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3711 Thorne EIA Screening Request
24th March 2014

**Proposed Solar Farm to be located at Thorne Colliery near Moorends
Request for an Environmental Impact Assessment Screening Opinion – Town and Country
Planning (Environmental Impact Assessment) Regulations 2011**

Dear Mark,

I am writing to request Doncaster Metropolitan Council's (LPA) formal opinion as to whether the proposals described in this letter for a solar farm on up to 12 hectares of land at Thorne Colliery, near Moorends, Doncaster, South Yorkshire DN8 4NE constitute EIA development.

The following information is submitted as part of this Screening Opinion Request, as set out in Regulation 5 of the EIA Regulations:

- a) a plan sufficient to identify the land;
- b) a brief description of the nature and purpose of the development and of its possible effects on the environment; and
- c) such other information or representations as the person making the request may wish to provide or make.

Application Site and Surrounding Area

The Application Site is located to the north-east of the settlement of Thorne and immediately to the east of residential development at Moorends at the former Thorne Colliery. A site location plan is included in drawing 03009D2506-01.

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The site is flat and occupies the former yards and headstocks areas (now removed) of the former Colliery, together with the associated storage yards and spoil heaps. Although a site in former industrial use, the area is classified as 'Countryside' under Doncaster Metropolitan Councils Core Strategy Policy CS3.

There are no International statutory designated sites within the application site. Designated sites within a 10km radius of the proposed development site are considered in detail below, they include;

- Thorne Moor Special Area of Conservation (SAC) – adjacent to the proposed site
- Hatfield Moor SAC – approximately 7.5km, at its nearest point, to the south of the site
- Thorne and Hatfield Moors Special Protection Area (SPA) – adjacent to the east boundary of the site
- Humber Estuary SAC and Ramsar site (also designated as an SPA and notified as a SSSI) – located approximately 7.5km to the northeast of the site

There are no formal landscape designations within the application site. The site is adjacent to an Area of Special Landscape Value (ASLV) under the current Unitary Development Plan, although the emerging Sites and Policies Development Plan Document does not include the ASLV designation.

There are no Scheduled Ancient Monuments (SAMs) on or within a 1km radius of the site and there are no listed buildings within the site.

The Environment Agency's map shows the site is located in Flood Zone 2/3 – as such a Flood Risk Assessment will accompany a planning application.

Proposed Development

A temporary planning permission is being sought for a 27 year period including up to 1 year for construction, 25 years operation and 1 year decommissioning. After the 27 year period the development would be removed and site returned to its current use.

The development comprises the following elements:

- **PV Module Array and Racking System** – PV Arrays consisting of PV Modules (commonly called "solar panels") with typical dimensions of 1m x 1.6m and 50mm thick, arranged on steel or aluminium mounting rack with a maximum height above ground level of 2.5m. Racking will be mounted on concrete ballast foundations which will sit on top of the existing surface. The panels are arranged in rows from east to west and at an angle of around 30° from the horizontal, facing south in order to maximize solar gain. The proposal is a static design with no moving parts.
 - **Embedded Substations** - Embedded substations housing transformers and inverters or other electrical equipment will be located within the PV Module Array. There will be approximately 5 embedded substations in self-contained weatherproof units. The inverters will convert the Direct Current (DC) to Alternating Current (AC) and the transformers will uprate the voltage from a Low Voltage to a Medium or High Voltage as required by the electricity grid connection. Each unit will be up to approximately 12m long by 3m wide and 3m high.
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- **Grid Connection Building** – A substation housing switchgear and metering equipment will be required at the point of connection with the electricity grid. Maximum dimension of the building will be up to approximately 12m long by 6m wide and a maximum height of 4 m.
- **Site Access** – Access to the application site is proposed from the north off Moorends Road onto Goole Road. Access will either utilise an existing gateway and roads.
- • **On site access tracks** – Internal access tracks will be required for construction, maintenance and decommissioning and will utilise existing access tracks.
- **Fencing** – The PV Modules will be secured by green weld mesh security fencing.
- **CCTV and Infra-Red Lighting** - A CCTV security system will be installed, with cameras and infrared lighting supported on posts at regular intervals at the perimeter of each array element.
- **Hardstanding** – up to 5 areas of hardstanding will be needed to allow cranes to set up for offloading and placing components. These areas will consist of compacted stone of variable thickness up to typically 300-500mm, and approximately 12m by 12m square in plan. The construction will ensure these areas are permeable to maintain surface water run off rates.
- **Cabling** – Any on-site cabling will be on the ground within protective cabling trays which will be affixed to the surface. The cabling will then link directly to the on site substation.
- **Pyranometer Mast** - Pyranometers are used to measure irradiation levels on site. This information will be used to verify performance of the installation. The instrumentation consists of a lattice mast approximately up to 3m high. This is the description we will use for planning, but it is more likely that the pyranometer installed will simply affix to the frame work of the installed solar panels.
- **Temporary Construction Compound** – A temporary compound will be required during the construction period for the storage of materials, as well as containing office and welfare facilities. The compound will be surfaced appropriately with compacted stone which will be removed on completion of the construction phase. It is likely we will use the existing hard standing however, additional areas of temporary stone compound may be required.
- **Construction and Decommissioning** – The construction of the solar farm will typically take between 8 and 12 weeks. The solar panels and frames and all associated parts of the development referred to above will be completely removed when the site ceases operation. It is expected that this will take less than 12 weeks. All materials deployed are capable of being recycled and it is expected that an aspiration to recycle or reuse the majority of materials will be achievable.

Initial Environmental appraisal of the proposed development

Initial feasibility work has been undertaken to establish the suitability of the site for development as a solar farm and to identify environmental constraints or sensitivities.

The proposed development Site has been selected from a wider landholding which is identified on the accompanying location plan.

This has included a series of desk-based and on-site surveys and analysis. To ensure all environmental effects are minimised and taken account of, a series of supporting Environmental Reports will be submitted with the planning application. These reports will identify potential environmental implications of the solar farm and the design and management measures proposed.

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A summary of the initial environmental appraisal of the site is presented below. It is considered that all issues associated with the proposed development of the site as a solar farm can be address through normal planning practices.

Ecology

The approach to characterising baseline ecological conditions for the proposed development area has involved consultation, desk study and field survey. The resulting baseline has been used to inform sighting and design of the solar array, with the proposed development area being confined to areas of previously developed land, thereby seeking to minimise any direct impact on adjacent designated sites.

An extended Phase 1 Habitat Survey was undertaken on site on the 29th October 2013. In addition pre-planning consultation has been undertaken with Natural England (NE) through the Discretionary Advice Service (DAS) (ref DAS/112223) to establish an appropriate strategy and programme for further assessment work and management.

A summary of the habitats and notable species across the site is presented below, followed by the proposed scope of and programme for survey work to accompany the planning application.

- **Habitats** - The central part of the development area is characterised by a mosaic of short ephemeral vegetation on artificial mixed substrates, bare ground, hard standing, shallow pools of standing water, small patches of grasses and tall-herbs and scattered immature shrubs and trees. The vegetation is fairly species-rich, but there are no aquatic species, which indicate that the areas of standing water are unlikely to be permanent. At the south end of the development area there is a stand of open birch / willow woodland with stands of fairly species-rich neutral grassland that occupy the gaps between stands of trees and shrubs. The woodland is relatively even aged and where the canopy is closed, the field-layer vegetation is fairly sparse. A less mature, relatively small stand of silver birch dominated woodland is located to the immediate north of an Electricity Sub-station. At the north end of the development area is an area that supports a mosaic of marshy grassland, dense reed-beds and a narrow ditch. Grey willow shrubs are scattered throughout the stand and in places form small, but dense, immature stands. Patches of bare ground are also locally frequent and occur in a mosaic with neutral and marshy grassland.
 - **Notable Plants** - The field survey located two notable species within the site including short-styled field-rose and holme willow *Salix calodendron*. The short-styled field-rose is located in a part of the development area and may be affected by the proposed development. The holme willow is located on the perimeter of the development. With appropriate measures it is likely that the species can be protected during the construction phase of the proposed development.
 - **Great crested newt** - Great crested newt surveys of all of the ditches within the site were carried out by SLR during spring and early summer of 2013, in support of a planning proposal for a potential housing development. No great crested newts were located, SLR (2013). Given the SLR (2013) survey results, the lack of modern results from neighbouring sites and the poor suitability of all the standing water, the presence of great crested newts on the site are not anticipated and no further survey work is considered necessary. This approach has been agreed with NE in the DAS consultation meeting.
 - **Reptiles** – small areas of the site provide suitable habitat for reptiles. Further survey work is proposed for April and May 2014 and will be undertaken in accordance with current guidance.
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However, due to constraints in relation to anti-social behaviour on the site, the survey work will consist of a walkover survey and checks of any naturally occurring refugia. This approach has been agreed with NE as part of the DAS consultation.

- **Invertebrates** - The desk study returned records for 22 Species of Principal Importance and records of 20 Doncaster LBAP Priority Species. Three of these species including single records for wall Lasiommata megera butterfly, and cinnabar Tyria jacobaeae and shaded broad-bar Scotopteryx chenopodiata moths were recorded within the site. All the other records were located outside of the site, the majority being associated with Thorne Moors SSSI. Similarly the majority of notable species records provided are associated with Thorne Moors SSSI, but three records are located within the wider site boundary and include single records of the beetle Enochus bicolor (Nationally Scarce); adonis ladybird Hippodamia variegata (Notable B) and two records of wall butterfly (Near Threatened). To determine the potential impacts and develop suitable mitigation methods, a scoping invertebrates survey will be undertaken during summer 2014. In addition, the surveys will inform the future management of the areas beyond the development site with the aim of enhancing the habitats and populations of invertebrates of these areas for foraging nightjar.
- **Harvest Mouse** - No evidence of harvest mouse nests was located during the survey work of the development area during winter 2013/2014. No further survey work is considered necessary.
- **Nesting birds** - The development area supports a limited range of habitats for nesting birds. It is possible that the marshy grassland areas to the north could be used by a range of species as could the small area of woodland. The winter bird survey did not reveal the presence of over-wintering wildfowl, although snipe were recorded within the reed area. It is considered unlikely that the development area is used by breeding nightjar, due to a lack of suitable nesting habitat. As agreed with NE, no further survey work in relation to nesting birds is considered necessary.

Reporting - The methods and results of the detailed survey work (winter birds, harvest mouse, reptiles, invertebrates and botanical surveys) will be collated into a single report that will provide analysis and interpretation of the results. An assessment of birds, harvest mouse, plants and invertebrates and the overall ecological interest of the development site will be made. The report would identify the likely impacts of the proposed development, potential mitigation measures and opportunities, which could arise through the proposed development of the site, with reference to the National Planning Policy Framework and legislation.

Habitats Regulations Assessment (HRA) - It is proposed that an HRA screening exercise be undertaken to determine whether the development is likely to have a significant effect on the qualifying feature of the Thorne and Hatfield Moors SPA, i.e. nightjar. The screening exercise will also consider whether there are likely to be any hydrological impacts on the Thorne Moor SAC.

Due to the availability of detailed and up to date information with regards to nightjar abundance and distribution within Thorne Moor SPA, and survey work carried out at Thorne Colliery during 2013 with regards to nightjar and breeding birds, it is considered that there is sufficient information to complete an HRA the SPA without further nightjar survey work. This approach was verified with Natural England during the DAS consultation meeting to be acceptable. It is considered that the site could be used by small number of feeding nightjar, but that it does not provide suitable breeding habitat, this position has been verified with Natural England.

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Biodiversity enhancements - It has been identified that some of the areas within the applicants wider landholding are within Thorne & Hatfield Moor SPA the Thorne Moor SAC and the Thorne, Crowle & Goole Moors SSSI. It has also been identified with NE that parts of these areas are currently undermanaged and are scrubbing over. The applicants are happy to include as part of their proposals improved management of these areas which are likely to result in biodiversity benefits, particularly for the invertebrates fauna which will, in turn provide an improved food resource for nightjar.

In addition, management of the adjacent Thorne Colliery Local Wildlife Site to promote its biodiversity interest and in particular to provide a suitable habitat for nightjar could form part of the development proposals.

An ecological management plan will be prepared to set out the detailed management of these areas. The plan will be produced in consultation with Natural England and the LPA.

It is considered that habitat enhancement through the improved habitat management of the areas beyond the development area is likely to result in a net benefit for nightjar.

In summary; it is considered unlikely that adverse impacts on ecology will be occasioned, and any impacts would not be significant in the context of the EIA Regulations.

Landscape and visual

An initial appraisal of the landscape and visual effects of the proposed solar farm has been undertaken based on site visits and a Zone of Theoretical Visibility (ZTV) mapping study and site visit to verify the results. Please see 3711_SK01, and supporting note attached.

The ZTV illustrates that there would be limited potential visibility of the proposed solar farm from the north and west of the site due to existing vegetation, particularly along the northern boundary of the site and along the Hull to Doncaster/Sheffield railway line. Vegetation within Thorne Moors would also limit visibility to the east and south east. Hedgerows to the south of the site would also restrict visibility to a greater extent than suggested by the ZTV. The site would be visible from locations on the edge of Moorends and to a lesser extent Thorne, with views filtered by intervening vegetation. There would also be visibility of the proposed solar panels from public footpaths and the Peatland Way, which pass in close proximity to the site, and from some locations within Thorne Moors.

The site is adjacent to an Area of Special Landscape Value (ASLV) under the current Unitary Development Plan, although the emerging Sites and Policies Development Plan Document does not include the ASLV designation.

The site is not within a 'Sensitive Area' as per the EIA Regulations. Therefore, the potential impacts are not considered to be 'significant' in the light of the EIA Regulations 2011. Overall, it can be concluded from the initial professional assessment of landscape and visual issues that there are no major constraints to the development of a solar farm of the type proposed at Thorne.

A Landscape and Visual Impact Assessment (LVIA) will be prepared to accompany the planning application and will thoroughly consider the effects of the development and measures, such as supplemental planting and screening, to mitigate potential impacts.

Heritage and Archaeology

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A Desk Based Heritage Assessment (DBA) has been carried out in order to inform the development proposals with the involvement of a heritage specialist. The DBA has identified that there are no national heritage designations within the site itself and as such there will not be any physical harm to designated heritage assets.

There are no Scheduled Ancient Monuments (SAMs) within the 1km radius of the site. The closest SAMs to the site are:

- Peel Motte and Bailey Castle at 3km to the south west. The Norman motte survives to a height of over 8m, but that appears to be from the base of its moat. It does not appear that the proposed solar development would have any effect on this monument.
- a medieval moated site is recorded at Warren Hall some 6km to the west of the site.

There are no listed buildings within the site but those in the vicinity of the site include a late 18th century listed (Grade II) building at Micklethwaite Farmhouse 0.5km to the west of the site. There are also a number of listed buildings at Grade II at Thorne some 3km to the southwest including The Church of St Nicholas which is a Grade 1 listed asset. The majority of historic assets are located in an urban environment at some distance from the site, it is considered unlikely that the proposed development would have any impact on setting.

No significant archaeology is reported from within the site or surrounding study area. Due to the sites former use, and the fact that the site is largely contained within the previously developed area of the colliery, it is anticipated that the site would be of limited archaeological value. The applicant would be happy to discuss and verify this position with the Local Authority.

Hydrology

It has been established that the site is located in Flood Zone 2/3; as such the application will be accompanied by a Flood Risk Assessment (FRA). The site is also located adjacent to Thorne Moor Special Area of Conservation (SAC), in order to establish the potential impact of the development upon the hydrological integrity of Thorne Moors SAC a DBA and site visit have been undertaken by a qualified hydrologist in order to establish hydrological conditions of the site. Initial findings are summarised below.

- Several drainage ditches exist along the northern site boundary along with a considerable mining spoil heap – these features disconnect the site from the SAC in terms of surface water flow and provide a natural form of protection against flooding from surface water
- Borehole logs at the Colliery site show clays down to approximately 7 m below ground level, which are unlikely to hold near-surface water. As such, construction activities and the operation of the proposed development are unlikely to influence groundwater / near-surface water quantity or quality at the adjacent SAC
- Large sections of the development site have areas of existing hardstanding in the form of solid concrete or crushed stone hardcore underlain by grey clays – as there are existing impermeable areas onsite, this will limit the requirement for SUDS techniques to be implemented. There is also an existing storm-water drainage network under the site which will further reduce the requirement for SUDS

Formal consultation with Natural England has confirmed that due to the nature of the proposals and construction method, it would be unlikely that the proposed development would have any impact upon the qualifying features of the SAC.

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A Hydrology Statement and Flood Risk Assessment will accompany the planning application. It is not considered that the proposals will have any significant impact on the hydrology interests of the site.

Transport and Access

The majority of traffic generated by the development will be during the construction and decommissioning phases of the development. The precise routing of construction traffic has not yet been finalised. However, it is likely to enter the along Goole Road via Moorends Road, avoiding the residential areas at Moorends (as per the existing access arrangements for the Tween Bridge Wind Farm windfarm development. Construction is likely to last between 6-12 weeks.

The only traffic generated during the operational phase of the development would be occasional visits from engineers and contractors for site maintenance. Therefore, the proposed development will not result in any prolonged increase in traffic on the local road network. A construction traffic management plan will be prepared detailing access points, routes, traffic volumes and any necessary mitigation.

Other potential effects

- **Air Quality** - No hazardous, toxic or noxious substances will be emitted as a result of the operation of the solar farm.
- **Lighting** – there will be no permanent lighting of the site. Lighting will only be required during maintenance purposes and is likely to be operated manually.
- **Noise and Vibration** - Once installed the solar panels will not generate any noise or vibrations. The only noise arising from the development will be associated with the inverters and transformers which will be low level located away from sensitive receptors.
- **Climate Change** - The generation of renewable energy will have a positive effect on climate change.
- **Socio-economic circumstances** (temporary employment) and landscape and visual conditions (building materials and construction vehicles) are also considered to be typical effects which, given the temporary duration of the construction period, are not significant.
- **Cumulative Effects** – existing and committed developments (in the form of consented planning applications) will be considered in the baseline assessment for the LVIA and other relevant documents. The applicant would be happy to discuss potential sites for inclusion for cumulative assessment at formal pre-application discussions.

Summary

Having reviewed the nature of the proposals and their potential environmental impact it is considered that any of the effects of the proposed development are localised and can be mitigated through the normal planning process, as such it is not considered that an EIA is required.

A consideration of the EIA regulations has been conducted to verify this interpretation and is set out below.

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EIA Regulations

The EIA Regulations 2011 define 'EIA Development' in Regulation 2(1) as either:

- a) Schedule 1 development; or
- b) Schedule 2 development likely to have significant effects on the environment by virtue of factors such as its nature, size or location.

The proposed development does not fall within 'Schedule 1' of the EIA Regulations 2011 where an EIA is mandatory.

The relevant part of Schedule 2 is Paragraph 3 (a) "Energy Industry" which includes "Industrial installations for the production of electricity, steam and hot water", where the area of the development exceeds 0.5 hectare. Schedule 2 developments do not however automatically require EIA.

The application site is not located within a defined sensitive area (a HRA screening exercise will be undertaken to establish the effect of the proposals upon the adjacent SAC and SPA). However, the proposals will exceed the 0.5 hectare threshold for consideration under the EIA Regulations 2011.

The National Planning Practice Guidance (NPPG) provides advice on interpreting the EIA Regulations, and provides further detail on the selection criteria which should be taken into account in determining whether a development proposal can be classified as EIA development. The NPPG states that when screening Schedule 2 projects, the local planning authority must take account of the selection criteria in Schedule 3 of the EIA Regulations.

Schedule 3 of the Regulations sets out the selection criteria for screening Schedule 2 developments. The characteristics and location of the development along with the characteristics of the potential impacts are key determinants as to whether the proposed development constitutes an EIA development. A brief appraisal of Schedule 3 is provided below:

Characteristics of Development

Size of development

The proposed development area will cover approximately 12 hectares of land. The maximum height of the solar panels will not exceed 3 metres, which allows for setting some of the panels up higher if the Flood Risk Assessment requires, but the final design is likely to be for up to 2.5m across a majority of the site.

The initial landscape and visual appraisal has shown that a solar farm of this size is well suited to the landscape, which is flat and mainly contained within previously development land. The site survey has indicated that the potential visibility of the development will be limited, and the effect of vegetation and other features significantly restricts views to the Site.

Cumulation with other development

The development will only be undertaken in conjunction with ancillary development of a minor scale.

As part of the LVIA process a cumulative impact assessment will be undertaken, sites for cumulative assessment will be identified with the LPA.

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Use of natural resources

The only natural resources used in the operation of the proposed development will be sunlight.

Production of waste

The proposed development will not produce any waste apart from a limited amount during the construction period. Removal of waste will be sustainably managed.

Pollution and nuisances

The solar farm will have a very limited noise impact from inverter houses, as described above, but this is unlikely to be perceptible to sensitive receptors above background noise levels and will not occur at night.

The solar farm will not result in any harmful pollutants or odours. During construction there will be some additional emissions from delivery and site vehicles but will be relatively minor and short term in nature.

Noise and disturbance will occur during the construction period but this is unlikely to be adverse and will be short term in nature.

Some nuisance in terms of traffic may result during the construction but this will be short term in nature and mainly restricted to A roads. A Construction Traffic Management Plan will minimise any impacts.

Risk of accidents

There would be a low risk of accidents during construction given the nature of the development.

Location of Development

Existing land use

The site is a former Colliery. However, it is classified as 'Open Countryside' in the adopted Core Strategy.

Relative abundance, quality, and regenerative capacity of natural resources in the area

The only natural resource used will be sunlight

Absorption capacity of the natural environment

The initial landscape and visual appraisal has shown that a solar farm of this size can be absorbed well into the landscape (see *size of development* above).

The Site is located within flood zones 2/3. Initial appraisal and site survey work has identified that the hydrological interests of the site will not be adversely affected by the proposed development.

The impact of the proposals upon habitats and species has been discussed with Natural England and are considered to be low; an HRA screening assessment of the impact of the proposals on the qualifying features of the SAC and SPA will be prepared to accompany the application.

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Characteristics of Potential Impact

Extent of impacts

The impact of the proposed development will be limited beyond the site boundary. Some minimal impacts might be experienced on some landscape and visual receptors further afield. Any impacts are reduced by the topography and intervening vegetation.

Transfrontier impacts

The proposed development will not have a national or international impact.

Magnitude and complexity

The magnitude of effect is considered to be low and non-complex.

Probability of impacts

It is considered that there is a very limited chance that the proposed development will have a significant impact.

Duration, frequency and reversibility of impacts

The effects during the operational phase of the development will be long term (25 years) but of a temporary nature and fully reversible at the end of the developments operational life.

Conclusions

It is clear that the proposals for a solar farm do not constitute EIA development when evaluated against the criteria set out above. The proposed development is local in nature and will not have complex or hazardous environmental effects. The Application Site not within an environmentally sensitive or vulnerable location.

All local sensitivities can be addressed through the normal planning process and mitigated through scheme design and implementation of management strategies, which in some instances provide the opportunity to provide improved habitats for invertebrates and nightjar.

In accordance with the EIA Regulations 2011, the proposed development is not considered to be EIA Development.

We would be grateful if you could confirm whether or not the proposed development constitutes an EIA Development, so that preparation and submission of the planning application can proceed.

If you would like to discuss any part of this letter, please do not hesitate to contact me.

Yours sincerely



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