: www.bassetlaw.gov.uk<http://www.bassetlaw.gov.uk>

_____

Martyn Beckett
Systems Support Officer

From:	[redacted]
To:	
Cc:	Planning
Subject:	RE: 24/00509/PREAPP Proposed development of a Solar Farm located in Nottinghamshire comprising up to 400MW of solar energy generation and a 200MW Battery Energy Storage System (BESS)
Date:	18 May 2024 13:15:57
Attachments:	Steeple Renewables Project Scoping Report – Archaeology Comments Bassetlaw District Council.docx ufm14_NSIP_-_Consultation.rtf

Hi Amanda

Many thanks for consulting me on this. I've attached my comments relating to archaeology for you consideration and I hope these can be added to the Council's response.

I've been recently contacted regarding a WSI for geophysical survey for this project which I've agreed as part of their assessment works. I'll keep you posted with results and the next stages, which should include trenching.

I hope this is all in order and please let me know if you have any queries.

Kind regards

Matt

Matthew Adams
Senior Historic Environment Officer
Lincolnshire County Council
County Offices, Newland, Lincoln LN1 1YL

Mobile: [redacted]
Email: [redacted]@lincolnshire.gov.uk
Teams: [redacted]
Website: www.lincolnshire.gov.uk

Lincolnshire COUNTY COUNCIL *Working for a better future*

From: Amanda Broadhead [redacted]@bassetlaw.gov.uk>
Sent: Friday, May 17, 2024 9:59 AM
To: Matthew Adams [redacted]@lincolnshire.gov.uk>
Subject: 24/00509/PREAPP Proposed development of a Solar Farm located in Nottinghamshire comprising up to 400MW of solar energy generation and a 200MW Battery Energy Storage

System (BESS)

Good morning Matthew

We requested some comments by today for us to provide the LPA's scoping opinion in regards to the above NSIP project. PINs have already confirmed that they won't extend the deadline and I have to submit the LPA's response by 21st May ….Please can you confirm whether you can provide comments under our paid service agreement?

Kind regards

Amanda Broadhead, MSc, MRTPI
Planning Officer
Development Management

Amanda Broadhead
Planning Officer
Bassetlaw District Council ,Potter Street, Worksop, Nottinghamshire, S80 2AH
W: www.bassetlaw.gov.uk

MEMO

FROM: Environmental Health Manager	**TO:** Planning Development Manager
	FAO: Ms A Broadhead
OUR REF: WK/000164038	**YOUR REF:** 24/00509/PREAPP
	DATE: 20 May 2024

SUBJECT: Proposed National Strategic Infrastructure Project Consultation from The Planning Inspectorate on Behalf of the Secretary of State for a Scoping Opinion

LOCATION: BDC - Environmental Health, Queens Buildings, Potter Street, Worksop, Nottinghamshire, S80 2AH

The Environmental Health team would like to make the following observations/comments.

To discuss any of these comments please ring 01909 533533 and ask for the relevant officer.

	Comments	**Officer**
Extraction/ Ventilation:-	No comments or observations to make.	Neighbourhood EHO (JP)
Noise:-	I would suggest that the Environmental Statement addresses the likelihood of the impact of noise on the occupiers of dwellings and operators of businesses in the vicinity of the solar project. This should identify the likely impact during the construction, operational and decommissioning phases of the proposed development. In addition to the localised impact from noise adjacent to individual properties or settlements arising from construction activities, the impact from additional construction traffic in the wider area should be included. I would like to seek assurance in the Environmental Assessment that potentially noise generating equipment, such as batteries, transformers and inverters are sited so as to minimise noise to the occupiers of dwellings/businesses, rather than for operational convenience/economy. I would suggest that the cumulative impacts on the local community of this, and the other proposed solar projects in this region, are fully considered in the Environmental Statement, and that opportunities to share infrastructure, such as cabling routes, are explored.	Neighbourhood EHO (JP)
Lighting:-	I would suggest that the Environmental Assessment addresses the likely impact of artificial lighting on the occupiers of dwellings and businesses adjacent to the proposed scheme. In particular, the assessment should consider the likely impact of temporary lighting necessary for construction activities, the lighting of site compounds and access roadways.	Neighbourhood EHO (JP)
Pollution Prevention & Control:-	Given the potential significance of these impacts, we urge the Secretary of State to ensure that a comprehensive Environmental Impact Assessment (EIA) is conducted, addressing the following specific concerns:	Pollution TO (JW)

	Dust during Construction: The construction phase is could generate dust, which could adversely affect air quality and the health of nearby residents. Measures to mitigate dust emissions, such as water spraying, dust screens, and monitoring, should be thoroughly evaluated and implemented. Noise: Construction and operational phases are likely to produce noise that could disrupt local residents. An assessment of noise levels, along with proposed mitigation strategies such as sound barriers and restricted working hours, should be included. Glare from Solar Panels: If the development includes solar panels, there is a risk of glare affecting nearby properties and road users. A detailed glare assessment, considering the positioning and angle of the panels, is essential to mitigate any adverse effects. Historic Land Contamination: The site may have a history of contaminative land use, raising concerns about existing land contamination. A thorough investigation into the extent of contamination, including soil and groundwater testing, may be necessary. Appropriate remediation plans must be developed to ensure the site is safe for its intended use. Risk of Future Land Contamination: The proposed development activities may introduce new contaminants into the environment. An evaluation of potential contamination sources and robust strategies to prevent future contamination should be an integral part of the EIA.	

Environmental Health Services

Lead Ecologists Consultation Response	
Date:	Tuesday, 21 May 2024
Planning Ref:	24/00509
Description:	Proposed National Strategic Infrastructure Project Consultation from The Planning Inspectorate on Behalf of the Secretary of State for a Scoping Opinion

Steeples Renewables Project Environmental Impact Assessment Scoping Report prepared by Pegasus has been considered when formulating this Scoping Opinion.

FURTHER DETAIL SHOULD BE PROVIDED ABOUT XXX

Scoped In

Statutory Designated Sites
No Comments.

Non-statutory Designated Sites
Further details should be provided about the scope for additional/incidental management of any of these sites as part of the management regime of the wider site.

Habitats
Further details should be provided on the seeding/planting in the Solar Areas, the timing of management (noting probable presence of nesting birds, leverets, herpetofauna etc.) and the approach towards use of chemical control of vegetation on site given the vast scale of the project and proximity to major watercourse.

Badger
Further details on protections for retained/created setts from machinery operating on site etc. during the operational phase.

Bats
Further details are required on what compensation and enhancement for bats will be made available beyond any licencing requirements. For example, it is expected that identified commuting routes will be bolstered, main foraging areas retained and enhanced, but will new roosting provisions be provided?

Birds
Proposals for the inclusion of gaps in fencing for badger are admirable however it may be prudent for ground nesting birds, such as skylark, if these gaps were not present in all sectors and larger mammals such as badger, fox and hedgehog were excluded at least from some of the mitigation areas, if not some of the solar areas as well. The losses of skylark breeding territories to the scheme are substantial and clarification on exactly what bespoke compensation for this red listed species will be provisioned is needed.

Noted that access wasn't possible to the proposed Eastern Mitigation Area, and this will be surveyed in 2024. Further details of which species breed here is needed and further information on what if any improvements can be made to this habitat for it to be a 'Mitigation Area'.

Further details are required on the Habitat Management and Monitoring Plan for the whole site and how this will consider nesting birds (this will likely also have beneficial effects on other species). Although much research pertains to skylark in Solar Farms, other species such as meadow pipit, linnet etc. may be prevalent and nest in the sward in and around panels.

Great crested newts
Further details on the mitigation and compensation for this species are required.

Water vole
Further details on the mitigation and compensation for this species are required.

Otter
No comment.

Reptiles
Further details on the mitigation and compensation for these species is required. It would be unfortunate to see these species scoped out when opportunities exist to bolster local populations and provide enhanced landscape connectivity.

Terrestrial invertebrates
Further details on enhancements for these species is required.

Aquatic invertebrates
The separation between the solar areas and the River Trent is very much welcomed given the research into solar farms and Ephemeroptera etc.

Other SPI mammal species
No comment.

In combination effects
Several other proposed solar developments similar in scope and scale and in proximity to or even bounding the site are emerging and these will doubtless be considered. Further details are required on communication between project teams and how habitat connectivity across these sites will be achieved. A lack of coherent connection between significant landscape features on the sites will represent a substantial loss for biodiversity in the region and ecology as a profession.

Scoped Out

Hazel dormouse
No comment.

Steeple Renewables Project Scoping Report – Archaeology Comments Bassetlaw District Council

The Environmental Impact Assessment scoping report for the Steeple Renewables Project sets out the proposed approach regarding cultural heritage and archaeology at Chapter 10. I generally support the outline approach presented, however the following comments should be addressed as the pre-application assessment proceeds.

The proposed site is very large, covering 943.4ha in an area of known high archaeological potential. This includes an extensive Roman landscape of towns (including the scheduled monument *Segelocum*) and smaller settlements along the main Roman road between Lincoln and Doncaster (Margery 28a). This formed part of the main, national north-south road network between London and York and bypassed the unreliable ferry crossing across the Humber estuary on Ermine Street. It was a high traffic road with extensive remains associated with settlement, villas, farming and industry extending some distance either side. Archaeological work in the area has identified numerous previously unknown sites of significance associated with it. There is also significant potential for prehistoric through to medieval activity throughout the proposed site.

The Environmental Impact Assessment (EIA) will require desk-based research, non-intrusive surveys, and intrusive field evaluation for the full extent of proposed impact. The results should be used to minimise the impact on the historic environment through informing the project design and an appropriate programme of archaeological mitigation. The provision of sufficient baseline information to identify and assess the impact on known and potential heritage assets is required by Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (Regulation 5 (2d)), National Planning Statement Policy EN1 (Section 5.8), National Planning Statement Policy EN3 (Section 2.10.107-119), and the National Planning Policy Framework.

The full potential impact zone including in-scope cable connection corridors will require geophysical survey to provide an initial assessment of the site-specific archaeological potential and to inform a robust programme of archaeological trial trenching and subsequent post-consent mitigation. Pre-determination evaluation of the cable connection corridors can be very useful with informing a decision on the most cost effective and viable route.

The scoping report recognises the extensive and diverse range for archaeological remains within the site boundary and acknowledges the potential for direct and damaging impacts from the proposed development (Section 10.4.4).

However, it seeks to present a narrative of low impact, which is often presented with solar farm development. This is inaccurate and the cumulative effect of piling, kilometres of cable trenching, landscaping, construction activity and the likely disturbance from numerous refits and decommissioning will be substantial and very damaging to any surviving archaeological remains, both known and as yet unknown. The developmental impacts will be on a similar scale to any other large-scale development.

The scoping report makes provision for a full desk-based assessment (DBA), geophysical survey of the full site boundary (Section 10.5.13) which is welcomed. However, these techniques alone are

insufficient to properly identify and understand archaeological potential and significance. A programme of evaluation trenching to cover a minimum of 3% of the order limits will be necessary to properly identify and characterise the archaeological resource within the site. This is necessary to inform the cultural heritage chapter of the Environmental Statement (ES) and the DCO application.

Trenching results are essential for effective risk management and to inform project viability, programme scheduling and budget management. Failing to do so could lead to unnecessary destruction of heritage assets, potential programme delays or viability issues, and excessive cost increases that could otherwise be avoided. I welcome the opportunity to discuss this with the applicant as set out in Section 10.5.15.

I welcome the applicant's intention to present an outline mitigation strategy with their DCO application (Section 10.7.2). The strategy will necessarily be based upon the results of the evaluation work outlined above.

I also welcome the proposal to enhance public understanding of the local heritage following the results of the archaeological work associated with the project (Section 10.7.3). This will provide significant public benefit through heritage outreach work in the local community.

From: [redacted]
To: Planning
Subject: Steeple Renewables Project
Date: 16 May 2024 08:51:59

Dear Sir/Madam,

Clarborough & Welham Parish Council has discussed its response to the consultation about the Steeple Renewables Project. It has written to express its opposition to the project on the grounds it will reduce the number of permanent jobs and reduce the size of the local economy. It will also reduce the biodiversity of the land.

The Parish Council considered there should be a clear position from the Bassetlaw District Planning Department and Council which sets out criteria for where solar panels on a commercial scale are welcome. The Parish Council does not consider rural locations with developed farming and with access to attractive amenities for residents and visitors - which apply throughout our parish - are in any way suitable for this development.

We suggest establishing a policy with clear criteria will stop unwelcome developments and encourage developments in locations where the impact will be beneficial.

Yours faithfully

Mrs Davies
Parish Clerk
on behalf of Clarborough & Welham Parish Council

From: [redacted]
CC: Planning
Subject: 24-00509-PREAPP - Steeple Renewables Project - Conservation comments
Date: 21 May 2024 15:32:59
Attachments: image001.png
image002.png

PINS/Amanda

Heritage assets
The proposal area and its surroundings include a range of heritage assets of varied levels of significance. Within Bassetlaw, this includes 1 Scheduled Ancient Monument (SAM) within the boundary at Littleborough and a further SAM just outside (West Burton), a large number of Listed Buildings (LBs), non-designated heritage assets (NDHAs), 1 unregistered park & garden (Habblesthorpe Churchyard – see here), and 2 Conservation Areas (CAs) at Wheatley and Saundby.

There is also a complex network of unscheduled archaeology across the entire site (I defer to the views of the Lincolnshire/Nottinghamshire County Council archaeologists on that matter).

Outside of Bassetlaw, on the east side of the river in Lincolnshire, are a further set of designated and non-designated heritage assets including SAMs, LBs and NDHAs.

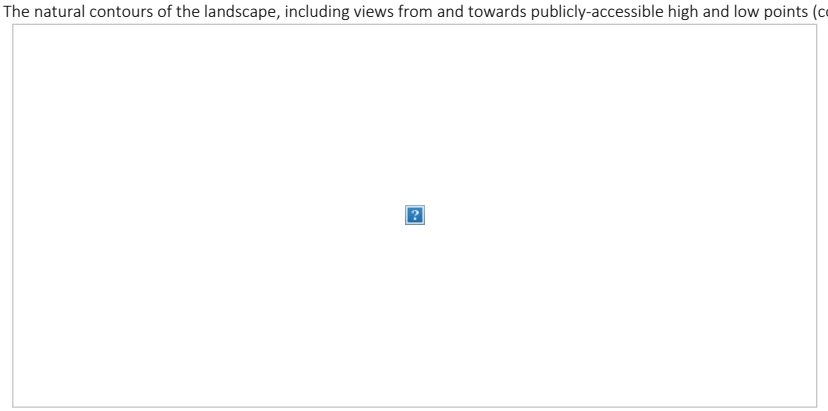
Littleborough SAM
Of particular concern is the inclusion of the **Littleborough Scheduled Ancient Monument** within the site area. This should be **removed** from the proposal at the earliest stage possible. A solar farm development would undoubtedly cause **substantial harm** if located directly on top of a SAM. The public benefits of solar development could be met on alternative, less heritage-sensitive sites in the wider area.

Conservation would also draw attention to paragraph 10.4.4, which states that for the development phase: *"There is the potential that if archaeological remains are found to exist within the Site, that the Proposed Development would cause some harm to these. However…it is considered that this would not result in a significant effect upon non-designated archaeological assets"*. This is incorrect, especially in close proximity to the SAMs and the Roman Road through Sturton le Steeple and Littleborough.

Desktop study
For the forthcoming desktop study, a 3km radius is proposed for designated heritage assets and a 1km radius for non-designated heritage assets. Conservation is broadly in agreement with this suggestion, although would request that exceptions are made for those taller and higher grade Listed Buildings nearby (especially Medieval churches). The setting of North Leverton Windmill also goes beyond the 3km distance, so impact upon that wide setting needs additional consideration.

Photographic study
A photographic viewpoints study will be required which takes into account the following:

- The setting of all heritage assets in the study area (note that 'setting' is much more than the visibility or otherwise of an asset; it also includes the wider experience of landscape, the built/natural environment and other such features);
- Key viewpoints along public highways and public rights of way;
- The natural contours of the landscape, including views from and towards publicly-accessible high and low points (contour map below).



- The impact of existing landscape screening including tree belts/clumps and hedgerows.

Data sources
For paragraph 10.5.7, I would suggest adding the 'Bassetlaw Heritage Mapping' web page to the list of data sources: https://www.bassetlaw.gov.uk/planning-and-building/planning-services/conservation-and-heritage/bassetlaw-heritage-mapping/. From this page, an up-to-date list of all heritage assets in Bassetlaw is available, together with a description of each non-designated heritage asset, a statement of significance for each unregistered park & garden, and a designation statement for each Conservation Area.

I trust these comments are of use. I would be happy to provide more detailed comments on particular sites if this is of use.

I look forward to receiving a consultation on the next stage of the proposal.

Regards, Michael

signature (work), 10 pc

Michael S. A. Tagg BA (Hons), MSc, IHBC
Conservation Manager
Planning Services
Bassetlaw District Council
Queens Buildings
Potter Street
Worksop

Nottinghamshire
S80 2AH

Tel: 01909 533427
[redacted]

You will appreciate that the above comments are made at officer level only and do not prejudice any decision taken at a later date by the Council.

Michael Tagg
Conservation Manager
Bassetlaw District Council, Potter Street, Worksop, Nottinghamshire, S80 2AH
W: www.bassetlaw.gov.uk

Bassetlaw DISTRICT COUNCIL
North Nottinghamshire

Ian Wallis – EIA Advisor
Planning Inspectorate
Environmental Services
Central Operations
Temple Quay House
2 The Square
Bristol
BS1 6PN
SteepleRenewables@planninginspectorate.gov.uk.

Our Ref: 24/00509/PREAPP
Please ask for: Amanda Broadhead
Email: planning@bassetlaw.gov.uk
21st May 2024

Dear Ian

Location	Located on an area of agricultural land to the east and west of Sturton le Steeple and south of West Burton Power Station
Proposal	Scoping Opinion – The Proposed Development is for an electricity generating station with a capacity over 50 megawatts (MW), comprising the installation of a ground mounted solar photovoltaic (PV) electricity generation with an approximate capacity of 400 MW of energy generation and associated development comprising 200 MW of energy storage, grid connection infrastructure and all other infrastructure integral to the construction, operation and maintenance of the Scheme including access

Thank you for your letter dated 23rd April 2024 requesting an Environmental Impact Assessment (EIA) scoping opinion for the above development proposal.

The District Council acknowledges the request for an Environmental Impact Assessment Scoping Assessment under the terms of Regulation 15 of the Town and Country Planning (Environmental Health Impact Assessment) Regulations 2017(as amended), in relation to proposed development outlined above.

The proposed development is not outlined in Schedule 1 of the Regulations.

In terms of Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 the proposed development falls within the following description:

3 – Energy Industry

a) Industrial installations for the production of electricity, steam and hot water.

The threshold outlined in Schedule 2 for this type of development is 0.5ha.

The proposed development site measures 943.4 hectares (ha) (2330.25 acres) and is located approximately 5km south of Gainsborough and would allow for an electricity generating station with a capacity over 50 megawatts (MW), comprising the installation of a ground mounted solar photovoltaic (PV) electricity generation with an approximate capacity of 400 MW of energy generation and associated development comprising 200 MW of energy storage, grid connection infrastructure and all other infrastructure integral to the construction, operation and maintenance of the Scheme including access.

The site therefore exceeds the threshold as outlined in Schedule 2 of the Regulations.

Whilst no formal screening opinion was submitted to the Local Planning Authority, the applicant has undertaken their own screening opinion which concluded that an Environmental Impact Assessment is required for the proposed development. The Council is in agreement to this approach.

The purpose of the Environmental Impact Assessment, is to establish the nature of the development and the environment in which it is to take place during the construction and operational phases, to identify likely significant effects on the environment that may arise. The EIA regulations require that any development falling within the description of Schedule 2 development will be subject to an Environmental Impact Assessment, where the development is likely to have significant effects on the environment by virtue of such factors as its nature, size or location.

Obviously the proposed Environmental Statement will need to contain the general principles set out in Schedule 4 of the Town and County Planning (Environmental Impact Assessment) Regulations.

The purpose of the submitted scoping report is to establish the following:

1. Identify the nature of the proposed development including its purpose, physical characteristics, land use requirements and any alternatives that have been considered
2. Identify and describe the key environmental topics that the EIA proposes to consider
3. Identify any environmental topics that are not relevant to the EIA and if these are proposed to be scoped out
4. Define the extent to which the key environmental topics need to be investigated and the methodology for assessment; and
5. Enable and initiate preliminary consultation with stakeholders

I will address the above in turn.

Identify the nature of the proposed development including its purpose, physical characteristics, land use requirements and any alternatives that have been considered

It is considered that the nature of the proposed development including its purpose, physical characteristics and land use requirements have been set out in the submitted scoping report.

The ES also acknowledges that the Council submitted the Bassetlaw Local Plan to the Secretary of State on the 18 July 2022. Following an independent examination, the Council received the Inspector's Report on the 21 February 2024. The report confirms that, subject to main modifications, the Local Plan is sound and can proceed to adoption. The report will be considered by Full Council later in 2024. It follows that the policies within the Draft Local Plan

can be afforded significant weight. Reference is made to the Sturton Ward neighbourhood plan this is given significant weight but is now under review and this has resulted in the designation of the following new neighbourhood areas:

North Leverton and Habblesthorpe
North and South Wheatley
Sturton Le Steeple, Bole and West Burton

The new designations do not change the validity of the existing Sturton Ward Neighbourhood Plan but will allow it to be replaced by three separate neighbourhood plans in due course.

Clarborough Neighbourhood Plan (Referendum held on 2 February 2017) is also relevant to this proposal. Please also find a copy of Clarborough and Welham Parish Council attached to this response.

Cumulative and Combined Effects

It is considered that there are some developments missing from the list that have been provided in the scoping report and the applicant's attention is brought to the following link which sets out the relevant energy developments in the District. From here the applicant will be able to see which ones will need to be considered for this Environmental Statement.

Energy developments | Bassetlaw District Council

It should also be noted that The One Earth Solar Farm is at pre-application stage and is absent when discussing cumulative impacts and listing NSIP projects in Bassetlaw District Council's Authority. The Council wishes to highlight the potential for significant cumulative effects with other National Significant infrastructure Projects (NSIP). The applicant should take into consideration the geographical scale if the NSIP projects in Nottinghamshire and Lincolnshire in combination and consequently the scale of the study area that will be necessary to identify the full extent of the development and the potential significant cumulative impacts which could occur over a geographical area. It is noted that a study area for the ES has not been identified in the ES to date.

Proposed topics to be scoped in and out of the assessment and methodologies

The submitted scoping report lists a comprehensive list of the topics to be scoped in and scoped out. The proposed approach to the EIA is broadly agreed. Please see comments made by Bassetlaw District Council and the consultees on the proposed topics to be included in the ES.

Chapter 7 Landscape and Visual Impact and Residential Amenity

It is agreed that landscape and visual effects shall be assessed separately. Again cumulative landscape and visual effects have not been addressed within the scoping report. Cumulative Landscape and visual effects with other schemes should be assessed as the project progresses, particularly in regards other NSIP or renewable energy projects. The report identifies the site as relatively flat agricultural landscape. The visual assessment should take account of the worst case scenario in terms of winter views and effects associated with landscape mitigation at the operational phase (year 1), residual phase with planting having established (typically 15 years) and at the decommissioning phase.

The LVIA should ensure that all elements associated with the development are considered and assessed, such as battery storage systems and boundary fencing, which may be more visible than the panels due to height and mass.

The District Council's Environmental Health Officer has been consulted and we require the following comments to be considered:

Noise

"It is suggest that the Environmental Statement addresses the likelihood of the impact of noise on the occupiers of dwellings and operators of businesses in the vicinity of the solar project. This should identify the likely impact during the construction, operational and decommissioning phases of the proposed development. In addition to the localised impact from noise adjacent to individual properties or settlements arising from construction activities, the impact from additional construction traffic in the wider area should be included. I would like to seek assurance in the Environmental Assessment that potentially noise generating equipment, such as batteries, transformers and inverters are sited so as to minimise noise to the occupiers of dwellings/businesses, rather than for operational convenience/economy. It is suggested that the cumulative impacts on the local community of this, and the other proposed solar projects in this region, are fully considered in the Environmental Statement, and that opportunities to share infrastructure, such as cabling routes, are explored.

Lighting

It is suggested that the Environmental Assessment addresses the likely impact of artificial lighting on the occupiers of dwellings and businesses adjacent to the proposed scheme. In particular, the assessment should consider the likely impact of temporary lighting necessary for construction activities, the lighting of site compounds and access roadways.

Pollution and Prevention Control

Given the potential significance of these impacts, we urge the Secretary of State to ensure that a comprehensive Environmental Impact Assessment (EIA) is conducted, addressing the following specific concerns:

Dust during Construction: The construction phase is could generate dust, which could adversely affect air quality and the health of nearby residents. Measures to mitigate dust emissions, such as water spraying, dust screens, and monitoring, should be thoroughly evaluated and implemented. Noise: Construction and operational phases are likely to produce noise that could disrupt local residents. An assessment of noise levels, along with proposed mitigation strategies such as sound barriers and restricted working hours, should be included. Glare from Solar Panels: If the development includes solar panels, there is a risk of glare affecting nearby properties and road users. A detailed glare assessment, considering the positioning and angle of the panels, is essential to mitigate any adverse effects. Historic Land Contamination: The site may have a history of contaminative land use, raising concerns about existing land contamination. A thorough investigation into the extent of contamination, including soil and groundwater testing, may be necessary. Appropriate remediation plans must be developed to ensure the site is safe for its intended use. Risk of Future Land Contamination: The proposed development activities may introduce new contaminants into the environment. An evaluation of potential contamination sources and robust strategies to prevent future contamination should be an integral part of the EIA".

Chapter 8 Ecology and Biodiversity

The Council's Lead Ecologist has commented the following:

Scoped In
Statutory Designated Sites - No Comments.

Non-statutory Designated Sites
Further details should be provided about the scope for additional/incidental management of any of these sites as part of the management regime of the wider site.

Habitats
Further details should be provided on the seeding/planting in the Solar Areas, the timing of management (noting probable presence of nesting birds, leverets, herpetofauna etc.) and the approach towards use of chemical control of vegetation on site given the vast scale of the project and proximity to major watercourse.

Badgers
Further details on protections for retained/created setts from machinery operating on site etc. during the operational phase.

Bats
Further details are required on what compensation and enhancement for bats will be made available beyond any licencing requirements. For example, it is expected that identified commuting routes will be bolstered, main foraging areas retained and enhanced, but will new roosting provisions be provided?

Birds
Proposals for the inclusion of gaps in fencing for badger are admirable however it may be prudent for ground nesting birds, such as skylark, if these gaps were not present in all sectors and larger mammals such as badger, fox and hedgehog were excluded at least from some of the mitigation areas, if not some of the solar areas as well. The losses of skylark breeding territories to the scheme are substantial and clarification on exactly what bespoke compensation for this red listed species will be provisioned is needed.

Noted that access wasn't possible to the proposed Eastern Mitigation Area, and this will be surveyed in 2024. Further details of which species breed here is needed and further information on what if any improvements can be made to this habitat for it to be a 'Mitigation Area'.

Further details are required on the Habitat Management and Monitoring Plan for the whole site and how this will consider nesting birds (this will likely also have beneficial effects on other species).

Although much research pertains to skylark in Solar Farms, other species such as meadow pipit, linnet etc. may be prevalent and nest in the sward in and around panels.

Great crested newts
Further details on the mitigation and compensation for this species are required.

Water vole
Further details on the mitigation and compensation for this species are required.

Otter
No comment.

Reptiles

Further details on the mitigation and compensation for these species is required. It would be unfortunate to see these species scoped out when opportunities exist to bolster local populations and provide enhanced landscape connectivity.

Terrestrial invertebrates
Further details on enhancements for these species is required.

Aquatic invertebrates
The separation between the solar areas and the River Trent is very much welcomed given the research into solar farms and Ephemeroptera etc.

Other SPI mammal species
No comment.

In combination effects
Several other proposed solar developments similar in scope and scale and in proximity to or even bounding the site are emerging and these will doubtless be considered.

Further details are required on communication between project teams and how habitat connectivity across these sites will be achieved. A lack of coherent connection between significant landscape features on the sites will represent a substantial loss for biodiversity in the region and ecology as a profession.

Scoped Out
Hazel dormouse - No comment.

Chapter 10 Cultural Heritage

It is noted that the Heritage chapter will consider all aspects of the historic environment, comprising archaeology, built heritage and the historic landscape, both designated and non-designated.

Bassetlaw District Council's Conservation Manager will be sending comments on directly for consideration.

Buried Heritage

The Senior Historic Environment Officer at Lincolnshire County Council has provided the Council with comments and the detailed comments are below:

The Environmental Impact Assessment scoping report for the Steeple Renewables Project sets out the proposed approach regarding cultural heritage and archaeology at Chapter 10. I generally support the outline approach presented, however the following comments should be addressed as the pre-application assessment proceeds.

The proposed site is very large, covering 943.4ha in an area of known high archaeological potential. This includes an extensive Roman landscape of towns (including the scheduled monument *Segelocum*) and smaller settlements along the main Roman road between Lincoln and Doncaster (Margery 28a). This formed part of the main, national north-south road network between London and York and bypassed the unreliable ferry crossing across the Humber estuary on Ermine Street. It was a high traffic road with extensive remains associated with settlement, villas, farming and industry extending some distance either side. Archaeological work in the area has identified numerous previously unknown sites of significance associated

with it. There is also significant potential for prehistoric through to medieval activity throughout the proposed site.

The Environmental Impact Assessment (EIA) will require desk-based research, non-intrusive surveys, and intrusive field evaluation for the full extent of proposed impact. The results should be used to minimise the impact on the historic environment through informing the project design and an appropriate programme of archaeological mitigation. The provision of sufficient baseline information to identify and assess the impact on known and potential heritage assets is required by Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (Regulation 5 (2d)), National Planning Statement Policy EN1 (Section 5.8), National Planning Statement Policy EN3 (Section 2.10.107-119), and the National Planning Policy Framework.

The full potential impact zone including in-scope cable connection corridors will require geophysical survey to provide an initial assessment of the site-specific archaeological potential and to inform a robust programme of archaeological trial trenching and subsequent post-consent mitigation. Pre-determination evaluation of the cable connection corridors can be very useful with informing a decision on the most cost effective and viable route.

The scoping report recognises the extensive and diverse range for archaeological remains within the site boundary and acknowledges the potential for direct and damaging impacts from the proposed development (Section 10.4.4).

However, it seeks to present a narrative of low impact, which is often presented with solar farm development. This is inaccurate and the cumulative effect of piling, kilometres of cable trenching, landscaping, construction activity and the likely disturbance from numerous refits and decommissioning will be substantial and very damaging to any surviving archaeological remains, both known and as yet unknown. The developmental impacts will be on a similar scale to any other large-scale development.

The scoping report makes provision for a full desk-based assessment (DBA), geophysical survey of the full site boundary (Section 10.5.13) which is welcomed. However, these techniques alone are insufficient to properly identify and understand archaeological potential and significance. A programme of evaluation trenching to cover a minimum of 3% of the order limits will be necessary to properly identify and characterise the archaeological resource within the site. This is necessary to inform the cultural heritage chapter of the Environmental Statement (ES) and the DCO application.

Trenching results are essential for effective risk management and to inform project viability, programme scheduling and budget management. Failing to do so could lead to unnecessary destruction of heritage assets, potential programme delays or viability issues, and excessive cost increases that could otherwise be avoided. I welcome the opportunity to discuss this with the applicant as set out in Section 10.5.15.

I welcome the applicant's intention to present an outline mitigation strategy with their DCO application (Section 10.7.2). The strategy will necessarily be based upon the results of the evaluation work outlined above.

I also welcome the proposal to enhance public understanding of the local heritage following the results of the archaeological work associated with the project (Section 10.7.3). This will provide significant public benefit through heritage outreach work in the local community.

The Council have concerns that there has been a lack of evaluation to inform the site selection. Failure to undertake a significant evaluation may lead to significant construction delays as well as unnecessary destruction of heritage assets and consent may be given to a scheme that is undeliverable in terms of information submitted with the application.

Chapter 11 Socio Economics

The contents of this chapter are noted, the effects to be scoped into the assessment are broadly agreed with. However an emphasis for employing local people and significant benefits to the local economy and communities during and after the construction period would be welcomed.

Chapter 14 Transport and Access

We are not in receipt of the County Council's Highway Authority comments. If these are forthcoming then they will be forwarded on at a later date. The proposed approach to the EIA is broadly agreed and it is noted that the proposal will be supported by a Construction Traffic Management Plan (CTMP) to consider traffic movements anticipated throughout the construction period and the associated mitigation measures to be agreed with the LHA at Nottinghamshire County Council (NCC). A Transport Assessment/ Transport Statement and Decommissioning Traffic Management Plan will also be agreed upon with NCC as LHA for the site location in due course.

It is noted that the construction traffic will require access through unclassified roads and the roads leading to the site may not be suitable to accommodate the anticipated construction vehicle movements and traffic this will require careful consideration and assessment in the ES.

Chapter 16 Agricultural Land

The land within the Site is currently in agricultural use mainly in arable use which some areas of pastoral farming. It is noted that according to Natural England's Provisional Agricultural Land Classification (ALC) Map66 the majority of the site is located within Grade 3 agricultural land with the eastern boundary of the site located within Grade 4 agricultural land. Within the wider surrounding area around the site to the north the land is classed Grade 2 land and to the west, south and east the land is classed Grade 3 land. It is noted that in order to provide a breakdown of the subgrade for the Grade 3 land, an agricultural land classification survey will be carried out. It is disappointing that this work has not been carried out yet given that the loss of agricultural land could be significant factor with regards to considering the site selection stage as the Council wishes solar arrays and other built infrastructure located in areas that are not classified as best and most versatile (BMV) land.

Chapter 17 Glint and Glare

It is recommended that survey work includes the impact on Robin Hood Airport although this is not operational but there are plans to potential re-open this. Consideration should also be given to the impacts from glint and glare on the users of the PROWS.

Other matters

Waste

Consideration should be given to the impact of waste generated from the construction /decommissioning phase and or end of life solar arrays requiring replacement in terms of how and where it is disposed of and transportation away from the site. There are other solar schemes in the area that are operating on similar time scales therefore there is the potential for significant amounts of waste if this is not carefully considered.

Risk of Major Accidents and Disasters

It is noted that this has been scoped out of the ES and that the proposed Development is not considered to be vulnerable to or give rise to significant impacts in relation to the Risk of Accidents and Major Disasters. A Fire Risk Statement relating to the BESS would be submitted as part of the application, and therefore the matter of fire prevention and safety would be covered appropriately outside of the ES.

There is an overlap on this matter with some of the ES topics and it is accepted that appropriate measures and controls could be achieved in line with the relevant legislation and processes to minimise risks to human and environmental receptors. Notwithstanding this comments from the Fire Authority are attached to this response.

.A full round of consultation has been undertaken in respect of the submitted scoping report and it is considered that this approach is acceptable based on the very limited consultation comments that have been received to date (some responses have not yet been received; however if these do come back I will of course forward them onto you).

The submitted scoping report does acknowledge that a series of technical reports will be required to accompany the planning application and therefore I attach a copy of the consultation responses that have been received so that these can inform your future submission, these have been received from the following bodies:

Fire Authority
Coal Authority
Bassetlaw District Council – Lead Ecologist
Bassetlaw District Council - Environmental Health
Senior Historic Environment Officer at Lincolnshire County Council
Clarborough & Welham Parish Council
Natural England

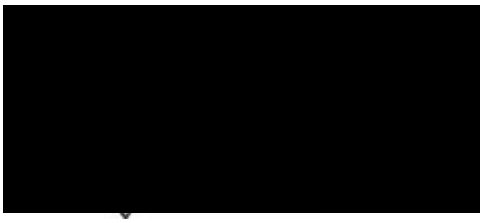
In terms of the topics proposed to be scoped in the Local Planning Authority is generally in agreement with these and comments are made as follows:

Enable and initiate consultation

The Council has undertaken consultation on this scoping opinion and the received responses are attached to this letter which outline the main consultees and their details. There are a number of consultations outstanding and the Council will forward a copy of these responses if they are forthcoming. The Council is happy to facilitate meetings with any consultee as the applicant feels is necessary.

This forms the Council's formal scoping opinion under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

Yours sincerely



John Krawczyk
Development Team Manager

Your Ref:
Our Ref: 24/00211/NCO
Case Officer: Mr Chris Whitmore
Telephone: 01246 242294
E-mail – dev.control@bolsover.gov.uk
Date: 13th May 2024.

Chris Whitmore MRTPI
Development Management and Land Charges Manager

Ian Wallis (EIA Adviser) – by email: SteepleRenewables@planninginspectorate.gov.uk

REFERENCE NO :	24/00211/NCO
APPLICANT :	Lucy Hicks
DEVELOPMENT :	Steeple Renewables Project
LOCATION :	Land at Sturton le Steeple
CASE OFFICER:	Mr Chris Whitmore

Dear Mr Wallis,

Thank you for consulting the District Council on the scoping request that you have received in respect of the above project.

Having regard to the location of the site (Land at Sturton le Steeple), it is not considered that the development will have any environmental impacts that will affect Bolsover District to the extent that it would wish to comment on the information to be provided in the Environmental Statement.

Yours sincerely,

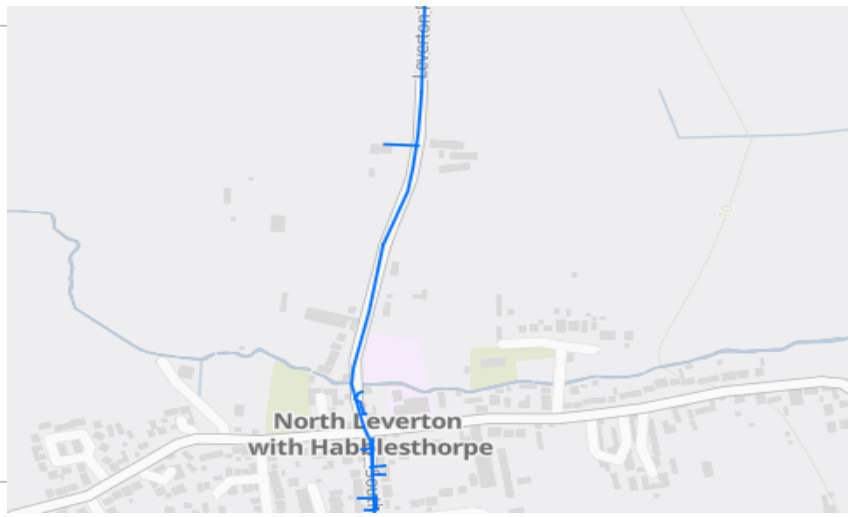
[redacted]
Development Management and Land Charges Manager

From: [redacted]
To: Steeple Renewables Project
Subject: RE: [EXT] EN010163 – Steeple Renewables Project – EIA Scoping Notification and Consultation
Date: 24 April 2024 10:03:58
Attachments: image001.png

Hello.

Thank you for the below and attached.

I believe I have reviewed the proposed scheme boundary. I understand there are no Cadent interactions with the current Red Line Boundary, however there is a close interaction with a medium pressure pipe in Leverton road, north of North Leverton, see below. I can see from the Plan I was able to find on line to see if the scheme effects the highway.



On a separate note, the addition of a clearly accessible Red Line Boundary for the scheme and other EIA scoping reports would help process these schemes. As you can imagine there are a large number of DCO projects we need to review. It is common that a lot of time is spent looking for a useable plan to review the scheme, which was the case for this scheme.

Please keep Cadent informed if there are any chances to the Red Line Boundary in the future.

Kind regards

Toby

From: Steeple Renewables Project <SteepleRenewables@planninginspectorate.gov.uk>
Sent: 23 April 2024 18:43
To: Feirn, Toby [redacted]@cadentgas.com>; .box.Landservicesworkrequest.GD16 <LandServices@cadentgas.com>
Cc: Steeple Renewables Project <SteepleRenewables@planninginspectorate.gov.uk>
Subject: [EXT] EN010163 – Steeple Renewables Project – EIA Scoping Notification and Consultation

FAO: Mr Toby Feirn, Planning and consents specialist.

Dear Mr Feirn
Please see attached correspondence on the proposed Steeple Renewable Energy.
Please note the deadline for consultation responses is **21 May 2024** which is statutory requirement that cannot be extended.
Kind regards

Lucy Hicks
EIA & Land Rights Advisor
Environmental Services Team
Major Casework Directorate
The Planning Inspectorate, 3M Kite, Temple Quay, Bristol, BS1 6PN

Helpline: 0303 44 5000
Email: lucy.hicks@planninginspectorate.gov.uk
Web: https://infrastructure.planninginspectorate.gov.uk/ (National Infrastructure Planning)
Web: www.gov.uk/government/organisations/planning-inspectorate (The Planning Inspectorate)
Twitter: @PINSgov
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Canal & River Trust
Making life better by water

Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol BS1 6PN

Your Ref EN010163

Our Ref IPP - 226

Thursday 16 May 2024

Dear Sir/Madam

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11. Scoping consultation- application by Renewable Energy Solutions (RES) (the Applicant) for an Order granting Development Consent for the Steeples Renewables Project (the Proposed Development).

Thank you for your consultation.

We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Trust is a prescribed consultee in the Nationally Significant Infrastructure Projects (NSIPs) process.

The Trust has reviewed the Scoping Report, and we note that the Indicative Parameters Plan at Figure 1.2 shows that the site boundary adjoins the River Trent for approximately 3km running north from Littleborough. The Trust is Navigation Authority for the River Trent and also has freehold landowner interests with respect to the riverbed. The river is classified as a commercial waterway and can accommodate large freight carriers as well as smaller vessels.

The eastern part of the site alongside the River Trent is identified as an area of biodiversity mitigation and proposed pv panels and associated infrastructure are shown to be approximately 550-600m away from the river at their nearest. We note that there is no requirement for any cable crossing over or under the river.

Section 8 of the Scoping Report discusses Ecology and Biodiversity and indicates that appropriate ecological mitigation, compensation and enhancement measures will be identified within the Environmental Statement, including the provision of biodiversity mitigation areas along both the eastern and western boundaries of the site. It is stated that there is intended to be engagement and consultation with relevant stakeholders from the scoping stage onwards in relation to the scope of study for ecology and to identify appropriate biodiversity mitigation and enhancements for the proposed development. We recommend that this engagement should include discussions with the Canal & River Trust in relation to proposed planting in the eastern boundary biodiversity mitigation area alongside the River Trent.

Section 9 of the Scoping Report discusses flood risk and drainage matters. We recommend that the Environmental Statement should consider whether the proposed development would result in any changes in drainage to the River Trent. If any likely increases in surface water runoff/discharge to the river are expected to occur, it will be important to consider whether these are likely to have any effect on navigation on the river. For example, new or increased flows from outfalls can affect passing boat traffic depending on the angle and strength of flow.

Canal & River Trust
Fradley Junction, Alrewas, Burton-upon-Trent, Staffordshire DE13 7DN
T 0303 040 4040 E canalrivertrust.org.uk/contact-us W canalrivertrust.org.uk

Section 14 of the Scoping Report discusses transport and access and solely considers options for construction traffic accessing the site by road. We suggest that the Environmental Statement should consider whether there is potential to utilise the River Trent (as a commercial waterway) for transportation of materials to the site and whether this does or does not represent a feasible alternative to transport by road.

Section 17 of the Scoping Report discusses the potential effects of the development arising from glint and glare. The report does not identify the River Trent as a potential receptor to be considered in a Glint and Glare Assessment. We acknowledge that the sites for the panels are set well away from the River Trent and their location and the local topography (particularly the presence of a raised flood bank) suggest that they are unlikely to be visible from the river. However, notwithstanding the distance between the panels and the river, the Environmental Statement should consider whether glint and glare impacts to river users are likely to occur. The River Trent is a navigable waterway which is also designated as a commercial waterway carrying freight. It is therefore important that visual impacts (including impacts from glint and glare) on the river do not result in any harm to navigational safety. Whilst we do not necessarily expect there to be any significant impact on the river or river users, we do therefore consider that this matter should be addressed in the Glint and Glare Assessment so that it can clearly demonstrate whether any impacts are likely and, if so, to what extent.

Please do not hesitate to contact me with any queries you may have.

Yours sincerely,

Ian Dickinson MRTPI
Area Planner
[redacted]@canalrivertrust.org.uk
[redacted]

https://canalrivertrust.org.uk/specialist-teams/planning-and-design

From: [redacted]
To: Steeple Renewables Project
Subject: City of Doncaster Council response to EIA Scoping Opinion
Date: 25 April 2024 14:45:54

You don't often get email from [redacted]@doncaster.gov.uk. Learn why this is important

Dear Sir/Madam

Having considered the content of the report I can confirm that we do not have any comments to make on the submission.

Yours faithfully

Roy Sykes
Head of Service (Planning)
Directorate of Place
City of Doncaster Council
Address: Civic Office, Waterdale, Doncaster, DN1 3BU
E-mail: [redacted]@doncaster.gov.uk
Website: www.doncaster.gov.uk

cdc grey

From:	[redacted]
To:	Steeple Renewables Project
Subject:	EN010163 - Steeple Renewables Project - EIA Scoping Notification and Consultation
Date:	15 May 2024 17:47:35

Dear Ms Hicks

EN010163 - Steeple Renewables Project

The Clarborough & Welham Parish Council consider the proposed solar farm to be detrimental in two main respects:

1) There will be a loss of permanent jobs in farming and all the industries that support the farming on the land. The local economy will be weaker and smaller as a result.

2) There will be an adverse impact on the environment with a significant reduction in the diversity of plants and other beneficial elements of farming which is replaced by solar panels.

On these grounds the Parish Council oppose the development.

The Parish Council is surprised that prime agricultural land is threatened by this type of development to be taken out of use.

Yours faithfully

Mrs Davies
Parish Clerk
on behalf of Clarborough & Welham Parish Council

The Coal Authority

200 Lichfield Lane
Mansfield
Nottinghamshire
NG18 4RG

T: 01623 637 119 (Planning Enquiries)

E: planningconsultation@coal.gov.uk

W: www.gov.uk/coalauthority

For the attention of: Lucy Hicks
Bassetlaw District Council

[By email: lucy.hicks@planninginspectorate.gov.uk]

9 May 2024

Dear Lucy Hicks

Re: EN010163

Application by Renewable Energy Solutions (RES) (the Applicant) for an Order granting Development Consent for the Steeple Renewables Project (the Proposed Development); LAND AT, STURTON LE STEEPLE, NOTTINGHAMSHIRE

Thank you for your notification of 23 April 2024 seeking the views of the Coal Authority on the above.

The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

We have reviewed the site location plan provided and can confirm that the site falls within the Coal Authority's defined Development Low Risk Area. On this basis we have no specific comments to make.

However, in the interest of public safety, it is requested that the Coal Authority's Standing Advice note is drawn to the applicant's attention, where relevant.

Yours

The Coal Authority Planning Team

From: [redacted]
To: Steeple Renewables Project
Subject: RE: EN010163 – Steeple Renewables Project – EIA Scoping Notification and Consultation
Date: 24 April 2024 08:42:26
Attachments: ~WRD2854.jpg

Morning,

As this site is over 40 miles away from Derby city I have no points of substance to offer.

Regards,

Paul Clarke MRTPI | Chief Planning Officer | Derby City Council, The Council House, Corporation Street, Derby, DE1 2FS | Telephone 01332 641642 | www.derby.gov.uk

Houses in Multiple Occupation Between 2 April and 31 May we are seeking your views on whether we should have more controls over the creation of Houses in Multiple Occupation. Tell us how they affect you and whether more controls are necessary by emailing developmentcontrol@derby.gov.uk using 'HMO consultation' in the subject line, or for more information visit our web page https://letstalk.derby.gov.uk/hmo-proposed-article-4-direction

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From: Steeple Renewables Project <SteepleRenewables@planninginspectorate.gov.uk>
Sent: Tuesday, April 23, 2024 6:25 PM
To: Paul Clarke [redacted]@derby.gov.uk>; Development Control <developmentcontrol@derby.gov.uk>; Steeple Renewables Project <SteepleRenewables@planninginspectorate.gov.uk>
Subject: EN010163 – Steeple Renewables Project – EIA Scoping Notification and Consultation

FAO: Chief Planning Officer Paul Clark

Dear Mr Clark,
Please see attached correspondence on the proposed Steeple Renewable Energy.
Please note the deadline for consultation responses is 21 May 2024 which is statutory requirement that cannot be extended.
Kind regards

Lucy Hicks
EIA & Land Rights Advisor
Environmental Services Team
Major Casework Directorate
The Planning Inspectorate, 3M Kite, Temple Quay, Bristol, BS1 6PN

Helpline: 0303 44 5000
Email: lucy.hicks@planninginspectorate.gov.uk
Web: https://infrastructure.planninginspectorate.gov.uk/ (National Infrastructure Planning)
Web: www.gov.uk/government/organisations/planning-inspectorate (The Planning Inspectorate)

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From: [redacted]
To: Steeple Renewables Project
Subject: EN010163 - Steeples Renewable Project - EIA Scoping
Date: 20 May 2024 14:56:11
Attachments: image001.jpg

You don't often get email from [redacted]@forestrycommission.gov.uk. Learn why this is important

Thank you for consulting the Forestry Commission on this proposal.

As the Governments Forestry Experts, we endeavour to provide relevant information to enable the project to reduce any impact on irreplaceable habitat such as ancient semi natural woodland as well as other woodland.

We can confirm there are no Ancient Semi Natural Woodlands within the site area.

However there is one 1.14ha area of traditional orchard and two areas of lowland mixed deciduous woodland (0.85ha & 2.38ha) within the site that are all on the Priority Habitat Inventory.

This recognises that under the UK Biodiversity Action Plan they were recognised as being the most threatened and requiring conservation action. The UK Biodiversity Action Plan has now been superseded by the UK Post-2010 Biodiversity Framework but this priority status remains under the Natural Environment & Rural Communities Act 2006. (NERC) Sect 40 "Duty to conserve and enhance biodiversity" and Sect 41 – "List of habitats and species of principle importance in England".

The 0.85ha area of woodland is within the area designated as a biodiversity area, however both the traditional orchard and the 2.38ha woodland are within the area designated for panels. While the scoping report states that mature and veteran trees will be a priority for retention, the orchard and woodlands are not specified except to mention improved woodland management.

Fragmentation is one of the greatest threats to lowland mixed deciduous woodland. Woodlands can suffer loss or deterioration from nearby development through damage to soils, roots and vegetation and changes to drainage and air pollution from an increase in traffic, particularly during the construction phase of a development.

For any woodland within the development boundary, land required for temporary use or land where rights are required for the diversion of utilities you must take into consideration the Root Protection Zone. The Root Protection Zone (as specified in British Standard 5837) is there to protect the roots of trees, which often spread out further than the tree canopy. Protection measures include taking care not to cut tree roots (e.g., by trenching) or causing soil compaction around trees (e.g., through vehicle movements or stacking heavy equipment) or contamination from poisons (e.g., site stored fuel or chemicals).

The UK Forestry Standard (UKFS) sets out the UK government's approach to sustainable forestry and woodland management, including standards and requirements as a basis for regulation, monitoring and reporting requirements. The UKFS has a general presumption against deforestation. Page 23 of the Standard states that: "Areas of woodland are material considerations in the planning process…."

A scheme that bisects any woodland will not only result in significant loss of woodland cover but will also reduce ecological value and natural heritage impacts due to habitat fragmentation, and have a huge negative impact on the ability of the biodiversity (flora and fauna) to respond to the impacts of climate change.

Woodland also provides habitat for a range of Section 41 Priority Species including all bats.

With the Government aspiration to increase tree and canopy cover to 16.5% of land area in England by 2050. The Forestry Commission is seeking to ensure that tree planting is a consideration in every development not just as compensation for loss. However, there are a number of issues that need to be considered when proposing significant planting schemes:

- Biosecurity of all planting stock needs to be considered.
- Woodlands need to be climate, pest and disease resilient.
- Maximise the ecosystem services benefits of all new woodland wherever possible (flood reduction)
- Planting contributes to a 'resilient treescape' by maximising connectivity across the landscape.
- Plans are in place to ensure long term management and maintenance of woodland.

It is expected that there will be a thorough assessment of any loss of all trees and woodlands within the project boundary and the development of mitigation measures to minimise any risk of net deforestation because of the scheme. Hedgerows, individual trees and woodlands within a development site should also be considered in terms of their overall connectivity between woodlands affected by the development. Perhaps with the creation of some larger woodland blocks and hedgerow/hedgerow trees to ensure maximum gains to increase habitat connectivity and benefit biodiversity across the whole site, not solely in specific areas or as screening.
Plans should also be in place for the long term management and maintenance of any new woodland, with access needing to be considered for future management.
I hope these comments have been useful to you, if you require any further information, please do not hesitate to contact me.

Best wishes

Sandra

Sandra Squire

Local Partnership Advisor
East & East Midlands

[redacted]
[redacted]@forestrycommission.gov.uk

Disclaimer

Health and Safety Executive

CEMHD Policy - Land Use Planning,
NSIP Consultations,
Building 1.2,
Redgrave Court,
Merton Road,
Bootle, Merseyside
L20 7HS.

HSE email: NSIP.applications@hse.gov.uk

Email only - SteepleRenewables@planninginspectorate.gov.uk

Dear Mr Ian Wallis (EIA Advisor – The Planning Inspectorate) Date: 15/05/2024

PROPOSED STEEPLE RENEWABLES PROJECT (the project)
PROPOSAL BY RENEWABLE ENERGY SOLUTIONS (RES) (the applicant)
INFRASTRUCTURE PLANNING (ENVIROMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (as amended) REGULATIONS 10 and 11

Thank you for your letter of 23 April 2024 regarding the information to be provided in an environmental statement relating to the above project. HSE does not comment on EIA Scoping Reports but the following information is likely to be useful to the applicant.

HSE's land use planning advice

Will the proposed development fall within any of HSE's consultation distances?

According to HSE's records, the proposed DCO application boundary for this Nationally Significant Infrastructure Project falls into the consultation zones of a Major Accident Hazard Site ['MAHS']. This is based on the proposed site boundary as shown in "Steeple Renewables Project", Figure 1.1, 04954-RES-LAY-DR-LE-015, 16/04/24 from Environmental Impact Assessment Scoping Report, April 2024 I DT I P22-1144 (Sheet 8 (planninginspectorate.gov.uk)).

The MAHS is HSE reference H4156, EDF Energy (Thermal Generation), West Burton A Power Station, Retford, Nottinghamshire, DN22 9BL. Whilst HSE believe this power station ceased operation in March 2023, HSE have not received any notification from the Hazardous Substances Authority that the consent has been revoked; in general, a consent remains indefinitely with the land until revocation or part of the land is sold.

The Applicant should make contact with the above operator, to inform an assessment of whether or not the proposed development is vulnerable to a possible major accident. Additionally, the Applicant should make contact with Bassetlaw District Council to establish the status of the hazardous substance consent for the site.

HSE's Land Use Planning advice is dependent on the location of areas where people may be present. Based on the information in the April 2024 Environmental Impact Assessment Scoping Report it is unlikely that HSE would advise against the development. Please note that the advice is based on HSE's existing policy for providing land-use planning advice and the information which has been provided. HSE's advice in response to a subsequent planning application may differ should HSE's policy or the scope of the development change by the time the Development Consent Order application is submitted.

Hazardous Substance Consent

There is no indication within the Environmental Impact Assessment Scoping Report main text [EN010163-000015-Steeple Renewables Project - EIA Scoping Report- Main Text.pdf (planninginspectorate.gov.uk)] that there are hazardous materials which are likely to require Hazardous Substance Consent will be required.

Hazardous substances planning consent is required to store or use any of the Categories of Substances or Named Hazardous Substances set out in Schedule 1 of The Planning (Hazardous Substances) Regulations 2015 as amended, if those hazardous substances will be present on, over or under the land at or above the controlled quantities. There is an 'addition rule' in Schedule 1 to be applied to those substances below-threshold quantities. Further information on HSC should be sought from the relevant Hazardous Substances Authority, if required or if changes to the scheme are made.

Consideration of risk assessments

Regulation 5(4) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 requires the assessment of significant effects to include, where relevant, the expected significant effects arising from the proposed development's vulnerability to major accidents. HSE's role on NSIPs is summarised in the Planning Inspectorate's Advice Note 11 Annex G - Nationally Significant Infrastructure Projects - Advice Note Eleven, Annex G: The Health and Safety Executive - GOV.UK (www.gov.uk). This document includes a section "Risk Assessments" describing the applicable legislation containing the requirement for risk assessment and the role of the HSE.

There is no indication within the Environmental Impact Assessment Scoping Report that an assessment of significant effects arising from this proposal's vulnerability to major accidents. It may be beneficial for applicants to undertake a risk assessment as early as possible to satisfy themselves that their design and operation will meet the requirements of relevant health and safety legislation as design of the Proposed Development progresses

Explosives sites

HSE has no comment to make as there are no licensed explosives sites in the vicinity.

Electrical Safety

No comment from a planning perspective.

At this time, please send any further communication on this project directly to the HSE's designated e-mail account for NSIP applications at nsip.applications@hse.gov.uk . We are currently unable to accept hard copies, as our offices have limited access.

Yours sincerely

[redacted]

Cathy Williams
CEMHD4 NSIP Consultation Team

From: [redacted] Steeple Renewables Project
Subject: EN010163 – Steeple Renewables Project – EIA Scoping Notification and Consultation
Date: 21 May 2024 17:00:29
Attachments: image503506.jpg

Dear Sir/Madam,

Your Ref: EN010163
Our Ref: PL00794384

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11 Application by Renewable Energy Solutions (RES) (the Applicant) for an Order granting Development Consent for the Steeple Renewables Project (the Proposed Development) Scoping consultation and notification

Historic England Advice

Thank you for consulting Historic England on the above referenced EIA scoping report and associated appendices.

Upon reviewing the assessment methodology that has been applied to the scoping report, our observations are as follows.

The study radius for designated assets seems reasonable, however, professional judgment should still be applied to include particularly sensitive/important assets beyond the fixed radius. The search radius for the non-designated assets is best commented upon by the local planning authority's archaeological advisors in this instance.

We would take the opportunity to highlight the need for an approach to setting impact to take in the kinetic views, rather than fixed viewpoints. For a robust approach to settings impact assessment, we refer you to our published guidance at https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/heag180-gpa3-setting-heritage-assets/. Photomontages or visualisations would be helpful to aid the understanding of the impact to the setting of the designated and non-designated heritage assets.
In section 10.3.3 of the scoping report it states 'once the SZTV was applied this reduced the numbers of designated assets', the above-mentioned photomontages or visualisations, plus further clarifications on what assets have been scoped out with this approach, would be beneficial in appraising this EIA scoping report.

Without prejudice to any other assets which may be highlighted through the EIA process, we would also draw attention to the Norman Grade I listed church of St Nicholas, which is located adjacent to the scheduled Roman town and has Roman fabric incorporated into the structure and the Grade II* listed Burton Chateau which sits atop a hill with wide views over the river to its west and North Leverton Windmill.

The illustrative application area is also within the setting of scheduled monument 'Medieval settlement and open field system immediately south east of Low Farm' (NHLE 1017741), where it connects with the power station at West Burton.

The illustrative application area includes part of scheduled monument 'Segulocum Roman town' (NHLE 1003669). The town was located on the west bank of the River Trent at the ford of a Roman road linking Doncaster and Lincoln. It sits within a wider, broadly contemporary archaeological landscape of settlement and activity along the Roman transport network of river and road, noting, for example, the scheduled Roman fort south of Littleborough Lane to the east of the river (NHLE 1004935).

We would also highlight that the scheduled monument Segelocum Roman Town, due to the nature of the archaeological remains, is known to extend well beyond the limits of the scheduling, and likely to contain remains of equivalent importance and contribute to the archaeological significance of the scheduled monument. We would highlight the need for suitable assessment and characterisation of any peripheral archaeological remains to the scheduled monument itself. Further geophysical survey can be found from the County Historic Environment Team and the district Council's Historic Environment advisor in addition to making a detailed Historic Environment Record consultation.
It is pertinent to note the importance of the River Trent in relation to the significance to Segelocum Roman Town, and this should be assessed in reference to the impact to the setting of the monument and the legibility of the monument within the historic landscape.
Furthermore, we would also take the opportunity to highlight the relevance of our guidance on deposit modelling, which can be found at Deposit Modelling and Archaeology | Historic England, which should be applied alongside our guidance on Planning and Archaeology, which can be found at HEAN 17 Planning and Archaeology, (historicengland.org.uk).

In order to effectively reduce risk to archaeological remains through design and mitigation, an iterative approach to field evaluation should be applied, including but not restricted to Trial trench evaluation, a strategy for which should be developed in consultation with the Local Planning Authority.
Certain classes of asset such as flint scatters and military remains will require bespoke approach.
Additionally, any work within the scheduled area will require consultation with Historic England and the granting of consent.

Kind regards,

Hayley James
Inspector of Ancient Monuments
Development Advice | Midlands Region
Historic England | The Foundry | 82 Granville Street | Birmingham | B1 2LH
Telephone: 0121 625 6896

The Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

Amy Charlesworth
Infrastructure Officer
Planning Services
Lincolnshire County Council
County Offices
Newland
Lincoln, LN1 1YL
Tel: 07586481880

Email: NSIPS@lincolnshire.gov.uk

Sent by E-Mail to:
SteepleRenewables@planninginspectorate.gov.uk

Your Ref: EN010163
Date: 21 May 2024

Dear Sir/Madam,

Proposal: Scoping Consultation under The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by Renewable Energy Solutions (RES) (the Applicant) for an Order granting Development Consent for the Steeple Renewables Project (the Proposed Development)

Location: Land at Sturton le Steeple, Nottinghamshire.

Thank you for your letter dated 23 April 2024 consulting Lincolnshire County Council, as a neighbouring authority, on the Environmental Impact Assessment Scoping Report prepared by Pegasus Group on behalf of Renewable Energy Solutions (RES) dated April 2024.

The Council have reviewed the information and have the following comments to make.

Cumulative Impacts
The Council is pleased to see the interrelationship between environmental factors within the ES is proposed to be scoped in, this is welcomed.

An assessment of inter project effects should also be considered. The proposed study area should be sufficient in extent to capture relevant projects within the Lincolnshire geographical boundary. This assessment should include a review of planning applications and the development plan in Lincolnshire and also include other projects that are currently proposed through the Development Consent Order (DCO) process.

Consideration should be given to the cumulative impacts associated with the development and other NSIP schemes within the locality, in particular Gate Burton Energy Park, West Burton Solar Project, Cottam Solar Project, Tillbridge Solar Project and North Humber to High Marnham, which are currently at pre-application, pre-examination, recommendation and decision stage.

The Council would expect the ES to contain a separate chapter on the assessment of cumulative effects covering both intra project and inter projects effects. Which, in addition to setting out the approach and methodology, clearly identifies other relevant projects and the potential for cumulative effects, any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources. It should also provide an assessment of the significance of the potential cumulative impacts identified, likely duration of the impacts (including phasing details) and mitigation measures.

Landscape and Visual Impact

It is noted that the landscape and visual study area extends into areas within Lincolnshire County Councils administrative boundary. Considering the proximity of this boundary to the project scope there is potential for the development to indirectly impact on the wider landscape character and/or setting in Lincolnshire. Particularly in respect of cumulative landscape impacts and impacts on visual amenity. The applicant is advised to consult with the County Council and West Lindsey District Council to ascertain whether there are any landscape areas, sensitivity receptors or viewpoints from within the Lincolnshire boundary that should be considered in the landscape and visual assessments.

Paragraph 7.4.5 of the Scoping Report sets out the planning policy context. Lincolnshire County Council should also be considered as its administrative boundary is within close proximity of the proposals. This includes the policies contained within the Lincolnshire Mineral and Waste Local Plan (2016) and the Central Lincolnshire Local Plan (2023). Please note the Lincolnshire Minerals and Waste Local Plan is currently under review.

Built Heritage

As above, the study area identified for cultural heritage (3km from the site boundary) also extends into Lincolnshire County Councils administrative boundary. Consideration should be given to any impacts upon heritage assets including built heritage and historic landscapes located within Lincolnshire. The applicant is advised to view 'The Historic Landscape Characterisation Project for Lincolnshire' which should be included as a data source and can be found on the Council's website here:
www.lincolnshire.gov.uk/historic-environment/historic-landscape-characterisation

The applicant is also advised to review the Historic Environment Record (HER) held by Lincolnshire County Council. Further information on the HER can be found on the council's website here:
www.lincolnshire.gov.uk/historic-environment/historic-environment-record

Traffic and Transport

The Scoping Report Section 14, in particular Table 14.1 identifies key highway links. Some of which route through Lincolnshire on predominantly single carriageway A-Roads.

Consideration should therefore be given to traffic routing for construction traffic and how this is likely to impact the Lincolnshire road network, amenity and combined effect of construction traffic with other development in the locality, including the other NSIP schemes referred to above. The engagement with local authorities in respect of traffic and transport at paragraphs 14.3.2 to 14.3.3 of the Scoping Report is noted. The Council would expect the Lincolnshire Highway Authority to be included in this consultation.

Waste
Further consideration should be given to the impact of waste generated from the decommissioning phase and/or end of life solar arrays requiring replacement, in terms of how and where it is disposed of and its transportation from the site. Given the number of other solar schemes in the locality that would be operating on similar timescales there is potential for significant amounts of waste to be generated at this stage. The impact from replacement and/or decommissioning should also be considered cumulatively with these other developments.

To date the applicant has had very little discussion with the County Council and it is expected that more dialogue will take place with the neighbouring authorities as the project proceeds through the pre-application stage.

Should you have any queries please do not hesitate to contact me.

Yours faithfully,
Amy Charlesworth

For Neil McBride
Head of Planning

Mansfield District Council

Mansfield District Council

Our Ref: Sturton/NSIP

Your Ref: EN010163

Please Ask For: Clare Cook

Contact: [redacted]

Email[redacted]@Mansfield.gov.uk

Date: 20th May 2024

Dear Sir,

Re: Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by Renewable Energy Solutions (RES) (the Applicant) for an Order granting Development Consent for the Steeple Renewables Project (the Proposed Development)

Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested

I refer to your letter dated 23rd April in respect of the above and I provide the response from Mansfield District Council below. Please note that this response has not been reported to Members is a technical response from Officers.

The site of the proposed solar PV generating station is located across an area of approximately 943 hectares that is mainly agricultural land near the settlement of Sturton-le-Steeple in North Nottinghamshire. This is approximately 26 miles from the centre of the district of Mansfield. On this basis, it is not considered that the proposal would generate any detrimental physical or environmental impacts on the district.

However, the EIA Scoping Report also refers to socio-economics, that will also be assessed. As part of the construction and decommissioning of the proposal, there may be positive benefits for the district in terms of employment opportunities for residents and economic opportunities in terms of accommodation for construction workers.

In terms of how the proposal may impact on the delivery of strategies and plans of the district council and its partners, there are number of documents that contain policies and / or objectives that seek to mitigate the impact of climate change and contribute towards Net Zero. These include the district councils corporate plan 'Towards 2030 – A Strategy for Mansfield, Refresh 2024' (https://mansfield.moderngov.co.uk/documents/s2224/Towards%2020230%20A%20

Strategy%20for%20Mansfield.pdf), adopted Mansfield District Local Plan (https://www.mansfield.gov.uk/local-plan/adopted-local-plan-2013-2033), and Climate Change Strategy (https://www.mansfield.gov.uk/downloads/download/452/climate-change). Whilst the proposal would not have a direct impact on the implementation of these documents, the delivery of appropriate, environmentally friendly, and sustainable projects and infrastructure that would help contribute toward local and national targets in terms of achieving Net Zero is welcomed and supported in principle (subject to comments from other consultees).

In addition to the comments relating to the Mansfield District, the council have the following comments about EIA Scoping Report that has been submitted by the applicant:

- Section 8 – This considers Ecology and Biodiversity issues. As part of this, a range of designated sites have been identified as part of the baseline position. This includes the Birklands and Bilhaugh SAC at paragraph 8.2.7, Table 8.A.1 of Appendix 8A and Figure 8.A.1 of Appendix 8A. Whilst this is located within the adjoining district of Newark and Sherwood it is also in relatively close proximity to Mansfield. Therefore, the identification of this site is welcomed and supported. It is noted that table 8.A.1 states that the Birklands and Bilhaugh SAC is 19.5km north of the NSIP site. The SAC is in fact located to the south-west of the site. It is felt that this error should be corrected in future documents where reference to the SAC is made.
- Section 8 – In terms of data sources, it is recommended that information be sought from the relevant Wildlife Trusts and Nottinghamshire Biological Records data (https://nottsbag.org.uk/recording/biological-recording-in-nottinghamshire/.
- Section 11 – Socio-economic impacts – Table 11.1 within paragraph 11.2.1 highlights that Bassetlaw and Nottinghamshire would be within the 'secondary impact zone' that has been identified. This is followed up by paragraph 11.2.2 that sets out the sources of data that will be used to obtain baseline information. It is considered that information should be sought from relevant district and county councils who hold such information. This includes the recently launched Notts data and local insight website that can be viewed at https://observatory.nottinghamshire.gov.uk/
- Section 13 – This addresses issues around climate change. At paragraph 13.4.1, reference is made to the various legislation, policy and guidance that will be used when undertaking the assessment of this element. In addition to those listed, it is recommended that consideration be given to Nottinghamshire County Councils emerging Net Zero Framework document that can be viewed at https://observatory.nottinghamshire.gov.uk/ https://www.nottinghamshire.gov.uk/DMS/Document.ashx?czJKcaeAi5tUFL1DTL2UE4zNRBcoShgo=ncmFhRW3Ytk7iblMmEzIwubm9X6XGp9%2bmEltgpM7gnQ6S%2fKNdxA0%2bA%3d%3d&rUzwRPf%2bZ3zd4E7Ikn8Lyw%3d%3

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- Section 14 – This addresses transport and access. At paragraph 14.13 reference is made to the documents that will be used to assess transport impacts. In addition to those listed, it is recommended that reference be made to Nottinghamshire County Councils' Highway Design Guide that can be viewed at: https://www.nottinghamshire.gov.uk/transport/roads/highway-design-guide.'

Comments are also provided in respect of conservation as follows:

The issues that would be considered with regards to an Environmental Impact Assessment Scoping Report would be, are there any Heritages Assets (HA) situated within the site boundary. Taking into consideration the site location, HA's associated with Mansfield District would not be a consideration.

Following this would be, are there any HA's within the setting and whether these would be affected. Those HA's within the Mansfield District, within close proximity to the application site, are situated considerable distances away and between which are large swathes of landscaping, including landscaped grounds associated with Clumber Park, but also decent sized settlements as seen at Retford, it is therefore considered that the proposal would not impact of the settings of those HA's situated within closest proximity to the application site.

Archaeology would be another consideration, but it is assumed a consultation request would be forwarded to the relevant body with request for a report to be submitted.

If the proposal was accepted in principle, then landscaping would be an issue, as the introduction of a solar panel farm does alter the open landscaping setting, it is very important that landscape and the character of the area is scoped in to any environmental statement.

Many sections of the scoping report will rely on observations from statutory bodies and the host Authority and on this basis Mansfield District Council would expect that their comments are taken into account.

I trust that these comments are of use.

Yours sincerely

Martyn Saxton
Head of Planning and Regeneration

From: [redacted]
To: Steeple Renewables Project
Subject: FW: [EXTERNAL] FW: EN010163 – Steeple Renewables Project – EIA Scoping Notification and Consultation
Date: 24 April 2024 10:36:11
Attachments: image001.png
Steeple - Letter to stat cons_Scoping & Reg 11 Notification.pdf

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Good Morning Lucy,

Thank you for your email.

Regarding EN010163 for Steeple Renewables Project there are no National Gas assets affected in this area.

If you would like to view if there are any other affected assets in this area, please raise an enquiry with www.lsbud.co.uk. Additionally, if the location or works type changes, please raise an enquiry.

Kind regards

Hayley White
Asset Protection Assistant

[redacted]@nationalgas.com

National Gas Transmission, Warwick Technology Park, Gallows Hill, Warwick, CV34 6DA
nationalgas.com I **Twitter** I **LinkedIn**

From: Steeple Renewables Project <SteepleRenewables@planninginspectorate.gov.uk>
Sent: 23 April 2024 19:48
To: box.assetprotection@nationalgas.com
Subject: [EXTERNAL] FW: EN010163 – Steeple Renewables Project – EIA Scoping Notification and Consultation

FAO: National Gas

Please see attached correspondence on the proposed Steeple Renewable Energy.
Please note the deadline for consultation responses is **21 May 2024** which is statutory requirement that cannot be extended.
Kind regards

Lucy Hicks
EIA & Land Rights Advisor
Environmental Services Team
Major Casework Directorate
The Planning Inspectorate, 3M Kite, Temple Quay, Bristol, BS1 6PN

Helpline: 0303 44 5000
Email: lucy.hicks@planninginspectorate.gov.uk
Web: https://infrastructure.planninginspectorate.gov.uk/ (National Infrastructure Planning)
Web: www.gov.uk/government/organisations/planning-inspectorate (The Planning Inspectorate)
Twitter: @PINSgov
This communication does not constitute legal advice.
Please view our Privacy Notice before sending information to the Planning Inspectorate.

DPC:76616c646f72

monitoring for operational reasons or lawful business practices.

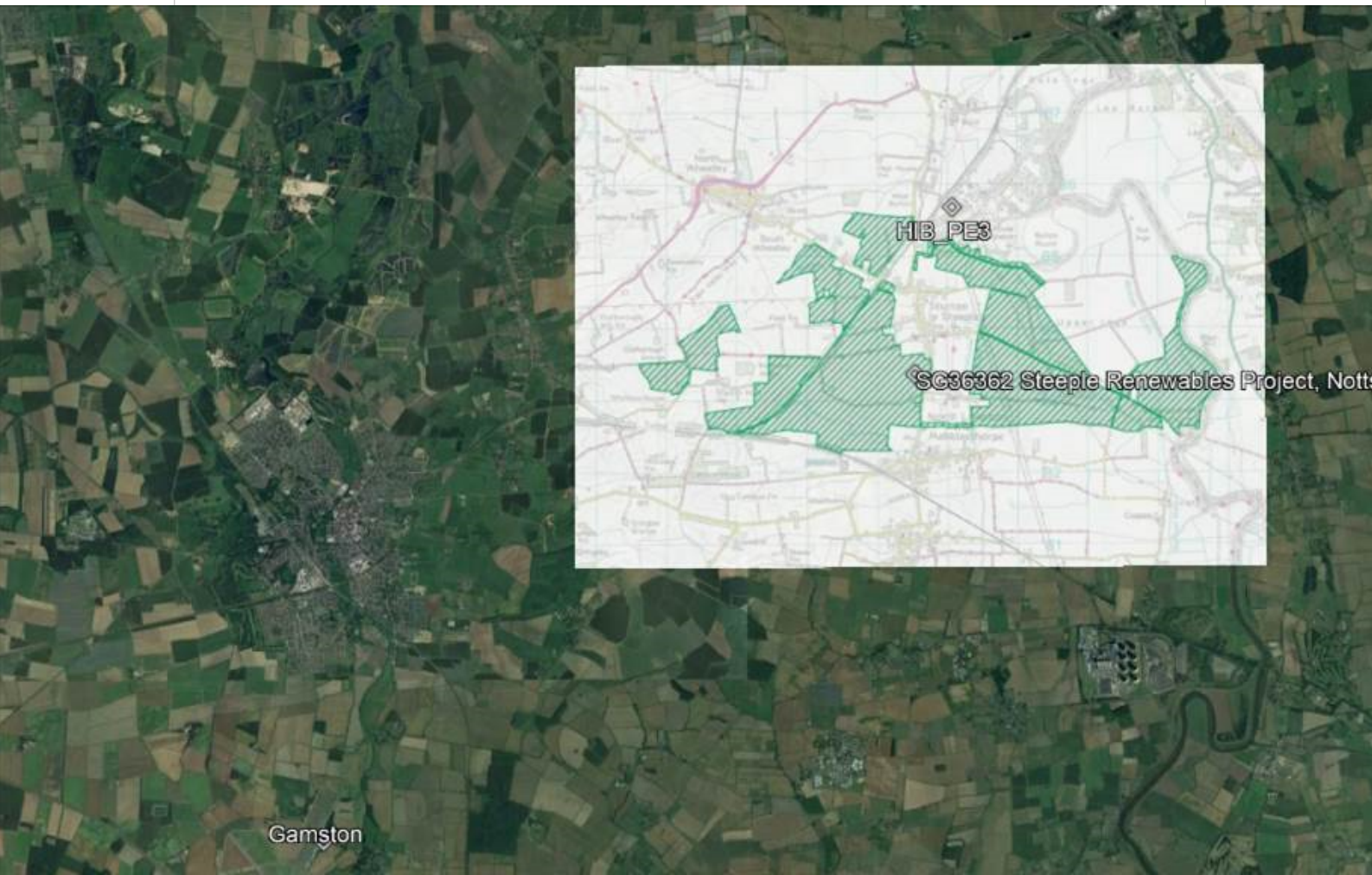
For the registered information on National Gas Transmission please use the attached link: https://nationalgas.com/about-us/corporate-registrations.

From: [redacted]
To: Steeple Renewables Project
Cc: [redacted]
Subject: RE: EN010163 – Steeple Renewables Project – EIA Scoping Notification and Consultation [SG36362]
Date: 01 May 2024 17:12:48
Attachments: image003.png
image004.png
image005.png
image006.png
image007.png
image009.png
image002.jpg
image001.png

Dear Sirs,

We refer to the Scoping consultation dated 23 April 2024. NATS operates no infrastructure within 10km of the site in question. Accordingly it anticipates no impact from the application and has no comments to make on the Scoping Opinion.

Regards
S. Rossi
NATS Safeguarding Office



Date: 17 May 2024
Our ref: 474066
Your ref: EN010163

The Planning Inspectorate

BY EMAIL ONLY

Consultations
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 900

Dear Ian Wallis

Environmental Impact Assessment Scoping Consultation under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulation 11

Proposal: Steeple Renewables Project
Location: Land at Sturton le Steeple, Nottinghamshire

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 23 April 2024, received on 23 April 2024.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

A robust assessment of environmental impacts and opportunities, based on relevant and up to date environmental information, should be undertaken prior to an application for a Development Consent Order (DCO). Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development.

To date, Natural England have not been engaged with the project during the pre-application stages; as such, our advice at this stage is limited, and based upon the information set out within the EIA Scoping Report.

Should the Applicant wish to consult with Natural England further during the Pre-Application period, we would be happy to engage via our Discretionary Advice Service.

For any further advice on this consultation please contact the case officer Robbie Clarey and copy to consultations@naturalengland.org.uk.

Yours sincerely

Robbie Clarey
Planning & Environment Senior Adviser

Annex A – Natural England's Advice on EIA Scoping

1- General principles

Regulation 11 of the Infrastructure Planning Regulations 2017 - (The EIA Regulations) sets out the information that should be included in an ES to assess impacts on the natural environment. This includes:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases
- Appropriately scaled and referenced plans which clearly show the information and features associated with the development
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen
- A description of the aspects and matters requested to be scoped out of further assessment with adequate justification provided[1].
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc.) resulting from the operation of the proposed development
- A description of the aspects of the environment likely to be significantly affected by the development including biodiversity (for example fauna and flora), land, including land take, soil, water, air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), cultural heritage and landscape and the interrelationship between the above factors
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium, and long term, permanent and temporary, positive, and negative effects. Effects should relate to the existence of the development, the use of natural resources (in particular land, soil, water and biodiversity) and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment
- An outline of the structure of the proposed ES

Natural England have not been engaged with the project up until this point, however, based on the EIA Scoping Report provided, it appears that these principles are likely to be met.

2- Cumulative and in-combination effects

The ES should fully consider the implications of the whole development proposal. This should include an assessment of all supporting infrastructure.

An impact assessment should identify, describe, and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment (subject to available information):

a. existing completed projects;
b. approved but uncompleted projects;
c. ongoing activities;

[1] National Infrastructure Planning Advice Note Seven, Environmental Impact Assessment, Process, Preliminary Environmental Information and Environmental Statements (see Insert 2 – information to be provided with a scoping request)

d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

Plans or projects that Natural England are aware of that might need to be considered in the ES	
Project /Plan	Status
Springwell Solar Farm	Plans and projects which are reasonably foreseeable
North Humber to High Marnham Electricity Transmission	Plans and projects which are reasonably foreseeable
Cottam Solar	Plans or projects for which an application has been made and which are under consideration by the consenting authorities
West Burton	Plans or projects for which an application has been made and which are under consideration by the consenting authorities
Great North Road Solar Project	Plans and projects which are reasonably foreseeable
Gate Burton	Plans or projects for which an application has been made and which are under consideration by the consenting authorities
Tillbridge Solar Farm	Plans or projects for which an application has been made and which are under consideration by the consenting authorities

3- Environmental data

Natural England is required to make available information it holds where requested to do so. National datasets held by Natural England are available at http://www.naturalengland.org.uk/publications/data/default.aspx.

Detailed information on the natural environment is available at www.magic.gov.uk. This includes Marine Conservation Zone GIS shapefiles.

Natural England's SSSI Impact Risk Zones are a GIS dataset which can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the Natural England Open Data Geoportal.

Natural England does not hold local information on local sites, local landscape character, priority habitats and species or protected species. Local environmental data should be

obtained from the appropriate local bodies. This may include the local environmental records centre, the local wildlife trust, local geo-conservation group or other recording society.

4- Designated nature conservation sites

International and European sites

The ES should thoroughly assess the potential for the proposal to affect internationally designated sites of nature conservation importance / European sites. This includes Special Protection Areas (SPA), Special Areas of Conservation (SAC), listed Ramsar sites, candidate SAC and proposed SPA.

Article 6 (3) of the Habitats Directive requires an appropriate assessment where a plan or project is likely to have a significant effect upon a European Site, either individually or in combination with other plans or projects.

Section 8.3.9 of the EIA Scoping Report notes that internationally designated sites will be scoped in, which is welcomed. Appendix 8a also notes that Natural England's Impact Risk Zones have been used to inform the desk study; Natural England consider the search radius and methodology suitable.

The following European/internationally designated nature conservation site(s) are located within 30km of the proposed development site, as identified within Appendix 8a.

<u>The Humber Estuary SPA, Ramsar, and SAC.</u>

The Humber Estuary sites are located approx. 26.5km North of the development site. Section 8.2.9 of the EIA Scoping report only makes reference to the Humber Estuary Ramsar. Consideration must also be given to the SPA and SAC designation within the ES.

Impacts to the passage and wintering birds associated within the SPA and Ramsar Designations are most relevant, largely due to the mobile & migratory nature of the notified species. Impacts to species associated with these sites must be considered within the ES, including via loss or disturbance to Functionally Linked Land. Natural England welcome the consideration of wintering birds, as noted in EIA Scoping Report section 8.2.29, as well as discussion at section 8.3.6, which notes no significant activity from SPA/Ramsar birds has been recorded at the site in the survey effort reviewed to date (October-December 2023). It is also noted that this will be considered in full within the Report to inform the HRA, which is welcomed.

Natural England advise that where this initial year's survey indicates very low levels of use by SPA/Ramsar species, this survey effort may be satisfactory for this project, however, where there remains any doubt about the use of the site by these species, further survey is likely to be required over a 2nd winter. Natural England have produced standing advice for bird survey guidance for the Humber Estuary and Lower Derwent Valley Functionally Linked Land, see **annex C** attached. The most recent list of component species should be considered in assessment of impacts to the Humber Estuary SPA, see **annex B** attached.

Despite the physical separation of the development site to the SAC, consideration should be given within the Report to Inform the HRA to rule out any impacts to the features of the SAC too.

<u>Thorne & Hatfield Moors SPA, Thorne Moor SAC, and Hatfield Moor SAC</u>

The Thorne & Hatfield Moors designations lie approximately 19.5km North-West of the

development site. The SPA is designated primarily for it's Nightjar interest; whilst the development site is significantly further than the usually considered 2km Impact Risk Zone for this species, Natural England consider the ES should consider any possible impacts, including via loss or disturbance to Functionally Linked Land.

Impacts to the features of the two SAC designations are considered unlikely due to the physical and hydrological separation, however, this should still be assessed and considered within the Report to Inform the HRA.

Birklands and Bilhaugh SAC

Birkland and Bilhaugh SAC lies approx. 17km South-West of the development site and is designated primarily for it's ancient woodland interest. Impact to this site are considered unlikely due to the physical and hydrological separation from the development site.

5- Nationally designated sites

Sites of Special Scientific Interest[2]

The ES should include a full assessment of the direct and indirect effects of the development on the features of special interest within any nearby SSSIs, including setting out why impacts can be screened out within the ES, and identify appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects.

Section 8.3.9 of the EIA Scoping Report notes that Statutorily designated sites will be scoped in, which is welcomed. Appendix 8a also notes that Natural England's Impact Risk Zones have been used to inform the desk study; consider the search radius and methodology suitable.

A number of SSSIs lie within 5km of the proposed development, as set out in Table 8.A.1 of Appendix 8a, including Clarborough Tunnel, Lea Marsh, Ashton's Meadow, Sutton and Lound Gravel Pits, Chesterfield Canal and Treswell Wood.

Clarborough Tunnel SSSI lies adjacent to the development site in the South-West corner; as such may be susceptible to impacts from the proposed development, for example from direct disturbance, dust mobilisation and vehicle emissions during construction. These impacts should be considered in full within the ES. It is noted that air quality impacts during construction have been scoped into the ES; Natural England note that sensitive ecological receptors, including Clarborough tunnel SSSI, should be included in this assessment.

In addition to the above, Natural England note the potential for enhancement of the habitat in proximity to Clarborough Tunnel SSSI and welcome the intention for the closest area of the site to be used for biological mitigation and enhancement.

Section 8.3.8 states that impacts to other SSSIs can be ruled out, due to the distance (minimum 1.6km) from the development site. None of the relevant SSSI Impact Risk Zones[3] are triggered by the development in this location; as such, Natural England consider impacts to other sites unlikely. Nonetheless, rationale should be included within the ES as to why impacts to these sites can be ruled out.

[2] Sites of Special Scientific Interest are protected under the Wildlife and Countryside Act 1981 (as amended). Further information on SSSIs and their special interest features can be found at www.magic.gov .

[3] Natural England's SSSI Impact Risk Zones can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the Natural England Open Data Geoportal.

6- Regionally and Locally Important Sites

The ES should consider any impacts upon local wildlife and geological sites, including local nature reserves. Local Sites are identified by the local wildlife trust, geo-conservation group or other local group and protected under the NPPF (para 180). The ES should set out proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks. Contact the relevant local body for further information.

Natural England welcome the scoping in of Local Nature Conservation Sites within the EIA Scoping Report.

7- Protected species

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law. Records of protected species should be obtained from appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area.

The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants.

Natural England will not make detailed comments on Protected Species elements of this project. Natural England has adopted standing advice for protected species, which includes guidance on survey and mitigation measures. Applicants should check to see if a mitigation licence is required using NE guidance on licencing NE wildlife licences. Natural England are unable to advise upon the need for a licence; this responsibility falls to the developer.

Where licence need is identified, applicants should also make use of Natural England's charged Pre Submission Screening Service, during the pre-application stages, for a review of a draft wildlife licence application. Through this service Natural England will review a full draft licence application to issue a Letter of No Impediment (LONI) which explains that based on the information reviewed to date, that it sees no impediment to a licence being granted in the future should the DCO be issued. This is done to give the Planning Inspectorate confidence to make a recommendation to the relevant Secretary of State in granting a DCO. Advice Note Eleven, Annex C – Natural England and the Planning Inspectorate | National Infrastructure Planning contains details of the LONI process.

8- Priority Habitats and Species

Priority Habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Lists of priority habitats and species can be found here. Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. Sites can be checked against the (draft) national Open Mosaic Habitat (OMH) inventory published by Natural England and freely available to download. Further information is also available here.

An appropriate level habitat survey should be carried out on the site, to identify any important habitats present. In addition, ornithological, botanical, and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present.

The ES should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys)
- Additional surveys carried out as part of this proposal
- The habitats and species present
- The status of these habitats and species (e.g. whether priority species or habitat)
- The direct and indirect effects of the development upon those habitats and species
- Full details of any mitigation or compensation measures
- Opportunities for biodiversity net gain or other environmental enhancement

9- Ancient Woodland, ancient and veteran trees

Ancient woodland is an irreplaceable habitat of great importance for its wildlife, its history, and the contribution it makes to our diverse landscapes. Paragraph 186 of the National Planning Policy Framework (NPPF) sets out the highest level of protection for irreplaceable habitats and development should be refused unless there are wholly exceptional reasons, and a suitable compensation strategy exists. This is reflected in NPS EN-1 paragraphs 5.4.14-15.

A number of Ancient woodland sites have been identified within the search area for the project. The ES should assess the impacts of the proposal on any ancient woodland or ancient and veteran trees, with the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement. Natural England and the Forestry Commission have prepared standing advice on ancient woodland, ancient and veteran trees.

Natural England maintains the Ancient Woodland Inventory which can help identify ancient woodland. The wood pasture and parkland inventory sets out information on wood pasture and parkland. The ancient tree inventory provides information on the location of ancient and veteran trees.

10- Biodiversity Net Gain

The Environment Act 2021 includes NSIPs in the requirement for Biodiversity Net Gain (BNG), with the biodiversity gain objective for NSIPs defined as at least a 10% increase in the pre-development biodiversity value of the on-site habitat. It is the intention that BNG should apply to all terrestrial NSIPs accepted for examination from November 2025.

The EIA Scoping report section 8.3.18 states that measures to enhance the overall biodiversity of the site will be implemented, however, no specific reference is made to the Statutory Biodiversity Metric, nor a target for biodiversity net gain delivery. Natural England advise that the project should include a commitment to at least 10% Biodiversity Net Gain, as is the intention of the Environment Act. Ideally, the opportunity provided by the application should enable delivery of significantly more than this 10%.

Biodiversity Net Gain outcomes can be achieved on-site, off-site or through a combination of

both, however, on-site provision should be considered first. Natural England advise that the Statutory Biodiversity Metric should be used to calculate the biodiversity impact of the development.

In order to maximise nature recovery and target habitat enhancement where it will have the greatest local benefit it is recommended that locally identified opportunities should be acknowledged and incorporated into the design of BNG (both on and off-site). This should include any locally mapped ecological networks and priority habitats identified within and close to the development site. The Nottinghamshire Biodiversity Opportunity Mapping[4] may be a useful resource. Natural England also recommend consultation with the Nottinghamshire Biodiversity Action group, Nottinghamshire Wildlife Trust, and any other local bodies, who may be able to provide invaluable local knowledge to help steer the mitigation and enhancement proposed at the site.

In addition, Local Nature Recovery Strategies (LNRS) are a new mandatory system of spatial strategies for nature established by the Environment Act 2021 which will contribute to the national Nature Recovery Network (NRN). Work is currently underway to develop these strategies, which will identify strategic priorities for nature protection, recovery, and enhancement. Given the size and scale of the project, there are opportunities not only for enhancing biodiversity In the locality, but also to create and enhance ecological connectivity in the area, contributing to the Nature Recovery Network and climate change resilience.

11- **Landscape**

Nationally designated landscapes

The development site is not within, or within proximity to, any nationally designated landscapes.

Landscape and visual impacts

The environmental assessment should refer to the relevant National Character Areas. Character area profiles set out descriptions of each landscape area and statements of environmental opportunity.

Whilst Natural England will not usually make comments on local landscape impacts, the EIA should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies. We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.

A landscape and visual impact assessment should also be carried out for the proposed development and surrounding area. Natural England recommends use of the methodology set out in *Guidelines for Landscape and Visual Impact Assessment 2013 (*(3rd edition) produced by the Landscape Institute and the Institute of Environmental Assessment and Management. For National Parks and National Landscapes, we advise that the assessment also includes effects on the 'special qualities' of the designated landscape, as set out in the statutory management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status.

[4] The Nottinghamshire BOM Project - Background Information Report Feb 2016 FINAL

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. This should include an assessment of the impacts of other proposals currently at scoping stage.

To ensure high quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the proposed development should reflect local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides as well as guidance in the National Design Guide and National Model Design Code. The ES should set out the measures to be taken to ensure the development will deliver high standards of design and green infrastructure. It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit.

The National Infrastructure Commission has also produced Design Principles Design Principles for National Infrastructure - NIC endorsed by Government in the National Infrastructure Strategy.

12- Connecting people with nature

The EIA Scoping Report section 7.2.2 notes that there are a number of Public Right of Way within the development site. The ES should consider potential impacts on access land, common land and public rights of way in line with NPPF paragraph 104 and NPS EN-1 paras 5.11.24 & 5.11.30. It should assess the scope to mitigate for any adverse impacts. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

Measures to help people to better access the countryside for quiet enjoyment and opportunities to connect with nature should be considered. Such measures could include reinstating existing footpaths or the creation of new footpaths, cycleways, and bridleways. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Access to nature within the development site should also be considered, including the role that natural links have in connecting habitats and providing potential pathways for movements of species. Inclusion of interpretation boards and signage may also contribute to an enhanced enjoyment and understanding of the local environment and project. Relevant aspects of local authority green infrastructure strategies should also be incorporated where appropriate.

13- Soils and agricultural land quality

Due to the scale of the project, there is potential for significant impacts to Soils and Best and Most Versatile Agricultural Land.

Soils are a valuable, finite natural resource and should also be considered for the ecosystem services they provide, including for food production, water storage and flood mitigation, as a carbon store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil resources are protected and sustainably managed. Impacts from the development on soils and best and most versatile (BMV) agricultural land should be considered in line paragraphs 5.168, 5.167 and 5.179 of the NPS for National Networks. Further guidance is set out in the Natural England Guide to assessing development proposals on agricultural land.

Section 16.2.4 of the EIA Scoping Report states that an ALC survey will be undertaken across the whole site, although no detail is provided at this stage regarding the methodology for this. Natural England would provide the following advice in relation to the ALC survey and consideration of soils and Best and Most Versatile Land within the ES:

The ALC survey should be undertaken at a detailed level (1 auger per ha) across the entire development site, including any cable routes, mitigation areas etc. The survey data should inform the soil management plan for the site, including suitable soil handling methods and appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space). The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise off-site impacts. Further information is available in the Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites and The British Society of Soil Science Guidance Note Benefitting from Soil Management in Development and Construction, which Natural England consider should be followed.

The ALC survey should also be used to inform the final design of the project and inform micro-siting of infrastructure such as the BESS to avoid BMV land. The ES should then set out details of how any adverse impacts on BMV agricultural land have been minimised through site design/masterplan.

Results of the ALC survey should be presented to indicate the land take (including amount of BMV land) for each element of the proposals, i.e. Solar PV areas, cable routes, Access tracks, BESS/substation infrastructure and mitigation/enhancement areas. This should also include clarity regarding any agricultural land to be permanently lost.

The EIA Scoping report suggests that the lifetime of the development will be 40 years. Natural England note that it is unclear whether the DCO will specify a 40-year time limit. During the life of the proposed development it is likely that there will be a reduction in potential agricultural production over the development area subject to the solar panel arrays and habitat enhancement. If not time limited, the areas subject to a change in land use or land management (i.e. The land under the solar arrays and the land subject to habitat enhancement) have the potential to lead to the permanent reduction in the land's potential agricultural production.

Natural England also consider that commitment should be made through the DCO to reinstate all Best and Most Versatile Land back to it's former ALC grade, following decommissioning.

14- Climate Change

The England Biodiversity Strategy published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development will embed Nature Based Solutions, maintain ecological networks and build resilience to climate change. The ES should also incorporate the policies as set out in NPS EN-1 relating to climate change. The NPPF also requires that the planning system should contribute to the enhancement of the natural environment 'by establishing coherent ecological networks that are more resilient to current and future pressures' (NPPF Para 180), which should be demonstrated through the ES.

Annex B: Humber Estuary Special Protection Area: non-breeding waterbird assemblage (Version 1.2, June 2023)

The Humber Estuary Special Protection Area (SPA) qualifies under article 4.2 of the European Commission Bird Directive (79/409/EEC) in that it supports an internationally important assemblage of waterbirds. Confusion can arise concerning which species to consider when assessing the Humber Estuary SPA non-breeding, waterbird assemblage feature.

Natural England recommends focusing on what are referred to as the 'main component species' of the assemblage. Main component species are defined as:

a) All species listed individually under the assemblage feature on the SPA citation (i.e the species that qualified in 2007 when the site was designated).
b) Species which might not be listed on the SPA citation but occur at site levels of more than 1% of the national population according to the most recent Humber Estuary Wetland Bird Survey (WeBS) 5-year average count (currently 2017/18 - 2021/22).
c) Species where more than 2000 individuals are present according to the most recent Humber Estuary WeBS count.

The assemblage qualification is therefore subject to change as species' populations change. It should be noted that species listed on the citation under the assemblage features, whose populations have fallen to less than 1% of the national population, retain their status as a main component species and should be considered when assessing the impacts of a project or plan on the Humber Estuary SPA.

Natural England advises that the main component species of the Humber Estuary SPA non-breeding waterbird assemblage include (June 2023):

a) Species listed individually under the assemblage feature on the SPA citation:

- Avocet, *Recurvirostra avosetta* (non-breeding)
- Bar-tailed godwit*, Limosa lapponica* (non-breeding)
- Bittern, *Botaurus stellaris* (non-breeding)
- **Black-tailed godwit*, Limosa limosa islandica* (non-breeding)[1]**
- **Brent goose, *Branta bernicla* (non-breeding)[1]**
- **Curlew, *N. arquata* (non-breeding)[1]**
- **Dunlin, *Calidris alpina alpina* (non-breeding)[1]**
- **Golden plover, *Pluvialis apricaria* (non-breeding)[1]**
- Goldeneye, *Bucephala clangula* (non-breeding)
- Greenshank, *T. nebularia* (non-breeding)
- Grey plover, *P. squatarola* (non-breeding)
- Knot, *Calidris canutus* (non-breeding)
- **Lapwing, *Vanellus vanellus* (non-breeding)[1]**
- **Mallard, *Anas platyrhynchos* (non-breeding[1]**
- Oystercatcher, *Haematopus ostralegus* (non-breeding)
- Pochard, *Aythya farina* (non-breeding)
- **Redshank, *Tringa totanus* (non-breeding[1]**
- Ringed plover, *Charadrius hiaticula* (non-breeding)
- **Ruff, *Philomachus pugnax* (non-breeding)[1]**
- Sanderling, *Calidris alba* (non-breeding)

[1] Species known to use off-site supporting habitat / functionally linked land (FLL) in the non-breeding season

- Scaup, *Aythya marila* (non-breeding)
- **Shelduck, *Tadorna tadorna* (non-breeding) [1]**
- **Teal, *Anas crecca* (non-breeding)[1]**
- Turnstone, *Arenaria interpres* (non-breeding)
- **Whimbrel, *Numenius phaeopus* (non-breeding)[1]**
- **Wigeon, *Anas Penelope* (non-breeding)[1]**

And

b) Species which are not listed on the SPA citation but occur at site levels of more than 1% of the national population according to the most recent Humber Estuary Wetland Bird Survey (WeBS) 5-year average count:

- Green sandpiper, *Tringa ochropus* (non-breeding)
- **Greylag goose, *Anser anser* (non-breeding)[1]**
- **Little egret, *Egretta garzetta* (non-breeding)[1]**
- **Pink-footed goose, *Anser brachyrhynchus* (non-breeding)[1]**
- Shoveler, *Anas clypeata* (non-breeding)
- **Crane, *Grus grus* (non-breeding)[1]**

As stated above, the assemblage qualification is subject to change as species' populations change; therefore, the appropriate WeBS data should be considered in any assessment and the above list should be used as a guide only.

Please note, the advice set out above should be considered when assessing potential impacts on the waterbird assemblage feature. You will also need to consider potential impacts on species which are not considered to be non-breeding waterbirds but are listed on the citation qualifying under article 4.1 and 4.2 of the Directive. These include:

- **Hen harrier, *Circus cyaneus* (non-breeding)[1]**
- **Marsh Harrier, *Circus aeruginosus* (breeding)[1]**
- Little tern, *Sterna albifrons* (breeding)
- Avocet*, Recurvirostra avosetta* (breeding)
- Bittern, *Botaurus stellaris* (breeding)

The species marked **[1] in bold text** are known to use off-site supporting habitat / functionally linked land (FLL) (e.g. arable farmland, grassland/pasture, and/or non-estuarine waterbodies) in the non-breeding season and may therefore be the most relevant for assessing potential impacts of a proposed plan/project on birds using FLL associated with the Humber Estuary SPA. However, please note that this list should be used as a guide only; usage may depend on factors such as the habitats available on the site and distance to the Humber Estuary etc. Therefore, assessments of potential impacts on birds using functionally linked land should consider all relevant species and clear justification should be provided if any species are excluded from the assessment.

[1] Species known to use off-site supporting habitat / functionally linked land (FLL) in the non-breeding season

Annex C: Passage and wintering bird surveys for functionally linked land associated with the Humber Estuary and/or Lower Derwent Valley designated sites (Version 1.1, December 2021)

Background

The below guidance is intended to inform assessments of proposed development sites in proximity to the Humber Estuary and/or the Lower Derwent Valley designated sites only, where potential impacts from loss of/disturbance to functionally linked land (FLL) have been identified, for example due to presence of suitable habitat (such as arable land/grassland or open waterbodies) and/or relevant bird records and/or local knowledge.

Natural England recommends that surveys are undertaken of the site and surrounding fields to provide an overview of bird usage during wintering and spring/autumn passage periods.

We recommend that the surveys are carried out in line with the following best practice guidance. Where alternative approaches are used, clear justification should be provided.

Please note that recommended survey periods, frequency and design may differ for sites located within the boundaries of Humber Estuary or Lower Derwent Valley designated sites, or in proximity to other designated sites. Please contact Natural England in such cases.

Survey periods and frequency

Natural England recommends that surveys are completed at the following frequency:

- Autumn Passage – two surveys per month between August to October inclusive.
- Winter - two surveys per month between October to March inclusive.
- Spring Passage – two surveys per month between March - Mid-May inclusive.

We advise that spring and autumn passage surveys are completed (in addition to winter surveys) as the Humber Estuary and Lower Derwent Valley SPAs are important for species migrating between breeding and wintering sites. Further advice on seasonality for Humber Estuary SPA and Lower Derwent Valley SPA designated features can be found at Designated Sites View (naturalengland.org.uk) and UK9006092 Lower Derwent Valley SPA Published 14 Sep 2023 (naturalengland.org.uk), respectively.

Weekly visits during the autumn and spring passage periods are recommended where birds are likely to be present in the migration period only, due to high turnover of birds during migration. Note that certain passage species, such as whimbrel associated with the Lower Derwent Valley SPA, may have specific survey requirements due to their migration behaviour. Please discuss such cases with Natural England.

Natural England recommends that two years of wintering and passage surveys should be completed in certain cases to provide a more robust understanding of SPA bird usage on the site and inform design of suitable mitigation, where relevant. This will depend on site-specific factors, for example where proposed development sites:

- are in very close proximity to the designated site/s; and/or
- have a large development footprint; and/or
- are expected/shown to have high bird sensitivity, especially where activity varies significantly between years; and/or
- existing bird records / expert advice demonstrates usage of the site by high numbers of SPA birds.

Please contact Natural England if you are unclear on whether two years of wintering and passage surveys are recommended for this proposal.

Survey design

Wintering/passage surveys should be designed to ensure that results are sufficient to provide a robust picture of distribution, abundance and regularity of use by waterbirds associated with the Humber Estuary and/or Lower Derwent Valley SPAs across the full extent of the proposed development site. Please refer to Annex B and/or Annex B1 for the non-breeding waterbird assemblage list for the Humber Estuary and Lower Derwent Valley SPA, respectively.

A detailed methodology should be included in the relevant report/s, including key information such as number of visits, date and time of visits, viewpoint locations and/or transect routes walked. The survey results should provide some understanding of how the birds use the site (for example, for roosting or foraging) as well as presence/ absence. We would expect to see commentary of birds landing and taking off within and outwith the development site. We also recommend recording birds in flight, particularly if the application may have the potential to affect bird flight lines.

Consideration should also be given to surveys in poor weather/ visibility conditions. Usual survey methodology is to avoid surveying in poor conditions due to potential reduced detectability of birds. However, use can vary in different weather conditions, so it may be helpful to carry on with surveys in poor weather. Weather conditions may affect the results of the surveys and therefore should be considered in assessing the robustness of the dataset.

In addition, details of wider weather conditions should be included, for example, where there may have been a particularly wet or cold season and this may change bird distribution across the area, due to frozen ground etc. Furthermore, a milder autumn may lead to wintering birds arriving later and vice versa in colder autumns.

The methodology should also consider whether the site has any seasonal features such as dips and low-lying areas that retain water at particular times, for example early in the season or in wet years. These areas may have importance for waders at these times, but if surveyed during a drier spell or where full passage/winter surveys have not been completed, it may be possible to underestimate the importance of the site.

For sites in close proximity to the Humber Estuary, the surveys should cover different tidal states. Use of sites closer to the estuary are more likely to be tidally influenced. For sites which may potentially affect high tide roosts, observations should be conducted from two hours before high tide to two hours after high tide. For sites where there are high tide roosts, it may be beneficial to have a series of counts at different heights of tides ('through the tide counts'), as some sites are only used on Spring tides and others are only used on Neap and low tides.

For sites in proximity to the Lower Derwent Valley, the surveys should cover different times of day and different flooding states in the valley. For example, during certain winter periods, the designated site may be extensively flooded and therefore usage of surrounding functionally linked land may be higher for wading birds.

The surveys should cover open arable land/grassland and any waterbodies within the proposed site boundary, as well as land adjacent to the development that could be affected and provides the potential to support designated site species. Where a site is adjacent to the Humber Estuary designated site, additional considerations may be required, for example

ensuring adequate surveys of intertidal habitats. Please contact Natural England in such cases.

Surveys may also need to take account of surveys at dusk and dawn, depending upon the bird species (i.e. geese and swans). If geese and swans have the potential to use the development site or surrounding area, we would expect to see surveys 1 hour before and 1 hour after, dusk and dawn during the respective bird survey season (i.e. winter, spring and autumn passage (as above)). These surveys should be in addition to the standard daytime survey but can be carried out on the same day. For example, a dawn survey to count geese or swans at their night-time roost could then extend into a survey of daytime use of fields for foraging.

Natural England generally recommends that observations from vantage points (VP) are used. VP surveys are considered preferable to walkover surveys for observing behaviour of birds on the ground (i.e., whether they are foraging/loafing etc.), and to minimise the risk of flushing birds due to movement of a surveyor during a walkover survey. Also, birds which may otherwise have landed in the field during the survey period may be unlikely to do so with the presence of a moving surveyor. If landscape features mean it is not possible to avoid walking through part of the survey area to get from one point count to another, this should be noted and the reaction of any birds present recorded, including any that are flushed.

Further guidance on vantage point surveys can be found at Recommended bird survey methods to inform impact assessment of onshore windfarms | NatureScot. Natural England recognises that the NatureScot VP guidance is written for impacts associated with wind turbines. However, Natural England considers that the survey guidance detailed in Section 3.7 provides an appropriate methodology to identify distribution and abundance of birds to inform the assessment of other developments. We acknowledge that some of the information regarding the required watch hours and height considerations etc will not be relevant in the context of other developments. Therefore, site-specific considerations should be taken into account when designing the survey methods.

Where VP surveys are not considered appropriate for a particular site, clear reasoning and justification regarding the alternative survey methods undertaken should be provided.

Natural England has generally advised that if ≥1% of a Humber Estuary bird species population could be affected by a proposal, alone or in combination with other plans or projects, then further consideration is required. However, where species are particularly vulnerable due to declines in the Humber population, then it may not be appropriate to rely on the 1% of the estuary population as the critical threshold. Mitigation measures may be required where lower numbers of vulnerable species are using a site that is proposed for development.

Nocturnal surveys

Wader and waterfowl usage of arable land/grassland outside designated sites can be substantially different at night. Therefore, Natural England recommends nocturnal surveys are also carried out if waders and/or waterfowl have the potential to use the development site. These surveys should be in addition to the standard daytime surveys. We recommend that several visits should be completed to determine if the site and/or surrounding areas play a regular role in supporting SPA species at night. Night vision/infra-red equipment and survey on moonlit nights can establish presence of nocturnal species or presence and direction of feeding/migration movements both by calls and by sight[1].

Guidance on nocturnal surveys can be found at Nocturnal bird surveys | Bird Survey Guidelines. The nocturnal survey design should take this guidance into account, and the approach should be justifiable in the assessment. It should be noted that for most species nocturnal activity is likely to be underestimated in any attempted survey[1].

[1] Scottish Natural Heritage: Recommended bird survey methods to inform impact assessment of onshore wind farms (March 2017- Version 2).

Growth and Regeneration Business Unit
Castle House
Great North Road
Newark
Nottinghamshire
NG24 1BY

www.newark-sherwooddc.gov.uk

Telephone: 01636 650000
Email: planning@nsdc.info

Date: 21 May 2024
Application ref: 24/SCO/00002

The Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN

By email to: SteepleRenewables@planninginspectorate.gov.uk

Dear Sirs,

Planning Act 2008 (As Amended) and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations)
Application by Renewable Energy Solutions (RES) (the Applicant) for an Order granting Development Consent for the Steeple Renewables Project (the Proposed Development)
EIA Scoping Opinion Request

I refer to the above and a communication received by the Council on the 24th of April 2024, providing a consultation notification by the Planning Inspectorate with regard to the above-mentioned project and the EIA Scoping request received from the applicant.

In its capacity as a Consultation Body, under the EIA Regulations (and a 'neighbouring' Planning Authority for this prospective NSIP project) Newark and Sherwood District Council have reviewed the available information publicised, notably the Scoping Report and the Associated Figures.

Following a review of the Scoping Report, we note that the applicant intends to consider the potential for cumulative effects and refers to both NSIP projects and planning applications within the 'host' planning authority administrative area of Bassetlaw District Council. At this stage, we can see no evidence of the consideration of the potential for cross boundary cumulative effects. Newark and Sherwood District Council are a 'host' authority for the One Earth Solar Farm NSIP project, which lies to the north of the district.

In the absence of any evidence that this has been taken into account, at this stage we would recommend that the consideration of the potential for cumulative effects also extends to beyond the immediate boundary of the host authority and in this case also consider the referenced NSIP project within the Council's district and vice versa. The potential for interactions between NSIP projects across local authority boundaries should be considered, along with the potential for 'in-combination' effects.

At this stage we can confirm that we have no further comments to make but look forward to receiving further formal consultations in due course on the project, in accordance with the provisions of the Planning Act 2008.

Please note that this matter has not been formally reported to the District Council's Planning Committee. In these circumstances the comments are those of an Officer of the Council under delegated power arrangements.

If you require any further assistance, please do not hesitate to contact my colleague, Simon Betts, the case officer who has dealt with this consultation, on 01636 655369.

Yours sincerely,

Lisa Hughes
Business Manager – Planning Development

From: [redacted]
To: Steeple Renewables Project
Cc: [redacted]
Subject: Scoping consultation - Steeple Renewables Project
Date: 24 April 2024 10:53:17

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Hello

I can confirm that Nottingham City Council does not have any comments regarding the scoping opinion.

Thanks

Matt Gregory
Head of Planning Strategy and Geographic Information
Growth and City Development
Nottingham City Council
Loxley House
Station Street
Nottingham NG2 3NG

[redacted]

This matter is being dealt with by:
Will Lawrence
T 0115 993 9388
E planning.policy@nottscc.gov.uk
W nottinghamshire.gov.uk

Nottinghamshire County Council

The Planning Inspectorate
Environment Services Operations Group 3

Sent by email to
SteepleRenewables@planninginspectorate.gov.uk

21st May 2024

Dear Sir

STEEPLE RENEWABLE PROJECT
SCOPING CONSULTATION AND NOTIFICATION

I am writing to respond to your letter of 23 April concerning the above. Nottinghamshire County Council has reviewed the content of the Environmental Impact Assessment (EIA) Scoping Report submitted by Renewable Energy Solutions and is responding as follows:

Chapter 8 - Ecology & Biodiversity

The proposed scope of Chapter 8 of the EIA Scoping Report looks appropriate, subject to the following minor points:

- In Nottinghamshire, SINCs (Sites of Importance for Nature Conservation) are now called LWSs (Local Wildlife Sites).

- It is believed that Curlew breed (or have recently bred) on Out Ings, and whilst this is outside the application site, the proposed Eastern Biodiversity Mitigation Area has the potential to be designed and managed for this species (and potentially other ground nesting birds), noting that Curlew is now a very rare breeding species in the Trent Valley.

- Impacts on Skylark in particular will need careful consideration and mitigation, with consideration given to the potential need for off-site measures such as the provision of Skylark plots on adjacent land.

Chapter 9 - Hydrology, Hydrogeology, Flood Risk & Drainage

The Lead Local Flood Authority (LLFA) has reviewed Chapter 9, which notes that for the operation phase a Flood Risk Assessment including a Surface Water Drainage Strategy has been scoped in and that flood risk during the construction phase has been scoped in. The LLFA would support this course of action, to ensure that neither increase the local flood risk.

Chapter 10 - Cultural Heritage

From an archaeological perspective, the County Council is generally supportive of the programme presented in Chapter 10 of the EIA Scoping Report but has several comments to make, as set out below, and would suggest that much greater detail is required.

The area of the scheme is in the direct hinterland of the largest Roman town in Nottinghamshire, one of the most significant outliers of Lindum, and extends either side of the major Roman road from Lindum to Danum. There is known roadside development at Segelocum which was identified a few years ago by a local community project, and those remains are of comparable significance to the adjacent Scheduled Monument (and therefore potentially Schedulable). It is not currently known how far those remains extend towards Sturton. There is plenty of evidence suggesting the town's hinterland is occupied by a patchwork of farms that will have been overseen by administration from villa-type sites. Finds from a former farmer near North Leverton suggest that there may be one of these sites in the vicinity of North Leverton Windmill, though the exact nature and location is unknown. There are certainly villas within the hinterland of the town but they have not yet been identified. Equally the Medieval history of the area is relatively complex, with Sturton, the Wheatleys and Fenton sharing 10 manors between them at the time of Domesday. These manors are not necessarily in the nucleated villages and may be represented by isolated farmsteads or identifiable in the landscape by unusual field boundaries. One of them may be represented by a collection of earthworks directly SE of Sturton; a moated site and house plots of probably Medieval date. This site shares similarities with the Scheduled moated site of Hayton Castle located NW of North Wheatley. Due to the high potential for significant archaeological remains within the scheme area it will be vital that good baseline data on the archaeological resource is obtained at an early stage. There is the potential for substantial impacts from archaeology that may have knock-on effects.

The Environmental Impact Assessment (EIA) will require desk-based research, non-intrusive surveys, and intrusive field evaluation for the full extent of the proposed impact. This should include connector route corridors and areas proposed to be set aside for biodiversity. Areas of archaeological interest and any subsequent mitigation have the potential for significant impacts to the scheme and in-turn deliverability. Sufficient evaluation is essential for informing the archaeological potential and significance, and the design and mitigation with an understanding of the level of archaeological work that may be required before and during the construction phase. It will also feed into any required archaeological management plan should preservation in-situ be a suitable mitigation option.

The Council also has some comments on specific parts of the text within the report:

- 10.2, study area, it is worth keeping in mind the very low-lying topography of the Trent Valley when taking into account the impacts on setting of assets over a wide area. Using the Zone of Theoretical Visibility is a useful starting point but I am pleased to see it acknowledged that visibility is not the only factor to be taken into account when considering impacts to the setting of an asset.

- 10.4.2 notes that the scheme is a limited time operation, but it will have an impact on the readability of the historic landscape for more than a generation and impacts to buried archaeology will be permanent and irreversible.

- 10.4.4 states that the scheme will have no significant effect on non-designated heritage assets as the impacts of the scheme are relatively small. This is incorrect. The cumulative impacts of solar schemes on archaeological remains and their setting, and on the historic landscape, have been very much underestimated because of this notion.

The mitigation options may be more flexible than on some other forms of development, but the impacts to archaeology are comparable, and the mitigation options require greater detail on the archaeological resource before suitable options can be determined. Piling, cable trenching, associated infrastructure, and activities associated with the construction, operation and decommissioning of the site all have impacts, some of which are highly intrusive. There are also unknowable, or at least hard-to-predict, impacts from future refits or upgrades.

- 10.4.5 There may be assets of equivalent value to designated assets that are encountered during the evaluation. It may be that some sites warrant Scheduling (such as the roadside development at Segelocum), and the NPPF footnote 72 notes that 'non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets'. Good baseline data on the archaeological resource will allow the scheme to avoid direct physical impacts to designated assets or those of equivalent significance, and impacts to their setting.

- 10.5 The significance and impacts cannot be assessed without adequate baseline data.

- 10.5.7 The inclusion of Retford and Worksop libraries in the list of data sources is welcomed. Please also consider Retford Museum as this is where many of the historic finds from the area have been deposited. In addition, the Osberton Estate may have relevant archive material. The Portable Antiquities Scheme should also be consulted.

- 10.5.13 As mentioned above the geophysical survey will need to be supported by other forms of evaluation in order to provide adequate baseline information. I am pleased to see the arrangement for the geophysical survey is underway.

- 10.7.1 Design changes can be an effective way of avoiding impacts and the Council will be happy to discuss any with regard to archaeology once the baseline data is available.

- 10.7.2 For areas where preservation in-situ is proposed understanding the asset and its significance will be crucial in informing what the mitigation and/or management looks like.

- 10.7.3 Being so close to such a significant Roman town the residents of the villages draw some of their identity and sense of place from the heritage in their landscape. A Heritage Lottery funded project a few years back was how the moated site by Sturton was identified, as well as the roadside settlement associated with Segelocum. There is a long history of amateur archaeology and general interest in archaeology in the area. There is no public benefit to the destruction of archaeology, and many opportunities here to enhance understanding and protection of the archaeology for those affected by the scheme.

In conclusion the EIA will require a comprehensive suite of evaluation including desk-based assessment, non-intrusive surveys and intrusive field evaluation for the full extent of the proposed impact. The results should be used to minimize the impact on the historic environment through informing the project design and an appropriate scheme of mitigation. The provision of sufficient baseline information to identify and assess the impact on known and potential heritage assets is required by Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (Regulation 5 (2d)), National Planning Statement Policy EN1 (Section 5.8), and the National Planning Policy Framework.

In terms of built heritage conservation, the Council also has the following comments:

- Figure 7.1 (Drawing number P22-1144_EN_08) shows the location of visual receptors (LVIA viewpoints) within the SZTV. These have not been discussed with the Council's Conservation Team and it would like to examine the decisions for the proposed locations with the Pegasus Group. The Council's Conservation Team would like to see additional receptors to the south of the 2km buffer, within the SZTV, to enable an appreciation of impacts on the setting of various built heritage assets.

- 'NCC Building Conservation' should be included at Paragraph 10.5.11 where it lists the heritage stakeholders that will be consulted during the baseline PEIR/ES completion process.

- The proposed methodology for examining and reporting impacts is acceptable. When exercising 'professional judgement' (as referred to in paragraph 10.5.22) it is recommended that this is based on consensus (amongst stakeholders) as far as it is possible to achieve.

Chapter 14 - Transport & Access

The County Council is satisfied with the proposed approach to assessing the impact of the proposal on the highway network and will engage further with the applicant in due course.

I hope these responses are helpful.

Yours sincerely

Will Lawrence MRTPI
Planning and Infrastructure Manager
Planning Policy
Nottinghamshire County Council

From: [redacted]
To: Steeple Renewables Project
Subject: RB2024/0600 - Steeple Renewables Project - EIA Scoping Opinion
Date: 01 May 2024 07:51:34
Attachments: image001.jpg
image002.png

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FAO Ian Wallis

Due to the distance of the site away from the boundary of the Borough the Local Planning Authority has no comments to make.

Kind Regards

Sandra Arnold
Principal Planning Officer
Development Management
Regeneration & Environment
Rotherham Metropolitan Borough Council

[redacted]

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STURTON LE STEEPLE PARISH COUNCIL

I am writing on behalf of Sturton le Steeple Parish Council, which represents the view of the residents of the parish of Sturton le Steeple and surrounding areas affected by the Steeple Renewables Project.

The local community set up an independent working party known as Fields for Farming, writing to all residents asking for their feedback on the planning proposal. The Parish Council would like to present this feedback and fully support its outcomes.

Residents overwhelming objected to the proposed construction of a large solar farm on the designated agricultural land in our community. **745** responses were received with **739** opposed and 6 supporting, that a **99.2%** objection rate. While as a Parish Council we recognize the importance of renewable energy, the chosen location for this project raises several significant concerns for our residents as detailed in the survey.

Sturton Ward Neighbourhood Plan

The Sturton Ward Neighbourhood Plan was consulted upon widely with residents and businesses and approved by referendum in 2016. Since that there have been significant changes in UK energy policy with the closure of the coal fired power station at Cottam and the subsequent closure of West Burton Power Station. The Sturton Ward Neighbourhood Plan Review updates a number of policies including landscape policies to provide more policy protection for parts of the Ward most valued by the community.

Paragraph 18.5 refers particularly to solar energy production, and states…

“On appropriate sites in the countryside, the use of solar energy is supported provided the development: a) is effectively screened from view; and b) does not harm the landscape character of the Ward; and c) is supported by a comprehensive package of ecological mitigation and enhancement measures.

Paragraph 18.6 states… “The need to safeguard heritage assets and landscape character will be a key consideration in any renewable energy proposal”

Whilst the Parish Council appreciates that this proposal will be decided at the national level, It is clear that it does not conform to local planning policy guidelines and would be rejected if determined at a local level.

Residents Comments

“It seems ridiculous to me that this issue is not being managed strategically across the entire country. The Government have allowed this to become a free-for-all”.

Loss of countryside / wildlife habitat

95.7% of surveys returned showed concern for the loss of countryside and wildlife habitat. The environmental impact on local wildlife cannot be overlooked. The area is home to various species, many of which could be disturbed or displaced by the construction and operation of the solar farm. The disruption of habitats and natural ecosystems poses a significant risk to biodiversity and the overall environmental health of our region.

90.1% expressed concerns about the impact on the landscape. The proposed solar farm spans a vast area, disproportionately large relative to the size of our community. This extensive footprint will inevitably lead to the transformation of a considerable portion of our landscape, fundamentally altering the character and aesthetics of our rural environment. Alteration of land use will have a profound impact on local wildlife habitats, water drainage patterns, and soil integrity. Our community prides itself on its scenic, open spaces and agricultural heritage, both of which are threatened by the imposing scale of this development.

Residents Comments

"We need to preserve hedgerows and field for wildlife".

"Skylark, Yellowhammer and Grey Partridge all breed in these fields. They are red listed birds (endangered) and should not be disturbed

Loss of farmland for food Production

95.2% of residents object because the land earmarked for this solar farm is currently used for farming and food production. Our agricultural sector is vital not only for local food supply but also for supporting the livelihoods of numerous families in our area.

Residents Comments

"This Area has become a target for renewable energy companies. Good quality agricultural land should not be used for this purpose".

"Us young people can see that it is very short sighted to think solving the 'energy crisis' with taking food production sites for solar is not logical, and there are other locations. Sturton does enough for industry"

"It is not sensible to sacrifice food security for energy security where there are obvious alternatives. The decision is based upon personal profit without regard to local or national interests".

"This proposal is far too big, it completely engulfs one village and would mean that the land in our parish would be 90% industrialised. It is a rural farming area and should remain so. Fields are for food not solar panels".

"New homes should be made to have solar panels when building and agricultural land for crops".

"The countryside is too valuable for food production. Solar is unreliable and a poor producing alternative to wind power. The scale of the scheme is just outrageous".

Loss of Agricultural Jobs

86.7% of residents were concerned about the loss of jobs. The chosen site for the solar farm is currently productive agricultural land that supports a variety of crops. This land is not only crucial for local food production but also forms the backbone of our rural economy. The transformation of productive farmland into a solar energy site will inevitably lead to the loss of agricultural jobs, affecting those who rely on this industry for their income. This shift could have devastating economic consequences for our rural community.

Residents Comments

"Use Solar on all new build houses and all industrial sheds/railway stations etc, not on our natural productive biodiverse farming land. You are killing jobs and the environment with this greed and shorted sighted vision".

Density of existing developments in the area (Nuclear Fusion project, Quarry, National Grid Upgrades. Other large solar projects)

82.3% of resident expressed concern over the volume of project presently going through the planning process. It has been estimated that if RES were to go ahead 90% of the parish would be industrialised which will have a significant impact on everyone living in the parish.

Residents Comments

"The pylons for the National Grid upgrade are bad enough. We don't need to take on any more of this in this area. Enough is Enough"

"West Burton Power Station worked hard to maintain good relations with our local community. This proposal outrageously swamps, destroys and invades the local area. It feels like a slap in the face and is very upsetting"

"We can't bear to imagine being completely surrounded".

"This proposal will have a catastrophic impact on the local communities and also productive farmland. The sheer size and location is disgusting and disrespectful".

"The agricultural land and green landscape needs to be preserved for future generations and the longevity and protection of the environment".

"RES disregard any criteria that will have an effect on the community financially, environmentally, quality of life, visual aspect etc. They have swamped this are because of easy access to the grid so more profit for them".

Increased traffic during the construction

75.8% of residents had severe concerns about the increase in traffic during the construction phase. A large-scale project like the one proposed will bring an influx of heavy machinery and increased traffic to our small, rural community. Our infrastructure is not equipped to handle the massive increase in traffic, which will not only disrupt daily life but also

pose safety risks to residents and schools. The noise, dust, and general disturbance during the construction period will negatively affect the quality of life for those living nearby.

Residents Comments

“This will drastically change the countryside where we live, the traffic through the village is already causing terrible damage and construction traffic will be horrendous”.

Climate Change

A number of residents commented on climate change and the ‘bigger picture’. Here are some examples:

“Importing food and drink from overseas does nothing to reduce climate change. Reducing the amount of space for food production would only increase food mileage and could negate the good created by solar energy. Development of brownfield sites for industry or housing should include a clause for solar energy to be incorporated”

“All new houses by law have to have certain levels of insulation to reduce heat loss. All new houses by law should also have solar panels on roofs”.

“Solar panels are not green. How are they made? Where do the materials come from? We are sold a lie!”

“We need to keep all the farmland free from development of all kinds if we want to be a substantial country. Crops are failing all over the world and with climate change the position will only get worse”.

“The amount of land suitable for agriculture on our planet is fairly fixed and we are already reaching the limit to its ability to feed us. Climate change and building developments are reducing the available agricultural land year on year, so further reducing it by deliberately covering it with solar panels rather than on buildings, is clearly insane. This is being done for short term profit with no thought for the future”.

Sturton le Steeple parish council represents its residents by voicing their concerns and aspirations at the local government level. We are responsible to our residents for addressing issues of planning, traffic, and public safety. It is for these reason that the Parish Council of Sturton le Steeple is strongly opposed to the proposal by RES for a solar farm in our parish.

Andrew Frankish

Chair, Sturton le Steeple Parish Council.

.

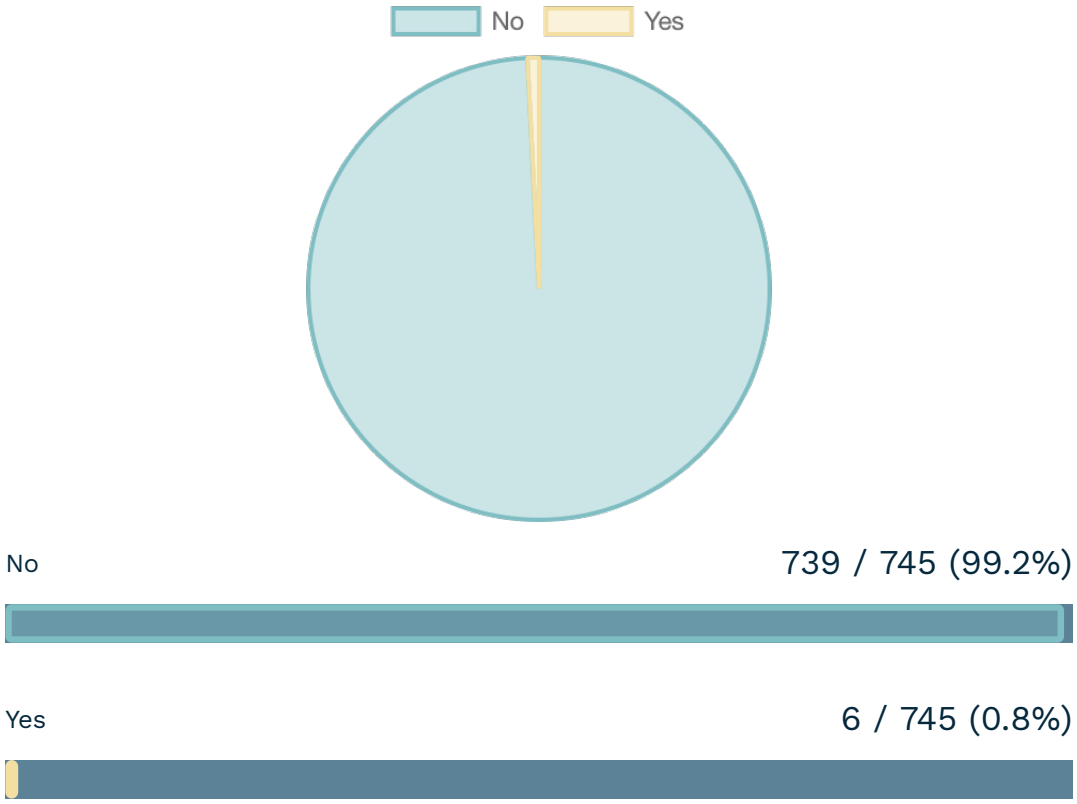
Report for “Fields For Farming”

May 20th 2024, 1:44:26 pm

This form has been submitted a total of **745** times.

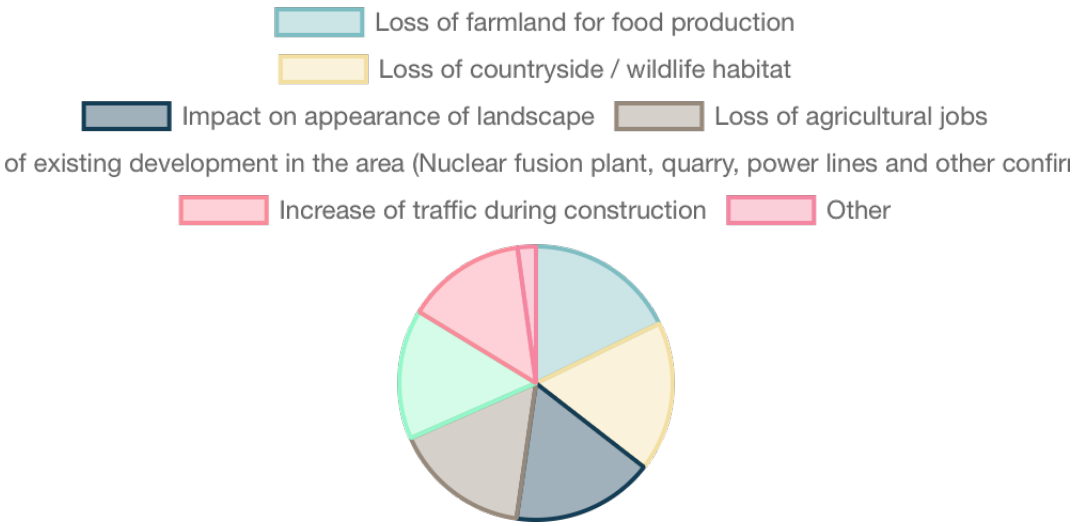
Do you support RES’ proposals to take over 1,600 acres out of agricultural production within the local area* for use as a solar farm?

745 out of **745** people answered this question.



If no, for what reason(s) do you oppose the development?

739 out of **745** people answered this question.



Loss of farmland for food production — 713 / 745 (95.7%)

Loss of countryside / wildlife habitat — 709 / 745 (95.2%)

Impact on appearance of landscape — 671 / 745 (90.1%)

Loss of agricultural jobs — 646 / 745 (86.7%)

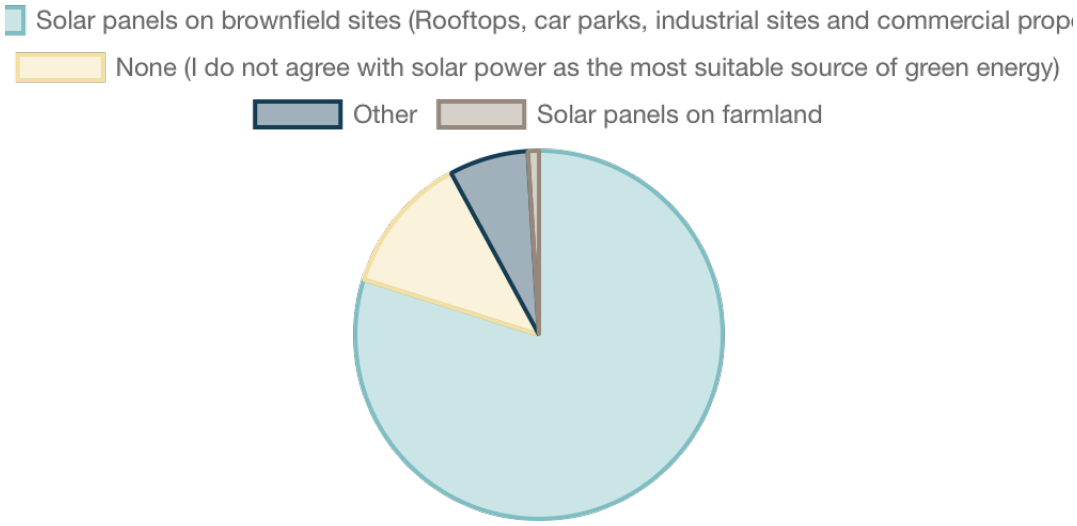
Density of existing development in the area (Nuclear fusion plant, quarry, power lines and other confirmed solar farms) — 613 / 745 (82.3%)

Increase of traffic during construction — 565 / 745 (75.8%)

Other — 87 / 745 (11.7%)

Which areas do you support as locations for solar energy production?

745 out of **745** people answered this question.



Solar panels on brownfield sites (Rooftops, car parks, industrial sites and commercial properties)	654 / 745 (87.8%)
None (I do not agree with solar power as the most suitable source of green energy)	100 / 745 (13.4%)
Other	57 / 745 (7.7%)
Solar panels on farmland	8 / 745 (1.1%)