7000Acres

7000Acres Response to the Cottam Solar Project Ltd Application – National Policy Statements and Application of Planning requirements

Deadline 1 Submission – October 2023

Executive Summary

7000Acres is concerned that the Applicant has not provided sufficient explanation for their conclusions and that some of their supporting evidence is flawed.

There are no National Policy Statements that support a solar industrial complex of this size. We recommend that the ExA give considerable weight to the National Planning Policy Framework and the Skidmore Review, especially the elements concerning local health and wellbeing. These explicitly address the need for local consultation and welfare to be central to the planning process.

Cumulative impact. The Applicant has failed to take due account of the cumulative impact of the four NSIPs in the region.

Alternative locations. The Applicant has made this application based on where it can obtain a large area of land that meets its business case. It has then reverse engineered its EIA to fit the available land.

Carbon assessment. The Applicant has not provided a detailed breakdown of their calculations. Furthermore, some of the descriptions do not explain how they arrived at their conclusions and why some assumptions were applied.

Battery Energy Storage System (BESS). The Applicant has provided no evidence why a BESS of this size is required, why its capacity should be uncapped and why it needs to trade energy with the National Grid. 7000Acres believes that the BESS is an "*additional revenue for the applicant, in order to cross-subsidise the cost of the principal development".*

Biodiversity. There is no clear evidence that utility scale solar farms increase biodiversity. The Applicant has not clearly demonstrated they meet the requirements of the Environment Act 2021.

Use of a Rochdale Envelope. The Applicant's application of a Rochdale Envelope has resulted in insufficient information being made available to interested parties in a timely manner.

Timescale. The 40+ year period of the scheme is not "temporary use" of the valuable farmland.

Contents

1. Introduction

7000Acres represents a large number of local residents concerned about the impact of the Cottam industrial solar NSIP and three other solar NSIPs in the locality. This document identifies relevant issues with the Planning Act 2008 (PA2008), and associated regulations, and how the Applicant has failed to provide evidence to support their Application.

2. Policy

2.1 National Policy Statements EN-1, EN-3, Draft EN-1 and Draft EN-3

This Application is for an energy generating station. The only reference to solar generation in EN-1 and EN-3 is a statement in EN-1 section 3.3.11 that states:

"However, some renewable sources (such as wind, solar and tidal) are intermittent and cannot be adjusted to meet demand."

The lack of NPS specifically for solar development is agreed by the Applicant in their ES Appendix 5.1 paragraph 2.2.13. National Policy Statements draft EN-1 and EN-3 do not have effect but do now cover solar power generation. Draft EN-3 does identify a typical solar facility:

"A typical 50MW solar farm will consist of around 100,000 to 150,000 panels and cover between 125 to 200 acres, although this can vary significantly depending on the site and is also expected to change over time as the technology continues to evolve to become more efficient."

The size of the site changing as technology evolves implies that the site should become smaller, for the same generating capacity, as solar PV panels become more efficient. There is no support for a site ten times the example given.

There are no National Policy Statements in effect that explicitly address an industrial solar site of this size. Furthermore, there is still no reference to battery storage in National Policy Statements.

2.2 National Planning Policy Framework

The National Planning Policy Framework was updated on 5 September 2023. It is relevant to this Application as it addresses sustainable development in a holistic manner. It states three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways.

1. *"An economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure."*

The key element is the "land of the right types", so that solar is installed on rooftops and brownfield sites, whilst productive farmland can be used for food production, carbon sequestration and the production of biofuels.

2. *"A social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being;"*

As demonstrated in the submissions by the County and District Councils, as well as numerous Interested Parties, the Cottam Solar industrial complex will have a devastating impact on the local population's wellbeing. The outcome of this scheme will have an exponential impact on health and well-being when the cumulative influence of the other three solar industrial schemes is fully considered.

3. *"An environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."*

This requires "*effective use of land…and using natural resources prudently*". Covering thousands of acres of productive farmland in solar panels and batteries is not productive use of land. The Cottam Solar application does not meet any of these 3 objectives.

2.3 Skidmore Review

This approach, where communities' wellbeing is central to the planning guidance is consistent with the Skidmore Review. The Skidmore Review was commissioned and published by the Government and as such it should be taken as *de facto* Government thinking and policy. Skidmore calls for a "*rooftop revolution*" for solar power but does not make a similar call for ground mounted solar panels. Skidmore repeatedly makes the case that the local communities must be at the centre of the move to Net Zero, for example:

"*726. Now that our national pathway to net zero has been established, we need a new relationship between central and local government to enable effective local delivery. Local authorities will be a key delivery partner, whatever the specifics of the strategy we take on decarbonisation and growth. The sooner we address this, the sooner we will see the economic and social benefits of a more place-based approach.*
727. The importance of this relationship to our net zero pathway cannot be overstated. 30% of the greenhouse gas emissions reductions needed to deliver the Net Zero Strategy rely on local authority involvement, while 82% of emissions are within local authorities' scope of influence.
728. We need to allow places to tailor their net zero approach to their own strengths and needs, informed by the kind of extensive local engagement that central government cannot undertake. We also need to increase local accountability and responsibility for certain aspects of net zero delivery.
729. To do so, we need a reformed relationship between central and local government and a planning system that is fully aligned with net zero."

The NSIP process is designed specifically to look beyond the concerns of the immediate area, and therefore acts in opposition to the specific recommendations of

the National Planning Policy Framework and Skidmore Review, both of which give weight to local needs and requirements.

The National Planning Policy Framework states that it "*does not contain specific policies for nationally significant infrastructure projects".* Even though it does not contain specific policies, it is reasonable to infer that the general principles should be followed. If not, the lack of specific solar policies in EN-1 and EN-3 should also exclude them in a similar manner.

2.4 Battery Energy Storage Scheme (BESS)

BESS of all sizes are excluded from the NSIP Regulations when they are stand-alone applications. Instead BESS applications are covered by The Infrastructure Planning (Electricity Storage Facilities) Order 2020 and determined through the Town and Country Planning Act by LPAs. The Cottam BESS is likely to be one of the largest storage facilities of its type in Europe. There is nothing in NPS, or draft NPS that support the installation of a BESS of this size in a rural location.

2.5 Multiple Solar NSIPs in Lincolnshire

The lack of central guidance or policy on industrial scale solar projects has led to a large number of NSIP applications in Lincolnshire as a whole, and West Lindsay in particular. The Transmission Entry Capacity (TEC) Register[1] shows that nationwide there are a total of 131 GW of solar schemes registered with the National Grid. This is nearly twice the 70GW generation capacity sought by the Government and takes no account of rooftop solar. So, if the Cottam Application was to be refused it would have no impact on the Government's solar target as it is already over-subscribed.

The NSIP schemes registered for grid connections on the TEC Register, show 11 registered for connections to the Cottam, West Burton and High Marnham power stations. There are 35 registered in Lincolnshire as a whole. The 11 schemes in the

[1] https://data.nationalgrideso.com/connection-registers/transmission-entry-capacity-tec-register

Gainsborough area would cover circa 23,000 acres, with the 35 Lincolnshire schemes covering circa 71,866 acres of productive farmland.

So, clearly there is no central control or clear policy, with Lincolnshire becoming a solar Klondike for any developer, irrespective of local requirements and national need.

2.6 Gate Burton NSIP

The Gate Burton Rule 6 Letter stated *"The Applicant has submitted that no designated National Policy Statements apply to this Examination and to decision-making relating to this application"*.

No NPS are applicable therefore the Application is being assessed under Section 105 of the Planning Act 2008. For consistency with a similar scheme only 1km away from Cottam, 7000Acres believes that the Cottam Application should also be examined under Section 105 of the Planning Act 2008.

2.7 Summary

7000Acres believes that the ExA should give considerable weight to the National Planning Policy Framework and the Skidmore Review, especially the elements concerning local health and wellbeing. These explicitly address the need for local consultation and welfare to be central to the planning process. There is no clear national policy on ground mounted solar (unlike roof mounted solar in Skidmore), otherwise the solar grid connections would not be oversubscribed by twice the target, without even taking account of the considerable growth in rooftop solar.

The NPS do not support a solar industrial complex of the size proposed for Cottam: this view is supported by the Gate Burton NSIP Application being assessed under Section 105 of the Planning Act 2008. Section 105 requires the Secretary of State to take due account of Local Impact Reports.

3. Cumulative Assessment

3.1 Regulations

The Applicant is required to take into account the cumulative impact of their application and any other relevant schemes. EN-1 Paragraph 4.1.4 states:

"*In this context, the Secretary of State should take into account environmental, social and economic benefits and adverse impacts, at national, regional and local levels."*

Paragraph 4.2.6 goes on to state:

"*the Secretary of State should consider how the "accumulation of, and interrelationship between effects might affect the environment, economy or community as a whole, even though they may be acceptable when considered on an individual basis with mitigation measures in place."*

Advice Notice Seventeen provides additional guidance on a Cumulative Effects Assessment (CEA).

3.2 Scope of Assessment

The Applicant's Environmental Statement Landscape and Visual Impact Assessment Appendix 8.1.3: Cumulative Methodology identifies the types of cumulative effect. Their Environmental Statement Chapter 8: Landscape and Visual Impact Assessment Paragraph 8.10 states the cumulative effects identified by the Applicant. The Applicant has chosen to take account of cumulative effects within 5km of Cottam. This is contested, as due to the size and regional nature of the multiple solar schemes 5 km is insufficient. The list of adjacent solar schemes shown in paragraph 8.10.6 should be updated to include the One Earth Solar[2] scheme, which is a NSIP, straddling the River Trent just upstream of Cottam Power Station.

[2] http://oneearthsolarfarm.co.uk/proposals/

The Applicant has identified cumulative sites and set them out in individual receptor sheets. However, these only show where two or more schemes can be viewed from the same point. The assessment does not take account of viewing schemes sequentially when passing through the area. Neither does it take account of the wholesale change to the landscape in the region. The opinion of 7000Acres is supported by the Lincolnshire County Council Landscape and Visual Review that states (paragraph 4.15):

"This landscape change also has the potential to affect wider landscape character, at a regional scale, by replacing large areas of agricultural or rural land with solar development, affecting the current openness and agricultural character that are identified as key defining extensive fencing and CCTV will be out of character with the wider rural area."

The Applicant has generally dismissed cumulative effects and bizarrely makes claims that some elements of the scheme will actually have a beneficial effect on the landscape. For example Table 8.69- Year 15 Beneficial Moderate Significant:

"*The larger field systems are a key feature, especially where they form a geometric and regular pattern with thickly hedged fields. Linear belts of scattered trees to the south and east of the Cottam 1 Site will help to increase the level of tree cover locally and visually and physically link to existing woodlands such as Thorpe Wood, Cammerinham Low Covert and Brattleby Gorse, through enhanced hedgerows. The strong rectilinear field pattern is a key feature to be enhanced with new hedge planting where appropriate. Where hedgerows have been previously managed to create low, neat field boundaries, these are to be allowed to grow out and managed to a height of 5m with the addition of irregularly spaced hedgerow trees. This will have the effect of varying the land use locally whilst open views across the landscape, particularly from the east to the west still available where arable cultivation is retained."*

This conclusion takes no account of many of the current open views being screened by 5m high hedges which are not a feature of this area. Neither does it take account of open fields being covered in an industrial landscape of 4.5m high solar panels, batteries, security fencing, lighting and associated structures.

3.3 Summary

The assessment of cumulative impact is not logical or balanced. It does not take account of the generational change of land use from the current rural farming landscape to a solar industrial landscape. Our view is supported by the Lincolnshire County Council Landscape and Visual Review that states (paragraph 6.5):

"We have judged that the cumulative change to the landscape will be considerable and significant, and the combination of two or more sites has the potential to change the local landscape character at a scale that would be of more than local significance. The cumulative impact of the four adjacent NSIP scale solar schemes has the potential to affect the landscape at a regional scale through predominantly a change in land use: from arable to solar, creating what may be perceived as an 'energy landscape' as opposed to rural or agricultural one at present."

4. Alternative Locations

4.1 Regulations

In ES Appendix 5.1, the Applicant states (paragraph 2.1.3): "*There is currently no NPS specifically for solar development"*.

In Appendix 5.1 paragraph 2.1.10 the Applicant sets out their logic for selecting the Cottam site. It is clear that the primary driver was the 600MW connection to Cottam Power Station and then finding sufficient land (1300 ha) to generate that capacity.

Paragraph 2 of Schedule 4 of the Environmental Impact Assessment (EIA) Regulations requires:

"A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects".

The Applicant has failed to follow paragraph 2 of Schedule 4 of the EIA Regulations. Although not applicable, draft EN-3 paragraph 2.48.15 provides some useful guidance:

"It is recognised that at this scale, it is likely that applicants' developments may use some agricultural land, however applicants should explain their choice of site, noting the preference for development to be on brownfield and non-agricultural land."

Again, the Applicant has failed to explain their selection of the land around Cottam. For example, the Applicant has not explained why certain elements of their scheme, such as the BESS, could not be co-located with their grid connection at Cottam Power Station. Cottam Power Station is being sold by EDF and the brownfield site is available for certain types of redevelopment. 7000Acres has an email from a representative of EDF stating that the Applicant has not even requested details of the available land at the Power Station; this email can be produced on request. The location chosen by the Applicant is not part of a national plan; it was selected without Local Planning Authority involvement, without community involvement and has no regard to valued landscape.

4.2 Summary

The Applicant has made this application based on where it can obtain a grid connection and large areas of land that meets its business case. It has then reverse engineered its EIA to fit the available land.

5. Carbon Assessment

5.1 5.1 Regulations

If the ExA choses to take account of the general principles in Draft EN-1, note can then be taken of Draft EN-1 Paragraph 5.3.4. That Paragraph requires the Applicant to produce a carbon assessment.

5.2 Applicant's Response

The Applicant's Environmental Statement Chapter 7: Climate Change includes their assessment of GHG emissions.

5.2.1 Baseline

Paragraph 7.6.3 assumes the current site has zero baseline emissions, it also assumes a zero baseline if the scheme is not constructed. This takes no account of initiatives such as the Country Stewardship scheme and the Woodland Management Plan that will increase habitat and carbon sequestration in farming land. Neither does the Applicant take account of growing biofuels on the site, which reduce GHG emissions. Finally, no account is taken of the GHG emissions generated by importing the crops that are currently grown in this area if the scheme is constructed.

5.2.2 Transport Assumptions

Table 7.21 assumes that 50% of items required will be shipped from China and 50% from Europe. However, China is now the major supplier of both solar panels and batteries for a BESS. Therefore, this 50:50 ratio is likely to be incorrect and an underestimation of the GHG emissions during transport to the site. The Applicant should provide greater clarity on the sources of their equipment and why the 50:50 assumption is valid.

5.2.3 Maintenance and Replacement of Units

Solar Panels

Paragraph 7.8.53 assumes that 0.04% of panels will need replacing every year. Therefore, only 1.6% of the panels will need replacing over the 40-year lifespan of the scheme. As the Applicant has chosen to apply a Rochdale Envelope, a worst case assumption on panel replacement should be applied. Current solar PV panels have a life of less than 35 years. Therefore, the Applicant's assessment should consider the GHG emissions caused by 100% replacement.

Batteries

Paragraph 7.2.7 assumes the batteries will be replaced once over the 40-year lifespan of the scheme. Assuming the batteries are used for energy trading with National Grid, they will be subject to higher charging cycles than if used merely to store solar generated power. Therefore, current technology will not last for 20 years. As the Applicant has chosen to apply a Rochdale Envelope, a worst case assumption on battery replacement should be applied. It should be assumed that batteries will require replacing at least every 10 years.

Sensitivity Analysis

It would be helpful for the Applicant to produce a sensitivity analysis, showing the variation in GHG emissions with varying replacement periods.

5.2.4 Decommissioning

The Applicant assumes the decommissioning emissions will be similar to the construction phase. This takes no account of recycling PV panels and electrical equipment. Also it takes no account of returning the land to its original condition. It is probable that this is an underestimate of the true GHG emissions during decommissioning.

5.3 Summary

The Applicant has produced a very high-level summary of the GHG emissions generated by their scheme. However, no meaningful detail is provided on how the figures were estimated. It would be helpful for the Applicant to provide their detailed calculations so that they can be verified independently. For example, a spreadsheet showing their assumptions and calculations would be helpful to all interested parties.

Some of the Applicants assumptions are questionable, such as the replacement timings of solar panels and batteries. The total GHG emissions will be sensitive to the replacement period of major components, so the Applicant should reflect this in their assessment.

It is probable that decommissioning, especially recycling all equipment and returning the land to productive farmland, will result in higher GHG emissions than stated by the Applicant.

6. 500 MWh (uncapped) Battery Energy Storage System (BESS)

EN-1, EN-3 and EN-5, and their drafts, do not consider BESS. BESS are covered by the Infrastructure Planning (Electricity Storage Facilities) Order 2020, which are determined through the Town and Country Planning Act by LPAs. The PA2008, Guidance on Associated Development Applications for Major Infrastructure Projects is clear on the requirements for what constitutes Associated Development. There is currently insufficient evidence for the ExA to conclude that an energy trading BESS would be Associated Development or an aim in itself.

As the Applicant has adopted a Rochdale Envelope, they have made limited information available about the BESS. Amongst other things the following details are unclear:

- Any indications as to the total power of the BESS (rated in megawatts)
- Any indications as to the storage capacity and duration of storage (rated in megawatt hours)

- Sufficient evidence regarding the network and how the PV cells will be connected to the BESS
- Any explanation over the energy balancing role of the BESS and energy import from the National Grid. These features are discussed in publicity material but not in the draft DCO, so will they be a feature of the BESS?

7000Acres believes that these questions must be answered before the Examining Authority can conclude if the BESS is Associated Development. Applying the principle of a Rochdale Envelope, the "reasonable worst case" assessment is currently that the BESS is not Associated Development, as it will be capable of trading power (energy arbitrage) with the National Grid at night and winter months when the PV cells are not generating power. It will be an additional source of income. To trade energy with the National Grid, additional equipment and monitoring systems will be required. As the Consent will be for operating a "generating station", revenue operations when the scheme is not capable of generating power should be viewed as a separate system. The PA (2008) Associated Development Guidance states in paragraph 5 (iii) that:

"Developments should not be treated as associated development if it is only necessary as a source of additional revenue for the applicant, in order to cross-subsidise the cost of the principal development".

PA (2008) Associated Development Guidance Paragraph 6 states:

"It is expected that associated development will, in most cases, be typical of development brought forward alongside the relevant type of principal development or of a kind that is usually necessary to support a particular type of project, for example (where consistent with the core principles above), a grid connection for a commercial power station."

For energy trading, additional equipment such as monitoring systems will be required. That is only for generating additional revenue and so cannot be viewed as Associated Development.

Annex A and B to the Guidance provides examples of general types of associated development and specific examples for onshore generating stations. At no point is “battery” given as an example.

6.1 Summary

It is clear that there is no National Policy Statement or Guidance to PA2008 that allows a 500+MWh BESS to be installed as part of a solar NSIP. The Applicant has provided no evidence why a BESS of this size is required, why its capacity should be uncapped and why it needs to trade energy with the National Grid. 7000Acres believes that the BESS is an “*additional revenue for the applicant, in order to cross-subsidise the cost of the principal development”.* As the BESS is aimed at cross-subsidising the solar project, and so not associated development, it should be heard under a separate application in accordance with the Infrastructure Planning (Electricity Storage Facilities) Order 2020, i.e. determined through the Town and Country Planning Act by the LPA.

7. Ethical Supply Chain

The Applicant has stated that they will source their solar PV panels from China. China is also a primary source of BESS batteries. There is strong evidence that a substantial part of the solar PV panel supply chain in China, from the extraction of polysilicon to the production of panels, uses slave labour (Helena Kennedy Centre for International Justice: Sheffield Hallam University, 2021). The Applicant should verify their supply chain is free from all slave labour.

8. Biodiversity

8.1 Conflicting Evidence

Natural England (Natural England, 2016) and the Planning Inspectorate (Alder, n.d.) both identify that there is limited evidence to support claims that utility solar increases biodiversity. Natural England state:

"Due to the spatial requirements of utility scale solar PV developments, the physical landscape of UK habitats will be affected by the implementation of these technologies necessitating an understanding of the potential effects that solar PV may have on biodiversity. Understanding requires evidence which is traditionally gathered through robust scientific investigation and peer reviewed publication. No experimental studies specifically designed to investigate the in-situ ecological impacts of solar PV developments were found in the peer reviewed literature. Considering that cumulative installed global PV capacity is projected to reach between 450 GW and 880 GW by 2030, up from 67 GW in 2011 (Gan and Li, 2015), this lack of ecological evidence is heavily under representative of the interest and investment in solar PV deployment."

Furthermore, Adler concludes that:
"In the literature, concerns have been raised that solar PV developments have the potential to negatively impact a broad range of taxa including birds, bats, mammals, insects and plants. In light of this, it is highly recommended that research is undertaken into the ecological impacts of solar PV arrays across a broad range of taxa at multiple geographical scales".

8.2 Summary

There is no clear evidence that utility scale solar farms do increase biodiversity. The Applicant has not clearly demonstrated they meet the requirements of the Environment Act 2021.

9. Rochdale Envelope

During public open days IGP quoted the "Rochdale Envelope" to several residents as a reason why detailed information did not need to be provided at that stage. It resulted in members of the public being denied information. However, Advice Notice Nine: Rochdale Envelope paragraph 3.4 states:

"There is opportunity within the statutory Pre-application procedure for applicants to determine the most appropriate consultation programme for their needs and to time

the consultation to appropriate stages in the evolution of the Proposed Development. ***However, the consultation must be undertaken on issues that have been clearly identified and on a Proposed Development that is as detailed as possible. The bodies consulted need to be able to understand the proposals. The details of the Proposed Development should therefore be described as clearly and simply as possible.*** *Obviously fewer options and variations within a project description make it easier to understand, especially by those less familiar with the PA2008 process."*

Even now at the Examination Stage, the Applicant still retains information on key topics, such as the BESS, that is required to assess this project. During a Public Consultation the Gunning Principles should be applied. In this case it is clear that two Principles have been ignored: firstly, there has been insufficient information provided to give "*intelligent consideration*" of the project; secondly, there has been inadequate time for consideration and response due to the enormity of this and the other three adjacent solar projects.

10. Temporary Use of Farmland

The Applicant's draft DCO seeks approval to use the land for 40 years, although this might be extended. 7000Acres disagrees that 40 years is temporary use of the land. Our concern is supported by the Planning Inspector for the Lullington solar farm (The Planning Inspectorate, 2023):

"Whilst the 40-year period may allow for the restoration of the soil structure and reduce the problems associated with nitrates usage, it appears to me, as it has done to other Inspectors at appeals cited by the Council, that 40 years would indeed constitute a generational change."

7000Acres agrees that changing the use of the land for 40 years would not be "*temporary*" but *"generational".*

11. Bibliography

Alder, P. M., n.d. *BIODIVERSITY AND SOLAR FARMS.* [Online]
Available at: https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010118/EN010118-000503-Prof.%20Mike%20Alder%20-%20Other-%20Biodiversity%20Ecology%20and%20natural%20Environment.pdf

Eventide-Special Report, 2021. *Eradicating Forced Labour from Solar Supply Chains.* [Online]
Available at: https://www.pv-magazine.com/wp-content/uploads/2022/12/Handout_Eventide-SpecialReport.pdf
[Accessed 21 July 2023].
Helena Kennedy Centre for International Justice: Sheffield Hallam University, 2021. *In Broad Daylight Uyghur Forced Labour and Global Solar Supply Chains.* [Online]
Available at:
https://acrobat.adobe.com/link/track?uri=urn%3Aaaid%3Ascds%3AUS%3Ad360ffab-40cc-4d83-8b8b-a8bd503286a3
[Accessed 21 July 2023].

Natural England, 2016. Evidence review of the impact of solar farms on birds, bats and general ecology, s.l.: Natural England.
The Planning Inspectorate, 2023. *Appeal Ref: APP/F1040/W/22/3313316.* [Online]
Available at:
https://acp.planninginspectorate.gov.uk/ViewCase.aspx?caseid=3313316
[Accessed 26 Jul 2023].