

NURSLING BATTERY ENERGY STORAGE SYSTEM (BESS)

EIA Screening Request Masdar Arlington Energy March 2024

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Figure 1 Location Plan

Document history

	Name	Date
Author	Caitlin Chang	September 2023
Technical Reviewer	Joanna Berlyn	September 2023



1 INTRODUCTION

1.1 Purpose of Report

- 1.1.1 Stephenson Halliday (SH) have been instructed by Masdar Arlington Energy ('the applicant'), to formally request an Environmental Impact Assessment (EIA) Screening Opinion from Test Valley Borough Council, referred to as 'The Council', with regards to a proposal to construct a Battery Energy Storage System (BESS) on land at Upton Lane, Nursling, Southampton (NGR 436490, 116968), referred to as the 'Proposed Development'. The site will be known as Nursling BESS.
- 1.1.2 The request is made under Regulations 6 of the Town and Country Planning (Environmental Impact Assessment) (England) Regulations 2017 ('the EIA Regulations').
- 1.1.3 The following report provides the information necessary to enable Test Valley Borough Council to adopt a formal Screening Opinion.

1.2 The Proposal

- 1.2.1 The proposal is to install a 99.9MW BESS across an area of c. 3.6 hectares (ha). The facility will provide electricity balancing services to maintain sufficient power on the National Grid at times of high demand for electricity and provide essential support for the continuing deployment of renewable energy.
- 1.2.2 The Proposed Development will consist of battery container units which will have a similar appearance to cabinets and ancillary infrastructure (described in Chapter 3)
- 1.2.3 Further information regarding the Proposed Development can be found in Chapter 3 of this report.

1.3 Masdar Arlington Energy

- 1.3.1 Masdar Arlington Energy are passionate about their role in facilitating the UK transition to net zero and have an experienced team who have managed Battery Storage projects, Gas Peaking and Large-scale Solar PV sites across the entire lifecycle from development, through to construction and operation.
- 1.3.2 Masdar Arlington Energy have an evolving pipeline of over 3GW of projects and are now set for significant expansion of their operational portfolio.

1.4 Screening Process

- 1.4.1 In adopting a Screening Opinion, it is necessary for the Council to consider the scale, nature and location of the proposed development and the likelihood of significant environmental effects arising as a result.
- 1.4.2 For a type of development included under Schedule 1 of the EIA Regulations, EIA is mandatory. The proposed development is not a type that falls within Schedule 1.



- 1.4.3 Where development falls under Schedule 2, the need for EIA is determined based on a set of criteria, as follows:
 - Development falls within one of the classes of development stated in Schedule 2; AND,
 - EITHER exceeds the size threshold for that class of development; OR is in a sensitive area as defined by the EIA Regulations; AND,
 - It is likely to have significant environmental effects due to factors such as nature, size or location.
- 1.4.4 BESS are not developments specifically listed under Schedule 2 of the EIA Regulations. However, Schedule 2 refers to "Energy Industry" categories.
- 1.4.5 It is considered that the proposal falls within the category of *"industrial installations for the production of electricity, steam and hot water (unless included in Schedule 1)".*
- 1.4.6 Sensitive Areas as defined by the EIA Regulations include:
 - (a) Land notified under section 28(1) (Sites of Special Scientific Interest) of the Wildlife and Countryside Act 1981 (23);
 - (b) A National Park within the meaning of the National Parks and Access to the Countryside Act 1949 (24);
 - (c) The Broads;
 - (d) A property appearing on the World Heritage List kept under article 11(2) of the 1972 UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage;
 - (e) A Scheduled Monument within the meaning of the Ancient Monuments and Archaeological Areas Act 1979;
 - (f) An area of outstanding natural beauty designated as such by an order made by Natural England under section 82 (1) (areas of outstanding natural beauty) of the Countryside and Rights of Way Act 2000 as confirmed by the Secretary of State;
 - (g) A European Site.
- 1.4.7 The site does not lie within any of the sensitive areas as defined by the regulations.
- 1.4.8 The applicable threshold for 'screening' for EIA development is development that exceeds 0.5ha. The proposed development covers an area of 3.6 ha. and therefore exceeds the applicable size threshold.
- 1.4.9 As such, the Council must screen the proposal to ascertain whether there is likely to be any significant effect on the environment with reference to the following criteria set out in Schedule 3 of the EIA Regulations:
 - Location of the proposed development (e.g. environmental sensitivity of the area);



- Characteristics of the proposed development (e.g. size, cumulative effects with existing/approved development, use of natural resources, production of waste, pollution, nuisance, risk of accidents, and risk to human health); and,
- Types and characteristics of the potential effects of the proposed development (with particular regard to the extent, nature, magnitude and complexity, probability and duration, frequency and reversibility of the effect, including the likelihood for transboundary effects).

1.5 Need for Battery Energy Storage Systems

- 1.5.1 As the UK moves forward in the aim of mitigating the effects of climate change and achieving a carbon neutral economy, greener and more sustainable modes of power generation are being introduced which can be intermittent in character (e.g. Wind and Solar PV). This places certain demands on the electricity grid due to fluctuations in power generation and demand.
- 1.5.2 The National Grid experiences a large fluctuation in demand throughout the day and throughout different times of the year. In order to meet this fluctuation in demand, the National Grid models demand against capacity. In the National Grid ESO Electricity Capacity Report 2022, National Grid sets out its ambition for ensuring that there is sufficient capacity to meet demand. To achieve this, targeted supply capacity is set above maximum forecast demand, that is, National Grid is looking to ensure there is headroom in supply capacity. Therefore, storage solutions are an integral part of the grids strategy to manage meeting demand.
- 1.5.3 Historically, conventional power stations could ramp up electricity generation as and when necessary to do so. Renewable installations are unable to do this, thus, as the UK moves towards a more environmentally sustainable energy supply system, BESS are essential in allowing for a move away from non-renewable forms of energy generation. This is because they allow for the storage of electricity which can be exported to the grid when renewable forms of energy such as solar are unable to generate electricity.
- 1.5.4 BESS do not emit carbon dioxide and provide a balancing mechanism drawing electricity (charging) when levels on the National Grid are above that of demand. They represent an essential service needed to support the roll out of renewables and provide sub-second response times, in order to offer a solution to several of the National Grid's balancing issues. Thus, BESS support the development and deployment of low carbon intermittent energy technologies upon which society must increasingly rely to satisfy its energy requirements.

1.6 Energy Policy Context

- 1.6.1 The Energy White Paper (2020) sets out the UK Government's commitment to deliver net zero by 2050. The White Paper stipulates the importance of renewable energy schemes in reaching net zero by 2050 and also in ending coal in the electricity mix by 2025. The Paper highlights the good progress made to date but highlights "*There is still much more to do. Our energy system is dominated by the use of fossil fuels and will need to change dramatically by 2050 if we are to achieve net zero emissions*".
- 1.6.2 The White Paper recognises the importance of energy storage systems in achieving the goals of becoming carbon neutral. The Paper states that "*flexibility will come from new cleaner sources, such as energy storage in batteries*" and that "*By 2050, we expect low carbon options,*"



such as clean hydrogen and long duration storage, to satisfy the need for peaking capacity and ensure security of supply at low cost".

- 1.6.3 In recognition of the importance of energy storage in moving to net-zero carbon by 2050 (as required by the Climate Change Act 2008), and the interim target of 78% reduction in emissions by 2035 (required by the 6th Carbon Budget), the Government introduced legislative changes to encourage larger and more effective BESS to be processed by Local Planning Authorities. Previously, proposals for energy storage above 50MW were subject to approval through the National Significant Infrastructure Projects (NSIP) procedure. Since December 2020 however, such proposals are now to be assessed by Local Planning Authorities. In doing so the Government stated that: *"the planning impacts of the types of storage being deployed (predominantly batteries), are much lower than other forms of generation"*.
- 1.6.4 The British Energy Security Strategy policy paper was published in April 2022. This focused on strategies to ensure long-term secure, clean, and affordable energy for the UK. Within a section on 'networks, storage and flexibility', the paper outlined the importance of storage in improving the efficiency of the UK energy system.
- 1.6.5 The policy paper set out the two priorities for the UK energy system:

'anticipating need because planning ahead minimises cost and public disruption; and hyperflexibility in matching supply and demand so that minimal energy is wasted.".

- 1.6.6 More recently, the Committee on Climate Change (CCC) Progress Report to Parliament was published in June 2023 and provides a review of Government efforts over the previous 12 months in regard to Climate Change mitigation.
- 1.6.7 The foreword of the report highlights that several new climatic extremes were experienced in 2022, with the UK's first 40°C day and the UK's warmest year on record. The report continues:

"The record-breaking temperatures seen in the UK in summer 2022 brought unprecedented numbers of heat related deaths, wildfire incidents and significant infrastructure disruption. Human activities are causing our climate to change. Only decisive action will slow further changes".

1.6.8 The CCC make it clear that there has not been enough urgency in reducing energy demand and emissions in order to ensure the UK's greenhouse gas emissions commitments:

"While the policy framework has continued to develop over the past year, this is not happening at the required pace for future targets. The Net Zero target was legislated in 2019, but there remains a lack of urgency over its delivery. The Net Zero transition is scheduled to take around three decades, but to do so requires a sustained high-intensity of action. This is required all the more, due to the slow start to policy development so far".

- 1.6.9 The report states that the CCC consider grid storage to be on track due to the pipeline of gridscale battery storage however, this is assuming all are able to gain network connections. A full picture of the extent to which peaks in demand for electricity could be reduced by flexibility (time-shifting or reducing of demand) is not yet known.
- 1.6.10 The Test Valley Borough Revised Local Plan (2011-2029) was adopted in January 2016 and, as a whole, is supportive of developments that help mitigate and adapt to climate change. Whilst there is no specific policy relating to renewable energy or energy storage in the Local



Plan, objective 7 states that the Borough should "ensure development takes full account of climate change including implementing water efficiency measures".

1.7 Structure of the Report

- 1.7.1 The remainder of this report is structured as follows:
 - Chapter 2 provides a description of the site and its surroundings;
 - Chapter 3 provides details of the proposed development;
 - Chapter 4 considers the likely effects of the proposed development against the criteria set out within Schedule 3 of the EIA Regulations;
 - Chapter 5 lists what we propose to submit along side a planning application; and,
 - Chapter 6 provides a summary.



2 THE SITE

2.1 Site Location

- 2.1.1 The site is located within Hampshire, situated to the north of Upton Lane, c.900m north-west of the village of Nursling. The city of Southampton is located c.6km south-east.
- 2.1.2 The site is located c.20m east of the South-Western Railway and is also located in close proximity to the M27 and M271.
- 2.1.3 The site lies within the parish of Nursling and Rownhams and is situated entirely within the Test Valley Borough Council administrative authority area. Image 1 below illustrates the site location. (A Site Location Plan can also be found at Figure 1):



Image 1: Site location (Source: Google Earth)

2.2 Site Description

- 2.2.1 The site covers an area of c. 3.6 hectares and comprises one agricultural field, bordered by trees and hedgerows. An electricity pylon is present towards the north-west of the site, with electricity lines crossing the site in a west to east direction.
- 2.2.2 The entire site lies within Flood Zone 1 and therefore has a low probability of flooding, and sits adjacent to a watercourse, which lies to the west.
- 2.2.3 There are no Public Rights of Ways (PRoW) that pass through the site nor are there any located along the site boundary. The nearest PRoW is located over 400m south-east.
- 2.2.4 There are no Listed Buildings or Scheduled Monuments on site and the site is free from any statutory and non-statutory ecological designations.



2.2.5 The site lies within the open countryside, does not lie within the Green Belt or any designated landscapes.

2.3 Surrounding Land Use

- 2.3.1 The immediate landscape is predominantly in agricultural use, especially to the north of the site. The wider area becomes more urban to the south, where settlement becomes a dominant feature of the landscape, south of the M27.
- 2.3.2 The "Grove Place" retirement village lies adjacent to the south of the site and there are some commercial units located c.60m south. There is also a waste recycling facility located c.250m south.
- 2.3.3 There is a copse situated c.200m east of the site, and there are patches of woodland within the wider landscape. There is no Ancient Woodland within 1km of the site, with the nearest, Lymers Copse situated just over 1km east.
- 2.3.4 The nearest statutory ecological designation is the River Test Site of Special Scientific Interest (SSSI) which is located c.750m to the west. The Solent & Southampton Water Ramsar Site and Special Protection Area is also located c.1.4km to the south. Further detail on these designations is provided in Chapter 4.
- 2.3.5 There is a group of Listed Buildings located within 230m to the south-east of the site. The group comprises give Grade II Listed Buildings and one Grade I Listed Building. The nearest of which situated c.150m south-east, which is the Northcliffe School Garden Wall. This is discussed further in Chapter 4.
- 2.3.6 There are no World Heritage Sites, Conservation Areas, Scheduled Monuments, Registered Parks and Gardens or Registered Battlefields within 1km of the site.



3 THE PROPOSED DEVELOPMENT

3.1 Outline the Proposal

- 3.1.1 It is anticipated that the Proposed Development would comprise approximately 18 BESS blocks, comprising 2 pairs of battery cabinet racks and 1 PCS unit as well as associated ancillary infrastructure.
- 3.1.2 The batteries are housed in 1.3m x 1.3m cabinets, which in turn are assembled in 2 x 12 cabinet racks. The battery racks are 2.45m high at the tallest point. The cabinet racks would be supported by the following ancillary infrastructure:
 - Transformers/HV switchgear units, which would be installed on pads,
 - DNO/Battery control rooms, Private/DNO switch rooms;
 - Welfare unit;
 - Auxiliary transformers;
 - Standby generator and day tank;
 - Customer and DNO substations and:
- 3.1.3 Security fencing would be erected and is expected to be a 2.4 high palisade fencing or similar, and CCTV will be installed to enable remote surveillance of the site.
- 3.1.4 Internal access tracks will be installed within the site to allow maintenance vehicles to gain access to both the site and battery storage containers; these will be permeable hard surfaced tracks.

3.2 Construction

3.2.1 Construction of the development would typically take 18 to 24 months. Once operational, the development would largely be autonomous, and visits would be limited. The proposal will have a lifespan of 40 years, after which all equipment will be removed from the site and the land will be fully restored to agriculture.

3.3 Access

3.3.1 The site will be accessed via the existing concrete track that connects to Upton Lane, which is located to the south of the site. This access has existing infrastructure and offers good visibility due to the straight section of road, however some vegetation removal may be required to increase visibility. The existing track would be upgraded as part of the proposed development.



4 EIA SCREENING REQUEST

4.1 Introduction

4.1.1 An assessment of the proposed development against the selection criteria of Schedule 3 is provided below.

4.2 Characteristics of Development

4.2.1 The characteristics of development must be considered with particular regard to:

a) The size and design of the whole development

4.2.2 The site of the proposed development covers approximately 3.6 hectares of agricultural land which is bound by hedgerows and trees. The final BESS scheme will be designed following an iterative process whereby environmental constraints are identified, and the design and extent of the scheme adapted to ensure that any impacts are minimised. The limited height of the units (usually less than 3m above ground level), their non-intrusive structure and their benign, modular and ephemeral nature means that they can be well screened from the surrounding area and therefore not have a significant impact on the receiving environment. The construction and operational phases do not include any complex or hazardous works or operations and will not lead to any potential adverse environmental effects.

b) cumulation with other existing development and/or approved development

- 4.2.3 A desktop search reveals there are three approved battery storage developments within a 1km radius of the site. The applications summary and distance to the proposed site are as follows:
 - 18/01303/FULLS| Laying out of a battery storage facility, fencing and landscaping | National Grid Electricity Sub Station Road Nursling SO16 0AA| Approved July 2018 (situated c.800m south of the proposed BESS site)
 - 19/02772/FULLS| Erection of a battery storage facility| Shb Hire Ltd Mill Lane, Nursling, SO16 0YE (situated c.1.1km south-west of the proposed BESS site)
 - 21/02799/FULLS| Development and operation of a battery energy storage facility and associated infrastructure including boundary treatment and access| Land at Upton Lane, Nursling, Southampton, Hampshire, SO16 0XY| Approved January 2022 (situated c.430m south-east of the proposed BESS site)
- 4.2.4 Whilst there are three approved schemes within a 1km radius, there are patches of woodland in between the site of the Proposed Development and the approved BESS schemes, which assist in screening the site. Most pertinently, the M271 lies between the site of the Proposed Development and the nearest approved scheme (21/02799/FULLS).
- 4.2.5 Grove Place Retirement Village is located to the south east of the site, however noise mitigation measures will be included within the scheme, and the Proposed Development will be screened from the Village. BESS developments have reasonably small footprints and low vertical extents.
 - c) the use of natural resources, in particular land, soil, water and biodiversity



4.2.6 The Proposed Development will have an anticipated lifespan of approximately 40 years and requires limited maintenance. The proposed construction phase of the development will use resources in terms of land, water and energy but the operational phase would compromise of the storage of energy. This type of technology works well in tandem with, and facilitates the development of, other renewable energy sources. As a temporary permission is sought for the Proposed Development, the site will be restored to its original state and therefore any impacts would be reversed.

d) the production of Waste

4.2.7 The Proposed Development will not generate any waste during operation, aside from any required replacement of components.

e) pollution and nuisance

4.2.8 The development will emit some degree of noise, however a noise impact assessment will be undertaken to assess the potential impacts associated with noise, in accordance with the relevant standards and guidance, at the nearest noise-sensitive properties to the site. The noise assessment will ensure that appropriate mitigation is incorporated into the design to ensure acceptable levels of noise at the nearest receptors.

f) the risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge

4.2.9 The risk of any accidents is very low, and restricted to construction and maintenance activities, which will be covered by a site health and safety plan. The scheme will also be equipped with both automatic fire detection and suppressions systems.

g) the risks to human health (for example due to water contamination or air pollution)

4.2.10 The development would not involve the application of substances or technologies that would create a significant risk to human health. Battery storage developments are not associated with hazardous substances or toxic emissions to air. Therefore, it is considered unlikely that the proposals will have a significant effect on air quality.

4.3 Location of Development

- 4.3.1 The environmental sensitivity of geographical areas likely to be affected by development must be considered, with particular regard to:
 - a) the existing and approved land use
- 4.3.2 The Proposed Development footprint is an area of land currently used for agriculture. The site contains no statutory designations for landscape, heritage and ecology.
 - b) the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area its underground
- 4.3.3 The site is rural in nature which is surrounded by farmland, woodland and agricultural buildings. The Proposed Development will have a lifespan of 40 years, after which all equipment will be removed from the site and returned to agriculture.



c) the absorption capacity of the natural environment

- 4.3.4 Due to the existing vegetative boundaries, the Proposed Development can be absorbed well into the landscape with the incorporation of additional planting where necessary. Grove Place Retirement Village lies adjacent to the site to the south, however additional mitigation planting will screen the site from the Retirement Village.
- 4.3.5 The nearest statutory ecological designation is the River Test Site of Special Scientific Interest (SSSI), designated for its biological interest, located c.750m to the west. This SSSI is a classic chalk stream which is a species-rich lowland river. The Test supports a high diversity of invertebrate species and is especially rich in aquatic molluscs. The Solent & Southampton Water Ramsar Site and Special Protection Area is also located c.1.4km to the south. Given the distance and intervening land uses, the proposal is unlikely to have a significant adverse impact on these designations.
- 4.3.6 The site is located within Flood Zone 1 and therefore has a low risk of flooding. The nearest designated heritage asset is the Grade II Listed Northcliffe School Garden Wall located approximately 150m to the south-east of the site. Given the character of the site and lack of intervisibility as well as the screening provided by trees and the modern buildings within the retirement village complex, it is unlikely there will be harm to the nearest heritage assets.
- 4.3.7 The site is not located within any protected landscape and is free from any designations within the Test Valley Local Plan.

4.4 Types and Characteristics of the Potential Impact

- 4.4.1 In terms of the Types and Characteristics of the potential impact:
 - (a) the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected)
- 4.4.2 The site measures c.3.6 ha. The site is located in close proximity to the Grove Place Retirement Village, Casa Aquila Farm (owned by the landowner), and a dwelling located c.70m south, which are the only residences that could be impacted by the proposed development. The design of the scheme will incorporate mitigation measures to ensure that any visual or noise impacts are acceptable. The site is located approximately 900m from the nearest village (Nursling). The scale of construction and benign nature of operation means the BESS facility within the rural setting is unlikely to significantly affect an area of population.
 - (b) the nature of the impact
- 4.4.3 Due to the benign nature of the proposal impacts are not expected to be significant.
 - (c) the transboundary nature of the impact
- 4.4.4 The development site would not cross or impact upon local authority boundaries as impacts beyond the site boundary would be limited in extent.
 - (d) the intensity and complexity of the impact



4.4.5 The magnitude or complexity of any impacts resulting from the proposal would not be significant due to the modular nature of the facility and that there are no emissions to the atmosphere.

(e) the probability of the impact

4.4.6 Technical and environmental assessments that will accompany the planning application will enable an iterative design process to ensure that any potential impacts will be limited.

(f) the expected onset, duration, frequency and reversibility of the impact

4.4.7 Once the proposal has reached the end of the operational period, the site can be fully restored back to farmland.

(g) the cumulation of the impact with the impact of other existing and/or approved development

4.4.8 The site is rural in nature being surrounded by agricultural land. Given the proximity to the Grove Place Retirement Village, there is potential for effects through noise generation. However, attenuation measures can be put in place to ensure these are acceptable and would not be significant. Visually, the site benefits from established vegetation (in the form of hedgerows) that assist in screening views from public areas; further mitigation will be considered as part of the technical assessments.

(h) the possibility of effectively reducing the impact.

4.4.9 Technical and environmental assessments that will accompany the planning application will enable an iterative design to reduce impacts to the receiving environment.

4.5 Conclusion

- 4.5.1 The benign nature of the Proposed Development and its screened location will provide limited opportunity to create significant environmental effects on identified receptors.
- 4.5.2 It is considered that the location and characteristics of the Proposed Development (as detailed within Schedule 3) are not likely to have the potential for 'significant' environmental effects and would not constitute EIA development.
- 4.5.3 It is therefore considered that an EIA is not required in connection with the above development; confirmation is sought from the Council.



5 PLANNING APPLICATION SUBMISSION

- 5.1.1 Notwithstanding the findings of this EIA Screening Report, it is proposed that the planning application would be accompanied by the following assessments relevant to environmental impact considerations:
 - Planning Statement;
 - Design and Access Statement;
 - Landscape and Visual Impact Assessment, including Landscape Mitigation Plan;
 - Heritage Assessment;
 - Transport Statement;
 - Noise Assessment, including noise mitigation measures;
 - Detailed Agricultural Land Classification Survey including soil testing;
 - Flood Risk Assessment;
 - Tree Survey and Arboricultural Assessment; and,
 - Ecological Assessment and Biodiversity Net Gain plan.
- 5.1.2 The surveys will be undertaken pre-submission in order to provide a comprehensive evidencebacked application that fully assesses and addresses actual or potential environmental impacts.
- 5.1.3 It is requested the Council inform SH if there are any other additional reports that would be required for the validation of the application.



6 SUMMARY

- 6.1.1 Masdar Arlington Energy propose to install a 99.9MW BESS, located to the north-west of Nursling.
- 6.1.2 This EIA Screening Request provides a description of the proposed development and the anticipated likely effects on the environment in line with the requirements of Regulation 6 (2) and Schedule 3 of the EIA Regulations.
- 6.1.3 The Proposed Development falls within a category set out within Schedule 2 of the EIA Regulations which requires developments to be 'screened' as to whether they constitute EIA development.
- 6.1.4 Whilst there will be some localised effects upon the environment as a consequence of the scheme, due to the nature of the location and characteristics of the development none of these are deemed likely to generate 'significant effects' upon the environment as set out in the relevant guidance. Accordingly, it is considered that the Proposed Development does not constitute 'EIA development'. Confirmation is sought from the Council in the form of a Screening Opinion.
- 6.1.5 Whilst we consider the Proposed Development not to constitute EIA development, the planning application would be supported by environmental assessments necessary to enable the Council to assess the impacts of the development and consider it against relevant local and national policy. Confirmation is sought from the Council in relation to the assessments proposed.



Figure 1 Location Plan

