



Rob Collin
Green Cat Renewables Ltd
Stobo House
Roslin
EH25 9RE

Planning Ref: 23/01779/SCOPE
Your Ref:
Contact: Mr David Love
Direct Line:
Email: David.Love@northumberland.gov.uk
Date: 22nd June 2023

Via email – robertc@greencatnewables.co.uk

Dear Adrian,

**Scoping Opinion of Northumberland County Council
The Town and Country Planning (Environmental Impact Assessment)
Regulations 2017**

Proposal: Installation of wind turbine

Location: Land South of Norham Village and North of Newbiggin Dean Norham

I refer to your submission dated April 2023 in which you request a Scoping Opinion from Northumberland County Council based on the information contained in the Scoping Report provided with your request. Northumberland County Council's Scoping Opinion on the information to be provided in the Environmental Statement is attached.

I trust this is of some assistance. If you require any clarification on the contents of the Scoping Opinion, please do not hesitate to contact me.

Yours sincerely

David Love
Senior Planning Officer
Planning Services



The Town and Country Planning (Environmental Impact Assessment) Regulations 2017

SCOPING OPINION

Proposal: Installation of wind turbine

Location: Land South of Norham Village and North of Newbiggin Dean Norham

Introduction

Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ("the 2017 EIA Regulations") enables a person who is minded making an EIA application to ask the relevant planning authority to state in writing their opinion as to the information to be provided in the accompanying Environmental Statement (a "scoping opinion"). In this way, the applicant can be clear what the planning authority considers are the potential impacts on the environment which should be assessed in connection with the proposed development.

In May 2023, Green Cat Renewables Ltd requested a scoping opinion from Northumberland County Council in connection with a solar farm and battery storage at Land South of Norham Village and North of Newbiggin Dean Norham

This is Northumberland County Council's Scoping Opinion on the information to be provided in the Environmental Statement (ES).

Description of the proposed development and site

The proposal relates to the development of a solar farm and associated battery storage facility. It is proposed that the development would comprise the following elements:

- One three-bladed horizontal axis wind turbine measuring up to 67m tip height;
- Solar PV arrays and associated works;
- Hardstanding area for cranes at the turbine location;
- Turbine foundations;
- Site access track;
- Drainage works as required;
- An on-site electrical sub-station and control network of buried cables;
- A temporary construction compound, including parking and welfare facilities; and
- Associated ancillary works.

The site area totals some 0.08ha. The key concerns relate to the natural and historic environment designations that the development has the potential to impact.

Need for EIA

The proposal is for the development of a renewable energy installation including wind turbine up to 67m to blade tip and a solar array generating up to 9.8MW. In this regard it falls under schedule 2 subsection 3 (i) as the turbine height exceeds 15m. Further the solar arrays look like they exceed 0.5ha in area and so would fall within subsection (a). The applicant has not requested a Screening Opinion for the need of an ES but has requested a Scoping Opinion.

The ES should be proportionate to the proposal and should scope out those elements where there is negligible environment harm.

Consultation

The Council has a duty under Regulation 15 of the 2017 Regulations to consult the relevant consultation bodies before adopting a scoping opinion. In respect of this proposal, the Council has consulted the following bodies:

- Historic England
- Environment Agency
- Northumbrian Water
- Natural England
- National Air Traffic Services
- NCC Archaeology
- NCC Ecology
- NCC Building Conservation
- NCC Highways
- NCC Public Protection
- Local Lead Flood Authority
- Norham Parish Council
- NCC Climate Change
- NCC Rights of Way

Copies of the responses received from the above are provided in Appendix A, as separate document. Please note that no response has been received from NCC Conservation, NCC Climate Change, NCC Archaeology or Natural England. Please note we have not consulted Scottish Borders Council and you may wish to discuss the proposal with them separately, but they will be consulted on any planning application. The applicant should refer to these responses when undertaking the ES.

Scoping Methodology

In accordance with Regulation 15, before adopting a Scoping Opinion, the Council must consider the specific characteristics of the development and of development of the type concerned, together with the environmental features likely to be affected by the proposed development.

General Structure of the Environmental Statement

Schedule 4 of 2017 Regulations provides details of information that must be included in an ES.

The Council recommends that the ES follows the structure outlined below:

- Method Statement
- Conclusions of scoping exercise – the key issues
- Description of the proposed development, site, and surroundings, including alternatives studied
- Plans and policies context
- Assessment of environmental effects by topic area
- Inter-relationships/Conclusions
- Appendices – technical data

The ES should not be overly long and should be understandable to the public. Ideally, it should not contain technical jargon or include technical data and calculations that can only be understood by experts. Technical words should always be explained where their use is unavoidable, and technical data can be provided in separate appendices.

A separate non-technical summary is also required in accordance with the 2017 Regulations. This should ideally be no more than 10 pages of easily reproducible text and illustrations. It should include information on the development, the main environmental impacts, and the mitigating measures.

Planning policies

The ES is required to demonstrate full compliance with all relevant national and local planning policies. In this instance the relevant policies would be the National Planning Policy Framework and the Planning Practice Guidance. The Development Plan consists of the Northumberland Local Plan (adopted 31 March 2022). The policies from each that are relevant to the assessment of the proposed development are listed below.

Northumberland Local Plan (March 2022):

- Policy STP 1: Spatial strategy
- Policy STP 2: Presumption in favour of sustainable development
- Policy STP 3: Principles of sustainable development
- Policy STP 4: Climate change mitigation and adaption
- Policy STP 5: Health and wellbeing
- Policy QOP 1: Good design and amenity
- Policy QOP 2: Good design and amenity
- Policy QOP 4: Landscaping and trees
- Policy QOP 5: Sustainable design and construction
- Policy TRA 2: The effects of development on the transport network
- Policy ENV 1: Approaches to assessing the impact of development on the natural, historic, and built environment
- Policy ENV 2: Biodiversity and geodiversity
- Policy ENV 3: Landscape
- Policy ENV 4 Tranquillity, dark skies and a sense of rurality
- Policy ENV 7 Historic environment and heritage assets
- Policy ENV 9 Conservation Areas
- Policy WAT 1: Water Quality
- Policy WAT 3: Flooding
- Policy WAT 4: Sustainable Drainage Systems
- Policy POL 2 Pollution and air, soil and water quality
- Policy POL 3 Best and most versatile agricultural land
- Policy MIN 4 Safeguarding mineral resources (Strategic Policy)
- Policy REN 1 Renewable and low carbon energy and associated energy storage
- Policy REN 2 Onshore wind energy development

EIA Topics

The following topics have been identified but may be scoped out of the process depending on the findings of specific supporting documentation. This response focuses on those elements of local impact.

- Introduction
- Legislative Policy and Context
- Project Description
- Approach to Scoping and EIA Methodology
- Stakeholder Engagement and Consultation
- Landscape and Visual Impact Assessment (LVIA)
- Cultural Heritage
- Noise
- Hydrology and Hydrogeology
- Ecology
- Ornithology
- Traffic and Transport
- Shadow Flicker
- Aviation and Radar
- Telecommunications
- Carbon Balance
- Other Issues
- Landscape and Visual Impact Assessment Figures
- Planning Drawings and Technical Figures
- Non-Technical Summary

You should also consider construction and restoration impacts as part of the proposals.

Please note that I have not sought to recreate the general thrust of the consultee comments, therefore comments below should be considered in context of their submissions.

Likely Significant Effects of the Development

Landscape and Visual Amenity

The environmental assessment should refer to the relevant National Character Areas. Character area profiles set out descriptions of each landscape area and statements of environmental opportunity.

The ES should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies. We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.

A landscape and visual impact assessment should also be carried out for the proposed development and surrounding area. Natural England recommends use of the methodology set out in Guidelines for Landscape and Visual Impact Assessment 2013 ((3rd edition) produced by the Landscape Institute and the Institute of Environmental Assessment and Management. For

National Parks and AONBs, we advise that the assessment also includes effects on the 'special qualities' of the designated landscape, as set out in the statutory management plan for the area. These identify the landscape and related characteristics which underpin the natural beauty of the area and its designation status.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. This should include an assessment of the impacts of other proposals currently at scoping stage.

To ensure high quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the proposed development should reflect local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides as well as guidance in the National Design Guide and National Model Design Code. The ES should set out the measures to be taken to ensure the development will deliver high standards of design and green infrastructure. It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit.

Agricultural Land Quality

An assessment of the agricultural land quality will need to be included in the submission and what impacts this might have on the surrounding land use. Most solar farms will allow for grazing of sheep and therefore some element of agriculture remains. You will need to demonstrate that the land quality is sufficiently poor as to warrant being removed from agricultural production.

Traffic and Transport

In terms of the scope of the EIA in traffic movements, the (former) Institute of Environmental Management's Guidelines for the Environmental Assessment of Road Traffic indicates that a slight effect of road traffic increases from development occurs beyond an increase of 30% of the baseline AADT traffic flows for all traffic movements and/or for HGV movements.

It is stated that the development is not likely to cause any significant additional traffic other than during the construction period. However, no baseline traffic movements have been provided as part of this application, and therefore it is not possible to determine the precise scope of the EIA. The applicant must note that the EIA should screen the requirements in line with the guidance and include an assessment where AADT traffic flows for all vehicles or HGV (Heavy Goods Vehicles) movements exceed 30% on baseline flows.

The applicant is advised that it is demonstrated that all movements during both construction and operation can be accommodated on the existing highway network and identify any necessary mitigation measures in relation to capacity and highway safety. This will assist in the screening of the Transport chapter of the EIA, and it is welcomed that a Transport Method Statement will be produced to assess trips generated by the development. Anticipated vehicle numbers are required in respect of demonstrating the thresholds are not met and that there will be no detrimental impact from the development.

Lighting/Glare

Any lighting to the development site must be designed so that it is the minimum needed for security and operational processes and be installed to minimise potential pollution caused by glare and spillage. A lighting assessment will be required to be submitted with any application for planning permission, along with an assessment for potential glare from the solar panels.

This assessment should also include the effects on nearby residential properties.

Ecology

The local records centre Environmental Records Information Centre for the North East of England (ERIC) data has been omitted from the list of data sources. This needs to be added in to ensure adequate species and Local Wildlife Site information is obtained. We recommend an area of 2km from the edge of the site is included to ensure adequate records are identified.

The desk study for ornithology needs to be considered carefully in order to rule out the presence of wintering birds and raptors. As well as data from ERIC, other sources such as data from local bird group and BTO reports may need to be included.

The nearest protected site to the development is the Tweed Catchment Rivers England:lower Tweed and Whiteadder Site of Special Scientific Interest (SSSI) which is part of the wider River Tweed Special area of conservation (SAC). The only impact pathway between this protected site and any of the development is the potential of pollution/silt/runoff etc on the R. Tweed or the tributaries which may be caused by the Development.

We do consider however that solar farms and potentially windfarms can have a positive effect on these sites due to the cessation of arable farming operations such as ploughing, fertiliser and chemical inputs. We disagree with the statements about Protected sites for birds within 20km. Please ensure you assess any impacts to Special Protection Areas (SPA) within this distance, especially those such as Lindisfarne SPA and Holburn Moss SPA which have wintering geese among their interest features as these species can commute long distances to feed. In addition, there is a Scottish SPA called Greenlaw Moor about 18 km from the site about which we have no details. These sites need to be screened out with respect to impacts to qualifying features by looking at potential migration pathways and habitat connectivity. Further survey and a Habitats Regulation Assessment may need to be undertaken if impacts cannot be screened out.

Advice from Natural England and potentially NatureScot may be required with respect to this assessment.

The land is predominantly arable land and within the site itself, there is only field margins and hedges to consider in a baseline habitat survey. There are highly unlikely to be any NVC communities to assess on the site itself. We will most likely require a baseline Biodiversity net gain assessment using UK Hab Classifications and proposals for offsetting any losses. Currently we have an interim position statement on Biodiversity Net Gain.

Secondary legislation for mandatory net gain with further clarification of policy on net gain is expected this autumn. Any planning application which is live after 1st November is likely to have to conform in full to this legislation.

An assessment of the value of hedges on the site will be required and impacts to their value and connectivity should be minimised as far as possible when designing the development

including the access facilities.

The main emphasis for phase 2 surveys will be within the broadleaved woodlands adjacent to the site should impacts be predicted. We will be looking for an adequate buffer (15m or more) between these woodlands and any part of the development which is likely to preclude the need for detailed habitat surveys and minimise the need for protected species surveys.

Providing an adequate buffer is maintained between the development and the woodland to the south, the impact to bats is likely to be limited. There is little scope for bats to roost on the site. (1 tree where the access track is proposed). Bats are likely to be predominantly associated with the woodlands and field margins on or close to the site. A habitat assessment and assessment of potential commuting routes may be required, however for turbines a 50m buffer between the turbine and any habitats such as hedges is usually acceptable. This may require adjusting for a larger turbine that is proposed here. (see: Natural England Technical Information Note TIN059). Although the full range of surveys are proposed, in reality, an initial assessment is likely to rule out the need for many of the phase 2 surveys. We would prefer that the turbine is located at an adequate distance from the nearest hedge to avoid impacts.

Generic survey guidelines are included for species which may be present in the vicinity, which is appropriate. But there is little, if any, riparian habitat on the site and we would expect a buffer from the woodland/riparian habitats which will reduce the potential impact to most species. The area quoted for field survey for individual species appears to be appropriate.

Again, the bird surveys proposed are generic and will be refined in the baseline Ecological Impact Assessment. Because of the woodland, adjacent and further afield, raptor studies are important to rule out potential impacts of the development. It is not clear from the documents which raptor survey technique will be used but this will need agreeing once the decision has been made.

We do not have much information for the area regarding wintering birds, and in particular the use of the site/area by Annex 1 species associated with nearby protected sites.

To be able to rule out impacts from the Turbine, a robust data search will be required, leading in turn to a robust justification of why conclusions have been made.

The bird survey guidelines recommend that six bird survey visits will be undertaken as part of a survey for breeding birds (rather than the three that have been proposed)

Archaeology and Cultural Heritage

The proposed development site has the potential for significant impacts on a variety of historic designations. I note the documentation does not include all listed buildings that may be affected.

If, having regard to the outcome of discussions with the relevant authorities, the applicant wished to progress with a formal application, an appropriate Heritage Impact Assessment should be undertaken to inform a detailed application. The scope of an appropriate assessment, proportionate to the significance of the archaeological resource should be discussed and agreed with the council's Conservation Team and other relevant consultees. This work should be undertaken prior to the determination of an application in line with

paragraph 194 of the NPPF (National Planning Policy Framework) and Policy ENV 7 of the Northumberland Local Plan.

Based on the information submitted with the application, it is considered that the proposed development has potential to generate significant environmental impacts in respect of the archaeological resource. Please note comments from Historic England and their concerns regarding your commentary.

Noise and Vibration

You will need to consider the potential for disturbance through noise and vibration. Although there are limited sensitive receptors in the area you should still undertake an assessment to ensure the noise and vibration generated through construction and operation do not adversely impact on existing residential properties and / or businesses.

Glint and Glare

You will need to consider the potential for glint and glare impacts on the highway and what, if any, affect the turbine might have cumulatively.

Air Quality

Air quality in the UK has improved over recent decades but air pollution remains a significant issue. For example, approximately 85% of protected nature conservation sites are currently in exceedance of nitrogen levels where harm is expected (critical load) and approximately 87% of sites exceed the level of ammonia where harm is expected for lower plants (critical level of 1 μ g) [1]. A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The Government's Clean Air Strategy also has several targets to reduce emissions including to reduce damaging deposition of reactive forms of nitrogen by 17% over England's protected priority sensitive habitats by 2030, to reduce emissions of ammonia against the 2005 baseline by 16% by 2030 and to reduce emissions of NOx and SO2 against a 2005 baseline of 73% and 88% respectively by 2030. Shared Nitrogen Action Plans (SNAPs) have also been identified as a tool to reduce environmental damage from air pollution.

The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly, or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water, and land. The ES should take account of the risks of air pollution and how these can be managed or reduced. This should include taking account of any strategic solutions or SNAPs, which may be being developed or implemented to mitigate the impacts on air quality. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System

Climate Change and Carbon Assessment

The ES should identify how the development affects the ability of the natural environment (including habitats, species, and natural processes) to adapt to climate change, including its ability to provide adaptation for people. This should include impacts on the vulnerability or resilience of a natural feature (i.e., what is already there and affected) as well as impacts on how the environment can accommodate change for both nature and people, for example whether the development affects species ability to move and adapt. Nature-based solutions,

such as providing green infrastructure on-site and in the surrounding area (e.g., to adapt to flooding, drought, and heatwave events), habitat creation and peatland restoration, should be considered. The ES should set out the measures that will be adopted to address impacts.

Further information is available from the Committee on Climate Change's (CCC) Independent Assessment of UK Climate Risk, the National Adaptation Programme (NAP), the Climate Change Impacts Report Cards (biodiversity, infrastructure, water etc.) and the UKCP18 climate projections.

The Natural England and RSPB Climate Change Adaptation Manual (2020) provides extensive information on climate change impacts and adaptation for the natural environment and adaptation focussed nature-based solutions for people. It includes the Landscape Scale Climate Change Assessment Method that can help assess impacts and vulnerabilities on natural environment features and identify adaptation actions. Natural England's Nature Networks Evidence Handbook (2020) also provides extensive information on planning and delivering nature networks for people and biodiversity.

The ES should also identify how the development impacts the natural environment's ability to store and sequester greenhouse gases, in relation to climate change mitigation and the natural environment's contribution to achieving net zero by 2050. Natural England's Carbon Storage and Sequestration by Habitat report (2021) and the British Ecological Society's nature-based solutions report (2021) provide further information.

Recreation and Amenity

The site is currently used as part of the airfield. It is understood that a local glider club uses the site, and it may have other uses beyond this. Your assessment should include details of the impacts on the current recreational uses and mitigation as appropriate.

Assessment of Alternatives

The ES should set out a detailed analysis of reasonable alternatives (including location and scale) and the decisions to take forward or discard alternatives, from project inception to final design of the scheme and proposed mitigation.

Cumulative Impacts

The need to address cumulative impacts as set out in the scoping report and should be included in the ES.

Closing Remarks

This Scoping Opinion is provided in accordance with the 2017 Regulations and has taken account of the nature and scale of the proposals, the nature of the receiving environment and current best practice in the preparation of Environmental Statements.

Comments and recommendations in this Scoping Opinion should be read in conjunction with the information submitted with this request. The Scoping Opinion does not represent the Northumberland County Council's final view in relation to an application for planning permission. This Scoping Opinion does not preclude Northumberland County Council from subsequently requiring the person who made the request (or submits a planning application for

the proposed development) to submit additional information in connection with any application for planning permission.

In accordance with Regulation 28 of the 2017 Regulations, a copy of this Scoping Opinion will be made available for public inspection on the planning register.

Report author:

Name: David Love, Senior Planning Officer

Date: 22nd June 2023

Checked by:

Name: James Hudson

Date: 22nd June 2023

