

Robert Gandy
Enzygo Ltd (Sheffield Office)
Samuel House
5 Fox Valley Way
Stocksbridge
Sheffield
S36 2AA

Our Ref: GEN/24/00497
Direct Line: (023) 07442800996
Ask For: Mrs Arleta Miszewska
Email: planning.development@havant.gov.uk

30 September 2024

Site Location: Land at Bedhampton Pumping Station, Meyrick Road, Havant
Re: Environmental Impact Assessment Screening Opinion for a battery energy storage system (BESS)

Dear Mr Gandy

I am writing to you in regard to your enquiry in relation to the above address. Please find my full response below.

Description of the site

The site is approximately 1ha in area which lies at the western end of Meyrick Road in Bedhampton within Portsmouth Water's Bedhampton Water Treatment Works (WTW). The railway line is to the north-east of the site. To the east, there is a group of three buildings associated with the water treatment works beyond which there is a solar panels farm. The area adjacent the site is predominantly undeveloped greenfield with a network of access routes running to the north and west of the site.

The Hermitage Stream runs to the south of the site. The railway line runs north to west of the site.

Footpath 34/35 runs south-east of the site and then alongside its southern and western boundary towards the railway line and then leads south-west along the railway line and away of the site.

The Old Bedhampton Conservation Area lies approximately 50m to the north and west from the site.

Description of development

The submission confirms that the proposed 150MWh battery storage facility would consist of the following elements:

- 132kV Switchyard
- 132/33kV Power Transformer
- DNO Protection / Control Room
- Private 33kV Switchroom
- Private Control Room
- Private 33/0.4kV Auxiliary Transformer
- Private Stores / Metering / Welfare Building [max 2.44m x 6.1m x max. height of 3m above ground]
- 2.4m Palisade Fence
- 3.5m Acoustic Fencing

- 60 units of BESS containers
- 10 units of Power Conversion System
- 2 units of spare parts containers - 2.44m x 6.10m x 3.0m above ground max height
- Parking for maintenance vehicles
- CCTV Equipment
- Site Lighting

The proposed batteries would be single stack and would be arranged in rows. There would be a dedicated space for routine maintenance between each row of batteries. The substation and control rooms would be of simplistic construction with an external finish to blend in with the surroundings. The submission confirms the size of the Private Stores / Metering / Welfare Building to be approximately 2.44m x 6.1m x max. height of 3m above ground. Further 2 units of spare parts containers would be approximately 2.44m x 6.10m x 3.0m above ground max height.

There would be an internal access road for maintenance staff to service the equipment from a transit sized van. Construction access would be provided from Meyrick Road which connects with the wider road network including the M27 and A3(M).

Consultee comments:

Conservation Officer – not an EIA development.

Ecologist – the proposed development is not likely to meet the threshold of requiring full EIA; the potential ecological impacts would not be insignificant but would not be significant as defined by the Regulations, any future submission should be supported by an ecological assessment due to ecological features within and adjacent to the site that will require consideration.

Environment Agency – no response received.

Environmental Health - should a formal application be made, a full noise impact assessment will be required to be carried out for the proposed facility. The proposal is for a battery storage facility and there is potential for low frequency noise (LFN) impacting on the neighbouring residents. The neighbouring land to the West and East of the application has been identified as a potential land for future redevelopment. The closest residential houses to the facility are along Kings Croft Lane to the West and Boyle Close to the East. Therefore, the applicant is required to provide a noise assessment of the proposed scheme. The assessment must consider the impact of LFN upon the residential houses. This should be provided prior to determination of ANY application, as recommendation for a planning condition will not be suitable in this instance.

Environmental Health (Contaminated Land) –subject to conditions, not an EIA development; ground contamination assessment/mitigation and the construction environmental management plan could be managed by a suitable planning condition; the proposed technology carries significant intrinsic risk of accident which requires careful management, and the development is proposed on a site which is acknowledged to have several environmental sensitivities; it would seem reasonable to conclude that the worst-case fire load would not lead to significant impacts, contingent on some reasonable mitigations in line with the example specification; a catastrophic installation-level failure may also be dismissed on probability grounds, subject to appropriate design & additional redundancies to manage the principal risk – namely that posed to the public potable water supply; human health, transport & deposition risks are dismissed as not being significant on the basis of the design-worst-case fire scenario having broad equivalence to the example specification; risks to controlled waters and ecology (from excess fire control water under a catastrophic failure scenario-) are dismissed on the basis of a low probability of occurrence combined with spatial extent & severity of impact upon occurrence.

Hampshire Fire and Rescue – general comments only in respect of access onto the site by Fire and Rescue. Any other relevant matters can be dealt with during planning application

stage.

Hampshire Highways - the development is of a scale that the applicant will need to provide a full Transport Assessment. This will fully assess the transport and highway impact of the proposed development and identify suitable mitigation measures. The TA should set out the baseline traffic and transport conditions, provide trip generation and distribution information and assessment of local junctions using industry standard capacity models. The assessment should also review the latest available personal injury accident information for a five-year period and set out suitable mitigation proposals. Additionally, any future TA needs to consider the interaction with the Kingscroft Farm development (APP/22/00669), the Havant Thicket pipeline (APP/20/00990 and APP/24/00204) and the Southern Water DCO application. Any proposed development should not compromise on the deliverability of the works being secured as part of these planning applications.

HCC Archaeology – there is no indication that this proposal would require the submission of an ES for archaeological reason; a Heritage Statement should be submitted with any planning application. The statement should consider the available archaeological evidence, past and present land use, the archaeological potential of the area and the impact of the development. The document should also assess the potential impact that might be caused by the proposed development. The heritage statement should seek to set out what mitigation, if any, would be considered an appropriate response.

HCC Countryside Access Team - Havant Footpath 34 (FP34) runs along the western and southern boundary of the proposed development site, where it continues south towards the A27; Havant Footpath 34 forms part of the Wayfarers Walk, a promoted walking route; the proposal has no direct impact on the PROW. The site is within close proximity to FP34 which will have transient views of the proposals; we have concerns of the visual impact and the view from FP34; future plans for pipe work and development around, on or over FP34 is proposed; the Service raises significant concerns over the future public safety and priority of PROW users as a result of these proposals, with the expectation that these are evaluated and addressed accordingly, when reviewing this application and impending proposals. Informatives recommended.

HCC Lead Local Flood Authority - Due to the size of the development, we would expect to see a full Flood Risk Assessment with a surface water drainage strategy. If the proposals include works to an ordinary watercourse, prior consent of the Lead Local Flood Authority is required for this work. We would highlight that we would expect all watercourse routes to be retained as close to their current alignment as possible. Also, flow paths, as recognised by the Flood Map for Surface Water, should also be retained and provisions made to allow this route to continue to flow post development without adversely impacting the development.

HCC Strategic Planning Team – no response received.

Health & Safety Executive – no response received.

Landscape Team – application should be accompanied by a Landscape Visual Impact Assessment.

Langstone Harbour Board – no response received.

National Grid – there are no National Grid Electricity Transmission assets affected in this area. If you would like to view if there are any other affected assets in this area, please raise an enquiry with www.lsbud.co.uk. Additionally, if the location or works type changes, please raise an enquiry. Please note this response is only in reference to National Grid Electricity Transmission assets only. National Gas Transmission (formerly National Grid Gas) should be consulted separately where required.

Natural England – on the basis of the material supplied with the consultation, that significant effects on statutorily designated nature conservation sites or landscapes are unlikely.

Network Rail – no response received.

Open Space Society – no response received.

Planning Policy – comments in respect of flood risk.

Portsmouth Water – following receipt of further information and subject to appropriate planning conditions being imposed at planning application stage, the proposed development is not considered to be an EIA development.

Principal Climate Change Coordinator – general comments only.

Royal Society for the Protection of Birds - no response received.

Ramblers Association – not an EIA development, however, at planning application stage the development should be screened visually from the footpath, and for any noise (eg. cooling fans) be directed away from the path; there will be localized impact of the development on the PRow footpath (Havant34) which runs adjacent to the south and west boundary of the site; the existing high 'bund' which separates the footpath and development should shield the path from any noise but there are gaps at either end of the 'bund'; any noise produced, even if small, should not be located directly adjacent to the footpath.

Southern Gas Network - no response received.

Southern Water - capacity assessments will be required to determine if the existing sewerage system can accommodate the proposed development flows; a formal application for a connection to the public foul sewer to be made by the applicant or developer; in situations where surface water is being considered for discharge to our network, we require the below hierarchy for surface water to be followed which is reflected in part H3 of the Building Regulations. Whilst reuse does not strictly form part of this hierarchy, Southern Water would encourage the consideration of reuse for new developments.

Assessment

The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) set out that Environmental Impact Assessments (EIAs) are needed for certain developments whereby the proposal is to have likely significant effects on the environment. The application seeks a Screening Opinion to be considered in accordance with Regulation 5 of the Town and Country Planning (Environmental Regulations 2017). The key issues for consideration are:

- whether the proposed development would comprise a Schedule 1 or Schedule 2 development for the purposes of the Regulations; and if so,
- whether the development is EIA development requiring any future planning application to be accompanied by a full Environmental Statement being mindful of factors such as the nature of the development, size and location and the requirements of Schedule 3 of the Regulations.

In undertaking the assessment, the applicant is obliged to provide enough information about the proposed development for the Council to make an adequate assessment, such as providing a description of the development and a plan of the site location. Such information has been received for this submission against these requirements.

Schedule 1 Development

It is considered that the proposed development does not fall within any of the categories of development listed in Schedule 1 of the Regulations, which comprise potentially the most significantly harmful forms of development in terms of environmental risk. As such an assessment of the proposal is required to determine whether it falls within the remit of Schedule 2 of the Regulations.

Schedule 2 Development

Schedule 2 development is deemed to be those forms of development listed within Schedule 2 of the Regulations which:

- i) has any part of the development located wholly or partly in a 'sensitive area' as defined in Regulation 2(1) or
- ii) meets one of the relevant criteria or exceeds one of the relevant thresholds listed in Schedule 2.

In having regard to criteria i) above, the site is not located 'wholly or partly' within any Site of Special Scientific Interest (SSSI), a National Park, the Broads or a property appearing on the World Heritage List, a scheduled monument, an AONB or a European site. Therefore the site is not located in a sensitive area as defined in Regulation 2(1).

For the purposes of criteria ii), the development would involve industrial installations for the production of electricity within a site exceeding 0.5ha in area, falling within subcategory 3(a). Therefore, the development would be classed as a Schedule 2 development that needs to be screened against criteria set out in Schedule 3 to ascertain whether the development is an EIA development.

Development proposals that are considered to be Schedule 2 development are only considered to be EIA development if the development is likely to have significant effects on the environment. Guidance on assessing the potential environmental impact is given in Schedule 3 (Selection criteria for screening Schedule 2 development) of the 2017 Regulations and sets out three categories for consideration:

1. Characteristics of development;
2. Location of Development; and
3. Characteristics of the potential impact.

The proposal is considered against each of these criteria below.

1. Characteristics of development

The characteristics of development must be considered with particular regard to—

- (a) the size and design of the whole development;
- (b) cumulation with other existing development and/or approved development;
- (c) the use of natural resources, in particular land, soil, water and biodiversity;
- (d) the production of waste;
- (e) pollution and nuisances;
- (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;
- (g) the risks to human health (for example, due to water contamination or air pollution).

In addressing criteria a) and b), the overall size of the development site is approximately 1ha. Whilst the size of the site can be apparent from public vantage points alongside the Footpaths 34 and 35, due to the wider site being surrounded by a built form, the site does not form a part of a wider open landscape. The development would include a series of buildings of varied sizes but not exceeding 2.44m x 6.10m x 3.0m above ground together with an associated infrastructure leading to a fairly high level of ground cover.

From some vantage points, the site would be visible in connection with the existing solar panels farm at Palk Road. There are no other existing or consented energy infrastructure projects near the site that should be considered in respect of cumulative impacts.

With regard to criterion (c), the development is not considered to be a form which would require the significant use of natural resources other than the extensive land area required to deliver the intended 150MWh battery storage facility.

Criterion d) addresses the level of waste to be generated by the development. This is considered to be minimal given that the only excavations required are likely to be for cable trenches. The construction of the main infrastructure of the development would be likely to produce minimal soil waste. The submission also confirms that the operation of the proposed development would not create any waste material. Any material left at the end of the lifetime of the development could be recycled.

In addressing criterion e) relating to pollution and nuisance impacts, the proposed nature of the development is also not considered to create such significant pollution or nuisance as to qualify for a full EIA with such matters able to be addressed through the planning process. Details of the storage of the batteries and other equipment can be detailed and considered within the planning process.

In considering other potential sources of pollution, notably the site is not within any Air Quality Management Area and it would be expected that matters of noise and air pollution would be appropriately assessed within the context of the planning application. With regard to land contamination, the proposed development would be expected to incorporate measures to ensure that the potential for contamination arising from the construction of the site (e.g. fuel spills) is minimised. Such measures would need to be appropriate for the existing ground conditions and the hydrogeology of the site. The Council's Contaminated Land Officer concluded that ground contamination assessment, mitigation and the construction environmental management plan could be secured with a suitable planning condition. Given that these matters would be considered in full within an application, it is not considered that the effects would be of such significance as to warrant a full Environmental Impact Assessment.

The site is located within the Portsmouth Water Source Protection Zone 1 and lies next to an important Bedhampton Spring complex. Portsmouth Water initially considered that the development could result in significant environmental effects without sufficient mitigation. It had been noted that the submission claiming that there would be no residual effects from the development was not supported with sufficient justification.

Portsmouth Water considered that the applicant should be providing an enhanced level of justification to address environment risks and mitigation. Therefore, further detailed assessments were originally requested as part of an Environment Statement. The assessments were expected to include risk identification and assessment, their proposed mitigation measures, and to report the residual effects which Portsmouth Water would then be able to comment upon as part of any future planning application.

Portsmouth Water has provided the following information to highlight the sensitive nature of the environment on which this development is proposed and the considerations which will need mitigation:

- Hydrogeological Risk Assessment

- i. The site lies above a principal aquifer (SPZ1) and in close proximity to the Bedhampton springs. Groundwater under this site also feeds into the internationally/nationally important habitat in Langstone Harbour (Ramsar, Nature 2k, SSSI, SAC & SPA designations). Therefore, the risks posed to groundwater by this installation need to be fully understood and mitigated.

- Landfill removal risk assessment and method statement

- i. The site is subject to a Landfill permit for the deposition of inert material. Portsmouth Water are currently assessing the treatment and reuse of this material and the closure and surrender of this permit.
- ii. Further to the above, removal of the landfill material onsite has the potential to mobilise any contaminants contained within. This has the potential impact on the principal aquifer below the site, any springs used for public water supply and Langstone Harbour.

- Fire control strategy report
 - i. BESS operations pose a potential fire risk from thermal runaway. A clearly defined and agreed strategy in the event of a fire is required. A fire on this site has the potential to cause significant pollution to the important receptors mentioned above.
- Construction Environmental Management Plan
 - i. Fugitive emissions from the site during construction could pose a significant threat to Langstone Harbour, groundwater and the local public water supply source.
- Invasive Non-Native Species (INNS)
 - i. There is known presence of Japanese Knotweed along the route of the proposed cable. We will request detailed designs and method statement for to tackle the presence of the knotweed and prevent its spread.

In response to Portsmouth Water conclusions, the applicant has provided the following documents:

- Request for Environmental Impact Assessment Screening Opinion - SHF.3055.001.PL.R.002.01 – EIA Screening Opinion - April 2024
- QUALITATIVE HYDROGEOLOGICAL IMPACT RISK ASSESSMENT - Brown 2 Green Associates Ltd – July 2024

Having reviewed the additional information, Portsmouth Water agreed that appropriate conditions applied at the planning application stage would appropriately control and manage environmental impacts and the development would not therefore constitute an EIA development.

Also of relevance to pollution and nuisances, it is acknowledged that there would be noise and disturbance during construction and that the construction process in particular would generate an increase in traffic movements which have potential to be a local nuisance in the area. This, however, could be addressed through a Construction Management Plan secured through the planning process following an assessment of the likely traffic impacts and is not considered to be of a level to require an EIA on the grounds of nuisance.

Any background noise generated by the development could also be addressed through the consideration of a planning application with supporting information detailing the level of noise and its impact upon sensitive receptors.

Finally, in having regard to criteria 1(f) and (g), there is potential for new hazardous materials to be introduced to the area attributed to the equipment on site with a risk of accidents or harm to the natural environment or human health. The submission states that: “The development is a passive development in that there will be no pollution or emissions of gas or waste, will not cause a risk of accidents or impact on human health.”

Whilst no representation has been received from the Environment Agency, these matters have been carefully considered by the Council’s Contaminated Land Officer, including the potential for significant environmental impacts from the technology risk being realised, the resultant thermal runaway being uncontrolled propagating into a fire of significant scale (emissions to air & related), which could require the application of substantial volumes of water (which may become contaminated and pose a risk to the public potable supply & to local controlled waters). The submitted information (including results of a large-scale fire testing, clarification of the fire management system, thermal propagation behaviour, and the expected scale of loss under an uncontrolled fire scenario) suggests that the potential scale of emissions to the air and the volume of water required for defensive actions would be limited. Therefore, it is reasonable to conclude that the worst-case fire load would not lead to significant impacts, contingent on reasonable mitigations appropriate for the particular specification of the

technology to be used on site.

In addition, Hampshire Countryside Team has commented that the development has the potential to impact the safety of the users of the public footpaths running near the site. However, this could be satisfactorily assessed at the planning application stage and managed through the Construction Environmental Management Plan secured with a planning condition. Hampshire Fire and Rescue Services provided comments on this request noting that an appropriate access onto the site for Fire and Rescue Services would be required, and confirming that any relevant matters could be dealt with and required safety measures secured under the planning application.

It is clear that further details will need to be submitted to accompany any planning application in any event to satisfy the above concerns. However, based on the information available at this stage, the characteristics of the development are not considered to lead to such likely significant effects as to require an EIA.

2. Location of development

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;
- (b) the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground;
- (c) the absorption capacity of the natural environment, paying particular attention to the following areas—
 - (i) wetlands, riparian areas, river mouths;
 - (ii) coastal zones and the marine environment;
 - (iii) mountain and forest areas;
 - (iv) nature reserves and parks;
 - (v) European sites and other areas classified or protected under national legislation;
 - (vi) areas in which there has already been a failure to meet the environmental quality standards, laid down in retained EU law and relevant to the project, or in which it is considered that there is such a failure;
 - (vii) densely populated areas;
 - (viii) landscapes and sites of historical, cultural or archaeological significance.

With regards to criterion a) the site is a part of the wider Portsmouth Water Bedhampton Water Treatment Works. The environmental sensitivity of this land loss is not considered to be significant geographically given the absence of any designated 'sensitive area' on the site. Instead, the loss of the land would need to be balanced against the provision of renewable energy that could contribute towards the wider aims and ambitions for addressing climate change. It is also noted that the facility is proposed for approximately 30 years, after which the site could be brought back to its original use.

In addressing criterion b) the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground, it is acknowledged that the site is not a sensitive site, i.e. there are no statutory designations for landscape, ecology, heritage assets or agriculture. Its temporary loss should be balanced against the benefits of the proposed development, i.e. the potential for enhancement of the immediate landscape and biodiversity of the site as well as the provision and storage of energy that could contribute towards the wider aims and ambitions for addressing climate change.

Criterion c) has regard to the capacity of the natural environment to absorb the development which in turn reflects upon impacts to wetlands, ecological sites, landscapes and heritage assets which are addressed below.

Riparian areas

The site lies within a coastal zone and just outside of Flood Zones 2 and 3, however, the Council's Strategic Flood Risk Assessment (SFRA) shows that the land may be at risk in the future once climate change is taken into account. This also relates to the access onto the site. The SFRA is currently being updated and a new version is expected to be published later this year. On the basis that the land is at risk in the future, both a Flood Risk Assessment and a Sequential Test would be required at planning application stage to demonstrate that attempts have been made to avoid areas at risk and that the development will be safe.

In addition, the site lies within the Estuary Buffer Zone associated with the Hermitage Stream that runs to the east and south of the site. Policy AL7 supports improvements to the Hermitage Stream and its surroundings and seeks to prevent development which prevents improvements being made to this environment. Given the physical appearance of the proposal, its impacts on the environs of the stream will need to be carefully considered and where necessary mitigated.

The Environment Agency mapping also shows some surface water drainage flooding, mainly within the northernmost and southern parts of the site.

The submission confirms that:

“A SuDS drainage scheme is proposed to manage runoff from the development. Gravelled areas will be provided around the battery/concrete bases, which will allow runoff to shed onto the permeable areas where it will be attenuated before discharged to the adjacent watercourse. The access track will also be gravelled to facilitate infiltration at source.”

The Lead Local Flood Authority has commented on this proposal and has not stipulated that the flood risk is of such significance to require an EIA, but did advise that comprehensive supporting information would need to accompany a planning application. This would include a Flood Risk Assessment with a surface water strategy. Further comments offered are in respect of a prior consent from the Lead Local Flood Authority being required in order to undertake any works to an ordinary watercourse and the expectation that such works would not involve changing of the watercourse routes, meaning that culverting of a watercourse would not be permitted unless there are no alternatives. Finally, the Lead Local Flood Authority also advised that any recognised surface water flow paths should be retained and provisions made to allow this route to continue to flow post development without adversely impacting the development.

Landscape

The site and its surroundings do not lie within any designated landscape area, with the wider area being both residential and industrial comprising a variety of built form, open space and associated infrastructure.

The scale of the proposal with its substantial area and required infrastructure would generate likely significant effects for a prolonged period of time upon landscape character and visual amenity, including views from the rights of way that run near the site, and this would be particularly evident during the months of the year when vegetation is not in full leaf. However, these impacts would not be severe or harmful, and could be minimised by an appropriate visual and landscape mitigation at the planning application stage. The Council's Landscape Officer was consulted and recommended that a landscape visual impact assessment is carried out to understand any effects of the development and form the basis for mitigating any visual and landscape impacts on the nearby public footpath and the setting of the conservation area. The Ramblers Association also commented on the proposal and requested that, at a planning application stage, any visual and noise impacts of the development on the public rights of way (Havant 34, which runs adjacent to the south and west boundary) should be assessed. This is because there are existing gaps in the existing high 'bund' which separates the footpath and the development, and therefore does not provide sufficient shielding.

Therefore, it is concluded that the impact on landscape character, visual amenity and the

PROW can be reasonably considered through the planning application process, hence not warranting the need for an EIA.

Ecology

In terms of ecological sensitivities, the site is not located within or partly within any Site of Special Scientific Interest (SSSI), Special Area of Conservation (SAC), Special Protection Area (SPA) or Ramsar Site and the proposed development is not likely to significantly affect the notified interest features of such sites. The proposal is not located within or partly within a National Park, Area of Outstanding Natural Beauty or Heritage Coast and is unlikely to impact upon the purposes for which these areas are designated or defined.

The Council's Ecologist has commented on the submission in terms of the impacts of the proposed development on the ecological features on site and concluded that, whilst the potential ecological impacts would not be insignificant, they would not be significant as defined by the EIA Regulations. However, any future submission should be supported by an ecological assessment due to ecological features within and adjacent to the site that will require consideration and mitigation.

Mitigation would therefore be necessary to minimise the effects arising, and this can be assessed and secured at the planning application stage. The proposed development does not give rise to such significant adverse effects as to require a full Environmental Impact Assessment.

Heritage

Criterion c) viii) has regard to 'sites of historic, cultural or archaeological significance'. In terms of archaeology, the site does not contain any above ground heritage assets within its boundary, however, it has been recognised as having notable historic interest with regard to its below ground archaeology and relationship to the wider setting of heritage assets.

The HCC Archaeologist has identified that the site lies within a wider area of some archaeological potential, with recent archaeological investigations within the vicinity of the site indicating the presence of later prehistoric occupation and funerary practice. The site also sits on the edge of an area of archaeological potential related to the possible locations of water mills referenced within Domesday. The site can, therefore, be said to have an archaeological potential. However, the potential is not such that would require the submission of an EIA to understand the impacts.

The supporting information confirms that any forthcoming planning application would be supported with a 'Heritage Statement and Archaeological Assessment' and the HCC Archaeologists require that such Statement considers the available archaeological evidence, past and present land use, the archaeological potential of the area and the impact of the development. The document should also assess the potential impact that might be caused by the proposed development. The heritage statement should seek to set out what mitigation, if any, would be considered an appropriate response.

In terms of above ground heritage, the nearest heritage assets include:

- Old Bedhampton (Conservation Area) – 0.03km north of the site
- Bedhampton Arts Centre (The Old School) (Grade II Listed) – 0.24km north of the site;

Further afield, sitting within approximately a 1km radius from the site comprise a number of above ground heritage assets comprising:

- The Golden Lion (Grade II Listed) – 0.65km north of the site;
- The Old Mill House (Grade II Listed) – 0.31km southwest of the site;
- Brockhampton (Conservation Area) – 0.39km west of the site.

The Screening Request has therefore also been subject of consultation with Historic England and the Council's Conservation Officer. Whilst no view has been received from Historic England, the Council's Conservation Officer has provided informal comments concluding that

the scale of the development, its impact upon the landscape and its relationship to the nearby heritage assets would not cause a likely significant effect upon the historic environment sufficient to warrant an EIA.

As a result of this distance and the scale of the proposed development, it is considered that the proposal would not result in any significant impacts in the context of EIA. A planning application would be expected to be supported by appropriate Archaeological and Heritage Assessments as well as Landscape Visual Impact Assessments to assess any impacts on the heritage assets and propose appropriate planting mitigation, etc. Other potential heritage and archaeological impacts could be controlled through planning conditions.

3. Types and characteristics of the potential impact

The likely significant effects of the development on the environment must be considered in relation to criteria set out in paragraphs 1 and 2 above, with regard to the impact of the development on the factors specified in regulation 4(2), taking into account—

- (a) the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected);
- (b) the nature of the impact;
- (c) the transboundary nature of the impact;
- (d) the intensity and complexity of the impact;
- (e) the probability of the impact;
- (f) the expected onset, duration, frequency and reversibility of the impact;
- (g) the cumulation of the impact with the impact of other existing and/or approved development;
- (h) the possibility of effectively reducing the impact.

It is considered that the proposed development would cause wide ranging impacts, both positive and negative impacts, with the former not needing to be mitigated. Other impacts, such as impacts upon the immediate locality, which is not densely populated, would be of such magnitude and nature that they can be reasonably assessed and mitigated, if necessary, through the planning process. These impacts are not deemed to be unduly intense or complex and the probability of the impacts can be determined through supporting information to a planning application.

It is acknowledged that this project together with existing and/or approved development has the potential to result in cumulation of impacts on the immediate area, either during the construction or operational phases. However, should cumulation of impacts occur, these are capable of being considered within a construction management plan and construction environmental management plan which would be assessed by relevant consultees, including HCC Highways as part of the planning application process. Therefore, these impacts would not trigger the need for an Environmental Statement.

Furthermore, given the current national and international renewable energy infrastructure landscape, the scheme is not large in terms of infrastructure project and once operational will require little maintenance. The expected onset, duration, frequency and reversibility of any impact of the project can be adequately understood and managed through the planning process and associated planning conditions.

The benefits from the scheme would have a positive transboundary effect with the energy being stored contributing towards reducing carbon emissions and local renewable energy targets for the lifetime of the development, and most of all assisting the National Grid to manage network problems associated with the intermittency of energy supplied from renewable energy technologies. In addressing whether it would be possible to mitigate against or reduce the impacts, it is considered that an Environmental Statement is not needed to conclude on the evidence gathered and mitigation proposed. In making this determination the cumulation of the impact (having regard to the location, in conjunction with the scale and nature of the development), this has not been identified as having a likely significant effect.

Conclusion

The principle of EIA screening is to determine whether a proposal is likely to have any significant effect on the environment. In evaluating the proposal in accordance with the guidance in Schedule 3 of the 2017 Regulations, the development as described within the submitted Screening Report falls within the description of paragraph 3(a) of Schedule 2 of the EIA Regulations 2017, and exceeds the relevant thresholds in column 2 of the table in that Schedule.

In having regard to the details of the proposed development and to the selection criteria set out in Schedule 3 of the 2017 Regulations, the Local Planning Authority hereby adopts a screening opinion to the effect that the development proposed, in cumulation with other existing development and approved development, is not likely to have significant effects that cannot otherwise be adequately considered through the planning process.

Accordingly, it is the Council's screening opinion, in accordance with Regulations 5 and 6 that the proposed development does not constitute EIA development and an Environmental Statement would not be required to accompany any planning application in accordance with the 2017 Regulations.

Yours sincerely

Alex Robinson

Alex Robinson
Executive Head of Place
Our Ref: GEN/24/00497