



Planning Inspectorate
Arolygiaeth Gynllunio

SCOPING OPINION:

Proposed Humberhead Solar

Case Reference: EN0110032

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

06 July 2026

TABLE OF CONTENTS

1.	INTRODUCTION.....	1
2.	OVERARCHING COMMENTS.....	3
2.0	Description of the Proposed Development.....	3
2.1	EIA Methodology and Scope of Assessment	5
3.	ENVIRONMENTAL ASPECT COMMENTS.....	10
3.1	Health.....	10
3.2	Climate Change.....	14
3.3	Landscape and Visual.....	16
3.4	Biodiversity	22
3.5	Water Environment.....	34
3.6	Cultural Heritage	39
3.7	Transport and Access	42
3.8	Noise and Vibration	46
3.9	Socio-Economics.....	49
3.10	Air Quality.....	51
3.11	Soils and Agriculture	54
3.12	Materials and Waste.....	57
3.13	Glint and Glare	60
3.14	EMF.....	63
3.15	Ground Conditions	65
3.16	Major Accidents and Disasters	67
3.17	Arboriculture.....	69
3.18	Telecommunications and Utilities.....	70
 APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED		
 APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES		

1. INTRODUCTION

- 1.0.1 On 26 May 2026, the Planning Inspectorate (the Inspectorate) received an application for a Scoping Opinion from Humberhead Solar Limited (the applicant) under regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) for the proposed Humberhead Solar (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:
- https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN0110032-000010-HumberheadSolar_ScopingReport.pdf
- 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 pages, 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:

['Nationally Significant Infrastructure Projects: Advice pages'](#)

- 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

(Multiple sections of the Scoping Report)

ID	Ref	Description	Inspectorate's comments
201	N/A	Proposed development capacity	The Scoping Report does not provide an indication of the maximum generating power or capacity of the solar farm beyond being over 100 megawatts (MW). The ES should provide an indication of the technical capacity of the proposed development. Information regarding the grid connection agreement should be provided, including the anticipated total power agreement.
202	Para 1.1.7	Land required for access	The Scoping Report indicates that the red line boundary of the proposed development may be changed to accommodate access requirements. The ES should identify the extent of land that is required for access, and if this is included or excluded from the red line boundary.
203	Table 4-1	Switchgear	Details on the type of switchgear used in the proposed development for the conversion units, at the substation and the Battery Energy Storage System (BESS) should be included as part of the ES. Should a gas insulated switchgear option be chosen for the inverters, the use of sulphur hexafluoride (SF ₆) should be avoided, if possible, in line with National Policy Statement (NPS) for Electricity Networks Infrastructure (EN-5).
204	Para 4.4.13	Location of electrical infrastructure	The Inspectorate notes that the 400kV substation(s) are proposed to be sited on Humberhead sites 1-1, 1-2, 2-1, 3-1, 3-2, 4-1, 4-3 and/ or 4-7. The ES should confirm how many 400 kilovolt (kV) substations are required. The Inspectorate notes that some of these sites are in Flood Zone 3. The ES should provide justification for the siting of electrical infrastructure and explain how the risk of electrical failure due to flooding will be managed.

ID	Ref	Description	Inspectorate's comments
			The ES should confirm the number and locations of all electrical infrastructure, including the substations and BESS, with an explanation of how their location has been selected with consideration to environmental constraints.
205	N/A	Piling	The ES should describe the location and methods applied for piling activities and explain any assumptions made in this regard. Any likely significant effects should be assessed using worst-case parameters and any proposed mitigation measures described. The maximum depth to which piling is required should be stated and justified in the ES, including that required for the BESS and on-site substations.
206	N/A	Other NSIPs	The Inspectorate notes that the scoping boundary appears to overlap with the red line boundary for the NSIP Mylen Leah Solar Farm. The ES should explain how overlapping land will be managed and justify why these areas are included in the red line boundary of this proposed development.
207	N/A	Agricultural land	The ES should contain a clear tabulation of the areas of land in each Best Most Versatile (BMV) classification to be temporarily or permanently lost as a result of the proposed development, with reference to accompanying map(s) depicting the grades. Specific justification for the use of the land by grade should be provided. Consideration should be given to the use of BMV land in the applicant's discussion of alternatives.

2.1 EIA Methodology and Scope of Assessment

(Multiple sections of the Scoping Report)

ID	Ref	Description	Inspectorate's comments
21.1	Paras 3.3.9, 3.3.13	Humberhead Sites 2-1 and 3-3	Paragraphs 3.3.9 and 3.3.13 of the Scoping Report state that Humberhead sites 2-1 and 3-3 are “excluded from the scoping site boundary” as they contain wind turbines. The Inspectorate is unclear as to how this statement has been applied, as these sites are referred to several times throughout the Scoping Report. If these sites have been excluded from the assessments undertaken to inform the scoping exercise, this should be explained in the ES. The assessments in the ES should be based on complete information where possible; where this is not possible, justification should be provided. The ES should explain the purpose of all areas proposed to be included within the red line boundary.
212	N/A	Decommissioning phase effects	In several chapters of the Scoping Report, it is proposed that decommissioning phase effects are scoped out of the assessment. The Inspectorate acknowledges that effects during the decommissioning phase are of a similar or lesser magnitude than those experienced during the construction phase. However, while the Inspectorate considers that, though a separate assessment of such decommissioning phase effects may be unnecessary, there may be differences in significance of effects during construction and decommissioning and where this is the case should be commented upon in the ES. The applicant should take care not to conflate the absence of a separate decommissioning phase assessment and the absence of a likely significant effect.
213	N/A	Duration of effects	The Scoping Report uses a variety of durations to define short-, medium-, and long-term effects. For example, the Transport and Access chapter

ID	Ref	Description	Inspectorate's comments
			defines a short-term effect as between 0 to 5 years in duration, and the Socioeconomics chapter defines a short-term effect as between 0 to 1 year. The Inspectorate acknowledges that the definitions of these timeframes may vary for each environmental aspect. However, the ES should provide justification for the duration definitions used with reference to relevant guidance, and with consideration of the construction and decommissioning phase anticipated to take a maximum of 24 months each.
214	N/A	Solar panel cleaning	It is not clear whether the ES has considered the effects of cleaning the solar photovoltaic (PV) panels, including the vehicles or equipment used, water demand, and the run-off of cleaning materials into the environment. The applicant's attention is drawn to comments from the Environment Agency (EA) at appendix 2 of this Opinion regarding this activity and the potential for interaction between the cleaning fluid and panel coating. The ES and relevant operational management plans should describe how solar panel cleaning will be managed and effects mitigated.
215	N/A	Use of professional judgement	Where relevant, the ES should clearly explain how professional judgement has been used to assign impact magnitude and overall effect significance, noting that the proposed criteria may not be based on defined thresholds so will involve subjective decisions.
216	Para 14.6.39	Outline plans	The Scoping Report proposes the use of outline management plans to describe how activities will be managed and effects mitigated. For example, paragraph 14.6.39 states that the outline Operational Environmental Management Plan (oOEMP) will be developed into a detailed OEMP following the grant of the Development Consent Order (DCO). The applicant should ensure that all outline management plans submitted at the application stage are sufficiently detailed to allow the Inspectorate to consider whether sufficient management and mitigation is

ID	Ref	Description	Inspectorate's comments
			in place. The mitigation proposed should be based on guidance and proven to be effective where possible. The applicant's attention is drawn to comments from the EA at appendix 2 of this Opinion regarding the scope and level of detail required in the outline management plans.
21.7	N/A	Operational activities, including solar panel cleaning	The ES should ensure that all operational activities are included within relevant operational phase assessments. For example, if livestock grazing is retained as a vegetation management option, the effects of this activity should be included in assessments where appropriate. Similarly, it is not clear whether the ES will consider the effects of cleaning the solar panels, including the vehicles or equipment used, water demand, and the run-off of cleaning materials into the environment. The applicant's attention is drawn to comments from the EA at appendix 2 of this Opinion regarding this activity and the potential for interaction between the cleaning fluid and panel coating. The ES and relevant operational management plans should describe how solar panel cleaning will be managed and effects mitigated.
21.8	Section 2.12	Parameters-based approach	The Inspectorate notes the applicant's desire to incorporate flexibility into their dDCO and its intention to apply a parameters-based or 'Rochdale Envelope' approach for this purpose. 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 parameters should use the maximum envelope to ensure a worst-case assessment. The ES should describe the parameters assumed as the worst-case scenario for each aspect scoped into the assessment and

ID	Ref	Description	Inspectorate's comments
			ensure that interactions between aspects are taken into account relevant to those scenarios. The development parameters should be clearly defined in the dDCO and in the accompanying ES. The applicant, in preparing an ES, should consider whether it is possible to robustly assess a range of impacts resulting from many undecided parameters. The description of the proposed development in the ES must not be so wide that it is insufficiently certain to comply with the requirements of Regulation 14 of the EIA Regulations. The Inspectorate draws the applicant's attention to Advice Note 9: Rochdale Envelope, which states that "it will be for the authority responsible for issuing the development consent to decide whether it is satisfied, given the nature of the project in question, that it has 'full knowledge' of its likely significant effects on the environment." Table 4-1 provides the anticipated parameters for elements of the proposed development. However, not all of the essential parameters are provided. For example, the height of the BESS is not described. The ES should provide the maximum parameters for all elements of the proposed development and ensure that the assessments in the ES are based upon these.
219	Section 16.2 Appendix 1-B	Transboundary	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

ID	Ref	Description	Inspectorate's comments
			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 Page 'Nationally Significant Infrastructure Projects: Advice on Transboundary Impacts and Process', links for which can be found in paragraph 1.0.7 above.

3. ENVIRONMENTAL ASPECT COMMENTS

3.1 Health

(Scoping Report section 5)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.1.1	Table 5.2	Lower levels of physical activity because of reduced opportunities for active travel or access to open space (all phases)	The Scoping Report proposes to scope out this impact during construction and decommissioning on the basis that these effects will be assessed under 'transport modes, access and connections' and 'open space, leisure and play', which are scoped into the health assessment in the ES for the construction and decommissioning phases. The Scoping Report proposes to scope out this impact during operation on the basis that all public rights of way (PRoW) will be retained and there are unlikely to be any significant effects on physical activity. The Inspectorate is in agreement with this approach.
3.1.2	Table 5.2	Risk-taking behaviours (all phases)	The Scoping Report proposes to scope out this impact on the basis that the proposed development is unlikely to affect risk taking behaviour. The Inspectorate is in agreement with this approach.
3.1.3	Table 5.2	Impact to diet and nutrition (all phases)	The Scoping Report proposes to scope out this impact on the basis that the proposed development is unlikely to affect diet and nutrition. The Inspectorate is in agreement with this approach.
3.1.4	Table 5.2	Impact to adequate affordable housing and living conditions (all phases)	The Scoping Report proposes to scope out this impact on the basis that the proposed development is unlikely to affect housing provision or quality of housing during construction. However, table 13-2 states that most of the construction and decommissioning workforce are expected to be comprised of relocated workforces. The Scoping Report does not provide an indication of the expected number of staff required during the construction and decommissioning phases.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			Accordingly, the Inspectorate is not in a position to scope this matter out. The ES should include an assessment of these effects or demonstrate agreement with the relevant consultation bodies and the absence of a likely significant effect.
3.15	Table 5.2	Relocation (all phases)	The Scoping Report proposes to scope out this impact on the basis that the proposed development is unlikely to necessitate relocation. The Inspectorate is in agreement with this approach.
3.16	Table 5-3	Open space, leisure and play (operation)	The Scoping Report proposes to scope out this impact during the operational phase on the basis that all PRoW will be retained during this phase and the proposed development would not result in the loss of public open space, leisure or recreational facilities. The Inspectorate is in agreement with this approach. The ES should describe the extent and management of any diversions or delays to PRoW, including any visual or amenity effects to users. Cross-references between chapters in the ES should be considered to avoid duplication.
3.17	Table 5-3	Disrupted access to transport (operation)	The Scoping Report proposes to scope out this impact during the operational phase on the basis that all PRoW will be retained, vehicle movements will be limited, and other transport effects are assessed in the Transport and Access chapter. The Inspectorate is in agreement with this approach.
3.18	Table 5-3	Impact on community identity, culture, resilience and influence (operation)	The Scoping Report proposes to scope out this impact during the operational phase on the basis that operational staffing will be minimal and the potential for disruption or demand on services is negligible. The Inspectorate is in agreement with this approach.
3.19	Table 5-3	Community safety (all phases)	The Scoping Report proposes to scope out this impact on the basis that the proposed development is unlikely to affect community safety. The Inspectorate is in agreement with this approach.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.1.10	Table 5-3	Reduced social participation, interaction and support (all phases)	The Scoping Report proposes to scope out this impact on the basis that the proposed development is unlikely to affect social participation, interaction and support. The Inspectorate is in agreement with this approach.
3.1.11	Table 5-3	Education and training (all phases)	The Scoping Report proposes to scope out this impact on the basis that although there is potential for increased access to education and training opportunities, the beneficial effects are unlikely to be significant. The Inspectorate is in agreement with this approach.
3.1.12	Table 5-3	Employment and income (all phases)	The Scoping Report proposes to scope out this impact on the basis that although there is potential for increased access to employment opportunities, the beneficial effects are unlikely to be significant. The Inspectorate is in agreement with this approach.
3.1.13	Table 5-3	Health impacts associated with climate change (all phases)	The Scoping Report proposes to scope out this impact on the basis that these effects will be assessed in the Climate Change chapter. The Inspectorate is in agreement with this approach.
3.1.14	Table 5-3	Air quality health impacts (all phases)	The Scoping Report proposes to scope out this impact on the basis that these effects will be assessed in the Other Environmental Matters (Air Quality) chapter. The Inspectorate is in agreement with this approach.
3.1.15	Table 5-3	Exposure to contaminated water and ecological degradation (all phases)	The Scoping Report proposes to scope out this impact as a result of reduced water quality or availability on the basis that these effects are assessed in the Water Environment chapter. The Inspectorate is in agreement with this approach.
3.1.16	Table 5-3	Health impacts associated with contaminated soils (all phases)	The Scoping Report proposes to scope out this impact on the basis that the proposed development is unlikely to affect land quality. The applicant's attention is drawn to box 3.15.1 of this Opinion. In the absence of information regarding the presence or absence of contaminated land, the Inspectorate cannot scope this matter out. The ES should

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			include an assessment of these effects or demonstrate agreement with the relevant consultation bodies and the absence of a likely significant effect.
3.1.17	Table 5-3	Radiation (all phases)	The Scoping Report proposes to scope out this impact on the basis that these effects are assessed in the Other Environmental Matters (EMF) chapter. The Inspectorate is in agreement with this approach.
3.1.18	Table 5-3	Reduced capacity of health and social care services (operation)	The Scoping Report proposes to scope out this impact during the operational phase on the basis that the operational workforce is expected to be minimal. The Inspectorate is in agreement with this approach.
3.1.19	Table 5-3	Disruption to the built environment (all phases)	The Scoping Report proposes to scope out this impact on the basis that the proposed development is unlikely to result in human health effects relating to the built environment. Considering that health effects associated with reduced access are scoped into the assessment, the Inspectorate is in agreement with this approach.
3.1.20	Table 5-3	Disruption or reduced access to wider societal infrastructure and resources (all phases)	The Scoping Report proposes to scope out this impact on the basis that there are not anticipated to be any effects apart from those on social infrastructure which are scoped into the assessment. The Inspectorate is in agreement with this approach.

ID	Ref	Description	Inspectorate's comments
3.1.21	N/A	Impact to businesses, landowners and agriculture	The Scoping Report does not state how much agricultural land is proposed to be used or disturbed because of the proposed development. The Inspectorate considers that these receptors may experience severance and reduced access to land. The ES should assess the impact to businesses and landowners, particularly agricultural businesses. Where relevant, measures should be secured within the DCO to ensure farmers and other landowners' ability to access their land is not hindered.

3.2 Climate Change

(Scoping Report Section 6)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
321	Para 4.4.8, tables 6-3, 6-4, 6-6	Climate change risk assessment (CCRA)	The Scoping Report proposes to scope out a standalone CCRA on the basis that the proposed development incorporates climate resilience measures and relevant climate change considerations addressed within topic chapters. The Inspectorate is in agreement with this approach. With respect to temperature change, the Scoping Report states that the solar PV technology is designed to operate across a wide temperature range. The Scoping Report does not state whether the BESS and other electrical infrastructure such as substations are also able to tolerate at least the maximum projected temperatures for the lifetime of the proposed development. The ES should describe the temperature tolerance of all elements of the proposed development and confirm whether this infrastructure can tolerate the projected temperatures for the lifetime of the proposed development.
322	Table 6-6	Decommissioning phase greenhouse gas (GHG) effects	The Scoping Report proposes to scope the decommissioning phase out of the Lifecycle GHG assessment on the basis that GHG emissions associated with this phase are anticipated to be temporary and limited in scale and significant effects are unlikely, and that decommissioning activities will be managed through an outline Decommissioning Environmental Management Plan (oDEMP). The Inspectorate is in agreement with this approach.
323	Table 6-6	In-combination Climate Impact Assessment (ICCI)	The Scoping Report proposes to scope out a standalone ICCI on the basis that no likely significant in-combination effects are anticipated and climate change will be considered where relevant within topic-specific assessments. The Inspectorate is in agreement with this approach.

ID	Ref	Description	Inspectorate's comments
324	N/A	Peat	The Scoping Report identifies areas of peat soil within the scoping boundary. The applicant is advised to consider the climate effects of disturbing or damaging peat soil. The emissions relating to disturbance of peat soil should be included in the GHG assessment if these areas are to be included within the works. The applicant's attention is drawn to comments from the EA at appendix 2 of this Opinion regarding the methodology used to characterise and assess peat soil.
325	Table 6-1	Climate baseline data	The Scoping Report proposes to use historical climate data from the UK Met Climate Portal for the period 1981 to 2010. The Inspectorate acknowledges that certain climate metrics are not available for more recent time periods but the applicant should make every effort to obtain the most recent robust data for as many metrics as possible to ensure that the baseline is representative of current climatic conditions.
326	N/A	Risk from wildfire	The Scoping Report does not include discussion of the increased risk of wildfire in future climate scenarios. The ES should describe how the risk of wildfire across the proposed development, particularly at the locations of electrical infrastructure, is mitigated and managed. Measures taken should be described in management plans where relevant.
327	Para 4.4.8	Impacts from precipitation change	The Inspectorate notes in paragraph 4.4.8 that tracking panels are proposed to be stored horizontally overnight. The applicant is advised to consider the increased risk of panel damage from increased rainfall, hailstones and other climatic conditions and events.
328	Table 5-3	Health impacts associated with climate change	Table 5-3 of the Health chapter states that health impacts associated with climate change will be assessed in the Climate Change chapter. The Climate Change chapter of the Scoping Report does not clearly indicate whether health impacts will be considered. The ES should include an assessment of this matter; cross-references to other chapters should be considered.

3.3 Landscape and Visual

(Scoping Report section 7)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
331	Para 7.4.9	Visual receptors within 1 kilometre (km) study area – no intervisibility (all phases)	The Scoping Report states that visual receptors within the 1km study area with no intervisibility of the main solar sites would be scoped out of the landscape and visual impact assessment (LVIA). The Inspectorate notes that table 7-2 makes no reference to this in the elements scoped out; however, the Inspectorate agrees that this matter can be scoped out of the assessment.
332	Paras 7.4.13, 7.4.14, 7.4.17, table 7-2	Visual receptors outside 1km study areas with no direct, extensive and/ or open views (all phases)	The Inspectorate agrees that visual receptors outside of the 1km study area can be scoped out of the assessment on the basis that these receptors would have no direct, extensive and/ or open views.
333	Paras 7.4.13 to 7.4.17, table 7-2	Visual receptors beyond the 2km study area (all phases)	The Inspectorate considers that the ES should identify whether there are any sensitive visual receptors which could be impacted beyond the 2km study area. In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope this matter from the assessment.
334	Paras 7.4.4 to 7.4.5, table 7-2	0.5 km Cable Route study area (operation and decommissioning phases)	Paragraph 7.4.5 states that all landscape and visual receptors within this study area would be scoped into the LVIA. However, table 7-2 of the Scoping Report states that the 0.5km cable route study area would be scoped out for landscape and visual assessment during operation and decommissioning. This should be clarified for the ES.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			The Inspectorate agrees that this study area can be scoped out of the assessment during the operational phase. The ES should clarify whether the decommissioning phase is scoped into the assessment. The Inspectorate assumes that the cables will be left in situ and therefore works during this phase will be minimal. However, if any works are anticipated during the decommissioning phase, the ES should provide an assessment of such effects or justify why an assessment is not required.
335	Table 7-2, para 7.7.23	5km study area - visual effects (all phases)	Paragraph 7.7.23 states that effects on visual receptors will be assessed to 2km. Table 7-2 states that visual effects to 5km will be scoped out. The Inspectorate considers that the ES should identify whether there are any sensitive receptor locations which could be impacted as a result of potential effects on long distance or elevated views and assess any significant visual effects where they are likely to occur within the 5km study area. In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope visual effects from the assessment within the 5km study area.
336	Table 7-2, para 7.7.23	5km study area – cumulative visual effects (all phases)	The Inspectorate notes that table 7-2 states that cumulative visual effects will be scoped out of the assessment but paragraph 7.7.23 states that a cumulative assessment will assess both the cumulative landscape and cumulative visual effects of the proposed development in conjunction with other consented renewable schemes and those known within the planning process within the 5km study area. The ES should clarify the study area for assessment of cumulative visual effects. In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope this matter from the assessment. Accordingly, the ES should include an assessment of cumulative visual effects within the 5km study area or provide information demonstrating agreement with the relevant consultation bodies and the absence of a likely significant effects.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
33.7	Table 7-3	Landscape Character Types (LCTs) and Landscape Character Areas (LCAs) as defined by East Riding of Yorkshire Landscape Character Assessment (2018) – LCA 2B and LCA 2C (all phases)	The Scoping Report proposes to scope out LCTs and LCAs over 3km from the proposed development site with limited intervisibility and perceived through the settlement of Pocklington. The Inspectorate agrees that this matter can be scoped out on this basis.
33.8	Table 7-3	LCTs and LCAs as defined by East Riding of Yorkshire Landscape Character Assessment (2018) – LCA 4A (all phases) LCA 9D and LCA 9E (all phases) LCA 10D (all phases) LCT 12: LCA 12A (all phases)	The Scoping Report proposes to scope out these LCAs due to their limited intervisibility with the proposed development. The Inspectorate agrees that this matter can be scoped out on this basis.
33.9	Para 7.5.160	Photomontages for the Cable Route Search Corridor (CRSC) (all phases)	Photomontages for the CRSC are proposed to be scoped out of the assessment on the basis that the majority of development will be below ground. Access points would be above ground, but effects are likely to be small, barely perceptible and localised. On this basis, the Inspectorate agrees that this matter can be scoped out from further assessment.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
33.10	Appendix 7-D	Selected visual receptors (all phases)	The Scoping Report has scoped out various visual receptors in appendix 7-D for assessment. The ES should explain why visual receptors were scoped out and demonstrate how these have been consulted on and should, where possible, be agreed on with the relevant consultation bodies such as local planning authorities.

ID	Ref	Description	Inspectorate's comments
33.11	Section 7.4, para 7.7.5	Study areas	The Inspectorate considers that the LVIA study areas should be based on the furthest extent of likely significant effects. The applicant's attention is drawn to comments from NE at appendix 2 of this Opinion which recommend that the LVIA study area is extended to at least 5km. The ES should provide further justification for study areas, with reference to the proposed Zones of Theoretical Visibility (ZTVs) and the furthest extent of likely significant effects. Efforts should be made to agree the study areas and ZTVs with relevant consultation bodies. The Inspectorate considers that the ES should identify whether there are any sensitive receptor locations which could be impacted as a result of potential effects on long distance or elevated views and assess any significant effects where they are likely to occur beyond the 5km study area.
33.12	Para 7.5.160	Representative viewpoints - photomontages	The applicant should justify the choice of representative viewpoints for the photomontages where it is considered that significant effects are likely to occur, ensuring that these are representative of the maximum visual envelope of the proposed development. The applicant is encouraged to seek agreement from relevant consultation bodies regarding the appropriateness of selected photomontages and evidence of this agreement should be provided with the DCO application. The photomontages should show all components of the proposed development, including, but not limited to, the pole

ID	Ref	Description	Inspectorate's comments
			mounted closed-circuit television (CCTV), security fencing, BESS, substations, and switch room(s), and demonstrate the proposed development before and after mitigation to enable a worst-case scenario to be fully understood.
3.3.13	Section 7.6	Mitigation and enhancement	The Scoping Report considers that the level and type of mitigation measures required will be subject to further environmental assessment and design evolution. For the avoidance of doubt, the ES should describe any relevant mitigation measures identified from the LVIA assessment and explain how delivery of these measures has been secured. Specific enhancement plans should also be clearly set out in the ES and secured through the DCO.
3.3.14	Para 7.7.23	Cumulative effects	The Scoping Report proposes a cumulative assessment of both cumulative landscape and cumulative visual effects in conjunction with other consented renewable schemes and those known within the planning process within the 5km study area. An appropriate study area for long distance views should inform which potential cumulative developments should be included for assessment. The Inspectorate considers that other developments apart from renewable developments should be included in the assessment to determine if likely significant effects could occur. The ES should justify the chosen study area and developments to be included in the assessment of cumulative effects and efforts should be made to agree the approach where possible with relevant consultation bodies.
3.3.15	Paras 7.7.16 to 7.7.17	Lighting	The ES should describe the light levels likely to be generated during construction, operation and decommissioning. The ES should provide an assessment of any likely significant effects resulting from lighting for all phases of the development, including a night-time assessment. Where mitigation is being relied on to avoid likely significant effects this should be described, including any embedded mitigation such as the design of the lighting or layout.
3.3.16	N/A	Planting mitigation	The Scoping Report proposes that additional planting including woodland and hedgerows is used as mitigation for landscape and visual effects. The applicant is advised to

ID	Ref	Description	Inspectorate's comments
			consider that such mitigation can itself have landscape and visual effects by reducing openness and views. The LVIA should consider the adverse and beneficial effects of the mitigation measures and justify why the chosen mitigation measures were included with respect to the specific landscape and visual character of the area.
33.17	N/A	Temporary and permanent effects	The Scoping Report refers to the landscape and visual impacts of the proposed development as largely temporary. The applicant's attention is drawn to box 2.1.3 of this Opinion; the ES should confirm which impacts are considered to be temporary or permanent and define the timescales used in the assessment.
33.18	N/A	Landscape and visual receptors	The Scoping Report does not describe whether users of waterways, such as Pocklington Canal, will be included in the LVIA. The Inspectorate considers that the ES should include such users as sensitive receptors or provide justification for their exclusion. Efforts should be made to agree the list of sensitive receptors included in the LVIA with relevant consultation bodies.

3.4 Biodiversity

(Scoping Report section 8)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
34.1	Table 8-7	Impacts to non-ornithological features of Humber Estuary Ramsar and qualifying features of Humber Estuary Special Area of Conservation (SAC), Lower Derwent Valley SAC and River Derwent SAC (Humberhead Sites and CRSC, all phases)	The Scoping Report proposes to scope out this impact on the basis that indirect effects arising from run-off during the construction phase will be mitigated by following standard pollution prevention measures to be outlined in the outline Construction Environmental Management Plan (oCEMP) and outline Landscape and Ecological Management Plan (oLEMP). The Inspectorate is not in agreement with this approach. The Scoping Report does not present sufficient information to conclude that the proposed development is not hydrologically connected to these sites. The ES should include an assessment of these matters or demonstrate the absence of likely significant effects with evidence of agreement from relevant consultation bodies. The applicant's attention is drawn to comments from Natural England (NE) and the EA at appendix 2 of this Opinion regarding the suggested scope of the assessment in the ES.
34.2	Table 8-7	Impacts to qualifying features of Thorne and Hatfield Moors SPA and Strensall Common SAC and non-ornithological features of Lower Derwent Valley Ramsar (Humberhead Sites and CRSC, all phases)	The Scoping Report proposes to scope out this impact on the basis of the distance between the proposed development and the protected sites and lack of impact pathway. The Inspectorate is in agreement with this approach for qualifying features of Thorne and Hatfield Moors SPA and Strensall Common SAC only. The Inspectorate does not agree to scope out impacts to non-ornithological features of Lower Derwent Valley Ramsar. The Scoping Report does not present sufficient information to conclude that the proposed development is not hydrologically connected to this site. The ES should include an assessment of these matters or demonstrate the absence of likely significant effects with evidence of agreement from relevant consultation bodies.
34.3	Table 8-7	Impacts to Skipwith Common SAC, White Carr Meadow Site of	The Scoping Report proposes to scope out this impact on the basis of the distance between the proposed development and the protected sites, lack of impact pathway, and that construction traffic movements will be insufficient to create a potential air pollution

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		Special Scientific Interest (SSSI), Skipwith Common SSSI and Allerthorpe Common SSSI (Humberhead Sites and CRSC, all phases)	pathway. The Inspectorate is in agreement with this approach for Allerthorpe Common SSSI, Skipwith Common SAC and Skipwith Common SSSI. The Scoping Report does not provide sufficient information to exclude the potential for significant effects on White Carr Meadow SSSI. The applicant's attention is drawn to comments from NE at appendix 2 of this Opinion regarding the potential for impacts on White Carr Meadow SSSI. The ES should include an assessment of effects to White Carr Meadow SSSI or demonstrate the absence of likely significant effects with evidence of agreement from relevant consultation bodies.
344	Table 8-7	Impacts to Pocklington Canal SSSI, South Cliffe Common SSSI, White Carr Local Wildlife Site (LWS), Bubwith – Holme-on-Spalding-Moor Disused Railway Line LWS, Nunburnholme Meadow LWS, South Cliffe Common LWS, Scorbrough Plantation - historic LWS (Humberhead Sites and CRSC, operation)	The Scoping Report proposes to scope out this impact during the operational phase on the basis that operational impacts are considered to be limited based on embedded mitigation measures and best practice. The Inspectorate considers that, as construction and decommissioning effects of disturbance are scoped in for these protected sites, and that the operational phase includes replacement of all solar panels, that this impact should be scoped in. The ES should include an assessment of these effects or demonstrate the absence of likely significant effects with evidence of agreement from relevant consultation bodies. The applicant's attention is drawn to comments from NE at appendix 2 of this Opinion regarding impacts to Pocklington Canal SSSI. The Scoping Report proposes to scope out impacts to White Carr LWS during all phases of the proposed development if this site can be avoided with site and route selection. The Inspectorate is in agreement with this approach.
345	Table 8-7, para 4.4.13	Impacts to all other LWS within 2km (all phases)	The Scoping Report proposes to scope out impacts to all other LWS apart from those identified in box 3.4.4 above on the basis of the distance between the proposed development and the designated sites and lack of impact pathway. The Inspectorate is content with this approach with the exception of the following sites:

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			• Seaton Old Wood LWS • Field House Wood LWS • Holmes Field Reserve (Allerthorpe Gravel Pits) LWS • Beck Wood LWS • Ponds Wood Londesborough LWS • Everingham Carrs LWS Paragraph 4.4.13 states that the 400kV substation may be located in any of the following Humberhead Sites: 1-1, 1-2, 2-1, 3-1, 3-2, 4-1, 4-3 and/ or 4-7. Figure 8-4 indicates that the above LWS may be in proximity to these areas which may have the 400kV sited within it. Therefore, the Inspectorate considers that there is the potential for significant effects to these LWS. The ES should include an assessment of effects to these sites or demonstrate the absence of likely significant effects with evidence of agreement from relevant consultation bodies.
34.6	Table 8-7	Impacts to arable land (Humberhead Sites and CRSC, all phases)	The Scoping Report proposes to scope out this impact on the basis that this habitat is of negligible importance and impacts to species supported by this habitat will be scoped in. The Inspectorate is in agreement with this approach.
34.7	Table 8-7	Impacts to grassland (CRSC, all phases)	The Scoping Report proposes to scope out this impact. No rationale for this decision is provided; however, the Inspectorate considers that any loss of this habitat will occur in the construction and decommissioning phases, which are scoped into the assessment, and therefore the Inspectorate agrees to scope this matter out.
34.8	Table 8-7	Impacts to waterbodies (Humberhead Sites and CRSC, operation)	The Scoping Report proposes to scope out this impact on the basis that mitigation including no loss of ponds where possible, a 10 metre (m) buffer, and other measures in the oLEMP and oCEMP will prevent impacts from potential damage. The Inspectorate is in

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			agreement with this approach. The Inspectorate advises that the oOEMP should also include suitable mitigation measures to prevent damage to these habitats.
34.9	Table 8-7	Impacts to ditches and watercourses (Humberhead Sites and CRSC, operation)	The Scoping Report proposes to scope out this impact on the basis that small-scale habitat loss would be limited to necessary crossing locations. Noting that this impact is scoped in for the construction and decommissioning phases, the Inspectorate is in agreement with this approach.
34.10	Table 8-7	Impacts to hedgerows and trees (Humberhead Sites and CRSC, operation)	The Scoping Report proposes to scope out this impact during operation. Noting that impacts from loss of this habitat are scoped in for the construction and decommissioning phases, the Inspectorate is in agreement with this approach.
34.11	Table 8-7	Impacts to broad-leaved woodland (Humberhead Sites and CRSC, all phases)	The Scoping Report proposes to scope out this impact on the basis that woodland habitat will be retained and a 10m buffer from woodland habitat is proposed. The Inspectorate is in agreement with this approach. The applicant's attention is drawn to comments from the Forestry Commission at appendix 2 of this Opinion regarding appropriate buffer distances for trees and ancient woodland.
34.12	Table 8-7	Degradation of retained habitats (Humberhead Sites and CRSC, all phases)	The Scoping Report proposes to scope out this impact on the basis that potential for damage to retained habitats will be avoided by following the embedded mitigation measures set out in the oCEMP and oLEMP. The Inspectorate is in agreement with this approach, noting that the ES should still identify impacts and where in the management plans these are addressed.
34.13	Table 8-7	Invasive non-native flora (Humberhead Sites and CRSC, all phases)	The Scoping Report proposes to scope out this impact on the basis that impacts will be managed via embedded mitigation measures in the form of an invasive species management plan (ISMP). The Scoping Report does not provide any detail explaining what will be provided in the ISMP or provide examples of relevant mitigation measures. Therefore, the Inspectorate is not in a position to scope this matter out of the assessment. The ES should include an assessment of these effects or demonstrate the absence of

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			likely significant effects with evidence of agreement from relevant consultation bodies. The applicant's attention is drawn to comments from the EA at appendix 2 of this Opinion regarding invasive non-native species and biosecurity measures.
34.14	Table 8-7	Impacts to amphibians (Humberhead Sites and CRSC, all phases)	The Scoping Report proposes to scope out this impact on the basis that no significant impacts are anticipated during operation as maintenance and replacement activities can be managed through appropriate embedded avoidance measures as part of the oOEMP. The Scoping Report also states that habitats within solar areas will be improved for amphibians. The Inspectorate considers that, as the solar areas may be more suitable for amphibians than the baseline habitat, there is the potential for greater numbers of amphibians at the point of replacing solar panels than there were at the baseline. Accordingly, any impact to amphibians as a result of maintenance and replacement activities has the potential to affect a greater number of amphibians. Therefore, the Inspectorate is not in a position to scope this matter out of the assessment. The ES should include an assessment of these effects or demonstrate the absence of likely significant effects with evidence of agreement from relevant consultation bodies.
34.15	Table 8-7	Impacts to reptiles (Humberhead Sites and CRSC, all phases)	The Scoping Report proposes to scope out this impact on the basis that suitable reptile habitats within the scoping boundary will be largely retained and protected with 6m buffers around field boundary habitats. The Scoping Report proposes that small-scale impacts will be managed by embedded avoidance measures implemented by Ecological Clerk of Works (ECoW). The Inspectorate is in agreement with this approach. The Inspectorate advises that a suitable buffer around field boundary habitats should also be in place during the operational and decommissioning phases.
34.16	Table 8-7	Impacts to badger (Humberhead Sites and CRSC, operation)	The Scoping Report proposes to scope out this impact on the basis that mammal gates or natural gaps in boundary fences will minimise impacts during operation. The Inspectorate is in agreement with this approach.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
34.17	Table 8-7	Impacts to bats (CRSC, operation)	The Scoping Report proposes to scope out impacts to bats in the CRSC during the operational phase. No rationale is provided for this decision, however, the Inspectorate considers that impacts to this species in the CRSC during operation are unlikely to give rise to a significant effect and agrees to scope this matter out of the assessment.
34.18	Table 8-7, figure 8-2	Impacts to otter and water vole (Humberhead Sites and CRSC, operation)	The Scoping Report proposes to scope out this impact on the basis that operational impacts are considered to be limited and access to watercourses for this species will be maintained. The Inspectorate does not agree to scope this matter out of the assessment. The Scoping Report states that signs of otter and records of water voles have been identified adjacent to the Humberhead Sites and figure 8-2 shows that the solar areas are adjacent to or include watercourses. The provision of mammal gates and gaps infers that otters will not be excluded from the site during maintenance and replacement activities. Therefore, the ES should include an assessment of these effects or demonstrate the absence of likely significant effects with evidence of agreement from relevant consultation bodies. The applicant's attention is drawn to comments from East Riding of Yorkshire Council (ERYC) at appendix 2 of this Opinion regarding the study area for water voles; the study area should be based on relevant guidance specific to this species.
34.19	Table 8-7	Impacts to brown hare and hedgehog (Humberhead Sites and CRSC, all phases)	The Scoping Report proposes to scope out this impact on the basis that construction impacts will be managed through embedded mitigation, such as ECoW, and appropriate avoidance measures, and mammal gates will be provided. The Inspectorate is in agreement with this approach.
34.20	Table 8-7	Impacts to invertebrates (Humberhead Sites and CRSC, all phases)	The Scoping Report proposes to scope out this impact on the basis that loss/ fragmentation of habitat is unlikely to be of sufficient magnitude to affect populations locally based on the dominance of monoculture agricultural habitats present, and that there will be an 8m buffer from field boundaries. The Inspectorate is in agreement with this approach.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3421	Para 8.5.30, tables 8-7, 9-3	Impacts to aquatic fauna (Humberhead Sites, all phases)	The Scoping Report proposes to scope out this impact on the basis that operational impacts are considered to be limited based on embedded mitigation measures and best practice. Figures provided in the Scoping Report and paragraph 8.5.30 indicate that main rivers either border or run through the Humberhead Sites. In addition, the Scoping Report states that no surveys or other information has been obtained to ascertain the presence of aquatic fauna within the Scoping Boundary. The Inspectorate also notes that impacts to Pocklington Canal SSSI are scoped into the assessment, and that Pocklington Canal SSSI supports aquatic fauna. The Water Environment chapter of the Scoping Report (table 9-3) states that one of the waterbodies on the border of the Humberhead Sites reported 12 species of fish in an environmental DNA survey. Therefore, the Inspectorate does not agree to scope this matter out. The ES should include an assessment of these effects or demonstrate the absence of likely significant effects with evidence of agreement from relevant consultation bodies. The applicant's attention is drawn to comments from the EA at appendix 2 of this Opinion regarding impacts to aquatic fauna and the scope of the assessment in the ES.
3422	Table 8-8, para 8.6.57	Impacts to ornithological features of Humber Estuary SPA and Ramsar, Lower Derwent Valley SPA and Ramsar and Melbourne and Thornton Ings SSSI. Impacts to ground nesting birds, Schedule 1 birds, non-breeding birds	The Scoping Report proposes to scope out these impacts in the CRSC during the operational phase on the basis that the cables will remain underground and in situ for the operational period, any maintenance activities would be infrequent, localised and temporary, and these impacts are unlikely to give rise to significant effect. The Inspectorate is in agreement with this approach.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		Impact to all other ornithological features not identified in table 8-8 (CRSC, operation)	
3423	Table 8-8, paras 8.6.45 to 8.6.47	Impacts to ornithological features of Thorne and Hatfield Moors SPA and Allerthorpe Common SSSI (Humberhead Sites and CRSC, all phases)	The Scoping Report proposes to scope out this impact on the basis that potential impacts to the qualifying features of this designation are considered unlikely due to distance (16km) and lack of potential impact pathways with the potential to affect designated features during any phase of the proposed development. The Inspectorate is in agreement with this approach for Thorne and Hatfield Moors SPA only. Figure 8-4 indicates that Allerthorpe Common SSSI is much closer to the scoping boundary than 16km. The Scoping Report does not present any evidence to indicate that the ornithological features of Allerthorpe Common SSSI are not supported by the habitat within the scoping boundary. Therefore, the Inspectorate is not in a position to scope this matter out of the assessment. The ES should include an assessment of these effects or demonstrate the absence of likely significant effects with evidence of agreement from relevant consultation bodies.
3424	Paras 8.6.48 to 8.6.52	Impacts to non-ground nesting birds which are not Schedule 1 species or designated features (all phases)	The Scoping Report proposes to scope out this impact on the basis that construction and operational impacts are likely to be limited to species associated with agricultural land, including ground-nesting birds, breeding waders and wildfowl. The Scoping Report proposes that embedded mitigation measures including distances from boundary features and ECoW during construction, operation (replacement activities only) and decommissioning will ensure the safeguarding of retained habitats and avoidance of disturbance. The Inspectorate is in agreement with this approach.
3425	Paras 8.6.53	Impacts to ornithological features via water	The Scoping Report proposes to scope out this impact on the basis that any construction effects would be temporary, localised and managed using good practice measures to be detailed in the oCEMP. Mitigation measures proposed include pollution prevention controls

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
	to 8.6.56	quality impact pathway (all phases)	and a 10m buffer from watercourses. The Inspectorate is not in agreement with this approach. The Scoping Report does not provide sufficient evidence that any pollution or sediment runoff from the proposed development would be subject to adequate attenuation to disregard significant effects via the water quality impact pathway. The applicant's attention is drawn to comments from NE at appendix 2 of this Opinion in this regard. The ES should include an assessment of these effects or demonstrate the absence of likely significant effects with evidence of agreement from relevant consultation bodies.
3426	Table 8-12	Summary scoping table	Table 8-12 shows a summary of the elements or features scoped in and out of the assessment of ecology and ornithology. The Inspectorate identifies a number of differences between what is scoped in or out in table 8-12 and what is scoped in or out of tables 8-7 or 8-8. For the avoidance of doubt, the Inspectorate has disregarded table 8-12.

ID	Ref	Description	Inspectorate's comments
3427	N/A	Thorne Moor SAC, Hatfield Moor SAC and Thorne and Hatfield Moors SPA	The Scoping Report incorrectly refers to 'Thorne and Hatfield Moors SAC'. The applicant is advised to be specific when referring to the following different designated sites: Thorne Moor SAC, Hatfield Moor SAC, and Thorne and Hatfield Moors SPA.
3428	Table 8-1	National Nature Reserves (NNR)	Table 8-1 identifies that Lower Derwent Valley NNR and Skipwith Common NNR are present within 20km of the scoping boundary. The Scoping Report does not discuss these sites further or state whether impacts to these sites are scoped in or out of the assessment. The ES should include an assessment of effects to this site, demonstrate the absence of likely significant effects with evidence of agreement from relevant consultation bodies, or explain why an assessment was not required.
3429	N/A	South Cliffe Common SSSI	The Scoping Report does not discuss impacts to ornithological features supported by South Cliffe Common SSSI in table 8-8. The ES should include an assessment of these effects or demonstrate the absence of likely significant effects with evidence of agreement from relevant consultation bodies.

ID	Ref	Description	Inspectorate's comments
34.30	N/A	Allerthorpe Common SSSI	The Scoping Report does not discuss impacts to non-ornithological features supported by Allerthorpe Common SSSI in table 8-7. The ES should include an assessment of these effects or demonstrate the absence of likely significant effects with evidence of agreement from relevant consultation bodies, or explain why an assessment was not required.
34.31	Para 8.7.4	Sensitive environmental information	Under Regulation 12(5)(g) of the Environmental Information Regulations 2004 (EIR), public bodies have a responsibility to avoid releasing sensitive environmental information that could bring about harm to sensitive or vulnerable ecological features. Sections of the ES containing specific survey and assessment data relating to the location of sensitive species (for example, badgers, rare birds, and plants) or other vulnerable environmental features should be provided in separate annexes by the applicant. This approach reduces the sensitive ecological feature's risk of disturbance, damage, persecution, or commercial exploitation arising from publication. The applicant's approach should be proportionate and only use these separate annexes for species where there is a genuine risk of harm. The Inspectorate notes in paragraph 8.7.4 that the applicant intends to include such information in a confidential appendix to the ES Chapters. All other assessment information should be included in an ES chapter, as normal, with a placeholder providing a justification as to why annexes have been withheld and that a full version of the ES has been submitted to the Inspectorate.
34.32	Paras 8.4.4, 8.5.4	Study area and proposed surveys for breeding birds	The Scoping Report states that the study area for the breeding bird surveys and breeding bird habitat suitability assessment will be between a 100m and 200 m radius from the proposed development site boundary. The ES should identify which study area was chosen in the assessment and explain the criteria for choosing a 100m or 200m (or other) radius for the study area for these surveys in line with relevant guidance. The Scoping Report proposes a number of bird surveys which will be carried out once for each study area. The Inspectorate advises that the impact assessment should be supported by an appropriate baseline covering both wintering and breeding bird seasons.

ID	Ref	Description	Inspectorate's comments
			The applicant should seek to agree survey methods and the study area with NE who have provided comments at appendix 2 of this Opinion.
34.33	Para 8.6.2, table 8-7	Buffer distances	The Scoping Report proposes embedded mitigation including minimum buffers around specific environmental and ecological features. The buffer distances should be based on appropriate guidance and the ES and/ or relevant management plans should identify the buffer distance(s) in each instance. Table 8-7 refers to both a 6m and an 8m boundary from field boundaries. The ES and relevant management plans should identify the correct buffer distance, referencing appropriate guidance to support the distance selected. Where watercourses are concerned, the buffer distance should confirm whether the buffer describes a distance from the bank top or water's edge. The Inspectorate notes that buffer distances from watercourses are included in the Commitments Register with relevance to the Water Environment chapter. The ES and relevant management plans should ensure that buffer distances are consistent across documents and apply for all relevant phases of the proposed development.
34.34	Paras 4.4.22, 8.6.2	Deer	Paragraph 8.6.2 of the Scoping Report states that commuting routes through the site for deer will be maintained. Paragraph 4.4.22 states that perimeter fencing of the solar arrays will be comprised of deer wire mesh. The ES should explain whether deer commuting routes will be incorporated into the proposed development and identify these routes. The applicant is encouraged to consider the risk of deer entrapment within the site as a part of their assessment.
34.35	Para 8.6.10	District Level Licensing approach to Great Crested Newts (GCN)	The applicant proposes that the effects of the proposed development on GCN may be offset by obtaining a licence through the NE District Level Licensing (DLL) scheme. The Inspectorate understands that the DLL approach includes strategic area assessment and the identification of risk zones and strategic opportunity area maps. The ES should include information to demonstrate whether the proposed development is located within a risk zone for GCN. If the applicant enters into the DLL scheme, NE will undertake an impact assessment and inform the applicant whether their scheme is within one of the amber risk

ID	Ref	Description	Inspectorate's comments
			zones and therefore whether the proposed development is likely to have a significant effect on GCN. The outcome of this assessment will be documented on an Impact Assessment and Conservation Payment Certificate (IACPC). The IACPC can be used to provide additional detail to inform the findings in the ES, including information on the proposed development's impact on GCN and the appropriate compensation required.
34.36	Para 8.6.34	Habitats after decommissioning	The Scoping Report states that there is the potential for certain areas within the Humberhead Sites to be retained as a beneficial legacy, where they provide demonstrable biodiversity and ornithological value and do not conflict with the resumption of agricultural use. The Inspectorate welcomes this suggestion but advises that the assessments in the ES should be based on the commitments proposed in the dDCO.
34.37	Paras 3.3.9 to 3.3.17	Wind turbines	The Scoping Report identifies that wind turbines are located within and near to the red line boundary of the proposed development. The applicant is advised to consider the effects of providing habitat intended to attract birds and bats within the vicinity of wind turbines. The ES should provide justification for the siting of areas intended for such habitat.

3.5 Water Environment

(Scoping Report section 9)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
35.1	Para 9.5.37, table 9-9	Effects on the receptor Allerthorpe SSSI (all phases)	The Scoping Report proposes to scope out an assessment of effects on this receptor on the basis that the scoping boundary is over 2km away and that Allerthorpe SSSI is upstream from the scheme. The Inspectorate is in agreement with this approach.
35.2	Para 9.6.14, table 9-9	Impacts on foul drainage (all phases)	The Scoping Report proposes to scope out this matter on the basis that any foul wastewater generated on-site would be stored in a self-contained foul drainage system to a sealed cesspit or similar sealed system and emptied by a registered waste management contractor. However, paragraph A4.19 of appendix 9-1 states that connecting to the nearest available public sewer will be considered as a foul drainage option. The Scoping Report states that there is the potential for foul wastewater spillage. In the absence of a confirmed foul wastewater management approach, the Inspectorate is not in a position to scope this matter out of the assessment. The ES should confirm how foul wastewater will be managed and justify the chosen approach. The ES should describe foul wastewater management for all phases of the proposed development.
35.3	Para 9.6.15, table 9-9	Impact on water demand/ water supply (all phases)	The Scoping Report proposes to scope out impacts on water demand on the basis that any water required would be supplied by a commercial source and no on-site abstraction is proposed. It is unclear from the Scoping Report how much water the proposed development will require during each phase of the development, or if any water is required for the cleaning of solar panels or to mitigate fire risk. In the absence of this information, the Inspectorate does not agree to scope this matter out of the assessment. The ES should include an assessment of effects to this site or demonstrate the absence of likely significant effects with evidence of agreement from relevant consultation bodies. The ES should confirm the expected water demand and the source or supplier.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
354	Table 9-9	Nutrient neutrality (all phases)	The Scoping Report proposes to scope out effects on nutrient neutrality on the basis that the study area contains no nutrient neutrality areas. The Inspectorate is in agreement with this approach.
355	Tables 9-4, 9-9	Flood risk from all sources (construction, decommissioning)	The Scoping Report proposes to scope out this matter on the basis that flood risk measures during the construction and decommissioning phases will be managed by contractor via the oCEMP and oDEMP. The Inspectorate is not in agreement with this approach. The Scoping Report states (paragraph 9.6.5) that mitigation measures will be described in the oCEMP and will be based on good practice measures such as the Construction Industry Research and Information Association (CIRIA) guidance; the mitigation is not sufficiently described in the Scoping Report to consider whether significant effects are likely or not. The Inspectorate also notes that the number and location of temporary construction compounds are not determined at this stage. In the absence of the above information and considering that large areas of the site are in Flood Zones 2 and 3, the Inspectorate is not in a position to scope this matter out. The ES and Flood Risk Assessment (FRA) should include an assessment of these effects or demonstrate the absence of likely significant effects with evidence of agreement from relevant consultation bodies. The applicant's attention is drawn to comments from the EA at appendix 2 of this Opinion regarding the scope and methodology of the FRA.
356	Table 9-9	Thermal impact to groundwater (operation)	The Scoping Report proposes to scope out this matter on the basis that heat generated by underground grid connection cables is unlikely to be significant due to underground grid connection cables being relatively shallow across land and the localised nature of any temperature change. However, shallow groundwater is identified from paragraphs 9.5.51 onwards. Therefore, the Inspectorate disagrees that this impact can be scoped out. The ES should include an assessment of these matters or demonstrate the absence of likely significant effects with evidence of agreement from relevant consultation bodies. The applicant's attention is drawn to comments from the EA at appendix 2 of this Opinion regarding the potential for heat effects on groundwater.

ID	Ref	Description	Inspectorate's comments
35.7	Paras 9.4.1 to 9.4.4	Study area	The Scoping Report states that the study area is an area of 1km around the site and that this is based on professional judgement. For flood risk and groundwater effects, the Scoping Report states that the study area is extended up to approximately 2km from the scoping boundary. It is stated that the dilution and dispersion of pollutants will be sufficient to consider the Humber Estuary (7.5km from the scoping boundary) not to be at risk of significant effects. The ES should make it clear how the study area(s) have been selected and how the hydrological connectivity of relevant water features has been assessed. If dilution is proposed to address potential impacts, this should be clearly explained. The ES should assess the potential for adverse effects on water quality unless it can demonstrate that there would be no pathways of effect for water quality.
35.8	Table 9-9	Surface water management	Table 9-9 indicates that the outline Drainage Strategy will manage surface water runoff during the operational phase and that an assessment of these effects is scoped in. It is not clear whether surface water runoff is scoped in for assessment for the construction and decommissioning phases, or whether this will be described in the outline Drainage Strategy. The Inspectorate considers that surface water runoff will need to be managed during all phases of the proposed development. The ES should include these phases in the assessment. The applicant's attention is drawn to comments from the EA at appendix 2 of this Opinion regarding the scope and level of detail to be included in the FRA, outline Surface Water Drainage Strategy, ES, outline Battery Safety Management Plan (oBSMP) and other relevant management plans.
35.9	N/A	Protected sites	The Inspectorate is unclear why Melbourne and Thornton Ings SSSI and Lower Derwent Valley SAC, SPA and Ramsar are not discussed with respect to scoping. Paragraph 9.4.2 states that the study area will extend as far downstream as a potential impact may influence the quality or quantity of the water body. Figure 9-1 shows that these protected sites are located just outside of the 1km study area. Accordingly, the ES and FRA should

ID	Ref	Description	Inspectorate's comments
			include an assessment of effects to these sites or demonstrate the absence of likely significant effects with evidence of agreement from relevant consultation bodies.
35.10	N/A	Proposed development phases	The ES should describe impacts to the water environment with regard to which phase(s) of the proposed development that they occur in and are relevant to.
35.11	Paras 9.6.6 to 9.6.8	Water crossings	Paragraphs 9.6.6 to 9.6.8 indicate that watercourse crossings will be required to facilitate vehicle access and to construct the cable route. Paragraph 9.6.7 states that trenchless cable crossing techniques will be used where possible, but other techniques may be used if necessary. The ES should explain which crossing technique(s) will be prioritised, and which techniques will be used if the preferred option is not viable. The differing direct and indirect effects of each technique should be described and the ES should justify why each technique is necessary and selected. The Scoping Report states that Horizontal Directional Drilling (HDD) may be used for cable crossings. Where HDD is proposed for watercourse crossings, the ES should include an assessment of the potential effects from release of drilling fluids during crossings and also consider potential effects on existing flood defences from noise and vibration. Cross-references to the ground conditions and noise and vibration chapters should be considered where appropriate. The applicant's attention is drawn to comments from the EA, NE and the Canal and River Trust (CRT) at appendix 2 of this Opinion regarding how HDD should be undertaken. The proposed depth below the watercourse bed should be stated and justified based on relevant guidance.
35.12	Para 9.6.15	Water demand	It is unclear from the Scoping Report if the proposed development will require water and, if so, the volume of water required. The ES should confirm the expected water demand and the source or supplier.

ID	Ref	Description	Inspectorate's comments
35.13	Para 9.6.19	Waste and debris management	The Scoping Report states that waste and debris will be prevented from entering any surface water drainage or water feature. The ES and/ or any relevant management plans included with the application should describe how this would be prevented.
35.14	Paras 9.6.20, 9.7.24	Flood compensation measures	The Scoping Report states that there may be potential for the displacement of floodwater, and that this may require the construction of flood compensation or mitigation measures to ensure that there is no increase in flooding. The ES and FRA should confirm whether such measures are required, describe the measures, and any effects relating these measures should be included in the assessment of environmental effects. The ES should confirm whether any mitigation areas for flooding are included within the redline boundary of the proposed development.
35.15	Para 9.6.24	Location of sensitive electrical infrastructure	The Scoping Report states that sensitive electrical infrastructure such as the BESS and substations will be located outside of Flood Zones 2 and 3, where feasible. The applicant should site such infrastructure to avoid areas of the highest flood risk. Should this infrastructure be located in Flood Zones 2 or 3, the ES should provide justification for why these structures are sited in higher flood risk areas. The ES and FRA should confirm that at least 600mm of freeboard is included for such infrastructure within flood risk areas.
35.16	Para 9.7.32	Local and regional receptors	The Scoping Report states that “at a spatial level, ‘local’ effects are those affecting the site and neighbouring receptors, while effects upon receptors beyond the vicinity of the site are at a ‘regional’ level”. The ES and FRA should define what constitutes a neighbouring receptor and what is comprised of “beyond the vicinity of the site”.

3.6 Cultural Heritage

(Scoping Report section 10)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
36.1	Table 10-3	Non-designated and previously unrecorded buried archaeological remains within 1km study area (operational phase)	The Scoping Report states that there is not expected to be any potential impacts to buried archaeological remains during the operational phase of the proposed development as any impacts will have occurred and been mitigated during the construction phase. On this basis the Inspectorate agrees that this matter can be scoped out of the assessment.
36.2	Table 10-3	Decommissioning phase: Designated heritage assets within 3 km study area; and Non-designated built heritage assets within 1 km study area; and Non-designated and previously unrecorded buried archaeological remains within 1 km study area	The Scoping Report states that potential impacts to designated and non-designated built heritage assets as a result of changes to their setting during the decommissioning phase are not anticipated to be any greater than those assessed at construction and operation. It also states that potential physical impacts to buried archaeological remains during the decommissioning phase are not expected as any impacts would have occurred and been mitigated during the construction phase. The Inspectorate agrees to scope out impacts to buried archaeological remains during the decommissioning phase. The applicant's attention is drawn to guidance from the Chartered Institute for Archaeologists regarding potential impacts during the decommissioning phase. The applicant's attention is drawn to box 2.1.2 of this Opinion regarding the approach to decommissioning phase effects. The Inspectorate agrees to scope out decommissioning phase effects on designated and non-designated heritage assets on the basis that the construction phase assessment will identify suitable mitigation and the oDEMP will describe how impacts will be managed in order to prevent significant effects.
36.3	Table 10-3	Historic landscape (decommissioning phase)	The Scoping Report states that potential impacts on the character of the historic landscape are expected to be no worse than those assessed at construction and operation with the land returned to its former use. The Inspectorate agrees to scope this matter out.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments

ID	Ref	Description	Inspectorate's comments
364	Para 10.3.3, section 10.4	Study areas	The ES should contain a robust justification to support the study areas and sensitive receptors selected for the purposes of the cultural heritage assessment, with reference to relevant approaches such as the ZTV developed for the LVIA. It should be clear how the approach taken has ensured that any heritage assets with views towards or out from the application site have been identified and considered. The final approach and sensitive receptors for the assessment should be agreed where possible with relevant consultation bodies.
365	Para 10.6.6	Mitigation	Mitigation measures such as alternative techniques for solar infrastructure with ballast or above-ground mounting systems to avoid adverse effects on buried archaeology, should be clearly set out in the ES and secured through the DCO.
366	Paras 10.7.4 to 10.7.6	Methodology	The Scoping Report states that the level and degree of impact will be assigned with reference to a four-point scale as set out in table 10-2, and the assessment of the level and degree of impact will be made in consideration of any embedded mitigation measures for the proposed development. The ES should set out clearly how the assessment of effects has been made and how any significant effects have been determined.
367	Paras 10.7.17 to 10.7.18	Surveys	The Inspectorate advises that any intrusive investigations and trial trenching considered necessary should be completed prior to submission of the DCO application to inform the assessment in the ES. In the event that this is not possible, the applicant should provide justification explaining why. The applicant should seek to agree the scope and timing of any intrusive investigation with relevant consultation bodies where possible; evidence of this should be provided in the ES.

ID	Ref	Description	Inspectorate's comments
368	Para 10.7.19	Cumulative effects	The Scoping Report states that the cumulative effects assessment for cultural heritage assets would consider the combined residual effect of the proposed development and another project or projects on a single receptor within the study area. The Inspectorate considers that the approach to the cumulative effects assessment of cultural heritage assets should consider all phases of the proposed development and should be consulted on and agreed where possible with relevant consultation bodies.
369	Para 10.7.3	Heritage assets - setting	The Inspectorate considers that the influence on the setting of cultural heritage assets may extend beyond their strict designation boundary and that the wider landscape context should be considered in the assessment in conjunction with assessments in the Landscape and Visual chapter of the ES. The ES assessment of impacts to setting should consider other relevant factors such as dust, traffic, lighting, glint and glare and changes to land use, cross-referencing to other aspect chapters as appropriate.
36.10	Para 12.1.2	Noise and vibration effects on heritage receptors	Paragraph 12.1.2 of the Scoping Report states that the proposed scope for assessing noise and vibration on heritage receptors is covered in chapter 10 of the Scoping Report but this chapter does not clearly set out how noise and vibration effects will be assessed for cultural heritage assets and whether any matters relating to this are proposed to be scoped out. For the avoidance of doubt, the Cultural Heritage ES chapter should assess any impacts from noise and vibration which are likely to result in significant effects on heritage assets and/ or their setting.

3.7 Transport and Access

(Scoping Report section 11)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
37.1	Paras 11.6.11, 11.9.4, 11.9.5, table 11-6	Transport and access effects (operation)	The Scoping Report proposes to scope out all transport and access effects during the operational phase on the basis that the effects of maintenance will be minimal and unlikely to be significant, and that the effects of solar panel and battery replacement are anticipated to be less than those experienced during construction. The Inspectorate agrees that this matter can be scoped out, provided that the frequency and type of trips and vehicles during the operational phase would not trigger thresholds for likely significant effects within guidance from the Institute of Sustainability of Environmental Professionals (ISEP). The applicant should also refer to the total change threshold to support the assertion that changes would not be significant. The Scoping Report states that that all solar panels are expected to be replaced once and batteries four times over the operational lifespan. The Inspectorate considers that insufficient information has been provided regarding the trip generation associated with the replacement of solar panels and batteries, including the frequency and types of trips, and the potential for effects on grow. The Scoping Report states that the activity is likely to require the use of heavy goods vehicles (HGVs) and that the frequency of panel/ battery replacement has been based on the operational lifespans of those parts. It is not clear whether large numbers of parts may therefore require replacement at the same or similar times due to the concurrence of the operational lifespans of these parts and, if so, whether this has the potential to lead to likely significant effects. In addition, it is not clear whether abnormal indivisible loads (AILs) will be required to undertake panel or battery replacement. In the absence of such information, or evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope this matter out of the assessment. The ES should include an assessment of this matter or the information referred to demonstrating agreement with the relevant consultation bodies

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			and the absence of a likely significant effect. The ES and relevant management plans should confirm the number and type of vehicles during the operational phase with reference to thresholds within relevant guidance. The Inspectorate notes that vehicle movements during the operational phase are proposed to be managed using a Construction Traffic Management Plan (CTMP). The ES should confirm whether the CTMP is intended to manage traffic throughout all phases of the proposed development or whether separate management plans are proposed for the operational and decommissioning phases.
372	Paras 11.6.13, 11.9.6, table 11-6	Transport and access effects (decommissioning)	The Scoping Report proposes to scope out a separate assessment of transport and access during the decommissioning phase on the basis that decommissioning effects are anticipated to be similar to construction but of a lesser extent, and that the construction phase assessment would present the worst-case and capture all effects associated with the decommissioning phase. The Inspectorate is content with this approach, provided that the ES includes information on estimated trip generation arising during decommissioning and details on the mitigation measures proposed to avoid any likely significant effects.
373	Paras 11.9.7, 11.9.8, 11.7.16, 11.7.18, table 11-6	Transport and access effects of hazardous and large loads (all phases)	The Scoping Report proposes to scope out an assessment of the effects of hazardous and large loads on the basis that significant effects associated with hazardous loads and large loads are not anticipated. On the basis that paragraph 11.7.16 states that no hazardous loads are anticipated, the Inspectorate agrees to scope out an assessment of the effects of hazardous loads. No information has been provided in the Scoping Report on anticipated vehicle movements of potential AILs or and the type and nature of potential large loads, and consequently the Inspectorate does not agree that this matter can be scoped out of further assessment. The Inspectorate notes that an AIL assessment will be submitted with the DCO application (paragraph 11.7.18). The ES should describe the anticipated number and composition of any large loads and describe any safety measures as necessary. Any mitigation measures to avoid or reduce

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			likely significant effects should be set out in the ES with evidence of how such measures would be secured through the DCO. Efforts should be made to seek agreement with relevant consultation bodies on the assessment and any proposed mitigation.

ID	Ref	Description	Inspectorate's comments
374	Tables 11-1, 11-2, figures 11-2-1, 11-2-2, 11-2-3	PRoW	The Inspectorate identifies a number of inconsistencies between PRoW on figures 11-2-1, 11-2-2 and 11-2-3 and PRoW listed in table 11-1 and table 11-2, including: • Table 11-1 lists 'EY Holme on Spalding Moor Bridleway No.28' as interacting with Humberhead Site 3 and this PRoW is not shown on figure 11-2-2 • Figure 11-2-2 shows 'Holme on Spalding Moor Footpath No.12' and 'Holme on Spalding Moor Bridleway No.24' as interacting with Humberhead Site 4 and these PRoW are not listed in table 11-1 • Table 11-2 lists 'EY Holme on Spalding Moor Footpath No.5' as interacting with Humberhead Site 3 and this PRoW is not shown on figure 11-2-2 • Figure 11-2-2 shows 'Seaton Ross Footpath No.8' and 'Seaton Ross Footpath No.10' as interacting with the CRSC and these PRoW are not listed in table 11-1 • Table 11-2 lists 'EY Holme on Spalding Moor Bridleway No.14' as interacting with Humberhead Site 4 but this PRoW is not shown on figure 11-2-2 or 11-2-3 • Figure 11-2-3 shows 'Holme on Spalding Moor Bridleway No.13', 'Hotham Bridleway No.6', 'Hotham Bridleway No.3' and 'Holme on Spalding Moor Bridleway No.17' as interacting with the CRSC and these PRoW are not listed in table 11-2 For the avoidance of doubt, the ES should include all missing PRoW in the assessment of effects.

ID	Ref	Description	Inspectorate's comments
375	Para 11.5.51	National Cycle Network (NCN) routes	The Scoping Report states that NCN Route 66 is within the vicinity of the scheme. The extent of this route's interaction with the proposed development is not clear in the Scoping Report. The ES should include all relevant NCN routes within the assessment of effects and explain how the included NCN routes were selected. NCN routes should be shown on a plan.
376	Para 11.6.6	Construction vehicle routeing	The Scoping Report proposes that all construction traffic will avoid the AM and PM peak hours. The ES and relevant management plans should set out specifically which hours will be avoided and how this will be enforced. The ES and relevant management plans should also describe if there are any circumstances in which construction traffic movements will take place during peak hours, and how these movements will be managed. Efforts should be made to agree construction vehicle routeing with relevant consultation bodies.
377	Para 11.7.25	Sensitive ecological receptors	The Scoping Report does not include ecological receptors (with the exception of 'sites of ecological/ nature conservation value') in the list of sensitive receptors for the traffic and access assessment. It is unclear whether or not effects associated with transport are to be included in the assessment in the Biodiversity chapter of the ES. The ES should include such an assessment where appropriate and include cross-references to the Transport and Access chapter where needed to avoid duplication.

3.8 Noise and Vibration

(Scoping Report section 12)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
381	Para 12.6.4, table 12-5	Traffic vibration effects (construction, decommissioning)	The Scoping Report proposes to scope out this impact on the basis that significant vibration effects would only be generated by traffic movements on a road with an irregular surface, and that the local authority maintain good quality conditions. The Inspectorate is in agreement with this approach.
382	Para 12.6.8, table 12-5	Operational traffic noise effects (operation)	The Scoping Report proposes to scope out this impact on the basis that as no on-site staff will be required, operation traffic flows will be minimal and would not have a material effect on baseline road traffic noise levels. The Inspectorate is in agreement with this approach for maintenance activities only. It is noted that replacement of solar panels and battery elements would also be required. The Inspectorate considers that insufficient information has been provided regarding the number and types of trips generated by the replacement of operational elements, and the levels of traffic noise likely to be generated, and the impact thereof upon sensitive receptors, are unclear. In the absence of further information relating to these matters, the Inspectorate cannot agree to scope this matter out. The ES should include an assessment of these effects or demonstrate the absence of likely significant effects with evidence of agreement from relevant consultation bodies.
383	Paras 12.6.10 to 12.6.12, table 12-5	Vibration effects (operation)	The Scoping Report proposes to scope out this impact on the basis that there will be no perceptible vibration beyond the site boundary. The Inspectorate is in agreement with this approach.

ID	Ref	Description	Inspectorate's comments
384	Paras 12.4.4 to 12.4.6	Study area	The Scoping Report proposes a noise study area of 300m from the scoping boundary on the basis of “guidance in BS 5228-1 which states construction noise predictions are generally reliable up to 300m”. The Inspectorate notes that this guidance advises that the distance from which noise can be perceived should be calculated based on the activity and/ or plant being used, among other factors; the Scoping Report does not present any calculations. Similarly, the vibration study area is proposed to be 100m from the scoping boundary on the basis of guidance in the Design Manual for Roads and Bridges (DMRB) LA 111. This guidance advises that the study areas suggested are typical but can be defined for individual projects. The Scoping Report proposes that the study area for the BESS and the on-site substations is set at 1km from the scoping boundary, based on the quoted guidance in paragraph 12.4.6. This study area is not reflected in figure 12-1, which shows a 500m study area. The Inspectorate considers that the exclusion of the 1km study area for operational noise effects from the BESS and substations has the potential to exclude noise sensitive receptors from the assessment. The ES should explain how the study area and sensitive receptors have been selected with reference to the extent of likely impacts and relevant supporting evidence such as modelling and/ or relevant guidance. Effort should be made to agree the study area(s) with relevant consultation bodies. The applicant is directed to consider that noise and vibration effects of piling activities may require particular consideration. The study area(s) should be shown on a plan.
385	Para 12.6.2	Operational hours of HDD machinery	The Scoping Report states that in the event that HDD is used as a technique, the HDD machinery may operate “outside of core hours due to the nature of the activity requiring continuous drilling over the working period of any given drill”. The ES should confirm what the core hours are and which hours the HDD would be in operation for. If this technique is considered an option in the ES, baseline sound monitoring should be undertaken during the non-core hours in order to represent the baseline during this time.

ID	Ref	Description	Inspectorate's comments
386	Para 12.5.3	Baseline sound monitoring surveys	The Scoping Report states that the majority of the site is comprised of farmland and that seasonal agricultural activities contribute to ambient sound conditions. The applicant should make efforts to undertake baseline sound monitoring surveys that capture periods of high and low agricultural activities.
387	Para 12.5.4	Sensitive receptors	The Scoping Report does not describe what constitutes a sensitive receptor in the Noise and Vibration chapter. The features identified on figure 12-1 include: campsite, care home, hotel and guest house, office, place of worship, and residential. In the absence of other information, the Inspectorate assumes that these categories represent noise and vibration sensitive receptors. The Inspectorate notes that typical sensitive receptors including, but not limited to, schools are not included in the figure or discussed in the Noise and Vibration chapter but are discussed elsewhere in the Scoping Report. The ES should explain how the list of sensitive receptors was determined, with reference to relevant guidance.

3.9 Socio-Economics

(Scoping Report section 13)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
39.1	Table 13-2	Employment, economic growth and training effects (all phases)	The Scoping Report proposes to scope out this impact on the basis that the majority of the workforce is expected to be met by the relocation of existing trained workforces, and the operational phases requires minimal staff. The Inspectorate agrees with this approach.
39.2	Table 13-2	Effects on private assets (all phases)	The Scoping Report proposes to scope out this impact on the basis that there would be no land-take from residential properties, businesses or community facilities. Potential impacts on these receptors from indirect effects will be addressed in the Health chapter. Noting that farming businesses are considered separately, the Inspectorate agrees with this approach.
39.3	Table 13-2	Effects on development land including mineral safeguarding (all phases)	The Scoping Report proposes to scope out this impact on the basis that there are no development or allocated sites within the scoping boundary, and that mineral sterilisation would not be permanent, meaning that the resources would be available after the scheme has ended. The Scoping Report states that the Minerals Planning Authority has been consulted and indicates that this body agrees that there is no impact on future minerals extraction. The Inspectorate agrees to scope this matter out.
39.4	Table 13-2	Effects on PRow (construction, operation)	The Scoping Report proposes to scope this impact out of the socio-economic assessment on the basis that this impact is addressed in the Health chapter. The Inspectorate agrees with this approach, though advises that impacts should also be considered in the Transport and Access chapter. Cross-references to the Health and Transport chapters in the ES should be considered for clarity. The Scoping Report does not state whether effects on PRow during the decommissioning phase are scoped in or out of the assessment. The Inspectorate assumes that the same approach of assessing effects in the Health and Transport chapters will be taken.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
395	Table 13-2	Effects on farming businesses (construction)	The Scoping Report proposes to scope out this impact on the basis that farming businesses will experience temporary/ short-term loss of use of land when the works to lay cables are ongoing, that business use will be unchanged after construction, and that the renting of land supports diversification. The Inspectorate is in agreement with this approach.
396	Table 13-2	Effects on accommodation (operation)	The Scoping Report proposes to scope out this impact on the basis that there will be a limited number of workers during the operational phase, and therefore a limited requirement for accommodation. The Inspectorate agrees with this approach.

ID	Ref	Description	Inspectorate's comments
397	Para 13.4.2	Study area	The Scoping Report states that the study area for direct effects is the scoping boundary, including the extent of receptors beyond this boundary where they are contiguous. The ES should confirm how this extent is defined and show the study area and receptors on a plan. Efforts should be made to agree the study area with relevant consultation bodies.
398	Para 13.7.9	Assessment methodology	The Scoping Report proposes that the scale of effects will be assigned criteria such as (paraphrased): • Minor: a small number of receptors are affected • Moderate: a noticeable number of receptors are affected • Major: all or a large number of receptors are affected The ES should explain how the terms 'small', 'noticeable' and 'large' are defined and applied in the assessment, with reference to relevant guidance where possible.

3.10 Air Quality

(Scoping Report section 14.1)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.10.1	Para 14.1.28, table 14-2	Air quality impacts (operational phase)	Assessment of air quality impacts during operation of the proposed development, including road traffic emissions and auxiliary emergency generators is proposed to be scoped out. On the basis of the information set out in paragraphs 14.1.26 to 14.1.28, the Inspectorate agrees that this matter can be scoped out of the assessment, subject to confirmation of the frequency, vehicle routing, and type of vehicles during operation within the ES description of the proposed development and that these are shown to be below relevant assessment threshold criteria, based on the latest Institute of Air Quality Management (IAQM) guidance.
3.10.2	Table 14-2, para 14.1.49	Dust emissions and road traffic emissions (construction, decommissioning)	The Scoping Report states that road traffic flows would be below IAQM screening criteria on all road links during construction and decommissioning phases. However, the Scoping Report also states that specific information about construction vehicle movements is not available for the report. The Scoping Report considers that, based on professional judgement and experience of similar solar farm infrastructure projects and in line with consented solar NSIPs, it is unlikely that such impacts would contribute to a significant effect and a detailed air quality assessment of construction phase road traffic emissions is not required. Instead, a screening assessment of construction phase road traffic emissions impacts is considered more proportionate and will be undertaken. The Scoping Report also states that dust emissions would be controlled through dust control measures in the oCEMP and oOEMP for construction and decommissioning activities respectively, without the need for additional specific assessment of effects as this would avoid significant effects.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			The Inspectorate agrees with the proposed screening approach. However, an indication of vehicle numbers and types, or the results of the screening exercise, are needed in order to conclude the absence of a likely significant effect. In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is therefore not in a position to agree to scope this matter from the assessment. Accordingly, the ES should include an assessment of dust emissions and traffic emissions during construction and decommissioning phases. Efforts should be made to engage with relevant consultation bodies. All assessments should be subject to confirmation of the frequency, vehicle routing, and type of vehicles during construction and decommissioning phases.
3.103	Para 14.1.52, table 14-2	Non-road mobile machinery (NRMM) emissions assessment (construction, decommissioning)	It is proposed that the impact of NRMM emissions on air quality is scoped out of the assessment. The Scoping Report states that construction and decommissioning related plant emissions are anticipated to represent a small source of emissions relative to ambient local conditions in the vicinity of the site, based on the scale of work that would occur and the number of plant vehicles that would be required. Good practice measures based on advice prescribed in the IAQM guidance would be incorporated into the oCEMP and oDEMP, and effective dust management measures can be incorporated in the oCEMP to avoid significant effects. In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope this matter from the assessment. Accordingly, the ES should include an assessment of emissions during construction and decommissioning phases from NRMM. The applicant is encourage to consult with relevant consultation bodies and the assessment should be subject to confirmation of the frequency and type of NRMM within the ES description of development during construction and decommissioning phases.

ID	Ref	Description	Inspectorate's comments
3.104	Para 14.1.30	BESS – battery fire risk and air quality effects	Due to the chemical nature of the BESS, the Scoping Report states that there is the potential for local air quality to be negatively impacted by a BESS fire and that the DCO application will be accompanied by a fire safety assessment examining the area of potential air quality effects in the event of a fire at the BESS, including an initial fire plume appraisal of the impact of potential emissions from a BESS fire using an appropriate dispersion model. The ES should set out an assessment of any likely significant air quality effects with respect to all relevant human and ecological receptors from a potential battery fire event following consultation with relevant consultation bodies. This assessment should be cross-referenced to the major accidents and disasters section within the ES.
3.105	Paras 14.1.55 to 14.1.56	Cumulative Effects	The applicant is encouraged to agree the Zone of Influence (ZoI) and the list of other developments included in the assessment of cumulative air quality and dust impacts with relevant consultation bodies where possible. Evidence of this should be included in the ES and cross-referenced to relevant ES chapters such as Cultural Heritage, Health and Biodiversity where necessary.

3.11 Soils and Agriculture

(Scoping Report section 14.2)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.11.1	Table 14-11	Food production (construction, decommissioning)	The Scoping Report states that Defra recognises that food production levels nationally could be maintained or moderately increased alongside land use change for solar developments and proposes to scope out this matter. The Scoping Report states that the proposed development is unlikely to materially affect food production. The Inspectorate is in agreement with this approach.
3.11.2	Table 14-11	BMV land (operation)	The Scoping Report considers that there would be no further development of built infrastructure during operation and therefore no further impacts on BMV land will result from operation. Management and monitoring of soils are to be addressed in the oOEMP. The ES should describe how infrastructure has been located to avoid/ minimise impacts on BMV land during the operational phase. Impacts should be assessed where significant effects are likely to occur. The applicant's attention is drawn to comments from ERYC at appendix 2 of this Opinion with regard to the definition of 'magnitude of change' for loss of BMV land. The ES should use appropriate guidance to define magnitude of change and apply these parameters to the assessment.
3.11.3	Table 14-11, paras 14.2.32, 14.2.36 to 14.2.41	Soil resources (operation)	The Scoping Report states that the land would recover from intensive use during operation, allowing the soil condition and structure to improve, and management and monitoring of soils are to be addressed in the oOEMP. The applicant's attention is drawn to comments from the EA at appendix 2 of this Opinion with regard to thermal impact upon peat soil. The Inspectorate agrees that this matter can be scoped out of the assessment providing that the oOEMP includes suitable mitigation for all operational activities with respect to soil resources.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			The ES should describe how infrastructure has been located to avoid/ minimise impacts on soil resources during the operational phase. Impacts should be assessed where significant effects are likely to occur and activities that could have impacts on soil resources should be assessed in the ES.

ID	Ref	Description	Inspectorate's comments
3.114	Para 14.2.9	Study area	The Scoping Report proposes that no buffer would be applied when describing the study area as the impacts to soils and agricultural land only occur on the land that is directly impacted by proposed development. The ES should consider any adjoining agricultural land that might be affected, such as from changes to drainage patterns, and should provide a clear justification for the extent of the study area chosen and how this relates to the extent of any likely impacts. The study area should be clearly depicted on figures to aid understanding.
3.115	Para 14.2.14	Agricultural Land Classification (ALC)	The applicant should ensure that a sufficient number of auger locations are used across the site to accurately inform the assessment in line with relevant guidance and/ or standards (for example, NE Technical Information Note TIN049, 2012), or justify why its proposed approach is robust, seeking agreement from relevant statutory bodies. Detailed ALC surveys should be undertaken for any permanent infrastructure and should be used to inform the final design of the proposed development. The assessment should have regard to the updated Guidelines for Grading the Quality of Agricultural land from Defra (2025).
3.116	Para 14.2.15	BMV classification	The ES should contain a clear tabulation of the areas of land in each BMV classification to be temporarily or permanently lost as a result of the proposed development, with reference to accompanying map(s) depicting the grades. Specific justification for the use of the land by grade should be provided. Consideration should be given to the use of BMV land in the applicant's discussion of alternatives

ID	Ref	Description	Inspectorate's comments
3.11.7	Para 14.2.16, figure 14-2-1, tables 14-3, 14-4	Predictive Agricultural Land Classifications	Table 14-4 presents the total division of agricultural land by ALC grade within the Humberhead Sites with areas expressed in hectares (ha) based on Predictive ALC Map. The applicant should ensure that the survey of ALC has sufficient coverage across the proposed development including the cable route for the ES and any approach to determining ALC grades is justified, aligns with relevant guidance and/ or standards (for example, NE Technical Information Note TIN049, 2012). Efforts should be made to agree the approach with relevant consultation bodies.
3.11.8	Paras 14.2.25 to 14.2.47	Potential effects and mitigation	Effects on soil resources and agricultural land are expected to be temporary as soils and land will be reinstated to the current baseline. The ES should consider the impact on soil resources as a result of the potential release of contaminants from equipment, for example, from metals, broken glass or other chemicals from damaged solar panels. The ES should assess the likelihood of any likely significant effects from soil contamination from the proposed development cross-referencing to other relevant chapters in the ES. Mitigation measures should be clearly set out demonstrating how these would be secured through the DCO where necessary.

3.12 Materials and Waste

(Scoping Report section 14.3)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.121	Para 14.3.80, table 14-24	Materials use (all phases)	The Scoping Report proposes to scope out a materials assessment and changes in the availability of materials on the basis that the expected quantities of construction materials (steel, concrete, aggregates, asphalt) are not anticipated to significantly affect UK or regional availability of these materials. The Inspectorate is in agreement with this approach for construction materials only. The Scoping Report does not describe the types and quantities of materials required for other elements of the proposed development, including but not limited to the solar panels, batteries, or other electrical infrastructure. In the absence of information relating to these materials, the Inspectorate is not in a position to scope out a materials assessment for non-construction (steel, concrete, aggregates, asphalt) materials. The ES should include an assessment of these effects during the construction and operational phases of the proposed development or demonstrate the absence of likely significant effects with evidence of agreement from relevant consultation bodies.
3.122	Table 14-24	Waste arising from extraction, processing, and manufacture of construction components and products (all phases)	The Scoping Report proposes to scope out this impact on the basis that it cannot be accurately predicted and assessed in the ES as it relates to procurement decisions that cannot be assured. The Inspectorate agrees with this approach.
3.123	Table 14-24	Environmental impacts associated with management of waste	The Scoping Report proposes to scope out environmental impacts associated with management of waste (such as impact on water resources, air quality, noise or traffic resulting from the generation, handling, on-site temporary storage or offsite transport of

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		from the scheme (all phases)	materials and waste) on the basis that these impacts are addressed separately in other ES chapters. The Inspectorate agrees with this approach.
3.124	Table 14-24	Environmental impacts associated with the operation of offsite waste management facilities used by the scheme (all phases)	The Scoping Report proposes to scope out these impacts on the basis that these environmental impacts are managed by the plans and permits for the relevant facilities. The Inspectorate agrees with this approach. The ES and relevant management plans should confirm that the waste management providers and facilities used during the lifetime of the proposed development have the appropriate permits and licences for the relevant activities.
3.125	Table 14-24	Changes to allocated/safeguarded waste or mineral sites (all phases)	The Scoping Report proposes to scope out these impacts on the basis that there are no allocated or safeguarded waste or mineral sites within the scoping boundary. The Inspectorate agrees with this approach.
3.126	Table 14-24	Changes to permitted waste sites (all phases)	The Scoping Report proposes to scope out this impact on the basis that the two identified permitted waste sites within the CRSC will be avoided as the cable route is defined. The Inspectorate agrees with this approach.

ID	Ref	Description	Inspectorate's comments
3.127	Para 14.3.82	Cumulative effects assessment	The Scoping Report proposes that the cumulative effects assessment will include only planning applications for solar schemes within the last five years on the basis that these schemes are likely to be decommissioned within a similar timeframe to this proposed development. The Inspectorate is not in agreement with this approach. The assessment of cumulative effects should be based on the expected waste generation of planned or consented schemes within the study area for waste. Where this excludes certain types of development, this should be justified in the ES with reference to relevant guidance.

ID	Ref	Description	Inspectorate's comments
			The Scoping Report does not identify whether cumulative materials effects will be assessed in the ES. In the absence of information such as evidence demonstrating clear agreement with relevant consultation bodies, the Inspectorate is not in a position to agree to scope out this matter from the assessment. The ES should include an assessment of cumulative materials effects or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a likely significant effect. The applicant's attention is drawn to ISEP guidance on the assessment of waste and materials impacts.
3.128	Paras 14.3.54 to 14.3.59	Solar scheme specific wastes	Paragraphs 14.3.54 to 14.3.59 propose that facilities for solar panel recycling will become more available during the lifetime of the proposed development. The ES and relevant management plans should describe how wastes relating to solar panels will be managed in the worst-case scenario of such facilities not being available or insufficient capacity. Any likely significant effects arising from this activity should be assessed in the ES, including effects relating to the replacement of solar panels during the operational phase.
3.129	Paras 14.3.38, 14.6.24	Landfills	Paragraph 14.3.38 states that there are no authorised landfills within the scoping boundary. However, paragraph 14.6.24 states that there is an authorised landfill partially within the CRSC. The ES should identify all authorised landfills within the study area and show these on a plan. The ES and relevant management plans should describe how effects relating to landfill disturbance and migration of contaminants, landfill gas and landfill leachate, will be managed. The applicant's attention is drawn to comments from the EA at appendix 2 of this Opinion; engagement with the EA to identify and characterise all current and historic landfills within the study area is encouraged.

3.13 Glint and Glare

(Scoping Report section 14.4)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.131	Table 14-25	All elements (construction, decommissioning)	The Scoping Report states that potential glint and glare effects during the construction and decommissioning phases will be limited and less than during the operational phase. The Inspectorate agrees that glint and glare effects during construction and decommissioning phases are likely to be less than during operation of the proposed development but considers that the ES should consider the potential for significant effects during construction and decommissioning, including cumulative effects as part of the assessment. Any mitigation measures that are considered necessary should be set out in the ES and secured through the DCO. Matters which the Inspectorate agree can be scoped out during operation of the proposed development shown below and as set out in table 14.2 can however also be scoped out of the assessment for construction and decommissioning phases.
3.132	Table 14-25, para 14.4.13	Minor roads (operation)	The Scoping Report states that minor roads are low speed and adverse safety effects of glint and glare from solar panels is negligible at low speeds. On this basis the Inspectorate agrees that this matter can be scoped out of further assessment.
3.133	Table 14-25, paras 14.4.14, 14.4.48	Aviation (air traffic control towers) (operation)	The Scoping Report states that Pocklington Airport does not have an air traffic control tower and there are no other aerodromes within the vicinity of the proposed development. Paragraph 14.4.48 states that potential for glint and glare to result in distraction or nuisance to pilots, having regard to receptor location, flight paths, and duration of effects will be scoped into the assessment. On this basis the Inspectorate agrees that significant effects on air traffic control towers can be scoped out of further assessment.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.134	Table 14-25, para 14.4.15	Rail (operation)	The Scoping Report states that there are no railways within the 1km study area for glint and glare effects. The Inspectorate agrees that significant effects are not likely over this distance and that impacts from glint and glare on rail receptors can be scoped out of further assessment.
3.135	Table 14-25, para 14.4.16	Riverways and canals (operation)	The Scoping Report states that identified waterways within the vicinity of the proposed development are narrow and low speed, so that any potential adverse safety effects from glint and glare from solar panels is negligible. On this basis the Inspectorate agrees that significant effects are unlikely and that this matter can be scoped out of further assessment.
3.136	Table 14-25, paras 14.4.17 to 14.4.18	PRoW users (operation)	The Scoping Report states that glint and glare would not represent an adverse safety concern for PRoW users as these can mitigate potential glint and glare effects through simple actions. On this basis the Inspectorate agrees that significant effects are unlikely and that this matter can be scoped out of further assessment.

ID	Ref	Description	Inspectorate's comments
3.137	Para 14.4.2	Glint and glare assessment and significant effects	A glint and glare assessment is intended to accompany the ES and DCO application with any significant effects identified expected to be reduced to not significant through iterative design changes or mitigation screening. The applicant should ensure that any potential likely significant effects identified in the technical assessment are assessed in full in the relevant chapter of the ES. Where professional judgement has been applied this should be identified. ES aspect chapters (such as LVIA and Cultural Heritage) should cross-refer to the glint and glare assessment where relevant.

ID	Ref	Description	Inspectorate's comments
3.138	Paras 14.4.8 to 14.4.10	Study area	The ES should provide further justification for this study area with reference to a ZTV and based on the maximum extent of likely significant effects. Where possible, the study area should be agreed with the relevant consultation bodies.

3.14 EMF

(Scoping Report section 14.5)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.14.1	Table 14-27	Electromagnetic fields (EMF) effects on human health from 400kV Grid Connection Cables (construction, decommissioning)	The Scoping Report states that the proposed development's electrical infrastructure will not be energised and therefore will not generate any EMF during these phases. Temporary construction plant may give rise to negligible and short-term electromagnetic emissions but these are not considered to give rise to likely significant effects. The Inspectorate agrees that EMF effects during construction and decommissioning of the proposed development can be scoped out of the ES on this basis.
3.14.2	Table 14-27	EMF effects on human health from other electrical infrastructure associated with the Scheme (132kV/ 33kV underground cables, transformers, inverters, substations, BESS) (construction, decommissioning)	The Scoping Report states that the proposed development's electrical infrastructure will not be energised during construction and decommissioning and therefore will not generate any EMF. The Inspectorate agrees that EMF effects during construction and decommissioning of the proposed development can be scoped out of the ES on this basis.

ID	Ref	Description	Inspectorate's comments
3.14.3	Paras 14.5.44, 14.5.51 to 14.5.54,	EMF assessment	The Scoping Report proposes that an EMF assessment will be included as a technical appendix to the Other Environmental Matters chapter of the ES. The Inspectorate considers that an EMF assessment should include the location, routing, and voltages of any cables over 132kV and a risk assessment to any human and ecological sensitive receptors and should consider cumulative effects.

ID	Ref	Description	Inspectorate's comments
	table 14-27		The Other Environmental Matters chapter of the ES should identify any significant effects resulting from EMF. ES aspect chapters (such as Health) should cross refer to the EMF assessment where relevant.
3.144	Para 14.5.55	Receptor sensitivity	The Scoping Report states that the voltage of the grid connection cables is likely to be 400kV. In line with relevant guidance (DECC Power Lines: Demonstrating compliance with EMF public exposure guidelines, A Voluntary Code of Practice 2012), cables above 132kV have potential to cause EMF effects. The Inspectorate considers that the ES should demonstrate the design measures taken to avoid the potential for EMF effects on receptors. The ES should detail any design measures taken to avoid potential adverse effects from EMF in consultation with relevant consultation bodies as necessary.

3.15 Ground Conditions

(Scoping Report section 14.6)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.15.1	Para 14.6.46	Separate Ground Conditions chapter	The Scoping Report proposes to scope out a separate Ground Conditions chapter on the basis that a Preliminary Risk Assessment (PRA) will provide information on potential source, pathway, receptor linkages and recommendations for mitigation measures and further works. The application of the recommended mitigation measures is proposed to reduce residual effects so that they are no longer likely to be significant. A brief overview of the Ground Conditions assessment and PRA results is proposed to be included in the Other Environmental Matters chapter of the ES. The Inspectorate agrees that a standalone chapter is not necessary and that matters related to ground conditions can be included in the Other Environmental Matters chapter. The ES should ensure that sufficient information regarding likely significant effects and the proposed mitigation is provided. Any mitigation measures that are considered necessary should be set out in the ES and secured through the DCO.
3.152	Table 14-28	All Ground Conditions elements related to operation	The Scoping Report proposes to scope out these impacts on the basis that maintenance activities during the operational phase will be managed through an OEMP; an oOEMP will be submitted with the DCO application. The Inspectorate agrees that this matter can be scoped out of the assessment providing that sufficient detail is provided in the oOEMP in regard to the proposed mitigation measures. The applicant's attention is drawn to box 2.1.6 of this Opinion regarding the level of detail required in outline plans.

ID	Ref	Description	Inspectorate's comments
3.15.3	N/A	Ground conditions effects	The ES should ensure that the scope of the matters discussed in the ground conditions section is made clear. Where similar matters are discussed in other chapters, such as soils, water resources and archaeology, the ES should identify where there is cross-over and reference other chapters or sections where appropriate for clarity.

3.16 Major Accidents and Disasters

(Scoping Report section 14.7)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.16.1	Table 14-32, para 14.7.30	Major accidents and disasters (MA&D) (all phases)	A standalone assessment of Major Accidents and Disasters is proposed to be scoped out as the Scoping Report states that all this will be adequately covered elsewhere in the ES. The Inspectorate agrees that a standalone chapter on MA&D is not required but any risks as highlighted in tables 14-29, 14-30 and 14-31 should be clearly cross-referenced to the relevant aspect chapters in the ES and should highlight where any likely significant effects may occur including cumulative effects, and what mitigation measures are proposed if necessary to be secured through the DCO application.

ID	Ref	Description	Inspectorate's comments
3.162	Appendix 14-A	Long list of potential MA&D	The applicant is encouraged to consult with relevant consultation bodies on the potential risks of MA&D and any likely significant effects. The applicant's attention is drawn to the comments from the Health and Safety Executive on the Control of Major Accidents and Disasters ('COMAH') within the study area.
3.163	N/A	Unexploded ordnance (UXO)	The Scoping Report does not describe the risk presented from UXO. The ES should ensure that this risk is described and included in the MA&D assessment where necessary.
3.164	N/A	Risks from fire	The Scoping Report proposes that the oBSMP will provide sufficient mitigation for risks to waterbodies resulting from firewater (such as from fire suppression or contaminated runoff) and therefore that this risk does not need to be included in a MA&D assessment. The oBSMP has not been provided with the Scoping Report and therefore the Inspectorate is not in a position to confirm whether the proposed mitigation is sufficient to manage this risk. The Inspectorate considers that this risk should be scoped into the

ID	Ref	Description	Inspectorate's comments
			Water Environment chapter. The applicant's attention is drawn to comments from the EA at appendix 2 of this Opinion regarding the scope of this assessment and the level of detail to be included in the oBSMP.
3.165	Tables 14-29, 14-30	Pollution incidences	Tables 14-29 and 14-30 do not indicate whether surface water or aquatic receptors are included as a receptor for pollution incidents during the construction and decommissioning phases. For the avoidance of doubt, the ES should include surface water receptors as relevant sensitive receptors for pollution incidents.

3.17 Arboriculture

(Scoping Report section 14.8)

ID	Ref	Applicant's proposed aspect to scope out	Inspectorate's comments
3.17.1	Para 14.8.77	Separate arboriculture chapter	The Scoping Report proposes to scope out a separate arboriculture chapter on the basis that an Arboricultural Impact Assessment will be produced as an appendix to the LVIA chapter and will describe any mitigation required for identified impacts to trees and hedgerows. The Inspectorate agrees with this approach.

ID	Ref	Description	Inspectorate's comments
3.172	N/A	N/A	N/A

3.18 Telecommunications and Utilities

(Scoping Report section 14.9)

ID	Ref	Applicant's proposed aspect to scope out	Inspectorate's comments
3.18.1	Para 14.9.12	Telecommunications and utilities	The Scoping Report proposes to scope out an assessment of effects relating to telecommunications and utilities on the basis that a desk-based study and consultation will identify all relevant utilities and, should impacts be identified, the applicant will agree any necessary mitigation with the utilities providers, such as buffer distances. The Inspectorate agrees that this aspect can be scoped out of the ES. The ES and/ or relevant management plans should describe any identified impacts to utilities and any agreed or proposed mitigation measures deemed necessary to avoid significant effects. The applicant should explain how any necessary mitigation measures will be secured through the DCO.

ID	Ref	Description	Inspectorate's comments
3.18.2	Tables 14-33, 14-34	Utilities within the scoping boundary	Tables 14-33 and 14-34 identify the relevant utilities which are present within the scoping boundary. There are several utilities within these tables identified as 'other'. The ES and/ or relevant management plans should describe the nature of all utilities with the potential to be affected by the proposed development.
3.18.3	N/A	Overhead lines (OHL)	The Scoping Report identifies OHL within the scoping boundary. If the proposed development requires the temporary or permanent relocation of OHL, the potential for landscape and visual effects should be considered within the LVIA. The applicant's attention is drawn to comments from National Grid Electricity Transmission (NGET) providing information about electricity assets within the scoping boundary.

APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

TABLE A1: PRESCRIBED CONSULTATION BODIES

Bodies prescribed in schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended) (the 'APFP Regulations (as amended)')

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Secretary of State for Defence	Ministry of Defence
The relevant parish council or, where the application relates to land in Wales or Scotland, the relevant community council	Allerthorpe Parish Council
	Barmby Moor Parish Council
	Bubwith Parish Council
	Bielby Parish Council
	Cherry Burton Parish Council
	Cottingwith Parish Council
	Eastrington Parish Council
	Ellerton Parish Council
	Etton Parish Council
	Everingham Parish Council
	Foggathorpe Parish Council
	Gilberdyke Parish Council
	Goodmanham Parish Council
	Hayton and Burnby Parish Council
	Holme upon Spalding Moor Parish Council
	Hotham Parish Council
	Londesborough Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Lund Parish Council
	Market Weighton Town Council
	Melbourne Parish Council
	Middleton Parish Council
	Millington-cum-Givendale Parish Council
	North Duffield Parish Council
	Newbald Parish Council
	Newport Parish Council
	North Cave Parish Council
	Nunburnholme with Kilnwick Percy Parish Council
	Pocklington Town Council
	Sancton Parish Council
	Seaton Ross Parish Council
	Shipton Thorpe Parish Council
	South Cave Parish Council
	South Cliffe Parish Council
	Spaldington Parish Council
	Sutton upon Derwent Parish Council
	Thorganby Parish Council
	Thornton Parish Council
The Environment Agency	The Environment Agency
Natural England	Natural England

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Forestry Commission	The Forestry Commission - Yorkshire & North East
The Historic Buildings and Monuments Commission for England (known as Historic England)	Historic England
The relevant internal drainage board	Ancholme Internal Drainage Board
	Foss Internal Drainage Board
	Goole and Airmyn Internal Drainage Board
	Isle of Axholme and North Nottinghamshire Water Level Management Board
	Ouse and Derwent Internal Drainage Board
	Ouse and Humber Drainage Board
	Reedness and Swinefleet Drainage Board
The Canal and River Trust	The Canal and River Trust
The relevant Highways Authority	East Riding of Yorkshire Council - Highways
The relevant Highways Authority	National Highways
The Health and Safety Executive	Health and Safety Executive
NHS England	NHS England
The Crown Estate Commissioners	The Crown Estate
The relevant police authority	Humberside Police and Crime Commissioner
The relevant ambulance service	Yorkshire Ambulance Service NHS Trust
The relevant fire and rescue authority	Humberside Fire and Rescue Service

TABLE A2: RELEVANT STATUTORY UNDERTAKERS

‘Statutory undertaker’ is defined in The APFP Regulations (as amended) as having the same meaning as in section 127 of the Planning Act 2008 (PA2008)

STATUTORY UNDERTAKER	ORGANISATION
The relevant Integrated Care Board	NHS Humber and North Yorkshire Integrated Care Board
NHS England	NHS England
The relevant NHS Trust	Yorkshire Ambulance Service NHS Trust
Railways	National Highways Historical Railways Estate
Canal Or Inland Navigation Authorities	The Canal and River Trust
Universal Service Provider	Royal Mail Group
Homes and Communities Agency	Homes England
The relevant Environment Agency	The Environment Agency
The relevant water and sewage undertaker	Yorkshire Water
The relevant public gas transporter	Cadent Gas Limited
The relevant public gas transporter	Cadent Gas Limited
	CNG Services Ltd
	Energy Assets Pipelines Limited
	ES Pipelines Ltd
	Fulcrum Pipelines Limited
	GTC Pipelines Limited
	Harlaxton Gas Networks Limited
	Independent Pipelines Limited

STATUTORY UNDERTAKER	ORGANISATION
	Indigo Pipelines Limited
	Inovyn Enterprises Ltd
	Last Mile Gas Ltd
	Leep Gas Networks Limited
	Mua Gas Limited
	National Gas
	Northern Gas Networks Limited
	Quadrant Pipelines Limited
	Scotland Gas Networks Plc
	Stark Infra-Gas Limited
	Southern Gas Networks Plc
	Wales and West Utilities Ltd
The relevant electricity distributor with CPO Powers	Northern Powergrid (Yorkshire) plc
	Advanced Electricity Networks Ltd
	AGR Networks Ltd
	Aidien Ltd
	Aurora Utilities Ltd
	Edge Utility Networks Ltd
	Eclipse Power Distribution Limited
	Eclipse Power Network Limited
	Energy Assets Networks Limited
	ESP Electricity Limited
	Fulcrum Electricity Assets Limited
	Green Generation Energy Networks Cymru Ltd

STATUTORY UNDERTAKER	ORGANISATION
	Grid Line Power Networks
	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
	Sphere Energy Connect Ltd
	Stark Infra-Electricity Ltd
	The Electricity Network Company Limited
	UK Power Distribution Limited
	Utility Assets Limited
The relevant electricity transmitter with CPO Powers	National Grid Electricity Transmission Plc
	National Energy System Operator (NESO)

TABLE A3: LOCAL AUTHORITIES AS DEFINED IN SECTION 43(3) OF THE PA2008

LOCAL AUTHORITY
City of Doncaster Council
City of York Council
East Riding of Yorkshire Council
Hull City Council

LOCAL AUTHORITY
North Yorkshire Council
North Lincolnshire Council

TABLE A4: NON-PRESCRIBED CONSULTATION BODIES

ORGANISATION
Hull and East Yorkshire Combined Authority

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE:
City of Doncaster Council
East Riding of Yorkshire Council
Environment Agency
Forestry Commission
Foss Internal Drainage Board
Fulcrum Pipelines Ltd
Health and Safety Executive
Historic England
Humberside Fire and Rescue Service
Ministry of Defence
National Gas
National Grid Electricity Transmission Plc
Natural England
North Lincolnshire Council
Northern Gas Networks Limited
Nunburnholme with Kilnwick Percy Parish Council
Pocklington Town Council
Seaton Ross Parish Council
Sphere Energy Connect Ltd
The Canal and River Trust

Your Ref EN0110032

Our Ref CRTR-IPP-01010-01

Monday 22 June 2026

Proposal: Scoping Consultation under Regulations 10 and 11

Project Name: Humberhead Solar Project

Waterway: Pocklington Canal

Thank you for your consultation in respect of the above.

The Trust is 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 (NSIP) process.

The Trust own and manage the Pocklington Canal. The proposals include a cable crossing of the Pocklington Canal and a Solar Farm to the immediate North West of the waterway (solar farm 1-1).

The canal is designated as a Site of Special Scientific Interest (SSSI). The canal also benefits from the presence of listed structures including Silburn Lock and Giles Lock, which are located next to the site of solar farm 1-1, and Coate's Bridge, Coat's Lock and Sandhill Lock within the proposed cable corridor area.

Having reviewed the submitted details, we wish to raise the following comments on the scheme:

Proposed Red Line Boundary for Humberhead Site 1-1.

The red line boundary for the solar farm (1-1), as drawn in the figures attached to the Scoping Report, includes the towpath of the Pocklington Canal and a portion of the waterspace of the canal. This is repeated in the majority of the drawings provided (e.g. Figure 3-1-1).

We expect that this is an error, and that the development of the solar field itself is not proposed within the canal area. To avoid confusion, however, **we request that the plans should be rationalised and amended** to avoid any potential confusion.

Landscape and Visual Effects

Chapter 7 of the Scoping Report details that a Landscape and Visual Impact Assessment will be carried out in line with GLVIA3 methodologies. 7.4 details that the canal is within the study area for the analysis of the impact of the cable corridor and solar farm 1-1.

Canal & River Trust Spatial Planning Team

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We have identified that the Pocklington Canal is not listed as a landscape receptor in table 7-3. This could negatively affect the overall visual impact assessment process in a future LVIA. We therefore request that the canal should be specifically included as a receptor for the LVIA assessment process.

We note that 7.5.1 suggests they will review the Wolds Way National Trail Pocklington Canal route; it would be positive if it could be confirmed that this covers the Pocklington Canal towpath in its entirety in scope, as the towpath should be assessed on a standalone basis due to walkers and cyclists on the PC being visual receptors of the scheme.

Looking at P6/9 of the report figures showing viewport locations, the redline site boundaries suggest a solar farm site in very close proximity to the west of Pocklington Canal, and another to the east at a greater but potentially visible distance.

We do question whether viewpoints 35 and 36 would capture all the potential changes to views from the canal, and more viewpoints may be required to enable a full analysis of the impact of the site to the west (solar farm 1-1). Views with summer and winter month representations would be required to understand the impact of seasonal foliage loss. Given proximities, photomontages or wireframe views would help.

In terms of the landscape effects, there is a risk that the solar farm could have harsh visual consequences to settings if appropriate siting, landform and mitigation is not well considered. Paragraph 7.6.7 identifies potential mitigation measures, which include woodland planting and the bolstering of boundary hedgerows and trees. This likely would be a reasoned form of mitigation on the premise that this would require an accepted change in the sense of rural openness. We request that the setback of the built form of the farm within master planning from the curtilage with the canal should also be considered as mitigation, as well as considerations to setback of boundary treatments. Care would need to be given to the design of any boundary treatments on site, in addition to the location and siting of access roads and substations to reduce the visual impact to sensitive landscapes and assets.

Biodiversity

Table 8-1 within Chapter 8 of the Scoping Report provides a description of the Pocklington Canal SSSI. The description is taken from Natural England's Citation Document, which is generally accurate. We wish to highlight that part of the canal is navigable, so reference to the canal as 'unrestored' is out of date.

In addition to the description in table 8-1, we wish to highlight that our records show that the canal supports an large assemblage of aquatic invertebrates. The canal and its margins support a breeding bird community typical of lowland open waters and their margins, including tufted duck, kingfisher, grey wagtail, sedge warbler, reed warbler and reed bunting. Additionally, the fringing hedges and scrub hold species such as turtle dove and whitethroat. **Consideration for these species should be given with any associated assessment within the Environmental Assessment.**

Paragraph 8.3.1 provides a list of consultees for the Environmental Assessment. Given the proximity of works to the canal, and our direct ownership and management of the SSSI habitat, we request that the Trust should be included as a consultee to inform the assessment.

We have no significant issue with the habitats and fauna identified in the scoping report between paragraphs 8.5.26 to 8.5.55. We wish to highlight that preliminary evidence has been made available to the Trust that beaver may be present on the Pocklington Canal (subject to confirmation), and it may be the case that impacts on this species may need to be included.

Section 8.6 identifies effects and mitigation. We note that the section identifies opportunities for grazing alongside the panels. This could replace existing plant-growing agriculture, and result in alterations to land practices near to the canal. **There is a risk that grazing animals could increase nitrate runoff to watercourses, and we request that this impact with respect to the Pocklington Canal SSSI should be assessed.** If grazing is proposed, then mitigation in the form of water runoff controls may be required.

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Horizontal Directional Drilling (HDD) is proposed to allow a cable crossing below the Pocklington Canal SSSI. HDD has the potential to cause vibrational impacts that could impact waterborne species, including fish. This impact of this is not discussed in the Scoping Report, and **we request that it should be included in any Environmental Assessment with regards to the construction effects.**

The wider Scoping Report suggests that HDD will be designed to be installed 1.5m below the bed of watercourses (e.g. paragraph 9.6.8). This is significantly less than the Trust request for installations below our network, where a minimum distance of at least 3.5m is normally requested. The lack of depth could increase the risk of vibrational and electromagnetic impacts on wildlife within the canal, **and we request that this should be amended.**

Water Environment

Section 9.6 considers the potential impact of the construction (and decommissioning) phase of development on the water environment. We believe the Pocklington Canal could be potentially impacted through vibrational impacts to the canal bed caused by Horizontal Directional Drilling (which could dislodge sediment), or runoff from exposed stockpiles or soils associated with nearby construction areas (notably solar farm 1-1). **We request that the canal should be specifically referenced in paragraph 9.6.3 in addition to the Beck and River Foulness.**

We identify that mitigation will largely be determined through Construction Management details. We request that **the final CEMP details should include commitments, with enforceable measures and monitoring requirements, to ensure that any identified mitigation is effective.**

In addition, the depth of HDD activities should be fully justified to limit the potential impact to the habitat above. As highlighted above, we have significant concern that a depth of only **1.5m below the watercourse would likely be insufficient to limit vibrational impacts to the watercourse above, and request that a depth of at least 3.5m should be utilised.**

Cultural Impact

Chapter 10 identifies heritage assets associated with the Pocklington Canal that could be impacted by the proposals.

Silburn and Giles Lock are both grade II assets, and are in locations where Solar Farm 1-1 could have a direct impact on the setting of these assets.

The assets associated with the canal are characterised by their setting within a rural agricultural environment, and there is a risk that the development of the solar farm could replace this with a setting of power generation, that could impact how the heritage assets are seen and appreciated.

Paragraph 10.6.6 suggests mitigation, including the use of setbacks. This would be appropriate, especially where the red line borders the canal. Existing tree and hedgerows along the canal are permeable (especially in winter) and allow for views of the fields behind. **As a result, any set back would need to be appropriately designed to help reduce the direct impact of any new power generation on the setting of the assets.** Ideally this would be pushed back to a natural/historical boundary, as although a new boundary would screen the panels, it could be seen as introducing a non-authentic boundary into a historic landscape which would have some level of impact on the significance the listed assets derive from their setting.

HDD activities could result in vibrations that could impact heritage assets above, and we request that consideration of this should be included in the Environmental Assessment.

Impact of Horizontal Directional Drilling Works

We request that details of Horizontal Directional Drilling Works should be provided so that any impact on the canal can be fully assessed.

Canal & River Trust Spatial Planning Team

E: planning@canalrivertrust.org.uk W: canalrivertrust.org.uk T: 0303 040 4040

To limit the potential for any damage to the canal, we request that specific details are provided in relation to the depth of the cable below the canal, and the location of send and receive pits.

As discussed above, a depth of 1.5m is considered to be likely insufficient to prevent vibrational damage to the canal above, and we request this is increased to at least 3.5m.

Other Comments

Consent as Landowner

As the promoter may be aware, the Trust will require any works in, under, over, or in close proximity to, the Trust's waterway infrastructure, to be carried out in accordance with the Trust's Third Party Works Code of Practice (which can be found at <https://canalrivertrust.org.uk/business-and-trade/undertaking-works-on-our-property-and-our-code-of-practice>). The Trust created the Code of Practice to provide to all third parties working in and around the Trust's network with expectations, standards and processes to ensure the integrity and safety of the network, safeguard operations and conserve its heritage and the natural environment, in line with its statutory duties and charitable objectives. Where nationally significant infrastructure projects have the potential to interact with, or impact, the Trust's network, the Trust secures protective provisions within the DCO. A draft set of these has been shared with the promotor. The standard protective provisions for the Trust ensure undertakers work with the Trust to design, construct, operate and maintain their new infrastructure in a way that minimises impact on the Trust's network. We expect most concerns raised by the Trust, about the Mylen Leah Solar Farm, will be adequately addressed through these protective provisions. We welcome discussion with the promotor, as more details about the project are identified and shared with the Trust. In our experience, early agreement of protective provisions can mean the Trust need only be minimally involvement in the examination process.

The applicant/developer is advised to contact the Canal & River Trust's Works Engineering Team via switchboard on 0303 040 4040 should they have any questions, require further information upon the Code of Practice, or seek clarification over the feasibility of pipeline routing below our network. Horizontal Directional Drilling crossing information can be found in Part 2 of the Code of Practice Section 2 Service Crossings.

Landowner consent would likely be required for the installation of a new cable below our waterways, due to the Trust's land ownership. The applicant is advised to contact the Trust's Utilities section at utilitiesenquiry@canalrivertrust.org.uk for further advice.

Please note that the Canal & River Trust is a statutory undertaker which has specific duties to protect the waterways. Accordingly, it is likely that we will resist the use of compulsory purchase powers which may affect our land or undertakings. We reserve the right to seek protections under S16 of the Acquisition of Land Act 1981 should any proposals affect land which has been acquired for the purposes of our undertaking. Accordingly, we require that the acquisition of any Trust land or rights over Trust land should be secured by agreement.

We encourage details of the applicant's land ownership requirements are provided and for negotiation for any land transfers to occur as soon as possible. Disposals by the Trust of operational land require internal approvals to satisfy its own policies and Charity Commission rules and time should be allowed for this in the transaction process.

Protective Provisions

Due to the proximity of works to the Pocklington Canal, including works below the waterway, we consider that Protective Provisions will be necessary for the protection of the Trust during the construction, operation and any decommissioning stages of the development.

We would welcome the opportunity to discuss this further during the development of the initial Development Consent Order. To assist with the applicant's drafting, we can provide a set of 'standard' draft protective provisions for the Trust, which can be used as a basis to work from and tailor to suit this development. **We would**

Canal & River Trust Spatial Planning Team

E: planning@canalrivertrust.org.uk W: canalrivertrust.org.uk T: 0303 040 4040

seek to reach agreement on the provisions at the earliest possible opportunity. Please contact myself on the details below should you wish to discuss this further.

I trust the above information is of use. If you or the applicant have any questions or require further information, please do not hesitate to contact me on the details below.

Yours Sincerely

██████████ GPI
Area Planner – Yorkshire and North East

██████████ canalrivertrust.org.uk
Fradley Junction, Alrewas, Burton-upon-Trent, Staffordshire, DE13 7DN

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

From: [REDACTED]@doncaster.gov.uk>
Sent: 24 June 2026 16:56
To: Humberhead Solar
Subject: Proposed application by Humberhead Solar Limited (the applicant) for an Order granting Development Consent for Humberhead Solar (the proposed development) - Scoping consultation.

FAO Georgia Pathy
Your Ref: EN0110032
Our Ref: 26/01042/CON

Dear Georgia,

Please be advised of the City of Doncaster's comments below;

Air Quality

No comments for AQ as it isn't near any of our AQMA's (being to the north of Doncaster) and so unlikely any effect from construction traffic in our AQMAs.

Ecology

We understand that the Council has been consulted at the scoping stage due to the scheme falling within the precautionary Zone of Influence associated with Thorne and Hatfield Moors SPA and Thorne Moors SAC. The proposal site lies outside this authority's administrative area, and the Council does not hold any specific information relevant to the assessment of the effects on the SPA/SAC beyond that available to the applicant, host authority, and statutory consultees. As such, we have no specific comments to make at this stage.

Transportation

Transport Assessment

A full Transport Assessment is likely to be required if any junction affected by the generated traffic arising from the proposal during the Operational Phase generate 30 or more two-way trips. This assessment should consider and not be limited to the following items:-

- Background and supporting national, regional, and local policy; and
- Local transport network existing conditions, including but not limited to

- o Pedestrian network;
- o Public Rights of Way;
- o Equestrian routes;
- o Cycle routes, informal or otherwise;
- o Public Transport network; and
- o Highway network,

including a summary of amenities accessible from the site on foot and by bicycle.

- Traffic surveys, ideally in a neutral month (April, May, June, September, October avoid days or weeks affected by Bank Holidays and school holidays).
- Traffic surveys to take the form of Manual Turning Counts (MTC) and Automatic Traffic Counts (ATC), the latter in place for a minimum of two weeks. MTCs to include Queue Length Surveys. The MTCs may be need to cover periods long than just the peak periods in order that they

can inform any Environmental Statement that may be required, and the need to develop traffic numbers for Air Quality and Noise calculations.

- Details of trip generation arising from the development by mode and their distribution across the network.
- Junction assessments to satisfy CDC (and also National Highways if the Strategic Road Network is affected) with the following scenarios:
 - o Base Year, using observed data to validate models against queue lengths;
 - o Opening Year, including committed development;
 - o Opening Year, including committed development and proposed development traffic;
 - o Design Year (Opening Year + 10 years), including committed development; and
 - o Design Year (Opening Year + 10 years), including committed development and proposed development traffic.
- Junction assessments showing mitigation of proposed development traffic to a level of operation commensurate with the same years' operation without the proposed development traffic.
- Mitigation may include non-junction aspects, such as improvements to the Active Travel and/or Public Transport networks.

Travel Plan

A Travel Plan targeting a 10% reduction in the predicted single-car occupancy by the end of the 5-year period after opening is required. This should draw on the finding of the Transport Assessment, and propose:-

- Bi-annual Manual Traffic Counts, to monitor modal split and car occupancy; and
- Annual Travel Questionnaire Surveys to monitor existing travel behaviour and likelihood to change mode with a 30% return sample rate.
- Appointment of a Travel Plan Co-ordinator.
- Travel Plan Bond: The Travel Plan needs to recognise a Travel Plan Bond necessary to mitigate any Travel Plan targets not being met. The value of the b- Bond is to be based on a price of the South Yorkshire 28-day Connect Plus ticket Index Linked at the time of any financial agreement (such as a Section 106 agreement). The value is calculated as:-
$$\text{No. of employees} \times \text{the current cost of a 28-day SY Connect+ ticket (based on the prevailing cost at the time, currently £162.20)} \times 1.1.$$

Construction Traffic Management Plan

A Construction Traffic Management Plan is required to detail the movement of construction traffic, the sizes and volumes of the different types involved, including management of staff travel from a travel planning point of view.

As many movements during construction are likely to comprise Heavy Goods Vehicles (HGV) a discussion is required on the suitability of construction routes. The timing of heavy vehicle movements and staff travel needs to be detailed and in particular if there are any schools on route.

If there is any phasing of construction, this needs detailing either for the different phases or for the peak phase(s) as appropriate.

Traffic management measures need to be detailed such as temporary traffic signals with associated signage and coning and how these meet the requirements set down in Chapter 8 of the Traffic Signs Manual.

Traffic and Transport Chapter of the Environmental Statement

Traffic and transport considerations are essential for a development because they ensure accessibility and connectivity for users, enhance safety and health through improved road safety and active travel options, assess infrastructure capacity to prevent congestion, improve transport links, and plan for future needs. These factors collectively ensure a development can mitigate environmental impacts and is safe and beneficial for both users and the wider community.

The Traffic and Transport chapter needs to assess the effects of the Proposed Development on the local transport network, including highway safety, disruption, and access for pedestrians, cyclists, and other road users. This chapter should be read in conjunction with the technical appendices, which include the Transport Assessment (TA), the Travel Plan (TP), and the Construction Traffic Management Plan (CTMP).

The chapter should the effects of the Proposed Development during both construction and operation phases and be prepared in accordance with best practice and latest guidance provided by the Institute of Environmental Management and Assessment (IEMA). The assessment methodology needs to apply both qualitative and quantitative approaches to determine the magnitude of impacts, sensitivity of receptors, and overall significance, assessing: driver delay, pedestrian and cyclist delay, pedestrian and cyclist amenity, fear and intimidation, accidents and safety, and severance.

Consultation Conditions

1. Any travel plan survey by questionnaire must produce a 30% return rate.
2. The travel plan surveys by questionnaire are to be undertaken on an annual basis.
3. The modal share targets must reach the 10% reduction in single occupancy car trips.
4. Bi-annual Manual Traffic Counts are to be undertaken ensuring car/LGV occupancies are recorded.
5. Review junction assessments without the 10% target reduction.

Planning Obligations

1. Travel Plan Bond

A Bond is required to mitigate any traffic impacts in the event that targets are not met.

The purpose of the Travel Plan Bond is to ensure that the targets within the Travel Plan towards sustainable travel (bus, walk, cycle etc.) can be met, and if not met the Council would step in with sustainable measures using the Bond. The Council needs to be assured that the Travel Plan is effective and has reasonable targets that can be met.

The formula for calculating the bond is as follows:-

No. of employees x the current cost of a 28-day SY Connect+ ticket (based on the prevailing cost at the time, currently £162.20) x 1.1.

Environmental Health

Having read chapter 12 Noise and Vibration of the Environmental Impact Assessment Scoping Report (EN0110032), given the many unknowns at this stage of the project, the defined study area is appropriate to provide meaningful measurements to inform current background levels of noise against which to set levels for construction/ traffic and operational noise and determine mitigation measures if necessary.

Figure 12.1 Illustrates the nearest noise sensitive premises and their use, the monitoring positions chosen, appear to be in suitable locations to provide representative data, but the local Environmental Health Officers will be in a better position than myself to determine that and they may be able to narrow down the number of monitoring points required to produce sufficient data for accuracy.

The intended monitoring methodology chosen is appropriate to provide robust baseline data, the embedded mitigation measures mentioned are as expected and tables 12.1 to 12.4 give reasonable noise levels to achieve throughout the project.

Our only query would be, is one 7-day monitoring period the best method, would it not be better to do shorter periods of 48 hours monitoring three times on week and weekend days and in different seasons, spring/summer/autumn for example? Incidences of poor weather resulting in unreliable or unusable data would be easier to account for as you would only have to replace one shorter monitoring period if necessary.

BS 7455-2 states at 5.4.3: Measurement time intervals shall be chosen so that all significant variations of noise emission and transmission are covered. Furthermore, the choice of the measurement time intervals shall be such that the long-term average sound level or rating level is determined with the desired accuracy.

I hope the above can be taken into consideration.

Kind Regards

[REDACTED]
Principal Planning Officer

City of Doncaster Council
Directorate of Place

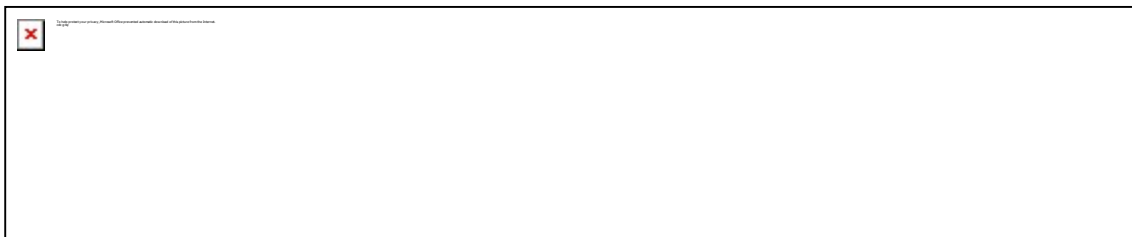
[REDACTED]
Address Floor 4, Civic Office, Waterdale, Doncaster, DN1 3BU
[REDACTED] [@doncaster.gov.uk](mailto:[REDACTED]@doncaster.gov.uk)
Website www.doncaster.gov.uk

Please note my normal working days are Monday, Tuesday, Thursday.

The Council have implemented a new practice for how we negotiate and accept amendments to all planning applications, which may affect you. We have also published a new series of Local Validation Requirements and would encourage you to familiarise yourself with these requirements, which will come into effect for all applications submitted on or after 01 October 2025.

More information about this can be found here:

[How do I apply for planning permission? - City of Doncaster Council](#)
[Pre-application advice - City of Doncaster Council](#)



Privacy Notice

The Council is committed to meeting its data protection obligations and handling your information securely. You should make sure you read and understand the Planning Services privacy notice, which sets out what you need to know about how Doncaster Council will use your information in the course of our work as a Local Planning Authority.

From: DIO-Safeguarding-Statutory (MULTIUSER) <DIO-Safeguarding-Statutory@mod.gov.uk>
Sent: 23 June 2026 07:18
To: Humberhead Solar
Subject: 20260623_0618Z-RE: EN0110032 Humberhead Solar project - EIA scoping notification

Good morning, [REDACTED],

Thank you for consulting the MOD on application reference EN0110032

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System.

I can confirm that, following review of the application documents, the proposed development falls outside of MOD safeguarded areas and does not affect other defence interests. The MOD, therefore, has no objection to the development proposed.

The MOD must emphasise that this email is provided specifically in response to the application documents and supporting information provided on the Planning Inspectorate website as of the date of this email.

Amendments to any element of the proposed development (including the location, dimensions, form, and/or finishing materials of any structure) may significantly alter how the development relates to MOD safeguarding requirements and may result in detrimental impact(s) on the operation or capability of defence sites or assets.

In the event that any revised plans, amended plans, additional information or further application(s) are submitted for approval, the MOD, as a statutory consultee, should be consulted and provided with adequate time to carry out assessments and provide a formal response whether the proposed amendments are considered material or not by the determining authority.

Kind Regards

Kind Regards
DIO Safeguarding Team
Defence Infrastructure Organisation | National Armaments Director Group
Estates | Safeguarding
Defence Infrastructure Organisation | St George's House | DMS Whittington | Lichfield | Staffordshire | WS14 9PY
Email: DIO-Safeguarding-Statutory@mod.gov.uk
Website: www.mod.uk/dio/

 **National Armaments Director Group**

County Hall, Beverley, East Riding Of Yorkshire, HU17 9BA Telephone 01482 393939
www.eastriding.gov.uk
Stephen Hunt Interim Executive Director of Prosperity and Place

Environmental Services Infrastructure Decisions and Applications Service Planning Inspectorate c/o QUADIENT 69 Buckingham Avenue Slough SL1 4PN	Your ref: EN0110032 Our ref: 26/01087/NSIP Enquiries: [REDACTED] E-mail: [REDACTED]@astriding.gov.uk Date: 24 June 2026
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Dear Sir/Madam

Proposed application by Humberhead Solar Limited (the Applicant) for an Order granting Development Consent for Humberhead Solar (the Proposed Development)

I am responding on behalf of East Riding of Yorkshire Council to your email communication of 27 May 2026 regarding the above. The Council have consulted the relevant internal consultees to request what information should be included within the Applicant's Environmental Statement (ES). Their comments are provided below.

Highways

Full comments to follow. However, the Highway Authority has been involved with several large environmental developments in recent years and it is important that the developer and their Transport Consultant continue dialogue with the Highway Authority so we can discuss and agree transport implications and any potential mitigation measures with them.

Public Protection

Air Quality

The Environmental Control Specialist has reviewed the Environmental Impact Assessment Scoping Report (dated May 2026, report ref: EN0110032), in specifically Section 14.1 Air Quality and is satisfied with the measures proposed by the applicant and look forward to reviewing the detailed submissions as the project progresses

Land Contamination

The Environmental Control Specialist has reviewed the Environmental Impact Assessment Scoping Report (dated May 2026, report ref: EN0110032), in particular Section 14.6 Ground Conditions and is satisfied with the measures proposed by the applicant and look forward to reviewing the detailed submissions as the project progresses.

Noise

The Environmental Control Officer has reviewed the Environmental Impact Assessment Scoping

Executive Director of Planning and Economic Regeneration

Report and understands that hours of construction for the proposed development are likely to be carried out during core working hours of Monday to Friday 07.00-18.00 and between 08.00-13.30 on Saturdays. Some activities may however be required outside core working hours, namely the delivery of abnormal loads, concrete pours for foundations, night-time working for cable construction works in public highways and HDD activities.

Threshold construction phase noise values at residential dwellings have been proposed based on BS 5228-1:2009 for daytime, Saturdays, evenings/weekends and night-time working. This team agrees with the methodology but would advise that existing background noise levels are likely to be very low and consideration should be given to lowering the proposed SOAEL.

In terms of the operational noise assessment criteria again it is advised that the existing background noise levels are likely to be very low and consideration should be given to lowering the LOAEL and the SOAEL if the noise from the development is predicted to exceed background noise levels by 5-10 dBA or more at residential dwellings.

Artificial Lighting

The Environmental Control Officer has reviewed the Environmental Impact Assessment Scoping Report and it is understood that the LVIA will consider lighting during the construction, operational and decommissioning of the scheme. It will also describe any landscape measures necessary to avoid or mitigate lighting effects.

It is also noted that construction lighting will be temporary in nature (approx. 24 months) and that during the operational phase of the development motion sensor security lighting will be provided within the onsite substations and within the BESS compound. Lighting is not required within the operational phase of the solar arrays.

All lighting required during operational phase is to be developed in accordance with a lighting strategy secured by the outline Operational Environmental Management Plan and all construction lighting is to be developed in accordance with a lighting strategy secured by the outline Construction Environmental Management Plan, both plans will be submitted with the DCO application. The lighting strategies are to be designed to minimise the potential for light spillage and glare particularly towards houses, traffic and ecological habitats.

Drainage

The Lead Local Flood Authority have advised that they welcome the inclusion of Water Environment as a key topic in the EIA and generally agree with the proposed scope of assessment. The site lies within Flood Zones 1, 2 and 3, the Flood Risk Assessment will need to address the required flood mitigation methods. There are areas of the sites which have a low, medium and high risk of surface water flooding.

The ES should comprehensively assess flood risk from all sources, including surface water, ordinary watercourses, groundwater, sewer flooding and artificial sources during the construction, operation and decommissioning phases. Particular attention should be given to the extensive low-lying agricultural landscape and existing drainage networks within the scheme area.

The proposed FRA should demonstrate that the development will not increase flood risk either on site or elsewhere and include cumulative effects in combination with other existing, consented and proposed developments. Appropriate climate change allowances should be incorporated throughout the assessment in accordance with the latest national guidance.

The LLFA support the proposed assessment of impacts on existing drainage systems, watercourses and Water Framework Directive objectives. The ES should fully evaluate potential effects associated with construction compounds, cable route installation, temporary access

tracks, soil compaction, changes to surface water run off rates and flow pathways, and crossings of ordinary watercourses.

The proposed drainage strategy should demonstrate the use of SuDS principles where practicable, provide details of attenuation and runoff management measures, and ensure existing drainage connectivity and maintenance access to watercourses and drainage assets are maintained throughout the lifetime of the development.

The LLFA welcomes the commitment to assess construction and operational impacts on the water environment and considers that the proposed scope provides an appropriate basis for detailed assessment.

Nature Conservation/Ecology and Trees

1) Do the consultees have any expectations on the level of evidence required at the ES stage to demonstrate connectivity with SPA/Ramsar sites, particularly where use by qualifying species is intermittent or below standard WeBS thresholds?

We defer to Natural England's position on this matter. The East Riding of Yorkshire Council are led by Natural England advice which details where species are particularly vulnerable due to declines in the population, then it may not be appropriate to rely on the 1% of the 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.

2) Do the consultees have any specific expectations on the treatment of widespread or non-designated bird assemblages (e.g. passerines), where embedded mitigation is proposed and significant effects are not anticipated?

We would expect to see consideration given to impacts on these species. There is currently uncertainty in relation to impacts on non-ground nesting birds and non-designated passage and wintering birds in the absence of a detailed scheme design. Notwithstanding the commitment to timings of vegetation clearance to avoid the nesting season and buffers around retained features the Scoping Report infers that hedgerows and trees may be removed to facilitate PV arrays and cable route corridors and large areas of arable farmland are expected to be lost; the latter disproportionately impacted farmland birds.

3) Can the consultees provide the expectations of the spatial extent and types of developments that should be included within cumulative ornithological assessments for solar NSIPs, particularly in areas with multiple proposed schemes?

We agree with the approach detailed in section 8.7.25 for the ornithology assessment to include an assessment of the cumulative effects from the interrelationship between different projects of up to 20 km based on foraging ranges of the species identified as important ornithological features.

The following types of projects should be included in the cumulative ornithological assessments

- i. Existing completed projects;
- ii. Approved but uncompleted projects;
- iii. Any ongoing activities;
- iv. Plans or projects where an application has been made and are under consideration
- v. Plans and projects which are sensibly foreseeable, this could include projects where an application has not been submitted but will likely progress before completion of the development; understanding that there must be sufficient information available to assess the likelihood of cumulative and/or in-combination effects.

4) Are the consultees aware of any expectation for detailed assessment of glint and glare effects on bird receptors, or is a qualitative assessment generally considered sufficient where evidence of significant effects is limited?

Recent experience indicates that a qualitative assessment has generally been considered sufficient for similar schemes in the East Riding of Yorkshire.

General Comments

The commitment to providing a number of outline management documents as part of the ES is noted and The Natural Environment Officer support the production of an outline Construction Environmental Management Plan, an outline Operational Environmental Management Plan, outline Decommissioning Environmental Management Plan, outline Drainage Strategy, outline Landscape and Ecological Management Plan and outline Soil Management Plan.

The 20km zone of influence for impacts on designated sites is welcomed and the commitment to providing a Shadow Habitats Regulations Assessment alongside the ES. Survey buffers for non-breeding bird surveys are appropriate. The Lower Derwent Valley (LDV) Ramsar, criterion 2 covers its rich assemblage of wetland invertebrates. Hydrological connectivity to the LDV sites is likely and an assessment on this species group should be included.

Also welcome the commitment to assess the scheme's impacts on protected species and habitats during all stages of the development. However, the extent of water vole surveys detailed in section 8.4.4 is a concern as 'the Scoping Site Boundary' and not 100m upstream and downstream as recommended in the Water Vole Mitigation Handbook (2016).

Several protected species are noted to be scoped out on the basis that the design of the development will aim to retain habitats; and precautionary measures will be secured in the construction, operation and decommissioning Environmental Management Plans. It is noted also that walk-over surveys of the cable route corridor scoping area are not complete and for some groups, the 'extent of presence within Scoping Site Boundary yet to be confirmed'. Whilst we are comfortable that operational effects may be ruled out, there is concern that in the absence of detailed information on the extent of habitats present and habitat loss, particularly for the cable route and unknown extent of hedgerow and tree removals for the PV array areas, it is premature to scope out these receptors at the construction and decommissioning phase presently. This limitation is acknowledged for roosting bats and trees in the Scoping Report which details 'impacts unclear until final design is known'.

We are satisfied that invasive species may be scoped out on the basis of the detailed embedded measures, to be secured through an Invasive Species Management Plan.

The scheme has potential to displace both breeding and non-breeding birds. The design and management of mitigation measures must ensure that compensation measures are appropriate to serve the needs of both groups.

We support early consideration for permeability through the landscape for small mammals. The design of the scheme should ensure movement for deer is considered in the wider landscape.

The East Riding of Yorkshire Council notes and supports the applicant's aspiration to deliver over 10% Biodiversity Net Gain and we encourage the applicant to maximise the ecological potential of the scheme to provide multifunctioning benefits for people, climate and nature. The embedded mitigation measures and adherence to the mitigation hierarchy is welcomed and any deviations must be fully justified and clearly demonstrated within the ES; with clear distinguishment between measures designed to avoid or reduce the potential for likely significant effects and enhancement measures. We welcome the commitment to producing an outline Biodiversity Gain Plan to accompany the Development Consent Order application.

Parts of the site lie within the Hull and East Yorkshire Local Nature Recovery Strategy's identified areas that could be particularly important for biodiversity the relevant measures should be appraised to assess how the scheme can contribute to the wider delivery of the strategy in these areas. Any chosen intervention should be appropriately justified.

The ES should assess the impacts of the proposal on any ancient, veteran and notable trees, and the scope to avoid and mitigate for adverse impacts. We note that surveys to identify veteran and ancient trees on and immediately adjacent to the Humberhead Sites have been prioritised and completed. Opportunities for enhancement should also be considered. Natural England and the Forestry Commission's standing advice should be referred to. The detailed commitment to avoiding impacts on mitigation by design will be applied to avoid impacts to trees where possible and particularly those trees of the greatest value is supported as is the development of an Arboricultural Impact Assessment to BS5837:2012 and Tree Protection Plan.

The East Riding of Yorkshire Council support avoiding loss of hedgerow and woodland and use of existing gaps in field boundaries and buffers. We would ask that where existing hedgerows are to be reinforced or new hedgerows are to be planted, these are species rich. Planting guidance for relevant Natural Character Area (NCA) is provided. Ash, where present in the mix, should be replaced by increasing the proportion of other species in the mix, or through substitution with other species identified as growing locally. We note that trees and hedgerows may be removed to create larger field parcels (Table 8-7). We would ask that there is consideration to achieve no net loss in length of hedgerows across the Order Limits. Tree species planted should be diverse and include a high proportion of longer-lived species.

Vale of York NCA

- Hawthorn *Crataegus monogyna* 30%
- Blackthorn *Prunus spinosa* 30%
- Hazel *Corylus avellana* 15%
- Field Maple *Acer campestre* 5%
- Alder *Alnus glutinosa* 5%
- Oak *Quercus spp.* 5%
- Grey Willow *Salix cinerea* 5%

Yorkshire Wolds

- Hawthorn *Crataegus monogyna* 30%
- Blackthorn *Prunus spinosa* 30%
- Hazel *Corylus avellana* 15%
- Field Maple *Acer campestre* 10%
- Dogwood *Cornus sanguinea* 5%
- Ash *Fraxinus excelsior* 5%
- Buckthorn *Rhamnus cathartica* 5%

Humberhead Levels

- Hawthorn *Crataegus monogyna* 30%
- Blackthorn *Prunus spinosa* 30%
- Hazel *Corylus avellana* 15%
- Field Maple *Acer campestre* 10%
- Alder *Alnus glutinosa* 5%
- Ash *Fraxinus excelsior* 5%
- Oak spp. *Quercus spp.* 5%

The risk from the Battery Energy Storage System (BESS) is fully assessed and we welcome the confirmation that an outline Battery Safety Management Plan will be provided alongside the ES. Appropriate opportunities to connect people should be explored, we would encourage links to

green networks and access to nature to be explored

Sustainable development

The Biodiversity Officer has reviewed the Environmental Impact Assessment Scoping Report and considers that because of its scale, the proposed development will inevitably have a range of environmental impacts, including those with direct or indirect consequences for biodiversity.

The provided scoping report identifies a range of features and characteristics and scoping those liable to be affected to a greater or lesser degree and the approach to be taken in assessing these.

Although the Scoping mapping does not incorporate the Hull and East Yorkshire Local Nature Recovery Network (HEY NRN) there is potential for the scheme to impact on the delivery of the HEY Local Nature Recovery Strategy, whether negatively or positively and we would encourage those responsible to actively incorporate this within the Environmental Impact Assessment.

Whilst this will be of relevance in relation to Strategic Significance for Biodiversity Net Gain, and helping reduce project costs, it would clearly be of considerable benefits to nature recovery aspirations for the habitat mitigation, enhancement and compensation to support HEY LNRS measures and HEY LNRS species.

We would be expecting to evaluate the EIA and the detailed NSIP proposals partly on the basis against which it contributes to or impacts on LNRS priorities as well as to the features that have been scoped in. It is likely that there will be similar expectation of other NSIP projects around the country.

Countryside Access and Public Rights of Way

Everingham Bridleway No.2 is subject to a proposed amendment, however, no orders have been made yet to amend this route but may be confirmed in the future. In addition to the Public Rights of Way (PROWs) detailed in the report, there are 9 PROWs claimed under Schedule 14 of the Wildlife and Countryside Act 1981 which may affect the site under the following reference numbers:

- S140178
- S140179
- S140171
- S140175
- S140096
- S140162
- S140186
- S140197
- S140196

The Council has received two unofficial Ramblers claims to add public rights of way which cross or abut the site. The Ramblers believe that they should have been placed on the first Definitive Map and Statement in the 1950s. Although they have not been made through official applications under Section 53(5) Schedule 14 of the Wildlife and Countryside Act 1981, they cannot be ignored and may be investigated in the future.

One provisional right of way is recorded which was registered by a parish council for inclusion of the first Definitive map on the 1950s but was objected to and the Council was instructed by the Government to publish the map excluding any routes that had not legally been resolved (several

hundred). At the present time, the Council is not conducting any research into this route however, should evidence be found in the future, the route may be added to the Definitive Map and Statement. It is marked on the attached plan.

Any temporary diversion of any PROWs during the construction phase must be notified well in advance to allow sufficient time for applications to be processed. The applicant should contact countryside.access@eastriding.gov.uk

A number PROWs cross or abut the sites and permanent diversion of any PROW will take a significant period of time for the application process to be completed. The applicant should contact definitive.map@eastriding.gov.uk

It is noted that an outline Public Rights of Way Management Plan (oPRoWMP) will be prepared and this should be submitted to the Council for consideration as soon as it becomes available.

Archaeology

The construction of the proposed solar scheme has the potential to impact on a wide range of significant archaeological remains from the prehistoric period onwards. The Cultural Heritage chapter of the Environmental Impact Assessment Scoping Report establishes the proposed scope of the assessment methodology, legislation, policies/guidance and the baseline conditions.

The archaeological baseline in the Environmental Impact Assessment Scoping Report is sufficient at this stage in providing a brief archaeological background to the non-designated heritage assets within the study area alongside a list of designated heritage assets. The Cultural Heritage chapter details the desk-based sources that will be utilised to prepare a desk-based assessment, which will then itself inform the Cultural Heritage chapter of the ES. The list of sources is acceptable, however, the only additional source of information we would like to see included, is data from the National Mapping Projects undertaken by Historic England.

As noted in paragraph 10.3.1, consultation has already been taking place between ourselves and the developer's archaeological representative. These consultations have resulted in an agreed scope for the archaeological assessment and as confirmed in paragraph 10.7.17, a geophysical survey work on the Humberhead Sites has already been completed. However, this survey did not include the Cable Route Corridor, with paragraph 10.7.18 stating that this work will take place at the post-DCO consent. Therefore, at this stage, there is a lack of geophysical survey results for the Cable Route Corridor and although we are happy to accept some post-DCO consent geophysical survey, we would recommend that targeted survey work is undertaken following the first draft design to further inform the DBA and ES. The results of this survey work would further inform the archaeological baseline whilst also enabling the results to be fed into the design process for the cable route corridor.

The specific details regarding the next stages of archaeological scheme will be discussed and agreed in meetings/correspondence between the East Yorkshire and Hull HER and the developer's archaeological representative. Specific pieces of the assessment and evaluation work will be supported by archaeological written scheme of investigation documents, which will be produced and approved prior to that work commencing.

Heritage Assets

The impact on Cultural Heritage is considered in Chapter 10 of the Scoping Report. Within this chapter the applicant has set out the proposed extent of the study area to be considered when producing the heritage chapter. This is to be 3km from the 'Humberhead Sites' and 1km from the Cable Route Corridor. Having considered the rationale for this radius, alongside the supporting figures 10-1 and 10-2, the Conservation Officer would agree that this would allow for an

appropriate detailed assessment. At this juncture there are no assets outside this radius that are considered necessary to also assess, but it is positive to note that para. 10.4.5 allows for an assessment of assets outside this scope where they are later identified by the EIA technical discipline team or statutory consultees.

The methodology to be utilised in the EIA to assess the effect of the development on heritage assets is one that is consistent with the methodology used for other similar large infrastructure projects. It is therefore agreed to be appropriate. However, it is highlighted that it is a methodology that has been developed to cover a wide range of potential projects. This makes it a high-level process, that can lack specificity to the development being assessed if applied without nuance. In particular, it is centred on a matrix of 'asset value' and 'magnitude of impact'. This matrix can result in generic and blanket conclusions about assets of the same designation, which do not reflect these assets' varying importance and character, if applied without nuanced discretion. It is therefore positive to note that para. 10.7.2 notes that each asset will be assessed on an individual basis, using professional judgement.

It is also noted that the effects of the decommissioning of the development on heritage assets are to be scoped out of the EIA. This is not objectionable in principle, as it is accepted that the impact of decommissioning often matches those of construction, and that it is unlikely to be greater than the effects caused at the construction and operation phases of the development. However, this conclusion assumes that the project's decommissioning phase will follow a similar process as other similar projects, and this assessment would need to be revised should this assumption prove to be incorrect.

The Conservation Officer would also highlight a number of assets where we believe that their assessment will need require particular attention as part of the heritage chapter of the EIA. These include the assets that sit within the boundary of the cable corridor, and we would recommend that detailed consideration is also given to how the impact on their setting can be minimised as part of the construction works. It is also recommended that consideration be given to setting out a strategy to ensure that physical impacts on these assets (both direct and indirect) are avoided. Given that most of these assets are also buildings and infrastructure connected with the canal network, contact with the Canals and Rivers Trust is recommended.

Particular concerns are raised by the proximity of both the cable corridor and areas of potential development land to Londesborough Registered Park and Garden. This is a highly significant designed landscape, which includes the (now curtailed) access route from York Road to the estate. Views along this avenue were planned, and they remain impressive where their original conception remains legible. Part of this character relates to how views along this avenue are read within a wider open agricultural landscape, and the Conservation Officer would therefore have considerable concerns with development which encroached on views along and around this avenue. As such, while the LPA would wait to understand the exact detailing of the proposals, and we will pay careful attention to the findings of the heritage assessment in the EIA, we would express an initial concern about this parcels being included as part of the development.

Landscape/Visual

Methodologies

A meeting with the development team's landscape architect was suggested in May 2026 but not carried through. We would welcome the opportunity to better understand the landscape and visual considerations of the project and the applicant's response to them.

A figure which pairs the ZTV (Fig 7-10) with ERYC LCAs (Fig 7-4) would be useful in reviewing the proposed Scope in relation to LCAs.

The LVIA, Cumulative, RVAA and ZTV methodologies appear to be appropriate, although we reserve judgment on, for example, the criteria for sensitivity and significance of effects, until we see how they are interpreted at the PEIR/LVIA stages.

We would expect consideration of secondary impacts on Landscape and Visual resources, for example from construction traffic, to be informed by the Traffic Assessment, not delegated to it.

It is slightly concerning to see statements within Table 16-1 Summary of ES Scope, such as “Visual receptors outside the 1 km Study Area that do not have direct, extensive and/or open views towards the Scheme are to be Scoped Out of the LVIA.” (p492). This probably makes sense, but rounded distances (1/2/5km) should not be the only factor. Elevation of viewpoints relative to the solar farm field is also a factor which should be taken into account, given hilly terrain around and within the site. This seems to be reflected in the qualifications such as “that do not have direct, extensive and/or open views”. This will be best resolved through discussion with the applicant’s landscape team.

Visualisation

We welcome the intention to provide “LI TGN 06/19 Type 4 photomontages to AVR Level 3 in both winter and summer months”. They should also illustrate the effects of proposed mitigation, where relevant. Where infrastructure would be partially hidden but nonetheless occupying a notable part of the view, photowire images (AVR level 0) may be appropriate.

Some panoramic photos in Appendix 7-B appear to be oddly squashed (too narrow left-to-right), which is most notable where a car is present in the scene (e.g. VPs 41/42/45) - possibly the images are too wide for the frame. Presumably the correct aspect ratio will be used in next-stage visualisations.

Photomontages/Photowires will be expected to cover the full extent of the development from any given view, using adjacent panoramas if necessary. The use of a 10cm scale bar, on the presentation sheet PDFs, is recommended to ensure appropriate scaling of the image when viewed on-screen.

Mapping and Viewpoints

The underlying mapping, for example of Figures 7-14, makes it difficult to interpret the location of items, in this case including viewpoints. Use of OS 1:50,000 raster imagery is recommended as the base for such mapping (in the scale range of 1:100,000~1:50,000). Where drawing scales are around 1:25,000, OS 1:25,000 raster imagery is the appropriate base mapping.

For example, the location of Church Hill, at Holme Upon Spalding Moor is clearly visible on Figure 3- 1-5, but not visible on Figure 7-14-4.

The selection of viewpoints appears to be comprehensive (as is appropriate for such a wide-ranging development). Ideally, a site walkover should be arranged between the developer and ERYC, to review the viewpoints.

Particular attention should be paid to elevated locations which have views over the plain, which may reveal extensive areas of the solar installation.

Mitigation

The scoping document proposes appropriate responses to the screening of the various infrastructure items through hedgerow and tree screening. Screen planting and the management of existing vegetation will need to be of sufficient height to be effective in screening infrastructure of up to 4.5m height (subject to confirmation); and greater heights around taller sub-station structures. However, where this leads to potential loss of views or openness, this should also be assessed as an effect within the PEIR/LVIA.

Enhancement

The development would have a notable effect upon the landscape of the study area. The applicant is recommended to seek positive outcomes beyond mitigating its effects, for example through: designation of footpaths (permissive and, where possible, permanent); and wider landscape enhancement, working with the (ERYC) Humber Forest and Local Nature Recovery Strategy Teams, to create a landscape which is ecologically and visually more resilient to the introduction of largescale energy infrastructure. Such approaches can take place beyond the DCO boundary through cooperation with appropriate agencies.

Agricultural/Soils

No comments at this stage. The Council would need to appoint external consultants to advise on these matters

The Council's Agricultural Consultants agree with scoping in matters of BMV land being scoped into the construction and decommissioning phase. It is agreed that there's no further impacts to BMV agricultural land during the operational phase.

Concrns are raised in the magnitude of change section at Table 14-8, pg 389. The ISEP guidance which they've quoted use of actually follow different parameters than set out in the scoping document.

Magnitude	Humber solar	ISEP guidance
Major/High	Permanent Loss of over 50ha	Permanent Loss of over 50ha
Moderate/Medium	Loss of 20 to 50ha	Loss of 5 to 20ha
Minor/Low	Loss of Less than 20ha	Loss of less than 5 ha
Negligible/Very Low	No loss	No Loss

Given the above, the issue with deviating from these guidelines is that the magnitude will be downplayed. Under ISEP guidance, a loss of, for example, 35ha would represent a Major magnitude, bit only a moderate magnitude under the Humber Solar's parameters.

However, it's important to note that due to the size of the site, this wouldn't materially change the outcome of the impact assessment for this site in isolation. As the preliminary ALC results, Table 14-5 of the scoping report, show that the distribution of grades 1, 2 or 3a covers a site area of more than 50ha.

Public Health

The Scoping Report provides a good foundation. The use of recognised scoping and significance frameworks, the WHO definition of health, the Health and Wellbeing Strategy, a structured determinants approach across all project phases, and an evidence-based health baseline with geographical comparators are all welcome. However, there are several improvements and mitigations that need to be considered for population health:

Mental health and wellbeing

Mental health appears in places but is not treated as something the assessment actively measures. Evidence from similar NSIP contexts shows that fear, mistrust, and disrupted sleep are common community responses to large infrastructure proposals, effects that can begin before any planning decision is made.

Recommendation: The ES should assess mental health and wellbeing as a discrete outcome across all project stages, including the pre-application period. This should draw on a structured framework covering core protective factors: enhancing community control over the project,

building resilience and community assets, and facilitating participation and inclusion.

An integrated health summary

Health material is currently distributed across Chapters 5, 7, 9, 11, 12, 13 and 14. There is no single account of what the combined effect on community health looks like. Communities, elected members and decision-makers should not have to navigate seven technical chapters to understand the overall picture.

Recommendation: The ES should include a clear, accessible integrated health summary drawing together findings from all relevant chapters, identifying who is most affected, by what, and for how long, and setting out key mitigation and residual effects in plain language.

Cumulative health burden from multiple NSIPs

Humberhead Solar sits alongside multiple other similar solar NSIPs, all progressing simultaneously in or adjacent to the same area. Repeated consultations and sustained uncertainty create a cumulative wellbeing burden that no individual project currently accounts for.

Recommendation: The cumulative health assessment in the ES should address the psychological and social burden of prolonged project uncertainty on communities, not just physical or environmental impacts. The applicant should set out how this burden will be actively reduced through coordinated engagement.

Health inequalities

The sensitivity criteria table references deprivation and reduced adaptive capacity as markers of high sensitivity, but the baseline does not show where these characteristics cluster within the study area. Overlapping vulnerabilities, older age, proximity to the cable route, long-term illness, produce qualitatively different experiences that a uniform assessment cannot capture.

Recommendation: The ES should map deprivation, vulnerability and health status at LSOA level, identify where overlapping disadvantage is concentrated, and explain how mitigation will be targeted at those most at risk rather than applied uniformly.

Engagement designed with health in mind

Engagement is addressed as a statutory process requirement but not as something that directly affects community wellbeing. For a project with a 60-year operational life, the foundation for the developer-community relationship is set during the pre-application period, and how engagement is conducted has real health consequences.

Recommendation: The ES should describe how engagement has been designed to reach more vulnerable groups, how communities have been clearly informed about what they can and cannot influence, and how feedback has shaped the scheme. Engagement should be treated as a continuous health-protective activity through construction, operation and decommissioning.

Impact on local health services

Workforce pressure on local GP and urgent care services is acknowledged but not developed. There is no estimate of non-home-based worker numbers, no baseline on local NHS capacity, and no evidence of engagement with health service providers. A construction period of up to 24 months is a significant and sustained demand pressure.

Recommendation: The ES should include a proportionate assessment of workforce demand against local primary and urgent care capacity, with early engagement with the East Riding ICB evidenced.

PRoW and access to green space as a health opportunity

Disruption to the Yorkshire Wolds Way and the wider PRoW network is framed purely as a harm

to manage. Given the study area's older age profile and the scheme's 1,595 ha footprint, including areas proposed solely for mitigation and enhancement, there is a clear opportunity to deliver net gain in access provision.

Recommendation: The ES should treat access to active travel routes and green space as a health opportunity. The outline PRow Management Plan should include specific proposals for permissive paths, route connections and amenity improvements. Any temporary diversions should be of equivalent or better quality, not simply the minimum required.

Wider benefits to the community

The report is largely focused on what might go wrong and how to reduce those impacts. There is no consideration of how a scheme of this scale and duration could actively benefit local communities, through community benefit funds, ecological access, education, or shared ownership, particularly in the communities most directly affected.

Recommendation: The ES should set out how the development will deliver positive health and social value outcomes throughout its operational life, beyond statutory mitigation. Community benefit mechanisms should be framed explicitly as health-protective and health-promoting measures.

Economic development

The Report provides a clear definition of the Proposed Development, detailing the expected geographical area it will cover, along with detailed information on the construction, operations and maintenance, and decommissioning elements of the project. All potentially significant socio-economic effects appear to have been identified in the relevant section.

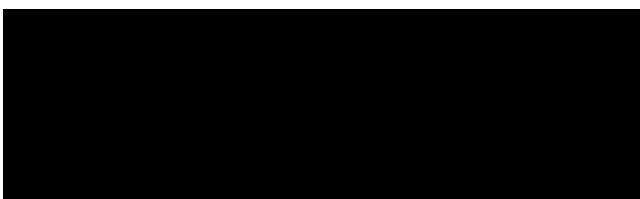
Consideration may wish to be given in the socio-economic topics section to the Humber Economic Strategy 2025 to 2035, which identifies clean energy and industrial decarbonisation as a regional opportunity, and the Hull and East Yorkshire Combined Authority Local Growth Plan, which identifies energy as one of the growth driving sectors within its first Big Play, powering our industrial future.

Other local data sources which may assist to characterise the baseline include, East Riding Intelligence Hub and East Riding Local Economic Assessment (LEA) Dashboard.

East Riding of Yorkshire Council's Supply Chain Network project can support all phases of the Proposed Development (<https://thesupplychainnetwork.co.uk/>). We ask that it be included in the Environmental Statement.

We would encourage The Applicant and their supply chains to engage fully with this resource, signing up to the 'Supply Chain Promise' (<https://thesupplychainnetwork.co.uk/promise/>) and using the 'Opportunity Map' (<https://thesupplychainnetwork.co.uk/opportunities/>) to promote specific opportunities to local businesses.

Yours faithfully



Interim Executive Director of Prosperity and Place



Planning Inspectorate

Email: humberheadsolar@planninginspectorate

.gov.uk

Our ref: OR-0004997/01

Your ref: EN0110032

Date: 22 June 2026

Dear Sir/ Madam

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

Proposed application by Humberhead Solar Limited (the applicant) for an Order granting Development Consent for Humberhead Solar (the proposed development) Scoping consultation

Thank you for consulting us on the above Scoping Consultation which was received on 27 May 2026.

The Environment Agency has reviewed the Humberhead Solar - *Environmental Impact Assessment Scoping Report for the above scheme, Dated: May 2026*.

We have the following comments to make regarding the proposed scope of the Environmental Statement (ES).

For the topics within our remit, we do not agree with the topics that have been scoped out. We further recommend inclusion of the following detailed advice that we have addressed in Appendix A in issue/impact/solution format.

There are currently topics proposed to be scoped out, which we consider should be scoped in which are addressed below:

- **Flood Risk**
- **Groundwater & Contaminated Land**
- **Water quality**
- **Climate Change mitigation and adaptation**

Mylen Leah Solar Farm

We would like to mention that Humberland Solar Farm and Mylen Leah Solar Farm boundaries overlap and may have cumulative impacts on the environment. Potential impacts on fish and water quality.

Final comments

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me on the details below.

Yours sincerely

[REDACTED]

Planning Specialist

[REDACTED]

Direct e-[REDACTED]@environment-agency.gov.uk

Appendix A – Detailed advice

Flood Risk & Hydraulic Modelling

Document Reference(s): Table 9-9 <i>Elements scoped in and out of the water environment assessment</i> (page 287, 289) and Table 16-1 <i>Summary of ES Scope</i> (page 505, 508)	
Issue	The applicant has scoped out flood risk from all sources for the construction and decommissioning phases.
Impact	Insufficient evidence to scope out flood risk means that flood risk may not be adequately managed by either the CEMP or DEMP.
Solution	Scope in flood risk from all sources for all phases.
Additional narrative/ explanation (if necessary)	

Document Reference(s): 4.4.22-4.4.24, 9.7.24, Table 9-4 <i>Flood Risk from all sources (Humberhead Sites)</i>	
Issue	Significant areas of the Humberhead Sites lie within Flood Zones 2 and 3, including areas almost entirely within Flood Zone 3.
Impact	Development may alter flood flow routes, reduce floodplain storage or increase flood risk elsewhere.
Solution	The applicant should assess impacts on floodplain storage and conveyance and identify mitigation measures where required.
Additional narrative/ explanation	
If compensatory flood storage is needed, a strategy should be agreed in consultation with the Environment Agency.	
The Flood Risk Assessment (FRA) should consider the interaction between fencing and flood flows and demonstrate that floodplain function is maintained.	

Document Reference(s): 4.5.3, 9.6.7, 9.6.8, 9.6.24	
Issue	Cable route and vehicular crossings of main rivers and ordinary watercourses may affect channel hydraulics and flood risk.
Impact	Poorly designed crossings could affect conveyance, maintenance access, and hydromorphology.
Solution	The applicant should assess the flood risk implications of proposed crossing type and methodologies identifying where trenchless techniques are proposed. The applicant should provide a Crossing Register.
Additional narrative/ explanation Culverting existing watercourses / drainage ditches should be avoided. We would prefer the installation of a clear-span bridge rather than a culvert. This is in line with the Environment Agency's anti-culverting policy. Where culverting for access is unavoidable, the Applicant should demonstrate that no reasonable alternatives exist and where necessary it will only be in place temporarily for the construction period.	

Document Reference(s): 4.4.34, 4.5.5, 5.6.2, 9.7.10	
Issue	Temporary construction compounds may be located within areas at risk of flooding.
Impact	Compounds in flood-prone areas may increase flood vulnerability and pollution risk during construction or decommissioning.
Solution	The applicant should consider compound locations and demonstrate how flood risk has been minimised through siting and design. The locations should be agreed in consultation with the Environment Agency.
Additional narrative/ explanation This includes HDD entry and exit pits. Compounds and storage should be located outside of Flood Zone 3 where possible and outside of Flood Zone 3b in all cases.	

Document Reference(s): N/A	
Issue	Flood risk from catchments less than 3km ² may not be represented by the Flood Map for Planning.
Impact	Flood risk associated with small catchments may be underestimated.
Solution	The applicant should assess catchments less than 3km ² within the study area and identify any unmapped flood risk in consultation with the Environment Agency.
Additional narrative/ explanation (if necessary)	

Document Reference(s): 4.6.1, 4.7.1	
Issue	The development has a long operational lifespan (approx. 60 years) extending into future climate scenarios.
Impact	Future flood risk may differ materially from present-day conditions.
Solution	The applicant should apply appropriate climate change allowances over the full design life inclusive of the decommissioning phase.
Additional narrative/ explanation	
The applicant should define the define life of the development for all phases and make a conservative assessment of flood risk.	

Document Reference(s): 9.6.24	
Issue	Sensitive infrastructure (e.g., BESS, substations) may be placed within areas at risk of flooding throughout the lifetime of the development.
Impact	Flooding could affect operational resilience and maintenance requirements.
Solution	The applicant should demonstrate how flood risk has informed the location and design of sensitive infrastructure and identify resilience measures.
Additional narrative/ explanation (if necessary)	
Sensitive equipment should be sequentially located. Where sensitive equipment is located within the design flood extent, a freeboard of 600mm is needed.	

The BESS and substation require at least 600mm freeboard to the finished floor level above the design flood.

Solar panels should be 600mm above the design flood level.

Sensitive equipment may include the following:

- Battery energy storage system (BESS).
- Substations (132 and 400kV).
- Solar panels (whether fixed or tracker).
- Sub-distribution Switch Rooms.
- Conversion Units.

Document Reference(s): Section 9.6.24 page 273

Issue	Access crossing freeboard and design flood levels
Impact	Flood risk could be increased if crossings are inappropriately designed
Solution	Please ensure the soffit levels of any temporary and permanent access crossings are above the design flood level with an appropriate allowance for freeboard

Additional narrative/ explanation (if necessary)

Any temporary or permanent crossings should be designed so they are raised 600mm above the design flood level. In the context of fluvial flood risk the design flood level for temporary crossings would be the 1% (1 in 100) annual exceedance probability (AEP) scenario water level. For crossings over tidal watercourses the 0.5% (1 in 200) AEP water level should be used. Where there is fluvial-tidal interaction the higher of either the fluvial or tidal design event should be considered. For permanent crossings a higher central allowance should be applied for climate change considering the lifetime of the development to determine the design flood level.

Careful consideration will need to be given to how the design flood level will be determined for any proposed crossings. Typically, this would be determined by undertaking hydraulic modelling or referring to existing detailed hydraulic modelling data (where available and suitable). Any proposed crossings should be designed such that they do not increase flood risk elsewhere

Document Reference(s): Section 9.8.3 page 285	
Issue	Hydraulic modelling scope and use of existing datasets
Impact	The assessment of flood risk may be inaccurate if appropriate methods are not used
Solution	Please consult the Environment Agency when developing hydraulic models to inform flood risk.
Additional narrative/ explanation (if necessary) This section notes that requirements for hydraulic modelling of watercourses will be discussed with the Environment Agency and/or the Lead Local Flood Authority. This is welcomed. The Environment Agency should be consulted on any hydraulic modelling which is developed to inform the Flood Risk Assessment. Where existing modelling data is used to inform the Flood Risk Assessment, please check any modelling data you use is in line with guidance on using modelling for Flood Risk Assessments available online at: Using modelling for flood risk assessments - GOV.UK.	

Document Reference(s): Section 9.5.24 Flood risk from all sources page 261	
Issue	The Functional Floodplain (Flood Zone 3b) is not defined
Impact	Development could be located in areas of high flood risk unnecessarily
Solution	The applicant should include mapping which shows the extent of the Functional Floodplain (Flood Zone 3b) within their Flood Risk Assessment. The applicant should be cognisant of the Flood Zones and associated Flood Risk Vulnerability classification. Infrastructure should be sited sequentially to avoid areas of the highest flood risk.
Additional narrative/ explanation (if necessary) 	

Water Quality

Document Reference(s): Scoping Report, Chapter 9 Water Environment, Table 9-9 Scoping Report, Appendix 1-A: Commitments Register Scoping Report, Appendix 9-A: WFD Screening, section A.4.19 and Table 7	
Issue	<u>Foul scoping</u> Foul drainage is proposed to be scoped out for construction and operation in Table 9-9. There is no mention of foul in the decommissioning phase in Table 9-9, nor in D26 of the Commitments Register. The foul strategy is inconsistent between Chapter 9 and Appendix 9-A.
Impact	Foul water could pose a risk to the water environment receptors during all phases and will deteriorate water quality unless it is managed and contained. According to section 9.5.30, the Study Area for the development lies within three Nitrate Vulnerable Zones so the site is especially at risk from excess of nutrients in the event of a leak.
Solution	Foul drainage should be scoped in for all phases until containment and disposal method is finalised. The Applicant should provide justification why it would not be possible to connect to a public sewer and explain final choice of using a sealed cesspit in the context of a foul water disposal hierarchy assessment.
Additional narrative/ explanation (if necessary) We understand from sections 9.6.14 and 9.6.22 that “foul wastewater generated on site would be stored in self-contained foul drainage system to a sealed cesspit or similar sealed system. These tanks would be emptied under contract with a registered recycling and waste management contractor.” However, this is contradictory to Appendix 9-A, section A.4.19, which says that options may include connecting to the nearest available public sewer or using a treatment system. Table 7 of Appendix 9-A identifies that there is the potential for spillages of foul wastewater from welfare facilities.	

Document Reference(s): Scoping Report, Chapter 9 Water Environment, Table 9-9	
Issue	<u>Drainage scoping</u> Outline Drainage Strategy is scoped in for operation, but it is unclear how drainage will be managed for construction and decommissioning.
Impact	Surface water and drainage must be managed during all phases of the development, otherwise contaminants could get into surface water runoff and reach water environment receptors and make water quality worse.
Solution	Surface water runoff/Drainage should be scoped in for construction and decommissioning.
Additional narrative/ explanation (if necessary)	

Document Reference(s): Scoping Report, Chapter 4 Scheme Description, Sections 4.4.17 and 4.4.20, Chapter 9 Water Environment, sections 9.6.20 and 9.6.24, Chapter 14 Other Environmental Matters, Tables 14-31 and 14-32	
Issue	<u>Fire risk scoping</u> Fire risk is not clearly scoped into the water environment. Table 14-32 scopes out Fires/ Pollution incident to Aquatic Receptors under the premise described in Table 14-31 that they will be considered in the oBSMP and Chapter 9 of the ES. However, an oBSMP has not yet been prepared, so any mitigation measures have not been able to be reviewed.
Impact	Firewater (from fire suppression or contaminated surface runoff) from the BESS and Substation could pose an unacceptable risk to water environment receptors during operation and will deteriorate water quality unless managed and contained.
Solution	The Applicant should specifically scope in the risk from firewater from BESS and Substations to the Water Environment (surface and groundwater). The oBSMP should include sealed drainage with an automatically closing penstock valve to isolate any contaminated water. Additionally, the Applicant should confirm that “lined basins” means impermeable.

	Due to the risk of chemicals in contaminated firewater, it would be preferred for the developer to consider tankering firewater offsite, rather than treating and discharging. If discharge at the site is required, the Applicant should consider any potential impacts of this discharge and confirm that a water discharge activity permit will be sought from the Environment Agency.
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Additional narrative/ explanation:

During the operation phase section 9.6.20 identifies that there is a potential for impact on surface or groundwater from firewater runoff in the unlikely event of a fire in the battery storage areas or substations.

Table 14-31 says that an impermeable firewater containment system will be designed so that firewater can be captured and either treated prior to release or tankered offsite for disposal, but this is just stated in relation to the BESS, not any Substations. Potentially contaminated firewater runoff from Substations should be similarly managed.

We note that section 4.4.20 says that the BESS will be constructed in accordance with the appropriate fire safety standards and will include water storage and associated fire suppression systems. The volumes of water storage are unknown at this stage and will need to be included in the ES and oBSMP.

Section 4.4.17 and D38 of Commitments Register suggest that BESS and Substation(s) foundations may use compacted gravel or lined gravel filled filter trenches. It is unclear how this will affect the drainage in the event of a fire or pollution incident. The oBSMP should confirm how gravel will be removed or cleaned, if needed, to prevent re-mobilisation of any contaminants.

Section 4.6.2 says that no on-site staff will be there on a day-to-day basis, therefore any penstock valve to isolate contaminated drainage water must operate automatically. However, there should still be the option of a manual override. We support personnel visiting the Site to check the apparatus, penstock valve will require maintenance to ensure that it remains functional.

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Document Reference(s): Scoping Report, Appendix 9-A: WFD Screening, Table 5

Issue	WFD Scoping Table 5 summarises the screening of the scheme's activities against WFD water bodies. However, some activities are scoped out, despite a lack of detail provided.
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	- Solar Arrays scoped out despite lack of details provided about the cleaning of them and any PFAS risk. - Conversion Units and Sub distribution Switch Rooms, and Substations, all scoped out, however an oCEMP has not been reviewed so it is unknown if mitigation measures are sufficient. There is also no mention of fire risk associated with Substations, despite BESS being scoped in.
Impact	The above activities could introduce a pathway for pollution into the water environment receptors during construction and operation. If they are not scoped into the WFD Assessment, then the risks will not be appropriately assessed.
Solution	The Applicant should scope in all these activities to the WFD Assessment because they could all have a negative impact on water quality.
Additional narrative/ explanation (if necessary)	

Document Reference(s): Scoping Report, Chapter 9 Water Environment, Table 9-6	
Issue	<u>Receptor importance</u> Table 9-6 is about criteria to determine receptor importance, but we disagree with the methodology about watercourses which do not have a WFD classification being classed as a medium or low receptor.
Impact	If watercourses are not given a high enough receptor importance, then mitigation measures to provide protection may be inadequate. Impacts on smaller watercourses can still be non-compliance to WFD and protection should be secured.
Solution	We believe the Applicant should increase the receptor importance to High where watercourses are tributaries of WFD classified watercourses and there could be downstream effects.
Additional narrative/ explanation (if necessary)	

Document Reference(s): Scoping Report, Chapter 9 Water Environment, section 9.7.7	
Issue	<u>Water quality monitoring</u> There is no mention of a water quality monitoring plan in Chapter 9.
Impact	If water quality monitoring is not appropriate then a suitable baseline of water quality data may not be captured, and any trends in water quality deterioration or improvement as a result of the project may not be understood.
Solution	A water quality monitoring plan should be provided when the Environmental Statement is produced. It should have a pre-construction, during construction and post-construction phase. The frequency should occur at least monthly and the locations should be upstream and downstream of any water crossings or discharges. The Applicant should confirm how they intend to secure this existing monitoring commitment i.e. through the CEMP.

Construction

Document Reference(s): Scoping Report, Chapter 4 Scheme Description, Table 4-1	
Scoping Report, Chapter 9 Water Environment, sections 9.6.4 and 9.6.19	
Issue	<u>Concrete mitigation</u> Infrastructure will be using concrete feet, slabs or bases, but concrete mitigation is unknown. Sections 9.6.4 or 9.6.19, nor the commitments register, do not mention concrete management.
Impact	There is a risk of deteriorating water quality if hazardous substances during construction get into surface runoff and is subsequently discharged. Leachate from concrete can carry chemicals, including heavy metals, and affect the pH.
Solution	The Applicant should ensure the CEMP includes following concrete mitigation: - Concrete/cement works should be minimised during heavy precipitation events and carried out during dry months. - When concrete is curing, covering should be used where possible, and pre-cast units could be used where possible.

	- Concrete washout facilities must be on impermeable lining, and water must be collected and not allowed to be discharged to surface waters.
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Document Reference(s): Scoping Report, Chapter 4 Scheme Description, section 4.5.5

Scoping Report, Chapter 9 Water Environment, sections 9.6.4. and 9.6.7

Scoping Report, Appendix 1-A: Commitments Register

Issue	<u>Construction Risks and Mitigation</u> The risks and mitigation measures associated with construction are not adequately identified. - Section 9.6.4 does not explicitly identify risks from wheel washing. - Section 9.6.9 does not recognise that dewatering can also have an impact on surface water. - D17 and D28 in the Commitments Register does not state specific measures to avoid pollution or sediment transfer, or construction debris from entering any surface water drainage or water feature. - Section 9.6.19 and D27 in the Commitments Register does say that fuel will be stored in self-bunded leak proof containers, however there is no inclusion of oil or chemicals.
Impact	There is a risk to deteriorating water quality if hazardous substances during construction get into surface runoff and is subsequently discharged.
Solution	The CEMP should include mitigation measures against potential impacts from wheel washing, dewatering and any spills of hazardous substances.

Additional narrative/ explanation:

An outline Construction Environmental Management Plan (oCEMP) should include:

- Wheel washing facilities must be on impermeable ground and able to contain all water to prevent it contaminating surface water runoff. The Applicant needs to confirm how it will be safely disposed.
- Fuel, oil and chemicals should be stored on impermeable ground, with bunding of a suitably sized volume, and should be covered to prevent rainfall ingress.
- Refuelling to only take place on impermeable surfaces, and in bunded areas
- Where vehicles of personnel, and construction equipment, is stored in the parking area, drip trays and oil separators should be used.

Document Reference(s): Scoping Report, Chapter 4 Scheme Description, sections 4.4.11, 4.4.13, 4.4.14, 4.4.19 and 4.4.36 Scoping Report, Appendix 9-A: WFD Screening	
Issue	<u>Bunding</u> There will be transformers, and other electrical equipment, associated with the conversion units, the 400 kV and 132kV Substation(s), and the BESS, however bunding is unclear. Diesel generators are also proposed.
Impact	Without bunding, transformers and generators could leak or spill, and hydrocarbons could all pose an unacceptable risk to the water environment receptors.
Solution	All transformers and generators should be banded for all phases of development. They will need to be suitable sized to contain 110% of the volume. Where they are exposed to rainwater, the Applicant must have a mechanism to remove accumulated rainwater regularly.
Additional narrative/ explanation: We note that Table 5 of Appendix 9-A includes transformer bunding , which we support, but this should be embedded into Chapter 9 and Commitments Register too.	

Document Reference(s): Scoping Report, Chapter 4 Scheme Description, section 4.4.29 Scoping Report, Chapter 9 Water Environment, section 9.6.7	
Issue	<u>HDD</u> We note that Horizontal Directional Drilling (HDD) may be used to cross beneath watercourses or existing buried utilities. However, the risk from breakout is not scoped in as a specific risk to water quality. There is no commitment to a drilling fluid breakout plan, or sufficient buffer distances for entry and exit pits.
Impact	Drilling fluids can reduce water quality if there is a breakout and it reaches surface waters. Bentonite pellets which are used to make drilling fluid for horizontal directional drilling can also be coated in PFAS.

Solution	The Applicant should commit to producing a drilling fluid breakout plan. Entry and exit pits must be at least 10m away from top of bank of watercourses.
Additional narrative/ explanation (if necessary) Due to the risks both from pollution and disruption of sub surface flows in shallow groundwater and to surface controlled water a Hydrogeological Risk Assessment, Drilling Fluid Breakout Plan and water feature survey should be conducted for areas of the development where HDD is proposed to be used.	

Document Reference(s): Scoping Report, Chapter 14 Other Environmental Matters, section 14.7.28, and Tables 14-29 and 14-30	
Issue	<u>Surface water missing from Major Accidents and Disasters</u> Table 14-29 Construction Major Accidents and Disasters and Table 14-30 Decommissioning Major Accidents and Disasters identifies ‘Pollution incident to Ground Receptors’ as a Major Accident or Disaster but the equivalent to risk to Surface Water Receptors is not identified.
Impact	The increase in the risk of leaks and spillages of hazardous materials associated with the construction and decommissioning activities could increase surface water quality too.
Solution	Applicant needs to explain why a Pollution incident to Surface Water Receptors is not acknowledged as a Major Accident or Disaster.

Document Reference(s): Scoping Report, Appendix 1-A: Commitments Register	
Issue	<u>Watercourse buffers</u> D31 includes a buffer of at least 10 m measured from the top of bank or water’s edge; however, this is not included for Decommissioning Phase.
Impact	Without suitable watercourse buffers, sediment and other contaminants can more easily enter watercourses and reduce water quality.
Solution	D31 should be updated to include all phases of the development.

Drainage

Document Reference(s): Scoping Report, Chapter 4 Scheme Description, sections 4.5.3 and 4.5.4	
Issue	<u>Chronology of installations</u> Chronologies of site preparation and construction are unknown, and establishment of site drainage is not clearly stated in site preparation.
Impact	Without installing relevant impermeable lining, SuDS and shutoff valves prior to constructing the BESS or Substations, there is a risk that in the event of a fire or pollution event any contaminated water will not be adequately isolated.
Solution	The Applicant should commit to installing suitable drainage prior to other installations.

Document Reference(s): Scoping Report, Chapter 2 Methodology, section 2.4.4 Scoping Report, Chapter 4 Scheme Description, section 4.4.40 Scoping Report, Chapter 9 Water Environment, section 9.7.17 Scoping Report, Appendix 1-A: Commitments Register	
Issue	<u>Drainage management plan</u> We note that there is no drainage strategy or surface water management plan listed as a plan to be submitted as part of the DCO to secure mitigation measures. D34 in the Commitments Register suggests using SuDS to manage the pollution risk to the receiving water environment, but it is not included for the Decommissioning phase.
Impact	The surface water management strategy must be suitably designed to manage the risks from sediment, hydrocarbons, and other hazardous substances which could decrease water quality if these contaminants reach receiving surface watercourses. If SuDS are unmaintained debris and/or sediment could accumulate and prevent them from effectively managing drainage.
Solution	We understand from section 9.7.17 that there will be an Outline Surface Water Drainage Strategy (oSWDS) prepared as a technical appendix to the

	Water Environment chapter of the ES. However, if this is going to be used to secure drainage features and SuDS it should be appended to the OCEMP. The Applicant must commit to producing a SuDS maintenance schedule, based on the CIRIA SuDS Manual, and D34 should be updated to apply SuDS for all development phases.
Additional narrative/ explanation: Section 4.4.40 says that a ditch or a swale may be located downhill of the internal access track to control any potential for surface water run-off. However, further details of surface water management and types of SuDS are unknown.	

Document Reference(s): Scoping Report, Chapter 9 Water Environment, section 9.6.19 Scoping Report, Chapter 14 Other Environmental Matters, Table 14-31	
Issue	<u>Permit application</u> We note that section 9.6.19 says that there will be an appropriate temporary drainage system prior to discharge from the site to a watercourse, however it does not acknowledge that a permit application may be required. Table 14-31 also says that BESS firewater can be captured and either treated prior to release or tankered offsite for disposal, but there is no mention of a permit.
Impact	Water Discharge Activity permit applications are required so that discharges which may negatively impact water quality are fully assessed.
Solution	The Applicant should be clear they understand a permit may be required, and see this link for further guidance: Discharges to surface water and groundwater: environmental permits - GOV.UK It can take 4 months if you are applying for a new permit so the Applicant should factor this into their planning.

Operation

Document Reference(s): Scoping Report, Chapter 4 Scheme Description, Table 4-1 and 4.6.4	
Issue	<u>Solar panels</u> The solar panels are proposed to be Bifacial monocrystalline panels, but there is an unknown risk from PFAS and the cleaning regime is unclear. Where solar panels may be replaced once during the development lifetime, the Applicant must have a clear plan to ensure there is no risk to water quality.
Impact	PFAS are ‘forever chemicals’ that will negatively affect water quality.
Solution	Check with manufacturers if the materials used in panels or bentonite pellets contain PFAS. If the manufacturers are unknown, the Applicant should commit to using PFAS-free materials. The Applicant should also determine what liquid regular panel washing will use, and if there is any pathway between the panels and water receptors if any chemicals in the coating or cleaning products are used.
Additional narrative/ explanation:	
<u>PFAS [Solar Farms]</u> We strongly recommend that all solar panels are free from Per- and polyfluoroalkyl substances (PFAS). Some solar panels are treated with a PFAS coating. If panels containing PFAS are used, we suggest that there is consideration of this in the Operational Environmental Management Plan (OEMP) and Decommissioning Environmental Management Plan (DEMP). For example, if PFAS coating is damaged there is a risk of persistent chemicals entering the natural environment during heavy rainfall, washing, maintenance, and removal. The OEMP should also incorporate measures to minimise the risk of panel coatings becoming damaged via ‘thermal shock’ such as if cleaned whilst at a high temperature due to prolonged exposure to sunlight. The applicant should where possible avoid the use of PFAS-containing products in buried cabling. The applicant should ensure that any bentonite used for trenchless drilling, or elsewhere in the scheme, has not been treated with chemicals containing PFAS. Fuel, oils and other chemicals, such as cleaning agents and decontaminants, should be PFAS-free wherever possible.	

Document Reference(s): Scoping Report, Chapter 4 Scheme Description, section 4.6.4	
Issue	<u>Replacement of batteries</u> Where batteries may be replaced up to four times during the development lifetime, the Applicant must have a clear plan to ensure there is no risk from damaged or end of life batteries. Table 14-31 says that ‘The replacement works will follow much the same activities as to be undertaken during the construction phase and will introduce similar hazards as reported in Table 14-29’, however Table 14-29 only recognises a risk from ‘Pollution incident to Ground Receptors’. It does not identify a risk to Surface Water receptors.
Impact	Chemicals from batteries could leak if they are damaged/faulty which pose an unacceptable risk to the water environment receptors.
Solution	Applicant should clearly outline how battery replacements will be managed if batteries are damaged or reach end of life to protect surface waters.
Additional narrative/ explanation: We note Table 14-31 says that Batteries will automatically shut down if a problem / fault is detected.	

Document Reference(s): Scoping Report, Chapter 9 Water Environment, section 9.6.19	
Scoping Report, Appendix 1-A: Commitments Register	
Issue	<u>ERP</u> We understand the Contractor would produce an Emergency Response Plan, however we request that the Environment Agency is named.
Impact	ERP are important for managing high risk situations quickly and effectively.
Solution	We request that the Applicant develops this ERP in consultation with the relevant local authority planning officer, emergency services including the local fire service, and the Environment Agency in relation to responding to flood warnings and events. We recommend section 9.6.19 and D30 of Commitments Register is updated.

Additional narrative/ explanation:

The ERP should identify the importance of notifying any downstream river/groundwater abstractors in the event of a fire should impacts to surface water and/or groundwater occur, to ensure that Environment Agency incident response personnel are made aware of this as a priority.

Guidance and WFD Assessment

Document Reference(s): Scoping Report, Chapter 9 Water Environment, Table 9-3

Issue	<u>Dissolved oxygen</u> Table 9-3 summarises water quality data. It identified Poor status dissolved oxygen in Seller Dike downstream Foggathorpe STW (near Humberhead 3) and RSN1128 River Foulness at Sandholme (near Humberhead 4), as well as Bad status dissolved oxygen in Bishopsoil Drain at Cheapsides (near Humberhead 4).
Impact	Dissolved oxygen is an essential parameter in water quality and can have significant ecological consequences when it is low.
Solution	The Applicant must do further assessment into what is causing this low dissolved oxygen to ensure that they can be confident any activities on Site will not exacerbate the situation.

Document Reference(s): Scoping Report, Chapter 9 Water Environment, Table 9-3, and sections 9.5.26 and 9.7.7

Issue	<u>Turbidity</u> Table 9-3 summarises Available water quality data within, and immediately outside of the Study Area, however there is no turbidity comments. This is particularly relevant as according to section 9.5.26, the area between Humberhead 1 and 2, and between Humberhead 1 and 4 was identified at risk from turbidity. We disagree with the statement that no water quality sampling is proposed to support the water environment assessment.
Impact	The Water Framework Directive (WFD) does not specify a specific limit for freshwater turbidity. However, it emphasizes the importance of monitoring and assessing water quality to ensure that freshwater bodies remain in

	good condition. High turbidity levels can indicate poor water quality and may have negative impacts on aquatic ecosystems.
Solution	If turbidity data is not available from alternative sources, the Applicant should do further assessment of turbidity to support baseline data of water quality.

Document Reference(s): Scoping Report, Chapter 9 Water Environment, section 9.2.8 and 9.6.5

Issue	<u>Water Environment Guidance</u> The guidance section is missing relevant information.
Impact	If all relevant guidance is not used, assessment about the water environment may not be based on complete information.
Solution	The Applicant should use the following guidance and best practice documents for mitigation to the water environment: - CIRIA SuDS Manual (C753) - CIRIA Containment Systems for the Prevention of Pollution (C736) - Oil storage regulations for businesses - GOV.UK - Pollution prevention for businesses - GOV.UK

Document Reference(s): Scoping Report, Appendix 9-A: WFD Screening
Scoping Report, Chapter 9 Water Environment, Table 9-2

Issue	<u>WFD Guidance</u> The guidance section A.4.2 and the References section is missing relevant information. Although water quality data was referred to in Chapter 9, it is not included in the WFD Screening.
Impact	If all relevant guidance is not used, WFD assessment may not be based on complete information.
Solution	The Applicant should use these guidance links to support the WFD Assessment: 1. This guidance summarises the requirements of The Water Environment Regulations 2017 in relation to Nationally Significant

	Infrastructure Projects: Nationally Significant Infrastructure Projects: Advice on the Water Framework Directive - GOV.UK 2. This advice is not limited to estuarine and coastal waters in England, the guidance sets out general principles and a staged approach to assessment that the can be used for other water bodies such as rivers, lakes and groundwater: Water Framework Directive assessment: estuarine and coastal waters - GOV.UK 3. We recommend the Applicant uses the Water Quality Explorer for available data for the baseline: Map Explorer Water Quality Explorer (We note this was already used for Chapter 9, but should be referred to in WFD Assessment too).
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Additional narrative/ explanation:

Table 9-2 summarised the WFD Classification (2022 data) for WFD Surface Water Bodies underlying the Study Area. The Applicant should be aware that the next comprehensive update of classifications in all water bodies, as required in the WFD Regulations, is the 2025 classifications. Draft 2025 classification results have been finalised and can now be shared externally with stakeholders on demand via FOI request. We would suggest reviewing these classifications once released to ensure appropriate mitigation measures are in place during the construction phase of the project.

Document Reference(s): Scoping Report, Chapter 9 Water Environment, Table 9-2 Scoping Report, Appendix 9-A: WFD Screening, Table 2	
Issue	<u>WFD Terminology</u> Table 9-2: WFD Classification (2022 data) for WFD Surface Water Bodies and Table 2 WFD Classification (2022 data) for WFD River Water Bodies underlying the Study Area uses “Supports Good” in the Hydrologic al Regime status.
Impact	A recent change to the status of Hydromorphological Supporting elements has been made. This is due to the phrase “Supports Good” implying that no enhancement works need to be undertaken to improve the hydromorphology of a watercourse. New terminology is “not high”, which indicates that work may need to be undertaken to enhance hydromorphology in order to increase the WFD status of the waterbody.

Solution	Change the description in both Tables from “Supports Good” to “Not High” and possibly add an explanation.
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Recommendations

Document Reference(s): Scoping Report, Chapter 9 Water Environment, sections 9.6.5, 9.6.18 and 9.6.24

Scoping Report, Appendix 1-A: Commitments Register

Additional narrative/ explanation: Draft DCO Requirements

Where an outline Construction Environmental Management Plan (‘oCEMP’), an outline Operation Environmental Management Plan (‘oOEMP’), and an outline Decommissioning Environmental Management Plan (‘oDEMP’), as well as an outline Battery Safety Management Plan (‘oBSMP’) are being prepared as part of the DCO application, we request that the Environment Agency is named as a consultee in the draft DCO. This related to G1-G3 and G6 in the Commitments Register.

Document Reference(s): Scoping Report, Chapter 9 Water Environment, Table 9-9

Additional narrative/ explanation: Rationale in Table 9-9

Table 9-9 summarises the elements scoped in and out of the water environment assessment. We agree that Surface water features for water quality and hydromorphology are scoped in for all phases. However, for Operation and Decommissioning the Rationale still only lists the oCEMP. The Applicant should update this Table to reflect that the OBSMP, OOEMP and ODEMP are management measures too.

Groundwater & Contaminated Land

Document & chapter: Environmental Impact Assessment Scoping Report, Chapter 9, 6.21 Table 9-9

Issue	Heat as a pollutant has not received proper assessment.
Impact	Risks to Groundwater and groundwater dependent receptors has not and will not be assessed.
Solution	Heat should be scoped in.

Additional dialogue / commentary:

The Report contradicts itself as 6.21 states a lack of shallow ground water as a justification for heat relating to buried cables. Shallow groundwater was noted in Chapter 9 section 5.51,5.52 and 5.53.

Heat as a groundwater pollutant was introduced in 2023 via the [Environmental Permitting \(England and Wales\) \(Amendment\) \(England\) Regulations 2023 SI No.2023/651](#):

““pollutant”, in relation to England, means any—

- a. substance,
- b. heat, or
- c. biological entity or micro-organism,

which is liable to cause pollution;”

We are mindful that work is being carried out in this area in relation to heating of groundwater from ground source heating and cooling systems but there is currently no guidance relating to the potential thermal implications of high voltage buried electricity cables.

The Environment Agency’s Chief Scientist’s Group has published a report for Ground Source Heating and Cooling (GSHC) systems ([Environmental Impacts of Temperature Changes from Ground Source Heating and Cooling Systems](#)). In this study, a ‘thermal plume’ was defined as the region around a GSHC system that experiences a 1 degree C temperature change or greater. While the study is not directly applicable to thermal emission from underground cables, an equivalent benchmark could be considered when assessing heat pollution from underground HV cables.

The Chief Scientist’s Group states that the environmental factors with the greatest influence on thermal plume development include groundwater flow and bulk thermal

conductivity. It identifies that impacts may occur by direct (temperature change) and indirect (e.g. changes in water chemistry) means.

At this stage we require the potential thermal implications of buried cables, in relation to risks to groundwater, to be considered further via desk-based assessment. This should also include risks relating to damage and release of contaminants from peat as it is included in the screening area.

Document Reference(s): Environmental Impact Assessment Scoping Report Chapter 14, Table 14-9

Issue	Sensitivity receptor uses inaccurate deep levels and doesn't represent lowland peat sensitivity at the correct depth levels. Peat depth is used to identify deep peat soils of 1m, which is not correct.
Impact	Incorrect assessment of impact on peat and carbon emissions
Solution	Peat soils of 30cm or more depth must be included as high sensitivity/receptor value. Shallow peat is less than 30cm in depth, the medium sensitivity/receptor value should reflect this.

Additional Comments:

This is critical to evaluating and modelling potential impacts on the peat, both for the Environment Agency and the applicant.

Document Reference(s): Environmental Impact Assessment Scoping Report Chapter 14 and Chapter 9

Issue	No consideration of buried peat, peat hydrology and related sub-surface flows or the impacts upon the peat soils and the SSSI and dependent ecosystems.
Impact	Inaccurate assessment of impacts on receptors.
Solution	Undertake a peat survey with a method appropriate for lowland peat. Also assess and design around expected buried peat that may be present. Undertake a hydrological assessment to understand how water moves through the peat soils (surface and buried), and how the hydrology links to the surrounding land including the SSSI and wetland dependant habitats.

Additional Comments:

Until hydrological links are understood wetland and water dependant habitats and designated sites should not be scoped out.

No reference has been made to buried peat.

Assessment should cover both the above ground works and cable corridors.

The applicant should supply peat soil hydrology in assessment and undertake a study to understand the peat soil hydrology. The hydrological links between the project area, surrounding land and SSSI and habitats also need to be assessed. This should include any changes to how water moves through the peat soils, i.e. will the project change the water supply through surface or groundwater and including sub-surface movement of water through peat soils?

Document Reference(s): Environmental Impact Assessment Scoping Report Chapter 9 Table 9-9 and Chapter 14

Issue	Water supply has been scoped out however peat soils under solar should be re-wet.
Impact	Lack of peat survey to know extent of peat and no information on raising water tables under the solar site. Continued high release of carbon from the dry peat soils, including under grassland. There may be a lack of water to re-wet peat soils.
Solution	Undertake a feasibility study to identify what water management changes and water is required to enable peat soil re-wetting under the solar site. Include conclusions in site design.

Additional Comments:

With no peat survey, it is unclear how much water could potentially be required to re-wet peat disturbed by the development, therefore it cannot be scoped out at this stage.

Government's Clean Power 2030 Action plan (2025) sets out how solar farms can be delivered sustainable through projects such as rewetting lowland peat soils beneath the solar panels.

Document Reference(s): Environmental Impact Assessment Scoping Report, Chapter 4, 5 to 7

Issue	Installation of Ducting and Joint Bays for cabling
Impact	Introduction of preferential pathways for pollutants at all stages

Solution	Include these as pathways in future assessments
Additional narrative/ explanation (if necessary) Preferential pathways can allow for the rapid and less predictable spread of any pollutants that reach them. This can lead to higher risk of receptors at greater distances being affected, or of pollutants reaching receptors faster than would be expected. As such we believe all preferential pathways identified should be included in any assessments of risk and hazard. Design phase should assess methods such as Clay Stanks, other barriers, or methods to limit the migration of potential contaminants. The practicality of future removal of these assets at demolition and decommissioning should be included at the design phase. The DEMP should include methodology and planning for deciding what assets should remain in-situ or be removed based on guidance that has been issued in the intervening years from the approval of the DEMP.	
Document & chapter: Environmental Impact Assessment Scoping Report, Chapter 9, 4	
Issue	WFD Groundwater Bodies not referenced here
Impact	Reports are inconsistent and impacts may be missed
Solution	Include WFD groundwater bodies in relevant sections
Additional dialogue / commentary: We note they are referenced in other later sections but feel they should be included as relevant here as well to ensure they are ed with the relevant risks.	

Document & chapter: Environmental Impact Assessment Chapter 9, 6.4, 6.9, 6.12	
Issue	The report does not mention dewatering being a licensable activity.
Impact	Dewatering may require a Water Resources Abstraction Licence.
Solution	The Applicant is advised to make early engagement with the Environment Agency's National Permitting Service
Additional dialogue / commentary: The requirement for a Water Resources Abstraction Licence applies unless the activity is exempt under The Water Abstraction and Impounding (Exemptions) Regulations 2017 or RPS 368. The developer should determine the need for an abstraction licence at an early stage. We advise early consideration should be given to this, so that permitting timescales can be built into the development programme so as not to cause delays. The applicant is advised to contact the Environment Agency on 03708 506 506 for further advice and to discuss the issues likely to be encountered or utilise our pre-application advice service. We recommend the developer should follow the Hydrological Impact Appraisal for dewatering abstractions guidance. The proposed development may need: • a groundwater investigation consent (section 32/3 of the Water Resources Act 1991) to construct and test pump; and • a full abstraction licence (Water Resources Act 1991) if the volume of groundwater abstracted is greater than 20 m³/day and abstraction will occur for longer than a period of six consecutive months. Further guidance can be found at: https://www.gov.uk/guidance/water-management-abstract-or-impound-water#abstractions-that-need-a-licence. There may be a requirement for an associated EPR permit to discharge unless an exemption applies; this should also be considered at an early stage.	

Document Reference(s): Environmental Impact Assessment Scoping Report Chapter 14	
Issue	The possibility of encountering unexpected contamination during the construction of the scheme has not been mentioned within the report.
Impact	If a protocol for how to manage unexpected contamination in accordance with Land Contamination Risk Management (LCRM) guidance is not proposed risks to controlled waters may not be adequately assessed and mitigated.
Solution	Ensure that a commitment to managing unexpected contamination is included in the Construction Environment Management Plan and Demolition Environmental Management Plan.
Additional narrative/ explanation We would welcome the opportunity to be consulted on the approach for managing unexpected contamination. Our suggested process is: 1. In the event that contaminated land, including groundwater, is found at any time when carrying out the authorised development, which was not previously identified in the environmental statement, then no further development (unless otherwise approved in writing by the relevant authorities) shall be carried out within the identifiable perimeters of the area in which the suspected contamination is located. It must be reported as soon as reasonably practicable to the local planning authority, and where necessary, the Environment Agency, and the undertaker must complete a risk assessment of the contamination in consultation with the local planning authority, and where necessary, the Environment Agency. 2. Where the undertaker determines that remediation of the contaminated land is necessary, a written scheme and programme for the remedial measures to be taken to render the land fit for its intended purpose must be submitted to and approved in writing by the local planning authority, following consultation with the Environment Agency. 3. Remediation must be carried out in accordance with the approved scheme under sub paragraph (2). Following the implementation of the remediation strategy approved under sub-paragraph (2), a verification report, based on the data collected as part of the remediation strategy and demonstrating the completion of the remediation measures	

must be produced and supplied to the relevant planning authority and the Environment Agency.

The CEMP should include a discovery strategy and information on toolbox talks to be issued to groundworkers who may encounter unexpected contamination.

Document Reference(s): Environmental Impact Assessment Scoping Report Chapter 14

Issue	Only vague information has been supplied about the expected maximum depths of works. We recognise that at this stage more detailed information is not available.
Impact	The potential depth at which construction related impacts may occur are not clear.
Solution	The Applicant should provide Maximum Design Scenario indicative depths for trench and trenchless installation methods and pile and other foundation design and supply a foundation works risk assessment for any penetrative works.

Additional narrative/ explanation

The supplied report indicates wide ranges of depths for both foundations and cable installation. Cable depths should be included in assessment for the CEMP, and a foundation works risk assessment should risk assess foundation design.

Deep foundation, piling and ground improvement methods may create preferential pathways or otherwise result in the mobilisation of contamination or alter groundwater flow paths if not adequately mitigated.

Piling and penetrative ground improvement methods should be designed in accordance with CL:AIRE guidance '[Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention](#)', published March 2025.

A Foundation works risk assessment (including for the Photovoltaic arrays) should be produced in areas of sensitive groundwater such as in Secondary A aquifers, source protection zones or where other receptors may be linked.

Document Reference(s): Environmental Impact Assessment Scoping Report Appendices Appendix 1-A Commitment D62	
Issue	D62 does not specify protection of the Environment such as controlled water
Impact	Key receptors may lack mitigations
Solution	Include reference to the Environment in D62 alongside consultation with the EA on the development of the oCEMP and oDEMP along with the implemented CEMP and DEMP.
Additional narrative/ explanation (if necessary)	
This would ensure the applicants commitment to environmental protection as part of their management plans.	
Document Reference(s): Environmental Impact Assessment Scoping Report, Chapter 3, 3.35	
Issue	Not all groundwater receptors have been identified
Impact	Potential impacts to receptors have not been identified
Solution	Include these receptors in future assessments.
Additional narrative/ explanation	
A receptor has been missed, the Groundwater Dependent Terrestrial Ecosystem Melbourne & Thornton Ings SSSI is within 1.4km of the cable corridor.	

Document Reference(s): Environmental Impact Assessment Scoping Report Chapter 14, 6.25	
Issue	Information on landfills within the Study Area is incomplete.
Impact	Potentially significant sources of contamination may be overlooked.
Solution	The Applicant should ensure all authorised and historic landfills within the Study Area are identified and assessed. We encourage the Applicant to request information relating to authorised and historic landfills within influencing distance of the Proposed Development from the Environment Agency and Local Authorities respectively.
Additional narrative/ explanation	

The Applicant does not identify the presence of an Historic landfill at Harswell, within the Proposed Development screening distance. Also misidentified is the authorised landfill as adjacent when it is within the development area.

Document Reference(s): Environmental Impact Assessment Scoping Report Chapter 4, 4.3

Issue	Infilled mineral extraction pits are noted
Impact	Potential contamination may be present and disturbed by activity
Solution	Mineral extraction pits should be avoided or sufficiently investigated within an LCRM framework.

Additional narrative/ explanation

Mineral extraction pits may be infilled with unknown spoil or materials as such may contain significant contamination and as such disturbance should be avoided or sufficiently mitigated through the CEMP.

Document Reference(s): Environmental Impact Assessment Scoping Report Chapter 4, 4.3

Issue	Buffer Distances are not set. We recognise that this will be done at design stage and will vary depending on the receptors present
Impact	Potential contamination may be present and disturbed by activity or receptors may be put at risk by the introduction of new pathways.
Solution	Final design and CEMP should contain specific Buffer distances for relevant receptors and sources.

Additional narrative/ explanation

Buffer distances are an important way to prevent damage to receptors by preventing a pathway between sources of contamination and receptors that could be put at risk by them. However, it would be unreasonable to expect the applicant to, at this stage, have a full set of buffers set for each receptor and would expect this to be developed through the further assessments that will be completed.

Document Reference(s): Environmental Impact Assessment Scoping Report, Chapter 9, 5.3	
Issue	No mention of a Preliminary risk assessment (PRA), desk-based study or environmental search report has been made.
Impact	Potential receptors or sources of contamination may be missed by the applicant leading to lost time and cost due to design changes
Solution	A PRA should be submitted
Additional narrative/ explanation We would welcome consultation on a PRA including an environmental search and review of historical mapping to ensure all sources of contamination and receptors are identified at an early stage as possible.	

Document Reference(s): Environmental Impact Assessment Scoping Report Chapter 9, 5.38	
Issue	The extreme West of the site has not been identified as sitting on the Sherwood Sandstone
Impact	Geotechnical and environmental issues may not be identified
Solution	Geological description should be updated
Additional narrative/ explanation Our records show an overlap of approx. 120m in the extreme West, which due to anticipated inferred boundary could be greater than this.	

Document & chapter: Environmental Impact Assessment Scoping Report, Chapter 9, 2.2 and Chapter 14, 6.8	
Issue	Missing References to relevant legislation and guidance
Impact	Compliance with relevant laws may be missed and best available practice may not be used increasing risk.
Solution	Refer to and follow all relevant guidance and legislation in further assessments and plans.
Additional dialogue / commentary:	

The report either does not include or does not consistently include:

- The Environmental Permitting Regulations (England & Wales) 2016 (last revised March 2020)
- The Water Supply (Water Quality) (Amendment) Regulations 2018
- Environmental Damage (Prevention and Remediation) (England) (Amendment) Regulations 2019 (2015 is referenced in the report)
- Groundwater (England and Wales) Regulations 2009
- [The Environment Agency's approach to groundwater protection](#)
- [Groundwater protection in England Guidance collection](#)
- CIRIA C532 Control of Water Pollution from Construction Sites – Guidance for Consultants and Contractors (2001)

Document Reference(s): Environmental Impact Assessment Scoping Report Chapter 9 and 14

Issue	Information on groundwater abstractions is not included.
Impact	Impacts to groundwater abstractions may not be identified.
Solution	The Applicant should ensure that all licensed and unlicensed groundwater abstractions within the Study Area are identified and assessed This should include engagement with Local Authorities and the Environment Agency, and a review of historic mapping and British Geological Survey well and borehole records.

Additional narrative/ explanation

Our records show several abstraction licenses within 2km of the Proposed Development footprint particularly for general agriculture and domestic use. These should be considered as a high sensitivity receptors as the abstracted water may be used for food production purposes or consumption.

All groundwater abstractions intended for human consumption or food production purposes have a default SPZ1 with a minimum radius of 50 metres. In some cases, depending on the volumes abstracted, a default SPZ2 with a minimum radius of 250 metres applies.

Activities within these source protection zones should not put at risk the abstraction. For more details we would like to refer the applicant/enquirer to our groundwater position statements in 'The Environment Agency's approach to groundwater protection'. Careful consideration should be made to Table 1. Summary of the position statements that apply to developments and activities in SPZ1.

Document Reference(s): Environmental Impact Assessment Scoping Report Chapter 9 Table 9-8

Issue	No specification of what significance value will be utilised where multiple receptors or risks are identified
Impact	Risk that too low a significance may be applied to a risk
Solution	Where more than one significance value can be determined in matrix should assume worst case significance value unless can demonstrate by professional judgment why lower value can be used.

Additional narrative/ explanation

This follows the guidance the significance values have been based on.

Document Reference(s): Environmental Impact Assessment Scoping Report Chapter 14, 6.24

Issue	No mention has been made of Hydrocarbon Wells Have been made
Impact	Potential contaminant linkages may not be assessed
Solution	Screening should include hydrocarbon wells within 2km of the development site.

Additional narrative/ explanation (if necessary)

BGS Geoindex viewer shows 2 hydrocarbon wells of concern, near Southfield and Hayton. Risks relating to these should be appropriately assessed.

Document Reference(s): Environmental Impact Assessment Scoping Report Chapter 14, Table 14-31

Issue	Inconsistency around disposal of potentially contaminated firefighting water from BESS and/or Substations in the event of a fire at these locations.
Impact	Risk of contaminants being allowed to enter the water environment if testing regime is inadequate. Testing is important to provide information around the quality of water that has been contained after a fire and will ascertain if it contains any contaminants and what level of risk to the water environment the contained firewater has. Disposal of firewater via testing and discharge would require an Environmental Permit, which would require the firewater to be held during the application process. This would significantly reduce the capacity of the drainage system for this period.
Solution	Provide details of what testing is proposed in the event of a fire. The Applicant should consider whether testing and discharge is likely to be viable and consider committing to tankering all firewater off-site for disposal.

Additional Comments:

Firewater containment arrangements at the BESS and Substation sites should be sufficient to contain all anticipated firewater plus accommodating for reasonable worst case rainfall volumes and flooding events.

Chapter 9 Table 9.2 includes a statement that “After a fire event, runoff would likely be collected and tankered from the site.” Section 9.8.47 states that “The runoff will be tested and if required collected from the Order Limits and treated.”

Section 4.3.2 of the Outline Battery Safety Management Plan states that “No discharge will occur until appropriate testing has been completed. Where contamination is identified, the retained water will be removed from site by tanker and transported to an appropriately permitted facility for treatment and disposal. Where testing confirms that water quality is suitable for release, discharge will take place in a controlled manner and only following consultation and agreement with the relevant statutory authority. Any discharge of retained water to a watercourse, groundwater or surface water sewer will be subject to the relevant regulatory regime in force at the time. Where required, an Environmental Permit or other applicable consent will be obtained prior to discharge. No release will occur without prior approval from the relevant regulator, and all actions will be undertaken in accordance with applicable

environmental permitting and pollution control legislation.” The Applicant should be aware that tankering offsite is our preferred method of disposal.

For advice, we expect that water samples would be taken when safe to do so, which would then be sent to a UKAS accredited laboratory for analysis, using UKAS and MCERTS accredited methods (where applicable). The water samples should be checked against the list of hazardous substances in the surface water pollution risk assessment guide: [Surface water pollution risk assessment for your environmental permit - GOV.UK](#).

The discharge of firewater into groundwater or surface water poses an increased risk of contamination to controlled waters. It may take a significant time for consent to discharge firewater into ground or surface water to be issued (or permission may not be granted – see below), during which time there is increased risk that containment measures could be overwhelmed in the event of heavy rainfall and/or a second fire event. The Applicant must ensure that contained firefighting water is removed and the drainage system decontaminated at the earliest opportunity following a fire event to ensure that the storage capacity of the system is not overwhelmed by subsequent rainfall or a second fire event. This is likely to be most readily achieved by tankering away the stored firewater and we encourage the Applicant to commit to this approach to firewater management.

Discharge into drainage systems, and into the water environment onsite may require a permit. It should be noted that the time taken to issue a Groundwater Activity Permit may be substantial, with decisions on applications usually being made within 4 months. This is likely to result in significant delays to resuming operation of the BESS or Substation facility and carries a significant risk that further rainfall events or a second fire event during the testing and permit application period may result in the drainage system being overwhelmed and a pollution event occurring. Further guidance is available at: [Discharges to surface water and groundwater: environmental permits - GOV.UK](#)

Document Reference(s): Environmental Impact Assessment Scoping Report Chapter 14

Issue	High level peat maps are suitable for indicating presence of peat
Impact	Incomplete or incorrect data on peat soils. Receptors may be missed.
Solution	Undertake a peat survey with a method appropriate for lowland peat

Additional Comments:

The report has used BGS GeoIndex online mapping used for bedrock and superficial geology (9.5.7) and Soil Survey of England and Wales 1:250,000 mapping. High level peat maps are suitable for identifying presence of peat, but not for identifying peat at a project level. These mean the existence and extent of an important receptor may not have been taken into account.

Document Reference(s): Environmental Impact Assessment Scoping Report Chapter 14, 2.57

Issue	No methodology has been supplied for referenced soil surveys.
Impact	We are unable to determine if suitable method used for lowland peat, therefore full extent may be greater than referenced.
Solution	Undertake a peat survey with a method appropriate for lowland peat

Additional Comments:

Due to differing methodologies for specific peat types and localities it is important for the Environment Agency to be able to assess whether it has suitably assessed the extent of the peat present.

Document Reference(s): Environmental Impact Assessment Scoping Report Chapter 14, 2.58

Issue	Incorrect Statement - ground mounted Solar Panels will not lead to degradation or loss of soils.
Impact	An environmental impact will not be assessed. Lowland peat continues to degrade with potential further loss of hydrological function, release of carbon and loss of soil if not re-wetted.
Solution	Assess in a report the risks related to hydrological impacts on peat

Additional Comments:

It is important to note that if peat is not re-wet it will degrade and lead to loss of soil, peat degradation and continued carbon emissions making the statement by the applicant inaccurate. As such this should be realised as a risk factor and be updated to reflect this.

Document Reference(s): Environmental Impact Assessment Scoping Report Chapter 2, 10.21 and Chapter 14, 2.24	
Issue	Project will disturb peat
Impact	Peat soils will be lost and carbon emissions increased
Solution	Develop a peat management plan for all stages of the project including de-commissioning, using best practice hierarchy of avoid, minimise, mitigate and offset.
Additional Comments: NPS for Renewable Energy Infrastructure (EN-3) requires solar PV projects to minimise disturbance and protect soil health throughout their lifecycle, including development on peat soils paragraph.	

Document Reference(s): Environmental Impact Assessment Scoping Report Chapter 6, 7.7	
Issue	Possibly inappropriate tools being used to estimate carbon impacts
Impact	Carbon impact calculations will be incorrect
Solution	The applicant should justify their use of Scottish Government Windfarm Carbon Calculation Tool and International Union for the Conservation of Nature (IUCN) Peatland Code Carbon Calculator in relation to lowland peat.
Additional Comments: To ensure calculations are correct the applicant should supply the calculations and modifications used, as the development will be impacting lowland peat, (surface and buried) to inform their calculations and justifications for utilising these specific tools for their potential emissions and assure it is appropriate.	

Document Reference(s): Environmental Impact Assessment Scoping Report	
Issue	Lack of consideration as to whether the project would be a barrier to any lowland peat re-wetting in the catchment
Impact	Impacts on neighbouring land's ability to re-wet at a later date.
Solution	The site should be designed so that actions to re-wet neighbouring peat soils will not be impacted.

Additional Comments:

Lowland Agricultural Peat Task Force, June 2023 and Government Policy, EIP, 2025 support the re-wetting of lowland peat to prevent carbon loss. If taken into account at an early a stage as possible impacts on the ability to re-wet neighbouring land can be prevented.

Informatives

Informative	The oOEMP and final OEMP should include details of the maintenance and repair procedures for all aspects of the development. This should include aspects, not limited to: • Only the use of deionised water for the cleaning of PV panels, to prevent chemicals infiltrating the soils. • Regular inspection and maintenance of drainage feature at the BESS and substations including emergency equipment. • Procedures for excavations in the event or replacement of equipment failure and repair, or necessary maintenance.
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Informative	<u>Lifespan of Infrastructure</u> The Applicant should ensure that all below ground infrastructure is suitable for the operational lifespan of the project to minimise the risk of further preventable disturbance during this period.
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Informative	<u>Sustainable drainage systems</u> The Government's expectation is that sustainable drainage systems (SuDS) will be provided in new developments wherever this is appropriate. The Environment Agency supports this expectation. Where infiltration SuDS are to be used for surface run-off from roads, car parking and public or amenity areas, they should:
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	• be suitably designed • meet Governments non-statutory technical standards for sustainable drainage systems – these standards should be used in conjunction with the National Planning Policy Framework and Planning Practice Guidance • use a SuDS management treatment train – that is, use drainage components in series to achieve a robust surface water management system that does not pose an unacceptable risk of pollution to groundwater Where infiltration SuDS are proposed for anything other than clean roof drainage in a SPZ1, a hydrogeological risk assessment should be undertaken, to ensure that the system does not pose an unacceptable risk to the source of supply. See the Environment Agency’s approach to groundwater protection, position statement G13: Groundwater protection position statements.
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Informative	We expect land contamination assessments to follow the tiered approach laid out in our Land Contamination Risk Management (LCRM) guidance. The preliminary risk assessment (PRA) should include historical plans of the site, an appraisal of the environmental setting (including geology, hydrogeology, groundwater and surface water receptors, potential contaminants of concern and source areas), an initial conceptual site model (CSM) describing possible pollutant linkages for controlled waters, and identification of potentially unacceptable risks. Land contamination investigations should be undertaken by suitably qualified and experienced professionals and in accordance with BS 5930: Code of practice for ground investigations and BS 10175: Investigation of potentially contaminated sites – code of practice. Soil and water analysis should be fully MCERTS accredited. Investigation, demolition, remediation, or construction works must not create new pathways or linkages to controlled waters. Clean drilling techniques may be required for boreholes that penetrate contaminated ground.
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Installations and Waste

Document Reference(s): Chapter 6	
Issue	Climate change risk assessment/climate change adaptation. Scoped out in Chapter 6 (6.6.9)
Impact	Risk from climate change is scoped out. The site has a proposed life span of at least 60 years and will therefore be operating into the 2090's as such it will be subject to the more extreme impacts of climate change associated with a possible 4C increase in average temperatures. Increased frequency, duration and intensity of extreme heat event may impact on the functioning, upkeep and safety of infrastructure such as the BESS and sub-stations and should be considered further.
Solution	Scope in climate change impacts as a risk for the site to account for the long-term risks associated to operation beyond 2050.
Additional narrative/ explanation (if necessary)	

Informatives

The report states that the contractor for the project will have a waste management plan in place. However, the applicant should consider the following.

Landfill Capacity

Following discussions with the Yorkshire Landfill team, you will need to review which landfill sites in East Yorkshire are open and accepting waste. Of the list provided in the planning document, the only landfills currently accepting waste for deposit are Wilberfoss Quarry, Milegate Extension and Ripplingham Cutting. This will drastically reduce the volume of waste that can go to landfills in East Yorkshire and could intern, put pressure on the remaining active landfills across Yorkshire. The landfills that are currently not accepting waste may start accepting waste in the future, but this is not certain. The transport of waste to landfills outside of East Yorkshire will also impact the carbon emissions of the project, as well as possible amenity issues associated with the increased number of vehicles coming onto and off site.

Fisheries

Section	EIA Scoping Report, Chapter 8 Biodiversity, Table 8-7
Issue	Scoping out of River Derwent SAC.
Impact	Bullhead are an Annex II species of the SAC and are highly likely to be present in the Pocklington Beck and Bielby Beck, both of which are within the draft order limits. Any bullhead in these water courses are likely to support the population present in the SAC. There are impact-pathways to this receptor through proposed crossing of watercourses.
Solution	Scope in the River Derwent SAC , based functionally linked population of bullhead. Where this is scoped out, provide supporting evidence.
Additional information	

Section	EIA Scoping Report
Issue	Impacts to fish and aquatic species.
Impact	If impacts to fish are not assessed in the EIA, then the proposal may lead to harm to this receptor and loss or damage to habitat. This may also lead to a deterioration in WFD status.
Solution	Fish and aquatic ecology should be scoped into the EIA. Baseline data should be obtained through a desk study (including EA fish population data) and field surveys. Impact-pathways should be identified and assessed in the EIA, which should include (but not limited to): • impacts on fish from EMFs where high voltage cables (>132kV) pass below main watercourses • impacts from noise and vibration associated with construction • impacts from pollution and increased sedimentation • impacts from open cut crossing of watercourses and potential loss or damage to habitat

	Impacts from light pollution on watercourses and aquatic ecology
Additional information	

Document Reference(s): EIA Scoping Report, Chapter 8 Biodiversity	
Issue	Desk study does not include EA fish population data.
Impact	Insufficient baseline to inform the EIA.
Solution	The desk study must include freely available EA fish population survey data, which is available here - EA Ecology & Fish Data Explorer
Additional narrative/ explanation (if necessary)	

Biodiversity

Document Reference(s): Humberhead Solar Environmental Impact Assessment Scoping Report: 4. Scheme Description Section: 4.5.1	
Issue	Construction is estimated to take around 24 months, yet there appears to be no mention of repeat surveys prior to construction. CIEEM's Advice Note 'On the lifespan of ecological reports & surveys' states that species survey data may be out of date around 12-18 months following a survey.
Impact	Changes in the baseline of species presence and distribution. For example, otters are highly transitory species, therefore an otter could construct a holt prior to or during construction. This may result damage or destruction of holts or disturbance during construction, which are offences under the Conservation of Habitats and Species Regulations 2017 (as amended).
Solution	Pre-construction checks/surveys should be conducted prior to construction, to determine any changes in presence or distribution of species. Pre-construction checks should especially be undertaken at watercourse crossing points, even if no places of shelter (e.g. otter holts or water vole burrows) have been found.
Additional narrative/ explanation (if necessary)	

The development should also consider potential enhancement opportunities within the design. For example, potential enhancement may include habitat improvements or enhancing connectivity of the riverine corridor through the development.

Document Reference(s): Humberhead Solar Environmental Impact Assessment
Scoping Report: 8. Biodiversity

Section: 8.2.3

Issue	Legislation, Policy and Guidance does not include legislation pertaining to BNG.
Impact	Risk of not considering environmental definitions in legislation in respect of BNG, such as 'irreplaceable habitat', along with related offences to said habitats.
Solution	Please include the following legislation, policy and guidance: Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024, for completeness.

Additional narrative/ explanation (if necessary)

As an advisory, we recommend that the applicant follows the guidance recently released by DEFRA regarding BNG and NSIPs (published June 2026). This can be viewed on the gov.uk website.

Document Reference(s): Humberhead Solar Environmental Impact Assessment
Scoping Report: 8. Biodiversity

Section: 8.5.3 & 8.5.4

Issue	The list of completed and proposed/scheduled ecological surveys does not include consideration of INNS.
Impact	Understanding the baseline presence and location of INNS across the scheme is essential to planning effective INNS management.
Solution	We recommend that the applicant schedules a dedicated INNS survey, or records INNS whilst surveying the site (e.g. during the UK Habs Survey).

Additional narrative/ explanation (if necessary)

Where the presence of INNS has been identified, a specific method statements for the INNS species identified (and the locations within which they are present) could be

produced, along with specific measures to be implemented during construction works and/or vegetation and soil removal to ensure that there is no spread of INNS.

Document Reference(s): Humberhead Solar Environmental Impact Assessment
Scoping Report: 8. Biodiversity

Section: 8.6.2

Issue	The applicant mentions that an Invasive Species Management Plan will be implemented but does not mention whether the management plan will include biosecurity measures (i.e. precautionary measures to prevent INNS colonisation) in addition to INNS management.
Impact	Lack of biosecurity planning can lead to the accidental spread of INNS, which is an offence under the Wildlife and Countryside Act 1981.
Solution	Please clarify whether the Invasive Species Management Plan will also include biosecurity measures. This should also be incorporated in Commitment Reference D18, in the Commitments Register (EIA Scoping Report: Appendices).

Additional narrative/ explanation (if necessary)

An example of biosecurity measures is the 'Check, Clean, Dry' protocol, where clothing, equipment and vehicles are disinfected following all work on or near watercourses. If this is not possible, equipment could be cleaned and left to dry for 5 days.

Document Reference(s): Humberhead Solar Environmental Impact Assessment
Scoping Report: 8. Biodiversity

Section: Table 8-12

Issue	Invasive non-native flora have been 'Scoped Out' of the Construction, Operation and Decommissioning stages for both the Humberhead Solar Sites and the CRSC, despite the applicant acknowledging that the spread of invasive species is a potential impact from Construction works (Section 8.6.12).
Impact	The 'Scoping Out' of invasive non-native flora appears to conflict with the applicant's commitment to produce an Invasive Species Management Plan, where

Solution	Please clarify why Invasive non-native species of flora have been ‘Scoped Out’.
Additional narrative/ explanation (if necessary)	

Document Reference(s): Humberhead Solar Environmental Impact Assessment Scoping Report: 9. Water Environment Section: 9.6.24	
Issue	The applicant states that if culverts are required, they will be designed sympathetically to minimise impact on the water environment. Culverts should also be designed with protected species in mind.
Impact	Culverts have the potential to fragment habitats and reduces connectivity, making dispersal and commuting for some species difficult. Culverts also put an added pressure on otters during periods of high water-levels, as culverts offer little room for conveyance and put otters at risk of being killed when crossing roads.
Solution	If culverting is necessary, then we would recommend a box culvert that is as short as possible. The culvert should have a mammal ledge with ramps incorporated (if appropriate) into the design, to ensure connectivity of riparian habitat by allowing otter to pass watercourse crossings.
Additional narrative/ explanation (if necessary) We also note that the applicant proposes to enhance watercourses upstream or downstream of culverts, to account for impacts. Any enhancements should be recorded appropriately within the Watercourse module of the BNG Metric. We approve of the applicant’s proposal to use clear-span structures for permanent crossings.	

Geomorphology

Guidance

The following are general guiding principles to consider when designing watercourse crossings to avoid negatively affecting geomorphology and natural processes:

- Avoid unnecessary interference with natural processes. For instance, encourage use of trenchless techniques such as Horizontal Directional Drilling (HDD) to minimise the likelihood of cables entering the water environment.

- Ensure watercourse crossing design is informed by assessment of fluvial processes and geomorphology. For example, depth of HDD crossing should consider the likelihood of vertical channel change.
- Avoid designs which present legacy risks to natural processes and geomorphology beyond the project lifespan. For example, infrastructure such as access tunnels which are left in-situ after decommissioning could be exposed by future coastal erosion or river movement, becoming an impediment to natural processes.
- Consider opportunities to deliver WFD mitigation measures/BNG uplift as part of the design.
- Avoid preventing delivery of mitigation measures, e.g. avoid bringing cables to surface level in floodplains earmarked for future river restoration or flood defence works (including construction of bypass channels).

Notes:

- i. WFD applies to all surface waterbodies, not just those designated for monitoring purposes.
- ii. Small watercourses and WFD - watercourses with a catchment less than 10km² connected to a downstream WFD waterbody take the classification of that waterbody.
- ii. BNG guidelines indicate that structures built within 10 m of the bank top of a watercourse qualify as encroachment, which may affect the uplift score calculated using the BNG Watercourse metric.

[BNG guidance is mentioned here because our [EA] usual easement for structures, operations, launch pits is to be at least 8m away from the watercourse bank or landward base of fluvial defence structure/embankment (16m if defence structure is for tidal purposes). As stated in the note above, BNG watercourse metric considers anything within 10m of banktop to be encroaching on the watercourse.]

- Any potential construction, operational, and decommissioning phase impacts that the proposed scheme may have on the river must be subject to a WFD Assessment to the satisfaction of the EA.
- Any infrastructural developments on river/floodplain environments should be designed and delivered to have a minimal impact on natural river dynamics (e.g. erosion, deposition, meander migration etc.) and should not place any significant limitations on future river restoration projects.

- Geomorphologically dynamic behaviour is deemed likely to intensify in the next decades in line with Flood Estimation Handbook (Flood Estimation Handbook (FEH) | UK Centre for Ecology & Hydrology (ceh.ac.uk)). Therefore, any infrastructure developments should also take some account of the likelihood for increased lateral and vertical river dynamics anticipated to result from continued hydro-climatic intensification (e.g. 'a flood-rich epoch') over the remainder of the 21st century (i.e., future proofed designs that are not just based on present-day baseline geomorphological configuration/behaviour).
- If river crossings (bridges, culverts, and buried cables) are required as part of the development, we [EA] would expect to see geomorphologically robust designs that will cause minimal impacts on natural fluvial processes operating in the river/floodplain environment over the course of the 21st century.

Further guidance in regard to river crossings can be found in the following document:

SEPA, 2010. Engineering in the water environment: good practice guide River crossings
Second edition. SEPA

Water course sensitivity

- Care should be taken by applicants when determining watercourse sensitivity, especially the use of Q95 scores. Rivers with a higher Q95 flow are not more sensitive than rivers with a lower Q95. In the case of water quality, the reverse of this is true, with less dilution meaning a higher sensitivity to change. Some watercourses with low Q95 may also be winterbournes, and therefore cannot accommodate change easily, as they would be dry for most of the year.
- WFD designation is a method of monitoring and classifying the ecological health of the water environment and not an indication of greater or lesser sensitivity to change. Therefore, watercourses with a WFD designation are no more sensitive than those which have not been designated.

Sensitivity to change cannot be determined from a desk study alone. When determining the sensitivity of a watercourse, the applicant should ensure that professional judgement and the results of any surveys are also incorporated into the assessment.

Appendix B – Permitting/licensing requirements

A number of permits and licenses may be required to facilitate this scheme.

Should you wish to disapply any element of these proposals and bring within the scope of the Development Consent Order (DCO) details of this should be provided to the Environment Agency a minimum of 6 months prior to DCO submission.

We will require a consenting strategy document to be submitted in support of the proposals which outlines a programme of managing the various consents and permits, and confirmation of whether this will be subsumed within the DCO process or as standalone permits.

We recommend early engagement with our National Permitting Service (NPS) and full use of their enhanced pre-application advice service to ensure the permitting requirements and implications are fully understood and addressed in good time to inform the Planning Inspectorate (PINS) decision making process. Twin tracking is recommended for those applications considered fundamental to the DCO.

Please refer to PINS Annex D advice note for further information on how the Environment Agency's planning and permitting process can be best aligned within DCOs: Nationally Significant Infrastructure Projects - Advice on working with public bodies in the infrastructure planning process, Annex D: Environment Agency - GOV.UK.

Permitting pre-application advice: <https://www.gov.uk/guidance/get-advice-before-you-apply-for-an-environmental-permit>.

Land Remediation

Any remediation of land contamination may require site permits and mobile treatment licence

Waste on site

Excavated materials that are recovered via a treatment operation can be re-used on-site under the CL:AIRE Definition of Waste: Development Industry Code of Practice. This voluntary Code of Practice provides a framework for determining whether excavated material arising from site during remediation or land development works are waste.

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on-site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

The Environment Agency recommends that developers should refer to:

- Position statement on the Definition of Waste: Development Industry Code of Practice

- our website at <https://www.gov.uk/government/organisations/environment-agency>

Waste to be taken off site

Contaminated soil that is, or must be disposed of, is waste. Therefore, its handling, transport, treatment and disposal is subject to waste management legislation, which includes:

- Duty of Care Regulations 1991
- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Permitting (England and Wales) Regulations 2010

The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standards BS EN 14899:2005 'Characterisation of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

If the total quantity of waste material to be produced at or taken off site is hazardous waste and is 500kg or greater in any 12-month period, the developer will need to register with us as a hazardous waste producer. Refer to our website at www.gov.uk/government/organisations/environment-agency for more information.

Waste management

The recycling, storing, treating or disposing and use of waste is an activity that will require an Environmental Permit under the Environmental Permitting (England and Wales) Regulations 2016, unless a waste exemption applies or compliance with a Quality Protocol or Code of Practice can be demonstrated, for example Definition of Waste: Development Industry Code of Practice ('DoWCoP') published by CL:AIRE. Further information about permitting is available on GOV.UK: Environmental permits - GOV.UK.

Where the applicant intends to use the Definition of Waste: Development Industry Code of Practice ('DoWCoP') for the re-use of excavated materials on site, this should be followed in full. Materials not used in accordance with the DoWCoP process in full may be deemed waste and will require a relevant permit for deposit. A formal Declaration must be submitted by a QP before any use of materials on site or transfer is permitted. Declarations deal with the re-use of materials. The receipt of a declaration does not remove the need for an environmental permit where treatment is required prior to re-use.

The applicant should note that granting of planning permission is independent of a permit determination, and a permit application considers factors such as operator competence and operating techniques which have not been considered here.

The Environmental Protection (Duty of Care) Regulations 1991 for dealing with waste materials are applicable to any off-site movements of wastes.

The code of practice applies to you if you produce, carry, keep, dispose of, treat, import or have control of waste in England or Wales.

The law requires anyone dealing with waste to keep it safe and make sure it's dealt with responsibly and only given to businesses authorised to take it. The code of practice can be found here: [Waste duty of care code of practice - GOV.UK](#) If you need to register as a carrier of waste, please follow the instructions here: [Register or renew as a waste carrier, broker or dealer - GOV.UK](#)

In order to meet the applicant's objectives for the waste hierarchy and obligations under the duty of care, it is important that waste is properly classified. Proper classification of the waste both ensures compliance and enables the correct onward handling and treatment to be applied. More information on this can be found here: <https://www.gov.uk/how-to-classify-different-types-of-waste>.

Risk assessments for buried electricity cabling

Background

Following the 2023 amendments to the Environmental Permitting Regulations 2016 heat is now a groundwater pollutant. Discharge of heat to water should be a material consideration for developments involving emissions of heat e.g., buried electrical cables, particularly NSIPs or large-scale infrastructure developments. To date heat input to ground has been considered lower risk to groundwater, on the understanding it readily disperses in the surface layers and air and in general does not have any widespread adverse impacts on the ground and groundwater. However, in very sensitive locations, we may want to regulate higher risk activities to prevent further increase/ deterioration of the groundwater quality.

The Environment Agency is currently developing guidance about heat as a pollutant to groundwater and to date has published a regulatory position statement, guidance on the exemptions, and a permitting regime for open and closed loop ground source heating a cooling systems (GSHCs).

The guidance will draw upon the Environment Agency's Chief Scientist's Group published report for [Ground Source Heating and Cooling \(GSHC\) systems](#). This report examines the potential for ground source heating and cooling systems to change the temperature in the ground and identifies receptors that could be impacted.

Permitting implications

Heat is a pollutant, so discharges that might lead to an input of heat into groundwater are groundwater activities. Groundwater activities are defined in section 3.34 pp20 of DEFRA's [Environmental permitting: Core guidance](#).

However, we take a proportionate and pragmatic approach in our application of the principles of the Environmental Permitting Regulations. Requiring a permit would feel disproportionate for many activities at or near the ground surface.

Accountability to comply with extant environmental legislation lies with the developer and the landowner. They should consider the thermal implications of developments which emit heat such as buried electricity cables, and the potential risks to the water environment via a desk-based assessment, as a minimum.

Desk-based risk assessment

Currently, the main driver for the prevention of heat pollution is to protect surface water ecology, protected sites and ancient woodlands. Heat should also not impact quality or quantity of water in existing groundwater or surface water abstractions. In the first instance the developer should ensure that where practicable the proposed cabling:

- is fully sealed
- does not discharge pollutants other than transfers heat to the environment,
- does not cause pollution of surface water or groundwater,
- is not within a groundwater source protection zone 1 (SPZ1) that's used to supply water for domestic or food production purposes,

- is not within 50m of a well, spring or borehole used to supply water for domestic or food production purposes,
- installation does not mobilise any contaminants present in the subsurface to the extent that the pollution of groundwater occurs,
- is not adjacent to a septic tank or cesspit, including the infiltration system,

Desk based assessments at the planning stage should scope in heat from electricity cables. The GSHC exemption criteria and resources referenced in this document could help assess the risk. For example: either by de-risking, if all criteria are met or further assess the risk, where the criteria are not met and mitigate the risk, where required. In other words, sections of the cabling route that meet all of these criteria, and where the developer is satisfied that the cables will not cause harm via discharge of heat and heat pollution, can be scoped out from requiring further risk assessment.

You do not need to complete any further assessments or apply for a permit if your cabling route meets all the exemption conditions.

If cabling sections require further assessment following application of these exemptions, a conceptual site model (drawing) should be produced. We ask for the model to demonstrate the proposed installation depth, anticipated depth to groundwater, and specification of the cable installation, including thermal insulation measures. An understanding of the expected normal and maximum operating temperature of the cables, and the depth of any nearby abstraction boreholes will be useful in determining risk.

In those rare instances where we are concerned that there are risks which require ongoing control or management, you may require a groundwater activity under schedule 22 of the Environmental Permitting Regulations (EPR) 2016.

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Guidance for responding to planning consultations for Battery Energy Storage Systems

1. What are Battery Energy Storage Systems?

Battery energy storage systems (BESS) enable energy to be stored and then released when the power is needed most. This is particularly important for renewable energy sources, such as solar and wind, which are generated dependent on weather conditions. BESS allow energy to be stored to help electricity grids ensure a reliable supply of energy.

Lithium-ion batteries are currently the dominant storage technology for large scale BESS. Even within L-ion batteries the chemistry varies, and potentially any associated risks will also change with the chemistry or the technology being deployed. They are often located close to solar farms and wind turbines, but they can also be standalone.

Electric battery storage is likely to play an important role in achieving the UK's Net Zero ambitions and it is expected that there will be high demand for the recycling and recovery of critical minerals held within batteries at end of life.

2. Who is this guidance for?

This guidance is for officers in area Sustainable Places teams and in the National Infrastructure Team responding to planning consultations for BESS developments. It is also for area teams that provide technical advice to area Sustainable Places teams on planning consultations, including Partnership and Strategic Overview teams, Groundwater and Contaminated Land teams and EM Land and Water teams.

3. Regulatory requirements

BESS do not currently fall within the Environmental Permitting Regulations, Hazardous Substances Consent or COMAH regimes. We will keep this guidance under review and update it should BESS operations become a regulated activity.

Batteries within BESS at the end of their useful life will still need to be dealt with in compliance with waste legislation. Also, the requirement for a flood risk activity permit still applies to BESS development (i.e. if proposed on or near a main river, flood defence structure or in a floodplain).

4. Guidance on battery energy storage

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The National Fire Chiefs Council have provided guidance as part of planning practice guidance (<https://nfcc.org.uk/our-services/building-safety/grid-scale-energy-storage-system-planning-guidance-for-fire-and-rescue-services/>) for applicants to consider when preparing applications for BESS developments, to advise Fire and Rescue Services when consulted on applications for BESS developments and for local planning authorities (LPAs) to consider when determining BESS applications. The guidance provides advice on the design and layout of BESS developments to promote fire prevention and containment and adequate and safe access for fire and rescue services into the BESS facility and to firefighting infrastructure. The guidance also notes that 'suitable environmental protection measures should be provided', including:

- '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', and
- 'Flood protection or mitigation measures' for 'sites located in flood zones'.

The Department for Energy Security and Net Zero have published guidance: [Health and safety in grid scale electrical energy storage systems](#). This guidance focusses on topics related to health and safety covering the development, operation and decommissioning of BESS developments. It includes a section on 'Design and planning' that provides guidance on battery technology, site selection, site layout and emergency planning. It also includes a section on 'Decommissioning and end of life', including dealing with batteries that have come to the end of their use in the BESS.

5. Consultation requirements

External consultation triggers

Planning permission is required for BESS developments. We are not a statutory consultee for these developments, but we will be consulted if other consultation criteria are triggered, such as:

- Developments in Flood Zone (FZ) 2 or 3, or within 20m of main river
- EIA development
- Potentially contaminating development located in source protection zones¹
- Developments on land where a previous use of the site may have caused contamination.

If we are consulted on a BESS development that due to locally agreed thresholds we would not normally respond to, then the request remains an inappropriate consultation and there is no need to respond. We will keep this position under review and let area teams know if this changes.

Internal consultation

¹ There isn't a DoE Industry Profile for BESS but alternative guidance can be used - <https://publishing.energyinst.org/topics/power-generation> (note the Environment Agency subscribes to the Energy Institute publications library and creating an account with an Environment Agency email address is free).

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Follow the usual internal consultation arrangements to obtain technical advice for planning consultations for BESS developments, including national and local internal consultation tools.

BESS developments are a relatively new development type. Our current understanding is that the chemicals used in batteries are likely to present risks to the environment and the chemicals they contain are evolving.

It is likely to be necessary for local consultation arrangements to include consultation with:

- Partnerships and Strategic Overview (PSO) teams for BESS developments located in flood zones 2 and 3, and within 20 metres of main river.
- Groundwater and Contaminated Land (GWCL) teams for BESS developments located in vulnerable groundwater locations or on sites affected by land contamination.
- EM Land and Water teams for BESS developments located on sites that drain to surface water bodies.

Applications for BESS developments are unlikely to require internal consultation with Installations, although you may wish to notify the team about the development for awareness. A waste informative is provided in the 'Standard paragraphs' section of this guidance to cover risks associated with end of life management for industrial batteries.

6. Risks to the environment from BESS developments

BESS developments could present the following risks in our interest:

- They could be at risk of flooding
- Pollution risks (including fire-related risk) to surface water and groundwater
- The links between flood risk and pollution risk
- Management of end of life batteries

7. Advising on key risks

Flooding risks

Flooding risks to consider for BESS developments include:

- Flood risk vulnerability classification
- Assessing and mitigating risks

Flood risk vulnerability classification

At present, there is a lack of clarity regarding the flood risk vulnerability classification of BESS development in [National Planning Policy Framework Annex 3 'Flood risk vulnerability classification'](#). Applicants may wish to make a case that their BESS development is 'essential infrastructure' in order for it to comply with the position in [Table 2: Flood risk vulnerability and flood zone 'incompatibility'](#). Alternatively, they may want to make a case that their BESS development is 'less vulnerable' in order to apply a lower climate change allowance or to remove the requirement that they're designed to 'remain operational' during flooding. Whilst

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we can offer advice, the final decision regarding the vulnerability classification of a BESS development lies with the LPA.

We have sought clarity regarding the vulnerability classification of BESS development from MHCLG and expect this to be addressed in future updates to [Annex 3](#) of the NPPF (the section where the vulnerability classification sits). However, we do not currently have a timescale for this update.

It is important to note that under NPPF Annex 3 we consider it is reasonable that wind turbines and solar farms are treated as ‘essential infrastructure’, irrespective of whether there’s an operational reason for them to be located in a flood risk area. As such, it is reasonable to expect associated BESS development to be co-located with these uses and therefore to be treated as ‘essential infrastructure’ in such circumstances.

For standalone BESS development, until the vulnerability classification is updated, or other guidance is provided by MHCLG (or DESNZ), we also consider it reasonable to treat such facilities as ‘essential infrastructure’ if providing ‘grid and primary substations storage’ (e.g. if the BESS is connected to the national grid).

In the absence of a clear steer in Annex 3, we also consider it reasonable that ‘non-grid BESS’ proposals (i.e. those not connected to the national grid) are treated as ‘essential infrastructure’, especially within Flood Zone 3b (functional floodplain), unless the applicant makes a case otherwise. An example of an industrial process that is not classified as ‘essential infrastructure’ could be a BESS for a steel foundry to allow them to operate during the day using lower cost overnight electricity. It is the applicant’s responsibility to make the case for it being ‘less vulnerable’ and for the LPA to judge their case and make the final decision. If the LPA considers a non-grid BESS proposal to be ‘less vulnerable’ we should accept this position.

If considered ‘essential infrastructure’, a BESS development’s design flood level that will inform onsite mitigation will need to be subject to the ‘higher central’ peak river flow allowances for climate change. See <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances> for further details.

Assessment and mitigation

When BESS development is to be considered ‘essential infrastructure’, it would need to:

- Be subjected to the Sequential Test
- Be subjected to the Exception Test in FZ3, if avoidance can’t be achieved through the Sequential Test
- The notes to [Table 2 of PPG](#) also stipulate that it should be designed and constructed to remain operational and safe in times of flood
- Comply with the other stipulations of NPPF paragraphs 170 and 181
- If they’re considering sites in functional floodplain, it will need to be designed and constructed to:
 - remain operational and safe for users in times of flood;
 - result in no net loss of floodplain storage;
 - not impede water flows and not increase flood risk elsewhere.

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In the unlikely event that a LPA determines that a non-grid BESS should be considered 'less vulnerable' development, it would need to:

- Be subjected to the Sequential Test
- Be designed to be safe throughout its lifetime without increasing flood risk elsewhere – but would not need to be designed to remain operational during flooding
- Comply with the other stipulations of NPPF paragraphs 165 and 181
- Avoid functional floodplain (Flood Zone 3b) as Table 2 of PPG says such uses 'should not be permitted'.

The NPPF requires development to be safe and 'appropriately flood resistant and resilient'. 'Essential infrastructure' has to be designed and constructed to remain operational during a flood event, which means equipment necessary for its operation would need to remain dry – i.e. raised above estimated flood levels (with an appropriate climate change allowance and freeboard for uncertainty). If a BESS proposal is being considered 'less vulnerable', it may not need to be designed to remain dry, but it would need to be sufficiently resistant/resilient so that it could be quickly brought back into use without significant refurbishment – as stipulated by NPPF para 181b.

Following the position in Planning Practice Guidance for non-residential/commercial development, a development lifetime of 75 years should be the starting point. While the initial batteries will be replaced in a much shorter timescale, once the use is established, there is a strong possibility the batteries in the system will be replaced with the latest battery technology and that this won't need planning permission. We know that once a site is used for energy generation with associated infrastructure such as connection to the national grid and for transport (road and rail connections), the site continues to have such use, albeit with different energy generation method. Overall, there is a strong case for a conservative approach to development lifetime and thus the impact of climate change on the development. If applicants are arguing for a significantly shorter lifetime to be considered (e.g. 30 years) we should consider recommending a time-limited planning permission or controls that require flood risks to be re-assessed and addressed in future.

Applicants would also need to show that residual risks can be safely managed. This means it is reasonable to ask them to consider a more extreme flood and the consequences of the failure of any relevant flood defences.

BESS development wouldn't necessarily have to be designed to remain operational in such residual risk scenarios, but it is important that there aren't safety issues such as the potential for flooding to cause or exacerbate a fire and/or pollution incident. The applicant is required to provide suitable mitigation to 'safely manage' these residual risks, for example:

- Receiving a flood warning in advance of an extreme flood and having a protocol for shutting down the BESS facility to remove these risk before flooding occurs.
- Creating an automated shut-off procedure when flood waters are detected to address flood risk that may have little or no warning such as breach.

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If shutting down the facility wouldn't remove the risk of fire/pollution, or if the protocol couldn't be implemented quickly enough before the onset of flooding, then a higher level of built-in resilience is likely to be needed.

BESS facilities are often un-staffed, operated remotely from a control centre, thus the direct risk to people is probably low. However, this should not be an argument for failing to provide free and voluntary movement during the design flood event, as access to the site to respond in person to any kind of issue/problem which may be caused or exacerbated by flooding remains important. We should continue to follow our [Commenting on access and egress including flood warning and evacuation procedures in planning applications](#) position statement.

Where BESS developments are considered 'essential infrastructure', there is a very robust set of policy requirements to ensure any such development is appropriately located (e.g. steered away from flood risk areas) and designed. Applicants and LPAs should also be motivated to comply with these requirements because:

- Flood risk could also increase fire risk and pollution risk and hinder any response to such incidents.
- An operator of such a facility is clearly not going to want to risk the batteries being ruined by a flood.
- Operators will also want to avoid disruption due to flooding which prevents the facility from serving its purpose of making electricity available for sale to the grid during times when demand outstrips supply.

Risk to groundwater and surface water

Under normal operation BESS developments do not present significant risks to groundwater or surface water. However, there is potential for pollution of the water environment due to abnormal and emergency situations at BESS developments, in particular fires. This would be exacerbated if in a vulnerable location, such as an SPZ1, shallow groundwater table or near a surface watercourse².

Generally, the risks to groundwater and surface water from BESS development would be from pollution of surface water drainage from the site due to:

- A battery container fire at a BESS site
- Accidents or spillages from battery containers at a BESS site.

In the event of a fire at a BESS it is currently considered best practice to let the containers on fire burn out. However, water is likely to be used to cool neighbouring containers. This water could enter burning containers through surface run off or directly from spray cooling neighbouring containers. Furthermore, during or following a fire at a BESS development, rainwater could enter exposed containers during the period of time it takes to remove or cover burnt out containers.

² Risk due to proximity to a water course depend on slope/gradient of the land, ground conditions (e.g. clay soils) and proximity to the watercourse.

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There is a risk that highly polluting chemicals in batteries could enter groundwater or surface water in firewater or rainfall. Applicants should consider this risk and ensure mitigation is in place to ensure containment of this water. To appropriately manage the risks from pollution of groundwater and surface water, applicants will need to assess the likelihood of pollutants within the site coming into contact with nearby waterbodies, directly or indirectly, and the degree of risk posed by the particular pollutants in question.

When we are consulted on BESS development we should check if the application includes:

- An adequate assessment of risks to groundwater, including a conceptual site model, and
- Suitable provisions to contain water in the event of a fire. The capacity for such systems should be determined by the applicant in liaison with the fire service.

If the site drains to a surface watercourse we should check the application includes suitable provisions to assess and mitigate risks from surface water drainage in the event of a fire.

Where a site is in an area at risk of flooding, these assessments need to link with the FRA and assess the risk that flooding could cause fire and cause pollution.

To mitigate the risks to groundwater and surface water, as well as, proposing appropriate measures to manage activities, applicants should consider whether BESS battery containers should be located away from vulnerable receptors to reduce associated environmental risks. For example, where a BESS is part of a solar farm, can it be located elsewhere on the site to avoid vulnerable groundwater areas or being near to surface watercourses.

It may also be important to consider the risk of failure of mitigation measures to manage identified risks. For example, the risk that a containment system to contain surface water in the event of a fire may fail because of the fire. The extent of the measures taken to assess and manage this risk may depend on the sensitivity of the groundwater or surface water bodies affected.

We should also provide informative advice, as appropriate, to:

- Direct applicants and LPAs to other advice including guidance published by The Department for Energy Security and Net Zero: [Health and safety in grid scale electrical energy storage systems](#) and The National Fire Chiefs Council guidance that is pervaded as part of [planning practice guidance](#)
- Advise on the need for an emergency response / contingency plan
- Advise on the need for groundwater investigation consents for boreholes to abstract water in the event of a fire.

We have provided standard paragraphs that can be included on our response to consultations for BESS developments to ensure risks to groundwater and surface water are adequately assessed and managed (see below).

The standard paragraphs for groundwater protection propose a more precautionary approach in the most vulnerable locations, for example in source protection zone 1, within 50 metres of

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a known well/borehole/spring used for the supply of water for human consumption or on a principal aquifer. In such scenarios we would object unless a suitable mitigation strategy is in place that we have agreed before permission is granted. An exception to this could be where a mitigation strategy has been largely agreed but there are a few outstanding matters to finalise that would not materially affect the suitability, viability or feasibility of the scheme. In this scenario a condition could be used to ensure that a mitigation strategy will be agreed and in place to manage the risks.

In less vulnerable locations, for example within source protection zone 2/3 or on a secondary aquifer A, secondary aquifer B or a safeguard zone, we take a less precautionary approach advising a condition should be included to ensure that a mitigation strategy will be in place to manage the risks, but this does not need to be agreed before permission is granted. Where there are significant risks in less vulnerable locations, for example due to the scale of the BESS proposals or complexities at the site such as space constraints, then it may be appropriate to object until a suitable mitigation strategy is in place that we have agreed before permission is granted.

Management of risks from land contamination

If the site for the proposed BESS development is contaminated land which has been designated as a special site or its previous use presents a high or medium risk of contamination that could be mobilised during construction to pollute controlled waters, we would expect a preliminary risk assessment to be undertaken and appropriate mitigation measures to be put in place. Use the 'Contaminated land' standard paragraphs as to respond as appropriate.

Solar farms are popular on former or closed landfill sites, and therefore a BESS could also be sited on landfill. Where this is the case area GWCL teams should be made aware so they can consider the risks.

Management of end of life industrial batteries

When a battery within a battery storage unit comes to the end of its use in the BESS, it will need to be removed from site and dealt with in compliance with waste legislation. (including the UK's producer responsibility regime for batteries as set out in The Waste Batteries and Accumulators Regulations 2009). Removing the battery at end of life will need to be in compliance with waste regulations including Waste Duty of Care (Section 34, Environmental Protection Act 1990) and subsequent regulations.

When batteries reach the end of their useful life in the BESS site operators must ensure you follow relevant reuse, repurpose or waste regulations and guidance to ensure appropriate onward handling.

We have provided a standard paragraph that can be included on our response to consultations for BESS developments to make applicants aware of operators' responsibilities (see below).

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8. Standard paragraphs

Fire water management risks to groundwater

Use the following standard paragraphs for fire water management risks to groundwater.

Objection - Inadequate assessment of ground conditions / risks to groundwater

Use the following standard paragraph where a BESS proposal does not provide an adequate assessment of ground conditions in:

- is within source protection zone <1/2/3>, or
- is within 50 metres of a known <well/borehole/spring> used for the supply of water for human consumption, or
- is located upon <principal aquifer/secondary aquifer A/secondary aquifer B/a safeguard zone>

NGW O 09 Insufficient information to determine risks to groundwater – Battery Energy Storage Systems

Environment Agency position

We object to the planning application, as submitted, because the risks to groundwater from the development are unacceptable. The applicant has not supplied adequate information to demonstrate that the risks posed to groundwater can be satisfactorily managed. We recommend that planning permission should be refused on this basis in line with paragraph 187 of the National Planning Policy Framework.

Reason(s)

These should be provided based on the following prompts:

Groundwater is particularly sensitive in this location because the proposed development site [insert as appropriate]:

- *is within source protection zone 1*
- *is within 50 metres of a known <well/borehole/spring> used for the supply of water for human consumption*
- *is located upon principal aquifer*

We consider that the proposed development poses an unacceptable risk of causing a detrimental impact to groundwater quality because there is potential for pollution of the water environment due to abnormal and emergency situations at Battery Energy Storage System

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(BESS) developments, in particular fires. This would be exacerbated in a vulnerable groundwater location. There is a risk that highly polluting chemicals in batteries could enter groundwater in firewater or rainfall. Applicants should assess risks to groundwater and ensure mitigation is in place for containment of this water.

While in the event of a fire at a BESS, it is accepted best practice to let the containers on fire burn out, it is likely water will be used to cool neighbouring containers. This water could enter burning containers through surface run off or directly from spray cooling neighbouring containers. Furthermore, during or following a fire at a BESS development, rainwater could enter exposed containers during the period of time it takes to remove or cover burnt out containers.

To ensure development is sustainable, applicants must provide adequate information to demonstrate that the risks posed by development to groundwater can be satisfactorily managed. In this instance the applicant has failed to provide this information and we consider that the proposed development may pose an unacceptable risk of causing a detrimental impact to groundwater quality because:

Optional WFD justification: [Insert NGW I 10 if necessary]

Overcoming our objection

We will maintain our objection until we receive a satisfactory risk assessment that demonstrates that the risks to groundwater posed by this development can be satisfactorily managed.

[Insert free text detailing what information is required to assess the potential risk to sensitive groundwater receptors]

The applicant should submit a preliminary risk assessment which includes but not limited to a desk study, site walkover, conceptual model, initial risk evaluation, details of any uncertainties, data gaps and limitations, conclusions and justification for assumptions.

This information must demonstrate to the local planning authority that the risks to groundwater has been fully understood and can be addressed through appropriate measures [include any other site-specific requirements as necessary].

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**Advice to SP
and
consultees**

This objection is related to [NGW O 01](#) but applies where we lack sufficient information to assess the risks to groundwater. It will help to strengthen our objection if we can cite any instances involving contamination or pollution of groundwater arising from developments in similar circumstances to that proposed.

Note that the groundwater protection guidance '[Environment Agency's approach to groundwater protection](#)' is being revised and will include a position for BESS development when updated that should provide an appropriate supporting position to justify this objection in the future.

Important! *You must indicate what kind of risk assessment information is required to assess the risks posed by the development.*

Where we lack a risk assessment in the context of development with unacceptable risk to potable water supplies or development involving non-mains drainage use the specific objection paragraphs below.

Objection - Inadequate mitigation in vulnerable groundwater locations

Use the following paragraph where BESS proposals do not include measures to manage surface water run off in the event of a fire at a BESS development in:

- source protection zone 1, or
- is within 50 metres of a known <well/borehole/spring> used for the supply of water for human consumption, or
- is located upon a principal aquifer

NGW O 10 Unacceptable risk to groundwater quality – Battery energy storage systems

Environment Agency position

We object to the planning application, as submitted, because the proposed development would pose an unacceptable risk of pollution of groundwater. We recommend that planning permission should be refused on this basis, in line with paragraph 174 of the National Planning Policy Framework.

Reason(s)

These should be provided based on the following prompts:

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Groundwater is particularly sensitive in this location because the proposed development site [insert as appropriate]:

- *is within source protection zone 1*
- *is within 50 metres of a known <well/borehole/spring> used for the supply of water for human consumption*
- *is located upon principal aquifer*

In this case there is potential for pollution of the water environment due to abnormal and emergency situations at Battery Energy Storage System (BESS) developments, in particular fires. This would be exacerbated in a vulnerable groundwater location. There is a risk that highly polluting chemicals in batteries could enter groundwater in firewater or rainfall. Applicants should assess risks to groundwater and ensure mitigation is in place for containment of this water.

While in the event of a fire at a BESS, it is accepted best practice to let the containers on fire burn out, it is likely water will be used to cool neighbouring containers. This water could enter burning containers through surface run off or directly from spray cooling neighbouring containers. Furthermore, during or following a fire at a BESS development, rainwater could enter exposed containers through the period of time it takes to remove or cover burnt out containers.

*Optional WFD justification: [Insert **NGW I 10** if necessary]*

Overcoming our objection

The applicant should provide [insert specific information required to overcome our objection]. This information must satisfactorily demonstrate to the local planning authority that the risks to controlled waters have been fully understood and can be addressed through appropriate measures. This information should include:

[describe risks to controlled waters that need to be addressed]

The applicant should submit a preliminary risk assessment which includes but not limited to a desk study, site walkover, conceptual model, initial risk evaluation, details of any uncertainties, data gaps and limitations, conclusions and justification for assumptions.

This information must demonstrate to the local planning authority that the risks to groundwater has been fully understood and can be addressed through appropriate measures [include any other site-specific requirements as necessary].

Please read: This is internal guidance that Environment Agency officers use when responding to consultations for advice on planning applications and pre-application enquiries. The guidance includes advisory considerations and does not represent a policy position. Government policy and guidance will always override any consideration in this guidance note where there is conflict between the two positions. This guidance can be shared with developers and the public, so they are aware of our considerations when consulted on developments including Battery Energy Storage Systems. It is intended that this guidance will be updated periodically. Officers are advised to check the date of the current version. This guidance does not prejudice any advice the Environment Agency may subsequently wish to provide when consulted on individual proposals. Each officer must use their professional judgment on a case-by-case basis.

**Advice to SP
and
consultees**

Note that the groundwater protection guidance '[Environment Agency's approach to groundwater protection](#)' is being revised and will include a position for BESS development when updated that should provide an appropriate supporting position to justify this objection in the future.

Important! *If you wish to object due to a lack of information to assess the risks to groundwater use **NGW O 09** 'Inadequate assessment of ground conditions / risks to groundwater'.*

Condition: Mitigation to manage risks to groundwater

Within a vulnerable groundwater location, but outside of SPZ 1, principal aquifer or 50m of known <well/borehole/spring> used for the supply of water for human consumption, the following condition should be recommended for the containment of surface water run off in the event of a fire. Use this condition for BESS developments in:

- is within source protection zone <2/3>
- is located upon <secondary aquifer A/secondary aquifer B/a safeguard zone>

This condition could also be used for a development within a SPZ 1, upon a principal aquifer or within 50m of known well/borehole/spring used for the supply of water for human consumption where a mitigation strategy has been largely agreed but there are a few outstanding matters to finalise that would not materially affect the suitability, viability or feasibility of the scheme.

Note that the groundwater protection guidance '[Environment Agency's approach to groundwater protection](#)' is being revised and will include a position for BESS development when updated that should justify this position in the future.

NGW C 14 Mitigation for containment of surface water run off for Battery Energy Storage System developments

Environment Agency position

The proposed development will be acceptable if the following measure(s) are implemented and secured by way of a planning condition on any planning permission.

Condition

The development hereby permitted shall not be commenced until such time as a scheme to [insert from list below] in the event of a fire has been submitted to, and approved in writing by, the local planning authority. The scheme shall be implemented as approved.

Please read: This is internal guidance that Environment Agency officers use when responding to consultations for advice on planning applications and pre-application enquiries. The guidance includes advisory considerations and does not represent a policy position. Government policy and guidance will always override any consideration in this guidance note where there is conflict between the two positions. This guidance can be shared with developers and the public, so they are aware of our considerations when consulted on developments including Battery Energy Storage Systems. It is intended that this guidance will be updated periodically. Officers are advised to check the date of the current version. This guidance does not prejudice any advice the Environment Agency may subsequently wish to provide when consulted on individual proposals. Each officer must use their professional judgment on a case-by-case basis.

- *dispose of surface water*
- *install oil and petrol separators*
- *roof drainage –sealed at ground level*
- *[other requirements as necessary – write free-form].*

Reason(s)

The submitted planning application <includes/is for> Battery Energy Storage. Highly polluting chemicals in batteries could enter groundwater in firewater or rainfall should battery containers become exposed in the event of a fire. The local planning authority should ensure mitigation is in place to ensure containment of this water.

While in the event of a fire at a BESS, it is accepted best practice to let the containers on fire burn out, it is likely water will be used to cool neighbouring containers. This water could enter burning containers through surface water run off or directly from spray cooling neighbouring containers. Furthermore, during or following a fire at a BESS development, water could enter exposed containers through rainfall during the period of time it takes to remove or cover burnt out containers.

Groundwater is particularly sensitive in this location because the proposed development site [insert as appropriate]:

- *is within source protection zone <2/3>*
- *is located upon <secondary aquifer A/secondary aquifer B/a safeguard zone>*
- *is within source protection zone 1*
- *is located upon principal aquifer*
- *is within 50m of known <well/borehole/spring> used for the supply of water for human consumption*

In light of the above, the proposed development will be acceptable if a planning condition securing adequate pollution prevention measures is included on any planning permission granted. Without this condition we would object to the proposal in line with paragraph 187 of the National Planning Policy Framework because it cannot be guaranteed that the development will not present unacceptable risks to groundwater resources.

Advice to SP and consultees

Using this condition within a SPZ 1, upon a principal aquifer or within 50m of known well/borehole/spring used for the supply of water for human consumption could only be appropriate where a mitigation strategy has been largely agreed but there are a few outstanding matters to finalise that would not materially affect the suitability, viability or feasibility of the scheme.

Informative – Boreholes to abstract water in the event of a fire – groundwater investigation consents

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NGW I 12 Informative – Boreholes to abstract water in the event of a fire – groundwater investigation consents

The Environment Agency regulates the abstraction of water from surface water and underground sources. An abstraction licence is not needed to install and test a borehole solely for the purpose of firefighting (including training and testing). It is recommended the operator of the site obtains a groundwater investigation consent (under section 32/3 of the Water Resources Act 1991) so they can find out whether there is adequate water available. See [Apply for consent to investigate a groundwater source - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/apply-for-consent-to-investigate-a-groundwater-source) for further information.

Fire water management risks to surface water / water quality

Objection - Unacceptable risk to water quality

Use new standard paragraph ‘SWQ O 06 Unacceptable risk to water quality – Battery energy storage systems’. Use this paragraph where a BESS proposal does not provide an adequate assessment of risk to water quality if the site drains to a surface waterbody in the event of a fire.

SWQ O 06 Unacceptable risk to water quality – Battery energy storage systems

Environment Agency position

We object to this application as submitted because the proposed development would pose an unacceptable risk of pollution to <surface> water quality and recommend that planning permission should be refused on this basis.

Reason(s)

Ensure reasons are site specific and related to planning policy. This can be provided as free text or based on the following prompts:

- Paragraph 187 of the National Planning Policy Framework states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of water pollution.*
- In addition, the [specify river basin] river basin management plan requires the restoration and enhancement of water bodies to prevent deterioration and promote recovery of water bodies.*

There is potential for pollution of the water environment due to abnormal and emergency situations at Battery Energy Storage System (BESS) developments, in particular fires. This would be exacerbated when in close proximity to surface waterbody/ies [insert relevant

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waterbody/ies and distance/pathways]. There is a risk that highly polluting chemicals in batteries could enter surface water in firewater or rainfall. Applicants should assess risks to water quality and ensure mitigation is in place to ensure containment of this water.

While in the event of a fire at a BESS, it is accepted best practice to let the containers on fire burn out, it is likely water will be used to cool neighbouring containers. This water could enter burning containers through surface run off or directly from spray cooling neighbouring containers. Furthermore, during or following a fire at a BESS development, water could enter exposed containers through rainfall during the period of time it takes to remove or cover burnt out containers.

Optional WFD justification: In this case we consider that the risk of potential harm to <surface> water quality posed by this proposed development is unacceptable.

The proposal would result in the discharge of pollutants to [insert name of relevant watercourse(s)] thereby risking failure to meet <statutory/non-statutory> water quality objectives for that water body. In particular, there is a risk that this proposal would <cause deterioration of a quality element to a lower status class and/or prevent the recovery of and/or cause deterioration of a protected area <refer to type, e.g. drinking water protected area>because it would:

- result in the release of priority hazardous substances [specify which priority hazardous substances] [refer to evidence from scheme and RBMP] <and/or>*
- [include other site specific evidence from the scheme and RBMP] The proposals submitted for the construction phase of the development and subsequent operational management, restoration and after care are inadequate to safeguard against the pollution of surface water.*

Overcoming our objection

If we are objecting in detail, with each reason for objection indicate how the applicant can overcome our objection, so the objection can be removed. This will ensure our responses promote the 'yes if' approach.

To overcome the objection a suitable mechanism for containing for surface water in the event of a fire should be included in the design of the development.

Condition - Mitigation for containment of surface water run off for Battery Energy Storage System developments

Use new condition:

SWQ C 04 'Drainage – scheme to be agreed for BESS development'

Please read: This is internal guidance that Environment Agency officers use when responding to consultations for advice on planning applications and pre-application enquiries. The guidance includes advisory considerations and does not represent a policy position. Government policy and guidance will always override any consideration in this guidance note where there is conflict between the two positions. This guidance can be shared with developers and the public, so they are aware of our considerations when consulted on developments including Battery Energy Storage Systems. It is intended that this guidance will be updated periodically. Officers are advised to check the date of the current version. This guidance does not prejudice any advice the Environment Agency may subsequently wish to provide when consulted on individual proposals. Each officer must use their professional judgment on a case-by-case basis.

Environment Agency position

The proposed development will be acceptable if the following measure(s) are implemented and secured by way of a planning condition on any planning permission.

Condition

The development hereby permitted shall not be commenced until such time as a scheme to [insert from list below] has been submitted to, and approved in writing by, the local planning authority. The scheme shall be implemented as approved.

- *dispose of surface water*
- *install oil and petrol separators*
- *seal roof drainage – at ground level*
- *[other requirements as necessary – write free-form].*

Reason(s)

Ensure reasons are site specific and related to planning policy.

The submitted planning application <includes/is for> Battery Energy Storage. Highly polluting chemicals in batteries could enter surface waterbodies in firewater or rainfall via surface water run off should battery containers become exposed in the event of a fire. Local planning authorities should ensure mitigation is in place to ensure containment of this water.

While in the event of a fire at a BESS, it is accepted best practice to let the containers on fire burn out, it is likely water will be used to cool neighbouring containers. This water could enter burning containers through surface water run off or directly from spray cooling neighbouring containers. Furthermore, during or following a fire at a BESS development, water could enter exposed containers through rainfall during the period of time it takes to remove or cover burnt out containers.

In light of the above, the proposed development will be acceptable if a planning condition securing adequate pollution prevention measures is included on any planning permission granted. Without this condition we would object to the proposal in line with paragraph 187 of the National Planning Policy Framework because it cannot be guaranteed that the development will not present unacceptable risks to groundwater resources.

Optional WFD justification: In this case we consider that the risk of potential harm to <surface> water quality posed by this proposed development is unacceptable.

In addition, the [specify river basin] river basin management plan requires the restoration and enhancement of water bodies to prevent deterioration and promote recovery of water bodies.

Without this condition, the impact <will/could > <cause deterioration of a quality element to a lower status class and/or prevent the recovery of and/or cause deterioration of a protected area [refer to type, e.g. drinking water protected area]> [insert name] water body because it would:

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- *result in the release of priority hazardous substances [specify which priority hazardous substances] [refer to evidence from scheme and RBMP] <and/or>*
- *[include other site specific evidence from the scheme and RBMP]*

Informative – General guidance for BESS developments

Use new multifunctional informative:

NMF I 08 General guidance for BESS developments

In line with [planning practice guidance](#):

- *Applicants are encouraged to engage with Local Fire & Rescue Services to ensure issues of siting and location of BESS are dealt with before applications are made. Ideally this should be done before submitting a planning application.*
- *Local planning authorities are encouraged to engage with Local Fire & Rescue Services and to refer to [guidance produced by the National Fire Chiefs Council](#) for consideration when determining applications.*
- *Applicants will also need to comply with relevant Building Regulations in [Part B](#). They require applicants to provide suitable access for the fire service.*

Applicants should also refer to guidance published by The Department for Energy Security and Net Zero: [Health and safety in grid scale electrical energy storage systems](#), which provides guidance on a number of topics related to health and safety including on 'Design and planning' that provides guidance on battery technology, site selection, site layout and emergency planning. It also includes a section on 'Decommissioning and end of life', including dealing with batteries that have come to the end of their use in the BESS.

Informative - Management of end of life industrial batteries

Use new waste informative:

WST I 10 Management of end of life industrial batteries

Battery energy storage systems (BESS) facilities are not regulated under the Environmental Permitting Regulations regime.

However, battery storage falls within the scope of the UK's producer responsibility regime for batteries and other waste legislation. This creates additional lifecycle liabilities which must be understood and factored into project costs.

Batteries have the potential to cause harm to the environment if stored inappropriately e.g. subject to a fire as the chemical contents escape from the casing. When a battery within a battery storage unit ceases to operate, it will need to be removed from site and dealt with in

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compliance with waste legislation. The party discarding the battery will have a waste duty of care under the Environmental Protection Act 1990 to ensure that this takes place.

The Waste Batteries and Accumulators Regulations 2009 also introduced a prohibition on the disposal of batteries to landfill and incineration. Batteries must be recycled or recovered by approved battery treatment operators or exported for treatment by approved battery exporters only.

Many types of batteries are classed as hazardous waste which creates additional requirements for storage and transport.

In occasional circumstances where full text is inappropriate this paragraph should be replaced with:

Battery storage systems fall within the scope of the UK's producer responsibility regime for batteries and other waste legislation. Operators' of battery storage facilities should be aware of the Producer Responsibility Regulations. When a battery within a battery storage unit ceases to operate, it will need to be removed from the site and dealt with in compliance with waste legislation. The party discarding the battery will have a waste duty of care under the Environmental Protection Act 1990 to ensure that this takes place. The Waste Batteries and Accumulators Regulations 2009 also apply.

Informative - Emergency response / contingency plan

Use new multifunctional informative:

NMF I 07 Emergency response / contingency plan for BESS developments

As such each site and each site operator which has a BESS installation should have emergency response/contingency plans which detail how those risks as above will be managed and environmental impacts prevented, reduced, removed or contained.

The Department for Energy Security and Net Zero: [Health and safety in grid scale electrical energy storage systems](#), provides guidance on emergency planning.

Any plan for each site must include the EA Incident Number 0800 80 70 60 for prompt operator reporting so that the EA can risk assess the incident and risk to the environment.

From: [Planning](#)
To: [Humberhead Solar](#)
Cc: [REDACTED]
[REDACTED] EN0110032 - Humberhead Solar Project
Date: 28 May 2026 11:36:17
Attachments: [REDACTED]

[REDACTED]

Dear Sir / Madam,

Thank you for your letter dated 27 May 2026 in relation to a Scoping Opinion for the proposed Humberhead Solar Project.

I am the Planning and Consents Officer for the Foss (2008) Internal Drainage Board and I will be the key contact for the Board for this project.

Generally

-

I can confirm that only the Cable Route Corridor falls within our district – this is around the Thornton Substation. The Humberhead Sites do not fall within our district.

The Board makes the distinction between “Board maintained watercourses” which are watercourses which the Board maintain under the Land Drainage Act 1991. There are then also ordinary watercourses (i.e. ones which the Board do not maintain) which are affected and which will require our consent for any works to the same.

Board’s Consent

-

Under the Land Drainage Act 1991 and the Boards’ byelaws, the Board’s prior written consent (outside of the planning process) is needed for:-

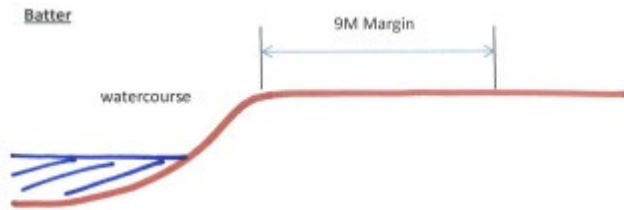
- a. any connection into a Board maintained watercourse, or any ordinary watercourse in the Board’s district.
- b. any discharge, or change in the rate of discharge, into a Board maintained watercourse, or any ordinary watercourse in the Board’s district.
- c. works within or over a Board maintained watercourse, or any ordinary watercourse in the Board’s district – for example, land drainage, an outfall structure, bridges, culverting etc.
- d. any new construction, buildings, structures, fences, walls, planting or hardstanding within 9 metres of the bank top of a Board maintained watercourse.

Works close to Board maintained watercourses

-

The Board’s prior written consent is required for any new buildings, structures, solar panels, fences, walls, planting or hardstanding within 9 metres of the top of the embankment of any

Board maintained watercourse as shown on the below diagram:



The Board would, generally, seek for there to be nothing new within 9 metres of the top of the embankment of the Board maintained watercourses so that the Board's machinery can go alongside the watercourse and carry out maintenance works to the watercourse. In addition, we want to ensure that there is nothing to destabilise the embankments of the watercourses. This easement should, generally, apply to both sides of the watercourses.

For underground cables, the Board would generally ask that this easement applies (or at least some sort of easement) in the event that the watercourse ever needed to be widened or if there was subsidence to the watercourse – this would avoid a cable being exposed.

The Board notes that Commitment D31 states that the applicant will, in general, keep a 10m easement measured from the bank top/water's edge. The Board would request this is from the **bank top** but otherwise the Board welcomes the applicant's approach.

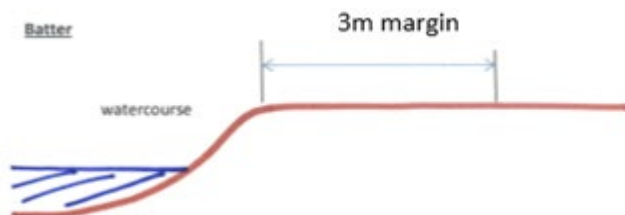
-

Works very close to the ordinary watercourses

-

The Board would ask that the applicant carries out a full investigation on site ascertaining where there are any open or culverted watercourses.

For any ordinary watercourses (i.e. ones which the Board do not maintain), the Board would request a minimum of 3 metres from the top of the embankment to be left completely clear of any new buildings, structures, solar panels, fences, walls, planting or hardstanding. An example of this 3-metre margin is shown below:



This is to ensure there is sufficient room for maintenance works to the watercourse by the riparian owner in the future. This easement should apply to both sides of the watercourse.

Again, the Board notes that Commitment D31 states that the applicant will, in general, keep a 10m easement measured from the bank top/water's edge. The Board would request this is from the **bank top** but otherwise the Board welcomes the applicant's approach.

Culverted Watercourses

-

For any culverted watercourses, the Board would generally request a minimum of 3 metres from the edge of the culvert to be left completely clear of any new buildings, structures, solar panels, other permanent obstruction, and new planting, unless agreed otherwise in writing with the Board.

This 3-metre easement is to ensure there is sufficient room for maintenance works to the culvert by the riparian owner in the future, and to try and prevent subsidence/movement. This easement should apply to both sides of the culvert.

The Board would recommend that a similar Commitment to that noted above is applied to any culverted watercourses also.

Underground Cables

If the applicant is proposing to insert a cable under/over/within a watercourse within the Board's district, the Board's prior written consent must be obtained. The Board would prefer for any cables crossing watercourses to be laid above any existing culverts so that they do not affect water flows and do not therefore, generally, require the Board's consent.

If this is not feasible, directional drilling should be used. We will not generally accept open cut crossings.

The Board notes Commitment D24 states that where practicable, trenchless cable crossing techniques will be prioritised. The principle of this is welcomed by the Board.

Conclusion

-

I hope the above assists the applicant and we are always happy to discuss further.

Kind regards,

[Redacted Signature]

Senior Planning Officer

Working Hours: Monday, Tuesday, Wednesday and Thursday – 8.45am to 2.15pm

If you would like to understand more about what Internal Drainage Boards do, we would recommend this short video - [Youtube Video on IDBs](#)



Airedale Drainage Commissioners
Ainsty (2008) Internal Drainage Board
Beverley & North Holderness Internal Drainage Board
Foss (2008) Internal Drainage Board
Ouse & Derwent Internal Drainage Board

Address: Derwent House | Crockey Hill | York | YO19 4SR

E-mail: planning@yorkconsort.gov.uk

Telephone: [REDACTED]

Website: <http://www.yorkconsort.gov.uk>

P please don't print this e-mail unless you really need to

This e-mail, together with any attachments, is confidential and is intended solely for the individual to whom it is addressed. The views expressed are that of the author and do not constitute or imply the endorsement or recommendation of the Drainage Board. If you are not the intended recipient please inform the sender immediately.

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From: [FPL - Conx Request](#)
To: [Humberhead Solar](#)
Subject: RE: EN0110032 Humberhead Solar project - EIA scoping notification
Date: 27 May 2026 17:03:35
Attachments: [image004.png](#)
[image005.png](#)
[9009502-proposal01-nan-rev01.pdf](#)
[9009502-proposal02-nan-rev01.pdf](#)
[9009502-aslaid01-nan-rev01.PNG](#)
[9009502-aslaid02-nan-rev01.PNG](#)

Hi,

We will do everything we can to assist you in your safe working procedures, however, it's worth bearing in mind that we are not responsible for any incidents or accidents that may occur whilst working around our pipe network.

With this in mind, we'd recommend the following practices are adhered to maintain the integrity of the pipeline:-

- ° Trial Holes to find our pipes.
- ° Hand Digging to find our pipes and their vicinity once found.
- ° Adequate protection of the pipe if exposed and once your work is completed i.e. sand covering.

It is essential to refer to the HSE document HS(G)47 for information regarding trial holes and safe digging practice when working near our pipes. Additional costs may be incurred if our plant has to be relocated due to your proposed works.

Please note that other gas transporters may have plant in the area which could be affected by your proposed works.

If you need any help or information simply contact Fulcrum on 03330 146 455

In case of an emergency please phone 0800 111 999.

Kind regards,



FPL - Conx Request

e: ConnectionRequest@fulcrum.co.uk | w: www.fulcrum.co.uk

a: Fulcrum, 4 Europa Court, Sheffield Business Park, Sheffield, S9 1XE, T: 03330 146 466

Tell us how we're doing:

We'd really appreciate feedback on your experience with us today. So, please tell us how we're doing by emailing feedback@fulcrum.co.uk

From: Humberhead Solar <humberheadsolar@planninginspectorate.gov.uk>

Sent: 27 May 2026 10:18

To: Humberhead Solar <humberheadsolar@planninginspectorate.gov.uk>

Subject: EN0110032 Humberhead Solar project - EIA scoping notification

THIS IS AN EXTERNAL MESSAGE - PLEASE EXERCISE CAUTION

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Sir/ Madam

Please see attached correspondence on the proposed Humberhead Solar project.

The applicant for the proposed development intends to make an application for Development Consent under the Planning Act 2008. The applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by 24 June 2026. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Fulcrum

Pipelines

Greasbrough Road

Rotherham

S61 4QQ

QUOTE REF: 9009502 (41776117)

SITE ADDRESS:
ALLERTHORPE BUSINESS PARK
YORK ROAD
POCKLINGTON
YORK
YO42 1NS

DESCRIPTION OF WORKS:
E 477903 N 448527 LAY LP MAIN
SERVICES

DESIGNED BY: VIN RUSHWORTH

SCALE: 1:1000 @ A3 DATE: 09/06/2010

DRAWING: PROPOSAL

DRAWING KEY:
LP Main
MP Main
IP Main
Proposed Service
Proposed Meter Position
Pipes To Be Abandoned

Change Of Diameter

Change Of Material

Governor

Valve

APPROVED

By Northern Gas Networks - Ref 300856509 at 10:24 am, Jan 04, 11

SCOPE OF WORKS
As per Table A10 of NGN/SP/NP/14 connect by means of a 125mm x 6" UPT to the existing 6" Spun Iron LP Main and lay 249mtrs x 125mm PE LP Main and 3 LP Services. Plot 4 to terminate internally with a 2" ECV and Plots 2 & 3 terminate internally with 1" ECV's. All services are to be fitted with fire valves. The services have been designed to comply with IGE/TD/4 and the mains comply with IGE/TD/3, All trenches on site are to be excavated backfilled and reinstated by the Developer

PLOT	MPRN
2	7678077803
3	7678077904
4	7678078008

APPROVED

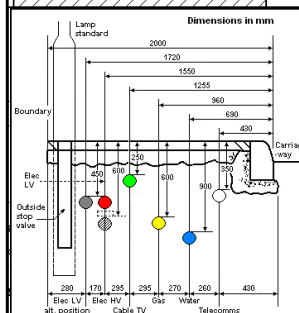
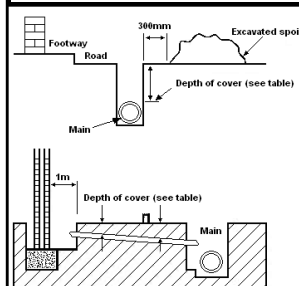
By FPL at 11:17 am, Jan 18, 11

9009502 (5026447)
Plot 2 Allerthorpe Business Park
York Road
York
YO42 1NS

APPROVED
By FPL at 8:45 am, Jun 09, 14

29.04.2014

ALL SERVICES LAID ON THIS PROJECT
COMPLY WITH THE LATEST EDITION OF
IGE / TD / 4



VERY IMPORTANT - INFORMATION FOR CUSTOMER

TRENCH DEPTH GUIDELINES

All trenches to be in accordance with N.J.U.G. guidelines

MINIMUM DEPTHS OF COVER:-
MAINS: (a) Carriageway - 750mm (b) Other ground - 600mm
SERVICES: (a) >63mm - As above (b) <=63mm - 450mm
*All pipes laid in agricultural land - 1.1m

All ducts (if used) must conform to BS4962, Yellow in colour, convoluted and perforated.

VERY IMPORTANT - INFORMATION FOR CUSTOMER

MINIMUM PROXIMITY DISTANCES

The permissible proximities to normally occupied buildings vary depending upon construction material and operating pressure show in the tables below

STEEL MAINS	
Operating Pressure	Minimum Proximity to Premises (m)
LP	0.25
MP	1
HP	3

PE MAINS		Maximum Operating Pressure	
O.D. (mm)	Material PE Grade	<=75mbar (LP)	>75mbar <=25bar (MP)
		Minimum Proximity to Premises (m)	
<=140	PE80 SDR17.6	0.25	3
	PE80 SDR11	0.25	3
	PE100 SDR11	0.25	3
	PE80 SDR17.6	1	3
160 to 250	PE80 SDR11	1	3
	PE100 SDR11	1	3
	PE80 SDR17.6	1	3
	PE80 SDR11	1	3
315	PE80 SDR17.6	1	3
	PE80 SDR11	1	3
	PE100 SDR11	1	3
	PE100 SDR11	1	3

SCALE BAR

1:200 0 metres 5 metres 10 metres 15 metres 20 metres 25 metres 30 metres 35 metres

MPRN's:

Plot 1 Phase 2 - 7679231309
Plot 2 Phase 2 - 7679231410

Centreline of trees.

Centreline of trees.

This drawing has been produced in accordance with the Building Regulations and/or Building Regulations in conjunction with, but not a substitute for, the Building Regulations. Any deviations from the Building Regulations are to be approved by the Building Control Department prior to construction. This drawing is the property of the Designer and is not to be reproduced without permission.

Existing trees to be fully protected during construction to prevent accidental damage from building operations.

PLOT 3

Unit 1
Refer Planning Application Reference 10/04913/PLF

Unit 2
Floor Area - 248 sq m

Unit 3
Floor Area - 248 sq m

Fire Valves

Connection point
E-477801 N-448538

Lay 2 new 32mm LP services, external meter locations with 1" ECV's/ U6 meters in semi concealed meter housing on small dwarf wall constructed by the customer.
Hourly load = 30kW/h Each Service.
Annual load = 1,000kW/h Each Service.

Existing 90mm LP PE

D GORMAN
FOR DETAILS
DEVELOPMENT.

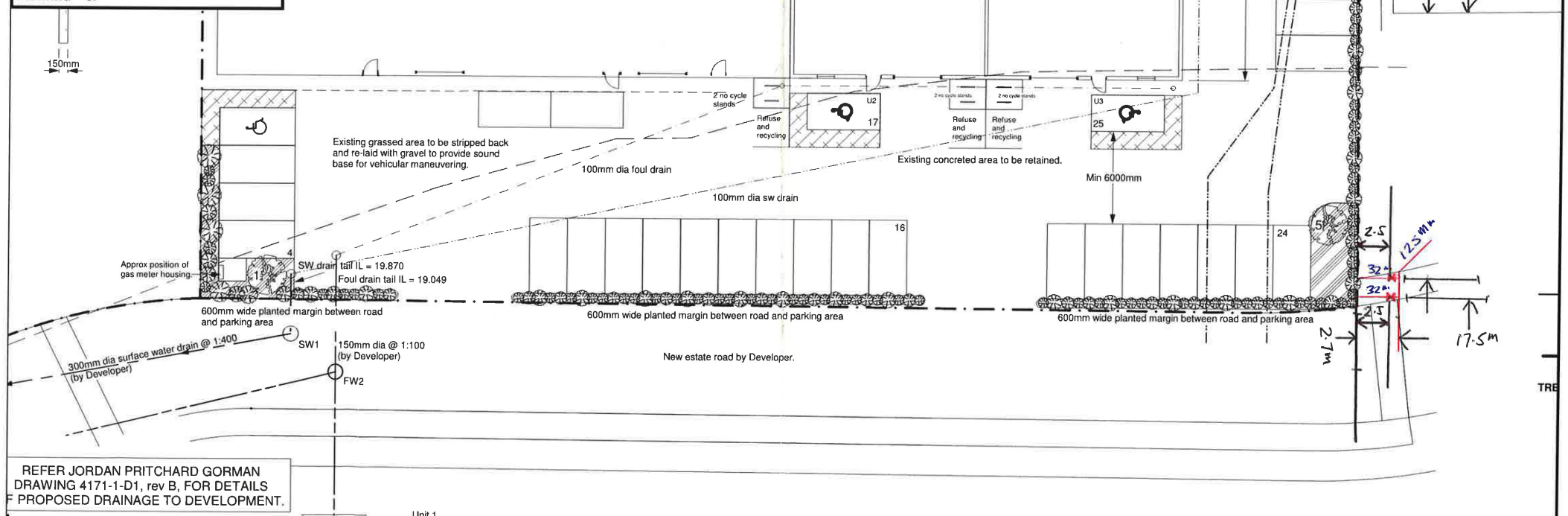
H:\Gas works Designs\5026477_mw702_Pad - Approximate Scale 1 mm = 0.500 metres

PROJECT REFERENCE:	5026447
DESIGNED BY:	Michael Wood
SITE ADDRESS:	Plot 2 Allerthorpe Business Park York Road York YO42 1NS

MAP/GRID REF:

DR8 REQ MAIN
WAS 125^{mm} NOT
90^{mm} AS STATED
ON PROPOSAL DRAWINGS

DRAWING of



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: humberheadsolar@planninginspectorate.gov.uk

Dear Ms Georgia Pathy (PINS)

Date: 10 June 2026

**PROPOSED HUMBERHEAD SOLAR (the project)
PROPOSAL BY HUMBERHEAD SOLAR LIMITED (the applicant)
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (as
amended) REGULATIONS 10 and 11**

Thank you for your letter of 27 May 2026 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?

The DCO boundary is shown in Figure 1-1 Site Location and Scoping Site Boundary, as shown within the [Environmental Impact Assessment Scoping Report](#) and the GIS files provided by email on 29/05/26 ("ScopingSiteBoundary.zip").

According to HSE's records, the proposed DCO application boundary for this Nationally Significant Infrastructure Project falls within the consultation zones of two major accident hazard sites:

- HSE Site Ref. H4962 - Air Liquide Advanced Business & Technologies UK Ltd, Park Farm AD Plant, Market Weighton Road, Holme-on-Spalding-Moor, York, YO43 4AG.
- HSE Site Ref. H4810 – Inztec Limited, Duck Nest Farm, Holme-On-Spalding-Moor, York, YO43 4EB.

The Applicant should make contact with the above site operators to inform an assessment of whether or not the proposed development is vulnerable to a possible major accident.

The proposed DCO application boundary for also falls within the consultation zones of one major accident hazard pipeline.

- HSE Ref. 9669 - Ineos Manufacturing (Hull) Limited, Teesside to Saltend Ethylene Pipeline.

The Applicant should contact the above pipeline operator to verify and inform an assessment of whether or not the proposed development is vulnerable to a possible major accident. There are three particular reasons for this:

- i) The pipeline operator may have a legal interest in developments in the vicinity of the pipeline. This may restrict developments within a certain proximity of the pipeline.
- ii) The standards to which the pipeline is designed and operated may restrict major traffic routes within a certain proximity of the pipeline. Consequently, there may be a need for the operator to modify the pipeline or its operation, if the development proceeds.
- iii) To establish the necessary measures required to alter/upgrade the pipeline to appropriate standards.

HSE's Land Use Planning advice [[HSE: Land use planning - HSE's land use planning methodology](#)] is dependent on the location of areas where people may be present within HSE's land-use planning zones. Based on the information in the [Environmental Impact Assessment \(EIA\) Scoping Report](#), May 2026, 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 \(EIA\) Scoping Report](#), May 2026, that there are hazardous materials which are likely to require Hazardous Substance Consent. This may be because there are no relevant hazardous substances.

Hazard classification of substances is relevant to the potential for accidents. 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 Part 4 of Schedule 1 for below-threshold substances.

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 in NSIPs is summarised in Advice Note 11 'working with public bodies in the infrastructure planning process' Annex G on the Planning Inspectorate's website [Nationally Significant Infrastructure Projects - Advice Note Eleven, Annex G: The Health and Safety Executive - GOV.UK \(www.gov.uk\)](#). This document includes consideration of risk assessments under the heading "Risk assessments".

In Chapter 14.7 of the [Environmental Impact Assessment \(EIA\) Scoping Report](#), May 2026, and [Appendix 14-A: Long List of Major Accidents and Disasters](#) some possible major accidents and disasters. With respect to nearby major accident hazard sites, only Yara UK Ltd. at Pilkington is mentioned in Appendix 14-A Industrial accidents. It is stated that ***"It is unlikely that an incident at Yara will lead to a MA&D at the Scheme via a domino effect or vice versa given the distance and the largely arable land in between which would be unlikely to propagate such an event"***. However as indicated in the first section of this report there are major accident sites and pipeline which are in closer proximity to the DCO boundary that should be considered.

We would advise this is considered further in line with Advice Note 11 Annex G taking account of the following: ***"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."*** Note that there are no requirements for any risk assessments submitted to and approved by the relevant planning authority, to also be considered by HSE.

Explosives sites

Explosives Inspectorate has no comment to make as there are no HSE licenced explosives sites in the vicinity of the proposed development.

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 Signature]

[Redacted Name]

CEMHD4 NSIP Consultation Team

Privacy Notice details

English

Privacy information

HSE staff will process your data as part of our work primarily for the purpose of inspections and investigations, interventions and assessments in support of law enforcement.

Please see <https://www.hse.gov.uk/help/privacy.htm> for more details.

Welsh

Gwybodaeth preifatrwydd

Bydd staff HSE yn prosesu'ch data fel rhan o'n gwaith yn bennaf at ddiben arolygiadau ac ymchwiliadau, ymyriadau ac asesiadau i gefnogi gorfodi'r gyfraith.

Gweler <https://www.hse.gov.uk/help/privacy.htm> am ragor o fanylion

Direct Dial: [REDACTED]

Our ref: [REDACTED]

PINS ref.: EN0110032

By email

Date: 19 June 2026

Dear Madam or Sir,

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

Proposed application by Humberhead Solar Limited (the applicant) for an Order granting Development Consent for Humberhead Solar (the proposed development)

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

Thank you for your communication of 27 May 2026 consulting Historic England on the above EIA Scoping Report.

The scheme is outlined in the Consultation Documents provided as a link to the documentation website online. The documents which the following comments refer to are:

- EN0110032 – Humberhead Solar – Environmental Impact Assessment – Scoping Report
- EN0110032 – Humberhead Solar – Environmental Impact Assessment – Scoping Report, Appendices
- EN0710008 – Humberhead Solar – Environmental Impact Assessment – Scoping Report, Figures Part 6: 10-1 and 10-2

In relation to Listed Buildings, the remit for detailed comments and advice on Grade II Listed Buildings largely lies with the relevant Local Authority Conservation Officers.

The remit for detailed comments and advice on non-designated archaeological remains largely lies with the relevant Local Authority Archaeological Advisors. However, our advice, includes comments on the submitted documents relating to the archaeological assessments and mitigation proposals, as well as suggestions of further detail we would expect to see presented in the Environmental Statement (ES) and Archaeological Mitigation Strategy.

Project summary

We understand the Proposed Development will comprise the construction, operation and decommissioning of a ground mounted solar photovoltaic electricity generating station and associated development, including a Battery Energy Storage System and infrastructure.

Historic England's Advice

Having reviewed the EIA Scoping Report and associated Figures, we note the principal infrastructure has the potential to have direct and indirect impacts on heritage assets.

These would include built heritage and buried archaeology of both designated and undesignated status.

General Points

We agree in general with the topics scoped in and out for the EIA in relation to the three phases: construction, operation and decommissioning.

In regard to heritage assets, we need to point out that a flexible approach to impact assessment and study areas would be welcomed in relation to results from surveys and evaluations during the preparation of the EIA.

Specific Points

Regarding the study area of 3km for designated heritage, we recommend a flexible and iterative approach to the assessment of the significance of heritage assets. This will allow to react to any changes in design to the draft Order Limits. We welcome the intention in the **Scoping Report, section 10.4.5** to consult us and other stakeholders regarding the consideration of designated heritage assets beyond the 3km study area. An iterative process of assessments and analysis will help to resolve any issues encountered during the pre-application phase.

The scheduled monuments of the Moated Site 170m of Wholsea Farm (NHLE 1015302), and the Grade II* listed Park and Garden of Londesborough Park (NHLE 1000924) are situated on the draft order limit boundary and need particular consideration regarding avoiding an impact on the significance of the monuments.

Viewpoints provided in the Appendix provide a good overview of the site and the landscape impacted on by the development. We are happy to advice the applicant on specific viewpoints required during the evaluation process for the impact on the significance of heritage assets resulting from a change regarding the setting of such assets.

We recommend including aerial investigation in the resource list for the proposed heritage DBA listed in **Section 20.7.11-13**, such as lidar data and the Historic England Aerial photograph explorer. Aerial resources have the potential to contribute to a better understanding of the wider landscape impact of the proposed development.

We agree with the general approach to elements of the proposed development scoped in and out in **table 10-3**.

Historic England is not mentioned as a consultee for the 'Additional Surveys' proposed in **section 10.7.16** and following sections. Historic England's science advisors are experts on geophysical surveys and can contribute to the best outcome for the historic environment impacted on by the development. We suggest that the applicant considers consulting Historic England in addition to the local authority, particularly as the results of surveys could reveal archaeological remains with an equivalent to nationally important heritage assets.

We would recommend scoping in a potential to enhance the heritage assets impacted on by the Proposed Development through improved interpretation or active community engagement. **Chapter 1.3 of the Scoping Report** provides a wide opportunities and consultations regarding 'Socio-Economics'. **Chapter 13.5.29 – 31** states various factors for Tourism to increase the public benefits of the wider region the proposed development will be embedded. However, it does not include the contribution the historic environment and heritage assets have to the tourism industry. It is beneficial for such projects to include considerations about the active involvement of the public in archaeological mitigation. **Section 13.3** states the intention to work with local authorities in this regard. In addition, Historic England would be happy to work with the applicant to provide examples and advice on public engagement for the wider benefit of the community.

If you have any queries about any of the above, or would like to discuss anything further, please contact me.

Yours sincerely

[Redacted Signature]

Inspector of Ancient Monuments

E-[Redacted Email]@historicengland.org.uk

From: [REDACTED]
To: [Humberhead Solar](#)
Subject: Environmental Statement (ES) and the scoping process
Date: 04 June 2026 09:32:53
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)

[REDACTED]

Good morning

In relation to the proposed Humberhead Solar ES, HFRS make the following comments, limited to the potential environmental effects arising from a fire and emergency response.

HFRS emphasises that fire events may result in significant environmental impacts, including:

- **Air quality:** release of toxic smoke and gases affecting nearby receptors
- **Water environment:** contamination from firefighting runoff
- **Soil contamination:** deposition of hazardous residues following fire

The Environmental Statement should robustly assess these effects, including, where appropriate, plume dispersion and firewater management.

Kind regards



[REDACTED]
[REDACTED]
Group Manager
East Riding District Manager
Humberside Fire and Rescue Service
[REDACTED]
[@humbersidefire.gov.uk](mailto:[REDACTED]@humbersidefire.gov.uk)



Submitted via email to: humberheadsolar@planninginspectorate.gov.uk

Date: 24th June 2026

Dear Sir/Madam,

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

Application by Humberhead Solar Limited (the Applicant) for an Order granting Development Consent for the Humberhead Solar Project (the Proposed Development)

I refer to your letter dated 27/05/2026 regarding the above proposed DCO. This is a response on behalf of National Gas Transmission PLC (NGT). Having reviewed the scoping consultation documents, NGT wishes to make the following comments regarding gas infrastructure which may be affected by proposals.

NGT has 1 feeder main located in proximity to the Order limits. Details of this infrastructure is as follows:

- Feeder Main – FM29 – Ganstead to Asselby
- Cathodic Protection Groundbeds/TR
- Ancillary apparatus

Please note that NGT has existing rights for these pipelines which provides rights for ongoing access and prevents the erection of permanent / temporary buildings / structures, change to existing ground levels or storage of materials etc within the easement strip.

Where the Promoter intends to acquire land, extinguish rights, or interfere with any of NGT's apparatus, NGT will require appropriate protection and further discussion on the impact to its apparatus and rights including adequate Protective Provisions. A Deed of Consent will also be required for any works proposed within the easement strip.

General Pipeline Information

NGT requires its pipelines remain accessible during and after completion of any works. Some work types have specific restrictions when being undertaken in the vicinity of gas assets, therefore, early consultation with NGT is essential.

General information Promoters should be aware of is contained in *UKOPA GPG/042 - Guidance on the Issues to be Considered by Promoters, Designers and Planners of New Developments in the Vicinity of High Pressure Pipelines* [Good Practice Guide](#).

Our pipelines are normally buried to a depth cover of 1.1 metres, however actual depth and position must be confirmed on site by trial hole investigation under the supervision of an NGT representative. Ground cover above our pipelines should not be reduced or increased. Further guidance around working safely may be sought from NGT and additional specifications provided where required.

Any works within the vicinity of NGT's pipelines must adhere to the safe working requirements set out in [T/SP/SSW/22](#).

If any excavations are planned within a pipeline's easement, or within 10 metres (whichever is higher), or within 10 metres of an Above Ground Installation (AGI), or if any embankment or dredging works are proposed, then the actual position and depth of the pipeline must be established on site in the presence of a NGT representative. A safe working method must be agreed prior to any work taking place to minimise the risk of damage and ensure the final depth of cover does not affect the integrity of the pipeline.

Any large installations which may result in a population increase in the vicinity of a high pressure gas pipeline must comply with the HSE's Land Use Planning (LUP) methodology, and the HSE response should be submitted to NGT for review. NGT will typically support the HSE's advice, however, the HSE's LUP methodology differs from IGEM risk assessment methodology and as such, the pipeline operating conditions / specifications and the formation of a population cluster and / or increased population density near the pipeline as a result of development, may provide sufficient reasons on safety grounds for NGT to request that the Promoter / Developer conducts a risk assessment in form of a Quantitative Risk Assessment (QRA). The QRA must be completed by a specialist company approved to carry out these assessments for NGT.

Solar Farms / BESS

There is specific criteria that must be adhered to for developing electrical infrastructure near NGT's gas pipelines to avoid unacceptable levels of interference.

Information Promoters should be aware of is contained in *UKOPA/GP/014 Requirements for the Siting and Installation of Solar Photovoltaic (PV)* and *UKOPA/GPG/031 DC Interference Guidelines*.

Subject to compliance with the acceptable interference criteria in the standards, the installation can be built adjacent to pipelines but never within the easement. It is possible that the pipelines are already experiencing acceptable levels of interference, and in such cases the level of acceptance for new constructions shall be restricted to levels that do not raise the existing levels beyond the acceptable levels defined in the standards.

Utility crossings over NGT's pipelines are restricted and require formal written permission in the form of a Deed of Consent before any installation / construction within the pipeline easement is permitted.

The Promoter is to engage with NGT for further guidance in the early stages of design to ensure the required integrity assessments are agreed, and consideration has been given to electrical interference, security, crossing points, future access and safe construction methods, all of which must be mutually agreed prior to undertaking any works on site.

Yours faithfully,



DCO Liaison Officer

██████████
Lead Development Liaison Officer
██████████
██████████

██████████
Development Liaison Support Officer
██████████
██████████²

Customer Connections Site Solutions (CCSS)
Land, Planning and External Affairs (LPEA)
National Grid Electricity Transmission (NGET)
www.nationalgrid.com

SUBMITTED ELECTRONICALLY:
humberheadsolar@planninginspectorate.gov.uk

24 June 2026

Dear Sir/Madam

RE: APPLICATION BY Humberhead Solar Limited (THE APPLICANT) FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE Humberhead Solar (THE PROPOSED DEVELOPMENT)

SCOPING CONSULTATION RESPONSE

We refer to your letter dated 27th May 2026 in relation to the above proposed application. This is a response on behalf of National Grid Electricity Transmission PLC (NGET).

Having reviewed the scoping report, I would like to make the following comments regarding NGET existing or future infrastructure in close proximity to the current red line boundary.

NGET has high voltage electricity substations and overhead transmission lines within close proximity the scoping area. The overhead lines form an essential part of the electricity transmission network in England and Wales.

Existing Infrastructure

Overhead Lines

4ZR ROUTE 400kV

CREYKE BECK - THORNTON 1
CREYKE BECK - THORNTON 2

4VC ROUTE 400kV

DRAX - THORNTON 1
DRAX - THORNTON 2

We enclose a plan showing the location of NGET's apparatus in the scoping area.

In addition, GIS shapefiles of approximate locations of our national electricity transmission network are freely available from here: <https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/network-route-maps>. You can also check if your works will affect our transmission network by using the Line search website: <https://lsbud.co.uk/>.

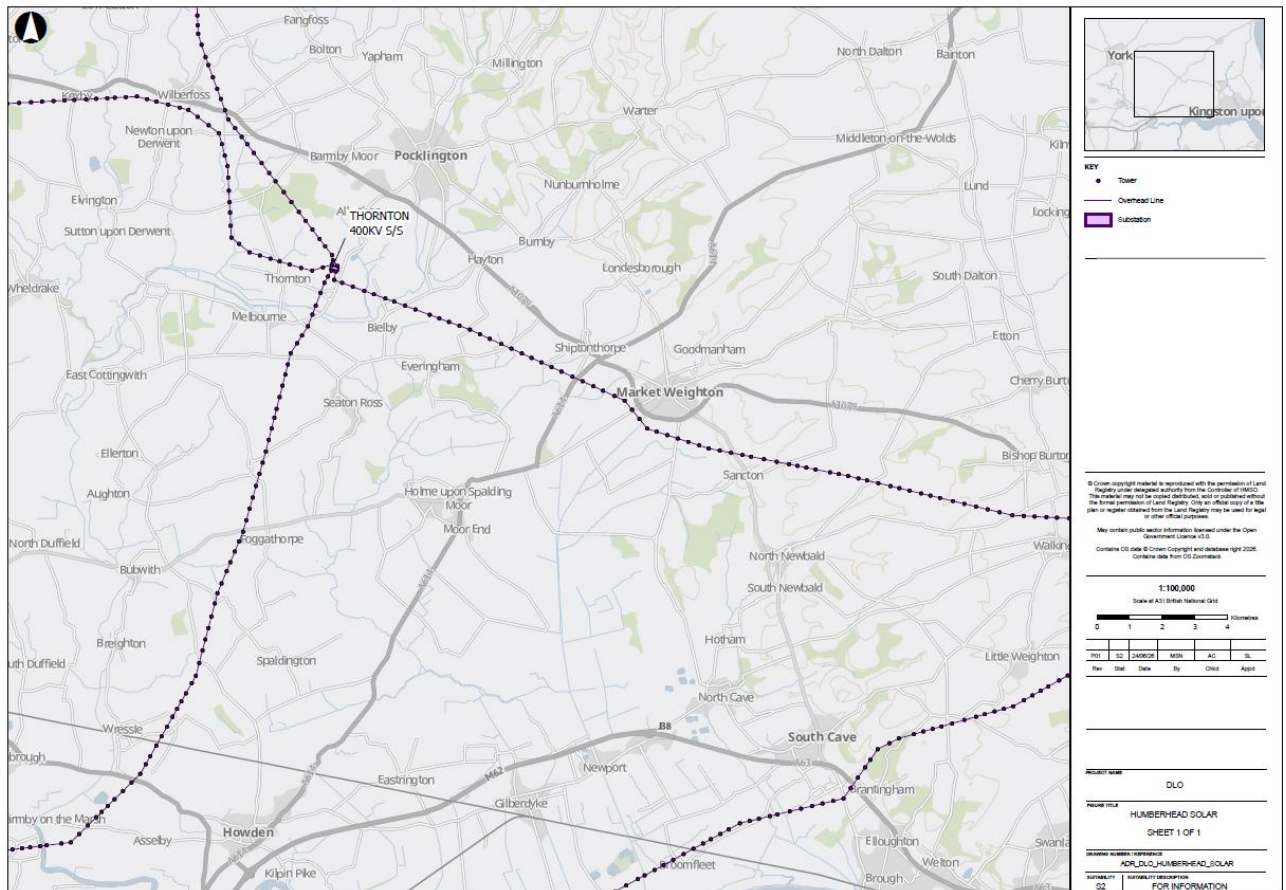


Figure 1: NGET Assets in proposed development area

New infrastructure

The National Energy System Operator (NESO) took over the electricity network planning responsibility from National Grid Electricity System Operator Limited (NGESO) on the 1st October 2024. Please consult with NESO separately from NGET where further information on the strategic need or capacity is sought.

Please refer to the Holistic Network Design (HND) and the NESO website to view the strategic vision for the UK's ever growing electricity transmission network: <https://www.neso.energy/publications/beyond-2030/holistic-network-design-offshore-wind>; and <https://www.neso.energy/publications/beyond-2030>

Onshore Infrastructure

Eastern Green Link 2 (EGL2)

EGL2 is a 505km electricity superhighway which will enable the transfer of power from Scotland to England (and vice versa) via a subsea cable. This two-gigawatt high voltage direct current (HVDC) cable is connecting Peterhead in Aberdeenshire and Drax in North Yorkshire and once operational, will carry enough electricity to power two million homes.

EGL2 will scale up the UK's capacity to transport home-produced clean energy, predominantly from offshore wind, from where it is generated to where there is demand. By doing so it will increase the security, resilience, and stability of the UK's transmission network.

At an investment of over £4bn, EGL2 is the largest ever single investment in the UK transmission system and will play a critical role in delivering the UK and Scottish governments' clean power and energy security targets, supporting thousands of jobs across the country and boosting local and national economies.

This project is a major step forward in delivering the reliability and security of the UK's home-grown energy supply and will provide greater flexibility to balance electricity demand and supply, enhance energy resilience, and help us to future-proof the network against rising energy needs.

EGL2 is being delivered as a joint venture between SSN Transmission and National Grid Electricity Transmission (NGET). NGET owns and manages the electricity transmission network in England and Wales, and SSN Transmission does the same in the north of Scotland. The two connection points of EGL2 fall within these operating areas.

Following final approval from Ofgem in August 2024, construction for EGL2 is now underway and the project is due to be operational in 2029.

For EGL2 southern onshore works we are building:

- Approximately 436km of subsea cabling from Sandford Bay, Peterhead in Aberdeenshire to Fraisthorpe Sands, near Bridlington in the East Riding of Yorkshire
- Approximately 68km of underground cabling from Fraisthorpe to a converter station in Drax, North Yorkshire
- Wren Hall Converter Station in Drax
- Wider works:
 - Peterhead Substation works – new bay in the existing substation
 - Drax Substation works – new bay in the existing substation
 - New 400kV cable system on the existing Drax to Eggborough Circuit
 - New 400kV cable system southwards from Drax, terminating near Fenwick

It should be noted that there may be further interactions with additional new strategic infrastructure where the projects are in their early development.

NGET requests that all existing and future assets are given due consideration given their criticality to the high-voltage transmission of electricity across the UK. We remain committed to working with the promoter in a proactive manner, enabling both parties to deliver successful projects wherever reasonably possible. As such we encourage that ongoing discussion and consultation between both parties is maintained on interactions with existing or future assets, land interests, connections or consents and any other NGET interests which have the potential to be impacted prior to submission of the Proposed DCO.

The Great Grid Upgrade is the largest overhaul of the electricity grid in generations, we are in the middle of a transformation, with the energy we use increasingly coming from cleaner greener sources. Our infrastructure projects across England and Wales are helping to connect more renewable energy to homes and businesses. To find out more about our current projects please refer to our network and infrastructure webpage. <https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects>. Where it has been identified that your project interacts with or is in close proximity to one of NGET's infrastructure projects, we would welcome further discussion at the earliest opportunity.

These projects are all essential to increase the overall network capability to connect the numerous new offshore wind farms that are being developed, and transport new clean green energy to the homes and businesses where it is needed.

The following points should be taken into consideration.

Specific Comments – Electricity Infrastructure:

- NGET's Overhead Line/s is protected by a Deed of Easement/Wayleave Agreement which provides full right of access to retain, maintain, repair and inspect our asset
- Statutory electrical safety clearances must be maintained at all times. Any proposed buildings must not be closer than 5.3m to the lowest conductor. NGET recommends that no permanent structures are built directly beneath overhead lines. These distances are set out in EN 43 – 8 Technical Specification for "overhead line clearances Issue 5 (2019)".

- If any changes in ground levels are proposed either beneath or in close proximity to our existing overhead lines, then this would serve to reduce the safety clearances for such overhead lines. Safe clearances for existing overhead lines must be maintained in all circumstances.
- The relevant guidance in relation to working safely near to existing overhead lines is contained within the Health and Safety Executive's (www.hse.gov.uk) Guidance Note GS 6 "Avoidance of Danger from Overhead Electric Lines" and all relevant site staff should make sure that they are both aware of and understand this guidance.
- Plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors. When those conductors are under their worst conditions of maximum "sag" and "swing" and overhead line profile (maximum "sag" and "swing") drawings should be obtained using the contact details above.
- If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.
- Drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations or "pillars of support" of any existing tower. These foundations always extend beyond the base area of the existing tower and foundation ("pillar of support") drawings can be obtained using the contact details above.
- NGET high voltage underground cables are protected by a Deed of Grant; Easement; Wayleave Agreement or the provisions of the New Roads and Street Works Act. These provisions provide NGET full right of access to retain, maintain, repair and inspect our assets. Hence, we require that no permanent / temporary structures are to be built over our cables or within the easement strip. Any such proposals should be discussed and agreed with NGET prior to any works taking place.
- Ground levels above our cables must not be altered in any way. Any alterations to the depth of our cables will subsequently alter the rating of the circuit and can compromise the reliability, efficiency and safety of our electricity network and requires consultation with National Grid prior to any such changes in both level and construction being implemented.

Further Advice

NGET requests to be consulted at the earliest stages to ensure that the most appropriate protective provisions are included within the DCO application to safeguard the integrity of our apparatus and to remove the requirement for objection. All consultations should be sent to the following email address: box.landandacquisitions@nationalgrid.com

We hope the above information is useful. If you require any further information, please do not hesitate to contact the Land Development Liaison team. In the meantime, we look forward to receipt of further information and consultation relating to potential impacts on our assets.

The information in this letter is provided notwithstanding any discussions taking place in relation to connections with electricity customer services.

Yours faithfully,

Lead Development Liaison Officer
Customer Connections Site Solutions (CCSS)
Land, Planning and External Affairs (LPEA)

Development Liaison Support Officer
Customer Connections Site Solutions (CCSS)
Land, Planning and External Affairs (LPEA)

Technical Guidance Note 287

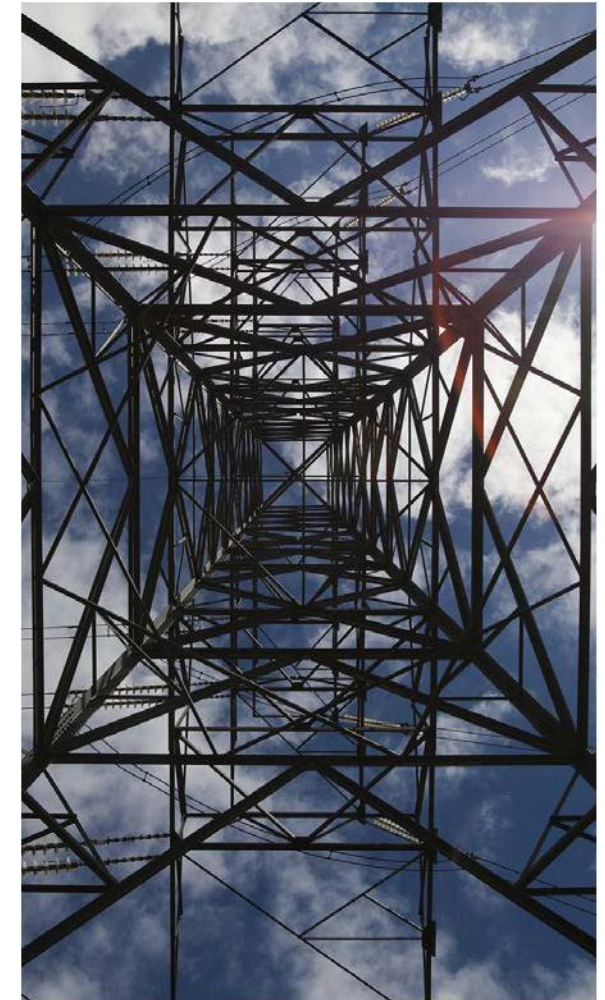
Third-party guidance for working near National Grid Electricity Transmission equipment

nationalgrid





Purpose and scope	3	Risk of impact identification	6
Contact National Grid	3	Risks or hazards to be aware of	7
How to identify specific National Grid sites.....	3	Land and access	7
Plant protection.....	3	Electrical clearance from overhead lines.....	7
Emergencies.....	3	Underground cables.....	8
 Part 1 – Electricity Transmission		Impressed voltage	8
infrastructure	4	Earth potential rise.....	9
Overhead lines.....	4	Noise	9
Underground cables.....	4	Maintenance access	9
Substations	4	Fires and firefighting.....	10
 Part 2 – Statutory requirements for		Excavations, piling or tunnelling	10
working near high-voltage electricity	4	Microshocks.....	10
Electrical safety clearances	4	Specific development guidance	11
Your Responsibilities – Overhead Lines.....	5	Wind farms	11
 Part 3 – What National Grid will do for		Commercial and housing developments	11
you and your development	6	Solar farms.....	12
Provision of information	6	Asset protection agreements	13
Drawings.....	6	Contact details	13
		Emergency situations	13
		Routine enquiries	13
		Appendix A OHL Profile Drawing Guide	14
		Appendix B OHL Tower Stand Off &	
		Reconductoring Area	15



Disclaimer

National Grid Gas Transmission and National Grid Electricity Transmission or their agents, servants or contractors do not accept any liability for any losses arising under or in connection with this information. This limit on liability applies to all and any claims in contract, tort (including negligence), misrepresentation (excluding fraudulent misrepresentation), breach of statutory duty or otherwise. This limit on liability does not exclude or restrict liability where prohibited by the law, nor does it supersede the express terms of any related agreements.



Purpose and scope

The purpose of this document is to give guidance and information to third parties who are proposing, scheduling or designing developments close to National Grid Electricity Transmission assets.

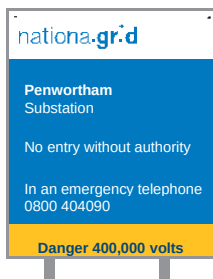
The scope of the report covers information on basic safety and the location of our assets – and also highlights key issues around particular types of development and risk areas.

In the case of electrical assets, National Grid does not authorise or agree safe systems of work with developers and contractors. However, we will advise on issues such as electrical safety clearances and the location of towers and cables. We also work with developers to minimise the impact of any National Grid assets that are nearby.

How to identify specific National Grid sites

Substations

The name of the Substation and emergency contact number will be on the site sign.



Overhead Lines

The reference number of the tower and the emergency contact number will be on this type of sign.



Contact National Grid

Plant protection

For routine enquiries regarding planned or scheduled works, contact the Asset Protection team online, by email or phone.

www.lsbud.co.uk

Email: assetprotection@nationalgrid.com

Phone: 0800 001 4282

Emergencies

In the event of occurrences such as a cable strike, coming into contact with an overhead line conductor or identifying any hazards or problems with National Grid's equipment, phone our emergency number 0800 404 090 (option 1).

If you have apparatus within 30m of a National Grid asset, please ensure that the emergency number is included in your site's emergency procedures.

Consider safety

Consider the hazards identified in this document when working near electrical equipment



Part 1

Electricity transmission infrastructure

National Grid owns and maintains the high-voltage electricity transmission network in England and Wales (Scotland has its own networks). It's responsible for balancing supply with demand on a minute-by-minute basis across the network.

Overhead lines

Overhead lines consist of two main parts – pylons (also called towers) and conductors (or wires). Pylons are typically steel lattice structures mounted on concrete foundations. A pylon's design can vary due to factors such as voltage, conductor type and the strength of structure required.

Conductors, which are the 'live' part of the overhead line, hang from pylons on insulators. Conductors come in several different designs depending on the amount of power that is transmitted on the circuit.

In addition to the two main components, some Overhead Line Routes carry a Fibre Optic cable between the towers with an final underground connection to the Substations.

In most cases, National Grid's overhead lines operate at 275kV or 400kV.

Underground cables

Underground cables are a growing feature of National Grid's network. They consist of a conducting core surrounded by layers of insulation and armour. Cables can be laid in the road, across open land or in tunnels. They operate at a range of voltages, up to 400kV.

Substations

Substations are found at points on the network where circuits come together or where a rise or fall in voltage is required. Transmission substations tend to be large facilities containing equipment such as power transformers, circuit breakers, reactors and capacitors. In addition Diesel generators and compressed air systems can be located there.

Part 2

Statutory requirements for working near high-voltage electricity

The legal framework that regulates electrical safety in the UK is *The Electricity Safety, Quality and Continuity Regulations (ESQCR) 2002*. This also details the minimum electrical safety clearances, which are used as a basis for the Energy Networks Association (ENA) TS 43-8. These standards have been agreed by CENELEC (European Committee for Electrotechnical Standardisation) and also form part of the *British Standard BS EN 50341-1:2012 Overhead Electrical Lines exceeding AC 1kV*. All electricity companies are bound by these rules, standards and technical specifications. They are required to uphold them by their operator's licence.

Electrical safety clearances

It is essential that a safe distance is kept between the exposed conductors and people and objects when working near National Grid's electrical assets. A person does not have to touch an exposed conductor to get a life-threatening

electric shock. At the voltages National Grid operates at, it is possible for electricity to jump up to several metres from an exposed conductor and kill or cause serious injury to anyone who is nearby. For this reason, there are several legal requirements and safety standards that must be met.

Any breach of legal safety clearances will be enforced in the courts. This can and has resulted in the removal of an infringement, which is normally at the cost of the developer or whoever caused it to be there. Breaching safety clearances, even temporarily, risks a serious incident that could cause serious injury or death.

National Grid will, on request, advise planning authorities, developers or third parties on any safety clearances and associated issues. We can supply detailed drawings of all our overhead line assets marked up with relevant safe areas.



« [Section continued from previous page](#)

Your Responsibilities - Overhead lines

Work which takes place near overhead power lines carries a significant risk of coming into proximity with the wires. If any person, object or material gets too close to the wires, electricity could 'flashover' and be conducted to earth, causing death or serious injury. You do not need to touch the wires for this to happen. The law requires that work is carried out in close proximity to live overhead power lines only when there is no alternative, and only when the risks are acceptable and can be properly controlled. Statutory clearances exist which must be maintained, as prescribed by the Electricity Safety, Quality and Continuity Regulations 2002.

Under the Health and Safety at Work etc. Act 1974 and Management of Health and Safety at Work Regulations 1999, you are responsible for preparing a suitable and sufficient risk assessment and safe systems of work, to ensure that risks are managed properly and the safety of your workforce and others is maintained. Your risk assessment must consider and manage all of the significant risks and put in place suitable precautions/controls in order to manage the work safely. You are also responsible for ensuring that the precautions identified are properly implemented and stay in place throughout the work.

Work near overhead power lines must always be conducted in accordance with GS6, 'avoiding danger from overhead power lines', and any legislation which is relevant to the work you are completing.

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What National Grid will provide

National Grid can supply profile drawings in PDF and CAD format showing tower locations and relevant clearances to assist you in the risk assessment process.

What National Grid will not provide

National Grid will not approve safe systems of work or approve design proposals

Part 3

What National Grid will do for you and your development

Provision of information

National Grid should be notified during the planning stage of any works or developments taking place near our electrical assets, ideally a minimum notification period of 8 weeks to allow National Grid to provide the following services:

Drawings

National Grid will provide relevant drawings of overhead lines or underground cables to make sure the presence and location of our services are known. Once a third party or developer has contacted us, we will supply the drawings for free.

400kV

The maximum nominal voltage of the underground cables in National Grid's network

Risk or impact identification

National Grid can help identify any hazards or risks that the presence of our assets might bring to any works or developments. This includes both the risk to safety from high-voltage electricity and longer-term issues, such as induced currents, noise and maintenance access that may affect the outcome of the development. National Grid will not authorise specific working procedures, but we can provide advice on best practice.





Risks or hazards to be aware of

This section includes a brief description of some of the hazards and issues that a third party or developer might face when working or developing close to our electrical infrastructure.

Land and access

National Grid has land rights in place with landowners and occupiers, which cover our existing overhead lines and underground cable network. These agreements, together with legislation set out under the *Electricity Act 1989*, allow us to access our assets to maintain, repair and renew them. The agreements also lay down restrictions and covenants to protect the integrity of our assets and meet safety regulations. Anyone proposing a development close to our assets should carefully examine these agreements.

Our agreements often affect land both inside and outside the immediate vicinity of an asset. Rights will include the provision of access, along with restrictions that ban the development of land through building, changing levels, planting and other operations. Anyone looking to develop close to our assets must consult with National Grid first.

For further information, contact Asset Protection:

Email: assetprotection@nationalgrid.com
Phone: 0800 001 4282

Electrical clearance from overhead lines

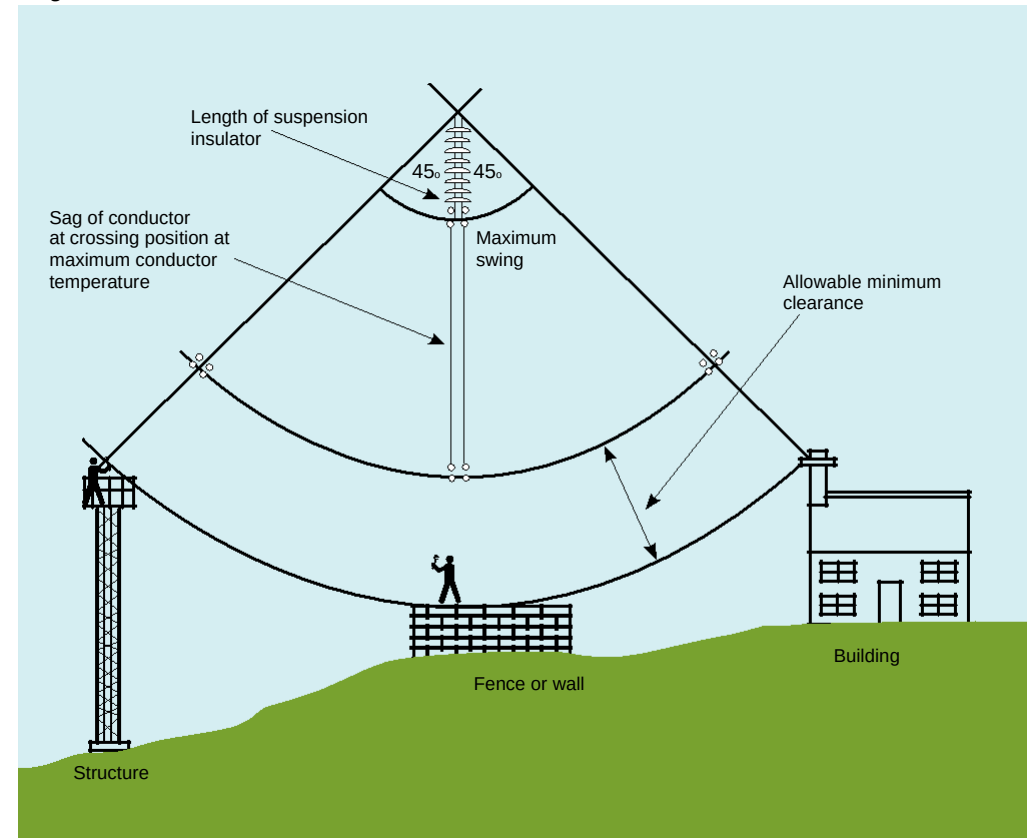
The clearance distances referred to in this section are specific to 400kV overhead lines. National Grid can advise on the distances required around different voltages i.e. 132kV and 275kV.

As we explained earlier, *Electrical Networks Association TS 43-8* details the legal clearances to our overhead lines. The minimum clearance between the conductors of an overhead line and the ground is 7.3m at maximum sag. The sag is the vertical distance between the wire's highest and lowest point. Certain conditions, such as power flow, wind speed and air temperature can cause conductors to move and allowances should be made for this.

The required clearance from the point where a person can stand to the conductors is 5.3m. To be clear, this means there should be at least 5.3m from where someone could stand on any structure (i.e. mobile and construction equipment) to the conductors. Available clearances will be assessed by National Grid on an individual basis.

National Grid expects third parties to implement a safe system of work whenever they are near Overhead Lines.

Diagram not to scale



There should be at least 5.3m between the conductors and any structure someone could stand on

We recommend that guidance such as *HSE Guidance Note GS6 (Avoiding Danger from Overhead Power Lines)* is followed, which provides advice on how to avoid danger from all overhead lines, at all voltages. If you are carrying out work near overhead lines you must contact National Grid, who will provide the relevant profile drawings.

7.3m

The required minimum clearance between the conductors of an overhead line, at maximum sag, and the ground

Section continues on next page »



The undergrounding of electricity cables at Ross-on-Wye

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Underground cables Underground cables operating at up to 400kV are a significant part of the National Grid Electricity Transmission network. When your works will involve any ground disturbance it is expected that a safe system of work is put in place and that you follow guidance such as *HSG 47 (Avoiding Danger from Underground Services)*.

You must contact National Grid to find out if there are any underground cables near your proposed works. If there are, we will provide cable profiles and location drawings and, if required, on-site supervision of the works. Cables can be laid under roads or across industrial or agricultural land. They can even be laid in canal towpaths and other areas that you would not expect.

Cables crossing any National Grid high-voltage (HV) cables directly buried in the ground are required to maintain a minimum separation that will be determined by National Grid on a case-by-case basis. National Grid will need to do a rating study on the existing cable to work out if there are any adverse effects on either cable rating. We will only allow a cable to cross such an area once we know the results of the re-rating. As a result, the clearance distance may need to be increased or alternative methods of crossing found.

For other cables and services crossing the path of our HV cables, National Grid will need confirmation that published standards and clearances are met.

Impressed voltage

Any conducting materials installed near high-voltage equipment could be raised to an elevated voltage compared to the local earth, even when there is no direct contact with the high-voltage equipment. These impressed voltages are caused by inductive or capacitive coupling between the high-voltage equipment and nearby conducting materials and can occur at distances of several metres away from the

equipment. Impressed voltages may damage your equipment and could potentially injure people and animals, depending on their severity. Third parties should take impressed voltages into account during the early stages and initial design of any development, ensuring that all structures and equipment are adequately earthed at all times.

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next page »

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Earth potential rise

Under certain system fault conditions – and during lightning storms – a rise in the earth potential from the base of an overhead line tower or substation is possible. This is a rare phenomenon that occurs when large amounts of electricity enter the earth. This can pose a serious hazard to people or equipment that are close by.

We advise that developments and works are not carried out close to our tower bases, particularly during lightning storms.

Noise

Noise is a by-product of National Grid's operations and is carefully assessed during the planning and construction of any of our equipment. Developers should consider the noise emitted from National Grid's sites or overhead lines when planning any developments, particularly housing. Low-frequency hum from substations can, in some circumstances, be heard up to 1km or more from the site, so it is essential that developers find adequate solutions for this in their design. Further information about likely noise levels can be provided by National Grid.

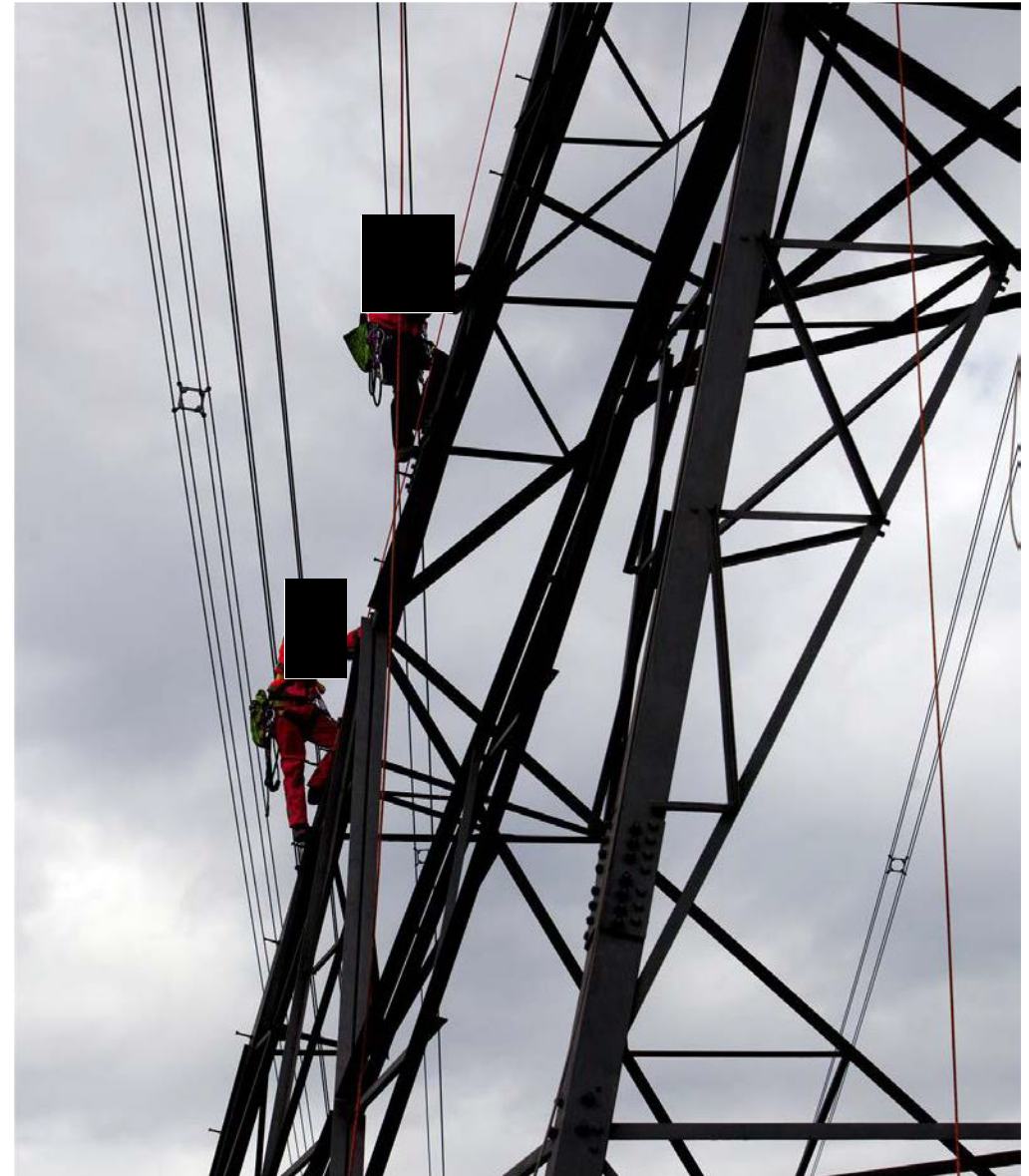
Maintenance access

National Grid needs to have safe access for vehicles around its assets and work that restricts this will not be allowed. In terms of our overhead lines, we wouldn't want to see any excavations made, or permanent structures built, that might affect the foundations of our towers. The size of the foundations around a tower base depends on the type of tower that is built there. If you wish to carry out works within 30m of the tower base, contact National Grid for more information. Our business has to maintain access routes to tower bases with land owners. For that reason, a route wide enough for an HGV must be permanently available. We may need to access our sites, towers, conductors and underground cables at short notice.

30m

If you wish to carry out work within this distance of the tower base, you must contact National Grid for more information

Section continues on next page »





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previous page

Fires and firefighting

National Grid does not recommend that any type of flammable material is stored under overhead lines. Developers should be aware that in certain cases the local fire authority will not use water hoses to put out a fire if there are live, high-voltage conductors within 30m of the seat of the fire (*as outlined in ENA TS 43-8*).

In these situations, National Grid would have to be notified and reconfigure the system – to allow staff to switch out the overhead line – before any firefighting could take place. This could take several hours.

We recommend that any site which has a specific hazard relating to fire or flammable material should include National Grid's emergency contact details (found at the beginning and end of this document) in its fire plan information, so any incidents can be reported.

Developers should also make sure their insurance cover takes into account the challenge of putting out fires near our overhead lines.

Excavations, piling or tunnelling

You must inform National Grid of any works that have the potential to disturb the foundations of our substations or overhead line towers. This will have to be assessed by National Grid engineers before any work begins.

BS ISO 4866:2010 states that a minimum distance of 200m should be maintained when carrying out quarry blasting near our assets. However, this can be reduced with specific site surveys and changes to the maximum instantaneous charge (the amount of explosive detonated at a particular time).

All activities should observe guidance layed out in *BS 5228-2:2009*.

Microshocks

High-voltage overhead power lines produce an electric field. Any person or object inside this field that isn't earthed picks up an electrical charge. When two conducting objects – one that is grounded and one that isn't – touch, the charge can equalise and cause a small shock, known as a microshock. While they are not harmful, they can be disturbing for the person or animal that suffers the shock.

For these reasons, metal-framed and metal-clad buildings which are close to existing overhead lines should be earthed to minimise the risk of microshocks. Anything that isn't earthed, is conductive and sits close to the lines is likely to pick up a charge. Items such as deer fences, metal palisade fencing, chain-link fences and metal gates underneath overhead lines all need to be earthed.

For further information on microshocks please visit www.emfs.info.



200m

*The minimum distance that
should be maintained from
National Grid assets when
quarry blasting*

Specific development guidance

Wind farms

National Grid's policy towards wind farm development is closely connected to the *Electricity Networks Association Engineering Recommendation L44 Separation between Wind Turbines and Overhead Lines, Principles of Good Practice*. The advice is based on national guidelines and global research. It may be adjusted to suit specific local applications.

There are two main criteria in the document:

- (i) The turbine shall be far enough away to avoid the possibility of toppling onto the overhead line
- (ii) The turbine shall be far enough away to avoid damage to the overhead line from downward wake effects, also known as turbulence

The toppling distance is the minimum horizontal distance between the worst-case pivot point of the wind turbine and the conductors hanging in still air. It is the greater of:

- the tip height of the turbine plus 10%
- or, the tip height of the turbine plus the electrical safety distance that applies to the voltage of the overhead line.

To minimise the downward wake effect on an overhead line, the wind turbine should be three times the rotor distance away from the centre of the overhead line.

Wake effects can prematurely age conductors and fittings, significantly reducing the life of the asset. For that reason, careful consideration should be taken if a wind turbine needs to be sited within the above limits. Agreement from National Grid will be required.

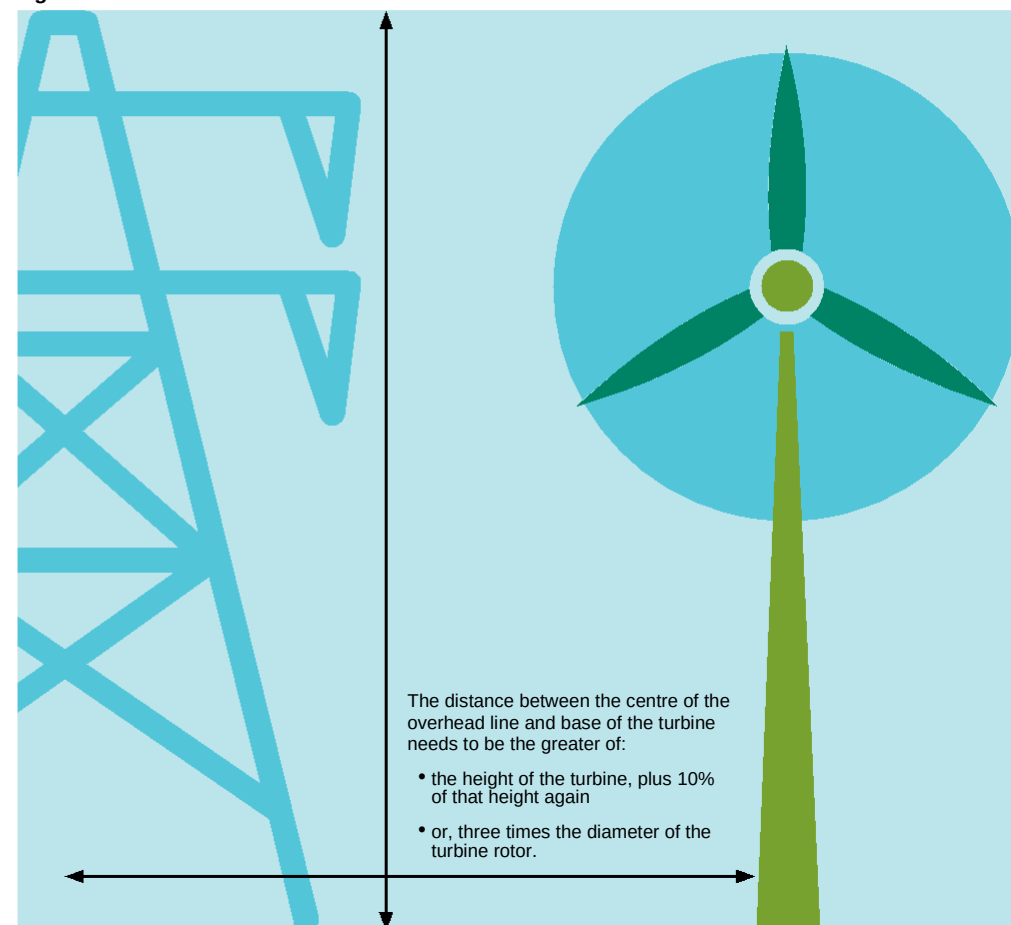
Commercial and housing developments

National Grid has developed a document called *Design guidelines for development near pylons and HVO power lines*, which gives advice to anyone involved in planning or designing large-scale developments that are crossed by, or close to, overhead lines.

The document focuses on existing 275kV and 400kV overhead lines on steel lattice towers, but can equally apply to 132kV and below. The document explains how to design large-scale developments close to high-voltage lines, while respecting clearances and the development's visual and environmental impact.

Section continues on next page »

Diagram not to scale



Turbines should be far enough away to avoid the possibility of toppling onto the overhead line



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The advice is intended for developers, designers, landowners, local authorities and communities, but is not limited to those organisations.

Overall, developers should be aware of all the hazards and issues relating to the electrical equipment that we have discussed when designing new housing.

As we explored earlier, National Grid's assets have the potential to create noise. This can be low frequency and tonal, which makes it quite noticeable. It is the responsibility of developers to take this into account during the design stage and find an appropriate solution.

Solar farms

While there is limited research and recommendations available, there are several key factors to consider when designing Solar Farms in the vicinity of Overhead Power Lines.

Developers may be looking to build on arable land close to National Grid's assets. In keeping with the safety clearance limits that we outlined earlier for solar panels directly underneath overhead line conductors, the highest point on the solar panels must be no more than 5.3m from the lowest conductors.

This means that the maximum height of any structure will need to be determined to make sure safety clearance limits aren't breached. This could be as low as 2m. National Grid will supply profile drawings to aid the planning of solar farms and determine the maximum height of panels and equipment.

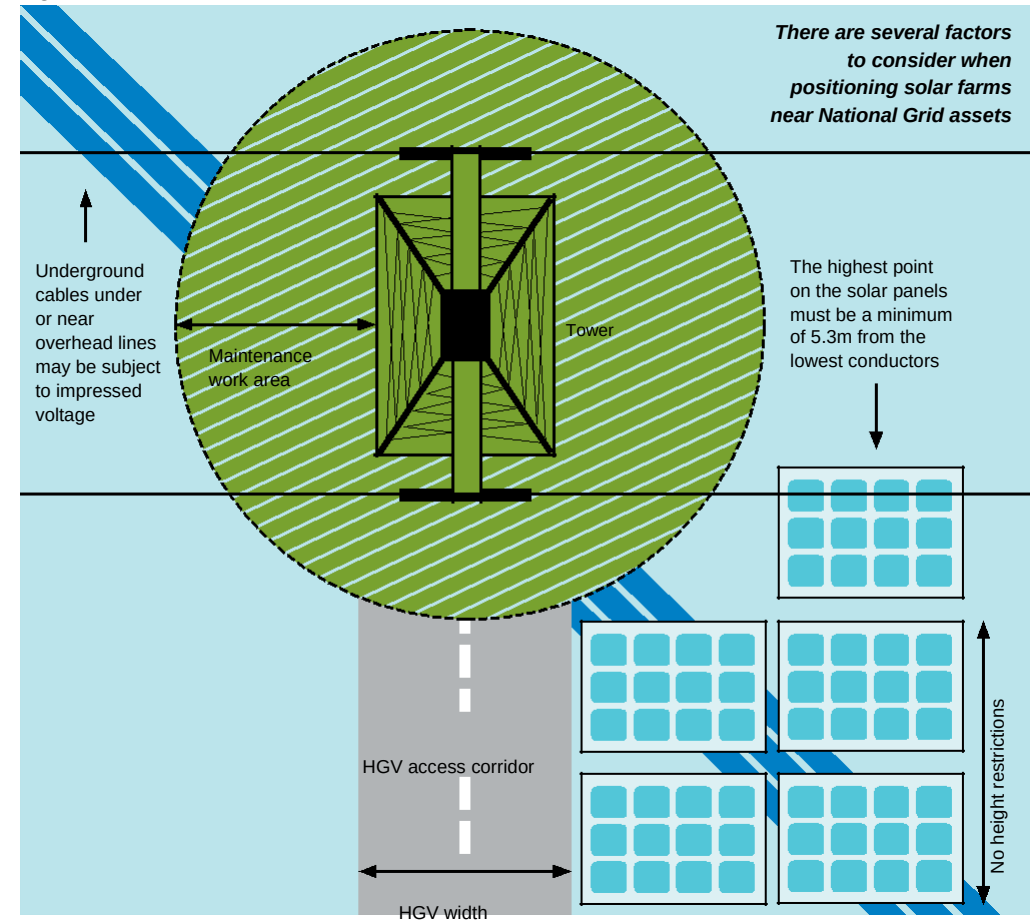
Solar panels that are directly underneath power lines risk being damaged on the rare occasion that a conductor or fitting falls to the ground. A more likely risk is ice falling from conductors or towers in winter and damaging solar panels.

There is also a risk of damage during adverse weather conditions, such as lightning storms, and system faults. As all our towers are earthed, a weather event such as lightning can cause a rise in the earth potential around the base of a tower. Solar panel support structures and supply cables should be adequately earthed and bonded together to minimise the effects of this temporary rise in earth potential.

Any metallic fencing that is located under an overhead line will pick up an electrical charge. For this reason, it will need to be adequately earthed to minimise microshocks to the public.

For normal, routine maintenance and in an emergency National Grid requires unrestricted access to its assets. So if a tower is enclosed in a solar farm compound, we will need full access for our vehicles,

Diagram not to scale



Including access through any compound gates. During maintenance – and especially re-conductoring – National Grid would need enough space near our towers for winches and cable drums. If enough space is not available, we would require solar panels to be temporarily removed.



Asset protection agreements

In some cases, where there is a risk that development will impact on National Grid's assets, we will insist on an asset protection agreement being put in place. The cost of this will be the responsibility of the developer or third party.

Contact details

Emergency situations

If you spot a potential hazard on or near an overhead electricity line, do not approach it, even at ground level. Keep as far away as possible and follow the six steps below:

- Warn anyone close by to evacuate the area
- Call our 24-hour electricity emergency number: 0800 404 090 (Option 1)¹
- Give your name and contact phone number
- Explain the nature of the issue or hazard
- Give as much information as possible so we can identify the location – i.e. the name of the town or village, numbers of nearby roads, postcode and (ONLY if it can be observed without putting you or others in danger) the tower number of an adjacent pylon
- Await further contact from a National Grid engineer

¹ It is critically important that you don't use this phone number for any other purpose. If you need to contact National Grid for another reason please use our Contact Centre at www2.nationalgrid.com/contact-us to find the appropriate information or call 0800 0014282.

Routine enquiries

Email:
assetprotection@nationalgrid.com

Call Asset Protection on:
0800 0014282

Opening hours:
Monday to Friday 08:00-16:00

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(2) Vertical Axis indicates meters above OS GB Datum 2m distance between minor marks/box

X & Y Co-ordinate of tower base. Route & Tower Number Tower Type

Span Length (m)

Height of Conductor Attachment Point Above OS GB

Bottom Conductor Displayed at Max Sag

5.3m Clearance line at Max Orange dashed line

7.3m Clearance line at Max Sag Blue dashed line

Lidar Data showing Buildings, Roads, Vegetation etc.

5.3m Clearance line at Max Swing Orange dashed line

North Arrow

OHL Plan View & Downward Looking Imagery

Section Operating Voltage, Conductor Type, Conductor Name, Bundle Configuration & Sagging Condition

(1) Vertical & Horizontal Scale – can be used in conjunction with a ruler to take measurements.

IMPORTANT: NOTE HORIZONTAL & VERTICAL SCALES DISTANCE (1) MAY DIFFER FROM HORIZONTAL & VERTICAL GRID MARKS SCALE/BOX DISTANCE (2).

Generic Data Origin of Drawing

Key for LIDAR Data

ENA43-8 Clearance to Objects at 400kV

Swing & Sag Diagram

NG Drawing Specific Data

Table 1: ENA43-8 Clearance to Objects at 400kV

Object	Clearance (m)
1. Buildings	10.0
2. Roads	10.0
3. Vegetation	10.0
4. Power Lines	10.0
5. Towers	10.0
6. Poles	10.0
7. Fences	10.0
8. Walls	10.0
9. Gates	10.0
10. Other Structures	10.0

Table 2: Swing Clearances

Object	Clearance (m)
1. Buildings	10.0
2. Roads	10.0
3. Vegetation	10.0
4. Power Lines	10.0
5. Towers	10.0
6. Poles	10.0
7. Fences	10.0
8. Walls	10.0
9. Gates	10.0
10. Other Structures	10.0

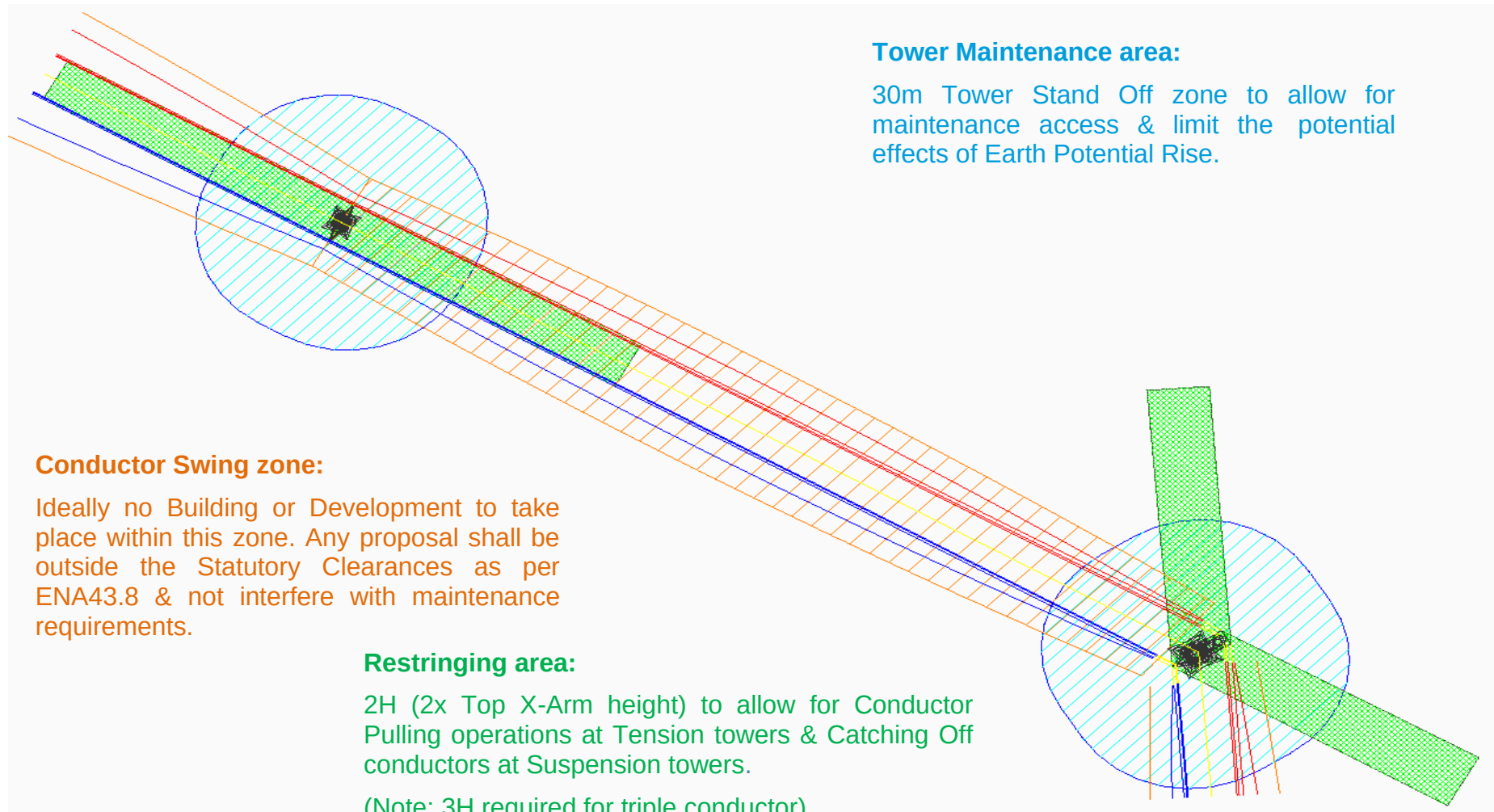
Table 3: Drawing Legend

Symbol	Description
[Line]	Conductor
[Point]	Tower Base
[Area]	Ground Level
[Line]	Clearance Line
[Area]	Lidar Data
[Line]	Span Length
[Line]	Bottom Conductor
[Line]	5.3m Clearance Line
[Line]	7.3m Clearance Line
[Line]	5.3m Clearance Line at Max Swing
[Line]	North Arrow
[Image]	OHL Plan View & Downward Looking Imagery
[Table]	Section Operating Voltage, Conductor Type, Conductor Name, Bundle Configuration & Sagging Condition
[Table]	Generic Data Origin of Drawing
[Table]	Key for LIDAR Data
[Table]	ENA43-8 Clearance to Objects at 400kV
[Table]	Swing & Sag Diagram
[Table]	NG Drawing Specific Data

15 APPENDIX B



OHL Tower Stand Off & Reconductoring Area



Date: 18 June 2026
Our ref: 549520
Your ref: EN0110032



Humberhead Solar Farm
Humberhead Solar Limited
Unit 25.7
Coda Studios
189 Munster Road
London
SW6 6AW

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

T 0300 060 900

BY EMAIL ONLY

Dear [REDACTED]

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

Proposal: Humberhead Solar Farm

Location: 14km to the south-east of York and 23km to the north-east of Hull, to the west of Market Weighton

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 27 May 2026.

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.

Detailed advice on scoping the Environmental Statement is available in the attached Annex.

For any further advice on this consultation please contact
consultations@naturalengland.org.uk.

Yours sincerely

[REDACTED]

Yorkshire and Northern Lincolnshire Area Team
Natural England

Annex A – Natural England’s Advice on EIA Scoping

1. General principles

1.1. 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
- 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.

2. Cumulative and in-combination effects

2.1. It will be important for any assessment to consider the potential cumulative effects of this proposal, including all supporting infrastructure, with other similar proposals and a thorough assessment of the ‘in combination’ effects of the proposed development with any existing developments and current applications. A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

2.2. The ES should include an impact assessment to 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;
- 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.

- 2.3. Natural England has not undertaken a comprehensive review of all plans and projects that may need to be considered; however, we advise that the assessment should consider Mylen Leah Solar Farm (NSIP ref: EN0110002), which is located in close proximity to parts of the Scheme.

3. Environmental data

- 3.1. 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>.
- 3.2. Detailed information on the natural environment is available at www.magic.gov.uk. This includes Marine Conservation Zone GIS shapefiles.
- 3.3. 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](#).
- 3.4. 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. Biodiversity and geodiversity

- 4.1. The assessment will need to include potential impacts of the proposal upon sites and features of nature conservation interest as well as opportunities for nature recovery through biodiversity net gain (BNG). There might also be strategic approaches to take into account.
- 4.2. Ecological Impact Assessment (EclA) is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal. Guidelines and an EclA checklist have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).
- 4.3. For additional information relating to Solar Parks, it may be helpful to refer to the Technical Information Note at the link below, which provides a summary of advice about their siting, their potential impacts and mitigation requirements for the safeguarding of the natural environment. [Solar parks: maximising environmental benefits \(TIN101\)](#).
- 4.4. For additional information regarding the impact of solar farms on birds, bats and general ecology, please refer to the report below, which provides an evidence review of relevant scientific and grey literature. [Evidence review of the impact of solar farms on birds, bats and general ecology 2016 - NEER012 \(naturalengland.org.uk\)](#).

5. International and European sites

- 5.1. The development site is within or may impact on the following European/ internationally

designated nature conservation site(s):

- Lower Derwent Valley Special Protection Area (SPA)
- Lower Derwent Valley Special Area of Conservation (SAC)
- Lower Derwent Valley Ramsar
- Humber Estuary SPA
- Humber Estuary SAC
- Humber Estuary Ramsar
- River Derwent SAC

5.2. Natural England concur that Skipwith Common SAC, Thorne and Hatfield Moors SAC and Strensall Common SAC can be scoped out of further assessment.

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

5.4. 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.

5.5. Table 1 sets out Natural England's advice on the potential impacts on internationally designated sites, including where further information is required. This advice is based on the information provided in the EIA Scoping Report (submitted on 26th May 2026).

Table 1: Potential risk to international designated sites: the development is within or may impact on the following sites	
Site name(s) with link to conservation objectives	Potential impact pathways where further information/ assessment is required
Lower Derwent Valley SPA European Site Conservation Objectives for Lower Derwent Valley SPA - UK9006092 Lower Derwent Valley Ramsar Humber Estuary SPA European Site Conservation Objectives for Humber Estuary SPA - UK9006111 Humber Estuary Ramsar	<u>Potential impacts to functionally linked land (FLL)</u> The following advice is based on the EIA Scoping Report. Natural England will engage with the Applicant through its Discretionary Advice Service to ensure that impacts to FLL are appropriately assessed and mitigated where necessary. Potential impacts may arise from the presence of mobile SPA interest features both within and beyond the Site boundary. In this context, Natural England agrees that potential impacts on bird species should be scoped in and advises that both onsite and offsite impacts are considered when assessing the potential effects on European sites. Natural England advises that the ES/ HRA should consider: • any impacts due to potential direct loss of functionally linked habitat for SPA bird species; • the potential for loss of FLL which is adjacent to the project due to disruption of open vistas; • the potential for noise and visual disturbance impacts (including lighting) on FLL during construction and operation.

Table 1: Potential risk to international designated sites: the development is within or may impact on the following sites

Site name(s) with link to conservation objectives	Potential impact pathways where further information/ assessment is required
	The ES will need to consider impacts to all species of the SPA non-breeding bird assemblages, in addition to individually qualifying species utilising areas outside of the site boundary which are functionally linked to the SPA. Natural England welcome that wintering bird surveys are underway. We note that these are ongoing and will provide more detailed advice once the full survey results are available to review. Based on the information provided to date, Natural England considers it likely that suitable habitat creation/ management/ protection for SPA bird species will be required. It will need to be clearly demonstrated that the mitigation areas will be able to support the species impacted by the development. All mitigation areas should be adequately secured, managed and monitored. Natural England advises an ecological mitigation plan should be secured and include the following: • Clear objectives • Target/s for each objective, including SPA bird use targets and habitat targets • Details of limits of acceptable change • Details of required management and monitoring (including who is responsible and when it will take place) • Details of remedial actions, where appropriate. <u>Wintering bird survey methodology</u> Natural England notes that the applicant has undertaken non-breeding bird surveys between October 2025 and March 2026. We acknowledge that further ornithological surveys are proposed, including spring passage surveys (March to mid-May 2026 for the Humberhead Sites and March to mid-May 2027 for the Cable Route Search Corridor (CRSC)), autumn passage surveys (August to October 2026 for both the Humberhead Sites and CRSC), and wintering bird surveys (November to February for the CRSC only). Natural England also notes that paragraph 8.5.9 of the EIA Scoping Report (page 172) indicates that the applicant intends to undertake only one year of wintering bird surveys for the Humberhead Sites and the CRSC, drawing comparison with the approach taken for Light Valley Solar (NSIP). The survey approach taken for Light Valley Solar was case-specific and supported by detailed information. At this stage, Natural England does not consider it appropriate to assume that one year of survey data will be sufficient, and, based on the information currently available, advises that two years of wintering, and passage, bird surveys should be undertaken in line with guidance set out in Annex C.

Table 1: Potential risk to international designated sites: the development is within or may impact on the following sites

Site name(s) with link to conservation objectives	Potential impact pathways where further information/ assessment is required
	The proposed survey methodology includes the use of transect (walkover) surveys in place of Vantage Point (VP) surveys, which are generally recommended. Where VP surveys are not considered appropriate for a particular site, clear reasoning and justification regarding the alternative survey methods undertaken should be provided. Walkover surveys can result in the disturbance and displacement of birds, and therefore the applicant should demonstrate how this potential effect has been taken into account. Natural England notes that count data presented in Tables 8-4, 8-5 and 8-6 indicate that geese and swans have been recorded during the wintering bird surveys for the Humberhead Sites. Where these species have the potential to use the Site or surrounding area, surveys should include coverage at dawn and dusk. We recommend 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. To support a robust assessment of survey effort, Natural England advises that: - the dates and times of all surveys are clearly set out. At present, it is unclear whether Vantage Point (VP) surveys were undertaken on separate days to walkover surveys, i.e. whether one or two survey days were completed. Natural England recommends that a minimum of two survey visits per month are undertaken during the wintering and passage periods. - a clear visual representation of survey coverage is provided, including both transect and any VP surveys, to identify any gaps in coverage. <u>Use of the 1% threshold for determining areas of FLL</u> Natural England notes that in point 8.5.58 reference is made to the use of a 1% threshold to determine whether the number of birds recorded during surveys represent significant numbers of the Lower Derwent Valley SPA or Humber Estuary SPA populations. Natural England does not consider that the application of a 1% threshold alone is a suitable way of defining important areas of FLL and welcomes that point 8.6.32 confirms that other factors will be considered in the assessment of FLL. The assessment should consider other relevant factors, including regularity of site usage,

Table 1: Potential risk to international designated sites: the development is within or may impact on the following sites

Site name(s) with link to conservation objectives	Potential impact pathways where further information/ assessment is required
	species diversity, SPA conservation objectives, population trends, and existing pressures on the relevant species.
Lower Derwent Valley SAC European Site Conservation Objectives for Lower Derwent Valley SAC - UK0012844 River Derwent SAC European Site Conservation Objectives for River Derwent SAC - UK0030253 Humber Estuary SAC European Site Conservation Objectives for Humber Estuary SAC - UK00300170 Humber Estuary Ramsar	<u>Potential impacts to SAC qualifying species</u> Natural England does not agree that impacts to otter can be ruled out at this stage. The ES should consider direct and indirect impacts to otter associated with Lower Derwent Valley SAC and the River Derwent SAC. These impacts may include: • Habitat loss • Loss of habitat connectivity • Habitat damage • Visual and noise disturbance • Water quality impacts This should include an assessment of the potential connectivity of water courses, suitability of habitats, and the distance that otter are likely to travel. In addition, Natural England does not agree that impacts to river and sea lamprey can be ruled out at this stage. The ES should consider direct and indirect impacts to migrating lamprey species. These impacts may include: • Injury/ mortality • Habitat loss • Loss of habitat/ migration route connectivity • Habitat damage • Visual and noise disturbance • Water quality impacts Records indicate that river and sea lamprey migrate through waterways adjacent to parcel 1-2 and through areas currently included in the CRSC. The ES should consider connectivity of watercourses within the order limits to the River Derwent SAC and Humber Estuary SAC and Ramsar sites to assess whether these are part of migration routes for lamprey. Furthermore, Natural England notes that a depth of 1.5 m below the bed of a watercourse is proposed for Horizontal Directional Drilling (HDD). Natural England has previously recommended that HDD should be undertaken at a minimum of 5 m below the bed of a watercourse to avoid potential impacts to migrating river and sea lamprey. <u>Potential water quality impacts</u> The Order Limits include several drains and watercourses, and the

Table 1: Potential risk to international designated sites: the development is within or may impact on the following sites

Site name(s) with link to conservation objectives	Potential impact pathways where further information/ assessment is required
	River Derwent SAC and Lower Derwent Valley SAC are located downstream of the Order Limits. The ES should therefore consider the potential for pollution events during construction and decommissioning to result in direct or indirect impacts on SAC habitats and species via hydrological connectivity. The ES should also assess the operational impact of solar panel washing fluid on watercourses. Natural England advise that a methodology which does not impact water quality should be used.

6. Nationally designated sites - Sites of Special Scientific Interest (SSSI)

6.1. Sites of Special Scientific Interest (SSSI) are protected under the Wildlife and Countryside Act 1981 (as amended). Further information on the SSSI and its special interest features can be found at www.magic.gov.uk.

6.2. The development site is within or may impact on the following Sites of Special Scientific Interest:

- Pocklington Canal SSSI
- White Carr Meadow SSSI
- Melbourne and Thornton Ings SSSI

6.3. The ES should include a full assessment of the direct and indirect effects of the development on the features of special interest within Pocklington Canal SSSI, White Carr Meadow SSSI and Melbourne and Thornton Ings SSSI and identify appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects.

6.4. Table 2 sets out Natural England's advice on the potential impacts on nationally designated sites.

Table 2: Potential risks to nationally designated sites: the development is within or may impact on the following sites

Site names	Potential impact pathways where further information/ assessment is required
Pocklington Canal SSSI White Carr Meadow SSSI Melbourne and Thornton Ings SSSI	<u>Potential direct and/ or indirect impacts to designated sites</u> Pocklington Canal SSSI and White Carr Meadow SSSI are located within the Order Limits, and Melbourne and Thornton Ings SSSI is located downstream. The ES should therefore assess the potential for both direct, and indirect impacts to the SSSIs, including habitat loss/ damage and pollution impacts during construction. <u>Potential water quality impacts</u> The ES consider the potential for pollution events during

Table 2: Potential risks to nationally designated sites: the development is within or may impact on the following sites

Site names	Potential impact pathways where further information/assessment is required
	construction, operation (including panel washing), and decommissioning to result in direct and indirect impacts on these designated sites, including effects via hydrological connectivity. The ES should also consider the operational impact of solar panel washing fluid on watercourses. <u>Potential impacts from changes in air quality</u> See section 15 below for further information on air quality impacts to designated sites with 200 m of the proposed development site.
Pocklington Canal SSSI Melbourne and Thornton Ings SSSI	<u>Potential impacts from Horizontal Directional Drilling (HDD)</u> Pocklington Canal SSSI is one of the most important canal sites in England. Natural England notes that Pocklington Canal is directly adjacent to Humberhead Site 1-1 and lies within the area of search for the underground grid connection cable. We note that HDD is proposed to avoid potential impacts to Pocklington Canal SSSI. We advise that the required standoff distance for the HDD pits will depend on local geology and adjacent habitats. Therefore, ground investigation and habitat surveys should be completed to determine the appropriate standoff distance in the proposed location/s. Based on previous HDD in the area, 20-30 meters may be appropriate if the send and receive pits are situated in arable land. The ES should assess potential for direct and indirect impacts of HDD on the designated site including potential noise and visual disturbance impacts from HDD to breeding birds using the SSSI, and any water quality/dust impacts which may occur during construction. <u>Potential impacts to SSSI qualifying species</u> Natural England notes that breeding bird surveys are not proposed for the Cable Route Corridor (CRC). Natural England advises that, where the Order Limits overlap with Pocklington Canal SSSI, breeding bird surveys should be undertaken, including a 100 m buffer, to assess impacts on the designated breeding bird assemblage. Natural England advises that the potential impacts to the Pocklington Canal SSSI invertebrate assemblage should also be assessed within the ES, including potential impacts of increased light spill. The ES should consider direct and indirect impacts to otter associated with Pocklington Canal SSSI and Melbourne and

Table 2: Potential risks to nationally designated sites: the development is within or may impact on the following sites	
Site names	Potential impact pathways where further information/assessment is required
	Thornton Ings SSSI. These impacts may include: • Habitat loss • Loss of habitat connectivity • Habitat damage • Visual and noise disturbance • Water quality impacts This should include an assessment of the potential connectivity of water courses, suitability of habitats, and the distance that otter are likely to travel.

7. Protected species

- 7.1. 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.
- 7.2. 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.
- 7.3. Natural England has adopted [standing advice](#) for protected species, which includes guidance on survey and mitigation measures. A separate protected species licence from Natural England or Defra may also be required. Applicants can also make use of Natural England's charged service [Pre Submission Screening Service](#) for a review of a draft wildlife licence application.

8. District Level Licensing for Great Crested Newts

- 8.1. Natural England note that Great Crested Newt (GCN) HSI and eDNA surveys have been undertaken within the Humberhead Sites and the Cable Route Search Corridor this spring (EIA Scoping Report, page 172) and that the applicant has noted that European Protected Species Mitigation Licences may be required for GCN (EIA Scoping Report, page 193). We advise that consideration should be given to whether District Level Licensing (DLL) may be used for GCN mitigation for this project.
- 8.2. The DLL approach is underpinned by a strategic area assessment which includes the identification of risk zones, strategic opportunity area maps and a mechanism to ensure adequate compensation is provided regardless of the level of impact. In addition, Natural England (or an alternative DLL provider) will undertake an impact assessment, the outcome of which will be documented in the IACPC (or equivalent).

- 8.3. Where strategic approaches such as DLL for GCN are used, a Letter of No Impediment (LONI) will not be required. Instead, the developer will need to provide evidence to the Examining Authority (ExA) on how and where this approach has been used in relation to the proposal, which must include a counter-signed Impact Assessment and Conservation Payment Certificate (IACPC) from Natural England, or a similar approval from an alternative DLL provider.
- 8.4. If no GCN surveys have been undertaken, Natural England's risk zone modelling may be relied upon. During the impact assessment, Natural England will inform the applicant whether their scheme is within one of the amber risk zones and therefore whether the Proposed Development is likely to have a significant effect on GCN.
- 8.5. The IACPC will also provide additional detail including information on the Proposed Development's impact on GCN and the appropriate compensation required.
- 8.6. By demonstrating that the DLL scheme for GCN will be used, consideration of GCN in the ES can be restricted to cross-referring to the Natural England (or alternative provider) IACPC as a justification as to why significant effects on GCN populations as a result of the Proposed Development would be avoided.

9. Priority Habitats and Species

- 9.1. 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.
- 9.2. 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](#).
- 9.3. 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.
- 9.4. 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

10. Ancient Woodland, ancient and veteran trees

- 10.1. The ES should assess the impacts of the proposal on the ancient woodland and any ancient and veteran trees, and the scope to avoid and mitigate for adverse impacts. It

should also consider opportunities for enhancement.

- 10.2. 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.
- 10.3. 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.
- 10.4. The [ancient tree inventory](#) provides information on the location of ancient and veteran trees.
- 10.5. We note that ancient woodland has been identified close to the Site boundary in Seaton Old Wood Ancient Replanted Woodland and two veteran trees have been identified in close proximity to the southern boundary of the Humberhead 4 parcel. Natural England welcomes that surveys of ancient woodland and veteran trees have been completed and results are being evaluated.
- 10.6. Natural England and the Forestry Commission have prepared [standing advice](#) on ancient woodland, ancient and veteran trees.

11. Biodiversity Net Gain

- 11.1. Natural England welcome that the scheme is expected to deliver Biodiversity Net Gain (BNG) in excess of the mandated 10% (EIA Scoping Report, page 193).
- 11.2. Whilst Natural England are not the statutory consultee with regard to BNG, and as such will not make detailed comments on metric calculations and compliance, we would welcome further discussion with the applicant regarding their approach to BNG delivery for this project and the opportunities it poses for enhancement.
- 11.3. BNG will become mandatory for all NSIP applications made on or after 2 November 2026. The government has recently published Biodiversity gain statements for nationally significant infrastructure projects available [here](#) and updated guidance available [here](#).
- 11.4. 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. 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. It is noted that the Scheme is located partially within an area of mapped measures as identified in the Hull and East Yorkshire LNRS. It is recommended that engagement with relevant local planning authority, responsible authorities and statutory consultees (including Natural England) is undertaken to align habitat enhancement with the Hull and East Yorkshire LNRS.

12. Landscape

- 12.1. Public bodies have a duty to seek to further the statutory purposes of designation in carrying out their functions (under section 245 of the Levelling Up and Regeneration Act 2023). This duty also applies to proposals outside the designated area but impacting on its natural beauty.
- 12.2. 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.
- 12.3. 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 (LI) and Institute of Environmental Management and Assessment (IEMA) 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.
- 12.4. 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 LI and IEMA. For Areas of Outstanding Natural Beauty (AONBs), 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.
- 12.5. 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.
- 12.6. 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.
- 12.7. The National Infrastructure Commission has also produced [Design Principles for National Infrastructure - NIC](#) endorsed by Government in the National Infrastructure Strategy.

Yorkshire Wolds National Landscape

- 12.8 The Scheme is located within the setting of an area identified on a draft Order which Natural England propose designating as a National Landscape. Whilst the publication of the draft Order in a statutory Notice in February 2026 does not confer any additional planning protection, the impact of the proposal on the natural beauty of this area may be a relevant matter in the determination of the proposal. Natural England considers the area proposed for designation to be a valued landscape.
- 12.9 An assessment of the landscape and visual impacts of the proposal on this area and

its setting should be undertaken, with opportunities taken to avoid or minimise impacts on the landscape and secure enhancement opportunities. Any infrastructure development should reflect or enhance the intrinsic character and natural beauty of the area and be in line with the relevant National Policy Statement(s).

- 12.10 The land comprising the proposed National Landscape, and any visual receptors within it, should therefore be assigned the highest sensitivity when undertaking the assessment. The assessment should also explicitly acknowledge that the Proposed Development is located within the setting of the proposed National Landscape and, as such, has the potential to adversely affect its natural beauty. The assessment should also explicitly acknowledge the statutory duty to seek to further the statutory purposes of the area. These factors should be considered when assessing embedded mitigation.

Landscape and Visual Assessment Scope

- 12.11. Natural England does not consider the proposed study areas for landscape and visual assessment to be sufficient.
- 12.12. The Zone of Theoretical Visibility (ZTV) indicates the scheme will be visible at beyond the 2 km study area, particularly from elevated land to the northeast and east, includes areas within the Yorkshire Wolds National Landscape. Whilst effects on visual receptors can reduce with distance, elevation can bring panoramic views which changes the extent of Proposed Development visible. The study area should therefore be extended, and a minimum of 5 km is recommended.
- 12.13. Natural England does not agree that a 500 m study area for the CRC is sufficient at this stage. In particular, the assessment should take account of the rising ground to the north-east and east, and the high sensitivity of landscape and visual receptors in that location. Natural England recommends that the potential for vegetation removal to give rise to longer-term, and potentially significant, operational landscape and visual effects extending beyond 500 m is fully considered and reflected in the assessment.
- 12.14. Natural England also advises that:
- the Yorkshire Wolds Way National Trail should be clearly identified on all figures and described appropriately in the text; and
 - sufficient viewpoints should be included to represent receptors within and beyond the proposed Yorkshire Wolds National Landscape, with particular consideration given to views from the Yorkshire Wolds Way, including along the Londesborough Registered Park and Garden.

13. Connecting people with nature

- 13.1. The ES should consider potential impacts on access land, common land, public rights of way and, where appropriate, the England Coast Path and coastal access routes and coastal margin in the vicinity of the development, in line with NPPF paragraph 104 and there will be reference in the relevant National Policy Statement. 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.
- 13.2. 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.

- 13.3. Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

14. Soils and agricultural land quality

- 14.1. 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. Further guidance is set out in the Natural England [Guide to assessing development proposals on agricultural land](#).
- 14.2. The following issues should be considered and, where appropriate, included as part of the ES:
- The degree to which soils would be disturbed or damaged as part of the development.
 - The extent to which agricultural land would be disturbed or lost as part of this development, including whether any BMV agricultural land would be impacted.
- 14.3. This may require a detailed Agricultural Land Classification (ALC) survey if one is not already available. For information on the availability of existing ALC information see www.magic.gov.uk.
- 14.4. Natural England notes at this stage the CRC is yet to be determined so no baseline data for this element of the Scheme has been presented within the Scoping Report. Natural England advises that land quality and soil resource information should be collected for all land affected by the development. Ideally, a detailed ALC survey should be undertaken across the whole site. However, as a minimum, an ALC survey should be carried out within the CRC once it has been defined.
- 14.5. Where an ALC and soil survey of the land is required, this should normally be at a detailed level, e.g. one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres. The survey data can inform 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).
- 14.6. The ES should set out details of how any adverse impacts on BMV agricultural land can be minimised through site design.
- 14.7. 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](#).
- 14.8. For NSIP proposals, areas subject to soil sealing or permanent hardstanding (including, but not limited to, inverter bases, BESS, substation platforms and building foundations) should be assessed on a precautionary worst-case basis as permanent

losses of agricultural land, irrespective of any proposed decommissioning or restoration measures. Natural England notes that point 14.2.43 in the EIA Scoping Report (page 387) states that areas impacted by the BESS and on-site substations may result in permanent loss of BMV agricultural land and will be considered as such in the ES. Natural England agrees with this approach.

15. Air quality

- 15.1. Natural England advises that the potential for air quality impacts arising from this NSIP needs to be assessed. Natural England refers you to our standard advice on air quality impacts which can be found in Annex D. This standard advice is Natural England's formal statutory advice. It provides decision makers with the information needed to fulfil their statutory duties when making decisions on proposals with potential air pollution impacts. An overall conclusion regarding impacts on statutory protected sites must take into account the standard advice for air pollution.

16. Climate change

- 16.1. As the government's adviser on the natural environment, climate change is central to Natural England's work. Climate change is a profound threat to nature and people. The natural environment is experiencing the impacts of climate change and needs to recover, adapt to change and build resilience. Sustainable development can and should contribute to net zero through supporting nature recovery and climate change mitigation and adaptation, helping both nature and people adapt, through Nature-based Solutions.
- 16.2. The Environmental Statement (ES) should identify how the development affects the ability of the natural environment (including habitats, species, and natural processes) to adapt to climate change, including its ability to provide adaptation for people. This should include impacts on the vulnerability or resilience of a natural feature (i.e. what's already there and affected) as well as impacts on how the environment can accommodate change for both nature and people, for example whether the development affects species ability to move and adapt. Nature-based Solutions, such as providing green infrastructure on-site and in the surrounding area (e.g. to adapt to flooding, drought and heatwave events), habitat creation and peatland restoration, should be considered. The ES should set out the measures that will be adopted to address impacts.
- 16.3. Renewable and low carbon energy schemes should maximise opportunities for delivering multiple benefits for nature recovery, biodiversity, and people. Habitats created and enhanced through schemes should be well-designed, good quality, well-managed and contribute to strategic priorities for nature.

17. Green infrastructure

- 17.1. Green Infrastructure (GI) is defined in the National Planning Policy Framework (NPPF) as *"a network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity."*
- 17.2. NSIPs play a role in delivering GI to enable more sustainable development, climate resilience, and nature recovery. Natural England highlights that the Overarching NPS for Energy (EN1) states:

“4.6.13 In addition to delivering biodiversity net gain, developments may also deliver wider environmental gains and benefits to communities relevant to the local area, and to national policy priorities, such as:

- *reductions in GHG emissions*
- *reduced flood risk*
- *improvements to air or water quality,*
- *climate adaptation,*
- *landscape enhancement*
- *increased access to natural greenspace, or*
- *the enhancement, expansion or provision of trees and woodlands*

*The scope of potential gains will be dependent on the type, scale, and location of specific projects. **Applicants should look for a holistic approach to delivering wider environmental gains and benefits through the use of nature-based solutions and Green Infrastructure.**”*

Natural England therefore encourages the incorporation of GI into NSIPs.

- 17.3. GI refers to natural and semi-natural features and networks, such as parks, woodlands, and wetlands, that provide a range of benefits including flood protection, air quality improvement, and biodiversity enhancement.

GI should:

- create and maintain green liveable places that enable people to experience and connect with nature
- enhance ecological networks, support ecosystems services and connect as a living network at local, regional and national scales.

- 17.4. Natural England has developed the [Green Infrastructure Framework](#) – a national standard to guide the planning, design, and maintenance of green infrastructure in England. This framework provides guidance for integrating natural elements into major developments.

- 17.5. For evidence-based advice and tools on how to design, deliver and manage green and blue infrastructure (GI), we refer you to [Green Infrastructure Home](#). This includes:

- The [Principles](#) that underpin the Green Infrastructure Framework, which set out what good green infrastructure is, why it's important and how to do it well.
- The [Standards](#), which define what good green infrastructure 'looks like' for local planners, developers, parks and greenspace managers and communities, and how to plan it strategically to deliver multiple benefits for people and nature.
- The [Green Infrastructure Planning and Design Guide](#), which provides guidance for developers on how well-designed GI can integrate with built design to create good quality, distinctive and sustainable places.
- [Mapping Database](#) with analysis of existing provision, including mapped representation of the areas thought to meet the size and proximity criteria.
- The [Environmental Benefits from Nature Tool](#) highlights wider benefits and comparison of options.

- 17.6. We recommend a bespoke approach to identifying the most suitable types, locations and scale of GI needed to support growth, alongside health and wellbeing, biodiversity and climate resilience in the context of each proposal. Consideration should be given to the relevant Local Nature Recovery Strategy/ies (LNRS).

- 17.7. Natural England recommends that NSIPs should include a GI plan, including a long-term delivery and management plan. Relevant aspects of local authority GI strategies and Local Nature Recovery Strategies (LNRS) should be integrated and delivered where appropriate.

18. Biodiversity Enhancement

- 18.1. Section 2.10 of the National Policy Statement for Renewable Energy Infrastructure (EN-3, 2024) highlights that solar farms have the potential to greatly increase the biodiversity value of a site, especially on land which was previously intensively managed.
- 18.2. Research indicates that solar farms managed specifically for biodiversity show significant increases in plants, invertebrates, and birds, compared with sites which are not. Consequently, the implementation of good design and management on solar sites can result in significant environmental enhancements beyond that which is required through Biodiversity Net Gain.
- 18.3. Please refer to Annex G for further information regarding the management of solar farms to enhance biodiversity.

Annex D: Standard Advice for Air Quality Impacts in Nationally Significant Infrastructure Projects (NSIPs)

Natural England provides the following standard advice on air pollution. This advice relates to the protection of protected sites under the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations) and the Wildlife and Countryside Act 1981 and should be taken as Natural England's formal representation. This standard advice is applicable to all stages of the NSIP process and may be used by the applicant for NSIP pre application stages, by the Examining Authority (ExA) during the statutory stages of the NSIP and by the relevant Secretary of State as the competent authority.

Protected sites are 'sites of special scientific interest' (SSSIs) and 'habitats sites' (also called 'European sites'). For the purposes of this advice, Habitats Sites are Special Areas of Conservation (SACs), possible SACs, Special Protection Areas (SPAs), Potential SPAs, Ramsar sites, and sites identified, or required, as compensatory measures for adverse effects on Habitats Sites. Although their regulatory frameworks differ, the general principles and approach for air pollution assessment outlined for Habitats Sites are also relevant for SSSIs. Where the following advice applies to both, we use the term protected sites. Where the advice or approach differs, the individual terms are used.

This includes advice on information that is required to assess this and how to interpret the results of air quality modelling for the decision maker to conclude whether air quality impacts would have an adverse effect on the integrity of a Habitat site or a SSSI. You should also consider any relevant caselaw that could affect how you carry out any air quality assessments.

Air pollutants

This advice covers the following air pollutants from the construction, operation and decommissioning phases of a proposal

- ammonia (NH₃)
- nitrogen oxides (NO, NO₂ or NO_x)
- nitrogen deposition
- acid deposition
- sulphur dioxide (SO₂)

Standing advice on air pollution and development is also available here:

<https://www.gov.uk/guidance/air-pollution-and-development-advice-for-local-authorities>

Whilst the standing advice does not cover NSIPs, it does include additional technical advice which may prove useful. However, in summary, Table 1 provides the steps that we advise should be taken to assess air quality impacts on protected sites. The applicant should provide their own assessment containing the information and detailed modelling you need. You need to review this and make your own conclusion.

Table 1: Sequential approach to air quality assessments

Stage	Step	Supplemental evidence/ basis for judgment
Initial screening for credible risk of an effect	1 Check Distance criteria - could significant emissions reach a protected site? Yes = move to Step 2 No = no further HRA required	The Air Pollution Information System (APIS) includes an introduction to air pollution. APIS provides site specific information on the interest features of individual protected sites and

			the sensitivity to air quality impacts of those features. Please see Table 2 for industrial air pollution screening distances. For road traffic impacts, roads on the affected road network that lie within 200m of a designated site should be considered. Use Magic Map to check the location of designated sites. Search for the location then select the 'Designations' option.
	2	Check if the qualifying habitats or supporting habitat of qualifying species are sensitive to air quality impacts. Yes = move to Step 3 No = no further HRA required APIS Site relevant Critical Loads and Levels (based on literature and professional judgement) http://www.apis.ac.uk/src1 Some habitats may not have a critical load because there is not enough data. In these cases, you should find the critical load for a similar habitat type or feature.	The qualifying features of Habitats Sites can be identified in the relevant Site Conservation Objectives and Supplementary advice packages, which include a definitive list of legally qualifying features. These objectives are available here. Alternatively, a list of qualifying features can also be found by searching for the Habitats Site and SSSIs on Designated Sites View, alongside Conservation Objectives and Supplementary Advice for Habitats Sites. The above links will also show whether any of the qualifying features for Habitats Sites have a Restore or Maintain Conservation Objective in relation to air quality thresholds (critical levels or loads). If the site is a SPA or an SAC/SSSI designated for an animal species (as opposed to a habitat), determine whether the predicted pollution effects on the supporting habitat will have a negative effect on the notified species.
Detailed AQ modelling	3	Undertake detailed modelling using a recognised dispersal model – i.e. Atmospheric Dispersion Modelling System (ADMS) Unless robust site-specific evidence is provided, we advise the lower range of the critical load should be used in modelling. If there are site specific reasons why it is more appropriate to use the higher end of the range, then this should be clearly evidenced.	Air Quality modelling should include relevant scenarios that are clearly identified. One such example of scenarios is a baseline plus future forecasts as follows: Baseline, a construction year, and future operational year(s), do nothing (without proposal), do something (with proposal); taking into account background trends for each pollutant). For proposals that will emit pollutants from a point source, it is helpful to provide isopleths of the dispersion modelling results, showing the predicted contours of pollutant concentration and deposition of the development. These may be assessed against the locations of protected sites and sensitive features within those sites. At least 3 years of meteorological data should be included within the AQ modelling for sources other than for road transport modelling The Institute of Air Quality Management (IAQM) has produced the following document to assist its

			members in the assessment of the air quality impacts of development on designated nature conservation sites: air-quality-impacts-on-nature-sites-2020.pdf
Applying screening thresholds	4a	Apply Screening Threshold Alone If below threshold alone, move to step 4b. If above = move straight to step 5	Ascertain the Process Contribution (PC) from the plan or project (emissions and predicted deposition). Apply Screening threshold (1% of critical level or load) alone using the <u>annual averages</u>. If the process contribution is less than 1% of the relevant long-term benchmark (Environmental Assessment Level, Critical Level or Critical Load), the emission is not likely to have a significant effect <u>alone</u> irrespective of the background levels.
	4b	Apply Screening Threshold In-combination. If below threshold in-combination = no LSE/significant risk of damage etc and no further assessment required. If above = move straight to step 5 Applicants might use the Joint Nature Conservation Committee (JNCC) 'decision-making thresholds' as a reason for not completing an in-combination assessment. If so, you should check they have correctly followed the JNCC guidance on decision-making thresholds. If this guidance shows they do not need to complete an in-combination assessment, continue to step 5. If applicants have not used the decision-making thresholds, or have not followed them correctly, they will need to provide an in-combination assessment.	Use information from competent authorities (Planning Portal, PINS NSIP register or Environmental Permitting register) to determine if there are plans or projects in the pipeline (not included in the current baseline) that should be considered in-combination If the combined process contribution is less than 1% of the relevant long-term benchmark (Environmental Assessment Level, Critical Level or Critical Load), the emission is not likely to have a significant effect <u>in-combination</u> irrespective of background levels.
Detailed Assessment of ecological impacts	5	This step is to consider the ecological impacts of AQ on the interest features of the designated site and is not based only on numerical figures. If it is not certain whether sensitive features are located within the areas to be impacted, a site visit may be helpful to determine this. For SSSIs, this step should provide all the information necessary, including any required mitigation, for the decision maker to determine if there would be an adverse effect on a SSSI. If Habitats Sites are impacted by the proposals, move to Step 6.	The following information is likely to be helpful for the decision maker: Is the sensitive feature(s) located within the pollution footprint? Should it be there for the site to meet its Conservation Objectives or is there some other, natural reason (e.g. hydrology), why the sensitive feature(s) would not be expected to occur there? Check APIS Trends Tab for reasonable expectation on whether background pollution may be decreasing or not. Habitats that have already been subject to high background nitrogen deposition can develop tolerance to further deposition. This cannot be used to justify further exceedance as it would undermine conservation objectives to reverse decline. You should consider predicted effects on

			the species richness of a habitat against the site's conservation objectives.
Appropriate Assessment (AA) for habitats sites	6	The competent authority to undertake their AA to conclude whether or not there will be an adverse effect on integrity (AEOI) of habitats sites. Any mitigation proposed should also be assessed at this point. Should the AA conclude that the proposal would have an AEOI that cannot be excluded with mitigation measures, consider the derogation route of the HRA process. Should compensation measures be required under derogation, please contact Natural England for specific advice. Note: If an AA has been undertaken of the proposals <u>alone</u> and concluded that there will not be an adverse effect on integrity, if there are residual impacts that are not fully mitigated, these will need to be considered in combination with other plans or projects	Where mitigation is required to enable a conclusion of no adverse effect on integrity to be reached the AA must be able to show that mitigation measures can be relied upon to avoid adverse effects over the full lifetime of the project (ie construction, operation and decommissioning where relevant). To be viable, such measures should be effective, reliable, timely, guaranteed and of sufficient duration. The assessment of such measures should be supported by evidence. When deciding on whether the proposals set out in the NSIP will have an adverse effect on Integrity on a Habitats Site, the Conservation Objectives and any supplementary advice should be taken into account. Including whether the site is already exceeding the environmental thresholds for ammonia, nitrogen oxides and nitrogen deposition and has a restore conservation objective.

Mitigation measures

If you cannot conclude there is no adverse effect, the applicant will need to apply mitigation measures. Measures will only be appropriate if you can quantify their effectiveness in reducing emissions on the protected site. You should check that mitigation measures are in place to avoid adverse effects on site integrity over the lifetime of the project.

Mitigation may include measures that:

- the applicant volunteers
- you impose through formal conditions or restrictions in any permission or authorisation – these may be different or stricter measures than ones proposed by the applicant

Examples could include:

- relocation or redesign of developments to avoid impacts on protected sites
- control of other emissions of the same pollutants with an overlapping effect
- a change in stack height for industrial processes
- Euro 6 standards for construction machinery
- adding wooded shelterbelts, trees, green walls and hedges to limit dispersal of emissions, as long as these measures in themselves would not negatively impact the protected site

Table 2: Industrial air pollution screening distances

Emission source	Distance for SSSIs	Distance for habitats sites
Industrial developments	2km	5km
General combustion processes (under 20MW energy input)	500m	500m
General combustion processes (20MW to 50MW energy input)	2km	2km
General combustion processes (over 50MW energy input)	2km	10km
Mechanical and biological waste treatment	500m	500m
Landfill waste	2km	2km
Compost (under 500 tonnes maximum annual operational throughput)	500m	500m
Compost (500 to 75,000 tonnes maximum annual operational throughput)	1km	1km
Compost (over 75,000 tonnes maximum annual operational throughput)	2km	2km
Airports, helipads and other aviation proposals	5km	5km
Oil and gas exploration and extraction	500m	500m
Quarries	200m	200m
Other industrial developments causing air pollution	500m	500m

Additional advice

Common Standards Monitoring¹ is used to define the ecological condition of a protected site. It is undertaken on a broader level and does not currently consider air quality impacts. The relevant benchmark for assessing impacts is the critical thresholds. Therefore, the existing status of a designated site should not be the sole reason for judgement on potential impact.

For many protected sites, the current background pollution may already be exceeding the relevant critical load/level from a different source type to the project being assessed (e.g. where the main source of background exceedance is due to agriculture, but the proposal is an industrial project). Proposals must consider their own impacts against the relevant environmental thresholds. There are many reasons why background levels are high, but the conservation objective is to 'maintain or restore' air pollutants to within these benchmarks. The objective would be undermined by proposals that add further emissions, including if it compromises any strategic initiatives to reduce air pollution levels.

You must determine if there is evidence that the increased emissions represent a measurable risk and could compromise the strategic initiatives. You would need to consider information on:

¹ [HYPERLINK "https://jncc.gov.uk/our-work/common-standards-monitoring/"](https://jncc.gov.uk/our-work/common-standards-monitoring/) [Common Standards Monitoring | JNCC - Adviser to Government on Nature Conservation](#)

- the extent to which any declining national trends in air pollution, or strategic initiatives to tackle emissions affecting the site more locally, might otherwise lead to improvements
- the rate at which such improvements are anticipated
- the extent of the impacts of a plan or project, and whether those impacts can properly be considered temporary and reversible

If the affected area is small, consider the risk to site integrity proportionally. For example, how important is the area in terms of rarity, location, distribution, vulnerability to change and ecological structure. If it is a supporting habitat, consider its importance to the designated species on the site. Consider any site survey information that may provide evidence of existing impacts.

Emissions from road transport (if applicable):

Emissions from road transport may be an operational impact or be limited to the construction phase of proposals. Roads on the affected road network that lie within 200m of a designated site should be considered. If all affected roads are further than 200m from a protected site, then there is no likely significant effect (habitats sites) or no impact (SSSIs) on protected sites from air pollution

Improvements in vehicle technology and a move to further electrification of the vehicle fleet will, over time, result in lower background levels of nitrogen deposition and nitrogen oxide pollution near to roads. As most sites are currently over the relevant thresholds and have a “restore” objective, this should be noted as a “retardation” of the restore objective and expressed in months and years. Retardation of less than one year is acceptable as air quality is considered against an annual average. Please note that ammonia impacts cannot be assessed in this manner as there is no certainty of a declining trend.

Defra Emissions Factor Toolkit

The Defra Emission Factor Toolkit (EFT) allows for gradual introduction of electric vehicles into the fleet (cars and LGVs) up to 2050. These are the emission factors we advise that NSIPs should be using (which we advise should also consider ammonia emissions as well as NO_x – using one of three sets of emission factors available). However, the User Guide to the EFT highlights that calculation tools only support assessment years 2018 up to 2030, reflecting that predictions and assumptions beyond then become less certain. Where EFT calculated emissions are to be used after 2030 to inform air quality assessments, the EFT indicates that appropriate caveats around the limitations of the analysis must be included to accompany the assessment. We therefore advise that emission factors no later than 2030 are used for HRAs– which would mean percentages of EVs are at predicted 2030 levels. A key concern is that, although EVs themselves have no tailpipe emissions, and the percentage of them will increase, the remaining combustion engine vehicles on the road may become more polluting as they age as selective catalytic reduction technology may create ‘ammonia slip’ over time. Ammonia slip is the unreacted ammonia (NH₃) that escapes from a selective catalytic reduction (SCR) or selective non-catalytic reduction (SNCR) system used to reduce NO_x in exhaust gases.

Motorways within the affected road network

There is potentially an added complexity to the need for in-combination assessments when considering traffic on motorways, as including these roads can mean that the assessment takes

account of traffic growth related to strategic factors or long range (external) trips that are independent of the specific plan or project and neighbouring plans or projects. These roads are strategically important and tend to have high volumes of traffic as well as being well represented in traffic models. The air quality assessment should therefore include traffic flows on these roads, but the external trips can be excluded from the initial screening assessment. A justification and explanation of which journeys are included and excluded in the traffic model should be provided.

The conclusions reached on the air pollution impacts of the HRA must be incorporated into the wider HRA conclusions for other impact pathways identified for the proposals.

How to Use this Advice in Decision Making

Provided you have followed the above advice and have been able to conclude there would be no adverse effects on any protected sites we would be able to agree with your decision to authorise the project

Solar farms have the potential to greatly increase the biodiversity value of a site, especially on land which was previously intensively managed. Research indicates that solar farms managed specifically for biodiversity show significant increases in plants, invertebrates, and birds, compared with sites which are not¹. Consequently, the implementation of good design and management on solar sites can result in significant environmental enhancements beyond that which is required through biodiversity net gain².

This guidance has been developed by the Yorkshire and Northern Lincolnshire Area Team in collaboration with national specialists, and is intended to provide an overview of recommended practices to enhance biodiversity on solar farms, including:

- The creation of habitat on site, within the margins and around the array.
- Conservation grazing/mowing to manage created habitat.
- The layout of the array and supplementary infrastructure.

Proposed enhancements should aim to achieve environmental and biodiversity net gain in line with the ambition set out in the Environmental Improvement Plan and any other relevant measures and targets, including statutory targets set under the Environment Act 2021 or elsewhere.

Further information regarding each of these methodologies can be found in the footnoted sources. These practices are evolving as further research emerges and are therefore subject to change. The Biodiversity Management Plan should be designed to fit the physical and ecological attributes of the site, tying in with existing habitats and species of value³.

Please note that this information is provided to inform the design and management of biodiversity enhancements within solar schemes only. Potential environmental impacts associated with solar farms, including designated sites and protected species impacts, should be adequately addressed in the application for planning permission / Development Consent prior to consideration of enhancements, in line with established principles. Natural England will provide site-specific advice on direct and indirect impacts to designated sites and protected species, where relevant.

1.0 The creation of on-site habitat

It is estimated that once PV panels have been installed 70-95% of ground surface remains available to contribute to biodiversity targets. If correctly managed, these areas can be used to develop botanically diverse habitats around, and where circumstances allow, beneath the panels. The identification of target habitats should consider the existing natural habitats on and around the site and the objectives of local strategies including the Local Nature Recovery Strategy (LNRS).

1.1 Planting between/around panels

The conversion of land to solar often offers the opportunity for the development of grassland habitat around the array. This may include maintaining or extending existing habitat, or creating new habitat. Common approaches include seeding flowering strips for pollinators, creating rough tussocky grasslands margins, and the establishment of traditional grazing meadows⁴.

Prior to habitat creation, soil tests and botanical surveys should be undertaken to ensure the chosen habitat is suitable for the context. The soil samples will dictate where to locate, and the nature of, the biodiversity enhancements. Determining the level of modification of the starting grassland will aid in projecting the level of management which will be required, as seed sown in modified and semi-improved grassland can become rapidly outcompeted by grasses if unmanaged⁵. Ex-arable sites may not be suitable for immediate conversion to wild flower meadow where higher nutrient values still exist.

¹ Parker et al (2021) *Realising the Biodiversity Potential of Solar Farms*

² DESNZ (2025) *National Policy Statement for Renewable Energy Infrastructure (EN-3)*

³ BRE National Solar Centre (2014) *Biodiversity Guidance for Solar Developments*

⁴ Parker et al (2021) *Realising the Biodiversity Potential of Solar Farms*

⁵ Foresight (2024) *Nature Recovery Blueprint for Solar Sites*

In the creation of grassland habitat, plants of local provenance should be selected, and planted on a site-by-site basis in accordance with local growing conditions. Successfully establishing species-rich grassland on previously intensively managed farmland is challenging, and in the short/mid-term less diverse, transitional habitat will likely establish. As the habitat develops, consistent management will allow for continued further enhancement. Diverse sward has been shown to establish quicker if sufficient spacing (>3m) between panels is used within the array (see section 3.1).

1.2 Planting beneath solar panels

The microclimate created by the shading effect of the panels mean that the same planting regime cannot necessarily be used under the panels and within the margins, and seed mixes will need to be selected according to the specific conditions. Shading from both rain and sun creates an environment unsuitable for many grassland species. The seeding of grassland species beneath panels has been met with varying degrees of success, and in some instances plants can fail to establish⁶. An unpublished 2025 study from 124 UK solar farms indicates that typically low diversity grassland habitat establishes beneath the solar panels (Solar Habitat, 2025).

However, where conditions allow, e.g. panels are set higher and light levels are greater, it may be possible to establish more diverse habitats. There is emerging evidence that a range of shade-tolerant species are able to establish under panels⁷. If appropriate for the soil type and consistent with the site's objectives, selecting species which require less direct sun and are naturally low growing is encouraged. With sufficient management, a range of woodland, herbs, ferns, and some grassland species have been found to establish under panels⁸.

1.3 Site preparation and management

Site preparation should generally begin in spring, and consist of an initial mowing phase followed by weed removal, repeated several times over the summer to prevent annual weeds and grasses consolidating. The final sowing should occur in autumn, when wildflowers would naturally seed and are less likely to require watering. Seed can efficiently be sown directly on the bare ground exposed immediately after the array has been installed, post-harrowing, though experimentation with pre-installation sowing is encouraged. Using companion plug plants in key locations to enhance seeding has been shown to significantly increase the likelihood of plants establishing, as agricultural grasses have been shown to outcompete seeded species in nutrient-rich post agricultural context.

Soil compaction of the site can occur during the construction phase⁹. Care should be taken to ensure that the site, including areas to be managed for biodiversity, is not adversely impacted as soil compaction will impact the viability of future planting. General guidance for protecting soils during development is available in Defra's [Code of Practice for Soils on Construction Sites](#).

Aftercare management is essential to ensure establishment of species rich grassland, primarily through maintaining a suitable grazing/mowing regime. If using grazing, it is important to maintain an appropriate density to allow the plants to develop. Low intensity spring and winter grazing has been shown to increase plant diversity on solar sites and is therefore welcomed. Summer grazing has been shown to have a negative effect on plant diversity and is discouraged^{10,11}. If mowing, the creation of varied sward height is encouraged to increase structural diversity. The cessation of grazing from May to September (depending on seed mix) will allow wildflowers to flower and set seed, reducing the need for reseeding in later seasons. The grazing/mowing regime should be secured and monitored throughout the lifetime of the project.

⁶ Solar Energy UK (2024) *Solar Habitat Report: Ecological trends on solar farms in the UK*

⁷ Montag et al (2016) *The Effects of Solar Farms on Local Biodiversity: A Comparative Study*

⁸ Solar Energy UK (2024) *Solar Habitat Report: Ecological trends on solar farms in the UK*

⁹ ADAS (2023) *The impact of solar photovoltaic (PV) sites on agricultural soils and land quality*

¹⁰ Blaydes et al (2021) *Opportunities to enhance pollinator biodiversity in solar parks*

¹¹ Montag et al (2016) *The Effects of Solar Farms on Local Biodiversity: A Comparative Study*

The monitoring of botanical diversity should be factored into the ongoing management of the site, with reseeded considered where appropriate. Whilst species will colonise naturally, periodic reseeded every few years may be required to maintain plant biodiversity and ensure establishment. Pernicious weeds can proliferate beneath solar panels if the ground is bare. Using a combination of spot treatment for weeds, targeted cutting throughout the growing season, and the planting of appropriate seed mixes to minimise bare ground coverage, these species can be managed long term, without the need for the extensive herbicide use¹². See GOV.UK's [guidance](#) on establishing species-rich grassland for further information.

Note that this advice does not apply to the management of breeding and non-breeding bird mitigation areas, which will likely require different management.

2.0 Boundary features

The retention, enhancement, and creation of boundary features such as hedgerows, treelines, ditches, and field margins offer significant opportunities for biodiversity enhancement on solar farms, in addition to creating wildlife corridors within solar sites and to other habitats.

2.1 Hedgerows

Hedgerows provide a multitude of biodiversity benefits in addition to managing visual impacts via screening, a common requirement of solar planning applications. Given the post-agricultural context on which many solar sites are located there are often opportunities for the establishment/enhancement of existing hedgerows.

Hedgerows should be developed using native species such as hawthorn, hazel, field maple, blackthorn, ash, holly, and elder. Locally relevant species should be selected in the first instance. The UK planting season is between November and March, with November and December being the preferred months. Once the hedgerow is well established, a 3-5 year cutting regime should be implemented which manages panel shading while leaving long periods for growth. For hedges of high wildlife value this cycle may be up to 7-10 years, wherein additional laying should be considered. When cutting is required, it should take place in January/February to allow for flowering and berry production. See Natural England [guidance](#) on hedgerow planting for further information.

2.2 Field margins

Solar sites often include access routes between the array and the site perimeter. These marginal areas, when used in combination with hedgerow and tree planting, offer the greatest potential for biodiversity enhancement in the array area. The establishment of grassland habitat within these margins should follow the methodology detailed in section 1, though these sites are less constrained than the panel-adjacent areas so a greater range of habitats and species can be considered¹³. The creation of tussocky grassland on the margins alongside the security fence is a common approach which is generally low maintenance and beneficial for a variety of different species, including foraging birds of prey, ground nesting birds, and wintering invertebrates.

Margins should be around 7-10 metres wide to leave sufficient space for access and the development of functional habitat¹⁴.

2.3 Ponds

Creating ponds, scrapes and other wetland features in low-lying wet areas of the site, which may otherwise be unsuitable for construction, is encouraged. Features implemented to manage site drainage such as

¹² Montag et al (2016) *The Effects of Solar Farms on Local Biodiversity: A Comparative Study*

¹³ Parker et al (2022) *Realising the Biodiversity Potential of Solar Farms*

¹⁴ BRE National Solar Centre (2014) *Biodiversity Guidance for Solar Developments*

swales can also be managed for wildlife, provided they are not fed by surface water from fields treated with agricultural inputs such as fertilizers or pesticides¹⁵.

3.0 Array structure

The layout and type of panels can determine the viability of habitat creation within the array area, and careful panel siting can greatly improve habitat connectivity within the site.

3.1 Panel layout

The use of a greater distance between panels will result in increased sunlight and rainwater distribution, which will in turn support the development of more diverse habitat structure for plants and wildlife. The siting of panels should include wide margins and boundary features, as detailed in section 2.0, in addition to any dedicated areas for biodiversity enhancement. Significant increases in biodiversity have been recorded when sufficient spacing between panels is used within the array. Distances of 3m+ have been shown to lead to a significant increases in amphibian, avian, and botanical diversity.¹⁶

Studies show that while solar farms can improve farmland bird diversity, evidence suggests ground nesting and wading birds are unlikely to forage or nest on, or in close proximity to, solar sites¹⁷. Therefore, the scheme design should avoid visual impacts to breeding and non-breeding birds though appropriate siting away from high-use areas. Where impacts cannot be avoided, mitigation may include provision of larger areas of suitable habitat for these species. Natural England will provide site-specific advice where species associated with designated sites may be impacted by a proposed development.

3.2 Panel height

Consideration should be given to the most suitable panel height in the scheme design, accounting for relevant species and habitats. Generally, a panel height of at least 2m at the lowest point may be more suitable to facilitate varied vegetation development and wildlife mobility¹⁸. This height enables the growth of a greater range of vegetation, enhances sunlight and rainwater distribution, improves soil quality, and generates diverse microclimates able to support a broader range of species. A greater panel height can also increase ease of access for habitat management if managing the sward via mechanical means.

Studies show that a panel height of 1.2m at the lowest point can lead to a 90% reduction in biomass output directly beneath the panels, compared with a 30% reduction at 2m¹⁹. The use of tracking solar panels can further minimise the microclimate effect of panel shading.

3.3 Fencing

Security fencing should be used strategically to minimize habitat fragmentation and protect the site's assets. Wildlife-friendly fencing which incorporates a 10-20cm gap between the base of the fence and the ground will enable the movement of mammals and other wildlife with minimal compromise for site security²⁰.

When designing habitat enhancements a site-specific approach is required – there should be consideration of the varying requirements of protected species who may utilize the site. The use of low-profile fencing around habitat creation areas for ground-nesting bird species has been shown to improve bird counts. This is likely due to the increased availability of protected nesting areas²¹. Therefore, allowing large mammal access may not be appropriate in an area designed to provide habitat for ground-nesting birds.

¹⁵ Parker et al (2022) *Realising the Biodiversity Potential of Solar Farms*

¹⁶ Peschel et al (2019) *Solar parks – profits for biodiversity*

¹⁷ Copping et al (2024) *Solar farm management influences breeding bird responses in an arable-dominated landscape*

¹⁸ Benbouzid et al (2025) *Evaluating the Potential for Improving Biodiversity in Solar Farms*

¹⁹ Adeh et al (2019) *Remarkable agrivoltaic influence on soil moisture, micrometeorology and water-use efficiency*

²⁰ BRE National Solar Centre (2014) *Biodiversity Guidance for Solar Developments*

²¹ Golawski et al (2025) *Increased bird diversity around small-scale solar energy plants in agricultural landscape*

4 Other advice

4.1 Biodiversity Net Gain

Biodiversity Net Gain (BNG) has been designed to leave habitats for wildlife in a measurably better state than they were prior to development. Developments that fall under the BNG requirement must deliver a biodiversity uplift of at least 10%, as measured by the statutory biodiversity metric. Enhancing the margins and sub-panel area for biodiversity can contribute to the delivery of BNG up to, or beyond, the 10% requirement.

When designing the BNG scheme for a solar site, careful consideration should be given to which habitats will be able to establish under and between the panels. Where the site is formerly arable or pasture, Other Neutral Grassland in poor/moderate condition has been found to establish in the sub-panel area²². Where new habitat is included within a scheme it is worth considering multifunctional or additionality benefits of the design. Guidance has been developed on what mitigation or enhancement measures can also count towards the BNG calculation through environmental stacking.

4.2 Local Nature Recovery Strategy

Local Nature Recovery Strategies (LNRS) are county-level initiatives which aim to drive co-ordinated, practical, and focussed action for nature recovery across England. LNRS consist of a framework of prioritised actions and specific mapped measures which will be delivered through a number of mechanisms such as biodiversity net gain and agri-environment schemes, to contribute to strategic biodiversity enhancements specific to that locality. Local planning authorities must have regard to the LNRS when carrying out their duties. If consulted early in the site selection process, the LNRS may be able to help inform conscientious siting of the array, in addition to informing any other strategies which could contribute to the wider Nature Recovery Network. Beyond the Local Authority, the Local Nature Partnerships contact may be able to provide site-specific advice.

4.3 Green Infrastructure

Green Infrastructure (GI) is defined as a network of multi-functional green and blue spaces and other natural features, urban and rural, which are capable of delivering a wide range of benefits for both humans and nature. Natural England has developed the Green Infrastructure Framework – a national standard to guide the planning, design, and maintenance of green infrastructure in England. This framework provides guidance for integrating natural elements into major developments. Consideration of GI principles in solar scheme design may support multi-functional outcomes and Natural England can provide GI advice for ‘high opportunity’ developments. You may wish to consult the Green Infrastructure Map when considering potential connectivity to existing green spaces.

²² SEUK (2022) *Best Practice Guidance: Increasing Biodiversity at All Stages of a Solar Farm's Lifecycle*

Officer: [REDACTED]
Tel: [REDACTED]
Email: [REDACTED] [@northlincs.gov.uk](mailto:[REDACTED]@northlincs.gov.uk)

North Lincolnshire Council

www.northlincs.gov.uk

Church Square House
30-40 High Street
Scunthorpe
North Lincolnshire
DN15 6NL

22/06/2026

Environmental Services
Infrastructure Decisions and Applications Service
Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough
SL1 4PN

North Lincolnshire Planning Application Reference: DCO/2026/8

Planning Inspectorate Reference: EN0110032

Project: Humberhead Solar

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

Proposed application by Humberhead Solar Limited (the applicant) for an Order granting Development Consent for Humberhead Solar (the proposed development)

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

Officer: Matthew Gillyon

Thank you for your email dated 27th May 2026 giving North Lincolnshire Council (NLC) the opportunity to comment on the Humberhead Solar Scoping consultation.

I can confirm that after consultation with our internal technical consultees that North Lincolnshire Council has no comments or objections to raise in respect of the information submitted with the proposed development not likely to result in any significant impact upon North Lincolnshire.

Kind Regards

[REDACTED]



Senior Planning Officer
North Lincolnshire Council

From: [REDACTED] g
To: [Humberhead Solar](#)
Cc: [REDACTED]
Date: 27 May 2026 12:48:07
Attachments: [image003.png](#)
[image004.png](#)
[image002.png](#)

Hi

NGN has a number of gas assets in the vicinity of some of the identified “site development” locations. It is a possibility that some of these sites could be recorded as Major Accident Hazard Pipelines(MAHP), whilst other sites could contain High Pressure gas and as such there are Industry recognised restrictions associated to these installations which would effectively preclude close and certain types of development. The regulations now include “Population Density Restrictions” or limits within certain distances of some of our “HP” assets.

The gas assets mentioned above form part of the Northern Gas Networks “bulk supply” High Pressure Gas Transmission” system and are registered with the HSE as Major Accident Hazard Pipelines.

Any damage or disruption to these assets is likely to give rise to grave safety, environmental and security of supply issues.

NGN would expect you or anyone involved with the site (or any future developer) to take these restrictions into account and apply them as necessary in consultation with ourselves. We would be happy to discuss specific sites further or provide more details at your locations as necessary.

If you give specific site locations, we would be happy to provide gas maps of the area which include the locations of our assets.

(In terms of High Pressure gas pipelines, the routes of our MAHP’s have already been lodged with members of the local Council’s Planning Department)

Kind regards,

[REDACTED]

Admin Assistant – Customer Operation Support
Northern Gas Networks

[REDACTED]

www.northerngasnetworks.co.uk
facebook.com/northerngasnetworks
twitter.com/ngngas



Nunburnholme with Kilnwick Percy Parish Council

32

e-mail: Clerk@NunburnholmeKPParishCouncil.gov.uk

Website: <https://nunburnholmewithkilnwickpercyparishcouncil.eastriding.gov.uk>

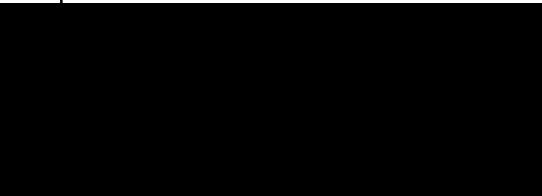
Wednesday 17th June 2026

Dear Georgia,

Please find below a summary of the comments made and concerns raised at an Extraordinary Meeting of Nunburnholme with Kilnwick Percy Parish Council held on Wednesday 10th June 2026.

The Extraordinary Meeting was attended by six of our seven Parish Councillors, together with twelve members of the public. By way of a comparison, in the little over a year that I have been Clerk I haven't seen one member of the public attend any of our bi-monthly Meetings.

Kind regards,



Clerk to Nunburnholme with Kilnwick Percy Parish Council.

Thank you for including us in your pre-planning application consultation; we are assuming the Local Authority, East Riding Yorkshire Council (ERYC) and yourselves will cover all statutory aspects in terms of core planning and design, environmental and landscape assessment and technical and infrastructure details.

Although proposed construction sites lie just outside our Parish boundary there will be impacts for us. We are a rural community and our concerns centre on maintaining that character so we would be grateful for your careful consideration of the following:

General: The need to replace fossil fuels is generally accepted and there seems to be public preference for solar over wind farms. However, we feel there is an ad-hoc approach; multiple projects proposed individually rather than as a holistic, strategic regional plan, camouflaging long term impacts and scale of solar development, which is a concern. We would like to see an overall solar farm projection and plan.

Landscape and Visual Amenity: We are concerned about loss of agricultural and rural land - particularly the visual impact of the project; as we are on high land in the Wolds the visual aspect of solar arrays, glare from panels, fencing, power lines etc may be intrusive. We would hope to see screening and other mitigation measure in the planning application. In addition, we would oppose severing or extinguishing any public rights of way (PRoW) that connect with PRoW within our Parish. We feel that industrial, commercial, brownfield sites should be prioritised, but acknowledge those owning agricultural or wood land should not be excluded from opportunities to diversify their business model and employment opportunities are welcome.



Ecology/Heritage and Biodiversity: ERYC has aspirations for the Wolds to be listed as an Area of Outstanding Natural Beauty (AONB), supported by Natural England; our Parish sits within that. We would wish to see potential adverse impact on routes, corridors and migration pathways that our diverse wildlife rely upon fully addressed in your environmental assessment. Archaeological surveys, crop marks and excavations in and around proposed development sites and the 'cable route corridors' show much Iron Age, Roman and Medieval activity, which calls for sympathetic survey, excavation, documentation and preservation of artifacts. We know planning is at an early stage but feel there is dearth of information stating proven green benefits over the whole life of proposals, including decommissioning and recycling, and would like to see this explained in detail in future submissions.

Construction and Traffic Disruption: Being a rural area we are concerned about influx of heavy goods vehicles (HGV) on narrow rural, village roads and damage they might cause in transit through our Parish. We are also concerned about the hours such traffic may be planned for. We would appreciate consideration being afforded in your traffic management plan to these concerns and include HGV washing facilities to prevent mud on roads as well as the overall light impact on "dark skies, which is a key feature of the AONB ambitions.

From: [REDACTED]
To: [Humberhead Solar](#)
Cc: [REDACTED]
Subject: EN0110032 Humberhead Solar project - EIA scoping notification
Date: 15 June 2026 12:46:08

Hello,

I hope that this email finds you well. Apologies for the delayed response.

Pocklington Town Council have no comments to make on the above application.

Kind Regards,

[REDACTED]

Deputy Town Clerk

Pocklington Town Council

[REDACTED] [@pocklington.gov.uk](mailto:[REDACTED]@pocklington.gov.uk)

[REDACTED]

I work Mondays to Thursdays from 9am until 4pm. If you contact me outside of my working hours I will respond to your email on my next working day. If your query is urgent, please contact townclerk@pocklington.gov.uk.

[REDACTED]

From: [REDACTED]
Sent: 20 June 2026 17:33
To: Humberhead Solar
Subject: Scoping Opinion Consultation – Humberhead Solar Project

[REDACTED]

Dear Sir/Madam,

Seaton Ross Parish Council welcomes the opportunity to comment on the scoping request for the proposed Humberhead Solar development.

The Parish Council requests that the Environmental Statement (ES) gives full consideration to the following matters in relation to Seaton Ross:

- Landscape and Visual Impact: Effects on the open rural landscape, including views from the village, nearby dwellings, and public rights of way, supported by representative photomontages.
- Residential Amenity: Assessment of visual impact, glint and glare, and construction-related disturbance (noise, dust, traffic).
- Highways and Traffic: Impacts of construction traffic on local roads, routing, and safety.
- Ecology and Biodiversity: Impacts on habitats, hedgerows, and wildlife, with clear biodiversity net gain proposals.
- Agricultural Land: Identification of land classification and implications of the loss of productive farmland.
- Flood Risk and Drainage: Assessment of surface water management to ensure no increased flood risk locally.
- Cumulative Impact: Consideration of combined effects with other developments in the wider area.
- Mitigation: Clear proposals for landscaping, screening, and construction management.

While these topics are identified within the scoping material, the Parish Council emphasises that the assessment must clearly show how the development will affect Seaton Ross itself — including views from the village, traffic on local roads, and impacts on nearby homes.

The Parish Council requests that the ES provides sufficient detail to ensure the potential impacts on the parish and its residents are fully understood.

Yours faithfully,

[REDACTED]

Clerk to Seaton Ross Parish Council

From: [REDACTED]
To: [Humberhead Solar](#)
Subject: Re: EN0110032 Humberhead Solar project - EIA scoping notification
Date: 29 May 2026 09:03:20
Attachments: [REDACTED]

Hi Georgia

Thank you for taking the time to share these details with us.

I can confirm that Sphere Energy Connect has no assets in the vicinity of these works and have no comments to make at this time. We are a new IDNO business just entering the market and still completing Regulatory processes in order for us to operate an asset base within the UK.

Good luck with the project.

Thanks

[REDACTED]



[REDACTED] Head of Asset Management & Operations | Sphere
Energy Connect
[REDACTED]

Internal Use

From: Humberhead Solar <humberheadsolar@planninginspectorate.gov.uk>
Sent: 27 May 2026 16:01
To: Sphere Enquiries <enquiries@sphere-connections.co.uk>
Subject: EN0110032 Humberhead Solar project - EIA scoping notification

EXTERNAL SENDER: Be cautious, especially with links and attachments. Report phishing if suspicious.

Dear Sir/ Madam

Please see attached correspondence on the proposed Humberhead Solar project.

The applicant for the proposed development intends to make an application for Development Consent under the Planning Act 2008. The applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by 24 June 2026. The deadline is a statutory requirement that cannot be extended.

[REDACTED]

From: FS, Yorkshire and North East Area <yne@forestrycommission.gov.uk>
Sent: 24 June 2026 18:34
To: Humberhead Solar
Subject: Re: EN0110032 Humberhead Solar project - EIA scoping notification

[REDACTED]

Hello,

Thank you consulting the Forestry Commission about this proposal. As a Non-Ministerial Government Department, the Forestry Commission provides no opinion supporting or objecting to an application. Rather we provide advice on the potential impact that the proposed development could have on trees and woodland including ancient woodland.

We note that the Scoping Report identifies that one area of ancient woodland, recorded in Natural England's Ancient Woodland Inventory, is within approximately 110m of Humberhead Site 3-2, and that two veteran trees have been identified in close proximity to the boundary of Humberhead 4, but "no trees listed on the Ancient and Veteran Tree Inventory".

The Woodland Trust's Ancient Tree Inventory records one veteran tree located at approximately grid reference SE 7952 4637, within or close to site 1-1, and two ancient trees, and two veteran trees, close to or within site 2-3, close to grid reference SE 8672 4387, appearing to be on the site of the Medieval Village of Towthorpe.

There are also numerous areas of mixed deciduous woodland within the proposed sites, CRSC or adjacent to them. Some of these are isolated, fragmented woodlands within the landscape and are identified as Habitats of Principal Importance in the Priority Habitat Inventory.

Potential Impacts and Relevant Policy

Ancient Woodland

Ancient woodlands, ancient trees and veteran trees, are irreplaceable habitats. Ancient woodlands have great value because they have a long history of woodland cover, being continuously wooded since at least 1600AD with many features remaining undisturbed. This applies equally to Ancient Semi Natural Woodland (ASNW) and Plantations on Ancient Woodland Sites (PAWS).

Section 5.4.53 of EN1 – The Overarching National Policy Statement for Energy states:

“The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of any irreplaceable habitats, including ancient woodland, and ancient and veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists. ”

We would particularly refer you to further technical information set out in Natural England and Forestry Commission’s [Standing Advice on Ancient Woodland](#) – plus supporting [Assessment Guide](#) and [“Keepers of Time” – Ancient and Native Woodland and Trees Policy in England](#).

The Standing Advice states that proposals should have a buffer zone of at least 15m from the boundary of ancient woodlands to avoid root damage which can result in loss or deterioration of the woodland. Where assessment shows impacts are likely to extend beyond this distance, a larger buffer zone is likely to be required. For example, the effect of air pollution from development that can result from a significant increase in traffic or dust from construction.

The Standing Advice and the recommended buffer zones are currently under review and are likely to be updated recommending that the minimum buffer requirement will be increased. All buffer zones, including those planned for non-ancient woodland, and non-ancient or veteran trees, should consider the distance required to protect existing trees at maturity, not just at their current size.

Ancient Trees and Veteran Trees

Ancient trees and veteran trees are also irreplaceable habitats. The Natural England and Forestry Commission Standing Advice states that for ancient or veteran trees the buffer zone should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5 metres from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter. This will create a minimum 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).

Habitats of Principal Importance (Priority Habitats)

Fragmentation is one of the greatest threats to the Habitat of Principal Importance, mixed deciduous woodland. Loss of habitat connectivity is a particular concern where the woodland could become isolated in its landscape and surrounded by development on several sides. These woodlands can also 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 and dust, particularly during the construction phase of a development.

Biodiversity Duty and Policy Context

Under Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006, as amended by the Environment Act 2021, the biodiversity duty requires public authorities (including when exercising their functions under the planning system) to have regard to the purpose of conserving and enhancing biodiversity.

The Environmental Statement should demonstrate consideration of the Environment Act 2021 biodiversity targets, including the statutory targets to:

- Halt the decline in species abundance by 2030
- Increase species abundance so that by 2042 it is greater than in 2022, and at least 10% greater than 2030
- Improve the Red List Index for England species extinction risk by 2042, compared to 2022 levels

- Restore or create in excess of 500,000 hectares of wildlife-rich habitats outside of protected sites by 2042. A new interim target was also set within the EIP23 to restore or create 140,000 hectares of a range of wildlife-rich habitats outside protected sites by 2028.

These targets are directly relevant to trees, woodlands, hedgerows and associated habitats within the scheme.

Government policy strongly supports **increasing tree and woodland cover in England**, including commitments to:

- Reach **16.5% tree and woodland cover in England by 2050** (Tree Action Plan for England)
- Increase woodland creation rates to support net zero and biodiversity objectives
- Deliver landscape-scale nature recovery through the Environmental Improvement Plan 2023
- Contribute to the England Trees Action Plan ambition to expand woodland creation and tree canopy cover

Where tree, woodland or hedgerow loss is unavoidable, the Forestry Commission encourages the Applicant to provide robust justification and to consider significant compensatory woodland creation, planting of trees outside of woodlands, hedgerow creation and habitat enhancement measures that exceed the area of loss or deterioration, and contribute positively to local tree, hedgerow and woodland networks and landscape-scale connectivity.

The Environmental Statement should clearly quantify:

- Temporary tree/woodland/hedgerow removal
- Permanent tree/woodland/hedgerow removal
- Tree/woodland/hedgerow retained
- Areas subject to planting, restocking or natural regeneration
- Proposed compensatory woodland creation, planting of trees outside of woodlands, hedgerow creation and habitat enhancement measures

This information is necessary to assess the scheme in the context of national policy objectives relating to climate mitigation, biodiversity recovery and woodland and tree canopy cover expansion.

Conclusion

The Forestry Commission considers that ancient woodland, and woodland and hedgerow Habitats of Principal Importance should remain scoped into the Environmental Impact Assessment.

The Environmental Statement should demonstrate full consideration of statutory biodiversity duties, national woodland expansion policy and environmental improvement targets, and should provide sufficient information to assess direct, indirect and cumulative effects on these receptors.

What is most important to the Forestry Commission is that there will be no loss or detrimental impact as a result of this proposed development on ancient woodland, ancient trees or veteran trees as mentioned above, with an overall net gain delivered for tree, hedgerow and woodland cover, and the biodiversity of their associated habitats.

We hope these comments are helpful to you. If you have any further queries please do not hesitate to contact the Forestry Commission at the email address provided.

Many thanks,

Local Partnership Advisor

Yorkshire and North East Area

Foss House, King's Pool
1-2 Peasholme Green
York
YO1 7PX

Tel 0300 067 4900

From: Humberhead Solar <humberheadsolar@planninginspectorate.gov.uk>

Sent: 27 May 2026 10:18

To: Humberhead Solar <humberheadsolar@planninginspectorate.gov.uk>

Subject: EN0110032 Humberhead Solar project - EIA scoping notification

This Message originated outside your organisation.

Dear Sir/ Madam

Please see attached correspondence on the proposed Humberhead Solar project.

The applicant for the proposed development intends to make an application for Development Consent under the Planning Act 2008. The applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by 24 June 2026. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards,

Georgia Pathy



Georgia Pathy (MIEnvSc)

Environmental Advisor

Planning Inspectorate

www.gov.uk/pins

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[REDACTED]

From: Planning Consultation Mailin <planningconsultation@yorkshirewater.co.uk>
Sent: 01 June 2026 08:59
To: Humberhead Solar
Subject: EN0110032 - Humberhead Solar Development

Follow Up Flag: Follow up
Flag Status: Completed

[REDACTED]

Good Morning,

Thank you for the recent inspectorate letter with regards to this enquiry, however after initial problem with the developer weblink via the company's security system, the link is now working but disappointing just to see 3 page basic document. I was expecting to see more details including the area in Yorkshire and what public infrastructure is going to be affected (sewers, water mains, waste water treatment works, clean water treatment works, groundwater source protection zones). Without the additional information, YW is unable to provide any comments on this proposals until more details have been supplied by either the agent and/or applicant.

Kind regards

[REDACTED]
Town Planning Co-ordinator

Want to know a bit more about Yorkshire Water? Our website is full of useful info, from how to apply for a water meter to planning your next walk at one of our beautiful reservoirs - it's all at yorkshirewater.com

Need to talk to us? For the best way to get in touch with us, go to yorkshirewater.com/contact

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