Immingham Battery Energy Storage System

Request for Environmental Impact Assessment Screening Opinion

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Document Control Sheet

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1 Introduction

1.1 Background

1.1.1 Immingham Energy Storage Limited are formally requesting an Environmental Impact Assessment (EIA) Screening Opinion Request (SOR) to North Lincolnshire Council (NLC or the LPA) for the proposed installation of a Battery Energy Storage System (BESS), customer substation, the erection of a Wildlife Tower and associated engineering and landscaping works on land east of East Halton (the Project).

1.1.2 The information provided within this request satisfies the requirements outlined in Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the 'EIA Regulations').

1.1.3 The SOR contains:

- A site plan;
- A description of the development required;
- Shadow Habitats Regulation Assessment; and
- A description, based on current understanding, of any likely significant effects of the Proposed Development on the environment.

1.2 NatPower Development Ltd

1.2.1 Immingham Energy Storage Limited is a Special Purpose Vehicle managed by NatPower Development Ltd "NatPower". NatPower is an independent renewable energy development platform, identifying and delivering sites for renewable energy production. NatPower has over 200 renewables projects, spanning solar, BESS, wind, hydro-electric and hydrogen, across 9 countries.

1.2.2 Within the UK, NatPower is delivering large-scale battery storage projects, along with transmission substations, to help overcome grid bottlenecks and connection delays that are currently slowing the energy transition.

1.3 Site Location and Characteristics

1.3.1 The red-line boundary comprises two non-contiguous land parcels (the Site). The red-line boundary extends south to the roundabout at the junction of Chase Hill Road and Eastfield Road, which provides the vehicular access point into the site. The overall red line plan is shown on the Site Location Plan (ref. 1601-NPLUK-PS-BE01-DR-ED-0001).

1.3.2 The southern land parcel extends to approximately 16.9 ha (shown on drawing reference 1601-NPLUK-PS-BE01-DR-ED-0002) at approximately grid reference 514654 (Easting) and 419626 (Northing).

1.3.3 The southern land parcel occupies elements of six agricultural fields. The parcel was laid out in its irregular form to reflect extant planning permission PA/2009/0600 (and subsequent modifications). The proposed BESS development footprint is sited to align with those consented boundaries. At present, the parcel is in agricultural arable production, with field boundaries defined by intermittent hedgerows and post-and-wire fences.

1.3.4 Vehicular access to the southern parcel will be taken from the spine road associated with the extant permission, which enters the site via the roundabout with Chase Hill Road and Eastfield Road to the south. The spine road is due to commence construction in April 2025. Heavy and oversized deliveries are anticipated to be routed via the Port of Immingham. All

other traffic associated with the development would come via the existing road network from the A160 and A180.

1.3.5 The southern parcel is generally level with no permanent built features within the parcel. Three public right-of-way (PRoW) Public Footpaths traverse the parcel, two on a broadly east to west alignment and the third on a north to south alignment. A small copse of woods lies adjacent to the western boundary.

1.3.6 The onshore substation associated with Hornsea 2 offshore windfarm is located approximately 30 metres to the south of the southern parcel. The village of East Halton is located to the west, with most residential properties sited along Townside Road, which runs broadly north to south. The nearest residential receptor is approximately 230 m west of the southern parcel boundary.

1.3.7 Agricultural land lies to the north, subject to extant permission PA/2009/0600 for development in places. To the east are further agricultural fields with the Humber Sea Terminal approximately 0.5 km east of these fields. The industrial landscape influence (power station, refinery and port infrastructure) contributes to the local baseline in respect of visual character, lighting and transport movements.

1.3.8 The northern land parcel extends to approximately 10.0 ha and is included within the red-line boundary for the sole purpose of ecological mitigation and enhancement (shown on drawing 1601-NPLUK-PS-BE01-DR-ED-0002) at approximately grid reference 514013 (Easting) and 423911(Northing).

1.3.9 The northern parcel will not accommodate any infrastructure associated with the development of the BESS. The northern land parcel consists of an agricultural field with the Humber Estuary directly east. A PRoW runs in a north-to-south direction directly adjacent to the eastern boundary and the Humber Estuary. To the north, west and south are further agricultural fields.

1.3.10 As part of the ecological proposals, a single purpose-designed Wildlife Tower (drawing no. 04B) will be provided to support barn owls and other species. Otherwise, the land will be carefully managed to provide suitable land for ecological mitigation and enhancement.

2 Proposed Development

2.1 Description of the Proposed Development

2.1.1 The proposed development consists of the installation of a battery storage facility, customer substation and associated infrastructure.

2.1.2 It is anticipated that the development will include the following:

- Acoustic fence (measuring up to 12 metres in height along the western and northern boundary);
- BESS units (measuring approximately 12.3m x 2.4mx 2.9m (LxWxH));
- PCS MV skid units (measuring approximately 12.3m x 2.4mx 2.9m (LxWxH));
- Electrical Switch units (measuring approximately 19.4m x 3.7m x4.1m (LxWxH));
- Customer substation (Transformer max height - 11m);
- Security fencing (2.4m height);
- CCTV columns (4m height); and

- Water tanks (1.9m height).

2.1.3 All construction vehicles will access the southern land parcel via the roundabout with Chase Hill Road / Eastfield Road. No construction vehicles will need to access the northern land parcel.

2.2 Construction Methodology

2.2.1 The construction work is likely to consist of:

- Ground preparation;
- Construction of temporary compound and fencing;
- Laying of concrete pads or similar piling foundation for each battery unit and substation and laying of aggregate/type 1 of the surrounding areas, this will involve the delivery of concrete and aggregate for the site area;
- Installation of battery units and associated substation infrastructure. The battery units will be pre-fabricated and will be delivered and installed on Site;
- Installation of fencing, access roads, gates and CCTV;
- Installation of emergency water tanks and drainage works.

2.2.2 Construction of the proposed development is programmed to commence as soon as appropriate consents are in place. It is envisaged that the construction period will take circa 18 months.

2.2.3 It is intended that the BESS element will be temporary and operate for a period of 40 years. After 40 years, the proposed infrastructure would be removed and the land restored.

3 The EIA Regulations

3.1 Request for a Screening Opinion

3.1.1 A formal screening opinion is being sought from North Lincolnshire Council to confirm that the Project comprises 'non-EIA development' as defined within the EIA Regs and, therefore, does not require an Environmental Statement. The EIA Regulations are applied to certain types of development that may have significant effects on the environment.

3.1.2 Different development types may be categorised in the EIA Regulations as Schedule 1 or Schedule 2 developments; dependent on a number of factors, including the nature of the proposals, their location and scale, which are all used to determine whether they are likely to have significant environmental effects.

3.2 Indicative EIA Screening Threshold

3.2.1 EIA development is defined within the EIA Regulations as development which is either:

"(a) Schedule 1 development; or

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

3.2.2 Schedule 1 developments require EIA in any event as they are highly likely to have a significant environmental impact. This Project is not listed under Schedule 1.

3.2.3 Schedule 2 developments constitute proposals that must be screened by the relevant Local Planning Authority to determine if significant effects are likely and ultimately if it is EIA development or not. Development of this type is defined within the EIA Regs as *"development, other than exempt development, of a description mentioned in column 1 of the table in Schedule 2 where –*

a) Any part of that development is to be carried out in a sensitive area; or

b) Any Applicable threshold or criterion in the corresponding part of column 2 of that table is respectively exceeded or met in relation to that development."

3.2.4 Schedule 2 developments do not automatically require EIA. An EIA is only required for a Schedule 2 development if it is 'screened in' on the grounds that it is likely to have significant effects on the environment due to factors such as size, nature, location and duration. If significant effects are not likely to arise as a result of the development, then the development must be 'screened out' and is therefore not classed as an EIA development.

3.2.5 BESS are explicitly not listed within Schedule 2 of the EIA Regulations, however, the proposed development could be defined under Schedule 2, description of development 3(a), which refers to:

"Industrial installations for the production of electricity, steam and hot water"

3.2.6 The application of this description of development is further confirmed in the Department for Business, Energy & Industrial Strategy's October 2019 publication 'Follow up consultation on proposals regarding the planning system for electricity storage' which states:

"We recognise that electricity storage is not expressly identified as a category of Schedule 1 development or Schedule 2 development within the existing legislation. However, as identified by consultees, the existing legislation does describe 'industrial installations for the production of electricity' to be a form of Schedule 2 development. In line with our view that electricity storage constitutes a form of generation, we consider that it will, in general, be appropriate to describe storage facilities in this way."

3.2.7 The Site is not located within land defined as a 'sensitive area' within the EIA Regulations.

3.2.8 As the Project is not sited within a sensitive area, the applicable thresholds and criteria need to be examined. The applicable thresholds for category 3(a) are "an area in excess of 0.5 ha". As the proposals exceed the 0.5 ha threshold, the development constitutes Schedule 2 development. However, it is for the relevant planning authority to determine whether, in their opinion, the proposals constitute EIA development or not.

3.2.9 In addition to the threshold stated in Column 2 of Schedule 2, guidance notes for screening thresholds provide further indicative criteria and key issues to considered when determining if a proposal is indeed EIA development. The guidance notes state the following indicative criteria and thresholds for category 3(a) of Schedule 2:

"Thermal output of more than 50 MW. Small stations using novel forms of generation should be considered carefully".

3.2.10 The key issues to consider for the same part are stated as:

"Level of emissions to air, arrangements for the transport of fuel and any visual impact".

3.2.11 During the operational phase of the Project, there will not be the generation of emissions to air, nor the transport of fuel. Visual impacts have been carefully considered and have to be considered within the context in which the Project is sited.

3.2.12 In summary, the Project could be considered to be Schedule 2 development under category 3(a). The Project exceeds 0.5 ha, and generation capacity will be 1,000 MW.

3.2.13 Despite this, the level of emissions to air and the transport of fuel will not be affected by these proposals. Visual impacts have also been carefully considered and mitigated as necessary. The proposals must be assessed as to whether this Project constitutes 'EIA development' or not. To aid in the review of the Project against relevant screening criteria, we have also considered it against Schedule 3 of the EIA Regulations in Section 4 below.

4 Considerations of the Potential Impacts

4.1 Environmental Considerations

4.1.1 The following sections consider the proposed Project against environmental topics and assess the likely significant effects.

4.1.2 The assessment below addresses the likely significant effects arising from the southern land parcel where the BESS development is to be sited.

4.1.3 As described elsewhere, the northern land parcel is included within the Project to provide ecological mitigation and enhancement. The only physical structure proposed in the northern land parcel is a single Wildlife Tower. No BESS containers, transformers, electrical infrastructure, permanent access roads, hardstanding, service trenches or drainage outfalls are proposed within this parcel. Works are limited to the construction of the tower and low-impact habitat creation (native planting and field margin management).

4.1.4 The screening concludes that the northern parcel will not give rise to likely significant environmental effects: the works are small in scale, of a non-industrial character, will not introduce operational emissions or additional traffic , and all plausible impact pathways (noise, dust, surface-water, traffic and visual effects) are either negligible in magnitude or readily mitigable by standard construction controls. On this basis, the northern parcel does not constitute EIA development. This conclusion is conditional on the project scope for the parcel remaining strictly limited to the works described above.

4.1.5 The follow section therefore considers the southern land parcel and the effects arising from the Project.

4.2 Natural Resources

4.2.1 The proposed development is not expected to use significant natural resources.

- **Land –** The BESS element of the site will be returned to its former condition.
- **Soil and minerals –** the site has not been identified for mineral extraction and is not within a mineral safeguarding area.
- **Water –** the proposed development would not use water throughout operation, but would have water tanks on site for emergency use only.
- **Materials –** the consumption of materials during construction and operation will follow best practice methods.

4.2.2 It is considered that the development will be built using relatively abundant resources such as concrete, stone and metal during construction.

4.3 Ecology and Ornithology

4.3.1 A Shadow Habitats Regulations Assessment (sHRA) has been prepared by Locogen Consulting Ltd to support the EIA Screening. The sHRA is supported by a Preliminary Ecological Appraisal (PEA) and an ongoing programme of wintering and migratory bird surveys. The sHRA conclusion is that no Appropriate Assessment is required is conditional on the survey evidence and the implementation of the avoidance and mitigation measures set out below.

4.3.2 A review of statutory ecological designations has been undertaken to inform the EIA Screening. The following ecological designations lie within 2 km of the southern land parcel (distances measured to the nearest boundary):

- The Humber Estuary RAMSAR is approximately 1.28 km east
- The Humber Estuary SSSI is approximately 1.53 km east
- The Humber Estuary SAC is approximately 1.53 km east
- The Humber Estuary SPA is approximately 1.28 km east
- The North Killingholme SSSI is approximately 1.28 km east.

4.3.3 These designations are associated primarily with intertidal habitats and internationally important assemblages of overwintering and passage birds, as set out in their respective site citations.

4.3.4 The Site is separated from the identified designated sites by the Humber Sea Terminal, a large-scale operational port and industrial complex of approximately 85 hectares which operates continuously (24 hours per day, 365 days per year) and includes extensive built development, hardstanding, vehicle movements and permanent operational lighting. This intervening land use represents a substantial physical and visual barrier between the Site and the designated areas.

4.3.5 This, combined with the distance, means that construction and operational uses of the site are not likely to cause significant or visual disturbance to species using the ecological designations.

4.3.6 On this basis, direct and indirect effects on the SSSI, SAC, SPA, and Ramsar sites are considered limited in magnitude and below the threshold for likely significant effects as defined under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended).

4.3.7 Development within the southern land parcel will require the removal of all areas of vegetation, scrubland and trees. Any clearance required would be undertaken in accordance with the relevant best practice guidelines. Mitigation (such as timing and the use of precautionary working methods) will be required to avoid impacts on species inhabiting these areas.

4.3.8 The northern parcel is included within the Project to deliver habitat compensation and ecological enhancement. To provide additional enhancement, a Wildlife Tower is proposed, which is designed to support a range of species, including nesting barn owl, roosting bats and other breeding birds.

4.3.9 Consequently, the proposed development does not constitute EIA development on the grounds of proximity to statutory nature conservation sites, and no further assessment is required beyond standard environmental management measures.

4.4 Archaeology and Cultural Heritage

4.4.1 A review of cultural heritage constraints has been undertaken to inform the EIA Screening, with consideration given to designated heritage assets, their settings, and the potential for below-ground archaeological remains within the southern land parcel.

4.4.2 The following statutory designated heritage assets are located within 1 km of the site (distances measured to the nearest boundary):

- Manor Farm Moated Site Scheduled Monument is approximately 0.55 km north-west of the site
- Baysgarth Farm Moated Site Scheduled Monument is approximately 0.45 km south-west of the site
- White Cottage is a Grade II structure approximately 0.9 km north-west of the site.
- Church of Saint Peter is a Grade I structure approximately 0.9 km south-west of the site.

4.4.3 The Project will not result in any direct physical impacts on designated heritage assets, as all identified assets are located outside the red-line boundary. Potential effects are therefore limited to indirect impacts, primarily relating to changes in the setting of designated assets and to disturbance of any unknown archaeological remains within the southern land parcel during construction.

4.4.4 In relation to setting, the southern land parcel is located on the periphery of an established industrial and port-related landscape characterised by large-scale infrastructure, existing development, hardstanding, lighting and operational activity. The Scheduled Monuments and listed buildings identified above are separated from the Site and are not located within the immediate visual envelope of the proposed development.

4.4.5 As such, the contribution that the southern land parcel makes to their significance through setting is considered low. Consequently, the proposed development is not expected to result in adverse effects to the significance of designated heritage assets through changes to their setting.

4.4.6 With regard to archaeology, the southern land parcel has the potential to contain currently unknown below-ground archaeological remains development. Construction activities, including excavation for foundations, cabling, drainage and services, represent the principal potential pathway for impact on any such remains.

4.4.7 Targeted trial trenching will be undertaken in advance of determination and in consultation with the LPA. The scope and methodology of the trial trenching will be agreed through a Written Scheme of Investigation (WSI) and will enable the presence, extent, character and significance of any archaeological remains to be established. The results will be used to refine the assessment of archaeological potential and, where necessary, to inform proportionate mitigation measures such as preservation in situ, design refinement or archaeological recording.

4.4.8 If required, a WSI detailing an archaeological watching brief during intrusive construction works, or other proportionate archaeological recording measures, can be conditioned to any granting of planning permission.

4.4.9 Standard construction-phase controls will also be implemented to limit any indirect effects on heritage assets, including restrictions on construction lighting, management of noise and vibration, and control of construction traffic, as set out within the Construction Environmental Management Plan (CEMP).

4.4.10 Subject to the implementation of the above mitigation measures, the Project is not expected to give rise to significant effects on cultural heritage assets, either in relation to the setting of designated heritage assets or archaeological remains. Any impacts on archaeological interest would be localised, temporary and reversible, and capable of being adequately mitigated through standard archaeological management procedures.

4.4.11 In summary, the Project is not expected to give rise to significant effects on cultural heritage, either in relation to archaeological potential or the setting of designated heritage assets. As such, cultural heritage is not considered likely to result in significant environmental effects.

4.5 Landscape and Visual Impacts

4.5.1 The Site is not subject to statutory landscape designations (for example National Parks or National Landscapes). The nearest National Landscape is the Lincolnshire Wolds, located in excess of 10 km to the south.

4.5.2 The Landscape and Visual Assessment (LVA) submitted with the planning application will consider both the existing baseline and a reasonably foreseeable future baseline that includes the implemented elements of planning permission PA/2009/0600 (and subsequent Section 73 modifications).

4.5.3 Permission PA/2009/0600 allows for built infrastructure such as estate roads, flood defences, railway siding, floodlighting and two 20 m telecommunications masts, together with extensive service and storage areas. The permission has been lawfully implemented and therefore represents a material change to the landscape context that is considered a reasonably foreseeable future baseline for assessment purposes.

4.5.4 The immediate context of the Site to the south and east is an industrialised landscape influenced by the Humber Sea Terminal, the Port of Immingham and the Hornsea 2 onshore substation located immediately south. Agricultural land remains in the wider locality to the north and west, albeit permission PA/2009/0600 establishes an accepted principle of industrialisation in the local landscape.

4.5.5 The LVA will assess effects on a defined set of receptors (residents, public rights of way users, road users, port/industrial receptors and landscape character receptors) using a representative viewpoint schedule. A Zone of Theoretical Visibility (ZTV), wireframes and photomontages will be prepared for key viewpoints to demonstrate actual and potential visibility and to inform magnitude judgments. The assessment will consider both the existing baseline and the future baseline with the extant permission implemented and will include cumulative effects arising from other committed developments.

4.5.6 No permanent lighting is proposed as part of the Project. The lighting columns proposed as part of the Project are infrared only. The only time lighting will be required once the Project is operational will be for ad-hoc maintenance.

4.5.7 The initial desk study exercise undertaken as part of the EIA Screening has identified no significant landscape or visual constraints. Therefore, given the location, context and nature of the Project, it is not anticipated that there will be significant adverse effects for the purposes of the EIA Regulations.

4.5.8 In reaching this conclusion the assessment has considered the Schedule 3 selection criteria (characteristics of the development, location and potential magnitude and significance of effects), the absence of statutory landscape designations within the immediate study area, the industrialised character of the local landscape, the implemented extant industrial consent which overlaps with the red line boundary, the

separation distances to the nearest sensitive receptors, and the limited scale, vertical extent and temporary nature of any construction activity.

4.6 Flood Risk and Drainage

4.6.1 A review of Environment Agency flood mapping indicates that the southern land parcel lies within Flood Zone 1 (low probability of fluvial/tidal flooding) and does not fall within Flood Zones 2 or 3.

4.6.2 Parts of the southern land parcel are, however, shown to be at risk of surface water (pluvial) flooding on the Environment Agency Risk of Flooding from Surface Water mapping. The areas at risk, their predicted depths and return-period probabilities will be confirmed in the site-specific Flood Risk Assessment (FRA) and Drainage Strategy modelling submitted with the planning application.

4.6.3 The Project will increase areas of engineered surfacing (customer substation, internal tracks and associated operational surfaces). The final design will seek to follow the SuDS hierarchy (infiltration where feasible and appropriate, then attenuation and discharge to an appropriate receiving waterbody at an agreed rate), with runoff rates attenuated to either greenfield rate or an acceptable restricted discharge rate agreed with the Lead Local Flood Authority.

4.6.4 A site-specific Flood Risk Assessment and detailed Drainage Strategy, prepared to current NPPF/PPG and Environment Agency guidance, will be provided to support the planning submission.

4.6.5 Battery incidents and firefighting can generate significant volumes of fire water. As part of the drainage strategy, fire water containment will be considered:

- Primary containment: dedicated underground retention tanks sized for the worst-case firefighting run-off.
- Controlled isolation: surface drains fitted with fail-safe penstocks so any fire water can be isolated from the port drainage/watercourse.
- Temporary storage: where necessary, controlled draining to a SUDS/retention pond providing minimum 7 hours storage under penstock control.
- Management & verification: subject to inspection and testing, fire water is discharged via the standard drainage outflow.

4.6.6 The southern parcel is located in Flood Zone 1 and with the identified surface water risks can be addressed through a site-specific Flood Risk Assessment and detailed Drainage Strategy to be submitted with the planning application. Provided the FRA demonstrates that runoff rates are attenuated (including appropriate climate change allowances), that surface water quality and contaminated firewater can be effectively contained and treated.

4.6.7 The screening conclusion is therefore that flood risk and drainage do not trigger EIA in their own right on condition that the FRA and Drainage Strategy are prepared to the standards listed above and that the recommended fire water containment and pollution prevention measures are implemented and legally secured.

4.7 Noise

4.7.1 Due to the nature of the project, noise will be an associated impact. Initial noise modelling has been undertaken to inform the maximum design parameters of the project to ensure there are no adverse effects upon residential receptors in East Halton. Subject to technical input

4.7.2 The operation of the proposed BESS would generate low levels of noise primarily associated with electrical equipment such as inverters, transformers, and air-conditioning or cooling fans. These elements are expected to operate continuously but at a consistent and relatively low sound power level. Equipment would be housed within enclosures designed to provide acoustic attenuation consistent with industry standards.

4.7.3 Construction activities would be of limited duration primarily involving site preparation, installation of foundations, and placement of prefabricated units. These works would be managed in accordance with standard construction environmental management practices to minimise noise impacts, including adherence to working hour restrictions set by the LPA.

4.7.4 On this basis, and with reference to the indicative criteria set out in BS 4142:2014+A1:2019 and guidance within the NPPF (2025), it is concluded that the proposed development would not give rise to likely significant effects in EIA terms.

4.8 Traffic and Transport

4.8.1 The proposed development is located within close proximity to the Port of Immingham, which is served by an established transport network specifically designed to accommodate frequent movements of large-scale industrial and energy-related infrastructure. The majority of heavy and oversized equipment associated with the proposed Battery Energy Storage System (BESS), including prefabricated containers and electrical plant, would be delivered via the Port of Immingham, thereby limiting the need for long-distance road-based haulage on the public highway.

4.8.2 The Site will be accessed via the spine road currently being delivered under an extant planning permission (as subsequently modified). From this access, connection to the wider strategic highway network is provided via Eastfield Road, which connects southwards to the A160. The A160 provides onward links to the A180 and the M180, forming the principal strategic road corridor serving the port and surrounding industrial area.

4.8.3 The construction phase is anticipated to last approximately 18months and will comprise site preparation, limited excavation and foundation works, followed by the delivery and installation of prefabricated BESS containers, transformers and associated electrical infrastructure. Construction traffic not arriving via the port is expected to consist primarily of light goods vehicles (LGVs) associated with the workforce, together with a limited number of heavy goods vehicles (HGVs) delivering construction materials and plant.

4.8.4 Peak construction activity is anticipated to generate a modest and temporary increase in daily vehicle movements, which would be small in scale relative to the existing baseline traffic associated with the Port of Immingham and surrounding industrial uses. Given the capacity and function of the surrounding highway network, these temporary movements are not expected to result in material effects on highway capacity, traffic flow or highway safety.

4.8.5 Once operational, the BESS facility will be fully automated and normally unmanned. Operational traffic will be limited to infrequent maintenance and inspection visits, typically comprising one to two staff vehicle trips per month. No routine HGV movements are anticipated during the operational phase.

4.8.6 To manage construction traffic and minimise disruption, a Construction Traffic Management Plan (CTMP) will be prepared and implemented prior to the commencement of construction works. The CTMP will include measures to control delivery timings, define approved vehicle routes, manage HGV and abnormal load movements (where required), provide on-site contractor parking, and coordinate construction traffic with existing port operations.

4.8.7 Taking account of the established transport infrastructure serving the Port of Immingham, the predominance of port-based deliveries, the temporary nature of construction traffic, and the very low level of operational trip generation, the proposed development is not expected to give rise to significant adverse effects on traffic conditions, highway safety, or the local or strategic highway network.

4.8.8 During the construction phase, traffic movements would be temporary, limited in number, and managed through a CTMP to minimise disruption.

4.8.9 On this basis, and in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended), traffic and transport effects are not considered likely to be significant. A detailed Transport Assessment is therefore not required for the purposes of EIA Screening, subject to the implementation of the CTMP during the construction phase.

4.9 Air Quality

4.9.1 North Lincolnshire Council (NLC) currently has one Air Quality Management Area (AQMA) declared within their administrative boundary. The AQMA is in Scunthorpe, covering part of the town and an area to the east of Scunthorpe, including the site of the steelworks. Scunthorpe AQMA is located in excess of 20 km west of the Site. In addition, a further AQMA is located in excess of 10 km north-west of the Proposed Development in Hull, outside of NLC's administrative area.

4.9.2 The EPUK / IAQM planning guidance for land-use planning and development control (January 2017) sets out a two-stage screening approach for determining the need for a detailed Air Quality Assessment (AQA). The Stage 1 and Stage 2 screening criteria have been applied to the proposed development.

4.9.3 The Stage 1 criterion advises that a development should proceed to Stage 2 screening where it comprises:

- 10 or more residential units or a site area of more than 0.5 ha residential use; and/or
- more than 1,000 m^2 of floor space for all other uses or a site area greater than 1 ha.

4.9.4 Stage 2 screening applies where any of the following additional characteristics are present:

- the development has more than 10 parking spaces; and/or
- the development will have a centralised energy facility or other centralised combustion process.

4.9.5 The proposed development does not meet the Stage 1 or Stage 2 thresholds. On that basis, and in accordance with the EPUK/IAQM screening guidance, a full AQA is not required for operational exhaust emissions. However, the screening also considers construction-phase dust and particulate pathways (demolition, earthworks, construction, and trackout) in accordance with IAQM construction dust guidance; this pathway screening is reported below. A Construction Environmental Management Plan (CEMP) will be prepared and implemented to ensure all effects are mitigated.

4.9.6 Battery Energy Storage Systems are electrically operated devices and do not produce combustion emissions or routine particulate emissions during normal operation; therefore the operational phase of the development is not expected to generate air quality impacts associated with vehicle exhausts or process emissions.

4.9.7 Following EPUK/IAQM screening and application of the above construction mitigations (to be secured in the CEMP), the proposed development is not anticipated to give rise to significant adverse effects on local air quality from operational emissions. Construction-

phase dust risks are considered manageable through implementation of the IAQM-based Dust Management Plan and routine monitoring; therefore no detailed AQA is required for the operational phase.

4.10 Land Stability and Climate

4.10.1 The Site and its surroundings are not known to be susceptible to earthquakes, subsidence, landslides, erosion or extreme weather conditions. The climate of the location is similar to the wider region. Adverse climatic conditions are estimated nationally by climate projections (UKCP). The nature of the development, to provide storage and backup services which allow for more intermittent renewable energy generation to be connected to the grid, is an ancillary development that supports the use of renewable energy and therefore, has a beneficial impact in relation to climate change.

4.11 Cumulative Effects

4.11.1 This section considers four nearby committed or proposed schemes and assesses whether in-combination (cumulative) effects with the Proposed Development are likely to raise the magnitude or significance of environmental effects such that the Proposed Development would need to be treated as EIA development.

- North Killingholme Power Project (NKPP) — a nationally significant infrastructure project (NSIP) consented in September 2014 and currently seeking non-material amendments; located approximately 140 m south-east of the Site.
- Humber Carbon Capture Pipeline (HCCP) — an NSIP at screening stage comprising an onshore CO_2 pipeline and associated above-ground infrastructure; the project's red line comes within c.200 m of the Site.
- Extant planning permission PA/2009/0600 — large-scale port-related industrial permission on land immediately adjacent to the Site (implemented elements form part of the reasonably foreseeable future baseline).
- Planning application PA/2025/1146 — a live, undetermined application for a low-carbon (green) hydrogen production facility (electrolyser up to 120 MW) on nearby land.

4.11.2 The Project's construction programme is currently estimated at 18 months. At the time of this screening the detailed construction programmes for the other projects are not known to the Applicant and may vary. On the information available, limited overlap of construction traffic and temporary construction activities is possible but not currently expected to be substantial or materially concurrent across all four projects.

4.11.3 This screening therefore proceeds on a precautionary but proportionate basis: it identifies plausible in-combination pathways and tests whether those pathways are capable, reasonably and predictably, of producing likely significant effects.

- Traffic and Transport: The largest credible in-combination pathway is concurrent peak construction traffic. However, the BESS construction trip generation is low and short-lived; combined peak traffic can be controlled by CTMPs, agreed routing, timing restrictions and coordination with other project teams . With these controls, a significant cumulative traffic impact is unlikely.
- Air Quality and Dust: Construction dust and temporary emissions are local and short-term; best practice mitigation (set within a detailed CEMP) and coordination of peak dusty activities will avoid significant additive exposure at sensitive receptors.
- Noise: Temporally concurrent noisy construction on multiple sites could elevate ambient levels locally, but any such effect would be temporary and manageable by

construction hours restrictions, plant selection and coordination. The BESS operational noise footprint is small; it does not introduce an additive ongoing noise source likely to be significant in combination.

- Ecology: The sites do not share a direct functional ecological link with the Humber Estuary designations; specialist habitats and statutory sites lie at distances such that cumulative disturbance from multiple projects is unlikely. Habitat creation on the northern parcel offsets local habitat loss and reduces cumulative habitat deficit risks.
- Landscape & visual: The extant consent and other industrial projects contribute to an industrialised context; the BESS is small in scale and its incremental visual effect within this context is minor. Cumulative landscape change to the degree of likely significant effect is not reasonably foreseeable.
- Water quality & firewater: Firewater/runoff is a consequential pathway; however, the BESS design includes site-specific firewater containment and the Drainage Strategy will be designed to ensure no increase in flood or pollution risk. Unless multiple adjacent projects simultaneously discharge contaminated run-off to a single receptor (a situation that would require specific coordination and likely be prevented by permit/agreements), significant cumulative water quality impacts are not predicted.

4.11.4 The conclusion that cumulative effects do not trigger EIA status is conditional on the following measures and commitments, which should be secured by condition or planning obligation and implemented in practice:

- Construction traffic coordination: the Applicant will prepare and implement a CTMP and will proactively coordinate with the port operator and other project developers to avoid concurrent peak abnormal loads.
- Standard mitigation measures: the CEMP will include Dust Management, Noise/ Vibration Management, Pollution Prevention (including containment of any potentially contaminated run-off), and ecology safeguards. These site controls will be required irrespective of other project activity.

4.11.5 Applying the Schedule 3 selection criteria and having regard to the limited scale and inherently low-impact operational profile of the Project, it is concluded that none of the identified nearby projects are reasonably likely to result in significant cumulative environmental effects that would require the Proposed Development to be treated as EIA development.

4.11.6 This conclusion is reached on the basis that the largest neighbouring schemes either form part of the existing or reasonably foreseeable baseline (PA/2009/0600, NKPP), are of a different project type with largely transient construction footprints (HCCP), the BESS's operation introduces no ongoing combustion emissions, minimal traffic and a small acoustic/visual footprint and the Applicant will implement the coordination and mitigation commitments above.

4.12 Transboundary Effects

4.12.1 No transboundary effects are expected.

4.13 Characteristics of the Potential Impacts

4.13.1 As outlined above, potential environmental, cultural and socio-economic impacts have been and will be considered through the design of this scheme. Through the early identification of these potential impacts and the formulation of effective mitigation

measures that will be considered and implemented, it has been demonstrated that these impacts are not significant in scale or nature. Indeed, through the implementation of mitigation measures, the potential for significant negative impacts to occur has been minimised considerably.

4.13.2 The potential magnitude and likelihood of any impacts caused by this development have been minimised as far as possible through the implementation of alternative design, mitigation measures and control protocols. As such, it is suggested that impacts have therefore been managed to a level which is not significant. Impacts would also be limited to within the Site and its immediate surroundings. In summary, it is considered that the types and characteristics of impacts from the proposed scheme would not constitute EIA development.

5 Conclusion

5.1.1 Having regard to the nature, scale and location of the Project, and having undertaken a systematic review of the environmental topics relevant to Schedule 3 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended), it is concluded that the Project does not constitute EIA development.

5.1.2 The Project is located within an established and evolving industrial context, including land subject to an extant and lawfully implemented permission for large-scale port-related and industrial uses. The characteristics of the development are such that it is of a type, scale and operational profile that is well understood, does not involve complex or hazardous processes, and does not give rise to effects of a nature or magnitude capable of reaching the threshold of "likely significant effects" as defined by the EIA Regulations.

5.1.3 In relation to ecology, a Preliminary Ecological Appraisal, ongoing bird surveys and a supporting shadow Habitats Regulations Assessment confirm that there are no pathways for significant effects on statutory nature conservation sites. Internationally and nationally designated sites associated with the Humber Estuary are physically separated from the Site by the Humber Sea Terminal and are located at distances which preclude disturbance, habitat loss or functional linkage. Potential effects are limited to localised habitat loss within the Site, which is capable of being mitigated and offset through standard construction controls and dedicated on-site ecological enhancement, including the northern land parcel. No likely significant effects arise, either alone or in combination.

5.1.4 In respect of landscape and visual effects, the Site is not subject to any statutory landscape designation and lies within a landscape already influenced by major industrial, port and energy infrastructure. The presence of an extant, lawfully implemented permission for large-scale industrial development represents a realistic and lawful future baseline and materially informs the assessment of sensitivity and magnitude of change. In this context, the Project would not give rise to effects of such scale, extent or duration as to reach the EIA significance threshold.

5.1.5 With regard to cultural heritage and archaeology, designated heritage assets are limited in number, are located at sufficient distance to avoid direct effects, and would not experience harm to their significance or setting. Archaeological risk is manageable and proportionate, with trial trenching proposed prior to determination to further inform the understanding of below-ground potential. Any effects would be localised, controllable and not significant in EIA terms.

5.1.6 In relation to traffic and transport, the Project benefits from direct access to an established transport network serving the Port of Immingham. Construction traffic would be temporary, low in volume and managed through a Construction Traffic Management Plan, while operational traffic would be negligible. No significant effects on highway capacity, safety or operation would arise.

5.1.7 With respect to noise, separation distances to residential receptors, the industrial context of the wider area and the ability to incorporate standard design mitigation ensure that operational and construction noise effects are limited, predictable and controllable. There is no reasonable likelihood of significant noise effects in EIA terms.

5.1.8 In terms of air quality, the Project would not generate emissions during operation and does not involve any combustion processes. Construction dust effects would be temporary and effectively controlled through standard best-practice mitigation. The development does not meet the thresholds requiring a detailed Air Quality Assessment and would not give rise to significant air quality effects.

5.1.9 Regarding flood risk and drainage, the southern land parcel lies outside Flood Zones 2 and 3, and while areas of surface water flood risk are identified, these can be effectively managed through a site-specific Flood Risk Assessment and Drainage Strategy. The development would incorporate controlled discharge, sustainable drainage and fire water containment measures, ensuring no increase in flood risk on- or off-site. Effects are therefore not significant in EIA terms.

5.1.10 Across all topic areas, potential effects are localised, short-term or reversible, and are readily mitigated through standard design, construction and operational controls. There are no complex interactions or cumulative effects which would elevate impacts to the level of likely significant effects.

5.1.11 Accordingly, having regard to the criteria set out in Schedule 3 of the EIA Regulations, it is concluded that the Project does not require Environmental Impact Assessment and that the submission of an Environmental Statement is not necessary.


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