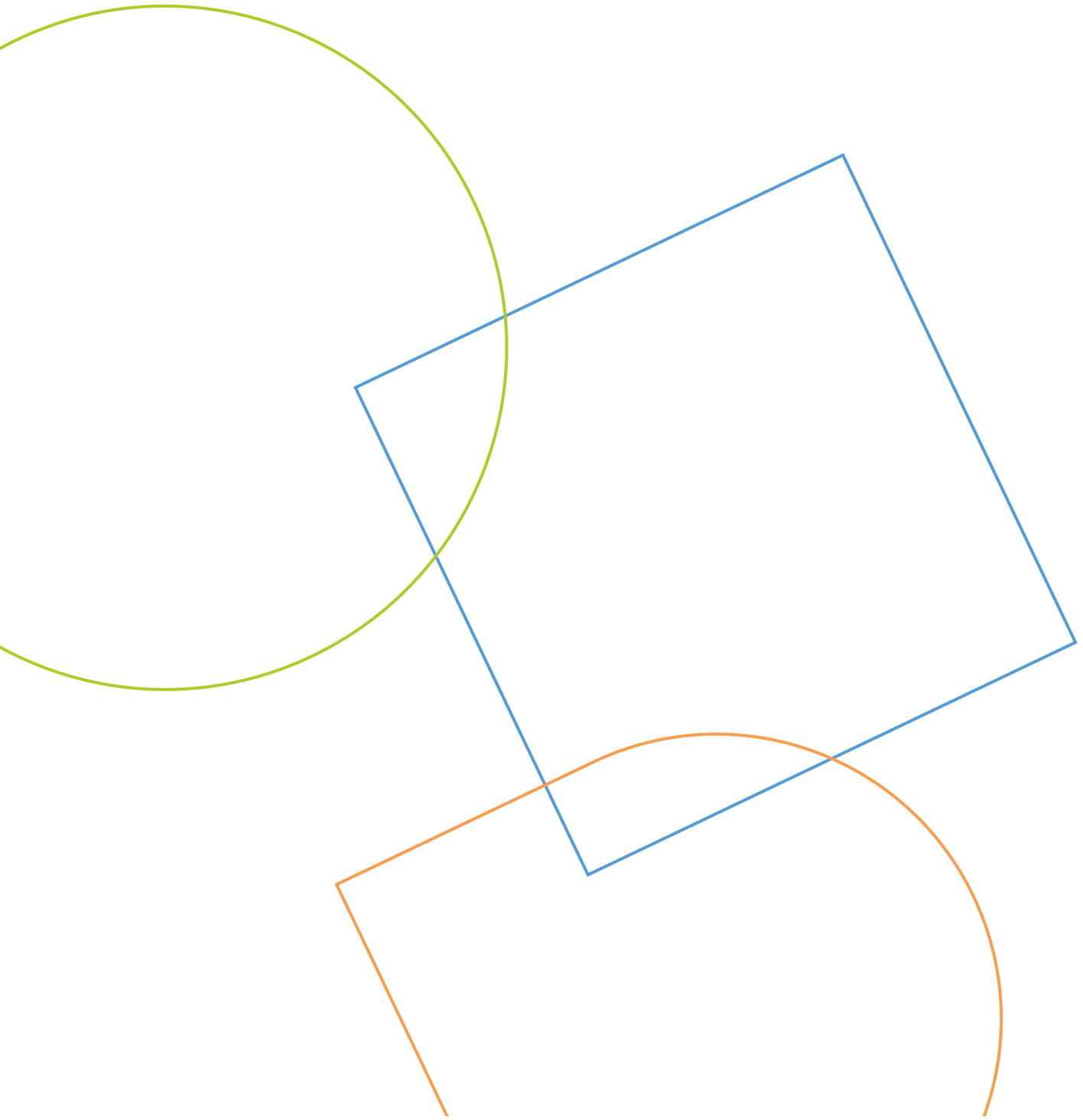




Westfield Energy Conservation Park



EIA Screening Opinion Request

Westfield Energy Conservation Park

Lightrock Power Limited



February 2025

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EIA Screening Opinion Request

Westfield Energy Conservation Park

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Contents

1	INTRODUCTION	1
2	EIA REGULATIONS	2
3	SITE CONTEXT	3
3.1	SITE DESCRIPTION	3
3.2	PLANNING DESIGNATIONS	4
3.3	ENVIRONMENTAL BASELINE CONDITIONS	4
3.4	CUMULATIVE DEVELOPMENT	5
4	PROPOSED DEVELOPMENT	7
5	ENVIRONMENTAL IMPACT ASSESSMENT SCREENING METHODOLOGY	10
5.1	INTRODUCTION	10
5.2	ESTABLISHING BASELINE	10
5.3	IDENTIFYING THE POTENTIAL FOR SIGNIFICANT EFFECTS	10
5.4	MITIGATION	11
6	ENVIRONMENTAL SCREENING ASSESSMENT - POTENTIAL ENVIRONMENTAL EFFECTS	12
6.1	SITE ACCESS AND TRANSPORT	12
6.2	LANDSCAPE AND VISUAL	13
6.3	ECOLOGY	16
6.4	HISTORIC ENVIRONMENT	18
6.5	FLOOD RISK	20
6.6	AGRICULTURAL LAND	21
6.7	AIR QUALITY	21
6.8	NOISE AND VIBRATION	22
6.9	SUMMARY	23
7	CONSIDERATION OF SCHEDULE 3 OF THE EIA REGULATIONS	24
7.2	CHARACTERISTICS OF DEVELOPMENT	24
7.3	LOCATION OF DEVELOPMENT	26
7.4	THE POTENTIAL IMPACT	27
8	CONCLUSION	29

Appendices

APPENDIX 1 SITE LOCATION PLAN

APPENDIX 2 PHOTOS OF DESIGNATED HERITAGE ASSETS

1 Introduction

1.1.1 In accordance with Regulation 6 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ('EIA Regulations'), this report provides a formal request for a screening opinion from North Hertfordshire District Council ('the Council') on behalf of Lightrock Power Limited ('the Applicant'), as to whether an EIA is required for 'the Proposed Development' on land south of A507 at Westfield Common ('the Site'). The Proposed Development is for a Battery Energy Storage System (BESS) and co-located solar farm, associated infrastructure, access, biodiversity enhancement and landscaping. The Site is approximately 206ha, although the footprint of the Proposed Development will be substantially less.

1.1.2 Regulation 6 requires the following information to form part of a request for a screening opinion:

(a) a plan sufficient to identify the land;

(b) a description of the development, including in particular—

(i) a description of the physical characteristics of the development and, where relevant, of demolition works;

(ii) a description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;

(c) a description of the aspects of the environment likely to be significantly affected by the development;

(d) to the extent the information is available, a description of any likely significant effects of the proposed development on the environment resulting from—

(i) the expected residues and emissions and the production of waste, where relevant; and

(ii) the use of natural resources, in particular soil, land, water and biodiversity; and

(e) such other information or representations as the person making the request may wish to provide or make, including any features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.

1.1.3 This EIA Screening Request will therefore provide the following:

- **Section 2:** EIA Regulations;
- **Section 3:** Site Context including the environmental baseline conditions, cumulative development;
- **Section 4:** Proposed development including construction, operation, decommissioning and grid connection;
- **Section 6:** Potential Environmental Effects;
- **Section 7:** Consideration of Schedule 3 of the EIA Regulations;
- **Section 8:** Conclusion.

2 EIA Regulations

- 2.1.1 Development may be categorised as ‘EIA Development’ either because it is of a type which falls within the description set out in Schedule 1 of the EIA regulations or falls within a description of development in Schedule 2 and is likely to have significant environmental effects on the environment by virtue of its nature, size, or location.
- 2.1.2 The Proposed Development does not fall within any of the descriptions of development set out in Schedule 1, but it is considered to fall within Paragraph 3 (a) of Schedule 2 which concerns ‘*Industrial installations for the production of electricity, steam and hot water (unless included in Schedule 1)*’.
- 2.1.3 Given that the footprint of the Proposed Development exceeds the threshold in Column B of Paragraph 3(a) (i.e. 0.5 hectares), it is defined as Schedule 2 development. As such, a screening opinion should be sought for the Proposed Development to establish whether significant effects are likely in which case, it would constitute EIA development.
- 2.1.4 The Site is not located within a Site of Special Scientific Interest (SSSI), a National Park or the Broads, nor does it contain a property appearing on the World Heritage Site or a Scheduled Monument. The Site is also not located within a National Landscape or a European Site. On this basis, there are no Sensitive Areas as defined in Regulation 2(1) of the EIA Regulations within the Site.
- 2.1.5 Planning Practice Guidance (PPG) provides further advice on determining whether or not significant effects are likely. Paragraph 057 (Reference ID: 4-057-2070720) and 058 (Reference ID: 4-058-20150326) provide thresholds and criteria for the identification of Schedule 2 development requiring an EIA and indicative values for determining significant effects.
- 2.1.6 It advises that in general, the more environmentally sensitive the location, the lower the threshold will be at which significant effects are likely.
- 2.1.7 Table 2.1 sets out the PPG’s indicative criteria and threshold and key issues to consider in respect of Part 3 (a).

Table 2.1: Indicative Screening Thresholds

Indicative Criteria and Threshold	Key Issues to Consider
Thermal output of more than 50 MW. Small stations using novel forms of generation should be considered carefully.	Level of emissions to air, arrangements for the transport of fuel and any visual impact.

- 2.1.8 The BESS element of the Proposed Development would not create electricity, steam or hot water. The solar element would generate electricity and minimal thermal output; it is not classified as a thermal generating station. For the Proposed Development, there would be slight temporary increases in emissions to air caused by vehicle movements during the construction and decommissioning phases, as well as very occasional maintenance visits (typically 1 or 2 small vehicles per month). Arrangements for the transport of fuel are not applicable. Visual impacts are assessed later in the document.

3 Site Context

3.1 Site Description

- 3.1.1 The Site comprises predominantly agricultural fields and parcels of woodland. There are also a small number of agricultural buildings within the Site. An electricity pylon is located within the southeast corner of the Site, with the associated National Grid 400kV overhead line transcending in a northeast-southwest direction.
- 3.1.2 Munches Farm, comprising an agricultural farm buildings and associated access, is situated within the Site. It will not be removed or altered as part of the Proposed Development and is an associated property.
- 3.1.3 Immediately north of the Site is the A507 with agricultural fields, woodland and a farm beyond. Mill End Plants and Café and the village of Rushden is situated approximately 1km to the northeast. Immediately east is a branch of the A507, Cumberlow Green and further agricultural fields. To the south of the Site are agricultural fields and woodland along with the River Beane and the Weston Tributary approximately 0.25km south. To the west of the Site are several residential properties, agricultural fields and woodland.
- 3.1.4 The Site is located wholly within the North Hertfordshire District Council, although it abuts the East Hertfordshire District Council boundary on its eastern edge.
- 3.1.5 The Site is situated southwest of the village of Cumberlow Green, approximately 3km northeast of Stevenage. Letchworth Garden City is located approximately 3.7km northwest.
- 3.1.6 The surrounding area of the Site is largely rural with a number of villages including:
- Shaw Green approximately 1.2km north;
 - Rushden approximately 1km northeast;
 - Southern Green approximately 1.6km northeast;
 - Cottered approximately 1.3km east;
 - Hare Street approximately 1.25km southeast;
 - Cromer approximately 1.2km south;
 - Luffenhall approximately 0.4km south;
 - Halls Green approximately 1.3km southwest;
 - Warren's Green approximately 2.15km southwest;
 - Weston approximately 1.4km west; and
 - Clothall approximately 1.25km northwest.

3.2 Planning Designations

- 3.2.1 The majority of the Site is situated within the Rural Area beyond the Green Belt as defined on North Hertfordshire District Council Local Plan 2011 – 2031 Policies Map. Part of the northwest of the Site is within the Green Belt.
- 3.2.2 There are no designations on the Site within the Minerals and Waste Local Plan Policies Map (October 2024).

3.3 Environmental Baseline Conditions

- 3.3.1 There are no known ecological designations associated with the Site. The nearest statutory designated site comprises Moor Hall Meadows Site of Special Scientific Interest (SSSI) approx. 3.7km southeast. Other designations in the surrounding area include Hill Local Nature Reserve (LNR) approx. 3.8km northwest, and Blagrove Common SSSI approx. 3.9km northeast.
- 3.3.2 The Site is not within a National Park or National Landscape Area. It is classified as being within the South Suffolk and North Essex Clayland National Character Area of the East Anglian Plain.
- 3.3.3 The Site contains a number of parcels of ancient and semi-natural woodland and ancient replanted woodland including Rydals Wood and Coldash Wood west. There are also a number of parcels of ancient woodland in the surrounding area of the Site, including Munches Wood and Baskets Wood ancient and semi-natural woodland directly north of the Site.
- 3.3.4 The Site is predominantly within Flood Zone 1, with areas of Flood Zone 2 located through the central section of the Site and which branch off east and west from the central swathe (associated with an unnamed watercourse). There are also areas of high to low surface water flood risk. The layout of the Proposed Development will not have any electrical infrastructure in areas of flood risk.
- 3.3.5 There are no designated heritage assets on the Site, however the 'Site of Cumberlow Manor House' Scheduled Monument is situated directly northeast of the Site, beyond the A507. Within 1km of the Site, there are two additional Scheduled Monuments: the Lammas Field Roman Villa approx. 610m to the northwest and the Enclosure and Earthworks southeast of Clothallbury House approx. 745m to the north.
- 3.3.6 Further to the above, there is one Grade II* and eight Grade II listed buildings within 1km of the Site. The Grade II* listed Cromer Windmill is located approx. 1km to the south of the Site.
- 3.3.7 There is potential for below-ground archaeological remains from the prehistoric, Roman, medieval and post-medieval periods to be present on the Site. However, post-medieval and modern ploughing activities may have disturbed any such remains.

3.3.8 Two Public Rights of Way (PRoW) (HD|CLOTHALL|019 and HD|CLOTHALL|020) cross the Site from east to south and north to south. There are various other PRoWs, and a national cycle network in the immediate surroundings of the Site.

3.3.9 According to the Provisional Agricultural Land Classification (ALC), the Site is predominantly within Grade 3 ALC. Part of the southeast and a very small part of the northwest is within Grade 2.

3.4 Cumulative Development

3.4.1 A search of the North Hertfordshire District Council and East Hertfordshire District Council planning maps search was undertaken on 14 January 2025. Due to the area of the Site, major applications of renewable energy development and 50+ dwellings have been accounted for along with other developments of relevance within 5km of the Site.

3.4.2 The Applicant is aware of the following existing, approved and pending developments that may result in cumulative impacts with the Proposed Development. The potential for cumulative effects, and where relevant, an assessment of their likely scale is presented within latter sections of this request.

- Ref. 3/24/2245/FUL - Installation and operation of a solar farm including co-located energy storage facilities, onsite substation, ancillary infrastructure and landscaping at Land to the West of the A507 between Cottered and Cromer, Hertfordshire, SG9 9PU. Awaiting decision (validated: 20 December 2024).

This proposed development is directly southeast of the Site.

- Ref. 3/24/0966/OUT - Outline planning application for development of up to 600 dwellings (C3), elderly accommodation (C3), Mixed Use Local Centre (including flexible use E, F and Sui Generis), First School, informal and formal open space, associated works and infrastructure including a new access from the A507 and pedestrian bridge over the A10, with all matters reserved except access at Land North of A507, West of A10 Buntingford. Awaiting decision (validated: 28 May 2024).

This proposed development is located approximately 4.6km east of the Site.

- Ref. 3/24/1255/OUT - Outline planning application for development of employment land (flexible use B2, B8, E(c) and E(g)), informal open space, associated works and infrastructure including a new access from A507, with all matters reserved except for access at Land South of A507, West of A10 Buntingford. Awaiting decision (validated: 11 July 2024).

This proposed development is located approximately 4.8km east of the Site.

- Ref. 3/19/0118/OUT - Hybrid planning application: (i) Planning permission for construction of the spine road, site accesses, drainage infrastructure and ancillary works and (ii) Outline planning for the erection of up to 618 homes, primary and pre-school, up to 1 no. 80 bed care home and up to 50 assisted living homes (C2 use), neighbourhood hub comprising shops (up to 658 sqm of A1-A5 uses), community

facilities (up to 400 sqm of D1 use), Travelling Showpeople site, public open space, landscaping, drainage infrastructure, all associated and ancillary development at Land East of Stevenage (EOS1), Gresley Way, Stevenage. Granted (18 December 2020).

This proposed development is located approximately 4.20km south of the Site.

- Ref. 24/00920/SCOP – Request for a Scoping Opinion for up to 3,000 homes; up to 19 hectares of employment land; strategic 'green infrastructure'; a mixed use local centre; education provision; and associated infrastructure at Land East of North Road and North of the Railway Line, Bygrave Road, Baldock, Hertfordshire. No decision available (registered: 25 April 2024).

This proposed development is located approximately 4km northwest of the Site.

- Ref. 23/00806/SCOP - Scoping Opinion: Residential development of up to 650 homes, access road, up to 500sqm retail, food and beverage and medical and social floorspace, up to 4ha of non Green Belt land to make provision for a 2FE primary and possible 4FE secondary school, parking infrastructure and associated works at Ga2 Land off Great Ashby Way, Great Ashby, Stevenage, Hertfordshire. Further consultation comments required (validated: 06 April 2023).

This proposed development is located approximately 2.6km southwest of the Site.

- Ref. 24/02889/FP - Residential development of 281 dwellings and associated roads, parking, realignment of Back Lane, drainage, landscaping, open space, servicing facilities and associated works at Land at Roundwood, Back Lane, Graveley, Hertfordshire. No decision available (validated 19 December 2024).

The proposed development is located approximately 3.6km southwest of the Site.

- Ref. 23/02935/OP - Outline planning application with all matters reserved other than means of access, for the erection of up to 900 dwellings (including affordable housing and self/custom build units), provision of a primary school, provision of a neighbourhood centre including community building, and provision of open space areas across the site, together with associated drainage, land works and utilities works at Land to the East of High Street and North Road, Graveley, Hertfordshire. No decision available (validated: 21 December 2023).

The proposed development is located approximately 4.9km southwest the Site.

4 Proposed Development

- 4.1.1 The Proposed Development is for the construction of a BESS facility and co-located solar farm, associated infrastructure, access, landscaping and biodiversity enhancement.
- 4.1.2 Battery storage is a technology that enables power system operators and utilities to store energy for later use. BESS is a system of devices that charge (and store) electricity from the grid at time of excess and then discharges that stored energy at a later time to provide electricity or other grid services when needed.
- 4.1.3 By importing excess electricity from the grid and storing it, batteries can capture energy (particularly from renewables like the co-located solar) that would otherwise be lost/unutilised, releasing this during peak demand or when a renewable energy source is not generating.
- 4.1.4 As the UK electricity network is interconnected, problems in one geographic location can have far reaching implications on the electricity network. Subsequently, BESS offers additional capacity to deal with system stress and variations in grid frequency at both a local and national level.
- 4.1.5 The Site will be subject to numerous environmental surveys and assessments which will be used to refine and microsite the design. The design will seek to evolve to avoid potentially significant environmental effects and incorporate feedback from both the pre-application submission and the community consultation process; therefore, the exact quantum and layout is to be confirmed at a later stage. However, it is anticipated that the Proposed Development will broadly comprise the following:
- A battery storage and substation compound comprising:
 - Battery storage infrastructure which includes battery units/cabinets at a height of approx. 3.2m (including foundations) and associated power conversion systems (PCS) containers (approx. 3.1m in height).
 - Customer Substations (approx. 4m in height) to collect electricity from the distributed inverter/transformers on the site and export it at a set current and voltage suitable for the associated substation to transform and transfer again to the local transmission network;
 - A EHV Substation including a switchyard, Transformers (approx. 12m in height), Busbar Arrangement (approx. 11.2m in height), Outing/Incoming Metering, Relay & Control Rooms (approx. 5m in height), Protection Equipment rooms (approx. 5m in height), and HV Switchrooms (approx. 5m in height).
 - A solar array comprising photovoltaic (PV) panels arranged in arrays or rows, fixed on a mounted frames and securely fixed to the ground with posts. The panels are dark in hue and are designed to maximise the absorbency of the sun's rays and minimise solar glare by incorporating an anti-glare coating. Panels are typically tilted 10 to 25 degrees from the horizontal to face south towards the sun. There is usually a distance

of 2-6 metres between strings of panels in order to avoid inter-panel shading, but this distance is influenced by slope and aspect.

- Associated infrastructure and equipment will include the following:
 - A welfare container (approx. 2.7m in height);
 - Two spares containers (approx. 2.7m in height);
 - An Operations Office (approx. 2.7m in height), which will not be permanently manned;
 - Security fencing will be provided around the BESS infrastructure, and perimeter fencing (deer fencing) will be provided around the wider Site;
 - A number of motion sensor-based CCTV cameras, up to 4m in height, will also be provided across the Site to mitigate risk of theft and criminal damage. These will face inwards;
 - Access tracks – likely to be 4.5 m wide (kept to a minimum across the site); and
 - Underground cables linking the solar fields to the inverters / transformers and back to the substation compound on Site.

Access

- 4.1.6 Access is likely to be primarily from the A507 by utilising existing access points wherever practicable. Survey work and assessment is ongoing to determine this element. Appropriate Swept Path Analysis will be undertaken to determine whether any access would need further widening as part of the Proposed Development.
- 4.1.7 Traffic effects would largely be limited to the 12 - 18 month construction period when materials and equipment are delivered and installed at the Site.
- 4.1.8 Once operational, given the Proposed Development will be remotely operated and unmanned, traffic volumes would typically be limited to circa 1 van or 4x4 every two weeks for maintenance purposes. It is assumed that traffic measures during construction could be adequately controlled through a Construction Traffic Management Plan (CTMP). It is anticipated that an outline version of the CTMP would be submitted as part of any planning application, with final details to be provided as part of a planning condition, once a construction contractor is appointed.

Construction

- 4.1.9 Construction of the Proposed Development would likely be completed within 12-18 months and so any effects arising from this are considered short term and reversible upon completion.

Operation and Decommissioning

- 4.1.10 The Proposed Development would not be permanent but would be reversible with a temporary operational period of 40 years. Any planning permission would be for a non-permanent use with a condition requiring the land to be returned to its pre-development state at the end of this duration.
- 4.1.11 At the end of the operational period, the Proposed Development would be decommissioned in accordance with best practice at that time and decommissioning effects are considered similar in nature to those arising during construction.

Biodiversity Enhancements

- 4.1.12 Significant biodiversity enhancement opportunities will be provided on-site through additional planting such as hedgerow and species diverse grassland. There may also be the potential to provide wildlife corridors to further enhance the biodiversity of the Site. Lightrock will work with the RSPB through their corporate partnership to ensure that biodiversity is prioritised throughout the design development.

5 Environmental Impact Assessment Screening Methodology

5.1 Introduction

5.1.1 As stated in Section 2, screening of the Proposed Development requires an assessment as to whether it is “*likely to have significant effects on the environment by virtue of factors such as its nature, size or location*” (Schedule 2). The potential for significant effects depends on the sensitivity of the receiving environment to the type of changes proposed, combined with the magnitude and scale of changes proposed.

5.1.2 Information on the methodology for EIA screening is presented in this section. The characteristics of the Site and Proposed Development are described in Section 3 and 4 above, and other potentially relevant developments in Section 3.4. Section 6 describes the existing environment by EIA topic, followed in each EIA topic section by an appraisal of the potential for impacts, and whether or not there is potential for significant effects.

5.2 Establishing Baseline

5.2.1 In order to evaluate the likely environmental effects, information relating to the existing environmental conditions (known as the ‘baseline’ conditions) has been collected through desktop research and site visits. The baseline is used to help describe the Site location, to identify potentially sensitive receptors on and near the Site, and to help characterise the potential impacts.

5.3 Identifying the Potential for Significant Effects

5.3.1 The changes to the Site and its surrounding environment which may take place during the construction, operation and decommissioning of the Proposed Development have been identified and considered for potential direct or indirect changes to environmental features within or outside of the Site. Changes to the environment are known as ‘impacts’, and anything which benefits or creates detriment to an environmental feature is known as an ‘effect’ – which can be either ‘beneficial’ or ‘adverse’ effects. Any impacts are appraised using professional judgement by experienced EIA practitioners to determine the potential for significant effects on receptors. The following potential effects are considered:

- Direct and indirect effects ;
- Primary and secondary effects ;
- Short, medium and long-term effects; and
- Permanent and temporary effects.

5.3.2 Establishing the baseline, including predicted future conditions without the Proposed Development, is the key basis for predicting the potential for impacts and effects at this screening stage, combined with professional judgement in conducting EIA and

environmental appraisals of a range of development types, and reviews of other similar developments.

- 5.3.3 In arriving at conclusions about the potential for significant effects, in line with EIA assessment techniques, the sensitivity of the receptors and the predicted magnitude of change from the baseline conditions (either beneficial or adverse) have been considered (and appropriately referenced). This is done because the overall significance of potential likely environmental effects (when assessed in EIA) is determined by the interaction of the above two factors. However, EIA Screening is not a full, in-depth assessment (which would be done if EIA is required) and relies mostly on understanding of the baseline and professional judgement, including previous experience of similar developments.

5.4 Mitigation

- 5.4.1 Mitigation measures will be embedded into the overall design strategy and form an integral part of the Proposed Development. An example of this would be screening to reduce the magnitude of visual effects, and habitat creation where consideration will be given to tree and woodland planting and wildflower meadow on sections of the Site following completion of the ecological and landscape appraisals (which will be submitted with any forthcoming application) which enabled meaningful mitigation and enhancement to be integrated into the Proposed Development. By being flexible with the design, the project will continue to respond to the findings of consultation and environmental appraisal work through an iterative design process. Mitigation has been discussed where applicable in this report.

6 Environmental Screening Assessment - Potential Environmental Effects

6.1 Site Access and Transport

Transport Baseline

- 6.1.1 The direction of construction vehicles is likely to be from the A1 to the northwest as this is considered to be the most direct and appropriate route from the strategic highway network to the Site, but the exact routing of construction vehicles will be identified through consultation with the Highway Authority.
- 6.1.2 The Site will then be accessed via a new access track from the A507 by utilising an existing access point wherever practicable. The access track will be designed to accommodate HGV's that will access the Site for the delivery of equipment during the construction phase. New access tracks of approximately 4 m width and suitable for construction and operational vehicles would then be installed to enable access further within the Site and reduce traffic on the roads around the Site during the construction period.
- 6.1.3 Survey work and assessment is ongoing to determine this element and will incorporate appropriate swept path analysis and assessment of visibility splays will be undertaken to determine whether any widening of existing access points would be required as part of the Proposed Development.

Summary of Potential Significant Effects

- 6.1.4 An area for a temporary construction storage compound will be provided within the Site, allowing parking for onsite staff / visitor parking, and turning space for delivery vehicles which would not impact the local highway.
- 6.1.5 Traffic effects of the Proposed Development will be limited to the construction phase, which is anticipated to last 12–18 months with the latter months comprising testing and commissioning.
- 6.1.6 Once operational, given the Proposed Development will be remotely operated and unmanned, traffic movements would be limited and typically be 1 van / 4x4 every two weeks for routine maintenance purposes.
- 6.1.7 A Transport Statement (TS) will be prepared to accompany the forthcoming planning application submission to assess the proposed trip generation associated with both the construction and operational phases of the Proposed Development and will include consideration of any potential for cumulative impacts.
- 6.1.8 It is assumed that traffic measures during construction will be adequately controlled through a Construction Traffic Management Plan (CTMP). It is anticipated that an outline version of the CTMP would be submitted as part of any planning application, with final

details to be provided as part of a planning condition, once a construction contractor is appointed. It is therefore unlikely that transport impacts during construction would result in a significant impact.

- 6.1.9 On this basis, it is not considered that significant effects are likely to arise with regards to matters of site access and transport that would warrant an assessment within an EIA.

6.2 Landscape and Visual

- 6.2.1 The Site is not subject to any statutory landscape designations or identified as an area of strategic landscape on the Council's Local Plan Policies Map. The Chiltern Hills National Landscape is located approximately 20km west of the Site. There are no National Parks within 50km of the Site.

- 6.2.2 The Proposed Development is entirely located within the National Character Area (NCA) Profile: 86 South Suffolk and North Essex Clayland (NE515). The NCA Profile: 40 (Natural England, 2015) states that:

'It is an ancient landscape of wooded arable countryside with a distinct sense of enclosure. The overall character is of a gently undulating, chalky boulder clay plateau, the undulations being caused by the numerous small-scale river valleys that dissect the plateau.'

Landscape Baseline

- 6.2.3 The Proposed Development is located adjacent to the A507 on a partly wooded arable plateau to the west of Cumberlow Green. The Site is bisected by an unnamed watercourse flowing southwards. There is a PRoW adjacent to the watercourse which flows towards the Weston Tributary and River Beane, both situated approximately 200m to the south of the Site at their closest point.
- 6.2.4 The majority of the Site and its surrounding landscape is broadly undulating. There is also notable incised landform associated with the small-scale watercourses within and around the Site. The highest ground within the Site is 140m AOD (Above Ordnance Datum) to the westernmost Site boundary. The southern and eastern parts of the Site are lower lying compared to the northern and western parts and this is due to the River Beane valley and its tributaries affecting the wider plateau landform. The lowest ground within the Site is along the valley floor to the southernmost Site boundary where the elevation is 100m AOD.
- 6.2.5 To the west of the unnamed watercourse there are notable blocks of deciduous woodland at Rydals Wood (approx. 6.5 ha) and Coldash Wood (approx. 8.3ha) The fields here are small to medium size and irregular and generally bound by hedgerows with trees. To the east of the watercourse, the fields within the Site are also irregular albeit of a larger scale and less wooded compared to those on the opposite side of the minor valley to the west.
- 6.2.6 The western Site boundary is defined by a byway open to all traffic (BOAT) that is bordered by canopy trees and hedgerows for the majority of its length where it is contiguous with the Site boundary.

- 6.2.7 The northern Site boundary is defined by the A507. Kingswood Bury House and Toggs residential properties are situated on this road and are located adjacent to the northwestern Site boundary.
- 6.2.8 The eastern Site boundary is defined by a country lane that connects Cumberlow Green with Cromer and crosses the Beane valley. The southern Site boundary is defined by field boundaries with hedgerows and trees.
- 6.2.9 High voltage overhead power lines (OHL) and associated pylon towers are prominent visual detractors passing broadly east/west through the southeastern Site extents. Approximately 625m to the south of the Site, beyond the OHL, lies Luffenhall a dispersed linear development located at the confluence of the Weston Tributary and the River Beane.
- 6.2.10 There is an agricultural building within the Site to the immediate south-west of Rydals Wood. It is accessed from the A507 via a made track. Other than this building, the OHL and the pylon, there is no built form within the Site.
- 6.2.11 The overall character of the Site and its immediate and local landscape context is reasonably consistent with the NCA summary above: an ancient landscape of wooded arable countryside, with a distinct sense of enclosure; a gently undulating, chalky boulder clay plateau, with numerous small-scale river valleys.
- 6.2.12 The overall character of the wider landscape is likewise consistent albeit with the introduction of chalkland influences to the north-west of the Site due to the presence of the East Anglian Chalk NCA, some 1.2km from the Site at its closest point.

Visual Baseline

- 6.2.13 Visibility of the Site from the surrounding landscape is limited due to intervening plateau landform to the north and west and the screening effects of vegetation in all directions. Vegetation within the Site is described above. The broad pattern of vegetation outside the Site includes woodland blocks on the plateau to the north and west of the Site and intermittent treed hedgerows within the river valleys to the south and east of the Site.
- 6.2.14 There is minimal intervisibility of the Site from receptors to the north and west other than those located within the immediate surroundings and set out above (A507, Kingswood Bury House and Toggs and BOAT (12 Clothall). Kingswood Bury Farm, approximately 440m to the north of the Site, may also have southerly views across the Beane valley that take in the Site.
- 6.2.15 Visibility of the Site from receptors to the south and east is more widespread due to the potential for views across the Beane valley. Such views occur from a swathe of north and west-facing land that is bound by the B1037 to the south, Cromer to the west and Cottered to the east. This includes the local landmark Cromer Windmill. There are also approximately 10 no. residential receptors at Cumberlow Green to the immediate east of the Site.

- 6.2.16 There is a second OHL to the south of the Beane valley. Northerly and westerly views towards the Site will be influenced by the detracting effects of numerous pylon towers and transmission lines.

Cumulative Baseline

- 6.2.17 It is recognised that the land immediately to the south-east of the Site is subject to an application for a solar farm (Ref. 3/24/2245/FUL). It is noted that this Site straddles the Beane Valley and extends southwards towards Cromer and Cottered.

Landscape Mitigation Design

- 6.2.18 The Site layout is being developed in direct response to an assessment of the Site's landscape sensitivity and character and its visibility from key receptors. Site work including photography has been undertaken including a review of likely cumulative effects.
- 6.2.19 In response to the assessment of potential visibility and wider landscape character, the design objectives are as follows:
- Concentrate the battery storage in the south-eastern extents of the Site where there is an established pattern of energy infrastructure and greatest potential for mitigation planting to be effective in screening views across the Beane Valley;
 - Preclude development from the fields on the north western part of the Site either side of the access from the A507 along the northern boundary and from the northern section of the most easterly field (closest to Cumberlow Green). This is due to early feedback obtained by the Applicant in consultation to nearby neighbours;
 - Utilise the wooded backdrop and well vegetated skyline to backcloth development and avoid skylining for visual receptors to the south of the Site including those along the B1037 between Cromer and Cottered;
 - Provide layered screening to cross-valley views of the BESS utilising existing and strengthened structural vegetation on the southern slopes of the Beane Valley within the Site;
 - Where appropriate, introduce screening and/or set backs on the western edge of the Site and adjacent to the BOAT to ensure landscape and visual effects are contained and do not extend into the neighbouring plateau landscape;
 - Where possible retain all existing hedgerows, trees and vegetation within the Site to maintain the existing structure to the landscape and provide natural screening of the proposed infrastructure;
 - Protect and enhance the area's woodlands through the planting of new woodlands on former woodland sites or adjacent to existing sites using local native species, where this results in enhanced ecological connectivity and benefit to the traditional wooded appearance and character;

- Maintain the existing PRow within the Site and provide pleasant recreational routes across the Site through the creation of landscape corridors. A landscape corridor could include appropriate vegetation such as riparian planting, native hedgerows, woodland blocks and woodland belts to provide an attractive and interesting route for users;
- Consider the potential for the creation of new permissive paths within the Site to link up existing PRow's which cross the Site and located on the northern side of the A507;
- Deliver additional opportunities to reinforce the character of the local landscape through the planting of native hedgerows, hedgerow trees and woodland including reinforcement and gapping up with native trees and hedgerows as per NCA guidelines; and
- Provide positive opportunities for notable habitat and biodiversity net gains.

Summary of Potential Significant Effects

- 6.2.20 The Site and receiving medium scale landscape with existing energy infrastructure corridor in the Beane Valley, have the ability to absorb the proposals without giving rise to significant effects to the fabric of the Site itself or the character of the landscape either locally or within the wider area.
- 6.2.21 Visibility of the Site is predominantly restricted to its immediate surroundings and the north-facing Beane Valley flanks. Long range views of the Site cannot be obtained due to intervening plateau landform. Whilst the proposals are considered to have some visual presence to recreational and transport users, the potential for significant visual effects on residential receptors or entire routes is considered unlikely.
- 6.2.22 When considered in combination with the adjacent proposed solar farm, it is predicted that any likely significant cumulative landscape and visual effects would be highly localised and contained within the immediate landscape context of the Beane Valley.

6.3 Ecology

- 6.3.1 UKHabitat surveys and a Preliminary Ecological Assessment have been undertaken and have been used to inform the impacts to ecological features.

Ecology Baseline

- 6.3.2 There are no designated sites including SSSI's and LNR's within 2 km of the Site. The primary habitat on-Site consists of arable land in the form of cropland and ley fields, surrounded by neutral and modified grassland verges. There is also a single neutral grassland field to the south. There are two lowland mixed deciduous woodlands on-Site in the form of Coldash and Rydal's Wood, which are connected through hedgerows to other pockets of woodland

across the Site. Many hedgerows are associated with banks or ditches and contain trees. Other features include ponds, ditches and lines of trees. Lowland mixed deciduous woodland and hedgerows are a Habitat of Principal Importance.

- 6.3.3 Coldash and Rydal's Wood are both Local Wildlife Sites (LWS) and ancient woodlands within the Site boundary. Although there are no direct impacts expected to the woodlands, there could be indirect impacts resulting from the construction phase, such as lighting and noise pollution. As such, a 15-30m buffer will be proposed around the Ancient Woodlands to prevent indirect effects and dependant on ongoing surveys. Three further LWS's in the proximity of the Site may also be in the zone of influence: Hickman's Hill Green Lane, adjacent to the Site on the south westerly edge; Basket's Wood 10 m north; and Munches Wood 30 m north.
- 6.3.4 There are six ponds within 250m of the Site. There are badger sett entrances located on-site. They will be treated as active, and a 30m buffer will be in place to omit the risk of disturbance.
- 6.3.5 The Site habitats are suitable for great crested newts (GCN), badger, breeding and wintering birds, foraging, commuting and roosting bats. Surveys are underway for wintering and breeding birds, bats (activity and GLTA) and GCN to inform the level and significance of the impact of works.
- 6.3.6 There may be roosting, foraging and commuting bats on the Site owing to the ancient woodland. Development works will be limited to the arable fields, however roosting bats could be subject to indirect impacts. These will be considered in the assessment work being undertaken as part of the ecological assessments.

Ecology Mitigation Design

- 6.3.7 The Site layout is being developed in direct response to ongoing ecological surveys. The following embedded mitigation will be incorporated subject to survey results:
- Skylark plots and the enhancement of bird nesting habitat;
 - 15-30 m buffers around ancient woodlands for protection;
 - 30 m buffers around any potential badger sett entrances;
 - Any required protected species licences will be attained and followed directly;
 - Where possible retain all existing hedgerows, trees and vegetation within the Site to maintain the ecological corridors;
 - Protect and enhance potential bat foraging and commuting corridors through the planting of new woodlands on former woodland sites and creating better networks between woodland parcels; and
 - Achieve BNG through additional planting such as hedgerow and species diverse grassland on-site.

Ecology Summary of Potential Significant Effects

- 6.3.8 Subject to the findings and mitigation recommendations of the proposed habitat and species surveys, no significant effects on on-site ecology from the Proposed Development are anticipated with potential for some beneficial effects through habitat enhancement and creation in addition to resting the land from intensive agriculture.

6.4 Historic Environment

Designated Heritage Assets Baseline

- 6.4.1 Within the 1km study area, there is one Grade II* listed building and eight Grade II listed buildings. The majority of these have been scoped out from requiring further assessment due to being screened from the Site by vegetation, topography, or the surrounding urban context. As such, their significance is unlikely to be affected by the Proposed Development.
- 6.4.2 The Grade II* listed Cromer Windmill (NHLE 1101453), located approximately 1km south of the Site, is considered sensitive to the Proposed Development due to potential impacts on its setting (Plate 1-4).
- 6.4.3 The Site of Cumberlow Manor House Scheduled Monument (NHLE 1003551) lies adjacent to the north eastern boundary of the Site, beyond the A507. Its proximity and heritage significance make it a particularly sensitive area for the Proposed Development (Appendix 2).
- 6.4.4 A Historic Environment Desk-Based Assessment has concluded that the Proposed Development would result in less than substantial harm, at the lower end of the scale, to the Site of Cumberlow Manor House Scheduled Monument and to Cromer Windmill. This Assessment considers factors such as the existing setting, modern intrusions, and the degree of visual and functional association between the assets and the Site. While the Proposed Development may introduce changes to the surrounding landscape, these are not expected to significantly alter the key heritage values or the ability to appreciate the significance of the assets. Should any remains associated with Cumberlow Manor House extend into the Site, they could hold local or regional significance, depending on their nature and extent. Although, the construction of the A507 has likely truncated any remains of the Manor House within its footprint, which may diminish the significance of any remains extending into the Site. A geophysical survey will be conducted to determine the nature and extent of any archaeological features within the Site.
- 6.4.5 The Proposed Development will incorporate strategies to mitigate potential impacts on designated heritage assets. This will include careful site design, the use of landscape buffering to minimise visual intrusion, and engagement with Historic England and local conservation officers to ensure that heritage concerns are appropriately addressed.

Potential Sub-Surface Archaeological Remains

- 6.4.6 There are five HER records located within the Site, comprising three findspots; a late Bronze Age hoard (MHT581), a 1st century brooch (MHT28077) and a Roman coin (MHT28083), as well as the location of a Medieval moated site (MHT4377) and the line of the Roman Road from north of Baldock to Braughing (MHT4190).
- 6.4.7 The wider 1km search area contains 48 additional HER ‘monument’ records and 372 Portable Antiquities Scheme (PAS) records, including the two findspots (brooch and coin) located within the Site.
- 6.4.8 The geophysical survey conducted to date has identified anomalies, primarily of likely agricultural and geological origin, within the north-western extent of the Site. Anomalies of uncertain origin have been recorded along the line of the Roman Road, and a possible square anomaly, fronting onto Clothall Road, has been identified in the north-westernmost parcel.
- 6.4.9 It is considered that there is potential for archaeological deposits associated with the prehistoric and Roman periods within the Site. These remains are likely to comprise residual findspots, though settlement or burial activity cannot be ruled out. Notably, the potential for Roman activity is higher along the conjectured line of the Baldock to Braughing Roman Road, as such roads often attracted roadside settlement, small farmsteads, or associated infrastructure. The significance of any such remains would range from local to regional, depending on their extent and nature.
- 6.4.10 Archaeological deposits from the medieval period may also be present, likely related to manorial or agricultural activity given the proximity of Cumberlow Manor House, and the moated site in the northwest of the Site. These remains could provide valuable insights into the medieval landscape. However, unless directly associated with manorial or settlement features, their significance is anticipated to be low.
- 6.4.11 The agricultural use of the Site persisted into the post-medieval and modern periods. Outside of quarrying footprints, any remains relating to post-medieval or modern agricultural activity would be considered of negligible significance.
- 6.4.12 Also of note are the hedgerows lining the parish boundary adjacent to the western edge of the Site. According to the HER, the hedges and boundary banks along this boundary are evidently ancient. Under the Hedgerow Regulations Act 1997, hedgerows along parish boundaries are classified as ‘important.’ The preservation of these boundary features provides valuable insight into the historical division and use of the landscape. Therefore, they will be retained as far as possible within the Proposed Development layout.
- 6.4.13 A programme of archaeological mitigation measures may be required to mitigate potential impacts on sub-surface archaeological remains. Such mitigation measures might include the removal of archaeologically sensitive areas from intrusive development, and/or the use of other non-ground penetrative techniques for the solar arrays, as well as targeted archaeological investigation.

Historic Environment Mitigation Design

- 6.4.14 The Site layout is being developed in direct response to an assessment of the Site's heritage sensitivity and its visibility from key receptors. Site work including a walkover and an on-going geophysical survey have been undertaken to review effects.
- 6.4.15 The following embedded mitigation will be incorporated subject to results:
- Landscape buffering along the south-eastern extents of the Site to minimise views out from Cromer Windmill;
 - A programme of archaeological mitigation, likely targeted archaeological investigation prior to commencement of the Proposed Development;
 - Offsets, panel free buffer zones and removal of panels from sensitive areas, and/or the use of other non-penetrative techniques (i.e. concrete anchors); and
 - Correspondence with Historic England and local conservation officers to ensure that heritage concerns are appropriately addressed.

Summary of Potential Significant Effects

- 6.4.16 On this basis, the Proposed Development is not expected to have significant effects on the historic environment and potential sub-surface archaeological remains in EIA terms. This conclusion is subject to appropriate control measures within a Construction Environmental Management Plan (CEMP), including careful site design, landscape buffering to minimise visual intrusion, and engagement with Historic England and local conservation officers to address heritage concerns. The CEMP could be secured through a suitably worded planning condition.

6.5 Flood Risk

- 6.5.1 The Site is predominantly within Flood Zone 1, the lowest category of flood risk. Areas of Flood Zone 2 are located through the central section of the Site and which branch off east and west from the central swathe (associated with unnamed watercourse). Whilst the majority of the Site is not within areas at risk of surface water flooding, there are small areas of high to low surface water flood risk.
- 6.5.2 The proposed solar and BESS infrastructure will avoid areas at risk of flooding. Additionally, flood risk, and infiltration testing, and overland flow mapping will be analysed and incorporated into a Flood Risk Assessment and Surface Drainage Strategy which will be submitted with any forthcoming planning application.
- 6.5.3 A CEMP can be secured through a planning condition, to ensure that no significant effects arise from the Proposed Development on the water environment during the construction phase.

- 6.5.4 On this basis, it is not considered that significant effects are likely to arise with regards to matters of flood risk to warrant an assessment within an EIA.

6.6 Agricultural Land

- 6.6.1 According to the Provisional Agricultural Land Classification (ALC), the Site is predominantly within Grade 3 ALC. Part of the southeast and a minor part of the northwest is within Grade 2. A detailed Agricultural Land Classification Report of the Site will accompany any future planning application.
- 6.6.2 Given the availability of agricultural land in the vicinity of the Site, the scale of the Site relative to the land available and the temporary and reversible nature of the BESS and solar infrastructure, and the ongoing agricultural use that will be maintained on Site through sheep grazing there is not considered to be any significant effects in EIA terms.

6.7 Air Quality

- 6.7.1 The Proposed Development is not a pollutant generator. Any pollutants or dust associated with the Proposed Development would be associated with vehicle movements during the construction, operation (maintenance only) and decommissioning phases.
- 6.7.2 There would be a slight increase in temporary localised emissions during the construction and decommissioning periods, associated with the vehicles used to transport components to/from the Site which would create normal vehicle emissions. There would also be occasional maintenance visits during the operational phase, but no other emissions are anticipated to occur. Vehicle emissions are not expected to significantly exceed expected levels for the area in question, whilst construction equipment would be in line with industry standards.
- 6.7.3 The transport to/from the Proposed Development would create minimal emissions in a semi-rural environment and would not contribute substantially to local air pollution. There are no Air Quality Management Areas (AQMA) that would be affected by the Proposed Development.
- 6.7.4 Given the nature of the proposed construction and decommissioning activities, pollutant and dust levels are likely to be low and limited in duration.
- 6.7.5 Once in operation, vehicle movements will be limited to routine maintenance and therefore pollutant and dust levels are likely to be extremely low.
- 6.7.6** General construction good practice would be adopted, details of which would be provided in a CEMP, approved through condition, prior to construction starting. No significant effects are anticipated as a result of the Proposed Development.

6.8 Noise and Vibration

Noise and Vibration Baseline

6.8.1 The nearest residential noise sensitive receptors (NSR's) have been identified as:

- Dwellings on A507 directly east of the Site;
- Dwellings on A706 directly west of the Site;
- Dwellings within Luffenhall approximately 0.4km south; and
- Dwellings within Rushden approximately 1km northeast.

6.8.2 The nearest non-residential NSR's have been identified as:

- Users of the two Public Rights of Way (PRoW) (HD|CLOTHALL|019 and HD|CLOTHALL|020) cross the Site from east to south and north to south; and
- Mill End Plants and Café approximately 0.6km northeast.

6.8.3 There are a number of farms in the surrounding area along with Cumberlow Compost Services Limited which likely generate sound background noise. Key noise sources will be analysed in a baseline noise survey. Consultation has been undertaken with the Environmental Health Officer at North Herts District Council on the scope of the baseline noise survey.

Summary of Potential for Significant Effects

6.8.4 During construction, the potential for adverse effects of noise and vibration are expected to be temporary and limited to daytime working hours. Effects would also be limited to specific locations within the Site. Potential noise and vibration effects will be controlled by measures set out in a CEMP secured via an appropriately worded planning condition. On this basis, it is not expected that any significant effects at the nearest NSRs would arise during the construction phase.

6.8.5 Solar and BESS sites typically generate low sound levels. The design will adhere to the acoustic constraints in the area. An appropriate plant selection will also be made based on any acoustic constraints. As such, it is not considered the significant effects on noise and vibration are likely during the operation of the Proposed Development.

6.8.6 On this basis, it is considered that no significant noise and vibration effects are anticipated as a result of the Proposed Development in EIA terms, subject to suitable control measures to be included in a CEMP (enforced via condition), consideration of site layout, and appropriate acoustic specifications incorporated into the design.

6.9 Summary

- 6.9.1** It is considered that the likely effects of the Proposed Development will not be significant when considered against the information provided above and against the selection criteria outlined in Schedule 3 of the EIA Regulations. The latter is demonstrated in Section 6 of this report.

7 Consideration of Schedule 3 of the EIA Regulations

- 7.1.1 Schedule 3 of the EIA Regulations sets out selection criteria which relate to specific matters including: the characteristics of the Proposed Development; the location of the proposed development; and the characteristics of the potential impact. These factors should be taken into account as part of the screening process and are addressed below.

7.2 Characteristics of Development

Size and Design of Development

- 7.2.1 The Proposed Development is for the construction of a BESS facility and co-located solar farm, including associated infrastructure, access, landscaping and biodiversity enhancement.
- 7.2.2 Whilst the Site area is approximately 206ha, this incorporates significant biodiversity enhancement opportunities that will be provided on-site through additional planting such as hedgerow and species diverse grassland. There may also be the potential to provide wildlife corridors to further enhance the biodiversity of the Site.

Cumulation with Other Development

- 7.2.3 The Applicant is aware of a number of existing, approved and pending developments that may result in cumulative impacts as set out in Section 3.4. The effect of these cumulative developments will be considered in the relevant technical information prepared to support the planning application. Through the adoption of appropriate mitigation measures, the Proposed Development will seek to ensure that there are no significant environmental effects in cumulation with other developments.

The Use of Natural Resources

- 7.2.4 The construction and operational phases of the Proposed Development will use resources in terms of land, water and energy as expected for a BESS and solar scheme. These effects will be managed in accordance with practice measures during construction through a CEMP and are not anticipated to generate significant adverse effects. The CEMP could be secured through a suitably worded planning condition. Once decommissioned, the BESS and solar infrastructure would be removed, and the land will be returned to its previous agricultural use. Other elements of the Proposed Development such as the biodiversity enhancements will remain in place.
- 7.2.5 On this basis, it is not considered that the utilisation of resources during either the construction or operation of the Proposed Development will be significant.

The Production of Waste

- 7.2.6 The Proposed Development will not produce any waste during operation and any waste during construction will be minimal and can be managed through suitable management plans.
- 7.2.7 During decommissioning, the infrastructure would be dismantled and removed, and it is expected that this would be refurbished or recycled according to best practice guidance at the time and to recover valuable components. No significant effects are anticipated. Construction waste (e.g. surplus or unused construction materials; green waste (vegetation/soil)) will be reused and recycled, wherever possible. Any construction waste would be managed in accordance with the CEMP (enforced via condition) and all applicable legislation and disposed of in line with best practice.
- 7.2.8 Any waste created, for example through the maintenance of the facility, will be managed in accordance with best practice guidance.
- 7.2.9 Operational and decommissioning waste will be disposed of in line with the County Council's requirements and managed in accordance with all applicable legislation. Significant quantities of construction or operational waste are not anticipated as a result of the Proposed Development.

Pollution and Nuisances

- 7.2.10 The construction of the Proposed Development is not expected to give rise to any significant noise, nuisance, or pollution effects. To ensure that all construction related risks are appropriately mitigated against, a CEMP will be prepared and complied with during this phase, as set out in Section 6.8 of this screening request.
- 7.2.11 There will be no significant pollution or nuisance associated with the operation phase of the Proposed Development.
- 7.2.12 Any potential noise, battery failure or fire issues would be dealt with via suitable mitigation measures and the anticipated effects would not be significant.

Risk of Accidents and/or Disasters

- 7.2.13 The Proposed Development does not produce any substances that would pose a risk of accidents. The Site will also be monitored remotely via CCTV.
- 7.2.14 A Outline Battery Safety Management Plan will be prepared to accompany any forthcoming planning application. The Plan will provide details of inbuilt mitigation measures such as testing of equipment and suppression systems to ensure that any potential risk of fire will be controlled. The Plan will also demonstrate compliance with relevant guidance and/or standards applicable at the time of submission.

- 7.2.15 A Flood Risk Assessment and Drainage Strategy will be prepared to accompany the subsequent planning application and will consider the effects of climate change in drainage calculations as per standard industry guidance.

Risk to Human Health

- 7.2.16 During the construction phase there would be a potential for temporary impacts consistent with construction works i.e. noise from plant, dust and noise from vehicles and construction processes, lighting of works on shorter days, and surface water run-off from bare earth / stockpiles. However, the adoption of best practice measures will ensure that any impacts during construction are minimised and will be of a temporary nature for the duration of construction works. Best practice methods during construction will be set out in a CEMP which would be secured by way of a planning condition. A Principal Contractor will be appointed and all construction undertaken in accordance with the CEMP.
- 7.2.17 During operation, the Site will be secured and monitored remotely by CCTV to reduce risk of accidents. As aforementioned, the Proposed Development when operational does not produce any emissions or pollutants that would pose a risk to human health.
- 7.2.18 Additionally, an Outline Battery Safety Management Plan will address potential fire risk concerns associated with the BESS facility.

7.3 Location of Development

Existing and Proposed Land Use

- 7.3.1 The Site is within the countryside and comprises predominantly agricultural fields and parcels of woodland. The Proposed Development is for a BESS facility and co-located solar farm with a temporary operational period of 40 years. Following decommissioning, the battery and solar infrastructure would be removed, and the land would be returned to its pre-development state. Other elements of the Proposed Development such as the biodiversity enhancements will remain in place.
- 7.3.2 The Proposed Development would therefore not result in the permanent loss of agricultural land and would provide notable benefits to the biodiversity of the land. There will be continued agricultural use on the Site during operation of the Proposed Development with sheep grazing.

Relative Abundance, Availability, Quality and Regenerative Capacity of Natural Resources

- 7.3.3 The Site has been assessed by an Ecologist to determine the habitats and potential species present with further detailed surveys ongoing. The Proposed Development will seek to integrate ecological features into the design, through the retention of Ancient Woodland and linear hedgerow features, along with the provision of significant ecological

enhancements. These include additional planting such as hedgerow and species diverse grassland on-site. Corridors between onsite and offsite woodlands will be enhanced through planting and benefit commuting bats. There may also be the potential to provide wildlife corridors to further enhance the biodiversity of the Site.

- 7.3.4 According to the Provisional Agricultural Land Classification (ALC), the Site is predominantly within Grade 3 ALC. Part of the southeast and a minute part of the northwest is within Grade 2. A detailed Agricultural Land Classification Report will be carried out in order to confirm the grading of the Site and will accompany any forthcoming planning application. Given the availability of agricultural land in the vicinity of the Site, the scale of the Site relative to the land available and the reversible nature of the BESS and solar infrastructure, the continued agricultural use of the land during operation with sheep grazing the temporary reduction in agricultural land use is not considered to be significant.

The Absorption Capacity of the Natural Environment

- 7.3.5 The majority of the structures associated with the Proposed Development are low in height and the layout will be carefully designed, with appropriate planting to ensure that potential views into the Site are mitigated, where needed. Section 5.3 above provides detail on how mitigation design will ensure that the Site's impact does not spread into the wider landscape area.
- 7.3.6 Following decommissioning, the battery and solar infrastructure would be removed, and the land would be returned to its pre-development state. Other elements of the Proposed Development such as the biodiversity enhancements will remain in place. On this basis, the Proposed Development is not considered to have a long-term impact on the absorption capacity of the natural environment.

7.4 The Potential Impact

The Magnitude and Spatial Extent of the Impact

- 7.4.1 The geographical and spatial extent of any impacts is considered to be localised in nature due to being largely contained within the Site and the immediate area. Ecology, landscape, heritage, archaeology, highways, flooding, noise and human health impacts have been considered.

The Nature of the Impact

- 7.4.2 Highways, landscape and visual, ecology, heritage, archaeology, flood risk, agricultural land and air quality impacts have been considered. The nature of the impact is likely to be limited to landscape and visual and ecology, at a local scale and not considered to be significant in EIA terms as set out and demonstrated in Section 6.

The Transboundary Nature of Impact, the Intensity and Complexity of the Impact, and the Probability of the Impact

- 7.4.3 The likely impacts are of a low intensity and complexity and are not transboundary. Any impacts will be managed by the employment of best practice methods.

The Expected Onset, Duration, Frequency and Reversibility of the Impact

- 7.4.4 Any impacts during the construction phase will be temporary. Once operational, the Proposed Development will be carefully managed. No onsite personnel will be required therefore limiting the potential impacts to maintenance operations. Following decommissioning, the battery and solar infrastructure would be removed, and the land would be returned to its pre-development state. Other elements of the Proposed Development such as the biodiversity enhancements will remain in place.

The Cumulation of the Impact with the Impact of Other Existing and/or Approved Development

- 7.4.5 An assessment of cumulative impacts has been undertaken in the preceding sections. It is not anticipated that the Proposed Development results in significant effects.

The Possibility of Effectively Reducing the Impact

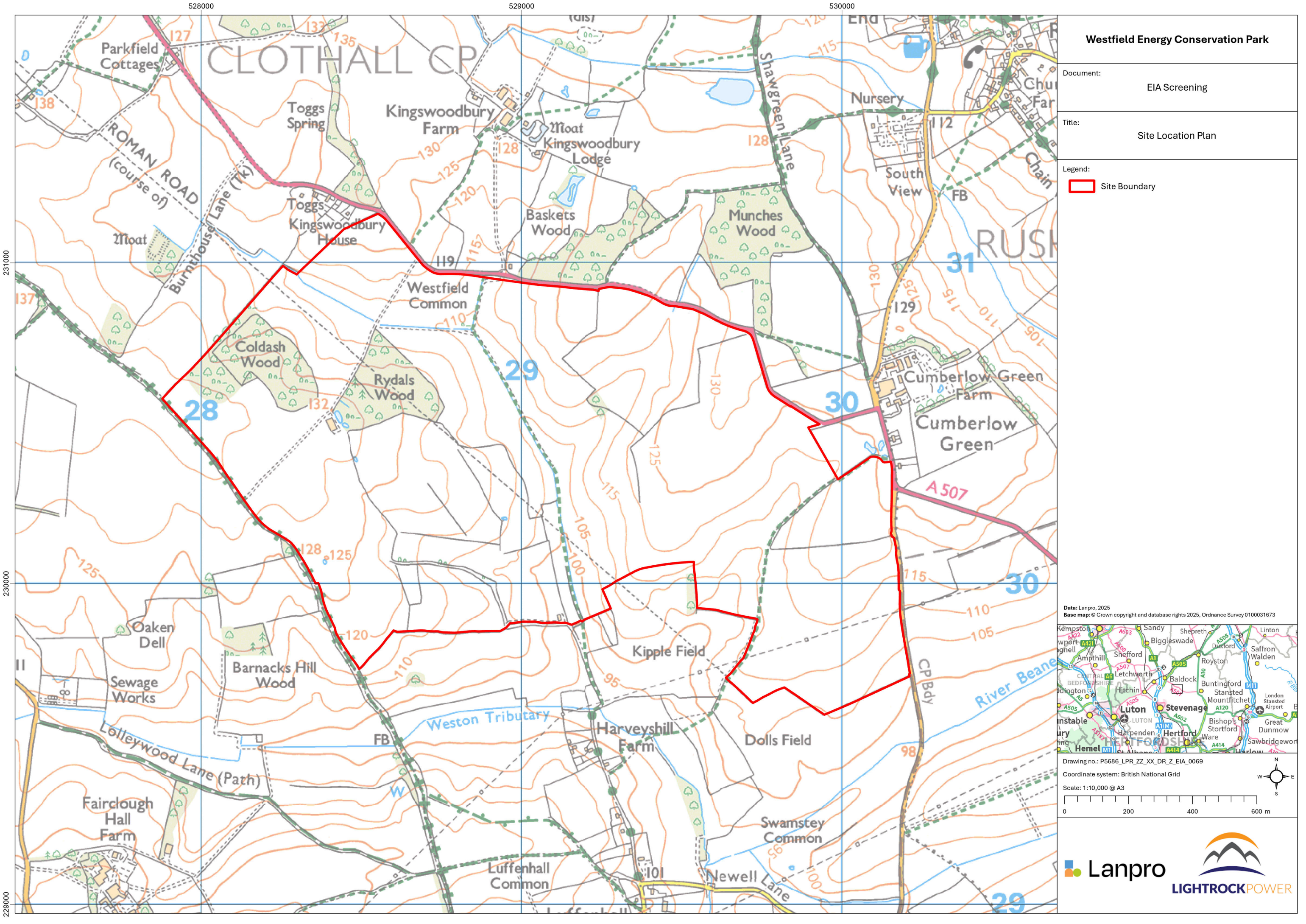
- 7.4.6 As set out in Section 6 under the individual environmental topics, embedded mitigation measures to reduce any potential impact of the Proposed Development will be carefully considered and incorporated into the Proposed Development, managed by best practice methods.

8 Conclusion

- 8.1.1 On behalf of Lightrock Power, Lanpro kindly request a formal Screening Opinion in accordance with the procedures and timescales as set out within the EIA Regulations and in accordance with the PPG.
- 8.1.2 It is anticipated that the Proposed Development by way of its location, operation and mitigatory works, is unlikely to give rise to any significant environmental effects. This conclusion has been reached in considering the potential effect of the Proposed Development, both on its own and cumulative with existing, approved and Proposed Development. On this basis, it is not considered that an EIA is required.
- 8.1.3 In addition to the information contained within this screening opinion request, we can confirm that the anticipated contents a forthcoming application will be as listed below.
- Application Form and Certificates;
 - Location Plan;
 - Site Layout Plan;
 - Landscape Plan;
 - Proposed Infrastructure Drawings;
 - Planning, Design and Access Statement;
 - Statement of Community Involvement;
 - Landscape and Visual Statement/Impact Assessment;
 - Agricultural Land Classification Report;
 - Ecological Appraisal;
 - Biodiversity Net Gain Statement;
 - Tree Survey and Arboricultural Impact Assessment;
 - Glint and Glare Assessment;
 - Ground Conditions Survey;
 - Heritage Desk Based Assessment;
 - Transport Statement;
 - Outline Construction Traffic Management Plan;
 - Noise Impact Assessment;
 - Flood Risk Assessment;
 - Drainage Strategy; and
 - BESS Safety Plan.

- 8.1.4 We trust that the information provided is sufficient to enable a response to the Screening Opinion request. However, should you require any additional information, please do not hesitate to get in touch.

Appendix 1 Site Location Plan



Westfield Energy Conservation Park

Document:
EIA Screening

Title:
Site Location Plan

Legend:
 Site Boundary

Data: Lanpro, 2025
Base map: © Crown copyright and database rights 2025, Ordnance Survey 0100031673



Drawing no.: P5686_LPR_ZZ_XX_DR_Z_EIA_0069

Coordinate system: British National Grid

Scale: 1:10,000 @ A3



Appendix 2 Photos of Designated Heritage Assets



Plate 1. View looking south of Cromer Windmill



Plate 2. View looking northwest from Cromer Windmill out towards the Site



Plate 3. View looking southeast from the southern extent of the Site towards Cromer Windmill



Plate 4. View looking southeast from the eastern extent of the Site towards Cromer Windmill



Plate 5. View looking west of the Site of Cumberlow Manor House Scheduled Monument



Plate 6. View looking southwest from the Scheduled Monument towards the Site



Plate 7. View looking northeast of the Site of Cumberlow Manor House Scheduled Monument

