
**THREE OAKS RENEWABLE
ENERGY PARK
EXTENSION**

**Environmental
Statement Appendix 1.3: ERoY Pre-
Application Response**

MAY 2026



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 Stephen Hunt Director of Planning and Development Management

Mr Jonny Murphy Noahs Ark Market Street Charlbury OX7 3PL	Your ref: Our ref: 25/10744/STPREP Enquiries: Mr Thomas Parker E-mail: thomas.parker@eastriding.gov.uk Date: 24 December2025
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Dear Mr Murphy,

Proposal:	Proposed extension to Three Oaks Renewable Energy Park consisting of 6no wind turbines of up to 149.9m in height above ground level and associated infrastructure
Location:	Thornholme Fields, Rudston Road, Burton Agnes, East Riding Of Yorkshire, YO25 4NE,
Applicant:	Mr Jonny Murphy
Application Type:	Major Pre-Application Enquiry

I write further to your pre-application enquiry received by this office on 7 August 2025 and my site visit on 27 August 2025 and can make the following comments:

Key Planning Policies and Documents

East Riding Local Plan Strategy Document Update (ERLP SDU)

Policy S1 Sustainable Development
 Policy S2 Addressing climate change
 Policy S4 Supporting development in Villages and the Countryside
 Policy S8 Connecting people and places
 Policy EC1 Supporting the growth and diversification of the East Riding economy
 Policy EC4 Enhancing sustainable transport
 Policy EC5 Supporting the renewable and low carbon energy sector
 Policy ENV1 Integrating high quality design
 Policy ENV2 Promoting a high quality landscape
 Policy ENV3 Valuing our heritage
 Policy ENV4 International, National and Local Sites of Importance for Biodiversity
 Policy ENV5 Enhancing biodiversity and geodiversity
 Policy ENV6 Managing environmental hazards
 Policy A2 Bridlington Coastal sub area

Other Relevant Documents

NPS EN-1 Overarching National Policy Statement for Energy
 NPS EN-3 National Policy Statement for Renewable Energy

Executive Director of Planning and Economic Regeneration

Background and History

The planning history of the enquiry site represents a material planning consideration. A summary of this is provided below.

On 19 December 2012, an application for planning permission (ref. 11/03999/STPLFE) for the erection of 6 no. wind turbines (1 x 110m high and 5 of a height 100m to tip) was refused at Planning Committee on the grounds of: unacceptable interference with radar at RAF Staxton Wold; impact on the surrounding landscape and living conditions, and; impact on the setting of a complex of designated heritage assets at Burton Agnes Hall. This application had been amended during the application process, including the omission of 3 of the originally-proposed 9 wind turbines. The decision to refuse planning permission was appealed and following a Public Inquiry, was allowed by the Inspector on 21 November 2013 based on the extensive public benefits the development have which would outweigh the harms identified in respect of landscape impact, living conditions (residential amenity) and heritage impact.

On 12 March 2013, the appeal was recovered for the Secretary of State's (SoS). In the decision letter dated 21 May 2014, the SoS disagreed with the Inspector's recommendation and accordingly dismissed the appeal on the grounds of landscape impact, heritage harm and living conditions. These are discussed in turn below.

- Landscape Impact

The decision letter at para 14 confirms that "The SoS, in his planning judgement, disagrees with the Inspector's assessment and considers that the landscape is particularly sensitive to wind turbine development as suggested by the East Riding Landscape Character Assessment. He concludes that the landscape would suffer harm through its sensitivity to wind turbine development."

Para 15 states "Although he agrees with the Inspector's finding that the proposal would not protect or enhance this valued landscape, he does not agree with the Inspector's conclusion in his planning balance that the proposal would only cause a limited degree of harm to the landscape. Whilst the Inspector considers that the harm caused would be temporary and reversible, the SoS has regard to the significant length of time over which harm would be experienced and that the 25 year duration proposed is long-term. Due to the reasons outlined above, and bearing in mind the site is particularly sensitive to wind farm development and that the scheme would not protect or enhance the landscape, the SoS considers the proposal would cause unacceptable harm to the local landscape and that this adverse impact should be given significant weight."

- Heritage impact

Para 17 of the SoS decision letter states that "The SoS has paid special attention to the desirability of preserving and enhancing the character and appearance of the Burton Agnes Conservation Area in accordance with Section 72(1). He agrees with the Inspector that the wind farm proposed would have a detrimental impact on the significance of that Conservation Area and the SoS has placed considerable weight and importance on the harm caused."

Para 18 states: "Although he agrees with the Inspector's finding that the significance of designated heritage assets would suffer 'less than substantial harm', he disagrees that the harm caused to the setting of the heritage assets, particularly in relation to Burton Agnes Hall, is 'limited'. This is because the turbines would be 'a distracting modern, discordant presence in views' from Burton Agnes Hall. The SoS shares English Heritage's view that the proposal would

cause harm to the setting of many heritage assets, including the Rudston Beacon and nearby associated barrows, single barrows at South Side Mount, Sands Wood, the site of the Rudston Cursus 'A', Woldgate itself which follows the course of a Roman Road that is believed to have followed the line of an earlier, prehistoric ridgeway, as well as the designated heritage assets in and around Burton Agnes Hall."

Para 19 concludes by stating: "In this case, where the harm is 'less than substantial' as set out in paragraph 134 of the NPPF, the harm to heritage assets needs to be weighed against the benefits of the proposal including securing its optimum viable use. The SoS concludes that the Inspector has placed less weight in the issue of harm in his overall balancing exercise than is required and the harm should be afforded considerable importance and weight."

- Living conditions

Para 20 of the SoS's decision letter states: "The SoS considers that more weight should be given to the potential deterioration in residential amenity at these properties. The SoS agrees with the Inspector that the turbines would not be uncomfortably close, overwhelming or oppressive, however due to the land rising to the north and the bases of the turbines being between 30 and 65m Above Ordnance Datum, the SoS considers that the turbines would appear more prominent than if there was no change in land level. For this reason, although he notes the Inspector's conclusion that the proposal, considered alone or in combination with other wind farms, built or permitted, would have no significant impact on the living conditions of local residents through visual impact, he considers that more weight should be given to the potential deterioration in living conditions at these properties."

Para 21 covers cumulative impact and states: "The SoS considers that more weight should be given to the harm caused to residential amenity because multiple wind farm sites would be able to be seen from dwellings in the area. The SoS is of the view that multiple wind farm sites would be seen from dwellings in the area. Having also considered illustrations and predicted views of the wind farm, he considers that the cumulative impact of the wind farms would have an adverse impact on local amenity."

The SoS decision letter summarises at para 24 by stating: "The SoS agrees with the Inspector's reasoning and conclusions on the concerns surrounding the consultation process, flooding and light pollution, highway issues, and other considerations including safety on the rights of way, ecology and the potential for expansion of the site. In addition, he considers that the appeal scheme would cause harm through impact on the landscape, heritage assets and living conditions, as well as some harm to tourism in the area. He has placed considerable importance and weight on the harm caused to heritage assets and the Conservation Area. He considers that by reason of visual impact, impact on residential amenity and the harm that could be caused to tourism, coupled with the failure of the scheme to preserve the setting of Burton Agnes Hall and other heritage assets, that together these factors clearly outweigh the need for the proposal and its wider economic benefits."

Para 25 of the decision letter concludes: "taking into account paragraph 98 of the Framework, the SoS considers that the impacts of the proposal are such that no condition imposed could make them acceptable. Taken together, he considers that the harm significantly and demonstrably outweighs the benefits when assessed against the policies in the Framework."

In summary, the SoS considers the weight to given by the Inspector to the identified harms as a result of the siting of 100m high turbines on the enquiry site to the local landscape character, heritage assets and living conditions of surrounding residential properties was insufficient. The SoS places significant weight on these harms in his planning balance and greater weight than that ascribed by the Inspector, with the conclusion that these harms when taken together significantly and demonstrably outweigh the benefits of the proposal. This SoS decision therefore represents the starting point for consideration of the proposed development for which advice is sought under this enquiry.

A material consideration is the difference between the dismissed scheme in 2014 and that proposed under this enquiry. The dismissed scheme consisted of 5 turbines at 100m to tip and 1 turbine at 110m to tip above ground level, whereas this enquiry seeks advice on the siting of 6 turbines up to 149.9m to tip. The rationale for this change/increase in height now sought is due to a change in technology through the passage of time, with onshore wind energy components growing in both efficiency and scale.

Principle of Development

The enquiry seeks advice in respect of the proposed erection of 6 no. wind turbines of up to 149.9m in height and associated infrastructure. The enquiry refers to advice being sought on a 'proposed extension to Three Oaks Renewable Energy Park'. This is understood to be a reference to the recently approved application (ref. 22/02777/STPLF) for the installation of ground-mounted solar panels, access tracks, inverters, transformers, substation, battery energy storage system and associated infrastructure, to the immediate south-east of the enquiry site.

- National planning policy position

There has been a change in national policy since the SoS decision letter issued in 2014. National planning policy now seeks to ensure that the planning system supports the strive towards sustainable development that will help to meet the Government's net zero targets for 2050 (para 161 of the NPPF). The Government is seeking to place onshore wind energy development on the same footing as other energy development in the NPPF.

Furthermore, para 168 of the NPPF sets out that when determining planning applications for all forms of renewable and low carbon energy developments and their associated infrastructure, Local Planning Authorities should: a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal's contribution to a net zero future; b) recognise that small-scale and community-led projects provide a valuable contribution to cutting greenhouse gas emissions; and c) in the case of applications for the repowering and life-extension of existing renewable sites, give significant weight to the benefits of utilising an established site. National Policy Statements EN-1 and EN-3 also provide a further national policy backdrop for energy development and renewable forms of energy generation.

It is therefore reasonable to conclude that significant weight is given to the sustainability benefits of developments for renewable sources of energy generation, such as onshore wind development, when assessing against national planning policy.

- Local planning policy position

The policies contained within the East Riding Local Plan Strategy Document Update (ERLP SDU), adopted 2 April 2025, represents the Development Plan against which such a proposal would be assessed against.

Policies S1 and S2 of the ERLP SD set out the overarching principle of supporting sustainable development in the East Riding through supporting proposals that would help to address climate change and promote the creation of economic clusters for the renewable and low carbon energy sector (S2, part F). Part D.11 of policy S4 of the ERLP SD sets out that proposals for energy development and associated infrastructure located in the Countryside will be supported where these respect the intrinsic character of their surroundings. Policy EC1 (part A.2) seeks to support proposals that would strengthen and develop the East Riding's key employment sectors and clusters, including renewable and low carbon energy.

Policy EC5 of the ERLP SD, which aligns with the NPPF in setting out the policy position in the East Riding for renewable and low carbon energy development of the type proposed. Part A offers support to proposals for the development of the energy sector where any significant

adverse impacts are addressed satisfactorily, and the residual harm is outweighed by the wider benefits of the proposal. Developments and their associated infrastructure are expected to be acceptable in terms of:

- A.1 the cumulative impact of the proposal with other existing and proposed energy sector developments;
- A.2 the character and sensitivity of landscapes to accommodate energy development, with particular consideration to the identified Important Landscape Areas, and specifically for onshore wind energy developments, the Wind Energy Landscape Sensitivity Strategy;
- A.3 sets out other material planning considerations which any energy sector development proposal should be acceptable in respect of, including local amenity (including noise, air and water quality, traffic, vibration, dust, light, reflection, glint, glare, and shadow flicker), biodiversity geodiversity and nature, the historic environment (including individual and groups of heritage assets), telecommunications and other networks, transport (including capacity of the road network to accommodate development), risk of flooding, and the land (including land stability, contamination, best and most versatile agricultural land and soil resources).

In summary, whilst the provision of sustainable renewable energy generation through the siting of wind turbines would bring about tangible economic and environmental benefits that would be given great weight in the planning balance, the LPA consider the harms identified by the SoS, to the local landscape character, heritage assets and living conditions would still remain and as noted by the SoS, these harms would significantly and demonstrably outweigh the benefits. Furthermore, the LPA do not consider there are any new material considerations which would tip the balance in favour of a scheme for 6 wind turbines at an increased height of 149.9m. Further detailed discussion of these matters are set out below.

Design and Landscape Impact

As discussed above and by the SoS, the enquiry site resides within an area that is susceptible to harm by new development, being situated within the designated Important Landscape Area for the Yorkshire Wolds in the East Riding Local Plan Update.

In addition to policy EC5 of the ERLP SD, the updated Landscape Character Assessment provides an appraisal of the capacity for onshore wind energy development across the East Riding. This is set out in detail at Figure 11 of the ERLP SD, whereby the enquiry site resides within an area highlighted as being subject to *Significant Constraint*. In contrast, the consented schemes at Lissett and Fraithorpe lie within areas identified to have lesser sensitivity to onshore wind (*Potential Constraint*) in Figure 11. Para 6.86 provides further reference to the need to consider cumulative impacts of onshore wind energy, for both consented and proposed schemes.

The vast openness of the surrounding south-facing slope of this section of the Yorkshire Wolds renders the enquiry site highly susceptible to harm, particularly from new vertical structures that would represent a striking addition to the surrounding countryside aesthetic.

No LVIA has been submitted as part of this enquiry, however an indicative methodology and viewpoints have been provided which are intended to inform a full Landscape Visual Impact Assessment (LVIA) at full application stage. The Council's landscape consultant has been consulted on these documents and their response to the enquiry is included in the email attachments. In brief, commentary is provided on the chosen viewpoints and methodology, as well as reference to ensure that the full LVIA considers nighttime effects, ancillary features such as telemetry masts, hardstanding, access tracks and transformers, and the resolution/compression of visualisation images to aid comprehension of effects.

A key focus of the landscape consultant's response to the enquiry is the need to ensure cumulative effects of the proposed turbines and the consented solar farm are taken into consideration. Indeed, discussions during the site visit turned to this matter, following the visit to

the viewpoint in Haisthorpe village looking west towards the enquiry site. The proposal would be immediately adjacent to the aforementioned solar farm to the immediate south-east of the site (approved under ref. 22/02777/STPLF) and this consented development represents a significant addition to the surrounding landscape, particularly considering the scale of the site compared to the modest size of Haisthorpe and the surrounding villages and the relatively undeveloped, agriculturally dominated open-sky landscapes of the south-facing slopes of the Yorkshire Wolds. The landscape consultant emphasises the importance of any LVIA including an assessment of cumulative effects. Please see attached response.

In respect of landscape impact and cumulative effects, one point of note is the change in the wider landscape across the relevant Landscape Character Areas at issue, with the advent of the Fraisthorpe wind farm since the time of the previous application's decision being reached by the SoS. This subsequent consent for the erection of 9 no. wind turbines of 80m hub height and 130m tip height (allowed at appeal following the refusal of application ref. 12/00640/STPLFE) has undoubtedly changed the character and aesthetic of its host and adjacent Landscape Character Types, LCT20C *Bridlington to Hornsea coast* and LCT19C *North Holderness Open Farmland*, respectively. This is reflected in the update to the Council's Landscape Character Assessment in 2018. Regard should be given to the presence of the Fraisthorpe wind farm in respect of wider visual impacts and impacts upon living conditions of the residents of Thornholme, Haisthorpe and surrounding villages, whom at the Public Inquiry attested they were 'surrounded and hemmed in by wind farms'. The enquiry proposal would likely exacerbate this issue by being situated a lot closer to the aforementioned villages than the consented schemes at Lissett (approved under application ref. 06/05618/STPLFE for 12 turbines of 80m hub height and 120m tip height), Carnaby (approved under application ref. 10/04753/STPLFE for 2 turbines of 80m hub height and 120m tip height, unconstructed but extant) and Fraisthorpe.

In summary, LPA pose the question, what has changed between the historic decision and the proposed development that mitigates the aforementioned harm to the surrounding landscape, given significant weight in the SoS's decision, and the increased impact arising from the additional tip height of the turbines proposed? In the absence of any additional supporting information, such as a Landscape and Visual Impact Assessment (LVIA), it is considered unlikely that the harm the proposal would give rise to could be satisfactorily mitigated in terms of landscape impacts to be significantly and demonstrably outweighed by the benefits of the scheme.

Heritage Impact

Policy ENV3 (part B) of the ERLP SD is consistent with the relevant provisions of the NPPF in regard to the determination of proposals that would affect designated heritage assets. Para 212 of the NPPF sets out that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use (para 215 of the NPPF).

With reference to the planning history of the enquiry site, it is well established that the site is highly sensitive from a historic perspective. This sensitivity is derived from the designated heritage assets within the complex of the 17th century Elizabethan hall of Burton Agnes Hall, including listed structures and buildings, ha-ha walls, southern walled gardens and gatehouses of varying listed stature (Grade I, II* and II), the Grade I Listed St Martin's Church, Grade II Listed Old Rectory, and the extent of Burton Agnes Conservation Area. The SoS made reference in his decision to additional designated heritage assets within the area at risk from harm, as set out above.

The Council's Conservation Officer has highlighted the importance of a comprehensive Heritage Impact Assessment being submitted alongside any formal application, which should take account of the interrelationship of the existing historic environment and the proposed modern

development, which the SoS cited as being 'a distracting modern, discordant presence' in views from Burton Agnes Hall. The Conservation Officer highlights that the development would not be visible in views from within the gardens, above the ha-ha or from the first floor library windows of the Hall, however in the absence of detailed supporting information including an LVIA to demonstrate this, this would need to be verified by way of a site visit at Burton Agnes Hall itself, ideally alongside the pre-arrangement of height markers such as a balloon or crane, as suggested, to aid appreciation of the impact of the turbines, however it should be noted that visibility from the Hall would not represent the only source of historic harm.

Crucially, in order to arrive at a different outcome from the previous decision reached by the SoS, it must be clearly demonstrated what has changed between the previous iteration and the proposals set out in this enquiry. In the absence of additional supporting information for this enquiry, such as a Heritage Impact Assessment, it is not considered that there has been any change that would result in the aforementioned less than substantial harm being outweighed by the public benefits of the scheme, therefore there would remain significant concerns with the proposal over heritage impact.

The Humber Archaeology Partnership have also been consulted on this enquiry, their comments are included in the email attachment. The need for a geophysical survey of the site following initial desk-based assessments is highlighted, this could be dealt with through a Written Scheme of Investigation that would usually be subject to a pre-commencement condition in the event of consent being granted.

Residential Amenity

Policy ENV1 (part B.4) of the ERLP SD requires development to achieve a high quality of design which optimises the potential of the site and contributes to a sense of place and beauty by having regard to the amenity of existing or proposed properties. This is consistent with para 135(f) of the NPPF. There are multiple sensitive residential receptors within close proximity to the enquiry site, including in the villages of Haisthorpe and Thornholme and further afield in Carnaby and Burton Agnes.

The SoS gave greater weight to the harm identified upon the living conditions of the residents of nearby residential properties than the Inspector did at appeal, due to the change in land level that warranted greater consideration of the potential deterioration in residential amenity of these properties due to the impacts of the proposal. In addition, the SoS also placed great weight on the cumulative impact the proposal would have given rise to as a result of the visibility of multiple wind farms (at Lissett, Fraisthorpe and that at issue) from dwellings in the area. Illustrations and predicted views also helped to inform his assessment whereby the cumulative impact of the wind farms was considered to have an adverse impact on local amenity.

In order to arrive at a different outcome from the previous decision reached by the SoS, it must be clearly demonstrated what has changed between the previous iteration of the scheme and the proposal at issue with this enquiry. In the absence of additional supporting information for this enquiry, such as an LVIA, Noise Impact Assessment or shadow/flicker report, it is considered the proposal would be unlikely to address the impact and harms identified by the SoS, where these were given great weight in the planning balance and considered to contribute towards the SoS's decision.

Impacts on living conditions from wind turbines can take numerous forms: noise, air and water quality, dust, vibration, disturbance, vehicular movements, construction hours, shadow flicker, glint, glare, ice throw and amplitude modulation. Sufficient supporting information in respect of these matters must be submitted alongside any application for permission in order to ascertain whether any residual harm can be mitigated for and/or outweighed by the benefits of granting permission.

The Council's Environmental Control team have been consulted in respect of this enquiry and, following discussions with the acoustician associated with the project, have provided

commentary on background noise levels, the need for a Noise Impact Assessment, the importance of ensuring noise monitoring locations are selected holistically, the construction phase of the development, and external lighting schemes.

Again, as with the above matters discussed by the SoS regarding the principle of wind turbines in this location giving rise to harm to visual amenity and the historic environment, any formal application would need to demonstrate what changes have taken place in respect of the proposal at issue, as to how the aforementioned harm to living conditions is proposed to be mitigated, such that any residual residential amenity harm can be sufficiently outweighed by the benefits of the scheme.

Highway Safety and Access

Policy EC4 of the ERLP SD set out that development proposals should seek to enhance sustainable transport by ensuring these are made accessible, or can be made accessible, by sustainable modes of transport and address their likely transport impacts. This aligns with the NPPF at para 116, 117 and 188. Access for the proposal is understood to be taken from the A614 via the use of an existing field access track to be upgraded.

The Council's Transport Planning team have been consulted on this enquiry and their comments are included in the accompanying email attachment. In brief, it is highlighted that highway improvements would be required in order to facilitate the safe access and egress into the site with respect to the construction phase of the proposal. To this end, a Construction Traffic Management Plan (CTMP) and a Transport Statement (TS) would be required to be submitted for consideration at application stage. Parking provision would also be necessary to ensure that there is sufficient space within the various sections of the site for vehicles to enter and leave in a forward gear back onto the A614, from which it is understood access would be taken. Highway impacts are anticipated to be predominantly as a result of the construction and decommissioning phase, with limited maintenance visits required during the operational phase.

Comments are also provided in respect of S184, S278 works, highway maintenance, abnormal loads considerations, liaison with National Highways, stopping-up orders and EV parking.

Subject to the above additional information being provided at application stage for consideration, it is anticipated that a development proposal with an acceptable impact from a highway safety perspective could be achieved.

Biodiversity

Policies ENV4 and ENV5 of the ERLP SD provide the basis for assessment of development proposals in respect of ensuring these have regard to the importance of international, national and local sites of ecological value, and the need to enhance biodiversity and geodiversity.

The enquiry site comprises agricultural fields with features of likely ecological value surrounding the site, including ditches, hedgerows and trees. The Council's Natural Environment team have been consulted on this enquiry and their detailed comments are included in the email attachment. They refer to the need to consider impacts of the proposal on protected species that may be found in these ecological features, with nearby UK Biodiversity Action Plan priority habitats of 'deciduous woodland' and 'wood-pasture and parkland' close by to the enquiry site. Commentary is provided on Biodiversity Net Gain, with the proposal likely to be subject to mandatory net gain requirements requiring a minimum of 10% uplift in ecological value on the site compared to the baseline surveys. Dependent on the scale of off-site enhancement should on-site gains not be achievable to reach this 10% minimum uplift, a legal agreement may be required to cover the fee of monitoring these enhancements which should be included within a draft Habitat Management and Monitoring Plan (HMMP).

An Ecological Assessment report should also be produced in order to ensure that potential constraints to the proposal have been assessed and considered. This should include an Extended Phase 1 Habitat survey, the results of which would inform whether further species

specific surveys to be undertaken within optimal survey periods would be required on the site for the proposal. Risk assessments for the hazards of the erection of turbines within bird flight paths should be provided and included within the above report, given the prospect of collisions from birds and airborne fauna such as bats from the northern side of the Woldgate ridge. Reference is made for the need to consider the additional considerations that should be taken into account when assessing impacts from the proposed 6 turbines, particularly against the matters considered for the consented solar farm under ref. 22/02777/STPLF.

It is also highlighted that a Construction Environmental Management Plan (CEMP) and a Biodiversity Enhancement Management Plan (BEMP) should be submitted for consideration as part of a formal application. Additional mitigative landscaping should be incorporated into the latter, with details showing how planting proposals can be incorporated into the scheme for ecological and landscape requirements, for instance by creating viable wildlife corridors that would provide a suitable habitat and food source for many different species. Any hedgerow or tree loss would also need to be mitigated. The absence of trees within the field parcels proposed to host the individual turbine compounds is acknowledged, however associated works including improvement and provision of the access road is likely to lead to some hedgerow and tree losses. In addition to this, commentary is also provided on nesting birds and lighting impacts.

Flood Risk and Drainage

Policy ENV6 of the ERLP SD is consistent with the NPPF insofar as it seeks to ensure that environmental risks such as flooding and groundwater pollution are managed to ensure that development does not result in unacceptable consequences to its users, the wider community and the environment. With the exception of a narrow stretch of hillside in Flood Zone 3a where a spring reaches the surface and flows southwards towards the A614 to the south-west of the site, the majority of the enquiry site resides within Flood Zone 1 of the EA flood risk maps and is therefore subject to a low risk of flooding. The Sequential Test and Exception Test are not therefore required to be engaged, however a site-specific Flood Risk Assessment would be required in order to detail how the development could be made safe from flooding throughout its lifetime, and to confirm that flood risk would not be increased elsewhere.

Topography across the site would have an impact on drainage. Full details of surface water management arising from the proposed areas of additional hardstanding across the site would need to be submitted in order to ensure that this can be managed satisfactorily and appropriately, in accordance with the established drainage hierarchy. A key consideration would be to ensure that debris and surface water does not end up on the roadway of the A614 as a result of the proposed works, both within the site and in improving/upgrading the highway access into the site, however the latter element presents the opportunity to install sustainable means of surface water drainage. The Council's Land Drainage and LLFA teams have been consulted on this enquiry and their comments are included in the email attachment.

Public Rights of Way

There are a number of Public Rights of Way (PROW) near to or adjacent to the site, including to the north and south off Woldgate and the A614 respectively. The Council's Countryside Access team have been consulted on this enquiry and have cited their standard requirement for a separation distance from wind turbines to usable routes surrounding the site of twice the maximum height of the turbines themselves, however the site constraints are acknowledged for this site and therefore this requirement has been halved to the maximum height of the turbines.

Other Matters

Any application for planning permission would also need to take into consideration the impacts of the proposed development in respect of telecommunications, both in respect of television/radio disturbance and disruption to mobile phone networks. In addition, aspects in respect of aviation and existing infrastructure would require consideration. The relevant external consultees including the MOD and Civil Aviation Authority would be consulted as standard as part of any application.

It is noted that the enquiry proposal overlaps the consented solar farm scheme (ref. 22/02777/STPLF), as confirmed by Figure 3 of the submitted Pre App Consultation Report. Confirmation as to how this would be achieved would be required; the siting of the south-easternmost wind turbine is shown to be within the consented solar farm. The implications of this in respect of procedural matters relating to this extant permission and the proposed application for the 6 wind turbines, as well as in-situ impacts in terms of noise, air and water quality, biodiversity, highway safety and visual amenity impacts would also need further considerations and provided at application stage. The compatibility of the two land uses also requires consideration, how would the operation of the wind turbines if consented affect the operation/efficiency of the solar panels, would there be public health/safety implications due to ice throw from the turbine blades onto the panels?

Summary

The enquiry proposal would represent a significant addition to the largely undeveloped landscape of the Yorkshire Wolds between Thornholme and Haisthorpe, which by virtue of its vastly towering height, would have greater impacts across a wide-spread area of the north-eastern corner of the East Riding. The site is within a highly sensitive area in respect of landscape character and the historic environment, with both being highly susceptible to harm from development that would represent a distracting modern discordant presence in the landscape, such as that proposed.

Commentary is provided on these key matters, including living conditions / residential amenity, in addition to the impacts upon the character of the area and historic environment. Consideration would also need to be given to other matters, including highway safety, flood risk and drainage, biodiversity, archaeology, telecommunications and Public Rights of Way.

In conclusion, whilst the provision of sustainable renewable energy generation through the siting of wind turbines would bring about economic and environmental benefits that would be given great weight in the planning balance, the LPA consider the harms identified by the SoS, to the local landscape character, heritage assets and living conditions would still remain and as noted by the SoS, these harms would significantly and demonstrably outweigh the benefits. Furthermore, the LPA do not consider there are any new material considerations which would tip the balance in favour of a scheme for 6 wind turbines at an increased height of 149.9m.

Notwithstanding this advice, please see the attached documents which sets out the key Development Plan policies that are of relevance, and what would be required should you choose to submit an application for the proposed development.

Please be aware that on submission of a formal application for planning permission, following validation of the application, amendments to planning applications will only be submitted where they meet the criteria specified below, and are received in sufficient time so as not to delay a decision beyond the statutory target date. Acceptance of amendments is at the discretion of the Planning Officer, based on their assessment of the proposal and the decision making timescales. We will request and accept simple amendments where a scheme is unacceptable as submitted but can be made acceptable subject to very minor amendments.

We will not accept amendments where the scheme is unacceptable and;

- making it acceptable would require a large amount of additional information
- making it acceptable would need further amendments that may require further consultation
- the amount of change required would result in a very different proposal
- the principle of development cannot be supported
- no initial planning advice has been sought

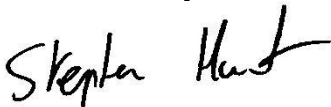
You would be advised to check in principle whether any amendments will be acceptable before incurring the expense of preparing amended plans.

You may also need permission under the Building Regulations. Local Authority Building Control is wholly independent, non-profit making service that operates only to protect and look after your interests. The service operates from regional offices in Beverley, Bridlington and Goole so help and advice is always available and enables us to offer same day inspections for requests made prior to 10am. All the details of the Building Regulation Approval service, and the relevant application forms, are available at <https://www.eastriding.gov.uk/buildingcontrolservices/>. You can also contact Building Control at building.control@eastriding.gov.uk or by calling the Building Control helpdesk on 01482 393800.

Please note that while every effort is made to ensure that the advice given is as accurate as possible, I must advise you that the contents of this letter are the informal opinion of an Officer and cannot prejudice the outcome of a formal application for planning permission. Planning applications are subject to consultation processes and any responses have to be taken into consideration prior to a decision being made.

Please also note that in the interests of transparent decision making, if you progress to make a planning application for this proposal then this pre-application advice will be made available by the Council in the public domain.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Stephen Hunt', with a stylized flourish at the end.

Stephen Hunt MRTPI
Director of Planning and Development Management

Advice for 25/10744/STPREP

Key Development Plan Policies	
These are the key local plan policies against which your application will be considered. Your proposal will also be considered against guidance in the NPPF and the Planning Practice Guidance. You can view the Local Plan in the councils website at https://www.eastriding.gov.uk/planning-permission-and-building-control/planning-policy-and-the-local-plan/	East Riding Local Plan Strategy Document Update S1 Sustainable Development S2 Addressing climate change S4 Supporting development in Villages and the Countryside S8 Connecting people and places EC1 Supporting the growth and diversification of the East Riding economy EC4 Enhancing sustainable transport EC5 Supporting the renewable and low carbon energy sector ENV1 Integrating high quality design ENV2 Promoting a high quality landscape ENV3 Valuing our heritage ENV4 International, National and Local Sites of Importance for Biodiversity ENV5 Enhancing biodiversity and geodiversity ENV6 Managing environmental hazards A2 Bridlington Coastal sub area Other Relevant Documents NPS EN-1 Overarching National Policy Statement for Energy NPS EN-3 National Policy Statement for Renewable Energy Wind Turbine Sensitivity and Capacity Study (November 2018) Landscape Character Assessment Sustainable Transport SPD Burton Agnes Conservation Area Appraisal

Validation Requirements	
These are the items from the Council's Local List that you need to submit with your application for it to be registered as a valid application. These are in addition to the national requirements (application form, certificates, fees and plans). You can find more guidance on each of these requirements in the Validation Checklist which is available on the Council's website at https://www.eastriding.gov.uk/planning-permission-and-building-control/applications-for-planning-and-building-control/householder-planning-and-building-control/	Local List validation requirements Biodiversity Enhancement Management Plan (BEMP) Construction Environmental Management Plan (CEMP) Construction Method Statement (CMS) Construction Traffic Management Plan (CTMP) Decommissioning Plan Drainage Schedule Environmental Statement (ES) Habitat Management and Monitoring Plan (HMMP) Heritage Impact Assessment (HIA) Landscape Visual Impact Assessment (LVIA) Lighting Schedule Noise Impact Assessment (NIA) Shadow Flicker survey Site-specific Flood Risk Assessment (FRA) Transport Statement (TS) Written Scheme of Investigation (WSI)

[applications/applying-for-planning-permission-and-prior-approvals/](#)

Fees can be calculated on the Planning Portal at
<https://1app.planningportal.co.uk/FeeCalculator/Standalone?region=1>

Kate Wylie

From: Invest Eastyorkshire
Sent: 28 August 2025 15:59
To: Planning
Subject: RE: Planning Consultation for 25/10744/STPREP Thornholme Fields Rudston Road Burton Agnes East Riding Of Yorkshire YO25 4NE

This application is supported from an Economic Development perspective. The government are committed to doubling onshore wind energy by 2030 and an extension to the renewable energy park supports this ambition.

The project comes with an increased community fund which runs over the lifetime of the project and could provide an energy rebate for properties surrounding the wind farm, along with a contribution to local projects and initiatives.

Inward Investment Team

Web: <https://eur01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.investeastyorkshire.co.uk%2F&data=05%7C02%7Cplanning%40eastriding.gov.uk%7C32daf41b9c25458528ac08dde6436972%7C351368d19b5a4c8bac76f39b4c7dd76c%7C1%7C0%7C638919899424734676%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIlwLjAuMDAwMCIsIlAiOiJXaW4zMtIsIkFOljoiTWFpbGlldUljoyfQ%3D%3D%7C0%7C%7C%7C&sdata=Q4d9CyhNDvF105B%2BpIlVD3bYwfS7KIOmjEWTWbpQnzE%3D&reserved=0>

Twitter: @InvestEastYorks

Facebook: <https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.facebook.com%2Finvesteastyorkshire&data=05%7C02%7Cplanning%40eastriding.gov.uk%7C32daf41b9c25458528ac08dde6436972%7C351368d19b5a4c8bac76f39b4c7dd76c%7C1%7C0%7C638919899424778498%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIlwLjAuMDAwMCIsIlAiOiJXaW4zMtIsIkFOljoiTWFpbGlldUljoyfQ%3D%3D%7C0%7C%7C%7C&sdata=hUvzzcydoP%2FRzFdjxoo7gCtBlZ9m2sldzMW7tIGTmtE%3D&reserved=0>

-----Original Message-----

From: planning@eastriding.gov.uk <planning@eastriding.gov.uk>

Sent: 14 August 2025 08:53

To: Invest Eastyorkshire <Invest.Eastyorkshire@eastriding.gov.uk>

Subject: Planning Consultation for 25/10744/STPREP Thornholme Fields Rudston Road Burton Agnes East Riding Of Yorkshire YO25 4NE

Planning Consultation for 25/10744/STPREP Thornholme Fields Rudston Road Burton Agnes East Riding Of Yorkshire YO25 4NE

Consultation on Pre application enquiry

Planning and Development Management

County Hall

Beverley

<https://eur01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.eastriding.gov.uk%2F&data=05%7C02%7Cplanning%40eastriding.gov.uk%7C32daf41b9c25458528ac08dde6436972%7C351368d19b5a4c8bac76f39b4c7dd76c%7C1%7C0%7C638919899424796894%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIlwLjAuMDAwMCIsIlAiOiJXaW4zMtIsIkFOljoiTWFpbGlldUljoyfQ%3D%3D%7C0%7C%7C%7C&sdata=Q7y%2B99MoJgtcJ1fkXtOfxVN6iSrDYbCfbdsLrHkRcpc%3D&reserved=0>
planning@eastriding.gov.uk

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Humber Historic Environment Record

Archaeological advisor to the East Riding
of Yorkshire Council and Hull City
Council.

Mr Thomas Parker
Planning and Economic Regeneration
County Hall
Beverley
East Riding of Yorkshire
HU17 9BA

Our ref. HER/DE/CONS/31145
Your ref. 25/10744/STPREP
Enquiries James Goodyear
Email james.goodyear@hullcc.gov.uk
Date 03 September 2025

Please quote our reference on all correspondence

Dear Mr Parker,

Re: Proposed extension to Three Oaks Renewable Energy Park consisting of 6no wind turbines of up to 149.9m in height above ground level and associated infrastructure, at Thornholme Fields, Rudston Road, Burton Agnes (application number: 25/10744/STPREP).

Thank you for the opportunity to comment on the above application.

The site of the proposed development lies within an extremely important archaeological landscape, with extensive remains from the prehistoric and Romano-British periods recorded within the proposal site itself. These remains include trackways, pits, ring ditches, field systems and enclosures; these form part of a much wider landscape of activity extending for many kilometres that represent settlement, land organisation/movement and funerary practices. Therefore, due to the potential significance of the archaeological remains within the proposal site, we would expect to see a staged programme of archaeological assessment undertaken in order that the potential impact of the development on the archaeological resource can be adequately assessed.

The principles of dealing with archaeological matters as part of the planning process are outlined within the National Planning Policy Framework, Section 16, 'Conserving and enhancing the historic environment' (Dept. of Communities & Local Government, 2024). It is standard procedure, when a development is thought to coincide with an area of archaeological interest, for the Local Planning Authority to ensure that the archaeological implications of that development have been considered, addressed and that any potential remains are adequately preserved.

The preservation of the archaeological remains could take two forms; physical/in-situ preservation (to preserve the archaeological remains below the development or by leaving the site un-developed), or preservation by record where destruction is unavoidable (to include full and detailed excavation followed by post excavation analysis and publication

**Humber Historic Environment Record, Humber Archaeology Partnership, The Old
School, Northumberland Avenue, Hull HU2 0LN**

of results). This procedure is in line with the historic environment policies set out within Section 16 of the National Planning Policy Framework 2024 and the East Riding Local Plan, Policy ENV3, Update April 2025.

A suitable staged scheme to preserve or record the archaeological remains should include the following provisions:

- An initial desk-based assessment that includes a study area extending to 1km radius for non-designated heritage assets, and a 2.5km radius for designated assets.
- A staged scheme of archaeological evaluation, which should begin with a geophysical survey and be followed by a programme of trial trenching will then be undertaken if required.
- When the archaeological potential of the site has been adequately assessed, suitable mitigation strategies will be discussed, if these are required.

In the meantime, I hope that the above provides you with an indication of the archaeological implications of the development within the enquiry area. If you require any further clarification or advice on the above, please do not hesitate to contact me.

Yours sincerely,

James Goodyear
Development Management Archaeologist

Humber Historic Environment Record, Humber Archaeology Partnership, The Old School, Northumberland Avenue, Hull HU2 0LN

Conservation Team Comments

Site: Thornholme Fields, Rudston Road, Burton Agnes

Ref: 25/10744/STPREP

Pre-application advice is sought regarding the proposed extension to the Three Oaks Renewable Energy Park, consisting of 6no wind turbines of up to 149.9m in height above ground level together with the associated infrastructure.

The development site is located approximately 1.3km from the Burton Agnes Conservation Area. The special interest of Burton Agnes derives in part from its history as an agricultural settlement. The surrounding countryside of the Wolds provides an ideal environment for agriculture, and Burton Agnes boasts many historical farmsteads that contribute to its special interest, as well as the 17th century Hall, which is one of the most impressive estate houses within the East Riding. As such, open agricultural fields and the natural environment play an important role in the significance of the conservation area.

The closest listed building (grade II) is located approximately 760m from the proposed development site.

It is noted that the proposed turbines would be located within an open and flat landscape, and this combined with their considerable height, would result in far reaching views of the development. It is possible that these views would be achieved from within the Burton Agnes Conservation Area and from nearby listed buildings. However, it is not anticipated that the proposed turbines would interrupt any intentional intervisibility between the heritage assets and the surrounding landscape, nor would they be viewed as a detracting feature within the context of the identified heritage assets.

We recommend that a thorough assessment of the impact of the proposed development on the significance of nearby heritage assets is submitted in support of an application. We suggest that this assessment would be informed by a Landscape and Visual Impact Assessment (LVIA).

In view of the above, considering paragraphs 202, 208 and 212 of the NPPF, sections 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and Policy ENV3 of the adopted policies set out in the East Riding Local Plan, it is unlikely that we would raise any objections to the proposed development.

MO 4.9.25



Memorandum

To: Planning & Development Management
F.A.O. Mr Thomas Parker

From: Hannah Skelton
Environmental Control Officer

Date: 4/9/25

FLARE ref: SRU 468400

Proposal	pre-app Proposed extension to Three Oaks Renewable Energy Park consist
Location	Thornholme Fields Energy Park 0 Rudston Road Burton Agnes
Case Reference	25/10744

ENVIRONMENTAL CONTROL & SPECIALIST DISTRICT RESPONSE

Thank you for consultation on the above pre-application, which is proposing a six wind turbine extension to the already consented Three Oaks Renewable Energy Park. The extension would comprise of six wind turbines up to 149.9m to tip, access tracks, hard standings, transformers and environmental enhancement works. Having reviewed the information provided with the pre-application, including an additional email from Gavin Irvine, Director of Ion Acoustics Ltd, which stated:

“I have attached our initial indicative noise contours for Vestas V117 turbines. Under the approved guidance, ETSU-R-97, noise levels below 35 dB LA90 are deemed sufficiently low to protect amenity irrespective of the background noise.

In this case, noise levels exceed 35 dB LA90 for some of the properties around Haisthorpe. Therefore to assess these we will need to measure the current background noise levels in relation to wind speed. We are proposing three noise monitoring locations as shown on the map, but these are not confirmed as we are seeking your comments and we will also need to contact the residents to request access.

The typical monitoring duration is four weeks so as to obtain a range of wind speeds and directions. In addition to the noise monitoring, we will need to measure the wind speed at the turbine hub height (91.4 metres). This will be done on the wind farm site.

I am contacting you to seek your agreement to the noise monitoring positions and to discuss the assessment methodology generally”.

Having reviewed the information provided, I would have no objections to the pre-application in principal; however I would request that any any subsequent applications include the following information:

Noise Assessment: A background noise assessment is required to demonstrate compliance with ETSU- R-97 day and night time noise limits at all wind speeds up to 12m/s at 10 metres above ground, both in isolation and cumulatively with other turbines in the area. If it is not possible to accurately predict noise levels at 12 m/s the reason should be stated in the assessment together with any uncertainty correction. The method of wind speed measurement shall also be stated together with appropriate wind shear corrections.

All assessments and calculations should be undertaken in accordance with ISO 9613-2:1996 'Acoustics – attenuation of sound during propagation outdoors – Part 2 general method of calculation' and the latest guidance published by the Institute of Acoustics (A Good Practice Guide To The Application Of ETSU-R-97 For The Assessment And Rating Of Wind Turbine Noise - May 2013 and the Supplementary Guidance Notes).

Proposed Noise Monitoring Locations: The acoustician should demonstrate that they have chosen representative locations for their monitoring in line with the above conditions and ETSU-R-97. Also, if the applicant would like the locations to be agreed prior to any noise monitoring taking place, it would be helpful if they provide the property names/number for reference. I appreciate these locations may change if there are issues with the occupants agreeing to the monitoring taking place.

Construction Phase of the Development: Noise during the construction phase of the development will also have to be considered, together with consideration of noise from the substation/s. A specific noise assessment may be requested during subsequent applications, together with mitigation schemes.

External Lighting Schemes: Should the applicant plan to erect any lighting on the site, I would expect to see a lighting scheme submitted and approved by the Local Planning Authority in accordance with ILE GN01.

Nature Conservation Comments for 25/10744/STPREP

Proposed extension to Three Oaks Renewable Energy Park consisting of 6 No. wind turbines of up to 149.9m in height above ground level and associated infrastructure at Thornholme Fields, Rudston Road, Burton Agnes, East Riding Of Yorkshire YO25 4NE

Case Officer: - Mr. Thomas Parker

Documents Considered:

- Documents and responses to former planning application 22/02777/STPLF (approved)
- Constraints Map With Parishes (Aug.25)
- Site Photos

General

The application should be accompanied by sufficient ecological information to enable the Council to assess the impacts of the development on biodiversity, prior to the application being determined. As such it will be necessary for the applicant to demonstrate that the proposals are in compliance with the under mentioned legislation, planning policies and guidance.

- The Conservation of Habitats and Species Regulations 2017 (as amended).
- The Wildlife and Countryside Act 1981 (as amended).
- The Natural Environment and Rural Communities Act 2006
- The Countryside and Right of Ways Act 2000.
- The Protection of Badgers Act 1992.
- The Environment Act 2021
- The National Planning Policy Framework (NPPF, 2021 as amended)
- Policy ENV4: International, National & Local Sites of importance for biodiversity
- Policy ENV5: Enhancing biodiversity and geodiversity
- Government Circular 06/2005: Biodiversity and Geological Conservation – Statutory Obligations and Their Impact Within The Planning System
- Biodiversity policies of the East Riding Local Plan (2012 - 2029)
- UK Post-2010 Biodiversity Framework (Revised Implementation Plan ((2018 – 2020))
- The East Riding of Yorkshire Biodiversity Action Plan (ERYBAP)

Internationally/nationally/ locally designated nature conservation sites

The Nature Conservation Team observes that there are no recorded international, national or locally designated nature conservation sites with a direct link or pathway to the application site. The nearest local site to the application is 'Rudston South' Local Wildlife Site and Verge Nature Reserve, 320m northwest, designated for its roadside

verge habitat. However, all efforts should be undertaken to avoid the local nature site in the vicinity of the application and these will be covered in the proposed Ecological Impact Report, mentioned below.

UK BAP Priority Habitats*

UK Biodiversity Action Plan (UK BAP) priority habitats cover a wide range of semi-natural habitat types, and were those that were identified as being the most threatened and requiring conservation action under the UK Biodiversity Action Plan (UK BAP).

To the north of the application site there are numerous parcels of 'Deciduous woodland' UK BAP priority habitat and large sections of 'Wood-pasture and Parkland' UK BAP priority habitat associated with and surrounding Thorpe Hall, near Rudston. Though on the northern side of Woldgate, all considerations within the application should be made as to not adversely affect these priority habitats.

Planning policy ENV2

It is noted that the proposal site is covered by planning policy ENV2: Promoting a high quality landscape within the East Riding of Yorkshire Council's Local Plan. Policy ENV2 identifies the need to sensitively integrate any development into the existing landscape, demonstrate an understanding of the intrinsic qualities of the landscape setting and, where possible, seek to make the most of the opportunities to protect and enhance landscape characteristics and features.

Biodiversity Net Gain (BNG)

The Nature Conservation Team advises that the application **will be subject** to the requirements of mandatory biodiversity net gain.

If the proposal is exempt from the BNG condition information to evidence the exemption must be provided.

Should BNG apply, the National Validation Requirements of the application must be accompanied by the following information:

- a statement as to whether the applicant believes that planning permission, if granted, would be subject to the biodiversity gain condition;
- the pre-development biodiversity value of the onsite habitat on the date of application (or an earlier date) including the completed metric calculation tool

- in excel format used showing the calculations, the publication date and version of the biodiversity metric used to calculate that value;
- where the applicant wishes to use an earlier date, the proposed earlier date and the reasons for proposing that date;
 - a statement confirming whether the biodiversity value of the onsite habitat is lower on the date of application (or an earlier date) because of the carrying on of activities ('degradation') in which case the value is to be taken as immediately before the carrying on of the activities, and if degradation has taken place supporting evidence of this;
 - a description of any irreplaceable habitat (as set out in column 1 of the Schedule to the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations [2024]) on the land to which the application relates, that exists on the date of application, (or an earlier date); and
 - a plan, drawn to an identified scale which must show the direction of North, showing onsite habitat existing on the date of application (or an earlier date), including any irreplaceable habitat.
 - To ensure the biodiversity gain objective can be met and the condition discharged successfully, it is important biodiversity net gain is considered early within the development process and considered throughout the design stage. We would therefore encourage the following additional information to be submitted:
 - A statement outlining how the development will achieve a minimum 10% net gain, including details of the existing baseline onsite habitats, and the anticipated post development habitats retained, created, or enhanced to achieve net gain. The statement should include an indication of whether BNG will be delivered onsite or whether additional offsite units or the purchase of statutory credits will be required, explaining how this will comply with the biodiversity gain hierarchy. If offsite provision is proposed an indication of where and how it is intended that these will be secured should be provided.
 - A complete (as far as possible) Statutory Metric, including post development on-site habitats and proposed use of offsite units, if use is anticipated.
 - Pre and post development habitat plans (GIS format preferred with pdf versions).
 - A draft/interim Habitat Management and Monitoring Plan (HMMP) based upon the Natural England template.

General information in respect of BNG is provided on the East Riding of Yorkshire Councils website

<https://www.eastriding.gov.uk/planning-permission-and-building-control/biodiversity-net-gain-bng/>

If the Biodiversity Net Gain Assessment details that on-site gains will not be achieved as proposed. The principal of off-site enhancement is acceptable and must be secured through a legal agreement. A monitoring fee commensurate to the size of the site and technicality of works will also be charged to cover the 30-year period. A draft Habitat

Management and Monitoring Plan is strongly encouraged as part of the submission to provide clarity for the LPA and the applicant. The applicant should ensure that the biodiversity metric covers all habitats within the redline boundary.

The Biodiversity Metric has been designed to follow the mitigation hierarchy, such that the retention of habitats on site should be prioritised. BNG should be achieved onsite as far as possible. Appropriate native species should be used of local provenance where possible (see species list below).

Protected Species

There are features of biodiversity value on and adjacent to the application area including ditches, hedgerows and trees. Some of these habitats may be suitable to support protected and priority species including bats, breeding birds, common toads and hedgehogs. The proposals may therefore have the potential to result in adverse impacts on such species. Therefore an ecological appraisal that is proportionate to the nature and scale of the proposals should be submitted with this application. This must assess the impact of all phases of the proposal, provide essential baseline information about the site's ecological characteristics, and allow an assessment to be made of the likely impacts of the proposals on the ecology of the site and adjoining land. Records of protected species should be sought from the North and East Yorkshire Ecological Data Centre (NEYEDC). In this instance an Ecological Assessment Report, much in the same vein as that undertaken for 22/02777/STPLF, should be undertaken to assess the site for its ecological value and to identify any potential constraints to the proposals. This ought to also including an Extended Phase 1 Habitat survey. Should the results of the appraisal, highlight the need for species specific surveys for protected species these should be carried out within the areas affected by the development. Such surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and where necessary, licensed consultants. There is a need to conserve and enhance biodiversity by applying the 'mitigation hierarchy' to cancel or reduce the negative effects of the development [i.e. avoid harming species, reduce harm (minimizing and mitigating harm) or compensate for harmful effects]. If it is not possible to avoid affecting protected species the applicant should include an appropriate and robust mitigation strategy with the survey report.

Collision Risk: Birds and other airborne fauna.

The site, located as it is on Thornholme Fields, on the downward lea from Woldgate, presents a topographical issue of; suddenly erected rising structures against the natural lay of the land. These new features could, in the short - medium term, cause a hazard in the form of collision strike to birds, or any other airborne fauna, such as bats, as traditional flight paths and airflows will be potentially disrupted by the new turbines. Risk assessments to the hazards of the turbines, located as they are should also feature in the proposed Ecological Assessment Report.

This, coupled with the ornithological findings of the previous Ecological Assessment Report for the Three Oaks Renewable Energy Park, (Aug. 2022, *Ecology Consulting*), application number 22/02777/STPLF, show a great need for caution, mitigation and risk assessment. Table 5 below gives an indication of the variety of bird species recorded on site. An up-to-date bird survey would also be expected as part of the full application. Whilst application 22/02777/STPLF dealt with the impacts of a solar farm, this application of 6 turbines will require quite a different assessment scope in terms of impact.

Table 5. Conservation evaluation of the autumn/winter non-breeding bird populations in the Three Oaks survey area.

Species	Mean peak count (2010-11 & 2019-20)	Mean peak in site + 100m buffer	>1% regional population	EU Birds Dir Ann 1	W and C Act Sch 1	Red [R]/Amber [A] List	UK BAP priority sp	Value
Pink-footed Goose	17	5				A		Low
Greylag Goose	13	0				A		Low
Mallard	6	0				A		Low
Cormorant	1	0						Nil
Grey Heron	2	0						Nil
Sparrowhawk	2	0				A		Low
Hen Harrier	1	0	✓	✓	✓	R		High
Red Kite	1	0	✓	✓	✓			High
Buzzard	5	1						Nil
Golden Plover	454	0	✓	✓				High
Lapwing	375	0	✓			R	✓	Medium
Snipe	1	0				A		Low
Woodcock	1	0				R		Medium
Curlew	1	0				R	✓	Medium

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Three Oaks Renewable Energy Park
ECOLOGICAL ASSESSMENT

ECOLOGY CONSULTING
August 2022

Species	Mean peak count (2010-11 & 2019-20)	Mean peak in site + 100m buffer	>1% regional population	EU Birds Dir Ann 1	W and C Act Sch 1	Red [R]/Amber [A] List	UK BAP priority sp	Value
Black-headed Gull	546	85				A		Low
Mediterranean Gull	2	0		✓	✓	A		High
Common Gull	300	59				A		Low
Great Black-backed Gull	2	1				A		Low
Herring Gull	369	383	✓			R	✓	Medium
Lesser Black-backed Gull	6	0				A		Low
Barn Owl	1	0			✓			High
Short-eared Owl	1	0	✓	✓		A		High
Tawny Owl	1	0				A		Low
Kestrel	5	3				A		Low
Merlin	1	0	✓	✓	✓	R		High
Peregrine	1	0	✓	✓	✓			High

Construction Environmental Management Plan

A construction environmental management plan (CEMP: Biodiversity) should be prepared by the applicant. The purpose of the CEMP will be to ensure that adverse environmental effects of development activities are mitigated see BS 42020:2013 (section 10, Implementation of development: biodiversity on construction sites). The CEMP can be provided at different stages of the planning process. Ideally it will be submitted as part of the planning application for approval by the local planning authority prior to determination of the application. Otherwise it will be necessary to impose a pre-commencement condition to secure the CEMP, which will need to be discharged before development begins. The CEMP should be compiled by a suitably qualified ecologist, include a timetable for implementation and a detailed plan. The scheme should provide full details of all ecological mitigation and management measures along with a programme for implementation.

Ecological Enhancements

Above and beyond the above mentioned BNG requirements, the proposals will provide an opportunity to implement beneficial measures such as habitat creation that will safeguard habitats for wildlife, with the aim of providing a net gain in biodiversity in accordance with the principles of the NPPF. Consequently, a Biodiversity Enhancement and Management Plan (BEMP) should be submitted in support of the application. We would recommend that the biodiversity enhancements should be selected to fit the physical attributes of the site and should tie in with existing habitats and species of value on and around the site and interconnected with the enhancements conditioned by the planning application 22/02777/STPLF. Any landscape planting or any compensatory planting to mitigate for a loss of hedgerow, trees or shrubs within the site should be composed from native species and species known to be of value for the attraction of wildlife.

Site Layout

Any landscaping proposals should be multifunctional by design to address both the ecological and landscape requirements of the development. Native plants of local origin should be incorporated into the planting proposals so as to create viable wildlife corridors that will provide suitable habitat and food source for many different species. Tree species should also be selected to ensure that there is a year round supply of fruit and berries for birds by choosing species that fruit at different times of year.

Hedgerows & Trees

It will be necessary for the applicant to mitigate the impact of any hedgerow or tree loss by providing compensatory habitat at loss ratio of at least 1:1 to ensure no nett loss of habitat on the site. Appropriate mitigation should be incorporated into the design of the development. We recommend the following species mix, bespoke to the Yorkshire Wolds National Character Area (No. 27), when gapping or creating additional hedgerow:-

Hawthorn	<i>Crataegus monogyna</i>	30%
Blackthorn	<i>Prunus spinosa</i>	30%
Hazel	<i>Corylus avellana</i>	15%
Field Maple	<i>Acer campestre</i>	10%
Dogwood	<i>Cornus sanguinea</i>	5%

Crab Apple	<i>Malus sylvestris</i>	5%
Buckthorn	<i>Rhamnus cathartica</i>	5%

Nb. The above mentioned species list could be incorporated into any landscaping schemes put forward in the main application.

Nesting Birds

The proposals may involve the removal of vegetation, and clearly appropriate measures will need to be implemented for the avoidance of impacts on nesting birds (breaches of the Wildlife and Countryside Act 1981 (as amended)). Impacts on nesting birds can best be avoided by vegetation removal outside of the bird nesting period (March to August inclusive). The Council would expect the developer to ensure such matters are appropriately addressed in any application that may be submitted. If it is not possible to avoid affecting nesting birds the applicant should include an appropriate and robust mitigation strategy with a survey report. Embedded mitigation measures should be incorporated into the scheme design. The applicant should provide sufficient information for mitigation measures to be implemented effectively.

Lighting

The design and operation of lighting should avoid light pollution in any identified “sensitive” areas, ensuring that they remain sufficiently dark for nocturnal species.

If you require any further information or clarification please do not hesitate to contact me via email, mike.newton@eastriding.gov.uk

MAN

Links to guidance referenced above

Please see government guidance on Biodiversity Net gain at:-

<https://www.gov.uk/government/collections/biodiversity-net-gain>

Building Research Establishment’s ‘Biodiversity Guidance for Solar Developments, 2014’ pdf, can be found at the following website: -

<https://www.bre.co.uk/filelibrary/nsc/Documents%20Library/NSC%20Publications/National-Solar-Centre---Biodiversity-Guidance-for-Solar-Developments--2014-.pdf>

Bat Surveys Good Practice Guidelines 4th Edition (Bat Conservation Trust, 2023)

https://cdn.bats.org.uk/uploads/pdf/Resources/For-professionals/Bat-Survey-Guidelines-4th-edition-AMENDED-27.03.24.pdf?v=1711530492&_gl=1*v4ly6o*_ga*ODUyMDIxNjAyLjE3Mzc0NjU3Mzl.*_ga_G28378TB9V*MTczNzQ2NTczMi4xLjEuMTczNzQ2NTc0MC4wLjAuMA..

Guidance Note 8: Bats and Artificial Lighting in the UK (Institution of Lighting Professionals & Bat Conservation Trust, 2018), can be found at the following website: -

<https://cieem.net/resource/bats-and-artificial-lighting-in-the-uk/>

RSPB guidance regarding buildings and birds:-

<https://www.rspb.org.uk/birds-and-wildlife/helping-birds-and-wildlife/birds-in-the-roof>

*The 'UK Post-2010 Biodiversity Framework', published in July 2012, succeeded the UK BAP. However, the UK BAP lists of priority species and habitats remain an important and valuable reference source. All of the species and habitats named here continued to feature in the UK Post-2010 Biodiversity Framework's UKBAP-UK List Priority Habitats & Species-V1.4-2010

Conservation Team Comments

Site: Thornholme Fields, Rudston Road, Burton Agnes

Ref: 25/10744/STPREP

Pre-application advice is sought regarding the proposed extension to the Three Oaks Renewable Energy Park, consisting of 6no wind turbines of up to 149.9m in height above ground level together with the associated infrastructure.

The development site is located approximately 1.3km from the Burton Agnes Conservation Area. The special interest of Burton Agnes derives in part from its history as an agricultural settlement. The surrounding countryside of the Wolds provides an ideal environment for agriculture, and Burton Agnes boasts many historical farmsteads that contribute to its special interest. As such, open agricultural fields and the natural environment play an important role in the significance of the conservation area. Also contributing towards the significance of the conservation area is the grade I listed 17th century Hall, which is one of the most impressive estate houses within the East Riding.

The development site is located approximately 1.5km northeast of Burton Agnes Hall, with the gardens above the HaHa and the view from the library identified as being possible viewpoints towards the proposed development. The hall is an outstanding example of Elizabethan architecture, positioned deliberately to achieve intentional, wide ranging views across the open countryside. The Secretary of State (ref 11/03999/STPLFE) concluded that turbines in this particular location would result in less than substantial harm because the turbines would be 'a distracting modern discordant presence' in views from Burton Agnes Hall. However, it is noted that the documentation submitted with the enquiry states that the development would not be visible from the gardens above the HaHa or the library.

The closest listed building (grade II) is located approximately 760m from the proposed development site. We raise no concerns regarding the impact on this listed building due to the intervening distance and dense natural screening provided by trees and formal landscaping.

It is noted that the proposed turbines would be located within an open and flat landscape, and this combined with their considerable height, would result in far reaching views of the development. It is possible that these views would be achieved from within the Burton Agnes Conservation Area and from nearby listed buildings. However, it is not anticipated that the proposed turbines would interrupt any intentional intervisibility between the heritage assets and the surrounding landscape, nor would they be viewed as a detracting feature within the context of the identified heritage assets.

We recommend that a thorough assessment of the impact of the proposed development on the significance of nearby heritage assets is submitted in support of an application. We suggest that this assessment would be informed by a Landscape and Visual Impact Assessment (LVIA). Additionally, to alleviate any concerns regarding possible visibility from Burton Agnes Hall, we would ask for evidence of verified views from gardens to east, walled gardens and first floor rooms to the east of the building. It would also be beneficial to position a physical marker on the development site (such as a balloon or crane) to the height of the proposed turbines to allow Officers to assess the wider impact independently.

MO 4.9.25

Hayley Sarvanandan

From: Peter Oladotun
Sent: 11 September 2025 13:09
To: Hayley Sarvanandan
Subject: Re: 25/10744/STPREP - Thornholme Fields, Burton Agnes

Hi Hayley,

The following are the Pre application comments;

The site is located within flood zone 1.

The Council's SFRA and flood data mapping should be used to inform any site specific FRA / Drainage Impact assessment for the site. The SFRA is available on the Council's Web site.

<https://www.eastriding.gov.uk/planning-permission-and-building-control/planning-policy-and-the-local-plan/strategic-flood-risk-assessment/>

The site is located at an area at low risk of surface water flooding according to the ERYC flood Data mapping.

The Council has no site-specific records of the historic flooding at this site. Check 2007 records

The Council has standing advice regarding surface water design. This is available on the Council Web site.

<https://www.eastriding.gov.uk/planning-permission-and-building-control/applications-for-planning-and-building-control/non-householder-and-commercial-planning-advice/#surface-water-drainage-systems>

Surface water drainage systems are provided in accordance with National Planning Policy Framework guidance and designed to control surface water runoff close to where it falls and mimic natural drainage as closely as possible.

Sustainable drainage systems are to be provided as high up the following hierarchy of drainage options as reasonably practicable

- into the ground (infiltration)

- to a surface water body; (Watercourse, Pond)

- to a surface water sewer, highway drain, or another drainage system;

- to a combined sewer.

Full details to support the chosen SUDS method, including layout, design and calculation, together with details to confirm why other hierarchical methods have been discounted shall be submitted with any Planning Application for the site

It is recommended that soakaway tests are carried out on site in accordance with BRE Digest 365. The test results will confirm if this will be a suitable method of surface water drainage for the site. If the proposed surface water drainage is to be discharged into an off site riparian owned watercourse, rights to discharge must be confirmed.

The site is not located within an Internal Drainage Boards district. Consent will be required from the Flood Risk Management Section of the council for any proposed discharge into a land drainage system. This consent must be obtained prior to any works commencing on the site. The applicant should contact the Flood and Coastal Risk Management Section at land.drainage@eastriding.gov.uk for further information.

A detailed drainage strategy will be required with any planning application for the site.

A full survey of the existing site must be undertaken to determine any existing Land Drainage systems, direction of flow and points of discharge.

Full details of the final design, layout and calculation for the chosen method of surface water drainage shall be submitted with any Planning Application for the site.

Kind regards,

Peter

From: Peter Oladotun <peter.oladotun@eastriding.gov.uk>
Sent: 09 September 2025 13:42
To: Russell Gladstone <russell.gladstone@eastriding.gov.uk>
Subject: Re: 25/10744/STPREP - Thornholme Fields, Burton Agnes

Thank you for letting me have the documents.

Kind regards,

Peter

From: Russell Gladstone <russell.gladstone@eastriding.gov.uk>
Sent: 09 September 2025 11:39
To: Peter Oladotun <peter.oladotun@eastriding.gov.uk>
Subject: Fw: 25/10744/STPREP - Thornholme Fields, Burton Agnes

Russell Gladstone

Assistant Principal Engineer – Flood and Coastal Risk Management

www.eastriding.gov.uk



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From: Hayley Sarvanandan <Hayley.Sarvanandan@eastriding.gov.uk>

Sent: 14 August 2025 8:59 AM

To: Land Drainage <Land.Drainage@eastriding.gov.uk>; LLFA <llfa@eastriding.gov.uk>; Highway Development Management <highway.dm@eastriding.gov.uk>; Nature Conservation <nature.conservation@eastriding.gov.uk>; Environmental Control <Environmental.Control@eastriding.gov.uk>; Countryside Access <Countryside.Access@eastriding.gov.uk>; Sustainable Development <Sustainable.Development@eastriding.gov.uk>; Building Conservation <buildingconservation@eastriding.gov.uk>; James Goodyear <archaeology.developmentcontrol@hullcc.gov.uk>; Invest Eastyorkshire <Invest.Eastyorkshire@eastriding.gov.uk>; Planning - Forward <forward.planning@eastriding.gov.uk>

Subject: 25/10744/STPREP - Thornholme Fields, Burton Agnes

Proposed extension to Three Oaks Renewable Energy Park consisting of 6no wind turbines of up to 149.9m in height above ground level and associated infrastructure

Hi

Please see the subject application for review, comments are due by 05.09.2025.

Kind regards,

Mrs Hayley Sarvanandan

Assistant Planning Officer

www.eastriding.gov.uk



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PLANNING & DEVELOPMENT MANAGEMENT STRATEGIC DEVELOPMENT MANAGEMENT

HIGHWAYS CONSULTATION RESPONSE

To: DC Case Officer
Development Management

App Ref: 25_10744_STPREP

From: Highway Management
Strategic Development
Management

Tel: 01482 393668

Response Date: 22nd August 2025

Highway Summary:

Proposed extension to Three Oaks Renewable Energy Park (6 no. wind turbines of up to 149.9m in height) at Thornholme Fields, Rudston Road, Burton Agnes, YO25 4NE.

Policy:

East Riding Local Plan, Policies S8, C1, EC4, ENV1, Design Code SPD, Sustainable Transport SPD, Local Transport Plan.

National Policies and guidance in relation to highways, including NPPF, Manual for Streets (MfS) and MfS 2, Design Manual for Roads and Bridges (DMRB).

Access:

The site access is on to an unmetalled but adopted and maintained highway (Road opposite Dunning Croft Thornholme) which leads down a gradient to the A614, Main Street, Thornholme, which is subject to a 40mph speed limit under Traffic Regulation Order ref: ERMS154 Main Street Thornholme.

The unmetalled road is principally used for leisure and farm access, where as the A614 is a principal highway providing access to the coastal resort of Bridlington and the Carnaby Industrial Estate, and an alternative route to Hull to the East and the cities of York and Hull and the strategic road network to the West.

The following impacts have been identified and would need to be assessed and mitigated as part of any future application.

1. Constraints at junction of the unmetalled highway and the A614 including accommodation of the proposed abnormal loads.

2. Two way passing movements for HGV should be demonstrated at any point under 7m of weight bearing carriageway because the impact of gradient and secure surface on laden HGV is a known constraint to safe access.
3. Constraints along the length of the unmetalled highway (gradient/unknown construction and it is likely that the weight bearing surface may be limited to 3m or less and impacted by water erosion).
4. High Voltage equipment most likely under the management of Northern Power Grid.
5. Visibility Constraints (Vegetation and layout) as compliance with the ERLP Design Guide requires the X distance to be taken from 4.5m, however, this could be mitigated with a Temporary Traffic Regulation Order to 30mph.
6. The need for the largest vehicle/load to be able to complete the turning movement in one and pull fully off the highway onto a secure and bonded surface (to aid restarting movement) at the junction with the A614.
7. Opposite Lay-by which also has access to the southwest must be preserved fully functional.
8. Width of highway – likely that turning movements will impact the opposite carriageway the A614 and the unmetalled highway is single track at that point leading to slow turning movements (See swept path analysis presented in 22/02777/STPLF @ 5 mph).
9. Water drainage and pooling, the gradient of the unmetalled highway suggest that any non-permeable surface treatment supporting HGV access may lead to a stream of water/mud affecting safe use of the A614. *It is contrary to section 163 of the Highways Act 1980 for surface water from private development to drain onto the highway or discharge into the highway drainage system. The development shall therefore be so designed and constructed that surface water from the development shall not be permitted to drain onto the highway or into the highway drainage system.*
10. Impacts of turning movements on the A614 due to high usage during good weather/weekends and holidays and the current HGV movements and use for Abnormal Loads (large static caravans and modular prefabrications regularly use this route).
11. Maintaining or diverting practical access for pedestrians, equines, agricultural and cyclists using the unmetalled highway/green lane (as this is not a ‘private track’ safe access to the public highway for all users should be maintained).
12. As it is likely that temporary access improvements will need to be undertaken, a scheme of reparations would need to be included in any application.
13. Route to site, the future completion of works at Jocks Lodge may open a more practical route to site (there is at constraint at Middleton on the Wolds on the proposed route) – liaison with the Abnormal Loads team should be undertaken prior to any future application.
14. Commitment as to the length of time of highway disruption should be made and a completion date for reparations made.
15. Identified and contactable person to address public reports/concerns/complaints and general communication during the construction phase.

Parking:

Compliant and practical turning/maintenance/servicing/parking/pedestrian and storage facilities should be shown on any drawings with details as to schedule and access routes during the operational phase. To comply with the C38 of the ERLP Design Code it is likely that EV charging is required.

Other Documentation:

- Transport Statement (TS) – required due to the complexity of the site and the lack of a suitable access route from the A614 and the need to provide assessment of additional development (adjacent solar facility - 22/02777/STPLF) likely to be underway at the same time.
- Travel Plan (TP) - not required, however, construction staff movements and accommodation proposals should be included in the CTMP.
- Construction Traffic Management Plan (CTMP) – a practical, comprehensive and robustly enforceable document is required as part of any future application.
- Operational Traffic Management Plan (OTMP) not required

Additional Highway Impacts:

This is a high impact proposal and considerable pre-application preparation is advised in respect of identifying, assessing and mitigation of the impacts of the construction phase on other road users. The following notes are provided to aid early engagement and compliance.

Highway Maintenance

The Applicant / Agent must contact both the East Riding of Yorkshire Council's Highways & Streetworks Departments (Tel: 01482 393939 using option 6 or email highwaymaintenance@eastriding.gov.uk or streetworks@eastriding.gov.uk) to obtain the necessary construction specifications and permits prior to any works commencing in the public highway. The applicant should be minded that it is an offence under both Section 131 of the Highways Act 1980 and the New Roads and Streetworks Act 1991 to work within the public highway (Carriageway, Footpath or Verge) without the written consent of the local highway authority (ERYC).

S184 Note

The Applicant(s) is/are reminded that they will be required to enter into a legally binding agreement with the East Riding of Yorkshire Council as the Highway Authority in order to ensure that any works that are carried out within the existing public highway are constructed to the required adoptable standard. A S184 application should be requested by emailing highwaymaintenance@eastriding.gov.uk.

The applicant should be aware that it is an offence under both Section 131 of the Highways Act 1980 and the New Roads and Street Works Act 1991 to work within the public highway (Carriageway, Footpath or Verge) without the written consent of the local highway authority (ERYC). The relevant licence(s) giving consent to occupy the highway and carry out work must be obtained by contacting the Street Works Team (email: streetworks@eastriding.gov.uk). It should be noted that in accordance with NRSWA a minimum of 3 months' notice may be required for Traffic Management.

S278 Note

The Applicant(s) is/are reminded that they will be required to enter into a legally binding agreement with the East Riding of Yorkshire Council as the Highway Authority in order to ensure that any improvement works are carried out within the existing public highway are constructed to

the required adoptable standard. For technical/construction approval please contact highway.dm@eastriding.gov.uk with full technical drawings.

The applicant should be aware that it is an offence under both Section 131 of the Highways Act 1980 and the New Roads and Street Works Act 1991 to work within the public highway (Carriageway, Footpath or Verge) without the written consent of the local highway authority (ERYC). The relevant licence(s) giving consent to occupy the highway and carry out work must be obtained by contacting the Street Works Team (email: streetworks@eastriding.gov.uk). It should be noted that in accordance with NRSWA a minimum of 3 months' notice may be required for Traffic Management.

Abnormal Loads Note

If the construction of the plant requires any abnormal load movements, a Traffic Management Plan should be submitted to and approved in writing by the Local Planning Authority. The Applicant/Agent must contact the East Riding of Yorkshire Council's Abnormal Loads Team (tel. 01482 395596 and email. Abnormal.loads@eastriding.gov.uk).

Contact National Highways

The applicant/agent should make early contact with National Highways due to the applications location in relation to the Strategic Road Network. Contact: Simon GP Geoghegan, National Highways, 2 City Walk, Leeds, LS11 9AR. Email: planningyne@nationalhighways.co.uk tel: 0300 470 2420

Stopping Up Orders

Until such time as a Stopping Up Order is confirmed, any encroachment into the public highway by the development may be unlawful and contrary to the provisions of the Highways Act 1980. Under Section 143 of the Highways Act 1980 the Council as Highways Authority has powers to serve formal proceedings requiring the removal of obstructions and in default powers to remove any structure unlawfully erected in the highway.

EV Parking Public/Commercial

Electric Vehicles charging facilities should comply with the requirements set out within Building Regulations Approved Document S which, suggests at least one parking space should be provided with EV charging facilities with a further 10% of the overall parking with passive provision.

Highway Specialist Advise

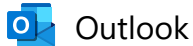
Highway Management are happy to discuss any further amendments and offer advice through our Highway Specialist Advice service. This can be submitted via the East Riding webpage by selecting "pre-application services" and then "specialist advice for developers" followed by "request specialist pre-application advice for highways" from the below address.

: <https://www.eastriding.gov.uk/planning-permission-and-building-control/applications-for-planning-and-building-control/non-householder-and-commercial-planning-advice/>

Highway Recommendation:

The principle of the development is considered acceptable provided that the impacts identified are successfully mitigated from a Highway Development Management aspect.

Nicola Moger
Highway Development Management Officer
Strategic Development Management



Re: 25/10744/STPREP - Thornholme Fields, Rudston Road, Burton Agnes, East Riding Of Yorkshire, YO25 4NE

From Andrew Chudley <andrew.chudley@eastriding.gov.uk>

Date Wed 01/10/2025 16:46

To Kathryn Barnes <Kathryn.Barnes@eastriding.gov.uk>

Kathryn,

My comment would be that as with all turbine proposals, we prefer at least twice the height away from public routes that can be used by equestrians (roads/carriageways, unmetalled highways, Byways Open to All Traffic, Restricted Byways and bridleways), but we are aware of the constraints of the area so accept the development as long as the turbines are at least their maximum height away from the publicly accessible routes.

regards

Andrew Chudley (He/Him/His)

Countryside Access Officer (PRoW East)

07768 190220

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From: Kathryn Barnes <Kathryn.Barnes@eastriding.gov.uk>

Sent: 01 October 2025 14:17

To: Andrew Chudley <andrew.chudley@eastriding.gov.uk>

Subject: 25/10744/STPREP - Thornholme Fields, Rudston Road, Burton Agnes, East Riding Of Yorkshire, YO25 4NE

Good Afternoon Andrew,

Proposed extension to Three Oaks Renewable Energy Park consisting of 6no wind turbines of up to 149.9m in height above ground level and associated infrastructure

Further to you being consulted on the above submission, the deadline for your response was 05.09.25. It appears, that no response has been received and it would be appreciated if you can forward any comments you wish to make as soon as possible.

Kind regards,

Kate

Mrs Kathryn Barnes

Assistant Planning Officer - Strategic

www.eastriding.gov.uk

Working Days: Mon-Thurs 9am-3pm



ERYC Planning Consultation Response - Sustainable Development	
App: 25/10744/STPREP	Site: Thornholme Fields, Burton Agnes
Date: 19/01/2026	From: Steve Whitbread, Biodiversity Officer
Proposal: Three Oaks Renewable Energy Park extension	
Response Summary: • The nearest local wildlife site, Dunsford South LWS, is a road verge is some 200+ metres distant from the development site at its closest point. • The development lies outside the area covered by the proposed Hull and East Yorkshire Local Nature Recovery Strategy. • There are unlikely to be any in principle objections in relation to the LNRS or designated LWS. • Beyond the land take, the most likely wildlife impacts of the scheme would be on bats or birds. • The cumulative effects of the scheme with those from the already consented Energy Park will need to be considered and appropriate mitigation identified.	
General Comments: • Consideration should be given to how mitigation and enhancement for this and the initial development might be combined. Beyond any deterrent or alert methods (such as painting one of the rotors on each turbine black to reduce risks day-flying birds, deliberate planting of tree and hedge lines that would serve both as feeding/shelter habitat and a means of guiding movement away from the turbines would be examples.	

Three Oaks Windfarm: Comments on the Landscape and Visual Impact Assessment Methodology and selection of Viewpoints

Extension of 6no wind turbines to Three Oaks Renewable Energy Park

Client: East Riding of Yorkshire Council

Date: October 2025

Revision: -

Three Oaks Windfarm : Comments on the LVIA methodology

1. Introduction

- 1.1. 2B Landscape Consultancy Ltd (2B) has reviewed LVIA methodology documents, on behalf of East Riding of Yorkshire Council (ERYC), concerning the Landscape and Visual Impact Assessment of the proposed development. These are:

- RCE09_LVIA_Assessment Methodology_d4.pdf
- RCE09_Preliminary LVIA viewpoints_d2.pdf
- PRE APP CONSULTATION REPORT.pdf

2. Methodology Overview

- 2.1. The LVIA Methodology is sound and, for the most part, in accordance with best-practice guidance (GLVIA3 and updates).
- 2.2. The methodology does not contain information on how cumulative effects would be assessed, as described in Chapter 7 of GLVIA 3.
- 2.3. There is reference to GLVIA 3 and other relevant Landscape Institute (LI) Technical Guidance Notes. However, the list of guidance referred to omits the following useful document:
- Technical Guidance Note LITGN-2024-01: Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Impact Assessment Third edition (GLVIA3)

3. Cumulative effects

- 3.1. Due to the proposed development being an extension to a consented energy park, cumulative effects should be considered within the report.
- 3.2. Cumulative effects should have it's own section within the LVIA report to assess the effects of the development within the context of surrounding developments.

- 3.3. Guidance on Cumulative Impact Assessment is complex and from a number of sources. Principally, for the purpose of LVIA, the source is GLVIA3.

- 3.4. GLVIA3 states (my underlining):

7.9 Cumulative effects assessment can be relevant to any form of development. In order to ensure a proportional response to the particular development proposal under consideration agreement should be reached in the scoping stage, through discussion with the competent authority and consultation bodies and judgement by the assessor, on the scope of the cumulative effects assessment.

7.13 Taking 'the project' to mean the main proposal that is being assessed, it is considered that existing schemes and those which are under construction, should be included in the baseline for both landscape and visual effects assessments (the LVIA baseline). The baseline for assessing cumulative landscape and visual effects should then include those schemes considered in the LVIA but in addition potential schemes that are not yet present in the landscape but are at various stages in the development and consenting process :

- *schemes with planning consent;*
- *schemes that are the subject of a valid planning application that has not yet been determined.*

7.15 The baseline for the LVIA itself will include (as in paragraph 5.18) evidence about change that may affect the landscape in the future. There may therefore be some degree of overlap with the baseline for the cumulative effects assessment. The key is to ensure that the assessment is true to the spirit of the generic definition of cumulative effects in dealing with 'other past, present or reasonably foreseeable actions' but that it is again proportional and reasonable and focuses on likely significant effects.

7.17 There are many different types of cumulative landscape and visual effect that may need to be considered. They can include:

Three Oaks Windfarm : Comments on the LVIA methodology

• the effects of an extension to an existing development or the positioning of a new development such that it extends or intensifies the landscape and/or visual effects of the first development:...

3.5. Technical Guidance Note LITGN-2024-01 Published August 2024 “Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Impact Assessment Third edition (GLVIA3)” para 7(2) makes multiple references, from other sources, to existing developments being included in Cumulative Assessments.

3.6. Where existing energy or other developments are regarded as reducing the value of landscape resources or views, a commensurate awareness of potential cumulative effects will be expected to be recognised.

4. Other considerations

4.1. ‘LVIA Method of Assessment para A2.49 states “As the ZTVs will be based on terrain data only...”’

4.2. As LiDAR data is freely available in both terrain-only’ (DTM) and with building/vegetation (DSM); it would be worth producing ZTVs using both of these datasets, as the DSM data does help the ZTV to be a little less ‘Theoretical’ and little closer to reality. The provision of both formats is informative.

4.3. Where construction phase impacts include notable amounts of vehicle movements, it is anticipated that these will be taken into account in the LVIA as secondary effects.

5. Proposed viewpoints and photomontages

5.1. Information on proposed viewpoints and photomontages comes from two sources:

- Three Oaks Renewable Energy Park Extension Pre-Application Advice Request: Appendix 1 – Proposed

visualisations

- RCE09_Preliminary LVIA viewpoints_d2 ‘Three Oaks Renewable Energy Park Extension Preliminary LVIA Viewpoints’
H:B:A Environment 2 02 September 2025

5.2. These are not completely consistent. The table on the last two pages of this report attempts to combine them. It is not clear whether the Proposed visualisations document represents a selection of the proposed viewpoints, for which photomontages are proposed to be produced.

5.3. Taking that to be the case, it is considered that all viewpoints would benefit from at least a ‘photowire’ visualisation. These are often helpful, even when the turbines might be partially obscured, in making the turbine locations understandable, from the viewpoint and in close proximity to it. Individual viewpoint comments are in the last column (‘2B Comment’) of the table below.

5.4. It is appreciated that the applicant intends to provide ‘Type 4’ visualisations (ref TGN06/19) as this is appropriate for the nature and context of the proposed development.

5.5. **Energy Park:** It is noted that the consented Three Oaks Energy Park would appear in several of the photomontage views. It appears that this has been taken into account in the draft images produced thus far, albeit difficult to see due to image resolution and compression. The presence of the consented Energy Park should be carried through to the proposed photomontages/ photowires.

5.6. **Mitigation:** the need for mitigation is noted throughout the LVIA Methodology. It is anticipated that this will be reflected by bringing forward meaningful mitigation proposals which aim to reduce the landscape and visual impacts of the development from surrounding areas and viewpoints, including from beyond the site and ownership boundary.

5.7. The applicant’s attention is drawn to the existence of the Humber Forest (HF). Whilst HF cannot fund planting required to mitigate development proposals, it can carry out such work and can assist

Three Oaks Windfarm : Comments on the LVIA methodology

in negotiation with landowners and authorities. A positive approach to the opportunities thereby presented for mitigation would be anticipated.

- 5.8. <https://www.humberforest.org/>
- 5.9. **Ancillary features:** there are a number of items noted in the project description, including a met mast, hardstandings, access tracks, transformers etc. Where these are a relevant part of the view, they should be included in any visualisations. It is also noted that the turbine foundations will require *“720cum of concrete with 100T of steel reinforcement”*. Where this displaces soil and subsoil on site, it is assumed that this will either be removed or retained on site (and taken into account in the appropriate parts of the EIA). If retained in heaps, this should be represented in the visualisations.
- 5.10. **Nighttime Effects:** if nighttime effects are anticipated, either during construction or operational phases, these should be fully described and assessed. In addition, if nighttime effects of the turbines are likely to include aviation lighting, this should be represented in an appropriate number of photomontages, to convey those effects for relevant receptors.
- 5.11. **Resolution/compression of visualisation images:** It is noted that the visualisations of the Three Oaks Energy Park were of high quality and were provided by a highly-regarded practitioner.
- 5.12. However, they were let down by being bundled in with other parts of the LVIA e.g. Appendix 06, Part 1 of 4 and Part 2 of 4. There is little point producing high quality visualisations, then reducing that quality at the point of delivery into PDF files.
- 5.13. It is requested that Visualisations be provided in a set of separate, limited-size files which do not compromise image quality as a result of image compression or reduced resolution to meet an arbitrary file size limit. Ideally the images relating to each viewpoint would be provided in their own multi-page PDF file, or even as separate files, if that assists in preserving clarity of the images. See also LI TGN06/19 Appendix 7 ‘Digital outputs’.

Three Oaks Windfarm : Comments on proposed viewpoints

VP no	(corresponds with provided Viewpoint No draft photomontage) Name	NGR		Approx elevation	Approx distance / direction from nearest turbine	Receptors	Cumulative?	2B Comment
A	(VP1) Layby on Woldgate	509983	465721	77 m	0.64 km (T1) / W	Walkers, cyclists, equestrians, motorists	Yes	Appropriate location. Include Three Oaks solar.
B	High point on Woldgate	512717	466636	73 m	1.23 km (T3) / ENE	Walkers, cyclists, equestrians, motorists	Yes	Appropriate location, but consider moving west to E512571 N466582 for clearer view. If no photomontage, a photowire would be helpful. Include Three Oaks solar.
C	(VP2) West Back Side, Haisthorpe	512680	464730	26 m	1.10 km (T6) / SE	Residents, walkers, equestrians, cyclists, motorists	Yes	Appropriate location. Include Three Oaks solar.
D	(VP3) A614 between Thornholme and Haisthorpe	512376	464346	20 m	1.14 km (T6) / S	Motorists	Yes	Appropriate location, but T1 is behind T5. Consider moving east to E512446 N464382 for clearer view. Include Three Oaks solar.
	(VP4) Back Lane					Walkers, cyclists, equestrians, motorists	Yes	Not listed in the VP table but provided as a draft photomontage. Appropriate location. Include Three Oaks solar.
E	Burton Agnes Hall garden above HaHa	510400	463296	31 m	1.72 km (T4) / SSW	Visitors to Burton Agnes Hall	No (from this location)	No draft photomontage offered, but a photomontage, or at minimum a photowire, would be relevant. Micro-site for clearest view. Include Three Oaks solar if visible.
F	Burton Agnes Hall Library	510313	463265	45 m	1.74 km (T4) / SSW	Visitors to Burton Agnes Hall	No (from this location)	No draft photomontage offered, but a photomontage, or at minimum a photowire, would be relevant. Micro-site for clearest view. Include Three Oaks solar if visible.
G	(VP6) All Saints Church, Rudston (church yard above School Lane)	509799	467708	31 m	2.32 km (T1) / NNW	Residents, visitors to church and standing stone, walkers, cyclists, equestrians, motorists	No	Appropriate location (Heritage/Visitors).
H	Carnaby Temple	514113	466658	71 m	2.50 km (T3) / ENE	Walkers, cyclists, equestrians, visitors to Carnaby Temple (not	Yes	Appropriate location (Heritage/Walkers/Equestrians). If no photomontage, a photowire would be helpful.
I	(VP5) St John the Baptist Church, Carnaby (gate to churchyard off Church Lane)	514432	465586	39 m	2.68 km (T6) / E	Residents, visitors to church	No	Appropriate location. Appreciated that clear view is difficult due to vegetation. Micro-site as far as possible. Is turbine silhouette correct for the photo lighting condition?
J	Moor Lane on Harpham Moor	510670	460880	16 m	4.06 km (T4) / S	Walkers, cyclists, equestrians, motorists	Yes	Potentially limited view due to intervening vegetation but worth considering a photowire.
K	Crossroads on High Street, west of Rudston	507318	468556	98 m	4.46 km (T1) / NW	Motorists	Yes	Useful open distance view. If no photomontage, a photowire would be helpful.
L	A614 near Bracey Bridge	507370	461790	35 m	4.62 km (T4) / SW	Motorists	Yes	Potentially limited view due to intervening vegetation but worth considering a photowire.

Three Oaks Windfarm : Comments on proposed viewpoints

VP no	(corresponds with provided Viewpoint No draft photomontage) Name	NGR		Approx elevation	Approx distance / direction from nearest turbine	Receptors	Cumulative?	2B Comment
M	A165 near Park and Ride roundabout	516414	464901	12 m	4.64 km (T6) / E	Motorists	Yes	Potentially limited view due to intervening vegetation but worth considering a photowire.
N	A165 near Barmston	515435	458898	10 m	7.37 km (T6) / SSE	Motorists	Yes	Potentially limited view due to intervening vegetation but worth considering a photowire. Fraisthorpe within same view.
O	Skipsea Castle mound	516200	454819	7 m	11.34 km / SSE	Visitors to Skipsea Castle mound	Yes	Distant but worth considering for Heritage and Visitors. Potentially limited view due to intervening vegetation but worth considering a photowire. Fraisthorpe/Lissett within same view. Given coordinates are not on the castle mound.

Three Oaks Windfarm: Comments on the Landscape and Visual Impact Assessment Methodology and selection of Viewpoints

Extension of 6no wind turbines to Three Oaks Renewable Energy Park

Client: East Riding of Yorkshire Council

Date: October 2025

Revision: -

Three Oaks Windfarm : Comments on the LVIA methodology

1. Introduction

1.1. 2B Landscape Consultancy Ltd (2B) has reviewed LVIA methodology documents, on behalf of East Riding of Yorkshire Council (ERYC), concerning the Landscape and Visual Impact Assessment of the proposed development. These are:

- RCE09_LVIA_Assessment Methodology_d4.pdf
- RCE09_Preliminary LVIA viewpoints_d2.pdf
- PRE APP CONSULTATION REPORT.pdf

2. Methodology Overview

2.1. The LVIA Methodology is sound and, for the most part, in accordance with best-practice guidance (GLVIA3 and updates).

2.2. The methodology does not contain information on how cumulative effects would be assessed, as described in Chapter 7 of GLVIA 3.

2.3. There is reference to GLVIA 3 and other relevant Landscape Institute (LI) Technical Guidance Notes. However, the list of guidance referred to omits the following useful document:

- Technical Guidance Note LITGN-2024-01: Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Impact Assessment Third edition (GLVIA3)

3. Cumulative effects

3.1. Due to the proposed development being an extension to a consented energy park, cumulative effects should be considered within the report.

3.2. Cumulative effects should have it's own section within the LVIA report to assess the effects of the development within the context of surrounding developments.

3.3. Guidance on Cumulative Impact Assessment is complex and from a number of sources. Principally, for the purpose of LVIA, the source is GLVIA3.

3.4. GLVIA3 states (my underlining):

7.9 Cumulative effects assessment can be relevant to any form of development. In order to ensure a proportional response to the particular development proposal under consideration agreement should be reached in the scoping stage, through discussion with the competent authority and consultation bodies and judgement by the assessor, on the scope of the cumulative effects assessment.

7.13 Taking 'the project' to mean the main proposal that is being assessed, it is considered that existing schemes and those which are under construction, should be included in the baseline for both landscape and visual effects assessments (the LVIA baseline). The baseline for assessing cumulative landscape and visual effects should then include those schemes considered in the LVIA but in addition potential schemes that are not yet present in the landscape but are at various stages in the development and consenting process :

- *schemes with planning consent;*
- *schemes that are the subject of a valid planning application that has not yet been determined.*

7.15 The baseline for the LVIA itself will include (as in paragraph 5.18) evidence about change that may affect the landscape in the future. There may therefore be some degree of overlap with the baseline for the cumulative effects assessment. The key is to ensure that the assessment is true to the spirit of the generic definition of cumulative effects in dealing with 'other past, present or reasonably foreseeable actions' but that it is again proportional and reasonable and focuses on likely significant effects.

7.17 There are many different types of cumulative landscape and visual effect that may need to be considered. They can include:

Three Oaks Windfarm : Comments on the LVIA methodology

• the effects of an extension to an existing development or the positioning of a new development such that it extends or intensifies the landscape and/or visual effects of the first development...

3.5. Technical Guidance Note LITGN-2024-01 Published August 2024 “Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Impact Assessment Third edition (GLVIA3)” para 7(2) makes multiple references, from other sources, to existing developments being included in Cumulative Assessments.

3.6. Where existing energy or other developments are regarded as reducing the value of landscape resources or views, a commensurate awareness of potential cumulative effects will be expected to be recognised.

4. Other considerations

4.1. ‘LVIA Method of Assessment para A2.49 states “As the ZTVs will be based on terrain data only...”’

4.2. As LiDAR data is freely available in both terrain-only’ (DTM) and with building/vegetation (DSM); it would be worth producing ZTVs using both of these datasets, as the DSM data does help the ZTV to be a little less ‘Theoretical’ and little closer to reality. The provision of both formats is informative.

4.3. Where construction phase impacts include notable amounts of vehicle movements, it is anticipated that these will be taken into account in the LVIA as secondary effects.

5. Proposed viewpoints and photomontages

5.1. Information on proposed viewpoints and photomontages comes from two sources:

- Three Oaks Renewable Energy Park Extension Pre-Application Advice Request: Appendix 1 – Proposed

visualisations

- RCE09_Preliminary LVIA viewpoints_d2 ‘Three Oaks Renewable Energy Park Extension Preliminary LVIA Viewpoints’
H:B:A Environment 2 02 September 2025

5.2. These are not completely consistent. The table on the last two pages of this report attempts to combine them. It is not clear whether the Proposed visualisations document represents a selection of the proposed viewpoints, for which photomontages are proposed to be produced.

5.3. Taking that to be the case, it is considered that all viewpoints would benefit from at least a ‘photowire’ visualisation. These are often helpful, even when the turbines might be partially obscured, in making the turbine locations understandable, from the viewpoint and in close proximity to it. Individual viewpoint comments are in the last column (‘2B Comment’) of the table below.

5.4. It is appreciated that the applicant intends to provide ‘Type 4’ visualisations (ref TGN06/19) as this is appropriate for the nature and context of the proposed development.

5.5. **Energy Park:** It is noted that the consented Three Oaks Energy Park would appear in several of the photomontage views. It appears that this has been taken into account in the draft images produced thus far, albeit difficult to see due to image resolution and compression. The presence of the consented Energy Park should be carried through to the proposed photomontages/ photowires.

5.6. **Mitigation:** the need for mitigation is noted throughout the LVIA Methodology. It is anticipated that this will be reflected by bringing forward meaningful mitigation proposals which aim to reduce the landscape and visual impacts of the development from surrounding areas and viewpoints, including from beyond the site and ownership boundary.

5.7. The applicant’s attention is drawn to the existence of the Humber Forest (HF). Whilst HF cannot fund planting required to mitigate development proposals, it can carry out such work and can assist

Three Oaks Windfarm : Comments on the LVIA methodology

in negotiation with landowners and authorities. A positive approach to the opportunities thereby presented for mitigation would be anticipated.

- 5.8. <https://www.humberforest.org/>
- 5.9. **Ancillary features:** there are a number of items noted in the project description, including a met mast, hardstandings, access tracks, transformers etc. Where these are a relevant part of the view, they should be included in any visualisations. It is also noted that the turbine foundations will require *“720cum of concrete with 100T of steel reinforcement”*. Where this displaces soil and subsoil on site, it is assumed that this will either be removed or retained on site (and taken into account in the appropriate parts of the EIA). If retained in heaps, this should be represented in the visualisations.
- 5.10. **Nighttime Effects:** if nighttime effects are anticipated, either during construction or operational phases, these should be fully described and assessed. In addition, if nighttime effects of the turbines are likely to include aviation lighting, this should be represented in an appropriate number of photomontages, to convey those effects for relevant receptors.
- 5.11. **Resolution/compression of visualisation images:** It is noted that the visualisations of the Three Oaks Energy Park were of high quality and were provided by a highly-regarded practitioner.
- 5.12. However, they were let down by being bundled in with other parts of the LVIA e.g. Appendix 06, Part 1 of 4 and Part 2 of 4. There is little point producing high quality visualisations, then reducing that quality at the point of delivery into PDF files.
- 5.13. It is requested that Visualisations be provided in a set of separate, limited-size files which do not compromise image quality as a result of image compression or reduced resolution to meet an arbitrary file size limit. Ideally the images relating to each viewpoint would be provided in their own multi-page PDF file, or even as separate files, if that assists in preserving clarity of the images. See also LI TGN06/19 Appendix 7 ‘Digital outputs’.

Three Oaks Windfarm : Comments on proposed viewpoints

VP no	(corresponds with provided Viewpoint No draft photomontage) Name	NGR		Approx elevation	Approx distance / direction from nearest turbine	Receptors	Cumulative?	2B Comment
A	(VP1) Layby on Woldgate	509983	465721	77 m	0.64 km (T1) / W	Walkers, cyclists, equestrians, motorists	Yes	Appropriate location. Include Three Oaks solar.
B	High point on Woldgate	512717	466636	73 m	1.23 km (T3) / ENE	Walkers, cyclists, equestrians, motorists	Yes	Appropriate location, but consider moving west to E512571 N466582 for clearer view. If no photomontage, a photowire would be helpful. Include Three Oaks solar.
C	(VP2) West Back Side, Haisthorpe	512680	464730	26 m	1.10 km (T6) / SE	Residents, walkers, equestrians, cyclists, motorists	Yes	Appropriate location. Include Three Oaks solar.
D	(VP3) A614 between Thornholme and Haisthorpe	512376	464346	20 m	1.14 km (T6) / S	Motorists	Yes	Appropriate location, but T1 is behind T5. Consider moving east to E512446 N464382 for clearer view. Include Three Oaks solar.
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