HELIOS RENEWABLE ENERGY PROJECT

PINS Document Number:
EN010140/APP/6.1.2

Pursuant to:
APFP Regulation 5(2)(a)

Environmental Statement Chapter 2
EIA Methodology

June 2024

2. Environmental Impact Assessment Methodology

2.1.1. This chapter is supported by the following figure:

- **Figure 2.1 Utilities Plan [EN010140/APP/6.2.2.1]**.

2.1.2. This chapter is supported by the following appendices:

- **Appendix 2.1 Scoping Report [EN010140/APP/6.3.2.1]**;
- **Appendix 2.2 Scoping Opinion [EN010140/APP/6.3.2.1]**;
- **Appendix 2.3 Construction Dust Risk Assessment [EN010140/APP/6.3.2.3]**;
- **Appendix 2.4 Phase 1 Ground Conditions Assessment [EN010140/APP/6.3.2.4]**;
- **Appendix 2.5 Solar Photovoltaic Glint and Glare Study [EN010140/APP/6.3.2.5]**; and
- **Appendix 2.6 Population and Human Health Technical Note [EN010140/APP/6.3.2.6]**.

2.2. Introduction

2.2.1. This chapter summarises the EIA scoping process, and the public consultation undertaken, and outlines the general methodology undertaken for the assessments within the ES. Bespoke methodologies, limitations, and assumptions are contained in the technical chapters, where required.

2.2.2. This ES has been prepared in accordance with the latest regulations, guidance, and good practice, comprising:

- the EIA Regulations;
- the PINS *Advice Note Seven: Environmental Impact Assessment: Process, Preliminary Environmental Information and Environmental Statement* (June 2020); *Advice Note Nine: Rochdale Envelope*[1] (July 2018); *Advice Note Ten: Habitats Regulations Assessment Relevant to Nationally Significant Infrastructure Projects*[2] (August 2022); *Advice Note Seventeen: Cumulative*

[1] Available at: https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/advice-note-nine-rochdale-envelope/ Accessed: August 2023.
[2] Available at: https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/advice-note-nine-rochdale-envelope/ Accessed: August 2023.

Effects Assessment Relevant to Nationally Significant Infrastructure Projects[3] (August 2019); *Advice Note Eighteen: The Water Framework Directive*[4] (June 2017);

- Institute of Environmental Management and Assessment ('IEMA') *Delivering Proportionate EIA*[5] (2017); and
- IEMA *Effective Non-Technical Summaries for Environmental Impact Assessment*[6] (2023).

2.2.3. The specific regulations, guidance, and good practice that have informed the technical disciplines are included within the corresponding chapters.

2.3. EIA Methodology

2.3.1. The Methodology section of each technical chapter within this ES:

- Summarises the outcomes of the EIA scoping process undertaken relevant to that topic;
- summarises the public consultation process and how relevant consultation items have been addressed;
- sets out the methodology used for the technical assessment;
- sets out the criteria used to determine the significance of potential environmental effects; and
- states the assumptions and limitations applicable to all disciplines.

2.3.2. The significance of an environmental effect is determined by the interaction of magnitude and sensitivity, whereby the nature of effects can be positive (beneficial) or negative (adverse), direct or indirect, and reversible or irreversible. Generic criteria used in carrying out this process are detailed below. Some technical chapters may use discipline-specific criteria with their own terms for magnitude, sensitivity and significance and, where used, this will be explained in the relevant chapter.

2.3.3. The Proposed Development has been assessed with an operational lifespan of 40

[3] Available at: https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/advice-note-17/ Accessed: August 2023.
[4] Available at: https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/advice-note-18/ Accessed: August 2023.
[5] Available at: https://www.iema.net/resources/reading-room/2017/07/18/delivering-proportionate-eia Accessed: August 2023.
[6] Available at: https://www.iema.net/policy-and-practice/practice-reports Accessed: February 2024

years, in general an environmental effect can be categorised as either permanent or temporary. The duration of temporary effects comprises:

- Short-term (a period of up to 3 year);
- Medium-term (a period of between 3 year and up to 15 years); and
- Long-term (a period of more than 15 years).

2.3.4. If an assessment uses different terminology than outlined above this will be defined in the Assessment Methodology section of the Chapter.

Prediction of Impact Magnitude

2.3.5. The methodology for determining the scale or magnitude of impact is set out Table 2.1 below.

Table 2.1: Methodology for Assessing Magnitude

Magnitude of Impact	Criteria for Assessing Magnitude of Impact
High	Total loss or major/substantial alteration to key elements/features of the baseline (pre-development) conditions such that the post development character/composition/attributes will be fundamentally changed.
Medium	Loss or alteration to one or more key elements/features of the baseline conditions such that post development character/composition/attributes of the baseline will be materially changed.
Low	A minor shift away from baseline conditions. Change arising from the loss/alteration will be discernible/detectable but not material. The underlying character/composition/attributes of the baseline condition will be similar to the pre-development circumstances/situation.
Very Low	Very little change from baseline conditions. Change barely distinguishable, approximating to a 'no change' situation.

2.3.6. The sensitivity of a receptor is based on the relative importance of the receptor using the scale set out in Table 2.2 below.

Table 2.2: Methodology for Determining Sensitivity

Sensitivity	Criteria for Determining Sensitivity of Receptor/Resource
High	The receptor/resource has little ability to absorb change without fundamentally altering its present character, or is of international or national importance.
Medium	The receptor/resource has moderate capacity to absorb change without significantly altering its present character, or is of high importance.

Sensitivity	Criteria for Determining Sensitivity of Receptor/Resource
Low	The receptor/resource is tolerant of change without detriment to its character, is of low or local importance.
Very Low	The receptor/resource is tolerant of change without detriment to its character, or does not make a significant contribution to local character or distinctiveness and is not designated

Assessment of Effect Significance

2.3.7. After the magnitude of the impact and the sensitivity of the receptor/ resource have been determined, the effect significance will be classified using the matrix in Table 2.3, unless otherwise stated in the technical ES chapter. This illustrates the interaction between impact magnitude and receptor sensitivity.

Table 2.3: Effect Significance Matrix

Magnitude	Sensitivity			
	High	Medium	Low	Very Low
High	Major Adverse / Beneficial	Major-Moderate Adverse / Beneficial	Moderate-Minor Adverse / Beneficial	Minor Adverse / Beneficial
Medium	Major-Moderate Adverse / Beneficial	Moderate -Minor Adverse / Beneficial	Minor Adverse / Beneficial	Negligible
Low	Moderate-Minor Adverse / Beneficial	Minor Adverse / Beneficial	Negligible	Negligible
Very Low	Minor	Negligible	Negligible	Negligible

Generic Effect Definitions

2.3.8. Table 2.4 below provides generic definitions of the terminology used to categorise effects.

Table 2.4: Generic Effect Definitions

Effect	Description
Major	An effect that is likely to be an important consideration to decision-making at a national to regional level because it will contribute to achieving national/regional objectives or is likely to result in exceedance of statutory objectives.
Moderate	An effect that is likely to be an important consideration at a regional level, and could have an important and relevant influence on decision-making.
Minor	An effect that is likely to be an important consideration at a local level, and may be of relevance in the detailed design but are unlikely to be critical in the decision-making process.
Negligible	An effect that is likely to have a negligible or neutral influence on

Effect	Description
	decision-making, irrespective of other effects.

Significance

2.3.9. Significance of effects has been identified in the technical chapters. As a general rule, major and moderate effects are considered to be 'significant' in the context of the EIA Regulations, whilst minor and negligible effects are considered to be not significant. However, professional judgment has also been applied and may adjust the significance of an effect where necessary, taking into account the expert's understanding of the balance between the magnitude of an impact and the sensitivity of the receptor/resource and whether the effect is permanent or temporary, its frequency, whether it is reversible, and its likelihood of occurrence.

2.4. Technical Assessments

2.4.1. Each ES chapter follows the headings set out below to ensure the ES is transparent, consistent, and accessible.

- Introduction;
- Planning Policy Context;
- Assessment Methodology;
- Baseline Conditions;
- Likely Significant Effects;
- Mitigation Measures;
- Residual Effects;
- Cumulative Effects; and
- Summary.

2.4.2. Each chapter sub-heading is explained in further detail in Table 2.5 below.

Table 2.5: Technical Chapter Format and Content

Sub-Heading	Content
Introduction	This section introduces the assessment discipline and the purpose for which it is being undertaken.
Planning Policy Context	This section includes a summary of national and local policies of relevance to the environmental discipline and assessment. Where applicable, relevant technical legislation is also

Sub-Heading	Content
	summarised.
Assessment Methodology	This section provides an explanation of methods used in undertaking the technical assessment with reference to the adopted EIA Scoping Opinion, published standards, guidelines, best practice, and the Statutory Consultation process. The application of significance criteria is also discussed. It also outlines any difficulties encountered in compiling the required information.
Baseline Conditions	This section includes a description of the environment as it is currently (at the time of writing the chapter and a 'Future Baseline' which describes how the baseline conditions would be expected to change if the Proposed Development were not to proceed. The method used to obtain baseline information is clearly identified. Baseline data have been collected in such a way that the importance of an affected subject area (and surroundings as appropriate) can be contextualized so that the effects of the proposed changes can be predicted.
Likely Significant Effects	This section identifies the likely significant effects on the environment resulting from the construction, operation and maintenance, and decommissioning phases of the Proposed Development. This assessment of magnitude, sensitivity and significance of effect takes all primary and tertiary mitigation measures into account as an integral part of the Proposed Development. Primary mitigation (also known as embedded mitigation includes modifications to the Site boundary or design of the Proposed Development made during the pre-application phase that are an inherent part of the Proposed Development, with no further actions required, such as ensuring that a key habitat or archaeological feature will be unaffected by the layout and operation. Tertiary mitigation comprises actions that would occur regardless of the EIA, including those undertaken to meet other existing legislative requirements, or actions that are standard practice to manage commonly occurring environmental effects.
Mitigation Measures	Mitigation measures put forward, where practicable, to reduce, avoid or offset any identified potential adverse effects. Secondary mitigation measures comprise actions that require further activity to achieve a particular outcome, secured for example through development consent requirements or section 106 obligations, such as lighting limits that will be subject to the submission of a detailed lighting layout for approval. The extent of the mitigation measures and their expected efficacy is discussed. Where the effectiveness is uncertain or depends upon assumptions about operating procedures, data are provided to justify these assumptions.
Residual Effects	The residual effects, i.e. the effects of the Proposed Development assuming implementation of proposed secondary mitigation, are determined. The residual effects represent the overall likely significant effect of the Proposed Development on the environment having taken account of practicable/ available mitigation measures.

Sub-Heading	Content
Cumulative Effects	The inter-project cumulative effects of the Proposed Development and the identified committed developments are assessed.
Summary	A summary of the assessment and conclusions, and of the intra-project effects, is provided at the end of each technical chapter.

2.5. Cumulative Effects

2.5.1. For NSIPs, the EIA Regulations require:

'*A description of the likely significant effects of the development on the environment resulting from, inter alia… the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources'*.

2.5.2. The approach to scoping the cumulative effects assessment in this ES has been informed by *Advice Note Seventeen: Cumulative Effects Assessment Relevant to Nationally Significant* as issued by PINS, whereby a long list of *'other existing development and/ or approved development'* is first established using the following considerations:

- The potential zone of influence for the environmental aspects to be assessed;
- Permitted applications, but not yet implemented;
- Submitted applications not yet determined but likely to come forward, such as those allocated under the Local Plan; and
- Applications not yet submitted but with a positive Screening Opinion or submitted requests for Scoping opinions.

2.5.3. The following criteria were applied to filter the long list to a short list of schemes to be assessed:

- Temporal scope and programme: to establish whether the relative construction, operation or decommissioning of the '*other existing development and/ or approved development'* overlaps with the Proposed Development;
- Geography, scale and nature of the development: to establish whether the '*other existing development and/ or approved development'* would be likely to interact with the Proposed Development'; and

- Other factors: to consider whether there are any other factors, such as the nature and/ or capacity of the receiving environment that would make a significant cumulative effect with *'other existing development and/or approved development'* more or less likely.

2.5.4. The long list and short list of schemes that were considered for the cumulative effects assessment were first provided to PINS and NYC for agreement via the Scoping Report **Appendix 2.1 [EN010140/APP/6.3.2.1]**, and an updated list provided in a letter to NYC in May 2023 (which was used to inform the assessment of cumulative effects undertaken in the PEIR). An updated list was provided in a letter to NYC in January 2024 to inform the assessment of cumulative effects undertaken for the ES; these letters are provided at **Appendix 15.1 [EN010140/APP/6.3.15.1]** and **Appendix 15.2 [EN010140/APP/6.3.15.2]** respectively. The shortlist of schemes for cumulative effects assessment, as of January 2024, is provided in **Chapter 15 Cumulative Effects [EN010140/APP/6.1.15]** of this ES.

2.5.5. The summary of the likely significant cumulative effects of the Proposed Development is set out in **Chapter 15 Cumulative Effects** [**EN010140/APP/6.1.15**] of this ES.

2.6. Summary and Residual Effects

2.6.1. The residual effects of the Proposed Development have been summarised in each technical chapter, and in a single table at the end of this ES (**Chapter 16 Summary and Residual Effects [EN010140/APP/6.1.16]**), setting out the overall beneficial and adverse likely significant effects of the Proposed Development.

2.7. Scoping Exercise

2.7.1. A scoping exercise was undertaken and informed by desk-based research, Site surveys and professional judgement.

2.7.2. As set out in the EIA Scoping Report submitted to PINS in June 2022 and PINS' EIA Scoping Opinion adopted in July 2022 (refer to **Appendices 2.1 [EN010140/APP/6.3.2.1]** and **Appendix 2.2 [EN010140/APP/6.3.2.2]**), the following topics have been scoped out of the ES, as set out in Table 2.6.

Table 2.6: Summary of Topics to be Scoped Out of the ES

Topic		PINS EIA Scoping Opinion Comment	Applicant's Response
Air Quality	**Vehicle Emissions**	PINS agreed to scoping out an assessment of air quality effects during all phases from vehicle emissions on the basis that the number of anticipated vehicle movements during construction (up to 100 Annual Average Daily Traffic for heavy goods vehicles) and operation (up to 10 two-way vehicle trips per month) are below relevant threshold criteria (Institute of Air Quality Management (IAQM, 2017).	As set out in **Chapter 10 Transport and Access [EN010140/APP/6.1.10]** of the ES, the relevant number of vehicles generated by the Proposed Development will not exceed the relevant threshold criteria.
	Dust Emissions	PINS is content to scope out a quantitative assessment of air quality effects from dust emissions on the basis that the risk of dust generation associated with the construction and decommissioning phases will be managed through the implementation of standard best practice and mitigation measures incorporated into the Construction Environmental Management Plan/ Decommissioning Environmental Management Plan (CEMP/ DEMP). A qualitative assessment of dust impacts based on relevant guidance (e.g. IAQM) should be provided to demonstrate that measures proposed are consistent with the scale of effects.	The outline Construction Environmental Management Plan ('oCEMP') is provided at **Appendix 5.1 [EN010140/APP/6.3.5.1]** and a qualitative assessment of dust impacts is provided at **Appendix 2.3 [EN010140/APP/6.3.2.3]**, which identifies that no significant effects are anticipated.
Land Contamination		PINS requires that the ES should be supported by the findings of a Preliminary Risk Assessment and where land contamination is identified, the ES should	The Preliminary Risk Assessment, referred to as the Phase 1 Ground Conditions Assessment, is provided at **Appendix 2.4 EN010140/APP/ 6.3.2.4]**. The Assessment identifies potential sources of

Topic	PINS EIA Scoping Opinion Comment	Applicant's Response
	assess significant effects where they are likely to occur.	contamination on-Site and off-Site, and their potential pathways to a receptor. The Assessment concludes that potential pollutant linkages identified on-Site are able to be mitigated through the implementation of standard mitigation measures, to be secured via DCO requirement. Significant effects are therefore not anticipated, and this topic remains scoped out of the ES.
Electric, Magnetic and Electromagnetic Fields (EMF)	PINS agrees that this may be scoped out as a technical chapter on the basis that cables and infrastructure are below relevant guidance thresholds referenced in the Scoping Report (DECC Power Lines: Demonstrating compliance with EMF public exposure guidelines, A Voluntary Code of Practice 2012 guidance[7]).	The Proposed Development will use cables and infrastructure with a maximum voltage up to and including 132kV, in line with the guidance quoted in the Scoping Report.
Telecommunications, Television Reception and Utilities	PINS considers that insufficient evidence has been provided to scope this matter out.	Utilities within the Site are as shown on **Figure 2.1 Utilities Plan [EN010140/APP/6.2.2.1]**. The Applicant confirms that no utilities or telecoms will require diversion or are planned to be affected. As set out within **Chapter 3 Site and Development Description [EN010140/APP/6.1.3]** of the ES, the design parameters have accounted for the required easements surrounding utilities present. Significant effects are therefore not anticipated, and this topic remains scoped out of the ES.
Wind Microclimate	PINS has considered the characteristics of the Proposed Development and is content that due to its nature, significant effects	Noted.

[7] DECC (2012), Power Lines: Demonstrating compliance with EMF public exposure guidelines, A Voluntary Code of Practice

Topic	PINS EIA Scoping Opinion Comment	Applicant's Response
	are not likely to occur, and this matter can be scoped out.	
Daylight, Sunlight and Overshadowing	PINS has considered the characteristics of the Proposed Development and is content that the scale and massing of the Proposed Development will not cause changes to daylight or sunlight visibility, or cause overshadowing and this aspect can be scoped out.	Noted.
Glint and Glare	PINS is content that a separate Glint and Glare Chapter is scoped out on the basis that the initial Glint and Glare assessment will be provided as a technical appendix to the ES and will be used to inform the Landscape and Visual Impact Assessment (LVIA) aspect Chapter.	The Glint and Glare assessment is provided at **Appendix 2.5 [EN010140/APP/6.3.2.5].**
Minerals	PINS agrees that on the basis that the Site is not located within a Mineral Safeguarding Area, this aspect can be scoped out.	As advised in **Appendix 2.4 Phase 1 Ground Conditions Assessment [EN010140/APP/6.3.2.4]**, and identified post-Scoping, the Site sits within a Minerals Safeguarding Area. The assessment identifies that the minerals present beneath the Site comprise sand and gravel deposits. The maximum depth of works associated with the Proposed Development is 2.5m (dependent on ground conditions, the works would therefore not disturb the mineral deposits and will not permanently sterilise mineral resources, considering the temporary nature of the proposed solar photovoltaic panels. Therefore, significant effects are not anticipated and this topic remains scoped out of the ES.
The following topics have been scoped out as separate ES chapters, and are considered within the relevant chapters of the ES.		

Topic	PINS EIA Scoping Opinion Comment	Applicant's Response
Human Health	PINS agrees that a standalone chapter on human health is not required on the basis that the Proposed Development will be designed to minimise any impact on human health and where there are interactions with human health these will be assessed within the relevant technical chapters of the ES. PINS requires that the ES should clearly set out potential impacts to human health from the Proposed Development during construction, operation and decommissioning and cross-reference where impacts are assessed within the ES.	In line with the adopted Scoping Opinion, a separate chapter assessing the potential effects to population and human health has not been included within the ES; health effects have instead been identified in the relevant ES chapters comprising Landscape & Views, Water Environment, Transport & Access, Noise, Climate Change and Socio-Economics.
Major Accidents and Disasters	The Inspectorate agrees that a standalone chapter would not be required, and that potential effects would be considered within the appropriate technical chapters. The Inspectorate also requires that the risk of fire associated with the battery storage facilities should be set out in the ES, and relevant mitigation should be set out and secured in the DCO.	The Battery Energy Storage System ('BESS') Safety Management Plan ('SMP') for the Proposed Development is provided at **Appendix 3.1 [EN010140/APP/6.3.3.1]**. The SMP identifies the potential hazards of energy storage systems of this type, and provides the basis for the safety management processes and procedures to mitigate the risk of hazards. The Applicant does not consider that further information within the ES is required; following the implementation of the mitigation proposed there will be no significant risk of major accidents and disasters. Furthermore, the BESS and Substation Preliminary Drainage Strategy is provided in **Figure 4.3 [EN010140/APP/6.2.4.3]** and detail can be found in the **Flood Risk Assessment [EN010140/APP/7.6]**. To ensure the risk of tidal or fluvial flood risk to the Substation and BESS Compound is mitigated for the modelled

Topic	PINS EIA Scoping Opinion Comment	Applicant's Response
		operational lifetime of the Proposed Development it is proposed to protect the equipment with a suitably designed earth flood defence bund. The height of the earth flood defence bund would be at least +0.6m above the combined fluvial and tidal design flood level, to protect the equipment from inundation, and BESS containers would be raised at least 0.3m (and up to a maximum of 0.6m) above ground which provides additional protection from the ingress of surface water within the bunded area.
Lighting	PINS requires that the ES should include a detailed description of the construction and operational lighting design and the measures taken to avoid or minimise lighting impacts on human and ecological receptors, including consideration of effects relating to intermittent lighting sources such as motion activated security lighting.	A description of lighting proposed is provided in **Chapter 3 Site and Development Description [EN010140/APP/6.1.3]** of the ES, and an assessment of the effects of lighting is included in **Chapter 7 Landscape and Views [EN010140/APP/6.1.7]** and **Chapter 8 Biodiversity [EN010140/APP/6.1.8]**.
Waste	PINS requires that an assessment of operational waste be provided where significant effects are likely to occur and outline what measures, if any, are in place to ensure that panels and any associated components are able to be diverted from the waste chain.	The Applicant has provided the requested measures within the oCEMP (**Appendix 5.1 [EN010140/APP/6.3.5.1]**) and confirms that no significant effects are likely.

2.8. Topics Scoped In

2.8.1. The Proposed Development is anticipated to result in likely significant environmental effects on the topics set out in Table 2.7 below and therefore these topics have been scoped into the ES.

Table 2.7: Summary of Topics Scoped Into the ES

Topics	Potential for Significant Effects and Proposed Development Stage			Potential for Significant Effects	Comments
	Construction	Operation	Decommissioning		
Cultural Heritage	✓	✓	✓	✓	Chapter 6 [EN010140/APP/6.1.6]
Landscape and Views	✓	✓	✓	✓	Chapter 7 [EN010140/APP/6.1.7]
Biodiversity	✓	✓	✓	✓	Chapter 8 [EN010140/APP/6.1.8]
Water Environment	✓	✓	✓	✓	Chapter 9 [EN010140/APP/6.1.9]
Transport and Access	✓	x	x	✓	Chapter 10 [EN010140/APP/6.1.10]
Noise and Vibration	✓	✓	✓	✓	Chapter 11 [EN010140/APP/6.1.11]
Climate Change	✓	✓	x	✓	Chapter 12 [EN010140/APP/6.1.12]
Socio-Economics	✓	✓	✓	✓	Chapter 13 [EN010140/APP/6.1.13]
Soils and Agricultural Land	✓	✓	x	✓	Chapter 14 [EN010140/APP/6.1.14]

Key:
✓ Likely Significant Effect / x No Likely Significant Effect

2.9. Consultation

2.9.1. As advised in Chapter 1 Introduction [EN010140/APP/6.1.1], paragraph 1.1.3, of this ES, the Statutory Consultation period ran from 26th October until 21st December 2023, during which time local communities and stakeholders were consulted in accordance with sections 42, 47, and 48 of the PA2008, and regulations 11 to 13 of the EIA Regulations.

2.9.2. The responses received from the Statutory Consultation process have been reviewed and, where required, the design of the Proposed Development, or ES methodology have been amended accordingly. Where responses have been received from Statutory Consultees, the items raised have been recorded via a Statement of Common Ground. A draft Statement of Common Ground has been prepared and has or will be shared with the relevant consultees (North Yorkshire Council, Natural England, The Environment Agency, National Highways, Historic England, and North Yorkshire Fire and Rescue Service), details can be ground in the **Statement of Common Ground Status [EN010140/APP/7.9]**.

2.9.3. Items that pertain to specific technical assessments have been addressed in the corresponding technical chapters of this ES. Items that fall outside of this remit are summarised in Table 2.8 below.

Table 2.8: Statutory Consultation Responses

Topic	Consultee	Consultee's Comment	Applicant's Response
Air Quality	Natural England	Natural England advise that an assessment should be made of all potential air quality impacts on statutory designated sites for all stages of the project, including those associated with construction phase traffic and equipment / generators used during construction. The assessment should be undertaken in line with Natural England's guidance NEA001. Assessment of potential air quality impacts from construction phase traffic should be undertaken where any affected routes are within 200m of any internationally or nationally designated site. For European sites, this assessment should be included as part of the Habitats Regulations Assessment (HRA). Further to the advice in NEA001, if it is determined that there are potential significant impacts from pollution associated with traffic then an assessment of ammonia impacts should also be undertaken.	The only road used by construction vehicles within 200m of a designated habitat is a 300m stretch of the M62, where it traverses the Humber Estuary. As this is part of the strategic road network, published guidance states that impacts should be dealt with at a strategic level, rather than by individual projects. In any case, due to the expected low quantum of construction traffic, expected temporary construction period timeframe, the relatively small area affected, tidal flushing events and the relatively low sensitivity of the estuary features in this location, there are unlikely to be any air quality impacts on the Humber Estuary. Locations where any construction equipment, including generators, will operate are over 2 km from the nearest nationally or internationally designated site. A suite of environmental control measures will be secured as part of a detailed CEMP which will ensure that the potential for impacts is minimised as far as practicable. Considering the distances between the works and the designated sites, the temporary duration of the works, and the mitigation measures, there are unlikely to be any air quality impacts from construction works on any designate site. Traffic volumes generated by the Proposed Development once it is fully operational will be well below Natural England's screening threshold of 1,000 vehicles, whilst emissions from the decommissioning phase, at the end of the Proposed Development's 40-year operational lifespan, will be zero. There is,

Topic	Consultee	Consultee's Comment	Applicant's Response
			therefore, considered to be no risk of air quality impacts on designated sites as a result of the construction, operation or decommissioning of the Proposed Development, and no further consideration is required.
	North Yorkshire Council	Construction compound(s) are proposed within the Site adjacent to the Site entrance. North Yorkshire Council recommend that consideration is given to safeguarding the amenity of existing sensitive receptors when siting construction compound(s).	Construction compounds will be placed within the Order Limits and has been assessed in the ES to ensure avoidance of sensitive receptors when the specific location of the compounds is decided at the detailed design phase. This is discussed in **Chapter 5 Construction Methodology and Programme [EN010140/APP/6.1.5]**.
		North Yorkshire Council request assurances that the cumulative effects of any dust creation during construction phase combined with other relevant developments in the area has been taken into account. Chapter 15 (Cumulative Effects) does not make reference to air quality.	The guidance published by the Institute of Air Quality Management on the assessment of construction dust is clear that, with appropriate mitigation measures in place, any residual dust effects from an individual site will be 'not significant'. The guidance also suggests that cumulative construction dust impacts are only likely where sites are within 500 m of each other. Work would also have to be taking place in areas of both sites that are close to a receptor in order for cumulative effects to occur. The construction dust assessment (**Appendix 2.3 Qualitative Dust Assessment [EN010140/APP/6.3.2.3]**) recommends that regular liaison meetings are held with any high risk construction sites within 500 m of the site boundary to ensure that plans are coordinated and dust and particulate matter emissions are minimised. It is expected that all construction sites in the area will adopt appropriate mitigation measures to limit emissions of dust, will hold the recommended

Topic	Consultee	Consultee's Comment	Applicant's Response
			liaison meetings and will ensure that plans are coordinated to minimise impacts upon the most sensitive receptors. With these measures in place, the cumulative effects of construction activities, are expected to be 'not significant'.
	UK Health Security Agency (UKHSA) & Office for Health Improvement and Disparities (OHID)	The UKHSA & OHID recommends the Applicant considers an assessment of air quality impacts from a battery storage fire and compares these to relevant air quality levels, which are protective of health.	The Outline Battery Safety Management Plan is provided at **Appendix 3.1 [EN010140/APP/6.3.3.1]** of the ES. The Safety Management System (SMS) provides a system of management that ensures that all safety related aspects are managed in accordance with applicable industry standards and United Kingdom (UK) legislation.
Population and Human Health	North Yorkshire Council	North Yorkshire Council request that a chapter be added to the ES to consider the potential impacts to population and human health against the local health baseline conditions.	In their Scoping Opinion, PINS agreed that a *'standalone chapter on human health is not required on the basis that the Proposed Development will be designed to minimise any impact on human health and where there are interactions with human health these will be assessed within the Noise and Transport aspect chapters of the ES. Impacts to human health may extend beyond the Traffic and Access and Noise Chapters proposed and the ES should clearly set out potential impacts to human health from the Proposed Development during construction, operation and decommissioning and cross-reference where impacts are assessed within the ES e.g. Landscape and Visual, Land Contamination and Socio-Economics*.' This is also agreed as a proportionate approach by the UK Health Security Agency in their scoping response. Human health was not identified as a topic likely to result in significant effects in North Yorkshire Council's

Topic	Consultee	Consultee's Comment	Applicant's Response
			scoping response. It was discussed in a meeting with North Yorkshire Council on 18th January 2024 that, in-line with the adopted Scoping Opinion and IEMA guidance[8], the addition of a Population and Human Health chapter to the ES would not be appropriate or proportionate as no significant effects to health were identified in the EIA Scoping exercise or the PEIR. The Applicant agreed to provide a technical note summarising the local health baseline and the health effects identified in the technical chapters of the ES. This is provided at **Appendix 2.6 Population and Human Health Technical Note [EN010140/APP/6.3.2.6]** of this ES, which concludes that there are no significant effects to health arising from the Proposed Development.
EMF	UKHSA & OHID	The UKHSA & OHID advises they are satisfied that the Applicant is aware of the EMF guidance, but should ensure that compliance is demonstrated in the Environmental Statement.	This is provided in **Chapter 3 Site and Development Description [EN010140/APP/6.1.3]**.
Fire Safety	Environment Agency	The Environment Agency requests that the Applicant considers the impact to all environmental receptors during each phase of development, from the potential pollution that may arise from the BESS. Particular attention is requested to the impacts on groundwater and surface water	As shown in the Substation Preliminary Drainage Strategy Figure 4.3 [EN010140/APP/6.2.4.3] and the **Flood Risk Assessment [EN010140/APP/7.6]**. In summary the entirety of the BESS Compound would be lined with an impermeable liner (geomembrane, or similar) to prevent the formation of a pathway between the surface and underlying aquifer. The runoff rate would be limited to 1.4 litres per second per hectare

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		from the escape of firewater/foam and any contaminants that it may contain. Suitable environmental protection measures should be provided including systems for containing and managing water run-off.	(/s/ha) (3.6 l/s) (in line with Selby area Internal Drainage Board (IDB) run off rate restriction and less than the greenfield rate of 4.1 l/s) for the BESS Compound for all rainfall events up to the 100-year return period event, including an allowance for climate change. As such the Proposed Development would reduce flood risk overall when compared to existing greenfield runoff rates. The surface water would be managed through Sustainable Drainage Systems (SuDS), the runoff would be collected by a series of filter drains in three sub-catchments, and would be conveyed to a filter collector drain, then to three attenuation basins with sediment forebays designed to reduce runoff rates. Finally, runoff would be discharged at a controlled rate into site drainage ditches / watercourses. In the unlikely event of a fire, the outfalls of the surface water management system would be closed and all runoff would be contained in the SuDS (which has been designed to store significantly in excess of the volume of water required for a fire response). If water within the attenuation basins is identified as being contaminated, it will be removed from the Site using tankers for off-site treatment and disposal (this will be secured through DCO requirement).
	North Yorkshire Council	North Yorkshire Council requests clarification regarding the emergency response to potential fire events at the BESS.	Fire management is addressed in **Appendix 3.1 Battery Safety Management Plan [EN010140/APP/6.3.3.1]** of this ES.
	UKHSA & OHID	The UKHSA & OHID requests that a Fire Prevention Plan is provided by	Fire prevention and management is addressed in **Appendix 3.1 Battery Safety Management Plan of**

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		the Applicant, and that the BESS is sensitively sited to avoid adverse impacts.	**this ES [EN010140/APP/6.3.3.1]**. The BESS will be placed within a zoned location, as identified and assessed in the ES, to ensure avoidance of sensitive receptors when the specific location of the compounds is decided at the detailed design phase.
Glint and Glare	Natural England	Natural England requests the glint and glare impacts from the panels are assessed in Chapter 8 Biodiversity.	The assessment of glint and glare has been incorporated to **Chapter 8 Biodiversity of this ES [EN010140/APP/6.1.8]**.
Land Contamination	North Yorkshire Council	Phase 1 Ground Conditions Assessment identifies potential risks associated with possible contamination on limited areas of the Site. North Yorkshire Council agree that an intrusive ground investigation and a detailed unexploded ordnance (UXO) desk-based threat assessment are needed to characterise the conditions at the Site and inform the need for mitigation.	A detailed desk-based UXO assessment and intrusive ground investigation will be conducted at the detailed design stage. The Phase 1 Ground Conditions Assessment (**Appendix 2.4 [EN010140/APP/6.3.2.4]**) identified that the potential for significant contamination is considered low. Any contamination identified during the detailed design phase is likely to relate to the historic use of the Site for agricultural purposes, and therefore any remediation required can be undertaken using standard methods with known efficacy. The potential exists for the presence of UXO, therefore the detailed design stage will include a detailed desk-based assessment for UXO in accordance with strict protocols for the protection of human health, to be secured through DCO requirement. Any UXO identified will be removed from the Site in accordance with defined protocols. The construction works will not commence until the UXO risk is removed. As the Site will be cleared of UXO there is no requirement to amend the scheme design and therefore there will be no significant residual effects on this assessment or any technical assessment within the ES.